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11 Attorneys for United States of America

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION  
15

16 UNITED STATES OF AMERICA, ) NO. CR 14 0196 CRB  
17 Plaintiff, ) PLEA AGREEMENT  
18 v. )  
19 KEITH JACKSON, )  
20 Defendant. )

21  
22 I, Keith Jackson, and the United States Attorney’s Office for the Northern District of California  
23 (hereafter “the government”) enter into this written plea agreement (the “Agreement”) pursuant to Rule  
24 11(c)(1)(A) and 11(c)(1)(B) of the Federal Rules of Criminal Procedure:

25 **The Defendant’s Promises**

26 1. I agree to plead guilty to Count Two of the captioned Second Superseding Indictment

27  
28 PLEA AGREEMENT  
CR 14 0196 CRB

1 charging me with conspiracy to conduct and participate in the affairs of an enterprise through a pattern  
 2 of racketeering activity, in violation of 18 U.S.C. § 1962(d). I agree that the elements of the offense are  
 3 as follows: (1) I knowingly and intentionally agreed with another person to participate in the conduct of  
 4 the affairs of an enterprise through a pattern of racketeering activity and that a conspirator committed or  
 5 would commit at least two acts of racketeering in the conduct of the affairs of the enterprise; (2) the  
 6 racketeering enterprise was established; (3) I was associated with the enterprise; and (4) the  
 7 racketeering enterprise or its activities affected or would affect interstate commerce.

8 I agree that the maximum penalties for a violation of 18 U.S.C. § 1962(d) are as follows:

- |    |    |   |  |
|----|----|---|--|
| 9  | a. | Maximum prison term:                    | 20 years   |
| 10 | b. | Maximum fine:                           | \$250,000 or twice the gross gain<br>or loss, whichever is greater |
| 11 |    |   |  |
| 12 | c. | Maximum supervised release term         | 3 years  |
| 13 | d. | Restitution to any identifiable victims |  |
| 14 | e. | Mandatory special assessment            | \$100  |
| 15 | f. | Potential Deportation                   |  |
| 16 | g. | Forfeiture                              |  |

17 I acknowledge that pleading guilty may have consequences with respect to my immigration  
 18 status if I am not a citizen of the United States. Under federal law, a broad range of crimes are  
 19 removable offenses, including the offense to which I am pleading guilty. Removal and other  
 20 immigration consequences are the subject of a separate proceeding, however, and I understand that no  
 21 one, including my attorney or the district court, can predict to a certainty the effect of this conviction on  
 22 my immigration status. I nevertheless affirm that I want to plead guilty regardless of any immigration  
 23 consequences that may result from my guilty plea, even if the consequence is my automatic removal  
 24 from the United States.

25 2. I agree that I am guilty of the offense to which I am pleading guilty, and I agree that the  
 26 following facts are true:

27 From 2011 through at least March 2014, an enterprise, hereafter referred to as "the Campaign,"  
 28

1 existed that consisted of the Leland Yee for Mayor 2011 campaign and the Leland Yee for Secretary of  
2 State 2014 campaign. The Campaign was formed to finance and support the campaign of Leland Yee  
3 for the position of mayor of San Francisco in the election to be held in November 2011, and the  
4 campaign of Leland Yee for the position of California Secretary of State in the election to be held in  
5 2014. The Campaign had common employees, consultants, contributors, and structure. The  
6 Campaign's members and associates operated in the City and County of San Francisco, in the City of  
7 Sacramento, throughout the state of California, and elsewhere, and its activities affected other parts of  
8 the United States outside California. The Campaign and its members and associates engaged in legal  
9 fundraising and campaign activities, as well as raising money through illegal activities.

10 Since at least 2011 and continuing through at least March 26, 2014, I was a member of and  
11 associated with the Campaign. I acted as a consultant to and fundraiser for the Campaign. I associated  
12 with members and other individuals associated with the Campaign, including Leland Yee, who was at  
13 that time a California State Senator. I participated in legal fundraising and campaign activities on behalf  
14 of the Campaign. I also agreed with Leland Yee to conduct and participate in the conduct of the affairs  
15 of the Campaign through a pattern of racketeering activity. I agree that Leland Yee and I committed at  
16 least two acts of racketeering in the conduct of the affairs of the Campaign.

17 In furtherance of my association with the Campaign members, including Leland Yee, and the  
18 conspiracy to conduct and participate in the affairs of an enterprise through a pattern of racketeering  
19 activity, I engaged in the following overt acts:

- 20 • On or about September 26, 2012, while I was located in the Northern District of  
21 California, I spoke over the telephone with an individual located in Georgia who I later  
22 learned was an undercover employee of the Federal Bureau of Investigation, UCE 4773,  
23 about a letter and telephone call that Leland Yee and I agreed that Leland Yee would  
24 provide to UCE 4773, in Leland Yee's capacity as State Senator, for the benefit of UCE  
25 4773's purported client, in exchange for \$10,000 to retire Leland Yee's debt from the San  
26 Francisco mayoral campaign. This constituted honest services wire fraud in violation of  
27 Title 18, United States Code, Sections 1343 and 1346.

- 1 • On or about November 19, 2012, I accepted the \$10,000 in cash described above on  
2 behalf of UCE 4773 in exchange for an interstate telephone call made by Leland Yee  
3 from the Northern District of California with UCE 4773, who was located in Georgia,  
4 and another FBI undercover employee, UCE 4138, who was located in Hawaii, and for a  
5 letter written by Leland Yee – both of which were done by Leland Yee in his capacity as  
6 State Senator for the benefit of the business interests of UCE 4773's client. This  
7 constituted honest services wire fraud in violation of Title 18, United States Code,  
8 Sections 1343 and 1346.
- 9 • On or about March 2, 2013, I had a telephone conversation with Leland Yee during  
10 which we agreed to a conspiracy and plan to extort and obtain money and campaign  
11 donations from an individual who had an interest in pending legislation involving the  
12 California State Athletic Commission by leading that individual to believe that Leland  
13 Yee would vote against the legislation unless campaign support was forthcoming from  
14 that individual and others who had an interest in the passage of the legislation. This  
15 constituted conspiracy to obtain property under color of official right in violation of Title  
16 18, United States Code, Section 1951(a).
- 17 • On or about May 6, 2013, I accepted a check for \$5,000 made payable to "Leland Yee for  
18 Secretary of State" from an FBI undercover employee, UCE 4599, knowing that it was in  
19 exchange for Leland Yee providing a certificate on California State Senate letterhead  
20 honoring the Chee Kung Tong. This constituted honest services wire fraud conspiracy in  
21 violation of Title 18, United States Code, Sections 1343, 1346, and 1349.
- 22 • On or about June 22, 2013, I received \$11,000 in cash as a bribe from another FBI  
23 undercover employee, UCE 4180, knowing that it was in exchange for a meeting  
24 arranged by Leland Yee, in his capacity as State Senator, with another State Senator so  
25 that UCE 4180 could discuss his purported interest in statewide marijuana legislation.  
26 This constituted honest services wire fraud conspiracy in violation of Title 18, United  
27 States Code, Sections 1343, 1346, and 1349. On the same date, I had a conversation with  
28

1 UCE 4180 during which I told him that Leland Yee would accept a payment of \$60,000  
2 in exchange for Yee's vote on pending legislation regarding workers compensation for  
3 professional athletes. This constituted conspiracy to obtain property under color of  
4 official right in violation of Title 18, United States Code, Section 1951(a).

- 5 • On or about March 11, 2014, I met with Leland Yee, Wilson Lim, and UCE 4599 and  
6 discussed UCE 4599 purchasing weapons from the Philippines to import into the United  
7 States. Leland Yee and I had arranged the meeting with the intention that UCE 4599  
8 would be able to utilize introductions and arrangements from me, Leland Yee, and  
9 Wilson Lim to purchase quantities of weapons, firearms, and arms from other individuals  
10 in the Philippines. UCE 4599 advised us that he wanted automatic weapons and  
11 discussed with us that he wanted the weapons transported from the Philippines to the Port  
12 of Newark, New Jersey. This constituted a conspiracy to knowingly import and bring  
13 into the United States any firearm and ammunition in violation of Title 18, United States  
14 Code, Sections 371 and 922(l).
- 15 • On or about March 17, 2014, I reimbursed an individual with \$3,000 in cash in exchange  
16 for two checks made payable to the Leland Yee for Secretary of State campaign. I did so  
17 knowing that the cash was money paid by UCE 4599 in furtherance of a weapons  
18 trafficking deal with Leland Yee, Wilson Lim, me, and others. This constituted money  
19 laundering in violation of Title 18, United States Code, Section 1956.

20 3. I agree to give up all rights that I would have if I chose to proceed to trial, including the  
21 rights to a jury trial with the assistance of any attorney; to confront and cross-examine government  
22 witnesses; to remain silent or testify; to move to suppress evidence or raise any other Fourth or Fifth  
23 Amendment claims; to any further discovery from the government; and to pursue any affirmative  
24 defenses and present evidence.

25 4. I agree to give up my right to appeal my conviction, the judgment, and orders of the  
26 Court. I also agree to waive any right I have to appeal any aspect of my sentence, including any orders  
27 relating to forfeiture and or restitution. I also agree to give up any right I may have to appeal my  
28

1 sentence, except that I reserve my right to appeal an upward departure from the Guideline imprisonment  
2 range determined by the Court.

3 5. I agree not to file any collateral attack on my conviction or sentence, including a petition  
4 under 28 U.S.C. § 2255 or 28 U.S.C. § 2241, except that I reserve my right to claim that my counsel was  
5 ineffective in connection with the negotiation of this Agreement or the entry of my guilty plea. I also  
6 agree not to seek relief under 18 U.S.C. §3582.

7 6. I agree not to ask the Court to withdraw my guilty plea at any time after it is entered. I  
8 understand that by entering into this Agreement: (a) I agree that the facts set forth in Paragraph 2 of this  
9 Agreement shall be admissible against me under Fed. R. Evid. 801(d)(2)(A) in any subsequent  
10 proceeding, including at trial, in the event I violate any of the terms of this Agreement, and (b) I  
11 expressly waive any and all rights under Fed. R. Crim. 11(f) and Fed. R. Evid. 410 with regard to the  
12 facts set forth in Paragraph 2 of this Agreement in such subsequent proceeding. I understand that the  
13 government will not preserve any physical evidence obtained in this case.

14 7. I agree that the Court will use the Sentencing Guidelines to calculate my sentence. I  
15 understand that the Court must consult the Guidelines and take them into account when sentencing,  
16 together with the factors set forth in 18 U.S.C. § 3553(a). I also understand that the Court is not bound  
17 by the Guidelines calculations submitted by my counsel, the government, or the United States Probation  
18 Office or by any agreements herein regarding the calculation of the Guidelines. I understand that the  
19 Court may conclude that a higher Guidelines range applies to me, and, if it does, I will not be entitled,  
20 nor will I ask to withdraw my guilty plea. I agree that regardless of the sentence that the Court imposes  
21 on me, I will not be entitled, nor will I ask, to withdraw my guilty plea. The United States and I have  
22 reached no agreement as to my Criminal History Category or the applicable sentencing guidelines  
23 calculations in this matter, with the exceptions as follows:

24 (a) the enhancement pursuant to U.S.S.G. § 2K2.1(b)(3)(A) relating to the allegations regarding  
25 a violation of 18 U.S.C. § 2332g does not apply in the instant case,

26 (b) the enhancement pursuant to U.S.S.G. § 3B1.1 does not apply in the instant case; and

27 (c) if I meet the requirements of U.S.S.G. § 3E1.1, I may be entitled to a three level reduction for  
28

1 acceptance of responsibility, provided that I forthrightly admit my guilt, cooperate with the Court and  
2 the Probation Office in any presentence investigation ordered by the Court, and continue to manifest an  
3 acceptance of responsibility through and including the time of sentencing.

4 As part of this agreement, the government and I agree that (1) I may argue for a sentencing  
5 variance pursuant to 18 U.S.C. § 3553(a), if applicable, (2) I will not recommend a sentence lower than  
6 72 months imprisonment, and (3) the government will not recommend a sentence higher than 120  
7 months, followed by 3 years of supervised release, and a \$100 special assessment; the government also  
8 agrees not to recommend a fine unless it is determined that the defendant has the financial resources to  
9 pay a fine.

10 I agree and understand that this agreement and any plea of guilty I might enter pursuant to this  
11 plea agreement are contingent upon the entry of guilty pleas by my co-defendants, Brandon Jackson and  
12 Marlon Sullivan, in this case. I agree and understand that if either of those co-defendants fails to enter a  
13 guilty plea, this agreement and any proceedings pursuant to this agreement shall be withdrawn or  
14 voided.

15 8. I agree that regardless of any other provision of this Agreement, the government may and  
16 will provide the Court and the Probation Office with all information relevant to the offense of conviction  
17 and the sentencing decision. I agree that, based on the nature of the offense, the Court should impose  
18 the following special condition of supervised release which is reasonably related to deterrence and  
19 rehabilitation:

20 Special Condition (Searches)

21 The defendant shall submit his person, residence, office, vehicle, or any  
22 property under his control to a search. Such a search shall be conducted by a  
23 United States Probation Officer or any federal, state, or local law enforcement  
24 officer at any time with or without suspicion. Failure to submit to such a search  
may be grounds for revocation; the defendant shall warn any residents that the  
premises may be subject to searches.

25 9. I agree that any fine, forfeiture, or restitution imposed by the Court against me will be  
26 immediately due and payable and subject to immediate collection by the government and I understand  
27 that the government may seek immediate collection of the entire fine, forfeiture, or restitution from any  
28

1 assets without regard to any schedule of payments imposed by the Court or established by the Probation  
 2 Office. I agree that I will make a good-faith effort to pay any fine, forfeiture, or restitution I am ordered  
 3 to pay. Before or after sentencing, I will upon request of the Court, the government, or the Probation  
 4 Office, provide accurate and complete financial information, submit sworn statements and give  
 5 depositions under oath concerning my assets and my ability to pay, surrender assets I obtained as a result  
 6 of my crimes, and release funds and property under my control in order to pay any fine, forfeiture, or  
 7 restitution. I agree to pay the special assessment at the time of sentencing. At this time, the government  
 8 has not identified any restitution amount that would be owed to any victim by Mr. Jackson.

9 10. I agree not to commit or attempt to commit any crimes before sentence is imposed or  
 10 before I surrender to serve my sentence. I also agree not to violate the terms of my pretrial release; not  
 11 to intentionally provide false information to the Court, the Probation Office, Pretrial Services, or the  
 12 government; and not to fail to comply with any of the other promises I have made in this Agreement. I  
 13 agree that if I fail to comply with any promises I have made in this Agreement, then the government will  
 14 be released from all of its promises in this Agreement, including those set forth in the Government's  
 15 Promises Section below, but I will not be released from my guilty plea.

16 11. I do not oppose the forfeiture of the following property (hereinafter "Subject Property"):

- 17 (1) One 5.56 caliber AR-15 rifle with no serial number or manufacturer markings on lower  
 18 receiver;  
 19 (2) One 5.56 caliber AR-15 rifle with no serial number or manufacturer markings on lower  
 20 receiver, barrel marked "5.56 NATO 1/7 CL Palmetto", "Palmetto" marked on upper receiver and stock;  
 21 (3) One .44 caliber Smith and Wesson Revolver, serial number 173514 XRF# 94590;  
 22 (4) One .45 caliber Sturm Ruger handgun, serial number 661-43176;  
 23 (5) One .45 caliber Taurus revolver, serial number CW930492;  
 24 (6) One 9MM Calico firearm, serial number J000690;  
 25 (7) One AK-47 assault rifle, serial number 1983 AE4488;  
 26 (8) One 9MM Luger pistol, serial number D047677;  
 27 (9) One .233 caliber Bushmaster firearm, serial number CRB003689;  
 28 (10) One .45 caliber Springfield pistol, serial number N450080;  
 (11) One 9MM Luger pistol, serial number 17094;  
 (12) One AR-15 assault rifle with attached bipod, no serial number or manufacturing stamp;  
 (13) One 7.62 caliber SKS rifle, serial number 24023048N;  
 (14) One 7.62 caliber Norinco firearm, serial number 8808322;  
 (15) One 9MM Uzi semi-automatic firearm, serial number SA41977;  
 (16) One 9MM M-11 S.M.D. firearm, serial number 89-0007062;  
 (17) One .22 caliber Ruger carbine, serial number 123-20766;  
 (18) One Cobray pistol, with last six digits of serial number 007394;  
 (19) One 12-gauge Mossberg shotgun, serial number MV60079C;  
 (20) One .223 caliber Sturm Ruger rifle, serial number 580-75655;  
 (21) One Smith and Wesson handgun, serial number A170243;



- 1 (22) One Colt handgun, serial number SFA5458;  
 2 (23) One 7.62 caliber Clayco Sports rifle, serial number 105211;  
 3 (24) One 7.62 caliber SKS firearm, serial number 2697;  
 4 (25) One 7.62 caliber AK-47 rifle, serial number CM0605639;  
 5 (26) One .380 caliber Cobra M12;  
 6 (27) One .22LR caliber Smith and Wesson firearm, serial number DZR2321;  
 7 (28) One .45 caliber Ruger revolver, serial number 45-12226;  
 8 (29) One .357 caliber Smith and Wesson revolver, serial number AYL5133;  
 9 (30) One .22 caliber revolver, serial number 69874;  
 10 (31) One .223 caliber Daewoo DR-200 rifle bearing serial number RA001216;  
 11 (32) One .40 caliber Ruger SR40 handgun, serial number 342-08483;  
 12 (33) One .380 caliber Cobra FS380 semi-automatic pistol;  
 13 (34) One .223 caliber Aero Precision X15 rifle with an obliterated serial number;  
 14 (35) One Beretta Model 92FS, serial number BER252848Z  
 15 (36) Approximately 496 rounds of ammunition of various caliber including shotgun shells;  
 16 (37) Approximately Twenty (20) magazines including "extended" and drum-style magazines for  
 17 ammunition of various calibers;  
 18 (38) One speed loader;  
 19 (39) One blue ballistic vest with yellow marking "FBI" manufactured by Point Blank, model  
 20 Gold Flex-6 IIIA, Style VNG052;  
 21 (40) One white ballistic vest manufactured by ABA, model XT3A-2;  
 22 (41) One bullet-proof vest manufactured by International Armor, Model Type 2A;  
 23 (42) One AK-47 scope;  
 24 (43) One silencer;  
 25 (44) Real property and improvements located at 5555 Merritt Drive, Concord, Ca.;
- 14 Dollars, and 380 Hong Kong Dollars seized from 3430 Laguna Avenue, Apt. C, Oakland, CA on March  
 26, 2014;
- 15 (46) \$228,420.00 seized from 133-43 37th Ave., Flushing, NY on March 25, 2014;  
 16 (47) \$66,066.00 seized from 1370 24th Ave., San Francisco, CA on March 26, 2014;  
 17 (48) \$98,791.00 seized from 999 87th St., Daly City, CA on March 26, 2014;  
 18 (49) Equipment that facilitated the cultivation and distribution of marijuana seized at 5804  
 Highland Avenue, Richmond, CA on February 20, 2014;  
 19 (50) Equipment that facilitated the cultivation and distribution of marijuana seized at 5176  
 Judsonville Avenue, Antioch, CA on October 30, 2012;  
 20 (51) Electrical equipment, such as plant grow light bulbs, hoods, and electrical ballasts, seized  
 21 from 555 Merritt Dr., Concord, CA on February 20, 2014;  
 22 (52) \$26,786.00 seized from 225 Jules Ave., San Francisco, CA on March 26, 2014;  
 23 (53) \$15,142.00 seized from 1116 St. Francis Dr., Concord, CA on March 26, 2014;  
 24 (54) \$8,006.00 seized from 991 Carolina St., San Francisco, CA on March 26, 2014;  
 25 (55) \$5,644.00 seized from 558 Broadway St., Apt. 8, San Francisco, CA on March 26, 2014;  
 26 (56) \$3,452.00 seized from 353 King St., Apt. 720, San Francisco, CA on March 26, 2014;  
 27 (57) \$2,717.00 seized from 128 Buxton Ave., South San Francisco, CA on March 26, 2014;  
 28 (58) \$1,698.00 seized from James Pau at 133-43 37th Ave., Flushing, NY on March 25, 2014;  
 (59) \$1,076.00 seized from Leslie Yun at 133-43 37th Ave., Flushing, NY on March 25, 2014;  
 (60) \$8,507.32 seized from 6386 Blackwood Dr., Cupertino, CA on March 26, 2014; and  
 (61) \$27,400.00 in U.S. Currency, seized on February 18, 2015, from bank account number  
 X2825 held in the name of Leland Yee for Secretary of State 2014, at Wells Fargo Bank, San Francisco,  
 California.

26 The parties agree that forfeiture from Mr. Jackson in the instant case shall be limited to the  
 27 Subject Property. I relinquish any and all right, title, and interest I may have in the Subject Property and  
 28

1 agree that such right, title, and interest can be forfeited to the United States without further notice to me.  
2 I also agree I will not contest any administrative or judicial forfeiture proceeding (whether criminal,  
3 civil, state or federal) which may be brought against said property. I further agree to waive all  
4 constitutional and statutory challenges in any manner (including direct appeal, habeas corpus, or any  
5 other means) to any forfeiture carried out in accordance with this Agreement on any ground, including  
6 that the forfeiture constitutes an excessive fine or punishment or that the forfeiture proceeding was  
7 brought in violation of any statute of limitations.

8 12. I agree that this Agreement contains all of the promises and agreements between the  
9 government and me, and I will not claim otherwise in the future. No modification of this Agreement  
10 shall be effective unless it is in writing and signed by all parties.

11 13. I agree that the Agreement binds the U.S. Attorney's Office for the Northern District of  
12 California only, and does not bind any other federal, state, or local agency.

13 **The Government's Promises**

14 14. The government agrees to move to dismiss any open charges pending against the  
15 defendant in the captioned Second Superseding Indictment at the time of sentencing.

16 15. The government agrees not to file any additional charges against the defendant that could  
17 be filed as a result of the investigation that led to the captioned Second Superseding Indictment.

18 16. The government agrees to recommend a sentence of no more than 120 months  
19 imprisonment, followed by a period of 3 years of supervised release, and a \$100 special assessment.  
20 The government agrees not to recommend a fine unless it is determined that the defendant has the  
21 financial resources to pay a fine.

22 17. The government agrees not to seek Mr. Jackson's testimony and not to call him as a  
23 witness in any proceeding related to this action.

24 **The Defendant's Affirmations**

25 18. I confirm that I have had adequate time to discuss this case, the evidence, and the  
26 Agreement with my attorney and that my attorney has provided me with all the legal advice that I  
27 requested.

1 19. I confirm that the while I considered signing this Agreement, and at the time I signed it, I  
2 was not under the influence of any alcohol, drug, or medicine that would impair my ability to understand  
3 the Agreement.

4 20. I confirm that my decision to enter a guilty plea is made knowing the charges that have  
5 been brought against me, any possible defense, and the benefits and possible detriments of proceeding to  
6 trial. I also confirm that my decision to plead guilty is made voluntarily, and no one coerced or  
7 threatened me to enter into this Agreement.

8  
9 Dated: 7-1-2015

  
\_\_\_\_\_  
KEITH JACKSON  
Defendant

11 MELINDA HAAG  
12 United States Attorney

13 Dated: July 1, 2015

  
\_\_\_\_\_  
WILLIAM FRENTZEN  
SUSAN E. BADGER  
S. WAQAR HASIB  
Assistant United States Attorneys

17 21. I have fully explained to my client all the rights that a criminal defendant has and all the  
18 terms of this Agreement. In my opinion, my client understands all the terms of this Agreement and all  
19 the rights my client is giving up by pleading guilty, and, based on the information now known to me, my  
20 client's decision to plead guilty is knowing and voluntary.

21  
22 Dated: \_\_\_\_\_

  
\_\_\_\_\_  
JAMES J. BROSNAHAN  
S. RAJ CHATTERJEE  
Attorneys for Defendant Keith JACKSON