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EAST DISTRICT OF LA
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR STRUCTURING
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

15-193

v.

*

SECTION:

SECT. G MAG 4

JERRY WAYNE COX

*

VIOLETIONS: 31 U.S.C. § 5324(a)(3)

31 U.S.C. § 5324(d)(2)

*

18 U.S.C. § 2

* * *

The United States Attorney charges that:

COUNT 1

(31 U.S.C. § 5324(a)(3) – Structuring – Domestic Financial Institutions)

On or about the dates set forth below, in the Eastern District of Louisiana, the defendant, **JERRY WAYNE COX**, did knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structure and assist in structuring, the following transactions with a domestic financial institution, as part of a pattern of illegal activity involving more than \$100,000 in a twelve (12)-month-period:

Date(s)	Transaction	Total Amount
Deposit 09/20/2011	Ck# 1553 i/a/o \$70,000 deposited into Citizens Savings Bank acct	\$70,000
Withdrawal 09/20/2011	\$9,000 cash withdrawal from Citizens Savings Bank acct	\$9,000
Deposit 09/22/2011	Ck# 2875 i/a/o \$61,500 deposited into Resource account from Citizens Savings Bank acct	\$61,500
Withdrawal 09/24/2011 09/27/2011 09/27/2011 09/30/2011 10/04/2011 10/11/2011	Ck# 1777 i/a/o \$7,650 from Resource account made to cash Ck# [blank] i/a/o \$9,500 from Resource account made to cash Ck# 1784 i/a/o \$9,000 from Resource account made to cash Ck# 1785 i/a/o \$9,000 from Resource account made to cash \$9,000 cash withdrawal from Resource account \$9,000 cash withdrawal from Resource account	\$53,150

All in violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d)(2); Title 31, Code of Federal Regulations, Sections 1010.100(t), 1010.11, and 1010.313; and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 31, United States Code, Sections 5324 and 5317(c)(1).

2. As a result of the offense alleged in Count 1, defendant, **JERRY WAYNE COX**, shall forfeit to the United States all property, real or personal, involved in the offenses, and any property traceable thereto, including, but not limited to:

- a. At least \$102,050 in United States Currency and all interest and proceeds traceable thereto.

- b. The Government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.


3. If any of the above property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 31, United States Code, Section 5317(c)(1)(B), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 31, United States Code, Sections 5324 and 5317(c)(1).

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



JORDAN GINSBERG
Assistant United States Attorney
Illinois Bar No. 6282956

New Orleans, Louisiana
August 6, 2015