

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

FILED

Jul 13 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,) CASE NO. 4:23-cr-00212-HSG
12 Plaintiff,)
13 v.) VIOLATIONS:
14 ANDREW JONES,) 18 U.S.C. § 2243(b) – Sexual Abuse of a Ward;
15 Defendant.) 18 U.S.C. § 1001 – False Statement to a Government
16) Agency
17) OAKLAND VENUE

18 INFORMATION

19 The United States Attorney charges:

20 Introductory Allegations

21 1. The Federal Correctional Institution, Dublin (“FCI Dublin”) was a federal prison in
22 Alameda County, California, within the Northern District of California.

23 2. The defendant ANDREW JONES (“JONES”) was employed at FCI Dublin as a
24 correctional officer.

25 3. C.V. was a female inmate at FCI Dublin, who was serving a prison sentence.

26 4. J.L. was a female inmate at FCI Dublin, who was serving a prison sentence.

27 5. R.C. was a female inmate at FCI Dublin, who was serving a prison sentence.

1 COUNT ONE: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

2 6. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
3 forth here.

4 7. On a date between on or about July 1, 2020 and on or about December 31, 2020, in the
5 Northern District of California, the defendant,

6 ANDREW JONES,

7 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with C.V., a person who was
8 in official detention and under the custodial, supervisory, and disciplinary authority of the defendant,
9 when he caused contact between his penis and C.V.’s mouth, while they were in a staff bathroom in the
10 FCI Dublin kitchen, in violation of 18 U.S.C. § 2243(b).

11 COUNT TWO: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

12 8. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
13 forth here.

14 9. On a date between on or about July 1, 2020 and on or about December 31, 2020, in the
15 Northern District of California, the defendant,

16 ANDREW JONES,

17 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with C.V., a person who was
18 in official detention and under the custodial, supervisory, and disciplinary authority of the defendant,
19 when he penetrated C.V.’s vulva with his penis, while they were in a staff bathroom in the FCI Dublin
20 kitchen, in violation of 18 U.S.C. § 2243(b).

21 COUNT THREE: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

22 10. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
23 forth here.

24 11. On a date between on or about July 1, 2020 and on or about December 31, 2020, in the
25 Northern District of California, the defendant,

26 ANDREW JONES,

27 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with C.V., a person who was
28 in official detention and under the custodial, supervisory, and disciplinary authority of the defendant,

1 when he penetrated C.V.'s vulva with his penis, while they were in the food service warehouse, in
2 violation of 18 U.S.C. § 2243(b).

3 COUNT FOUR: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

4 12. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
5 forth here.

6 13. On a date between on or about January 1, 2021 and on or about June 30, 2021, in the
7 Northern District of California, the defendant,

8 ANDREW JONES,

9 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with J.L., a person who was in
10 official detention and under the custodial, supervisory, and disciplinary authority of the defendant, when
11 he caused contact between his penis and J.L.'s mouth, while they were in a warehouse near the
12 FCI Dublin kitchen, in violation of 18 U.S.C. § 2243(b).

13 COUNT FIVE: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

14 14. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
15 forth here.

16 15. On a date between on or about March 1, 2021 and on or about June 30, 2021, in the
17 Northern District of California, the defendant,

18 ANDREW JONES,

19 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with R.C., a person who was
20 in official detention and under the custodial, supervisory, and disciplinary authority of the defendant,
21 when he penetrated R.C.'s vulva with his penis, while they were in a storage room in the officer's office
22 in the FCI Dublin kitchen, in violation of 18 U.S.C. § 2243(b).

23 COUNT SIX: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

24 16. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
25 forth here.

26 17. On a date between on or about March 1, 2021 and on or about June 30, 2021, in the
27 Northern District of California, the defendant,

1 ANDREW JONES,

2 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with R.C., a person who was
3 in official detention and under the custodial, supervisory, and disciplinary authority of the Defendant,
4 when he penetrated R.C.'s vulva with his penis, while they were in a bathroom near the FCI Dublin
5 kitchen, in violation of 18 U.S.C. § 2243(b).

6 COUNT SEVEN: (18 U.S.C. § 1001(a)(2) – False Statement to Government Agency)

7 18. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
8 forth here.

9 19. On or about March 11, 2022, in the Northern District of California, the defendant,

10 ANDREW JONES,

11 did willfully and knowingly make materially false, fictitious, and fraudulent statements and
12 representations in a matter within the jurisdiction of the executive branch of the Government of the
13 United States, by stating that he had never had sexual intercourse with C.V. These statements and
14 representations were false because, as JONES then and there knew, he had engaged in sexual intercourse
15 with C.V.

16 It is further alleged that this offense involved offenses under Chapter 109A.

17 All in violation of Title 18, United States Code, Section 1001(a)(2).

18
19 DATED: July 13, 2023

ISMAIL J. RAMSEY
United States Attorney

21 /s/ Andrew Paulson
22 ANDREW PAULSON
23 MOLLY K. PRIEDEMAN
24 Assistant United States Attorneys
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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 2243(b) – Sexual Abuse of a Ward;
18 U.S.C. § 1001 – False Statement to a Government Agency

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: SEE ATTACHMENT TO PENALTY SHEET

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DEFENDANT - U.S.

▶ ANDREW JONES

DISTRICT COURT NUMBER
4:23-cr-00212-HSG

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DOJ/OIG and FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form ISMAIL J. RAMSEY

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) ANDREW PAULSON, AUSA

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges ▶
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST ▶ Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ Month/Day/Year

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OAKLAND

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

ATTACHMENT TO PENALTY SHEET - ANDREW JONES

MAXIMUM PENALTIES:

Counts 1-6 (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

- 15 years' imprisonment
- \$250,000 fine
- Maximum Supervised Release: Life; Minimum Supervised Release: 5 years
- Restitution
- \$5,100 special assessment

Count 7 (18 U.S.C. § 1001(a)(2) – False Statements to a Government Agency)

- 8 years imprisonment
- \$250,000 fine
- Restitution
- 3 years supervised release

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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OAKLAND

CRIMINAL COVER SHEET

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. ANDREW JONES

CASE NUMBER:

CR 4:23-cr-00212-HSG

Is This Case Under Seal?

Yes No

Total Number of Defendants:

1 2-7 8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes No

Venue (Per Crim. L.R. 18-1):

SF OAK SJ

Is this a potential high-cost case?

Yes No

Is any defendant charged with a death-penalty-eligible crime?

Yes No

Is this a RICO Act gang case?

Yes No

Assigned AUSA

(Lead Attorney): ANDREW PAULSON

Date Submitted: 7-13-2023

Comments: