

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

CASE NO. 3:17-cr-58-J-39JBT
Cts 1-10: 18 U.S.C. § 514(a)(2)

v.

VERDELL TERRIA JONES

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about November 14, 2015, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Certified Funds" in the amount of \$29,000, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

FILED
4/5/2017
CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

COUNT TWO

On or about November 30, 2015, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Cashier's Check" in the amount of \$75,000.00, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

COUNT THREE

On or about December 11, 2015, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Cashier's Check" in the amount of \$18,140.90, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

COUNT FOUR

On or about December 15, 2015, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Money Order" in the amount of \$27,689.96, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

COUNT FIVE

On or about December 23, 2015, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Cashier Check" in the amount of \$103,973.65, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

COUNT SIX

On or about February 25, 2016, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Cashier Check" in the amount of \$151,880.56, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

COUNT SEVEN

On or about March 7, 2016, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Cashier Check" in the amount of \$8,850.00, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

COUNT EIGHT

On or about March 15, 2016, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Promissory Note" in the amount of \$52,141.00, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

COUNT NINE

On or about March 17, 2016, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "Promissory Note" in the amount of \$42,309.00, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

COUNT TEN

On or about March 17, 2016, in the Middle District of Florida, and elsewhere, the defendant,

VERDELL TERRIA JONES,

with intent to defraud, did pass, utter, present, offer, broker, and possess, and attempt and cause the same, within the United States, a false and fictitious instrument, document, and other item, to-wit: a counterfeited document titled "International Bill Exchange" in the amount of \$116,963.32, appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of the United States and a political subdivision of the United States.

In violation of 18 U.S.C. § 514(a)(2).

A TRUE BILL,

Michelle E. Smith
Foreperson

W. STEPHEN MULDROW
Acting United States Attorney

By: Kevin C. Frein
KEVIN C. FREIN
Assistant United States Attorney

By: Frank Talbot
FRANK TALBOT
Assistant United States Attorney
Acting Chief, Jacksonville Division

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

VERDELL TERRIA JONES

INDICTMENT

Violations: 18 U.S.C. § 514(a)(2)

A true bill,

Michelle E. Smith
Foreperson

Filed in open court this 5th day

of April, 2017.

Megan O'Keefe
Clerk

Bail \$ _____
