

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

SEP 25 2024

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

v.

CR 24 526

MMC

JESSICA ENGLE

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1163 – Embezzlement and Theft from Indian Tribal Organization

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

18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 24th day of

September 2024

S. Ybarra

Clerk



Bail, \$ Warrant

Hon. Alex G. Tse, U.S. Magistrate Judge

UNDER SEAL

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

FILED

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CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

MMC

CR 24 5204

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JESSICA ENGLE,

15 Defendant.

) CASE NO.

) VIOLATION:

) 18 U.S.C. § 1163 – Embezzlement and Theft from
Indian Tribal Organization

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

) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
Forfeiture Allegations

) SAN FRANCISCO VENUE

20 INDICTMENT

UNDER SEAL

21 The Grand Jury charges:

22 COUNT ONE: (18 U.S.C. § 1163 – Embezzlement and Theft from Indian Tribal Organization)

23 Beginning in or about July 2021, and continuing to in or about May 2022, in the Northern District
24 of California, the defendant,

25 JESSICA ENGLE,

26 being an officer and employee of an Indian tribal organization, that is, the Chief Executive Officer of the
27 Yurok Telecommunications Corporation, a wholly owned subsidiary of the Yurok Tribe, an Indian
28 Tribal organization, knowingly embezzled, stole, converted to her own use and gain, and willfully

INDICTMENT

1 misapplied money, funds, and assets, of the approximate value \$579,574, belonging to Yurok
2 Telecommunications Corporation, a wholly owned subsidiary of the Yurok Tribe, an Indian Tribal
3 organization, and entrusted to the custody and care of officers, employees, and agents of the Indian tribal
4 organization, the value of which was over \$1,000. Yurok Telecommunications and the Yurok Tribe are
5 subject to the laws of the United States relating to Indian affairs and Yurok Telecommunications
6 Corporation is a corporation, association, or group which is organized under any of such laws.

7 All in violation of Title 18, United States Code, Section 1163.

8
9 COUNT TWO: (18 U.S.C. § 666(a)(1)(A) – Theft or Bribery Concerning Programs Receiving
10 Federal Funds)

11 Beginning in or about July 2021, and continuing to in or about May 2022, in the Northern
12 District of California, the defendant,

13 JESSICA ENGLE,

14 being the Chief Executive officer of Yurok Telecommunications Corporation and thus an agent of an
15 Indian tribal government and an agency of an Indian tribal government, specifically the Yurok
16 Telecommunications Corporation, a wholly owned subsidiary of the Yurok Tribe, an Indian Tribal
17 government subject to the laws of the United States relating to Indian affairs, said government and
18 agency receiving in the one year period beginning September 1, 2021, benefits in excess of \$10,000
19 from Federal agencies such as the Bureau of Indian Affairs and the Department of Agriculture,
20 embezzled, stole, obtained by fraud, without authority knowingly converted to the use of a person not
21 the rightful owner, and intentionally misapplied property worth at least \$5,000 and owned by, under the
22 care of, under the custody of, and under the control of such government and agency, that is,
23 approximately \$579,574, all in violation of 18 U.S.C. § 666(a)(1)(A).

24
25 FORFEITURE ALLEGATION: (18 U.S.C. §§ 981, 982; 28 U.S.C. § 2461)

26 The allegations contained in of this Indictment are re-alleged and incorporated by reference for the
27 purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981, 982, and Title 28,
28 United States Code, Section 2461.

1 Upon conviction of any offense alleged above in this Indictment, the defendant,

2 JESSICA ENGLE,

3 shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and
4 982(a)(3), and Title 28, United States Code, Section 2461(c), any property, real or personal, which
5 constitutes or is derived from proceeds traceable to the offense, including but not limited to a forfeiture
6 money judgment and the following:

- 7 a. \$579,574, belonging to Yurok Telecommunications Corporation embezzled, stole,
8 obtained by fraud, converted, and misapplied from Yurok Telecommunication's
9 U.S. Bank account.

10 If any of the property described above, as a result of any act or omission of the defendant:

- 11 a. cannot be located upon exercise of due diligence;
- 12 b. has been transferred or sold to, or deposited with, a third party;
- 13 c. has been placed beyond the jurisdiction of the court;
- 14 d. has been substantially diminished in value; or
- 15 e. has been commingled with other property which cannot be divided without
16 difficulty,

17 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
18 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

19 All pursuant to Title 18, United States Code, Sections 981 and 981, and Title 28, United States
20 Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

21 DATED: September 24, 2024

A TRUE BILL.

22
23 /s/ Foreperson
FOREPERSON

24 ISMAIL J. RAMSEY
25 United States Attorney

26
27 Josiah Bournes
JOSIAH BOURNES
28 Assistant United States Attorney