

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO. 15-310

v.

*

SECTION: "G"

DELRONE MOORE

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FACTUAL BASIS

Should this matter proceed to trial, the United States will prove the defendant, **Delrone MOORE**, guilty beyond a reasonable doubt of knowingly and intentionally distributing a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C). The government would establish the following through credible testimony and the production of reliable evidence:

In the Fall of 2015, the Jefferson Parish Sheriff's Office ("JPSO") contacted agents of the Drug Enforcement Administration ("DEA") to inform the DEA that a JPSO undercover detective (the "UC") had the ability to conduct controlled undercover purchase of heroin from **MOORE**. DEA initiated an investigation into **MOORE**.

On October 14, 2015, at approximately 5:30 pm, the UC met with **MOORE** in Kenner, Louisiana. During the meeting, the UC purchased approximately one half ounce of heroin from **MOORE** for \$1,400.00 in official funds. The calls between **MOORE** and the UC leading up to the buy were recorded. The hand-to-hand transaction took place in the UC's undercover vehicle, in a parking lot at the Esplanade Mall, and was captured on that vehicle's video recording system. A laboratory test confirmed that the purchased substance was heroin (net weight of 13.9 grams).

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On November 12, 2015, at approximately 12:30 p.m., the UC met with **MOORE** in Kenner, Louisiana and conducted a second controlled undercover purchase. On the listed date, the UC purchased approximately one ounce of heroin from **MOORE** for \$2,500.00 in official funds. The calls between **MOORE** and the UC leading up to the buy were recorded. The hand-to-hand transaction took place in the UC's undercover vehicle and was captured on that vehicle's video recording system. A laboratory test confirmed that the purchased substance was heroin (net weight of 27.6 grams).

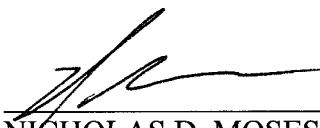
The government and defendant **MOORE** agree and stipulate that for sentencing purposes the government could prove that the amount of drugs that was distributed by **MOORE** included a total of 41.5 grams of heroin.

At trial the government would introduce the heroin purchased from **MOORE** on October 14, 2105, the heroin purchased from **MOORE** on November 12, 2015, lab reports on the purity of the heroin, recordings of conversations between **MOORE** and the UC, audio and video recordings of the two transactions between **MOORE** and the UC, testimony of the UC, testimony of the investigating agents and forensic chemist, and the statements of **MOORE** and other witnesses.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **MOORE** or 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 **MOORE**'s plea of guilty to the charged offenses in Counts 1 and 2, and to stipulate that all acts took place within the Eastern District of Louisiana.


READ AND APPROVED:



NICHOLAS D. MOSES 9/22/16
Assistant United States Attorney DATE



GARY V. SCHWABE JR. 9-22-16
Counsel for Defendant Delrone Moore DATE



DELRONE MOORE 9-22-16
Defendant DATE