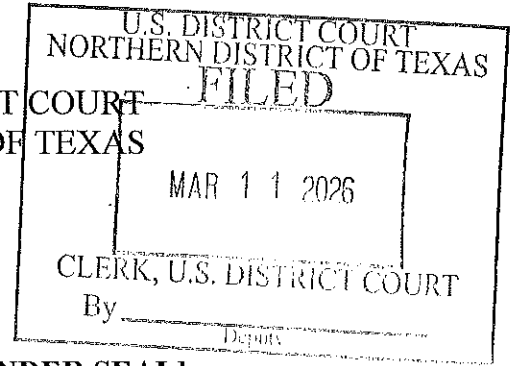


SEALED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

JASON ALLEN LINK (01)
JOSHUA ROBERT LINK (02)

No.

[FILED UNDER SEAL]

4-26CR-060-0

INDICTMENT

The Grand Jury Charges:

At all times material to this Indictment:

General Allegations

The Defendants and Related Entities

1. Shady Brook Ranch, LLC (“Shady Brook Ranch”) was a limited liability company that was registered to do business in Kansas. From in or about July 2020 through at least January 2024, Shady Brook Ranch held the ownership interest in a ranch located in Hope, Kansas. The entity Shady Brook Ranch maintained its primary operating account at Worthington Bank via account no. x8253 (“Shady Brook Ranch operating account”).

2. Agridime, LLC (“Agridime”) was a limited liability company that was registered to do business in Texas, beginning in or about April 2017. From on or about May 12, 2017, through at least January 2024, Agridime operated and was headquartered in Fort Worth, Texas and offered cattle sales along with meat processing, distribution, and retail sales services to the public through individual cattle brokers and online mass marketing.

Agridime paid wages to ranch hands and other individuals who performed work on Shady Brook Ranch property.

3. Defendant **Jason Allen Link** is a current resident of Herington, Kansas and is the brother of defendant **Joshua Robert Link**. From in or about July 2020 through the present, Defendant **Jason Allen Link** solely owned and operated the entity Shady Brook Ranch and exercised sole signature authority and control over the Shady Brook Ranch operating account. From at least 2020 through December 2023, defendant **Jason Allen Link** also served as a Livestock Broker and Meat Chain Director for Agridime.

4. Defendant **Joshua Robert Link** formerly resided in Strafford, Missouri and is the brother of defendant **Jason Allen Link**. From in or about April 2017 through at least December 2023, defendant **Joshua Robert Link** served as a managing member, co-owner, and Executive Director for Agridime.

5. Entity A was a limited liability company that was registered to do business in Kansas in December 2003 and operated in Hope, Kansas. From in or about July 2021 through at least March 2024, Entity A provided feed services for Agridime-controlled cattle maintained on Shady Brook Ranch property, in exchange for monthly payments from Agridime.

6. Individual A was appointed on or about December 11, 2023, to serve as the Agridime Receiver to manage the assets and recoverable assets of Agridime (“Agridime Receiver”). Individual A was appointed via Court Order issued by a United States District Court Judge in the Northern District of Texas, Fort Worth Division, in matter No. 4:23-cv-01224-P.

The relevant Court Order empowered Individual A with “all powers, authorities, rights, and privileges heretofore possessed by the officers, directors, managers and general and limited partners of [Agridime and its equity owners]...”

Count One
Conspiracy to Commit Wire Fraud
(Violation 18 U.S.C. § 1349 (18 U.S.C. § 1343))

7. Paragraphs 1 through 6 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

8. From in or about November 2021, and continuing until in or about January 11, 2024, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants, **Jason Allen Link** and **Joshua Robert Link** (“the defendants”), and others known and unknown, did knowingly and willfully combine, conspire, confederate and agree with each other, to engage in a scheme to defraud Agridime and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises with the intent to defraud those victims, and for the purpose of executing the scheme and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce certain signals and sounds in violation of 18 U.S.C. § 1343, that is, the defendants conspired to knowingly devise and execute a scheme to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations and promises, as further described below, and in furtherance of that scheme caused the transmission of interstate wire communications between Texas, Kansas, Arizona, and other states through electronic means (e.g., emails) and banking transactions.

The Object of the Conspiracy

9. The object of the conspiracy was for the defendants **Jason Allen Link** and **Joshua Robert Link**, and others, to defraud Agridime, along with its owners, and the Agridime Receiver, of its money and property and for defendants to enrich themselves. To that end, the defendants:

- a. Caused Agridime to wire money to the Shady Brook Ranch operating account, that was solely controlled by defendant **Jason Link**, as payment for purported “feed and care” or “feed and yardage” service provided to Agridime-controlled cattle located on Shady Brook Ranch property. In reality, the defendants knew: feed services for cattle were actually provided by Entity A to the relevant Agridime-controlled cattle located on Shady Brook Ranch, thus causing Agridime to pay twice for the same service (i.e., Agridime paid both Entity A and Shady Brook Ranch for the same feed services during the relevant time period); no lease existed between Agridime and Shady Brook Ranch for the use of Shady Brook Ranch land by Agridime-controlled cattle; and no money was owed by Agridime to Shady Brook Ranch for the “care” of Agridime-controlled cattle.

b. Intended to use and did use the funds paid by Agridime to Shady Brook Ranch for purported “feed and care” or “feed and yardage” service of Agridime-controlled cattle to actually pay for defendant **Jason Allen Link** personal expenses and to pay for construction of a luxury residence on the Shady Brook Ranch property for the recreational use of defendants **Jason Allen Link** and **Joshua Robert Link**.

Manner and Means of the Conspiracy and the Scheme to Defraud

10. It was further part of the conspiracy and scheme and artifice to defraud that from at least in or about November 16, 2021, through December 12, 2023, defendant **Joshua Robert Link** sent emails to Agridime accounting personnel falsely claiming payment was due to the Shady Brook Ranch operating account for providing purported feed services for Agridime-controlled cattle that defendants **Joshua Robert Link** and **Jason Allen Link** knew, in reality, they did not cause feed services to be provided and that feed services had already been provided by Entity A. The approximate dates and amounts Entity A calculated that Agridime owed for feed and the approximate dates and amounts the defendants charged Agridime for purported “feed and care” or “feed and yardage” fees are shown in the chart below:

Approximate Date	Approximate Amount Entity A Calculated Agridime Owed for Feed Provided to Cattle at Shady	Approximate Date	Approximate Amount Defendants Charged Agridime for Purported “Feed and Care” or “Feed and Yardage” Provided to Cattle at Shady Brook
November 2021	\$12,930.45	November 16, 2021	\$139,220.00
December 2021	\$8,656.79	December 2, 2021	\$29,200.00

Approximate Date	Approximate Amount Entity A Calculated Agridime Owed for Feed Provided to Cattle at Shady	Approximate Date	Approximate Amount Defendants Charged Agridime for Purported "Feed and Care" or "Feed and Yardage" Provided to Cattle at Shady Brook
January 2022	\$8,330.08	NA	NA
February 2022	\$3,460.23	February 18, 2022	\$72,000.00
March 2022	\$17,736.95	March 21, 2022	\$31,000.00
April 2022	\$20,005.59	April 21, 2022	\$84,400.00
May 2022	\$25,180.44	NA	NA
June 2022	\$37,784.66	June 8, 2022	\$67,425.00
July 2022	\$30,764.13	June 27, 2022	\$28,275.00
August 2022	\$32,316.21	August 18, 2022	\$31,000.00
September 2022	\$27,137.87	October 3, 2022	\$120,273.00
October 2022	\$15,845.60	October 31, 2022	\$64,500.00
November 2022	\$15,737.51	November 9, 2022	\$100,300.00
December 2022	\$41,870.08	December 2, 2022	\$210,000.00
January 2023	\$47,528.55	January 11, 2023	\$206,250.00
February 2023	\$19,522.22	January 26, 2023	\$225,000.00
March 2023	\$7,790.64	March 28, 2023	\$75,000.00
April 2023	\$3,623.97	April 14, 2023	\$150,822.00
May 2023	\$9,615.17	May 22, 2023	\$198,750.00
June 2023	\$10,416.36	June 23, 2023	\$123,750.00
July 2023	\$10,067.57	July 12, 2023	\$225,000.00
August 2023	\$14,923.05	August 11, 2023	\$116,250.00
September 2023	\$27,763.48	September 27, 2023	\$123,000.00
October 2023	\$26,058.79	October 19, 2023	\$147,750.00
November 2023	\$18,016.17	November 22, 2023	\$75,750.00
December 2023	\$14,799.42	December 12, 2023	\$123,750.00

11. It was further part of the conspiracy and scheme and artifice to defraud that from at least in or about October 31, 2022, through November 22, 2023, defendant **Joshua Robert Link** often fraudulently calculated the amount Agridime owed to Shady Brook Ranch for purported “feed and care” or “feed and yardage” service by including mathematical errors in the direction for payment to the Shady Brook Ranch operating account despite knowing no services were actually performed by Shady Brook Ranch.

For example:

- a. On or about February 18, 2022, defendant **Joshua Robert Link** sent an email to Agridime accounting personnel falsely directing Agridime to pay Shady Brook Ranch \$72,000 for 72 head of Agridime-controlled cattle, despite knowing the actual amount owed calculated at the rate of \$750 per head would be only \$51,840; and
- b. On or about September 27, 2023, defendant **Joshua Robert Link** sent an email to Agridime accounting personnel falsely directing Agridime to pay Shady Brook Ranch \$123,000 based on a calculation for Agridime-controlled cattle of “124 head x \$750 per head = \$123,000”, despite knowing the actual amount owed at this rate would be only \$93,000.

12. It was further part of the conspiracy and scheme and artifice to defraud that on or about September 19, 2023, defendant **Joshua Robert Link**, wrote via email to Agridime accounting personnel that Agridime owed “\$750 per head” to Shady Brook Ranch for purported “feed and care” in response to an email request from Agridime accounting personnel asking defendant **Joshua Robert Link** to provide Agridime with a copy of the

purported lease between Agridime and Shady Brook Ranch for care of Agridime-controlled cattle on Shady Brook Ranch property, as shown below:

Since we have a bred cow/pair program set up at Shady Brooke we do the billing on a per head basis at \$750 per head.

Respectfully,
Josh

On Thu, Aug 17, 2023 at 11:41 AM

> wrote:

Hi Josh – based on the conversation the other night regarding the feed and care bill for Shady Brook Ranch, we would like to separate the lease portion from the feed portion.

Can you send us the lease you have with Jason so we can have it on file in the office, as well as tell me what that amount is per month so we can make some corrections.

Having them separate is important from an insurance and IRS standpoint.

13. It was further part of the conspiracy and scheme and artifice to defraud that on or about January 10, 2024, defendant **Jason Allen Link**, wrote via email to Individual A to demand payment of “outstanding invoice that is currently owed” (i.e., payment of \$123,750 directed for payment in a December 12, 2023, email sent by defendant **Joshua Robert Link**, as noted above) from Agridime to the Shady Brook Ranch operating account and falsely stated, among other things, that payment was due based on an outstanding Shady Brook Ranch invoice to Agridime, writing:

If Shady Brook is not paid the outstanding invoice that is currently owed and plus what is due since then, I will have no choice but to start selling cattle to cover those bills.

14. It was further part of the conspiracy and scheme and artifice to defraud that on or about January 11, 2024, defendant **Jason Allen Link**, wrote via email to Individual A to demand payment from Agridime to the Shady Brook Ranch operating account and falsely stated, among other things, that:

- a. Payment was owed to Shady Brook Ranch based on a rate of \$750 per head of cattle basis based on “feed that grows out of the ground” and “...water that they drink and all the yardage/looking after that cattle that is required for calving cattle out.” As shown below:

Yes that is the invoice and how Shady Brook has always been paid. There is still feed that grows out of the ground. All the water that they drink and all the yardage/looking after that cattle that is required for calving cattle out. The charges have always been calculated on a \$750 per head basis. Those cattle are on my property using my resources and this is the same exact terms I have always been paid on.

15. It was further part of the conspiracy and scheme and artifice to defraud that the defendants spent funds from the Shady Brook Ranch operating account on the following personal expenses and luxury items:

- a. \$1,498,275.22 to Weibe Construction to build a 5 bedroom, 4 bathroom “barndominium” luxury residence in Herington, Kansas; and
- b. \$24,838.50 to purchase a 2006 H2 Hummer; and

16. As a result of the scheme, defendants **Jason Allen Link** and **Joshua Robert Link** caused Agridime, to disburse over \$2,664,000 based, in part, on the representation that funds were owed for “feed and care” or “feed and yardage” services, while in reality the defendants each knew those services were provided by Entity A and Agridime paid Entity A for those services.

All done in violation of 18 U.S.C. § 1349.

Counts Two to Three
 Wire Fraud
 (Violation 18 U.S.C. §§ 1343 and 2)

17. Paragraphs 1 through 6 and 9 through 16 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

18. Beginning in or about November 2021, and continuing until on or about January 11, 2024, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendants **Jason Allen Link** and **Joshua Robert Link**, devised, intended to devise, and aided and abetted others in devising, a scheme and artifice to defraud and to obtain money by false and fraudulent pretenses, representations, and promises, as described in paragraphs 9 through 16 above.

19. On or about the dates set forth below, in the Fort Worth Division of the Northern District of Texas and elsewhere, in furtherance of, and for the purpose of executing such scheme and artifice to defraud, defendants identified in the chart below transmitted and caused to be transmitted by means of wire communications in interstate commerce the signals and sounds set forth below:

Count	Description of Wire Transmission	Date of Wire Transmission	Amount of Wire Transmission
Two	Transfer from Agridime Worthington National Bank account no. x2742 to Shady Brook Ranch Worthington National Bank account no. x8253 passing through Worthington National Bank server in Georgia	2/18/22	\$72,000

Three	Transfer from Agridime Worthington National Bank account no. x3203 to Shady Brook Ranch Worthington National Bank account no. x8253 passing through Worthington National Bank server in Georgia	9/27/23	\$123,000
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All done in violation of 18 U.S.C. §§ 1343 and 2.

Counts Four to Five
 Engaging in Monetary Transactions in Property
 Derived from Specified Unlawful Activity
 (Violation of 18 U.S.C. § 1957)

17. Paragraphs 1 through 6 and 9 through 16 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

18. On or about the dates set forth below, in the Northern District of Texas, and elsewhere, defendant identified in the chart below, did knowingly engage and attempt to engage in monetary transactions affecting interstate and foreign commerce in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, wire fraud, a violation of 18 U.S.C. § 1343, the manner of which is as described in the chart below, and each transaction constituting a separate count:

Count	Defendant	Approximate Date	Monetary Transaction
Four	Jason Allen Link (01)	10/26/23	Negotiation of Worthington National Bank Check No. 2089 drawing on Shady Brook Ranch account no. x8253 for \$16,000 made payable to "Kaw Valley Solar LLC" for "Solar Materials"

Count	Defendant	Approximate Date	Monetary Transaction
Five	Jason Allen Link (01)	12/4/23	Negotiation of Worthington National Bank Check No. 2092 drawing on Shady Brook Ranch account no. x8253 for \$30,507.06 made payable to "Weibe Construction LLC" for "Labor/Materials/Plumbing"

All done in violation of 18 U.S.C. §§ 1957 and 2.

NOTICE OF FORFEITURE

(18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1), 28 U.S.C. § 2461(c))

19. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any of the offenses alleged in Counts One through Three of this Indictment, the defendants, **Jason Allen Link** and **Joshua Robert Link** shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any of the offenses alleged in Counts Four through Five of this indictment, the defendant, **Jason Allen Link** shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property.

[Continued on next page]

The items subject to forfeiture include but are not limited to the following:

Real property located at 946 Trail Road in Herington, Kansas

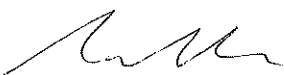
2006 Hummer H2; VIN 5GRGN23U96H103842.

A TRUE BILL.



FOREPERSON

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

v.

JASON ALLEN LINK (01)
JOSHUA ROBERT LINK (02)

INDICTMENT

18 U.S.C. § 1349 (18 U.S.C. § 1343)
Conspiracy to Commit Wire Fraud
Count 1

18 U.S.C. §§ 1343 and 2
Wire Fraud
Counts 2 – 3

18 U.S.C. §§ 1957 and 2
Engaging in Monetary Transactions in Property
Derived from Specified Unlawful Activity
Counts 4 - 5

18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1), 28 U.S.C. § 2461(c)
Forfeiture Notice

A true bill rendered

FORT WORTH

W. D. ...

FOREPERSON

Filed in open court this 11th day of March, 2026.

Warrants to be Issued

Hal R. Ray, Jr.

UNITED STATES MAGISTRATE JUDGE

No Criminal Matter Pending