

AG2023-324//PC Statement

Candace Elexzandria Lierd

██████████1986

SID 231794272

DL ██████████

SSN ██████████

██████████████████████████████ Lehi, UT 84043

506//160

Background and Identification of Defendant

The defendant has engaged in a pattern of unlawful activity, including, among other things, the crimes of communications fraud, theft, theft by deception, theft of services, identity fraud, forgery and unlawful conduct, and her alleged criminal activities were referred for investigation.

On June 15, 2023, I was assigned to investigate allegations of fraudulent financial activity relating to Exitus, a Utah non-profit corporation at ██████████ Lehi, UT and Candace E. Lierd DOB ██████████-1986, formerly known as Candace E. Rivera (referred to as Candace here forward) of ██████████ Lehi, UT.

I located a web page for Exitus, <https://joinexitus.org>, as well as a website for CR House & Company, an apparent business being run by Candace, <https://crhousecompany.com>, and <https://candacerivera.com>, a site in which Candace offers paid services.

Exitus' website lists "Candace R." as the founder of the anti-human trafficking organization. Exitus is identified as a non-profit organization with an EIN of ██████████ listed at the bottom of the website. Exitus was soliciting donations on their website at the time of review (June 15, 2023). I also identified Facebook and Instagram pages belonging to Exitus. Both social media pages appeared to document the organization's work in orphan rescues in Europe and solicited donations toward that effort.

I observed that Exitus was a registered business in Utah from August 7, 2020 until its expiration for "failure to file renewal" on December 27, 2022. The corporate filings listed Candace and J.B. as directors of Exitus.

CR House & Company is represented as a "branding house" established in 2020 by "CEO/Founder Candace Rivera." The site offers several paid services and is reported to have been featured on major networks like CNN, Fox News, and BBC among others. I observed no business filings by CR House & Company in Utah.

CR House's webpage also contained a link to a series of 8 podcasts titled "Welcome to My House with Candace Rivera." One of those Podcasts, entitled "Jon Lines," described Candace and Exitus' anti-human trafficking efforts during NBA All-Star weekend in Salt Lake City (February 17-19, 2023). During that podcast, it was revealed that Exitus became officially involved in the United States Department of Homeland Security Investigations (HSI) anti-human trafficking taskforce as a victim service provider.

Upon review of <https://candacerivera.com>, I observed a photo of Candace on the website's main page. The site offered services for speaking, "coaching&consulting," classes, and "DE&I and Business Dev."

I compared a photo of "Candace R." and "Candace Rivera" from the joinexitus.org, candacerivera.com, and crhousecompany.com websites to a known UCJIS photograph of Candace Lierd and was able to confirm the identity of "Candace Rivera" and "Candace R" as Candace Lierd. I did confirm that Candace was charged with felony fraud in the Provo branch of the 4th District Court (case no. 231401782) related to an over \$8,000 fraudulent check written to a vendor for services rendered during a 2022 event hosted by Exitus.

On June 29, 2023 I was present in the 4th District Courtroom when Candace's felony fraudulent check case was called before Hon. Christine Johnson. I observed Candace attend the hearing via WebEx. Candace stated that she split her time between Utah and South Carolina due to the requirements of her work and was appearing via WebEx because she was out of state. I was able to affirm the identity of the person appearing in 4th district court on the felony case and person depicted on the aforementioned websites was that of the same individual; Candace Lierd.

Utilizing open source records, I located probable addresses for Candace in Utah, Texas, New Jersey, Alaska, and Colorado.

Queries of Utah's Department of Professional Licensing revealed no record of Candace ever being licensed as a nurse practitioner, medical doctor, or registered nurse in the State of Utah. I did observe four separate applications to become a Registered Nurse in Utah under Candace's name. All four were denied. One of the denied applications was listed as being reviewed under interstate compact. This denied application listed Candace as a graduate of Nightingale College of Nursing with an Associate's Degree in Nursing on 04-24-2015.

Upon searching equivalent licensing bodies in Texas, New Jersey, Alaska, and Colorado, I located no record of Candace being licensed as a nurse practitioner, medical doctor, or registered nurse in these states. A search of the Nursys (ncsbn.org) national nurse license verification database revealed no record of Candace ever holding a license as a registered nurse in any state.

During this investigation, current and former board members listed on Exitus' corporate filings were interviewed. It was discovered that no person, except Candace, had access to the Exitus MACU or JP Morgan Chase Bank accounts.

Each Exitus board or staff member interviewed understood Exitus mission to relate to anti-human trafficking and/or overseas orphan rescues and human trafficking victim services. No member recalled permitting, approving, voting for, or otherwise granting Candace authority to draw a salary from Exitus' business accounts. The board also did not approve or permit Candace to withdraw large sums of cash from Exitus accounts for any purpose other than to conduct Exitus business. No board member, either individually or as a board, ever approved or permitted Candace to use Exitus funds or Exitus bank accounts toward the purchase of her home or vehicle.

1. Pattern of unlawful acts, 76-10-1603- 2nd Felony

From September 10, 2020 to present date, Candace Lierd (Candace) misrepresented herself as a licensed registered nurse, medical doctor, and nurse practitioner. Candace falsely stated that she held a position with the United Nations and was featured on BBC News. Candace also falsely asserted she was a successful business owner who has founded several multi-million dollar companies.

Candace leveraged her fraudulent representations to gain the confidence of founding partners, board members, medical professionals, volunteers, media companies, benevolent organizations, and individual donors to establish the enterprise of Exitus as a non-profit organization and generate funds under the

enterprise's name. Candace's representations of her credentials and professional positions also encouraged partnerships with law enforcement agencies and the extraordinary handling of law enforcement calls to which she was party.

Based on the misleading and fraudulent representations made by Candace, the Exitus non-profit corporation raised more than \$1,697,000 dollars since its founding in 2020 between individual donors, corporate donations, international wire transfers from foreign businesses to Exitus bank accounts, unknown wire transfers to Exitus bank accounts, Venmo donations, PayPal donations, Square payment processing, and Stripe payment processing.

In addition, Candace used false representation that she was a licensed registered nurse, medical doctor, and nurse practitioner and her founding of Exitus as a vehicle to generate business in her private ventures, establishing the enterprise of CR House & Co., where she entered business contracts with at least two individuals, totaling \$8,702.55 in revenue and \$29,600 in unsettled payments.

2. Unlawful conduct, Utah Code 58-1-501(1)(a) and 58-31b-503 - 3rd Felony

On January 4, 2021 Candace is featured on a video presentation for the BYU Anti-Human Trafficking Club video wherein Candace states she falsely represents herself as "Nurse Practitioner" and founder of Exitus. Candace has never held a license as a Nurse Practitioner in any state she has lived, nor any academic credential to support the attainment of a Ph. D or master's degree.

3. Unlawful conduct, Utah Code 58-1-501(1)(a) and 58-31b-503 - 3rd Felony

On or about April 2023, Candace solicited the assistance of Utah registered nurse S.S. to assist in coordinating the medical transport of an orphan in Ukraine to an adoptive family in the United States. Candace falsely told S.S. that she was a nurse practitioner. Candace gave S.S. medical directives for the care of the child. Candace provided S.S. with controlled substances in a medical kit, which included Ketamine and Haldol.

S.S. later discovered that Candace was not a nurse practitioner and provided messages between S.S. and staff at Global Adoption Services relating to additional misrepresentations about Candace's license to practice nursing.

4. Unlawful conduct, Utah Code 58-1-501(1)(a) and 58-31b-503 - 3rd Felony

On or about December 2021, V.B., a North Carolina registered nurse, was contacted by Studinger who introduced Candace as someone seeking V.B.'s assistance for medical transports for Exitus. Candace falsely told Bitterman that she was a nurse practitioner. In February 2022, V.B. travelled to Ukraine to assist a medically needy orphan with transport to an adoptive family in the United States. During this trip, Candace provided V.B. with questionable medical directives relating to the child's colostomy bag, directives which would have been harmful to the child if executed by V.B.

5. Unlawful conduct, Utah Code 58-1-501(1)(a) and 58-31b-503 - 3rd Felony

On or about January 2021 J.B. was approached by Candace to build a webpage for Exitus and assume a seat on the Exitus board. J.B. was a coworker of Candace's at Calculated Research Group. J.B. stated he was told by Candace that her professional background was as a registered nurse who worked as an RN "at will" to maintain her license. Candace falsely told J.B. that she worked as an RN at either the University of Utah or the Veterans Affairs hospital in Salt Lake City.

There is no record of Candace being licensed as registered nurse in Utah. Employment records confirm that Candace was employed at the University of Utah hospital from April 25, 2011 to March 6, 2012 as a "Psychiatric Technician" and that her "termination was an involuntary dismissal."

6. Unlawful conduct, Utah Code 58-1-501(1)(a) and 58-31b-503 - 3rd Felony

E.S. worked with Candace in 2011 at the University of Utah hospital, where both served as Psychiatric Technicians. E.S. lost contact with Candace after employment at the University of Utah hospital ended but was contacted by her again on or about January 2021. Candace falsely told E.S. that she graduated from the University of Utah, was now a registered nurse, and began a non-profit organization called Exitus. Candace solicited E.S., who is a member of the Navajo Nation, for contacts with tribal nation leaders. Candace later met with tribal nation leaders to solicit donations for Exitus' work with a missing and murdered indigenous women effort. Silvers, who became Exitus' liaison for the tribal nations, later learned that no such effort to rescue or seek justice for missing and murdered indigenous women existed within Exitus.

7. Unlawful conduct, Utah Code 58-1-501(1)(a) and 58-31b-503 - 3rd Felony

On or about February 2023, while attending the first day of operational briefings for the NBA All Star Weekend in Salt Lake City, Utah, N.C., a victim services coordinator, overheard Candace falsely represent that she (Candace) was a nurse at the University of Utah hospital. Records obtained from University of Utah hospital revealed that Candace never worked at University of Utah health as a nurse. There is no record of Candace being licensed as a registered nurse in Utah.

8. Unlawful conduct, Utah Code 58-1-501(1)(a) and 58-31b-503 - 3rd Felony

In 2019, M.P. met Candace while consulting at Operation Underground Railroad. M.P., who founded Exitus with Candace in 2020 and served as its Chief Operating Officer, was told by Candace that she was a nurse practitioner. M.P. who works as a physician assistant and studied at the University of Utah, became suspicious of Candace after noticing discrepancies with what funds Candace said the Exitus Mountain America Credit Union account should contain and what was present in the account at the time M.P. was granted access to the account. M.P. looked for Candace's credentials on DOPL and found that she was not licensed as a nurse practitioner. M.P. eventually resigned from the board of directors at Exitus.

9. Communications fraud, \$5,000 or greater, 76-10-1801(1)(d)- 2nd Felony

On or about November 2021, Candace contacted T.S. to solicit renting his home in Lehi, Utah. Candace told T.S. misrepresented that she was a nurse practitioner and founder of Exitus. T.S. reviewed the Exitus website and saw Candace's name a photograph on the site, along with the title of nurse practitioner. T.S. agreed to rent the property to Candace. Candace later defaulted on her rental agreement, owing past rents in the amount of \$128,547.50. Without the false representations by Candace, T.S. would not have rented the home to her.

10. Communications fraud, \$5,000 or greater, 76-10-1801(1)(d)- 2nd Felony

On or about September 2020 Candace entered into a residential rental agreement with W.C. for the property he owned in Lehi, Utah. The property was managed by W.C.'s partner's 76-year-old mother C.O. Candace requested to view and rent the property on a weekend when W.C. was out of town. Candace falsely stated that she worked for the FBI and could not share information about her employment without a release from her supervisor. W.C. reasoned that such a release could not be obtained over the weekend and elected to rent the property to Candace at that time based upon her fraudulent

representations. W.C. was given a check for a rental deposit and first-month's rent. Both checks bounced when attempting deposit.

C.O, now 82 years of age, stated that she was told by Candance that Candace worked for the FBI and could not reveal the details of her work because "everything she did was secret." Over her several years as a leasing agent, C.O. recalled that this was the first time she encountered a person who did "secret work" for the government, which forbids the disclosure of Candace's purported work. C.O. stated that Candace's purported employment made her qualified to rent the home and executed a lease agreement on a weekend when W.C. was out of town.

Candace effectively "squatted" at the property for about 6 months. A 4th District Court judgement relieved the issue of Candace's squatting. And, she caused approximately \$10,000 in damage done to the property upon her eviction.

There is no record of Candace being employed by the Federal Bureau of Investigation.

11. Communications fraud, \$5,000 or greater, 76-10-1801(1)(d)- 2nd Felony

On or about February 2022, Candace asked to take part as a speaker at a conference for widows hosted at Disneyland by C.P. Candace leveraged her background as a human trafficking expert who had been featured on several well-known news outlets including the BBC, seat holder on "the UN Collaborative Taskforce," and "CEO and founder of 3 multi-million dollar companies" to secure a spot on a panel discussing grief as well as enter into a business contract between she and C.P. totaling \$8,702.55 to market C.P.'s book about the FLDS: *Devotion, Deception, Deliverance: Isaac's Story*. Candace's solicitation of this business contract included authoring the foreword for C.P.'s book, marketing the book, and sales of the book.

Candace told C.P. that she works with and has known S.B., a prominent private investigator who focuses on matters of the FLDS in the Cedar City, Utah area, "for years" and could introduce them at the Holding Out Help event. Candace assured C.P. that she obtained tickets for C.P. and three guests at a March 2023 Holding Out Help event.

On March 7, 2023, C.P. attended a fundraiser for Holding Out Help in Draper, Utah. Upon the arrival of C.P., her husband, son, and daughter-in-law, C.P. learned that not only had Candace neglected to obtain tickets for C.P., but that Candace did not know S.B..

Contact with S.T., HR Business Partner at BBC Studios- North America & Latin America revealed that no record of Candace or Exitus' appearance on their channels has ever been catalogued by the BBC.

Communication with Sylvian Roy, Senior Policy Advisor of the Conduct and Discipline Service, Administrative Law Division, Department of Management Strategy, Policy and Compliance at the United Nations revealed that Candace is not a UN staff member.

Contact with S.B. revealed that Candace attempted to call S.B. by phone after meeting him at an Attorney General Alliance summit on anti-human trafficking in Park City, Utah between January 11 and 13, 2023. Contrary to the assertions made by Candace to C.P., S.B. has not known Candace "for years" and does not work with her.

12. Communications fraud, \$5,000 or greater, 76-10-1801(1)(d)- 2nd Felony

P.O.A. has known Candace for approximately 5 years as a friend. P.O.A. began as a volunteer with Exitus in 2020 and has been an employee of Exitus and Candace's personal assistant since 2021.

On or about July 2023, P.O.A. stated that she was informed by Candace that she was denied a JP Morgan Chase Bank credit card for Exitus under Candace's own name. P.O.A. recalled this denial upsetting Candace. P.O.A. noted that she had not been paid by Exitus for several weeks during this time and was told by Candace that a credit account needed to be established in order to pay P.O.A. for her work.

On or about August 2023, Candace called P.O.A. on a three way telephone call with a JP Morgan Chase Bank representative. P.O.A. provided her personal identifying information to the JP Morgan Chase representative to establish a credit card account for Exitus in P.O.A.'s name but noted that she did not sign any documents and did not receive a card from JP Morgan Chase. P.O.A. stated her belief that in order to receive several weeks of missed paychecks, she would need to help Candace establish a credit account for Exitus. P.O.A. believes that the Exitus JP Morgan Chase credit card in P.O.A.'s name was mailed to Candace's home address.

On September 1, 2023, P.O.A. received a telephone call from JP Morgan Chase Bank's fraud department. She was informed that a total of \$19,000 had been spent on an Exitus credit card bearing P.O.A.'s name and wanted to confirm the charges. Among the charges posted to the credit account was approximately \$7,000 to purchase a vehicle at Asay Automotive, Venmo, and various cash advances. P.O.A. stated that she did not make any of these purchases but noted that Candace recently purchased a Toyota 4-Runner for her eldest son from Asay Auto and made a social media post memorializing this purchase. P.O.A. was told by JP Morgan staff that the application for a credit card account may be fraudulent itself.

Following interviews with S.W.M., P.O.A., and a review of JP Morgan Chase Bank records for Exitus, Candace appears to exert sole control over the JP Morgan Chase Exitus account.

As of September 12, 2023, P.O.A. is owed \$4,500 from 6 missed paychecks for three total weeks of unpaid work.

13. Theft by embezzlement \$5,000 or greater, 76-6-404(3)(a)(i)- 2nd felony

On August 26, 2021, Candace withdraws \$200,000 from the Exitus MACU account. A note for "wire 225,000 CB Skyshare" is attached to the withdrawal. On August 26, 2021, a wire transfer for \$225,000 is remitted from the Exitus MACU account. In total, \$425,000 was withdrawn from Exitus' MACU account on this date, with only \$225,000 used for the expressed purpose of a wire transfer to CB Skyshare.

\$200,000 remains unaccounted for.

14. Theft by embezzlement \$5,000 or greater, 76-6-404(3)(a)(i)- 2nd felony

On August 30, 2021, Candace withdraws \$150,000 from the Exitus MACU account. A note for "wire 317,493.55 CB SKYSHARE" is attached to the withdrawal. On August 30, 2021, a wire transfer for \$317,493.55 is remitted from the Exitus MACU account. In total, \$467,493.55 was withdrawn from Exitus' MACU account on this date, with only \$317,493.55 used for the expressed purpose of a wire transfer to CB Skyshare.

\$150,000 remains unaccounted for.

15. Theft by embezzlement \$5,000 or greater, 76-6-404(3)(a)(i)- 2nd felony

On December 7, 2021, Candace transfers \$55,000 from Exitus' MACU account to her own MACU account, noting "capt m Kurdistan-chase 0050." Candace makes no purchases or transfers from her MACU account consistent with the note prior to or following this deposit.

Candace's account balance prior to this transfer was \$1738.70.

On January 11, 2022, Candace withdraws \$6,600 from her MACU savings with note "A2A Transfer:****4009, Nov. pro-rate/dec/jan." Between December 7, 2021 and January 11, 2022, only two credits totaling \$168.96 are posted to Candace's MACU accounts. It should be noted that Candace moved into her home [REDACTED] at the end of November 2021 according to T.S. This transaction appears consistent with a prorated rental payment for 2.5 months.

On January 17, 2022 a check is written from Candace's MACU checking account to Truly Title for \$5,000. On January 19, 2022, \$5,000 is withdrawn from Candace's MACU savings with note "earnest money." Between January 11, 2022 and January 17, 2022, only one credit totaling \$1,150.74 is posted to Candace's MACU accounts.

The \$11,600 used as earnest money and prorated rent is documented as a loss to Exitus.

\$43,400 remains unaccounted for.

16. Theft by embezzlement \$5,000 or greater, 76-6-404(3)(a)(i)- 2nd felony

On May 2, 2022, Candace's MACU checking has a balance of \$3,403.31. On May 2, 2022, Candace transfers \$7,000 from the Exitus MACU account to her own MACU account with no notation. On May 2, 2022, Candace wires \$10,000 to Truly Title Inc. from her MACU account.

On May 7, 12, and 16, Candace receives transfers labeled "payroll" and "payroll catch up" from Exitus, totaling an additional \$7,000.

\$7,000 remains unaccounted for.

17. Theft by embezzlement \$5,000 or greater, 76-6-404(3)(a)(i)- 2nd felony

On April 28, 2022, T.S. intended to settle the sale of his home at [REDACTED] Lehi, UT to the current renter, Candace Lierd. Candace defaulted on the sale contract on this date.

On May 12, 2022 a \$240,000 international wire transfer is received from Bank of Baghdad "Life Line Logistic Company" for "utility bill payments" to Exitus JP Morgan Chase account. Two wire transfers are sent from the Exitus JP Morgan Chase account to Truly Title Inc. Trust "Attn Danielle Jarvis" totaling \$240,000.

It should be noted that T.S. was told by SourceOne financial that the company funded approximately \$700,000 for the purchase of the home on Candace's behalf to Truly Title Inc.

On May 12, 2022, T.S. was informed that Truly Title received another \$240,000 remittance via an international wire transfer, for the sale of his home to Candace, who had previously occupied the property as a renter.

On May 12, 2022, T.S. agreed to carry out the sale of his home to Candace, agreeing to a final sale price of \$938,000. T.S. received \$461,968.14 from Truly Title Inc. on this date as proceeds from the sale of the home.

Candace did not have authorization to take the \$240,000 from the Exitus account which she used to purchase the home.

18. Theft by embezzlement \$5,000 or greater, 76-6-404(3)(a)(i)- 2nd felony

On July 26, 2022, an \$8,000 cash withdrawal from Exitus' JP Morgan Chase account was conducted by Candace. On July 26, 2022, \$4,500 cash was deposited into Candace's MACU checking account. Candace's MACU checking account balance prior to this cash deposit stood at \$292.52 and had a -\$25.00 charge for "withdrawal unpaid ACH CAPITAL ONE" immediately preceding this deposit.

Two checks were also deposited to Candace's MACU checking account on July 26, 2022: \$210 from a private person and \$400 from the Church of Jesus Christ of Latter-Day Saints, noting in the memo line "2 fast offerings rent."

Following these deposits, Candace spends -\$12.23 at Beaches Tanning Center, -\$10.70 for a Google service, -\$50.00 in Apple Cash, and -\$2,174.44 to Capital One.

\$4,500 is documented as a loss to Exitus upon being inexplicably deposited to Candace's MACU account and used to make a Capital One bill payment. \$3,500 in a cash deposit remains unaccounted for. This results in an \$8,000 total loss to the Exitus JP Morgan Chase account.

19. Theft by embezzlement \$5,000 or greater, 76-6-404(3)(a)(i)- 2nd felony

At the start of July 20, 2022, Candace's balance in her MACU checking account was \$414.06. She retained \$1.00 in her MACU savings account. On July 20, 2022, a \$528.59 Venmo deposit from "Candace Rivera" was credited to Candace's account as was a \$5,000 check deposited to Candace's MACU checking account from Exitus labeled "payroll" with a check number of "157" and purportedly signed by S.W.M. Candace's MACU checking account ended July 20, 2022 with a balance of \$5,895.43.

It should be noted that in an interview with Sara S.W.M., she states to have never written or signed a check for any Exitus account. S.W.M. provided examples of her signature, two of which predate all of her purported signatures on Exitus accounts. I was able to identify the signature on the Exitus JP Morgan Chase check 157 as a forgery.

Two checks were written to C.C. on July 20, 2022 from Candace's MACU account for the purchase of a 1977 Chevrolet Corvette: a \$5,000 check (133) labeled "1st car payment (1/2)" and a \$10,000 check (134) labeled "2nd car payment (2/2)."

On July 22, 2022, check 133 for \$5,000 was cashed, leaving Candace's MACU checking account balance at \$700.20.

On August 16, 2022, check 134 for \$10,000 was returned as unpaid due to insufficient funds. On August 16, 2022, Candace's MACU checking account balance started the day at \$822.31. Check 134 for \$10,000 was processed and not paid, and Candace incurred a \$25 processing fee. Candace made several purchases throughout the day and incurred an additional overdraft fee, ending the day with a balance of -\$98.38. The balance continued to drop throughout August 17, 2022 until Candace made a check deposit of \$150, having some of the overdraft fees refunded as a courtesy by MACU. Candace ended the day with a balance of \$13.93 in her MACU checking account.

On August 18, 2022, Candace's MACU checking received a \$6,500 deposit transfer from Exitus' JP Morgan Chase account for "payroll." Also on August 18, 2022, a \$6,000 cash withdrawal was made by Candace from the Exitus JP Morgan Chase account. \$4,000 in cash was deposited into Candace's MACU checking account on this same date. Candace's MACU checking account now held \$10,513.95 after these two transactions.

On August 18, 2022, a \$10,000 cashier's check was withdrawn from Candace's MACU checking account and addressed to C.C.

On August 22, 2022, check 165 from Candace's MACU account totaling \$1,227.75 was processed by the Utah State Tax Commission for "car registration". This check was dated August 17, 2022.

Through subsequent investigation, SA Hirzel discovered that C.C. sold Candace a 1977 Chevrolet Corvette and turned the title over to Candace after clearance of the cashier's check.

At least \$4,000 is documented as a loss to Exitus, as it was used to fund the purchase of Candace's 1977 Chevrolet Corvette. \$2,000 remains unaccounted for. This equates to \$6,000 in total losses to the Exitus JP Morgan Chase account.

20. Theft by embezzlement \$5,000 or greater, 76-6-404(3)(a)(i)- 2nd felony

On November 12, 2022, Exitus held a "Casino Royale" themed gala at the Automotive Addiction Museum within the Shops at Southtowne Mall in Sandy, Utah.

On December 4, 2022, check 167 was written from the Exitus JP Morgan Chase account to Candace for "gala donation service" in the amount of \$40,000. Check 167 was deposited on December 6, 2022 to Candace's MACU checking account and a new MACU money market account in two separate \$20,000 transactions.

It should be noted that during the month of September 2022, Candace's total expenditures from her MACU account were \$8,233.72. In the month of October 2022, Candace's total expenditures from her MACU account were \$8,248.63. During the month of November 2022, the total expenditures from Candace's MACU account were \$9,063.85. The combined expenditures from Candace's personal MACU account for the two months preceding the Exitus gala and the month of the gala itself totaled just \$25,546.20.

There appeared to be no services paid through Candace's MACU account at all consistent with or totaling \$40,000 for a "gala donation service" in the months before or following the gala and \$40,000 check deposit from Exitus' JP Morgan Chase account.

\$40,000 is documented as a loss for Exitus, as \$30,000 was used to fund Candace's personal expenses during the month of December, with the remaining \$10,000 being used to fund Candace's personal expenses during January 2023.

21. Theft by embezzlement \$1,500 to \$5,000, 76-6-404(3)(b)(i)- 3rd felony

On July 13, 2022, Candace's MACU checking account balance was \$480.88. On July 13, 2022, a \$2,500 transfer was conducted by Candace from the Exitus MACU account to Candace's MACU checking account with the note "Ukraine Phase 3 contract." No transactions occurred related to travel or other Exitus business either before or after this deposit during the month of July.

\$2,500 remains unaccounted for.

22. Theft by embezzlement \$1,500 to \$5,000, 76-6-404(3)(b)(i)- 3rd felony

On July 25, 2022, the Exitus JP Morgan Chase card assigned to Candace (ending 7330) was used at "Vitalife Vitaweigh IL." According to their website, VitaLife is an Illinois based company with locations across the United States. VitaLife offers personalized fat-loss programs for customers, advertising that customers can "Lose 20-40lbs in 40 days." VitaLife sells dietary supplements, dietary food items, and make-up. In a call to VitaLife's Schaumburg, IL office, I learned that a personalized dietary plan and associated expenses can range from \$1200-2400.

\$2,200 is documented as a loss to Exitus, being used to purchase a weight loss program.

23. Theft by deception, 76-6-405(2)(a) \$500-\$1,500- A Misd

On January 17, 2023, C.P. entered into a business contract with CR House & Co. and "Candace Rivera/Lierd" for "Branding House Concierge Service" 3 month service contract which included business development, growth strategy coaching, sales funnel optimization with growth and development, full-service branding, SEO, SOS, email/SEM, and public relations for the launch and sale of her book: Devotion, Deception, Deliverance: Isaac's Story. C.P.'s husband, K.P., paid \$8,702.55 to "Candace Lierd" on February 15, 2023, for these services. C.P. understood this contract to include the sale of the book on Amazon under a sales account in which C.P. had control.

From February 15, 2023 to the date of this report, Candace asked C.P. to mail 42 copies of her book at C.P.'s own expense. Candace told C.P. that these sales were from a Shopify account which Candace retained control of. C.P. was told that Amazon rejected the sale of the novel on their platform in one instance and in another, that Amazon required a written disclosure of consent from the subject of the novel before it could be listed for sale on Amazon.

Candace also provided C.P. a number of excuses as to why C.P. couldn't have access to the Shopify account through which her book was sold, including various issues with C.P.'s PayPal account as described by Candace. C.P. states that the sale of 42 copies of Devotion, Deception, Deliverance: Isaac's Story and associated mailing costs totaled \$1,100.

To date, C.P. has not received reimbursement from Candace for any mailing expenses nor has she received payment from Candace for the sale of her books through the Shopify account under Candace's control. C.P. requested that Shopify suspend the sale of her book on the account controlled by Candace due to C.P.'s ownership of the intellectual property. Shopify has since complied. C.P.'s book is now being sold on Amazon through an account under C.P.'s control.

24. Theft of service, 76-6-409(2)(a), \$5,000 or greater- 2nd Felony

On February 17, 2023 Candace entered into a business contract for audio engineering services for podcasts with a producer of podcasts, S.W. In total, S.W. and his company produced 12 total finished episodes for Candace, along with other features- all of which were posted to a website owned by Candace: <https://crhousecompany.com/>. S.W. entered into the agreement to produce the podcasts based upon fraudulent misrepresentations by Candace regarding her background and qualifications. The services rendered by S.W. totaled \$32,900.

25. Forgery, 76-6-501(2)(b)(i)- 3rd Felony

In an interview with S.W.M., listed as the treasurer in Exitus' corporate filings and an authorized signatory on the JP Morgan Chase account alongside Candace Lierd, S.W.M. stated that she was never allowed access to the Exitus accounts by Candace, despite her position, and never signed checks on any Exitus account, used a JP Morgan Chase Bank card issued under her name on the Exitus account, or conducted other business on behalf of Exitus. S.W.M. provided a pristine JP Morgan Chase Bank card in her name, which has been retained as evidence. This investigation revealed checks written to Candace and purportedly signed by S.W.M. S.W.M. provided an exemplar of her signature as well as two forms of identification predating this investigation, both of which bare her signature.

JP Morgan Check 6076, dated 05/31/2022, addressed to Candace Lierd for "payroll-Ukraine", totaling \$5,000, endorsed by Candace displays a signature purported to be that of S.W.M. This signature does not match the exemplar samples, and S.W.M. did not ever issue a check on behalf of Exitus.

26. Forgery, 76-6-501(2)(b)(i)- 3rd Felony

In an interview with S.W.M., listed as the treasurer in Exitus' corporate filings and an authorized signatory on the JP Morgan Chase account alongside Candace Lierd, S.W.M. stated that she was never allowed access to the Exitus accounts by Candace, despite her position, and never signed checks on any Exitus account, used a JP Morgan Chase Bank card issued under her name on the Exitus account, or conducted other business on behalf of Exitus. S.W.M. provided a pristine JP Morgan Chase Bank card in her name, which has been retained as evidence. This investigation revealed checks written to Candace and purportedly signed by S.W.M. S.W.M. provided an exemplar of her signature as well as two forms of identification predating this investigation, both of which bare her signature.

JP Morgan Check 6073, dated 05/31/2022, addressed to Exitus for "payroll", totaling \$15,000, endorsed by Candace displays a signature purported to that of S.W.M. This signature does not match the exemplar samples, and S.W.M. did not ever issue a check on behalf of Exitus.

Forgery, 76-6-501(2)(b)(i)- 3rd Felony

In an interview with S.W.M., listed as the treasurer in Exitus' corporate filings and an authorized signatory on the JP Morgan Chase account alongside Candace Lierd, S.W.M. stated that she was never allowed access to the Exitus accounts by Candace, despite her position, and never signed checks on any Exitus account, used a JP Morgan Chase Bank card issued under her name on the Exitus account, or conducted other business on behalf of Exitus. S.W.M. provided a pristine JP Morgan Chase Bank card in her name, which has been retained as evidence. This investigation revealed checks written to Candace and purportedly signed by S.W.M. S.W.M. provided an exemplar of her signature as well as two forms of identification predating this investigation, both of which bear her signature.

JP Morgan Check 6074, dated 05/31/2022, addressed to Candace Lierd for "Ukraine operation", totaling \$7,500, endorsed by Candace displays a signature purported to be that of S.W.M. This signature does not match the exemplar samples, and S.W.M. did not ever issue a check on behalf of Exitus.

27. Forgery, 76-6-501(2)(b)(i)- 3rd Felony

In an interview with S.W.M., listed as the treasurer in Exitus' corporate filings and an authorized signatory on the JP Morgan Chase account alongside Candace Lierd, S.W.M. stated that she was never allowed access to the Exitus accounts by Candace, despite her position, and never signed checks on any Exitus account, used a JP Morgan Chase Bank card issued under her name on the Exitus account, or conducted other business on behalf of Exitus. S.W.M. provided a pristine JP Morgan Chase Bank card in her name, which has been retained as evidence. This investigation revealed checks written to Candace and purportedly signed by S.W.M.. S.W.M. provided an exemplar of her signature as well as two forms of identification predating this investigation, both of which bare her signature.

JP Morgan Check 155, dated 06/15/2022, addressed to Candace Lierd for "payroll catch up", totaling \$5,000, endorsed by Candace displays a signature purported to be S.W.M.'s. This signature does not match the exemplar samples, and S.W.M. did not ever issue a check on behalf of Exitus.

28. Forgery, 76-6-501(2)(b)(i)- 3rd Felony

In an interview with S.W.M., listed as the treasurer in Exitus' corporate filings and an authorized signatory on the JP Morgan Chase account alongside Candace Lierd, S.W.M. stated that she was never allowed access to the Exitus accounts by Candace, despite her position, and never signed checks on any Exitus account, used a JP Morgan Chase Bank card issued under her name on the Exitus account, or conducted other business on behalf of Exitus. S.W.M. provided a pristine JP Morgan Chase Bank card in

her name, which has been retained as evidence. This investigation revealed checks written to Candace and purportedly signed by S.W.M. S.W.M. provided an exemplar of her signature as well as two forms of identification predating this investigation, both of which bear her signature.

JP Morgan Check 157, dated 07/15/2022, addressed to Candace Lierd for "payroll", totaling \$5,000, endorsed by Candace displays a signature purported to be S.W.M.'s. This signature does not match the exemplar samples, and S.W.M. did not ever issue a check on behalf of Exitus.

29. Forgery, 76-6-501(2)(b)(i)- 3rd Felony

In an interview with S.W.M., listed as the treasurer in Exitus' corporate filings and an authorized signatory on the JP Morgan Chase account alongside Candace Lierd, S.W.M. stated that she was never allowed access to the Exitus accounts by Candace, despite her position, and never signed checks on any Exitus account, used a JP Morgan Chase Bank card issued under her name on the Exitus account, or conducted other business on behalf of Exitus. S.W.M. provided a pristine JP Morgan Chase Bank card in her name, which has been retained as evidence. This investigation revealed checks written to Candace and purportedly signed by S.W.M. S.W.M. provided an exemplar of her signature as well as two forms of identification predating this investigation, both of which bear her signature.

JP Morgan Check 165, dated 11/10/2022, addressed to CommonCents Casino for "gala casino deposit", totaling \$2,055 displays a signature purported to be S.W.M.'s. This signature does not match the exemplar samples, and S.W.M. did not ever issue a check on behalf of Exitus.

30. Unlawful conduct, Utah Code 58-1-501(1)(a) and 58-31b-503 - 3rd Felony

On or about July 9, 2020, Candace sent a photograph of a Mountainstar St. Mark's hospital ID card with the name "Candace" and a photograph depicting Candace to the W. family. A heart shaped sticker covered the area which would have listed the position held at the hospital. Candace purported this photograph to be proof of her registered nurse status to the W. Family. This photograph was provided to Global Adoption Services as proof of Candace's qualification to conduct a medical transport of a child from Europe to the United States.

Findings in this investigation revealed that in a resume dated 04-16-2015 provided by Candace to Intermountain Health as a part of her application for employment as a registered nurse, she disclosed being employed by "Parallon/Mountain Star" from "03/2013-Current" in the capacity of a "Health Care Tech." Records obtained from Utah Workforce Service confirm Candaces employment at Parallon Enterprises, LLC in 2013, 2014, 2015, and 2016.

Candace's falsely asserted to the W. family that she was a registered nurse, which she has never been.

31. False or inconsistent statements, 76-8-503(1)(a)(i)- Misd B

On January 8, 2022, Candace filed a theft from vehicle report with Draper PDDR 2022-424). In that report and subsequent review of body-worn camera footage, Candace reports having a "US Passport Card with 'SF Department of Defense Clearance'."

As of July 25, 2023, the Department of State Office of Personnel Security & Suitability, which handles all requests for security clearance, has no record of Candace ever applying for or being granted a security clearance by the United States government.

32. False or inconsistent statements, 76-8-503(1)(a)(i)- Misd B

On January 8, 2022, during her report to Draper PD officers, Draper PD related to her theft from vehicle report, Candace reports having "ballistic rated glass" on her vehicle because of the positions she holds, which is shattered in the theft, and valued at \$1,500 per window.

A review of Draper PD body-worn camera footage documenting the crime scene shows no indication that Candace's vehicle windows are "ballistic rated." The windows appeared to have been comprised of normal tempered auto glass with a dark tint laminate on the rear windows, of a width consistent with all other auto glass, one of which was shattered by an unknown impact device consistent with a tool of the trade for those who commit this type of crime. Shattered glass from an impact device used in thefts from vehicles does not comport with my observation of ballistic glass.

33. Identity Fraud, 76-6-1102(3)(b)(i), \$5,000 or greater- 2nd Felony

On or about August 2023, Candace called P.O.A. on a three way telephone call with a JP Morgan Chase Bank representative. P.O.A. provided her personal identifying information to the JP Morgan Chase representative to establish a credit card account for Exitus in P.O.A.'s name but noted that she did not sign any documents and did not receive a card from JP Morgan Chase. P.O.A. stated her belief that to receive several weeks of missed paychecks, she would need to help Candace establish a credit account for Exitus. P.O.A. believes that the Exitus JP Morgan Chase credit card in P.O.A.'s name was mailed to Candace's home address.

On September 1, 2023, P.O.A. received a telephone call from JP Morgan Chase Bank's fraud department. She was informed that a total of \$19,000 had been spent on an Exitus credit card bearing P.O.A.'s name and wanted to confirm the charges. Among the charges posted to the credit account was approximately \$7,000 to purchase a vehicle at Asay Automotive, Venmo, and various cash advances. P.O.A. stated that she did not make any of these purchases but noted that Candace recently purchased a Toyota 4-Runner for her eldest son from Asay Auto and made a social media post memorializing this purchase. P.O.A. was told by JP Morgan staff that the application for a credit card account may be fraudulent itself.

Following interviews with S.W.M., P.O.A., and a review of JP Morgan Chase Bank records for Exitus, Candace appears to exert sole control over the JP Morgan Chase Exitus account.

In a social media post made to Candace's "ONE_FIERCE_MAMA" Instagram account on August 12, 2023, she posts a video apparently gifting a gray Toyota 4-Runner to her oldest son. The caption reads "...Our friends at @asayauto are the best!"

34. Identity Fraud, 76-6-1102(3)(a), less than \$5,000- 3rd Felony

On or about July 9, 2020 Candace sent a screen capture photograph of a Utah Department of Professional Licensing (DOPL) web page depicting the registered nursing license of C.C.L., a resident of Taylorsville, UT, with an active DOPL license number of 500524-3102 to the W. family. This photo was sent to Global Adoption Services, who provided them to Studinger.

As observed through emails from Global Adoption Services, the W. family intended to adopt a medically needy child from Europe and needed to hire a registered nurse to attend to the child during transport. Candace told the family that her registered nursing license is under her prior name of "C.L." Candace could not provide the agency, family, or embassy with proof of her prior name.

According to a North Carolina registered nurse who has conducted these transports in the past, nurses often volunteer their time on these transports and do not receive payment. However, in 2022, Studinger stated that Candace secured a \$1,000 payment for Exitus from Open Hearts for Orphans to help fund a registered nurse for a separate adoption transport for a medically needy child from Europe to the United

States. This transport never occurred, and the funds were not refunded. Funds from Open Hearts for Orphans represent a portion of the dollar value of a registered nurse's time during such a transport.

Findings in this investigation revealed no evidence that Candace used the "C.L." name prior to this communication. The subject whom Candace purported to be to the W. family has been identified as C.C.L. DOB [REDACTED] of Taylorsville, UT from DOPL records.

Statement on flight risk

Records from the United States government, as well as an assessment of publicly viewable social media content, bank records, and interviews with persons affiliated with Candace and Exitus reveal that Candace Lierd regularly travels internationally; to Mexico, Afghanistan, Romania, Dubai, Ukraine, Amsterdam, Moldova, Lebanon, and elsewhere. These trips appear to be for both business and leisure purposes.

In an interview with P.O.A.- Candace's personal assistant and secretary to Exitus, P.O.A. noticed that Candace's date of birth on her driver's license differs from her date of birth on Candace's US passport. P.O.A. is also aware of a home Candace reports to own in Lebanon.

Additionally, on or about February 29, 2020, Candace filed a report with the Lehi police department in which she reported having her passport stolen from her home. On January 8, 2022, Candace reported to the Draper police department that her Cadillac Escalade had been broken in to and her passport and other items had been stolen.

In her interview, S. was advised by Candace of her ability to obtain fraudulent passports for herself and others in different countries due to her international connections.

In an interview with P.L., ex-spouse of Candace, P.L. recalled an instance where Candace altered a check for a truck payment made from his bank account during their marriage. P.L. was contacted by the Mountain America Credit Union fraud department informing him of the discrepancy. Candace later admitted to altering the check and spent the funds intended for the payment.

In an interview with K.M., Chief Operating Officer of CR House & Co. and friend to Candace, Morgan recalled a time when Candace asked K.M. how to alter bank records using Adobe Photoshop. In another event, Candace asked K.M. to alter a Wells Fargo bank deposit slip for a missed mortgage payment to her lender. K.M. refused.

Based upon the foregoing, it is the belief of the case agent that Candace has altered her US passport or documents supporting her identity to obtain a US passport, may have retained a passport previously reported stolen to law enforcement, and has demonstrated a willingness and ability to manufacture or obtain fraudulent documents.