

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No.: 2:17-cr-22-2

v.

Hon. Robert J. Jonker
Chief United States District Judge

JESSICA LYNN TOBIAS,

Defendant.

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STIPULATION OF UNCONTESTED FACTS

NOW COMES the Defendant, Jessica Lynn Tobias by and through her attorney Assistant Federal Public Defender Elizabeth A. LaCosse and the United States of America, by and through their attorneys, Andrew Byerly Birge, United States Attorney, and Paul D. Lochner, Assistant United States Attorney, and hereby stipulate to the following as uncontested facts:

1. That on April 13, 2012, as part of a controlled purchase involving the Defendant, SANE officers seized four small aluminum foil folded bindles, purchased as heroin.

2. That on May 30, 2012, Karen S. Brooks, a Forensic Scientist with the Controlled Substances Unit of the Forensic Science Division of the Michigan Department of State Police, conducted a drug screen analysis on one of the four foil

packages of powder that was seized as a part of the controlled purchase on April 12, 2012. As reflected in the Laboratory Report [Government's Exhibit 16], the results of the analysis identified the crystalline substance as heroin and it weighed 0.01 grams.

3. That on May 24, 2012, as part of a controlled purchase involving the Defendant, SANE officers seized four small white paper folded bindles, purchased as heroin.

4. That on June 19, 2012, Karen S. Brooks, a Forensic Scientist with the Controlled Substances Unit of the Forensic Science Division of the Michigan Department of State Police, conducted a drug screen analysis on one of the four paper packages of crystalline material that was seized as a part of the controlled purchase on May 24, 2012. As reflected in the Laboratory Report [Government's Exhibit 17], the results of the analysis identified the substance as heroin and it weighed 0.04 grams.

5. That on May 24, 2012, as part of a second controlled purchase involving the Defendant that day, SANE officers seized three small white paper folded bindles, purchased as heroin.

6. That on June 19, 2012, Karen S. Brooks, a Forensic Scientist with the Controlled Substances Unit of the Forensic Science Division of the Michigan Department of State Police, conducted a drug screen analysis on one of the three

paper packages of crystalline material that was seized as a part of the second controlled purchase on May 24, 2012. As reflected in the Laboratory Report [Government's Exhibit 18], the results of the analysis identified the substance as heroin and it weighed 0.03 grams.

7. That on June 26, 2012, as part of a controlled purchase involving the co-defendant, Joseph Gideon Gravelle, SANE officers seized a knotted plastic bag containing a light brown powder, purchased as heroin.

8. That on August 29, 2012, John A. Lucey, a Forensic Scientist with the Controlled Substances Unit of the Forensic Science Division of the Department of State Police conducted a drug screen analysis on the package of powder that was seized as a part of the controlled purchase on June 26, 2012. As reflected in the Laboratory Report [Defendant's Exhibit 1], the results of the analysis identified the substance as heroin and it weighed 0.26 grams.

9. That on July 24, 2012, as part of a controlled purchase involving the co-defendant, Joseph Gideon Gravelle, SANE officers seized a small knotted plastic bag containing light brown powder, purchased as heroin.

10. That on August 29, 2012, John A. Lucey, a Forensic Scientist with the Controlled Substances Unit of the Forensic Science Division of the Michigan Department of State Police, conducted a drug screen analysis on the package of powder that was seized as a part of the controlled purchase on July 24, 2012. As

reflected in the Laboratory Report [Defendant's Exhibit 2], the results of the analysis identified the substance as heroin and it weighed 0.17 grams.

Respectfully submitted,

SHARON A. TUREK
Federal Public Defender

/s/ Elizabeth A. LaCosse
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Dated: February 3, 2018

ANDREW BYERLY BIRGE
United States Attorney

Dated: February 3, 2018

/s/ Paul D. Lochner
PAUL D. LOCHNER
Assistant United States Attorney