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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

UNITED STATES OF AMERICA, **V.** **ERICA MONTGOMERY,** **SANDRA ANDERSON,** **LEO FRANK THOMAS,** **YOLANDA BROWN THOMAS,** **KRISTINA PARKER,** and **DOROTHY WEBB,** **DEFENDANTS.**	**SEALED INDICTMENT** **Case No. 4:20-cr 32-CDL-MSH** **Violations:** Conspiracy, 18 U.S.C. § 371 Mail Fraud, 18 U.S.C. § 1341 Financial Aid Fraud, 20 U.S.C. § 1097 Money Laundering, 18 U.S.C. §§ 1956(a)(1)(A)(i) and 1956 (a)(1)(B)(i) Aiding and Abetting, 18 U.S.C. § 2 Forfeiture, 18 U.S.C. § 982 and 28 U.S.C. § 2461(c)

INDICTMENT

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

GENERAL ALLEGATIONS

A. Relevant Entities

1. Apex School of Theology. Apex School of Theology was a school based in Durham, North Carolina (hereinafter referred to as "Apex Main") with satellite learning centers in various other states that participated in Apex's educational programs via the Internet. Apex Main and its satellite learning centers offered various degrees in religious theology and practice including Associate's, Bachelor's, Master's, and PhD programs. The

learning centers also offered online classes and were locations where students could get on-campus teaching to supplement their online classes, and complete administrative duties such as orientation and paying fees. One such satellite Learning Center was Apex's Georgia/Alabama Learning Center, located in Columbus, Georgia (hereinafter "the Columbus Center"). This location serviced the Georgia, Alabama, and Florida region.

2. Populi, Inc.: Populi, Inc. was a software company which sold and maintained software of the same name. The software was used over the Internet with a web browser and could be accessed at any computer. Through the Populi software, Apex's Columbus Center accepted homework, administered tests, posted assignments, managed classes for student transcripts, maintained grade point averages ("GPA"), provided online chats, and otherwise tracked the student's academic progress. Each student had a username and password to access the software. Apex Columbus Center administrators had their own usernames and passwords to post assignments and grades. It was a violation of Populi's terms of service for one person to log in using another person's username and password. Populi kept all data on servers located in a centralized location. Prior to using the Populi software system, Apex Columbus Center used Blackboard, another web-based software to perform the same functions.

B. Defendants

1. **ERICA MONTGOMERY** was a resident of Columbus, Georgia and owned and managed Dylon Tax Service, a tax preparation service. She acted as a recruiter for the Apex Columbus Center.

2. **SANDRA ANDERSON** was a resident of Columbus, Georgia. She was the Director of Apex's Columbus Center.

3. **LEO FRANK THOMAS** was a resident of Columbus, Georgia. He was an instructor at Apex's Columbus Center. He was married to Defendant YOLANDA BROWN THOMAS.

4. **YOLANDA BROWN THOMAS** was a resident of Columbus, Georgia. She was an instructor at Apex's Columbus Center. She was married to Defendant LEO FRANK THOMAS.

5. **KRISTINA PARKER** was a resident of Phenix City, AL. She was an administrative assistant at the Apex Columbus Center.

6. **DOROTHY WEBB** was a resident of Columbus, Georgia, and Las Vegas, Nevada. She was an instructor at Apex's Columbus Center.

C. U.S. Department of Education Financial Aid Programs

7. The U.S. Department of Education ("DOE") oversees various federal programs that provide financial aid to students seeking enrollment in colleges, universities, and other schools of higher education. DOE regulations specify eligibility requirements as well as application, disbursement, and refund procedures for federal financial aid. To qualify for federal financial aid, the applicant was required to: (A) apply and be accepted to an educational institution, (B) enroll at least half time (6 hours) in a qualifying program at the approved institution, (C) possess a high school diploma or its

equivalent (such as a GED certificate), (D) be working toward a degree or certificate, and (E) maintain satisfactory academic progress once in school.

8. The regulations further require each school to have a satisfactory academic progress policy. If a student does not maintain satisfactory academic progress, they will become ineligible to receive federal financial aid. One of the mandated components of this policy is the achievement and maintenance of a certain grade point average.

9. One government financial aid program was commonly known as the "Pell Grant." The Pell Grant Program provided grants to eligible students in need of financial assistance to pursue post-secondary education at participating institutions. Pell Grant funds were awarded to students who had not yet earned a bachelor's or professional degree and did not have to be repaid by the student recipient. The Pell Grants were awarded on a yearly basis and ran from July 1 to June 30.

10. The Federal Direct Loan program ("FDLP") was another financial aid program also administered by DOE. Under FDLP, the federal government, as the lender, borrowed funds from the U.S. Treasury and disbursed the loan money to the school for the benefit of the student. Although DOE was the contracting party, it paid private contractors to handle most of the loan servicing tasks and collections on defaulted loans. The FDLP included Direct Subsidized Stafford Loans, Direct Unsubsidized Stafford Loans, Direct PLUS Loans, and Direct Consolidation Loans. Each applicant was required to sign and submit a Direct Loan Borrowing Agreement under penalty of perjury and certify that the

applicant will only use the loan proceeds for authorized educational expenses.

11. Before any federal financial aid could be awarded, the student applicant was required to submit to DOE a student aid application called the Free Application for Federal Student Aid ("FAFSA"). The FAFSA application was signed and submitted electronically. On the signature page, the student was required to certify that he/she is the applicant and that the federal aid funds would only be used to pay the cost of attending the institution. The FAFSA form also warned the applicant that purposely giving false or misleading information could subject the applicant to criminal penalties. Each FAFSA covered an academic year starting July 1 and ending June 30 of the following year. A new FAFSA was required for each new academic year and had to be signed by the Applicant.

12. Once the FAFSA was processed and the amount of financial aid was determined by Apex, or its third-party vendor, the school applied for disbursement of funds from DOE, which was done electronically. Once approved by DOE, the school was entitled to draw down the funds in stages through wire transfers to its bank account within an academic year. Both the Pell Grants and the FDLP program loans were funds governed by Title IV of the Higher Education Act of 1965 ("Title IV").

13. A school disbursed Title IV funds by crediting the student's account. If the total amount of all Title IV funds credited exceeded the amount of tuition and fees, room and board, and other authorized charges the school assessed the student, the school was required to pay the resulting credit balance (commonly in the form of a "refund check") directly to the student or parent as soon as possible, but no later than 14 days after the credit

balance occurs. Apex Main mailed these checks to the students' addresses as listed on the FAFSA or to another location if requested in writing by the student. These refund checks could only be used for educational purposes.

COUNT ONE
(18 U.S.C. § 371)
Conspiracy

14. From in or around August 2010 continuing until in or around May 2018, in the Middle District of Georgia and elsewhere,

ERICA MONTGOMERY,
SANDRA ANDERSON,
LEO FRANK THOMAS,
YOLANDA BROWN THOMAS,
KRISTINA PARKER, and
DOROTHY WEBB,

defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with one another and with persons known and unknown to the Grand Jury to commit the following offenses against the United States, to wit:

(a) mail fraud, that is, to knowingly and willfully devise and intend to devise a scheme an artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises and for the purpose of executing the scheme and artifice, and attempting to do so, did place and cause to be placed in the post office and an authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and did knowingly cause to be delivered by mail according to the directions thereon, a matter and thing, in

violation of Title 18, United States Code, Section 1341;

(b) financial aid fraud, that is, to knowingly and willfully obtain, cause others to obtain, attempt to obtain, and aid and abet others in obtaining and attempting to obtain, embezzle, misapply, steal, obtain by fraud, false statement, and forgery, and fail to refund any funds, assets, and property, funds in an amount exceeding $200, provided by the U.S. Department of Education under Title 20, Chapter 28, of the United States Code, in violation of Title 20, United States Code, Section 1097(a).

Purposes of the Conspiracy

15. The purposes of the conspiracy were to (1) falsify Apex applications, financial aid information, and course work including, but not limited to, the FAFSA, Apex application packets, grades, Blackboard and Populi entries, emails, and course work at the Apex Columbus Center in order to enroll new students and retain current students; (2) enable those students to fraudulently obtain federal financial aid; (3) fraudulently enrich the defendants and others; and (4) conceal the conspiracy.

Manner and Means of the Conspiracy

16. It was part of the conspiracy that the co-conspirators actively recruited fake students to enroll at the Columbus Center. MONTGOMERY told individuals that they could obtain "free" money without doing any schoolwork and without attending any classes. MONTGOMERY assured the prospective students that others would do the course work and all she needed was the student's personal identifying information

("PII") such as their social security number, date of birth, and address.

17. It was further part of the conspiracy that, in order to get fake students admitted to the Apex Columbus Center, ANDERSON, MONTGOMERY, and PARKER falsified the application packets to include false references and fictitious "spiritual autobiographies" to reflect that student's "spiritual journey" which were an integral part of the application. The students recruited by the defendants had no intention of taking classes at the Apex Columbus Center and were not interested in working to obtain a degree, as the defendants well knew.

18. It was part of the conspiracy that the co-conspirators falsified FAFSA applications and applied for and fraudulently obtained federal student loans and federal Pell Grants from DOE to attend the Apex Columbus Center.

19. It was part of the conspiracy that the co-conspirators falsified documents in support of these FAFSA applications. For example, the co-conspirators created false and fraudulent GEDs to satisfy the requirement of a high school diploma.

20. It was further part of the conspiracy that the co-conspirators created email accounts in student names, in order to impersonate students while communicating with Apex Main, and to defraud Apex Main and DOE.

21. It was further part of the conspiracy that the co-conspirators created Populi student usernames and passwords for the purpose of impersonating the students and posting work online. The co-conspirators logged onto Populi using the

student usernames and passwords to register the online presence of the student and to submit falsified homework, tests, and other course work as if they were the student, in order to deceive DOE and Apex Main and falsely show the student in good standing and eligible for additional federal financial aid. The co-conspirators often referred to this fraudulent behavior as completed under the name "Marsha."

22. It was further part of the conspiracy that the co-conspirators submitted and caused to be submitted false and fraudulent claims to DOE for financial aid.

23. It was further part of the conspiracy that, after DOE had sent federal funds to Apex Main, the co-conspirators impersonated students to ensure that federal financial aid funds were sent to them directly.

24. It was further part of the conspiracy that the co-conspirators kept portions of the federal financial aid money for their own benefit.

Overt Acts of the Conspiracy

In furtherance of the conspiracy, the defendants committed the following overt acts, in the Middle District of Georgia and elsewhere:

1. On or about August 29, 2011, SANDRA ANDERSON emailed Apex Main administrator H.D. to request that all student refund checks be sent to the Columbus Center.

2. On or about December 12, 2011, SANDRA ANDERSON emailed DOROTHY WEBB stating: "I will find the email for cookie's GED. It is bootleg but if it gets by…do it."

3. On or about March 13, 2013, YOLANDA BROWN THOMAS emailed SANDRA ANDERSON to submit coursework on behalf of students recruited by ERICA MONTGOMERY.

4. On or about April 28, 2013, YOLANDA BROWN THOMAS emailed student S.A. asking her to send the money for the completed midterm and final so that she could pay the THOMASES and others.

5. On or about December 3, 2013, LEO FRANK THOMAS emailed SANDRA ANDERSON, with copies of finals for 10 students saying they were for "Erica's people."

6. On or about March 11, 2014, SANDRA ANDERSON requested that LEO FRANK THOMAS complete Apex Columbus Center course work assignments for 15 students and post the work on Blackboard. THOMAS agreed replying "I'm on it."

7. On or about June 3, 2014, SANDRA ANDERSON emailed YOLANDA BROWN THOMAS and LEO FRANK THOMAS asking "tall" to log in after receiving notice that 111 students had not logged in to the Populi student discussion board.

8. On or about August 12, 2014, ERICA MONTGOMERY sent an email to KRISTINA PARKER and SANDRA ANDERSON containing the passwords for multiple students' email addresses. ANDERSON forwarded the email to YOLANDA BROWN THOMAS.

9. On or about August 14, 2014, ERICA MONTGOMERY emailed SANDRA ANDERSON and KRISTINA PARKER advising the correct email password for nine students.

10. On or about August 15, 2014, LEO THOMAS, emailed SANDRA ANDERSON advising that the passwords for 11 students "didn't work."

11. On September 8, 2014, KRISTINA PARKER, emailed ERICA MONTGOMERY, advising that "Doc [ANDERSON] is working on bios for those whose apps are complete."

12. On or about November 29, 2014, SANDRA ANDERSON emailed KRISTINA PARKER to add false biographical information to student applications.

13. On or about January 29, 2015, SANDRA ANDERSON instructed LEO FRANK THOMAS and YOLANDA BROWN THOMAS, to send emails to administrators of Apex Main in North Carolina by impersonating students to request Apex Main administrators to send federal financial aid refund checks to the Columbus Center and to make up a pretext to do so.

14. On or about January 29, 2015, SANDRA ANDERSON, in an email, instructed YOLANDA BROWN THOMAS and LEO FRANK THOMAS, to deceive Apex Main administrator H.D. by giving a false reason to send student D.F's refund check to the Columbus Center.

15. On or about June 16, 2015, KRISTINA PARKER emailed LEO FRANK THOMAS instructing him to impersonate students to send emails to Apex Main administrators.

16. On or about June 16, 2015, KRISTINA PARKER emailed LEO FRANK THOMAS to instruct him to take charge of making up emails and passwords for "Erica's new applicants."

17. On or about August 31, 2015, KRISTINA PARKER emailed LEO FRANK THOMAS instructing him to falsify student email addresses but make them look as close to the real one as possible in order to not look "suspicious. "

18. On or about September 2, 2015, DOROTHY WEBB emailed six students offering the answers to the midterm test stating: "I did not want to use the email address the school has set up for you for I don't want them to know what I have done."

19. On or about September 2, 2015, YOLANDA BROWN THOMAS emailed SANDRA ANDERSON to edit a false request by student C.C. to have his refund check sent to the Columbus, Georgia campus.

20. On or about September 9, 2015, KRISTINA PARKER, emailed SANDRA ANDERSON, with 14 names of "bios" to be done.

21. On or about October 29, 2015, DOROTHY WEBB emailed SANDRA ANDERSON admitting that students were submitting course work supplied by WEBB. WEBB stated: "Why should one be concern[ed] with where the work came from just as long as it is received?"

22. On or about November 3, 2015, YOLANDA BROWN THOMAS emailed DOROTHY WEBB discussing WEBB's work for students. THOMAS stated: "...you can still help the students that you are helping but just change up the papers and make them look different."

23. On or about March 9, 2016, DOROTHY WEBB emailed student T.R. stating: "Did you get your financial aid? That will determine if I should continue to do the work I put

together for you during the second and summer session. If they do not give you your financial aid, then there is no use to continue to do the work...."

24. On or about August 12, 2016, DOROTHY WEBB emailed student J.D. discussing plagiarized work stating: "If I am ever called on the carpet for that I will say I got it [plagiarized homework] from that individual. I am certain Doc [SANDRA ANDERSON] don't [sic] want to lose someone for plagiarizing when she going [sic] to lose student for not submitting their work. I will try to get into Derrick's classes."

25. On or about October 3, 2016, KRISTINA PARKER emailed LEO FRANK THOMAS, and others, instructing them to not give F's to students or they would not be paid.

26. On or about October 31, 2016, after sending the completed homework to student J.D., DOROTHY WEBB sent an email saying: "Just type the assignments as is and submit them, just make sure you type your name. I am the one reviewing the work. So, it's okay to say it to me word for word."

27. On or about March 31, 2017, DOROTHY WEBB emailed student W.I. stating: "I registered you for the fall 2017. Christmas will be coming up and I figured you can use the extra cash for that."

28. On or about August 15, 2017, YOLANDA BROWN THOMAS emailed DOROTHY WEBB coaching WEBB to use two different computers when submitting student work and as a teacher—then stated: "But I don't know any of this :) winking."

29. On or about October 18, 2017, KRISTINA PARKER emailed LEO FRANK THOMAS and others, instructing them to log on to Populi as if they were students to register the students' presence on-line to make it appear as if the students had participated in class.

All in violation of 18 U.S.C. § 371.

COUNTS TWO THROUGH SIX
(18 U.S.C. § 1341)
Mail Fraud

1. From in or around August 2010 continuing until in or around about May 2018, in the Middle District of Georgia, and elsewhere,

ERICA MONTGOMERY,
SANDRA ANDERSON,
LEO FRANK THOMAS,
YOLANDA BROWN THOMAS,
KRISTINA PARKER, and
DOROTHY WEBB,

defendants herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and with intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme, did cause to be placed in a post office and authorized deposit for mail matter a thing to be sent and delivered by the U.S. Postal Service and any private and commercial interstate carrier, in violation of Title 18, United Sates Code, Sections 1341 and 2.

The Scheme and Artifice

2. The Grand Jury realleges and incorporates by reference Paragraphs 16 through

24 of the Manner and Means section of this Indictment.

Purpose of the Scheme and Artifice

3. The Grand Jury realleges and incorporates by reference Paragraph 15 (Purposes of the Conspiracy) of this Indictment as a description of the purpose of the scheme.

Use of the Mails

4. On or about the dates specified as to each count below,

ERICA MONTGOMERY,
SANDRA ANDERSON,
LEO FRANK THOMAS,
YOLANDA BROWN THOMAS,
KRISTINA PARKER, and
DOROTHY WEBB,

defendants herein, in the Middle District of Georgia, and elsewhere, for the purpose of executing the scheme and artifice to defraud, and attempting to do so, did knowingly cause to be deposited a thing to be sent and delivered by the U.S. Postal Service according to the directions thereon the following matters:

Count	Date	of Mailing
2	3/29/2016	Apex Financial Aid Check to D.B. at 964 Tank Road, Box Springs, GA 31801 for $3,306.00 Description
3	2/9/2017	Apex Financial Aid Check to C.S. at 4711 11th Avenue, Columbus, GA. 31904 for $3,316.00
4	9/20/2016	Apex Financial Aid Check to D.R. at 2747 Hilyer Dr., Columbus, Ga. 31907 for $3,318.00
5	2/9/2017	Apex Financial Aid Check to Q.W. at 751 Parkhill Drive, Columbus, Ga 30907 for $3,316.00

6	2/7/2017	Apex Financial Aid Check to A.G. at 5200 Armour Rd. Apt. 5, Columbus, GA 31904 for $3,316.00

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS SEVEN THROUGH ELEVEN
(20 U.S.C. § 1097(a))
Financial Aid Fraud

1. From in or around August 2010 continuing until in or around about May 2018, in the Middle District of Georgia, and elsewhere,

ERICA MONTGOMERY,
SANDRA ANDERSON,
LEO FRANK THOMAS,
YOLANDA BROWN THOMAS,
KRISTINA PARKER, and
DOROTHY WEBB,

defendants herein, did knowingly and willfully, embezzle, misapply, steal, obtain by fraud, false statement, and forgery, and fail to refund any funds, assets, and property provided and insured under this subchapter and attempt to so embezzle, misapply, steal, obtain by fraud, false statement and forgery, and fail to refund any funds, assets, provided and insured under Title 20, Chapter 28, Subchapter IV of the United States Code, and Title 42, Chapter 34, Subchapter I, Part C, of the United States Code, in an amount exceeding $200, in that, the defendants applied for and abetted others in applying for and obtaining Pell grants and Federal Direct Program Loans in the amounts and on behalf of the students set forth below, when in fact, as the defendants well knew, the students had no intention of using those loan funds for educational purposes, as required.

Count	FAFSA Submission Date	Student	School year	Financial Aid Funds
7	8/5/16	D.R.	2016-2017	$ 11,796.00
8	8/10/16	Q.W	2016-2017	$ 11,796.00
9	7/6/16	C.S.	2016-2017	$ 11,796.00
10	4/4/17	C.S.	2017-2018	$ 11,796.00
11	7/6/16	A.G.	2016-2017	$ 11,796.00

All in violation of Title 20, United States Code, Section 1097(a) and Title 18, United States Code, Section 2.

COUNTS TWELVE THROUGH SIXTEEN
(18 U.S.C. § 1956(a)(1)(A)(i))
Money Laundering

1. On or about the dates below, in the Middle District of Georgia and elsewhere,

ERICA MONTGOMERY,

defendant herein, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, in that she caused the following federal financial aid checks in the following amounts payable to Apex Columbus Center students to be cashed, and a portion paid to her, which funds involved the proceeds of specified unlawful activities, that is, mail fraud, as set forth in this Indictment with the intent to promote the carrying on of the specified unlawful activity, and knowing that while conducting and attempting to conduct such financial transactions, the property involved in the financial transactions, that is funds in the amounts listed below, represented the proceeds of some form of unlawful activity:

Count	Date	Student	Amount
12	9/20/16	Q.W.	$3,318
13	2/9/17	Q.W.	$3,216
14	9/20/16	A.G.	$3,318
15	2/7/17	A.G.	$3,316
16	3/29/16	D.B	$3,306

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNTS SEVENTEEN THROUGH NINETEEN
(18 U.S.C. § 1956 (a)(1)(B)(i))
Money Laundering

1. On or about the dates below, in the Middle District of Georgia and elsewhere,

SANDRA ANDERSON,

defendant herein, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, in that she caused the following federal financial aid refund checks in the following amounts payable to Apex Columbus Center students to be deposited into a Community Outreach Church of Columbus account, which funds involved the proceeds of specified unlawful activities, that is, mail fraud, as set forth in this Indictment knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, and knowing that while conducting and attempting to conduct such financial

transactions, the property involved in the financial transactions, that is funds in the amounts listed below, represented the proceeds of some form of unlawful activity as follows:

Count	Check Date	Transaction Date	Financial Transaction
17	2/8/2017	2/21/2017	Deposit of Financial Aid Refund Check in the name of J.M. for the amount of $3,316.00 to Community Outreach Church of Columbus's Suntrust Account ending 2084.
18	11/23/2016	11/28/2016	Deposit of Financial Aid Refund Check in the name of J.M. for the amount of $3,318.00 to Community Outreach Church of Columbus's Suntrust Account ending 2084.
19	2/8/2016	2/16/2016	Deposit of Financial Aid Refund Check in the name of J.M. for the amount of $5,321.00 to Community Outreach Church of Columbus's Suntrust Account ending 2084.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

FORFEITURE ALLEGATION

The Grand Jury further alleges that:

1. Upon conviction of any violation of Title 18, United States Code, Sections 371, 1341, or 1956 as alleged in this Indictment,

ERICA MONTGOMERY,
SANDRA ANDERSON,
LEO FRANK THOMAS,
YOLANDA BROWN THOMAS,
KRISTINA PARKER, and
DOROTHY WEBB,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code,

Section 982(a)(2)(A) any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations.

2. If any of the property described above, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property that cannot be divided without difficulty,

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1. All pursuant to Title 18, United States Code, Section 982, Title 28, United States Code, Section 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PRESENTED BY:

CHARLES E. PEELER
United States Attorney
Middle District of Georgia

DAN S. KAHN
Acting Chief, Fraud Section
U.S. Department of Justice

DAVID A. BYBEE
Senior Litigation Counsel

CRAWFORD SEALS
Assistant U.S. Attorney

Filed in open court this 15 *day of* Oct *A.D. 2020*.

C. Alston
Deputy Clerk