

1 GLENN B. McCORMICK  
Acting United States Attorney  
2 District of Arizona

3 PETER SEXTON  
Arizona State Bar No. 011089  
4 KRISTEN BROOK  
Arizona State Bar No. 023121  
5 LEIGHANN THOMAS  
Illinois State Bar No. 6327687  
6 Assistant U.S. Attorneys  
Two Renaissance Square  
7 40 N. Central Ave., Ste. 1800  
Phoenix, Arizona 85004  
8 Telephone: 602-514-7500  
Emails: Peter.Sexton@usdoj.gov  
9 Kristen.Brook@usdoj.gov  
LeighAnn.Thomas @usdoj.gov  
10 Attorneys for Plaintiff

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> LODGED
<input type="checkbox"/> RECEIVED	<input type="checkbox"/> COPY
NOV 23 2021	
CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY <u>                    </u>	DEPUTY

**SEALED**

11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE DISTRICT OF ARIZONA

13 United States of America,  
14  
15 Plaintiff,

16 v.

17 1. Willie Mitchell  
18 a.k.a. Blu Mitchell,  
19 (Counts 1-16)  
20 2. Erica Padilla,  
21 (Counts 1-16)  
22 Defendants.

No. **CR-21-00982-PHX-SPL**

**INDICTMENT**

VIO: 18 U.S.C. § 371  
(Conspiracy)  
Count 1  
  
18 U.S.C. § 1344  
(Bank Fraud)  
Count 2  
  
18 U.S.C. § 1957(a)  
(Transactional Money Laundering)  
Counts 3-16  
  
18 U.S.C. § 981(a)(1)(C);  
18 U.S.C. § 982(a)(1);  
21 U.S.C. § 853;  
28 U.S.C. § 2461(c)  
(Forfeiture Allegations)

25 THE GRAND JURY CHARGES:

26 INTRODUCTION

27 1. At all times relevant to this Indictment, defendants WILLIE MITCHELL,  
28 a.k.a. BLU MITCHELL, and ERICA PADILLA, purporting to do business as Sigma

1 College University Trade Schools, conspired and schemed, with each other and others, to  
2 prepare and submit a false and fraudulent Paycheck Protection Program (“PPP”) loan  
3 application to Western State Bank, a participating lender helping to provide government-  
4 backed, emergency financial assistance to businesses suffering from the economic impact  
5 of the Covid pandemic. Defendants submitted a loan application replete with false and  
6 fraudulent information, including fake employment data and fictitious payroll. As a result,  
7 defendants obtained \$526,500 in government-guaranteed loans, which were intended for  
8 real businesses actually harmed by the COVID-19 pandemic. After receiving the loan  
9 proceeds, defendants used the funds for personal expenses, disguised business expenses to  
10 enrich themselves and confederates, and transferred funds to various bank accounts they  
11 personally controlled.

#### 12 **SMALL BUSINESS ADMINISTRATION**

13 2. The United States Small Business Administration (“SBA”) was an executive-  
14 branch agency of the United States government that provided financial support to  
15 entrepreneurs and small businesses. The mission of the SBA was to maintain and  
16 strengthen the nation’s economy by enabling the establishment and viability of small  
17 businesses and by assisting in the economic recovery of communities after disasters. As  
18 part of this effort, the SBA facilitated loans through banks, credit unions, and other lenders.  
19 These loans had government-backed guarantees if certain requirements were met.

#### 20 **PAYCHECK PROTECTION PROGRAM BACKGROUND**

21 3. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a  
22 federal law enacted in March 2020 and was designed to provide emergency financial  
23 assistance to the millions of Americans suffering from the economic effects caused by the  
24 COVID-19 pandemic. One source of relief the CARES Act provided, through a program  
25 referred to as the Paycheck Protection Program (“PPP”), was authorization of up to \$349  
26 billion in potentially forgivable loans to small businesses for payroll, job retention,  
27 mortgage interest, rent/lease, utilities, and certain other applicable expenses.

28 4. The first phase of the PPP loan process was implemented between March

1 2020 and March 31, 2021. PPP loans had an interest rate of one percent. Loans issued  
2 prior to June 5, 2020, had a maturity of two years, while loans issued after June 5, 2020,  
3 had a maturity of five years. Each loan draw had a specific application process and  
4 requirements. SBA would forgive PPP loans if all employee retention criteria were met,  
5 and the funds were used for eligible expenses within a designated period as set forth in the  
6 PPP.

### 7 **PPP LOAN APPLICATION PROCESS**

8 5. The SBA oversaw the entire PPP and fully guaranteed every legitimate PPP  
9 loan. The individual PPP loans, however, were issued by private, SBA-approved lenders  
10 who received and processed the PPP applications. Thus, the loans were made from the  
11 lenders' own funds.

12 6. To apply for a PPP loan, a qualifying business was required to submit a PPP  
13 loan application to a participating lender. The lender then transmitted the relevant data for  
14 processing the loan to the SBA. This included the borrower's information, the total amount  
15 of the loan, and the listed number of employees.

16 7. In the PPP loan application (SBA Form 2483), the small business (through  
17 its authorized representative) had to verify its average monthly payroll, and the total  
18 number of employees. These figures were used to calculate the amount of money the  
19 business was eligible to receive under the PPP. The maximum PPP loan amount a business  
20 could receive was 2.5 times the business's average monthly payroll costs, up to \$10 million.

21 8. Thus, the PPP loan application required the business (through its authorized  
22 representative) to make several affirmative certifications. Among them, the authorized  
23 representative was required to certify that each of the following statements were true:

24 a. The Application business was in operation on February 15, 2020 and  
25 has employees for whom it paid salaries and payroll taxes or paid  
26 independent contractors, as reported on Internal Revenue Services  
27 ("IRS") Form(s) 1099-MISC;

28 b. The funds would be used to retain workers and maintain payroll or

1 make mortgage interest payments, lease payments, and utility  
2 payments, as specified under the PPP Rules; and

3 c. The information provided in the application and information provided  
4 in all supporting documents and forms was true and accurate in all  
5 material respects.

6 **PPP LOAN FORGIVENESS APPLICATION PROCESS**

7 9. Under the applicable PPP rules, the full principal of the PPP loan and any  
8 accrued interest was eligible for forgiveness if, during the 8-to-24-week period following  
9 loan disbursement, the business used the PPP loan on permissible business-related  
10 expenses, and used a certain portion of the loan proceeds towards payroll costs. To apply  
11 for loan forgiveness, the borrower was required to complete a Loan Forgiveness  
12 Application (SBA Form 3508) and submit it to its lender, or the lender that was servicing  
13 the PPP loan. The Loan Forgiveness Application then required the borrower to submit: (1)  
14 a PPP Loan Forgiveness Calculation Form; (2) PPP Schedule A; and (3) a Schedule A  
15 Worksheet.

16 10. At any time up to the maturity date of the loan, a borrower could apply for  
17 loan forgiveness so long as all the loan proceeds for which the borrower was requesting  
18 forgiveness had been used.

19 11. Borrowers were eligible for forgiveness of eligible payroll costs if at least  
20 60% of the loan proceeds were spent on actual payroll costs during the eight-week covered  
21 period. Borrowers were also eligible for forgiveness of nonpayroll costs such as mortgage  
22 payments, rent or lease payments, and utility payments. To be eligible, nonpayroll costs  
23 could not exceed 25% of the total forgiveness amount.

24 12. If borrowers did not apply for forgiveness within ten months after the last  
25 day of the covered period, then PPP loan payments were no longer deferred, and borrowers  
26 were required to repay their loans to their PPP lender.

27 13. Like the PPP loan application, the PPP Loan Forgiveness Application  
28 required the business (through its authorized representative) to make several affirmative

1 certifications. Among them, the business's authorized representative was required to  
2 certify the following statements were true:

- 3 a. The dollar amount for which forgiveness is requested "was used to  
4 pay costs that are eligible for forgiveness (payroll costs to retain  
5 employees; business mortgage interest payments; business rent or  
6 lease payments; or business utility payments)";
- 7 b. "The borrower understands that if the funds were knowingly used for  
8 unauthorized purposes, the federal government may pursue recovery  
9 of loan amounts and/or civil or criminal fraud charge"; and
- 10 c. "The information provided in this application and the information  
11 provided in all supporting documents and forms is true and correct in  
12 all material respects."

13 **DEFENDANTS AND RELATED ENTITY**

14 14. Sigma College University Trade Schools ("Sigma CUTS") was a business  
15 incorporated on or about June 14, 2018 in the State of Arizona. Sigma CUTS was  
16 incorporated by defendants as a "post-second education trade school".

17 15. Defendant WILLIE MITCHELL, a.k.a. BLU MITCHELL ("MITCHELL"),  
18 was a resident within the District of Arizona. As of May 25, 2021, MITCHELL was the  
19 statutory agent of Sigma CUTS. MITCHELL controlled a bank account with Mountain  
20 America Credit Union ("MACU") account #8412.

21 16. Defendant ERICA PADILLA ("PADILLA") was a resident within the  
22 District of Arizona. As of May 25, 2021, PADILLA was the CEO of Sigma CUTS.

23 **FINANCIAL INSTITUTION AND PARTICIPATING PPP LENDER**

24 17. Western State Bank is a financial institution headquartered in West Fargo,  
25 North Dakota, with branches located in the District of Arizona and whose deposits were  
26 insured by the Federal Deposit Insurance Corporation ("FDIC"). Western State Bank  
27 participated in the SBA's PPP as a lender, and as such, was authorized to lend funds to  
28 eligible borrowers under the terms of the PPP.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SIGMA CUTS PPP LOAN APPLICATION**

18. On or about January 13, 2021, defendants submitted a PPP application with Western State Bank on behalf of Sigma CUTS. PADILLA was listed as having 85% ownership in Sigma CUTS. In the application, defendants falsely represented that Sigma CUTS had an average monthly payroll of \$210,628, had 38 employees, and needed the PPP loan to support its ongoing operation. But the application was false. Sigma CUTS had no employees and no payroll.

19. As part of the application, defendant PADILLA signed as Sigma CUTS' authorized representative and signed next to each of the following certifications:

- a. Sigma CUTS “was in operation on February 15, 2020 and had employees for whom it paid salaries and payroll taxes or paid independent contractors, as reported on Form(s) 1099-MISC”;
- b. “The funds will be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments... [and] if the funds are knowingly used for unauthorized purposes, the federal government may hold [applicant] liable, such as for charges of fraud”; and
- c. “[T]he information provided in the application and in the information provided in all supporting documents and forms is true and accurate in all material respects.”

20. Each of these certifications was false. Defendants knew Sigma CUTS had zero employees and that it paid no salaries or payroll taxes to any employees or independent contractors.

21. Defendants also falsely and fraudulently represented that the funds sought in the Sigma CUTS application would be “used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments” when, in fact, they intended to divert the funds to their personal use and benefit.

22. Defendant PADILLA signed a promissory note with Western State Bank for

1 the PPP loan in the amount of \$526,500 that was to be disbursed via cashier's check.

2 23. The Sigma CUTS application included additional false and fraudulent  
3 information about its purported payroll, as well as fraudulent documentation purporting to  
4 establish that Sigma CUTS made substantial monthly payroll disbursements. For example:

5 a. The Sigma CUTS application included a fictitious payroll ledger  
6 purporting to show the monthly wages of 36 Sigma CUTS employees  
7 with an average monthly payroll of approximately \$213,619. In fact,  
8 at the time the Sigma CUTS application was filed on January 13,  
9 2021, the Arizona Department of Economic Security did not have any  
10 tax or wage reports for 2019 or 2020.

11 24. Despite these representations, it was not until the first quarter of 2021 that  
12 Sigma CUTS submitted, for the first time, seven employee wage submissions for a total of  
13 approximately \$16,756.22 in wages paid in the first quarter. During the second quarter of  
14 2021, defendants submitted thirteen employee wage submissions for a total of  
15 approximately \$147,933.27 in wages paid in the second quarter. Defendant MITCHELL  
16 was listed as an employee along with other individuals.

17 25. On or about January 28, 2021, Western State Bank approved Sigma CUTS'  
18 PPP application and funded the loan by issuing a cashier's check for \$526,500.

19 26. On or about June 10, 2019, defendants opened MACU account #8412.  
20 Defendant MITCHELL was the authorized signatory on the account.

21 27. On or about February 1, 2021, a cashier's check for \$526,500 for the Sigma  
22 CUTS PPP loan was deposited in MACU account #8412. At the time of the deposit, the  
23 account balance was approximately \$44,061.94.

24 28. Prior to the PPP loan deposit, MACU account #8412 showed no evidence of  
25 processing payroll. Only *after* the PPP loan deposit, did transactions through a payroll  
26 provider finally begin. Indeed, defendants issued payroll for the *first time* on March 24,  
27 2021, in anticipation of presenting this information to Western State Bank as part of a PPP  
28 Loan Forgiveness Application, which required that 60% of the funds be used on payroll



1 costs.

2 29. In sum, defendants' fraudulent representations are summarized as follows:

	<b>Before PPP Application</b>	<b>On PPP Application [Avg. Monthly]</b>	<b>After Loan Deposited [Avg. Jan.-Jun.]</b>
Payroll	\$0	\$210,628	\$27,449.75
# of Employees	0	38	7

3  
4  
5  
6  
7  
8 30. After the fraudulent loan proceeds were deposited into MACU account  
9 #8412, Sigma CUTS diverted and caused to be diverted some of the fraudulently obtained  
10 funds for personal and unauthorized purposes, including but not limited to:

- 11 a. On or about March 10, 2021, defendants wire transferred  
12 approximately \$430,906 from MACU account #8412 to Security Title  
13 Agency.
- 14 b. On or about March 17, 2021, defendants wire transferred  
15 approximately \$389,156 from MACU account #8412 to Stewart Title  
16 Agency.
- 17 c. On or about March 24, 2021, April 2, 2021, April 16, 2021, April 30,  
18 2021, May 14, 2021, May 28, 2021, June 11, 2021, June 25, 2021,  
19 July 9, 2021, July 23, 2021, August 6, 2021, and August 20, 2021,  
20 defendants caused other withdrawals to be processed for fictitious  
21 payroll.

22  
23 **COUNT 1**  
24 **Conspiracy**  
25 **[18 U.S.C. § 371]**

26 31. The factual allegations in the preceding paragraphs are incorporated by  
27 reference and re-alleged as though fully set forth herein.

28 32. Beginning on or about January 2021, and continuing through on or about the  
date of the Indictment, in the District of Arizona and elsewhere, defendants MITCHELL



1 and PADILLA, did conspire, confederate, and agree with each other and others known and  
2 unknown to the Grand Jury, to willfully and knowingly devise a scheme and artifice to  
3 defraud Western State Bank and the United States Small Business Administration by  
4 means of false and fraudulent pretenses, representation, and promises, including preparing  
5 and submitting a false and fraudulent PPP loan application in order to obtain \$526,500 in  
6 government-guaranteed loans through the PPP.

7 **OBJECT OF THE CONSPIRACY**

8 33. It was the object of the conspiracy for defendants MITCHELL and  
9 PADILLA, and their co-conspirators, to commit bank fraud in violation of 18 U.S.C. §  
10 1344, and transactional money laundering in violation of 18 U.S.C. § 1957.

11 **MANNER AND MEANS OF THE CONSPIRACY AND FRAUD SCHEME**

12 34. The manner and means by which the defendants sought to accomplish the  
13 objectives of the conspiracy and fraud scheme included, among other things, the following:

- 14 a. Defendants included a fictitious payroll ledger purporting to show monthly  
15 wages of 36 Sigma CUTS employees, with an average monthly payroll of  
16 approximately \$213,619. In fact, at the time the Sigma CUTS application  
17 was filed, Sigma CUTS had zero employees and no monthly payroll  
18 expenses.
- 19 b. Defendants falsely represented that Sigma CUTS needed the PPP loan to  
20 support its ongoing operation. In fact, at the time the Sigma CUTS  
21 application was filed, Sigma CUTS was not doing any business and had no  
22 ongoing operations.
- 23 c. After the PPP loan was deposited, defendants set up a phony company  
24 payroll with a payroll provider - and funded it with fraudulent loan proceeds  
25 - to issue fraudulent biweekly payroll disbursements to fictitious employees  
26 in a fraudulent attempt to be eligible for PPP loan forgiveness.
- 27 d. Defendants transferred some fraudulent proceeds from a separate fraudulent  
28 PPP loan (World Media Entertainment Enterprises, Inc) into the Sigma

1 CUTS account to co-mingle fraudulent proceeds from both frauds for the  
2 purchase of real estate. The two properties were: (1) 20147 E. San Tan Blvd.,  
3 Queen Creek, AZ; and (2) 6012 A St., Tacoma, WA. Before the Arizona  
4 property was purchased from a wire transfer of \$430,906.43 out of the Sigma  
5 CUTS account on March 10, 2021, defendants transferred into the Sigma  
6 CUTS account \$150,000.00 (February 11) and \$215,000.00 (March 10) from  
7 the World Media account #9508 with Mountain America Credit Union.  
8 Those two transfers were insufficient to cover the purchase of the Arizona  
9 property without using additional fraudulent funds obtained by the Sigma  
10 CUTS PPP fraud. The same is true for the Washington property. Before the  
11 Washington property was purchased from a wire transfer of \$389,155.98 out  
12 of the Sigma CUTS account on March 17, 2021, defendants transferred into  
13 the Sigma CUTS account \$300,000.00 (March 17) from the World Media  
14 account #9508 with Mountain America Credit Union. That transfer was  
15 insufficient to cover the purchase of the Washington property without using  
16 additional fraudulent funds obtained by the Sigma CUTS PPP fraud.

#### 17 OVERT ACTS

18 35. In furtherance of the conspiracy, and to effect the objects thereof, the  
19 following overt acts, among others, were committed in the District of Arizona, and  
20 elsewhere:

- 21 a. On or about January 13, 2021, defendants prepared and submitted, or caused  
22 to be prepared and submitted, a fraudulent PPP application for Sigma CUTS  
23 that was submitted to Western State Bank. Among other things, the PPP  
24 application included false representations about Sigma CUTS' number of  
25 employees and average monthly payroll.
- 26 b. On or about March 10, 2021, defendants caused approximately \$430,906 of  
27 fraudulently procured PPP loan proceeds from this PPP fraud and another  
28 PPP fraud, to be combined and wire transferred from MACU account #8412

1 to Security Title Agency for the purchase of real property located at 20147  
2 E. San Tan Blvd., Queen Creek, Arizona 85142.

3 c. On or about March 17, 2021, defendants caused approximately \$389,156 of  
4 fraudulently procured PPP loan proceeds from this PPP fraud and another  
5 PPP fraud, to be combined and wire transferred from MACU account #8412  
6 to Stewart Title Agency for the purchase of real property located at 6012 A  
7 St. Tacoma, Washington, 98404.

8 d. On or about March 24, 2021, April 2, 2021, April 16, 2021, April 30, 2021,  
9 May 14, 2021, May 28, 2021, June 11, 2021, June 25, 2021, July 9, 2021,  
10 July 23, 2021, August 6, 2021, and August 20, 2021, defendants caused  
11 withdrawals from the \$526,500 fraudulently procured PPP loan to be  
12 processed to a payroll provider for fictitious payroll.

13 All in violation of Title 18, United States Code, Section 371.

14  
15 **COUNT 2**  
16 **Bank Fraud**  
17 **[18 U.S.C. § 1344]**

18 36. The factual allegations in the preceding paragraphs of this Indictment are re-  
19 alleged and incorporated as though fully set forth herein.

20 37. On or about the date set forth below, in the District of Arizona and elsewhere,  
21 defendants MITCHELL and PADILLA, and others known and unknown to the Grand Jury,  
22 did knowingly execute a scheme and artifice to defraud Western State Bank, the deposits  
23 of which were insured by the Federal Deposit Insurance Corporation, and to obtain, by  
24 means of materially false and fraudulent pretenses, representations, and promises, moneys,  
25 funds, credits, assets, securities, and other property owned by and under the custody and  
26 control of Western State Bank, and caused Western State Bank to issue a cashier's check  
27 for deposit into an account controlled by the defendants.  
28

Count	Date	Monetary Transaction	Transaction Amount	Institution
2	2/1/2021	Deposit by cashier's check of PPP Loan Funds	\$526,500	MACU Bank account #8412

All in violation of Title 18, United States Code, Section 1344.

**COUNTS 3-16**  
**Transactional Money Laundering**  
**[18 U.S.C. § 1957(a)]**

38. The factual allegations in the preceding paragraphs of this Indictment are alleged and incorporated as though fully set forth herein.

39. On or about the dates listed below, in the District of Arizona and elsewhere, defendants MITCHELL and PADILLA, and others known and unknown to the Grand Jury, knowingly engaged in monetary transactions, of a value greater than \$10,000, occurring within the United States, with funds criminally derived from the bank fraud alleged in Count 2 of this Indictment, with each transaction being a separate count of this Indictment:

Count	Date	Monetary Transaction	Transaction Amount (Approx.)
3	3/10/2021	Withdrawal from MACU account #8412 to Security Title Agency	\$430,906.43
4	3/17/2021	Withdrawal from MACU account #8412 to Stewart Title Agency	\$389,156.98
5	3/24/2021	Withdrawal from MACU account #8412 to a payroll provider	\$18,528.26
6	4/2/2021	Withdrawal from MACU account #8412 to a payroll provider	\$18,625.91
7	4/16/2021	Withdrawal from MACU account #8412 to a payroll provider	\$18,719.98
8	4/30/2021	Withdrawal from MACU account #8412 to a payroll provider	\$22,211.78
9	5/14/2021	Withdrawal from MACU account #8412 to a payroll provider	\$22,748.31
10	5/28/2021	Withdrawal from MACU account #8412 to a payroll provider	\$23,863.93
11	6/11/2021	Withdrawal from MACU account #8412 to a payroll provider	\$24,383.72

12	6/25/2021	Withdrawal from MACU account #8412 to a payroll provider	\$25,127.69
13	7/9/2021	Withdrawal from MACU account #8412 to a payroll provider	\$29,414.78
14	7/23/2021	Withdrawal from MACU account #8412 to a payroll provider	\$28,965.11
15	8/6/2021	Withdrawal from MACU account #8412 to a payroll provider	\$29,821.78
16	8/20/2021	Withdrawal from MACU account #8412 to a payroll provider	\$32,429.77

All in violation of Title 18, United States Code, Section 1957(a).

**FORFEITURE ALLEGATION**

**[18 U.S.C. § 981(a)(1)(C); 18 U.S.C. § 982(a)(1);  
21 U.S.C. § 853; 28 U.S.C. § 2461(c)]**

40. The factual allegations in Counts 1 through 16 in the preceding paragraphs of this Indictment are re-alleged and incorporated as though fully set forth herein.

41. Pursuant to Title 18, United States Code, Sections 981 and 982, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c), and upon conviction of one or more of the offenses alleged in Counts 1 through 16 of this Indictment, defendant(s) shall forfeit to the United States all right, title, and interest in any and all property, real or personal, involved in such offense(s), or any property traceable to such property involved in the offense(s), or conspiracy to commit such offense(s), including the following: (a) all money or other property that was the subject of each transaction, transportation, transmission or transfer in violation of a statute listed in Title 18, United States Code, Section 982, (b) all other property constituting proceeds obtained as a result of those violations, and (c) all property used in any manner or part to commit or to facilitate the commission of those violations including, but not limited to the sum of money representing the amount of money involved in the offense(s) and the property named below:

A sum of money equal to at least \$526,500.00 in United States currency, representing the amount of money involved in the offenses.

1 The real property located at 20147 E. San Tan Blvd., Queen Creek, Arizona 85142  
2 and 6012 A St., Tacoma, Washington 98404.

3 If any of the above-described forfeitable property, as a result of any act or omission  
4 of the defendant(s):

5 (1) cannot be located upon the exercise of due diligence,

6 (2) has been transferred or sold to, or deposited with, a third party,

7 (3) has been placed beyond the jurisdiction of the court,

8 (4) has been substantially diminished in value, or

9 (5) has been commingled with other property which cannot be divided without  
10 difficulty,

11 it is the intent of the United States to seek forfeiture of any other property of said  
12 defendant(s) up to the value of the above-described forfeitable property, pursuant to Title  
13 21, United States Code, Section 853(p).

14 All in accordance with Title 18, United States Code, Sections 981 and 982, Title 21,  
15 United States Code, Section 853, Title 28, United States Code, Section 2461(c), and Rule  
16 32.2, Federal Rules of Criminal Procedure.

17  
18 A TRUE BILL

19 s/  
20 FOREPERSON OF THE GRAND JURY  
Date: November 23, 2021

21 GLENN B. McCORMICK  
22 Acting United States Attorney  
23 District of Arizona

24 s/  
LEIGHANN THOMAS  
25 KRISTEN BROOK  
26 PETER SEXTON  
Assistant U.S. Attorneys