

S. LANE TUCKER  
United States Attorney

RYAN D. TANSEY  
Assistant U.S. Attorney  
Federal Building & U.S. Courthouse  
101 12<sup>th</sup> Avenue, Room 310  
Fairbanks, Alaska 99701  
Phone: (907) 456-0245  
Fax: (907) 456-0577  
Email: ryan.tansey@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	No. 4:22-cr-00004-RRB-SAO
	)	
Plaintiff,	)	<u>COUNT 1:</u>
	)	CONSPIRACY TO COMMIT BANK
vs.	)	FRAUD AND WIRE FRAUD
	)	Vio. of 18 U.S.C. § 1349
JARED WILKES POST,	)	
a/k/a "JMFP Inc.,"	)	<u>COUNTS 2-12:</u>
"Chris_Taylor68,"	)	BANK FRAUD
"Jaredpost32,"	)	Vio. of 18 U.S.C. § 1344(2)
"Haitian.cowboy," and,	)	
LEVI DYLAN SKULSTAD,	)	<u>COUNTS 13-23:</u>
a/k/a, "Levi Cashino,"	)	WIRE FRAUD
"youngcashino,"	)	Vio. of 18 U.S.C. § 1343
	)	
Defendants.	)	<u>COUNTS 24-28:</u>
	)	AGGRAVATED IDENTITY THEFT
	)	Vio. of 18 U.S.C. § 1028A
	)	
	)	<u>COUNT 29:</u>
	)	CONSPIRACY TO COMMIT MONEY
	)	LAUNDERING
	)	Vio. of 18 U.S.C. §§ 1956(h) and
	)	1956(a)(1)(B)(i) & (ii)
	)	

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- ) COUNTS 30-31:
- ) MONEY LAUNDERING
- ) Vio. of 18 U.S.C. § 1956(a)(1)(B)(i) &
- ) (ii)
- )
- ) CRIMINAL FORFEITURE
- ) ALLEGATION:
- ) Vio. of 18 U.S.C. § 982(a)(2)(A) and
- ) (B), and R. 32.2, Fed. R. Crim. P.
- )

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INDICTMENT

The Grand Jury charges that:

1. At all times relevant to this Indictment, Mt. McKinley Bank, U.S. Bank, Santander Bank, N.A., KeyBank, Citibank, and Wells Fargo Bank were federally chartered financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. At all times relevant to this Indictment, Alaska USA Federal Credit Union (“Alaska USA”) and MAC Federal Credit Union were federally chartered financial institutions, the deposits of which were insured by the National Credit Union Administration.

COUNT 1  
THE CONSPIRACY

3. The allegations above are realleged and incorporated as if fully set forth in this count.

4. Beginning on a date unknown to the Grand Jury, but no later than 2017, and continuing until in or around January 2021, within the District of Alaska and elsewhere,

defendants JARED POST and LEVI SKULSTAD, together with others known and unknown to the Grand Jury, combined, conspired, and agreed with each other to commit certain offenses defined under Title 18, United States Code, Chapter 63, to wit: Bank Fraud, in violation of 18 U.S.C. § 1344(2), and Wire Fraud, in violation of 18 U.S.C. § 1343.

#### OBJECT OF THE CONSPIRACY

5. The object of the conspiracy was to knowingly and with intent to defraud, devise, execute, and attempt to execute a scheme to obtain monies, funds, assets, and other property owned by and in the custody and control of federally insured financial institutions, to wit, Alaska USA Federal Credit Union (“Alaska USA”), Mt. McKinley Bank, U.S. Bank, Santander Bank, N.A., Key Bank, MAC Federal Credit Union, Citibank and Wells Fargo (the “victim banks”), by means of materially false and fraudulent pretenses, representations, and promises; and to devise and execute through the use of the wires in interstate commerce a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts.

#### THE MANNER AND MEANS OF THE CONSPIRACY

6. In furtherance of this conspiracy, and to accomplish its object, the following manners and means were used, among others:

7. POST and SKULSTAD and others would steal mail and checkbooks from victims’ mailboxes, cars, or other locations in Fairbanks, Alaska, or elsewhere, and intercept mail from banks belonging to victims. POST and SKULSTAD would then use

the stolen mail and checkbooks to collect victims' personally identifiable information ("PII"), bank account information, and would fraudulently alter the stolen checks.

8. POST and SKULSTAD would then contact acquaintances or other individuals (which POST and SKULSTAD referred to as "Plays") over Instagram, Facebook or other social media platforms and convince the Plays to provide POST and SKULSTAD with their bank account numbers and online banking login information. POST or SKULSTAD would falsely represent that they would deposit a legitimate check into the Play's bank account and would share the deposited funds with the Play in exchange for use of their bank account.

9. POST and SKULSTAD targeted "Plays" whom they believed to be vulnerable to "scam[s]."

10. POST and SKULSTAD and others known and unknown to the Grand Jury would then access the Play's bank account and deposit and cause to be deposited into the Play's bank accounts checks obtained from victims that POST and SKULSTAD knew were stolen, counterfeit, or fraudulently obtained and altered.

11. POST and SKULSTAD would then transfer, withdraw, or cause to be withdrawn portions of the deposited checks from the Play's bank account (typically ranging from \$1,000 - \$5,000 USD) using an ATM, money service, or PayPal, prior to the bank determining that the deposited check was fraudulent. Defendants referred to this practice as "popping checks."

12. Once the bank determined that the check was fraudulent the deposit would be reversed, causing the Play's bank account to be overdrawn by the amount of the

fraudulent check and causing the bank, Play, or check victim to suffer losses in the amount of the withdrawal or transfers made by POST and SKULSTAD. POST and SKULSTAD would then split the proceeds amongst themselves.

13. POST and SKULSTAD would on occasion solicit “Plays” in-person and enlist them to cash fraudulent checks for POST and SKULSTAD inside a bank. On occasion POST and SKULSTAD would cash fraudulent checks themselves at the bank.

14. POST and SKULSTAD sought to conceal the illegal scheme, including by depositing fraudulent or stolen checks into third party bank accounts (the “Plays” accounts) in amounts below \$10,000 to avoid federal transaction reporting requirements.

15. Through the scheme, POST and SKULSTAD fraudulently obtained or attempted to obtain a total of at least \$500,000 from Alaska USA and other federally insured banking institutions, to which POST and SKULSTAD knew they were not entitled.

#### OVERT ACTS

16. In furtherance of the conspiracy and to effect its illegal object, POST and SKULSTAD committed the following overt acts, among others:

#### R.H.

OA1: On or about August 14, 2017, POST deposited or caused to be deposited a fraudulent \$2,889 check drawn from a Citi Bank account, into an Alaska USA account in “Play” R.H.’s name.

OA2: On or about August 15, 2017, POST transferred a total of \$208.00 from Play R.H.’s Alaska USA bank account, into S.P.’s Alaska USA account. S.P. withdrew the \$208 and gave it to SKULSTAD, per SKULSTAD’s instructions.

OA3: On or about November 13, 2017, SKULSTAD sent a message to POST via Facebook messenger stating: “Bro we about to be so rich lol... hopefully we don’t get irresponsible with the money.” POST replied “never hopefully.”

**S.G.**

OA4: On or about May 6, 2019, POST deposited or caused to be deposited a fraudulent \$650 check drawn from Wells Fargo bank account ending in -2651 in victim G.P.’s name, into U.S. Bank account ending in -6702 in “Play” S.G.’s name.

OA5: On or about May 6, 2019, POST deposited or caused to be deposited a fraudulent \$802 check drawn from Wells Fargo bank account ending in -2651 in victim G.P.’s name, into U.S. Bank account ending in -6702 in “Play” S.G.’s name.

OA6: On or about May 7, 2019, POST deposited or caused to be deposited a fraudulent \$1,343 check drawn from Wells Fargo bank account ending in -5794 in victim G.A.’s name, into U.S. Bank account ending in -6702 in “Play” S.G.’s name.

OA7: On or about May 7, 2019, POST withdrew or caused to be transferred to him three (3) separate online transfers from U.S. Bank account ending in -6702 for a total of \$520 to Venmo account @jaredpost32 as well as a Western Union transfer for several hundred dollars to “Jared Wilkes Post Anchorage Alaska,” resulting in a negative balance of \$1,524.30 in that account. That Venmo account was originally opened and registered to SKULSTAD using his true date of birth and social security number.

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**D.P. and J.B.**

OA8: On or about December 25, 2019, POST requested that SKULSTAD deposit two fraudulent checks into his “Plays” bank accounts. SKULSTAD agreed, writing “I’ll do your accounts ... I literally been eating off the same checks the man has been out of town and I guess hasn’t canceled them lmfao. They keep getting approved....” POST replied “bro I just want my cut. And you do owe me.”

OA9: POST then sent SKULSTAD the names and Alaska USA bank account login information for “Plays,” D.P. and J.B. POST instructed SKULSTAD to “just do a regular mobile deposit,” and SKULSTAD replied “I already deposited into hers man [it] pops on the 26<sup>th</sup>.”

OA10: On or about December 26, 2019, SKULSTAD messaged POST “Ima do the accounts... ima do the kid from tok[‘]s account send me \$700 off the play at least ima do [\$]4,800.” POST agreed, replying “Okay I got you. And after we eat off that kids then [J.B.]?” SKULSTAD replied “yeah.”

**C.M.**

OA11: On or about August 12, 2020, POST deposited or caused to be deposited a fraudulent \$3,882.00 check drawn from Mt. McKinley Bank account ending in –4160 in victim M.Y.’s name, into Alaska USA account ending in -1998 in “Play” C.M.’s name.

OA13: On or about August 13, 2020, POST deposited or caused to be deposited a fraudulent \$4,683.00 check drawn from Mt. McKinley Bank account ending in –4160 in victim M.Y.’s name, into Alaska USA account ending in -1998 in “Play” C.M.’s name.

OA14: On or about August 14, 2020, POST deposited or caused to be deposited a fraudulent \$1,100 check drawn from Mt. McKinley Bank account ending in -4160 in victim M.Y.'s name, into Alaska USA account ending in -1998 in "Play" C.M.'s name.

**B.S.**

OA15: On or about September 3, 2020, POST deposited or caused to be deposited a fraudulent \$4,625 check drawn from MAC Federal Credit Union account ending in -3161 in victim J.H.'s name, into Alaska USA account ending in -3574 in "Play" B.S.'s name.

OA16: On or about September 10, 2020, POST deposited or caused to be deposited a fraudulent \$4,253.71 check drawn from Wells Fargo account ending in -0373 in victim B.H.'s name, into Alaska USA account ending in -3574 in "Play" B.S.'s name.

OA17: On or about September 24, 2020, POST deposited or caused to be deposited a fraudulent \$4,588 check drawn from Mt. McKinley Bank account ending in -9106 in victim J.D.'s name, into Alaska USA account ending in -3574 in "Play" B.S.'s name.

OA18: On or about September 25, 2020, B.S. messaged POST over Instagram and asked "[w]ho deposited the money?" POST replied "I did. Out of that \$4,500 I want \$2,500. 705 Muldoon address. Don't fuck around with peoples bread. I'm not threatening you in any way."

OA19: On or about September 27, 2020, Post messaged B.S. to "send my cut [\$2,500] through Walmart Moneygram or Fred Meyer Western Union."

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**M.G.**

OA20: In or around October 2020, POST obtained Play M.G.'s bank account login information over Snapchat and Instagram by falsely claiming that he would help M.G. by depositing checks into her bank account and splitting the proceeds with her.

OA21: On or about October 12, 2020, POST deposited or caused to be deposited a fraudulent \$5,000 check drawn from Mt. McKinley Bank account ending in -3049 in victim G.W.'s name, into Alaska USA account ending in -2596 in "Play" M.G.'s name.

OA22: On or about October 14, 2020, POST deposited or caused to be deposited a fraudulent \$4,934 check drawn from Alaska USA bank account ending in -1225 in victim A. LLC's name, into Alaska USA account ending in -2596 in "Play" M.G.'s name.

OA23: On or about October 26, 2020, unindicted co-conspirator L.P. and POST cashed or attempted to cash fraudulent checks at Mt. McKinley Bank in Fairbanks, Alaska, for \$1,200 and \$750, which were drawn from Mt. McKinley Bank account ending in -3051 in the name of victim J.W. When contacted by law enforcement about the incident, POST falsely claimed that J.W. had written him the checks for shoveling snow.

OA24: On or about December 15 and 16, 2020, POST and SKULSTAD exchanged messages about the scheme, including the importance of keeping the total amount of fraudulent deposits into a single bank account below \$10,000 to avoid federal transaction reporting requirements. SKULSTAD explained, "anything close to 10k [is] automatically looked at some how lol.... anything 10k gets looked at by the IRS lol."

POST responded, “your right bro,” and later clarified that he’s “not trying to compete” with SKULSTAD because “we’re doing this together....”

**F.O.**

OA25: On or about December 29, 2020, POST deposited or caused to be deposited a fraudulent \$4,872 check drawn from Santander Bank, N.A. account ending in -3106 in victim I.J.’s name, into Key Bank account ending in -8849 in “Play” F.O.’s name.

OA26: On or about December 29, 2020, POST deposited or caused to be deposited a fraudulent \$2,500 check drawn from BMO Harris Bank (f/k/a M&I Marshall & Ilsley Bank) account ending in -7753 in victim J.C.’s name, into Key Bank account ending in -8849 in “Play” F.O.’s name.

OA27: On or about January 3, 2021, POST obtained B.T.’s bank account login information for Alaska USA account ending in -0034 and B.T.’s other Personally Identifiable Information from “Play” F.O., and sent it to SKULSTAD via Facebook messenger.

OA28: On or about January 5, 2021, POST sent a Facebook message to SKULSTAD with “Play” F.O.’s bank account login information, password and other Personally Identifiable Information.

OA29: On or about January 5, 2021, SKULSTAD used B.T.’s Personally Identifiable Information to log into Alaska USA account ending in -0034.

OA30: On or about January 5, 2021, SKULSTAD deposited or caused to be deposited a fraudulent \$2,750 check drawn from Mt. McKinley Bank account ending in -

1588 in victim T. LLC's name—a business owned by victim Z.M.—into Alaska USA account ending in -0034 in “Play” B.T.’s name.

OA31: On or about January 5, 2021, SKULSTAD deposited or caused to be deposited a fraudulent \$2,000 check drawn from Mt. McKinley Bank account ending in -1588 in victim T. LLC's name—a business owned by victim Z.M.—into Alaska USA account ending in -0034 in “Play” B.T.’s name.

OA32: On or about January 5, 2021, SKULSTAD and unindicted co-conspirator T.K. attempted to cash a fraudulent \$1,200 check drawn from Mt. McKinley Bank account ending in -1588 in victim T. LLC's name—a business owned by victim Z.M.—at Mt. McKinley Bank in Fairbanks, Alaska. The check was signed by “Levi S.”

OA33: On or about January 8, 2021, POST caused \$514.80 to be transferred from “Play” B.T.’s Alaska USA account ending in -0034, via PayPal to SKULSTAD.

All of which is in violation of 18 U.S.C. § 1349.

#### COUNT 2-12

17. The allegations above are realleged and incorporated as if fully set forth in this count.

#### THE SCHEME TO DEFRAUD

18. Beginning on a date unknown to the Grand Jury, and continuing until at least January 2021, within the District of Alaska and elsewhere, defendants JARED POST and LEVI SKULSTAD, and others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly and with intent to defraud, devised, executed, and attempted to execute a scheme to obtain monies, funds, assets, and other property owned by and in

the custody and control of Alaska USA, Mt. McKinley Bank, U.S. Bank, Santander Bank, N.A., Key Bank, MAC Federal Credit Union, Citibank and Wells Fargo (the “victim banks,”) by means of materially false and fraudulent pretenses, representations, and promises.

19. The fraudulent scheme was operated and carried out, in substance, as set forth in paragraphs 6-15 of this Indictment.

20. On or about the following dates, defendants POST and SKULSTAD, committed and willfully caused others to commit the following acts, each of which constituted an execution and attempted execution of the fraudulent scheme and constitutes a separate and distinct count of this Indictment:

COUNT	DEFENDANT(s)	DATE	ACT
2	POST	May 6, 2019	POST deposited or caused to be deposited a fraudulent \$650 check drawn from Wells Fargo bank account ending in -2651 in victim G.P.’s name, into U.S. Bank account ending in -6702 in “Play” S.G.’s name.
3	POST	May 7, 2019	POST deposited or caused to be deposited a fraudulent \$1,343 check drawn from Wells Fargo bank account ending in -5794 in victim G.A.’s name, into U.S. Bank account ending in -6702 in “Play” S.G.’s name.
4	POST	August 13, 2020	POST deposited or caused to be deposited a fraudulent \$4,683.00 check drawn from Mt. McKinley Bank account ending in -4160 in victim M.Y.’s name, into Alaska USA account ending in -1998 in “Play” C.M.’s name.
5	POST	September 3, 2020	POST deposited or caused to be deposited a fraudulent \$4,625 check drawn from MAC Federal Credit

			Union account ending in -3161 in victim J.H.'s name, into Alaska USA account ending in -3574 in "Play" B.S.'s name.
6	POST	September 10, 2020	POST deposited or caused to be deposited a fraudulent \$4,253.71 check drawn from Wells Fargo account ending in -0373 in victim B.H.'s name, into Alaska USA account ending in -3574 in "Play" B.S.'s name.
7	POST	September 24, 2020,	POST deposited or caused to be deposited a fraudulent \$4,588 check drawn from Mt. McKinley Bank account ending in -9106 in victim J.D.'s name, into Alaska USA account ending in -3574 in "Play" B.S.'s name.
8	POST	October 12, 2020	POST deposited or caused to be deposited a fraudulent \$5,000 check drawn from Mt. McKinley Bank account ending in -3049 in victim G.W.'s name, into Alaska USA account ending in -2596 in "Play" M.G.'s name.
9	POST	October 14, 2020	POST deposited or caused to be deposited a fraudulent \$4,934 check drawn from Alaska USA bank account ending in -1225 in victim A. LLC's name, into Alaska USA account ending in -2596 in "Play" M.G.'s name.
10	POST	December 29, 2020	POST deposited or caused to be deposited a fraudulent \$4,872 check drawn from Santander Bank, N.A. account ending in -3106 in victim I.J.'s name, into Key Bank account ending in -8849 in "Play" F.O.'s name.
11	SKULSTAD	January 5, 2021	SKULSTAD deposited or caused to be deposited a fraudulent \$2,750 check drawn from Mt. McKinley Bank account ending in -1588 in victim T. LLC's name—a business owned by victim Z.M.—into Alaska USA

			account ending in -0034 in “Play” B.T.’s name.
12	SKULSTAD	January 5, 2021	SKULSTAD deposited or caused to be deposited a fraudulent \$2,000 check drawn from Mt. McKinley Bank account ending in -1588 in victim T. LLC’s name—a business owned by victim Z.M.—into Alaska USA account ending in -0034 in “Play” B.T.’s name.

All of which is in violation of 18 U.S.C. § 1344(2).

COUNTS 13-23

21. The allegations above are realleged and incorporated as if fully set forth in this count.

THE SCHEME TO DEFRAUD

22. On or about the dates set forth in the separate counts below, within the District of Alaska and elsewhere, defendants JARED POST and LEVI SKULSTAD, did knowingly, and with intent to defraud, devise and intend to devise a scheme and artifice to defraud as to a material matter and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts.

23. The fraudulent scheme was operated and carried out, in substance, as set forth in paragraphs 6-15 of this Indictment.

24. For the purpose of executing such scheme and artifice and attempting to do so, POST and SKULSTAD did transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs and signals, namely:

COUNT	DEFENDANT	DATE	WIRE TRANSACTION
13	POST	May 6, 2019	POST caused a remote deposit of \$650 to travel via interstate wires from Wells Fargo bank account ending in -2651, into U.S. Bank account ending in -6702.
14	POST	May 7, 2019	POST caused a remote deposit of \$1,343 to travel via interstate wires from Wells Fargo bank account ending in -5794, into U.S. Bank account ending in -6702
15	POST	August 13, 2020	POST caused a remote deposit of \$4,683.00 to travel via interstate wires from Mt. McKinley Bank account ending in -4160, into Alaska USA account ending in -1998.
16	POST	September 3, 2020	POST caused a remote deposit of \$4,625 to travel via interstate wires from MAC Federal Credit Union account ending in -3161, into Alaska USA account ending in -3574.
17	POST	September 10, 2020	POST caused a remote deposit of \$4,253.71 to travel via interstate wires from Wells Fargo account ending in -0373, into Alaska USA account ending in -3574.
18	POST	September 24, 2020,	POST caused a remote deposit of \$4,588 to travel via interstate wires from Mt. McKinley Bank account ending in -9106 in victim J.D.'s name, into Alaska USA account ending in -3574 in "Play" B.S.'s name.
19	POST	October 12, 2020	POST caused a remote deposit of \$5,000 to travel via interstate wires from Mt. McKinley Bank account ending in -3049, into Alaska USA account ending in -2596
20	POST	October 14, 2020	POST caused a remote deposit of \$4,934 to travel via interstate wires from Alaska USA bank account

			ending in -1225, into Alaska USA account ending in -2596
21	POST	December 29, 2020	POST caused a remote deposit of \$4,872 to travel via interstate wires from Santander Bank, N.A. account ending in -3106, into Key Bank account ending in -8849.
22	SKULSTAD	January 5, 2021	SKULSTAD caused a remote deposit of \$2,750 to travel via interstate wires from Mt. McKinley Bank account ending in -1588, into Alaska USA account ending in -0034
23	SKULSTAD	January 5, 2021	SKULSTAD caused a remote deposit of \$2,000 to travel via interstate wires from Mt. McKinley Bank account ending in -1588, into Alaska USA account ending in -0034.

All of which is in violation of 18 U.S.C. § 1343

COUNT 24

25. On or about May 6, 2019, within the District of Alaska and elsewhere, defendant, JARED POST, knowingly possessed and used, without lawful authority, a means of identification that defendant POST knew belonged to another person, to wit: the name and bank account number of victim G.P., during and in relation to the offense of Conspiracy to Commit Bank Fraud and Wire Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 25

26. On or about September 3, 2020, within the District of Alaska and elsewhere, defendant, JARED POST, knowingly possessed and used, without lawful authority, a means of identification that defendant POST knew belonged to another person, to wit: the



name and bank account number of victim J.H., during and in relation to the offense of Conspiracy to Commit Bank Fraud and Wire Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 26

27. On or about September 10, 2020, within the District of Alaska and elsewhere, defendant, JARED POST, knowingly possessed and used, without lawful authority, a means of identification that defendant POST knew belonged to another person, to wit: the name and bank account number of victim B.H., during and in relation to the offense of Conspiracy to Commit Bank Fraud and Wire Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 27

28. On or about October 26, 2020, within the District of Alaska and elsewhere, defendant, JARED POST, knowingly possessed and used, without lawful authority, a means of identification that defendant POST knew belonged to another person, to wit: the name and bank account number of victim J.W., during and in relation to the offense of Conspiracy to Commit Bank Fraud and Wire Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

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COUNT 28

29. On or about January 5, 2021, within the District of Alaska and elsewhere, defendant, LEVI SKULSTAD, knowingly possessed and used, without lawful authority, a means of identification that defendant SKULSTAD knew belonged to another person, to wit: the name and bank account login information for “Play” B.T.’s Alaska USA account ending in -0034, during and in relation to the offense of Conspiracy to Commit Bank Fraud and Wire Fraud, a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 29

30. The allegations above are realleged and incorporated as if fully set forth in this count.

31. Beginning on a date unknown to the Grand Jury, but no later than 2017, and continuing until in or around January 2021, within the District of Alaska and elsewhere, defendants JARED POST and LEVI SKULSTAD willfully and knowingly conspired and agreed together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses under 18 U.S.C. § 1956, to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of specified unlawful activity, that is, conspiracy to commit bank fraud and wire fraud, in violation of 18 U.S.C. § 1349, bank fraud, in violation of 18 U.S.C. § 1344(2), and wire fraud, in violation of 18 U.S.C. § 1343, knowing that each of the transactions was designed in whole and in part to conceal and disguise the nature, location,

source, ownership, and control of the proceeds of such specified unlawful activity, and knowing that each of the transactions was designed to avoid a transaction reporting requirement under State or Federal law.

All of which is in violation of 18 U.S.C. § 1956(h).

COUNTS 30-31

32. The allegations above are realleged and incorporated as if fully set forth in this count.

33. On or about the dates set forth below, within the District of Alaska and elsewhere, the defendants, JARED POST and LEVI SKULSTAD, knowing that the property involved in each of the financial transactions set forth below represented the proceeds of some form of unlawful activity, knowingly conducted, attempted to conduct, and willfully caused to be conducted, the below financial transactions affecting interstate commerce, which transactions, in fact, involved the proceeds of specified unlawful activity, namely, conspiracy to commit bank fraud and wire fraud, in violation of 18 U.S.C. § 1349, bank fraud, in violation of 18 U.S.C. 1344(2), and wire fraud, in violation of 18 U.S.C. § 1343, knowing that each of the transactions was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, and knowing that each of the transactions was designed to avoid a transaction reporting requirement under State or Federal law, with each financial transaction constituting a separate and distinct count of this Indictment as to the defendant set forth below:

COUNT	DEFENDANT	DATE	FINANCIAL TRANSACTION
30	POST	May 7, 2019	POST withdrew or caused to be transferred to him three (3) separate online transfers from U.S. Bank account ending in -6702 for a total of \$520 to Venmo account @jaredpost32, as well as a Western Union transfer for several hundred dollars to “Jared Wilkes Post Anchorage Alaska.”
31	POST SKULSTAD	January 8, 2021	POST caused \$514.80 to be transferred from “Play” B.T.’s Alaska USA account ending in -0034, via PayPal to SKULSTAD

All of which is in violation of 18 U.S.C. § 1956(a)(1)(B)(i) and (ii).

CRIMINAL FORFEITURE ALLEGATION

34. The allegations set forth in Counts 1 through 33 are incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 982(a)(2)(A) and (B).

35. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the above-named defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 982(a)(2)(A) and (B), and 28 U.S.C. § 2461(c), including but not limited to all property, real or personal, which constitutes or is derived from proceeds traceable to a conspiracy to commit bank fraud, bank fraud, or aggravated identity theft, as charged in this Indictment, including but not limited to the following: approximately \$3,211.00 in U.S. currency.

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All pursuant to 18 U.S.C. § 982(a)(2)(A) and (B), and Federal Rule of Criminal  
Procedure 32.2.

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Ryan D. Tansey  
RYAN D. TANSEY  
Assistant U.S. Attorney  
United States of America

s/ E. Bryan Wilson for  
S. LANE TUCKER  
United States Attorney  
United States of America

DATE: June 21, 2022