

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

|                                 |          |   |
|---------------------------------|----------|---|
| <b>UNITED STATES OF AMERICA</b> | <b>:</b> | <b>CRIMINAL NO.</b>   |
| <b>v.</b>                       | <b>:</b> | <b>DATE FILED:</b>  |
| <b>C. M. JONES, INC.</b>        | <b>:</b> | <b>VIOLATION:</b>   |
|                                 | <b>:</b> | <b>18 U.S.C. § 371 (conspiracy to make<br/>a false statement in immigration<br/>matter – 1 count)</b> |

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Defendant C. M. JONES, INC. was a commercial landscaping business located in Chester County, Pennsylvania.
2. From on or about December 7, 2009 through on or about March 31, 2010, in the Eastern District of Pennsylvania, defendant

**C. M. JONES, INC.**

knowingly and intentionally conspired with others known to the United States Attorney to make under oath a false statement with respect to a material fact in a document required by the immigration laws and regulations prescribed thereunder, that is, an I-129 Petition for a Nonimmigrant Worker, in violation of Title 18, United States Code, Section 1546(a).

3. It was part of the conspiracy that, for the benefit of defendant C. M. JONES,

INC., “HES” submitted an I-129 Petition, which falsely stated that “HES” had a temporary need to use “JT” as a seasonal worker when, in fact, “HES” had no need and never used “JT” to perform any such work.

OVERT ACTS

In furtherance of the conspiracy, defendant C. M. JONES, INC., and others known and unknown to the United States Attorney, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. From in or about early December 2009 to in or about March 2010, defendant C. M. JONES, INC. told “JT” to see “HES” about obtaining a temporary work visa from December 2009 to March 2010 for “JT” to perform winter landscape services.
2. On or about December 7, 2009, for the benefit of defendant C. M. JONES, INC., “HES” submitted an I-129 Petition, which fraudulently claimed that “JT” was needed as a temporary worker to perform winter landscape services for “HES.”
3. From in or about December 2009 through in or about early March 2010, contrary to the false representation made in the I-129 petition, “JT” worked for and was paid in various false names by defendant C. M. JONES, INC.

All in violation of Title 18, United States Code, Section 371.

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ZANE DAVID MEMEGER  
United States Attorney