

BOBBIE DAVIS GRAND JURY TESTIMONY

Transcript from Grand Jury Indictment Investigation of Ronnie Jackson, November 7, 2007.

ASA Langelier: OK. The grand jury has been impaneled. We are here on complaint no. 07-2255. The People of Thompson County, State of Marshall seek a true bill of indictment against Ronnie Jackson for Trafficking in Counterfeit Goods, and Conspiracy to Traffic in Counterfeit Goods. The United States calls Bobbie Davis.

[Witness Investigator Bobbie Davis sworn]

Q. [AUSA Langelier]: You are Investigator Bobbie Davis, Star 2009, currently attached to the Marshall Bureau of Investigation?

A. [Davis]: Yes.

Q. How long have you held this office?

A. For eight years. I joined the Marshall Bureau of Investigation, or MBI, shortly after doing a six month stint with the Marshall National Guard. I am still in the Guard, pay grade E-4. I am putting in for a commission, but in the reserves. I was interested staying on active duty if they would assign me to the military police, but they wanted too much of a commitment, so when I returned from active duty I put in for a job with the Marshall City police. When I graduated from the police academy, I volunteered to work with the joint federal-Marshall task force to intercept drugs and other contraband. Because I have a way with dogs, I was later assigned – five years ago – to the canine unit.

Q. Hold off for a moment. What is your formal education?

A. Oh. I have a Bachelor of Science degree in Criminal Justice, with a minor in psychology. That's from Marshall State University, Thompson County campus. We also have regular training in surveillance and legal issues regarding our work. You know, what's required for a search warrant, and so forth.

Q. What are your duties with the joint task force??

A. Well, normal law enforcement activities. For the past five years, I have been involved in contraband detection and interception, mostly at the airport or at various shipping centers, such as the railway station, commercial small freight forwarding centers, shipping sorting centers, and the like. I act as a team leader in the contraband interception and control task force. Most of what we detect is marijuana and cocaine.

Q. I am showing you what has been marked as Davis Report, August 1, 2007. Do you recognize it?

A. Yes.

Q. Was that report prepared by you and is that your signature at the bottom of that report?

A. Yes.

Q. Are the statements contained in that report true and correct to the best of your knowledge?

A. Yes they are.

Q. You received information from a person by the name of Sam Horton that the counterfeit t-shirts were sent from Las Vegas to Marshall City by a person named Ronnie Jackson?

A. Yes.

Q. Are those the same Sam Horton and Ronnie Jackson who are named in your report?

A. Yes.

Q. Do you have any physical evidence linking Ronnie Jackson to this crime?

A. Yes. Our investigation revealed that a number of text messages to and from Sam's phone came from a telephone registered to Ronnie Jackson; that the shipping charges for the package shipped to Sam were charged to Ronnie Jackson's credit card; and that the note inside the box was printed on a

printer found in Ronnie Jackson's apartment. Also, Ronnie Jackson's fingerprints were found on the mailing label which was affixed to the package.

Q. Did you question Ronnie Jackson concerning this evidence?

A. Yes, but Jackson couldn't give a valid explanation for any of it.

Q. That will be all. Thank you. The witness is excused.

Juror: Just a question. How did you detect t-shirts?

A: Well, that's in the report.

Juror: You got a machine that detects t-shirts?

A: No. The machine detected the presence of marijuana. When we opened the suspect package there was no obvious marijuana, but we found these t-shirts with the name Jamblas on them. I had seen a notice that there was a t-shirt like this that was being manufactured without authority and was hitting the souvenir market.

Juror: How many t-shirts did you find?

A: Ah, that would be two t-shirts. But they are definitely knock-off t-shirts.

Juror: We are here for two t-shirts?

A: Not really. This is the tip of a very big iceberg. There is a warehouse in Las Vegas containing thousands of these t-shirts, and we are working on that as well. We believe that there is a knock-off ring – a conspiracy of larger proportions, if you will – to import a large array of counterfeit merchandise – Gucci purses, Chanel perfumes, Rolex watches, and even inexpensive merchandise such as these Jamblas t-shirts. In certain countries they can manufacture, for example, a Gucci purse that would, if genuine, sell for \$17,000 stateside or in Europe. It costs maybe a couple of hundred dollars to make a very good copy, and it might sell for \$5,000 or even \$500 in the United States or for up to 3,000 Euros in Europe. It's big business, it is a serious problem, and we are trying to rein it in.

Juror: So how did you detect t-shirts?

A: That's in the report. The dog smelled marijuana. If the t-shirts had been exposed to the odor, the chemicals that create the odor, or marijuana or cocoa leaf derivatives, the dog would alert. The dog alerted. Once the box was opened, we saw what we saw. No drugs, no marijuana, but the knock off Jamblas t-shirts.

Langelier: Thank you. You are excused.

Whereupon the witness was excused.