

CLERK OF DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ORIGINAL

DEPUTY CLERK *LM*

UNITED STATES OF AMERICA

NO.

v.

CRAIG ALLEN OTTESON (01)
JAY BRUCE HEIMBURGER (02)
CHRISTOPHER ARNOLD JIONGO (03)

3-16 CR -406 -N

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Commit Wire Fraud
Violations of 18 U.S.C. § 1349 (18 U.S.C. § 1343)

At all times material to the indictment:

Introduction

1. On or about June 14, 2010, Stonebridge Advisors, LLC (Stonebridge) was established as a Texas limited liability partnership conducting business at 6029 Belt Line Road, Suite 11, Dallas, Texas 75254, in the Dallas Division of the Northern District of Texas. Stonebridge was involved as the Managing Partner of Worldwide Diamond Ventures, L.P. (Worldwide Diamond). Defendant **Craig Allen Otteson** acted as the Managing Member and Chief Compliance Officer of Stonebridge. Defendant **Jay Bruce Heimburger** acted as a Principal Partner of Stonebridge. Stonebridge also acted as the General Partner of Worldwide Diamond.

2. On or about January 11, 2008, JBH Securities, Inc. (JBH) was established as a corporation in Texas conducting business at 1507 San Rafael, Dallas, Texas 75218 in the Dallas Division of the Northern District of Texas. JBH was primarily involved in the business of providing investment advice. In the JBH incorporation documents, defendant **Heimbürger** was listed as the registered agent and director of JBH.

3. On or about June 22, 2010, Worldwide Diamond Ventures, L.P. (Worldwide Diamond) was initially established as a Texas limited liability partnership conducting business at 6029 Belt Line Road, Suite 11, Dallas, Texas 75254 in the Dallas Division of the Northern District of Texas. Worldwide Diamond was primarily involved in the business of buying and reselling diamonds on the international market. Defendant **Otteson** also acted as the Managing General Partner of Worldwide Diamond. As the Managing General Partner of Worldwide Diamond, **Otteson** (through Stonebridge) had control over Worldwide Diamond funds.

4. On or about June 23, 2010, Worldwide Diamond signed an “Amended and Restated Agreement of Limited Partnership”.

5. On or about February 18, 2011, Worldwide Diamond entered into an “agent agreement” with American Safe Retirements (ASR) to act as agents of Worldwide Diamond to solicit outside investors to purchase “Non-Recourse Promissory Notes” (diamond notes) in the amount of \$50,000 per note.

6. On or about February 28, 2011, Worldwide Diamond entered into an “agent agreement” with Penumbra Solutions, LLC (Penumbra) to act as agents of Worldwide

Diamond to solicit outside investors to purchase these diamond notes.

7. On or about December 24, 2009, Global Reach Industries, Inc. (Global Reach) was established as a domestic corporation in Nevada, conducting business at 8883 West Flamingo Road, Suite 102, Las Vegas, Nevada. On or about August 22, 2011, Global Reach was registered in the Bahamas as Global Reach Industries Limited. Global Reach was engaged in the investment business. Defendant **Jiongo** is listed as the officer of Global Reach in the formation documents in both Nevada and the Bahamas.

8. On or about October 1, 2013, Worldwide Diamond filed for bankruptcy in the Northern District of Texas in Case Number 13-35115.

The Conspiracy and its Objects

9. Beginning in or about March 2011, the exact date being unknown to the Grand Jury, and continuing thereafter until at least in or about November 2013, in the Dallas Division of the Northern District of Texas and elsewhere, defendants **Craig Allen Otteson, Jay Bruce Heimburger and Christopher Arnold Jiongo**, did unlawfully, knowingly, and willfully conspire and agree together, with each other, and with persons both known and unknown to the Grand Jury, to commit an offense against the United States, namely, the offense of wire fraud, in violation of 18 U.S.C. § 1343.

Manner and Means of the Conspiracy

10. It was part of the conspiracy that:

a) During the period from in or about June 2010 through in or about March 2011, conspirators initially attempted to raise funds for their new business

of purchasing and reselling diamonds by offering the sale of additional limited partnerships in Worldwide Diamond. Worldwide Diamond limited partnerships were offered in the minimum amount of \$100,000. However, conspirators were unable to raise sufficient capital funds through the sale of additional partnerships;

b) Beginning in about March 2011, conspirators attempted to raise additional needed start-up funds by offering for sale to new investors "Non-Recourse Promissory Notes" (the diamond notes). Conspirators hired three outside companies to market and sell diamond notes to investors in Texas, Pennsylvania and California. **Jiongo** drafted the diamond notes. Each \$50,000 diamond note had a nine-month maturity date and an 8% rate of return;

c) Although conspirators initially raised over \$5 million from new investors during the period from approximately March through June 2011, conspirators changed the business plan originally promised to investors. In the original business plan, conspirators promised that all invested funds would be used to purchase and resell diamonds. However, conspirators were unable to purchase and resell diamonds on the market as planned. In approximately June 2011, conspirators concealed that investor funds were not being used to purchase and resell diamonds;

d) Although the conspirators were unable to purchase and resale diamonds as promised to investors, they continued to falsely represent to all investors that the diamond notes were fully secured by diamond inventory and

cash. Since the diamond notes were no longer fully secured, conspirators failed and refused to offer each investor the right to request a refund of all or at least part of the funds invested in diamond notes;

e) When each diamond note matured after nine months, conspirators deceived investors by encouraging them to renew their diamond notes, even though the conspirators knew that Worldwide Diamond no longer had sufficient diamond inventory and cash to fully secure each diamond note;

f) During the approximate period from April 2011 through February 2013, conspirators paid monthly interest payments to investors as promised in the note. When selling the diamond notes, conspirators (through their sales agents) represented to every investor that profits from ongoing purchase and resale of diamonds would be used to make monthly investor interest payments. However, conspirators fraudulently concealed from investors that the true source of funds used to pay interest payments were funds conspirators received from other investors. During the approximate period from about April 2011 to February 2013, conspirators used these “lulling payments” to continue their scheme to defraud investors and avoid investor detection of this fraudulent scheme;

g) During the approximate period from about March through May 2013, conspirators continued to defraud investors by concealing from investors that conspirators planned to use and loan investor funds for many different purposes unrelated to the purpose and resale of diamonds. Conspirators knew

that the investors did not give their consent to use investment funds for any of these unauthorized purposes;

h) Conspirators fraudulently concealed from investors that during the period from March 2011 to July 2011, conspirators made several unauthorized loans of investor funds totaling \$1,447,300 to a third party in connection with a promised future purchase of gold and diamonds. No gold and diamonds were delivered by the third party. These unauthorized loans to a third party were concealed from investors, since the conspirators knew that investors would never agree to the use of investor funds for such a speculative venture;

i) Conspirators fraudulently concealed from investors that on or about August 11, 2011, defendant **Otteson** (on behalf of Worldwide Diamond) signed a promissory note agreeing to loan \$1,000,000 of investor funds to Global Reach Industries, Ltd. (Global Reach) for one year. Defendant **Jiongo** proposed this \$1,000,000 investment in a start-up insurance company. Conspirators concealed this unauthorized use of investment funds from investors, knowing that conspirators had promised investors that all investment funds would only be used to purchase and resell diamonds;

j) Conspirators fraudulently concealed from investors that on or about June 22, 2011, defendant **Otteson** (on behalf of Worldwide Diamond) represented to the Texas State Securities Board (TSSB) that Worldwide Diamond would “promptly commence the repayment of all notes currently outstanding and will

repay such notes in full prior to their respective maturity dates”;

k) Conspirators thereafter fraudulently concealed from investors that **Otteson** promised the TSSB that conspirators would promptly repay investors in full for all outstanding diamond notes;

l) During the period from about August 2011 through May 2013, conspirators **Otteson, Heimbürger** and **Jiongo** continued to deceive investors by sending out renewal letters which falsely represented to investors that Worldwide Diamond was successfully acquiring new diamond inventory;

m) During the period from March through November 2011, conspirators **Otteson, Heimbürger** and **Jiongo** defrauded the first round of investors when they fraudulently concealed material information from these investors, including how the conspirators used investor funds and other information, which caused 57 investors to invest a total of \$5,141,699 with Worldwide Diamond Ventures;

n) During the period from February 2012 through May 2013, conspirators **Otteson** and **Heimbürger** defrauded the second round of investors when they fraudulently concealed material information from investors, including how the conspirators used investor funds and other information, which caused 20 new investors to invest a total of \$1,330,000 with Worldwide Diamond Ventures; and

o) During the period from March 2011 through May 2013, conspirators collected a total of approximately \$6,471,699 from 77 investors. As a result of

this investor fraud scheme, these investors sustained a total loss of at least \$4,922,811.

Acts in Furtherance of the Conspiracy

11. In furtherance of the conspiracy and to affect the objects thereof, one or more of the conspirators named in Count One of this Indictment committed the following acts, among others, in the Northern District of Texas and elsewhere:

a) On or about March 10, 2011, Worldwide Diamond (through **Otteson**) loaned \$40,000 of investor funds to a third party business associate.

This loan was repaid in April of 2011;

b) On or about March 25, 2011, Worldwide Diamond (through **Otteson**) loaned \$70,000 of investor funds to a third party business associate.

This loan was repaid in July of 2011;

c) On or about April 18, 2011, Worldwide Diamond (through **Otteson**) loaned \$200,000 of investor funds to an individual purportedly for the purchase of diamonds. This loan (like the auto loans) was made with investor funds without the knowledge or consent of Worldwide Diamond investors. This \$200,000 loan

was due for repayment on June 20, 2011. \$100,000 was paid June 22, 2011.

This remaining balance of the loan was never repaid;

d) On or about April 29, 2011, Worldwide Diamond (through **Heimbarger**) sent a letter to Worldwide Diamond sales agents that funds generated by the sale of non-recourse promissory notes (diamond notes) had

surpassed the size of the diamond inventory and that the sale of more notes must be halted until more diamonds could be purchased as security for the notes. In this letter, conspirators concealed from both the Worldwide Diamond sales agents and investors that Worldwide Diamond no longer had sufficient diamond inventory and cash to secure all investor notes;

e) On or about May 13, 2011, Worldwide Diamond (through **Otteson**) entered into agreements to make a loan to a third party. Conspirators knew that the cash used for these loans would be investor funds. These loans were supposedly secured by promises of shipments of gold dust from Ghana, Africa;

f) On or about May 18, 2011, Worldwide Diamond (through **Otteson**) entered into another agreement to loan \$1,000,000 of investor funds to a third party. Conspirators knew that the cash used for these loans would be investor funds. These loans were supposedly secured by promises of shipments of gold dust and from Ghana, Africa;

g) On or about June 6, 2011, Worldwide Diamond (through **Otteson**) entered into agreements to make a loan to a third party. Conspirators knew that the cash used for these loans would be investor funds. These loans were supposedly secured by promises of shipments of gold dust from Ghana, Africa;

h) On or about June 20, 2011, Worldwide Diamond (through **Otteson**) entered into another agreement to loan \$1,000,000 of investor funds to a third party. Conspirators knew that the cash used for these loans would be investor

funds. These loans were supposedly secured by promises of shipments of gold dust from Ghana, Africa;

i) During the period from in or about March through July 2011, conspirators sent a total of approximately \$1,447,300 to a third party in the United States and also to companies in Ghana, Africa in connection with the possible purchase of gold dust and diamonds, but no gold or diamonds were ever shipped to Worldwide Diamond. Conspirators knew that investor funds were used for all of these loans and that investors never agreed to use investor funds to make these unauthorized loans. Conspirators fraudulently concealed from Worldwide Diamond investors that investor funds were used in this manner;

j) On or about July 27, 2011, Worldwide Diamond (through **Otteson**) wire transferred \$1,000,000 to Global Outreach Industries, Ltd. (Global Outreach) as a loan to finance the start-up of a new insurance company. Defendant **Jiongo** was the President of Global Outreach. During the period July through August of 2011, defendant **Jiongo** disbursed the proceeds of this \$1,000,000 loan. **Jiongo** disbursed \$600,000 of investor funds into his own bank account and \$400,000 of investor funds into the accounts of third parties. Conspirators knew that investor funds were used to finance this \$1,000,000 loan and that investors never agreed to use investor funds to make this unauthorized loan. Conspirators fraudulently concealed from Worldwide Diamond investors that investor funds were used in this manner;

k) On or about January 1, 2012, Worldwide Diamond (through **Otteson**) entered into a service agreement with a person in California (F.H.), an individual known to the grand jury, to act as a Worldwide Diamonds consultant for the purpose of selling non-recourse promissory notes (diamond notes) to clients from the Chinese-American community in California;

l) During this period, conspirators caused Worldwide Diamond sales agent F.H. to represent to potential new investors that Worldwide Diamond had sufficient diamond inventory or cash to fully secure any promissory notes.

However, conspirators knew that this representation to investors was false and that Worldwide Diamond did not have cash or diamonds to secure these notes;

m) During the period from about February through November 2012, Worldwide Diamond sales agent F.H. sold approximately \$1,147,868 of new promissory notes to 20 new investors in California; and

n) During the period from about March 2011 through May 2013, conspirators fraudulently used investor funds in the amount of \$655,000 to make “lulling” interest payments to other investors via United States mail.

The Grand Jury hereby realleges and incorporates, by reference herein, all of the allegations set forth in Counts Two through Ten of this indictment, as additional acts in furtherance of this conspiracy.

In violation of 18 U.S.C. § 1349 (18 U.S.C. § 1343).

Counts Two through Four
Wire Fraud and Aiding and Abetting
(Violations of 18 U.S.C. §§ 1343 and 2)

1. The Grand Jury hereby adopts, realleges and incorporates by reference herein the allegations contained in the Introduction and in Count One of this Indictment as if fully set forth herein.

Scheme to Defraud Investors

2. During the period from in or about March through November 2011, defendants **Craig Allen Otteson, Jay Bruce Heimburger, and Christopher Arnold Jiongo**, aided and abetted by each other and others both known and unknown to the Grand Jury, knowingly and with intent to defraud, devised and intended to devise a scheme to defraud investors, and to obtain money and property from these investors by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means

3. It was a part of the scheme and artifice to defraud that defendants falsely represented to investors that all investment funds would be used to buy and resell diamonds and that every dollar invested would always be fully secured by the cash and diamond inventory of Worldwide Diamond.

4. It was a further part of the scheme and artifice to defraud that during the period from March through November 2011, defendants continued to defraud investors by fraudulently concealing from investors that investment funds would be used for purposes unrelated to the purchase and resale of diamonds. These other purposes

included making several loans totaling approximately \$2.4 million to third parties and to defendant **Jiongo** for purposes not disclosed to or authorized by the investors.

5. It was a further part of the scheme and artifice to defraud that all defendants fraudulently concealed from Worldwide Diamond investors that Worldwide Diamond loaned \$1 million to a Global Outreach Industries, a company established and controlled by defendant **Jiongo**. During July and August 2011, defendants agreed to wire transfer \$1 million dollars of investor funds into several bank accounts designated by defendant **Jiongo**. Defendant **Jiongo** caused \$630,000 of these investor funds to be wire transferred directly into a trust account controlled by **Jiongo**. During the period August through November 2011, **Jiongo** caused several wire transfers of funds from his trust account to third parties, as set forth in Counts Two, Three and Four of this indictment.

6. It was a further part of the scheme and artifice to defraud that defendants fraudulently concealed from Worldwide Diamond investors that their investment funds were being not used to purchase and resell new diamonds but to make unauthorized loans and to make “lulling” interest payments to other Worldwide Diamond investors. Defendants also concealed from investors that the source of these interest payments were investment funds previously obtained from other investors.

7. As a result of this scheme to defraud during the period March through November 2011, defendants fraudulently collected about \$5,141,699 from Worldwide Diamond investors.

Interstate Wire Transfers Used to Carry Out the Scheme to Defraud

8. On or about the dates indicated below, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Craig Allen Otteson, Jay Bruce Heimbürger, and Christopher Arnold Jiongo**, for Counts Two, Three and Four, respectively, aided and abetted by each other and by others known and unknown to the Grand Jury, for the purpose of executing the scheme to defraud described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals, and sounds described below for each count, each use of interstate wire communications constituting a separate count of this indictment:

Count	Date of Wire	Description of Interstate Wire Transmission
2	9-15-2011	Wire transfer of \$100,000 from J.P. Morgan Chase Bank account number XXX-XXX- 4187, located in Dallas, Texas in the name of account holder the IOLTA trust account of Christopher Jiongo , to BB&T International Services, in the name of account holder E.L., account number XXX-XXX-0160, located in Charlotte, North Carolina
3	9-21-2011	Wire transfer of \$10,000 from J.P. Morgan Chase Bank account number XXX-XXX- 4187, located in Dallas, Texas in the name of account holder the IOLTA trust account of Christopher Jiongo , to Fifth Third Bank, in the name of account holder R.S., account number XXX-XXX-0314, located in Cincinnati, Ohio

Count	Date of Wire	Description of Interstate Wire Transmission
4	11-18-2011	Wire transfer of \$60,000 from J.P. Morgan Chase Bank account number XXX-XXX- 4187, located in Dallas, Texas in the name of account holder the IOLTA trust account of Christopher Jiongo , to Fifth Third Bank, in the name of account holder R.S., account number XXX-XXX-0314, located in Cincinnati, Ohio

In violation of 18 U.S.C. §§ 1343 and 2.

Counts Five through Ten
Mail Fraud and Aiding and Abetting
(Violations of 18 U.S.C. §§ 1341 and 2)

1. The Grand Jury hereby adopts, realleges and incorporates by reference herein the allegations contained in the Introduction and in Count One of this Indictment as if fully set forth herein.

Scheme to Defraud Investors

2. During the period from in or about March 2011 through May 2013, defendants **Craig Allen Otteson** and **Jay Bruce Heimbarger**, aided and abetted by each other and others both known and unknown to the Grand Jury, knowingly and with the intent to defraud, devised and intended to devise a scheme to deceive and defraud investors, and to obtain money and property from these investors by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means

3. It was a part of the scheme and artifice to defraud that defendants falsely represented to investors that all investment funds would be used to buy and resell diamonds and that every dollar invested would always be fully secured by the cash and diamond inventory of Worldwide Diamond.

4. It was a further part of the scheme and artifice to defraud that during the period from March through November 2011, defendants continued to defraud investors by fraudulently concealing from investors that investment funds would be used for purposes unrelated to the purchase and resale of diamonds. These other purposes

included making several loans totaling about over \$2.4 million to third parties and to defendant Jiongo for speculative high risk ventures. The defendants concealed the existence of these unauthorized loans from Worldwide Diamond investors.

5. It was a further part of the scheme and artifice to defraud that all defendants fraudulently concealed from Worldwide Diamond investors that Worldwide Diamond loaned \$1 million to a Global Outreach Industries, a company formed and controlled by defendant Jiongo.

6. It was a further part of the scheme and artifice to defraud that defendants **Otteson** and **Heimbürger** fraudulently concealed from Worldwide Diamond investors that their investment funds were being used not to purchase and resell new diamonds but to make unauthorized loans and to make “lulling” interest payments to other Worldwide Diamond investors.

7. As a result of this scheme to defraud during the period March 2011 through May 2013, defendants fraudulently collected about \$6,471,699 from 77 Worldwide Diamond investors.

Execution of the Scheme to Defraud Through Use of United States Mails

8. On or about the dates listed below, in the Dallas Division of the Northern District of Texas and elsewhere, defendants **Craig Allen Otteson** and **Jay Bruce Heimbürger**, for Counts Five through Ten, respectively, aided and abetted by each other and by others known and unknown to the Grand Jury, for the purpose of carrying out and executing the scheme and artifice to defraud alleged herein, and attempting to do so, did

knowingly deposit and cause to be deposited and sent and delivered by the United States Postal Service, an envelope, by and through facilities located in the Northern District of Texas, according to the directions thereon, as more fully alleged below:

Count	Date of Mailing	Investor Check Mailed via U.S. Postal Service
5	2-17-2012	<p>Sent by: Investor M.L.</p> <p>Sent to: Worldwide Diamond Ventures</p> <p>Contents: \$50,000 check drawn on the checking account of investor M.L. at Metro United Banks account number XXX-XXX-7611 to purchase one \$50,000 nine month promissory note as an investment in Worldwide Diamond Ventures</p>
6	2-17-2012	<p>Sent by: Investor Y – C.L.</p> <p>Sent to: Worldwide Diamond Ventures</p> <p>Contents: \$80,000 check drawn on the checking account of investor M.L. at Metro United Banks account number XXX-XXX-7611 to purchase one \$80,000 nine month promissory note as an investment in Worldwide Diamond Ventures</p>

Count	Date of Mailing	Investor Check Mailed via U.S. Postal Service
7	3-16-2012	<p>Sent by: Investor K.S.</p> <p>Sent to: Worldwide Diamond Ventures</p> <p>Contents: \$60,000 check drawn on the checking account of investor K.S. at Harleysville Savings Bank account number XXX-XXX-8654 to purchase one \$60,000 nine month promissory note as an investment in Worldwide Diamond Ventures</p>
8	3-18-2013	<p>Sent by: Investor J-F.W.</p> <p>Sent to: Worldwide Diamond Ventures</p> <p>Contents: \$50,000 check drawn on the checking account of investor J-F.W. at J.P. Morgan Chase Bank account number XXX-XXX-9282 to purchase one \$50,000 nine month promissory note as an investment in Worldwide Diamond Ventures</p>
9	3-18-2013	<p>Sent by: Investor H.H.</p> <p>Sent to: Worldwide Diamond Ventures</p> <p>Contents: \$50,000 check drawn on the checking account of investor J-F.W. at J.P. Morgan Chase Bank account number XXX-XXX-9282 to purchase one \$50,000 nine month promissory note as an investment in Worldwide Diamond Ventures</p>
10	4-28-2013	<p>Sent by: Investor Y – N.Z.</p> <p>Sent to: Worldwide Diamond Ventures</p> <p>Contents: \$50,000 check drawn on the checking account of investor Y-N.Z. at Presidential Bank account number XXX-XXX-5315 to purchase one \$50,000 nine month promissory note as an investment in Worldwide Diamond Ventures</p>

In violation of 18 U.S.C. §§ 1341 and 2.

Forfeiture Notice

(18 U.S.C. §§ 982(a)(2); 981(a)(1)(c); and 28 U.S.C. § 2461)

Upon conviction for any of the offenses alleged in Counts One through Ten of this indictment, the defendants, **Craig Allen Otteson, Jay Bruce Heimbürger and Christopher Arnold Jiongo**, shall forfeit to the United States of America, pursuant to 18 U.S.C. §§ 982(a)(2) and 981(a)(1)(c) as incorporated by 28 U.S.C. § 2461(c), any and all property, real or personal, constituting, or derived from proceeds the defendants obtained, directly or indirectly, as a result of any of the offenses alleged in Counts One through Ten, including the total proceeds obtained, directly or indirectly, as a result of any of these offenses, commonly referred to as the “money judgment”. In addition to the money judgment, the property to be forfeited includes, but is not limited to:

Substitute Assets

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 982(b)(1) and 28 U.S.C. § 2461(c), if any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property up to the

value of the previously described property that is subject to forfeiture.

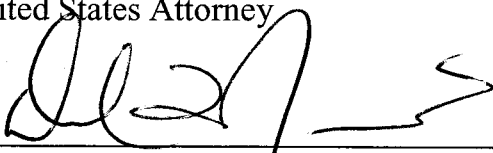
All pursuant to 18 U.S.C. §§ 982, 981, 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c).

A TRUE BILL



FOREPERSON

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v. **3-16 CR - 406 - N**

CRAIG ALLEN OTTESON (01)
JAY BRUCE HEIMBURGER (02)
CHRISTOPHER ARNOLD JIONGO (03)

INDICTMENT

18 USC § 1349 (18 USC § 1343)
Conspiracy to Commit Wire Fraud

18 USC §§ 1343 and 2
Wire Fraud and Aiding and Abetting

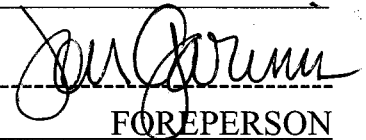
18 USC §§ 1341 and 2
Mail Fraud and Aiding and Abetting

18 USC §§ 982(a)(2); 981(a)(1)(c); and 28 U.S.C. § 2461
Forfeiture Notice
10 Counts

A true bill rendered

DALLAS

Filed in open court this 7th day of September, 2016.


FOREPERSON

Warrant to be Issued for all Defendants



UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending