

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED:** \_\_\_\_\_  
**JEROME CLINTON FAISON,** : **VIOLATION:**  
**DAVID THOMAS, JR.** : **18 U.S.C. § 2314**  
: **(interstate transportation of stolen goods - 1**  
: **count)**  
: **18 U.S.C. § 2 (aiding and abetting)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Morgan Jewelers, a jewelry store located at 3651 Wall Avenue inside the NewGate Mall in Ogden, Utah, was engaged in the retail sale of jewelry, in the form of necklaces, bracelets, and diamond rings, among other items.

2. On or about December 27, 2012, in the District of Utah, the Eastern District of Pennsylvania and elsewhere, defendants

**JEROME CLINTON FAISON and  
DAVID THOMAS, JR.**

unlawfully transported in interstate commerce from Ogden, Utah to Philadelphia, Pennsylvania goods and merchandise with a value in excess of \$5,000, that is, approximately \$100,000 in diamond rings and other jewelry, and aided and abetted the transportation of such goods and merchandise, knowing the same to have been stolen, converted and taken by theft.

In violation of Title 18, United States Code, Sections 2314 and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Section 2314, set forth in this indictment, the defendants

**JEROME CLINTON FAISON and  
DAVID THOMAS, JR.**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

difficulty; it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

  
**ZANE DAVID MEMEGER**  
*United States Attorney*

No. \_\_\_\_\_

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JEROME CLINTON FAISON and  
DAVID THOMAS, JR.

INDICTMENT

Counts

**18 U.S.C. § 2314 (interstate transportation of stolen goods - 1 count)**

**18 U.S.C. § 2 (aiding and abetting)**

**Notice of forfeiture**

A true bill.

.....  
Foreman

Filed in open court this ..... day,

of ..... A.D. 20 .....

.....  
Clerk

Bail, \$ .....

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