

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

\*

CRIMINAL NO. 18-150

v.

\*

SECTION: "I"

JERRY PEA  
JAMES JACKSON

\*

\* \* \*

FACTUAL BASIS

Should this matter proceed to trial, the United States would prove defendant Jerry PEA guilty beyond a reasonable doubt of conspiracy to distribute, or to possess with the intent to distribute, 28 grams or more of cocaine base and a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C), all in violation of Title 21, United States Code, Section 846 (Count 1). The United States would prove defendant James JACKSON guilty beyond a reasonable doubt of distributing, and aiding and abetting the distribution of, mixtures or substances containing detectable quantities of cocaine base and heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2 (Count 4). Finally, the government would prove PEA (Count 7) and JACKSON (Count 8) guilty beyond a reasonable doubt of possessing a firearm in furtherance of a drug trafficking offense, in violation of Title 18, United States Code, Section 924(c)(1)(A). The government would establish the following through credible testimony and the production of reliable evidence:

JP Defendant JS  
SP Def. Atty. JS  
AUSA JS



From March 2018 through May 2018, a DEA Task Force conducted five controlled buys of heroin and/or crack cocaine from PEA and/or JACKSON using a DEA Confidential Source (CS) and a Hammond Police Department (HPD) undercover police officer (UC).

On March 9, UC and CS, followed by DEA agents, traveled to 47324 Louis Lane in Hammond, Louisiana. Inside, JACKSON sold UC a small quantity of heroin and, at PEA's direction after speaking with him over the phone, sold CS quantities of crack cocaine and heroin.

On March 15, UC and CS, followed by DEA agents, returned to 47324 Louis Lane, where JACKSON and PEA were present inside. UC bought from JACKSON two small baggies of heroin in exchange for \$80. PEA left the residence to retrieve his supply of heroin, and aerial surveillance observed PEA drive to 15656 Becky Lane in Hammond (PEA's stash house), make a quick visit into the residence, and return to 47324 Louis Lane. Upon his return, he sold CS 10 grams of heroin for \$850.

On March 26, UC and CS, followed by DEA agents, returned to 47324 Louis Lane. CS purchased just under five grams of heroin from PEA for \$350 and a half ounce of crack cocaine from JACKSON for \$700. After the transaction, UC informed DEA agents that PEA had a firearm present during the drug transaction, and the video obtained revealed a semi-automatic handgun present and within reach of PEA during the transaction.

On April 12, UC and CS, followed by DEA agents, returned to 47324 Louis Lane. CS purchased two ounces of crack cocaine—one from JACKSON and one from PEA—for \$1,000 per ounce. After the transaction, UC informed DEA agents that JACKSON had a semi-automatic handgun during the drug transaction, and the video obtained revealed a semi-automatic handgun present and within reach of JACKSON during the transaction.


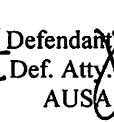

 Defendant  
 Def. Atty.  
AUSA

On May 4, CS traveled to 47324 Louis Lane, followed by DEA agents. No one was home, but both PEA and JACKSON would soon separately arrive. CS paid PEA \$700 for a half ounce of crack cocaine and \$100 for a gram of heroin.

On May 16, DEA agents executed search warrants of the Louis Lane distribution house and PEA's Becky Lane stash house. At the Becky Lane house (home of PEA's girlfriend), agents discovered a handgun and nearly four ounces of heroin.

The government, PEA, and JACKSON agree and stipulate that, for sentencing purposes, the conduct of each defendant, which includes the reasonably foreseeable conduct of the other defendant, involved quantities of heroin and crack cocaine that correspond to greater than 400 kilograms and less than 700 kilograms of marijuana, pursuant to the drug equivalency table in Section 2D1.1 of the United States Sentencing Guidelines.

At trial, the government would introduce, among other evidence: the heroin and crack cocaine purchased from PEA and JACKSON at 47324 Louis Lane between March and May 2018; audio and video recordings of those five purchases of narcotics; credible testimony of the CI and UC regarding their drug transactions with PEA and JACKSON; the firearm and heroin recovered from PEA's Becky Lane stash house; and credible testimony from DEA agents regarding the searches of those properties and the items recovered therein.

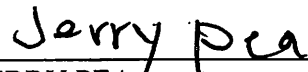
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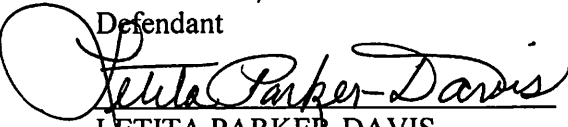
**Limited Nature of Factual Basis**


This proffer of evidence is not intended to constitute a complete statement of all facts known by PEA, JACKSON, or the government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for PEA's plea of guilty to the offenses charged in Counts One and Seven of the Indictment and for JACKSON's plea of guilty to the offenses charged in Counts Four and Eight of the Indictment, and to stipulate that all acts took place within the Eastern District of Louisiana.

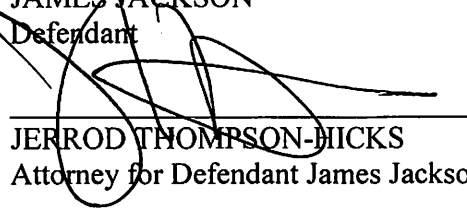
READ AND APPROVED:


  
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JEFFREY SANDMAN  
Assistant United States Attorney

  
\_\_\_\_\_  
JERRY PEA  
Defendant

  
\_\_\_\_\_  
LETITA PARKER-DAVIS  
Attorney for Defendant Jerry Pea

  
\_\_\_\_\_  
JAMES JACKSON  
Defendant

  
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JERROD THOMPSON-HICKS  
Attorney for Defendant James Jackson

  
\_\_\_\_\_  
Defendant  
Def. Atty  
AUSA 