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SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHELLE L. BOUZIDEN,

Defendant.

INDICTMENT

COUNT 1: Wire Fraud, 18 U.S.C. § 1343

COUNT 2: False Reports for Federal Workers'
Compensation Benefits, 18 U.S.C. § 1920

COUNT 3: Obstruction of Federal Department
and Agency Proceedings, 18 U.S.C. § 1505

COUNT 4: Theft of Government Property, 18
U.S.C. § 641

Case: 1:26-cr-00065
Assigned To : Campbell, Tena
Assign. Date : 09/22/2026

The Grand Jury Charges:

BACKGROUND

At all times relevant to this Indictment:

1. Defendant **MICHELLE L. BOUZIDEN** was a resident of Ogden, Utah.

2. **BOUZIDEN** was employed by the United States Department of Agriculture, Office of the Inspector General (USDA-OIG) as an Assistant Special Agent in Charge (ASAC).

FEDERAL EMPLOYEES' COMPENSATION ACT

3. The Federal Employees' Compensation Act (FECA), 5 U.S.C. § 8101 et seq., provides compensation to federal employees for injuries sustained during the performance of their workplace duties.

4. An employee may become totally disabled due to an injury on the job and eligible to collect FECA benefits for the duration of the disability. Injuries caused by a specific event or incident during work are considered "traumatic injuries."

5. An employee is totally disabled if, following her injury, she is unable to work at all. All periods of wage loss must be supported by medical reports demonstrating the employee is disabled for work from the injury.

6. To receive FECA benefits for a traumatic injury, a federal employee must first submit a Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay (Form CA-1) within 30 days of the injury to receive Continuation of Pay (COP).

7. COP covers up to 45 days of full regular salary without using sick or annual leave. After that time, an employee may seek additional compensation from the Office of Workers' Compensation Programs (OWCP)—a part of the United States' Department of Labor—by submitting a Claim for Compensation (Form CA-7).

8. Form CA-7 must be submitted every two weeks, corresponding to federal pay periods, so that OWCP can continuously verify eligibility. Form CA-7 does not permit the claimant to request benefits for prospective periods of disability.

9. Each time an employee submits Form CA-7, she signs and attests to the following:

I hereby make claim for compensation because of the injury sustained by me while in the performance of my duty for the United States. I certify that the information provided above is true and accurate to the best of my knowledge and belief.

10. The attestation advises the employee who submits it that

Any person who knowingly makes a false statement, misrepresentation, concealment of fact, or any other act of fraud, to obtain compensation as provided by the FECA, or who knowingly accepts compensation to which that person is not entitled is subject to civil or administrative remedies as well as criminal prosecution and may, under appropriate criminal provisions, be punished by a fine or imprisonment, or both. In addition, a state or federal criminal conviction for FECA fraud will result in termination of all current and future FECA benefits.

11. United States Department of Agriculture employees are covered by FECA.

Between July 1, 2022 and June 30, 2023, the FECA program paid out approximately \$3.26 billion in benefits, including around \$2.35 billion in disability benefits.

THE SCHEME AND ARTIFICE TO DEFRAUD

12. Beginning on a date unknown but as early as May 14, 2026, and continuing through the present, within the District of Utah and elsewhere,

MICHELLE L. BOUZIDEN,

defendant herein, devised and intended to devise a scheme to obtain money and property by means of false and fraudulent pretenses, representations, promises, and omissions of material facts.

13. In executing and attempting to execute the scheme and artifice to defraud, and in furtherance thereof, **BOUZIDEN**:

- a. knowingly transmitted and caused to be transmitted, wire communications in interstate commerce in violation of 18 U.S.C. § 1343 (Wire Fraud);
- b. knowingly and willfully made and used false statements and reports knowing them to contain false, fictitious, and fraudulent statements in connection with an application for compensation or benefits in violation of 18 U.S.C. § 1920 (False Reports for Federal Workers' Compensation Benefits); and,
- c. corruptly influenced, obstructed, and impeded a pending proceeding before a department and agency of the United States in violation of 18 U.S.C. § 1505 (Obstruction of Federal Department and Agency Proceedings).
- d. knowingly and willfully converted to her own use more than \$1,000 in federal disability funds, knowing it belonged to the United States, in violation of 18 U.S.C. § 641.

OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD

14. The object of the scheme and artifice to defraud was for **BOUZIDEN**—after recovering from an injury sustained at work—to obtain additional OWCP disability benefits through false statements, misrepresentations, deception, fraudulent conduct, and omissions of material facts.

MANNER AND MEANS

15. In executing and attempting to execute the scheme and artifice to defraud, and in furtherance thereof, **BOUZIDEN** employed at least the following manner and means:

16. On April 2, 2026, **BOUZIDEN** filed a Form CA-1 to obtain benefits for a traumatic injury she suffered on March 28, 2026 while working as ASAC for the USDA-OIG.

17. An initial Work Capacity Evaluation diagnosed **BOUZIDEN** with a concussion and indicated she needed complete physical and mental rest until her symptoms resolved; the doctor noted the restrictions applied through April 22, 2026 and eventually scheduled **BOUZIDEN**'s return-to-work date for May 15, 2026.

18. **BOUZIDEN** did not return to work on May 15, 2026; she instead obtained ongoing disability benefits through OWCP even as she traveled internationally and actively pursued a high-endurance, athletic lifestyle.

19. **BOUZIDEN** applied for and received OWCP benefits by falsely and fraudulently submitting or causing to be submitted via interstate wires, Claims for Compensation (Forms CA-7), requesting ongoing leave without pay with an attestation from **BOUZIDEN** that the claims were because of the injury sustained at work, including without limitation:

- a. Form CA-7 signed by **BOUZIDEN** and filed on or about June 22, 2026 for pay period 11 (May 13, 2026 to June 12, 2026);
- b. Form CA-7 signed by **BOUZIDEN** and filed on or about June 30, 2026 for pay period 12 (June 15, 2026 to June 26, 2026);
- c. Form CA-7 signed by **BOUZIDEN** and filed on or about August 10, 2026 for pay period 13 (June 28, 2026 to July 11, 2026);
- d. Form CA-7 signed by **BOUZIDEN** and filed on or about August 10, 2026 for pay period 14 (July 12, 2026 to July 25, 2026);

- e. Form CA-7 signed by **BOUZIDEN** and filed on or about August 10, 2026 for pay period 15 (July 26, 2026 to August 8, 2026);
- f. Form CA-7 signed by **BOUZIDEN** and filed on or about September 4, 2026 for pay period 16 (August 9, 2026 to August 22, 2026);
- g. Form CA-7 signed by **BOUZIDEN** and filed on or about September 11, 2026 for pay period 17 (August 23, 2026 to September 5, 2026).

20. **BOUZIDEN** verified her eligibility for disability benefits by submitting and causing to be submitted to OWCP via interstate wire, fraudulent medical forms that (1) falsely reported ongoing concussion symptoms, (2) made untrue statements, and (3) misrepresented material facts about **BOUZIDEN**'s physical abilities, including, without limitation, the following:

- a. On May 14, 2026, a Work Capacity Evaluation (WCE) wherein **BOUZIDEN** reported that her concussion symptoms were the "worst ever" and her headaches were "daily with fluctuating severity." The WCE indicated **BOUZIDEN** was completely unable to engage in "arduous physical activity" and "cognitive reasoning," and could not perform any required work tasks such as sitting walking, standing, twisting, bending, squatting, kneeling, climbing, and operating a motor vehicle. This WCE relied mainly upon **BOUZIDEN**'s anecdotal claims and a third-party cognitive assessment **BOUZIDEN** provided, which in turn was based on a "clinical interview" and "the patient's subjective reporting of symptoms";
- b. An Attending Physician's Report from June 1, 2026, noting **BOUZIDEN** was "very symptomatic" with her "cognitive ability significantly impacted" and, based on **BOUZIDEN**'s claims, reporting she was completely unable to sit, walk, stand, bend, twist, stoop, climb, operate a motor vehicle, or perform repetitive movements for any amount of time related to work;
- c. On July 30, 2026, a Work Capacity Evaluation (WCE) was filed with OWCP wherein **BOUZIDEN** reported she was "unable to maintain cognitive demand." The WCE indicated **BOUZIDEN** was completely unable to perform for even an hour any required work tasks such as sitting

walking, standing, twisting, bending, squatting, kneeling, climbing, and operating a motor vehicle;

- d. An Attending Physician's report also on July 30, 2026, noting **BOUZIDEN** indicated she was suffering "chronic migraines" and she was "*partially* disabled";
- e. A WCE dated August 18, 2026, indicating **BOUZIDEN** was still unable to maintain cognitive demand and she suffered "low-grade persistent concussive symptoms." The WCE registered slight improvements: **BOUZIDEN** could now walk and stand for four hours a day, and bend and operate a vehicle for one hour a day. She remained unable to climb, twist, bend, pull, lift, and squat for any period of time;
- f. The Attending Physician's Report from August 18, 2026 remarked that there was gradual improvement, but **BOUZIDEN** was "still too symptomatic to return" to work. She was listed as "*totally* disabled." The Report was submitted by **BOUZIDEN** without her seeing a physician.

21. **BOUZIDEN** obtained OWCP pay by omitting material facts about her activity

levels and physical abilities, including without limitation, the following:

- a. A 7.5-mile hike with 1,378 feet in elevation gain completed by **BOUZIDEN** in about 3 hours on or around May 17, 2026;
- b. A 9.2-mile hike with 2,881 feet in elevation gain completed by **BOUZIDEN** in about 4.5 hours on or around May 24, 2026;
- c. A trip between Salt Lake City, Utah and Stillwater, Oklahoma on or around June 4 and June 7, 2026, with **BOUZIDEN** traveling by plane and car;
- d. A 3.4-mile hike in Huntsville, Utah completed by **BOUZIDEN** in a little over an hour on or around June 14, 2026;
- e. A 9.1-mile, 2,700-foot vertical mountain hike completed by **BOUZIDEN** in 4.5 hours on June 21, 2026;
- f. A 4.1-mile hike completed by **BOUZIDEN** in 4.5 hours on June 27, 2026;
- g. An 11.5-mile hike completed by **BOUZIDEN** on June 28, 2026;

- h. A 13-mile, 2,600-foot vertical mountain hike completed by **BOUZIDEN** in 4.5 hours on July 13, 2026;
- i. Traveling by plane and car from Salt Lake City, Utah to Mexico around July 15–19, 2026. Activities in Mexico included outdoor swimming;
- j. Traveling from Salt Lake City, Utah to Blue River, Colorado between August 1–2, 2026, where **BOUZIDEN** then climbed Quandary Peak, a strenuous 7.6-mile hike with an elevation gain of 3,422 feet, in just under 6 hours;
- k. Traveling from Salt Lake City, Utah to Milan, Italy (by way of Paris, France) on August 20, 2026. **BOUZIDEN** remained in Italy before flying back to Utah on September 3, 2026 and documented traveling by train while there. **BOUZIDEN** hiked 59.8 miles in the Italian Dolemite range over the course of 8 days.

22. United States Department of Labor, OWCP-FECA took steps to formally adjudicate **BOUZIDEN**'s claims, attempting to gain additional evidence through a second medical opinion, but **BOUZIDEN** actively and intentionally worked to influence, obstruct, or impede the pending adjudication proceedings through one or more of the following:

- a. After being informed of a mandatory, independent second opinion medical evaluation scheduled for August 3, 2026, **BOUZIDEN** left a voicemail for OWCP on July 24, 2026 claiming she had a scheduling conflict due to a "Wellness Retreat," when in fact she went on an "Immersive Adventure" trip to hike Quandary Peak Trail in Breckenridge, Colorado.
- b. After the independent second opinion medical evaluation was rescheduled for August 31, 2026, **BOUZIDEN** contacted USDA Human Resources on August 10, 2026 and falsely stated that
 - i. OWCP cancelled her August 3, 2026 exam;
 - ii. She could not attend her rescheduled evaluation due to another "Wellness Retreat"; and

iii. She “is not able to go outside at all” because outdoor exposure directly exacerbates her severe migraines.

c. In fact, on August 31, **BOUZIDEN** was hiking the Dolemites for another “Immersive Adventure” trip.

23. Altogether, between about May 17 and August 31, 2026, **BOUZIDEN** participated in approximately 17 mountain climbing expeditions, totaling over 140 miles of terrain and 35,469 feet of elevation.

24. Between May 13, and September 5, 2026, **BOUZIDEN** received \$51,571.73 in disability compensation through FECA.

COUNT 1
18 U.S.C. § 1343
(Wire Fraud)

25. All the factual allegations set forth in this Indictment are incorporated by reference and realleged as though fully set forth herein.

26. Beginning in and around May 2026, and continuing through the present, within the District of Utah and elsewhere,

MICHELLE L. BOUZIDEN,

defendant herein, having devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, promises, and omissions of material facts, for the purpose of executing said scheme and artifice to defraud, did cause to be transmitted by means of wire

communication certain writings, signs and signals, that is, an interstate wire, in instances including but not limited to the following instance set forth below:

COUNT	DATE (on or about)	WIRE COMMUNICATIONS
1	June 15, 2026	Work Capacity Evaluation Form sent from Ogden, Utah to Parkersburg, West Virginia via interstate telecommunications fax to receive federal workers' compensation benefits, in which BOUZIDEN indicated her "cognitive ability is significantly impacted" from the traumatic workplace injury on March 28, 2026, and she is unable to sit, walk, stand, reach, twist, bend, operate a motor vehicle, lift, squat, kneel, and climb for any period of time

all in violation of 18 U.S.C. § 1343.

COUNT 2

18 U.S.C. § 1920

(False Reports for Federal Workers' Compensation Benefits)

27. All factual allegations set forth above are incorporated by reference and realleged as though fully set forth herein.

28. From in and around May 2026, up to and including at least in and around September 2026, both dates being approximate and inclusive, in the District of Utah and elsewhere,

MICHELLE L. BOUZIDEN

defendant herein, did knowingly and willfully falsify, conceal, and cover up material facts, and make one or more false, fictitious and fraudulent statements and representations, and did make and use false statements and reports knowing the same to contain one or more

false, fictitious and fraudulent statements and entries in connection with an application for a receipt of compensation and other benefits and payments under Subchapter I of Chapter 81 of Title 5, United States Code, in that she submitted claims for federal worker's compensation disability benefits, when in fact **BOUZIDEN** was not disabled, and thereby obtained benefits in excess of \$1,000; all in violation of 18 U.S.C. § 1920.

COUNT 3

18 U.S.C. § 1505

(Obstruction of Federal Department and Agency Proceedings)

29. All factual allegations set forth above are incorporated by reference and realleged as though fully set forth herein.

30. On or about July 24 and August 10, 2026, in the District of Utah and elsewhere,

MICHELLE L. BOUZIDEN,

defendant herein, did corruptly obstruct, impede, and endeavor to obstruct and impeded, the due and proper administration of the law under which a pending proceeding was being had before the United States Department of Labor, OWCP-FECA, taking steps to conceal facts by affirmatively evading a second opinion medical evaluation, giving a misleading account of her activities, and misrepresenting her true medical condition;

all in violation of 18 U.S.C. § 1505.

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COUNT 4
18 U.S.C. § 641
(Theft of Government Funds)

31. All factual allegations set forth above are incorporated by reference and realleged as though fully set forth herein.

32. From in and around May 2026, and continuing through the present, within the District of Utah and elsewhere,

MICHELLE L. BOUZIDEN,

defendant herein, did willfully and knowingly receive, conceal, and retain stolen property of the United States, to include \$4,568.11 of federal disability benefits on or around July 2026, with intent to convert said property to her own use, knowing said property to have been stolen;
all in violation of 18 U.S.C. § 1505.

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 982(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense violating 18 U.S.C. § 1343, the defendants shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the scheme to defraud. The property to be forfeited includes but is not limited to (1) a money judgment equal to the value of any property not available for forfeiture as a result of any act or omission of the defendant for one or more of the reasons listed in 21 U.S.C. § 853(p), and (2) substitute property as allowed by 28 U.S.C. § 2461(c) and 21 U.S.C. § 853(p).

A TRUE BILL:

/s/

FOREPERSON OF GRAND JURY

MELISSA HOLYOAK
United States Attorney



LUISA GOUGH
Assistant United States Attorney