

Harold Morton Organization

STATEMENT OF FACTS

The government expects the evidence in this case will establish all elements of the offense and will show the following.

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 - On November 15, 1977, Gloria Roe, Sandra Jones and HAROLD MORTON were driven to the Detroit, Michigan airport. At the airport Jones and Roe purchased tickets to New York City with funds provided by MORTON. All three boarded a plane and flew to New York City, arriving before noon.
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 - After deplaning at JFG Airport, all three individuals were transported to Manhattan by taxi, where Roe and Jones purchased in cash roundtrip tickets to Amsterdam, the Netherland. Again, the airfare was paid for by MORTON. Roe and Jones then obtained passports, pursuant to instructions from Morton.
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 - MORTON, Jones and Roe were then transported by taxi to JFK Airport and boarded a KLM flight to Amsterdam. Once in Amsterdam all three were transported to the Amsterdam Marriot Hotel, where two rooms were obtained in the names of Roe and Jones. Roe and Jones spent November 16 and 17 sightseeing and shopping.
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 - On November 18, 1977, Gloria Roe was summoned into Jones' room where she

was shown a package and was instructed to secrete it under her girdle in her crotch area. Roe then observed that Jones had also concealed a similar package on her body in the same fashion. After the package was concealed, MORTON requested Roe to walk in front of him and he commented, "it looks fine." All three then took a taxi to the airport and boarded a flight to New York City.

• On the same date (November 18, 1977) Roe, Jones and MORTON landed at JFK Airport and presented themselves in different lines for routine customs search. Both Jones and Roe were detained, and after a secondary search was performed on both the concealed packages were discovered. A field test of the substance found in the package revealed that each was carrying over one-half pound of 29% pure heroin. HAROLD MORTON was also detained but no contraband was found on his person or in his luggage.

• After the packages were found both Jones and Roe were interviewed separately by Drug Enforcement Administration (DEA) agents. Both waved their constitutional rights and stated that they were carrying the heroin for HAROLD MORTON. Jones said she would cooperate with the agents and that she was willing to testify against MORTON. All three were arrested and transported to the Metropolitan Correctional Center in New York City.

• On November 23, 1977, HAROLD MORTON was released from custody on a \$100,000 personal recognizance bond secured by property in Detroit, Michigan.

• On December 5, 1979, both Gloria Roe and Sandra Jones were represented in Federal Court for the Eastern District of New York by Ms. Gail S. Benson, Esq., who was employed by S. Allan Early, Esq., from Detroit. On that date their bonds were reduced to \$25,000 personal recognizance and both were released from custody. Roe and Jones were provided airline tickets by Ms. Benson and on December 5, 1977, all three flew to Detroit. Upon arriving in Detroit Ms. Benson told Roe and Jones she would meet them at her office on the following day.

• On December 6, 1977, Roe and Jones went together to the law offices of S. Allan Early at 810 Buhl Building in Detroit, Michigan. Ms. Benson took them into

a conference room and departed. HAROLD MORTON then entered the room.

- After greeting each of the women, MORTON inquired whether each was willing to "do time" on her pending charge. Roe stated that if MORTON would take care of her family she was willing to go to jail. Jones replied she did not want to be confined. MORTON then told Roe to leave the room.
- Approximately fifteen minutes later both Jones and MORTON departed. Jones was observed to be extremely upset and asked Roe to take her to Roe's apartment. Jones confided to Roe that she was afraid and wanted to leave town immediately. Later that same day, Jones contacted her sister in Montgomery, Alabama to wire her some money for an airline ticket.
- At 2:55 a.m on December 7, 1977, Sandra Jones departed Detroit, Michigan enroute to Montgomery, Alabama to visit her sister and mother who was there attending a funeral. Between the evening of December 8, 1977 and the early morning of December 9, 1977 Sandra Jones and her mother flew from Montgomery, Alabama to their home in San Diego, California.
- On the evening of December 6, 1977, the day MORTON met with Jones and Roe at Early's office, MORTON and Hilda Singleton checked into the Michigan Inn, in Southfield, Michigan.
- On the morning of December 7, 1977, Thornell McKnight received a telephone call from HAROLD MORTON requesting McKnight to meet with him at the Michigan Inn as soon as possible. Sometime between eight and ten o'clock in the morning McKnight met with MORTON in his room at the Michigan Inn. During this meeting MORTON explained to McKnight that he had been arrested in New York City with two of "his girls," and they were caught carrying heroin that he had purchased in Amsterdam. MORTON expressed that he was very worried about one of his girls, A "Miss S.," who he felt had "talked" to the authorities and who would probably testify against him in his pending case. MORTON told McKnight that he needed McKnight to do a "job" for him. During the majority of this conversation Singleton was present.

- MORTON and McKnight discussed various strategies to insure that Jones would not testify against MORTON. The alternatives raised included bribing her with money, having her voluntarily go "underground" and leave the country, threatening her family, or killing her.
- MORTON told McKnight that he wanted to talk with Jones before he decided for sure what alternative would be adopted. He stated he wanted McKnight to take him to Gloria Roe's house since he knew Jones was staying there.
- After the conversation, MORTON went into the restroom. While he was there McKnight asked Singleton if she would insure that MORTON paid McKnight for what he was going to do to Jones. She told him not to worry, that she would "guarantee" McKnight would be paid.
- McKnight and MORTON departed the Michigan Inn and McKnight drove MORTON in his Checker Cab to Gloria Roe's residence at 2674 Richton in Detroit, Michigan. At her residence, MORTON told McKnight to get Jones and bring her to the cab. McKnight went to the door and asked Roe if Jones was there. Roe informed him that Jones had departed for Alabama earlier that same morning to visit her sister. McKnight returned to the cab and relayed this information to MORTON. MORTON then went into Roe's residence and talked with her alone for approximately ten minutes.
- When MORTON returned to the cab he was visibly irritated and told McKnight that "Miss S" had run out on him" and that McKnight must kill her. After further discussions MORTON agreed to pay McKnight \$3,500 to murder Jones. MORTON provided McKnight with Jones' telephone number and address in San Diego.
- In the early evening of December 7, 1977, McKnight met with MORTON and Singleton at Ciro's Motel in Detroit. In Singleton's presence, MORTON paid McKnight \$1,500 in cash as a down payment for killing Jones.

- After receiving the money McKnight went to Detroit Office Equipment Inc., and paid a \$200 down payment on an \$800 order for furniture for his wife.

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