

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

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 19-175
v.	*	SECTION: "E"
MICHAEL LEWIS	*	
a/k/a "Michael Louis"	*	
	* * *	

FACTUAL BASIS

Defendant **MICHAEL LEWIS**, a/k/a "Michael Louis," ("LEWIS") has decided to enter a plea of guilty to the Superseding Bill of Information in the above-captioned matter. Should this matter have proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt through credible testimony and reliable evidence. The facts outlined herein occurred within the jurisdiction of the Eastern District of Louisiana.

Agents with the Drug Enforcement Administration ("DEA") conducted an investigation of the drug distribution of a group of individuals located in and around the parishes of Jefferson, Orleans, and St. Bernard, located within the Eastern District of Louisiana. Agents identified the following individuals, among others, who were members of a drug distribution conspiracy: **LEWIS**, Demarco Ford, Taurus Russell, a/k/a "Scrappy," Thomas Landry, Corey Dunn, Bobby Franklin, a/k/a "B-Trey," a/k/a "Trey," Corey Enclarde, a/k/a "Murda," Christopher Harris, a/k/a "Grove," Romalis Harris and others.

AUSA	<u><i>BLP</i></u>
Defendant	<u><i>ML</i></u>
Defense Counsel	<u><i>Kay</i></u>

During the course of this investigation, agents obtained court-authorized Title III wiretap orders on four telephones: a telephone used by Franklin, a/k/a "B-Trey," a/k/a "Trey," telephone number [REDACTED] ("the 327 Wiretap"), a telephone used by Corey Dunn, telephone number [REDACTED] ("the 439 Wiretap"), a telephone used by Corey Dunn, telephone number [REDACTED] ("the 351 Wiretap"), and a telephone used by Corey Dunn, telephone number [REDACTED] ("the 228 Wiretap").

Through this investigation, agents learned that Franklin and Dunn were a cocaine base (crack cocaine) and cocaine hydrochloride distribution organization. Upon information and belief, the Franklin and Dunn drug trafficking organization ("DTO") began operating on or about October 2018 and continued to do so until on or about August 2, 2019. DEA agents were able to develop information about the charged conspiracy based on controlled purchases and intercepted communications between Franklin and Dunn and their co-conspirators.

Should this matter have proceeded to trial, TFO [REDACTED] would testify that intercepted hundreds of telephone calls during his investigation of the Dunn/Franklin drug trafficking organization. During that time, TFO [REDACTED] heard members of the drug trafficking organization use code words to thwart law enforcement from intercepting communications related to drug trafficking/dealing. Additionally, TFO [REDACTED] would testify that based on his training and experience as a narcotics detective and his tenure as a task force officer with DEA, he has become familiar with the code language that drug dealers will often use to disguise conversations about narcotics activity. TFO [REDACTED] has become familiar with the code words used to refer to different types of controlled substances distributed and possessed with the intent to distribute by the organization, as well as quantities used distributed/possessed by the organization.

June 6, 2019 purchase between Lewis and Dunn

On June 4, 2019, at approximately 3:44 p.m., agents intercepted a communication between Corey Dunn and LEWIS. During the telephone communication, LEWIS told Dunn, "I need you one time." Dunn replied, "I'm on my way." LEWIS and Dunn negotiated the sale of one ounce (28 grams) of cocaine hydrochloride. Members of the conspiracy commonly used numerical terms as code words to conceal their communications from law enforcement.

Two days later, on June 6, 2019, LEWIS contacted Dunn via telephone. During the intercepted communication, Dunn told LEWIS that he was on his way to meet with him. Based on the June 4, 2019, communication, agents knew that Dunn and LEWIS were meeting so that LEWIS could purchase narcotics from Dunn. Prior to the meeting, LEWIS contacted Dunn a second time to request that Dunn, "Bring me a three," meaning that LEWIS was asking Dunn to sell him three ounces (approximately 84 grams) of cocaine hydrochloride. LEWIS and Dunn met. During the meeting, Dunn sold LEWIS three ounces (approximately 84 grams) of cocaine hydrochloride in exchange for U.S. currency.

Sentencing Stipulation


For the purposes of sentencing only, the parties stipulate and agree that the defendant, **LEWIS**, is responsible for the following drug quantity through his own actions and the reasonably foreseeable actions of his co-conspirators. The parties agree that **LEWIS** is responsible for conspiring to distribute and/or possess with the intent to distribute at least 50 grams, but less than 100 grams of cocaine hydrochloride.

AUSA BUP
Defendant ML
Defense Counsel Ry


Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by LEWIS. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for LEWIS's plea of guilty to the charged offenses.

READ AND APPROVED:

 06/15/2021
BRITTANY L. REED Date
Assistant United States Attorney

 6/15/2021
RACHEL YAZBECK Date
Attorney for Michael Lewis

 6/15/2021
MICHAEL LEWIS Date
Defendant