

U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
FILED 11-10-2015  
WILLIAM W. BLEVINS  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 14-168  
v. \* SECTION: "I"  
ANDRE ADDISON \*  
a/k/a "Dooda" \*  
\* \* \*

FACTUAL BASIS

The above-named defendant, Andre ADDISON, a/k/a "Dooda," has agreed to plead guilty pursuant to a plea agreement with the Government to Count One of the Second Superseding Bill of Information, which charges the defendant and others with conspiring to possess with the intent to distribute and to distribute twenty-eight (28) 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), 841(b)(1)(B), 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, Andre ADDISON (hereafter referred to as ADDISON):

From on or about January 1, 2010, and continuing until on or about November 20, 2013, in the Eastern District of Louisiana, and elsewhere, Andre ADDISON, a/k/a "Dooda," 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," Clifford SONNIER, a/k/a "Dut," Joequell LEWIS, a/k/a "Blow," Christopher BROWN, a/k/a "Ten," Richard THOMAS, Terrell WADE, a/k/a "T-Dog," and others to distribute and to possess with the intent to distribute twenty-eight (28) grams or more of a mixture or substance containing a detectable amount of cocaine base.

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PS  
MR


ADDISON sold cocaine base during the course of the charged conspiracy, primarily in areas of the Westbank of Jefferson Parish. The government would present evidence from cooperating defendants and cooperating witnesses who would testify about ADDISON's drug trafficking activities. Among other things, these witnesses would describe how ADDISON developed his own source for cocaine hydrochloride and would use Richard THOMAS and/or Terrell WADE to cook the cocaine hydrochloride into cocaine base that was then distributed by the conspirators. Although ADDISON usually had WADE cook ounce quantities, on at least one occasion, WADE cooked multiple ounces of cocaine hydrochloride into cocaine base at ADDISON's request. J.L. would describe buying baking soda for ADDISON to be used in the preparation of cocaine base and observing ADDISON purchase cocaine hydrochloride on one occasion.

The government would also introduce evidence from social media showing ADDISON associating with several of his coconspirators and displaying large amounts of cash.


ADDISON was responsible either as a direct result of his own conduct and/or the conduct of his co-conspirators in furtherance of the conspiracy that was reasonably foreseeable to ADDISON for the acquisition and distribution of over twenty-eight 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 more than 196 grams but less than 280 grams of cocaine base, as that amount was 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.

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PS  
MR

This Factual Basis is not intended to constitute a complete statement of all facts known by 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 ADDISON's plea of guilty to Count One of the Second Superseding Bill of Information.

  
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MYLES RANIER  
Assistant United States Attorney  
Louisiana Bar Roll Number 30029

11/10/15  
DATE

  
\_\_\_\_\_  
PETER G. STRASSER, ESQ.  
Counsel for Defendant Addison  
Louisiana Bar Roll Number 19169

11-10-15  
DATE

  
\_\_\_\_\_  
ANDRE ADDISON  
Defendant

11-10-15  
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