

FILED

JAN 17 2018

**CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK**

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10 **UNITED STATES OF AMERICA,**
11
12 **Plaintiff,**
13 **v.**
14 **JASON E. MININGER,**
15 **Defendant.**

CASE NO. 2:18-CR-0013 TLN

**VIOLATION: 18 U.S.C. § 1343 – Wire Fraud; 18
U.S.C. § 1957 – Engaging in Monetary Transaction
Involving Criminally Derived Proceeds; 18 U.S.C.
§ 981(a)(1)(C), 28 U.S.C. § 2461(C) – Criminal
Forfeiture**

16
17 **I N F O R M A T I O N**

18 **COUNT ONE: [18 U.S.C. § 1343 – Wire Fraud]**

19 **The United States Attorney charges: THAT**

20 **JASON E. MININGER,**

21 **defendant herein,**

22 **1. Beginning on no later than approximately January 2014, and continuing up to the date of**
23 **at least May 2017, MININGER did devise and intend to devise a scheme and artifice to defraud**
24 **individuals and to obtain money from such individuals by means of materially false and fraudulent**
25 **pretenses, representations and promises—to wit, soliciting and directing individuals to provide**
26 **MININGER money to be invested by MININGER on the individual’s behalf when, in truth and in fact,**
27 **MININGER did not invest, or intend to invest the individuals’ money but instead used it for his own**
28 **personal benefit.**

1 2. On or about January 10, 2014, in the State and Eastern District of California and
2 elsewhere, for the purpose of executing and attempting to execute the aforementioned scheme and
3 artifice to defraud, MININGER did knowingly cause to be sent or delivered by interstate wire
4 transmission an electronic transfer of \$20,000,00.

5 In violation of Title 18, United States Code, Section 1343.

6
7 COUNT TWO: [18 U.S.C. § 1957 – Engaging in Monetary Transaction Involving Criminally
8 Derived Proceeds]

9 The United States Attorney further charges: THAT

10 JASON E. MININGER,

11 defendant herein, on or January 13, 2014, in the Eastern District of California, did knowingly engage
12 and attempt to engage in a monetary transaction affecting interstate commerce, in criminally derived
13 property of a value greater than \$10,000, such funds having been derived from specified unlawful
14 activity, that is, wire fraud in violation of Title 18, United States Code, Section 1343, all in violation of
15 Title 18, United States Code Section 1957.

16
17 FORFEITURE ALLEGATION [18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), Fed R. Crim.P.
18 32.2(a) - Criminal Forfeiture]

19 1. Upon conviction of the offenses alleged in Counts One through Two of this Information,
20 defendant Jason E. Mininger shall forfeit to the United States, pursuant to Title 18, United States Code,
21 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal,
22 constituting or derived from proceeds traceable to said violations.

23 2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
24 through Two of this Information:

- 25 (a) cannot be located upon the exercise of due diligence;
26 (b) has been transferred or sold to, or deposited with, a third person;
27 (c) has been placed beyond the jurisdiction of the Court;
28 (d) has been substantially diminished in value; or

1 (e) has been commingled with other property which cannot be subdivided without
2 difficulty;

3 it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1),
4 incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of
5 said defendant, up to the value of the property subject to forfeiture.

6 Dated: January 17, 2018

7 McGREGOR W. SCOTT
United States Attorney

8
9 By: 

TODD A. PICKLES
Assistant United States Attorney

United States v. Jason Mininger
Penalties for Information

Defendant

JASON E. MININGER

COUNT 1:

VIOLATION: 18 U.S.C. § 1343 – Wire Fraud

PENALTIES: A maximum of 20 years in prison;
Fine of up to \$250,000; or twice the gross loss or gross gain, both fine and imprisonment; and/or
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 2:

VIOLATION: 18 U.S.C. § 1957 – Engaging in Monetary Transaction Involving
Criminally Derived Proceeds

PENALTIES: A maximum of 10 years in prison;
Fine of up to \$250,000; or twice the gross loss or gross gain, both fine and imprisonment; and/or
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. §§ 982(a)(2), and 28 U.S.C. § 2461(c) – Criminal Forfeiture

PENALTIES: As stated in the charging document