

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JONATHAN LOADHOLT,

Defendant.

SUPERSEDING INFORMATION

S2 24 Cr. 670 (LJL)

COUNT ONE
(Stalking)

The United States Attorney charges:

1. From at least in or about December 2023, up to and including in or about November 2024, in the Southern District of New York and elsewhere, JONATHAN LOADHOLT, the defendant, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person (“Victim-1”), did use an interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that would be reasonably expected to cause substantial emotional distress to that person, to wit, in exchange for payment, LOADHOLT on multiple occasions attempted to locate and surveil Victim-1 on behalf of another person who intended to cause Victim-1’s murder, and LOADHOLT used cellphones and electronic messaging applications in furtherance of the scheme.

(Title 18, United States Code, Section 2261A(2)(B).)

COUNT TWO
(Conspiracy to Launder Money)

The United States Attorney further charges:

2. From at least in or about December 2023, up to and including in or about November 2024, in the Southern District of New York and elsewhere, JONATHAN LOADHOLT,

the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agree together and with each other to commit an offense against the United States, to wit, money laundering, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

3. It was a part and object of the conspiracy that JONATHAN LOADHOLT, the defendant, and others known and unknown, would and did transport, transmit, transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States, in amounts exceeding \$10,000, with the intent to promote specified unlawful activity, to wit, trafficking in firearms in violation of Title 18, United States Code, Section 933.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 31, 2024, JONATHAN LOADHOLT, the defendant, and a co-conspirator not named as a defendant herein (“CC-1”), surveilled a residence that LOADHOLT and CC-1 believed to be Victim-1’s residence.

b. On or about March 31, 2024, CC-1 informed a co-conspirator not named as a defendant herein (“CC-2”) that funds previously sent by CC-2 from overseas had been used to purchase, among other things, a firearm.

(Title 18, United States Code, Section 371.)



JAY CLAYTON
United States Attorney