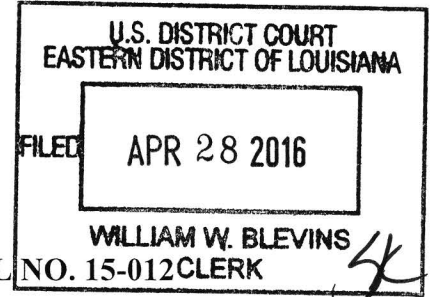


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA



UNITED STATES OF AMERICA

\*

CRIMINAL NO. 15-012  
15-12  
SECTION: "J"

v.

\*

CLARENCE R. SINGLETON  
a/k/a "Smurf"

\*

\* \* \*

FACTUAL BASIS

In support of the defendant, **CLARENCE R. SINGLETON'S**, a/k/a "Smurf" ("SINGLETON"), guilty plea to Counts 1 and 2 of the Sixth Superseding Bill of Information, the Government submits that it could prove the following facts beyond a reasonable doubt, through credible testimony and the production of reliable evidence:

In late 2014, federal agents with the Federal Bureau of Investigations ("FBI"), the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), The Drug Enforcement Administration ("DEA"), and members of the New Orleans Police Department ("NOPD") led Multi-Agency Gang ("MAG") Unit started investigating several acts of violence and narcotics trafficking that had taken place in the city of New Orleans by members of a street gang called the "Mid-City Killers" (also called "MCK"). During the course of this investigation, the agents reviewed numerous police reports, 911 calls, recorded telephone calls, and have spoken to numerous cooperating witnesses. Based on this investigation, agents determined that Joe Lee Miller, a/k/a "Logger Black," Irian Dorsey, and Quincy Lee Jynes, a/k/a "Q," were members and/or associates of the criminal street gang called the "MCK," from approximately 2010 to the present. The members of this gang also associated with Gregory Denson, a/k/a "Pep," Corey Craig Denson, and

**SINGLETON**, a/k/a “**Smurf**,” and other known and unknown individuals. All of these individuals engaged in, among other things, home invasions, robbery of drug dealers, conspiracy to distribute controlled substances, attempted murder, and other acts of violence in the city of New Orleans.

Led by Gregory Denson, some of these individuals worked together for the common purpose of conducting home invasions of known drug dealers, distributing illegal drugs, using and carrying numerous firearms, and other acts of violence all in an effort to make money and to retaliate against other drug dealers.

**COUNTS 1 and 2 of the Fifth Superseding Bill of Information  
Conspiracy to use firearms and Conspiracy to commit Hobbs Act Robbery  
18 U.S.C. § 924(o) and 18 U.S.C. § 1951**

Gregory Denson, Corey Craig Denson, Ellery Boyd, **SINGLETON**, Quincy Lee Jynes, and Joe Lee Miller were involved in a violent home invasion/burglary ring in and around the Metro New Orleans area from at least sometime in May 2013 to the present. The members of this ring targeted other known drug dealers in an attempt to rob them of their drugs and drug proceeds. In addition to the above named individuals, there were three women in the group, Annette M. Robinson a/k/a “Net,” Escrelita Carmouche a/k/a “S,” and Bridgett Miles a/k/a “Ebony” and “Cookie Monster,” who provided intelligence about possible burglary/home invasion hits, scouted the residential locations of drug dealers for future home invasions, knocked on doors to see if individuals were home, and provided transportation for other conspirators to victim sites. A.J. was a confidante of Denson and allowed his white pickup truck to be used for various burglaries and home invasions by the group.

**First Jones Home Invasion/Robbery (relevant conduct)**

On April 4, 2014, the crew (Gregory Denson, Corey Denson, Ellery Boyd, Joe Lee Miller, Quincy Lee Jynes, and **SINGLETON**) travelled to the home of a drug dealer named John M. Jones, a/k/a "Rookie." Jones is the former boyfriend of Annette Robinson, so she was well aware of his drug trafficking activity and knew that he had money and/or drugs at his residence. Jones' residence was located on Giuffrias Street in Metairie, LA. The crew drove to the location in a pickup truck that belonged to A.J. Once they arrived at the location, Gregory Denson remained outside and acted as a lookout. Corey Denson, while using a ladder supplied by A.J., entered an upstairs window. He then allowed Ellery Boyd, Miller, **SINGLETON**, and Jynes entry into the house where they lay in wait for Jones. While they were waiting, Boyd searched the house and located approximately \$40,000.00 - \$60,000.00 in cash, which was from drug proceeds. Gregory Denson paid a portion of the proceeds to his co-conspirators, including **SINGLETON**.

Jones filed a police report concerning the burglary but claimed that the perpetrators only took \$800.00 in currency, \$700.00 in clothes, and four pairs of tennis shoes. There was no sign of forced entry. Jones told the police that the front door was unlocked but closed.


By pleading guilty to Counts 1 and 2 of the Sixth Superseding Bill of Information, **SINGLETON** freely and voluntarily admits that he participated in home invasions and robberies of drug dealers in an attempt to make money and/or to obtain illegal drugs to sell for further retail sale. **SINGLETON** also admits that he and his co-conspirators named herein, conspired to use, carry and possess firearms to rob other drug dealers for drugs and drug proceeds to further their drug trafficking activity and their other crimes of violence.

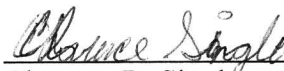
**Limited Nature of Factual Basis**

This proffer of evidence is not intended to constitute a complete statement of all facts known by **SINGLETON** and described by **SINGLETON** 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 proffer is to demonstrate that there exists a sufficient legal basis for **SINGLETON'S** plea of guilty to the charged crimes and to inform the court of some of the relevant conduct in this case and, unless noted otherwise, to stipulate that all acts took place within the Eastern District of Louisiana.

READ AND APPROVED:

  
\_\_\_\_\_  
Michael Simpson  
Assistant United States Attorney

  
\_\_\_\_\_  
Andrew J. Duffy  
Counsel for Clarence R. Singleton

  
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Clarence R. Singleton  
Defendant

  
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