PROFFER STATEMENT OF RONNIE JACKSON
(TRANSCRIBED FROM TAPE)

November 13, 2007

Present: (1) Wil Langelier, Assistant United States Attorney, (2) Marshall Bureau of Investigation Agent Davis, (3) Attorney for Ronnie Jackson, Sara Kahn, (4) Ronnie Jackson, (5) Court reporter Sara Phillips.

Langelier: On the record. We are here for the proffer statement of Ronnie Jackson. This statement is being offered today pursuant to the terms of the proffer letter that has been prepared by the United States Attorney.

Ms. Kahn, you are here representing Ronnie Jackson, right?

Kahn: Yes.

Jackson: That's right.

Langelier: As a courtesy to you, Ms. Kahn, and your client, Ronnie Jackson, we -- Agent Davis and I -- traveled to Las Vegas; we are meeting in your office, Ms. Kahn. With everyone's consent, the statement and attending conversations will be taken down by the Court Reporter and then transcribed. Ronnie, you and your attorney Ms. Kahn will review the transcript of the statement later, and you can sign off on it, if it is correct, so there will be a clear record as to what has been said here today. Ms. Kahn, you have gone over the terms and conditions of the proffer letter with your client?

Kahn: Yes and thank you for your courtesy.

Langelier: Ronnie Jackson, do you understand that what you say in this statement cannot be used against you by the government, unless you should testify at some time in the future contrary to what you are telling us today?

Jackson: Yes.

Langelier: OK, let's start: Do you know a person by the name of Sam Horton?

Jackson: Oh, yeah. I knew Sam from when Sam, you know, lived in Las Vegas. Sam and me were like close friends. We did stuff together, you know?

Langelier: What kind of stuff?

Jackson: Oh, we hung together, you know, in bars and along the strip, and did some serious drinking and, so like some weed, you know, marijuana. Which is how we made the money to live on, you know, by selling weed. So, like, we also make – made -- money by selling knockoffs.

Langelier: By knockoffs, you mean counterfeit goods?

Jackson. Right. See, to tourists mostly. It was low risk, see? We would go to this broker, supplier, and get copies of designer clothing, jewelry, and other stuff, things, to sell maybe outside of some of the big hotels, to mostly tourists. See, we paid maybe a few dollars each for items, put them, in a fancy box, then cruise the Las Vegas Strip, and look for someone who looked like – like, a buyer looking for a bargain. Mostly tourists. You, we, convince the tourist that we need some cash, ready cash, because we just, you know, took a bath, lost everything at the tables, like at poker because everybody understands poker from watching television and playing on-line, right? And so we pretend that we don't know the supposed value of our merchandise, but it looks so real in the expensive box that the people think they are ripping us off when we are selling high-end stuff for a fraction of the store price, which of course we aren't because we paid almost nothing for it. It's really funny, right, how people act when they think they are ripping you off. Hey, you know what Sam used to say? "You can't cheat an honest man."

Langelier: Sam used to say that?

Jackson: Yeah. Sam. Sam says a lot of good stuff like that. So, we are doing pretty good. We have enough cash from the knock-offs and the weed to do just fine until the day I, well, I kind of screwed up when

and me were out doing our thing and I tried to, like, sell a Rolex watch to what I thought was a regular person, but it was not a real Rolex but had the name [spells] R-O-L-L-E-X, so it was not really illegal, see, but this person was actually a cop, you know, like undercover. Sam was a few feet away, like pretending not to know me. So, Sam walks away not to be noticed as the cuffs go on my wrists. That's Sam, smart. I get 18 months in prison and Sam just walks away. I haven't seen or talked to Sam since then though I found out in May, from Reggie, that Sam moved to Marshall City. That was a surprise because I did not, know Sam and Reggie knew each other. So, Reggie told me that he and Sam know each other from, childhood, but they are not real good friends but saw each other a lot while they were in Las Vegas.

Langelier: One moment. Reggie. Who is Reggie?

Jackson: Reggie Jefferson - my roommate. Or I should say, my former roommate. See, Reggie and me had a little conversation about getting back into the knockoff clothing business. I am happy to be out of that life, so, and I tell Reggie I didn't want to go back into that life or that line of business. Reggie starts making fun of me, you know, and says that no leopard can change his spots. You know that saying. So, this happened on June 15, 2007, which happens to be Reggie's birthday and he is saying I am so broke I don't even have money to buy him a birthday drink, which I am not going to do even if it is his birthday or not. On account of his making fun of me, and I haven't seen Reggie since then. I stayed with a friend after work the next day and when I got home on the on the 17th, all of Reggie's stuff was gone. Totally moved out. Reggie left his room totally clean, like nobody had moved in or out. Reggie had a little marijuana stuff going, and that was all gone, even the smell. You couldn't even tell that anyone but me ever lived in that apartment. When I get home from work on the 18th, I'm greeted at my door by some detectives and then I am being questioned about some big scam to sell Jamblas Concert t-shirts in Marshall City. I did not even know there was going to be a concert in Marshall. Like, too bad about the plane crash, but even then I did not know the concert was there. Not my deal.

Officer Davis: Excuse me. I have a question. You say you knew nothing about the contraband t-shirts for the Jamblas concert, or the fact that samples were being shipped. When you were in Las Vegas, did

you know about the garage next door to your apartment, the garage that was used as a warehouse for several thousand Jamblas contraband knock-off t-shirts?

Jackson: That was all news to me. Not my deal. Maybe that was Reggie's deal. Reggie said something about having a really good deal for me, but I said, like I said, I am OK with my life, I do not want any more trouble. No way.

Davis: We were able to retrieve some interesting information: there were a number of telephone calls and text messages to and from your cell phone to Sam Horton. Next, the shipping charges for the package shipped to Sam were charged to your credit card. Next, the mailing label on this same box with the two Jamblas knock-offs was printed on your home computer's printer – the one found in your apartment in Las Vegas. Oh, yes, and your fingerprint was found on the mailing label of this same package. Can you explain any of that? Let's start with the phone and text messages.

Jackson: I have no idea how the calls and text messages were made from my cell phone. I could not find my cell phone, like, from around Memorial Day – the end of May. I was under the weather, you know, a bit too much to drink that weekend, and I might admit having been around a little weed, so I didn't notice it was missing. I could not use it at work, you know, so I was in no hurry to get a new one, and so maybe the phone would, like, turn up. You know what I did? I have this trick, see, to find my cell phone when I can't find it in the apartment. I use the regular phone, the one with the line . . . .

Davis: A land-line phone?

Jackson: Yeah, like that. See, and what I do is I call myself at my cell phone number from that landline phone in my apartment and the cell telephone will ring and that is how I can find it when I left it. I did that, and I did not hear my cell phone ring. So I thought it still could show up because maybe I turned it off at night so I would not be bothered and I did not turn it back on. I was not worried about it. It would show up or I would get another. I was not using it much, and I did not take it with me to work because they are, like, real tight about cell phones at the bank where I work. And maybe I just didn't hear it

ringing. I should get my hearing checked when this is all over. I guess I should have looked more. Where did you find it?

Davis: Don't you remember? You were standing right there when we found it under the cushion of your living room couch

Jackson: When you came to my apartment on June 18th? Right. Stupid. See, I have to admit that I felt kind of stupid that, like, I wondered how I could have missed finding it. I am like that sometimes, I forget where I put stuff but I usually find it. You know?

Davis: The credit card?

Jackson: I don't know how anyone could use my credit card because I keep it, I always kept it in my bedroom drawer. Reggie maybe.

Davis: Reggie. How about the computer printer?

Jackson: My printer, see, it was password protected. You have it. You figured out how to get into it. I guess I can tell you my password. My password was "ronnie."

Davis: Bingo. That took our people about ten seconds to figure out. So, we are left with your fingerprints miraculously showing up on the package containing the contraband t-shirts.

Jackson: I have no idea how they got there. There was a lot of stuff in that apartment before Reggie left. I could have picked up the box, or . . .

Davis: It is a pretty clear print.

Jackson: So, maybe I was eating chicken. I do not know how my print got on the box. I do not know what the box looks like. I do not know what it looks like outside or inside, and I do not know where on the box you found my print. Big deal, you know? We shared an apartment. I am sure you will find Reggie's prints on a lot of my stuff. Did you check my credit card for Reggie's prints?

Langelier: That is a pretty expensive apartment. How do you pay the rent?

Jackson: I don't – I didn't – because Reggie pays, paid, the rent. I get along. I have a job - a real job – I work as a janitor at the Webster National Bank in Las Vegas. That's three years now. I started sometime in July of 2004. It pays twelve dollars and ten cents per hour, plus a free lunch that is no better than the lunch they feel people in a jailhouse, but of course you can buy something better for a discounted price. I got the job at the bank even though I got this fraud conviction. I am straight, mostly, and, well, I don't want to lose this job. Now, I have a question for you.

Langelier: After you first consult with your attorney.

Jackson: O.K. Anything I tell you today can't be used against me?

Langelier: Just what it says in the letter you signed.

Jackson: O.K., here goes. I got free rent, and sort of supplemented my salary by letting Reggie grow marijuana in our apartment. Reggie uses – used – his bedroom and it was full of lights and marijuana plants, and Reggie kept his stuff there but slept on the couch in the front room. So, Reggie paid all the rent. I know this was the wrong thing to do, but I do not have the money – I make $24,000 a year, right? That's the rent on that apartment. But let me tell you. I didn't ship any shirts – I did not ship any shirts real or fake. I went down that road before and jail was no fun.

Davis: But you grew marijuana?

Jackson: Reggie grew it. I never touched it. Maybe I had a joint or two along the way, and maybe I sold a bag or two for some extra walking around money, but I never went into that room.

Davis: Yeah, but you were breaking the law.

Jackson: Gimme a break. You think everything is breaking the law. I did not grow marijuana and I did not ship or even know about any t-shirts.

Langelier: Sam disagrees. So, why would Sam be lying about you?

Jackson: I have no idea why Sam would turn on me and do this, you know, accuse me of something I don't do, didn't do. Maybe it's because I went straight and did OK and Sam is nothing more than a rat. Listen, I'm asking you not to indict me – I didn't do this and I'm being set up, you know, framed. You got to, you know, to see the truth.

Langelier: Any more questions? Nope. O.K. We'll get back to you. Counsel, officer, Ronnie -- Have a good day.

End of interview.

ss/Ronnie Jackson **November 13, 2007**