

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 2:09-CR-156
v.	*	SECTION: "A"(3)
ADAM JONES	*	VIOLATION: 18 U.S.C. § 1701
	* * *	

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits including the testimony of special agents of the United States Postal Service, Office of Inspector General ("USPS"), inspectors from the Postal Inspection Service, employees of the Gretna Main Post Office and others, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant, **ADAM JONES**.

An employee of the Gretna Main Post Office would testify that, on December 18, 2008, the employee received information that United States mail had been dumped in a particular dumpster. The employee would testify that he went to the particular dumpster and discovered three bundles of direct mail advertising in this dumpster. Pictures and other evidence of this dumped mail would be introduced into evidence to corroborate the employee's testimony. Employees of the Gretna Main

Post Office would testify that the dumped direct mail advertising was assigned to a portion of Route 56055, which had been assigned for delivery to various recipients on December 18, 2008 to the defendant, **ADAM JONES**.

Competent testimony from various agents of the USPS would reflect that, after being informed of the dumping and the investigation against him, **ADAM JONES** was confronted with the evidence. After being read his *Miranda* rights, these agents would testify that **ADAM JONES** confessed to knowingly and wilfully dumping the direct mail advertising in the dumpster on December 18, 2008. Employees from the Gretna Main Post Office and others would testify that the following day, December 19, 2008, **ADAM JONES** resigned his position as a letter carrier for the Gretna Main Post Office. Through the above-noted witnesses, certain documents and exhibits would be offered and introduced into evidence to prove that the defendant's actions of dumping the direct mail advertisements obstructed the passage of this mail.

READ AND APPROVED:

MATTHEW S. CHESTER (Date)
Assistant U.S. Attorney
Texas Bar No. 24045650

GEORGE CHANEY (Date)
Counsel for Adam Jones
La. Bar Roll No. _____

ADAM JONES (Date)
Defendant