

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA)	CRIM. NO. <u>6:18-1113</u>
)	
)	18 U.S.C. § 371
)	18 U.S.C. § 1343
)	18 U.S.C. § 1001
v.)	18 U.S.C. § 2
)	18 U.S.C. § 982(b)(1)
)	28 U.S.C. § 2461(c)
ANTONIO LAMAZO JONES)	

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INDICTMENT

The Grand Jury charges that:

General Allegations

1. Government Contractor # 1 is a multi-national corporation headquartered in Irving, TX. In 2008, the United States Army awarded a contract to Government Contractor # 1 and two other companies to provide logistics services to the U.S. Department of Defense, other U.S. government agencies, and coalition forces around the world (the "Contract").
2. Government Contractor # 1's U.S. government contracting group maintains an office in the Greenville, South Carolina area.
3. ANTONIO LAMAZO JONES ("JONES") was a Department of Defense contractor who worked for Government Contractor #1 and other U.S. government contractors at various locations in Afghanistan.
4. R.S., a citizen of Bosnia and Herzegovina, was a Department of Defense contractor who worked for Government Contractor #1 and other U.S. contractors in Afghanistan.

5. Wolverine, Inc. (“Wolverine”) was an entity created by JONES. JONES and R.S. used Wolverine to assist clients in obtaining jobs, including with Government Contractor #1 and other U.S. government contractors. JONES’ clients paid him for job placement services.

6. Government regulations prescribe training for people employed in various fields, including in the handling of hazardous materials (“HAZMAT”). U.S. executive branch agencies, including the Departments of Defense, Army, Navy, Air Force, and Transportation, issue official training certificates to ~~individual~~ ^{individual upon} that complete government-prescribed training in such fields, including the handling of HAZMAT. These training certificates may serve as proof that an individual has received training and is authorized to work in a particular field, including the handling of HAZMAT.

Count One
Conspiracy to Commit Wire Fraud and to Defraud the United States
(18 U.S.C. § 371 and 2)

7. From in or about January 2012, until and including May 2015, in the District of South Carolina and elsewhere, the Defendants, JONES and R.S., along with others known and unknown to the Grand Jury, did knowingly combine, conspire, confederate, and agree among themselves and with other persons, known and unknown to the Grand Jury:

- a. to devise a scheme and artifice to defraud Government Contractor #1, other U.S. government contractors, and the United States by obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, and to transmit and cause to be transmitted certain wire communications in interstate and foreign commerce for the purpose of executing the scheme; and
- b. to defraud the United States of and concerning its right to have its business and its affairs, and particularly the transaction of the official business of the Departments of

Defense, Army, Navy, Air Force, Transportation, and others, conducted honestly and impartially, free from corruption, fraud, improper and undue influence, dishonesty, unlawful impairment and obstruction, in violation of Title 18, United States Code, Sections 371 and 1343.

Object of the Conspiracy

8. The principal object of the conspiracy was for JONES and R.S. to enrich themselves by defrauding Government Contractor #1, other U.S. government contractors, and the United States, by fraudulently inflating the qualifications of their clients and JONES in order to obtain employment for their clients and JONES with Government Contractor #1 and other U.S. government contractors.

Manner and Means of the Conspiracy

9. The manner and means by which JONES and R.S. would and did carry out the conspiracy included, but were not limited to, the following:

- a. JONES and R.S. claimed that they could assist clients in obtaining U.S. government contractor jobs in Afghanistan and elsewhere with Government Contractor #1 and other U.S. government contractors. They operated a business association called Wolverine for the purpose of assisting clients in obtaining employment.
- b. JONES and R.S. identified potential clients based on their own experience working with U.S. government contractors in Afghanistan or, in some cases, prospective clients contacted JONES and R.S. to request assistance in finding jobs.
- c. JONES and R.S. collected personal information from the clients, including copies of the clients' resumes.

- d. JONES and R.S. set up commercial email accounts in the clients' names in order to apply for U.S. government contractor jobs on the clients' behalf.
- e. JONES and R.S. falsified information on their clients' resumes to make the clients look more attractive than they were in fact to potential U.S. government contractors, including Government Contractor #1.
- f. JONES and R.S. created and possessed counterfeit U.S. government training certificates for their clients that they knew to be required or highly desired by Government Contractor #1 and other U.S. government contractors.
- g. JONES and R.S. applied for jobs with Government Contractor #1 and other U.S. government contractors on the clients' behalf and supplied, by email (using their own accounts and the commercial email accounts they had set up for this purpose) and via internet websites, among other things, the clients' falsified resumes and/or counterfeit training certificates, which they had created, with the clients' applications.
- h. JONES and R.S. also provided, by email, falsified resumes, counterfeit training certificates, and other falsified documents directly to their clients, who would use the falsified documents to apply for positions with Government Contractor #1 and other U.S. government contractors on their own.
- i. Government Contractor #1 hiring personnel based in the District of South Carolina and elsewhere reviewed and relied on the false and fraudulent application materials, including resumes and counterfeit training certificates, which JONES and R.S. created and supplied or caused to be supplied to Government Contractor #1. Hiring personnel for U.S. government contractors also reviewed and relied on false and fraudulent application materials created and/or supplied to them by JONES and R.S.

- j. Government Contractor #1 ultimately hired several of JONES' and R.S.'s clients, relying in part on the false information that JONES and R.S created and provided or caused to be provided to Government Contractor #1. Government Contractor #1 notified the clients of their hiring by sending them an Offer Letter by email.
- k. Other U.S. government contractors hired employees relying, in part, on false information that JONES and R.S created and provided or caused to be provided to the other U.S. government contractors.
- l. Once a client was hired by Government Contractor #1 or another U.S. government contractor, JONES and R.S. would request up to \$4,000 dollars from the client for their services.
- m. JONES would receive payments from his clients via electronic money transfer services.

Overt Acts

10. In furtherance of the conspiracy and to effect its objects, the following overt acts, among others, were committed in the District of South Carolina and elsewhere:
- a. On October 30, 2012, R.S. sent an email to JONES with a subject "Email accounts – [L.J. and B.E.]," in which she provided JONES with the email account and password for commercial email accounts that had been set up for two clients.
 - b. On or about November 4, 2012, JONES sent an email to R.S. concerning a job advertised by a U.S. government contractor, in which he wrote "I don't want you to put any body in for this position yet I'm trying to figure out who we have that I can change their resume to fit this psotion who do we have have the experience and can pull it off."

- c. On or about November 4, 2012, R.S. replied to JONES, writing “maybe [L.J.], just to re-do his resume a little bit more.”
- d. On or about November 17, 2014, JONES and R.S. emailed a version of L.J.’s resume containing false information regarding L.J.’s qualifications to Government Contractor #1 hiring personnel.
- e. On or about October 30, 2012, R.S. sent an email to JONES with a subject “Question on email account for [K.W.]” in which she wrote “Those are two email addresses you have on [K.W.], which one is good one, and what is a password?”
- f. On or about October 30, 2012, JONES replied, writing “This is the right email the password is bluejay2011.”
- g. JONES and R.S. generated a document titled “Wolverine Payment [REDACTED] Revised Plan [K.W.].docx,” which set forth a schedule of payments totaling \$2,500 to be paid to Wolverine, Inc. via an electronic payment service for JONES and R.S.’s assistance in obtaining employment with Government Contractor #1 for [K.W.].
- h. On or about August 2, 2014, JONES sent an email to R.S. with a subject “[D.W.] Needs Hazmat and 60K Loader License.”
- i. On or about December 21, 2012, R.S. sent an email to JONES with a subject “Bullets/experience added on [R.J.] Resume,” in which she wrote, “Take a look, what do you think? I added stock/inventory/warehouse bullets on his resume under the same company you have listed...cause he had only customer service,, and with this i could apply him on more positions and they kind of go together, and give him more experience.. what i added on is highlighted in yellow... Is it good?” JONES replied on or about December 22, 2012, writing “It is good....”

- j. On or about April 19, 2014, JONES sent an email to M.B., in which he wrote “I need you to sign the bottom of this [training certificate] under where the two name are like a professional signature and scan it back to me,” attached to which was an unsigned counterfeit training certificate. On or about April 20, 2014, M.B. emailed a signed copy of the counterfeit training certificate back to JONES.
- k. On or about On June 18, 2014, R.H. sent an email to JONES with a subject “Re: HAZMAT CERT,” in which he wrote “Bruh if ypu can just get me my cert Ill apply back to [a U.S. government contractor] as a TC. Lemme know sumthin when you can.” JONES replied to R.H. on or about June 18, 2014, writing, “What was your hire date with [the U.S. government contractor] and what was your date you join military and what branch you are in I will have your cert by tomorrow.” Shortly thereafter, JONES and R.S. generated a counterfeit training certification for R.H.
- l. On or about April 1, 2014, R.S. sent an email to JONES in reference to a job application to a U.S. government contractor for A.A., in which she wrote, “i dont know why they sending this I went thru yours and his application once again step by step and everything is there... resume and 3 references they are referring to.. I will contact their support desk to see what is going on... I dont know if Toni has hazmat? do you want me to make one for him?”
- m. On or about April 2, 2014, R.S. sent an email to JONES in which she wrote, “What do you think? I dont know if you wanna use this one it is almost identical to your hazmat,” attached to which is a counterfeit training certificate.

All in violation of Title 18, United States Code, Sections 371 and 2.

Counts Two through Ten
Wire Fraud
(18 U.S.C. § 1343 and 2)

11. Paragraphs 1 through 6 and 8 through 10 of this indictment are re-alleged and incorporated by reference as if set out in full.

12. From in or about January 2012, until and including May 2015, as specified in each count below, in the District of South Carolina and elsewhere, for the purpose of executing the above-described scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, JONES and R.S., and others known and unknown to the Grand Jury, did knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of wire communications, certain writings, signs, signals, and sounds, as set forth in each count below:

Count	Approximate Date	Wire to / through	Description of Wire
2	August 6, 2014	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to A.A. with offer of employment.
3	October 13, 2014	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to JONES with offer of employment.
4	October 13, 2014	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to R.H. with offer of employment.
5	October 25, 2014	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to R.J. with offer of employment.
6	October 27, 2014	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to D.B. with offer of employment.
7	October 30, 2014	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to B.T. with offer of employment.
8	November 4, 2014	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to K.W. with offer of employment.

9	November 26, 2014	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to L.J. with offer of employment.
10	January 19, 2015	South Carolina to North Carolina	Email sent from FGG.Staffing@[redacted].com to D.W. with offer of employment.

All in violation of Title 18, United States Code, Section 1343.

Counts Eleven through Thirteen
False Statements
(18 U.S.C. § 1001(a)(3) and 2)

13. Paragraphs 1 through 6 and 8 through 10 of this indictment are re-alleged and incorporated by reference as if set out in full.

14. From in or about January 2012, until and including May 2015, as specified in each count below, in the District of South Carolina and elsewhere, JONES and R.S. did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of agencies of the executive branch of the Government of the United States, to wit: by making, using, and causing to be used false training certificates to fraudulently obtain employment for JONES and his clients with Government Contractor #1 and other U.S. government contractors on U.S. government contracts, including the Contract, in the District of South Carolina, and elsewhere, well knowing and believing the training certificates contained false information.

Count	Executive Branch Agency	Description of False Document
11	Department of Transportation	Counterfeit DOD Preparation of Hazardous Materials for Transportation certificate purportedly for R.H.
12	Department of the Army	Counterfeit Technical Transportation of Hazardous Materials purportedly for JONES.
13	Department of the Air Force	Counterfeit Hazardous Materials Preparer Course certificate purportedly for D.W.

All in violation of Title 18, United States Code, Sections 1001(a)(3) and 2.

FORFEITURE ALLEGATIONS

15. Upon conviction for violations of Title 18, United States Code, Section 1343, as charged in this indictment, JONES shall forfeit to the United States any property, real or personal, which constitutes or is derived from any proceeds they obtained, directly or indirectly, as the result of such violation, and any property traceable to such property.

16. Pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of the defendant for the violation charged in this indictment includes, but is not limited to, the following:

Proceeds/ Money Judgment:

A sum of money equal to all property the defendant obtained as a result of the offenses charged in the information, and all interest and proceeds traceable thereto, in that such sum represents the value of proceeds the defendant obtained, directly or indirectly, as the result of their violations of 18 U.S.C. § 1343, as charged in this indictment.

17. If any of the property described above, as a result of any act or omission of the defendant:

- 1) cannot be located upon the exercise of due diligence;
- 2) has been transferred or sold to, or deposited with, a third party;
- 3) has been placed beyond the jurisdiction of the Court;
- 4) has been substantially diminished in value; or
- 5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the said defendant

up to the value of the forfeitable property described above.

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

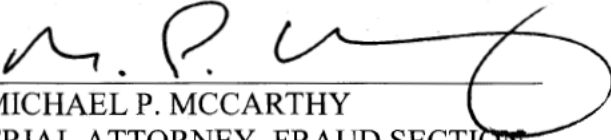
A True BILL

Redacted

FOREPERSON

SANDRA L. MOSER
ACTING CHIEF, FRAUD SECTION
CRIMINAL DIVISION
UNITED STATES DEPARTMENT OF JUSTICE

By:


MICHAEL P. MCCARTHY
TRIAL ATTORNEY, FRAUD SECTION

USA v. ANTONIO LAMAZO JONES

MAXIMUM PENALTIES FOR 18 USC 371 – COUNT 1

1. Fine of \$250,000.00 and/or
2. Imprisonment for five (5) years, and
3. Supervised release of three (3) years, and
4. Special assessment of \$100.00

MAXIMUM PENALTIES FOR 18 USC 1343 – COUNTS 2 - 10

1. Fine of \$250,000.00 and/or
2. Imprisonment for twenty (20) years, and
3. Supervised release of three (3) years, and
4. Special assessment of \$100.00

MAXIMUM PENALTIES FOR 18 USC 1001(a)(3) – COUNTS 11 - 13

1. Fine of \$250,000.00 and/or
2. Imprisonment for five (5) years, and
3. Supervised release of three (3) years, and
4. Special assessment of \$100.00

CRIMINAL COVER SHEET

DEFENDANT ADDRESS:

ALIAS(ES):

Antonio Lamazo Jones

N/A



JUVENILE: YES NO

DATE OF BIRTH:



SSN:



OCDETF CASE? YES / NO

OFFENSE: Title(s): Conspiracy, Wire Fraud, False Statements

Section(s): 18 USC 371, 1343, 1001

LIST THE COUNTY WHERE THE OFFENSE OCCURRED: Greenville

(If more than one county is specified, please list the county where first offense occurred)

IS THERE A PREVIOUS PROCEEDING: YES NO

If yes, please indicate: COMPLAINT(Case No: _____)

SEARCH WARRANT(Case No: _____)

WIRE TAP(Case No: _____)

IS THERE A RELATED CASE/MATTER? YES NO

If yes, please indicate related matter:

IS THIS A SEALED INDICTMENT: YES NO

IS THIS A SUPERSEDING INDICTMENT: YES NO

If yes, reason for superseding:

If DUI, PLEASE CHECK OFFENSE 2ND 3RD

DEFENSE COUNSEL/ADDRESS:

AUSA HANDLING CASE: Michael P. McCarthy

PHONE NO:



TYPE OF SERVICE: (Please indicate service. Complete back side of form for bench warrant).

BENCH WARRANT: WRIT: SUMMONS: NOTICE:

SPECIAL INSTRUCTIONS/REMARKS TO THE CLERK:

INTERPRETER NEEDED: YES NO

LANGUAGE: _____ DIALECT: _____

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY

DEFENDANT'S NAME: Antonio Lamazo Jones

ALIAS(ES):

LAST KNOWN ADDRESS:



LAST KNOWN EMPLOYMENT:



PLACE OF BIRTH:



DATE OF BIRTH:



SOCIAL SECURITY NUMBER:

HEIGHT:



WEIGHT:



SEX:



RACE:



HAIR:



EYES:



SCARS, TATTOOS, OTHER DISTINGUISHING MARKS:

FBI NUMBER:

COMPLETE DESCRIPTION OF AUTO:

INVESTIGATIVE AGENCY AND ADDRESS:

Federal Bureau of Investigation / Washington Field Office, 9325
Discovery Blvd, Manassas, Virginia 20109

AO 83 (Rev. 08/11) Summons in a Criminal Case (USDC Version)

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America)

v.)

Case No. 6:18cr1113

ANTONIO LAMAZO JONES)

Defendant)

SUMMONS IN A CRIMINAL CASE

YOU ARE SUMMONED to appear before the United States district court at the time, date, and place set forth below to answer to one or more offenses or violations based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of Court

Place: Clement F. Haynsworth Federal Building
 300 East Washington Street
 Greenville, SC 29601

Courtroom No.: 4

Date and Time: 01/22/2019 10:00 am

This offense is briefly described as follows:

- Title 18, United States Code, Section 371
- Title 18, United States Code, Section 1343
- Title 18, United States Code, Section 1001

Date: 12/12/2018



s/Amanda Williams
Deputy Clerk

Issuing officer's signature

ROBIN BLUME, CLERK OF COURT

Printed name and title

RETURN OF SERVICE

I declare under penalty of perjury that I have:

- Executed and returned this summons
- Certified Mailed
- Signed Receipt Date
- Signed by

- Returned this summons unexecuted
- Certified Mailed
- No Response
- Defendant Appeared Defendant Failed to Appear

Date: _____

Server's signature

Printed name and title