

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

UNITED STATES OF AMERICA

*

CRIMINAL NO: 13-114

v.

*

SECTION: “K”

SANDRA RENEE KEITH

*

* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts beyond a reasonable doubt to support the allegations in the Indictment now pending against the Defendant, **SANDRA RENEE KEITH** (also referred to as “Defendant” or “Keith”). The Defendant has agreed to plead guilty to Count 2 of the Indictment, charging her with making false statements to an agency of the United States, in violation of Title 18, United States Code, Section 1001.

A Special Agent from the Drug Enforcement Agency (“DEA”) would testify that on May 6, 2013, the Defendant, **SANDRA RENEE KEITH**, resided at an apartment located at XX Whitmar Drive in Hammond, Louisiana. At approximately 8:15 a.m., Special Agents knocked on Defendant’s door. When **KEITH** answered the door, Special Agents informed her that they had a federal arrest warrant for Michael D. Brumfield (“Brumfield”). The agents were wearing vests that said “Police”, and there was a DEA badge on the vest. **KEITH** informed the agents that Brumfield was not at her apartment, but was residing with his mother. **KEITH** further stated that she had not spoken to Brumfield since Sunday. An agent asked **KEITH** if they

could come in and look around her apartment, and she stated that first she wanted to change her clothes. When **KEITH** came back to the door, agents again asked Defendant if Brumfield was inside the apartment. **KEITH** responded “No” and proceeded to let the agents enter the apartment to look for Brumfield. As agents entered the apartment, an agent observed, in a room to the left, men’s clothes and tennis shoes on the floor near a bed. Agents asked **KEITH** about the men’s clothing and she did not respond. An agent then located Brumfield hiding in the bathroom shower. A Special Agent from the DEA would further testify that **KEITH** apologized for lying to agents about Brumfield’s whereabouts. A certified copy of the federal arrest warrant for Brumfield would be offered as evidence at trial.

Both the Government and Defendant, **SANDRA RENEE KEITH**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the Defendant is pleading guilty and that the government would have proved these facts beyond a reasonable doubt at trial.

READ AND APPROVED:

STEPHEN D. LONDON, ESQ. (Date)
Counsel for Defendant

JULIA K. EVANS (Date)
Assistant United States Attorney

SANDRA RENEE KEITH (Date)
Defendant