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IN THE THIRD JUDICIAL DISTRICT COURT
SALT LAKE COUNTY, STATE OF UTAH

STATE OF UTAH,

Plaintiff,

vs.

JALON HANKSTON,

[REDACTED]

[REDACTED]

DOB: [REDACTED]

AG CASE NUMBER 2025-50

Defendant.

JOHNNY ANTANIO HANKSTON,

Co-Defendant.

JOHNNY LEONEL TELLEZ, aka JOHN
TELLEZ, aka DIAMANTE,

Co-Defendant.

INFORMATION

Criminal No.

Judge

THE STATE OF UTAH TO THE ABOVE-NAMED DEFENDANT:

The undersigned Lane Olson, a Lieutenant and Special Agent with the Utah Attorney General's Office, Utah Medicaid Fraud Control Unit, upon a written declaration states on information and belief that the Defendant, JALON HANKSTON, committed the crime of:

COUNT 1

UTAH FALSE CLAIMS ACT, a second-degree felony (2023, as amended), in violation of Utah Code §26B-3-1106(1)(a) and (c), in Salt Lake County, in the State of Utah, from on or about December 01, 2023, through on or about March 14, 2025, Defendant, JALON HANKSTON, as a party to the offense pursuant to Utah Code § 76-2-202, knowingly, intentionally or recklessly, attempted to make or present or caused to be made or presented to an employee or officer of the state a claim for a medical benefit (a) which was wholly or partially false, fictitious, or fraudulent; or (c) which misrepresented the type, quality or quantity of the items or services rendered. The cumulative value of the funds or other benefits received or claimed was over \$5,000.

To wit: From on or about December 01, 2023, through March 14, 2025, Defendant JALON HANKSTON, was a co-owner of Second Chance Family Services. During this time, Jalon submitted claims to Medicaid that were being provided by unqualified individuals and for services that never occurred. The amount of loss to Utah Medicaid exceeded \$5,000.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES: SA Lane Olson, SA Zak Snow, SA Brett DeCow, Chief Auditor Valerie Oman, Data Scientist Sam Vanous, Agent Carolyn Montilla, Jessica Louis, Madison Prado, Mary Udeochu-Ogbonna, J.G., S.C., (initials used to protect the privacy of patients receiving substance abuse treatment), potentially other residents with paid claims.

Pursuant to Utah Code §78B-18a-101 *et seq.*, I declare under criminal penalty of the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 22nd day of June 2026.

/s/ Lane Olson

LT. LANE OLSON

Declarant

Authorized for presentment and filing:
DEREK E. BROWN,
Utah Attorney General

/s/ Anthony Combe

ANTHONY COMBE

Assistant Utah Attorney General

DATED: June 22, 2026

AG Case No. 2025-50