

UNITED STATES DISTRICT COURT

for the
District of MinnesotaIN THE MATTER OF THE SEARCH OF THE
RESIDENCE DESCRIBED IN ATTACHMENT A-3

SEALED BY ORDER OF THE COURT

Case No. 23-mj-358 (ECW)

APPLICATION FOR A SEARCH WARRANT

I, Christine Kroells, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A-3, incorporated here

located in the State and District of Minnesota, there is now concealed:

See Attachment B, incorporated here

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code SectionOffense Description

Title 18, United States Code. Section 922(g)(1)

Felon in Possession of a Firearm

The application is based on these facts:

See Affidavit, incorporated here

☒ Continued on the attached sheet.

SUBSCRIBED and SWORN before me by reliable electronic means (FaceTime and email) pursuant to Fed. R. Crim. P. 41(d)(3)

Date: April 26, 2023

City and State: St. Paul, MN


Applicant's Signature

Christine Kroells, U.S. Postal Inspector
United States Postal Inspection Service


Judge's Signature

The Honorable Elizabeth Cowan Wright
United States Magistrate Judge

Printed Name and Title

STATE OF MINNESOTA)	FILED UNDER SEAL
)	AFFIDAVIT OF CHRISTINE KROELLS
COUNTY OF HENNEPIN)	Criminal No.: 23-mj-358 (ECW)

I, Christine Kroells, being duly sworn, depose and state as follows:

1. I am a Postal Inspector with the U.S. Postal Inspection Service and have been since 2003. I am currently assigned to the Twin Cities Field Office.

2. As a Postal Inspector my primary criminal investigative responsibilities include investigations that may involve violations of Title 18, United States Code, Section 1341 (mail fraud). I have conducted and participated in numerous criminal investigations of individuals involved in illegal activities for possible violations of the United States Code and related laws, including but not limited to mail and wire fraud in violation of Title 18, United States Code, Sections 1341 and 1343, respectively. My experience includes training in and investigation of mail fraud, wire fraud, and other related offenses, including money laundering.

3. This affidavit is submitted in support of an application for warrants to search:

a. The cell phones, iPad, and laptop seized from Tezzaree El-Amin Champion during the execution of a search warrant at offices located at 121 Washington Avenue N, Suite 311, 333B, and 324, Minneapolis, Minnesota 55401 (“Subject Premises 2”), as further described in Attachment A-2 (the “**Subject Devices**”); and

b. The single-family home located at 14790 Jay Street NW, Andover, Minnesota 55304, as further described in Attachment A-3 (“**Subject Premises 3**”) (collectively, the “**Subject Premises**”);

for evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Section 287 (false and fraudulent claims) 371 (conspiracy), 1341 (mail fraud), 1343 (wire fraud), 1956/1957 (money laundering), and 922(g) (felon in possession of a firearm).

4. As a Postal Inspector, I have participated in the execution of numerous search warrants for evidence, including documents, records, and proceeds from illegal activities. I have participated in the subsequent investigation and analysis of evidence seized pursuant to these warrants. Furthermore, in my training and experience, I have become familiar with the types of records individuals and businesses typically maintain in the course of their regular activities, including communications and business records.

5. This affidavit is based on my personal knowledge, interviews of witnesses, physical surveillance, information received from other law enforcement agents, my experience and training, and the experience of other agents. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of securing a search warrant for the premises located at the **Subject Premises**, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence, instrumentalities, and fruits of violations of

Title 18, United States Code, Sections 287 (false and fraudulent claims), 371 (conspiracy), 1341 (mail fraud), 1343 (wire fraud), 1956/1957 (money laundering), and 922(g) (felon in possession of a firearm) are located at the **Subject Premises**.

6. Based upon my work experience and training, as well as discussions with law enforcement agents, I know that:

a. Individuals work from home on an increased rate than prior to the COVID-19 pandemic and that this is especially so when they do not have a brick-and-mortar business front to work from. Individuals often maintain within their residence and vehicles records of personal and business assets and financial transactions, as well as physical evidence related to the fraud schemes. These items often include financial statements, receipts, invoices, bank statements and records, bank money orders and cashier's check receipts, property records, investment records, assets, stock and bond records, tax records, correspondence, diaries, and handwritten notes. These records are often maintained for extended periods of time, often several years.

b. Due to the increasing prevalence of electronic communications and storage, paper records can be easily converted and stored electronically. As a result, records and documents are often found in both paper and electronic format.

c. Nearly everyone has at least one cellular phone which can be used to access the Internet. As a result, all electronic devices contain different kinds of evidence as to the user's location, communications, and internet activity.

d. Individuals typically carry their cellular phone with them when they leave their residence. Individuals can use one cellular phone for both personal and business purposes or have multiple cellular phones, one for personal and one for business, for example. Individuals typically maintain these phones on or near their person and carry them with them from their residence to their workplace.

e. In order to accurately reconstruct personal or business financial history, all forms of personal and business records are required.

7. Based on my training and experience, I am aware that individuals maintain documentary evidence for long periods of time for several reasons. First, to an individual, the evidence may seem innocuous (e.g. financial, credit card and banking documents, travel documents, receipts, client lists, documents reflecting purchases of assets, personal calendars, telephone and address directories, checkbooks, photographs, utility records, ownership records, letters and notes, tax returns and financial records, escrow files, telephone bills, keys to safe deposit boxes, packaging materials, computer hardware and software). To law enforcement, however, such items often have significance and relevance when considered in light of other evidence. Second, the individual may no longer realize he/she still possesses the evidence. Third, the individual may believe law enforcement could not obtain a search warrant to seize the evidence. Fourth, the individual may operate under the belief that he/she has deleted, hidden, or further destroyed computer-related evidence, but in reality this evidence may be retrievable by a trained forensic computer expert.

I. OVERVIEW

8. This search warrant relates arises out of a Covid-19 fraud investigation. Tezzaree El-Amin Champion was the CEO of Futuristic Management Group LLC, a company that had a contract with Hennepin County to assist the county in providing outreach to underserved communities and businesses about the availability of CARES Act grants and other Covid-19 relief programs. Hennepin County paid El-Amin Champion's company for its outreach efforts. However, the county later received a number of suspicious loan and grant applications from business assisted by FMG and El-Amin Champion. Further investigation showed that El-Amin Champion and his company appear to have submitted fraudulent loan and grant applications on behalf of their clients in exchange for a portion of the fraudulent proceeds. The investigation further revealed that a large number of individuals related to or associated with El-Amin Champion and his company appear to have submitted fraudulent loan and grant applications during the Covid-19 pandemic.

9. On December 29, 2022, U.S. Magistrate Judge Elizabeth Cowan Wright signed a search warrant for the contents of 15 email accounts related to this case. Law enforcement agents, including myself, have begun to review these records.

II. LOCATIONS TO BE SEARCHED

A. Subject Premises 1

10. **Subject Premises 1** is a single-family home located at 715 Penn Avenue N. in Minneapolis. As explained below, the conspirators have used **Subject Premises 1** as the address for their businesses and/or as a residential address.

11. According to public records, **Subject Premises 1** is owned by Larcina D. Champion, grandmother of El-Amin Champion.

12. El-Amin Champion used **Subject Premises 1** as the address for businesses involved in the fraud scheme. For example, Minnesota Secretary of State records list **Subject Premises 1** as the registered office address for Champion Property Services LLC and the mailing address for Encouraging Leaders, another company involved in the scheme.

13. A number of other companies involved in the scheme listed **Subject Premises 1** as their business address on their applications for Paycheck Protection Program (“PPP”) loans, Economic Injury Disaster Loans (“EIDL”), and/or CARES Act grants, including Aqueelah Hair Braiding, Aqueelah TheCook Champion Catering, Bougie Bundles, Champion Property Services, Edlaine T Champion, Edlixis Champion, Larcina Champion, Miamore Boutique, Nona Beauty Bar and Nona Braiding, Sassy Savy LLC, and Taurus Bryant. Approximately 18 PPP and EIDL loan, and Hennepin County grant applications used **Subject Premises 1** as their business location.

14. According to U.S. Postal Service records, numerous businesses and individuals have received mail at **Subject Premises 1** as recently as February 2023. The businesses receiving mail at **Subject Premises 1** include Absolutely White LLC, Aqueelah Thacook Champion Catering LLC, Champion Property Services LLC, Construction Champion LLC, Encouraging Leaders, Jovial Stays LLC, and Sassy Savy LLC.

15. U.S. Postal Services records show that several individuals involved in the scheme receive mail at **Subject Premises 1**, including Tezzaree El-Amin Champion, Aqueelah Champion, Edlaina Champion, Edlixis Champion, Larcina Bryant, Larcina Champion, Nona Champion, Raheema Shabazz, and Taurus Bryant.

16. For example, on or about February 7, 2023, a mail piece addressed to The Fibi Network, LLC in Hopkins, Minnesota from Encouraging Leaders with the return address of **Subject Premises 1** was returned to sender, at **Subject Premises 1**, due to an insufficient address for the addressee. The outside of the envelope for the mail piece stated, "Important Tax Return Document Enclosed." On or about February 7, 2023, a mail piece addressed to the Business Owner of Jovial Stays LLC was in the process of being delivered to **Subject Premises 1**. On or about February 3, 2023, a mail piece was in the process of being delivered to Aqueelah Thacook Champion Catering, LLC at **Subject Premises 1**. On or about February 1, 2023, mail pieces from Encouraging Leaders with the return address of **Subject Premises 1** were in the process of being delivered to Nona Champion and El-Amin Champion at **Subject Premises 1**. The outside of these envelopes stated, "Important Tax Return Document Enclosed."

17. On or about March 7, 2023, law enforcement conducted surveillance at **Subject Premises 1**. The agent observed multiple vehicles parked near the front of the residence, including a vehicle registered to Aqueelah Champion.

B. Subject Premises 2

18. **Subject Premises 2** is a shared workspace located at 121 Washington Avenue N in Minneapolis.

19. El-Amin Champion uses this location as an office for at least one business involved in the fraud scheme, Encouraging Leaders. **Subject Premises 2** was also listed as the address for businesses involved in this fraud scheme when they applied for Hennepin County COVID-19 related grants and SBA PPP and EIDL loans. These businesses include, Futuristic Management Group, Champion Property Services, K. Johnson Enterprises, Me and My Sis-Stirs, and New Youth Programs. Approximately 12 PPP and EIDL loan, and Hennepin County grant applications used **Subject Location 2** as their location.

20. Law enforcement obtained records from Spaces, the business that rents out shared workspace located at **Subject Premises 2**. According to the records, Encouraging Leaders has rented space at **Subject Premises 2** since at least February of 2020. The rental records show Encouraging Leaders currently rents spaces at **Subject Premises 2** described as:

- a. 311, for the time period February 1, 2022 through January 31, 2024;
- b. 333B, for the time period May 25, 2022 through May 31, 2023, and
- c. 324, for the time period December 1, 2022 through November 30, 2023.

21. Previous rental records for Encouraging Leaders show that at times between February 2020 and May 2022, they also rented spaces identified as 305, 307, 316, and 325B. When I spoke with a representative of Regus, the parent company for Spaces, the employee explained that there is shared workspace available at **Subject Premises 2**, as well as individual locked cabinets and dedicated locked offices.

22. U.S. Postal Service records show that on or about December 30, 2022, El-Amin Champion changed his mailing address from **Subject Premises 1** to **Subject Premises 2**, specifically #333.

23. On or about April 6, 2023, surveillance was conducted at **Subject Premises 2**. I entered **Subject Premises 2** and requested a tour of the workspaces as a prospective rental customer. An employee provided me with a tour of the space, which included the 2nd, 3rd, and 4th floor at **Subject Premises 2**. The employee explained that there are shared desks available in a shared workspace as well as dedicated file cabinets and dedicated offices available for rent. Mail and phone services are available, as well as a parking space under the building for an additional monthly fee.

24. While touring the 3rd floor, I observed an interior dedicated office with two walls made of glass, one of which had the logo for Encouraging Leaders on it. From the hallway, I was able to see through the window walls and observed three individuals inside, one of which appeared to be El-Amin Champion. There were also desks and computer equipment in the office. Down a separate hallway, I observed another interior dedicated office with at least one window wall that had the

Encouraging Leaders logo on it. I was able to see two individuals inside the office. While later touring the 2nd floor, I observed a conference room that appeared to be available for renters to reserve and use as needed. “Reserved” was written on the white board outside the conference room, which had two walls of see-through glass. From the hallway, I was able to see into the conference room and observed El-Amin Champion sitting at the conference table across from an unknown male.

C. Subject Premises 3

25. **Subject Premises 3** is a single-family home located at 14790 Jay Street NW in Andover. **Subject Premises 3** is the home of Tazzaree El-Amin Champion.

26. According to online property records, **Subject Premises 3** is owned by a business, which appears to be unrelated to the fraud.

27. According to U.S. Postal Service records, El-Amin Champion was receiving mail at **Subject Premises 3** as recently as January 2023.

28. On April 4, 2023, surveillance was conducted at **Subject Premises 3**. At approximately 8:34 am, law enforcement observed a Mercedes SUV, Minnesota plates ELCHAMP (“Mercedes SUV”), running in the garage, and a Mercedes sedan, Minnesota plates CVA405 (“Mercedes sedan”), parked in the driveway. Both vehicles were registered to El-Amin Champion as of April 10, 2023. At approximately 8:35 am on April 4, law enforcement observed the Mercedes SUV leave **Subject Premises 3** and drive to and park in the area of **Subject Premises 2**. According to vehicle records the Mercedes SUV was registered to El-Amin Champion at **Subject Premises 1** and

the Mercedes sedan was registered to El-Amin Champion and Champion Property Services at **Subject Premises 2**.

29. On April 5, 2023, surveillance was conducted at **Subject Premises 3**. At approximately 8:25 am, law enforcement observed the Mercedes SUV running in the driveway of **Subject Premises 3** and then leave the residence. Law enforcement observed the Mercedes SUV drive to Minneapolis and park on Washington Avenue, directly in front of **Subject Premises 2**. Law enforcement observed a male, identified as El-Amin Champion, exit the vehicle and enter the front door of **Subject Premises 2**.

30. On April 12, 2023, surveillance was conducted at **Subject Premises 3**. Law enforcement observed two yard signs placed in the front yard of **Subject Premises 3**, one to the left of the driveway and one to the right of the driveway near the intersection. The signs appeared to be an advertisement for Champion Property Services and stated “Free Estimates” with the phone number (612) 486-2116. As explained below, Champion Property Services is one of the entities connected with the fraud scheme.

III. BACKGROUND OF THE CARES ACT AND OTHER COVID-19 RELIEF PROGRAMS

A. Overview of the CARES Act and Paycheck Protection Program

31. In March 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act, a federal statute designed to provide emergency financial assistance to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic. Among other things, the CARES Act

created the Paycheck Protection Program (“PPP”), a federal program implemented by the Small Business Administration (“SBA”) and designed to help certain businesses continue to pay their workers during the COVID-19 pandemic.

32. The PPP Program allowed small businesses to apply for low-interest private loans to pay for their payroll and certain other costs. The PPP loans were designed to provide small businesses with funds to pay up to 8 weeks of payroll costs including benefits. Funds could also be used to pay interest on mortgages, rent, and utilities. As part of the program, the loan could be partially or fully forgiven if the business kept its employee counts and employee wages stable.

33. To obtain a PPP loan, a qualifying business was required to submit a loan application, signed by an authorized representative of the business. In the PPP loan application (SBA Form 2483), the small business was required to state, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures were used to calculate the amount of money the small business was eligible to receive under the PPP program. Businesses applying for a PPP loan were also required to provide documentation showing their payroll expenses.

34. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. Among other things, the business had to certify whether the applicant or any individual owning 20 percent or more of the equity of the business was subject to an indictment, criminal information, arraignment, or other means by which formal criminal charges are brought.

Additional applicant certifications that each required the applicant's initials are excerpted below from the PPP loan application, which includes certifying that the applicant was in operation on February 15, 2020, and had employees for whom it paid salaries:

- The Applicant was in operation on February 15, 2020, has not permanently closed, and was either an eligible self-employed individual, independent contractor, or sole proprietorship with no employees, or had employees for whom it paid salaries and payroll taxes or paid independent contractors, as reported on Form(s) 1099-MISC.
- Current economic uncertainty makes this loan request necessary to support the ongoing operations of the Applicant.
- The funds will be used to retain workers and maintain payroll; or make payments for mortgage interest, rent, utilities, covered operations expenditures, covered property damage costs, covered supplier costs, and covered worker protection expenditures as specified under the Paycheck Protection Program Rules; I understand that if the funds are knowingly used for unauthorized purposes, the federal government may hold me legally liable, such as for charges of fraud...
- I further certify that the information provided in this application and the information provided in all supporting documents and forms is true and accurate in all material respects. I understand that knowingly making a false statement to obtain a guaranteed loan from SBA is punishable under the law...

35. Upon approval of a PPP loan application, the participating lender funded the PPP loan using its own monies, which were guaranteed by the SBA. Data from the application, including the information about the borrower, the total amount of the loan, and the listed number of employees, was transmitted by the lender to the SBA in the course of processing the loan.

36. The interest and principal on PPP loans was eligible for forgiveness if the business spent the loan proceeds on these expense items within a designated period of time and used a certain portion of the loan towards payroll expenses. PPP

loan forgiveness was generally based on what the loan proceeds were spent on, to what extent the business maintained or rehired its employees, and to what extent it maintained the wages and hours of its employees.

B. Economic Injury and Disaster (EIDL) Loans

37. During the COVID-19 pandemic, small business owners were also eligible to apply for COVID-19 Economic Injury Disaster Loans (“EIDL loans”). The EIDL loan program is an SBA program originally created to assist businesses, renters, and homeowners located in regions affected by declared disasters. The CARES Act expanded eligibility to allow small businesses impacted by the COVID-19 pandemic to apply for and receive EIDL loans.

38. EIDL loans were intended to provide eligible businesses with working capital to make regular payments for operating expenses, including payroll, rent/mortgage, utilities, and other ordinary business expenses, and to pay business debt. EIDL loan proceeds were to be used for working capital of an established business, not to start or expand a business.

39. EIDL loan eligibility was based on the applicant company’s gross revenue and cost of goods sold for the 12 months prior to January 31, 2020. Prior to April 6, 2021, companies were eligible to receive an EIDL loan in the amount of 6 months of gross profit (calculated as gross revenue minus cost of goods sold). For example, a company that had gross profit of \$100,000 in 2020 would be eligible to receive a \$50,000 EIDL loan.

40. After April 6, 2021, companies were eligible to receive EIDL loans to cover 24 months of gross profit (again, calculated as gross revenues minus cost of goods sold). Congress also increased the maximum EIDL loan amount from \$150,000 to \$500,000 per entity with a maximum \$2 million including affiliates. On September 8, 2021, the maximum EIDL loan amount increased to \$2 million but the disbursements for amounts over \$500,000 would not occur until after October 7, 2021.

41. EIDL loans were low interest loans for which payment was deferred for 24 months. Prior to April 6, 2021, no supporting documents were provided to the SBA in the initial application process. The SBA relied 100% on the applicant's submissions in the application.

42. After April 6, 2021, the SBA began requiring applicants to sign a Form 4506T that allowed the SBA to obtain the borrower's tax transcripts from the IRS. A signed Form 4506T was also required for the borrower to receive loan increases. Loans for more than \$500,000 required additional documentation, including repayment analysis and physical property collateral. In addition, for loans over \$500,000, the minimum credit score allowed was increased from 570 to 625.

C. Hennepin County Small Business Relief and Reopening Grants

43. During the COVID-19 pandemic, the Hennepin County Board of Commissioners created the Hennepin County Small Business Relief and Reopening ("SBRR") grant program, a small business relief grant program that used federal CARES Act money to fund and disburse grants to eligible businesses in Hennepin County.

44. According to the Hennepin County Economic Development website, between in or about May 2020 and March 2021, Hennepin County approved and issued approximately \$69.9 million in small business relief grants.¹ These grants were issued in five rounds of federally funded grants. A sixth round of grants was paid using state funds.

a. Round 1, known as “Small Business Relief” or “SBR” loans, launched in mid-May 2020 and authorized grants up to \$10,000 for eligible business with between 1 and 20 employees. The payments were sent out around May or June 2020.

b. Round 2 launched in late May or early June 2020 and authorized grants up to \$5,000 for self-employed entrepreneurs and sole proprietors, including home-based businesses. Payments went out around the summer of 2020.

c. Round 3, known as “Small Business Relief and Recovery” or (“SBRR”), launched the end of July 2020 through early August 2020 and authorized grants up to \$15,000 for businesses with between 1 and 50 employees. Payments started going out at the end of August and were paid through November 2020. Applicants who received funds during Round 1 were eligible for an additional \$5,000 in grant funds during Round 3.

d. The next round was technically an extension of Round 3. The County had been getting requests from businesses that missed the August deadline,

¹ Available at <https://www.hennepin.us/economic-development/impacts/success-stories/small-business-relief-fund> (last accessed on October 10, 2022).

and because the County did not know how much funding they had left to disburse they opened a waitlist for applications in mid to late October 2020. These payments went out in November through early December 2020.

e. Round 4, issued to Restaurants, Bars, Fitness, Entertainment Venues (“REG”), was launched in late November in response to the November 20, 2020, shut-down order. It authorized the issuance of grants up to \$15,000 for restaurants, bars, gyms, and entertainment/event venues. Round 4 funds started being paid out in or about mid-December 2020.

f. Round 5 authorized the issuance of grants up to \$15,000 for small businesses and nonprofits.

45. Hennepin County contracted with outside vendors to process loan and grant applications. One of the vendors that processed applications for Hennepin County was NextStage, a nonprofit business consulting firm that provides free business advising services to participating entrepreneurs and businesses in Carver County, Hennepin County, Scott County, and the City of Minneapolis. NextStage administered all applications for Round 3’s Small Business Relief and Recovery grants.

46. NextStage and other vendors received a list of loan/grant applications as well as a spreadsheet of application information. Upon receipt, NextStage contacted applicants requesting additional loan documentation. NextStage provided each loan applicant with a unique link to upload their documents to NextStage’s SharePoint site. NextStage employees then reviewed the documents submitted to

confirm that the loan applicant met all the program criteria and requirements. Once the application was approved, NextStage sent the applicant a link to sign the closing documents online via DocuSign. After the applicant signed the closing forms, the funds were directly deposited into the applicant company's bank account.

47. Each Small Business Relief and Recovery grant application required the applicant business' authorized signor to certify that:

I understand that if awarded, I will be subject to audit by the Fund Administrator and will be required to provide receipts and other evidence of the use of grant proceeds. In applying for financial assistance from the HC SBRR, I agree to comply with all federal, state, and local laws and regulations to the extent that such are applicable.

I certify that I am authorized to apply for this grant on behalf of the applicant business, and that the following are true:

- The applicant business was open and generating revenue as of January 15, 2020.
- The applicant business has a permanent physical location in Hennepin County that is physically separate from any owner's personal residence. I understand and acknowledge that the source of HC SBRR funding is the federal CARES Act and that any reimbursed by another CARES Act-funded program are an ineligible use of HC SBRR funds. Such programs including:
 - SBA Paycheck Protection Program (PPP) or EIDL Advance (Economic Injury Disaster Loan);
 - Minnesota Small Business Relief Grants;
 - Hennepin County Small Business Relief Funds (SBR, SEE),
 - Any city-sponsored small business forgivable loan or grant program utilizing CARES funding.

D. Hennepin County Navigators

48. Hennepin County entered into contracts with technical assistance providers, referred to as "Navigators," to assist the county in reaching out to the community to help those in need due to the economic side effects of the COVID-19 pandemic.

49. Navigators were responsible for raising community awareness of the availability of CARES Act grants and helping small businesses and individuals apply for the grant programs offered in Hennepin County. Navigators assisted applicant companies gather the necessary loan application documentation, including Secretary of State filings, commercial lease information, income tax forms, profit and loss statements, income statements, and bank account information. Navigators were also contracted to assist small businesses with technical aspects of their business, such as logo and website design and business writing, among others.

50. Each Navigator contract was for six months. In order to be selected as a Navigator, business owners had to send a proposal to Hennepin County containing details about their business, including contact information and key personnel. The applicants also provided a summary of their business, indicating which services they could provide, as well as other information used by Hennepin County to select the best Navigators for its communities.

E. Futuristic Management Group LLC

51. One of the businesses that had a contract with Hennepin County to serve as a Navigator was Futuristic Management Group LLC (“FMG”). According to Minnesota Secretary of State records, Tezzaree El-Amin Champion registered FMG on or about January 31, 2020. **Subject Premises 1** was listed as El-Amin Champion’s address on the incorporation paperwork. **Subject Premises 2** was listed as the company’s registered office and principal executive office address.

52. As explained below, the investigation has shown that FMG and its owners orchestrated and carried out a fraudulent scheme to obtain and misappropriate federal CARES Act funds by submitting fraudulent applications to Hennepin County for COVID-related grant funds. The owners of FMG then charged Hennepin County for its work obtaining these fraudulent grants and for other assistance provided to its purported clients, such as business writing, website, and logo design. In all, FMG received at least \$65,000 for its services as a Navigator.

53. According to its website, which no longer appears to be active, FMG is an advertising firm that offers social media and digital marketing services to small businesses, startups, and entrepreneurs. El-Amin Champion is the chief executive officer of FMG.

54. On or about October 15, 2020, FMG submitted a proposal to serve as a Navigator for Hennepin County. The proposal described FMG as “a well-established company managed by skilled and experienced talents within the digital marketing and advertisement niche.” The proposal explained that FMG has “served more than 300 customers and currently maintain a client base of 75 clients” and “worked with reputable organizations and brands that only hires the top cream and trusted digital marketing brand in the market.” The proposal further explained that the company “has been an asset in helping the businesses survive the harsh, unexpected economic surge that has been experienced during this period of Covid 19.” Among other things, the proposal said that FMG helped clients “devise lockdown strategy” and “embrace the consumer behavior shift because of Covid 19.” The proposal said that FMG had a

“history of social media and digital management with the City of Minneapolis Department of Public Works.” The cover letter for the proposal was electronically signed by Kyndall Johnson, who was identified in the proposal as the “Chief Operation[sic] Officer” of FMG. Cynthia Elmore was identified as the Chief Marketing Officer.

55. Hennepin County approved the proposal and, on or about November 4, 2020, entered into a contract with FMG (Contract No. PR0002784) to provide “Business Technical Assistance services to counteract the negative economic impacts of business interruption due to COVID-19 to Hennepin County business clients identified through the technology platform developed by Workbay, LLC with the working title ‘Elevate Business MN.’” Under the contract, Hennepin County would pay FMG \$100 an hour, up to a maximum of \$20,000, for these services. The contract ran from October 28 through December 20, 2020 and was funded through the CARES Act. El-Amin Champion electronically signed the contract on behalf of FMG. During the length of this contract, FMG submitted two invoices outlining the services they provided, one dated December 14, 2020 and one dated December 23, 2020. The first invoice reported FMG helped three clients for a total of 50 hours and charged Hennepin County \$5,000 for this work. The second invoice reported FMG helped six clients for a total of 150 hours and charged Hennepin County \$15,000 for this work, maxing out the amount FMG could submit to Hennepin County for payment.

56. In January 2021, FMG entered into a second contract with Hennepin County. This second contract ran from December 31, 2020, to March 31, 2021. The

contract provided that Hennepin County would pay FMG \$100 an hour to “provide Business Technical Assistance services to Hennepin County business and business owners to support their survival and recovery from the negative economic impacts [of] COVID-19.” The contract had a maximum value of \$10,000. On or about January 7, 2021, El-Amin Champion electronically signed the agreement for the contract as the owner of FMG. According to an invoice submitted for this contract, FMG helped seven clients for a total of 100 hours and charged Hennepin County \$10,000 for this work, again maxing out the amount they could obtain from Hennepin County.

57. The final agreement, electronically signed by Hamilton on or about April 26, 2021, allowed for FMG to be paid “\$100 per hour for contractual services actually performed” and a total cost to Hennepin County not to exceed \$35,000. Three invoices were submitted by FMG to Hennepin County for this contract, one dated June 22, 2021, the second dated June 30, 2021, and the third dated July 26, 2021. According to the first invoice, FMG helped clients for a total of 190 hours and charged Hennepin County \$19,000 for this work. According to the second invoice, FMG helped clients for a total of 90 hours and charged Hennepin County \$9,000 for this work. According to the third invoice, FMG helped clients for a total of 70 hours and charged Hennepin County \$7,000, making the total charged \$35,000 and again maxing out the total amount FMG could receive from Hennepin County per this agreement.

58. As part of the Navigator program, work samples for FMG were submitted to Hennepin County, including two brochures:

- a. Bringing Back the Village Sponsorship Proposal, and

b. FemTact Logistics (“FemTact”).

I reviewed these brochures and after doing some online research learned that several aspects of these brochures were taken from other sources.

59. For example, the FemTact brochure appears to be a marketing flyer for a purported business consulting services company called FemTact Logistics. According to online records, on or about September 3, 2020, FemTact was registered with the Minnesota Secretary of State. There was no registered agent listed but the registered office address was 2221 West Broadway Avenue N, Suite 105, Minneapolis, Minnesota. On or about February 3, 2022, the business was administratively terminated.

60. The address 2221 West Broadway also appears on the brochure submitted to Hennepin County. According to an online search this address is the location for El-Amin Fish House.

61. The other sections of the brochure explain the type of business FemTact is in and their services. But online searches for the language from the brochure revealed that much of the language was taken from various other websites. For example, the About section of the FemTact brochure states, that the company

...is committed to equipping micro, small and medium sized entities build a sustainable future through financial education, customized business training and advisory services. We design and deliver programs which ensure our clients have the skills and knowledge to better access financial services and promote social inclusion.

This language is almost word-for-word the same language that is from www.pattygabs.blogspot.com, which states,

PGabs Consultancy is committed to equipping micro, small, and medium-sized entities to build a sustainable future through financial education, customized micro-finance training, and advisory services...We design and deliver programs that ensure our clients have the skills and knowledge to better access financial services and promote social inclusion.

62. In contrast, the next sections on the FemTact brochure, Business Strategy and Enterprise Program Management, mimic word-for-word the language from another website, www.samsandersgroup.com:

Samsandersgroup.com

FemTact Logistics Brochure

<p>BUSINESS STRATEGY</p> <p>To guide your company toward its envisioned future, you need a road map. We will help you understand your business and customer insights while developing a compelling vision, strategy and overall blueprint for driving competitive advantage.</p> <p>ENTERPRISE PROGRAM MANAGEMENT</p> <p>How do you align program execution to strategy and accelerate value realization? From portfolio management to project delivery, we will work with you to deliver strategies and initiatives in an agile, rapid and value-driven manner.</p>	<p>BUSINESS STRATEGY</p> <p>To guide your company toward its envisioned future, you need a road map. We will help you understand your business and customer insights while developing a compelling vision, strategy and overall blueprint for driving competitive advantage.</p> <p>ENTERPRISE PROGRAM MANAGEMENT</p> <p>How do you align program execution to strategy and accelerate value realization? From portfolio management to project delivery, we will work with you to deliver strategies and initiatives in an agile, rapid and value-driven manner.</p>
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63. In addition, the sections People and Change and Operational and Process Excellence take almost the same language from the samsandersgroup.com website:

Samsandersgroup.com

FemTact Logistics



64. Another brochure submitted to Hennepin County as part of FMG's work samples was a brochure entitled 2021 Bringing Back The Village Sponsorship Proposal ("BBTV Proposal"). Page two of the BBTV Proposal is a sponsorship letter that after searching online I learned relied heavily on language from a sponsorship letter on the website www.sponsormyevent.com. For example, the BBTV Proposal states,

To ensure the success of Brining [sic] Back The Village, we are seeking partnerships, financial support and key stakeholder's involvement to support and promote us. We, therefore, take this opportunity to invite you to partner with us and be part of this rewarding initiative.

Whereas the letter on sponsormyevent.com stated,

To ensure the success of our initiative, we are seeking partnerships, financial support and key stakeholder involvement to support and promote this important and unique initiative. We, therefore, take this opportunity to invite you to partner with us and be part of this rewarding initiative.

In addition to several other typos where "bringing" is misspelled on the BBTV Proposal, there are other examples of almost word-for-word language from the

sponsormyevent.com letter being used for the BBTV Proposal. For example, the BBTV Proposal stated,

We are grateful that you have taken a few minutes of your time to look at our sponsorship opportunities enclosed and consider generously supporting this unique and vital initiative. We look forward to discussing partnership opportunities with your company and look forward to working with you to promote our efforts. Thank you in anticipation!

And the sponsormyevent.com letter stated,

We are grateful that you have taken a few minutes of your time to look at our sponsorship opportunities and consider generously supporting this unique initiative. We look forward to discussing partnership opportunities with your company and look forward to working with you to promote our efforts. We thank you in anticipation!

IV. THE FRAUD SCHEME

A. Reports of Potentially Fraudulent Applications Connected with FMG

65. This investigation arose out of multiple complaints about El-Amin Champion and his companies. In or about August 2021, an employee of NextStage notified Hennepin County that it had received 14 suspicious loan applications from businesses assisted by FMG.

66. In November 2021, Minneapolis Police Department (“MPD”) received a fraud complaint naming El-Amin Champion and Champion Property Services as subjects of the investigation. In or about December 2021, MPD learned of the parallel investigation being conducted by Hennepin County Fraud Unit. This case is a joint investigation with MPD, Minnesota Bureau of Criminal Apprehension, IRS-Criminal Investigation, and U.S. Postal Inspection Service.

67. Among other sources, employees of NextStage—the company with which Hennepin County contracted to process loan and grant applications—identified suspicious and potentially fraudulent applications. In or about August 2022, an IRS agent and Minneapolis Police Department Sargent interviewed an employee of NextStage (“Individual L.H.”). Individual L.H. explained that NextStage had reviewed approximately 20,000 applications for emergency funding. During this process, NextStage employees noticed some suspicious applications. For example, NextStage employees began seeing applications that had nearly identical impact statements and financial statements with similar formatting. Some of these applications were denied by NextStage. During the review process, Hennepin County informed NextStage that the similarities in the applications could be explained by the fact that some of the applicants may have had assistance in preparing their applications.

68. More specifically, during the November 2020 round, the application reviewer for NextStage noticed that some of the applications were suspicious. Among other things, NextStage noticed that these suspicious applications were submitted by businesses that had been registered with the Minnesota Secretary of State in late 2020, just prior to the application. NextStage noticed that many of the applications included internally created paystubs and nearly identical impact statements. In order to determine the applications were fraudulent, NextStage looked to see if the businesses had an online footprint and/or a physical location. In at least one case, NextStage asked an applicant to provide a lease because they were having trouble

identifying the address for the business. But NextStage was able to determine that the lease provided was fake because the owner of the building told them the building had not been rented for two years due to a fire. One of the applicants, whose application was similar to this one, later contacted NextStage to ask why her application had not been approved because she had a legitimate business and was really struggling. NextStage asked her if anyone had helped her with her application. She told them El-Amin Champion's business helped her.

69. Then in early 2021, NextStage was contacted by a woman whose husband ran one of the companies that applied for a grant—Chaos Boxing. The woman reached out to NextStage because she wanted to see copies of the documentation that was submitted for their application. This confused L.H., but after further communications with the husband and wife, L.H. learned that they had not submitted their own application. These applicants said that a provider, later identified as El-Amin Champion's company, said they could help and do everything for them and asked for their email login. According to the applicant, this provider also asked for \$5,000 from the grant proceeds and helped this client submit applications for PPP loans. In or about August 2021, L.H. contacted Hennepin County with what had happened.

B. Chaos Twin Cities Boxing Gym

70. In or about December 2021, Individual T.J. contacted NextStage to report that El-Amin Champion submitted a Hennepin County grant in his company's name, Chaos Twin Cities Boxing Gym ("Chaos Boxing").

71. According to online records with the Minnesota Secretary of State, “chaos twin cities boxing gym LLC” was registered with the state on or about June 9, 2020. The registered office address was listed as 5555 Zealand Ave N, Minneapolis, MN. Individual T.J. was reported to be the manager of Chaos Boxing. According to online Hennepin County property records, this is a residential apartment building.

72. Approximately two weeks after the business registration, on or about June 25, 2020, an SBA EIDL application was submitted in the name of Chaos Boxing. The application stated that the company began operations on February 2, 2019—more than six months before the company was registered with the Minnesota Secretary of State. The application further claimed – falsely – that Chaos Boxing had 9 employees as of January 31, 2020, and that the company had gross receipts/sales of approximately \$406,030 and reported the cost of goods sold as \$139,000.

73. As a result of the fraudulent application, Chaos Boxing was approved to receive a grant of \$9,000 and a loan for \$105,000.

74. Law enforcement obtained the records for the Chaos Boxing bank account at Wells Fargo Bank. The account was opened on or about June 11, 2020, two days after the business was registered with the Minnesota Secretary of State, with Individual T.J. as the sole signer on the account. According to the account application, Chaos Boxing was originally established on June 9, 2020, and the annual gross sales was reported as \$0.00 for the “Year Sales Reported” as June 9, 2020, which is in stark contrast with the numbers reported on the SBA EIDL application.

75. On or about June 30, 2020, the \$9,000 grant was deposited into Chaos Boxing's account at Wells Fargo. Prior to this deposit, the account had a balance of approximately \$225. Account records show that only two other deposits had been made into the Chaos Boxing account from the time it was opened until the SBA grant funds were deposited into the account—a initial \$100 cash deposit on June 11, 2020, and a \$200 cash deposit on June 15, 2020.

76. The next transaction after the SBA grant deposit of \$9,000, was a \$2,000 cash withdrawal on June 30, 2020. Following this deposit there was no further activity in the Chaos Boxing account until July 20, 2020, when the \$104,900 EIDL loan proceeds were deposited into the account.

77. Bank records show that the following day—July 21, 2020—\$78,000 was wired from the Chaos Boxing account to a Bank of America account in the name of Champion Property Services, one of El-Amin Champion's businesses. The wire notes described the transaction as an investment. According to Bank of America records, El-Amin Champion is the sole signatory on the account. [The account was initially funded with two payments totaling \$36,000 from Individual T.J. on June 26, 2020.] According to Bank of America records, on June 26, 2020, the customer with the access ID tchampion12, logged into the account and completed a mobile deposit from the IP address 50.237.67.70. The user tchampion12 again logged into the account on July 21, 2020, from the IP address 50.237.67.70. According to SBA records, this is the same IP address from which the fraudulent Chaos Boxing EIDL loan application was submitted on or about June 25, 2020.

78. Comcast records show that this IP address is used by Regus Management Group at **Subject Premises 2**.

79. Other fraudulent grant applications were submitted for Chaos Boxing in 2020. For example, on or about August 23, 2020, and November 23, 2020, applications were submitted to Hennepin County in the name of Chaos Boxing to obtain grants issued to SBRR and REG businesses. A 2019 IRS Form 1120 was submitted along with the November 2020 application. The Form 1120 claimed—falsely—that Chaos Boxing had gross sales of approximately \$300,813 in 2019.

80. Chaos Boxing also submitted payroll information, profit and loss statements, and a lease agreement as part of its grant application. Chaos Boxing submitted payroll registers for Chaos for January and February 2020 as a part of its grant application. The payroll registers purported to show that Maurice Tripp, Mylo Dashawn, and Individual T.J. were reported as Chaos employees for both months. The hourly wage for each employee was listed, including \$55 for Tripp, \$67 for Dashawn, and \$58 for Individual T.J.. According to Minnesota Department of Employment and Economic Development (“DEED”) data, Tripp, Dashawn, and Individual T.J. did not report working at Chaos Boxing in January and February 2020.

81. As a result of the applications, Chaos Boxing received \$25,000 in grants. The applications submitted to Hennepin County reported Chaos Boxing’s business address as 2507 Bryant.

82. The 2019 tax return submitted with Chaos Boxing's grant application stated that the business was located at 2507 Bryant. Chaos Boxing also submitted a lease agreement as part of its grant application. The lease agreement purported to document a commercial lease between Chaos Boxing and New Salem Inc. for the period January 13, 2019, through January 13, 2021. The lease was for 2,000 square feet of recreation space in the basement of "2707" Bryant Avenue N, Minneapolis, MN 55411, however the lease payments were to go to the landlord located at 2507 Bryant. The lease was allegedly signed by Chasma Dixon, the Personnel Director, using the DocuSign signature "Chazz Dixon."

83. This lease appears to be fraudulent. First, as explained above, Chaos Boxing does not appear to have existed in 2019. Second, Chasma Dixon did not work for New Salem Baptist Church in 2019 when the lease was purportedly signed. In or about March 2019, Chasma Dixon filed an application with Hennepin County to obtain public assistance through their food, cash, and emergency assistance programs. On her application that she reported that she had been employed with "Almavun" until March 31, 2019. On another application submitted in or about February 2020, Chasma Dixon reported that she worked for New Salem. On or about November 13, 2013, Dixon was sentenced to 21 months in prison following her conviction for participating in a conspiracy to prepare and submit false tax returns, in violation of 18 U.S.C. § 371. *United States v. Chasma Dixon*, 13 CR 16(2) (JNE/JJG).

84. Bank records show that the \$15,000 in Hennepin County grant funds were deposited into Chaos Boxing's account at Wells Fargo on or about September 23, 2020. The following day, \$5,000 in cash was withdrawn from the account.

85. On or about December 28, 2020, an additional \$10,000 in Hennepin County grant funds were deposited into the Chaos Boxing account. On or about January 4, 2021, \$2,000 in cash was withdrawn from the account.

86. In December 2020, FMG submitted two invoices to Hennepin County. The invoices billed Hennepin County for providing 40 hours of services to Chaos Boxing as a Navigator. On the invoices, FMG claimed they provided website services, graphic design, logo, business writing, and business consulting assistance to Chaos Boxing.

87. As described above, Individual T.J. contacted NextStage to report his application was submitted by FMG's owner, El-Amin Champion, and that Individual T.J. did not sign the tax form that had been submitted. Individual T.J. submitted documentation regarding this fraudulent submission, including emails. On or about December 11, 2021, Individual T.J. forward an email to L.H. at NextStage and stated, "I never sent this to you. Tezzy [El-Amin Champion] had to use a different computer with my email. I just seen this in my saved files." The email that Individual T.J. stated he never sent was dated September 8, 2020, purportedly from Individual T.J. and to L.H., with the subject "Budget for Chaos Twin Cities Boxing Gym LLC." According to the fake email, Individual T.J. stated he forgot to attach the budget for Chaos when signing the DocuSign agreement and attached it to this email. I reviewed

the Chaos budget document submitted and observed there were several expenses listed as eligible for reimbursement through the Hennepin County grant program, including rental expenses for March through August, suppliers/inventory for March through August, Marketing Services, and COVID-19 Training/Materials. According to this, Chaos was requesting reimbursement of \$15,000 of these expenses by the grant program.

88. On or about December 11, 2021, Individual T.J. forwarded another email to L.H. and stated, “This is not my signature.” This forwarded email was a chain of two emails starting on September 7, 2020, with an email from L.H. to Individual T.J.’ email address with the subject, “Completed: Please DocuSign: HC Grant Agreement (Please go over the budget and request for tax ID Carefully!!)” and then on September 8, 2020, this email was forwarded from Individual T.J.’ email address to El-Amin Champion at champspropertyservices@gmail.com.

89. On or about January 28, 2022, an investigator with the Hennepin County Fraud Investigation Unit interviewed Individual T.J.’ wife, Individual C.D. Individual C.D. explained she had been separated from Individual T.J. since March 2021 but lived with him prior to the separation. Individual C.D. explained Individual T.J. did not have a business and she did not know anything about a business until she found bank statements and grant documents regarding Chaos in her apartment. Individual C.D. stated that there was no boxing gym, and that Individual T.J. did not work. Individual C.D. explained she was aware Individual T.J. received about \$108,000 from PPP loans and he transferred \$78,000 of it to El-Amin Champion.

Individual C.D. stated that she was most upset about the fake payroll information she discovered with the grant applications for Chaos because the fake payroll documents listed her son, Maurice Tripp, and his friend, Milo Holmes, as employees of the business.

90. A review of the emails for Individual T.J.'s email account, i4aiq2c@gmail.com, showed that on or about September 7, 2020, Individual T.J.'s account received an email from Individual L.H. via DocuSign that the Hennepin County grant agreement document was signed. This email was forwarded on the following day to El-Amin Champion at champspropertyservices@gmail.com

91. According to IRS records, no tax returns, individual or employers, were ever filed for Chaos Boxing.

C. Minneapolis Police Received a Report that El-Amin Champion was Involved in a Fraudulent PPP Loan Scheme

92. On or about December 27, 2021, a Minneapolis Police officer interviewed Individual A.T. According to Individual A.T., he was introduced to El-Amin Champion and Marcus Hamilton in or about April 2021. Individual A.T. reported that El-Amin Champion and Hamilton represented themselves as investors and owners of FMG. Individual A.T. made an investment in a real estate deal with them to renovate a duplex in Minneapolis. Individual A.T. invested \$40,000 in the form of a cashier's check and also signed over the title of his pickup truck worth \$30,000. A.T. was promised a twenty (20) percent return on the profit of the property. Individual A.T. asked El-Amin Champion repeatedly over several months why work on the house was not progressing. Eventually, El-Amin Champion admitted to Individual A.T. that he

had used Individual A.T.'s investment to pay for another job without his permission. As a result, Individual A.T. filed a police report for theft.

93. In or about May or June 2021, El-Amin Champion asked if Individual A.T. would participate in a PPP loan scheme. According to Individual A.T., El-Amin Champion explained that Individual A.T. would only need to open a business bank account and that he would take care of the rest. El-Amin Champion said that Individual A.T. would receive 70 percent of the loan payout and that he would retain the remaining 30 percent. According to Individual A.T., El-Amin Champion showed him a large duffel bag full of cash that El-Amin Champion said contained \$100,000 in dirty money from the fraud scheme. Individual A.T. told law enforcement that he declined to participate because he did not think it was legal.

D. El-Amin Champion and Associates Submitted Fraudulent Loan and Grant Applications

1. FMG

94. On or about August 3, 2020, El-Amin Champion submitted or caused to be submitted a Hennepin County CARES SBR grant application for FMG. On or about November 16, 2020, El-Amin Champion electronically signed a grant agreement with Hennepin County for grant funds related to their Small Business Relief and Reopening program in the name of FMG. The grant agreement listed the address for FMG as **Subject Premises 2**.

95. Law enforcement obtained bank records for FMG from Wells Fargo Bank. According to the bank records, a bank account for FMG was opened by El-Amin Champion on or about January 31, 2020. On the account opening application, El-

Amin Champion was listed as the sole owner and signer on the account. The application also listed the number of employees as one, and for the “Year Sales Reported” of January 31, 2020, there was an annual gross sales amount of \$10,000. The business address was listed as **Subject Premises 2**. The account was opened with a cash deposit of \$5,000. On or about December 1, 2020, \$5000 from NextStage was deposited into the FMG bank account from the Hennepin County grant. The subsequent withdrawals from this account include payments for airline tickets, AirBNB, a restaurant in Las Vegas, and transfers to El-Amin Champion’s personal bank account and a FMG Wells Fargo card. One of the transfers to El-Amin Champion’s personal account occurred on or about December 3, 2020 for \$3,000. On that same date, there was a \$2,397.75 purchase from that account at Louis Vuitton. Immediately following the transfer to the FMG Wells Fargo card there was a purchase on the card for over \$3,000 at Sun Buggy Fun Rentals.

96. As of approximately June 6, 2022, Minnesota Department of Revenue (“MN-DOR”) could not find any records for FMG.

97. On or about June 22, 2020, an SBA EIDL application was submitted for FMG. According to the application, FMG’s address was listed as **Subject Premises 2** and El-Amin Champion was listed as the CEO for FMG. According to the application, the number of employees as of January 31, 2020, was five. The date listed for when the business began operations was January 8, 2016, and the gross receipts/sales was listed as \$255,073. As a result of this application, FMG was issued a \$5,000 grant and a loan of \$25,000.

98. In or about March 2021, El-Amin Champion submitted SBA PPP loan applications in the name of FMG. According to the application electronically signed by El-Amin Champion on or about March 15, 2021, the business primary address was listed as **Subject Premises 1**. According to the application electronically signed by El-Amin Champion on or about March 19, 2021, the business primary address was listed as **Subject Premises 2**. FMG received a PPP loan of \$17,376 which was later forgiven.

99. According to bank records, between December 2020 and August 2021, \$65,000 from Hennepin County was deposited into FMG's bank account for services as a Navigator, as described above. On or about June 24, 2020, the \$5,000 from the SBA EIDL loan was deposited into the FMG bank account at Wells Fargo. On or about July 7, 2020, the \$25,000 SBA EIDL loan was also deposited into the FMG bank account. Some of the subsequent withdrawals from the account include withdrawals from a branch store, transfers to pay a card linked to the account (\$4,650.77), a transfer to a personal El-Amin Champion account with the memo: quarterly payroll (\$11,559.27), and a payment to the IRS (\$3,776.28). A review of the account that received the transfer of \$11,559.27 for "quarterly payroll," showed payments to the IRS and then what appear to be primarily personal expenses, including payments to gas stations, restaurants, grocery stores, liquor stores, casinos, retail stores, Robinhood, and Mercedes Benz.

100. In addition, on or about May 7, 2021, the SBA PPP loan proceeds of \$17,376 were deposited into the FMG bank account at Wells Fargo. The subsequent

withdrawals from the account appear to be primarily personal in nature and included payments to Sun Country Airlines (\$1,371.40), rental cars, Hilton Nashville (\$819.83), Sonder (\$2,673.18), and RCI Minnesota (\$672.46). Also, on or about May 18, 2021, a \$10,000 check was made payable from the FMG account to Murschel Outdoor Services, with the memo “Bill.”

2. Champion Property Services LLC

101. According to online records, El-Amin Champion registered Champion Property Services LLC with the Minnesota Secretary of State on or about December 5, 2019. The registered office address was listed as **Subject Premises 1** and the principal executive office address and manager address were listed as **Subject Premises 2**. The manager was listed as “el champion enterprises llc.”

102. As part of the Navigator program, FMG billed Hennepin County for services provided to Champion Property Services. According to an invoice dated December 23, 2020, FMG reported they spent 20 hours for assistance with business writing. According to the FMG invoice, Clarence Champion, not El-Amin Champion, was the owner of Champion Property Services, which was located at **Subject Premises 1**. Clarence Champion is believed to be El-Amin Champion’s uncle.

103. On or about July 31, 2020, El-Amin Champion applied for a Hennepin County CARES grant on behalf of Champion Property Services. The application was for a CARES grant during round 3, which resulted in a \$15,000 grant. El-Amin Champion was the applicant for Champion Property Services, as well as the authorized representative. The business address for Champion Property Services on

the application was **Subject Premises 2**. A Form W-9 submitted in support of the application reported the business address at **Subject Premises 1**. El-Amin Champion electronically signed the Grant Agreement as the owner of Champion Property Services.

104. According to records from Bank of America, the Champion Property Services account was opened on or about June 25, 2020. El-Amin Champion was the sole signer on the account. On or about October 1, 2020, there was a \$15,000 ACH deposit from NextStage into the Champion Property Services account. At the end of October, there were three payments from the Champion Property Services account to a construction company, a title company with a memo line “2113 Ilion Ave N LSN 59321”, and an individual, D.K., with the memo “Deposit 2113 Ilion Ave N.” According to online property records, on or about November 23, 2020, a warranty deed was recorded transferring 2113 Ilion Ave N from D.K. to Champion Property Services.

105. On or about January 7, 2021, a second application for a Hennepin County SBR grant was submitted for Champion Property Services. The owner of the business was reported as El-Amin Champion and the business address was reported as **Subject Premises 2**. A Federal 2019 Schedule C, Profit or Loss from Business, for Champion Property Services, was submitted to NextStage. The Schedule C reported a net profit of \$62,594. Payroll registers for January and February were also submitted to NextStage. According to the payroll register for both January and February, there were three employees at Champion Property Services; Kyndall Johnson, Cynthia Elmore, and Aqueelah Champion.

106. On or about December 23, 2022, an email was sent to champspropertyservices@gmail.com, one of El-Amin Champion's email accounts, confirming the snow removal at **Subject Premises 3**. The email states, "Need my driveway plowed and walkway."

107. According to Minnesota Department of Revenue, Champion Property Services LLC began in 2005 and ceased in 2009 and did not have a tax filing history.

108. According to IRS records, Champion Property Services was reported on a Schedule C on a Form 1040 Individual tax return for the years 2019-2021.

3. Encouraging Leaders

109. According to online records, on January 9, 2020, "encouraging leaders" ("Encouraging Leaders") was registered as a nonprofit corporation with the Minnesota Secretary of State. El-Amin Champion was reported as the president. The mailing office for the company was listed as **Subject Premises 1** and the registered office address and president's address were listed as **Subject Premises 2**. As of February 6, 2023, the company was listed as active.

110. On or about January 6, 2021, El-Amin Champion applied to Hennepin County for a grant for another of his businesses, Encouraging Leaders, a "performing arts company," which, according to the grant application, was located at 2507 Bryant Avenue N, Minneapolis, Minnesota 55412 ("2507 Bryant")². According to the

² A church is located at 2507 Bryant.

application, the business was established in January 2019 and began generating revenue in December 2019.

111. Along with the application, a 2019 Form 990, Return of Organization Exempt From Income Tax, was submitted to NextStage. The Form 990 was electronically signed by El-Amin Champion on January 7, 2020, and marked as “final return/terminated.” The business address was listed as **Subject Premises 1**. According to line 12, total revenue was \$10,000. The section for the paid preparer name and information on the 2019 Form 990 was left blank. An online website that houses Form 990s for public inspection was researched for Encouraging Leaders. The search resulted in only one Form 990 for Encouraging Leaders, a Form 990EZ for the year 2020. According to the form, this return was the “initial return.” The business address was listed as **Subject Premises 1**. According to line 9, the total revenue was listed as \$74,610. The section for the paid preparer name and information on the 2020 Form 990EZ listed a paid preparer’s name and firm name. According to bank records for Encouraging Leaders, the total deposits into their account for 2020 was approximately \$74,609. Based on the above, it appears El-Amin Champion submitted a fraudulent tax return in support of an application for a CARES grant from Hennepin County, which was processed through NextStage.

112. Law enforcement obtained bank records for Encouraging Leaders from Citizens Independent Bank. According to the bank records, on January 9, 2020, El-Amin Champion and D.C. opened a business account for Encouraging Leaders at Citizens Independent Bank as Director and Assistant Director, respectively. The

address **Subject Premises 1** was listed as El-Amin Champion's address. I reviewed the transactions in this account from January 2020 through September 2022. Several individuals also received funds from this account, including John Stiffin (\$6,900), K. Johnson Enterprises (\$8,500), Larcina Champion (\$500), Lovely's Sewing & Arts (\$5,000), Me and My Sis Stirs (\$7,400), New Youth Programs (\$9,500), Nona Champion (\$4,947.88), Aikan Major (\$1,500), MeeK Stalling (\$26,790), and Raheeman Shabazz (\$6,500). In addition, regular wages also appear to have been paid through this account due to observed payments to ADP, a known third-party payroll services company. According to these bank records and the ADP records, between June 2020 and December 2022, El-Amin Champion received over \$150,000 and Kyndall Johnson received over \$50,000 from this account and between March 2021 and December 2022, Marcus Hamilton received over \$40,000 from this account.

113. According to the bank records, on or about March 10, 2021, a \$15,000 deposit from NextStage was made into the Encouraging Leaders account, most likely for the Hennepin County SBRR grant application from January 2021. Subsequent withdrawals from the account included checks to El-Amin Champion dated March 23, 2021 (\$14,853.05), Marcus Hamilton dated March 23, 2021 (\$3,498.70), and Me and My Sis Stirs dated April 1, 2021 and April 5, 2021 (\$2,200 and \$1,100).

114. On or about January 19, 2021, an SBA EIDL loan application was submitted in the name of "encouraging leaders," doing business as "Encouraging Leaders." According to the application, El-Amin Champion was listed as the manager for the business, which began operations on December 7, 2016. The business had

three employees as of January 31, 2020. The primary address was listed as **Subject Premises 2**, Suite 307 and the gross receipts/sales was listed as \$175,000. The loan was approved for \$80,000.

115. According to bank records for Encouraging Leaders, on or about February 16, 2021, \$79,900 for the EIDL loan was deposited into their account. In addition, between December 2020 and August 2022, Encouraging Leaders received over \$100,000 in deposits from Hennepin County. Other deposits into Encouraging Leaders' bank account included over \$234,000 from DOJ grants between December 2021 and September 2022; \$74,000 from "MN State-MMB" between January 2021 and August 2022; \$40,000 from CDC Foundation in June 2022.

116. Law enforcement obtained the records from the U.S. Department of Justice grant program for the over \$234,000 in deposits into the Encouraging Leaders bank account. According to these records, on or about June 28, 2021, El-Amin Champion applied for a grant for Encouraging Leaders from the Department of Justice. The proposed project title was Project HEALINGS (Health Education and Adolescent Learning Incorporating with Navigating Government Systems) and was projected to begin on October 1, 2021, and run through September 30, 2024, with a total of more than \$750,000 in estimated federal funding for the project. According to the grant records, Encouraging Leaders was categorized as a nonprofit with 501C3 status, and the award was through the Office of Juvenile Justice Delinquency Prevention and the Opioid Affected Youth Initiative.

117. According to the narrative proposal submitted as part of the application for the DOJ grant, Encouraging Leaders started substance prevention and intervention in 2015 with the Multi-Cultural Community Alliance coalition. This is inconsistent with the Minnesota Secretary of State records, which shows Encouraging Leaders was registered in January 2020. Both of these dates are inconsistent with other starting dates for Encouraging Leaders which were submitted as part of loan and grant applications. As described above, the Hennepin County grant application stated Encouraging Leaders started in January 2019, whereas the SBA EIDL loan application stated it started in January 2016.

118. According to the DOJ grant narrative proposal, Encouraging Leaders requested the funds as the lead agency in an initiative entitled “Project HEALINGS” in an effort to fight the opioid crisis. Through an online search, I found a website for Projects HEALINGS, projecthealings.info, which appears to mainly be about vaccination and information regarding COVID-19. According to the website, their vision is to provide:

...an opportunity to close vaccination gaps and solve persistent health inequities by galvanizing disparate regional efforts and forging unbreakable connections between BIPOC Minnesotans and the state, local, private, and nonprofit entities that serve them. More than 250,000 touches that will establish a formidable network of human relationships to fulfill current COVID priorities and lay a foundation for equitable management of major health events arising in the future. The initiative will focus on Minnesota’s major population centers and the tribal communities of the Anishinaabe and Dakota.

There is no mention of the fight against the opioid crisis, but the website does list several partners, including Encouraging Leaders. The narrative proposal for the DOJ

grant states that El-Amin Champion will be the lead of Project HEALINGS, but that is not corroborated by the website, although there is a section on the Project HEALINGS website which shows several short Public Service Announcement videos done by individuals discussing the importance of COVID-19 vaccination. El-Amin Champion is on one of these videos. According to the website,

Project HEALINGS is supported by the Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services (HHS) as part of an award totaling \$1 million with 20% percentage financed with non-governmental sources.

The website also states,

This project is supported in part by the Centers for Disease Control (CDC) and Prevention of the U.S. Department of Health and Human Services (HHS) through NNPHI.


119. I was unable to find information about the DOJ grant to Encouraging Leaders on the Project HEALINGS website.

120. The narrative proposal lists El-Amin Champion as the Program Director, Marcus Hamilton as the Project Coordinator, and Kyndall Johnson as the Multimedia Technology Coordinator. The narrative also states that, as the lead agency, Encouraging Leaders designed a centralized computer database server to maintain the records and monitor the sub-awardees.

121. As part of the application for the DOJ grant, a Memorandum of Understanding was submitted with several letters of support, all of which but one, are addressed to the U.S. Department of Justice, Office of Justice Programs. There are seven letters of support in all. These letters appear suspicious due to similarities in the language of the letters and inconsistencies in what is left off the letters. For

example, all of the letters begin with the term “Greetings” and then state that this is either a support or a commitment letter for a joint project. The letters all end by stating, “Your favorable consideration would be much appreciated.”

122. Another unusual aspect of these letters is that most of them do not contain contact information for the writer or organization they represent, and sometimes when there is contact information, it is either unusual or inconsistent with other sources for this information. For example, one of the letters purports to be from the Founder of Crossroads Panorama, a Minnesota non-profit helping children through the arts, but the contact information in the signature block of the letter is crossroadspanorama@live.com and www.crossroadspanoarma@live.com. The website listed in the letter appears to have a couple of typos, in the spelling of the word panorama and in the web extension, because from a Google search I was able to learn that the actual website address is www.crossroadspanorama.com. According to the Crossroads Panorama website, their email address is crossroadspanorama@gmail.com, and not what was listed on the support letter. Only two of the letters contain phone numbers, but online searches showed these numbers are likely connected to those organizations, although one of the phone numbers, for an organization called Nursing Is The Answer, is formatted in an odd way:



763-2200617

123. Encouraging Leaders has a website at encouragingleadersmn.org. As of March 2023, I reviewed this website. One of the top selections on the website is

entitled “Focus Areas.” It includes sections on Equitable Health Care, Economic Mobility And Opportunity, K-12 Education, Violence Prevention, and Civic Education. Much of the language from these sections appears to have been taken from other websites, including from well-known charitable organizations like the YWCA and the Gates Foundation. For example, under Equitable Health Care the Encouraging Leaders website states:

Encouraging Leaders aims to reduce inequities in health...by developing new tools and strategies to reduce the burden of infectious diseases...

Similarly, the Global Health section of the GatesFoundation.org website states:

Our Global Health Division aims to reduce inequities in health by developing new tools and strategies to reduce the burden of infectious disease...

According to the Encouraging Leaders website,

EL has championed HIV prevention to accelerate the decline in HIV infection...and save lives by ensuring expanded and simplified HIV treatment and improved and effective interventions to prevent new infections.

According to GatesFoundation.org, under a section about their goal regarding HIV, their website states,

To accelerate the decline in HIV infection worldwide and save lives by ensuring expanded and simplified HIV treatment and improved and effective use of interventions to prevent new infections.

GatesFoundation.org:

Global Health

Our Global Health Division aims to reduce inequities in health by developing new tools and strategies to reduce the burden of infectious disease and the leading causes of child mortality in developing countries.

HIV

Our goal

To accelerate the decline in HIV infection worldwide and save lives by ensuring expanded and simplified HIV treatment and improved and effective use of interventions to prevent new infections.

Encouragingleadersmn.org:

Equitable Health Care

Encouraging Leaders aims to reduce inequities in health among the BIPOC communities in Minneapolis by developing new tools and strategies to reduce the burden of infectious diseases such as HIV, AIDS, and HEPATITIS, among others. EL has championed HIV prevention to accelerate the decline in HIV infection in the poorest Neighborhoods in Minneapolis and save lives by ensuring expanded and simplified HIV treatment and improved and effective interventions to prevent new infections. Our current and past programs have focused on culturally competent approaches to spreading HIV education awareness and liaising with health providers to offer patient-centered services.

124. The Economic Mobility and Opportunity section of the Encouraging Leader website also mimics the Economic mobility and opportunity section of the Gates Foundation website. According to encouragingleadersmn.org,

Our goal is to dramatically increase economic mobility and opportunity... Our conversations in BIPOC communities inform our understanding of the scope and scale of the challenge and the nature of the barriers involved, including systemic racism, neighborhood structures, the criminal justice system, and access to affordable housing and career pathways.

But according to GatesFoundation.org,

Our U.S. Economic Mobility and Opportunity strategy seeks to ensure...to dramatically increase economic mobility and opportunity.

The GatesFoundation.org website later states,

These conversations have given us a deeper understanding of the scope and scale of the challenge and the nature of the barriers involved, including systemic racism, neighborhood structures, the criminal justice system, and access to affordable housing and career pathways.

125. According to the K-12 Education section of the Encouraging Leaders website,

Our goal is to significantly increase the number of...students experiencing poverty who graduate from high school, enroll in a postsecondary institution, and are on track in their first year to obtain a credential with labor-market value.

But according to the Gates Foundation website under the section K-12 education,

Our goal is to significantly increase the number of...students experiencing poverty who earn a diploma, enroll in a postsecondary institution, and are on track in their first year to obtain a credential with labor-market value.

126. Another website that the Encouraging Leaders website mimics is the YWCA.org. According to the Encouraging Leaders website Violence Prevention section,

EL provides safe and secure housing, crisis hotlines, counseling, court assistance, and other community and safety programs to more than 500 women, children and families...

But according to the YWCA website section Domestic and Sexual Violence Services section,

...YWCA...providing safe and secure housing, crisis hotlines, counseling, court assistance, and other community and safety programs to more than 535,000 women, children, and families.

127. Under the Encouraging Leaders section for Violence Prevention, there are sections for Housing, Crisis Hotlines, and Counseling as well. This again copies the YWCA website, which also has these sections under their Domestic and Sexual Violence Services section. The Encouraging Leaders website states,

Housing: creating a safer, more just world by offering safe and secure emergency shelter, transitional housing, and long-term housing to victims and survivors of gender-based violence so they can avoid homelessness and rebuild their lives.

But the YWCA website Housing section states exactly the same message,

YWCA is creating a safer, more just world by offering safe and secure emergency shelter, transitional housing, and long-term housing to victims and survivors of gender-based violence so they can avoid homelessness and rebuild their lives.

128. The Encouraging Leaders website section for Crisis Hotlines mimics nearly word-for-word the YMCA section for Crisis Hotlines. Encouragingleadersmn.org states,

EL's crisis hotlines and chat lines are vital resources for survivors of sexual and domestic violence. They aid through crisis intervention and support by helping to identify problems, priorities, options, and possible solutions, including helping to make plans for safety and action; information about resources on healthy relationships, domestic violence, and sexual assault; and referrals to other BIPOC domestic violence shelters and programs, social service agencies, legal assistance agencies, and other relevant services.

The YWCA.org website states,

YWCA crisis hotlines and chat lines are vital resources for survivors of sexual and domestic violence. They provide assistance through crisis intervention and support by helping to identify problems, priorities, options, and possible solutions, including helping to make plans for safety and action; information about resources on healthy relationships, domestic violence, and sexual assault; and referrals to domestic violence shelters and programs, social service agencies, legal assistance agencies, and other relevant services.

When I reviewed the Encouraging Leaders website, I did not find a Crisis Hotline number.

129. Again, the Counseling section of the Encouraging Leaders website mimics the Counseling section of the YWCA website. Encouragingleadersmn.org states,

EL provides Counseling services to help survivors to address the traumatic impact that violence has had on their families, as well as to secure long-term therapeutic interventions. EL offers adult and child counseling, helping break the cycle of violence through providing trauma-informed services.

But the YWCA.org states basically the same thing,

Counseling helps survivors to address the traumatic impact that violence has had on their families, as well as to secure long-term therapeutic interventions. YWCAs around the country offer adult and child counseling, helping to break the cycle of violence through the provision of trauma-informed services.

YWCA.org:

We are the largest network of domestic and sexual violence service providers in the nation. More than 150 YWCAs across 44 states provide gender-based violence services. Every year, in communities big and small, YWCAs get up and do the work of providing safe and secure housing, crisis hotlines, counseling, court assistance, and other community and safety programs to more than 535,000 women, children and families.

Housing

YWCA is creating a safer, more just world by offering safe and secure emergency shelter, transitional housing, and long-term housing to victims and survivors of gender-based violence so they can avoid homelessness and rebuild their lives. In many communities, YWCA is the only provider of housing for domestic violence survivors. The fact that 1 in 4 women is homeless because of violence committed against her, and more than 92% of homeless mothers have experienced severe physical and/or sexual abuse during their lifetime makes YWCAs services even more crucial.

Crisis Hotlines

YWCA crisis hotlines and chat lines are vital resources for survivors of sexual and domestic violence. They provide assistance through crisis intervention and support by helping to identify problems, priorities, options, and possible solutions, including helping to make plans for safety and action; information about resources on healthy relationships, domestic violence, and sexual assault; and referrals to domestic violence shelters and programs, social service agencies, legal assistance agencies, and other relevant services.

Counseling

Counseling helps survivors to address the traumatic impact that violence has had on their families, as well as to secure long-term therapeutic interventions. YWCAs around the country offer adult and child counseling, helping to break the cycle of violence through the provision of trauma-informed services.

Encouragingleadersmn.org:



Violence Prevention

Encouraging Leaders spearheads domestic and sexual violence services. EL provides safe and secure housing, crisis hotlines, counseling, court assistance, and other community and safety programs to more than 500 women, children and families across Minnesota. Some of the critical services that we provide include:

Housing: creating a safer, more just world by offering safe and secure emergency shelter, transitional housing, and long-term housing to victims and survivors of gender-based violence so they can avoid homelessness and rebuild their lives.

Crisis Hotlines: EL's crisis hotlines and chat lines are vital resources for survivors of sexual and domestic violence. They aid through crisis intervention and support by helping to identify problems, priorities, options, and possible solutions, including helping to make plans for safety and action; information about resources on healthy relationships, domestic violence, and sexual assault; and referrals to other BIPOC domestic violence shelters and programs, social service agencies, legal assistance agencies, and other relevant services.

Counseling: EL provides Counseling services to help survivors to address the traumatic impact that violence has had on their families, as well as to secure long-term therapeutic interventions. EL offers adult and child counseling, helping break the cycle of violence through providing trauma-informed services.

130. According to IRS records, Encouraging Leaders did not start filing Forms 941, Employers Quarterly Federal Tax Returns, with the IRS until the fourth quarter of 2020.

E. Kyndall Johnson and Boozin LLC and K. Johnson Enterprises

131. As described above, Kyndall Johnson has held roles in at least two of El-Amin Champion's companies, including as the "Chief Operation[sic] Officer" of FMG and as the MultiMedia Technology Coordination for Encouraging Leaders. In addition, Kyndall was reported a Hennepin County SBR application as an employee of Champion Property Services, another El-Amin Champion entity. As described

below, one of Kyndall's companies, Boozin' LLC, was also listed in a Hennepin County Navigator program invoice as having received services from FMG and another of Kyndall's companies, K. Johnson Enterprises, allegedly shared an address, **Subject Premises 2**, with El-Amin's company, Encouraging Leaders.

132. According to Minnesota Secretary of State records, Boozin' LLC was registered on or about April 9, 2021. Kyndall B. Johnson was the registered agent. The registered office address was reported as 1801 3rd Avenue N, Minneapolis, Minnesota.

133. According to an invoice dated July 26, 2021, FMG billed Hennepin County for services provided to Boozin' LLC. The owner of the business was listed as Kyndall Johnson. The invoice stated FMG assisted Boozin' with its logo, social media marketing, and business set up for a total of ten hours of work. As stated above, Kyndall signed the October 2020 contract that FMG entered into with Hennepin County.

134. According to Minnesota Secretary of State records, an entity called K. Johnson Enterprises LLC was registered on or about July 15, 2020. Kyndall Johnson was listed as the company's manager. **Subject Premises 2** is listed as the address of the company's principal executive office. As stated earlier, **Subject Premises 2** is also the address for El-Amin Champion's company, Encouraging Leaders.

135. Approximately two weeks later – on or about August 5, 2020, Kyndall opened an account on behalf of K. Johnson Enterprises at Bank of America. Kyndall was the sole signatory on the account. Records obtained from Bank of America show

that following an initial deposit of \$25, there was minimal activity in the account for the remainder of 2020.

136. On or about October 13, 2020, an email was sent from El-Amin Champion's FMG email account, entertainmentsuccessful@gmail.com, to Kyndall's email account, kyndallbjohnson@gmail.com, with a link to a Google document. The subject line stated, "Apply but you have to use a Brooklyn Center address . we will create a lease." The following day there was a Google Forms email to Kyndall regarding K. Johnson Enterprises' grant application through the city of Brooklyn Center. The application showed the business location as Brooklyn Center, not as **Subject Premises 2**, as listed above in the Minnesota Secretary of State records or below in the ACER grant.

137. I found an email chain dated December 4, 2020, between Kyndall and an employee of ACER Inc., which stands for African Career, Education, and Resources and is a business based in Brooklyn Park, Minnesota. According to the emails, Kyndall applied for a Small Business Relief Grant through ACER and the ACER employee directed Kyndall to fill out a questionnaire as part of the application. In response to the ACER employee's email, Kyndall identified himself as "Kyndall with K. Johnson Enterprises" and explained he was waiting for his landlord to send his lease agreement so that Kyndall could send the agreement to ACER for his grant application.

138. In an email dated December 9, 2020, Kyndall again responded to the ACER employee and stated that he submitted his application and the questionnaire

and included a copy of his lease agreement. The document attached to this email appears to be a lease agreement between K. Johnson Enterprises and Spaces at **Subject Premises 2**. According to the records obtained from Regus, as described above, K. Johnson Enterprises did not rent workspace at Spaces. This lease agreement also appears to have been digitally copied and pasted by the confirmation number and total monthly price:

Office Agreement	
Agreement Date : January 28, 2020	Confirmation No 10860084
Business Center Details MN, Minneapolis - Spaces North Loop Address 121 Washington Ave. N	Client Details Company Name K. Johnson Enterprises LLC

and

Total Average Monthly Price per Person per Month		\$1024		
Total Monthly Price		\$1024.00		
Service Provision :	Start Date	February 1, 2020	End Date	January 31, 2021

139. I looked through additional email accounts from the search warrant, including kjoh1502@gmail.com, another email address belonging to Kyndall. I found an email dated December 4, 2020, from El-Amin Champion to kjoh1502@gmail.com with the subject line “Ramsey County Plus review attachment.” Attached to the email was a lease agreement that looked similar to the one attached to the December 9, 2020 email from Kyndall to ACER, except this lease agreement was between Spaces at **Subject Premises 2** and El-Amin Champion for FMG. According to the two lease

agreements, K. Johnson Enterprises rented office 307A and FMG rented the office 307, both for the time period February 1, 2020 through January 31, 2021. According to the records from Regus, Encouraging Leaders rented office 307 for that time period and office 307A is not on the list of rented spaces.

140. In or about 2021, applications were submitted for PPP and EIDL loans in the name of K. Johnson Enterprises LLC. Two PPP applications resulted in two loans, one for \$46,735 and one for \$46,875.

141. On or about November 24, 2020, an application was submitted to Hennepin County for CARES SBRR grant funding for K. Johnson Enterprises. A Form 1040 Schedule C, Profit or Loss from Business, submitted in support of the application listed an address of **Subject Premises 2**. The accompanying payroll register identified Kayla Johnson and Jamal Sargent as the employees of K. Johnson Enterprises.

142. Based on this fraudulent application, Hennepin County issued a \$15,000 grant to K. Johnson Enterprises.

143. The grant proceeds were deposited into K. Johnson Enterprises account at Bank of America on or about February 23, 2021, and a PPP loan of \$46,735 for K. Johnson Enterprises was deposited on February 26, 2021. The K. Johnson Enterprises account also had several deposits in February 2021 that were identified as "STATE OF INDIANA DES: UI PAYMENT." These deposits appeared to be unemployment benefits issued to Kyndall by the state of Indiana.

144. Between February 23 and March 1, 2021, a total of \$29,500 in cash was withdrawn from the K. Johnson Enterprises account. There were also payments to a real estate rental management company, as well as payments to companies that provide securities trading (Robinhood Funds and Plutus Financial).

145. On or about June 14, 2021, the K. Johnson Enterprises account received another \$46,875 in PPP loan proceeds.

146. According to IRS records, K. Johnson Enterprises was first reported as a Schedule C business on an individual tax return, Form 1040, for the tax year 2020. Returns were also filed for tax years 2021 and 2020. No employment tax returns were filed for K. Johnson Enterprises.

F. Fraudulent Loan and Grant Applications from Other Companies Purported Located at Subject Premises 1 and 2

1. Raheema Shabazz and Absolutely White LLC

147. As described below, Raheema Shabazz has claimed **Subject Premises 1** as her residence and the location of her business, Absolutely White, LLC. As described above, El-Amin Champion previously lived at this residence and some of his relatives still live there. This location was also used on approximately 18 PPP and EIDL loan and Hennepin County grant applications.

148. According to online records, on or about September 9, 2020, “Absolutely white LLC” (“Absolutely White”) was registered with the Minnesota Secretary of State. “Raheeman” Shabazz (“Shabazz”) was reported as the manager for Absolutely White. The registered office address, principal executive office address, manager

address, and mailing address for the business was **Subject Premises 1**, which was the same address on Shabazz's driver's license.

149. On or about July 7, 2020, an application for SBA EIDL funds was submitted for a business, "Raheema Shabazz." According to the application, the business, Raheema Shabazz, was established on October 3, 2018. Two addresses for the business were listed on the application, **Subject Premises 1** and 1041 James Avenue, Minneapolis, Minnesota. According to the application, the business opened on October 4, 2018, was in the business services industry, and had 10 employees. The application claimed that the company had \$70,000 in gross revenues in 2019.

150. The application was approved for a \$10,000 EIDL loan advance, which was funded in July 2020. The application was also approved for a supplemental targeted advance of \$5,000, which was funded in July 2021.

151. According to records from Wells Fargo Bank, on or about July 10, 2020, a \$10,000 deposit from the SBA was received into Shabazz's bank account. Prior to this deposit, the account was overdrawn and had a negative balance. Shortly after the \$10,000 loan was deposited, Shabazz withdrew \$5,000 in cash and transferred another \$1,000 into one of her personal bank accounts.

152. Bank records show that another \$5,000 in SBA loan proceeds was deposited into the Shabazz's Bank of America account on or about July 13, 2021. The subsequent withdrawals from this account appear to be primarily personal in nature, including numerous withdrawals for restaurants, gas, and retail. On or about July 16, 2021, there was also a cash withdrawal of \$300.

153. An application dated February 14, 2021, was submitted for a SBA PPP loan for a business named Raheema Shabazz, a sole proprietorship. The business address was reportedly 7038 Brooklyn Blvd. Suite F, Minneapolis, MN, although some of the sales receipt submitted in support of the application reported the business was located at **Subject Premises 1**. According to the application, the year of establishment for the business, Raheema Shabazz, was February 19, 2019, and the owner was listed as Shabazz. The requested PPP loan amount was \$20,833.33. Shabazz later applied for and was granted a loan forgiveness.

154. According to Bank of America records, on or about January 21, 2021, an account was opened with Bank of America in the name of “Raheeman” Shabazz. On or about April 12, 2021, \$20,833 from Itria Venture was deposited into the account, the proceeds from the PPP loan. On April 16, 2021, Shabazz withdrew \$2,600 in cash from the account, and made numerous transfers, which totaled approximately \$14,000, to her other Bank of America account over the next month. From there the funds were used at GAP outlet, OnStar Data Plan, Polo Ralph Lauren, Adidas, Guess, Cash App payment to “Junios,” restaurants in Arizona, Thai Royal Massage in Arizona, Nordstroms (\$825), Stevan’s Diamonds, Gables Cosmetics (\$1,000), CG Cosmetic Surgery (\$500), Gold Room (\$500), and Louis Vuitton (\$2,139.75), among various other seemingly personal purchases.

155. According to an invoice dated on or about June 22, 2021, FMG billed Hennepin County for 10 hours of work for Absolutely White. FMG reported they helped with business writing and logo design. The business address for Absolutely

White was reportedly 3300 County Road 10 W, Minneapolis, MN 55429. According to an online search, this address is an office building.

156. On or about September 25, 2021, an email was sent from the FMG email account entertainmentsuccessful@gmail.com, which is used by El-Amin Champion, to absolutelywhite3@gmail.com, the email account for Absolutely White. There is no content in the email but the subject line stated, “Your Payroll report.” The attachment to the email was a 2021 payroll register for Absolutely White listing three employees.

157. Shortly after that email, on or about September 25, 2021, another email was sent from the FMG email account entertainmentsuccessful@gmail.com to absolutelywhite3@gmail.com. The email has no content, but the subject was, “What you submitted for grant (Please keep for your ref).” The attachment to the email is a third quarter 2021 profit and loss statement for Absolutely White, which shows gross revenues of \$40,823.

158. On or about December 28, 2021, another EIDL application was submitted for Absolutely White. The business address was reportedly 1041 James Ave N, Minneapolis, MN 55401. This application does not appear to have been funded.

159. All of Shabazz’s applications appear to be fraudulent. She did not run Absolutely White or any other business. Rather, in or about May 2019, Shabazz applied for SNAP food assistance in Hennepin County for herself and one child. Shabazz listed her address as **Subject Premises 1**, and that she lived there with her son and grandmother. At that time Shabazz reported that no one in the household

had a job or had been self-employed in the past three years, nor was anyone in the household currently self-employed and expecting income that month or the following month.

160. In or about January 2021, Shabazz applied for Minnesota Child Care Assistance, a program that can help make childcare affordable for low-income families. Shabazz reported on her application that she lived at **Subject Premises 1** with her son. She reported that she received \$637 per month in public assistance but that otherwise no one in her household earned income or was self-employed.

161. In or about July 2021, Shabazz applied for public assistance through Hennepin County with food assistance and cash programs. Shabazz reported her address was still **Subject Premises 1**. She claimed no one in the household would earn any income that month. Shabazz also stated that no one in the household had a job or had been self-employed in the past three years, nor was anyone currently self-employed and expecting income during the month or the following month. Nowhere in any of her applications for public aid did Shabazz report that she owned or operated Absolute White or any other business, or that she received money from a PPP loan.

162. According to Minnesota Department of Employment and Economic Development (“DEED”) data, Shabazz received \$2,338 in Pandemic Emergency Unemployment Compensation between February 2021 and June 2021. During that same period, she also received \$4,200 in Federal Pandemic Unemployment Compensation.

2. Larcina Champion

163. As stated above, Hennepin County property records reported Larcina Champion (“Larcina”) as the owner of **Subject Premises 1**. Larcina is also believed to be El-Amin Champion’s grandmother. As described below, an EIDL loan was submitted in her name using **Subject Premises 1** as the address on the application.

164. On or about July 7, 2020, an application was submitted to the SBA for an EIDL loan in the name of a business, “Larcina Champion”. The primary address listed on the application was **Subject Premises 1**. According to the application the business started operation on October 11, 2018, as of January 31, 2020 it had 10 employees, and its gross receipts/sales was \$70,000. Larcina was listed as the owner of the business.

165. According to Wells Fargo Bank, they were unable to locate bank records for Larcina based on her social security number.

166. According to IRS records, Larcina did not file tax returns for the years 2019-2021.

3. Larcina Bryant and New Youth Redevelopment LLC and New Youth Programs

167. Larcina Bryant (“Bryant”) is believed to be El-Amin Champion’s aunt. As described below, Bryant has used **Subject Premises 1** as her residential address and business address and for loans in her business’ names. There are also surprising similarities in Form 990s submitted to NextStage for both Bryant’s business and Encouraging Leaders, one of El-Amin Champion’s companies. In addition, FMG

submitted an invoice to Hennepin County for the Navigator program in which it claimed providing services to one of Bryant's companies.

168. According to online records, on or about March 5, 2020, "New Youth redevelopment LLC ("New Youth Redevelopment") was registered with the Minnesota Secretary of State. The principal executive office was located at **Subject Premises 1**, which was the same address on Bryant's driver's license. The registered office address and manager's address were 2507 Bryant. Larcina Bryant was reported as the registered agent and manager.

169. On or about June 29, 2020, an application was submitted to the SBA for an EIDL loan in the name of New Youth Redevelopment, doing business as "New youth Redevelopment". Bryant was listed as the owner and her contact information reported her address was **Subject Premises 1**. The application to SBA identified Bryant as the company's owner and listed **Subject Premises 1** as her address. The application reported—falsely—that business was established on January 1, 2018. The application falsely claimed that the company had six employees and more than \$200,000 in gross revenue.

170. On or about July 8, 2020, an application was submitted for an SBA PPP loan in the name of New Youth Redevelopment, located at 2507 Bryant. The application stated that Bryant was the sole owner of New Youth Redevelopment and that the company was located at **Subject Premises 1**. The application claimed that the business had been established on December 1, 2019, and that it had an average monthly payroll of \$8,334. New Youth Redevelopment LLC was issued a loan of

\$20,833, which was later forgiven. In or about February 2022, Bryant called Kabbage, Inc. because she was having problems accessing her loan account online. Bryant asked for assistance in applying for loan forgiveness and for a copy of her initial application. The customer service representative was unable to provide her with a copy of her initial application but helped walk her through completing and submitting her loan forgiveness application online.

171. Law enforcement obtained bank records from Community Resource Bank for New Youth Redevelopment. According to the bank records, on or about July 10, 2020, the PPP loan proceeds of \$20,833 were deposited into the account. Subsequent withdrawals included a \$4,000 cash withdrawal on July 16, 2020 and a \$1,500 cash withdrawal on July 20, 2020.

172. On or about January 7, 2021, Hennepin County received a SBR grant application for “New Youth redevelopment”. The business was reportedly established in January 2018, started generating revenue in February 2018, and was located at 2507 Bryant. The authorized business representative was listed as Bryant, CEO. A 2019 Form Schedule C, Profit or Loss from Business was submitted during the application process. The form reported \$40,000 in gross receipts earned, although there was no business name listed on the form. The total wages expensed on the Schedule C were \$4,167.

173. According to online records, on or about September 10, 2020, New Youth Programs was registered with the Minnesota Secretary of State as a nonprofit corporation. Bryant was reported as the registered agent and president of New Youth

Programs. The president's address and the registered office address were listed as **Subject Premises 2** and the registered office address added Suite 307 to **Subject Premises 2**. On January 25, 2023, New Youth Programs was involuntarily dissolved.

174. On or about January 7, 2021, Hennepin County received a grant application for their Small Business and Nonprofit relief program for a business that listed its legal name as "New youth programs." The business representative was listed as Larcina Porter, Director, with the email address larcinabryant@icloud.com. The business address was reported as **Subject Premises 2**, Suite 307. New Youth Programs was reportedly established in September 2019 and began earning income in November 2019.

175. A 2019 Form 990, Return of Organization Exempt from Income Tax, was submitted to NextStage in support of the application. The expenses reported on the Form 990 followed the same number pattern as the Form 990 submitted by Encouraging Leaders. For example, Encouraging Leaders reported \$11,862 for salaries and New Youth Programs reported \$9,862, repeating the last three digits of the salaries reported by Encouraging Leaders. Encouraging Leaders reported \$3,508 for other expenses, and New Youth Programs reported \$1,508 for other expenses. Encouraging Leaders reported \$16,695 for total expenses and New Youth Programs reported \$11,695. An online website that houses Form 990s for public review was searched for New Youth Programs, but none were found for New Youth Programs.

176. According to an invoice dated June 22, 2021, submitted to Hennepin County for the Elevate Business program, FMG reported that they helped New Youth

Programs with logo, business writing, flyer, and business cards for 10 hours. The business owner was listed as Larcina Bryant and the business address was listed as **Subject Premises 2**.

177. According to online records, on or about October 20, 2021, the business Bullzeye Logistics L.L.C. was registered with the Minnesota Secretary of State. Larcina Bryant was listed under registered office address with the address **Subject Premises 1**. On or about February 8, 2023, the business was administratively terminated.

178. Larcina Bryant and Larcina Porter appear to be the same person. Larcina Champion appears to be related to Larcina Bryant/Porter.

179. According to IRS records, New Youth Redevelopment was filed on a Form Schedule C for the tax year 2020. No Forms 941, Employers Quarterly Tax Returns, were filed. No Forms 990 were found for New Youth Redevelopment.

4. Taurus Bryant

180. Taurus Bryant (“Taurus”) is believed to be El-Amin Champion’s ex-uncle by marriage. Taurus’ driver’s license reported his address as **Subject Premises 1**, and an EIDL loan was submitted in his name using the address of **Subject Premises 1**.

181. On or about July 3, 2020, an application for an EIDL loan was submitted to the SBA for a company doing business as “Taurus Bryant.” The business address was **Subject Premises 1** and Taurus was listed as the owner. According to the application, the business was established on or about October 10, 2018. The entity

type was listed as an independent contractor and the number of employees was listed as ten (10).

182. Law enforcement obtained records from Wells Fargo Bank, where Taurus holds bank accounts. According to the bank records, on or about July 7, 2020, a \$10,000 EIDL loan payment from the SBA was deposited into Taurus' account. The balance on this account prior to the deposit was approximately \$102.47. On or about July 13, 2020, almost one week after receiving the grant, Taurus withdrew \$2,500 from the account. The bank account into which the funds were deposited appeared to be used for primarily personal expenditures such as withdrawals to a furniture store (\$2,000), a resort, gas stations, hotel, rental cars, airline tickets, restaurants, Louis Vuitton (\$1,501.55), Planet Fitness club fees, mortgage payments (\$1,300, with note: Larcina Porter), and liquor stores.

183. In or about June 2021, an application was submitted to the SBA for a Targeted Advance. The application was put on hold due to suspected EIDL fraud. The SBA noted the business financial information was suspicious due to rounded numbers and unreasonable amounts. The application was ultimately declined.

5. Casharae Bell

184. A PPP loan was submitted in the name Casharae Bell using **Subject Premises 1**.

185. On or about April 28, 2021, an SBA PPP loan application was submitted for a business, "Casharae Bell." The business was reportedly located at **Subject Premises 1**. According to the application, in 2020 the gross income for the business

was \$112,000. The application reported one employee, including the owner. The requested loan amount was \$20,832 and it was approved on or about May 13, 2021. A 2020 Form Schedule C, Profit or Loss from Business, was submitted as part of the application process. The form listed the business as a “Baths, steam or Turkish,” and reported \$112,000 in gross receipts received and no business expenses, for a profit of \$112,000. The business address was reportedly located at **Subject Premises 1**. On or about April 14, 2022, a PPP Loan Forgiveness Application Form 3508S was filled out for the business, Casharae Bell, and electronically signed by Casharae Bell. The signer certified that, among other things, the PPP loan proceeds were used according to the rules relating to “...the amount of PPP loan proceeds that must be used for payroll costs.” On or about April 20, 2022, the loan was forgiven.

186. Law enforcement obtained bank records for Bell. According to the bank records, on or about May 25, 2021, the \$20,832 from the PPP loan was deposited into her account. There are numerous withdrawals, that appear to be cash withdrawals, from this account in the following days, including two on May 27, 2021, for \$800 and \$203, two on May 27, 2021, for \$602.50 and \$402.50, and two on May 28, 2021, for \$202.75 and \$103. Additional withdrawals from the account appear to be primarily personal in nature, including withdrawals for restaurants, Uber, and internet or telephone providers.

187. On or about June 12, 2021, an EIDL application was submitted with the SBA for a sole proprietorship “Casharae Bell.” The business address was listed as 5833 73rd Avenue N, Apt. 31, Brooklyn Park, Minnesota. According to the application,

the business was established on April 8, 2018, had gross revenues of \$200,900, cost of goods of \$140,000, rental properties of \$26,000, and it employed 90 people. Bell was listed as the owner of the business. The application was declined.

188. According to IRS records, Casharae Bell filed individual income tax returns for the years 2019-2021. It is not known if Bell reported a Schedule C business on her return.

6. Aqueelah Champion and Aqueelah Hair Braiding and Aqueelah Thacook Champion Catering LLC

189. Aqueela Champion (“Aqueela”) appears to be related to El-Amin Champion and she also uses **Subject Premises 1** as her residence. Loans and a grant in her business names were submitted using **Subject Premises 1** as the business’ address. In addition, FMG billed Hennepin County as part of the Navigator program for services allegedly provided to one of Aqueelah’s businesses, as described below.

190. On or about January 17, 2019, Aqueelah Champion submitted an application for public assistance with Hennepin County. On the application, she reported that she lived at **Subject Premises 1** with her daughter, son, and grandmother, Larcina Champion. She reported that no one in her household had a job or had been self-employed in the past three years, no one expected to get a job in the next month, and there were no expected changes to their income. She also answered that she had no cash, no vehicles, and no bank accounts.

191. According to online records, on or about September 14, 2020, “Aqueelah ThaCook Champion Catering LLC L.L.C.” (“Aqueelah ThaCook Catering”) was registered with the Minnesota Secretary of State. There was no registered agent

listed but a registered office address was listed as **Subject Premises 1**. On or about February 3, 2022, the business was administratively terminated.

192. On or about September 22, 2020, Aqueelah submitted an application to Hennepin County for public assistance. At that time, she reported her address was **Subject Premises 1** and that she lived there with her son, daughter, and grandmother Larcina Champion. She reported monthly income of \$350 from child support. She reported someone in her household had a job or had been self-employed in the previous 12 months, but no one in the household expected to get income from a job that month or the next. She also reported no one in the household was self-employed or expected to get income from self-employment that month or the following. An employee at Hennepin County noted on the application that another public assistance application reported Edlaxis Champion and her children also lived at **Subject Premises 1**.

193. On or about June 26, 2020, an EIDL application was submitted to the SBA for the business Aqueelah Hair Braiding, owned by Aqueelah Champion. According to the application, the business began operating on March 12, 2019, was located at **Subject Premises 1**, and employed three people. The gross receipts/sales reported on the application were \$157,000 and the total cost of goods sold was listed as \$59,000. The application was declined. On or about July 1, 2020, an advance reconsideration application was submitted. This application appears to have been denied. An online search with the Minnesota Secretary of State business records produced no results for Aqueelah Hair Braiding.

194. On or about December 1, 2020, an application was submitted to Hennepin County for a SBR grant for “Aqueelah ThaCook Champion LLC.” The business address on the application was **Subject Premises 1**, however, a 2019 Form 1120, US Income tax Return for an S-Corporation, filed in support of the application, reported the business address as 4302 Nicollet Ave S, Minneapolis, MN 55409. The Form 1120 for 2019 listed a total income of \$85,000, and minus deductions, a total ordinary business income of \$31,777. A grant agreement was executed between NextStage and Aqueelah ThaCook Catering for the \$10,000 SBR grant. On or about March 4, 2021, the grant agreement was electronically signed by “Aqueelah Champion.”

195. Law enforcement obtained US Bank records for Aqueelah ThaCook Catering. According to the US Bank account application, on or about January 5, 2021, Aqueelah opened a US Bank account for Aqueelah ThaCook Catering. The address on the application was **Subject Premises 1**. According to the bank records, on or about March 9, 2021, \$10,000 from NextStage was deposited into the account for Aqueelah ThaCook Catering. The balance in the account was \$100 prior to the deposit. After the deposit, the next three transactions were a \$4,900 cash withdrawal on March 12, a \$500 ATM withdrawal on March 15, and a \$4,500 cash withdrawal on March 26, 2021.

196. On or about March 15, 2021, a PPP loan application was submitted to the SBA in the name of Aqueelah Thacook Champion Catering. According to the application, the business owner was Aqueelah and the business address was **Subject**

Premises 1. The application reported the date the business was established as December 1, 2018, it currently had two employees, and had an average monthly payroll of over \$21,000 and a total gross revenue of \$329,062. A 2019 IRS Form 940 submitted with the application, stated the business had total payments to all employees of \$153,600. The loan was approved for \$52,833 and was ultimately forgiven. The lender was Customers Bank.

197. According to the US Bank records for Aqueelah ThaCook Catering, on or about March 31, 2021, \$52,833 was deposited into the account from Customers Bank. The very next transaction, on April 2, 2021, was a \$5,000 cash withdrawal. Over the next few months there are several withdrawals from the account that appear to be large cash withdrawals and personal living expenses. For example, in May 2021, the following withdrawals occurred: Macy's (\$248.80), Papa John's (\$391.38), Famous Dave's (\$166.90), Cash withdrawal (\$5,000), American Eagle (\$189.80), Cash withdrawal (\$1,000), Nike, Bambini Fashion (\$1,737), and payments to Crescent Bank totaling over \$5,000. In June 2021, there were withdrawals to Minneapolis Impound, Cash withdrawals (\$2,600 and \$2,200), and a \$9,000 withdrawal to Jaguar Land Rover. In July 2021, there were a few withdrawals to Great Wolf Lodge.

198. According to an invoice submitted on or about June 30, 2021, to Hennepin County as part of the Navigator program, FMG billed Hennepin County for twenty-five (25) hours of services provided to Aqueelah ThaCook Catering in the form of business consulting, logo design, brochure, and business writing.

199. On or about October 20, 2021, Aqueelah spoke with a Hennepin County representative over the telephone to apply to for public assistance. Aqueelah reported her address was **Subject Premises 1** and that she lived there with her son and daughter. She reported she didn't receive any income that month. She reported no one in the household had a job or had been self-employed in the past 12 months, no one in her household had been self-employed in the previous three years or currently, no one expected to obtain a job this month or next, and she did not expect any changes in income or work hours. In addition, she answered that she did not have any cash or bank accounts, but that she did have a vehicle.

200. According to MN DEED, Aqueelah received \$11,232 in pandemic unemployment assistance between October 13, 2020 and August 29, 2021. These benefits are paid to applicants who are unemployed due to the pandemic but ineligible for regular UI or any federal or state extensions. She also received \$10,800 in Federal Pandemic Unemployment Compensation.

201. In or about March and October 2022, Aqueelah submitted additional applications for public assistance. She stated her address was still **Subject Premises 1**, and that she lived there with her son and daughter.

202. According to IRS records, Aqueelah ThaCook Catering was never reported on individual or corporate tax returns or information returns.

7. Edlixis Champion and Miamore Boutique LLC and Bougie Bundles

203. Edlixis Champion ("Edlixis") is believed to be El-Amin Champion's aunt. She has used **Subject Premises 1** as her residential address. In addition, as

described below, loans in her business' names were submitted using the address of **Subject Premises 1**.

204. On or about March 3, 2021, Marcus Hamilton emailed Edlixis what appeared to be fraudulent tax documents. The subject line stated, "Tax Docs" and the content of the email stated, "See attached." Among the attached documents is a 2019 IRS Form 1040 for Edlixis, that is dated, but unsigned.

Sign Here	Under penalties of perjury, I declare that I have examined this return and accompanying schedules and information, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information furnished by taxpayer.	
	Your signature	Date 1-15-20
Joint return? See instructions.		

205. A few minutes after his initial email, Hamilton emailed Edlixis again. The subject line stated, "New Docs" and the content of the email stated, "See attached." This time the 2019 tax return, with the same numbers as the attachment from the previous email, is supposedly signed by Edlixis even though the email came from Hamilton.

Sign Here	Under penalties of perjury, I declare that I have examined this return and accompanying schedules and information, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information furnished by taxpayer.	
	Your signature <i>Edlixis</i>	Date 1-15-20
Joint return? See instructions.	Spouse's signature. If a joint return, both must sign. Date	

206. According to online records, on or about April 6, 2021, Miamore Boutique LLC was registered with the Minnesota Secretary of State. The registered office address was 6784 Grimes Place North, Minneapolis, Minnesota. No registered agent was listed. On or about February 7, 2023, the business was administratively terminated.

207. On or about July 1, 2020, an SBA EIDL application was submitted for a company doing business as “Miamore boutique.” On the application, it was reported that Miamore Boutique was a sole proprietorship owned by Edlixis Champion, doing business in the retail, clothing and apparel, industry. They reported ten employees, as of January 31, 2020. According to the application, the business began operating on January 1, 2019 and its address was **Subject Premises 1**. The gross receipts/sales were \$14,500 and the cost of goods sold were \$11,300. The application did not result in an approved loan.

208. On or about July 16, 2020, an application was submitted to the SBA for an EIDL loan for the business, “Bougie bundles,” a sole proprietorship located at **Subject Premises 1**. According to the application, this business began operating on January 23, 2017, was in the agricultural industry, and it employed ten people as of January 31, 2020. Edlixis Champion was listed as the owner. The business had \$98,000 in gross receipts/sales and its cost of goods sold was \$30,000. This application did not result in a loan. A search of the Minnesota Secretary of State online business records produced no results for Bougie Bundles.

209. In or about October 2, 2020, Edlixis submitted an application with Hennepin County for public assistance. She reported her address was **Subject Premises 1** and that she lived there with her son and daughter. She reported no one in the household expected self-employment income that month or the following month. She reported her employer was TDLR. She answered that her household had

\$60.00 in cash, checking or savings. She reported she did have a bank account, but she did not have any cash.

210. On or about April 10, 2021, an application was submitted for a SBA PPP loan in the name of a business, “Edlxis Champion”, doing business as “Miamore boutique LLC”. According to the application, Edlxis Champion was listed as the owner of the business, which reported it was established in 2020 and had an address of **Subject Premises 1**. The loan application reported a 2019 gross income of \$108,550 and requested a loan amount of \$20,832. It was electronically signed by Edlxis Champion. The lender was Prestamos CDFI, LLC. On or about September 28, 2021, a PPP loan forgiveness application was submitted for Miamore and electronically signed by Edlxis Champion, thereby certifying that the loan forgiveness application and certifying that the funds were used in accordance with the PPP use of proceeds rules. According to the loan forgiveness application, the business had three employees at the time of the loan application and at the time of the forgiveness application. On or about October 28, 2021, the loan was forgiven.

211. According to the US Bank records for Edlxis Champion, on or about June 14, 2021, a PPP loan of \$20,832 from Prestamos was deposited into her account. That same day she made a customer withdrawal of \$5,000. Over the next month, she had several withdrawals from the account that appear to be primarily personal expenditures, including Cash App Don Car (\$1,000), Nordstrom (\$830), Mt Olympus Resort Wisc Dells (\$1,229.08), and Enterprise (\$918.98).

212. On or about April 15, 2021, Edlixis Champion submitted an application for public assistance. She reported her address was 6784 Grimes Place N #M, Brooklyn Center, Minnesota. She reported she received \$0 income that month. She also reported no one in the household expected to get income that month, nor was anyone self-employed, however she reported she expected a change in income. She reported having no bank account.

213. On or about April 21, 2021, a second SBA PPP loan application was electronically signed by Edlixis Champion for the business “Edlixis Champion” doing business as “Miamore boutique,” located at 6784 Grimes Place North, Brooklyn Park, Minnesota. According to the application, the business was established in 2019 and employed three people. The application reported an average monthly payroll amount of \$13,500 and requested a loan amount of \$33,750. According to the application, the purpose of the loan was to be for payroll costs, utilities, covered operations expenses, and covered supplier costs. Edlixis Champion was listed as the owner of the business and her address was listed as **Subject Premises 1**. A Form 940 for 2020, Employer’s Annual Federal Unemployment (FUTA) Tax Return, was submitted in support of the application. On Form 940, Part 2, outlines the FUTA taxes paid before adjustments and line 3 of this section states, “Total payments to all employees.” Line 3’s amount reported by Miamore was \$162,000. On or about January 13, 2021, this form was signed by Edlixis Champion. The loan was approved and processed by the lender, Cross River Bank. On or about November 6, 2021, a PPP Loan Forgiveness

Application was submitted for this loan and electronically signed by Edlxis Champion. On or about November 18, 2021, the loan was forgiven.

214. According to the US Bank records for Edlxis Champion, on or about April 23, 2021, a \$33,750 deposit from Cross River Bank was deposited into her account. On the same day, there were two customer withdrawals, one for \$2,000 and one for \$10,000. Over the next month, there were several withdrawals from the account that appear to be primarily personal expenditures, including payments to Apple, gas stations, Sleep Inn, Securus Inmate, Netflix, Amazon, McDonalds, and Burberry (\$2,737.17).

215. On or about January 12, 2021, an EIDL application was submitted to the SBA for a business in the name of “Edlxis Champion,” a sole proprietorship located at **Subject Premises 1**. Under individual owners, Edlxis Champion’s name was listed with the Title/Office as “other.” According to the application, the business began operating on March 16, 2017, was in the hair and nail salon industry, and had 10 employees as of January 31, 2020. The gross receipts/sales were reported as \$90,000.

216. On October 14, 2022, surveillance was conducted of the building located at 6784 Grimes. It is a residential townhouse with no signs for a business at the location.

217. According to Edlxis’ US Bank records, from on or about April 2020 through August 2021, Edlxis received regular MN Unemployment Insurance (UI) benefit payments.

218. A Facebook account was found for Edlxis Champion. The “About” section reported that she worked at Foot Locker. There was no reference to a Miamore Boutique.

219. On or about May 4, 2022, Edlxis Champion submitted another application for public assistance. She reported her address was **Subject Premises 1** and that she lived there with her two children. Edlxis reported that no one in the household was self-employed, but that she expected her household would receive \$1,040 in income that month and that her employer was DTLR. She reported having no bank account.

220. According to IRS records, MiaMore Boutique never filed corporate or employers tax returns, nor was it reported on a Form Schedule C on anyone’s individual income tax return.

8. Nona’s Braiding and Nona’s Beauty Bar

221. Nona Champion (“Nona”) is believed to be El-Amin Champion’s grandmother. Nona is believed to live at **Subject Premises 1**. A loan was submitted for one of her businesses using **Subject Premises 1** as the business address. In addition, there are surprising similarities on the Schedule C submitted for a loan in one of Nona’s business’ names and numerous other Schedule Cs submitted for another loans linked to El-Amin Champion, as described below.

222. According to online records, on or about July 10, 2020, Nona’s Braiding was registered with the Minnesota Secretary of State. The principal place of business address was listed as **Subject Premises 1**. Nona Champion (“Nona”) was the

nameholder. On or about January 28, 2022, Nona's Braiding administratively expired.

223. On or about April 29, 2021, an application was submitted for an SBA PPP loan in the name of "Nona Braiding." According to the application, the business was established in 2018. The business address listed on the application was 3451 Cedar Ave, Minneapolis, MN 55407. The application reported the business employed two people and had total gross income of \$192,214 in 2019. The requested loan amount was \$40,045. Nona electronically signed the application.

224. A 2019 Form 1040 with a Schedule C, Profit or Loss from Business, was submitted in support of Nona's PPP application. The Schedule C reported gross receipts of \$192,214 and wages of \$110,400. As shown in the table below, the Schedule C claimed some identical expenses and some nearly identical expenses as the Schedule Cs submitted with loan applications for four other individuals, Shaquille Sargent, MoTeace Stewart, Chantell Isanda, and Evelyn Strickland, all described more fully below. Of the five Schedule Cs, four of them were submitted with the corresponding tax return, and all four of these returns claimed to be self-prepared and signed on the same date, January 15, 2020.

Table 1.1

	Advertising	Commissions & Fees	Legal & Professional Services	Repairs & Maintenance	Utilities
Nona Champion	14,564	1,321	2,158	6,315	19,135
Shaquille Sargent	4,564	135	2,158	6,315	29,135
MoTeace Stewart	7,564	1,135	2,158	4,315	19,135
Chantell Isanda	4,564	135	2,158	6,315	8,135
Evelyn Strickland	4,564	135	2,158	6,315	9,135

(This is similar to the way the 2019 Form 990s for Encouraging Leaders and New Youth Programs both contained a similar pattern of numbers, as described above.)

225. On or about June 26, 2020, an application was submitted for an SBA EIDL loan for a business with the legal name “Nona Braiding” and doing business as “Nona Beauty Bar.” Nona was listed as the owner and the address was listed as **Subject Premises 1**. According to the application, the business began operations on December 20, 2018, and had three employees as of January 31, 2020. The application also reported \$167,000 in gross receipts/sales and \$54,000 for cost of goods for the business. No funds were disbursed because the SBA suspected EIDL fraud.

226. The tax identification for Nona’s Braiding and Nona’s Beauty Bar is the social security number for Nona. According to IRS records, this tax identification number was not reported on a Schedule C for the years 2019-2021.

9. Edlaina Champion and Sassy Savy

227. Edlaina Champion (“Edlaina”) is believed to be El-Amin Champion’s aunt. **Subject Premises 1** was used as the business address for loans submitted for Edlaina’s company and in her name, as described below.

228. According to online records, on or about September 11, 2019, Sassy Savy LLC was registered with the Minnesota Secretary of State. The registered office address, principal executive office address, and manager address was **Subject Premises 1**. Edlaina Champion was listed as both the registered agent and manager. On or about February 6, 2023, the business was administratively terminated.

229. On or about June 23, 2020, an EIDL application was submitted for Sassy Savy. On the application, it was reported that Sassy Savy LLC was a limited liability company created August 1, 2018. The business claimed to be in retail with two employees and gross receipts of \$13,578. The business address was **Subject Premises 1**. The application was declined and did not result in an approved loan.

230. On or about June 25, 2020, an additional EIDL application for Sassy Savy was submitted. On the application, it was reported that Sassy Savy was a limited liability company created on August 1, 2018. The business claimed to be in retail with two employees and gross receipts of \$13,578. The business address was **Subject Premises 1**. The application did not result in an approved loan.

231. On or about July 16, 2020, an EIDL application was submitted for a business called “Edlaina T Champion.” On the application, it was reported that Edlaina T Champion was a sole proprietorship in automotive repair created on July 17, 2018. On the application, the business claimed to have ten employees and gross receipts of \$98,325. The business address was **Subject Premises 1**. The application did not result in an approved loan. The SBA flagged the loan application for “Suspected EIDL Fraud.” An online search for Minnesota Secretary of State records for the business Edlaina T Champion produced no results.

232. On or about August 4, 2020, an application for Sassy Savy was submitted during Round 2 of the Hennepin County Small Business grants. The application requested a \$14,500 grant for the retail store and was certified by Edlaina Champion. The business address listed on the application was 3453 Penn Avenue

North, Minneapolis, MN 55412. This address was also used for Hennepin County grant applications for Loneisha Elmore Natural Hairbraiding (Loneisha Elmore) and Curvaceous Closet LLC (Yasmeen Almonte). The Covid impact statement attached to Yasmeen Almonte's application states that the location was damaged when the business was closed, while Edlaina Champion's statement did not mention any damage. A 2019 profit and loss spreadsheet provided in support of the application for Sassy Savy is similar to the 2019 profit and loss spreadsheets provided by MiAmore Boutique (Edlixis Champion) and Meek's Seafood & Soul (Charline Ross). For example, the three businesses had the exact same income and expenses from April to December 2019. The Attachment A – Itemized Budget for Use of Grant Funds provided for Sassy Savy is identical to the Attachment A provided by Meek's Seafood & Soul. Sassy Savy's application included paystubs for three employees. However, there is no record of Sassy Savy registering or paying into the unemployment insurance program. Sassy Savy's application was flagged as potential fraud by NextStage and it did not result in a grant.

233. Law enforcement obtained bank records for Edlaina Champion and Sassy Savy. On or about December 1, 2020, a business checking account at U.S. Bank was opened for Sassy Savy with Edlaina Champion as the signer. Sassy Savy was listed as a women's apparel company. According to bank records from Edlaina Champion's personal checking account at U.S. Bank, she received weekly Minnesota Unemployment Insurance (UI) benefit payments from May 2020 until her personal account was closed on or around April 20, 2021.

234. An open-source search for “Sassy Savy” resulted in only one hit for a business in Minnesota, where Sassy Savy LLC was listed as a grant recipient for the “Restore North Campaign.”

10. Artiste Mayfield and Me And My Sis-Stirs

235. **Subject Premises 2** was reported as Artiste Mayfield’s business address in a grant application submitted for her company. FMG also submitted multiple bills to Hennepin County as part of the Navigator program for services allegedly provided to Mayfield’s business.

236. According to online records, on or about January 28, 2019, Me And My Sis-Stirs LLC was registered with the Minnesota Secretary of State. The manager was listed as “Artiste wendy Mayfield” and the registered office address, manager address, and principal executive office address was listed as 730 E 17th Street, Minneapolis, Minnesota.

237. On or about June 25, 2020, an SBA EIDL loan application was submitted for Me and My Sis-Stirs. According to the application, Mayfield was the owner of this business, which was in the educational services industry, and the business address was 730 E 17th Street S, Minneapolis, Minnesota. The reported business opening date was October 24, 2018, and they reported 8 employees. The reported 2019 gross revenues were \$434,000. On or about June 30, 2020, an EIDL advance of \$8,000 was funded and on or about July 2, 2020, the loan of \$10,000 was funded.

238. On or about November 23, 2020, an application was submitted for a Hennepin County REG grant in the name of “Me and my sis stirs,” described as a performing arts business. Mayfield was reported as the business representative and the address listed for the business was **Subject Premises 2**. According to a 2019 IRS Form 1120 for Me And My Sis-Stirs that was submitted with the application, the business had gross receipts or sales of \$96,428.15. On or about February 7, 2021, a grant agreement between Me and My Sis-Stirs and NextStage was electronically signed by Mayfield. The amount of the grant was \$15,000.

239. According to invoices dated December 14, 2020 and December 23, 2020, and submitted to Hennepin County, FMG spent 20 hours, per invoice, assisting Me and my sis-stirs LLC with website, graphic designs, and logo as part of the Elevate Business program. According to an invoice dated June 22, 2021, FMG reported they helped Me and My Sis-Stirs LLC with event flyer design and brochure for five hours. On all three invoices, the business owner was listed as Artiste Mayfield and the business address was listed as 730 E 17th Street, Minnesota. According to online Hennepin County property records, this address is a residential apartment building. As part of the documentation submitted to Hennepin County, FMG submitted a flyer for an event by Me and My Sis-Stirs on June 16, 2021 that included a website for the business, www.sisstirs.com. An online search for this website, resulted in no current website. But I was able to use an online archive website to view archived screenshots of the website, which provided information about Me and My Sis-Stirs on July 14, 2021 and December 23, 2021 but by June 9, 2022 (the next screenshot of the website),

the website was no longer in use. An online search for the event on June 16, 2021, showed it was held as part of several events during Youth Violence Prevention Week in Minneapolis. The bottom of the flyer lists the collaborators/sponsors as Encouraging Leaders, Forward Motion Recovery, Another Chance 4 Hope, Worldwide Outreach, PHUN, and Knowledge is Power.

G. ADDITIONAL CARES ACT LOANS AND GRANTS LINKED TO EL-AMIN CHAMPION

240. In addition to the businesses that applied for CARES act loans and grants that are connected to **Subject Premises 1** and **2**, there are also several businesses connected to El-Amin Champion that applied for or received suspicious CARES Act loans and grants. Some of these companies are purportedly owned by individuals who have received money from El-Amin Champion or one of his businesses, as described above, and some of them were reported as businesses that FMG helped as part of the Hennepin County Elevate Business program. Many of these businesses have a suspicious pattern of being registered with the Minnesota Secretary of State just prior to or during the pandemic and then that registration being terminated shortly thereafter, as well as inconsistencies on their applications. In addition, consistent with some of the loan and grant proceeds described above, some of these businesses also had large cash withdrawals after receipt of the loan or grant funding.

1. Maurice Tripp

241. Maurice Tripp was claimed as an employee of Chaos Boxing in documentation submitted in the Hennepin County grant described above as the grant

Individual T.J. reported to NextStage because El-Amin Champion submitted it in Chaos Boxing's name.

242. An application dated March 25, 2021, was submitted to the SBA for a PPP loan in the name of a business, "Maurice Tripp." On the application, the business address was listed as 9731 Minnetonka Blvd, Apt 313, Minnetonka, Minnesota. The total gross income for this business for the year 2019 was listed as \$107,000. The requested loan amount was \$20,832. The application was electronically signed by Maurice Tripp. On or about March 27, 2021, the loan was approved for \$20,832. On or about August 19, 2021, the loan was forgiven. The lender for the loan was Capital Plus Financial, LLC.

243. Law enforcement obtained bank records for Tripp at JP Morgan Chase Bank. On or about April 9, 2021, \$20,832 from Capital Plus was deposited into Tripp's account. Over \$20,000 was withdrawn from that account that same day and in the following three days. The withdrawals included payments to Zelle for Denise Thomas (\$2,000), Zelle to Mommy (\$5,000; \$5,000; and \$1,300), CashApp (\$2,500), CashApp to Catherine (\$2,500), and \$3,000 cash out.

2. Jamal Sargent and Warm Arms LLC, Common Goods LLC, and Mally Mals

244. As explained above, Jamal Sargent ("Jamal") was listed as an employee of K. Johnson Enterprises on a payroll register submitted as part of an application for a Hennepin County SBRR grant for K. Johnson Enterprises. According to the Encouraging Leaders bank records, Jamal also received a check from Encouraging Leaders in or about June 2020. In addition, Jamal filed applications for PPP loans

and EIDL loans in the names of several businesses, including Warm Arms LLC, Common Goods LLC, and Mally Mals.

245. On or about June 26, 2020, an application was submitted for an SBA EIDL grant in the name of Mally Mals, with Jamal listed as 70 percent owner of the business which was located at 3121 3rd Ave S Apt 7, Minneapolis, Minnesota. The loan was declined. On or about June 28, 2020, additional information for Mally Mals was provided for an EIDL grant, including that the business was established on March 8, 2018, had eight employees and \$82,000 in gross revenues. An online search of the Minnesota Secretary of State produced no results for Mally Mals.

246. According to online records, on or about October 20, 2020, Warm Arms L.L.C. was registered with the Minnesota Secretary of State. There was no registered agent listed but the registered office address was 3121 3rd Ave S Apt 7, Minneapolis, Minnesota. On or about February 4, 2022, the business was administratively terminated.

247. On or about January 5, 2021, an application was submitted for an SBA EIDL grant in the name of Warm Arms LLC, with Jamal listed as the owner of the business which was located at 3121 3rd Ave S Apt 7, Minneapolis, Minnesota. The business was reported as being established on October 20, 2020, it had one employee, and gross revenues of \$80,000. The application was declined.

248. On or about May 27, 2021, a PPP loan application was submitted for a business listed as Jamal Sargent, a sole proprietorship categorized as a barber shop. The business was reported as established on January 1, 2018, had one employee, and

a 2019 gross revenue of \$111,221. The applicant's address was listed as 3121 3rd Ave S Apt 7, Minneapolis, Minnesota and electronically signed by Jamal. The loan was approved for \$20,833 and ultimately forgiven.

249. Law enforcement obtained bank records from JP Morgan Chase Bank for Warm Arms. According to the records, on or about December 23, 2020, a bank account was opened for Warm Arms with Jamal as the sole signer on the account. The initial deposit into the account was a \$5,000 cash deposit which was withdrawn on the same day and paid to Brightspace Group Payment for Contracted E Com Store. According to an online search, Brightspace is an online learning management tool. The activity in this bank account is minimal. The remaining deposits are mostly cash and, other than a payment to the Minnesota Secretary of State, the withdrawals appear to be primarily personal in nature and include payments to restaurants, Megabus.com, and Expedia.

3. John Stiffin and Knowledge Is Power LLC

250. FMG billed Hennepin County as part of the Navigator program for services allegedly provided to John Stiffin's company Knowledge is Power, LLC, including for assistance with the company logo, but as described below, the logo appears to have been stolen from another company with the same name. Loan and grant applications were also submitted for Stiffin's business.

251. According to online records, on or about September 23, 2017, Knowledge is Power, LLC was registered with the Minnesota Secretary of State. John Stiffin was listed as the manager, and the registered office address, principal executive office

address, and manager address were listed as 4213 Elliot Ave S, Minneapolis, Minnesota. On or about March 20, 2019, the business was administratively terminated, but it was reinstated on July 20, 2020. On or about February 1, 2022, the business was again administratively terminated.

252. According to an invoice dated December 23, 2020, and submitted to Hennepin County for the Elevate Business program, FMG reported assisting Knowledge Is Power LLC with website, graphics, logo, and business writing for 50 hours. Stiffin was listed as the business owner and the business address was listed as 4213 Elliott Ave S. According to online Hennepin County property records, this address is a residential home owned by Stiffin.

253. On or about June 27, 2020, an SBA EIDL application was submitted for “Knowledge is power llc,” with Stiffin listed as the owner and the business address listed as 4213 Elliott Ave S, Minneapolis, Minnesota. According to the application the business was in the entertainment industry, opened on July 3, 2018, and had 8 employees. They reported 2019 gross revenues of \$367,000. The loan was approved for \$20,000.

254. Law enforcement obtained bank records for Knowledge is Power and Stiffin from US Bank. On or about July 20, 2020, Stiffin opened a Knowledge is Power bank account with US Bank. Stiffin also had a personal account with US Bank. According to the bank records, on or about July 21, 2020, \$20,000 from the SBA was deposited into Stiffin’s personal account. On or about July 23, 2020, \$15,000 was transferred from Stiffin’s personal account to the newly opened business account for

Knowledge is Power. On the same day, there was a \$3,000 customer withdrawal from the Knowledge is Power account. On the following date, July 24, 2020, there was a \$2,500 debit to FMG.

255. On or about August 10, 2020, an application for a Hennepin County grant was submitted for Knowledge is Power, with Stiffin listed as the owner and the address as 4213 Elliott Ave S, Minneapolis, Minnesota. Also submitted with the grant application was a 2019 IRS Form 1120 for Knowledge is Power. According to the form, Knowledge is Power reported gross receipts or sales of \$96,428.15. This is the exact same amount that Me and My Sis-Stirs reported on their 2019 IRS Form 1120 that was submitted with their Hennepin County REG grant application. A closer look at the Form 1120s for both companies showed that they not only reported the same gross sales or receipts, but they also reported the same cost of goods sold (\$24,183.86), the same compensation of officers (\$7,843.76), the same salaries and wages (\$34,850.80), the same rents (\$11,560.06), the same charitable contributions (\$1,688.25), and the same advertising (\$2,135.12). The grant for Knowledge is Power was approved and a grant agreement between NextStage and Knowledge is Power for \$15,000 was electronically signed by Stiffin.

256. According to bank records from US Bank, on or about October 1, 2020, \$15,000 from NextStage was deposited into the Knowledge is Power account. On or about October 5, 2020, there were two large withdrawals from the account, \$4,000 transferred to Stiffin's personal account and a \$5,000 customer counter withdrawal.

257. On or about January 5, 2021, another application for a Hennepin County grant was submitted for “Knowledge is power llc.” Stiffin was listed as the owner and the business address was 801 South Marquette Ave, Suite 200, Minneapolis, Minnesota. According to the application, this performing arts company had a website, www.knowledgeispowerllc.com. I reviewed current, as of February 2023, and archived, as of December 2021, pages for this website and according to both this website belongs to a company based in Liverpool. The copyright at the bottom of the current and archived pages stated, 2020 Knowledge is Power, showing that presumably this website has belonged to the Liverpool company since 2020. The logo used for Knowledge is Power as a collaborator/sponsor on the Me and My Sis-Stirs flyer, described above, is the same logo used by the Knowledge is Power company based in Liverpool. The logo for the Liverpool Knowledge is Power appears to have been stolen and used for Stiffin’s business, Knowledge is Power.

258. On or about March 26, 2021, there was a \$95,833 deposit from Customers Bank into the Knowledge is Power US Bank account. There were several large withdrawals from this account after the deposit, including the following:

- a. On or about March 29, 2021, \$4,000 transfer to Stiffin’s personal account,
- b. On or about March 30, 2021, \$9,000 customer counter withdrawal,
- c. On or about April 7, 2021, \$5,000 transfer to Stiffin’s personal account,

d. On or about April 13, 2021, \$15,000 customer counter withdrawal,

e. On or about April 19, 2021, \$5,000 transfer to Stiffin's personal account, and

f. On or about April 27, 2021, \$7,000 customer counter withdrawal.

259. According to the bank records, from September 2020 through February 2021, there are regular deposit's into Stiffin's personal bank account from Encouraging Leaders, totaling approximately \$7,000. From July 23, 2020 through August 30, 2021, when the account was closed, there were a total of approximately \$127,346 in deposits into the Knowledge is Power bank account. This includes the \$95,833 PPP loan deposit and the \$15,000 Hennepin County grant deposit.

4. Shaquille Sargent

260. As explained above, Shaquille Sargent shared the same residence as an individual who received funds from Encouraging Leaders, an El-Amin Champion entity. In addition, documents submitted with the Shaquille Sargent PPP loan application had surprising similarities to documents submitted with Nona Champion, El-Amin Champion's grandmother's, and others connected to El-Amin Champion, and the documents for his PPP application were inconsistent with his EIDL loan application.

261. On or about June 23, 2020, an SBA EIDL loan application was submitted in the name of a company doing business as "Shaquille Sargent," described as a sole proprietorship. Shaquille Sargent was listed as the owner of the business,

that had an address of 3121 3rd Avenue South, Minneapolis, Minnesota. According to the application, the business was in the agriculture industry, opened on August 14, 2017, and had 10 employees. They reported gross revenues in 2019 of \$95,458, but the cost of goods for that year is \$93,265. An EIDL advance was approved for \$10,000.

262. According to online Hennepin County property records, 3121 3rd Avenue South, Minneapolis is a residential rental building. A search of online records for the Minnesota Secretary of State resulted in no businesses registered with the name Sargent Remodeling.

263. According to the Wells Fargo bank records for Shaquille Sargent, on or about June 24, 2020, \$10,000 from the SBA was deposited into his account. The balance on this account prior to the deposit was \$30.69. After the deposit, there were multiple withdrawals from the account the day of the deposit and the following two days, including two \$300 ATM withdrawals, a \$500 ATM withdrawal, and a \$3,500 withdrawal in a branch/store. According to the withdrawal slip, dated June 24, 2020, the \$5,000 withdrawal appears to be a cash withdrawal of 1,000 each of \$5 bills, \$10 bills, \$20 bills, \$50 bills, and \$100 bills. Also noticeable in the account, is that from about January 2020 through November 2020, Shaquille received regular weekly direct deposits from an unrelated business that appears to be a lumber company.

264. On or about February 22, 2021, an application was submitted for a PPP loan in the name of a business, "shaquille sargent." The business owner was listed as Shaquille Sargent and the business address was listed as 3121 3rd Avenue South, Minneapolis, Minnesota. According to the application, the business was established

in 2019, in contrast to the 2017 establishment as stated in the EIDL loan application above, had 1 employee and an average monthly payroll of \$7,942. As for the purpose of the loan, the boxes for payroll costs, rent/mortgage interest, and covered operations expenditures were checked. The application was initialed and signed by Shaquille. Invoices for work purported to have been done by Sargent Remodeling, 3121 3rd Ave N, Minneapolis, Minnesota, were submitted with the application. The invoices are dated December 7, 2019, December 17, 2019, and January 4, 2020, and are each for \$18,351, billing R.H. for sodding and demolition: basic frame.

265. Additional documentation was submitted with the PPP loan application for Shaquille, including a Schedule C. As shown in Table 1.1 above (in the description of Nona Champion's PPP application), the Schedule Cs for Nona Champion, Shaquille Sargent, MoTeace Stewart, Chantell Isanda, and Evelyn Strickland all claimed some identical expenses and some nearly identical expenses. In addition, Shaquille's Schedule C claimed \$283,214 in gross receipts or sales for 2019, which is different than the gross revenues in 2019 of \$95,458 reported for Shaquille's EIDL loan application, described above.

266. Based on the application documents, the PPP loan was approved for \$19,855.

267. According to the bank records, on or about February 23, 2021, \$19,855 was deposited into Shaquille's bank account from Cross River Bank, the lender for the PPP loan. Prior to the deposit, the balance in the account was \$99.18. After the deposit, there were several withdrawals from the account that day and the following

two days, including a \$2,100 transfer to Shaquille's other checking account, a \$700 ATM withdrawal, a \$8,000 withdrawal made in a branch/store, a \$200 Apple Cash withdrawal, and a \$500 ATM withdrawal. According to the withdrawal slip, dated February 24, 2021, the \$8,000 withdrawal was a cash withdrawal taken in 2,000 each of \$5 bills, \$10 bills, \$20 bills, and \$50 bills.

5. MoTeace Stewart and Moe Braids LLC

268. Multiple loan applications were submitted for MoTeace Stewart's business entity, Moe Braids LLC ("Moe Braids"). As explained above, there are similarities between documents submitted for the Moe Braids' loans and the loan documents submitted for other entities linked to El-Amin Champion, and for entities purportedly owned by Nona Champion, Edlaina Champion, Shaquille Sargent and others. In addition, FMG billed Hennepin County for purported services provided to Moe Braids.

269. According to online records, on or about October 5, 2020, Moe Braids L.L.C. was registered with the Minnesota Secretary of State. MoTeace Stewart ("Stewart") was listed as the manager. The principal executive office address and registered office address were listed as 5701 Shingle Creek Pkwy, Brooklyn Center, Minnesota, which is an office building. On or about February 6, 2023, the business was administratively terminated.

270. On or about July 3, 2020, an SBA EIDL loan application was submitted for Moe Braids, with Stewart listed as the owner and the business address listed as 6807 86th Ln N, Brooklyn Park, Minnesota. According to the application, Moe Braids

was a sole proprietorship in the agriculture industry that opened on April 12, 2016, and had 10 employees. The 2019 gross revenues were \$98,325 and the cost of goods was \$87,496. This loan does not appear to have been funded. Some details from this application were similar to the July 16, 2020 EIDL application submitted for the business called “Edlaina T Champion,” as described above. For example, both businesses reported 10 employees, \$98,325 in gross revenues, and \$87,496 in costs of goods.

271. On or about March 9, 2021, a PPP loan application for Moe Braids was submitted and electronically signed by MoTeace Stewart, as the CEO. The application claimed the business was located at 5701 Shingle Creek Crossing. It also claimed the business had four employees and a \$16,000 monthly payroll. In addition, the application reported the business was established in 2019, which is different from Minnesota Secretary of State registration in 2020 and the purported opening date of 2016 in the EIDL loan application. Along with the application, other documents including a Schedule were submitted. As explained above this Schedule C had several similarities with other Schedule Cs as outlined in the below table:

Table 1.1

	Advertising	Commissions & Fees	Legal & Professional Services	Repairs & Maintenance	Utilities
Nona Champion	14,564	1,321	2,158	6,315	19,135
Shaquille Sargent	4,564	135	2,158	6,315	29,135
MoTeace Stewart	7,564	1,135	2,158	4,315	19,135
Chantell Isanda	4,564	135	2,158	6,315	8,135
Evelyn Strickland	4,564	135	2,158	6,315	9,135

Based on the fraudulent loan application and accompanying documents, this loan was approved for \$40,000 and ultimately forgiven.

272. FMG also claimed they helped Moe Braids. According to an invoice dated June 30, 2021, submitted to Hennepin County for the Elevate Business program, FMG reported that they assisted Moe Braids with logo, flyer, brochure, and video for 10 hours.

6. Evelyn Strickland and Heel Whore LLC

273. FMG billed Hennepin County for services purportedly provided to Heel Whore, Evelyn Strickland's business. There are also similarities between a document submitted for a grant application for Heel Whore and other entities linked to El-Amin Champion , but records appear to show that Heel Whore did not begin operations until after receiving the grant money.

274. According to online records, on or about July 19, 2020, Heel Whore L.L.C. was registered with the Minnesota Secretary of State. The manager and registered agent was listed as Evelyn Strickland ("Strickland"). The registered office address was listed as 910 Portland Ave 302, Minneapolis, Minnesota and the manager's address was listed as "910 Portland apt," Apartment 611, Minneapolis, Minnesota. On or about February 6, 2023, the business was administratively terminated.

275. According to an undated invoice submitted to Hennepin County for 2021, Quarter 1, FMG assisted Heel Whore with logo, ecommerce website, business writings, and business consulting, marketing, and advertising for 40 hours. Evelyn

Strickland was reported as the business owner and the business address was listed as 910 Portland Ave, Minneapolis, Minnesota. According to online Hennepin County property records, this address is categorized as a low-income rental.

276. On or about June 19, 2020, an SBA EIDL loan application was submitted for a company doing business as “Evelyn Lashon Strickland.” The owner was listed as Strickland and the business address was 910 Portland, Minneapolis, Minnesota. According to the application, the business was in the agriculture industry, opened on June 10, 2017, and had 70 employees. The 2019 gross revenues were reported as \$90,000 and the cost of goods was \$90,000. An EIDL advance of \$10,000 was funded.

277. Law enforcement obtained bank records for Strickland at Associated Bank. On or about June 23, 2020, \$10,000 from the SBA was deposited into Strickland’s bank account. The subsequent withdrawals from the account over the next month appear to be primarily personal in nature and include payments to airlines, retail stores, restaurants, gas stations, and Greyhound. There were also three ATM cash withdrawals on June 26, 2020, totaling \$360. A review of this bank account also showed that from June 24, 2021 through June 17, 2022, Strickland received multiple Zelle payments from Heel Whore totaling approximately \$7,338.

278. On or about January 14, 2021, an application was submitted for a Hennepin County grant in the name of Heel Whore. The application claimed the business started in October of 2019 and started generating revenue in November 2019. This is different than the registration with the Minnesota Secretary of State,

which was 2020. Strickland was reported as the owner on the application. Along with the application, a Schedule C was also submitted in support of the loan. This Schedule C has numerous similarities to four other Schedule Cs, as outlined in Table 1.1.

279. The email account for Heel Whore is heelwhore612@gmail.com. According to the emails, Strickland met with FMG in or about August 2020 and they started working on creating her website and logo in or about September 2020.

280. On or about January 14, 2021, an application was submitted for a Hennepin County grant in the name of Heel Whore. The application claimed the business started in October of 2019 and started generating revenue in November 2019, which is well before the work began on the Heel Whore logo and website. This is also different than the registration with the Minnesota Secretary of State, which was 2020 and the EIDL loan application for the business in Strickland's name that claimed to start operations in 2017. Strickland was reported as the owner on the grant application. Along with the application, a Schedule C was also submitted in support of the loan. The gross receipts or sales listed on the Schedule C was \$55,649. This Schedule C has numerous similarities to four other Schedule Cs, as outlined in Table 1.1.

281. The emails show inventory for Heel Whore was being purchased starting in or about February 2021 and payments to the business began in or about March 2021, not in 2019 as was stated in the Hennepin County grant application.

282. On or about March 31, 2021, a PPP loan application was submitted and electronically signed by Strickland. The application was for a business using the legal

name “Evelyn Strickland.” The application claimed the business was located at 910 Portland Ave. Apt. 325, which is Strickland’s apartment. The application also claimed the business began in 2020 and had one employee. The application stated the gross income listed on their 2020 IRS Form 1040, Schedule C was \$103,335, which is almost two times as much as was reported on the Schedule C for 2019 that was submitted with the Hennepin County grant application, described above. Based on the application documents, the loan was approved, but ultimately forgiven.

283. In or about April 21, 2021, the PPP loan proceeds of \$20,832 were deposited into Strickland’s account at Associated Bank. That same day there were two cash withdrawals from the account totaling \$10,000. The bank account records also showed that from June 24, 2021 through June 17, 2022, Strickland received multiple Zelle payments from Heel Whore totaling approximately \$7,338. In or about August 2021, Heel Whore began selling shoes at a local mall.

284. According to IRS records, no tax return, individual or business were filed to report income from Heel Whore for the years 2019-2021. In addition, no Employers Quarterly Income tax returns (Form 941) were filed to report wages to employees.

7. Chantell Isanda and Second2noneremodeling LLC

285. FMG billed Hennepin County for purportedly providing services to Chantell Isanda’s business, Second2noneremodeling. In addition, loan and grant applications submitted for Isanda’s business were linked to other grant and loan applications connected to El-Amin Champion.

286. According to online records, on or about May 19, 2020, Second2noneremodeling LLC was registered with the Minnesota Secretary of State. No registered agent was listed. The registered office address was listed as 202 N Cedar Ave, Ste. 1, Owatonna, Minnesota. On or about February 2, 2022, this business was administratively terminated.

287. On or about December 1, 2020, a Hennepin County REG grant application was submitted for Second2noneremodeling LLC, with Isanda listed as the authorized business representative and the business address, and where the business operated or was conducted, was listed as 1815 Clinton Ave Unit 1, Minneapolis, Minnesota. According to a 2019 IRS Form 1120-S submitted with the application, Second2noneremodeling reported \$85,000 in gross receipts or sales for that year. This was the exact same amount of gross receipts or sales that was on a 2019 Form 1120-S submitted with a Hennepin County grant application for Aqueelah ThaCook Catering. A closer look at the Form 1120-Ss submitted for these two companies showed that they both not only reported the same gross receipts or sales, but also reported the same salaries and wages (\$21,120), the same repairs and maintenance (\$2,760), the same bad debts (\$3,190), the same rents (\$10,900), the same taxes and licenses (\$2,670), the same interest (\$3,203), the same depletion (\$1,586), the same advertising (\$2,560), the same pension, profit-sharing, etc., plans (\$1,702), the same employee benefit programs (\$2,188), and the same other deductions (\$1,344).

288. According to an undated invoice submitted to Hennepin County for 2021, Quarter 1 Elevate Business program, FMG assisted “Secon2none LLC” with

business writing and business consulting for 2.5 hours. The business owner was listed as Chantell Isanda and the business address was listed as 1705 25th Ave N, Minneapolis, Minnesota. According to online Hennepin County property records, this address is a residential home.

289. On or about March 18, 2021, an SBA PPP loan was submitted for Second2noneremodeling LLC and electronically signed by Isanda. The IP address used to submit the application when it was electronically signed by Isanda was 50.237.67.70, the same IP address described above as being used by El-Amin Champion, Chaos Boxing, and Murschel Outdoor Services and is registered to **Subject Premises 2**. According to the application, the business was established in 2019, had 4 employees and was located at 1705 North 25th Avenue, Minneapolis, Minnesota. The average monthly payroll for the business was listed as \$15,423. The request loan amount was \$38,557 and the purpose of the loan was purported to be for payroll costs. A 2019 IRS Form 1040 was submitted with the application listing the business' total income as \$50,205. Also submitted, was a voided check from Wells Fargo for the account of Willis White at 1705 25th Ave N. In addition, a Schedule C was also submitted. This Schedule C has several similarities to the other Schedule Cs as described Table 1.1 above.

290. Law enforcement obtained bank records from Wells Fargo for Isanda. According to the bank records, on or about February 11, 2021, \$10,000 from NextStage and payable to Second2None Remodeling was deposited into Isanda's joint personal bank account with Willis White. Prior to the deposit, the balance in the

account was \$58.91. After the deposit on February 11, an ATM cash withdrawal was made from the account for \$604. The following day there was a purchase at WalMart for over \$400 which included \$100 cash back. The subsequent withdrawals from the account appear to be primarily personal in nature, including payments to an online gaming company, an online marketplace company, restaurants, and utility companies. In addition, on or about February 16, 2021, there was a \$3,010 withdrawal from a branch/store and on or about February 17, 2021, there was a \$159 payment to a jewelry store.

291. According to IRS records Second2none Remodeling was reported on a Form Schedule C on an individual tax return for the year 2020, but not for 2019 or 2021. No Employers Quarterly Income tax returns (Form 941) were filed to report wages to employees for the years 2019-2011.

8. Nasir El-Amin and Sir's Cleaning Services LLC and King Fashions

292. FMG billed Hennepin County for purported services provided to Sir's Cleaning Services, owned by Nasir El-Amin ("Nasir"). Nasir is believed to be El-Amin Champion's brother. In addition, a loan application was submitted in the name of another entity, that was allegedly owned by Nasir.

293. According to online records, on or about January 14, 2021, Sir's Cleaning Services LLC was registered with the Minnesota Secretary of State. No registered agent was listed. The registered office address was reported as 407 33rd Ave N, Minneapolis, MN. On or about February 6, 2023, the business was administratively terminated.

294. According to an undated invoice submitted to Hennepin County for 2021, Quarter 1, FMG assisted Sir's Cleaning Services with logo, business consulting, and business writings for 10 hours. Nasir El-Amin was listed as the business owner and the business address was listed as 407 33rd Ave N, Minneapolis, Minnesota. According to online Hennepin County property records, this address is a residential home.

295. On or about July 4, 2020, an EIDL loan application was submitted for King Fashions & Body Oils, a sole proprietorship owned by Nasir El-Amin and located at 407 33rd Ave N, Minneapolis, Minnesota. According to the application, the business opened on January 1, 2018, had 10 employees, and was in the retail industry. The gross revenues for 2019 were reported as \$160,000 and the cost of goods was \$900,000. An EIDL advance was approved for \$10,000. No registration with the Minnesota Secretary of State was found for this entity.

296. Law enforcement obtained bank records for Nasir from Wells Fargo. On or about July 7, 2020, \$10,000 was deposited from the SBA into Nasir's personal bank account at Wells Fargo. All of the subsequent withdrawals for the month of July were cash withdrawals as follows, July 8, 2020 for \$1,000, July 9, 2020 for \$1,000, July 13, 2020 for \$1,500, July 17, 2020 for \$4,500, and July 31, 2020 for \$2,000. The balance in the account prior to the loan deposit was approximately \$120.02.

297. According to IRS records, no tax return, individual or business were filed to report income from Sirs Cleaning Services for the years 2019-2021. In

addition, no Employers Quarterly Income tax returns (Form 941) were filed to report wages to employees.

298. Nasir El-Amin was born in 2001, making him only 18 years old when his company allegedly earned gross revenues of \$160,000.

9. Jordan Murschel and Murschel Outdoor Services

299. FMG billed Hennepin County for purportedly helping Jordan Murschel's company with services and a loan was also submitted for his company using an IP address linked to El-Amin Champion and **Subject Premises 2**.

300. According to online records, on or about October 25, 2020, Murschel Outdoor Services LLC was registered with the Minnesota Secretary of State. The registered agent was listed as Northwest Registered Agent LLC and the registered office address was listed as 202 N Cedar Ave, Ste. 1, Owatonna, Minnesota³. On or about February 4, 2022, the business was administratively terminated.

301. According to an undated invoice, submitted to Hennepin County for 2021, Quarter 1, FMG assisted Murschel Outdoor Services LLC with website, logo, business consulting, marketing, and advertising for 30 hours. Jordan Muschel was reported as the business owner and the business address was reported as **Subject Premises 2**, Suite 311.

302. On or about February 3, 2021, an SBA EIDL loan application was submitted for Murschel Outdoor Services. The business address was listed as 5633

³ This address appears to be a registered agent address.

W Bavarian Pass, Fridley, Minnesota and the owner was Jordan Murschel. The IP address used to submit the application was 50.237.67.70, the same address used by El-Amin Champion and Chaos Boxing, as described above, and is connected to **Subject Premises 2**. According to the Murschel Outdoor Services application, the business was opened on October 25, 2020 and had two employees. The 2020 gross revenues were \$85,000 and the cost of goods was \$25,200. This loan application was declined.

V. THE APRIL 26, 2023 SEARCH WARRANTS

303. On April 24, 2023, Magistrate Judge Elizabeth Cowan Wright signed federal search warrants authorizing the searches of **Subject Premises 1**, **Subject Premises 2**, and **Subject Premises 3**.

304. Agents executed the search warrants on April 26, 2023. Shortly after agents arrived to begin the search of **Subject Premises 2**, Tezzaree El-Amin Champion arrived at the scene. El-Amin Champion entered **Subject Premises 2**. IRS agents then identified themselves and explained that they were executing a search warrant. El-Amin Champion set a leather satchel on the floor of **Subject Premises 2**. The satchel contained an iPad and a laptop computer. Agents also seized two cell phones that El-Amin Champion had in his possession. El-Amin Champion objected and asserted that the cell phones and computer were his personal property.

305. This application seeks a warrant to search the two cell phones, iPad, and laptop computer (a/k/a the **Subject Devices**) that El-Amin Champion had in his possession and in his satchel at **Subject Premises 2** during the execution of the

search warrant. The Attachment B to the original search warrant authorizes us to search these items but we are seeking this second warrant in an abundance of caution and to obtain judicial authorization prior to our search of these devices.

306. Agents also searched **Subject Premises 3** on April 26, 2023. As explained above, **Subject Premises 3** is the current residence of El-Amin Champion. During the search, agents had a K-9 unit searching the house for media devices. While going through the master bedroom, the K9 showed a change of behavior at the front of the bed on the left side. Agents then found a loaded snub-nosed revolver under the bed, at the head of the bed on the left side. The gun was a Ruger LCR .357 revolver, bearing serial number 54608402.



307. Agents also found a business card belonging to Tezzaree El-Amin Champion in the master bedroom where the firearm was located. The business card identified El-Amin Champion as the Executive Director of Encouraging Leaders.



308. According to the agents conducting the search, the closet in the master bedroom in which the gun was found contained men's clothing. There was no indication that anyone else was living in the house with El-Amin Champion.

309. According to NCIC records, on or about June 14, 2018, El-Amin Champion was convicted of Second Degree Assault with a Dangerous Weapon in Hennepin County District Court. He was sentenced to 36 months in prison.

310. This application also seeks a warrant authorizing the seizure of the revolver found during the search of **Subject Premises 3**.

VI. COMPUTERS, ELECTRONIC STORAGE, AND FORENSIC ANALYSIS

311. Based upon my knowledge, training, experience, and the experience of other law enforcement personnel, I know that computer hardware and computer software may be utilized to store records which include, but are not limited to: those relating to business activities, criminal activities, associate names and addresses, victims' names, addresses, and images, the identity and location of assets illegally gained through criminal activity, and other information related to criminal activity.

312. As described above and in Attachment B, this application seeks permission to search for records that might be found at the Subject Premises, in

whatever form they are found. One form in which the records might be found is data stored on a computer's hard drive, cellular telephone, or other storage media. Thus, the warrant applied for would authorize the seizure of electronic storage media or, potentially, the copying of electronically stored information, all under Rule 41(e)(2)(B).

Probable Cause to Seize Electronic Devices at Subject Premises

313. I submit that if a computer, cellular telephone, or other storage medium is found on the Subject Premises, there is probable cause to believe those records will be stored on that computer or storage medium, for at least the following reasons:

a. Based on my knowledge, training, and experience, I know that computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files downloaded to a storage medium can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. This is so because when a person “deletes” a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the storage medium until it is overwritten by new data.

b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the storage medium that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer's operating system may also keep a record of deleted data in a “swap” or “recovery” file.

c. Wholly apart from user-generated files, computer storage media—in particular, computers’ internal hard drives—contain electronic evidence of how a computer has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory “swap” or paging files. Computer users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.

d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or “cache.”

e. Based on actual inspection of other evidence related to this investigation, including emails obtained through search warrants, I am aware that computer equipment was used to carry out this fraud scheme. There is reason to believe that there is a computer system currently located on the Subject Premises.

314. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only computer files that might serve as direct evidence of the crimes described on the warrant, but also for forensic electronic evidence that establishes how computers were used, the purpose of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on any storage medium in the Subject Premises because:

a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted

portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created, although this information can later be falsified.

b. As explained herein, information stored within a computer and other electronic storage media may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, information stored within a computer or storage media (e.g., registry information, communications, images and movies, transactional information, records of session times and durations, internet history, and anti-virus, spyware, and malware detection programs) can indicate who has used or controlled the computer or storage media. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. The existence or absence of anti-virus, spyware, and malware detection programs may indicate whether the computer

was remotely accessed, thus inculpatng or exculpating the computer owner. Further, computer and storage media activity can indicate how and when the computer or storage media was accessed or used. For example, as described herein, computers typically contain information that log: computer user account session times and durations, computer activity associated with user accounts, electronic storage media that connected with the computer, and the IP addresses through which the computer accessed networks and the internet. Such information allows investigators to understand the chronological context of computer or electronic storage media access, use, and events relating to the crime under investigation. Additionally, some information stored within a computer or electronic storage media may provide crucial evidence relating to the physical location of other evidence and the suspect. For example, images stored on a computer may both show a particular location and have geolocation information incorporated into its file data. Such file data typically also contains information indicating when the file or image was created. The existence of such image files, along with external device connection logs, may also indicate the presence of additional electronic storage media (e.g., a digital camera or cellular phone with an incorporated camera). The geographic and timeline information described herein may either inculcate or exculpate the computer user. Last, information stored within a computer may provide relevant insight into the computer user's state of mind as it relates to the offense under investigation. For example, information within the computer may indicate the owner's motive and intent to commit a crime (e.g., internet searches indicating criminal planning), or

consciousness of guilt (e.g., running a “wiping” program to destroy evidence on the computer or password protecting/encrypting such evidence in an effort to conceal it from law enforcement).

c. A person with appropriate familiarity with how a computer works can, after examining this forensic evidence in its proper context, draw conclusions about how computers were used, the purpose of their use, who used them, and when.

d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of forensic evidence on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. While it is possible to specify in advance the records to be sought, computer evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

315. I know that when an individual uses a computer to commit a crime, in this case, tax evasion and fraudulent tax returns, the individual’s computer will generally serve both as an instrumentality for committing the crime, and also as a storage medium for evidence of the crime. The computer is an instrumentality of the crime because it is used as a means of committing the criminal offense. The computer is also likely to be a storage medium for evidence of crime. From my training and experience, I believe that a computer used to commit a crime of this type may contain:

data that is evidence of how the computer was used; data that was sent or received; notes as to how the criminal conduct was achieved; records of Internet discussions about the crime; and other records that indicate the nature of the offense.

316. *Necessity of seizing or copying entire computers or storage media.* Based upon my knowledge, training and experience, and the experience of other law enforcement personnel, I know that in order to completely and accurately retrieve data maintained in computer hardware or on computer software, all computer equipment, should be processed by a qualified computer specialist in a laboratory or other competent setting. This is due to:

a. *The volume of evidence.* Computer storage devices (like hard disks, removable media, optical media, diskettes, tapes, laser disks, Bernoulli drives) can store the equivalent of millions of pages of information. Additionally, a suspect may try to conceal criminal evidence; he or she might store it in random order with deceptive file names, or use encryption or steganography software. This may require searching authorities to examine all the stored data to determine which particular files are evidence or instrumentalities of crime. This sorting process can take weeks or months, depending on the volume of data stored, and it would be impractical to attempt this kind of data search on site;

b. *The technical requirements.* Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it

is difficult to know before a search which expert is qualified to analyze a system and its data. In any event, however, data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to inadvertent or intentional modification or destruction (from external sources or destructive code imbedded in the system as a booby trap), a controlled environment is essential to its complete and accurate analysis. Further, when a user deletes a file on a computer, only the pointer (a tool that tells the operating system where the file is located on the media) to the file is deleted. The actual file may remain on the media for a long period of time, possibly years. Forensics examiners can use software tools that can locate and partially and/or fully recover deleted files;

c. *System functionality.* Computer systems are very complicated and the proper operation of the system may be dependent upon the hardware that is connected to it. For this reason, it is usually necessary to seize all hardware connected to the equipment in order to ensure the proper operation of the system during the analysis process.

d. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the device consistent with the warrant. The examination may require authorities to employ techniques, including, but not limited to computer-assisted scans of the

entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

317. The search warrant requests authorization to use the biometric unlock features of a device, based on the following, which I know from my training, experience, and review of publicly available materials:

a. Users may enable a biometric unlock function on some digital devices. To use this function, a user generally displays a physical feature, such as a fingerprint, face, or eye, and the device will automatically unlock if that physical feature matches one the user has stored on the device. To unlock a device enabled with a fingerprint unlock function, a user places one or more of the user's fingers on a device's fingerprint scanner for approximately one second. To unlock a device enabled with a facial, retina, or iris recognition function, the user holds the device in front of the user's face with the user's eyes open for approximately one second.

b. In some circumstances, a biometric unlock function will not unlock a device even if enabled, such as when a device has been restarted or inactive, has not been unlocked for a certain period of time (often 48 hours or less), or after a certain number of unsuccessful unlock attempts. Thus, the opportunity to use a biometric unlock function even on an enabled device may exist for only a short time. I do not know the passcodes of the devices likely to be found in the search.

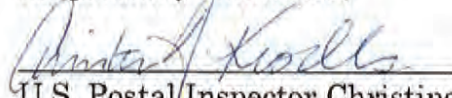
318. Thus, the warrant I am applying for would permit law enforcement personnel to, with respect to any device that appears to have a biometric sensor and falls within the scope of the warrant. As set forth above, the Subject Premises are

locations from which fraudulent companies are being run and where multiple individuals who, together, commit fraud together may be found. In my training and experience, I know that business locations often contain a variety of electronics, to include computers and cellular telephones. I further know that in this case, such electronic are being actively used to carry out the fraud scheme, to include being used to email lead leads and to make fraudulent phone calls to customers. Digital devices found at the Subject Premises may or may not have a clearly identifiable user based on the exterior of the device and/or may have multiple users whose biometric features may unlock the devices. Thus, if while executing the warrant, law enforcement personnel encounter a digital device within the scope of the warrant that may be unlocked using one of the aforementioned biometric features, the warrant I am applying for would permit law enforcement personnel to, with respect to every person who is located at the Subject Premises during the execution of the search: (1) depress the person's thumb- and/or fingers on the device(s); and (2) hold the device(s) in front of the face of the person with his or her eyes open to activate the facial-, iris-, and/or retina-recognition feature.

VII. CONCLUSION

319. Based on the facts set forth above, and based on my training, experience, knowledge, and the aforementioned facts of this investigation, there is probable cause to believe that the individuals and companies referenced herein have committed false and fraudulent claims, conspiracy, mail fraud, wire fraud, money laundering, and unlawful possession of a firearm, in violation of 18 U.S.C. §§ 287, 371, 1341, 1343, 1956/1957, and 922(g)(1), and there is probable cause to believe that that evidence and instrumentalities of those violations, as described in Attachment B, can be found in the Subject Email, as further described in Attachment A.

Respectfully submitted,



U.S. Postal Inspector Christine Kroells

SUBSCRIBED and SWORN before me by reliable
electronic means (FaceTime and email)
pursuant to Fed. R. Crim. P. 41(d)(3)



The Honorable Elizabeth Cowan Wright
United States Magistrate Judge

ATTACHMENT A-3
Location to Be Searched

Subject Premises 3 is the single-family home located at 14790 Jay Street NW, Andover, Minnesota 55304. 14790 Jay Street is located on the corner of Jay Street and 148th Avenue NW. The house has white siding and beige trim, with a maroon front door. There is a brown mailbox on the corner of the driveway in front of the house. There is a two-car garage attached to the house to the right of the front door. The numbers “14790” appear to the left of the garage door.





ATTACHMENT B
List of Items to be Seized

The items to be seized constitutes fruits, contraband, evidence and instrumentalities of violations of Title 18, United States Code, Section 922(g)(1) (felon in possession of a firearm) from January 1, 2020 through the present, including the loaded Ruger LCR, 357 magnum revolver, bearing serial number 54608402 and ammunition.