## Affidavit in Support of a Criminal Complaint

Your affiant, David Ablondi, being duly sworn, does hereby state as follows:

- Your Affiant is a Deputy United States Marshal and Criminal Investigator with the United States Marshals Service (USMS). I have been employed as a Deputy U.S. Marshal for nine years.
- 2. The facts set forth in this affidavit are based upon my investigation to date, including information and statements obtained from other individuals a Special Agent of the Federal Bureau of Investigation, a Special Agent of the United States Secret Service, and several Court Security Officers, who have personal knowledge of the events and circumstances described herein. The affidavit is submitted for the limited purpose of establishing probable cause in support of this application for a criminal complaint, and thus it does not contain every fact known by me or the United States.
- This affidavit is made in support of a criminal complaint charging Raymond V.
   Jones, with forcibly assaulting a federal officer while engaged in and on account of the performance of his official duties.

## **Summary of Probable Cause**

4. On or about June 11, 2008, a grand jury in the District of Maryland returned an indictment charging eight defendants, including Jennifer McCall, a/k/a Jennifer Jones, with conspiracy to commit mail fraud, in violation of 18 U.S.C. § 1349; mail fraud, in violation of 18 U.S.C. § 1341; money laundering, in violation of 18 U.S.C. § 1957; and aiding and abetting, in violation of 18 U.S.C. § 2. The indictment also sought forfeiture of property pursuant to 28 U.S.C. § 2461, 18 U.S.C. § 981, 21 U.S.C. § 853. The indictment related to a mortgage fraud scheme involving several entities, particularly Metropolitan Money Store ("MMS"), a Maryland

corporation which did business in Maryland, Virginia, and the District of Columbia and offered to financially distressed homeowners foreclosure consultation and credit services, including its "Foreclosure Reversal Program." MMS was located in Lanham, Maryland, employed 35 individuals, and was not a licensed mortgage broker or credit repair business. Defendant Jennifer McCall ("J. McCall"), a Maryland resident, was the chief executive officer ("CEO") of MMS and a director and the resident agent of MMS and other entities. She was a Maryland licensed mortgage broker and notary but was not licensed to provide credit repair.

- The case against McCall and her codefendants was assigned to Judge Roger W.
   Titus and docketed as Criminal No. RWT-08-0288.
- 6. On or about December 18, 2008, Jennifer McCall pleaded guilty before Judge Titus to conspiracy to commit mail fraud, in violation of 18 U.S.C. § 1349. A sentencing hearing was scheduled for November 16, 2009 at 2:00 p.m. before Judge Titus.
- 7. At the hearing, the United States was represented by Assistant United States
  Attorneys James A. Crowell IV and Christen Sproule. Both Assistant United States Attorneys
  were officers and employees of the United States, engaged in the performance of official duties,
  within the meaning of 18 U.S.C. § 1114.
- 8. At the end of the hearing, at approximately 2:20 p.m. in Courtroom 2C of the United States Courthouse located at 6500 Cherrywood Lane in Greenbelt, Maryland, an individual later identified as Raymond V. Jones, Jennifer McCall's son, leapt out of the gallery into the well of the courtroom, where he assaulted AUSA Crowell by striking him one time in the head with a closed fist. After struggling with Court Security Officers, Jones was subdued and handcuffed.



9. As a result of the assault, AUSA Crowell sustained bodily injury.

## Conclusion

10. Based on the evidence summarized above, your affiant submits that there is probable cause to establish that on or about November 16, 2009, in the District of Maryland, defendant Raymond V. Jones did forcibly assault, impede, intimidate and interfere with a person designated in 18 U.S.C. § 1114 while engaged in and on account of the performance of his official duties, and in the commission of such acts did inflict bodily injury, in violation of 18 U.S.C. § 111(a)(1) and (b).

David Ablondi

Deputy United States Marshal

**USMS** 

Sworn to and subscribed before me on November \$\sigma\_{\infty}^{\infty} 2009.

William Connelly

United States Magistrate Judge