

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 21 CR 244
v.)	
)	Violation: Title 18, United States Code,
NATHAN R. CHAVIS)	Section 1344

The SPECIAL APRIL 2021 GRAND JURY charges:

1. At times material to this Indictment:
 - a. The United States Postal Service (“USPS”) sold money orders, up to a value of \$1,000, at post offices nationwide.
 - b. When a USPS money order was purchased, its dollar value was printed on the money order.
 - c. Bank B, Bank D, Bank E, and Bank F were financial institutions with branches in the Northern District of Illinois, and elsewhere, and whose deposits were insured by the Federal Deposit Insurance Corporation.
2. Beginning in or around January 2018 and continuing through in or around November 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

NATHAN R. CHAVIS,

defendant herein, and others, knowingly participated in a scheme to defraud a financial institution and to obtain money and funds owned by and under the custody

and control of a financial institution by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that defendant CHAVIS obtained and caused to be obtained USPS money orders that were altered and counterfeited, presented the altered and counterfeited money orders to financial institutions, including Bank B, Bank D, Bank E, and Bank F, and deposited and caused the deposit of the altered and counterfeited money orders into third-party bank accounts, thereby fraudulently inflating the account balances in the accounts. It was part of the scheme that CHAVIS withdrew and spent, and caused to be withdrawn and spent, funds from the third-party bank accounts, and kept the proceeds of the scheme.

4. It was further part of the scheme that defendant CHAVIS purchased and caused to be purchased USPS money orders from post offices in amounts less than approximately \$10, so that the money orders could be altered to higher amounts, typically between \$800 and \$1,000.

5. It was further part of the scheme that defendant CHAVIS recruited and caused to be recruited third parties in order to obtain access to bank accounts belonging to the third parties, knowing that the third-party accounts would be used to deposit money orders that were altered to amounts that were higher than their actual value.

6. It was further part of the scheme that defendant CHAVIS knowingly deposited and caused to be deposited altered and counterfeited money orders into

third-party bank accounts to which he had access, for the purpose of fraudulently inflating the balances in those third-party bank accounts.

7. It was further part of the scheme that defendant CHAVIS, knowing that altered and counterfeited money orders had been deposited into the third-party bank accounts to which he had access, made and caused to be made withdrawals and purchases from the third-party bank accounts, and collected and kept money from financial institutions.

8. It was further part of the scheme that defendant CHAVIS misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, certain material facts, including the acts and purposes of the acts done in furtherance of the scheme.

9. As a result of the scheme, defendant CHAVIS caused at least \$158,610 in altered and counterfeit money orders to be deposited into third-party bank accounts.

10. On or about the following dates, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant CHAVIS knowingly executed the above-described scheme by causing the following transactions involving accounts at financial institutions:

<u>Count</u>	<u>Date</u>	<u>Transaction</u>
One	Jan 10 2018	\$2,970 deposit into Individual A's account at Bank D
Two	Apr 30 2018	\$990 deposit into Individual B's account at Bank F
Three	May 1 2018	\$1,980 deposit into Individual B's account at Bank B
Four	Jun 12 2018	\$1,980 deposit into Individual C's account at Bank B
Five	Nov 9 2018	\$2,970 deposit into Individual D's account at Bank E

In violation of Title 18, United States Code, Section 1344.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY