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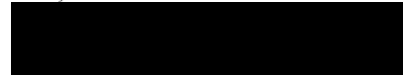
IN THE THIRD JUDICIAL DISTRICT COURT
SALT LAKE COUNTY, STATE OF UTAH

STATE OF UTAH,

Plaintiff,

vs.

JOHNNY LEONEL TELLEZ, aka JOHNNY
LEONEL TELLEZ, III, JOHN TELLEZ, aka
JOHNNY TELLEZ, III, aka DIAMANTE, aka
JOHNNY TELLEZ, aka JOHNNY TELLEZ,
III, aka JOHNNY L. TELLEZ, aka JOHNNY
L TELLEZ, III, aka JOHNNY L. TELLEZ, IV,
aka JUAN TELLEZ, aka JUAN F TELLEZ,
aka JUAN TELLEZ, III, aka K-NINE
TELLEZ, aka KNINE TELLEZ, aka K-NINE,
XX,



DOB: [REDACTED]

AG CASE NUMBER 2025-50

Defendant.

JOHNNY ANTANIO HANKSTON,

Co-Defendant.

JALON HANKSTON,

Co-Defendant.

INFORMATION

Criminal No.
AG Case No. 2025-50
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, JOHNNY LEONEL TELLEZ, aka JOHNNY LEONEL TELLEZ, III, JOHN TELLEZ, aka JOHNNY TELLEZ, III, aka DIAMANTE, aka JOHNNY TELLEZ, aka JOHNNY TELLEZ, III, aka JOHNNY L. TELLEZ, aka JOHNNY L TELLEZ, III, aka JOHNNY L. TELLEZ, IV, aka JUAN TELLEZ, aka JUAN F TELLEZ, aka JUAN TELLEZ, III, aka K-NINE TELLEZ, aka KNINE TELLEZ, aka K-NINE, XX, hereinafter, ("JOHNNY LEONEL TELLEZ") 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 July 01, 2024, through on or about March 14, 2025, Defendant, JOHNNY LEONEL TELLEZ, aided and abetted Co-defendants, JOHNNY ANTANIO HANKSTON and JALON HANKSTON, as parties to the offense pursuant to Utah Code § 76-2-202, to knowingly, intentionally or recklessly, attempt to make or present or cause 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 July 01, 2024, through March 14, 2025, Defendant, JOHNNY LEONEL TELLEZ, while going under the name "Diamante", aided and abetted, Co-Defendants JOHNNY ANTANIO HANKSTON and JALON HANKSTON, who were co-owners of Second

Chance Family Services, to submit false claims to Utah Medicaid. During this time, Defendant assisted Co-defendants in submitting claims to Medicaid that were being provided by unqualified individuals, including Defendant, and caused claims for services to be submitted to Medicaid 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