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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAZZAMIN TASHAY CLARK,

Defendant.

INDICTMENT

Counts 1-8: 18 U.S.C. § 1343 (Wire
Fraud)

Counts 9-16: 18 U.S.C. § 1347 (Health
Care Fraud)

Counts 17-21: 18 U.S.C. § 1957 (Money
Laundering)

Case: 2:26-cr-00329
Assigned To : Parrish, Jill N.
Assign. Date : 8/25/2026

The Grand Jury charges:

At all times relevant to this Indictment:

I. DEFENDANT AND RELATED ENTITIES

1. Defendant JAZZAMIN TASHAY CLARK (“CLARK”) resided in Las Vegas, Nevada, and Salt Lake City, Utah, and owned and operated CREATIVE MINDS UT LLC (“CREATIVE MINDS”) and LUV WELL CARE LLC (“LUV WELL”), both purportedly in the business of providing substance use disorder treatment in Salt Lake City, Utah. CLARK had a National Provider Identifier (“NPI”) number that identified her as a Technician/Personal Care Attendant. CLARK was not a licensed mental health provider in Utah or Nevada.

2. Co-schemer 1 resided in Las Vegas, Nevada, and Salt Lake City, Utah, and operated CREATIVE MINDS with CLARK. Co-schemer 1 had an NPI number that identified her as a Case Manager/Care Coordinator. Co-schemer 1 was not a licensed mental health provider in Utah or Nevada.

3. CREATIVE MINDS was a registered Utah limited liability company formed on March 26, 2024, and with a physical (and mailing) address of 2880 West 4700 South, Suite B4, West Valley City, Utah 84119. Utah Division of Corporations records reflect CLARK as the registered agent and a member.

4. On or about July 15, 2024, CREATIVE MINDS was approved by the Utah Department of Health – Division of Medicaid and Health Financing (“Utah Medicaid”) as a Utah Medicaid provider. On or about the same date, the Utah Department of Human and Health Services (“UDOH”) approved CREATIVE MINDS for provider access to Provider

Reimbursement Information System for Medicaid (“PRISM”), a portal and platform for submitting Medicaid claims and accessing claims data.

5. CLARK and Co-schemer 1 owned and controlled a main operating business bank account for CREATIVE MINDS at JPMorgan Chase ending in 9782 (“Account 9782”), among many other business and personal accounts.

6. LUV WELL was a registered Utah limited liability company formed on March 26, 2025, and with a physical (and mailing) address of 2784 West Paprika Drive, Salt Lake City, Utah 84129. Utah Division of Corporations records reflect CLARK as the registered agent and a member.

7. On or about May 29, 2025, LUV WELL was approved by Utah Medicaid as a Utah Medicaid provider. On or about the same date, UDOH approved LUV WELL for provider access to the PRISM portal.

8. CLARK owned and controlled a main operating business bank account for LUV WELL at America First Credit Union ending in 7096 (“Account 7096”), among many other business and personal accounts.

II. THE MEDICAID PROGRAM

9. The Medicaid Program was a federal healthcare benefit program providing health care benefits to indigent individuals who are aged, blind, disabled, or members of families with dependent children. The benefits available under Medicaid were governed by state and federal statutes and regulations. The Medicaid Program was overseen and

administered by United States Department of Health and Human Services and Utah Medicaid. The United States contributed approximately 75 percent of the costs of the Medicaid Program, with the remaining costs contributed by the State of Utah. Individuals who received benefits under Medicaid were commonly referred to as Medicaid “beneficiaries.”

10. The Targeted Adult Medicaid program (“TAM”) was a specialized state health coverage initiative designed for low-income adults aged 19 to 64, without dependent children, earning up to five percent of the federal poverty level who face significant social risk factors such as chronic homelessness and justice-system involvement, including individuals on probation or parole, and those needing court-ordered or primary substance abuse and mental health treatment. TAM offered 12 months of continuous eligibility, basic medical care, behavioral health services, mental health and substance use disorder services, and access to supportive living assistance.

11. The Medicaid Program was a “health care benefit program,” as defined by 18 U.S.C. § 24(b) and a “Federal health care program,” as defined by 42 U.S.C. § 1320a-7b(f).

12. Therapists, mental health counselors, behavioral health technicians, treatment clinics, and other health care providers were able to apply for and obtain a Medicaid “provider number.” A healthcare provider that was issued a Medicaid provider number was able to file claims, or authorize the submission of claims on his or her behalf,

with Utah Medicaid to obtain reimbursement for services provided to Medicaid beneficiaries. A Medicaid claim was required to set forth, among other things, the beneficiary's name and Medicaid identification number, the services that were performed for the beneficiary, the date the services were provided, the cost of the services, and the name and National Provider Identifier ("NPI") number of the healthcare provider that ordered, supervised, and/or performed the services. When a claim was submitted, the provider certified, among other things, that:

- The information in the claim form was true, accurate, and complete;
- The provider had familiarized himself or herself with all applicable laws, regulations, and program instructions, which were available from the Medicaid contractor;
- The provider had provided or would provide sufficient information required to allow the government to make an informed eligibility and payment decision;
- The claim, whether submitted by the provider or on behalf of the provider's billing company, complied with all applicable Medicaid laws, regulations, and programs instructions for payment;
 - Applicable Medicaid laws, regulations, and programs instructions for payment included, but was not limited to, Section 2 of the Utah Medicaid Provider Manual, among others, covering the proper performance of and billing for Behavioral Health Services; and
- The services on the claim were medically necessary and personally furnished by the provider.

13. Section 2 of the Utah Medicaid Provider Manual, among other sections, covered the proper performance of and billing for Behavioral Health Services, including but not limited to, the following behavioral health services and requirements:

Procedure Code	Description
90792	Psychiatric Diagnostic Evaluation with Medical Services (per 15 minutes) Performed by a Utah licensed mental health therapist.
90837	Individual Psychotherapy Session (60 minutes) Performed by a Utah licensed mental health therapist.
90838	Individual Psychotherapy Performed Alongside Evaluation/Management Service Performed by a Utah licensed mental health therapist.
90839	Individual Psychotherapy Session for a Crisis (60 minutes) Performed by a Utah licensed mental health therapist.
90840	Individual Psychotherapy Session for a Crisis (each additional 30 minutes) Performed by a Utah licensed mental health therapist.
H0031	Mental Health Assessment by a Non-Mental Health Therapist (per 15 minutes) Performed by non-mental health therapist, including among others, a <i>Utah licensed</i> social service worker, substance use disorder counselor, behavioral health coach, individual with qualifying bachelor's degree and actively engaged in meeting DOPL requirements to obtain licensure as a social service worker, or individual enrolled in a qualified substance use disorder education program who is exempted from licensure in accordance with State law and under DOPL-required supervision (collectively, "qualified non-mental health therapist").
H0032	Mental Health Service Plan Development by a Non-Mental Health Therapist (per 15 minutes) - Code and procedure designated for use in the Autism Spectrum Disorder program, not the Behavioral Health program. - Performed by a qualified non-mental health therapist.
H2013	Psychiatric Health Facility Service, Per Diem Service rendered as part of Mental Health Residential Treatment Program.

	Facility licensed by UDOH Office of Licensing as a residential treatment program.
H2014	Individual Psychosocial Rehabilitation Services (per 15 minutes) Performed by a <i>Utah licensed</i> mental health therapist or by the following providers, among others, under the proper supervision of a <i>Utah licensed</i> mental health therapist: individual with qualifying bachelor's degree and actively engaged in meeting DOPL requirements to obtain licensure as a social service worker, <i>Utah licensed</i> certified advanced substance use disorder counselor, advanced substance use disorder counselor, certified substance use disorder counselor, substance use disorder counselor, behavioral health coach, certified behavioral health technician, or individual enrolled in a qualified substance use disorder education program who is exempted from licensure in accordance with State law and under DOPL-required supervision (collectively, "qualified psychosocial rehabilitation service provider").
H2017	Group Psychosocial Rehabilitation Services (per 15 minutes) Performed by a qualified psychosocial rehabilitation service provider.
H2018	Group Psychosocial Rehabilitation Services (per diem) Service not covered for Utah Medicaid beneficiaries.
H2019	Therapeutic Behavioral Rehabilitation Services (per 15 minutes) Performed by a <i>Utah licensed</i> mental health therapist or by the following providers, among others, under the proper supervision of a <i>Utah licensed</i> mental health therapist: individual with qualifying bachelor's degree and actively engaged in meeting DOPL requirements to obtain licensure as a social service worker, <i>Utah licensed</i> certified advanced substance use disorder counselor, advanced substance use disorder counselor, certified substance use disorder counselor, substance use disorder counselor, or behavioral health coach.
H2024	Supported Employment Services (per diem) Service not covered for Utah Medicaid beneficiaries.
H2032	Activity Therapy (per 15 minutes) - Performed by <i>Utah licensed</i> master therapeutic recreation specialist, therapeutic recreation specialist, or therapeutic recreation technician. <i>Utah licensed</i> mental health therapist must refer a member for recreational therapy services and documented in the behavioral treatment plan and in the recreational therapy treatment plan.

14. Medicaid providers such as CREATIVE MINDS and LUV WELL were required to comply with all applicable federal and state law.

III. THE SCHEME AND ARTIFICE TO DEFRAUD

15. Beginning around July 2024 and continuing through around October 2025, in the District of Utah and elsewhere,

JAZZAMIN TASHAY CLARK,

defendant herein, and Co-schemer 1, knowingly devised and executed a scheme and artifice to defraud and to obtain money and property from Utah Medicaid by means of materially false and fraudulent pretenses, representations, and promises, and material omissions of facts, and did aid and abet and willfully cause another to commit an offense therein.

IV. OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD

16. It was the object of the scheme and artifice to defraud and for defendant and Co-schemer 1 to unlawfully enrich themselves by, among other things, submitting and causing the submission of false and fraudulent claims to Utah Medicaid and concealing and causing the concealment of the submission of false and fraudulent claims to Utah Medicaid.

**V. MANNER AND MEANS OF
THE SCHEME AND ARTIFICE TO DEFRAUD**

Defendant and Co-schemer 1 sought to accomplish the object of the scheme and artifice to defraud (the “scheme”) in the following manner and through the following means, among others:

17. It was part of the scheme that CREATIVE MINDS and LUV WELL were formed and approved by Utah Medicaid as providers under false and fraudulent pretenses.

18. It was further part of the scheme that defendant and Co-schemer 1 recruited and directed the recruiting of Utah Medicaid and Utah Medicaid-eligible beneficiaries (“Medicaid beneficiaries”) who qualified for TAM program benefits, and were in need of services, including mental health and substance use disorders services (“therapy services”). Medicaid beneficiaries often were drawn from people, among others, experiencing homelessness, referrals from probation officers, and community health centers.

19. It was further part of the scheme that defendant and Co-schemer 1 located and rented houses in, among other areas, West Valley City for use as “sober living homes” by Medicaid beneficiaries. In truth and fact, these homes were neither geared nor intended to promote sobriety, with Medicaid beneficiaries left to fend for themselves without monitoring of substance abuse or care and assistance.

20. It was further part of the scheme that defendant and Co-schemer 1 recruited out-of-state licensed therapists to provide Medicaid beneficiaries (primarily via Zoom) therapy services covered under TAM. Some of these therapists were not licensed in Utah

and therefore ineligible to provide such services. Additionally, some therapists were unaware of, and had neither authorized nor consented to, their services being billed to Utah Medicaid, including the use of an NPI number to facilitate the billing for such services. Further, other therapists, although aware their services were being billed to Utah Medicaid, were unaware of the many additional services billed on their behalf that were never provided to Medicaid beneficiaries.

21. It was further part of the scheme that defendant and Co-schemer 1 recruited out-of-state unlicensed, unqualified individuals who were ineligible to provide Medicaid beneficiaries therapy services (primarily via Zoom) covered under TAM. Additionally, these individuals were unaware of, and had neither authorized nor consented to, their services being billed to Utah Medicaid, including the obtaining and use of NPI numbers to facilitate the billing for such services.

22. It was further part of the scheme that defendant and Co-schemer 1 created and caused the creation of false and fraudulent employee personnel files for many recruits which contained, among other records, false and fraudulent employment applications and agreements, training materials and certificates, tax forms, and other employment-related records.

23. It was further part of the scheme that defendant and Co-schemer 1 paid their recruits (primarily through the payment platform Zelle), including those who performed no therapy services, to be on “standby” in the event their services were needed. Such payments

lulled recruits into a false sense of security that nothing fraudulent was amiss and there was little, if any, reason to be suspicious.

24. It was further part of the scheme that defendant and Co-schemer 1 submitted and caused to be submitted false and fraudulent claims to Utah Medicaid for: (1) therapy services not rendered; (2) therapy services rendered by unqualified, unlicensed Utah Medicaid providers; and (3) non-covered therapy services (collectively, “fraudulent therapy services”).

25. It was further part of the scheme that defendant and Co-schemer 1 created and directed the creation of false and fraudulent entries and notations in patient charts and records in TherapyNotes, the web-based electronic health record and practice management software used primarily by defendant and Co-schemer 1, or others acting at their direction and instruction, to document and justify the billing of fraudulent therapy services to Utah Medicaid.

26. Between in or around July 2024 and continuing through in or around October 2025, Utah Medicaid paid defendant and Co-schemer 1 through Accounts 9782 (CREATIVE MINDS) and 7096 (LUV WELL), respectively, over approximately \$4 million on claims for fraudulent therapy services submitted and caused to be submitted by defendant and Co-schemer 1. Defendant and Co-schemer 1 used these ill-gotten gains to, among other things, promote and perpetuate the scheme to defraud, and to pay personal and business expenses unrelated to CREATIVE MINDS and LUV WELL.

**Counts 1-8
18 U.S.C. §§ 1343 and 2
(Wire Fraud)**

27. The factual allegations set forth above are incorporated herein by reference.

28. At all times relevant to the Indictment, the Utah Medicaid PRISM vendor was Acentra Health, LLC, partnering with Amazon AWS (us-west-2 region), a cloud-based Medicaid management information system located in Oregon, provided a state Medicaid system to handle high-volume healthcare files and Utah Medicaid claims accurately and efficiently. Therefore, every Utah Medicaid claim submitted or caused to be submitted by defendant and Co-Schemer 1 through PRISM, including the claims alleged in Count 1 through 8 below, involved an interstate wire transmission between Utah and Oregon.

29. Beginning in around July 2024 and continuing through October 2025, in the District of Utah and elsewhere,

JAZZAMIN TASHAY CLARK,

defendant herein, and Co-schemer 1 knowingly and for the purpose of executing the scheme and artifice to defraud and to obtain money and property from Utah Medicaid by means of material false and fraudulent pretenses, representations, promises, and omissions of material facts described in this Indictment, caused to be transmitted and aided and abetted the transmission, by means of wire communication in interstate commerce, writings, signs, and signals, the following claims, among others, to Utah Medicaid for fraudulent therapy services allegedly rendered to Medicaid beneficiaries:

Count	Claim Number (Dates of Service)	Claim Submission Date (on or about)	Utah Medicaid Provider	Fraudulent Therapy Services (Procedure Code)	Medicaid Beneficiary
1	212422800020970000 (7/24 to 8/14/2024)	08/15/2024	1	Services not rendered: • Mental Health Assessment by a Non-Mental Health Therapist (per 15 minutes) – 8 units (H0031) • Individual Psychosocial Rehabilitation Services (per 15 minutes) – 16 units (H2014)	1
2	212425600277992000 (9/6 to 9/12/2024)	09/12/2024	2	Services not rendered and performed by unqualified and unlicensed provider: • Individual Psychosocial Rehabilitation Services (per 15 minutes) – 16 units (H2014)	2
3	212515600011936000 (5/29 to 6/4/2025)	06/05/2025	3	Services not rendered and performed by unqualified and unlicensed provider: • Activity Therapy (per 15 minutes) – 8 units (H2032) • Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019)	3

4	212525900024625000 (9/2 to 9/11/2025)	09/11/2025	4	Services not rendered and performed by unqualified and unlicensed provider: • Individual Psychosocial Rehabilitation Services (per 15 minutes) – 8 units (H2014)	4
5	212525900023333000 (9/12 and 9/13/2025)	09/16/2025	5	Services not rendered: • Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019) • Psychiatric Health Facility Service (per diem) (H2013) • Individual Psychotherapy Session (60 minutes) (90837)	4
6	212526700081043000 (9/1 to 9/17/2025)	09/24/2025	6	Services not rendered and performed by unqualified and unlicensed provider: • Activity Therapy (per 15 minutes) – 8 units (H2032) • Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019)	5
7	212527500019193000 (9/1/2025)	10/02/2025	7	Services not rendered: • Activity Therapy (per 15 minutes) – 8 units (H2032) • Individual Psychotherapy for Crisis (initial 60 minutes) (90839) • Psychiatric Treatment Crisis (each additional 30 minutes) (90840)	6

				Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019)	
8	212528800089741000 (10/9/2025)	10/15/2025	8	Services not rendered and performed by unqualified and unlicensed provider: - Activity Therapy (per 15 minutes) – 8 units (H2032) - Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019)	7

All in violation of 18 U.S.C. §§ 1343 and 2.

Counts 9-16
18 U.S.C. §§ 1347 and 2
(Health Care Fraud)

30. The factual allegations set forth above are incorporated herein by reference.

31. Beginning in around July 2024 and continuing through around October 2025, in the District of Utah and elsewhere,

JAZZAMIN TASHAY CLARK,

defendant herein, and Co-schemer 1 in connection with the delivery of and payment for health care benefits, items, and services, knowingly and willfully executed and attempted to execute, a scheme and artifice to defraud a health care benefit program affecting interstate commerce (to wit: Utah Medicaid) and to obtain by means of false and fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of Utah Medicaid, and aided, abetted, counseled,

commanded, induced, and procured the commission of said scheme, and did willfully cause said scheme. In execution of the scheme and artifice to defraud a health care benefit program, defendant and Co-schemer 1 aided and abetted each other and caused the transmission of the following claims, among others, to Utah Medicaid for fraudulent therapy services allegedly rendered to Medicaid beneficiaries:

Count	Claim Number (Dates of Service)	Claim Submission Date (on or about)	Utah Medicaid Provider	Fraudulent Therapy Services (Procedure Code)	Medicaid Beneficiary
9	212422800020970000 (7/24 to 8/14/2024)	08/15/2024	1	Services not rendered: • Mental Health Assessment by a Non-Mental Health Therapist (per 15 minutes) – 8 units (H0031) • Individual Psychosocial Rehabilitation Services (per 15 minutes) – 16 units (H2014)	1
10	212425600277992000 (9/6 to 9/12/2024)	09/12/2024	2	Services not rendered and performed by unqualified and unlicensed provider: • Individual Psychosocial Rehabilitation Services (per 15 minutes) – 16 units (H2014)	2

11	212515600011936000 (5/29 to 6/4/2025)	06/05/2025	3	Services not rendered and performed by unqualified and unlicensed provider: • Activity Therapy (per 15 minutes) – 8 units (H2032) • Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019)	3
12	212525900024625000 (9/2 to 9/11/2025)	09/11/2025	4	Services not rendered and performed by unqualified and unlicensed provider: • Individual Psychosocial Rehabilitation Services (per 15 minutes) – 8 units (H2014)	4
13	212525900023333000 (9/12 and 9/13/2025)	09/16/2025	5	Services not rendered: • Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019) • Psychiatric Health Facility Service (per diem) (H2013) • Individual Psychotherapy Session (60 minutes) (90837)	4
14	212526700081043000 (9/1 to 9/17/2025)	09/24/2025	6	Services not rendered and performed by unqualified and unlicensed provider: • Activity Therapy (per 15 minutes) – 8 units (H2032) • Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019)	5

15	212527500019193000 (9/1/2025)	10/02/2025	7	Services not rendered: • Activity Therapy (per 15 minutes) – 8 units (H2032) • Individual Psychotherapy for Crisis (initial 60 minutes) (90839) • Psychiatric Treatment Crisis (each additional 30 minutes) (90840) • Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019)	6
16	212528800089741000 (10/9/2025)	10/15/2025	8	Services not rendered and performed by unqualified and unlicensed provider: • Activity Therapy (per 15 minutes) – 8 units (H2032) • Therapeutic Behavioral Rehabilitation Services (per 15 minutes) – 8 units (H2019)	7

All in violation of 18 U.S.C. §§ 1347 and 2.

Counts 17-21
18 U.S.C. §§ 1957 and 2
(Money Laundering)

32. The factual allegations set forth above are incorporated herein by reference.

33. At all times relevant to the Indictment, CLARK owned and controlled a business bank account under Glam' D By Sisters at Navy Federal Credit Union ending in 3377 ("Account 3377").

34. On or about the dates alleged below, in the District of Utah and elsewhere,

JAZZAMIN TASHAY CLARK,

defendant herein, and Co-schemer 1 knowingly engaged and attempted to engage, in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the following transfer of funds, such property having been derived from specified unlawful activity (to wit: Wire Fraud in violation of 18 U.S.C. § 1343 and Health Care Fraud in violation of 18 U.S.C. § 1347), and did aid and abet each other therein:

Count	Date (On or About)	Description of Transaction (Approx.)	Participants
17	09/26/2025	\$15,000 wire transfer from Account 7096 (LUV WELL) to Account 3377	CLARK
18	10/09/2025	\$20,000 online transfer from Account 9782 (CREATIVE MINDS) to Account 0576	CLARK Co-Schemer 1
19	10/14/2025	\$28,000 online transfer from Account 9782 (CREATIVE MINDS) to Account 3801	CLARK Co-Schemer 1
20	10/23/2025	\$30,000 wire transfer from Account 9782 (CREATIVE MINDS) to Account 3377	CLARK Co-Schemer 1
21	10/27/2025	\$30,000 wire transfer from Account 7096 (LUV WELL) to Account 3377	CLARK

All in violation of 18 U.S.C. §§ 1957 and 2.

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 982(a)(7), upon conviction of any Federal health care offense, including any offense violating 18 U.S.C. §§ 1343 or 1347 as charged herein, the

defendant shall forfeit to the United States of America any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense violating 18 U.S.C. §§ 1343 or 1347, the defendant shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the offense.

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. § 1957, the defendant shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

The property sought for forfeiture under one or more of the forfeiture authorities cited above includes, but is not limited to, the following:

- \$443,545.58 seized from JPMorgan Chase Bank, N.A. account ending in 9782 and in the name of Creative Minds TX, a Texas LLC managed by CLARK with CLARK and Co-Schemer 1 as signers;
- \$657,792.90 seized from America First Credit Union account ending in 7096 and in the name of Luv Well Care, a Utah LLC, managed by CLARK with CLARK, D.C., and T.K. as signers;
- \$24,890.44 seized from America First Credit Union account ending in 6113 and in the name of Impact Community Services, a Utah LLC, managed by D.C., with CLARK and D.C. as signers;

- \$15,000.00 seized from Navy Federal Credit Union account ending in 3377 and in the name of Glam'd By Sisters, a Nevada LLC, Managed by CLARK, with CLARK as the signer;
- \$4,495.19 seized from BMO Bank, N.A. account ending in 3171 and in the name of Glam'd By Sisters a Nevada LLC, managed by CLARK with CLARK as signer;
- \$304.39 seized from Navy Federal Credit Union account ending in 3377 and in the name of Glam'd By Sisters, a Nevada LLC, managed by CLARK with CLARK as the signer;
- \$3,409.44 seized from Navy Federal Credit Union account ending in 7443 and in the name of Jesse Jazz Trucks LLC, with CLARK and J.R. as signers;
- Silver 2021 Chrysler Voyager Van, VIN ending in 8685, owned by CLARK and D.C.; and
- White 2019 Chrysler Pacifica Van, VIN ending in 0680, owned by CLARK.

The United States may seek a forfeiture money judgment against the defendant, as applicable, in an amount equal to the value of any property subject to forfeiture that is unavailable as a result of any act or omission of that defendant for one or more of the reasons listed in 21 U.S.C. § 853(p).

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The United States may also seek to forfeit substitute assets as allowed by 18 U.S.C. § 982(b), 28 U.S.C. § 2461(c), and 21 U.S.C. § 853(p).

A TRUE BILL:

15/
FOREPERSON OF GRAND JURY

MELISSA HOLYOAK
United States Attorney



MARK Y. HIRATA
SACHI J. JEPSON
Assistant United States Attorneys
KAYE LYNN WOOTON
Special Assistant United States Attorney