

SAM HORTON WITNESS STATEMENT

My name is Sam Horton. I am preparing this voluntary statement with the assistance of Investigator Bobbie Davis who is assisting me only as to typing, spelling, and some grammatical changes.

I am a graduate of Marshall City's Henry Wallace High School, and I attended The State of Marshall University, downstate campus, majoring in Speech. I dropped out after my freshman year, having a perfect "D" average. I had trouble getting out of bed to make it to class – Too much partying. Since then, I have lived between Las Vegas and Marshall City. I sell sports equipment, mostly. I have held many odd jobs along the way, including Starbucks and Wal-Mart.

I presently live at 7002 S. Hamilton, in Marshall City, and have lived there for the past 6 years, or so. I first knew of Ronnie Jackson in high school. We were not in the same crowd. I don't think Ronnie belonged to any crowd, and was sort of a loner.

I really met Ronnie Jackson when I lived in Las Vegas, NV. I knew Reggie Jefferson pretty well - Reggie was Ronnie's roommate, and the three of us ran around a bit during that time. I joked about their names being so similar, each having the same initials and each having the last names of former U.S. presidents: I would call them the "live presidents." They didn't think it was funny. Anyway, we drank, smoked some weed, hung out, and generally had a good time.

I was broke, and Ronnie was barely getting by. Reggie seemed to be doing OK, though. For cash we were selling some weed from time to time, and then we started selling brand name and fashion knockoffs - these were look-alike products that closely resembled the real thing, cost a small amount of money to make, and when you sell them for what the mark - the buyer - thinks is a good deal, you make a nice profit. You don't get rich, but you can make a living of sorts. Just stay away from the gambling tables.

Sometime in 2001, I was working the Las Vegas Strip with Ronnie, when Ronnie got busted for selling a knockoff watch for \$800. It looked like a \$10,000 ROLEX watch, but there was

an extra "L" on the logo: "R-O-L-L-E-X." A friend told us that the misspelling meant we were not committing a fraud. He was wrong. When the undercover cop pulled out a badge, I was lucky enough not to be standing too nearby. I was literally inches from getting busted. I was lucky. Ronnie was arrested, but apparently never mentioned my name.

I concluded it was time for me to leave. I left Vegas and moved back home to Marshall City. I was born and raised here. I think Ronnie got probation for that case. Maybe the case was dismissed. I didn't hang around long enough to find out, and I never brought the subject up again.

Except for a couple of holiday cards, I didn't hear from Ronnie until last May. I don't have those holiday cards anymore. I probably looked at them, said "So, Ronnie sent me a card, how nice," and then pitched the card. I don't save holiday cards, birthday cards, letters, or postcards.

The only postcard I ever saved is a card that Ronnie wanted to use for a forgery scam. When I still lived in Vegas, I mentioned to Ronnie that I had a postcard Don Rickles sent my late grandfather, Al DeVito, who was a musician at the old 509 Club in Detroit where Rickles appeared in his early days in show business. When I showed it to Ronnie, Ronnie seemed unimpressed until a week later. Ronnie called and asked to borrow the card in order to copy the signature. I asked Ronnie what for? Ronnie wanted to put it on some souvenirs. Ronnie thought we could sell Rickles' "signed" souvenirs all over Las Vegas, using the signature copied from the postcard to my grandfather. I refused. I drew the line. That was just before Ronnie got busted.

Last May I was in Las Vegas for a quick three day vacation over Memorial Day weekend, and stopped by Reggie's second-floor apartment in a three story upper-class building. I wanted to get caught up on what was going on with Reggie. That's when I found out Ronnie was living with Reggie there. I did not ask about what happened to Ronnie after that arrest a few years ago. Ronnie said nothing, and we just sort of picked up from where we left off.

During that visit, Reggie went into this other room, apparently Reggie's bedroom. Reggie had to remove some tape around the

door, and after he went in I could see inside: there were several marijuana plants growing in a hydration system and under grow lights. This was in Reggie's bedroom, but there was no bed in there. There seemed to be some fancy boxes, and I assumed that Reggie and Ronnie were still in the knock-off business. When Reggie exited the room a while later, he sealed up the door again with duct tape. For the rest of the time the bedroom door was kept shut and air tight, to keep the smell inside the room. I did note that the windows were covered with paper, and closed with tape so that no one could see in and no odors could escape.

We left Ronnie at the apartment and Reggie and I partied for two days and nights. I think we had a great time, but I don't really remember. After those few days I came back to Marshall City. I came back on the following Tuesday morning. Vegas is no longer my kind of town. Before I left I got Ronnie's cell phone number so we could keep in touch, but Ronnie said I should use text only – that conversations could be heard by the wrong people, but that text messages were safe.

All of our communications were by text messages. One of the first messages was that there might be an opportunity in JAMBLAS tee shirts. There was going to be a big JAMBLAS concert in July in Marshall City. I didn't know much about JAMBLAS. I am not involved in that kind of music. But I had heard about it, and was aware that there was going to be a limited edition of the souvenirs from the concert. Ronnie had a source, a t-shirt foreign manufacturer in Peru, who could deliver a warehouse full of these knock-offs. I don't remember exactly what was in each of the messages, but if you show me a copy of them, I'm sure I'll remember.

Even though I almost got busted that time with Ronnie, I thought there was little risk unloading t-shirts. I know some people who buy in wholesale lots, and I have a friend who has a retail outlet, so I figured I would at least take a look at the samples. Maybe I could take on the job as a distributor of t-shirts. After all, the JAMBLAS shirts were not exactly designer clothing.

Of course, we did not know that there was going to be a plane crash and a memorial concert featuring the backup band, "The

Five Pups," and where JAMBLAS t-shirts would become hot collectibles. It was like we fell into a great opportunity.

Ronnie's last text message on June 13th told me I was going to get a sample. I assumed the sample would be of the t-shirts. I might have momentarily thought the sample was going to be marijuana, because sometimes my memory plays tricks on me. My memory hasn't been too good. I think the drugs I did with Reggie on my last trip to Vegas were messing with my mind and my memory. Anyway, I waited for the sample or samples to arrive.

When I opened the package and saw the t-shirts I thought they looked good. Then I read the note from the Marshall Bureau of Investigation that said, "Hi Sam. Gotcha," I wondered what was going on. When the doorbell rang right after, I knew I was in some kind of trouble. I panicked and tried to find a way out of the house. I saw that there was a policeman standing at the back exit, so I went to the front door and tried to play dumb. I didn't realize my hands were covered with a ultra-violet light-sensitive substance that had been put on the note. The arresting officer shone a blue light on my hands, and the phosphorescent powder on my hands and arms lit up.

Actually, my first thought was that Ronnie had also had shipped marijuana to me, and I began to panic. When they accused me of possessing bogus t-, I relaxed. There was no marijuana. I had no idea how serious an operation this particular contraband goods scam was.

Once they got me to MBI headquarters, I discovered how serious this was. Ronnie was the target in a big federal investigation. I had assumed this was a minor deal until the investigators showed me the federal statute and the penalties. They said there were thousands of these t-shirts in a warehouse somewhere, and the total value of those t-shirts could add up to a few years in a federal prison. They told me I was in deep trouble and the only way out was to cooperate and to tell the truth. I told the agents what I knew. I even made a monitored phone call from the police station to Ronnie. No one answered Ronnie's cell phone. I left a message on Ronnie's voice mail. I told Ronnie, "The eagle has landed." I thought that would let Ronnie know that the package with the

merchandise had arrived - that I had received the package. Ronnie did not call me back.

The investigators later told me that they had recovered Ronnie's cell phone after Ronnie had been arrested in Las Vegas. They told me that they also recovered some other evidence. They also told me that they found a warehouse in Las Vegas that was filled with phony JAMBLAS t-shirts. The warehouse was down the street from Ronnie and Reggie's place. The feds said they were going to charge Ronnie with trafficking in counterfeit t-shirts. So far, they cannot prove that Ronnie owned all those t-shirts in the warehouse, and Ronnie won't admit the obvious. Ronnie plays dumb, but is really bright and sneaky. In my opinion Ronnie is a lot smarter than most people think.

What is funny about all this is that the counterfeit t-shirts are now more valuable than the real ones that were handed out at the memorial concert. A collector who found out about all this discovered that there were about a dozen of these high-quality counterfeit t-shirts that were not confiscated. He is paying \$200 and more per t-shirt! That's what I hear. That's the collectible market. Ronnie or somebody apparently released some of these as samples to potential knock-off distributors.

I don't know what will happen to me - all I know is that if I keep cooperating and keep telling the truth, the Assistant United States Attorney and my lawyer will, hopefully, persuade the judge to give me credit for substantially assisting the government in this case. If the government and the judge go easy on me, I hope to get probation rather than a prison sentence.

ss/Sam Horton