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8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **IN AND FOR THE COUNTY OF NEVADA**  
10

11 THE PEOPLE OF THE STATE OF  
12 CALIFORNIA,

Plaintiff,

13 -vs-

14 **JAMIE JONES**  
15 **DOB: 11/08/1979**

16 **CHRISTOPHER MICHAEL WACKERLY**  
17 **DOB: 08/18/1987**

Defendants.

**Case No.:**

**FELONY INDICTMENT**

18 **COUNT I**  
19

20 On or about and in between January 1, 2018 and May 3, 2025, in the County of Nevada, State  
21 of California, the crime of Theft by Embezzlement in violation of PC503, a Felony, was  
22 committed in that JAMIE JONES did fraudulently appropriate property valued in excess of  
23 \$950 to wit, funds exceeding JAMIE JONES' contractual compensation, the property of the  
24 Fire Safe Council of Nevada County, who had entrusted him/her with said property, a felony.  
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ENHANCEMENT

PC12022.6(A)(1): Special Allegation-Great Monetary Value Over \$50,000

It is further alleged as to Count 1 that in the commission of the above offense(s) the said defendant, JAMIE JONES, with the intent to do so, took property of a value exceeding \$50,000, within the meaning of Penal Code section 12022.6(a)(1).

ENHANCEMENT

PC186.11(A)(3): Special Allegation-Aggravated White Collar Crime- Loss > \$100,000

Furthermore, as to Counts 1-17, the offenses alleged are related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct, and the pattern of related felony conduct involved resulted in a total loss by the Fire Safe Council of Nevada County and the State of California of more than one hundred thousand dollars (\$100,000), thus subjecting JAMIE JONES AND CHRISTOPHER WACKERLY to the additional punishment provided for in Penal Code sections 186.11(a)(3) and 12022.6(a)(1) and (2).

**COUNT II**

On or about and in between Jan 1, 2018 and May 3, 2025, in the County of Nevada, State of California, the crime of Theft by Embezzlement in violation of PC503, a Felony, was committed in that JAMIE JONES AND CHRISTOPHER MICHAEL WACKERLY did fraudulently appropriate property valued in excess of \$950, to wit, funds exceeding Christopher Wackerly's contractual compensation, the property of the Fire Safe Council of Nevada County, who had entrusted him/her with said property, a felony.

ENHANCEMENT

PC12022.6(A)(1): Special Allegation-Great Monetary Value Over \$50,000

It is further alleged as to Count 2 that in the commission of the above offense(s) the said defendants, CHRISTOPHER MICHAEL WACKERLY AND JAMIE JONES, with the intent to do

1 so, took property of a value exceeding \$50,000, within the meaning of Penal Code section  
2 12022.6(a)(1).

3  
4 **COUNT III**

5 On or about and in between Jan 1, 2018 and May 3, 2025, in the County of Nevada, State of  
6 California, the crime of Grand Theft in violation of PC487(a), a Felony, was committed in that  
7 JAMIE JONES AND CHRISTOPHER MICHAEL WACKERLY did knowingly and designedly,  
8 by a false and fraudulent representation and pretense, obtain money, labor, or real and  
9 personal property by fraud from the Fire Safe Council of Nevada County, specifically, funds in  
10 excess of CHRISTOPHER WACKERLY'S contractual compensation, which had a value  
11 exceeding nine hundred fifty dollars (\$950).

12 **ENHANCEMENT**

13 PC12022.6(A)(1): Special Allegation-Great Monetary Value Over \$50,000

14 It is further alleged as to Count 3 that in the commission of the above offense(s) the said  
15 defendants, CHRISTOPHER MICHAEL WACKERLY AND JAMIE JONES, with the intent to do  
16 so, took, damaged, and destroyed property of a value exceeding \$50,000, within the meaning  
17 of Penal Code section 12022.6(a)(1).  
18 16,2,3 Jail+\$0-10,000

19 **COUNT IV**

20 On or about and in between Jan 1, 2018 and May 3, 2025 in the County of Nevada, State of  
21 California, the crime of Theft by Embezzlement in violation of PC503, a Felony, was committed  
22 in that JAMIE JONES AND CHRISTOPHER MICHAEL WACKERLY did fraudulently  
23 appropriate property, valued in excess of \$950, to wit, personal meals, groceries,  
24 entertainment, electronics, household items, and services purchased with FSC funds, the  
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1 property of the Fire Safe Council of Nevada County, who had entrusted him/her with said  
2 property, a felony.

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4 **ENHANCEMENT**

5 **PC12022.6(A)(1): Special Allegation-Great Monetary Value Over \$50,000**

6 It is further alleged as to Count 4 that in the commission of the above offense(s) the said  
7 defendants, CHRISTOPHER MICHAEL WACKERLY AND JAMIE JONES, with the intent to do  
8 so, took, damaged, and destroyed property of a value exceeding \$50,000, within the meaning  
9 of Penal Code section 12022.6(a)(1).

10 **COUNT V**

11 On or about August 1, 2019 to June 30, 2022, in the County of Nevada, State of California, the  
12 crime of Fraudulent Receipt Of Health Care Aid in violation of WI14014(a), a Felony, was  
13 committed in that JAMIE JONES did unlawfully receive health care for which he/she was not  
14 eligible on the basis of a false declaration as to his/her eligibility, for which care an amount of  
15 money in excess of \$950 was paid on his/her behalf.

16 **COUNT VI**

17  
18 On or about the dates of August 1, 2019 to June 30, 2022 in the County of Nevada, State of  
19 California, the crime of Perjury By Declaration in violation of PC118(a), a felony, was  
20 committed in that JAMIE JONES did unlawfully, under penalty of perjury, declare as true, that  
21 which was known to be false, to wit: monthly income and that she lived separately from  
22 Christopher Wackerly.  
23 2-3-4 County Jail

1 **COUNT VII**

2 On or about August 1, 2019 to June 30, 2022 in the County of Nevada, State of California, the  
3 crime of Fraudulent Receipt Of Health Care Aid in violation of WI14014(a), a Felony, was  
4 committed in that CHRISTOPHER MICHAEL WACKERLY did unlawfully receive health care  
5 for which he/she was not eligible on the basis of a false declaration as to his/her eligibility, for  
6 which care an amount of money in excess of \$950 was paid on his/her behalf.

7 **COUNT VIII**

8 On or about or in between, August 1 2019 and June 30, 2022, in the County of Nevada, State  
9 of California, the crime of Perjury By Declaration in violation of PC118(a), a Felony, was  
10 committed in that CHRISTOPHER MICHAEL WACKERLY did unlawfully, under penalty of  
11 perjury, declare as true, that which was known to be false, to wit: monthly income and that he  
12 was the only member of his household.

13 **COUNT IX**

14 On or about and in between December 1, 2018 and August 27, 2019, in the County of Nevada,  
15 State of California, the crime of Aid By Misrepresentation in violation of WI10980(c)(2), a  
16 Felony, was committed in that JAMIE JONES AND CHRISTOPHER MICHAEL WACKERLY  
17 did willfully, unlawfully and knowingly with the intent to deceive by means of false statements,  
18 representations, failure to disclose a material fact, and other fraudulent device, obtain and  
19 retain aid for Jamie Jones, not in fact entitled thereto, in excess of Nine Hundred Fifty Dollars  
20 (\$950.00), to wit: \$1134.

21 **COUNT X**

22 On or about May 1, 2024, in the County of Nevada, State of California, the crime of  
23 Unemployment Insurance Fraud in violation of UI2101(a), a Felony, was committed in that  
24

1 JAMIE JONES did willfully and unlawfully make a false statement and representation and did  
2 knowingly fail to disclose a material fact to obtain, increase, reduce and defeat a benefit and  
3 payment of unemployment insurance benefits, pursuant to subsection (1) of this Section,  
4 involving the following claim numbers and claimant, to wit:R100000172887652, Jamie Jones..

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6 **ENHANCEMENT**

7 PC12022.6(A)(1): Special Allegation-Great Monetary Value Over \$50,000

8 It is further alleged as to Count 10 that in the commission of the above offenses the said  
9 defendant, JAMIE JONES, with the intent to do so, took, damaged, and destroyed property of  
10 a value exceeding \$50,000, within the meaning of Penal Code section 12022.6(a)(1).

11 **COUNT XI**

12 On or about May 23, 2024, in the County of Nevada, State of California, the crime of Perjury  
13 By Declaration in violation of PC118(a), a Felony, was committed in that JAMIE JONES did  
14 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:  
15 that she was disabled and unable to work and that she was not working for or receiving  
16 compensation from the Fire Safe Council of Nevada County.

17 **COUNT XII**

18 On or about April 16, 2024, in the County of Nevada, State of California, the crime of Forgery  
19 Not Relating To A Check, Bond, Bank Bill, Note, Or Money Order in violation of PC470(b), a  
20 Felony, was committed in that JAMIE JONES with the intent to defraud, counterfeited and/or  
21 forged the seal or handwriting of another, and that forgery related to an item other than a  
22 check, bond, bank bill, note, cashier's check, traveler's check, or money order, specifically, the  
23 name of Isabel Maggiani on an affidavit from the Fire Safe Council of Nevada County  
24 submitted to the California Employment Development Department.

1 **COUNT XIII**

2 On or about and in between March 15, 2024 and March 15, 2025, in the County of Nevada,  
3 State of California, the crime of Unemployment Insurance Fraud in violation of UI2101(a), a  
4 Felony, was committed in that CHRISTOPHER MICHAEL WACKERLY did willfully and  
5 unlawfully make a false statement and representation and did knowingly fail to disclose a  
6 material fact to obtain, increase, reduce and defeat a benefit and payment of unemployment  
7 insurance benefits, pursuant to subsection (1) of this Section, involving the following claim  
8 numbers and claimant, to wit: Christopher Wackerly.

9 **ENHANCEMENT**

10 PC12022.6(A)(1): Special Allegation-Great Monetary Value Over \$50,000

11 It is further alleged as to Count 13 that in the commission of the above offenses the said  
12 defendant, CHRISTOPHER WACKERLY, with the intent to do so, took, damaged, and  
13 destroyed property of a value exceeding \$50,000, within the meaning of Penal Code section  
14 12022.6(a)(1).

15 **COUNT XIV**

16 On or about May 23, 2024, in the County of Nevada, State of California, the crime of Perjury  
17 By Declaration in violation of PC118(a), a Felony, was committed in that CHRISTOPHER  
18 MICHAEL WACKERLY did unlawfully, under penalty of perjury, declare as true, that which was  
19 known to be false, to wit: that he was disabled and unable to work and that he was not working  
20 or receiving compensation from the Fire Safe Council of Nevada County.

21 **COUNT XV**

22  
23 On or about April 16, 2024, in the County of Nevada, State of California, the crime of Forgery  
24 Not Relating To A Check, Bond, Bank Bill, Note, Or Money Order in violation of PC470(b), a  
25 Felony, was committed in that CHRISTOPHER MICHAEL WACKERLY with the intent to

1 defraud, counterfeited and/or forged the seal or handwriting of another, and that forgery related  
2 to an item other than a check, bond, bank bill, note, cashier's check, traveler's check, or money  
3 order, specifically, the name of Isabel Maggiani on an affidavit from the Fire Safe Council of  
4 Nevada County submitted to the California Employment Development Department.

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6 **COUNT XVI**

7 On or about March 29, 2025, in the County of Nevada, State of California, the crime of  
8 Committing Mortgage Fraud with Intent to Defraud in violation of PC532(f), a Felony, was  
9 committed in that JAMIE JONES AND CHRISTOPHER MICHAEL WACKERLY with intent to  
10 defraud, deliberately made a or used or facilitated the use of any misstatement,  
11 misrepresentation, or omission, with the intention that it be relied on by a mortgage lender,  
12 borrower, or any other party to the mortgage lending process to wit, current employment  
13 status, monthly income, false Fire Safe Council of Nevada County paystubs, altered MVB  
(Credit Karma) bank statements.

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15 **COUNT XVII**

16 On or about March 29, 2025, in the County of Nevada, State of California, the crime of Forgery  
17 By Passing or Attempting to Use Forged Document in violation of PC470(d), a felony, was  
18 committed in that JAMIE JONES AND CHRISTOPHER MICHAEL WACKERLY, with the intent  
19 to defraud, made or altered, or passed or attempted to pass as true and genuine, a false  
20 receipt for money or property, check, bond, bank bill, or note, draft, or other document listed in  
21 PC470(d) to wit, false Fire Safe Council of Nevada County paystubs, altered MVB (Credit  
Karma) bank statements.

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23 **COUNT XVIII**

24 On or about May 7, 2024, in the County of Nevada, State of California, the crime of Money  
25 Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES AND

1 CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
2 transaction involving a monetary instrument or instruments of a value exceeding \$5000  
3 through a financial institution knowing that the monetary instrument represented the proceeds  
4 of, or was derived directly or indirectly from the proceeds of, criminal activity.

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6 **COUNT XIX**

7 On or about June 10, 2024, in the County of Nevada, State of California, the crime of Money  
8 Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES AND  
9 CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
10 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
11 through a financial institution knowing that the monetary instrument represented the proceeds  
12 of, or was derived directly or indirectly from the proceeds of, criminal activity.

13 **COUNT XX**

14 On or about July 18, 2024, in the County of Nevada, State of California, the crime of Money  
15 Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES AND  
16 CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
17 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
18 through a financial institution knowing that the monetary instrument represented the proceeds  
19 of, or was derived directly or indirectly from the proceeds of, criminal activity.

20 **COUNT XXI**

21 On or about August 15, 2024, in the County of Nevada, State of California, the crime of Money  
22 Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES AND  
23 CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
24 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
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1 through a financial institution knowing that the monetary instrument represented the proceeds  
2 of, or was derived directly or indirectly from the proceeds of, criminal activity.

3  
4 **COUNT XXII**

5 On or about August 29, 2024, in the County of Nevada, State of California, the crime of Money  
6 Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES AND  
7 CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
8 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
9 through a financial institution knowing that the monetary instrument represented the proceeds  
10 of, or was derived directly or indirectly from the proceeds of, criminal activity.

11 **COUNT XXIII**

12 On or about October 10, 2024, in the County of Nevada, State of California, the crime of  
13 Money Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES  
14 AND CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
15 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
16 through a financial institution knowing that the monetary instrument represented the proceeds  
17 of, or was derived directly or indirectly from the proceeds of, criminal activity.

18 **COUNT XXIV**

19 On or about November 11, 2024, in the County of Nevada, State of California, the crime of  
20 Money Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES  
21 AND CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
22 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
23 through a financial institution knowing that the monetary instrument represented the proceeds  
24 of, or was derived directly or indirectly from the proceeds of, criminal activity.

1 **COUNT XXV**

2 On or about December 9, 2024, in the County of Nevada, State of California, the crime of  
3 Money Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES  
4 AND CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
5 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
6 through a financial institution knowing that the monetary instrument represented the proceeds  
7 of, or was derived directly or indirectly from the proceeds of, criminal activity.

8 **COUNT XXVI**

9 On or about December 23, 2024, in the County of Nevada, State of California, the crime of  
10 Money Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES  
11 AND CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
12 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
13 through a financial institution knowing that the monetary instrument represented the proceeds  
14 of, or was derived directly or indirectly from the proceeds of, criminal activity.

15 **COUNT XXVII**

16 On or about September 12, 2024, in the County of Nevada, State of California, the crime of  
17 Money Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES  
18 AND CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
19 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
20 through a financial institution knowing that the monetary instrument represented the proceeds  
21 of, or was derived directly or indirectly from the proceeds of, criminal activity.

22 **COUNT XXVIII**

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1 On or about May 23, 2024, in the County of Nevada, State of California, the crime of Money  
2 Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES AND  
3 CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
4 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
5 through a financial institution knowing that the monetary instrument represented the proceeds  
6 of, or was derived directly or indirectly from the proceeds of, criminal activity.

7 **COUNT XXIX**

8 On or about August 1, 2024, in the County of Nevada, State of California, the crime of Money  
9 Laundering in violation of PC186.10(a), a Felony, was committed in that JAMIE JONES AND  
10 CHRISTOPHER MICHAEL WACKERLY did unlawfully conduct or attempt to conduct a  
11 transaction involving a monetary instrument or instruments of a value exceeding \$5,000  
12 through a financial institution knowing that the monetary instrument represented the proceeds  
13 of, or was derived directly or indirectly from the proceeds of, criminal activity.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on April 29, 2026, at Nevada City, Nevada County, California.

16  
17 Date: April 29, 2026

18 JESSE WILSON  
19 District Attorney

20 By:



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23 Jesse Wilson  
24 District Attorney

**NOTICE.**

**PLEASE TAKE NOTICE THAT COUNSEL FOR THE PEOPLE HEREBY  
MAKE AN INFORMAL DEMAND FOR DISCOVERY (PURSUANT TO  
PENAL CODE SECTION 1054.3) WITHIN FIFTEEN DAYS.**

DA#: 05724-011803

Agency: NCDA

Report #: 24-DAI-33

JW/iss

