

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO: 13-242

v.

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SECTION: "H"

JASON CROSS

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FACTUAL BASIS

If this case was to proceed to trial the Government would present credible testimony and reliable evidence to prove the following facts beyond a reasonable doubt;

In the fall of 2012, special agents of the Federal Bureau of Investigation ("FBI") learned from law enforcement sources that a New Orleans Police Department ("NOPD") officer who was associated with a known individual from out of state had discussed the possibility of stealing an amount of illegal drugs in order to satisfy outstanding debts the police officer had. In an effort to reduce the potential for violence, FBI agents approached the known individual and obtained his cooperation. In debriefs with the known individual, the known individual confirmed to agents that he and the officer had discussed the possibility of stealing from drug dealers in an effort to generate money. The known individual identified the police officer as Jason Cross ("Cross").

On December 31, 2012, the known individual received a text message from Cross stating he needed \$5,000 by the following Friday. As a result of this text message and reports of Cross'

previously expressing a willingness to rob a drug dealer to generate money, FBI agents had the known individual introduce a scenario to Cross regarding the location of kilogram quantities of cocaine hydrochloride being stored, unattended in a Metairie, Louisiana hotel room that the known individual could access via room key. On January 9, 2013, Cross met with the known individual and discussed the scenario described above. This meeting was recorded via audio and video.

On January 10, 2013, Cross arrived in a vehicle owned by the City of New Orleans and armed with his NOPD issued weapon. Cross met with the known individual, obtained a key to the hotel room and once inside the room, Cross located a bag with approximately three kilograms of fake cocaine hydrochloride wrapped in kilogram amounts. Upon returning to the known individual's vehicle, Cross handed the known individual approximately two kilograms of the fake cocaine hydrochloride, and retained one for himself. As Cross was entering his vehicle he was detained by FBI agents.

After being advised of his Miranda warnings, Cross admitted to agents that he and the known individual had previously discussed the possibility of him stealing from a drug dealer and believed the bag he took from the hotel room contained cocaine hydrochloride. Cross stated to agents that his actions were motivated by debt he had incurred and was seeking money to pay his mortgage which was several months in arrears due to significant debts he had incurred, in part from a family medical situation.

During the course of the events described above, Jason Cross was a New Orleans police officer.

At trial the Government would introduce the fake cocaine hydrochloride, text messages and other evidence of communication involving Cross, recordings made during the course of the investigation as well as the testimony of cooperating witnesses, the investigating agents and the statements of the defendant.

William J. Quinlan, Jr. (date)
Assistant United States Attorney

Robert Jenkins (date)
Attorney for Defendant

Jason Cross (date)
Defendant