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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 3:22-cr-00026-JMK-MMS
)	
Plaintiff,)	
)	
vs.)	
)	
GLENN E. LOCKWOOD AND)	
SARAY CONSUELO SARMIENTO)	
ANGARITA LOCKWOOD,)	
)	
Defendants.)	
_____)	

**UNITED STATES' MOTION FOR DETENTION HEARING
AND DETENTION PENDING TRIAL**

The United States of America, by and through its counsel Michael Heyman,
Assistant United States Attorney, and Ahmed Almudallal, Trial Attorney, U.S.

Department of Justice, hereby respectfully moves: (1) for a hearing to determine whether defendant Glenn E. Lockwood (“Lockwood”) should be detained pending trial, and (2) an order detaining Lockwood pending trial.

I. INTRODUCTION

Lockwood is a career tax offender. He was convicted of tax evasion in the District of Alaska in 2007 and served 5-years in prison for conduct including the concealment of assets through sham trusts and offshore entities in Ireland, the Cayman Islands and Bahamas. He is now charged with 84 new criminal violations, including committing tax evasion as soon as he was released from his last prison sentence and while on supervised release, as well as new forms of criminal activities such as bankruptcy fraud, wire fraud, money laundering, and related conspiracies.

Lockwood is a serious risk of flight and there is a serious risk that he will attempt to obstruct justice unless detained. A detention hearing should be held and he should be detained pending trial. Among other things, the overwhelming weight of the evidence acquired through the multi-year investigation, Lockwood’s 20+ year history of dishonesty and deceit, his significant international ties, access to substantial known and hidden assets, and because his wife/co-Defendant Saray Lockwood and minor child are in Colombia (and have been since October 2021), there is a serious risk he will flee pursuant to 18 U.S.C. § 3142(f)(2)(A) and a serious risk he will attempt to obstruct justice pursuant to 18 U.S.C. § 3142(f)(2)(B). Moreover, there is no combination of conditions that will reasonably assure his appearance at trial pursuant to 18 U.S.C. § 3142(e)(1). Accordingly, the United States respectfully moves this Court for an order setting a

hearing to determine whether Lockwood should be detained and an order detaining him pending trial.

II. BACKGROUND

Lockwood, with his wife/co-defendant Saray Lockwood, jointly own the Kenai Dental Clinic in Kenai, Alaska (the “Clinic”). Saray Lockwood also worked at the Clinic.

In September 2007, Lockwood was charged with tax evasion in violation of 26 U.S.C. § 7201 for tax years 2000, 2001, 2002, and 2003, *United States v. Lockwood*, case number 3:07cr115, United States District Court, District of Alaska.

In October 2008, a jury found Lockwood guilty of four counts of tax evasion. Lockwood was sentenced to serve 60 months in prison followed by three years of supervised release. Ex. 1.

Upon his release to home confinement in April 2013, Lockwood commenced a new scheme to avoid his federal income tax obligations by forming a Wyoming company that would later be used as a nominee to conceal assets – Strategic Innovations LLC (“Strategic Innovations”). In July/August 2015, the IRS notified the Lockwoods that four of their real estate properties had been seized and would be auctioned off on October 8, 2015. Ultimately, the Lockwoods were able to purchase three of the seized properties using Strategic Innovations. *See, e.g.*, Dkt. 2, ¶¶ 6 and 10.

In April 2019, the Lockwoods filed a bankruptcy petition under Title 11 of the United States Code, *In re Glenn E. Lockwood and Saray C. Lockwood*, case number 19-00102, United States Bankruptcy Court, District of Alaska. Bankruptcy attorney Terry

Draeger represented them in the bankruptcy case. During the course of the bankruptcy, the Lockwoods made numerous false statements about their assets including, among others, their control and ownership of Strategic Innovations. *Id.* at ¶ 22.

On June 1, 2021, the U.S. Trustee filed an adversary proceeding seeking to deny the Lockwoods' bankruptcy discharge, *United States Trustee v. Glenn and Saray Lockwood*, Adversary Case Number 19-00102, United States Bankruptcy Court, District of Alaska. The complaint alleged: (1) concealment and transfer of assets, (2) inadequate records, (3) false oaths, and (4) failure to account for loss of assets. Ex. 2.

The bankruptcy case was ultimately dismissed *with prejudice*. See Dkt. 2, ¶¶ 38-44.

On April 20, 2022, a federal grand jury returned an 84-count indictment charging Defendants with: evasion of payment of federal income taxes in violation of 26 U.S.C. § 7201; conspiracy to defraud the United States in violation of 18 U.S.C. § 371; bankruptcy fraud in violation of 18 U.S.C. § 157; concealment of bankruptcy assets in violation of 18 U.S.C. § 152(1); false oath in bankruptcy in violation of 18 U.S.C. § 152(2); false bankruptcy declaration in violation of 18 U.S.C. § 152(3); fraudulent proof of claim in bankruptcy in violation of 18 U.S.C. § 152(4); conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349; wire fraud in violation of 18 U.S.C. § 1343; conspiracy to commit money laundering in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and (h); and money laundering in violation of 18 U.S.C. § 1956(a)(1)(B)(i). Dkt. 2.

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III. LEGAL STANDARD

Pursuant to 18 U.S.C. §§ 3142(f)(2)(A) and (B), the judicial officer shall hold a hearing on the question of detention upon the motion of the government in a case that involves “(A) a serious risk that such person will flee; or (B) a serious risk that such person will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness or juror.”

The Bail Reform Act permits a judicial officer to hold an individual without bond pending trial if the officer finds clear and convincing evidence that “no condition or combination of conditions will reasonably assure the appearance of the person as required...” 18 U.S.C. § 3142(e). In considering whether detention is appropriate, the Court must consider the following factors: (1) the nature and circumstances of the offense charged; (2) the weight of the evidence against the defendant; (3) the history and characteristics of the defendant, including his “character, physical and mental condition, family ties, employment, financial resources, length of residence in the community, community ties, past conduct, history relating to drug or alcohol abuse, criminal history, and record concerning appearance at court proceedings” and “whether, at the time of the current offense or arrest, the person was on probation, on parole, or on other release pending trial, sentencing, appeal, or completion of sentence for an offense under Federal, State, or local law;” and (4) the nature and seriousness of the danger to any person or the community that would be posed by the defendant’s release. *See* 18 U.S.C. § 3142(g).

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IV. ARGUMENT

A. A Detention Hearing is Warranted Pursuant to 18 U.S.C. §§ 3142(f)(2)(A) and (B)

A detention hearing is warranted because Lockwood is a serious risk of flight and because there is a serious risk that he will attempt to obstruct justice.

1. Serious Risk of Flight

Lockwood is a serious risk of flight for several reasons:

First, Lockwood has already been convicted of tax evasion and served five years in federal prison, followed by three years of supervised release. Ex. 1. He is now charged with new criminal conduct with *significantly* higher sentencing exposure. If convicted, Lockwood is facing a conservative sentencing guidelines sentencing range of between 135 and 168 months (11 ¼ - 14 years). The actual range could be even higher. Given this sentencing exposure, the risk of flight – especially given the strength of the evidence described below and his age (75) – is great.

Second, Lockwood has extensive foreign familial connections. Saray Lockwood is originally from Colombia, has close family in Colombia, is currently in Colombia, and has been in Colombia since October 2021 with their minor daughter. Lockwood has traveled to Colombia on multiple occasions, including as recently as December 2021, and Saray Lockwood has sent wire transfers to family in Colombia.¹ In addition, Saray

¹ Records further indicate recent travel to Iceland, the Dominican Republic, and Austria.

Lockwood owns real estate in Colombia, property that was initially concealed in their bankruptcy filing. Ex. 3 (Interrogatory Response Nos. 22-23).

Third, Lockwood has significant financial resources, some known and others hidden. As alleged in the Indictment, Lockwood operates the Clinic with gross receipts of \$1 - \$2 million per year. Both Glenn and Saray Lockwood receive large salaries from the Clinic and, in addition to their base salaries, receive bonuses ranging from \$22,000 to \$70,000 per year. In 2018, they collectively received compensation from the Clinic totaling \$598,562.00. As of the date of their bankruptcy in April 2019, the Lockwoods' total gross monthly income was \$36,258.00 and their *net monthly income was \$18,071.00*, resulting in at least approximately \$216,852.00 in annual net income. Within a short period of time before and after filing bankruptcy, they were also vacationing in Las Vegas, Waikiki, and Salt Lake City (and attending a Lakers vs. Jazz basketball game), hunting for buried WWII treasure in the Philippines, and otherwise maintaining their lifestyle while directing the Clinic to pay for tens of thousands of dollars in personal lawyers' fees. While the pandemic impacted revenue somewhat, insurance payment records indicate that the Clinic continues to generate strong revenue. *See, e.g.*, Dkt. 2, ¶¶ 5, and 30-33.

Lockwood also has significant unknown cash and resources. He was convicted of utilizing sham trusts and offshore accounts in his first criminal trial, but his concealment is also recent. Lockwood concealed several assets in his bankruptcy case, including cash, social security benefits, and an interest in a treasure hunting venture in the Philippines, to name a few. *See, e.g.*, Dkt. 2, ¶¶ 24-45. In addition, Lockwood has large stashes of cash,

including, at times, tens of thousands of dollars stored in a safe at the Clinic that is accessed as needed. For instance, in the bankruptcy, the Lockwoods admitted having least \$60,000 in cash that they deposited into the Clinic’s FNBA Account -4481 on March 26, 2019, about a week before the bankruptcy, but claimed that the cash belonged to the Clinic (which they use to pay personal expenses). *See* Ex. 3 (Interrogatory Response No. 26).

The Lockwoods have also engaged in a variety of gamesmanship to conceal cash, such as writing themselves checks before the bankruptcy on April 2, 2019, but not cashing them until after the bankruptcy. Examples are:

Paid From	Date Written	Date Paid	Payor	Payee	Amount
Clinic FNBA -4481	11/4/18	4/15/19	Clinic	Glenn Lockwood	\$4,500.00
Clinic FNBA -4481	12/4/18	4/15/19	Clinic	Glenn Lockwood	\$4,500.00
Clinic FNBA -4881	12/31/18	4/12/19	Clinic	Glenn Lockwood	\$9,000.00
Clinic FNBA -4481	12/31/18	4/17/19	Clinic	Saray Lockwood	\$9,000.00
Clinic FNBA -4481	“12/31/18 11/30/19”	12/5/19	Clinic	Saray Lockwood	\$29,000.00
Clinic FNBA -4481	“12/31/18 11/30/19”	12/5/19	Clinic	Glenn Lockwood	\$29,000.00

Presently, Lockwood is in the process of remodeling much of his home, including what appeared to be custom kitchen cabinets.

Fourth, Lockwood has additional connections in the Philippines. According to Western Union records, Lockwood has been wiring funds to an individual named Deo

Ramos in the Philippines regularly for several years. Ex. 4.² These wire transfers – including four separate transfers just before and just after the bankruptcy filing – and the treasure hunting venture were also concealed from the bankruptcy. These transfers continued at least through late 2021. *Id.*

2. *Serious Risk of Attempted Obstruction of Justice*

There is a serious risk that Lockwood will attempt to obstruct justice.

First, Lockwood has already deceived the U.S. Probation Department in connection with his supervised release and recently deceived multiple bankruptcy officials.

As a condition of supervised release following his term of incarceration for his original tax evasion case, Lockwood was ordered as follows:

1. The defendant shall cooperate with the reasonable requests of Internal Revenue officers in a good faith, best efforts attempt to pay in full any outstanding tax liability, including penalty and interest, or enter into an installment payment plan with the Collection Division of the Internal Revenue Service (IRS) within sixty (60) days from the final assessment (First Notice and Demand).
2. The defendant shall provide to the U.S. Probation Office a copy of any written and approved agreement with the IRS for the payment of any outstanding tax liability, within ten (10) days from the execution of such agreement. If the defendant enters into any such agreement, he shall make timely payments and shall abide by the terms of such agreement during his term of supervised release.

Ex. 1.

² The exhibit containing Western Union data has been modified to exclude irrelevant data and personal information such as credit card numbers, birthdates, etc.

Lockwood failed in every way to comply, but convinced the U.S. Probation Office that he was in full compliance with these conditions. For example, Lockwood submitted to Probation documentation of an installment agreement with the IRS. However, the installment agreement he submitted was not his own. Sealed Ex. 1. It was for the Clinic's deficient tax liability and not the personal tax liability for which he was convicted and ordered to pay. *Id.*

Before changing its name to the Kenai Dental Clinic, the Lockwoods operated "Glenn E. Lockwood DDS PC." The tax-related documentation submitted to Probation was for Glenn E. Lockwood DDS PC -- not Glenn E. Lockwood personally. The discrepancy was subtle, but significant. Lockwood had no agreement with the IRS and was, to the contrary, again actively evading those taxes. He successfully deceived Probation into believing all conditions had been met, including a settlement and payment plan with the IRS when, in fact, no paperwork was presented regarding his personal tax liability and he was in the process of evading those taxes.

In addition, Lockwood has also deceived officials in his bankruptcy case, including Kenneth Battley, his Chapter 7 Trustee, and the Office of the United States Trustee. The deceit included multiple written false statements under penalty of perjury and several false statements during sworn testimony. *See, e.g.,* Dkt. 2, ¶¶ 17-79.

Second, Lockwood has fabricated documents, including corporate records submitted in connection with his bankruptcy proceeding. For instance, testimony will establish that the information contained in the attached corporate minutes is fiction. *See* Ex. 5. Additional examples exist as well, some of which contain statements that are

factually impossible.

Third, Lockwood took actions during the grand jury investigation with respect to his bankruptcy attorney Terry Draeger that may have influenced the grand jury process. Additional details will be provided as the Court deems appropriate and necessary.

Fourth, the United States intends to call at trial both current and former employees of the Clinic. Lockwood, as the Clinic's owner, is the direct employer and supervisor of one current Clinic employee who has provided information about the falsity of corporate records and information pertaining to concealed assets. Even if Lockwood is ordered not to discuss the case with the witness, the pressures and potential negative consequences given the supervisor / subordinate relationship are great, and will necessarily impact the witness's testimony, particularly since the Clinic has only a few employees.

Based on the foregoing, Lockwood is a serious risk of flight and there is a serious risk he will attempt to obstruct justice.

B. Lockwood Should be Detained Pending Trial

While there are a limited number of facts that weigh in favor of Lockwood's release, the balance of factors on the whole establish that detention is warranted and that no combination of circumstances will ensure his appearances.

1. Nature and Circumstances of the Offense

The nature and circumstances of the offenses warrant detention. Lockwood is a career tax offender that has already been convicted of tax evasion and served 5 years in custody. He is now charged with 84 counts of tax evasion, bankruptcy fraud, wire fraud, money laundering and related conspiracies. These criminal acts include extensive

dishonesty, deceit, and untrustworthiness spanning over two decades. A brief overview of the nature and circumstances of the new offenses is as follows:

As referenced, in October 2008, an Anchorage jury found Lockwood guilty of evading the assessment of over \$575,000 in federal income taxes for years 2000-2003 through the use of offshore entities, nominees, and sham trusts. Lockwood was sentenced to 60 months in prison and remained in custody until April 2013, when he was placed on home confinement for approximately four additional months. Upon his release from prison and while on home confinement, Lockwood, undeterred, immediately returned to his criminal conduct, including evading payment of the federal income taxes that he had just been convicted of evading.

Although the IRS was attempting to collect the unpaid taxes with levies, seizures, and auctions, the Lockwoods obstructed and impeded those collection efforts by creating a shell company named Strategic Innovations LLC (“Strategic Innovations”) in the State of Wyoming to surreptitiously re-purchase properties seized from them and sold at auction. Lockwood created Strategic Innovations while on home confinement.

Documents obtained from LegalZoom and the State of Wyoming show that Lockwood formed Strategic Innovations in May 2013, just weeks after his release from federal prison. Bank records from Wells Fargo Bank also show that the Lockwoods opened business checking and savings accounts in the name of Strategic Innovations on October 6, 2015, two days before the IRS auction of their four seized properties. The opening deposits of nearly \$160,000 used to capitalize the two accounts came exclusively from checks drawn on Lockwood’s retirement and investment accounts at Janus Henderson

and Columbia Investments, as explained more fully below. Bank records also prove that the Lockwoods transferred hundreds of thousands of dollars in and out of Strategic Innovations, including at least 23 structured transactions in an effort to avoid bank reporting requirements. They further transferred funds among various other accounts and entities in a web of deliberately incomprehensible transactions.

Shortly after receiving notice that the IRS and the Department of Justice had commenced an action to seize their primary residence in early 2019, with no other tactical options, the Lockwoods filed for Chapter 11 bankruptcy protection on April 2, 2019, to thwart the IRS's efforts.

As explained in the Indictment, the bankruptcy, however, was not intended as a good faith reorganization, but a last-ditch attempt to evade paying taxes. Instead, the Lockwoods used the process in furtherance of their tax scheme and committed a number of additional offenses, with several new victims. They not only concealed assets and provided intentionally misleading information in their bankruptcy petition, but continued the lies throughout the multi-year bankruptcy case, including in written discovery and during sworn testimony. The Indictment outlines several – but not all – of those lies. *See, e.g.*, Dkt. 2, ¶¶ 17-79.

2. Weight of the Evidence

While the weight of the evidence is the least important factor, the weight of evidence against the defendant is overwhelming. Bank records, financial institution records, public records, bankruptcy court filings, multiple witnesses, audio recordings, and other documentary evidence collected over the course of this multi-year investigation

firmly establish that Lockwood committed the charged offenses.

In one example, on October 13, 2020, Lockwood testified under penalty of perjury that he borrowed money from friends and family to fund Strategic Innovations and purchase real estate that had been previously seized from him and was being sold at an IRS auction. He testified this way to convince the Trustee that he had no interest in Strategic Innovations.

13 MR. LeROY: Did you provide the money to Strategic
14 Innovations to buy these three properties from the IRS?

15 MR. LOCKWOOD: Yes, sir. But not in 20 --

16 MR. LeROY: Where did this money come from?

17 MR. LOCKWOOD: I had to borrow --

18 MR. LeROY: Did it come from you? Okay. Go
19 ahead. I'm sorry to interrupt.

20 MR. LOCKWOOD: I borrowed money from family and
21 friends.

22 MR. LeROY: Okay. So all of these three
23 properties were bought by Strategic Innovations with money
24 that you borrowed and provided Strategic Innovations?

25 MR. LOCKWOOD: Yes, sir.

Ex. 6 at 46.

As a follow-up, the Lockwoods were then asked in an interrogatory to explain this testimony. The question and response are below:

4. At both the September 16, 2020 and the October 13, 2020 Creditors' Meetings Glenn Lockwood testified that You loaned Strategic Innovations, LLC the funds it used to purchase the real property it currently owns. Please identify the person or entity you borrowed the funds from prior to transferring them to Strategic Innovations, LLC to fund the purchases. If You chose to invoke the Fifth Amendment, please note that in Your response.

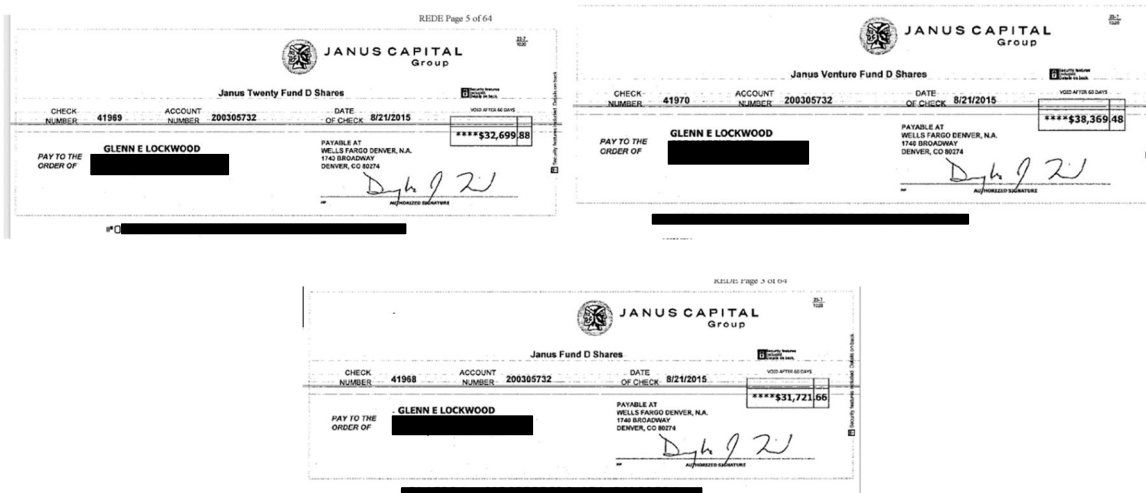
RESPONSE NO. 4: Eva Angarita (Saray's mother) \$30,000, Luis Sarmiento (Saray's brother) \$25,000, and Jess T. Ellis (Saray's brother) \$10,000 provided the funds paid to Richard Happel.

Ex. 7 (Interrogatory Response No. 4).

This testimony and interrogatory response are false. Financial institution and bank records establish that Lockwood opened the two Strategic Invocations bank accounts at Wells Fargo Bank and directly funded the accounts with his personal investment and retirement funds. The funds did not come from friends and family. Indeed, in a recorded phone call from August 21, 2015, Lockwood is heard requesting liquidation of his investment account at Columbia Threadneedle. Immediately thereafter, Columbia Threadneedle liquidated the account and sent Lockwood a check in the amount of \$40,113.95. Lockwood then directly deposited the check from Columbia Threadneedle into the newly-opened Strategic Innovations savings account.



The same is true for the Janus funds – Lockwood received three checks and deposited them directly into Strategic Innovations.



The paper trail is explicit. Friends and family did not loan Lockwood the funds deposited into Strategic Innovations; the funds came directly from Lockwood's retirement and investment accounts.

The weight of the evidence overwhelming.

3. *Lockwood's History and Characteristics*

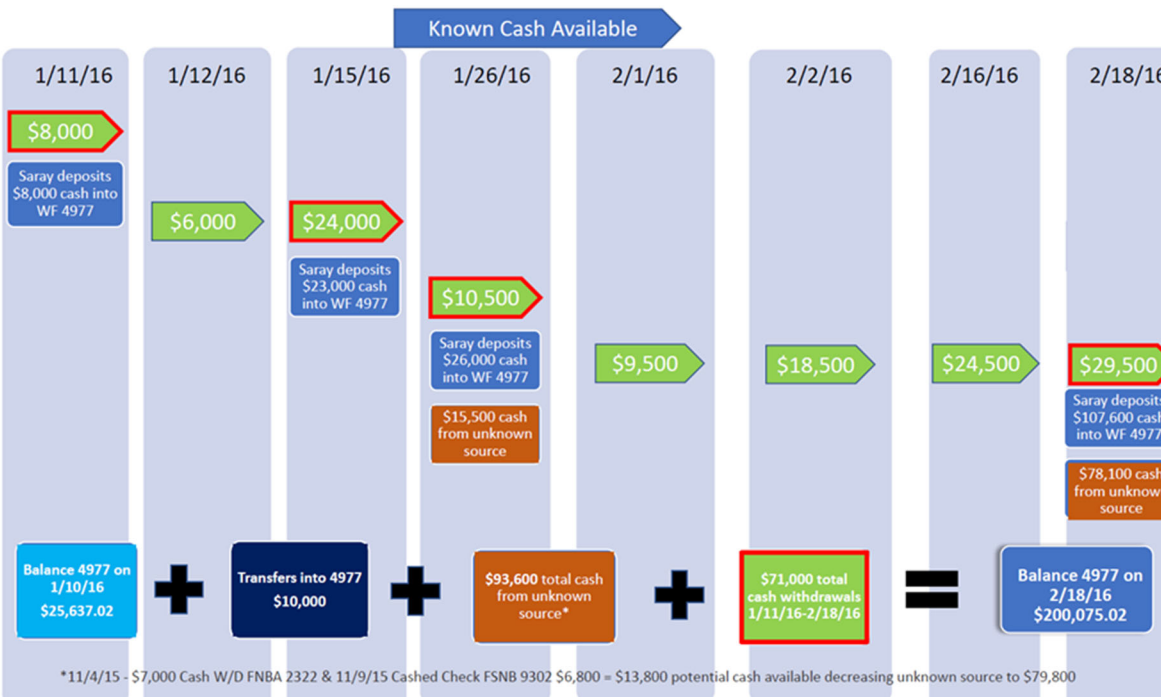
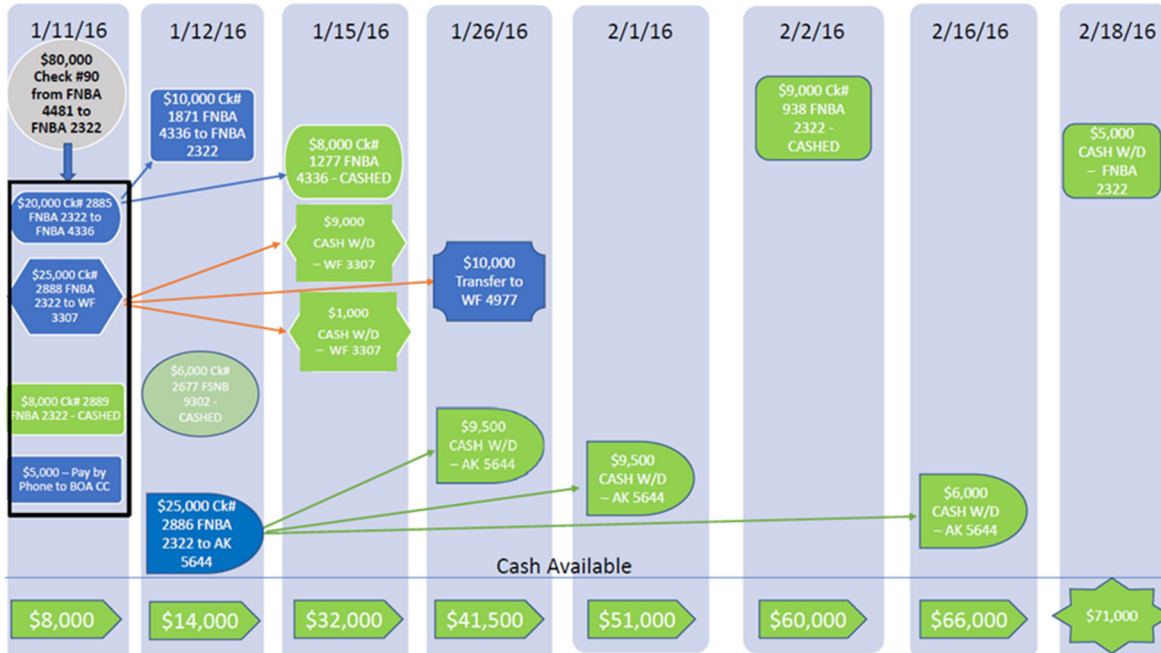
Although Lockwood is a 75-year old Army veteran with ties to the Kenai area through his dental clinic, the countervailing considerations weigh heavily in favor of detention.

- Lockwood has a History of Dishonesty to Probation and Bankruptcy Officials

See Section IV(A)(2) above.

- Lockwood has an Extended History of Sophisticated Deceit

Lockwood has an extended history of engaging in sophisticated financial transactions to cloud the nature of the transactions and his financial condition. This includes unlawful structuring and creating an inexplicable web of financial transactions to fund Strategic Innovations. For example, in 2016, the Lockwoods deposited \$164,000 into Strategic Innovations through a series of transactions using numerous accounts and cash deposits. They could have accomplished their goal of funding Strategic Innovations with a single check or direct wire transfer, but attempted to conceal the source of the funds and their ownership of Strategic Innovations by moving money between accounts over an approximate one-month period, including pulling out cash, and redepositing it into Strategic Innovations. The charts below highlight these transactions. While confusing, the Lockwoods withdrew \$80,000 from a Clinic account, converted it to cash, and deposited that cash into Strategic Innovations. In addition, they deposited an additional \$93,000 in cash obtained from an *unknown* source:



In total, the Lockwoods deposited \$164,600 in cash into Strategic Innovations in a five-week period.

About two weeks later, the Lockwoods then structured nearly all of the money out of the Strategic Innovations account. The chart below shows the structured transactions:

Date	Individual	Cash Withdrawal Amount	Branch Location
2/23/2016	Saray Lockwood	\$9,500.00	Kenai
2/25/2016	Saray Lockwood	\$9,500.00	Kenai
2/29/2016	Saray Lockwood	\$9,500.00	Soldotna
3/02/2016	Saray Lockwood	\$9,500.00	Soldotna
3/07/2016	Saray Lockwood	\$9,500.00	Kenai
3/07/2016	Glenn Lockwood	\$9,100.00	Soldotna
3/07/2016	Glenn Lockwood	\$9,000.00	Kenai
3/07/2016	Glenn Lockwood	\$5,000 (Saray check to Dr. Lockwood)	
3/07/2016	Glenn Lockwood	\$9,500 (Saray check to Dr. Lockwood)	
3/08/2016	Saray Lockwood	\$9,500.00	Kenai
3/09/2016	Saray Lockwood	\$9,500.00	Kenai
3/09/2016	Saray Lockwood	\$9,000 (Saray check to Saray for cash)	
3/10/2016	Glenn Lockwood	\$9,000.00	Kenai
3/11/2016	Saray Lockwood	\$9,500.00	Kenai
3/11/2016	Glenn Lockwood	\$9,500.00	Soldotna
3/17/2016	Glenn Lockwood	\$9,500.00	Henderson, NV
3/21/2016	Glenn Lockwood	\$9,500.00	Soldotna
3/25/2016	Glenn Lockwood	\$9,500.00	Anchorage
4/01/2016	Saray Lockwood	\$9,500.00	TBD
4/18/2016	Saray Lockwood	\$5,300.00	TBD
Grand Total:		\$179,400.00	

Moreover, the Lockwoods were aware that structuring was unlawful. The Lockwoods had previously engaged in structuring and were issued an official warning letter on the subject. Even after having been officially warned about the nature and illegality of structuring, the Lockwoods withdrew approximately \$180,000 from Strategic Innovations in structured transactions. *See* Dkt. 2, ¶ 10(f)-(g).

- Lockwood Has a History of Utilizing Shell Entities to Defraud

In his first criminal case, Lockwood was convicted of utilizing sham trusts and shell entities, including offshore entities in Ireland, the Cayman Islands and Bahamas.³

Upon his release from prison in 2013, he immediately did it again. He formed Strategic Innovations and utilized the entity in the manner described above and in the

³ One trust was the TwoDoc Ultra Trust, a trust that has remained active and held title to one of Lockwood's properties through at least January 2021. *See* Ex. 8. Documents from the original trial showing the use of the offshore entities are voluminous, but available upon request.

Indictment.

- Lockwood has Significant Financial Resources, Some Known, Others Unknown

See Section IV(A)(1) above.

- Lockwood is a Repeat Offender and is Facing a Guidelines Range Exceeding 10 Years, if Convicted

See Section IV(A)(1) above.

- Lockwood Engaged in the Charged Criminal Conduct While on Supervised Release for his Prior Tax Evasion Conviction

See Sections IV(A)(2) and IV(B)(1) above.

- Lockwood is the Subject of Another Pending Non-Federal Criminal Investigation

There is an open investigation on Lockwood concerning healthcare fraud.

- Lockwood has Significant International Familiar and Business Connections

See Section IV(A)(1) above.

For all of these reasons, the balance of factors establish that detention is warranted and that no combination of circumstances will ensure his appearances.

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V. CONCLUSION

Based on the foregoing, Lockwood is a serious risk of flight and there is a serious risk that he will attempt to obstruct justice. In addition, there are no combination of conditions that will reasonably assure his appearance. Accordingly, the United States respectfully requests that Lockwood be detained pending trial.

RESPECTFULLY SUBMITTED, May 2, 2022, in Anchorage, Alaska.

S. LANE TUCKER
United States Attorney

s/ Michael J. Heyman
MICHAEL J. HEYMAN
Assistant U.S. Attorney
United States of America

s/ Ahmed Almudallal
AHMED ALMUDALLAL
Trial Attorney
U.S. Department of Justice Tax Division

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2022, a true and correct copy of the foregoing was served electronically on:

Michael Grisham

s/ Michael J. Heyman
Office of the U.S. Attorney