

U.S. DISTRICT COURT
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

~~2016 JUN 28 P 5:00~~

UNITED STATES OF AMERICA,
Plaintiff,

JON W. SANFILIPPO
CLERK

v.

Case No. 16-CR-

16-CR-105

JEREMY J. NEUMANN,

[18 U.S.C. §§ 844(i), 1001 and 1341]

(Green Bay Division)

Defendant.

INDICTMENT

COUNT ONE

Arson of Building Used in Interstate Commerce

THE GRAND JURY CHARGES:

That on or about November 6, 2015, in the State and Eastern District of Wisconsin,

JEREMY J. NEUMANN

did maliciously damage by means of fire, a building located at 640 Leeward Court West,
Oshkosh, Wisconsin, which building was used in interstate commerce.

All in violation of Title 18, United States Code, Section 844(i).

COUNT TWO**Mail Fraud****THE GRAND JURY FURTHER CHARGES:**

1. Beginning in approximately July 2015 and continuing to February 2016, in the State and Eastern District of Wisconsin,

JEREMY J. NEUMANN

knowingly devised and participated in a scheme to defraud State Farm Fire and Casualty Company (State Farm) by means of material, false, and fraudulent pretenses and representations.

2. At all times relevant to this Indictment, (a) Jeremy Neumann was the primary owner and operator of Gambit McDermott, LLC, a business leasing warehouse storage space located at 640 Leeward Court West, Oshkosh, Wisconsin; (b) Neumann insured the contents of his business property located at that address through a policy issued by State Farm; and (c) the State Farm policy provided a limit of \$130,000 for business contents.

The Scheme to Defraud State Farm Insurance

3. The essence of the scheme was to intentionally set fire to the building containing business property, as alleged in Count One of this indictment, and falsely claim that the fire was accidental and not originating from any act or procurement by Neumann, in order to obtain insurance proceeds based on the material false and fraudulent claims.

Execution of the Scheme to Defraud

4. For the purpose of executing the scheme to defraud and attempting to do so, Neumann caused a business property loss claim to be delivered by U.S. mail to State Farm, Phoenix, Arizona, from Appleton, Wisconsin, on or about January 7, 2016, in the Eastern District of Wisconsin.

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT THREE**False Statement****THE GRAND JURY FURTHER CHARGES:**

1. That on or about November 7, 2015, in the State and Eastern District of Wisconsin,

JEREMY J. NEUMANN,

in a matter within the jurisdiction of the executive branch of the government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements.

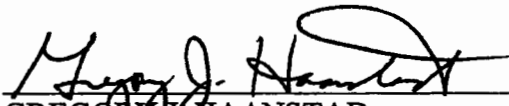
2. Specifically, during an arson investigation being conducted by the United States Bureau of Alcohol, Tobacco, Firearms and Explosives, Neumann falsely stated to law enforcement that he drove his vehicle directly to a casino in Green Bay after stopping at a gas station near his residence when in truth he traveled from the gas station to his business arriving shortly before the fire was detected.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:


FOREPERSON

Dated: 06-28-2016


GREGORY J. HAANSTAD
United States Attorney