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**IN THE THIRD JUDICIAL DISTRICT COURT IN AND FOR  
SALT LAKE COUNTY, STATE OF UTAH**

<p><b>THE STATE OF UTAH,</b></p> <p style="text-align: center;">Plaintiff,</p> <p>Vs.</p> <p><b>JORDAN BLACKWELL SCHNEIMAN,</b> DOB: June 23, 1979</p> <p style="text-align: center;">Defendant.</p>	<p><b>CRIMINAL INFORMATION</b></p>  <p>Case No. _____</p> <p>Judge _____</p>
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The undersigned states upon information and belief that the above-identified defendant has committed the following crimes:

**COUNT 1**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Mystique houseboat, \$20,000 transfer)**

Commencing on or about May 29<sup>th</sup>, 2018, and continuing through about May 30<sup>th</sup>, 2018, in the State of Utah, the defendant dealt with property that had been entrusted to him as a

fiduciary in a manner that he knew was a violation of his duty and which involved substantial risk of loss or detriment to the owner or person for whose benefit the property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$20,000 from the Mystique Houseboat, LLC Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Mystique houseboat's care. Knowing that it was a violation of his duty, the defendant put the funds at risk by commingling them with other funds in a general business account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Mystique houseboat. This resulted in substantial risk of loss or detriment to the Mystique houseboat's owners.

**COUNT 2**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Mystique houseboat, \$11,000 transfer)**

Commencing on or about August 2<sup>nd</sup>, 2018, and continuing through about August 3<sup>rd</sup>, 2018, in the State of Utah, the defendant dealt with property that had been entrusted to him as a fiduciary in a manner that he knew was a violation of his duty and which involved substantial risk of loss or detriment to the owner or person for whose benefit the property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$11,000 from the Mystique Houseboat, LLC Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Mystique houseboat's care. Knowing that it was a violation of his duty,

the defendant put the funds at risk by commingling them with other funds in a general business account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Mystique houseboat. This resulted in substantial risk of loss or detriment to the Mystique houseboat's owners.

**COUNT 3**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Enigma houseboat, \$21,700 transfer)**

Commencing on or about August 2<sup>nd</sup>, 2018, and continuing through about August 3<sup>rd</sup>, 2018, in the State of Utah, the defendant dealt with property that had been entrusted to him as a fiduciary in a manner that he knew was a violation of his duty and which involved substantial risk of loss or detriment to the owner or person for whose benefit the property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$21,700 from the Enigma Houseboat, LLC Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Enigma houseboat's care. Knowing that it was a violation of his duty, the defendant put the funds at risk by commingling them with other funds in a general business account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Enigma houseboat. This resulted in substantial risk of loss or detriment to the Enigma houseboat's owners.

**COUNT 4**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Titan houseboat, \$14,500)**

Commencing on or about August 2<sup>nd</sup>, 2018, and continuing through about August 3<sup>rd</sup>, 2018, in the State of Utah, the defendant dealt with property that had been entrusted to him as a fiduciary in a manner that he knew was a violation of his duty and which involved substantial risk of loss or detriment to the owner or person for whose benefit the property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$14,500 from the Titan Houseboat, LLC Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Titan houseboat's care. Knowing that it was a violation of his duty, the defendant put the funds at risk by commingling them with other funds in a general business account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Titan houseboat. This resulted in substantial risk of loss or detriment to the Titan houseboat's owners.

**COUNT 5**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Intrepid houseboat, \$6,000 transfer)**

On or about May 22<sup>nd</sup>, 2018, in the State of Utah, the defendant dealt with property that had been entrusted to him as a fiduciary in a manner that he knew was a violation of his duty and which involved substantial risk of loss or detriment to the owner or person for whose benefit the

property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$6,000 from the Intrepid Houseboat, LLC Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Intrepid houseboat's care. Knowing that it was a violation of his duty, the defendant put the funds at risk by commingling them with other funds in a general business account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Titan houseboat. This resulted in substantial risk of loss or detriment to the Titan houseboat's owners.

**COUNT 6**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Evolution houseboat, \$8,500 transfer)**

Commencing on or about May 13<sup>th</sup>, 2018, and continuing through about May 16<sup>th</sup>, 2018, in the State of Utah, the defendant dealt with property that had been entrusted to him as a fiduciary in a manner that he knew was a violation of his duty and which involved substantial risk of loss or detriment to the owner or person for whose benefit the property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$8,500 from the Evolution Houseboat, LLC Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Evolution houseboat's care. Knowing that it was a violation of his duty, the defendant put the funds at risk by commingling them with other funds in a general business

account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Evolution houseboat. This resulted in substantial risk of loss or detriment to the Evolution houseboat's owners.

**COUNT 7**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Desert Dream houseboat, \$5,000 transfer)**

Commencing on or about November 16<sup>th</sup>, 2017, and continuing through about November 17<sup>th</sup>, 2017, in the State of Utah, the defendant dealt with property that had been entrusted to him as a fiduciary in a manner that he knew was a violation of his duty and which involved substantial risk of loss or detriment to the owner or person for whose benefit the property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$5,000 from the Desert Dream Houseboat, Inc. Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Desert Dream houseboat's care. Knowing that it was a violation of his duty, the defendant put the funds at risk by commingling them with other funds in a general business account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Desert Dream houseboat. This resulted in substantial risk of loss or detriment to the Desert Dream houseboat's owners.

**COUNT 8**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Desert Dream Houseboat, \$6,000 transfer)**

On or about June 13<sup>th</sup>, 2018, in the State of Utah, the defendant dealt with property that had been entrusted to him as a fiduciary in a manner that he knew was a violation of his duty and which involved substantial risk of loss or detriment to the owner or person for whose benefit the property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$6,000 from the Desert Dream Houseboat, Inc. Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Desert Dream houseboat's care. Knowing that it was a violation of his duty, the defendant put the funds at risk by commingling them with other funds in a general business account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Desert Dream houseboat. This resulted in substantial risk of loss or detriment to the Desert Dream houseboat's owners.

**COUNT 9**  
**UNLAWFUL DEALING OF PROPERTY BY A FIDUCIARY**  
*a second degree felony*  
**(Desert Dream houseboat, \$14,250 transfer)**

Commencing on or about January 23<sup>rd</sup>, 2019, and continuing through about January 24<sup>th</sup>, 2019, in the State of Utah, the defendant dealt with property that had been entrusted to him as a fiduciary in a manner that he knew was a violation of his duty and which involved substantial

risk of loss or detriment to the owner or person for whose benefit the property was entrusted, in violation of §76-6-513, Utah Code, and the value of the entrusted property is or exceeds \$5,000, to wit: the defendant withdrew \$14,250 from the Desert Dream Houseboat, Inc. Homeowner's Association bank account from funds that had been entrusted to him as a fiduciary for the purpose of managing the Desert Dream houseboat's care. Knowing that it was a violation of his duty, the defendant put the funds at risk by commingling them with other funds in a general business account and/or transferring them to one or more accounts associated with other houseboats under his care, and by spending the entrusted funds for purposes unrelated to the Desert Dream houseboat. This resulted in substantial risk of loss or detriment to the Desert Dream houseboat's owners.

**COUNT 10**  
**PATTERN OF UNLAWFUL ACTIVITY**  
*a second degree felony*

Commencing in or about January, 2015 and continuing through about February, 2019, in the State of Utah, the defendant engaged in conduct which constituted the commission of at least three episodes of unlawful activity as defined in Utah Code Ann. §76-10-1603, and: (1) received proceeds derived, directly or indirectly, from a pattern of unlawful activity in which the defendant participated as a principal, including but not limited to Counts 1 through 9 above, and used or invested, directly or indirectly, any part of that income, or the proceeds derived from the investment or use of those proceeds, in the acquisition of any interest in, or establishment or operation of, any enterprise; or, (2) through a pattern of unlawful activity, including but not limited to Counts 1 through 9 above, acquired or maintained, directly or indirectly, any interest



in or control of any enterprise; or, (3) was employed by or associated with any enterprise and conducted or participated, whether directly or indirectly, in the conduct of that enterprise's affairs through a pattern of unlawful activity, including but not limited to Counts 1 through 9 above; or, (4) conspired to commit (1), (2), or (3) above, to wit: the defendant unlawfully dealt with funds entrusted to him as a fiduciary by numerous houseboat owners in a pattern of conduct that spanned several years. The defendant used the funds that he received through this pattern of conduct to operate and maintain control of his houseboat management business, Lakepoint Management, LLC.

EXECUTED on this 28th day of DECEMBER, 2020.

/s/ Eric T. Varoz  
ERIC T. VAROZ, Affiant  
(signature affixed with permission)

AUTHORIZED FOR PRESENTMENT AND FILING this 28th day of  
DECEMBER, 2020.

/s/ Wayne D. Jones  
WAYNE D. JONES  
Assistant Attorney General  
(signature affixed with permission)