

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

FILED  
U.S. DISTRICT COURT  
SAVANNAH DIV.  
2019 JAN 17 PM 2:50

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UNITED STATES OF AMERICA ) INFORMATION NO.  
 )  
v. )  
 ) 18 U.S.C. § 1343  
SAILOR JONES ) Wire Fraud

CR 19-080

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE  
*Wire Fraud*  
18 U.S.C. § 1343

1. From in or about December 2016 and continuing through in or about June 2017, in Chatham County and Liberty County, within the Southern District of Georgia, the defendant, **SAILOR JONES**, did knowingly devise and intend to devise a scheme and artifice to defraud M.M., and to obtain money and property of M.M. by means of materially false and fraudulent pretenses, representations, and promises.

**Background**

2. M.M. is an elderly resident of Chatham County, Georgia, suffering from dementia who has required medical assistance for several years. M.M. maintained financial accounts with BB&T Bank, Vanguard Group, and Discover Bank.

3. **SAILOR JONES** is a resident of Liberty County. At all times material to this Information, she owned and operated Private Duty Health Care (“PDHC”), a company purporting to provide at-home nursing services. PDHC is not licensed with the State of Georgia’s Department of Community Health as a private home care provider, nor is **SAILOR JONES** a licensed nurse.

4. Beginning in 2016, while M.M. lived at a retirement community in Savannah, Georgia, **SAILOR JONES** assisted M.M. with her laundry and other minor tasks. Due to her deteriorating health, in November 2016, M.M. was admitted to a skilled nursing facility in Savannah, Georgia, where she resided and received health care from trained staff. **SAILOR JONES** was not employed or otherwise affiliated with the skilled nursing facility where M.M. resided.

#### **Description of the Scheme**

5. Beginning in December 2016, **SAILOR JONES** obtained access to checks associated with M.M.'s BB&T checking account. By this time, M.M. was already suffering from dementia and lacked sufficient capacity to manage her finances or make financial decisions. On seven instances between December 19, 2016, and February 13, 2017, **SAILOR JONES** arranged for checks to be made payable to her or PDHC from M.M.'s checking account totaling approximately \$8,000 for "nursing services." During this period, M.M. received nursing services from the skilled nursing facility. **SAILOR JONES** deposited the checks into her personal accounts.

6. In March 2017, **SAILOR JONES** obtained access to M.M.'s financial accounts at Vanguard Group by, among other ways, impersonating M.M. in communications with Vanguard Group to inquire about M.M.'s account balances and to request additional checks.

7. On eleven instances between March 3, 2017, and June 5, 2017, **SAILOR JONES** arranged for checks to be made payable to her or PDHC from M.M.'s personal

financial accounts at Vanguard Group and Discover Bank for “nursing services” and “home health service 24 hrs care.” The checks totaled \$495,677.87. During this period, M.M. was a resident of a skilled nursing facility that provided M.M. with health care. **SAILOR JONES** deposited the Vanguard Bank and Discover Bank checks into her own personal accounts.

### **Execution of the Scheme**

8. On or about March 3, 2017, in the Southern District of Georgia and elsewhere, defendant **SAILOR JONES**, for the purpose of executing and attempting to execute the aforementioned scheme and artifice to defraud, and to obtain the money and property of M.M. by means of materially false and fraudulent pretenses and representations, did cause to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals, and sounds: that is, defendant **SAILOR JONES** placed a telephone call impersonating M.M. from the Southern District of Georgia to a representative of Vanguard Group in North Carolina.

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



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Bobby L. Christine  
United States Attorney

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Assistant United States Attorney  
\*Lead Counsel



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Brian T. Rafferty  
Assistant United States Attorney  
Chief, Criminal Division