

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA**

**v.**

**CRIMINAL NO. 3:24CR005-MPM-RP**

**DEANDRE JONES**

**PLEA AGREEMENT**

The United States Attorney hereby proposes to the Court a plea agreement to be filed in this cause under Rule 11(c) of the Federal Rules of Criminal Procedure. Defendant has read and fully understands this plea agreement and approves same, realizing that the plea agreement is subject to acceptance or rejection by the Court. The plea agreement is as follows:

1. **GUILTY PLEA:** The defendant agrees to plead guilty under oath to Counts One and Five of the Indictment.

A. Count One charges that beginning at a date unknown to the Grand Jury, but from on or about January of 2021, and continuing through August of 2021, in the Northern District of Mississippi, DEANDRE JONES did knowingly and willfully conspire and agree with ZIPORA HUDSON and MONTREAL HUDSON to devise a scheme to defraud others, and to obtain money by means of false and fraudulent pretenses, representations and promises; and for the purpose of executing the scheme to defraud, caused a signal to be transmitted by means of a wire communication in interstate commerce, in violation of 18 U.S.C. § 1343, all in violation of 18 U.S.C. § 1349. Count One carries maximum possible penalties of not more than 30 years imprisonment, not more than a \$250,000 fine, or both, not more than a three year term of supervised release, a \$100 special assessment and restitution as appropriate.

*D.S.*

B. Count Five charges that beginning at a date unknown to the Grand Jury, but from on or about June of 2020, and continuing through December of 2021, in the Northern District of Mississippi, and elsewhere, DEANDRE JONES and did knowingly and intentionally conspire and agree with ZIPORA HUDSON and MONTREAL HUDSON to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: knowingly conducting and attempting to conduct financial transactions affecting interstate commerce involving the proceeds of specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, and conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, with the intent to promote the carrying on of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, the Defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i). Count Five carries maximum possible penalties of not more than 20 years imprisonment, not more than a \$500,000 fine, or both, not more than a three year term of supervised release a \$100 special assessment and restitution as appropriate.

2. OTHER CHARGES: The United States agrees not to charge the defendant with any other offenses arising from or related to the above charge and agrees to dismiss all other charges in the Indictment upon the conclusion of sentencing on Count One of the Indictment.

3. RESTITUTION: The defendant understands that the Court may order restitution in accordance with the provisions of 18 U.S.C. Section 3663 for all offenses committed and specifically agrees that restitution is not limited to the count of conviction.



4. FORFEITURE: Following the entry of Defendant's guilty plea, the Defendant agrees to truthfully account for and characterize the nature and value of all of Defendant's assets. In addition, the defendant agrees to forfeit of all right, title and interest defendant has in certain real and personal property, described as "Forfeitable Property," including, but not limited to:

A. All right, title, and interest in real property identified as LOT 65, SECTION C, FOREST HILL SUBDIVISION, situated in Section 7, Township 2 South, Range 5 West, DeSoto County, Mississippi, as per plat thereof recorded in Plat Book 49, Page 31 in the office of the Chancery Clerk of DeSoto County, Mississippi.

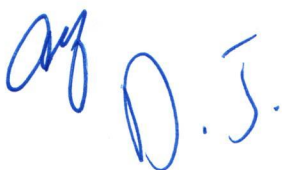
B. All right, title, and interest in one (1) Black 2022 Dodge Ram 3500 Tradesman Crew Cab, VIN: 3C63RRGL7NG157896;

C. All right, title, and interest in one (1) Gray 2015 BMW Coupe, VIN: WBY2Z2C56FV674360

If the United States Attorney determines that any Forfeitable Property

- (1) Cannot be located upon the exercise of due diligence;
- (2) Has been transferred, sold to or deposited with, a third person;
- (3) Has been placed beyond the jurisdiction of the Court;
- (4) Has been substantially diminished in value; or,
- (5) Has been commingled with other property which cannot be subdivided without difficulty;

then the United States Attorney shall be entitled to the forfeiture of all right, title and interest defendant has in real and personal property (hereinafter referred to as "Substitute Assets") up to



the value of any Forfeitable Property pursuant to 21 U.S.C. § 853(p).

5. OTHER AUTHORITIES: This agreement does not bind any prosecuting authority of any state or any other federal district, nor does it bind the Attorney General of the United States with regard to any matter, criminal or civil, involving federal tax laws. Nor does this agreement bind the United States or any of its departments or agencies with regard to any civil or administrative actions or remedies.


6. VIOLATIONS OF THIS AGREEMENT: If defendant violates this agreement, all statements made pursuant hereto will be admissible against defendant, who hereby waives the provisions of Rule 11(f) of the Federal Rules of Criminal Procedure and Rule 410 of the Federal Rules of Evidence. Defendant may also, in that event, be prosecuted for all federal offenses, including perjury and false statements relating to this plea agreement.

7. ACKNOWLEDGMENTS: Apart from being advised of the applicability of the U.S. Sentencing Guidelines, and other than as set forth elsewhere in the plea documents, no promise or representation whatsoever has been made to defendant as to what punishment the Court might impose if it accepts the plea of guilty. This agreement fully reflects all promises, agreements, and understandings between the defendant and the United States Attorney.

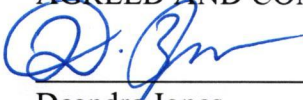
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The defendant's agreement is knowing, free, and voluntary, and not the product of force, threat, or coercion. The defendant is pleading guilty because defendant is in fact guilty.

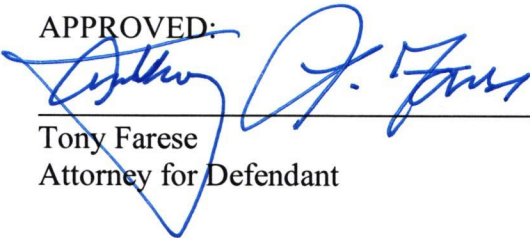
This the 1<sup>st</sup> day of ~~March~~ <sup>April</sup>, 2024.

  
\_\_\_\_\_  
CLAY JOYNER  
United States Attorney  
MS Bar No. 10316

AGREED AND CONSENTED TO:

  
\_\_\_\_\_  
Deandre Jones  
Defendant

APPROVED:

 MSB# 5733  
\_\_\_\_\_  
Tony Farese  
Attorney for Defendant

any  
D.S.