

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2015 FEB 19 PM 2:26

ORIGINAL

DEPUTY CLERK

NT

UNITED STATES OF AMERICA

v.

JEREMY WIGGAINS

Criminal No.

**3-15CR-064-L**

INDICTMENT

The Grand Jury charges:

Introduction

**A. Background**

At all times material to this indictment:

1. The defendant, **Jeremy Wiggains**, owned and operated Straight Line Automotive Group ("SLAG") in Dallas, Texas.
2. SLAG advertised itself as an exotic and high-end pre-owned auto dealer servicing potential customers worldwide via the internet.
3. SLAG maintained a line of credit or "floor-plan" through State Bank & Trust Co., which was an insured depository institution with the FDIC.

**B. The Purpose of the Scheme and Artifice**

4. From at least May 3, 2013, and continuing to on or about July 14, 2013, the defendant, **Jeremy Wiggains**, devised and intended to devise a scheme and artifice to defraud State Bank & Trust Co. by obtaining money through materially false and fraudulent pretenses and representations.

### **C. The Scheme and Artifice to Defraud**

5. It was part of the scheme and artifice to defraud that **Jeremy Wiggains** would sell vehicles to Park Place Motors that SLAG had accepted as “trade-in” during the course of SLAG’s business. However, SLAG would continue to keep the vehicle in SLAG’s inventory, even after depositing Park Place Motors’ payment.

6. It was further part of the scheme and artifice to defraud that **Jeremy Wiggains** would have his salespersons market and sell the inventory that he had already sold to Park Place Motors. After finding a potential buyer, SLAG would negotiate and sell the vehicles to general public.

7. It was further part of the scheme and artifice to defraud that **Jeremy Wiggains** would obtain “floor-plan” financing from State Bank & Trust Co. for the vehicles SLAG had already sold to bona fide third-party purchasers. Essentially, allowing SLAG to get paid for these vehicles three different times: (1) from the sale to Park Place Motors; (2) from the sale to a bona fide third-party purchaser; and (3) from the “floor-plan” financing.

Counts One through TwoBank Fraud  
(Violation of 18 U.S.C. § 1344)

8. The Grand Jury realleges and incorporates by reference the allegations contained in the Introduction to this indictment as if fully set forth.

9. On or about the dates set forth below for each count listed below, in the Dallas Division of the Northern District of Texas, the defendant, **Jeremy Wiggains**, devised a scheme and artifice to defraud the financial institution listed below to obtain moneys, funds, credits, assets, securities, or other property owned by or under the custody or control of the financial institution listed below, by means of materially false or fraudulent pretenses, representations, or promises, as described in each count below:

Count	Approximate Dates	Financial Institution	Materially False or Fraudulent Act
One	May 3, 2013 – June 20, 2013	State Bank & Trust Co. (member of FDIC)	<b>Jeremy Wiggains</b> floor-plans a 2008 Ferrari 430 (VIN# ending in 4331) for approximately \$170,000 with State Bank & Trust Co. on June 20, 2013, after having sold this vehicle to B.P. on or about May 13, 2013.
Two	May 15, 2013 – June 25, 2013	State Bank & Trust Co. (member of FDIC)	<b>Jeremy Wiggains</b> floor-plans a 2013 Aston Martin Vantage (VIN# ending in 7387) for approximately \$128,000 with State Bank & Trust Co. on June 25, 2013, after having sold this vehicle to B.P. on or about May 16, 2013.

10. All in violation of 18 U.S.C. § 1344.

Forfeiture Notice  
(18 U.S.C. § 982(a)(1)(C) and 28 U.S.C. § 2461(c))

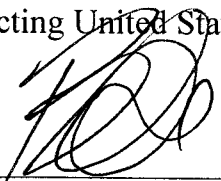
Upon conviction for the offense alleged in Count One and Two of this indictment and pursuant to 18 U.S.C. § 982(a)(2), the defendant, **Jeremy Wiggains**, shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds traceable to the offense. This property, includes, but is not limited to, the following:

1. The proceeds obtained as a result of the offense, in the form of a money judgment.

A TRUE BILL:

  
FOREMAN

JOHN R. PARKER  
Acting United States Attorney

  
BRIAN D. POE  
Assistant United States Attorney  
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DALLAS DIVISION

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**3-15 CR-064-L**

INDICTMENT

18 U.S.C. § 1344

Bank Fraud

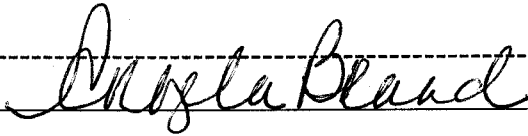
18 U.S.C. § 982(a)(1)(C) and 28 U.S.C. § 2461(c)

Forfeiture Notice

2 Counts

A true bill rendered

DALLAS

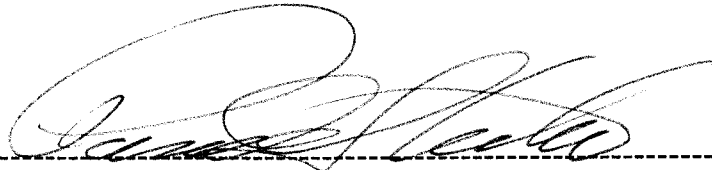


FOREPERSON

Filed in open court this 17 day of February, 2015.

Clerk

Warrant to be Issued



UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Criminal matter pending