

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

UNITED STATES OF AMERICA	*	CRIMINAL NO. 10-080
v.	*	SECTION: "F"
QUINCY L. JYNES	*	
	* * *	

FACTUAL BASIS

If this case were to proceed to trial, the government would prove that the defendant, **QUINCY L. JYNES (JYNES)**, is guilty beyond a reasonable doubt of count two (2) of the Indictment which charges **JYNES** with a violation of the Federal Gun Control Act under Title 18, United States Code, Sections 922 (g)(1) and 924 (a)(2). The government would establish through credible and competent witnesses and evidence the following facts:

On or about May 3, 2009 at approximately 8:10 p.m., New Orleans Police Department (NOPD) 6th District task force officers Daniel Hunter and Chris Lasley were driving a fully marked NOPD vehicle on St. Andrew Street in New Orleans, Louisiana. As Officer Hunter was in the middle of the block near Willow Street, he observed a tan Acura SUV (LA license SJU527) driving the wrong way towards the police car. As the Acura made a right turn on Willow Street, Officer Hunter also observed that it did not have an inspection sticker. Officer Hunter made a left turn on

Willow Street, got behind the Acura and activated the overhead lights and sirens. The Acura drove westbound and crossed Josephine Street before pulling over to the right at the intersection of Jackson Avenue and Willow Street. As the officers got out of their car, they watched as the driver, **JYNES**, climbed over the center console and into the front passenger's seat, switching places with Jermaine Curry. While the two were switching places, Officer Hunter quickly went to the front passenger side of the Acura and observed **JYNES** attempting to place a black handgun behind the lower side panel of the center console. **JYNES** was pulling the panel back with his right hand and placing the gun behind the panel with his left hand.

Officer Hunter yelled "gun" and ordered **JYNES** to place his hands in the air. Officer Hunter took **JYNES** out of the Acura from the passenger side and immediately handcuffed him. Officer Hunter then retrieved a black Glock model 23, .40 caliber pistol, serial number C45196 from the center console. Officer Hunter checked the weapon and found it to contain fifteen (15) live rounds of ammunition with one round in the chamber.

Officer Hunter conducted a background inquiry and determined that **JYNES** pled guilty to possession of crack cocaine in Orleans Parish on February 20, 2008 and that he was on active probation.

After Officer Hunter advised **JYNES** of his *Miranda* rights, he asked **JYNES** why he switched seats in the vehicle and to whom did the car belong. **JYNES** stated that his license was suspended and that "a friend let him use it." **JYNES** could not provide the officers with the name of the owner but a check with the Louisiana Department of Vehicles determined that the Acura was registered to Shaunda Alexander with an address of 2715 Tupelo Street, Kenner, Louisiana.

Certified court records would establish that **JYNES** was convicted on or about February 20, 2008 in the Criminal District Court for the Parish of Orleans, Docket Number 471-794, Section "C"

