

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

UNITED STATES OF AMERICA :
 :
 v. : **CRIMINAL NO. 4:26-CR- 8 (CDL)**
 :
 : **VIOLATIONS:**
 CHRISTOPHER SAMUEL JONES :
 :

THE GRAND JURY CHARGES:

INTRODUCTION

1. The City of Fort Gaines, Georgia, is a city in and the county seat of Clay County, Georgia and is located within the Columbus Division of the Middle District of Georgia.
2. The city's western border is the Chattahoochee River.
3. The Chattahoochee River spans about 430 miles in Georgia and Florida. It is a tributary of the Apalachicola River which ultimately empties into the Gulf of America f/k/a Gulf of Mexico¹ at Apalachicola Bay.
4. The Federal Water Pollution Act a/k/a The Clean Water Act (CWA), 33 U.S.C. § 1251, *et seq.* was enacted by Congress to restore and maintain the chemical, physical and biological quality of the nation's waters; to prevent, reduce and eliminate water pollution; and to conserve, protect and ensure the propagation of fish and aquatic life and wildlife in the United States. The CWA regulates, among other things, the operation of publicly owned treatment works (POTWs) by municipal governments. Domestic, commercial and industrial wastewater is delivered to POTWs through sewer systems. After treating the

¹ On January 20, 2025, Donald Trump signed Executive Order 14172 officially renaming the Gulf of Mexico to the Gulf of America.

incoming wastewater, a POTW discharges the treated wastewater into a receiving waterway.

5. The City of Fort Gaines, Georgia operates a POTW located on Troupe Street in Fort Gaines, the effluent of which discharges into the Chattahoochee River. The City of Fort Gaines is authorized by its permit to discharge treated wastewater from the City POTW into the Chattahoochee River as long as the effluent is within the parameters of the permit. The Chattahoochee River is a water of the United States as that term is used in the CWA. Waters of the United States is defined to include intrastate lakes, rivers and streams including intermittent streams and wetlands, the use, degradation or destruction of which would or could affect interstate or foreign commerce. 40 C.F.R. §§ 120.2, 122.2.
6. The United States Environmental Protection Agency (EPA) is an agency of the United States government responsible for carrying out federal laws and regulations related to the protection of human health and the environment, including the CWA.
7. The Georgia Environmental Protection Division (GAEPD) in some instances is delegated to receive information on behalf of EPA and to assist it in the issuance of permits for POTWs.
8. The CWA generally requires a permit for all discharges of pollutants from point sources to waters of the United States. Such permits are issued under the National Pollutant Discharge Elimination System (NPDES). Except in compliance with such a permit, the discharge of any pollutant by any person is unlawful. The NPDES permitting program was delegated to GAEPD by EPA on June 28, 1974 (39 Fed. Reg. 26061). At all times pertinent to the indictment, the City of Fort Gaines POTW was operating under NPDES permit effective May 1, 2021. The permit set forth effluent limitations on the POTW's

discharge into the Chattahoochee River at its outfall point. The permit also required regular testing to demonstrate compliance. The results of the required testing were to be accurately reported to the GAEPD and EPA via a Discharge Monitoring Report (DMR).

9. The Defendant, Christopher Samuel Jones, created a business which he called Jones Water and Wastewater Consulting (JWWC). JWWC and Defendant Jones entered into an agreement whereby Jones acted on behalf of the City of Fort Gaines' POTW as its operator. In this capacity, Jones was responsible for ensuring compliance with the permit and for accurately reporting testing results on the required DMR.
10. The term pollutant is broadly defined under the CWA to include sewage, sewage sludge, biological materials, and municipal waste discharged into water. 33 U.S.C. § 1362(6).
11. The NPDES permit requires that the effluent from the POTW contain less than 200 colonies of fecal coliform bacteria per 100 milliliters of effluent per month and 400 colonies of fecal coliform bacteria per 100 milliliters of effluent per week.
12. The coliform samples must be analyzed by a laboratory certified by GAEPD or EPA. Coliform bacteria come from the feces of warm-blooded animals. If water is contaminated with coliform bacteria, the person consuming the water can become sick with nausea and vomiting.
13. As with other environmental statutes, the effectiveness and integrity of CWA depend upon truthful and accurate reporting by the regulated community. A statement is material if it has the natural tendency to influence or is capable of influencing or affecting the exercise of a government function. It is imperative that an operator take and report accurate testing results to ensure that the CWA's purposes are carried out. False information materially impairs the enforcement of the CWA and the safety of the waters of the United States because undisclosed violations can lead to unsafe conditions.

COUNT ONE

DISCHARGE OF A POLLUTANT INTO THE WATERS OF THE UNITED STATES

Paragraphs 1-13 of the introduction are incorporated herein by reference.

Between on or about July 8, 2025, and July 9, 2025, in the Columbus Division of the Middle District of Georgia and elsewhere within this Court's jurisdiction, the defendant,

CHRISTOPHER SAMUEL JONES

did knowingly discharge and cause to be discharged a pollutant from a point source into a water of the United States, in violation of a NPDES permit: to wit: Defendant discharged and caused the discharge of effluent into the Chattahoochee River at the Fort Gaines POTW outfall point which far exceeded the acceptable limitation on coliform bacteria. All in violation of Title 33, United States Code, Section 1319(c)(2)(A).

COUNT TWO

FALSE STATEMENT TO A FEDERAL AGENCY

Paragraphs 1-13 of the introduction are incorporated herein by reference.

Between or about July 23, 2025, and August 13, 2025, in the Columbus Division of the Middle District of Georgia and elsewhere within this Court's jurisdiction, the defendant,

CHRISTOPHER SAMUEL JONES

did willfully and knowingly falsify, conceal and cover up a material fact by any trick, scheme and device, did make a materially false, fictitious and fraudulent statement and representation and did make and use a false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by providing false written information to GAEPD acting on behalf of EPA by statutory grant of authority to effectuate the CWA, relevant state law and state and federal regulations, to wit: Defendant Jones

prepared and presented a Discharge Monitoring Report (DMR) which purported that coliform testing had been performed by him and that the results were in compliance with the effluent limitations of the applicable NPDES permit when, in truth and in fact as he then knew, the effluent contained an amount of coliform bacteria well in excess of the permitted amount.

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

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

WILLIAM R. KEYES
UNITED STATES ATTORNEY

Presented by:

Leah E. McEwen

Leah E. McEwen
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 15 day of April 2026.

C. Austin

Deputy Clerk