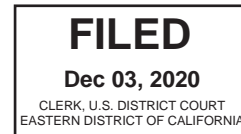


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5 Attorneys for Plaintiff
6 United States of America

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

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 JONAS JARUT,
14 Defendant.

CASE NO. 2:20-cr-0223 KJM
18 U.S.C. § 371 – Conspiracy to Transport Stolen
Property Interstate

15
16 I N F O R M A T I O N

17 The United States Attorney charges:

18 JONAS JARUT,
19 defendant herein, as follows:

20 I N T R O D U C T I O N

21 At all relevant times,

22 1. JONAS JARUT lived in Emeryville, California, and was a data administrator in
23 University 1's Graduate School of Education. In that position, JONAS JARUT's duties included
24 purchasing Apple MacBooks for University 1's Graduate School of Education faculty and staff.

25 2. Co-conspirator 1 lived in Folsom, California.

26 3. University 1 was a public university located in Berkeley, California.
27
28

1 THE CONSPIRACY

2 4. From in or about March 2019, and continuing through on or about June 29, 2020, in the
3 State and Eastern District of California and elsewhere, JONAS JARUT and Co-conspirator 1 knowingly
4 and willfully combined, conspired, confederated, and agreed with each other and others known and
5 unknown to the United States to commit certain offenses against the United States, that is, to transport,
6 transmit, and transfer in interstate and foreign commerce goods, wares, and merchandise having a value
7 of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud, in violation of
8 Title 18, United States Code, Section 2314.

9 MANNER AND MEANS

10 The manner and means by which JONAS JARUT, Co-conspirator 1, and others sought to
11 accomplish the objects of the conspiracy included, among others, the following:

12 5. Through his position at University 1, JONAS JARUT purchased Apple MacBooks that
13 he falsely represented were for use by University 1 faculty and staff when, in fact, he purchased the
14 Apple MacBooks to steal and sell to others, including Co-conspirator 1.

15 6. To purchase the Apple MacBooks, JONAS JARUT either ordered them through an
16 online portal or used his University 1-issued credit card. After the Apple MacBooks arrived at
17 University 1, JONAS JARUT stole them.

18 7. After JONAS JARUT stole the Apple MacBooks from University 1, he contacted Co-
19 conspirator 1 and offered to sell them to Co-conspirator 1. At times, Co-conspirator 1 contacted JONAS
20 JARUT and asked him if he had Apple MacBooks to sell.

21 8. When JONAS JARUT contacted Co-conspirator 1 and offered to sell Co-conspirator 1
22 stolen Apple MacBooks, at times, he provided Co-conspirator 1 with the specifications of the Apple
23 MacBooks. When Co-conspirator 1 contacted JONAS JARUT and asked him if he had Apple
24 MacBooks to sell, at times, Co-conspirator 1 provided JONAS JARUT with the specifications of Apple
25 MacBooks he wanted to purchase.

26 9. When communicating about the stolen Apple MacBooks, JONAS JARUT and Co-
27 conspirator 1 discussed and agreed on the prices JONAS JARUT was willing to accept and Co-
28 conspirator 1 was willing pay for the stolen Apple MacBooks, which Co-conspirator 1 would resell to

1 other buyers. The prices Co-conspirator 1 offered and agreed to pay for the stolen Apple MacBooks
2 were based on the prices at which Co-conspirator 1 could sell the Apple MacBooks to other buyers.

3 10. After purchasing the stolen Apple MacBooks from JONAS JARUT, Co-conspirator 1
4 resold and sent them to other buyers. Co-conspirator 1 often shipped the stolen Apple MacBooks from
5 Folsom, California, to buyers located outside the State of California.

6 11. In total, JONAS JARUT sold Co-conspirator 1 at least approximately 90 Apple
7 MacBooks he stole from University 1. The cost to University 1 of those Apple MacBooks was over
8 approximately \$209,000.

9 OVERT ACTS

10 In furtherance of the conspiracy, and to accomplish its objects and purposes, at least one of the
11 conspirators committed, or caused to be committed, in the Eastern District of California and elsewhere,
12 the following overt acts, among others:

13 12. On or about July 21, 2019, JONAS JARUT sent a text message to Co-conspirator 1
14 offering to sell Co-conspirator 1 two Apple MacBooks.

15 13. On or about July 21, 2019, Co-conspirator 1 sent JONAS JARUT a text message saying
16 he would purchase two Apple MacBooks for \$1,875 apiece.

17 14. On or about September 5, 2019, JONAS JARUT sent a text message to Co-conspirator 1
18 offering to sell Co-conspirator 1 two Apple MacBooks.

19 15. On or about September 5, 2019, Co-conspirator 1 sent JONAS JARUT a text message
20 saying he would purchase two Apple MacBooks for \$1,825 apiece.

21 16. On or about September 26, 2019, JONAS JARUT sent a text message to Co-conspirator 1
22 offering to sell Co-conspirator 1 two Apple MacBooks.

23 17. On or about September 26, 2019, Co-conspirator 1 sent JONAS JARUT a text message
24 saying he would purchase two Apple MacBooks for \$1,810 apiece.

25 //

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1 18. On or about March 31, 2020, Co-conspirator 1 sent JONAS JARUT a text message
2 asking if JONAS JARUS had an Apple MacBook to sell.

3 All in violation of Title 18, United States Code, Section 371.
4

5 Dated: 12/3/2020

MCGREGOR W. SCOTT
United States Attorney



7 By: _____

8 MATTHEW THUESEN
Assistant United States Attorney
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United States v. Jarut
Penalties for Information

Defendant
JONAS JARUT

COUNT 1:

VIOLATION: 18 U.S.C. § 371 – Conspiracy to transport stolen property interstate

PENALTIES: Up to 5 years of imprisonment, or fine up to \$250,000, or both;
Up to 3 years of supervised release;
Restitution

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