

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**FILED**  
July 2, 2020 11:05 AM  
CLERK OF COURT  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
BY: mkc SCANNED BY: TB 7/2/20

UNITED STATES OF AMERICA,

Plaintiff,

v.

WAVY CURTIS SHAIN,

Defendant.

**FELONY INFORMATION**

**1:20-cr-97**

**Janet T. Neff  
U.S. District Judge**

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The United States Attorney charges:

**Conspiracy to Commit Mail Fraud**

From on or about January 9, 2017 through on or about February 14, 2017, in the Southern Division of the Western District of Michigan and elsewhere, the defendant,

**WAVY CURTIS SHAIN,**

conspired with an individual, known to the United States Attorney and residing and acting in the Western District of Michigan ("Person A"), to devise a scheme and artifice to defraud and to obtain money from Merchant Capital Group, LLC (d/b/a Greenbox Capital) and The Fundworks, LLC by means of false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute the scheme and artifice, deposited and caused to be deposited false and fraudulent loan application documents to be sent or delivered by Federal Express, a private or commercial interstate carrier, in violation of Title 18, United States Code, Section 1341.

**Object of the Conspiracy**

The principal object of the conspiracy was to obtain money from Greenbox Capital and The Fundworks by means of false and fraudulent pretenses and representations in order to

unlawfully enrich Advanced Medical Services, P.L.L.C. (d/b/a Advanced Sleep Diagnostics of Michigan), a health care provider, owned and controlled by Person A, that had its principal place of business in the Western District of Michigan.

**18 U.S.C. § 1349**

**18 U.S.C. § 1341**

ANDREW BYERLY BIRGE  
United States Attorney

Date: July 1, 2020

  
ADAM B. TOWNSHEND  
Assistant U.S. Attorney