

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	CR. NO. 2:10cr186-MHT
v.)	
)	
RONALD E. GILLEY,)	
)	
Defendant.)	
_____)	

FACTUAL BASIS FOR PLEA

The United States of America, by and through the undersigned attorneys for the Public Integrity Section, Criminal Division, United States Department of Justice, and Ronald E. Gilley (hereinafter the “defendant”), personally and through his undersigned counsel, hereby agree to the following statement of facts:

That from in or around 2009 and continuing thereafter until in or around 2010, in the Middle District of Alabama and elsewhere:

1. The defendant owned a controlling interest in the Country Crossing real estate, entertainment, and gambling development in Houston County, Alabama, which sought to offer “electronic bingo” gambling machines to the public.
2. MILTON E. MCGREGOR owned a controlling interest in Macon County Greyhound Park, Inc., also known as Victoryland, in Macon County, Alabama, and Jefferson County Racing Association, in Jefferson County, Alabama, as well as ownership interests in other entertainment and gaming facilities in Alabama, which offered or sought to offer “electronic bingo” gambling machines to the public.
3. JARRELL W. WALKER JR. was an employee and spokesman for the defendant

and Country Crossing.

4. JARROD D. MASSEY was employed as a registered lobbyist and consultant with his own lobbying firm, Mantra Governmental, which was located in Montgomery, Alabama. The defendant was one of MASSEY'S largest clients.

5. JENNIFER POUNCY was a registered lobbyist who worked for MASSEY

6. THOMAS E. COKER was a registered lobbyist operating a lobbying and consulting business in Montgomery, Alabama. MCGREGOR was one of COKER's largest clients.

7. ROBERT B. GEDDIE JR. was a registered lobbyist and a partner in a lobbying and consulting business in Montgomery, Alabama. GEDDIE worked as a lobbyist for MCGREGOR.

8. The Alabama Legislature was a political subdivision within the State of Alabama. In fiscal years 2009 and 2010, the State of Alabama received more than \$10,000 per year in funds from the United States Government in the form of grants, contracts, subsidies, loans, guarantees, insurance, and other forms of federal assistance.

9. The Alabama Legislature was composed of two chambers: the House of Representatives and the Senate. Members of the House of Representatives and the Senate were agents of the State of Alabama.

10. LARRY P. MEANS was a member of the Alabama Senate.

11. JAMES E. PREUITT was a member of the Alabama Senate.

12. QUINTON T. ROSS JR. was a member of the Alabama Senate.

13. HARRI ANNE H. SMITH was a member of the Alabama Senate.

14. Legislator 1 was a member of the Alabama House of Representatives.

15. Legislator 2 was a member of the Alabama Senate.

16. Legislator 3 was a member of the Alabama House of Representatives.

17. JOSEPH R. CROSBY was a legislative analyst with the Legislative Reference Service. The Legislative Reference Service was division of the Alabama Legislature and served as a non-partisan drafting and legal research office that provided assistance to both chambers of the Alabama Legislature. CROSBY was an agent of the State of Alabama.

18. Senate Bill 380 ("SB380"), which was introduced in the Alabama Legislature, proposed an amendment to the Alabama Constitution permitting the operation and taxation of electronic bingo in Alabama. The defendant and MCGREGOR supported SB380.

19. SB380 would have generated over \$5,000 in annual state and local tax proceeds.

20. The defendant and MCGREGOR, and lobbyists and other individuals working for them, gave, offered, and agreed to give money and other things of value worth millions of dollars to members of the Alabama Legislature in return for their official action.

21. The things of value the defendant, MCGREGOR and others offered and provided to public officials included, but were not limited to, money, campaign contributions, campaign appearances by country music celebrities, political polls, and fundraising assistance.

22. The defendant, MCGREGOR and others provided and offered to provide those things of value to members of the Alabama Legislature in return for official acts taken to effect the passage of pro-gambling legislation, including promising to vote, and voting for SB380.

23. As part of the course of conduct described above, the defendant, MCGREGOR and others committed acts involving multiple public officials, including, but not limited to

Legislator 1, Legislator 2, Legislator 3, MEANS, PREUITT, ROSS, SMITH, and CROSBY.

24. The defendant and others attempted to conceal the true nature, source, and control of the payments made to members of the Alabama Legislature in return for their favorable votes on and support of SB380 by engaging in financial transactions and disguising illicit payments through political action committees and using conduit contributors, and other means.


The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for the defendant's guilty plea to the charges against him. It does not include all of the facts known to the defendant concerning activity in which he engaged.

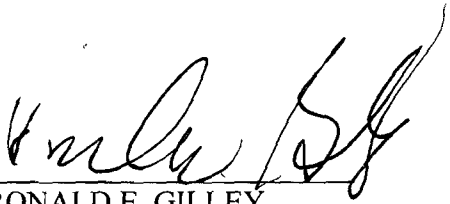
Dated: This 22nd day of April 2011

Respectfully submitted,

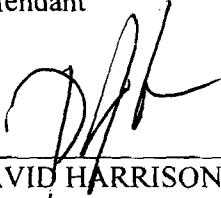
JACK SMITH
Chief
Public Integrity Section
Criminal Division
U.S. Department of Justice

By:


Justin V. Shur
Deputy Chief
Public Integrity Section
Criminal Division
U.S. Department of Justice
1400 New York Avenue, NW
Washington, DC 20005
(202) 514-1412



RONALD E. GILLEY
Defendant



DAVID HARRISON
Counsel for the defendant