

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

UNITED STATES OF AMERICA * **CRIMINAL NO: 18-081**
v. * **SECTION: "F"**
ALBERT VEREEN, JR. *
* * *

FACTUAL BASIS

The above-named defendant, **ALBERT VEREEN, JR. ("VEREEN")**, has agreed to plead guilty to Count One of the Indictment. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony, drug evidence, Title III wire and electronic interceptions, and other reliable evidence, the following facts. Unless stated otherwise, these acts occurred in the Eastern District of Louisiana:

On May 12, 2014, Drug Enforcement Administration (DEA) Task Force Officer (TFO) Chris Johnson met with a confidential source (CS-1), who placed a recorded phone call to **VEREEN**. CS-1 ordered a "bill," *i.e.*, \$100, of crack cocaine and agreed to meet **VEREEN** in Port Sulphur, LA, where **VEREEN** lived. Ultimately, CS-1 and **VEREEN** met at a car wash in the 100 block of Azalea Drive, Port Sulphur, LA. On the way to the car wash, agents drove by **VEREEN's** residence (27320 Highway 23, Port Sulphur) and saw **VEREEN** enter a 2003 white GMC Envoy. The Envoy was registered to Tiffany Washington, **VEREEN's** girlfriend. **VEREEN** arrived at the car wash in the Envoy. CS-1 walked to **VEREEN's** driver-side window and gave **VEREEN** \$100 in controlled-purchase money. **VEREEN** gave CS-1 five off-white rock objects consistent with crack cocaine. Lab results showed that the five rocks did contain cocaine. Before departing, CS-1 saw that **VEREEN** was in possession of additional rocks in a clear plastic bag.

On May 16, 2014, TFO Johnson met with CS-1, who again called **VEREEN** to set up a controlled purchase of crack cocaine. They agreed to meet by “Barry’s,” which is the same car wash in the 100 block of Azalea Drive. **VEREEN** arrived driving the same GMC Envoy. CS-1 walked to the driver’s window and gave **VEREEN** \$100 in exchange for five off-white rock objects. Lab results showed the five rocks did contain cocaine.

On May 19, 2014, TFO Johnson met with CS-1, who called Coconspirator-1 to arrange the purchase of crack cocaine. CS-1 told Coconspirator-1 that he/she wanted a “bill.” Coconspirator-1 stated that he was in Port Sulphur and waiting for someone to “get back” so he could “put it together.” Later, Coconspirator-1 and CS-1 spoke again. Coconspirator-1 told CS-1 to go to **VEREEN**’s residence at 27230 Highway 23. Upon arriving, Coconspirator-1 and **VEREEN** were with a group of others, apparently having a crawfish boil. **VEREEN** went to CS-1’s car and handed over several pieces of off-white rock substance in exchange for \$100. Lab results showed the rocks contained cocaine.

On June 10, 2014, TFO Johnson met with CS-1 to perform another controlled purchase of crack cocaine from **VEREEN**. CS-1 called **VEREEN** and they agreed to meet. CS-1 traveled toward Boothville, LA, and ultimately met **VEREEN** on Highway 11 near Oak Road in Empire, LA. There, CS-1 gave **VEREEN** \$100 in exchange for five off-white rock objects. According to CS-1, the rocks appeared to be wet as if they had recently been cooked from powder into crack cocaine. Lab results showed the rocks contained cocaine.

On July 30, 2014, TFO Johnson met with CS-1 to perform another controlled purchase of crack cocaine from **VEREEN**. CS-1 called **VEREEN** and stated that he/she wanted a “60,” or \$60 of cocaine. CS-1 and **VEREEN** agreed to meet at the car wash in the 100 block of Azalea

Road. There, CS-1 gave VEREEN \$60 in exchange for three off-white rock objects. Lab results showed the rocks contained cocaine.

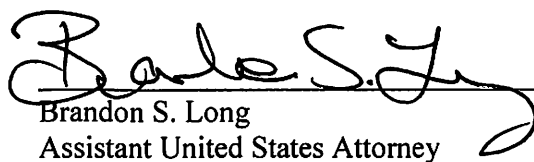
On August 6, 2014, law enforcement executed a search warrant at 27320 Highway 23, Port Sulphur, VEREEN's residence. Agents waited for VEREEN to leave his house at 6AM, then performed a traffic stop on VEREEN based on their knowledge that VEREEN was driving on a suspended license. VEREEN's car emitted an odor consistent with marijuana. Agents detained VEREEN and advised him of his Miranda rights. Agents searched VEREEN and recovered \$4,314 in US currency. Agents also recovered a marijuana cigar from the car. VEREEN traveled with the agents back to his house and was cooperative. Agents executed the search warrant at the home. Inside of the home were eight juveniles (six females and two males) along with VEREEN's girlfriend, Tiffany Washington. VEREEN admitted that he had "about an ounce" of cocaine in a drawer in his bedroom dresser. Agents ultimately recovered approximately 35 grams of powder cocaine (lab results confirmed) in a drawer in his dresser. Agents also recovered two digital scales, baking soda, plastic bags, and marijuana from different areas inside the residence. VEREEN acknowledged that the items inside the residence were his, and that Washington had no knowledge of the items.

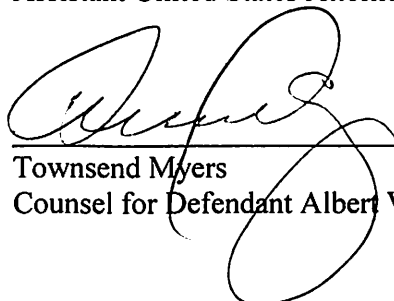
VEREEN voluntarily agreed to interview with law enforcement. During his interview, VEREEN admitted that he had been buying 1-2 ounces of powder cocaine approximately 2-3 times per week over the previous year. VEREEN acknowledges that codefendant Jerrell Encalade was one of his sources of supply for cocaine. VEREEN acknowledges that, even after his August 6, 2014 arrest, VEREEN continued to purchase ounce-quantities of cocaine from Encalade, which VEREEN resold in the Easter District of Louisiana.

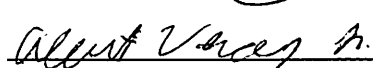
VEREEN and the government stipulate for the purposes of sentencing that VEREEN was responsible for at least 500 grams but less than 2 kilograms of a mixture or substance containing a detectable amount of cocaine hydrochloride, through VEREEN's own conduct and the reasonably foreseeable conduct of his co-conspirators.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts, 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 VEREEN's plea of guilty to the charged offense.

 3/20/19
Brandon S. Long (Date)
Assistant United States Attorney

 3/20/19
Townsend Myers (Date)
Counsel for Defendant Albert Vereen, Jr.

 3/20/19
Albert Vereen, Jr. (Date)
Defendant