

FILED
6/4/2025

KSR

Judge Thomas M. Durkin
Magistrate Jeffrey T. Gilbert
RANDOM/CAT 3

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TANIKA ECHOLS a/k/a “Tia,” “Tanika
Davis,” ANTONIO ECHOLS, and
TAMIA THOMPSON DAVIS a/k/a
“Mia”

Case No.:

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

~~UNDER SEAL~~

COUNTS ONE THROUGH TWENTY

The SPECIAL APRIL 2024 GRAND JURY charges:

1. At times material to this indictment:

The Small Business Administration

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

The Paycheck Protection Program

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

c. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses and sole proprietors for job retention and certain other expenses, through a program called the Paycheck Protection Program (“PPP”). Congress subsequently authorized an additional \$465 billion in funding for PPP loans, for a total of about \$814 billion.

d. To obtain a PPP loan, a sole proprietor, self-employed individual, or business submitted a PPP loan application, which was signed by the applicant or an authorized representative of the business. The PPP loan application required the applicant to acknowledge the program rules and make certain affirmative certifications regarding the eligibility of the proprietorship, individual, or business. In the application, sole proprietors, self-employed individuals, and businesses were required to provide, among other things, their number of employees and average monthly payroll or gross income. These figures were used to calculate the applicant's eligibility and the amount of money the sole proprietor, self-employed individual, or business could receive under the PPP. Applicants were also required to make good faith certifications, including that the business entity was in operation on February 15, 2020, and that economic uncertainties had necessitated their loan requests for continued business operations.

e. PPP loan proceeds were required to be used by the sole proprietorship, self-employed individual, or business for certain permissible expenses: payroll costs, interest on mortgages, rent, utilities, and a limited amount of income paid to the owner. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven by the SBA if the sole proprietorship, self-employed individual, or business spent the loan proceeds on these items within a designated period of time and used at least a certain percentage of the PPP loan for payroll expenses.

f. To gain access to funds through the PPP, sole proprietorships, self-employed individuals, and businesses applied to lenders participating in the PPP and, if approved, received the loans from those lenders, either directly or through loan service providers.

g. Businesses, sole proprietors, and self-employed individuals that obtained PPP loans and used the full loan amount were allowed to obtain additional funds through the PPP by submitting a Second Draw Borrower Application Form (“Second Draw Application”), which was signed by the applicant or an authorized representative of the business. The Second Draw Application required the applicants to again acknowledge the program rules and make certain affirmative certifications regarding the eligibility of the business, and again provide their number of employees and average monthly payroll or gross income. These figures were again used to calculate the applicant’s eligibility and the amount of money the business could receive under the PPP. Applicants were again required to make good faith certifications, including that economic uncertainties had necessitated their loan requests for continued business operations and that the applicants had used the full amount of the initial PPP loan only for eligible expenses.

h. Participating lenders, loan service providers, and the SBA required applicants for PPP loans to provide truthful information about the sole proprietorship, self-employed individual, or business and its owner, including truthful information about the applicant’s social security number, payroll, income, operating expenses, and how the PPP loan would be used, which information was

material to (i) lenders' approval, terms, and funding of loans and (ii) the SBA's decision to guarantee and forgive the loans.

The Economic Injury Disaster Loan Program

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

j. To gain access to funds through the EIDL Program, small businesses applied through the SBA via an online portal and application. As part of the EIDL application process, the SBA required applicants to submit truthful information about the applying entity, its owner, and its financial condition prior to the COVID-19 pandemic. This information included the entity's number of employees as of January 31, 2020; the entity's gross revenues and cost of goods sold for the 12-month period prior to January 31, 2020; and the entity's type of business (i.e., a business, an agricultural business, a sole proprietorship, a cooperative, among others); the date on which the business opened; and the date on which the current owner assumed ownership of the entity. Applicants were required to electronically certify that the information provided in the application was true and correct and were warned that a false statement or misrepresentation to the SBA may result in sanctions, including criminal penalties.

k. The SBA required applicants for EIDL loans to provide truthful information about the sole proprietorship, self-employed individual, or business and its owner, including truthful information about the applicant's number of employees, costs of goods sold, and gross revenues, which information was material to the SBA's approval, terms, and funding of loans.

l. EIDL funds were issued to small-business applicants directly from the United States Treasury.

m. EIDL Advance was a grant program offered together with the EIDL Program. EIDL Advance was designed to provide emergency economic relief to businesses that were experiencing a temporary loss of revenue as a result of the COVID-19 pandemic. The applicant could request consideration for an EIDL advance in an application for an EIDL loan. The amount of the advance issued to the small-business applicant was determined by the number of employees indicated on the EIDL application, at \$1,000 per employee, up to \$10,000. The number of employees reported by the business was material to the SBA's funding of an EIDL Advance and determination of the amount of the EIDL Advance. If an EIDL advance was issued, the advance did not need to be repaid.

n. If an EIDL application was approved by the SBA, the amount of the EIDL loan was determined in part based on the statements in the EIDL application about the entity's revenues and cost of goods sold for the 12 months prior to January 31, 2020.

o. EIDL Program funds could be used to pay for the ordinary operating expenses and debts of the entity, including payroll, sick leave, production costs, utilities, rent, mortgage payments, continuation of health care benefits, and fixed debt payments.

Entities

p. ESURE HAULING, LLC was an Illinois company between 2016 and 2022, when it was dissolved. ESURE HAULING, LLC's owner and registered agent was defendant TANIKA ECHOLS, using the name "Tanika Davis" and "Tanika Davis-Echols," at 9928 S. Lafayette St., Chicago, Illinois.

q. 424 HOME REMODELING, INC. was an Illinois company between 2015 and 2022, when it was dissolved. 424 HOME REMODELING, INC.'s owner and registered agent was defendant ANTONIO ECHOLS at 9928 S. Lafayette St, Chicago, Illinois.

r. BLOCK 424 ENTERTAINMENT, LLC was an Illinois company between 2012 and 2022, when it was dissolved. BLOCK 424 ENTERTAINMENT, LLC's registered agent was defendant ANTONIO ECHOLS and its managers were defendants ANTONIO ECHOLS and TANIKA ECHOLS at 9928 S. Lafayette St, Chicago, Illinois.

s. 424 ENTERTAINMENT, LLC was an Illinois company registered between 2008 and 2010, when it was dissolved. 424 ENTERTAINMENT, LLC's registered agent was defendant TANIKA ECHOLS and its managers were

defendants ANTONIO ECHOLS and TANIKA ECHOLS at 9928 S. Lafayette St, Chicago, Illinois.

Defendants

t. TANIKA ECHOLS was a resident of South Holland, Illinois, and Austin, Texas. TANIKA ECHOLS was the owner and registered agent of ESURE HAULING, LLC and 424 ENTERTAINMENT, LLC.

u. ANTONIO ECHOLS was an Amtrak employee and a resident of South Holland, Illinois, and later, Austin, Texas. ANTONIO ECHOLS was the owner and registered agent of 424 HOME REMODELING, INC. and BLOCK 424 ENTERTAINMENT, LLC.

v. TAMIA THOMPSON-DAVIS resided in Chicago, Illinois.

Lenders

w. Lender A was a financial technology company that processed PPP loan applications and funded PPP loans to approved borrowers. Lender A maintained computer servers that were located outside of Illinois.

x. Lender B was a financial technology company that processed PPP loan applications and funded PPP loans to approved borrowers. Lender B maintained computer servers that were located outside of Illinois.

y. Lender C was a financial technology company that processed PPP loan applications and funded PPP loans to approved borrowers. Lender C maintained computer servers that were located outside of Illinois.

The Scheme to Defraud

2. Beginning no later than in or around June 2020, and continuing until at least in or around February 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

TANIKA ECHOLS a/k/a “Tia” and “Tanika Davis,”
ANTONIO ECHOLS,
and TAMIA THOMPSON-DAVIS a/k/a “Mia”

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

3. It was part of the scheme that TANIKA ECHOLS, ANTONIO ECHOLS, and TAMIA THOMPSON-DAVIS (together, the “defendants”), for the purpose of fraudulently obtaining over \$2 million in PPP and EIDL funds, submitted over 100 applications for loans and advances under PPP and EIDL Programs, on behalf of defendants themselves, Individuals A through G, ESURE HAULING, LLC, 424 HOME REMODELING, INC., and others; which applications and supporting documentation contained materially false statements and misrepresentations concerning, among other things, the purported entities’ number of employees, gross income, gross revenues, payroll, cost of goods sold, operating expenses, type of business, and existence as companies with ongoing operations.

The PPP Loans

4. It was further part of the scheme that TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON-DAVIS prepared and submitted, and caused to be prepared and submitted, to Lenders A through C (“Lenders”), false and fraudulent PPP loan applications on behalf of numerous individuals (“clients”), in exchange for payments from the clients of approximately \$2,000 or more per successful loan application.

5. It was further part of the scheme that, in these applications, the defendants falsely and fraudulently represented that their clients were sole proprietors who employed a specified number of employees, paid a specified average monthly payroll, and were in operation on February 15, 2020. The defendants knew at the time that those representations were false.

6. It was further part of the scheme that, to substantiate the claimed occupations, number of employees, and payroll of their clients, TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON-DAVIS prepared and submitted, and caused to be prepared and submitted, to the Lenders, falsified IRS Forms 1040, Schedules C, which falsely represented their clients’ principal businesses and professions, yearly net profits, and total expenses.

7. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan applications on behalf of their clients, TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON-DAVIS caused Lenders A through C to disburse at least approximately \$1.7 million in PPP funds to their clients, which

funds TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON-DAVIS knew that their clients were not entitled to receive.

8. It was further part of the scheme that, after their clients received PPP funds, each client transferred approximately \$4,000 to TANIKA ECHOLS, ANTONIO ECHOLS, or THOMPSON-DAVIS in exchange for their preparation and submission of the fraudulent loan applications and fraudulent forgiveness forms.

9. It was further part of the scheme that TANIKA ECHOLS and TAMIA THOMPSON-DAVIS also prepared and submitted, and caused to be prepared and submitted, PPP loan applications on behalf of themselves to the Lenders, in which applications the defendants falsely and fraudulently represented that they were sole proprietors who employed a specified number of employees, paid a specified average monthly payroll, and were in operation on February 15, 2020, and that all PPP loan proceeds would be used only for business related purposes. The defendants knew at the time that those representations were false.

10. It was further part of the scheme that TANIKA ECHOLS prepared and submitted, and caused to be prepared and submitted, PPP loan applications where she falsely listed as her social security number a number other than the one assigned to her by the Social Security Administration.

11. It was further part of the scheme that, to substantiate the claimed occupations, number of employees, and payroll in their PPP applications, TANIKA ECHOLS and TAMIA THOMPSON DAVIS prepared and submitted, and caused to be prepared and submitted, to the Lenders, falsified Schedule C tax forms, which

falsely represented their principal businesses and professions, yearly net profits, and total expenses.

12. It was further part of the scheme that, through the submission of their own false and fraudulent PPP loan applications, TANIKA ECHOLS and THOMPSON-DAVIS caused the Lenders to disburse approximately \$128,983 in PPP loan proceeds into bank accounts that they controlled.

13. It was further part of the scheme that, after the PPP loans were disbursed, in order to fraudulently obtain forgiveness of the PPP loans they obtained for themselves and on behalf of their clients, TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON-DAVIS submitted and caused to be submitted to the SBA or to the Lenders, loan forgiveness applications, knowing that the forgiveness applications contained false and fraudulent representations regarding the payroll costs for the purported sole proprietorships in the PPP applications and the truthfulness and accuracy of the loan application and supporting documents.

The EIDL Loans

14. It was further part of the scheme that TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON-DAVIS prepared and submitted, and caused to be prepared and submitted, numerous applications for EIDL loans and advances to the SBA, seeking over \$500,000 on behalf of several of entities, including ESURE HAULING, LLC and 424 HOME REMODELING, INC., both for their own benefit, and on behalf of their clients in exchange for approximately \$2,000 or more per successful EIDL application.

15. It was further part of the scheme that, TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON DAVIS made false statements in the EIDL applications they submitted and caused to be submitted, regarding the dates on which those entities opened for business, the entities' gross revenues and costs of goods sold for the 12 months prior to January 31, 2020, and the number of employees employed by those entities as of January 31, 2020. The defendants knew at the time that their own entities did not have the number of employees specified and did not have the revenues or cost of goods sold as stated in the applications. The defendants also knew at the time that the representations were false.

16. It was further part of the scheme that, through the submission of the false and fraudulent EIDL loan applications, TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON DAVIS caused the SBA to disburse approximately \$307,000 in in EIDL loan proceeds and advances into bank accounts that they or their clients controlled.

17. It was further part of the scheme that, after their clients received EIDL funds, the clients each transferred approximately \$2,000 to TANIKA ECHOLS, ANTONIO ECHOLS, or THOMPSON-DAVIS in exchange for their preparation and submission of the fraudulent applications.

Disposition of Loan Proceeds

18. It was further part of the scheme that TANIKA ECHOLS and ANTONIO ECHOLS, and THOMPSON-DAVIS directed their clients to transfer the funds paid in exchange for the preparation and submission of fraudulent loan

applications to various bank accounts, including bank accounts in the name of ESURE HAULING, LLC and BLOCK 424 ENTERTAINMENT, LLC, which bank accounts TANIKA ECHOLS and ANTONIO ECHOLS controlled.

19. It was further part of the scheme that TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON DAVIS used the vast majority of the funds obtained through their submission of fraudulent PPP and EIDL applications and payments from their clients in return for submitting PPP and EIDL applications to make cash withdrawals, to purchase goods and services, to deposit money into personal investment accounts, to make mortgage payments, and to transfer funds to each other and others, including for their personal use and benefit and not for purposes related to the business of the entities.

20. It was further part of the scheme that TANIKA ECHOLS, ANTONIO ECHOLS, and THOMPSON DAVIS misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

21. On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants, as set forth below, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, listed below, each such writing, sign, and signal constituting a separate count:

COUNT	DEFENDANT	DATE	WRITING, SIGN, AND SIGNAL
One	TAMIA THOMPSON DAVIS	June 18, 2020	an internet transmission of an EIDL loan application on behalf of “Tamia Thompson-Davis” through an SBA server located outside of Illinois
Two	TANIKA ECHOLS	June 20, 2020	an internet transmission of an EIDL loan application on behalf of “Echols” through an SBA server located outside of Illinois
Three	ANTONIO ECHOLS	June 20, 2020	an internet transmission of an EIDL loan application on behalf of “Echols” through an SBA server located outside of Illinois
Four	ANTONIO ECHOLS	June 23, 2020	an internet transmission of an EIDL loan application on behalf of Individual A through an SBA server located outside of Illinois
Five	TANIKA ECHOLS	June 29, 2020	an internet transmission of an EIDL loan application on behalf of “ESure Hauling” through an SBA server located outside of Illinois
Six	ANTONIO ECHOLS	July 2, 2020	an internet transmission of an EIDL loan application on behalf of “424 Home Remodeling, Inc.” through an SBA server located outside of Illinois
Seven	TANIKA ECHOLS	September 25, 2020	an internet transmission of an EIDL loan application on behalf of “ESure Hauling” through an SBA server located outside of Illinois
Eight	TANIKA ECHOLS	January 7, 2021	an internet transmission of an EIDL loan application on behalf of “Tanika Echols” through an SBA server located outside of Illinois

COUNT	DEFENDANT	DATE	WRITING, SIGN, AND SIGNAL
Nine	TANIKA ECHOLS	February 18, 2021	an internet transmission of a PPP loan application on behalf of TANIKA ECHOLS to Lender A computer servers located outside of Illinois
Ten	TAMIA THOMPSON DAVIS	February 24, 2021	an internet transmission of a PPP loan application on behalf of TAMIA THOMPSON DAVIS to Lender A computer servers located outside of Illinois
Eleven	TANIKA ECHOLS	March 23, 2021	an internet transmission of a PPP loan application on behalf of Individual B to Lender B computer servers located outside of Illinois
Twelve	TANIKA ECHOLS	March 26, 2021	an internet transmission of a PPP loan application on behalf of Individual C to Lender A computer servers located outside of Illinois
Thirteen	TAMIA THOMPSON DAVIS	March 27, 2021	an internet transmission of a PPP loan application on behalf of Individual D to Lender A computer servers located outside of Illinois
Fourteen	TANIKA ECHOLS	April 6, 2022	an internet transmission of a PPP loan application on behalf of Individual E to Lender A computer servers located outside of Illinois
Fifteen	TANIKA ECHOLS	April 8, 2021	an internet transmission of a PPP loan application on behalf of Individual F to Lender A computer servers located outside of Illinois
Sixteen	TANIKA ECHOLS	April 13, 2021	an internet transmission of a PPP loan application on behalf of TANIKA ECHOLS to Lender C computer servers located outside of Illinois

COUNT	DEFENDANT	DATE	WRITING, SIGN, AND SIGNAL
Seventeen	TANIKA ECHOLS	April 16, 2021	an internet transmission of a PPP loan application on behalf of TANIKA ECHOLS to Lender C computer servers located outside of Illinois
Eighteen	TANIKA ECHOLS	April 20, 2021	an internet transmission of a PPP loan application on behalf of TANIKA ECHOLS to Lender A computer servers located outside of Illinois
Nineteen	TANIKA ECHOLS	April 21, 2021	an internet transmission of a PPP loan application on behalf of Individual G to Lender A computer servers located outside of Illinois
Twenty	TAMIA THOMPSON DAVIS	April 28, 2021	an internet transmission of a PPP loan application for TAMIA THOMPSON DAVIS to Lender A's computer servers located outside of Illinois

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

COUNT TWENTY-ONE

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. On or about April 19, 2021, in the Northern District of Illinois, and elsewhere,

TANIKA ECHOLS a/k/a “Tia” a/k/a “Tanika Davis”

defendant herein, knowingly engaged in a monetary transaction in and affecting interstate commerce in criminally derived property of a value greater than \$10,000, namely the wiring of \$30,000 from an account in the name of ESURE HAULING LLC at Chase Bank ending in 6972 to an account in her name at Chase Bank ending in 7981, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

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

COUNT TWENTY-TWO

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. On or about April 20, 2021, in the Northern District of Illinois, and elsewhere,

TANIKA ECHOLS a/k/a “Tia” a/k/a “Tanika Davis”

defendant herein, knowingly engaged in a monetary transaction in and affecting interstate commerce in criminally derived property of a value greater than \$10,000, namely the wiring of \$25,000 from an account in her name at Chase Bank ending in 7981 to an account in her name at Robinhood ending in 3735, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

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

COUNT TWENTY-THREE

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. On or about May 17, 2021, in the Northern District of Illinois, and elsewhere,

TANIKA ECHOLS a/k/a “Tia” a/k/a “Tanika Davis”

defendant herein, knowingly engaged in a monetary transaction in and affecting interstate commerce in criminally derived property of a value greater than \$10,000, namely the wiring of \$15,000 from an account in her name at Chase Bank ending in 7981 to an account in the name of ESURE HAULING LLC at Chase Bank ending in 6972, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

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

COUNT TWENTY-FOUR

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. On or about November 10, 2021, in the Northern District of Illinois, and elsewhere,

TANIKA ECHOLS a/k/a “Tia” a/k/a “Tanika Davis”

defendant herein, knowingly engaged in a monetary transaction in and affecting interstate commerce in criminally derived property of a value greater than \$10,000, namely the wiring of \$15,000 from an account in her name at Chase Bank ending in 7981 to an account in the name of ESURE HAULING LLC at Chase Bank ending in 6972, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

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

COUNT TWENTY-FIVE

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. On or about November 12, 2021, in the Northern District of Illinois, and elsewhere,

TANIKA ECHOLS a/k/a “Tia” a/k/a “Tanika Davis”

defendant herein, knowingly engaged in a monetary transaction in and affecting interstate commerce in criminally derived property of a value greater than \$10,000, namely the wiring of \$67,000 from an account in the name ESURE HAULING LLC at Chase Bank ending in 6972 to an account in her name at Chase Bank ending in 5833, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

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

COUNT TWENTY-SIX

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. On or about November 15, 2021, in the Northern District of Illinois, and elsewhere,

TANIKA ECHOLS a/k/a “Tia” a/k/a “Tanika Davis”

defendant herein, knowingly engaged in a monetary transaction in and affecting interstate commerce in criminally derived property of a value greater than \$10,000, namely the wiring of \$50,000 from an account in her name at Chase Bank ending in 5833 to an account in her name at Robinhood ending in 3735, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

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

COUNT TWENTY-SEVEN

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. On or about November 16, 2021, in the Northern District of Illinois, and elsewhere,

TANIKA ECHOLS a/k/a “Tia” a/k/a “Tanika Davis”

defendant herein, knowingly engaged in a monetary transaction in and affecting interstate commerce in criminally derived property of a value greater than \$10,000, namely the wiring of \$17,000 from an account in her name at Chase Bank ending in 5833 to an account in her name at Robinhood ending in 3735, such property having been derived from a specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343;

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

FORFEITURE ALLEGATION

The SPECIAL APRIL 2024 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this Indictment, defendants shall forfeit to the United States of America any property that constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1957), as set forth in this Indictment, defendants shall forfeit to the United States of America, any property involved in such offense, and any property traceable to such property, as provided in 18 USC § 982(a)(1).

3. The property to be forfeited includes, but is not limited to:

- a. a personal money judgment in an amount equal to the proceeds derived from the offense in violation of Title 18, United States Code, Section 1343 and/or property involved in the offense in violation of Title 18, United States Code, Section 1957;
- b. the following specific property:
 - i. a \$3,400 mink jacket from Andriana Furs;
 - ii. a \$1,600 gray rabbit from Andriana Furs;
 - iii. a \$1,100 Diamond Design Mink Jacket with a fox collar from Andriana Furs.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Michelle Petersen on behalf of the
UNITED STATES ATTORNEY