

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Cause No. 1:18-cr-0116 JRS-MJD
PERRY JONES,	)	-09
	)	
Defendant.	)	

UNITED STATES' FACTUAL BASIS

The United States of America, by counsel, Josh J. Minkler, United States Attorney for the Southern District of Indiana, and Michelle P. Brady, Assistant United States Attorney, sets forth the following facts, which it would be prepared to prove if this matter went to trial.

Count One

In late 2017, the DEA began investigating several individuals in Kokomo, Indiana for suspected drug trafficking activities. In the course of the investigation, the DEA obtained court authorization to intercept multiple cellular phones in 2018, including three cellular phones belonging to codefendant Reggie BALENTINE. Through investigation, the DEA learned that Pierre RILEY was obtaining kilogram quantities of methamphetamine in Georgia, which he then distributed to Reggie BALENTINE. This distribution was facilitated by female couriers, who were directed by RILEY and BALENTINE to travel down to Georgia to pick up the methamphetamine (and, on occasion, cocaine), and bring those controlled substances back to Kokomo, Indiana. Upon arriving in Kokomo, the controlled substances would be distributed by

Reggie BALENTINE to other individuals, including Michael O'BANNON, Shaun MYERS, Michael JONES, and others. Perry JONES routinely assisted Reggie BALENTINE in these distribution activities, picking up drug proceeds and delivering drugs as directed by Reggie BALENTINE.

Before PERRY JONES, defendant herein, committed the offenses charged in Count One, PERRY JONES had sustained a final conviction for a serious drug felony, namely, a conviction for Dealing in Cocaine within 1000 Feet of School Property, a Class A felony, Howard County, Indiana, Cause Number 34C01-9311-CF-00078, for which he served more than 12 months of imprisonment, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offenses charged in Count One.

Count Seven

On March 8, 2018, BALENTINE and Jason REED spoke at BALENTINE's residence. At that time, BALENTINE agreed to give two firearms to REED. BALENTINE then immediately called Perry JONES, and asked P.JONES to bring the two required firearms from 312 S. Calumet in Kokomo over to BALENTINE and P.JONES' shared residence, 720 S. Courtland, Kokomo. P.JONES did so on March 8, 2018, and the two firearms stayed at BALENTINE and P.JONES' shared Courtland residence in BALENTINE's possession until March 11, 2018, when REED came to that location and obtained the two firearms. Both firearms, described in Counts Seven through Nine of the Fifth Superseding Indictment, were manufactured outside the State of Indiana. As he knew in March 2018, Perry JONES had previously been convicted of a felony offense prior to 2018.

Count Seventeen

On May 1, 2018, Perry JONES possessed the firearm that is described in Count Seventeen of the Fifth Superseding Indictment. This firearm was manufactured outside of the State of Indiana. As Perry JONES knew on May 1, 2018, he had previously been convicted of a felony offense, prior to 2018.

Respectfully submitted,

JOSH J. MINKLER
United States Attorney

By: /s/ Michelle P. Brady
Michelle P. Brady
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/ Michelle P. Brady
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