

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 1:17-cr-283
	)	
EDNA AMINATA CONTEH,	)	
	)	The Hon. Liam O'Grady
Defendant.	)	

STATEMENT OF FACTS

The United States and the defendant, Edna Aminata Conteh (hereinafter "the Defendant"), agree that the United States would have proven the following facts at trial, beyond a reasonable doubt, with admissible and credible evidence:

1. On or about July 1, 2016, in Alexandria, Virginia, within the Eastern District of Virginia, the Defendant did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") by stating to ATF special agents that the firearms she purchased were stolen from her vehicle. This statement and representation was false because, as the Defendant then and there knew, the firearms had previously been sold to other individuals.

2. In and around May 2016, the Defendant turned 21 years old. Once, the Defendant turned 21 years old she was able to purchase handguns and ammunition from a federal firearms licensee ("FFL"). Shortly thereafter, the Defendant began purchasing firearms. The Defendant purchased the following eight firearms between May 20 and June 23, 2016:

a. May 20, 2016 — Kel-Tec, P11, 9mm pistol, serial number AA9876;

- b. May 31, 2016 — Walther, PPS, 9mm pistol, serial number AL4032;
- c. June 11, 2016 — Taurus, 82, .38 Spl revolver, serial number 2016021;
- d. June 13, 2016 — Smith & Wesson, BG380, .380 pistol, serial number KCV6491;
- e. June 13, 2016 — Smith & Wesson, M&P, .40 pistol, serial number MPE4520;
- f. June 17, 2016 — Walther, PK380, .380 pistol, serial number WB028825;
- g. June 18, 2016 — Ruger, LC380, .380 pistol, serial number 324-99277; and
- h. June 23, 2016 — Taurus, 85, .38 Spl, Revolver, serial number H116919.

3. Based on the number of firearms that the Defendant purchased shortly after turning 21 years old, ATF opened an investigation into the Defendant for the suspected purchasing of firearms for individuals other than herself.

4. On July 1, 2016, ATF special agents interviewed the Defendant. Agents explained to the Defendant that they were investigating the location of the firearms that the Defendant purchased. During this voluntary interview, the Defendant provided a number of materially false and misleading statements. For instance, when she was asked where the eight (8) firearms were located, the Defendant stated all the firearms were stolen from her vehicle after it was towed to a nearby gas station. This statement was materially false and misleading because as the Defendant well knew one of her friends ("Individual 1") had sold the weapons to various individuals.

5. A few days after ATF special agents interviewed the Defendant, agents learned that one of the firearms purchased by the Defendant was recovered by the Alexandria Police Department at a homicide scene in north Old Town near the Braddock Road metro station. More

specifically, law enforcement recovered the Smith & Wesson .380 pistol bearing serial number KCV6491 from the homicide victim.

6. Based on this new information, ATF special agents again interviewed the Defendant on July 5, 2016. During this interview, the Defendant changed some of her previous statements; however, she continued to insist that the firearms were stolen from her vehicle. The Defendant also insisted that no one knew she purchased firearms. Further investigation revealed, however, that the Defendant was accompanied by Individual 1 and another male to at least one FFL, where she purchased firearms. Further, these statements were again materially false and misleading because the Defendant knew that Individual 1 had sold the firearms to various individuals.

7. After this interview, agents learned that the Alexandria Police Department also recovered another firearm purchased by the Defendant from an alley near the same homicide scene. More specifically, law enforcement recovered the Taurus .38 special revolver bearing serial number H116919.

8. On July 30, 2016, law enforcement recovered the Kel-Tec 9mm pistol bearing serial number AA9876, while executing a search warrant at a residence.

9. On August 26, 2016, law enforcement recovered the Walther .380 pistol bearing serial number WB02882 in Prince George's County, Maryland, during a traffic stop.

10. The acts taken by the Defendant in furtherance of the offense charged in this case, including the acts described above, were done willfully, knowingly, and with the specific intent to violate the law, and were not committed by mistake, accident or other innocent reason.

11. This statement of facts includes those facts necessary to support a guilty plea. It does not include each and every fact known to the Defendant, or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the Defendant's case.

12. This statement of facts shall be admissible as a knowing and voluntary confession in any proceeding against the Defendant regardless of whether the plea agreement is presented to or accepted by a court. Moreover, the Defendant waives any rights that the Defendant may have under Fed. R. Crim. P. 11(f), Fed. R. Evid. 410, the United States Constitution, and any federal statute or rule in objecting to the admissibility of the statement of facts in any such proceeding.

Respectfully submitted,

Dana J. Boente
United States Attorney

By:


Carina A. Cuellar
Assistant United States Attorney

Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the Defendant, Edna Aminata Conteh, and the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

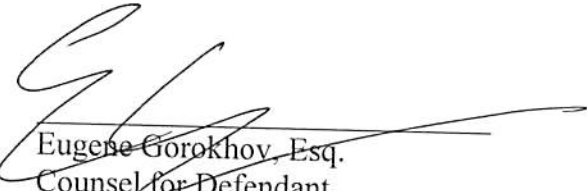
Date: 12/1/17



Edna Aminata Conteh
Defendant

Defense Counsel Signature: I am counsel for the Defendant in this case. I have carefully reviewed the above statement of facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

Date: 12/1/17



Eugene Gorokhov, Esq.
Counsel for Defendant