

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

UNITED STATES OF AMERICA	*	CRIMINAL NO. 15-200
v.	*	SECTION: "J"
REGINALD WASHINGTON	*	
	* * *	

FACTUAL BASIS

The above-named defendant, Reginald WASHINGTON (hereinafter, "WASHINGTON"), has agreed to plead guilty pursuant to a plea agreement with the Government to Count One of the Superseding Bill of Information. 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 WASHINGTON:

Count One - Drug Trafficking Conspiracy

Beginning on a date unknown, but not later than February 6, 2015, and continuing until on or about August 6, 2015, in the Eastern District of Louisiana, and elsewhere, WASHINGTON conspired with codefendants Thomas GORDON, Donald EALY, Martha QUINONES, Kevin GONZALES, Kenneth HARRIS, Wilbert CLARK, and Earl BROWN, and others, to distribute and to possess with the intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin.

On multiple occasions during the conspiracy, WASHINGTON and GORDON discussed WASHINGTON's role in acting as a "middle man" between GORDON and prospective heroin customers. For instance, on July 21, 2015, WASHINGTON discussed his desire to broker a deal between an unindicted coconspirator and GORDON. In a text communication with GORDON,

WASHINGTON stated, "Hey I need to talk to u can u let someone test a half of gram he a big spender oz for real." In this communication, WASHINGTON was referencing the introduction of GORDON to a potential heroin customer who purchased ounce quantities of heroin, and was asking if GORDON would be willing to provide this customer with a small amount of heroin to test as a sample. GORDON then directed WASHINGTON to his residence, where GORDON provided WASHINGTON with a small amount of heroin. WASHINGTON later texted GORDON and inquired, "Hey they have something on it or its raw." In this communication, WASHINGTON was asking GORDON whether the sample heroin had already been diluted with a cutting agent.

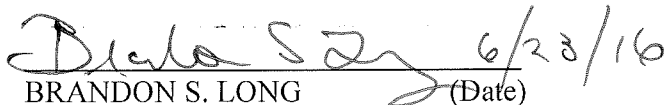
The following day, in a phone call between WASHINGTON and GORDON, WASHINGTON discussed potential heroin customers with GORDON, one of whom purchased "4½ and up." In this communication, WASHINGTON was explaining to GORDON that he could act as a "middle man" between this customer and GORDON for the customer to purchase 4.5 or more ounces of heroin. WASHINGTON and GORDON then agreed that GORDON would sell WASHINGTON an ounce of heroin for \$2200, and WASHINGTON would then charge the customer either \$2500 or \$2600 per ounce.

On August 1, 2015, WASHINGTON sent a text communication to GORDON, stating, "Zip I'm bout to come get it." In this communication, WASHINGTON was telling GORDON that he was planning to meet with GORDON to obtain one ounce (approximately 28 grams), or a "zip," of heroin. WASHINGTON did, in fact, meet with GORDON and obtain one ounce of heroin. A short time later, WASHINGTON sent a text communication to GORDON, stating, "Hey said he can't do nothing wit this," followed by, "He said he only could put a 7 on it." In

these communications, WASHINGTON was informing GORDON that the quality of the heroin was weak, and that the heroin customer to whom WASHINGTON had sold the heroin was only able to add "7" grams of cutting agent to the ounce of heroin.

WASHINGTON and the government stipulate for the purposes of sentencing that GORDON was responsible for conspiring to distribute and possess with intent to distribute at least 100 grams but less than 400 grams of heroin, through WASHINGTON's own conduct and the reasonably foreseeable conduct of his co-conspirators.

WASHINGTON's involvement in the conspiracy charged in Count One of the Superseding Bill of Information is not limited to the facts contained in this stipulated factual basis. These facts are merely a summary of WASHINGTON's involvement in this conspiracy and are presented in this document to support his plea of guilty to Count One in the Superseding Bill of Information.


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Attorney for Defendant

REGINALD WASHINGTON (Date)
Defendant