

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

*** CRIMINAL NO.: 14-86**

v.

*** SECTION: "J"**

PAUL LEE

*** VIOLATIONS: 21 USC § 846**

*** * ***

FACTUAL BASIS

Had this matter proceeded to trial, the government would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimony and other evidence, the following facts to support the allegations against the defendant, **PAUL LEE** a/k/a "Baby Brother."

Beginning in or around January 2013, the defendant, **PAUL LEE**, combined, conspired, confederated, and agreed with other persons to distribute heroin in the New Orleans area, in that **LEE** acquired heroin from **ANTHONY GIBSON** and then resold it to customers in the New Orleans area.

Court-authorized wire intercepts demonstrate that **LEE** used his cellular phone to coordinate meetings with **GIBSON** for the purpose of acquiring wholesale quantities of heroin. From January 2013 through December 2013, **LEE** acquired half or whole kilograms of heroin

from GIBSON approximately once per month at a price of approximately \$45,000.00 for a half kilogram and \$87,000.00 for a whole kilogram.

In January 2014, agents of the Drug Enforcement Administration (“DEA”) searched a residence utilized by LEE and recovered 12.8 grams of mannitol powder, a digital scale, and \$11,577.94 U.S. currency. During pre-warrant surveillance, agents stopped LEE in a vehicle and seized a stolen Springfield Arms pistol belonging to LEE. LEE was interviewed by a Federal Bureau of Investigations (“FBI”) agent, voluntarily waived his rights per *Miranda*, and admitted that he sold heroin.

Drug Quantities

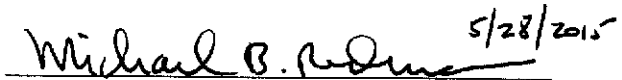
The government and the defendant, PAUL LEE, stipulate and agree that the defendant should be held accountable for at least three kilograms but less than ten kilograms of heroin, as this amount of heroin was bought and sold by him within the timeframe of the Superseding Indictment.

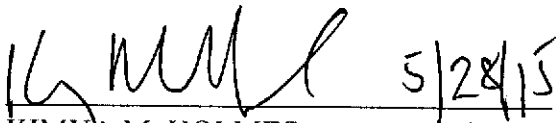
Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by the defendant, **PAUL**, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the defendant's plea of guilty to Count 1 of the Superseding Indictment.

APPROVED AND ACCEPTED:


PAUL LEE (date)
Defendant


MICHAEL B. REDMANN (date)
Assistant United States Attorney


KIMYA M. HOLMES (date)
Counsel for Defendant