

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 16-13
v.	*	SECTION: "J"
JEFFERY HOWARD	*	
	*	
	*	

FACTUAL BASIS

The above-named defendant, JEFFERY HOWARD, has agreed to plead guilty pursuant to a plea agreement with the Government to Count 1 of the Indictment. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, the following facts to support the allegations against the defendant.

On June 19, 2015, FBI New Orleans received information that HOWARD was involved in the trafficking of methamphetamine and is a member of the Aryan Brotherhood. Through investigation, New Orleans FBI established HOWARD was selling methamphetamine. The investigating agents gathered corroborating information and conducted a series of controlled purchases of methamphetamine from HOWARD by a Confidential Human Source (CHS) and an Undercover Law Enforcement Officer (UCE). All controlled purchases of methamphetamine from HOWARD were conducted at HOWARD's residence, located in Nicholson, Mississippi.

In early November, 2015, HOWARD voluntarily stated to the CHS that if CHS needed someone to "Hit a lick on someone, that he was the man for the right price." CHS further clarified to New Orleans FBI, HOWARD meant he would take a payment to commit a murder. After consultation with the United States Attorney's Office, a story was devised and provided to HOWARD stating the UCE's sister had been assaulted and robbed by an African-American drug

dealer (Victim) in Pearl River, Louisiana. HOWARD was asked by the UCE if he would be willing to help the UCE, and repeated HOWARD's earlier offer to the CHS, and HOWARD agreed.

Through a series of recorded meetings between HOWARD, the UCE, and CHS, HOWARD devised a scenario where the CHS would bring the victim to a location called the Pearl River turnaround, just north of the town Pearl River, in Louisiana, and HOWARD would "take him out."

On January 7, 2016, HOWARD rode with the UCE and CHS from his residence in Nicholson, Mississippi, to Pearl River, Louisiana, where he accepted \$2,500 USD as a down payment for the murder. The second payment of \$2,500 USD was to be paid after the murder. While driving to pick up the payment, HOWARD confirmed he intended to kill the victim. HOWARD also told the CHS to pick him up later after dropping off the UCE and he would show the CHS where the murder would happen.

On January 7, 2016, hours after accepting the payment, HOWARD rode with the CHS, from his residence in Nicholson, Mississippi to the proposed murder location, in Louisiana, and provided detailed instructions to the CHS about how HOWARD was going to carry out the murder. After showing the CHS the murder location, HOWARD stated he was going to purchase a cellular telephone solely to communicate with the CHS for the purpose of discussing information about the Murder for Hire scheme. HOWARD and the CHS agreed the murder was to take place during the evening hours of January 14, 2016.

On January 14, 2016, the CHS drove to HOWARD's house in Mississippi and picked him up. They had agreed to further discuss the events to take place later that day. They then

drove to a daiquiri shop in Louisiana near where the murder was to take place. Once they arrived at the daiquiri shop, HOWARD was arrested without incident.

If this case had gone to trial, the government would have proven the foregoing facts by testimony of law enforcement officials, competent witnesses, and production of other evidence. The government would also present additional evidence of guilt not contained above in the factual basis.

GREGORY M. KENNEDY
Assistant United States Attorney

Date

VALERIE WELZ JUSSELIN
Attorney for Jeffery Howard

Date

JEFFERY HOWARD
Defendant

Date