IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JAIME JONES

Criminal No. 21-417
[UNDER SEAL]

INDICTMENT MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and Jeffrey R. Bengel, Assistant United States Attorney for said District, and submits this Indictment Memorandum to the Court:

I. THE INDICTMENT

A federal grand jury returned a twelve-count Indictment against the above-named defendant for alleged violations of federal law:

COUNTS	OFFENSE/DATE	TITLE/SECTION
One through Twelve	Wire Fraud June 17, 2020 (Count One) June 17, 2020 (Count Two) June 25, 2020 (Count Three) June 25, 2020 (Count Four) June 25, 2020 (Count Five) June 26, 2020 (Count Six) June 26, 2020 (Count Seven) June 29, 2020 (Count Eight) July 2, 2020 (Count Nine) July 10, 2020 (Count Ten) July 19, 2020 (Count Eleven) August 23, 2020 (Count Twelve)	18 U.S.C. § 1343

FILED
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WEST. DIST. OF PENNSYLVANIA

II. ELEMENTS OF THE OFFENSES

A. As to Counts One through Twelve:

In order for the crime of Wire Fraud, in violation of 18 U.S.C. § 1343, to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. That JAIME JONES knowingly devised a scheme to defraud or to obtain money or property by materially false or fraudulent pretenses, representations or promises or willfully participated in such a scheme with knowledge of its fraudulent nature;

2. That JAIME JONES acted with the intent to defraud; and

3. That in advancing, furthering, or carrying out the scheme, JAIME JONES transmitted any writing, signal, or sound by means of a wire, radio, or television communication in interstate commerce or caused the transmission of any writing, signal, or sound of some kind by means of a wire, radio, or television communication in interstate commerce.

Third Circuit Model Criminal Jury Instruction 6.18.1343.

III. PENALTIES

A. As to Counts One to Twelve: Wire Fraud (18 U.S.C. § 1343):

(1) imprisonment for not more than twenty (20) years;

(2) a fine not more than the greater of;

(a) $250,000 (18 U.S.C. § 3571(b)(3));

or

(b) an alternative fine in an amount not more than the greater of twice the gross pecuniary gain to any person or twice the pecuniary loss to any person other than the defendant, unless the imposition of this alternative fine would unduly complicate or prolong the sentencing process (18 U.S.C. § 3571(d));

(3) a term of supervised release of not more than three (3) years (18 U.S.C. §§ 3559, 3583);

(4) Any or all of the above.

IV. MANDATORY SPECIAL ASSESSMENT

A mandatory special assessment of $100.00 must be imposed at each count upon which the defendant is convicted pursuant to 18 U.S.C. § 3013.

V. RESTITUTION

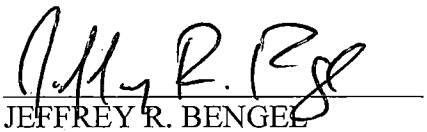
Restitution may be required in this case as to Counts One through Twelve together with any authorized penalty, as part of the defendant's sentence pursuant to 18 U.S.C. §§ 3663, 3663A, and 3664.

VI. FORFEITURE

Forfeiture is not applicable in this case.

Respectfully submitted,

STEPHEN R. KAUFMAN
Acting United States Attorney



JEFFREY R. BENGEL
Assistant U.S. Attorney
DC ID No. 1018621