UNITED STATES DISTRICT COURT
DISTRICT OF MARSHALL

UNITED STATES OF AMERICA,	)	
Plaintiff	)	No. 07 CR 4624
	)	
v	)	SUPERCEDING
	)	INDICTMENT
	)	
RONNIE JACKSON,	)	
SAM HORTON	)	
Defendants	)	

COUNT ONE

The Special October 2007 Grand Jury charges:

1. Beginning in or around May, 2007 and continuing until on or about June 18, 2007, Marshall City, in the District of Marshall, and elsewhere, Ronnie Jackson and Sam Horton, defendants herein, did conspire with each other, and others known and unknown to the Grand Jury to transport counterfeit goods across state lines in violation of Title 18 USC 2320.

2. It was part of the conspiracy that Ronnie Jackson had possession of a number of counterfeit JAMBLAS tee shirts at or near Jackson's premises in Las Vegas, Nevada.

3. It was further part of the conspiracy that Ronnie Jackson contacted Sam Horton to act as distributor of those counterfeit tee shirts in the Marshall City area.

4. It was further part of the conspiracy that these counterfeit tee shirts would be sold to consumers for an inflated price and be presented as actual JAMBLAS tee shirts.

5. It was further part of the conspiracy that Ronnie Jackson sent a number of counterfeit tee shirts from Las Vegas, Nevada, to Marshall City, Marshall to Sam Horton as a sample for Horton's inspection and approval.

6. It was further part of the conspiracy that the defendants would and did conceal and hide, and cause to be concealed and hidden, the purposes of the acts done in furtherance of the conspiracy, and used cryptic text messages and other means to avoid detection and apprehension by law enforcement authorities.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

The Special October 2007 Grand Jury further charges:

Beginning in or around May, 2007 and continuing until on or about June 18, 2007, at Marshall City, in the District of Marshall, and elsewhere, Ronnie Jackson and Sam Horton, defendants herein, possessed, without legal authority, counterfeit JAMBLAS Tee Shirts, with the intent to traffic said JAMBLAS Tee Shirts.

All in violation of Title 18, United States Code, Section 2320.