

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SAMUEL W. JACKSON,  
DAVID L. SULLIVAN II, and  
ELIZABETH A. CHERVINKO

No.

Violations: Title 18, United States  
Code, Sections 1343 and 1957

Under Seal

**COUNT ONE**

The SPECIAL MAY 2021 GRAND JURY charges:

1. At times material to this Indictment:

***Small Business Administration***

a. The U.S. Small Business Administration (“SBA”) was a United States government agency that provided support to small businesses.

***Paycheck Protection Program***

b. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic.

c. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program called the Paycheck Protection Program (“PPP”). In or around April 2020, Congress authorized over \$320 billion in additional funding for PPP loans.

d. To obtain a PPP loan, a business submitted a PPP loan application, which was signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications regarding its eligibility. In the application, the small business's authorized representative was required to provide, among other things, the business's average monthly payroll expenses and number of employees. These figures were used to calculate the business's eligibility and the amount of money it could receive under the PPP. Applicants also were required to make good faith certifications, including that economic uncertainties necessitated their loan requests for continued business operations.

e. PPP loan proceeds were required to be used by the business for certain permissible expenses – payroll costs, mortgage interest, rent, and utilities. The PPP allowed the interest and principal on a PPP loan to be entirely forgiven by the SBA if the business spent the loan proceeds on these items within a designated period of time and used at least a certain percentage of the PPP loan for payroll expenses.

f. To obtain funds through the PPP, small businesses applied through lenders and loan service providers participating in the PPP and, if approved, received the loans from those lenders, either directly or through loan service providers.

g. Participating lenders and loan service providers required applicants for PPP loans to provide truthful information about the business and its owner, including truthful information about the business's operating expenses, the business's employees, and how the PPP loan would be used, which information was material to lenders' approval, terms, and funding of loans.

***Economic Injury Disaster Loan Program***

h. Another source of relief provided by the CARES Act and other pandemic-relief legislation was the expansion of the Economic Injury Disaster Loan ("EIDL") Program, which provided loan assistance (including advances of up to \$10,000) for businesses with 500 or fewer employees and other eligible entities. The EIDL Program was designed to provide economic relief to small businesses that were experiencing a temporary loss of revenue.

i. To obtain funds through the EIDL Program, small businesses applied through the SBA via an online portal and application. As part of the EIDL application process, the SBA required applicants to submit truthful information concerning the business and the business owner, including the business's number of employees as of January 31, 2020; gross revenues for the 12 months prior to the disaster (*i.e.*, prior to January 31, 2020); cost of goods sold for the 12 months prior to the disaster; and lost rental income due to the disaster. Applicants were required to electronically certify that the information provided was accurate.

j. EIDL loan proceeds were permitted to be used to pay an array of working capital and normal operating expenses, such as continuation of health care benefits, rent, utilities, and fixed debt payments.

k. EIDL Advance was a grant program offered together with the EIDL program. The amount of the advance issued to the small business applicant was determined by the number of employees indicated on the EIDL application, \$1,000 per employee, up to \$10,000.

l. The information provided by small business applicants was material to SBA's issuance of EIDL funds, which were drawn directly from the United States Treasury.

### ***Entities***

m. Dream Builder, L.L.C. ("Dream Builder") was a Montana limited liability company registered in March 2020.

n. Ordained Destination L.L.C. ("Ordained Destination") was a Montana limited liability company registered in February 2020.

o. Ordained Real Estate, L.L.C. ("Ordained Real Estate"), formerly known as Ordained Auto Leasing, L.L.C., was a Montana limited liability company registered in September 2018.

p. Tips @ 170, Inc. ("Tips @ 170") was an Illinois corporation incorporated in March 2011.

q. Top Flight Real Estate, L.L.C. ("Top Flight") was an Illinois limited liability company registered in February 2015.

### ***Defendants***

r. Defendant SAMUEL W. JACKSON was a resident of Chicago, Illinois. JACKSON was a member manager of Ordained Destination and Ordained Real Estate, and a manager of Top Flight.

s. Defendant DAVID L. SULLIVAN II was a resident of Naperville, Illinois. SULLIVAN was the president and a director of Tips @ 170, a member manager of Ordained Real Estate, and a manager of Top Flight.

t. Defendant ELIZABETH A. CHERVINKO was a resident of Chicago, Illinois. CHERVINKO was a member manager of Ordained Destination.

### ***Lenders***

u. Loan Service Provider A was a financial technology company which processed PPP applications on behalf of financial institutions, including Lender C. Loan Service Provider A maintained computer servers that were located outside of Illinois.

v. Lender A was a financial technology company which processed PPP applications and funded PPP loans to approved borrowers.

w. Lender B was a financial technology company which processed PPP applications and funded PPP loans to approved borrowers.

x. Lender C was a financial institution which funded PPP loans to approved borrowers.

### ***Scheme to Defraud***

2. Beginning in or around March 2020, and continuing until in or around July 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON,  
DAVID L. SULLIVAN II, and  
ELIZABETH A. CHERVINKO,

defendants herein, knowingly devised, intended to devise, and participated in a scheme to defraud and to obtain money and property, in connection with applications for PPP and EIDL funds, by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that JACKSON, SULLIVAN, and CHERVINKO, for the purpose of fraudulently obtaining PPP and EIDL funds, submitted and caused to be submitted fraudulent applications and supporting documents to lenders, loan service providers, and the SBA, which applications and supporting documents contained materially false representations concerning, among other things, the defendants' entities' purported employees, revenue, payroll and other expenses, and lost rental income.

### ***PPP Applications & Loans***

#### ***Ordained Destination***

4. It was further part of the scheme that, on or about May 11, 2020, JACKSON and CHERVINKO submitted and caused to be submitted to Loan Service Provider A an online PPP loan application and supporting documents for Ordained

Destination as the borrower, knowing that the application materials contained false and fraudulent representations and documents.

5. It was further part of the scheme that JACKSON and CHERVINKO submitted and caused to be submitted to Loan Service Provider A the PPP loan application, knowing that it contained false and fraudulent information regarding Ordained Destination's annual revenue.

6. It was further part of the scheme that JACKSON and CHERVINKO submitted and caused to be submitted to Loan Service Provider A falsified Bank of America account statements, which, as JACKSON and CHERVINKO knew, contained false and fraudulent representations regarding Ordained Destination's bank account balances.

7. It was further part of the scheme that JACKSON and CHERVINKO submitted and caused to be submitted to Loan Service Provider A a falsified tax form, which, as JACKSON and CHERVINKO knew, contained false and fraudulent representations regarding Ordained Destination's number of employees and payment of employee wages, tips, and other compensation.

8. It was further part of the scheme that, on or about May 22, 2020, JACKSON and CHERVINKO submitted and caused to be submitted to Lender A an online PPP loan application and supporting documents for Ordained Destination as the borrower, knowing that the application materials contained false and fraudulent representations and documents.

9. It was further part of the scheme that JACKSON and CHERVINKO submitted and caused to be submitted to Lender A the PPP loan application, knowing that it contained false and fraudulent representations regarding: (a) Ordained Destination's number of employees; (b) Ordained Destination's average monthly payroll; (c) the intended use of the PPP loan funds; and (d) the truthfulness and accuracy of the application and supporting documents.

10. It was further part of the scheme that JACKSON and CHERVINKO submitted and caused to be submitted to Lender A a falsified tax form which, as JACKSON and CHERVINKO knew, contained false and fraudulent representations regarding Ordained Destination's number of employees and payment of employee wages, tips, and other compensation.

11. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application and supporting materials, JACKSON and CHERVINKO caused Lender A to disburse a PPP loan of approximately \$392,927, on or about June 1, 2020, into an Ordained Destination account maintained at Bank of America, when, as JACKSON and CHERVINKO knew, neither they nor Ordained Destination were entitled to the PPP loan funds.

12. It was further part of the scheme that, on or about June 1, 2020, at JACKSON's direction and for the purpose of concealing the funds, CHERVINKO transferred the approximately \$392,927 in PPP loan funds, from the Ordained Destination Bank of America account into which they were received, to another Ordained Destination account at Bank of America.



***Ordained Real Estate***

13. It was further part of the scheme that, on or about May 12, 2020, JACKSON and SULLIVAN submitted and caused to be submitted to Loan Service Provider A an online PPP loan application and supporting documents for Ordained Real Estate as the borrower, knowing that the application materials contained false and fraudulent representations and documents.

14. It was further part of the scheme that JACKSON and SULLIVAN submitted and caused to be submitted to Loan Service Provider A the PPP loan application, knowing it contained false and fraudulent information regarding Ordained Real Estate's annual revenue.

15. It was further part of the scheme that JACKSON and SULLIVAN submitted and caused to be submitted to Loan Service Provider A a falsified U.S. Bank account statement, which, as JACKSON and SULLIVAN knew, contained false and fraudulent representations regarding Ordained Real Estate's bank account balances.

16. It was further part of the scheme that, on or about May 18, 2020, JACKSON submitted and caused to be submitted to Loan Service Provider A a second online PPP loan application and supporting documents for Ordained Real Estate as the borrower, knowing that the application materials contained false and fraudulent representations and documents.

17. It was further part of the scheme that JACKSON submitted and caused to be submitted to Loan Service Provider A the PPP loan application, knowing it

contained false and fraudulent representations regarding: (a) Ordained Real Estate's number of employees; (b) Ordained Real Estate's average monthly payroll; (c) the intended use of the PPP loan funds; and (d) the truthfulness and accuracy of the application and supporting documents.

18. It was further part of the scheme that JACKSON submitted and caused to be submitted to Loan Service Provider A falsified tax forms, which, as JACKSON knew, contained false and fraudulent representations regarding Ordained Real Estate's number of employees and payment of employee wages, tips, and other compensation.

19. It was further part of the scheme that JACKSON submitted and caused to be submitted to Loan Service Provider A a falsified U.S. Bank account statement, which, as JACKSON knew, contained false and fraudulent representations regarding Ordained Real Estate's bank account balances.

20. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application and supporting materials, JACKSON caused Lender C to disburse a PPP loan of \$850,000, on or about May 19, 2020, into an Ordained Real Estate account maintained at U.S. Bank, when, as JACKSON knew, neither he nor Ordained Real Estate was entitled to the PPP loan funds.

21. It was further part of the scheme that, on or about May 19, 2020, SULLIVAN, at JACKSON's direction, transferred the \$850,000 in PPP loan funds from the Ordained Real Estate U.S. Bank account into which they were received, to

another Ordained Real Estate U.S. Bank account to prevent the funds from being recalled by Lender C.

***Top Flight***

22. It was further part of the scheme that, on or about May 13, 2020, JACKSON, using SULLIVAN's identity, submitted and caused to be submitted to Lender B an online PPP loan application and supporting documents for Top Flight as the borrower, knowing that the application materials contained false and fraudulent representations and documents.

23. It was further part of the scheme that JACKSON submitted and caused to be submitted to Lender B the PPP loan application, knowing it contained false and fraudulent representations regarding: (a) who submitted the application; (b) Top Flight's number of employees; (c) Top Flight's average monthly payroll; (d) the intended use of the PPP loan funds; and (e) the truthfulness and accuracy of the application and supporting documents.

24. It was further part of the scheme that JACKSON submitted and caused to be submitted to Lender B falsified tax forms, which, as JACKSON knew, contained false and fraudulent representations regarding Top Flight's number of employees and payment of employee wages, tips, and other compensation.

25. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application and supporting materials, JACKSON caused Lender B to disburse a PPP loan of \$461,011, on or about May 14, 2020, into

a Top Flight account maintained at Chase Bank, when, as JACKSON knew, neither he nor Top Flight was entitled to the PPP loan funds.

***Tips @ 170***

26. It was further part of the scheme that, on or about June 22, 2020, JACKSON and SULLIVAN submitted and caused to be submitted to Lender A an online PPP loan application and supporting documents for Tips @ 170 as the borrower, knowing that the application materials contained false and fraudulent representations and documents.

27. It was further part of the scheme that JACKSON and SULLIVAN submitted and caused to be submitted to Lender A the PPP loan application, knowing it contained false and fraudulent representations regarding: (a) Tips @ 170's number of employees; (b) Tips @ 170's average monthly payroll; (c) the intended use of the PPP loan funds; and (d) the truthfulness and accuracy of the application and supporting documents.

28. It was further part of the scheme that JACKSON and SULLIVAN submitted and caused to be submitted to Lender A falsified tax forms, which, as JACKSON and SULLIVAN knew, contained false and fraudulent representations regarding Tips @ 170's number of employees and payment of employee wages, tips, and other compensation.

29. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application and supporting materials, JACKSON and SULLIVAN caused Lender A to disburse a PPP loan of approximately \$791,104, on

or about July 22, 2020, into a Tips @ 170 account maintained at U.S. Bank, when, as JACKSON and SULLIVAN knew, neither they nor Tips @ 170 were entitled to the PPP loan funds.

### ***EIDL Applications & Loans***

#### ***Ordained Destination***

30. It was further part of the scheme that, on or about March 31, 2020, JACKSON submitted and caused to be submitted to the SBA an online EIDL application for Ordained Destination as the borrower, knowing that the application contained false and fraudulent representations.

31. It was further part of the scheme that JACKSON submitted and caused to be submitted to the SBA the March 31, 2020 EIDL application for Ordained Destination, knowing it contained false and fraudulent representations regarding: (a) Ordained Destination's rental losses due to the disaster; and (b) the truthfulness and accuracy of the information in the application.

32. It was further part of the scheme that, on or about April 2, 2020, JACKSON submitted and caused to be submitted to the SBA an online EIDL application for Ordained Destination as the borrower, knowing that the application contained false and fraudulent representations.

33. It was further part of the scheme that JACKSON submitted and caused to be submitted to the SBA the April 2, 2020 EIDL application for Ordained Destination, knowing it contained false and fraudulent representations regarding: (a) Ordained Destination's number of employees; (b) Ordained Destination's rental

losses due to the disaster; and (c) the truthfulness and accuracy of the information in the application.

34. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON caused the SBA to disburse an EIDL advance of \$1,000, on or about July 14, 2020, into an Ordained Destination account maintained at Bank of America when, as JACKSON knew, neither he nor Ordained Destination was entitled to the EIDL advance funds.

***Top Flight***

35. It was further part of the scheme that, on or about April 2, 2020, JACKSON submitted and caused to be submitted to the SBA an online EIDL application for Top Flight as the borrower, knowing that the application contained false and fraudulent representations.

36. It was further part of the scheme that JACKSON submitted and caused to be submitted to the SBA the EIDL application for Top Flight, knowing it contained false and fraudulent representations regarding: (a) Top Flight's number of employees; (b) Top Flight's gross revenues; (c) Top Flight's cost of goods sold; and (d) the truthfulness and accuracy of the information in the application.

37. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON caused the SBA to disburse an EIDL advance of \$10,000, on or about April 27, 2020, into a Top Flight account maintained at Chase Bank, when, as JACKSON knew, neither he nor Top Flight was entitled to the EIDL advance funds.

38. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON caused the SBA to disburse an EIDL of \$149,900, on or about June 4, 2020, into a Top Flight account maintained at Chase Bank, when, as JACKSON knew, neither he nor Top Flight was entitled to the EIDL funds.

***Tips @ 170***

39. It was further part of the scheme that, on or about April 3, 2020, JACKSON and SULLIVAN submitted and caused to be submitted to the SBA an online EIDL application for Tips @ 170 as the borrower, knowing that the application contained false and fraudulent representations.

40. It was further part of the scheme that JACKSON and SULLIVAN submitted and caused to be submitted to the SBA the EIDL application for Tips @ 170, knowing it contained false and fraudulent representations regarding: (a) Tips @ 170's number of employees; (b) Tips @ 170's gross revenues; (c) Tips @ 170's cost of goods sold; and (d) the truthfulness and accuracy of the information in the application.

41. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON and SULLIVAN caused the SBA to disburse an EIDL advance of \$6,000, on or about April 29, 2020, into a Tips @ 170 account maintained at U.S. Bank. JACKSON and SULLIVAN knew at the time that neither they nor Tips @ 170 were entitled to the EIDL advance funds.

### ***Ordained Real Estate***

42. It was further part of the scheme that, on or about April 6, 2020, JACKSON and SULLIVAN submitted and caused to be submitted to the SBA an online EIDL application for Ordained Real Estate as the borrower, knowing that the application contained false and fraudulent representations.

43. It was further part of the scheme that JACKSON and SULLIVAN submitted and caused to be submitted to the SBA the EIDL application for Ordained Real Estate, knowing it contained false and fraudulent representations regarding: (a) Ordained Real Estate's number of employees; (b) Ordained Real Estate's gross revenues; (c) Ordained Real Estate's cost of goods sold; (d) Ordained Real Estate's rental losses due to the disaster; and (e) the truthfulness and accuracy of the information in the application.

44. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON and SULLIVAN caused the SBA to disburse an EIDL of \$49,400, on or about June 23, 2020, into an Ordained Real Estate account maintained at U.S. Bank, when, as JACKSON and SULLIVAN knew, neither they nor Ordained Real Estate were entitled to the EIDL funds.

45. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON and SULLIVAN caused the SBA to disburse an EIDL advance of \$10,000, on or about June 30, 2020, into an Ordained Real Estate account maintained at U.S. Bank, when, as JACKSON and SULLIVAN



knew, neither they nor Ordained Real Estate were entitled to the EIDL advance funds.

***Dream Builder***

46. It was further part of the scheme that, on or about April 6, 2020, JACKSON and SULLIVAN submitted and caused to be submitted to the SBA an online EIDL application for Dream Builder as the borrower, knowing that the application contained false and fraudulent representations.

47. It was further part of the scheme that JACKSON and SULLIVAN submitted and caused to be submitted to the SBA the EIDL application for Dream Builder, knowing it contained false and fraudulent representations regarding: (a) Dream Builder's number of employees; (b) Dream Builder's gross revenues; (c) Dream Builder's cost of goods sold; and (d) the truthfulness and accuracy of the information in the application.

48. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON and SULLIVAN caused the SBA to disburse an EIDL advance of \$10,000, on or about May 1, 2020, into a Dream Builder account maintained at Fifth Third Bank, when, as JACKSON and SULLIVAN knew, neither they nor Dream Builder were entitled to the EIDL advance funds.

***Jackson, Sullivan & Chervinko***

49. It was further part of the scheme that, on or about June 29, 2020, JACKSON and CHERVINKO submitted and caused to be submitted to the SBA an

online EIDL application for CHERVINKO as the borrower, knowing that the application contained false and fraudulent representations.

50. It was further part of the scheme that JACKSON and CHERVINKO submitted and caused to be submitted to the SBA the EIDL application for CHERVINKO, knowing it contained false and fraudulent representations regarding: (a) CHERVINKO's operation of a proprietorship in the agriculture industry; (b) CHERVINKO's number of employees; (c) CHERVINKO's gross revenues; and (d) the truthfulness and accuracy of the information in the application.

51. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON and CHERVINKO caused the SBA to disburse an EIDL advance of \$10,000, on or about June 30, 2020, into a CHERVINKO account maintained at Chase Bank, when, as JACKSON and CHERVINKO knew, neither they nor CHERVINKO's purported sole proprietorship were entitled to the EIDL advance funds.

52. It was further part of the scheme that, on or about June 29, 2020, JACKSON and SULLIVAN submitted and caused to be submitted to the SBA an online EIDL application for SULLIVAN as the borrower, knowing that the application contained false and fraudulent representations.

53. It was further part of the scheme that JACKSON and SULLIVAN submitted and caused to be submitted to the SBA the EIDL application for SULLIVAN, knowing it contained false and fraudulent representations regarding: (a) SULLIVAN's operation of a sole proprietorship in the agriculture industry;

(b) SULLIVAN's number of employees; (c) SULLIVAN's gross revenues; and (d) the truthfulness and accuracy of the information in the application.

54. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, JACKSON and SULLIVAN caused the SBA to disburse an EIDL advance of \$10,000, on or about June 30, 2020, into a SULLIVAN account maintained at Charles Schwab Bank, when, as JACKSON and SULLIVAN knew, neither they nor SULLIVAN's purported sole proprietorship were entitled to the EIDL advance funds.

#### ***Receipt and Use of Fraudulent Proceeds***

55. It was further part of the scheme that JACKSON, SULLIVAN, and CHERVINKO defrauded lenders of approximately \$2,495,043 in fraudulently obtained PPP loan funds, much of which were used for the defendants' personal benefit, including the purchase of real estate, personal expenses, and the lease and purchase of luxury and other automobiles.

56. It was further part of the scheme that JACKSON, SULLIVAN, and CHERVINKO defrauded the SBA of approximately \$256,500 in fraudulently obtained EIDL and EIDL advance funds, much of which were used for the defendants' personal benefit, including the purchase of real estate, personal expenses, and the lease and purchase of luxury and other automobiles.

57. It was further part of the scheme that JACKSON, SULLIVAN, and CHERVINKO 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.

58. On or about May 11, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely an internet transmission of an Ordained Destination PPP loan application to Loan Service Provider A's computer servers located outside of Illinois;

In violation of Title 18, United States Code, Section 1343.

## **COUNT TWO**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraphs 1 through 57 of Count One are incorporated here.
2. On or about May 14, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely an interstate wire transmission of approximately \$461,011, from a Lender B bank account to a Top Flight account maintained at Chase Bank, which funds represented the proceeds of a PPP loan to Top Flight;

In violation of Title 18, United States Code, Section 1343.

### **COUNT THREE**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraphs 1 through 57 of Count One are incorporated here.
2. On or about June 1, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON and  
ELIZABETH A. CHERVINKO,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely an interstate wire transmission of approximately \$392,927, from a Lender A bank account to an Ordained Destination account maintained at Bank of America, which funds represented the proceeds of a PPP loan to Ordained Destination;

In violation of Title 18, United States Code, Section 1343.

#### **COUNT FOUR**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraphs 1 through 57 of Count One are incorporated here.
2. On or about June 4, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely an interstate wire transmission of \$850,000, from Lender C to an Ordained Real Estate account maintained at U.S. Bank, which funds represented the proceeds of a PPP loan to Ordained Real Estate;

In violation of Title 18, United States Code, Section 1343.

### **COUNT FIVE**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraphs 1 through 57 of Count One are incorporated here.
2. On or about June 23, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON and  
DAVID L. SULLIVAN II,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transmission of \$49,400, from the Federal Reserve Bank to an Ordained Real Estate account maintained at U.S. Bank, which funds represented the proceeds of an EIDL to Ordained Real Estate;

In violation of Title 18, United States Code, Section 1343.



## COUNT SIX

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraphs 1.q. and 1.r. of Count One are incorporated here.
2. On or about June 24, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON,

defendant herein, knowingly engaged in a monetary transaction, namely, the transfer of \$50,000 from a Top Flight account maintained at Chase Bank, to the bank account of an automobile dealer in Illinois, which was in and affecting commerce and involving criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

In violation of Title 18, United States Code, Section 1957.

### **COUNT SEVEN**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraphs 1.q. and 1.r. of Count One are incorporated here.
2. On or about March 16, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON,

defendant herein, knowingly engaged in a monetary transaction, namely, the transfer of \$50,000 from a Top Flight account maintained at Chase Bank, to the bank account of a seller of jewelry and watches in New York, which was in and affecting commerce and involving criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

In violation of Title 18, United States Code, Section 1957.

### **COUNT EIGHT**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraphs 1.q. and 1.r. of Count One are incorporated here.
2. On or about March 25, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAMUEL W. JACKSON,

defendant herein, knowingly engaged in a monetary transaction, namely, the transfer of \$50,000 from a Top Flight account maintained at Chase Bank, to the bank account of a seller of jewelry and watches in New York, which was in and affecting commerce and involving criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

In violation of Title 18, United States Code, Section 1957.

### **FORFEITURE ALLEGATION**

The SPECIAL MAY 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this Indictment, defendants SAMUEL W. JACKSON, DAVID L. SULLIVAN II, and ELIZABETH E. CHERVINKO shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1957, as set forth in this Indictment, defendant SAMUEL W. JACKSON shall forfeit to the United States of America, any property involved in such offense, and any property traceable to such property, as provided in Title 18, United States Code, Section 982(a)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY