

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No.
 :
 JONATHAN J. LEDESMA : 18 U.S.C. § 1001(a)(2)
 : 18 U.S.C. § 701

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT 1

False Statements

1. At all times relevant to this Information:

a. Defendant JONATHAN LEDESMA (“LEDESMA”) was a resident of Middlesex County, New Jersey and employed as a United States Air Marshal. LEDESMA was also a registered member/manager for an auto repair limited liability company (the “Ledesma Company”) that operated out of LEDESMA’s residence in Middlesex County, New Jersey (the “Ledesma Residence”). LEDESMA was not licensed or permitted to sell items that were embossed with the insignia of the United States Department of Homeland Security (“DHS”).

b. The Federal Air Marshal Service was under the supervision of the Transportation Security Administration of DHS.

c. Individual-1 and Individual-2 were residents of New York.

d. Company-1 was a company in Nutley, New Jersey that sold, among other items, cards to law enforcement officers that the officers could provide

to their friends and family (the “Cards”). The purpose of the Cards was to identify their bearers as having a relationship with members of law enforcement. These cards were embossed with the name of the law enforcement officer’s agency, and related insignia, and included a quick response, or “QR” code, that, when scanned by an imaging device, such as a cellular phone camera, would provide the cellular phone number associated with the law enforcement officer’s telephone. The cards included a description of the relationship between the law enforcement officer and the Card’s bearer, such as “family member.”

2. From in or about October 2021 through in or about January 2023, LEDESMA purchased over 200 Cards from Company-1. Each Card cost LEDESMA approximately \$19.21. LEDESMA then resold these Cards, at a substantial profit. The resale of these Cards is not authorized by any regulations made pursuant to law.

3. In or about July 2022, LEDESMA sold one of the Cards (“Card-1”) to Individual-1, in exchange for \$1,700. Prior to the sale, LEDESMA and Individual-1 communicated telephonically, with LEDESMA using his personal cellular telephone (“Ledesma Phone-1”). During these communications, LEDESMA instructed Individual-1 to electronically transmit to Ledesma Phone-1 a copy of Individual-1’s driver’s license.

4. On or about June 21, 2022, at LEDESMA’s direction, Individual-1 electronically submitted a payment of approximately \$1,700 for Card-1 to LEDESMA’s wife. Once LEDESMA received payment for Card-1, he and Individual-1 communicated telephonically to discuss delivery.

5. In or about early July 2022, while in Brooklyn, New York, one of LEDESMA's co-conspirators (the "Co-Conspirator") delivered Card-1 to Individual-1 on LEDESMA's behalf. Card-1 was embossed with Individual-1's name and the DHS insignia and identified Individual-1 as an "immediate family member" of "Jonathan J. Ledesma," who was further identified on Card-1 as "a federal officer with Homeland Security." However, LEDESMA and Individual-1 are not related and have never met. The Card was also embossed with a QR code.

6. Card-1 was placed inside a credential case (the "Wallet") that had the markings, "Law Enforcement Family Member." Individual-1 also received two parking placards and a shield that read, "Law Enforcement Family Member."

7. On or about January 30, 2023, while at an airport in the Eastern District of Kentucky ("Airport"), law enforcement arrested Individual-1 on suspicion of credit card fraud in connection with the reservation of a rental car. At the time of his arrest, Individual-1 possessed the Wallet, which held Card-1.

8. An officer with the United States Customs and Border Protection ("CBP") scanned the QR code embossed on Card-1, which led that officer to a cellular telephone number subscribed to LEDESMA ("Ledesma Phone-2"). The CBP officer called Ledesma Phone-2 and identified herself as a CBP officer. LEDESMA, who was in the District of New Jersey at the time of the call, identified himself by name and stated that he was a Federal Air Marshal. Explaining the reason for her call, the CBP officer told LEDESMA that CBP was investigating an incident involving Individual-1 who was detained at the Airport. LEDESMA asserted that, while he did not know Individual-1, he was a longtime friend of Individual-1's father, who resided in Israel.

LEDESMA explained that he and Individual-1's father had previously done business together and that LEDESMA provided Individual-1 with Card-1 as a favor to Individual-1's father.

9. LEDESMA's statements to the CBP officer were false because, as LEDESMA knew, LEDESMA had never met Individual-1's father and had never done any business with Individual-1's father.

10. On or about January 30, 2023, in the District of New Jersey, the Eastern District of Kentucky, and elsewhere, defendant

JONATHAN J. LEDESMA

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, namely, an investigation conducted by the United States Customs and Border Protection.

In violation of Title 18, United States Code Section 1001(a)(2).

COUNT 2
Sale of Official Insignia

11. Paragraph 1 of this Information is realleged and incorporated by reference as though fully set forth herein.

12. On or about January 18, 2023, LEDESMA sold one of the Cards (“Card-2”) to Individual-2, in exchange for \$1,100. Prior to the sale, LEDESMA and Individual-2 communicated telephonically, with LEDESMA using Ledesma Phone-1. During these communications, LEDESMA instructed Individual-2 to electronically transmit to Ledesma Phone-1 a copy of Individual-2’s driver’s license.

13. On or about December 17, 2022, at LEDESMA’s direction, Individual-2 electronically submitted a payment of approximately \$1,100 for Card-2 to LEDESMA via Zelle, which is a United States-based digital payment network. LEDESMA instructed Individual-2 to include the phrase, “transmission repair,” in the “memo” section of the Zelle transaction. There was, however, no transaction between Individual-2 and LEDESMA related to any transmission repair.

14. On or about January 18, 2023, at LEDESMA’s direction, Individual-2 traveled to Middlesex County, New Jersey to pick up Card-2. Via telephonic communications, LEDESMA directed Individual-2 to a location that is in close vicinity to the Ledesma Residence. Upon arriving at that location, Individual-2 met with a man who provided him with Card-2.

15. Card-2 was embossed with Individual-2’s name and the DHS insignia and identified Individual-2 as an “immediate family member” of “Jonathan J. Ledesma,” who was further identified on the Card as “a federal officer with Homeland

Security.” However, LEDESMA and Individual-2 are not related and have never met. Card-2 was also embossed with a QR code.


16. Card-2 was placed inside a credential case that had the markings, “Law Enforcement Family Member.” Individual-2 also received a shield that read, “Law Enforcement Family Member.”

17. On or about January 18, 2023, in the District of New Jersey, the Eastern District of New York, and elsewhere, defendant

JONATHAN J. LEDESMA

did knowingly sell insignia of the design prescribed by the head of a department or agency of the United States for use by any officer and employee thereof, and any colorable imitation thereof, namely, a United States Department of Homeland Security insignia, without authorization under regulations made pursuant to law.

18. In violation of Title 18, United States Code Section 701.


PHILIP R. SELLINGER
United States Attorney