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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
February 2026 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CLAYTON DEAN SAMPSON, and  
ELISHA SAMPSON,  
  
Defendants.

CR 2:26-cr-00134-AH  
  
I N D I C T M E N T  
  
[18 U.S.C. § 371: Conspiracy to Operate an Illicit Digital Transmission Service; 18 U.S.C. § 2319C: Operation of an Illicit Digital Transmission Service; 18 U.S.C. § 1956(h): Money Laundering Conspiracy; 18 U.S.C. § 982: Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

A. Defendants and Relevant Company

- 1. Defendant CLAYTON DEAN SAMPSON ("CLAYTON SAMPSON") resided in San Bernardino County, California.
- 2. Defendant ELISHA SAMPSON ("ELISHA SAMPSON") resided in San Bernardino County, California.
- 3. Defendants CLAYTON SAMPSON and ELISHA SAMPSON owned, managed, and operated a company called EnvyTV LLC ("EnvyTV"), which

1 defendant CLAYTON SAMPSON later rebranded as The Clay Code Media  
2 Player ("TCCMP" and collectively with EnvyTV, the "Illicit Company").  
3 The Illicit Company provided online video and sports streaming  
4 services, including live sporting events, television shows, and  
5 movies. For a subscription fee of approximately \$69, the Illicit  
6 Company allowed its subscribers to view copyrighted content owned by  
7 various individuals and/or media companies. The Illicit Company did  
8 not hold any licenses for the copyrighted content it distributed to  
9 its subscribers. Beginning in or around 2024, the Illicit Company  
10 also began selling a physical device called the MyStick that was  
11 preloaded with more than 4,000 live channels, 13,000 movies, and  
12 3,000 television shows.

13 B. Victims

14 4. Victim #1, an entity the identity of which is known to the  
15 Grand Jury, was a content provider headquartered in Culver City,  
16 California.

17 5. Victim #2, an entity the identity of which is known to the  
18 Grand Jury, was a content provider headquartered in Burbank,  
19 California.

20 6. Victim #3, an entity the identity of which is known to the  
21 Grand Jury, was a content provider headquartered in Universal City,  
22 California.

23 7. Victim #4, an entity the identity of which is known to the  
24 Grand Jury, was a content provider headquartered in Los Gatos,  
25 California.

26 8. Victim #5, an entity the identity of which is known to the  
27 Grand Jury, was a content provider headquartered in Englewood,  
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1 Colorado. Victims #1 through #5 are collectively referred to as the  
2 Video Content Providers.

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1 Company's websites and digital transmission services, including a  
2 virtual server in Nepal.

3 5. Defendants CLAYTON SAMPSON and ELISHA SAMPSON would open  
4 bank accounts with U.S. financial institutions to operate the Illicit  
5 Company and would receive more than \$4,000,000 in payments from  
6 subscribers of the illicit digital transmission service.

7 6. An unindicted co-conspirator would help develop a physical  
8 device called the MyStick that was preloaded with content copyrighted  
9 and owned by the Video Content Providers.

10 7. Defendants CLAYTON SAMPSON and ELISHA SAMPSON would sell  
11 the MyStick device to the Illicit Company's customers.

12 8. Defendants CLAYTON SAMPSON and ELISHA SAMPSON would  
13 publicly promote the Illicit Company's digital transmission service  
14 via various social media platforms.

15 9. The overall scheme to operate the Illicit Company involved  
16 the distribution of more than 4,000 live channels, 13,000 movies, and  
17 3,000 television shows copyrighted and owned by the Video Content  
18 Providers.

19 C. OVERT ACTS

20 In furtherance of the conspiracy and to accomplish its objects,  
21 on or about the following dates, defendants CLAYTON SAMPSON and  
22 ELISHA SAMPSON, and others known and unknown to the Grand Jury,  
23 committed various overt acts within the Central District of  
24 California and elsewhere, including, but not limited to, the  
25 following:

26 Overt Act No. 1: On December 18, 2018, defendants CLAYTON  
27 SAMPSON and ELISHA SAMPSON registered EnvyTV with the Nevada  
28 Secretary of State.

1           Overt Act No. 2:       On an unknown date but no later than  
2 December 31, 2018, defendant CLAYTON SAMPSON created a group on a  
3 social media site titled "EnvySocial" (the "Envy Social Media  
4 Group").

5           Overt Act No. 3:       On February 5, 2019, defendant ELISHA  
6 SAMPSON submitted an application to a payment processor to process  
7 payments for EnvyTV for the sale of content copyrighted and owned by  
8 the Video Content Providers.

9           Overt Act No. 4:       On October 4, 2021, defendant CLAYTON  
10 SAMPSON posted on the Envy Social Media Group: "Please support our  
11 streaming of 818 channels including ALL sports and PPV (pay per view)  
12 . . . you will find chat support at www[.]tccmp[.]com."

13           Overt Act No. 5:       On February 8, 2024, a co-conspirator based  
14 in Nepal became an administrator of the Envy Social Media Group.

15           Overt Act No. 6:       On July 16, 2024, defendants CLAYTON SAMPSON  
16 and ELISHA SAMPSON approved a subscription to TCCMP for \$89.97 per  
17 month for someone the co-conspirators believed was a customer, but  
18 who was in fact an undercover law enforcement agent located in the  
19 Central District of California (the "UC").

20           Overt Act No. 7:       On July 29, 2024, a co-conspirator caused  
21 the shipment of a MyStick loaded with content copyrighted and owned  
22 by the Video Content Providers to the UC at an address located within  
23 the Central District of California.

24           Overt Act No. 8:       On August 12, 2024, co-conspirators,  
25 including defendants CLAYTON SAMPSON and ELISHA SAMPSON, caused a  
26 program to be digitally transmitted in the Central District of  
27 California without the authority of the copyright owner, namely,  
28 Victim #2.

1           Overt Act No. 9:       On August 13, 2024, co-conspirators,  
2 including defendants CLAYTON SAMPSON and ELISHA SAMPSON, caused a  
3 program to be digitally transmitted in the Central District of  
4 California without the authority of the copyright owner, namely,  
5 Victim #4.

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COUNT TWO

[ALL DEFENDANTS]

[18 U.S.C. §§ 2319C(b)(1), 2139C(c)(1), 2(a)]

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4 1. The Grand Jury re-alleges and incorporates paragraphs 1  
5 through 8 of the Introductory Allegations of this Indictment.

6 2. Beginning in or around December 2018 and continuing until  
7 in or around December 2024, in Los Angeles and San Bernardino  
8 Counties, within the Central District of California, and elsewhere,  
9 defendants CLAYTON SAMPSON and ELISHA SAMPSON, each aiding and  
10 abetting the other, did willfully, and for purposes of commercial  
11 advantage and private financial gain, offer and provide to the public  
12 a digital transmission service that was primarily designed and  
13 provided for the purpose of publicly performing works protected under  
14 Title 17 of the United States Code by means of digital transmission  
15 without the authority of the copyright owners, including, but not  
16 limited to, the Video Content Providers, or the law.

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1           b. Defendant CLAYTON SAMPSON would receive payments from  
2 subscribers of the Illicit Company in the 1092 Account.

3           c. Defendant CLAYTON SAMPSON would use the funds received  
4 from the subscribers of the Illicit Company for business and personal  
5 expenses, and to further promote the defendant's copyright  
6 infringement scheme.

7           d. Defendant CLAYTON SAMPSON would engage in  
8 international financial transactions to further the Illicit Company's  
9 business operations, including causing payments from the 1092 Account  
10 to one or more co-conspirators located in Nepal.

11 C. OVERT ACTS

12           In furtherance of the conspiracy, and to accomplish its object,  
13 defendant CLAYTON SAMPSON, together with others known and unknown to  
14 the Grand Jury, on or about the dates set forth below, committed the  
15 following overt acts, among others, in the Central District of  
16 California and elsewhere:

17           Overt Act No. 1: On April 2, 2021, defendant CLAYTON SAMPSON  
18 sent an international wire transfer of \$500 from the 1092 Account to  
19 a bank account a co-conspirator controlled as payment for the co-  
20 conspirator's services related to the Illicit Company.

21           Overt Act No. 2: On August 27, 2021, defendant CLAYTON  
22 SAMPSON sent an international wire transfer of \$500 from the 1092  
23 Account to a bank account a co-conspirator controlled as payment for  
24 the co-conspirator's services related to the Illicit Company.

25           Overt Act No. 3: On September 3, 2021, defendant CLAYTON  
26 SAMPSON sent an international wire transfer of \$500 from the 1092  
27 Account to a bank account a co-conspirator controlled as payment for  
28 the co-conspirator's services related to the Illicit Company.

1           Overt Act No. 4:       On March 4, 2022, defendant CLAYTON SAMPSON  
2 sent an international wire transfer of \$500 from the 1092 Account to  
3 a bank account a co-conspirator controlled as payment for the co-  
4 conspirator's services related to the Illicit Company.

5           Overt Act No. 5:       On April 8, 2022, defendant CLAYTON SAMPSON  
6 sent an international wire transfer of \$500 from the 1092 Account to  
7 a bank account a co-conspirator controlled as payment for the co-  
8 conspirator's services related to the Illicit Company.

9           Overt Act No. 6:       On April 19, 2022, defendant CLAYTON SAMPSON  
10 sent an international wire transfer of \$500 from the 1092 Account to  
11 a bank account a co-conspirator controlled as payment for the co-  
12 conspirator's services related to the Illicit Company.

13           Overt Act No. 7:       On July 15, 2022, defendant CLAYTON SAMPSON  
14 sent an international wire transfer of \$500 from the 1092 Account to  
15 a bank account a co-conspirator controlled as payment for the co-  
16 conspirator's services related to the Illicit Company.

17           Overt Act No. 8:       On July 15, 2022, defendant CLAYTON SAMPSON  
18 sent an international wire transfer of \$500 from the 1092 Account to  
19 a bank account a co-conspirator controlled as payment for the co-  
20 conspirator's services related to the Illicit Company.

21           Overt Act No. 9:       On June 29, 2023, defendant CLAYTON SAMPSON  
22 sent an international wire transfer of \$500 from the 1092 Account to  
23 a bank account a co-conspirator controlled as payment for the co-  
24 conspirator's services related to the Illicit Company.

25           Overt Act No. 10:     On October 13, 2023, defendant CLAYTON  
26 SAMPSON sent an international wire transfer of \$500 from the 1092  
27 Account to a bank account a co-conspirator controlled as payment for  
28 the co-conspirator's services related to the Illicit Company.

FORFEITURE ALLEGATION  
[18 U.S.C. § 982]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States will seek  
5 forfeiture as part of any sentence, pursuant to Title 18, United  
6 States Code, Section 982(a)(1), in the event of any defendant's  
7 conviction of the offenses set forth in Count Three of this  
8 Indictment.

9 2. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 (a) Any property, real or personal, involved in such  
12 offense, and any property traceable to such property; and

13 (b) To the extent such property is not available for  
14 forfeiture, a sum of money equal to the total value of the property  
15 described in subparagraph (a).

16 3. Pursuant to Title 21, United States Code, Section 853(p), as  
17 incorporated by Title 18, United States Code, Section 982(b)(1), and  
18 Title 18, United States Code, Section 982(b)(2), any defendant so  
19 convicted shall forfeit substitute property, if, by any act or  
20 omission of the defendant, the property described in the preceding  
21 paragraph, or any portion thereof: (a) cannot be located upon the  
22 exercise of due diligence; (b) has been transferred, sold to, or  
23 deposited with a third party; (c) has been placed beyond the  
24 jurisdiction of the court; (d) has been substantially diminished in  
25 value; or

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1 (e) has been commingled with other property that cannot be divided  
2 without difficulty. Substitution of assets shall not be ordered,  
3 however, where the convicted defendant acted merely as an  
4 intermediary who handled but did not retain the property in the  
5 course of the money laundering offense unless the defendant, in  
6 committing the offense or offenses giving rise to the forfeiture,  
7 conducted three or more separate transactions involving a total of  
8 \$100,000.00 or more in any twelve-month period.

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11 A TRUE BILL

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14 /S/  
Foreperson

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16 TODD BLANCHE  
Deputy Attorney General

17 BILAL A. ESSAYLI  
18 First Assistant United States  
Attorney

19   
20  
21 IAN V. YANNIELLO  
Assistant United States Attorney  
22 Chief, National Security Division

23 ANGELA MAKABALI  
Assistant United States Attorney  
24 National Security Division

25 COLIN S. SCOTT  
Assistant United States Attorney  
26 National Security Division