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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



The above-named defendant, Beth Marie NGUYEN (hereafter, "NGUYEN"), has agreed to plead guilty pursuant to a plea agreement with the Government to Count One of the Indictment. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt the following facts to support the allegations against NGUYEN:

Count One - Drug Trafficking Conspiracy

Beginning on a date unknown, but not later than October 1, 2013, and continuing until on or about July 25, 2014, in the Eastern District of Louisiana, and elsewhere, NGUYEN conspired directly with codefendant Michael SORINA, and others, to distribute and to possess with the intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin.

During the course of the conspiracy, NGUYEN was aware that SORINA distributed heroin and other narcotics in the Eastern District of Louisiana, and knew that SORINA was looking for a new source of supply. NGUYEN herself had previously sold narcotics to SORINA. NGUYEN also knew an unnamed co-conspirator, and knew that the unnamed co-conspirator could supply kilogram quantities of heroin and other narcotics. NGUYEN began facilitating drug transactions, including heroin and cocaine, between SORINA and the unnamed co-conspirator. Specifically,

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NGUYEN communicated by phone with the unnamed co-conspirator and SORINA to set up the transactions. On multiple occasions, NGUYEN took possession of the narcotics from the unnamed co-conspirator and his associates, and then transported the narcotics to SORINA. SORINA paid NGUYEN for the narcotics, and NGUYEN then paid the unnamed co-conspirator. NGUYEN received a service fee for brokering these transactions. On multiple occasions, SORINA complained to NGUYEN about the quality of heroin that he received from the unnamed co-conspirator; on one of these occasions, NGUYEN took back the heroin from SORINA and returned it to the unnamed co-conspirator.

NGUYEN and the government stipulate for the purposes of sentencing that NGUYEN was responsible for distributing at least one (1) kilogram but less than three (3) kilograms of heroin, through NGUYEN's own conduct and the reasonably foreseeable conduct of her co-conspirators.

NGUYEN's involvement in the conspiracy charged in Count One of the Indictment is not limited to the facts contained in this stipulated factual basis. These facts are merely a summary of NGUYEN's involvement in this conspiracy and are presented in this document to support her plea of guilty to Count One in the Indictment.

Assistant United States Attorney

SCHWABE, JR (Date)

Attorney for Defendant

8/6/15-Defendant

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