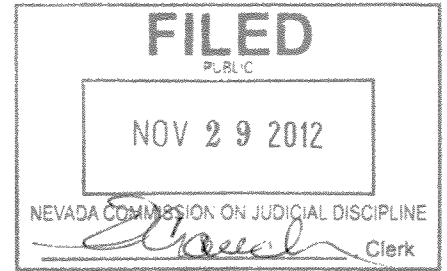


BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE

STATE OF NEVADA



In the Matter of the)

HONORABLE STEVEN E. JONES,)
District Judge, Eighth Judicial)
District Court, County of Clark,)
State of Nevada,)

Respondent.)

CASE NO. 1204-218

ORDER SUSPENDING RESPONDENT
FROM THE EXERCISE OF JUDICIAL OFFICE
WITH SALARY

On November 15, 2012, Commission issued an Amended Notice of Intent to Suspend Respondent With Salary. The document was not filed publicly but a copy of it is attached hereto and will be made part of the public record in this case. The Notice provided the respondent with the opportunity to ask no later than November 28, 2012 for a public hearing prior to the entry of a suspension order. Through his attorney, James Jimmerson, Esq., the respondent has notified the Commission that he does not intend to exercise his statutory right to a public hearing on the issue of interim suspension.

Therefore, by unanimous vote of Commissioners Jones, Vause, Lau, Wagner, Polaha, Armstrong and Chimarusti, the Commission does hereby suspend Judge Steven Jones from the exercise of judicial office, with salary, pursuant to the provisions of Nev. Rev. §1.4675. The reason for this action is that the Commission has been informed that there is now pending an indictment charging the respondent with one or more felony crimes in Case Number 2:12-cr-400, filed on or about October 24, 2012 in the United States District Court for the District of Nevada. A copy of said Indictment is attached hereto and incorporated herein by reference.

The full Commission has authorized the Chairman to sign this order on its behalf. The clerk of the Commission shall immediately serve a copy of the instant order via regular mail to the respondent and special counsel and by certified mail, return receipt requested to his counsel. The clerk will also provide a facsimile copy to respective counsel as soon as it is practicable.

1 The clerk of the Commission shall also deliver a copy of this Order to the chief judge of
2 the Eighth Judicial District Court, the Presiding Judge of the Family Division of the Eighth
3 Judicial District Court, and the Executive Director of the Administrative Office of the Courts.

4 IT IS SO ORDERED.

5 DATED this 29th day of November, 2012.

6 NEVADA COMMISSION ON
7 JUDICIAL DISCIPLINE
8 P.O. Box 48
9 Carson City, NV 89702

10 By: 

DOUG JONES, Chairman

1 CERTIFICATE OF MAILING

2 I hereby certify that I am an employee of the Nevada Commission on Judicial Discipline
3 and on the 29th day of November, 2012, I served the foregoing ORDER SUSPENDING
4 RESPONDENT FROM THE EXERCISE OF JUDICIAL OFFICE WITH SALARY by both
5 faxing the order and placing a copy of the order in the United States Mail, postage pre-paid,
6 addressed to the following persons.

7 Honorable Steven E. Jones
8 320 Glistening Cloud
9 Henderson, NV 89012

10 Mr. James J. Jimmerson, Esq. (Via Certified, Return Receipt Requested)
11 JIMMERSON HANSEN, P.C.
12 415 South Sixth Street, Suite 100
13 Las Vegas, NV 89101
14 Fax: 702/387-1167

15 Ms. Kathleen M. Paustian, Esq.
16 GORDON & REES LLP
17 3770 Howard Hughes Parkway, Ste. 100
18 Las Vegas, NV 89169
19 Fax: 702/255-2858

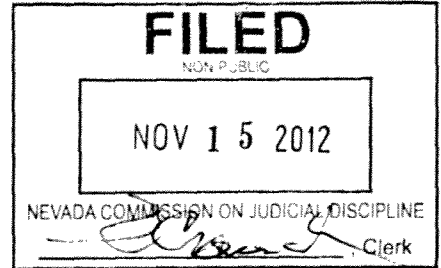
20 Mr. William E. Cooper, Esq.
21 LAW OFFICES OF WILLIAM E. COOPER
22 601 East Bridger Avenue
23 Las Vegas, NV 89101
24 Fax: 702/382-2170

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Eva Crouch, Acting Commission Clerk

BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE

STATE OF NEVADA



In the Matter of the
HONORABLE STEVEN E. JONES,
District Judge, Eighth Judicial
District Court, County of Clark,
State of Nevada,

Respondent.

CASE NO. 2012-115

AMENDED
NOTICE OF COMMISSION'S INTENT TO SUSPEND
RESPONDENT WITH SALARY

You are hereby notified of the Commission's intent to suspend Judge Steven Jones from the exercise of judicial office, with salary, pursuant to the provisions of Nev. Rev. §1.4675. The reason for this action is that the Commission has been informed that there is now pending an indictment charging the respondent with one or more felony crimes in Case Number 2:12-cr-400, filed on or about October 24, 2012 in the United States District Court for the District of Nevada. A copy of said Indictment is attached hereto and incorporated herein by reference.

You are entitled to a minimum of seven (7) days notice before the Commission issues a suspension order, which must be made public. You are also entitled by statute to an opportunity to respond to this notice. You must submit your written, confidential response no later than 4:30 p.m., PST, on Wednesday, November 28, 2012. You are required to submit it to one of the following addresses :

David F. Sarnowski, General Counsel & Executive Director
Nevada Commission on Judicial Discipline
P.O. Box 48
Carson City, NV 89702, OR

David F. Sarnowski, General Counsel & Executive Director
Nevada Commission on Judicial Discipline
3476 Executive Pointe Way, Suite 15
Carson City, NV 89706

...

...

1 You must also provide a copy to:

2 Kathleen M. Paustian, Esq.
3 Gordon & Rees LLP
3770 Howard Hughes Pkwy, Suite 100
4 Las Vegas, NV 89169, AND

5 William E. Cooper, Esq.
6 Law Offices of William E. Cooper, Esq.
601 East Bridger Avenue
Las Vegas, NV 89101

7
8 You may submit any written response, including any waiver of said hearing, via facsimile
9 transmission to the Commission's office, at 775/687-3607, in which case you must also provide
10 an original and nine (9) copies to either the mailing or physical address listed above. That set of
11 document(s) must be served by mail the same day as you submit any document by facsimile.

12 In the event you exercise your right to request a public hearing pursuant to statute, the
13 Commission will set the time and place for hearing in due course. Should such a hearing be
14 conducted, the respondent will be required to be present physically.

15 The full Commission has authorized the Chairman to sign this order on its behalf.

16 The clerk of the Commission shall immediately serve a copy of the instant order via
17 regular mail to the respondent and special counsel and by certified mail, return receipt requested
18 to his counsel. The clerk will also provide a facsimile copy to respective counsel as soon as it is
19 practicable.

20 IT IS SO ORDERED.

21 DATED this 15th day of November, 2012.

22 NEVADA COMMISSION ON
23 JUDICIAL DISCIPLINE
24 P.O. Box 48
Carson City, NV 89702

25
26 By: _____


DOUG JONES, Chairman

1 CERTIFICATE OF MAILING

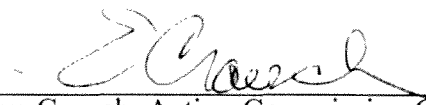
2 I hereby certify that I am an employee of the Nevada Commission on Judicial Discipline
3 and on the 15th day of November, 2012, I served the foregoing AMENDED NOTICE OF
4 COMMISSION'S INTENT TO SUSPEND RESPONDENT WITH SALARY by both faxing the
5 order and placing a copy of the order in the United States Mail, postage pre-paid, addressed to
6 the undersigned.

7 Hon. Steven E. Jones
8 320 Glistening Cloud
9 Henderson, NV 89012

10 Mr. James J. Jimmerson, Esq. (Via Certified, Return Receipt Requested)
11 JIMMERSON HANSEN, P.C.
12 415 South Sixth Street, Suite 100
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15 Ms. Kathleen M. Paustian, Esq.
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17 3770 Howard Hughes Parkway, Ste. 100
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21 LAW OFFICES OF WILLIAM E. COOPER
22 601 East Bridger Avenue
23 Las Vegas, NV 89101
24 Fax: 702/382-2170

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Eva Crouch, Acting Commission Clerk

1 DANIEL G. BOGDEN
United States Attorney
2 STEVEN W. MYHRE
First Assistant United States Attorney
3 333 Las Vegas Blvd., South, Ste. 5000
Las Vegas, Nevada 89101
4 Phone: (702) 388-6336
Fax: (702) 388-6296
5

FILED ENTERED	RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD
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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 STEVEN E. JONES,
THOMAS A. CECRLE, Jr.,
13 CONSTANCE C. FENTON,
TERRY J. WOLFE,
14 MARK L. HANSEN, and
ASHLEE M. MARTIN,

15 Defendants.
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CRIMINAL INDICTMENT

2:12-cr- 400

VIOLATIONS:

Title 18, United State Code, Section 1349 –
Conspiracy to Commit Mail Fraud and Wire
Fraud (Count One) (as to all defendants)

Title 18, United States Code, Section 1343
and 2– Wire Fraud (Counts Two through
Seven) (as to all defendants)

Title 15 United States Code, Section 78j(b)–
Securities Fraud (Count Eight)
(as to all defendants)

Title 18, United States Code, Section
1956 (h) – Conspiracy to Commit Money
Laundering (Count Nine) (as to all
defendants)

Title 18, United States Code, Section 1957
and 2- Engaging in Money Transactions in
Property Derived from Specified Unlawful
Activity (Counts Ten and Eleven) (as to all
defendants)

Title 18, United States Code, Section
1956(a)(1)(B)(i) – Laundering of Monetary
Instruments (Counts Twelve through Twenty)
(as to all defendants)

The Grand Jury charges that all times relevant to this Indictment:

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1 9. As part of the scheme and artifice, defendant **CECRLE** constructed a false story that
2 he held a special position with the United States government with access to public officials and secret
3 government programs. He falsely represented that by virtue of his position and access, he had obtained
4 exclusive and valuable rights and interests in property, including water rights in Northern Arizona, rights
5 to land on the Las Vegas strip, and rights and access to war bonds from the World War I era. Defendant
6 **CECRLE** further represented falsely that these rights and interests could be fully secured only if he
7 obtained a short-term loan or investment of cash which he falsely promised to repay at a rate of return in
8 excess of several thousand percent. In truth and in fact, defendant **CECRLE** was unemployed and not
9 connected to public officials or government programs and agencies in any legitimate way and none of the
10 purported rights or property interests existed.

11 10. As a further part of the scheme and artifice, the defendants worked together to advance
12 and perpetuate the false pretense that defendant **CECRLE** was who he purported to be and that the
13 fraudulent investments in fact existed. Using the mail, telephones, interstate wires, the internet, banks, and
14 other means and instrumentalities of interstate commerce, the defendants advertised, solicited, and
15 promoted their fraudulent scheme to victims across the United States.

16 11. As a further part of the scheme and artifice, the defendants typically solicited odd sums
17 of money in amounts of less than \$10,000 as loans or investments and claimed the money was needed
18 urgently. The defendants requested their victims to advance the money to them through wire transfers,
19 prepaid credit cards, direct bank deposits, or intra-bank account transfers. During the course of the scheme,
20 the defendants established and maintained at least ten (10) different bank accounts through which they
21 moved and laundered their fraudulent proceeds. To further conceal their activities and avoid detection, the
22 defendant typically deposited and withdrew sums of cash from financial institutions in amounts less than
23 \$10,000 in order to avoid currency transaction reporting requirements.

24 12. As a further part of the scheme and artifice, the defendants quickly converted investor
25 funds to their own purposes, such as living and gambling expenses, and then returned to their victims to
26 solicit more money, falsely claiming that circumstances had intervened to prevent the investment from
27 being fully realized and that additional money was needed to conclude the transaction. By repeating this
28 process with numerous victims, the defendants obtained more than \$ 3 million in proceeds from the fraud.

1 13. As a further part of the scheme and artifice, when victims questioned the legitimacy
2 of the high yield investment or when none of the money was repaid as promised, the defendants lulled
3 investors into a false sense of security by referring the victims to defendant **JONES**, a sitting Nevada
4 district court judge. The defendants told potential and disgruntled investors that defendant **JONES** knew
5 of defendant **CECRLE** and the investments, approved of them, and would vouch for him. Thereafter,
6 defendant **JONES** met with investors in chambers, over the telephone, and elsewhere and, using his office
7 as a district judge, knowingly vouched for defendant **CECRLE** and the high yield investment programs,
8 assuring investors that the scheme was sound, when he knew full well that other investors had never been
9 paid and that defendant **CECRLE** and the scheme were a fraud.

10 14. As a further part of the scheme and artifice, defendant **JONES** used his position as a
11 district court judge to intervene on behalf of defendant **CECRLE** with disgruntled investors to prevent or
12 delay legal process against defendant **CECRLE** and thus allow him to continue the scheme. Defendant
13 **JONES** also drafted and reviewed documents associated with the sham investments in an attempt to lend
14 some indicia of legitimacy to the otherwise fraudulent scheme and to lull investors into a false impression
15 that the scheme was legitimate.

16 15. As a further part of the scheme and artifice, defendant **JONES** used his position as a
17 district judge to act as a middleman for defendant **CECRLE**, fielding telephone calls for him in chambers
18 and receiving cash proceeds from the fraudulent scheme at the courthouse where he presided over cases.
19 During the course of the scheme, defendant **JONES** established and maintained a joint bank account with
20 defendant **CECRLE** through which they received and laundered in excess of \$ 250,000 in proceeds from
21 the fraud.

22 16. As a further part of the scheme and artifice, defendants **FENTON**, **WOLFE**,
23 **HANSEN**, and **MARTIN** used the telephone, mail, internet and other means and instrumentalities of
24 interstate commerce to solicit money, lull investors, direct the movement of money, pick up and deliver
25 money, establish and maintain bank accounts through which to move money, and to otherwise maintain
26 the false and fraudulent pretense that defendant **CECRLE** was who he purported to be and that the
27 fraudulent investments in fact existed.
28 . . .

1 17. It was further part of the scheme and artifice to defraud that the defendants made such
2 other false, fraudulent, deceptive and deceitful representations as necessary to advance their fraudulent
3 scheme, conceal their fraudulent activities from others, avoid detection, enrich themselves and cause
4 devastating losses to their victims.

5 **COUNT ONE**

6 Conspiracy

7 (Title 18, United States Code, Section 1349)

8 18. Paragraphs 1 through 17 are incorporated herein as if set forth in full.

9 19. Beginning at a time unknown to the Grand Jury, but no later than September 2002,
10 and continuing until on or about October 2012, in the State and Federal District of Nevada, and elsewhere,

11 **STEVEN E. JONES,**
12 **THOMAS A. CECRLE, Jr.,**
13 **TERRY J. WOLFE,**
14 **CONSTANCE C. FENTON,**
15 **ASHLEE M. MARTIN, and**
16 **MARK L. HANSEN,**

17 defendants herein, did conspire, confederate and agree with each other, and with others known and
18 unknown to the Grand Jury, to commit the crime of wire fraud, in violation of Title 18, United States Code,
19 Section 1343.

20 20. The object of the conspiracy was to devise, intend to devise, and participate in the
21 material scheme and artifice to defraud as set forth herein for the purposes of obtaining money and property
22 from others.

23 21. In furtherance of the conspiracy, the defendants performed the overt acts charged in
24 Counts Two through Six of this Indictment.

25 All in violation of Title 18, United States Code, Section 1349.

26 **COUNTS TWO THROUGH SIX**

27 Fraud by Wire

28 (Title 18, United States Code, Section 1343)

 22. Paragraph 1 through 21 are incorporated herein as if set forth in full.

 23. On or about the dates set forth below, in the State and Federal District of Nevada, and
elsewhere,

 . . .

STEVEN E. JONES,
THOMAS A. CECRLE, Jr.,
TERRY J. WOLFE,
CONSTANCE C. FENTON,
ASHLEE M. MARTIN, and
MARK HANSEN,

defendants herein, aided and abetted by each other, for the purpose of executing the scheme and artifice set forth herein, and attempting to do so, did knowingly transmit and cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, and pictures, as follows:

	<u>Date</u>	<u>Origin</u>	<u>Destination</u>	<u>Description</u>
Count Two	12/13/2007	Gig Harbor, WA	Salinas, CA	Internet transmission of Settlement Agreement and Mutual Release from defendant Fenton to victim C.D.
Count Three	01/19/2008	Gig Harbor, WA	Las Vegas, NV	Western Union Wire of \$1000 to defendant Mark Hansen
Count Four	02/10/2008	Gig Harbor, WA	Las Vegas, NV	Western Union Wire of \$550 to defendant Mark Hansen
Count Five	10/17/2009	Chemic, NY	Las Vegas, NV	Moneygram Wire of \$2,995 to defendant Thomas Cecrle
Count Six	06/05/2010	Islandia, NY	Las Vegas, NV	Moneygram Wire of \$ 3,500 to defendant Thomas Cecrle
Count Seven	05/08/2011	Mesa, AZ	Las Vegas, NV	Western Union Wire of \$1,550 to defendant Terry Wolfe

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT EIGHT
Securities Fraud
(Title 15, United States Code, Section 78j(b))

24. Paragraphs 1 through 21 are incorporated herein as if set forth in full.
25. From on or about September 2002, and continuing until on or about October 2012, in the State and Federal District of Nevada, and elsewhere,

1 STEVEN E. JONES,
2 THOMAS A. CECRLE, Jr.,
3 TERRY J. WOLFE,
4 CONSTANCE C. FENTON,
5 ASHLEE M. MARTIN and
6 MARK HANSEN,

7 defendants herein, and others known and unknown to the Grand Jury, aided and abetted by each other,
8 unlawfully, knowingly, and willfully, by the use of means and instrumentalities of interstate commerce, the
9 mail, and the wires, did, directly and indirectly, use and employ manipulative and deceptive devices and
10 contrivances in connection with the purchase and sale of a security, that is: investment contracts and/or
11 loans, and did: (a) employ a device, scheme and artifice to defraud; (b) make untrue statements of material
12 facts and omit to state material facts necessary in order to make the statements made, in light of the
13 circumstances under which they were made, not misleading; and (c) engage in acts, practices and courses
14 of business which would and did operate as a fraud and deceit upon members of the investing public, in
15 connection with the sale of said securities.

16 All in violation of Title 15, United States Code, Sections 78j(b) and 78ff(a); Title 17, Code
17 of Federal Regulations, Section 240.10b-5; and Title 18, United States Code, Section 2.

18 COUNT NINE

19 Conspiracy to Commit Money Laundering
20 (Title 18, United States Code, Section 1956(h))

21 26. Paragraphs 1 through 23 are incorporated herein as if set out in full.

22 27. Beginning at a time unknown to the Grand Jury, but no later than on or about September
23 2002, and continuing until on or about October 2012, in the State and Federal District of Nevada, and
24 elsewhere,

25 STEVEN E. JONES,
26 THOMAS A. CECRLE, Jr.,
27 TERRY J. WOLFE,
28 CONSTANCE C. FENTON,
 ASHLEE M. MARTIN, and
 MARK HANSEN,

defendants herein, did conspire, confederate and agree with each other, and with others known and
unknown to the Grand Jury, to commit the crime of money laundering, in violation of Title 18, United
States Code, Sections 1956(a)(1)(B)(i); and 1957(a).

28. It was an object of the conspiracy to knowingly conduct, and attempt to conduct, a financial transaction which involved the proceeds of the fraud specified herein, with the intent to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the fraud.

29. It was an object of the conspiracy to knowingly engage, or attempt to engage, in a monetary transaction in property greater than \$10,000 which was derived from the fraud as specified herein.

30. In furtherance of the conspiracy, the defendants performed the overt acts charged in Counts Ten through Twenty of this Indictment.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS TEN AND ELEVEN

Money Transactions in Property Derived from Specified Unlawful Activity
(Title 18, United States Code, Section 1957)

31. Paragraphs 1 through 30 are incorporated herein as if set forth in full.

32. On or about the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

**STEVEN E. JONES,
THOMAS A. CECRLE, Jr.,
TERRY J. WOLFE,
CONSTANCE C. FENTON,
ASHLEE M. MARTIN and
MARK HANSEN,**

defendants herein, aided and abetted by each other, did knowingly engage, and attempt to engage, in a monetary transaction affecting interstate and foreign commerce in criminal derived property of a value greater than \$10,000, which was derived from specified unlawful activity, namely Wire Fraud in violation of Title 18, United States Code, Section 1343; and Securities Fraud, in violation of Title 15, United States Code, Section 78j(b), as more fully described in Counts One through Seven of this Indictment, to wit:

Count	Date	Transaction	Account
Ten	01/02/2008	\$ 40,000 Cashier's Check	Fenton/Cecrle Wells Fargo Acct. ###153
Eleven	01/07/2008	\$ 29,300 Deposit	Jones/Cecrle Wells Fargo Acct. ###421

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNTS TWELVE TO TWENTY
Laundering of Monetary Instruments
(Title 18, United States Code, Section 1956(a)(1)(B)(i))

33. Paragraphs 1 through 30 are incorporated herein as if set forth in full.

34. On or about the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

**STEVEN E. JONES,
THOMAS A. CECRLE, Jr.,
TERRY J. WOLFE,
CONSTANCE C. FENTON,
ASHLEE M. MARTIN, and
MARK HANSEN,**

defendants herein, aided and abetted by each other, did knowingly conduct, and attempt to conduct, a financial transaction which involved the proceeds of specified unlawful activity, namely Wire Fraud in violation of Title 18, United States Code, Section 1343; and Securities Fraud, in violation of Title 15, United States Code, Section 78j(b), as more fully described in Counts One through Eight of this Indictment, with the intent to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the specified unlawful activity, to wit:

Count	Date	Transaction	Account
Twelve	11/16/2007	\$503 Cash Withdrawal	Jones/Cecrle Wells Fargo Acct. ###421
Thirteen	01/07/2008	\$1,000 Cash Deposit	Hansen Wells Fargo Acct. ###251
Fourteen	01/08/2008	\$9,400 Cash Withdrawal	Jones/Cecrle Wells Fargo Acct. ###421
Fifteen	05/27/2008	\$5,200 Cash Deposit	Wolfe Bank of America Acct. ###682
Sixteen	01/23/2009	\$5,100 Cash Withdrawal	Bank of America Acct. ###299
Seventeen	01/27/2010	\$6,440 Cash Withdrawal	Martin Bank of America Acct. ###134
Eighteen	07/23/2010	\$1,665 Cash Withdrawal	Martin Bank of America Acct. ###134
Nineteen	08/12/2011	\$9,840 Cash Withdrawal	Martin Bank of America Acct. ###134
Twenty	12/02/2011	\$7,200 Cash Withdrawal	Martin Bank of America Acct. ###339

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

FORFEITURE ALLEGATION ONE

1. The allegations contained in Counts One through Seven of this Criminal Indictment are hereby Realleges and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C); and Title 28, United States Code, Section 2461(c).

**STEVEN E. JONES,
THOMAS A. CECRLE, Jr.,
TERRY J. WOLFE,
CONSTANCE C. FENTON,
ASHLEE M. MARTIN, and
MARK HANSEN,**

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants –

- 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 that cannot be divided without difficulty;

• • •

1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C); and Title 28, United
2 States Code, Section 2461(c); Title 18, United States Code, Section 1343, a specified unlawful activity as
3 defined in Title 18, United States Code, Sections 1956(c)(7) and 1961(1)(B); Title 18, United States Code,
4 Section 1349; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION TWO**
6 Securities Fraud

7 1. The allegations contained in Count Eight of this Criminal Indictment are hereby Realleges
8 and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United
9 States Code, Section 981(a)(1)(C); and Title 28, United States Code, Section 2461(c).

10 2. Upon conviction of any of the felony offenses charged in Count Seven of this Criminal
11 Indictment,

12 **STEVEN E. JONES,**
13 **THOMAS A. CECRLE, Jr.,**
14 **TERRY J. WOLFE,**
CONSTANCE C. FENTON,
ASHLEE M. MARTIN and
MARK HANSEN,

15 defendants herein, shall forfeit to the United States of America, any property, real or personal, which
16 constitutes or is derived from proceeds traceable to violations of fraud in the sale of securities under Title
17 15, United States Code, Sections 78j(b) and 78ff(a); specified unlawful activities as defined in Title 18,
18 United States Code, Sections 1956(c)(7)(A) and 1961(1)(D); or a conspiracy to commit such offenses, an
19 *in personam* criminal forfeiture money judgment of \$1,500,000 in United States Currency.

20 3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section
21 981(a)(1)(C); and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the
22 defendants –

- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a third party;
25 c. has been placed beyond the jurisdiction of the court;
26 d. has been substantially diminished in value; or
27 e. has been commingled with other property that cannot be divided without difficulty;
28 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p),

1 to seek forfeiture of any properties of the defendants for the *in personam* criminal forfeiture money
2 judgment of \$1,500,000 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C); and Title 28, United
4 States Code, Section 2461(c); Title 15, United States Code, Sections 78j(b) and 78ff(a), fraud in the sale
5 of securities, specified unlawful activities as defined in Title 18, United States Code, Sections 1956(c)(7)
6 and 1961(1)(D); and Title 21, United States Code, Section 853(p).

7 **FORFEITURE ALLEGATION THREE**

8 Conspiracy to Commit Money Laundering,
9 Money Transactions in Property Derived from Specified Unlawful Activities, and
10 Laundering of Money Instruments

11 1. The allegations contained in Counts Nine through Twenty of this Criminal Indictment are
12 hereby Realleges and incorporated herein by reference for the purpose of alleging forfeiture pursuant to
13 Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

14 2. Upon conviction of any of the felony offenses charged in Counts Eight through Sixteen
15 of this Criminal Indictment,

16 **STEVEN E. JONES,**
17 **THOMAS A. CECRLE, Jr.,**
18 **TERRY J. WOLFE,**
19 **CONSTANCE C. FENTON,**
20 **ASHLEE M. MARTIN, and**
21 **MARK HANSEN,**

22 defendants herein, shall forfeit to the United States of America, any property, real or personal, which
23 constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Sections
24 1956(a)(1)(B)(i), 1956(h), and 1957, specified unlawful activities as defined in Title 18, United States
25 Code, Sections 1956(c)(7)(A) and 1961(1)(B), or Title 18, United States Code, Section 1956(h), conspiracy
26 to commit such offenses, an *in personam* criminal forfeiture money judgment of \$1,500,000 in United
27 States Currency.

28 3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section
981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the
defendants –

a. cannot be located upon the exercise of due diligence;

1 b. has been transferred or sold to, or deposited with, a third party;
2 c. has been placed beyond the jurisdiction of the court;
3 d. has been substantially diminished in value; or
4 e. has been commingled with other property that cannot be divided without difficulty;
5 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p),
6 to seek forfeiture of any properties of the defendants for the *in personam* criminal forfeiture money
7 judgment of \$3,000,000 in United States Currency.

8 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
9 Code, Section 2461(c); Title 18, United States Code, Sections 1956(a)(1)(B)(i), 1956(h), and 1957,
10 specified unlawful activities as defined in Title 18, United States Code, Sections 1956(c)(7) and
11 1961(1)(B); and Title 21, United States Code, Section 853(p).

12 **FORFEITURE ALLEGATION FOUR**
13 Conspiracy to Commit Money Laundering,
14 Money Transactions in Property Derived from Specified Unlawful Activities, and
15 Laundering of Money Instruments

16 1. The allegations contained in Counts Nine through Twenty of this Criminal Indictment are
17 hereby Realleges and incorporated herein by reference for the purpose of alleging forfeiture pursuant to
18 Title 18, United States Code, Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c).

19 2. Upon conviction of any of the felony offenses charged in Counts Eight through Sixteen
20 of this Criminal Indictment,

21 STEVEN E. JONES,
22 THOMAS A. CECRLE, Jr.,
23 TERRY J. WOLFE,
24 CONSTANCE C. FENTON,
25 ASHLEE M. MARTIN, and
26 MARK HANSEN,

27 defendants herein, shall forfeit to the United States of America, any property, real or personal, involved in
28 transactions or attempted transactions in violation of Title 18, United States Code, Sections
1956(a)(1)(B)(i), 1956(h), and 1957, or any property traceable to such property, an *in personam* criminal
forfeiture money judgment of \$3,000,000 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants –

- 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 that cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants for the *in personam* criminal forfeiture money judgment of \$3,000,000 in United States Currency.

All pursuant to Title 18, United States Code, Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Sections 1956(a)(1)(B)(i), 1956(h), and 1957; and Title 21, United States Code, Section 853(p).

FORFEITURE ALLEGATION FIVE
Conspiracy to Commit Money Laundering,
Money Transactions in Property Derived from Specified Unlawful Activities, and
Laundering of Money Instruments

1. The allegations contained in Counts Eight through Sixteen of this Criminal Indictment are hereby Realleges and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of any of the felony offenses charged in Counts Eight through Sixteen of this Criminal Indictment,

**STEVEN E. JONES,
THOMAS A. CECRLE, Jr.,
TERRY J. WOLFE,
CONSTANCE C. FENTON,
ASHLEE M. MARTIN, and
MARK HANSEN.**

defendants herein, shall forfeit to the United States of America, any property, real or personal, involved in violations of Title 18, United States Code, Sections 1956(a)(1)(B)(i), 1956(h), and 1957, or any property

1 traceable to such property, an *in personam* criminal forfeiture money judgment of \$1,500,000 in United
2 States Currency.

3 3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section
4 982(a)(1), as a result of any act or omission of the defendants –

- 5 a. cannot be located upon the exercise of due diligence;
6 b. has been transferred or sold to, or deposited with, a third party;
7 c. has been placed beyond the jurisdiction of the court;
8 d. has been substantially diminished in value; or
9 e. has been commingled with other property that cannot be divided without difficulty;

10 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p),
11 to seek forfeiture of any properties of the defendants for the *in personam* criminal forfeiture money
12 judgment of \$3,000,000 in United States Currency.

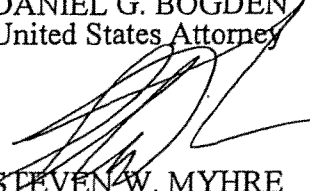
13 All pursuant to Title 18, United States Code, Section 982(a)(1); Title 18, United States Code,
14 Sections 1956(a)(1)(B)(i), 1956(h), and 1957; and Title 21, United States Code, Section 853(p).

15 **DATED:** this 24 day of October, 2012.

16 **A TRUE BILL:**

17
18 /S/
19 FOREPERSON OF THE GRAND JURY

20 DANIEL G. BOGDEN
21 United States Attorney

22 
23 STEVEN W. MYHRE
24 Assistant United States Attorney
25
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27
28