

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

**UNITED STATES OF AMERICA**

\*

**CRIMINAL NO: 15-040**

**v.**

\*

**SECTION: "R"**

**SABRINA BOURGEOIS**

\*

\* \* \*

**FACTUAL BASIS**

The above-named defendant, **SABRINA BOURGEOIS ("BOURGEOIS")**, has agreed to plead guilty to Count 1 of the Superseding Bill of Information. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts. Unless stated otherwise, these acts occurred in the Eastern District of Louisiana:

In 2014, agents with the Drug Enforcement Administration ("DEA") began an investigation into the drug-trafficking activities of **BOURGEOIS's** co-defendant, Shannon Duplessis. During the investigation, agents learned that Duplessis, who lived in the New Orleans area, received cocaine from sources in Houston, Texas. Agents learned that these sources provided Duplessis kilogram quantities of cocaine hydrochloride at a cost of approximately \$30,000 per kilogram. Agents further learned that Duplessis regularly utilized **BOURGEOIS** to transport money and cocaine between New Orleans and Houston. After meeting with sources at Duplessis's behest, **BOURGEOIS** would deliver the cocaine to Duplessis, who distributed the cocaine in the New Orleans area.

On February 7, 2015, agents received information that **BOURGEOIS** was driving Duplessis's 2011 Chevrolet Silverado, Louisiana tag number B943092, from New Orleans to Houston. This information was provided to members of the Houston Police Department

("HPD"), who conducted surveillance on the vehicle driven by **BOURGEOIS**. **BOURGEOIS** stayed in Houston for approximately thirteen (13) hours. HPD maintained surveillance on **BOURGEOIS** throughout the night until the morning of February 8, 2015. At approximately 8AM on February 8, agents learned that the vehicle began traveling eastbound on Interstate 10 from the Houston area back towards New Orleans.

DEA Agents picked up surveillance of the vehicle driven by **BOURGEOIS**, and followed the vehicle to a known residence utilized by Duplessis, located at 2752 Bay Street, New Orleans, Louisiana. Duplessis was the only person at the residence when **BOURGEOIS** arrived. After her arrival, Duplessis and **BOURGEOIS** met at the rear driver-side door of the vehicle and began looking in the back-seat area. At that time, agents approached Duplessis and **BOURGEOIS**, and observed in the car a bag containing approximately four kilogram packages of cocaine hydrochloride.

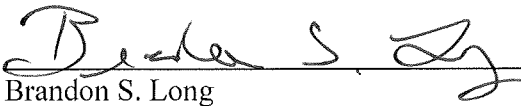
On the scene of his arrest, Duplessis was advised of his *Miranda Warnings*, after which Duplessis admitted that **BOURGEOIS** had traveled to Texas to pick up the four kilograms of cocaine hydrochloride inside the vehicle. According to Duplessis, he had provided **BOURGEOIS** with \$118,000 in United States Currency for the purchase of the cocaine.

**BOURGEOIS** further acknowledges that, before their arrests, **BOURGEOIS** made frequent trips between Houston and New Orleans, carrying money and multiple kilograms of cocaine hydrochloride, in furtherance of her drug conspiracy with Duplessis. **BOURGEOIS** and the government stipulate for purposes of sentencing that **BOURGEOIS** was responsible for receiving and distributing at least fifteen (15) kilograms but less than fifty (50) kilograms of cocaine hydrochloride, through **BOURGEOIS's** own conduct and the reasonably foreseeable conduct of her co-conspirators.

**BOURGEOIS** and the government further stipulate for purposes of sentencing that **BOURGEOIS** was a minor participant in the drug conspiracy with Duplessis.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **BOURGEOIS**, 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 **BOURGEOIS's** plea of guilty to the charged offenses.

 4/27/16  
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Brandon S. Long (Date)  
Assistant United States Attorney

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Joseph P. Raspanti (Date)  
Counsel for Defendant Sabrina Bourgeois

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Sabrina Bourgeois (Date)  
Defendant