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United States Attorney
Eastern District of Washington
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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
JUN 11 2020
SEAN F. McAVOY, CLERK
DEPUTY
RICHLAND, WASHINGTON

SEALED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

MORRIS BRUCE JACKSON,

Defendant.

1:19-CR-2039-SMJ

Plea Agreement

FILED UNDER SEAL

Plaintiff United States of America, by and through William D. Hyslop,
United States Attorney, and Thomas J. Hanlon and Richard C. Burson, Assistant
United States Attorneys, for the Eastern District of Washington, and the
Defendant, Morris Bruce Jackson, and the Defendant's counsel, Ken Therrien,
agree to the following Plea Agreement:

1 **1. Guilty Plea and Maximum Statutory Penalties:**

2 The Defendant agrees to enter a plea of guilty to the Indictment filed on July
3
4 17, 2019, charging the Defendant with Felon in Possession of a Firearm, in
5 violation of 18 U.S.C. §922(g)(1) and §924(a)(2).

6 The Defendant understands that the maximum statutory penalty for Felon in
7
8 Possession of a Firearm, in violation of 18 U.S.C. §922(g)(1) and §924(a)(2) is a
9 term of imprisonment of ten (10) years; a fine not to exceed \$250,000; a term of
10 supervised release of three (3) years; and a \$100 special penalty assessment.

11
12 **2. Video Proceedings:**

13 Pursuant to this Court's General Order 20-101-3 (eff. March 30, 2020) and
14
15 Section 15002(b) of the CARES Act, Pub. L. No. 116-136 (H.R. 748)(eff. March
16 27, 2020), the Defendant agrees to the use of video conferencing (or telephone
17 conferencing if video conferencing is not reasonably available) for any eligible
18
19 hearings listed in Section 15002(b) of the CARES Act, specifically detention
20 hearings, initial appearances, preliminary hearings, waivers of indictment,
21
22 arraignments, supervised release revocation proceedings, pretrial release
23 revocation proceedings, and felony pleas and sentencings.

24
25 **3. The Court is Not a Party to This Plea Agreement:**

26 The Court is not a party to this Plea Agreement and may accept or reject this
27
28 Plea Agreement. Sentencing is a matter that is solely within the discretion of the

1 Court. The Defendant understands that the Court is under no obligation to accept
2 any recommendations made by the United States and/or by the Defendant; that the
3 Court will obtain an independent report and sentencing recommendation from the
4 U.S. Probation Office; and that the Court may, in its discretion, impose any
5 sentence it deems appropriate up to the statutory maximums stated in this Plea
6 Agreement.
7

8
9 The Defendant acknowledges that no promises of any type have been made
10 to the Defendant with respect to the sentence the Court will impose in this matter.
11

12 The Defendant understands that the Court is required to consider the advisory
13 sentencing guideline range, but may depart upward or downward under the
14 appropriate circumstances.
15

16 The Defendant also understands that should the sentencing judge decide not
17 to accept any of the parties' recommendations, that decision is not a basis for
18 withdrawing from this Plea Agreement or a basis for withdrawing this plea of
19 guilty.
20

21
22 **4. Waiver of Constitutional Rights:**

23 The Defendant understands that by entering this plea of guilty the Defendant
24 is knowingly and voluntarily waiving certain constitutional rights, including:
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- 26 (a) The right to a jury trial;
27 (b) The right to see, hear and question the witnesses;
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- (c) The right to remain silent at trial;
- (d) The right to testify at trial; and
- (e) The right to compel witnesses to testify.

While the Defendant is waiving certain constitutional rights, the Defendant understands that he retains the right to be assisted through the sentencing and any direct appeal of the conviction and sentence by an attorney, who will be appointed at no cost if the Defendant cannot afford to hire an attorney. The Defendant also acknowledges that any pretrial motions currently pending before the Court are waived.

5. Elements of the Offense:

The United States and the Defendant agree that in order to convict the Defendant of Felon in Possession of Firearm, in violation of 18 U.S.C. § 922(g)(1), 924(a)(2), as charged in the Indictment, the United States must prove beyond a reasonable doubt the following elements:

First, on or about June 8, 2019, within the Eastern District of Washington, the Defendant knowingly possessed a firearm, to wit: a Ruger, model 10/22, caliber .22 LR rifle, bearing serial number 259-85399;

Second, the firearm had been transported from one state to another; and

Third, at the time the defendant possessed the above firearm, the Defendant had been convicted of a crime punishable by imprisonment for a term exceeding

1 one year, and the Defendant knew of his status as a person previously convicted of
2 a crime punishable by imprisonment for a term exceeding one year.

3
4 *9th Cir. Model Instruction 8.65 (2019)(modified)*

5 **6. Factual Basis and Statement of Facts:**

6 The United States and the Defendant stipulate and agree that the following
7 facts are accurate; that the United States could prove these facts beyond a
8 reasonable doubt at trial; and that these facts constitute an adequate factual basis
9 for Defendant's guilty plea. This statement of facts does not preclude either party
10 from presenting and arguing, for sentencing purposes, additional facts which are
11 relevant to the guideline computation or sentencing, unless otherwise prohibited in
12 this agreement.
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16 On June 8, 2019, the Defendant, Natasha Jackson (hereinafter "Natasha"),
17 James Dean Cloud (hereinafter "James"), and Donovan Quinn Carter Cloud
18 (hereinafter "Donovan") were traveling in a vehicle within the external boundaries
19 of the Yakama Nation Indian Reservation. The Defendant believed that James and
20 Donovan were going to transport Natasha to Lyle, Washington. At that time,
21 Natasha's boyfriend resided in Lyle, Washington. The Defendant and Natasha
22 were seated in the rear of the vehicle. Donovan was driving the vehicle. James
23 was seated in the front passenger seat. While in the vehicle, the Defendant
24 observed a firearm located between Donovan and James.
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1 James and Donovan made a decision to visit 5151 Medicine Valley Road,
2 White Swan, Washington. The Defendant was aware that John Cagle aka Dobie
3 Jack (hereinafter "Jack") resided at 5151 Medicine Valley Road. Prior to June 8,
4 2019, the Defendant had visited Jack on multiple occasions. The Defendant knew
5 that Michelle Starnes (hereinafter "Starnes") also resided at 5151 Medicine Valley
6 Road.
7

8
9 Donovan parked the vehicle outside of the cattle gate near the main
10 residence. The Defendant exited the vehicle and walked to the main residence.
11 The Defendant had a brief conversation with Jack. Jack invited the Defendant into
12 the main residence. The Defendant entered the residence and spoke with Jack and
13 Starnes. The Defendant ultimately purchased a small amount of
14 methamphetamine. The Defendant advised Starnes that he had a bottle of alcohol
15 but that he left it in the vehicle. The Defendant exited the residence, walked to the
16 vehicle, and grabbed the bottle of alcohol. The Defendant returned to the residence
17 and walked inside. The Defendant and Starnes shared a few drinks from the bottle.
18 Jack showed the Defendant a collection of coins. Jack knew that the Defendant's
19 father collected coins. The Defendant offered to purchase the coins at a later date.
20 Jack advised the Defendant that he could take the coins and repay him at a later
21 date. Jack affectionately called the Defendant "working man" as Jack knew that
22 the Defendant was successfully employed.
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1 The Defendant stood up to leave the residence. At that point, the Defendant
2 observed James and Donovan standing in the doorway to the main residence. As
3 the Defendant walked to the door, James and Donovan did not move. The
4 Defendant found this behavior to be strange. The Defendant ultimately was able to
5 exit the residence. The Defendant walked back to the vehicle. The Defendant
6 entered the vehicle and spoke with Natasha.
7

8
9 After waiting for a period of time, Natasha was upset that Donovan and
10 James had not yet come back to the vehicle. Natasha wanted to leave and travel to
11 Lyle. Natasha was also upset because it was very warm and she was
12 uncomfortable sitting in the vehicle. Natasha asked the Defendant to go find out
13 what was taking so long.
14

15
16 The Defendant exited the vehicle and walked back to the main residence.
17 As he approached the main residence, the Defendant saw Starnes and another
18 female (later identified as Catherine Eneas) sitting in a parked truck. Starnes
19 advised the Defendant that James, Donovan, and Jack were in the game room
20 trailer. Due to prior visits, the Defendant knew that there was a pool table inside of
21 the game room trailer.
22

23
24 The Defendant walked to the doorway of the game room trailer. The
25 Defendant observed Jack, Donovan, and James arguing inside of the trailer. The
26 Defendant observed that James was in possession of a rifle. The Defendant
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1 advised that Natasha had sent him to find out what was taking so long. After
2 speaking to Donovan and James, the Defendant left the trailer and walked back to
3 the vehicle. Natasha was seated in the vehicle listening to music. The Defendant
4 entered the vehicle. A short time later, the Defendant heard what he believed was
5 a gunshot and/or gunshots. However, due to the loud music, the Defendant was
6 not sure exactly what caused the sounds.
7
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9 Shortly thereafter, the Defendant observed Donovan running towards the
10 vehicle. Donovan entered the driver's side door, started the vehicle, and rammed
11 through the cattle gate. The Defendant advised Donovan that Jack would not be
12 happy with damage caused to the cattle gate. Donovan made a statement. After
13 hearing the statement, the Defendant believed that Jack and Starnes had been
14 murdered.
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17 The Defendant and Natasha were very upset. The Defendant advised
18 Natasha that they needed to run away. However, Natasha appeared to be in shock
19 and she was unable to run. The Defendant decided to stay so that he could protect
20 Natasha. The Defendant observed James and Donovan loading Jack's property
21 into the vehicle. James ordered the Defendant and Natasha to help steal items from
22 the Jack residence. The Defendant observed that both James and Donovan were
23 armed with firearms. The Defendant was afraid that if he did not help, James and
24 Donovan would murder him and Natasha. James ordered the Defendant to enter
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1 the main residence and steal property. The Defendant entered the main residence.
2 The Defendant observed Donovan inside of the main residence. The Defendant
3 observed that Donovan had a black pistol. The Defendant assisted in transporting
4 stolen items to the vehicle. The Defendant observed a deceased female (later
5 identified as Catherine Eneas) inside of a pick-up truck.
6

7
8 The Defendant observed a large pick-up truck traveling down the long
9 driveway. The Defendant observed the large pick-up truck stop near where the
10 cattle gate had been located. The Defendant was concerned that James and
11 Donovan would murder the occupants of the large pick-up truck. The Defendant
12 quickly walked to the large pick-up truck. The Defendant made a statement to the
13 driver indicating to the driver that he needed to leave. The large pick-up truck
14 turned around and departed.
15

16
17 The Defendant was ordered to search the property and find gasoline. The
18 Defendant frantically searched the property for gasoline. The Defendant was
19 unable to find gasoline. The Defendant continued to check on Natasha. The
20 Defendant continued to assist James and Donovan as they loaded stolen property
21 into the vehicle. The Defendant observed a large pick-up truck traveling down the
22 driveway. The Defendant observed that this was the same large pick-up truck that
23 previously arrived and departed from the area. The Defendant observed the large
24 pick-up truck park outside of the cattle gate. The Defendant observed a male (later
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1 identified as Thomas Hernandez) exit the large pick-up truck. The Defendant
2 observed Hernandez walk around the property. The Defendant observed that
3
4 James and Donovan were both armed with firearms. The Defendant observed
5 Hernandez walk back towards the large pick-up truck. The Defendant observed
6 James and Hernandez exchanging words. The Defendant observed James yell at
7
8 Hernandez while holding the rifle. The Defendant quickly moved towards Natasha
9 and ducked down. The Defendant heard several gunshots.

10
11 The Defendant got up and saw the large pick-up truck quickly driving away
12 from the residence. The Defendant observed James and Donovan shooting at the
13 large pick-up truck. The large pick-up truck stopped at the end of the driveway.
14
15 The large pick-up truck then turned on the roadway and departed.

16 The Defendant saw Hernandez laying on the driveway. James and Donovan
17 advised that it was time to leave the property. The Defendant advised that he was
18 unable to find gasoline. Donovan and James decided that they would need to steal
19 a vehicle so that they could leave the crime scene. The Defendant was ordered to
20
21 find the keys to the Eneas pick-up truck. The Defendant entered the pick-up truck
22 and found the keys. The Defendant advised Donovan and James that he found the
23
24 keys. However, it was clearly visible that there was something wrong with a tire
25
26 on the pick-up truck.

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1 The Defendant was ordered to remove Eneas from her pick-up truck. The
2 Defendant pulled Eneas out of the truck and placed her on the ground. Donovan
3 was waving a black pistol at the Defendant. The Defendant observed that Natasha
4 appeared to be in shock. The Defendant attempted to get Natasha to get into the
5 pick-up truck. However, Natasha would not go near Eneas. The ^{Defendant} quickly grabbed a
6 door and placed it over Eneas so that Natasha would not have to see the body.
7
8 Natasha and the Defendant entered the rear of the pick-up truck. Donovan was
9 seated in the driver's seat. James was seated in the front passenger seat. Donovan
10 quickly departed from the area.
11
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13 Donovan drove the truck to the residence of Levi Culps. Donovan stopped
14 the truck. James made a statement that he wanted to kill Levi Culps. The
15 Defendant, James, and Donovan exited the truck. After determining that no one
16 was at the residence, the Defendant, James and Donovan quickly moved back to
17 the truck and entered the truck. Donovan was in the driver's seat. The Defendant
18 was in the front passenger seat. James and Natasha were seated in the rear of the
19 pick-up truck.
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23 The Defendant observed that the rifle that James had been carrying was next
24 to him. The Defendant grabbed the rifle and held it in his hands. The rifle was
25 later determined to be a Ruger, model 10/22, caliber .22 LR rifle, bearing serial
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1 number 259-85399. James expressed that he was angry that the Defendant had his
2 rifle. Donovan quickly drove away from the residence.

3
4 The vehicle ultimately broke down on the side of the road. There were
5 multiple firearms in the vehicle. James, Donovan, Natasha, and the Defendant
6 exited the vehicle. The Defendant saw a shotgun in the rear of the vehicle and
7 handed it to Natasha. The Defendant observed that Donovan possessed a black
8 pistol. The Defendant took the Ruger rifle with him. James, Donovan, Natasha,
9 and the Defendant ran into an orchard. Ultimately, the Defendant observed James
10 and Donovan moving towards a residence on Evans Road. The Defendant
11 observed that both Donovan and James were in possession of firearms. The
12 Defendant and Natasha ran in a different direction to get away from James and
13 Donovan. A short time later, the Defendant observed law enforcement officers.
14 The Defendant threw the Ruger rifle into a canal. Law enforcement officers later
15 found the rifle in the canal.

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20 Special Agent R. Almgren ("Agent Almgren"), an interstate nexus expert,
21 inspected the rifle. Agent Almgren determined that the rifle was manufactured in
22 New Hampshire.

23
24 On November 18, 2011, the Defendant was convicted of Possession of
25 Stolen Vehicle, a felony, in Skamania County Superior Court, in case number 11-
26 1-00078-6. The Defendant was sentenced to 14 months imprisonment. The
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1 Defendant knew of his status as a person previously convicted of a crime
2 punishable by imprisonment for a term exceeding one year.

3
4 **7. Waiver of Inadmissibility of Statements:**

5 The Defendant agrees to waive the inadmissibility of statements made in the
6 course of plea discussions with the United States, pursuant to Fed.R.Crim.P. 11(f).
7 This waiver shall apply if the Defendant withdraws this guilty plea or breaches this
8 Plea Agreement. The Defendant acknowledges that any statements made by the
9 Defendant to law enforcement agents in the course of plea discussions in this case
10 would be admissible against the Defendant in the Government's case-in-chief if the
11 Defendant were to withdraw or breach this Plea Agreement.
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15 **8. The United States Agrees:**

16 (a.) Not to File Additional Charges:

17 The United States Attorney's Office for the Eastern District of Washington
18 agrees not to bring any additional charges against the Defendant based upon
19 information in its possession at the time of this Plea Agreement and arising out of
20 Defendant's conduct involving illegal activity charged in the Indictment, unless the
21 Defendant breaches this Plea Agreement any time before or after sentencing.
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25 **9. United States Sentencing Guideline Calculations:**

26 The Defendant understands and acknowledges that the United States
27 Sentencing Guidelines (hereinafter "U.S.S.G.") are advisory to this case and that
28

1 the Court will determine the Defendant's applicable sentencing guideline range at
2 the time of sentencing.

3
4 (a.) Base Offense Level:

5 The United States and the Defendant have no agreement as to the base
6 offense level.

7
8 (b.) Acceptance of Responsibility:

9 If the Defendant pleads guilty and demonstrates a recognition and an
10 affirmative acceptance of personal responsibility for the criminal conduct; provides
11 complete and accurate information during the sentencing process; does not commit
12 any obstructive conduct; and accepts this Plea Agreement, ~~the United States will~~
13 the United States will move for a three (3) level downward adjustment in the
14 offense level for the Defendant's timely acceptance of responsibility, pursuant to
15 U.S.S.G. §3E1.1(a) and (b). The Defendant and the United States agree that the
16 United States may at its option, and upon written notice to the Defendant, not
17 recommend a three (3) level downward reduction for acceptance of responsibility
18 if, prior to the imposition of sentence, the Defendant is charged or convicted of any
19 criminal offense whatsoever or if the Defendant tests positive for any controlled
20 substance.
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1 (c.) Criminal History:

2 The United States and the Defendant have no agreement as to the Defendant
3 criminal history computation. However, the United States and Defendant agree
4 that a criminal history computation ultimately will be determined by the Court
5 after review of the Presentence Investigative Report.
6

7
8 **10. Incarceration:**

9 The United States and the Defendant agree to recommend that the Court
10 impose a sentence below the applicable guideline range if the Defendant fully
11 provides "substantial assistance" as described below in paragraph 10.
12

13 Lastly, the United States and the Defendant agree that if the Defendant fails
14 to provide "substantial assistance," this agreement shall be considered breached
15 and null and void. The United States may then prosecute the Defendant on all
16 available charges.
17

18
19 **11. Substantial Assistance:**

20 The United States agrees to furnish the Defendant an opportunity to provide
21 "substantial assistance," that is, information and assistance in the investigation and
22 prosecution of others concerning multiple homicides that occurred within the
23 external boundaries of the Yakama Nation on or about June 8, 2019. The
24 Defendant understands that whether any such information amounts to substantial
25 assistance is a determination left to the United States Attorney's Office.
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(a.) The Defendant must provide information and assistance in federal investigations and prosecution of others who have the same or greater involvement than the Defendant's involvement in violations of the law.

(b.) The Defendant understands and agrees to participate in full debriefings by federal investigative agencies about the Defendant's knowledge of illegal conduct, at time and places to be decided by these agencies. The Defendant agrees to provide complete, accurate, and truthful information during the debriefings. The Defendant agrees to participate in interviews in regards to on-going federal investigations. The Defendant agrees to provide complete, accurate, and truthful information during the interviews. It is understood that the Defendant may have an attorney present at the debriefings/interviews. The Defendant also agrees to participate in federal court proceedings involving any named or unnamed co-conspirators and any other person involved in criminal activity, by testifying completely and truthfully. Such court proceedings include grand jury proceedings, trials, and sentencing hearings.

(c.) The Defendant agrees that the United States may, at its option and upon written notice to the Defendant, withdraw from this Plea

1 Agreement or modify its recommendation for sentence if the
2 Defendant fails to provide truthful, complete and honest information
3 during debriefings, testimony before the grand jury, or any court
4 proceedings.
5

6 (d.) The Defendant understands that this agreement does not protect him
7 from prosecution for perjury, obstruction of justice, or any other
8 offense should the Defendant commit any crime during the
9 Defendant's cooperation under this agreement.
10

11
12 (e.) It is understood that the United States will inform the sentencing
13 judge about the timing and extent of the Defendant's cooperation.
14

15 (f.) The Defendant understands that, if the United States files a motion
16 indicating the Defendant has provided "substantial assistance," the
17 appropriate reduction shall be determined by the Court for reasons
18 including consideration of the following: (1) the Court's evaluation of
19 the significance and usefulness of the Defendant's assistance, taking
20 into consideration the United States' evaluation of the assistance
21 rendered; (2) the truthfulness, completeness, and reliability of any
22 information or testimony provided by the Defendant; (3) the nature
23 and extent of the Defendant's assistance; (4) any injury suffered, or
24 any danger or risk of injury to the Defendant or the Defendant's
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1 family resulting from the Defendant's assistance; and (5) the
2 timeliness of the Defendant's assistance. See *U.S.S.G. §5K1.1(a)(1)-*
3 *(5)*.
4

5 (g.) The Defendant acknowledges that he has not yet completed providing
6 substantial assistance at the time of the entry into this Plea Agreement
7 and that the United States is not bound to move for a downward
8 departure unless the Defendant provides information that is fully
9 truthful and complete and that the Defendant testified truthfully and
10 completely at any hearing, trial, grand jury proceeding, or other court
11 proceeding if called as a witness by any party. The Defendant
12 understands that it may be necessary to continue his sentencing date in
13 order to verify full compliance with this agreement.
14

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16
17 (h.) The Defendant acknowledges that if he fails to complete his efforts to
18 provide substantial assistance by refusing reasonable requests to meet
19 with law enforcement agents, by providing false information or
20 withholding information from agents, or by failing to testify
21 completely, truthfully, and honestly, the United States is under no
22 obligation to file a motion for a downward departure pursuant, and
23 this agreement shall be considered breached and null and void. The
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1 United States may then prosecute the Defendant on all available
2 charges, including making false statements and perjury.

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4 **12. Criminal Fine:**

5 The United States and the Defendant are free to make whatever
6 recommendation concerning the imposition of a criminal fine that they believe is
7 appropriate.

8
9 **13. Supervised Release:**

10 The United States and the Defendant agree to recommend that the Court
11 impose a three (3) year term of supervised release, and to include special
12 conditions as recommended by United States probation, in addition to the standard
13 conditions of supervised release.

14
15 Pursuant to 18 U.S.C. § 3583(e)(1), the Defendant and/or U.S. Probation
16 may make a motion to terminate the Defendant's supervised release and request
17 discharge/release after the expiration of one year of supervised release, pursuant to
18 the provisions of the Federal Rules of Criminal Procedure. The Defendant
19 understands that the court may consider such a motion, after considering the
20 factors set forth in 18 U.S.C. §§ 3553(a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4),
21 (a)(5), (a)(6), and (a)(7). The United States agrees not to object to such motion if
22 the Defendant had fully complied with all standard and special conditions of
23 supervised release for a period of one year.
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1 **14. Mandatory Special Penalty Assessment:**

2 The Defendant agrees to pay the \$100 mandatory special penalty assessment
3
4 to the Clerk of Court for the Eastern District of Washington, at or before
5 sentencing, pursuant to 18 U.S.C. § 3013 and shall provide a receipt from the Clerk
6 to the United States before sentencing as proof of this payment.
7

8 If the Defendant lacks the financial resources to pay the monetary
9 obligations imposed by the Court, the Defendant agrees to earn the money to pay
10 toward these obligations by participating in the Bureau of Prisons' Inmate
11 Financial Responsibility Program.
12

13 **15. Additional Violations of Law Can Void Plea Agreement:**

14 The Defendant and the United States agree that the United States may at its
15 option and upon written notice to the Defendant, withdraw from this Plea
16 Agreement or modify its recommendation for sentence if, prior to the imposition of
17 sentence, the Defendant is charged or convicted of any criminal offense
18 whatsoever or if the Defendant tests positive for any controlled substance.
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21 **16. Appeal Rights:**

22 The Defendant waives any right to appeal this conviction and the sentence
23 imposed by the Court. The Defendant also waives any right to collaterally attack
24 this conviction and sentence under 28 U.S.C. § 2255, or any other collateral attack
25
26 (except for ineffective assistance of counsel based on facts discovered after the
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1 plea and sentencing). The Defendant acknowledges that this waiver shall result in
2 the dismissal of any appeal or collateral attack the defendant might file challenging
3 the conviction or sentence in this case, except for ineffective assistance of counsel
4 as noted above. If the Defendant files a notice of appeal, a habeas petition, or other
5 collateral attack, notwithstanding this agreement, the Defendant agrees that this
6 case shall, upon motion of the government, be remanded to the district court to
7 determine whether Defendant is in breach of this agreement and, if so, to permit
8 the government to withdraw from the Plea Agreement.
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12 **17. Integration Clause:**

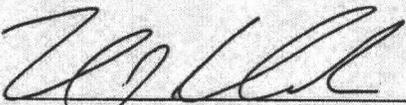
13 The United States and the Defendant acknowledge that this document
14 constitutes the entire Plea Agreement between the United States and the
15 Defendant, and no other promises, agreements, or conditions exist between the
16 United States and the Defendant concerning the resolution of the case. This Plea
17 Agreement is binding only upon the United States Attorney's Office for the
18 Eastern District of Washington, and cannot bind other federal, state or local
19 authorities. The United States and the Defendant agree that this agreement cannot
20 be modified except in a writing that is signed by the United States and the
21 Defendant.
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Approvals and Signatures

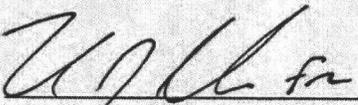
Agreed and submitted on behalf of the United States Attorney's Office for
the Eastern District of Washington.

William D. Hyslop
United States Attorney



THOMAS J. HANLON
Assistant United States Attorney

6/9/20
Date



RICHARD C. BURSON
Assistant United States Attorney

6/9/20
Date

I have read this Plea Agreement and have carefully reviewed and discussed
every part of the agreement with my attorney. I understand and voluntarily enter
into this Plea Agreement. Furthermore, I have consulted with my attorney about
my rights, I understand those rights, and I am satisfied with the representation of
my attorney in this case. No other promises or inducements have been made to
me, other than those contained in this Plea Agreement, and no one has threatened

1 or forced me in any way to enter into this Plea Agreement. I am agreeing to plead
2 guilty because I am guilty.

3
4 
5 MORRIS BRUCE JACKSON
6 Defendant

5/14/20
Date

7 I have read the Plea Agreement and have discussed the contents of the
8 agreement with my client. The Plea Agreement accurately and completely sets
9 forth the entirety of the agreement between the parties. I concur in my client's
10 decision to plead guilty as set forth in the Plea Agreement. There is no legal
11 reason why the Court should not accept Defendant's plea of guilty.
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13
14 
15 KEN THERRIEN
16 Attorney for the Defendant

5/14/20
Date

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