

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:21-cr-69-RJJ

v.

JEMAR AHTON MASON,  
DAVID KURBANOV,  
DENNIS LYNN CARTWRIGHT, JR.,  
ANDRE JACKSON, and  
JAMES WILLIAMS.

SUPERSEDING  
INDICTMENT  
PENALTY SHEET

Defendants.

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**JEMAR AHTON MASON**

**COUNT 1 - Conspiracy to Commit Wire Fraud - 18 U.S.C. §§ 1349 & 1343**

**COUNT 2 - Wire Fraud - 18 U.S.C. § 1343**

Maximum penalty: Not more than 20 years and/or \$250,000 fine [18 U.S.C. § 1343]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**COUNT 3 – Conspiracy to Commit Concealment Money Laundering - 18 U.S.C. § 1956(h)**

Maximum penalty: Not more than 20 years' imprisonment and a fine of \$500,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**COUNTS 4 & 5 – Attempting to Engage in a Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting - 18 U.S.C. §§ 1957 & 2**

Maximum penalty: Not more than 10 years' imprisonment and a fine of \$250,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**Forfeiture**

**DAVID KURBANOV**

**COUNT 1 - Conspiracy to Commit Wire Fraud - 18 U.S.C. §§ 1349 & 1343**

**COUNT 2 - Wire Fraud - 18 U.S.C. § 1343**

Maximum penalty: Not more than 20 years and/or \$250,000 fine [18 U.S.C. § 1343]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

Other: Removal, denial of citizenship and/or denial of admission to the United States in the future

**COUNT 3 – Conspiracy to Commit Concealment Money Laundering - 18 U.S.C. § 1956(h)**

Maximum penalty: Not more than 20 years' imprisonment and a fine of \$500,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

Other: Removal, denial of citizenship and/or denial of admission to the United States in the future

**COUNTS 4 & 5 – Attempt to Engage in a Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting - 18 U.S.C. §§ 1957 & 2**

**COUNT 7 – Engaging in a Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting - 18 U.S.C. §§ 1957 & 2**

Maximum penalty: Not more than 10 years' imprisonment and a fine of \$250,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

Other: Removal, denial of citizenship and/or denial of admission to the United States in the future

**Forfeiture**

**DENNIS LYNN CARTWRIGHT, JR.**

**COUNT 3 – Conspiracy to Commit Concealment Money Laundering - 18 U.S.C. § 1956(h)**

Maximum penalty: Not more than 20 years' imprisonment and a fine of \$500,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**COUNT 8 – Engaging in a Monetary Transaction in Property Derived from Specified Unlawful Activity - 18 U.S.C. § 1957**

Maximum penalty: Not more than 10 years' imprisonment and a fine of \$250,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**COUNTS 9 & 10 - Wire Fraud - 18 U.S.C. § 1343**

Maximum penalty: Not more than 20 years and/or \$250,000 fine [18 U.S.C. § 1343]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**Forfeiture**

**ANDRE JACKSON**

**COUNT 1 - Conspiracy to Commit Wire Fraud - 18 U.S.C. §§ 1349 & 1343**

**COUNT 2 - Wire Fraud - 18 U.S.C. § 1343**

Maximum penalty: Not more than 20 years and/or \$250,000 fine [18 U.S.C. § 1343]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**COUNT 3 – Conspiracy to Commit Concealment Money Laundering - 18 U.S.C. § 1956(h)**

Maximum penalty: Not more than 20 years' imprisonment and a fine of \$500,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**COUNT 4 – Attempting to Engage in a Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting - 18 U.S.C. §§ 1957 & 2**

Maximum penalty: Not more than 10 years' imprisonment and a fine of \$250,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**Forfeiture**

**JAMES WILLIAMS**

**COUNT 1 - Conspiracy to Commit Wire Fraud - 18 U.S.C. §§ 1349 & 1343**

**COUNT 2 - Wire Fraud - 18 U.S.C. § 1343**

Maximum penalty: Not more than 20 years and/or \$250,000 fine [18 U.S.C. § 1343]

Supervised Release: Not more than 5 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**COUNT 3 – Conspiracy to Commit Concealment Money Laundering - 18 U.S.C. § 1956(h)**

Maximum penalty: Not more than 20 years' imprisonment and a fine of \$500,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**COUNT 6 – Attempting to Engage in a Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting - 18 U.S.C. § 1957**

Maximum penalty: Not more than 10 years' imprisonment and a fine of \$250,000 or twice the value of the monetary instruments or funds involved, whichever is greater [18 U.S.C. § 1956(a)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

Special Assessment: \$100 [18 U.S.C. § 3013]

Restitution: [18 U.S.C. § 3663; Mandatory 18 U.S.C. § 3663A]

**Forfeiture**

Date: August 6, 2021

*/s/ Jonathan Roth*  
Counsel for the United States

Submitted in accordance with Admin Order 17-MS-046