

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
FILED 3-31-2016
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 15-72
v. * SECTION: "H"
STERLING ROBINSON *
a/k/a "Scooter" *
* * *

FACTUAL BASIS

Should this matter have gone to trial, the government would have proved through the introduction of competent testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in the indictment now pending against the defendant, **STERLING ROBINSON, a/k/a "Scooter"** (herein "**ROBINSON**"). (Unless otherwise noted, the acts and events listed herein occurred in the Eastern District of Louisiana.)

On or about October 14, 2014, two Gretna police officers, in the area of Milton & Pratt Streets, examined a 2010 Acura TSC parked illegally at the intersection of Milton and Pratt Streets using handheld flashlights. The officers observed, in plain view, a baggie containing what appeared to be crack cocaine in the front passenger door handle and a semi-automatic pistol secured between the front passenger seat and the middle console. Officers set up observation on the vehicle and waited for the occupants to return.


Everett Ross, Deandre Rose, **ROBINSON** and one female walked up to the vehicle. Everett Ross used a remote keyless entry system to open the vehicle, at which point all four people entered the vehicle. **ROBINSON** entered the front passenger's seat. The Gretna Police Department then approached the vehicle and arrested all of the occupants. Additional

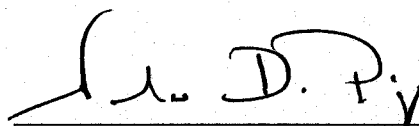
investigation into the vehicle uncovered that it did not belong to Ross, but had been loaned to him by another individual and that there had been no firearms in it prior to Ross borrowing it.


A search of the vehicle uncovered a Kahr model CW9, 9mm semi-automatic pistol, bearing serial number EJ5459, under the passenger seat, as well as the bag of crack cocaine which had previously been seen by the investigating officers. The officers also located two additional handguns in the vehicle. Investigation into each of the recovered weapons indicated that they had been reported stolen based on a check of the serial numbers through the NCIC system. Further investigation revealed that the firearms had previously travelled in interstate commerce.

LIMITED NATURE OF FACTUAL BASIS

This proffer of evidence is not intended to constitute a complete statement of all facts known by **STERLING ROBINSON** and 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 proffer is to demonstrate that there exists a sufficient legal basis for **STERLING ROBINSON's** plea of guilty to the charged offense.

 3-31-16
Sterling Robinson (Date)
Defendant

 3/31/16
Nolan D. Paige (Date)
Assistant United States Attorney

 3-31-16
Lindsay A. Larsen, III (Date)
Attorney for the Defendant