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| UNITED STATES OF AMERICA | * | CRIMINAL DOCKET NO. 14-184 |
| v. | * | SECTION: "B" (2) |
| CHRISTOPHER TAYLOR | | |
| a/k/a "C.T." | * | |

FACTUAL BASIS

Unless stated otherwise, all of the facts set forth herein occurred within the Eastern District of Louisiana.

Cooperating informants and defendants informed DEA Special Agents of the drug trafficking activities of Donald Sampson and TAYLOR. Further investigation revealed that as far back as the early 2000's, Sampson and TAYLOR were cocaine traffickers in the Bogalusa, Louisiana area. Both Sampson and TAYLOR regularly sold quantities of cocaine ranging from 4 ½ ounces to at least one kilogram at a time to drug customers. Though Sampson and TAYLOR individually supplied customers with cocaine, Sampson was TAYLOR'S cocaine source of

supply.

In the mid 2000's, Sampson moved to the Houston, Texas area. While Sampson was living in Houston, Sampson continued to distribute cocaine in the Bogalusa area. Sampson often employed couriers who drove cars to deliver kilogram quantities of cocaine to Bogalusa. Sampson frequently traveled back and forth from Houston to Bogalusa via airplane to ensure the delivery of the drugs and to retrieve drug proceeds. The drugs were often delivered from Houston to TAYLOR in Bogalusa who in turn distributed the drugs on behalf of Sampson to customers in Bogalusa.

One of Sampson's courier's was Veronique Allen. Allen was from Bogalusa but moved to the Houston area after Sampson moved to Houston. On behalf of Sampson, Allen frequently drove cars containing kilogram quantity amounts of cocaine from Houston to Bogalusa for distribution by TAYLOR and others.

In 2009, Sampson returned to Bogalusa where he remained until approximately 2011. During that time period, on a number of occasions, Sampson purchased kilogram quantities of cocaine from a supplier in Bogalusa for distribution. Though Sampson resided in Bogalusa at the time, he continued to have the supplier deliver the drugs to TAYLOR for distribution. While Sampson was purchasing his drugs in Bogalusa for distribution, he noted to the supplier and others that by purchasing his drugs locally, he no longer had to employ Allen to drive with the drugs from Houston to Bogalusa.

Sampson returned to Houston in or about 2011. Once in Houston, he resumed his drug trafficking activities from Houston by re-employing couriers, including Allen, to deliver his drugs to Bogalusa. On April 10, 2012, Louisiana State Police conducted a traffic stop of Allen in

a Nissan Rogue bearing Texas license plate number BH7Z934 on Interstate 10 in St. Martin Parish. Allen consented to a search of the vehicle. During the search, the trooper found \$20,320.00 in cash concealed in a sealed box of "Gain" laundry detergent. The trooper then deployed a K-9 on the vehicle and the K-9 alerted to the vehicle, detecting a narcotics odor.

After Allen was Mirandized, she said she knew nothing of the money in the detergent box. She said she bought the detergent and other cleaning items the previous week. She said that she previously removed all of the cleaning items except the detergent from the vehicle. Officers processed the money for forfeiture and no one filed a claim for the money.

On April 13, 2013, almost exactly one year later, Louisiana State Police conducted a traffic stop on a 2013 Toyota Venza, bearing Texas license plate number BLM4503 on Highway 21 north of Covington, Louisiana. The vehicle was a rental and the driver was Allen. When questioning Allen regarding her travel plans, the trooper became suspicious when Allen gave inconsistent answers to his questions. After receiving consent from Allen to search the vehicle, the trooper found 2,203 grams of cocaine inside of a sealed "Tide" laundry detergent box. The trooper then arrested Allen.

During post *Miranda* questioning, Allen initially stated that she knew nothing about the cocaine found in the vehicle. She said she was driving from Houston to Bogalusa for a funeral. When asked why she was driving a rental car, Allen said that her personal vehicle was broken. Regarding the detergent box, Allen said that she purchased it from Target in Houston then drove toward Bogalusa. She added that she purchased a number of items from Target to bring to her mother in Bogalusa.

The trooper then asked Allen about the money seizure that occurred a year earlier. Allen said that she purchased that box of detergent in Louisiana before she began driving back to Texas and did not know it contained money. The trooper questioned Allen's story then asked her again about the cocaine. Allen then told the trooper that TAYLOR told her to leave her car unlocked while she was in the store and to call him when he arrived in Bogalusa. The trooper asked about the money seizure and Allen said that before she left Bogalusa headed to Texas, TAYLOR picked up her vehicle to be washed. When he returned the car, she left for Texas. While driving to Texas, the trooper stopped her and found the money. The trooper asked Allen what she was supposed to do with the money when she arrived in Texas. Allen responded, "I don't know. I was never told what to do." Allen reiterated that TAYLOR put the money in the detergent box and when the trooper seized it, Allen nor TAYLOR ever discussed the seizure.

Agents obtained video from the Target store in Houston where Allen claimed she purchased the detergent and other items to bring to her mother in Bogalusa. The video clearly showed Allen leaving the store with purchased items – all except for the detergent. Also, a review of the receipt for the purchases made from the Target shows that Allen did not purchase the detergent with the other items as she claims she did. When asked about this, Allen said she went back into the store to buy the detergent. However, she could not provide a receipt. Allen pleaded guilty to possession with intent to distribute cocaine and was sentenced to 18 years imprisonment.

After the officers seized the drugs from Allen and arrested her, they obtained a state search warrant for TAYLOR'S residence. During the search, officers found cocaine residue in two microwaves, indicating the cooking of cocaine hydrochloride into crack.

Once alerted to Allen's dealings, agents began conducting physical and GPS surveillance on Allen. Surveillance confirmed frequent round trips made by Allen from Houston to Bogalusa and back with a 24 hour turnaround. Surveillance also placed Sampson with Allen at her residence in Houston frequently.

DEA agents have been targeting Sampson for a number of years and maintained surveillance on him as well. Agents noticed that Sampson made frequent trips to Bogalusa from Houston by plane and car, as the plane flew to New Orleans, and often returned a day or two later if not the same day. On several occasions that Sampson flew from Houston, he did not check in any luggage before boarding the flight. On those occasions, he checked in a bag onto the return flight to Houston.

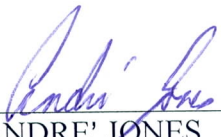
On March 18, 2014, N.O. DEA agents notified Houston DEA that Sampson was flying back to Houston from Bogalusa and that he may be carrying large amounts of currency. Houston agents maintained surveillance at the airport and approached Sampson after he obtained his bag from the baggage carousel. While questioning Sampson about his travels, agents noticed his nervous behavior and asked for consent to search his bag. Sampson consented to the search and agents found \$25,410.00 in the bag and his pockets. Sampson told the agents that he was a car salesman and that the money belonged to him as profits from a car detail shop. A K-9 checked the money and alerted to the presence of narcotics on the money. Agents seized the money and gave Sampson a receipt.

On August 28, 2014, DEA Special Agents and Louisiana State Police Officers arrested TAYLOR at his residence at 1103 Donnel Street in Bogalusa, Louisiana. Pursuant to the arrest, agents and officers searched the residence. In the master bedroom, on TAYLOR'S side of the

bed, officers found a Beretta, Model 96, .40 caliber pistol, bearing serial number BER434141. A records check confirmed that the firearm was stolen. In the bathroom of the residence, officers found inside a black bag approximately 16 grams of cocaine base ("crack") wrapped in a clear plastic bag. Agents field tested the drugs which tested positive for the presence of crack.

Regarding the firearm found in TAYLOR'S residence, TAYLOR acknowledges that he possessed the firearm. At the time that TAYLOR possessed the firearm, he had a prior felony conviction that precluded him from possessing a firearm. TAYLOR acknowledges that on or about October 26, 2004, TAYLOR pled guilty to Possession with Intent to Distribute Cocaine, in violation of La. R.S. 40:967A, in case number 103255 in the Nineteenth Judicial District Court. He was sentenced to five years imprisonment. Both TAYLOR and the Government also acknowledge and agree that the firearm was manufactured outside the state of Louisiana and thus had to travel through interstate commerce to enter into the state of Louisiana.

Regarding the conspiracy, the Government and TAYLOR stipulate and agree that his conduct, which includes the reasonably foreseeable conduct of his co-defendants, involved at least 15 kilograms but less than 50 kilograms of cocaine hydrochloride.



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