CROW

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	FILED UNDER SEAL
	)	
Plaintiff	)	**Criminal No.** 2:26cr20255 SHL/tmp
	)	
v.	)	**18 U.S.C. § 666(a)(1)(A)**
	)	**18 U.S.C. § 1343**
TAMARA SAWYER	)	**18 U.S.C. § 1346**
	)	**18 U.S.C. § 1349**
Defendant.	)	**18 U.S.C. § 1952(a)(1)**
	)	**18 U.S.C. § 1952(a)(3)**
	)	**18 U.S.C. § 1956(a)(1)(A)(i)**
	)	**18 U.S.C. § 1956(a)(1)(B)(i)**
	)	**18 U.S.C. § 1956(h)**

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

1. TAMARA SAWYER is the elected General Sessions Court Clerk for Shelby County, Tennessee. SAWYER assumed office on August 29, 2024.

2. UNINDICTED CO-CONSPIRATOR 1 is a personal friend of SAWYER.

3. A "money mule" is someone who knowingly or unknowingly transfers or moves fraudulently acquired money on behalf of someone else. Those who perpetuate fraudulent schemes often send money through money mules to obfuscate the criminal origins of the fraud proceeds.

4. The General Sessions Court Clerk is responsible for maintaining the records and funds of the General Sessions Court and provides support to 20 judges and 14 judicial commissioners.

5. As the General Sessions Court Clerk, SAWYER was an agent of Shelby County, Tennessee, and had a fiduciary duty to act in the best interests of and to provide honest services to Shelby County, Tennessee, and its citizens.

6. The Office of the General Sessions Court Clerk has access to multiple procurement credit cards for authorized expenses. Shelby County has procurement card policies that specifically prohibit non-cardholders from using procurement cards. Additionally, elected officials are not allowed to have procurement cards nor use the cards of other procurement card holders. Each purchase transaction must be authorized in advance by department management. The policies prohibit any purchases of a personal nature, as well as purchases made at bars, taverns, nightclubs, fast food restaurants, hotels, and restaurants. Any consulting or personal services that require the county to issue an IRS form are also prohibited.

7. Various Shelby County employees, including SAWYER, are issued travel cards for authorized travel expenses. Employees who routinely travel on County business and meet eligibility requirements may apply for a travel card through the County Finance Department. The travel card is an optional payment provision for employees traveling on behalf of the County. Charges made on these cards are the liability of the employee. The card is intended primarily to cover official travel-related costs of the traveler and not for personal charges of the official or employee.

8. Shelby County employees may receive travel advances—payments issued before official travel—to avoid the need to use a travel card. Any unused portion of a travel advance must be reimbursed to the County.

COUNT 1

Conspiracy to Commit Honest Services Wire Fraud – 18 U.S.C. § 1349

Paragraphs 1 through 8 are re-alleged and incorporated by reference as if fully set forth herein.

9. Between on or about August 29, 2024 and on or about June 22, 2025, in the Western District of Tennessee and elsewhere,

TAMARA SAWYER

the defendant, and others known and unknown, knowingly and willfully conspired and agreed, together and with each other to commit the offense of Honest Services Wire Fraud; that is, the defendant:

10. Pursuant to Title 18, United States Code, Section 1343 and 1346, devised and intended to devise a scheme and artifice to defraud and deprive Shelby County, Tennessee, and the citizens of Shelby County, Tennessee, of their right to the honest services of a public official, namely the honest services of SAWYER, an elected local official, by obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute such scheme and artifice, transmitted and caused to be transmitted in interstate and foreign commerce certain wire communications.

Object of the Conspiracy

11. It was the object of the conspiracy that SAWYER would steal and embezzle money belonging to the Office of the Shelby County General Sessions Clerk to unjustly enrich herself and others. The object of the conspiracy was to be accomplished by the following manner and means, among others:

Manner and Means

12. SAWYER obtained access to and used procurement cards belonging to three separate employees of the Office of the Shelby County General Sessions Clerk. Between on or about August 29, 2024 and on or about June 22, 2025,, SAWYER used those cards to pay for various personal expenses for herself and for her friends, including, alcohol, web based delivery services such as Uber Eats and Instacart, bars, hotels, restaurants, purchases with the Memphis Tigers, at FedEx Forum, Turo, local fundraisers, and transfers to various PayPal recipients. These charges were often on weekends or holidays when the Office of the Shelby County General Sessions Clerk was not open.

13. SAWYER also used the procurement cards to directly enrich herself by sending money to her own personal PayPal account. SAWYER also used the procurement cards as a part of a money mule scheme. She would send money to a PayPal account belonging to UNINDICTED CO-CONSPIRATOR 1's girlfriend, an account to which UNINDICTED CO-CONSPIRATOR 1 had access. SAWYER then gave instructions via iMessages and phone calls that UNINDICTED CO-CONSPIRATOR 1 was to keep a small amount of the money and send the rest back to SAWYER on a CashApp account, which was linked to SAWYER's personal bank account.

14. To account for the unauthorized expenses, SAWYER submitted false justifications back to the Office of the Shelby County General Sessions Clerk. SAWYER also falsely claimed that multiple receipts had been lost, despite the receipts still being available on various apps she used, including Uber Eats, Instacart, and PayPal. Finally, SAWYER manipulated multiple receipts that she then submitted for reimbursement to the

Office of the Shelby County General Sessions Clerk, falsely representing that these were legitimate receipts.

15. SAWYER did not follow Shelby County's policies on using the travel card or handling travel advances. In October 2024, SAWYER used the travel card for personal expenses and failed to pay the balance. Then, in January 2025 and June 2025, SAWYER received travel advances for authorized trips. Those trips were later cancelled, SAWYER did not travel, and SAWYER did not return the travel advance funds.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

Conspiracy to Commit Money Laundering – 18 U.S.C. § 1956(h)

13. The facts set forth in paragraphs 1 through 8 and 11 through 15 are re-alleged and incorporated by reference as if fully set forth herein.

14. From at least on or about August 29, 2024 and on or about June 22, 2025, in the Western District of Tennessee and elsewhere,

TAMARA SAWYER

the defendant, and others known and unknown, did knowingly combine, conspire and agree with each other to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, specifically, knowingly conducting and attempting to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Theft Concerning Programs Receiving Federal Funds in violation 18 U.S.C. § 666(a)(1)(A) as charged in Count 3 of the Indictment, knowing that the transactions were designed in whole or in part to promote the carrying on of the specified unlawful activity, and to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity; all in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and (a)(1)(B)(i). The manner and means used to accomplish the objectives of the conspiracy included, among others, all of the acts described in paragraphs 10 through 12 of this Indictment, all in violation of Title 18, United States Code, Section 1956(h).

COUNT 3

Theft Concerning Programs Receiving Federal Funds - 18 U.S.C. § 666(a)(1)(A)

15. The facts set forth in paragraphs 1 through 8 and 11 through 15 are re-alleged and incorporated by reference as if fully set forth herein.

16. Between on or about August 29, 2024 and on or about June 22, 2025, in the Western District of Tennessee and elsewhere,

TAMARA SAWYER

being an agent of Shelby County, Tennessee, a local government, said government receiving in calendar years 2024 and 2025, benefits in excess of $10,000 under federal programs involving grants, subsidies, loans, guarantees, insurance, and other forms of assistance, embezzled, stole, and without authority knowingly converted to the use of a person not the rightful owner, approximately $44,607.35, owned by, under the care of, under the custody of, and under the control of Shelby County, Tennessee, all in violation of Title 18, United States Code, Section 666(a)(1)(A).

COUNT 4

Honest Services Wire Fraud - 18 U.S.C. § 1343 and 1346

17. The facts set forth in paragraphs 1 through 8 and 11 through 15 are re-alleged and incorporated by reference as if fully set forth herein.

18. Between on or about August 29, 2024 and on or about June 22, 2025, in the Western District of Tennessee and elsewhere,

TAMARA SAWYER

devised and intended a scheme and artifice to defraud and deprive Shelby County, Tennessee, and the citizens of Shelby County, Tennessee, of the right to the honest services of a public official, namely, the honest services of SAWYER, an elected local official, by obtaining money by means of false and fraudulent pretense, representations, and promises, all in violation of Title 18, United States Code Sections 1343 and 1346.

COUNT 5

Money Laundering - 18 U.S.C. § 1956(a)(1)(A)(i) and (a)(1)(B)(i)

19. The facts set forth in paragraphs 1 through 8 and 11 through 15 are re-alleged and incorporated by reference as if fully set forth herein.

20. Between on or about August 29, 2024 and on or about June 22, 2025, in the Western District of Tennessee and elsewhere,

TAMARA SAWYER

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: sending unauthorized payments to UNINDICTED CO-CONSPIRATOR 1 from government procurement cards via PayPal, receiving payments back to SAWYER's personal banking account from UNINDICTED CO-CONSPIRATOR 1 via CashApp and other Peer to Peer (P2P) payment systems, and directing UNINDICTED CO-CONSPIRATOR 1 on how to make and receive those payments via iMessage and phone calls, which involved the proceeds of a specified unlawful activity, that is Theft Concerning Programs Receiving Federal Funds in violation 18 U.S.C. § 666(a)(1)(A) as charged in Count 3 of the Indictment, with the intent to promote the carrying on of and to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and (a)(1)(B)(i).

COUNT 6

Interstate and Foreign Travel in Aid of Racketeering Enterprises - 18 U.S.C. § 1952(a)(1) and (a)(3)

21. The facts set forth in paragraphs 1 through 8 and 11 through 15 are re-alleged and incorporated by reference as if fully set forth herein.

22. Between on or about August 29, 2024 and on or about June 22, 2025, in the Western District of Tennessee and elsewhere,

TAMARA SAWYER

used a facility in interstate and foreign commerce, namely, an iPhone and various web based services such as PayPal, CashApp, and other Peer to Peer (P2P) payment systems, with the intent to distribute the proceeds of an unlawful activity, namely, Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h) as charged in Count 2 of the Indictment and Money Laundering in violation of 18 U.S.C. §

1956(a)(1)(A)(i) and (a)(1)(B)(i) as charged in Count 5 of the Indictment, and thereafter performed and attempted to perform an act to distribute the proceeds of such unlawful activity and to otherwise promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of any unlawful activity, in violation of 18 United States Code Section 1952(a)(1) and (a)(3).

NOTICE OF FORFEITURE

Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under Section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by Section 981(a)(1)(C). The following property is subject to forfeiture in accordance with Section 982 and/or 2461(c):

a. All property which constitutes or is derived from proceeds of the violations set forth in this indictment;

b. All property involved in such violations or traceable to property involved in such violations; and

c. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) or (b) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a) and (b).

A TRUE BILL:

FOREPERSON

DATED: June 11, 2026

D. MICHAEL DUNAVANT
UNITED STATES ATTORNEY
WESTERN DISTRICT OF TENNESSEE

CROW

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UNITED STATES OF AMERICA,	)	FILED UNDER SEAL
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	)	**18 U.S.C. § 1343**
TAMARA SAWYER	)	**18 U.S.C. § 1346**
	)	**18 U.S.C. § 1349**
Defendant.	)	**18 U.S.C. § 1952(a)(1)**
	)	**18 U.S.C. § 1952(a)(3)**
	)	**18 U.S.C. § 1956(a)(1)(A)(i)**
	)	**18 U.S.C. § 1956(a)(1)(B)(i)**
	)	**18 U.S.C. § 1956(h)**

NOTICE OF PENALTIES

COUNTS 1 & 4

[nmt 20 yrs. imprisonment, nmt $250,000 fine, or both, nmt 3 yrs. supervised release, and a mandatory special assessment of $100, see 18 U.S.C § 3013(a).]

COUNTS 2 & 5

[nmt 20 yrs. imprisonment, nmt $500,000 fine or twice the value of the property involved in the transaction, whichever is greater, or both, nmt 3 yrs. supervised release, and a mandatory special assessment of $100, see 18 U.S.C § 3013(a).]

COUNT 3

[nmt 10 yrs. imprisonment, nmt $250,000 fine, or both, nmt 3 yrs. supervised release, and a mandatory special assessment of $100, see 18 U.S.C § 3013(a).]

COUNT 6

[nmt 5 yrs. imprisonment, nmt $250,000 fine, or both, nmt 3 yrs. supervised release, and a mandatory special assessment of $100, see 18 U.S.C § 3013(a).]