

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO. 14-168

v.

*

SECTION: "I"

CLIFFORD SONNIER

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FACTUAL BASIS

The above-named defendant, Clifford SONNIER, a/k/a "Dut," has agreed to plead guilty to Count One of the Superseding Indictment, which charges the defendant and others with conspiring to possess with the intent to distribute and to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin and two hundred eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 846. 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 the defendant, Clifford SONNIER (hereafter referred to as SONNIER):

From on or about January 1, 2010, and continuing until at least on or about November 20, 2013, in the Eastern District of Louisiana, and elsewhere, Clifford SONNIER, a/k/a "Dut," conspired with Harry SMOOT, Frankie HOOKFIN, Ray WOODRUFF, Terrence KELLEY, a.k.a. "Streets," a.k.a. "T," Lance SINGLETON, a.k.a. "Life Taker," Isaac SMITH, a.k.a. "Ike," Christopher BROWN, a.k.a. "Ten," Andre ADDISON, a.k.a. "Dooda," Joequell LEWIS, a.k.a. "Blow," Richard THOMAS, Terrell WADE, a.k.a. "T-Dog," and others to distribute and to possess with the intent to distribute two hundred eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base.

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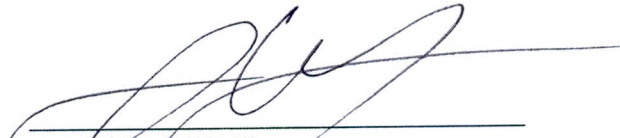
SONNIER primarily sold retail quantities of cocaine base from 2010 until the end of this conspiracy. During this period, SONNIER would acquire cocaine hydrochloride and cocaine base from members of the conspiracy, as well as other individuals. SONNIER on occasion converted the cocaine hydrochloride into cocaine base, which he then sold in retail quantities. SONNIER primarily sold cocaine base in the Harvey area of the western part of Jefferson Parish, in the Eastern District of Louisiana, but also sold cocaine base with other members of the conspiracy in the Avondale/Waggaman/Westwego areas. SONNIER and other members of the conspiracy sold to dozens of customers on a regular basis. The government would call cooperating defendants and cooperating witnesses who would testify that they saw SONNIER sell cocaine base on hundreds of occasions. The government would also introduce evidence of numerous undercover purchases of cocaine base made from SONNIER, as well as calls setting up those purchases and video of at least one of the purchases. The government would also introduce evidence from a Title III wire interception of SONNIER's phone that demonstrates SONNIER's involvement in the distribution of cocaine base with other members of the conspiracy.

The government would also introduce evidence from social media showing SONNIER associating with several of his coconspirators, including BROWN, SMITH, WOODRUFF, HOOKFIN, ADDISON, and SINGLETON. One of the photos showing SONNIER with several of his coconspirators has a comment from SMOOT saying "I love my team." SONNIER also posted to his own Instagram account a photo with, among others, SMITH, WOODRUFF, and HOOKFIN, in which they are shown making gun gestures to the camera. The photo is captioned "We da murder team Call the cops..."

J.C.S. *CS*


SONNIER was responsible either as a direct result of his own conduct and/or the conduct of his co-conspirators in furtherance of the conspiracy reasonably foreseeable to SONNIER for the acquisition and distribution of over 280 grams of cocaine base during the course of this conspiracy. Accordingly, the government and the defendant agree and stipulate that for sentencing purposes the defendant will be held responsible for 280 to 840 grams of cocaine base as those amounts were distributed or possessed with the intent to be distributed during the course of the conspiracy as a result of the defendant's own direct conduct and/or the conduct of his co-conspirators in furtherance of the conspiracy that was reasonably foreseeable to him.

This Factual Basis is not intended to constitute a complete statement of all facts known to the Government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this Factual Basis is to demonstrate that there exists a sufficient legal and factual basis for SONNIER's plea of guilty to Count One of the Superseding Indictment.



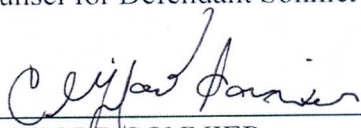
J. COLLIN SIMS
Assistant United States Attorney
Louisiana Bar Roll Number 30727

8/24/15
DATE




PATRICK C. MCGINITY
Counsel for Defendant Sonnier

9/24/15
DATE



CLIFFORD SONNIER
Defendant

9.22.15
DATE


J.C.S.
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