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6 UNITED STATES DISTRICT COURT
 7 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA)	CRIMINAL NO. 2:14-cr-300
)	
)	<u>Count 1</u> : 18 U.S.C. § 1001(a)(2)
11 v.)	(False Statement)
)	
)	<u>Count 2</u> : 18 U.S.C. § 1623(a)
12 STEPHANIE LIANE MARKHAM,)	(Perjury)
)	
)	<u>Count 3</u> : 18 U.S.C. § 1503
)	(Obstruction of Justice)

16 INDICTMENT

17 INTRODUCTION

18 **THE GRAND JURY CHARGES THAT:**

19 At all times material to this Indictment:

20 GENERAL ALLEGATIONS

21 1. From at least in or about December 2007 through at least in or about January
 22 2013, the Federal Bureau of Investigations (FBI) was investigating crimes of mail fraud and wire
 23 fraud, in violation of 18 U.S.C. § 1341 and § 1343, in relation to a mortgage, home owners
 24 association (HOA), and construction defect litigation fraud schemes. The FBI was investigating
 25 a fraudulent scheme that involved taking over HOAs in the Las Vegas, Nevada area, including,
 26 but not limited to, the HOA at Jasmine Ranch (Jasmine). The investigation into the fraudulent

1 scheme at Jasmine was a material part of the investigation. The Las Vegas HOA investigation
2 and the investigation of Jasmine are within the jurisdiction of the executive branch of the
3 government of the Unites States pursuant to 18 U.S.C. § 1001.

4 2. In or about June 2006, STEPHANIE LIANE MARKAM knowingly became an
5 “owner” of a 1% interest in a unit at Jasmine Ranch and agreed to run for election to the Jasmine
6 HOA Board of Directors (Board) in an attempt to assist her co-conspirators in controlling the
7 Jasmine HOA Board.

8 3. On or about October 9, 2012, MARKHAM was interviewed by law enforcement.
9 In that interview, MARKHAM told law enforcement that she had not heard of Jasmine, was
10 unaware of her ownership interest in a unit at Jasmine, was not involved with any fraudulent
11 scheme in relation to Jasmine, and did not know Co-conspirator A. Law enforcement present at
12 the interview included an FBI Special Agent of the FBI’s Las Vegas, Nevada Office.

13 4. On or about October 9, 2012, MARKHAM testified before a federal grand jury
14 sitting in Las Vegas, Nevada. MARKHAM told the grand jury that she had not heard of Jasmine
15 before the day of her testimony, was unaware of her ownership interest in a unit at Jasmine, was
16 not involved with any fraudulent scheme in relation to Jasmine, and did not know Co-conspirator
17 A. This federal grand jury was a “grand jury of the United States” within the meaning of Title
18 18, United States Code, Section 1623(a) and a grand jury “of any court of the United States”
19 within the meaning of Title 18, United States Code, 1503(a).

20
21 **COUNT ONE**
(False Statement)

22 5. The Grand Jury realleges and incorporates by reference Paragraphs 1 through 4.

23 6. On or about October 9, 2012, in the District of Nevada and elsewhere,

24 **STEPHANIE LIANE MARKHAM**

25 did willfully and knowingly make a materially false, fictitious, and fraudulent statement and
26 representation in a matter within the jurisdiction of the executive branch of the Government of

1 the United States, by telling a FBI Special Agent that she had never heard of Jasmine, was
2 unaware of her ownership interest in a unit at Jasmine, and was not involved with any fraudulent
3 scheme in relation to Jasmine, at the United States District of Nevada courthouse in Las Vegas,
4 Nevada, within the District of Nevada. The statements and representations were false because, as
5 MARKHAM then and there knew, she had had an ownership interest in a unit at Jasmine and
6 was involved in a fraudulent scheme to run for the Jasmine HOA Board in order to benefit her
7 co-conspirators.

8 In violation of Title 18, United States Code, Section 1001(a)(2).

9
10 **COUNT TWO**
(Perjury)

11 7. The Grand Jury realleges and incorporates by reference Paragraphs 1 through 4.

12 8. On or about October 9, 2012, in the District of Nevada and elsewhere,

13 **STEPHANIE LIANE MARKHAM**

14 while under oath and testifying in a proceeding before a Grand Jury of the United States for the
15 District of Nevada, knowingly did make a false material declaration, that is to say:

16 9. At the time and place aforesaid the grand jury was conducting an investigation to
17 determine whether violations of Title 18, United States Code, Section 1343 had been committed,
18 and to identify the persons who had committed, caused the commission of, and conspired to
19 commit such violations. It was material to the said investigation that the grand jury ascertain if
20 MARKHAM had been aware of Jasmine, had been aware of her ownership of a unit in Jasmine,
21 had agreed to run for the Jasmine HOA Board, had been involved in a fraudulent scheme in
22 relation to Jasmine's HOA, and did know Co-Conspirator A.

23 10. At the time and place alleged, MARKHAM, appearing as a witness under oath at
24 a proceeding before the grand jury, knowingly made the following declaration in response to
25 questions with respect to a material matter to the investigation alleged in paragraph 1 as follows:
26

1 "Q. Let me ask you if you were ever an owner of a condo at Jasmine HOA?

2 A. No. I never heard of Jasmine until today."

3 . . .

4 "Q. And were you aware that in June of '06 you had a 1% interest in Condo Unit 2127 at
5 Jasmine HOA?

6 A. No. I had no idea."

7 . . .

8 "Q. And as you sit here now, you have no recollection of ever meeting [Co-conspirator A] or
9 having –

10 A. No.

11 Q. -- conversations with [Co-conspirator A]?

12 A. No recollection of ever meeting or discussing any of this with [Co-conspirator A]."

13

14

15 11. The aforesaid underscored testimony of MARKHAM, as she then and there well
16 knew and believed, was false in that, MARKHAM was aware of Jasmine, knew she had had an
17 ownership interest in a unit at Jasmine, that she was involved in a fraudulent scheme to run for
18 the Jasmine HOA Board in order to benefit her co-conspirators, and that she did know Co-
19 conspirator A.

20 In violation of Title 18, United States Code, Section 1623(a).

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