

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

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.: 10-329
v.	*	SECTION: "I"(5)
SHAYNE LEBLANC	*	
	*	*

FACTUAL BASIS

The above-named defendant, **SHAYNE LEBLANC** ("LEBLANC"), has agreed to plead guilty a Bill of Information in this matter. The following proffer of the Government's evidence is intended only to provide the Court with enough evidence to satisfy the mandate of Rule 11(b)(3) of the Federal Rules of Criminal Procedure. This factual basis is not intended to be a disclosure of all the evidence available to the Government nor, to the extent it makes representations concerning anything the defendant said, is it a recitation of all that the defendant said.

Should this matter proceed to trial, the United States will prove beyond a reasonable doubt, through credible testimony of special agents of the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") and the Federal Bureau of Investigation ("FBI"), state and local law enforcement agencies, lay witnesses, and the production of reliable evidence, the following facts:

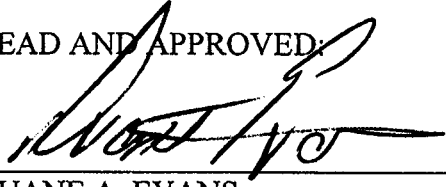
Beginning on a date unknown to the United States Attorney, but prior to on or about October 2010, and continuing to January 27, 2012, in the Eastern District of Louisiana and elsewhere, the defendant, **LEBLANC**, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the United States Attorney, to manufacture and to possess with intent to distribute a quantity of cocaine base. **LEBLANC** was familiar with both **MELVIN HUDSON a/k/a "Kane", a/k/a "Keenan" ("HUDSON")** and unindicted co-conspirator "John Doe" ("Doe") because they were both members of a gang called the Harvey Hustlers. For several years, **LEBLANC** purchased quantities of cocaine base ("crack") from **HUDSON**, Doe, and **TOREY RICHARDSON ("RICHARDSON")** on behalf of himself and others. Also, **RICHARDSON** is a Harvey Hustler and co-conspirator. Typically, **LEBLANC** purchased on behalf of himself and others \$20 to \$40 amounts of crack during one to three week periods from co-conspirators and others.

On or about October 1, 2010, **LEBLANC** and Witness 1 were inside **LEBLANC**'s residence located in Jefferson Parish, Louisiana. During the day, **HUDSON** and Doe visited **LEBLANC** at his residence. **LEBLANC** allowed both **HUDSON** and Doe to enter his home. Doe requested that both he and **HUDSON** be allowed to use **LEBLANC**'s kitchen to manufacture crack. **LEBLANC** permitted the co-conspirators to use his stove to cook crack. At times, **LEBLANC** entered his kitchen to check on their progress. **LEBLANC** estimated that the amount of crack was approximately one ounce. Witness 1 will testify that the amount of crack appeared to be approximately one-fourth of a two-cup Pyrex dish. Witness 1 was a crack addict at the time who purchased drugs from Doe on prior occasions. After cooking the crack, **HUDSON** bagged it and distributed a small amount to **LEBLANC** and Witness 1. Witness 1

will confirm that the substance given to her was indeed, crack. HUDSON and Doe then departed LEBLANC's residence.

A chemist employed by the Jefferson Parish Sheriff's Office analyzed some of the illegal narcotics distributed by various Harvey Hustler members during the course of the conspiracy and determined that it was cocaine base, a Schedule II narcotic drug controlled substance.

READ AND APPROVED:



DUANE A. EVANS
Assistant United States Attorney

1/10/13

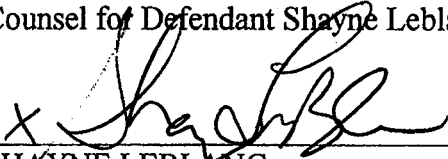
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ROBERT JENKINS, ESQ.
Counsel for Defendant Shayne Leblanc

12-29-12

DATE



SHAYNE LEBLANC
Defendant

12-29-12

DATE