

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 22-064
v.	*	SECTION: "T"
KEITH JENKINS	*	
	*	
	*	
	*	

FACTUAL BASIS

The defendant, **Keith Jenkins** ("JENKINS") has agreed to plead guilty to participating in a conspiracy to distribute 5 kilograms or more of cocaine hydrochloride , in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846 as charged in Count 1 of the Indictment. He has also agreed to plead guilty to possession with the intent to distribute 500 grams or more of cocaine hydrochloride, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), as charged in Count 2 of the indictment.

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the bill of information pending against the defendant.

Since April of 2021, Agents of the DEA have been investigating the drug trafficking activities of several individuals in St. John the Baptiste Parish. During the course of this investigation, **Keith JENKINS** was identified as distributor of kilogram quantities of cocaine. A DEA confidential informant told agents that he personally knew that **JENKINS** was a distributor

AUSA  
Defendant  
Defense Counsel

*MEZ*  
*[Signature]*

of kilogram quantities of cocaine.

On February 10, 2022, at approximately 10:34 a.m., a St. John the Baptist Parish Sheriff's Office ("SJPSO") K-9 officer conducted a traffic stop on a 2016 Land Rover Range Rover, white in color, bearing Louisiana license plate [REDACTED] ("the white Range Rover"), for committing a moving infraction in Laplace, Louisiana. During this stop, contact was made with **JENKINS**, who was driving and was the vehicle's only occupant. The SJPSO K-9 subsequently conducted a free air sniff around the exterior of the white Range Rover and gave a positive alert, indicating that controlled substances were located inside the vehicle. A subsequent probable cause search of the white Range Rover rendered a black backpack on the rear floorboard, which contained approximately one kilogram of suspected cocaine. The kilogram of cocaine was seized as evidence. A field test was then conducted on the kilogram of cocaine, which rendered positive presumptive results for the presence of cocaine.

**JENKINS** was arrested and transported to Sherman Walker Correctional Facility ("SWCF") in Laplace. Shortly thereafter, DEA agents made contact with **JENKINS** in an interview room at the SWCF. After introductions were made, agents advised **JENKINS** of his *Miranda Warnings*. **JENKINS** stated that he understood his constitutional rights, waived his right to legal counsel, and consented to be interviewed.

[REDACTED]

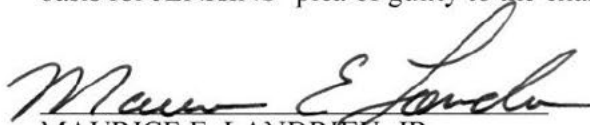
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AUSA *met*  
 Defendant *KP*  
 Defense Counsel *[Signature]*

[REDACTED]

The Government and the defendant agree and stipulate that the defendant should be held accountable for at least five kilograms but not more than 15 kilograms of cocaine hydrochloride, for sentencing purposes. Any other drugs recovered during the investigation were of such small quantities that they are insignificant for sentencing purposes.


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 JENKINS' plea of guilty to the charged offense.

  
MAURICE E. LANDRIEU, JR.  
Assistant United States Attorney

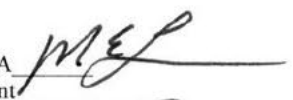

4/26/22  
Date

  
KEITH JENKINS  
Defendant

4-26-2022  
Date

  
DAVID BOURLAND  
Attorney for Defendant

4-26-2022  
Date

AUSA   
Defendant   
Defense Counsel