

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
14-80217-CR-RYSKAMP/HOPKINS
Case No. _____
18 U.S.C. § 1343

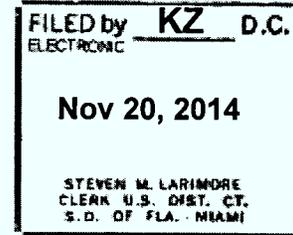
UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES D. PERRON,

Defendant.



INDICTMENT

The Grand Jury charges that:

COUNTS ONE - THREE
WIRE FRAUD
(18.S.C. §1343)

1. Beginning at least as early as October 17, 2014, and continuing through on or about October 26, 2014, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

JAMES D. PERRON,

did knowingly, and with intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made and, for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communication in interstate and

foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE SCHEME AND ARTIFICE TO DEFRAUD

2. It was the purpose of the scheme and artifice to defraud for the defendant to fraudulently obtain money from John Goodman, a defendant in a high profile criminal case pending in the Fifteenth Judicial Circuit of Florida in and for Palm Beach County at case number 50-20140-CF-005829-AXXX-MB, by falsely claiming that he could fix the outcome of the trial.

MANNER AND MEANS

3. The manner and means by which the defendant sought to accomplish the object and purpose of the scheme and artifice included, among other things, the following:

a. During the state trial of John Goodman, the defendant sent a series of text messages to K.K., a defense witness in that trial and a close friend of John Goodman. The messages were sent from the defendant's Trac cellular telephone from in or around Clarendon, Vermont, to K.K.'S cellular telephone in Palm Beach County, Florida.

b. In his initial text messages, the defendant asked K.K. to relay a "private message" to "John" that he had a family member who could help Goodman. One text message stated: "I don't think I need to explain, I just need to know if he needs the help."

c. When a sergeant with the Palm Beach County Sheriff's Office (PBSO), posing as K.K., responded to the defendant's texts, the defendant falsely claimed that he had a relative on the Goodman jury who could obtain a hung jury or possibly an acquittal, if Goodman was willing to pay a price. Specifically, the defendant demanded, in a text message, \$500,000 up front, followed by an additional \$500,000 if his relative successfully obtained a hung jury or an additional \$1 million if his relative obtained an acquittal.

d. When the PBSO sergeant, posing as K.K., asked the defendant via text message what guarantee there was for an acquittal, the defendant falsely responded via text "cannot guarantee acquittal . . . but can try persuade otherr [sic]. If not will hang jury."

e. When the defendant learned from the PBSO sergeant, posing as K.K., that "John" was interested in the deal, in a text message the defendant directed K.K. to bring the initial \$500,000 payment to a hotel in Albany, New York.

f. On October 26, 2014, the defendant was at a hotel in Albany, New York, and exchanged a number of texts with the PBSO sergeant posing as K.K. to confirm the meeting location. While the defendant was waiting in the hotel to collect the \$500,000 from K.K., he was arrested by PBSO agents. At no time during his exchange of text messages with K.K.'s phone did the defendant have the ability to influence the jury's verdict in any way.

USE OF THE WIRES

4. On or about the dates and times specified as to each Count below, in the Southern District of Florida and elsewhere, the defendant, for the purpose of executing the scheme and artifice to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds as set forth in each Count below:

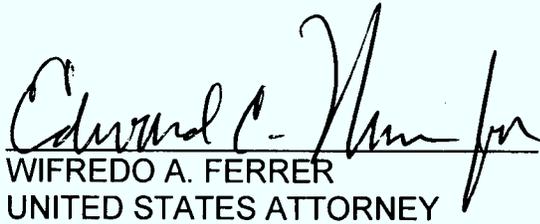
COUNT	DATE	DESCRIPTION OF WIRE COMMUNICATION
1	October 21, 2014 at 8:19 pm	Text message from Trac cellular telephone utilizing phone number (813) 505-5977, located in or around Clarendon, Vermont to cellular telephone number (561) 644-1742 located in Palm Beach County, Florida.
2	October 23, 2014 at 8:14 pm	Text message from Trac cellular telephone utilizing phone number (813) 505-5977, located in or around Clarendon, Vermont to cellular telephone number (561) 644-1742 located in Palm Beach County, Florida.

COUNT	DATE	DESCRIPTION OF WIRE COMMUNICATION
3	October 24, 2014 at 7:52 am	Text message from Trac cellular telephone utilizing phone number (813) 505-5977, located in or around Clarendon, Vermont to cellular telephone number (561) 644-1742 located in Palm Beach County, Florida.

All in violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL

FOREPERSON


WIFREDO A. FERRER
UNITED STATES ATTORNEY


ELLEN L. COHEN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. 14-80217-CR-RYSKAMP/

vs.

CERTIFICATE OF TRIAL ATTORNEY* HOPKINS

JAMES D. PERRON,
Defendant.

Superseding Case Information:

Court Division: (Select One)

Miami Key West
FTL WPB FTP

New Defendant(s) YES NO
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

- 1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- 2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
List language and/or dialect _____

4. This case will take 3-4 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)		(Check only one)
I 0 to 5 days	<u>X</u>	Petty _____
II 6 to 10 days	_____	Minor _____
III 11 to 20 days	_____	Misdem. _____
IV 21 to 60 days	_____	Felony <u>X</u>
V 61 days and over	_____	

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes: Judge: _____ Case No. _____
(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) Yes _____

If yes: Magistrate Case No. 14-8484-DLB

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of 11/07/2014

Defendant(s) in state custody as of _____

Rule 20 from the _____

District of _____

Is this a potential death penalty case? (Yes or No) Yes No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes No


ELLEN L. COHEN
ASSISTANT UNITED STATES ATTORNEY
Florida Bar/Court No. 0739472

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JAMES D. PERRON

Case No: 14-80217-CR-RYSKAMP/HOPKINS

Counts 1-3:

Wire Fraud

Title 18, United States Code, Section 1343

***Max. Penalty:** Up to 20 Years' Imprisonment; \$250,000.00 Fine
3 Years' Supervised Release

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**