

AUG 19 2009

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U. S. DISTRICT COURT
E. DISTRICT OF MO.

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) No.
)
 LEONA JACKSON,)
)
 Defendant.)

4:09CR 00537CAS

INDICTMENT

COUNT ONE
(Wire Fraud)

INTRODUCTION

The Grand Jury charges that:

1. From 1998 to the present Defendant Leona Jackson was married to Randall Jackson ("Husband").
2. On or about July 2, 1998, Defendant and Husband purchased a residence located at 2346 Outlook Drive in St. Louis County, Missouri within the Eastern District of Missouri (the "Residence"). The couple owned the Residence as Husband and Wife.
3. From February 5, 2003 through June 21, 2006, Husband was incarcerated at the United States Bureau of Prisons facility in Florence, Colorado pursuant to a conviction and sentence for Conspiracy of Distribute Heroin. During this time of incarceration, Husband was not permitted to leave the prison.
4. On or about January 19, 2005, Defendant and a man posing as Husband attempted to refinance the mortgage on the Residence. The identity of this man ("John Doe") is unknown to the Grand Jury. In the course of the refinancing process, Defendant had John Doe present

himself to Intervale Mortgage Company as Husband and otherwise authorized to enter into the mortgage agreement and agreeable to and bound by its terms. Defendant successfully presented John Doe as Husband and was able to refinance her mortgage with Intervale Mortgage Company ("Intervale). After refinancing, Defendant agreed to a new mortgage of approximately \$85,000 to be secured by the Residence and, in addition to paying off the existing mortgage on the Residence, took out approximately \$20,000 at closing.

5. Defendant has failed to make payments on the foregoing note as promised.

OFFENSE CONDUCT

6. On or about the 19th day of January, 2005, in the Eastern District of Missouri and elsewhere, the defendant,

LEONA JACKSON,

devised a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises and, in furtherance and execution of the same scheme and artifice, caused to be sent in interstate commerce writings, signs, signals, pictures and sounds, to wit: the interstate wiring of funds to the escrow account of to facilitate the closing of the sale of the Residence.

In violation of Title 18, United States Code Section 1343.

A TRUE BILL

FOREPERSON

MICHAEL W. REAP
Acting United States Attorney

Thomas C. Albus, #96250