

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA

v.

JOSEPH ALLEN MOORE

§  
§  
§  
§  
§

No. 6:23-CR-00046-JCB-KNM

**ELEMENTS OF OFFENSE**

**Count 1**

Violation: Title 18, United States Code, Section 371 (Conspiracy commit wire fraud, in violation of 18 U.S.C. § 1343)

Penalty: A fine of not more than \$250,000.00; imprisonment for not more than five (5) years, or both; a period of supervised release for not more than three (3) years; a special assessment of \$100.00.

The Defendant is charged in Count 1 of the Information with conspiracy to commit wire fraud in violation of 18 U.S.C. § 1343, in violation of 18 U.S.C. § 371.

The essential elements which must be proven to establish a violation of this offense are:

***First:*** That the defendant and at least one other person made an agreement to commit the crime of wire fraud in violation of 18 U.S.C. § 1343;

***Second:*** That the defendant knew the unlawful purpose of the agreement and

joined in it willfully, that is, with the intent to further the unlawful purpose; and

**Third:** That at least one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the indictment, in order to accomplish some object or purpose of the conspiracy.<sup>1</sup>

Respectfully submitted,

BRIT FEATHERSTON  
UNITED STATES ATTORNEY

/s/ Alan R. Jackson  
ALAN R. JACKSON  
Assistant U.S. Attorney  
110 N. College, Suite 700  
Tyler, Texas 75702  
Texas Bar No. 10453300  
(903) 590-1400  
alan.jackson@usdoj.gov

CERTIFICATE OF SERVICE

On April 13, 2023, I, Alan R. Jackson, Assistant U. S. Attorney for the Eastern District of Texas, do hereby certify that a true and correct copy of the foregoing instrument has been served on the following according to the Federal Rules of Criminal Procedure and the rules of this Court: Mr. Jeff Wood, Attorney for Defendant.

/s/ Alan R. Jackson  
ALAN R. JACKSON

---

<sup>1</sup>Fifth Circuit Pattern Jury Instructions (Criminal), 2.15A, p. 163 (2019)