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

JUDGE HARJANI
MAGISTRATE JUDGE KIM
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1:25-CR-00354

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DEXTER M. CRAWFORD, JR.,
TIMIKA ROYSTON,
ORLANDO PATRICK, and
JERMIE MILLER,

No.

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

UNDER SEAL

COUNTS ONE THROUGH NINE

The SPECIAL JUNE 2024 GRAND JURY charges that:

1. At times material to this indictment:

Individuals and Entities

a. Defendant DEXTER M. CRAWFORD, JR. was a resident of Woodbridge, Illinois, and was the president and owner of Agnize Incorporated, a corporation incorporated under the laws of Illinois on or around September 25, 2014; and was a manager of P & C Auto Group, LLC ("P&C Auto"), a limited liability company formed under the laws of Illinois on or around June 22, 2016; and was a manager of Prestigious Rental, LLC ("Prestigious Rental"), a limited liability company formed under the laws of Illinois on or around May 26, 2016; and was a president and owner of Annie B's Bakery, Inc. ("Annie B's Bakery"), a corporation incorporated under the laws of Illinois on or around December 8, 2003; and was the president and owner of Benevento Holdings Corp. ("Benevento Holdings"), a corporation incorporated under the laws of Illinois on or around January 8, 2018; and

was the manager, chief financial officer, and owner of Dexcorp Consulting LLC (“Dexcorp Consulting”), a limited liability company formed under the laws of Colorado on or around August 17, 2008.

b. Defendant TIMIKA ROYSTON was a resident of Chicago, Illinois, and was the owner and president of THR Lifestyle Consultants, Inc. (“THR Lifestyle”), a corporation incorporated under the laws of Illinois on or around August 18, 2015.

c. Defendant ORLANDO PATRICK was a resident of Chicago, Illinois, and was the president and owner of Patrick Capital Group, Inc. (“Patrick Capital Group”), a corporation incorporated under the laws of Illinois on or around January 31, 2011, and was the organizer of Patrick Development Group, LLC (“Patrick Development”), a limited liability company organized under the laws of Missouri on or around June 9, 2010; and was a manager of P & C Auto.

d. Defendant JERMIE MILLER was a resident of Plainfield, Illinois, and was the owner and manager of M-Fast LLC (“M-Fast”), a limited liability company formed under the laws of Illinois on or around July 3, 2019.

e. Certoza Solutions LLC (“Certoza Solutions”) was a limited liability company formed under the laws of Illinois on or around January 2, 2018.

The Small Business Administration

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

The Paycheck Protection Program

g. 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.

h. 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.

i. To obtain a PPP loan, a business, sole proprietor, or self-employed individual submitted a PPP loan application, which was signed by the applicant or an authorized representative of the business. The PPP loan application required the applicants to acknowledge the program rules and make certain affirmative certifications regarding the eligibility of the business, proprietorship, or individual. In the application, businesses, sole proprietors, and self-employed individuals were required to provide, among other things, their number of employees and average

monthly payroll. This figure was used to calculate the applicant's eligibility and the amount of money the business could receive under the PPP. Applicants were also required to make good faith certifications, including that that the business entity was in operation on February 15, 2020, and that economic uncertainties had necessitated their loan requests for continued business operations.

j. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven by the SBA if the business, sole proprietorship, or self-employed individual spent the loan proceeds on certain expenses within a designated period of time and used at least a certain percentage of the PPP loan for payroll expenses.

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

l. 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. 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.

m. 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 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 to forgive the loans.

The Economic Injury Disaster Loan Program

n. 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.

o. 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.

p. 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.

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

r. 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. 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. If an EIDL advance was issued, the advance did not need to be repaid.

s. If an EIDL application was approved by the SBA, the amount of the EIDL 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.

t. EIDL Program loan 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.

Financial Institutions and Lenders

u. American Airlines Credit Union (“AACU”) was a financial institution with a branch in Chicago, Illinois, the deposit accounts of which were insured by the National Credit Union Administration Board.

v. Bank of America was a financial institution with branches in Chicago, Illinois, the deposit accounts of which were insured by the Federal Deposit Insurance Corporation.

w. BMO Harris Bank was a financial institution which funded PPP loans to approved borrowers. The deposit accounts of BMO Harris Bank were insured by the Federal Deposit Insurance Corporation.

x. Capital One Bank (“Capital One”) was a financial institution with branches in Chicago, Illinois, the deposit accounts of which were insured by the Federal Deposit Insurance Corporation.

y. Customers Bank was a financial institution which funded PPP loans to approved borrowers. The deposit accounts of Customers Bank were insured by the Federal Deposit Insurance Corporation.

z. International Bank of Chicago (“IBOC”) was a financial institution with branches in Chicago, Illinois, the deposit accounts of which were insured by the Federal Deposit Insurance Corporation.

aa. Kabbage, Inc. was an approved SBA non-bank lender that offered PPP loans directly and also facilitated loans on behalf of Cross River Bank.

bb. Lakeside Bank was a financial institution with branches in Chicago, Illinois, the deposit accounts of which were insured by the Federal Deposit Insurance Corporation.

cc. Navy Federal Credit Union (“NFCU”) was a financial institution, the deposit accounts of which were insured by the National Credit Union Administration Board.

dd. JPMorgan Chase Bank, N.A. (“Chase Bank”) was a financial institution with branches in Chicago, Illinois, the deposit accounts of which were insured by the Federal Deposit Insurance Corporation.

ee. U.S. Bank was a financial institution with branches in Chicago, Illinois, the deposit accounts of which were insured by the Federal Deposit Insurance Corporation.

Electronic Signatures

ff. DocuSign was an electronic signature and document management platform that allowed users to send and electronically sign documents using a computer or other electronic device.

The Scheme to Defraud

2. Beginning in or around April 2020 and continuing through in or around August 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEXTER M. CRAWFORD, JR.,
TIMIKA ROYSTON
ORLANDO PATRICK, and
JERMIE MILLER

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 loans submitted to lenders, and EIDLs submitted to the SBA, by means of materially false and fraudulent pretenses, representations, and promises, which scheme affected a financial institution, as further described below.

3. It was part of the scheme that CRAWFORD, for the purpose of fraudulently obtaining and attempting to obtain PPP and EIDL funds, submitted applications for loans and advances under the PPP and EIDL program on behalf of entities that he controlled, and he assisted others, including ROYSTON, PATRICK, and MILLER in fraudulently obtaining and attempting to obtain PPP and EIDL funds through applications for loans and advances under the PPP and EIDL program on behalf of entities that they controlled, which applications contained materially false statements and misrepresentations concerning, among other things, the entities' number of employees, gross income, gross revenues, payroll, cost of goods

sold, and operating expenses.

4. It was part of the scheme that CRAWFORD and ROYSTON, for the purpose of fraudulently obtaining approximately \$496,525 in PPP loan and EIDL funds, submitted and caused to be submitted not fewer than four applications for loans and advances under the PPP and EIDL Programs, on behalf of THR Lifestyle Consultants and Certoza Solutions, which applications contained materially false statements and misrepresentations concerning, among other things, the entities' number of employees, gross income, gross revenues, payroll, cost of goods sold, and operating expenses.

5. It was part of the scheme that CRAWFORD and PATRICK, for the purpose of fraudulently obtaining approximately \$860,823 in PPP loan funds, submitted and caused to be submitted not fewer than two applications for loans under the PPP Program, on behalf of Patrick Capital Group and Patrick Development, which applications contained materially false statements and misrepresentations concerning, among other things, the entities' number of employees and average monthly payroll.

6. It was part of the scheme that CRAWFORD and MILLER, for the purpose of fraudulently obtaining approximately \$633,796 in PPP loan funds, submitted and caused to be submitted an application for a loan under the PPP Program on behalf of M-Fast, which application contained materially false

statements and misrepresentations concerning, among other things, the entity's number of employees and average monthly payroll.

7. It was part of the scheme that CRAWFORD, for the purpose of fraudulently obtaining approximately \$833,222 in PPP loan and EIDL funds, and attempting to obtain a further EIDL funds, submitted and caused to be submitted not fewer than eight applications for loans and advances under the PPP and EIDL Programs, on behalf of Prestigious Rental, Annie B's Bakery, Benevento Holdings, Agnize, Dexcorp Consulting, and P&C Auto, which applications contained materially false statements and misrepresentations concerning, among other things, the entities' number of employees, gross income, gross revenues, payroll, cost of goods sold, and operating expenses.

THR Lifestyle First Draw PPP Loan

8. It was further part of the scheme that on or around May 5, 2020, CRAWFORD and ROYSTON submitted and caused to be submitted to BMO Harris Bank a PPP loan application on behalf of THR Lifestyle in the amount of \$88,362.50, knowing that the application contained false and fraudulent representations regarding: (a) THR Lifestyle's number of employees; (b) THR Lifestyle's average monthly payroll; and (c) the truthfulness and accuracy of the application and supporting documents.

9. It was further part of the scheme that, in order to obtain a PPP loan,

CRAWFORD and ROYSTON prepared and submitted to BMO Harris Bank a PPP loan application for THR Lifestyle which falsely represented that THR Lifestyle had six employees with an average monthly payroll of \$35,345, and submitted a fraudulent Form 1120 tax return for the tax year 2018 that falsely represented that THR Lifestyle had paid wages and salaries of \$424,150.

10. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application, CRAWFORD and ROYSTON caused BMO Harris Bank to disburse a PPP loan in the amount of \$88,362.50 into an account at BMO Harris Bank ending in 0325 (“BMO 0325 Account”) controlled by ROYSTON, when, as CRAWFORD and ROYSTON knew, neither they nor THR Lifestyle were entitled to the PPP loan funds.

Prestigious Rental EIDL

11. It was further part of the scheme that on or about June 16, 2020, CRAWFORD submitted and caused to be submitted to the SBA an EIDL application on behalf of Prestigious Rental seeking a loan and advance, knowing that the application contained false and fraudulent representations regarding (a) Prestigious Rental’s number of employees; (b) Prestigious Rental’s gross receipts and costs of goods sold; (c) Prestigious Rental’s lost rents; and (d) the truthfulness and accuracy of the application.

12. It was further part of the scheme that in order to obtain the EIDL and

advance, CRAWFORD prepared the loan application falsely representing that for the 12 months ending January 1, 2020, Prestigious Rental had Gross Revenues of \$1,437,354, Cost of Goods of \$192,887, and 92 employees as of that date, and CRAWFORD certified in the Loan Authorization and Agreement that all representations in the loan application were true, correct, and complete.

13. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, CRAWFORD caused the SBA to disburse a loan and advance totaling \$159,900 into an account ending in 5815 that CRAWFORD maintained and controlled at AACU (the “AACU 5815 Account”), when, as CRAWFORD knew, neither he nor Prestigious Rental was entitled to the EIDL funds.

EIDL Applications file for Annie B’s Bakery, Benevento Holdings Corp., Agnize Incorporated, Dexcorp Consulting, and P&C Auto

14. It was further part of the scheme that on or about June 17, 2020, CRAWFORD submitted and caused to be submitted to the SBA EIDL applications on behalf of Annie B’s Bakery, Benevento Holdings Corp., Agnize Incorporated, Dexcorp Consulting, and P&C Auto, seeking a loan and advance for each of the entities, knowing that each application contained false and fraudulent representations regarding (a) the entity’s number of employees; (b) the entity’s gross receipts and costs of goods sold; and (c) the truthfulness and accuracy of the application.

15. It was further part of the scheme that, through the submission of the false and fraudulent EIDL applications on behalf of Annie B’s Bakery, Benevento

Holdings Corp., Agnize Incorporated, Dexcorp Consulting, and P&C Auto, CRAWFORD attempted to cause the SBA to approve a loan and advance for each entity, when, as CRAWFORD knew, neither he nor any of the entity applicants were entitled to the EIDL funds.

16. It was further part of the scheme that, after the SBA denied the EIDL applications filed on behalf of Annie B's Bakery, Benevento Holdings Corp., Agnize Incorporated, Dexcorp Consulting, and P&C Auto, CRAWFORD contacted the SBA and sought reconsideration of SBA's denial of the EIDL applications.

17. It was further part of the scheme that, on or around August 15, 2020, CRAWFORD contacted Individual B and requested that Individual B prepare a fraudulent 2019 Form 1120 tax returns for Annie B's Bakery, Benevento Holdings Corp., Agnize Incorporated, Dexcorp Consulting, and P&C Auto, reflecting false revenues that were not realized and expenses that were not incurred, and Individual B thereafter prepared the fraudulent return and delivered them to CRAWFORD who, in turn, submitted the fraudulent 2019 Form 1120 tax returns to the SBA in an attempt to cause the SBA to approve a loan and advance for each of the applicant entities.

THR Lifestyle EIDL

18. It was further part of the scheme that on or about June 19, 2020, CRAWFORD and ROYSTON submitted and caused to be submitted to the SBA an

EIDL application on behalf of THR Lifestyle, knowing that the application contained false and fraudulent representations regarding (a) THR Lifestyle's number of employees; (b) THR Lifestyle's gross receipts and costs of goods sold; and (c) the truthfulness and accuracy of the application.

19. It was further part of the scheme that in order to obtain the EIDL and advance, CRAWFORD prepared the loan application falsely representing that for the 12 months ending January 1, 2020, THR Lifestyle had Gross Receipts of \$1,473,893, Cost of Goods of \$673,920, and 38 employees as of that date, and ROYSTON certified in the Loan Authorization and Agreement that all representations in the loan application were true, correct, and complete.

20. It was further part of the scheme that on or around June 26, 2020, ROYSTON advised CRAWFORD that she had spoken with an SBA employee and learned that the application had not been approved because it listed the AACU 5815 Account which was tied to multiple other entities' applications. ROYSTON falsely told the SBA that her husband mistakenly listed the account when helping her to complete the EIDL application.

21. It was further part of the scheme that, on or around, July 6, 2020, CRAWFORD caused ROYSTON to be added as a joint owner of the AACU 5815 Account.

22. It was further part of the scheme that, through the submission of the

false and fraudulent EIDL application, CRAWFORD and ROYSTON caused the SBA to disburse a loan and advance totaling \$159,900 into AACU 5815 Account, when, as CRAWFORD and ROYSTON knew, neither they nor THR Lifestyle were entitled to the EIDL funds.

Patrick Capital Group First Draw PPP Loan

23. It was further part of the scheme that on or around June 25, 2020, PATRICK submitted and caused to be submitted to Kabbage a PPP loan application on behalf of Patrick Capital Group in the amount of \$187,501, knowing that the application contained false and fraudulent representations regarding: (a) Patrick Capital Group's number of employees; (b) Patrick Capital Group's average monthly payroll; and (c) the truthfulness and accuracy of the application and supporting documents.

24. It was further part of the scheme that, in order to obtain a PPP loan, PATRICK prepared and submitted to Kabbage a PPP loan application for Patrick Capital Group which falsely represented that Patrick Capital Group had 12 employees with an average monthly payroll of \$75,001, and submitted a fraudulent Form W-3 for Patrick Capital Group, which falsely reported that Patrick Capital Group had issued 12 Forms W-2 for 2019 reflecting total wages of \$900,000 paid that year.

25. It was further part of the scheme that PATRICK informed CRAWFORD

as to the submission of the PPP loan application for Patrick Capital Group, and the identity of the account into which the proceeds were to be disbursed, in an attempt to evade detection by using a different account for loan disbursement for a PPP loan that was being sought for Patrick Development.

26. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application, PATRICK caused Kabbage to disburse a PPP loan in the amount of \$187,501 into an account controlled by PATRICK at Lakeside Bank ending in 0052, when, as PATRICK knew, neither he nor Patrick Capital Group were entitled to the PPP loan funds.

Patrick Development First Draw PPP Loan

27. It was further part of the scheme that on or around June 26, 2020, CRAWFORD and PATRICK submitted and caused to be submitted to Kabbage a PPP loan application on behalf of Patrick Development in the amount of \$673,322, knowing that the application contained false and fraudulent representations regarding: (a) Patrick Development's number of employees; (b) Patrick Development's average monthly payroll; and (c) the truthfulness and accuracy of the application and supporting documents.

28. It was further part of the scheme that, in order to obtain a PPP loan, CRAWFORD prepared and submitted to Kabbage a PPP loan application for Patrick Development which falsely represented that Patrick Development had 33 employees

with an average monthly payroll of \$269,329, and in support of the fraudulent application, submitted copies of false IRS and IDOR tax filings (including IRS Forms W3, 940, and 941, and Illinois Form IL-941) that fraudulently represented that Patrick Development had paid specified numbers of employees various amounts in wages, tips, and other compensation in tax years 2019 and 2020.

29. It was further part of the scheme that, in order to obtain a PPP loan, CRAWFORD advised PATRICK that a bank account other than PATRICK's existing account at Lakeside Bank would be needed, and that an account could quickly be opened with Capital One. On or around June 25, 2020, PATRICK opened an account ending in 9775 at Capital One ("Capital One 9775 Account") and provided the account and routing number to CRAWFORD for inclusion on the Patrick Development PPP loan application.

30. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application, CRAWFORD and PATRICK caused Kabbage to disburse a PPP loan in the amount of \$673,322 into the Capital One 9775 Account, when, as CRAWFORD and PATRICK knew, neither they nor Patrick Development were entitled to the PPP loan funds.

P&C Auto First Draw PPP Loan

31. It was further part of the scheme that on or around June 29, 2020, CRAWFORD submitted and caused to be submitted to Kabbage a PPP loan

application on behalf of P&C Auto in the amount of \$673,322, knowing that the application contained false and fraudulent representations regarding: (a) P&C Auto's number of employees; (b) P&C Auto's average monthly payroll; and (c) the truthfulness and accuracy of the application and supporting documents.

32. It was further part of the scheme that, in order to obtain a PPP loan, CRAWFORD prepared and submitted to Kabbage a PPP loan application for P&C Auto which falsely represented that P&C Auto had 33 employees with an average monthly payroll of \$269,329, and in support of the fraudulent application, submitted copies of false IRS and IDOR tax filings (including IRS Forms W3, 940, and 941, and Form IL-941) that fraudulently represented that P&C Auto had paid specified numbers of employees various amounts in wages, tips, and other compensation in tax years 2019 and 2020.

33. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application, CRAWFORD caused Kabbage to disburse a PPP loan in the amount of \$673,322 into an account controlled by CRAWFORD at IBOC ending in 2875 ("IBOC 2875 Account"), when, as CRAWFORD knew, neither he nor P&C Auto were entitled to the PPP loan funds.

Certoza Solutions EIDL

34. It was further part of the scheme that on or about July 21, 2020, CRAWFORD and ROYSTON submitted and caused to be submitted the SBA an EIDL

application on behalf of Certoza Solutions, knowing that the application contained false and fraudulent representations regarding (a) Certoza Solutions' number of employees; (b) Certoza Solutions' gross receipts, costs of goods sold, and lost rents; (c) the ownership history of Certoza Solutions; and (d) the truthfulness and accuracy of the application.

35. It was further part of the scheme that in order to obtain the EIDL and advance, CRAWFORD prepared the loan application falsely representing that ROYSTON had owned Certoza Solutions since January 2, 2018, and that for the 12 months ending January 1, 2020, Certoza Solutions had Gross Revenues of \$1,432,354, Cost of Goods of \$756,430, Lost Rents of \$42,600, and 17 employees as of that date. ROYSTON certified in the Loan Authorization and Agreement that all representations in the loan application were true, correct, and complete.

36. It was further part of the scheme that on or about June 1, 2020, CRAWFORD and ROYSTON agreed to purchase the Certoza Solutions entity and split the cost between them.

37. It was further part of the scheme that on or about June 2, 2020, CRAWFORD purchased an internet domain for Certoza Solutions and set up an email address for the entity and provided the password to ROYSTON.

38. It was further part of the scheme that on or about June 23, 2020, while CRAWFORD and ROYSTON were awaiting documentation for Certoza Solutions

from the seller, CRAWFORD asked ROYSTON to call the seller, Attorney A, to inform that she and CRAWFORD had purchased Certoza Solutions but had not heard back from the seller.

39. It was further part of the scheme that on or around July 18, 2020, ROYSTON caused a business checking account ending in 8169 to be opened for Certoza Solutions at U.S. Bank (the “USB 8169 Account”).

40. It was further part of the scheme that, through the submission of the false and fraudulent EIDL application, CRAWFORD and ROYSTON caused the SBA to disburse a loan and advance totaling \$159,900 into the USB 8169 Account that ROYSTON maintained and controlled, when, as CRAWFORD and ROYSTON knew, neither they nor Certoza Solutions were entitled to the EIDL funds.

M-Fast PPP Loan

41. It was further part of the scheme that on or around January 25, 2021, CRAWFORD and MILLER submitted and caused to be submitted to Customers Bank a PPP loan application on behalf of M-Fast in the amount of \$633,796, knowing that the application contained false and fraudulent representations regarding: (a) M-Fast’s number of employees; (b) M-Fast’s average monthly payroll; and (c) the truthfulness and accuracy of the application and supporting documents.

42. It was further part of the scheme that, in order to obtain a PPP loan, CRAWFORD prepared and submitted to Customers Bank a PPP loan application for

M-Fast which falsely represented that M-Fast had 33 employees with an average monthly payroll of \$253,518, and submitted a fraudulent ADP report that falsely represented that M-Fast employed 33 individuals throughout 2020 and paid total wages of \$3,042,216.87 for the year.

43. It was further part of the scheme that CRAWFORD and MILLER devised how to, and did, recruit individuals who allowed their identities to be used for creation of records reflecting employment with, and wages received from, M-Fast, when, in reality, the individuals were not employed by M-Fast and had not received the wages reflected in the records created.

44. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application, CRAWFORD and MILLER caused Customers Bank to disburse a PPP loan in the amount of \$633,796 into an account MILLER controlled at NFCU ending in 1990 (the "NFCU 1990 Account"), when, as CRAWFORD and MILLER knew, neither they nor M-Fast were entitled to the PPP loan funds.

45. It was further part of the scheme that on or around August 1, 2022, CRAWFORD and MILLER caused to be submitted to Customers Bank a fraudulent PPP Loan Forgiveness Application Form on behalf of M-Fast, which application falsely represented that (a) M-Fast had 25 employees at the time of the PPP loan and at the time of submission of the PPP Loan Forgiveness Application Form; (b) that

between February 24, 2021, and July 29, 2021, M-Fast had incurred payroll costs of \$767,588.88; and (c) that the \$633,796 for which forgiveness was requested was used to pay business costs eligible for forgiveness.

THR Lifestyle Second Draw PPP Loan

46. It was further part of the scheme that on or around January 28, 2021, CRAWFORD and ROYSTON submitted and caused to be submitted to BMO Harris Bank a second-draw PPP loan application on behalf of THR Lifestyle in the amount of \$88,362.50, knowing that the application contained false and fraudulent representations regarding: (a) THR Lifestyle's number of employees; (b) THR Lifestyle's average monthly payroll; and (c) the truthfulness and accuracy of the application and supporting documents.

47. It was further part of the scheme that, in order to obtain a PPP loan, CRAWFORD and ROYSTON prepared and submitted to BMO Harris Bank a PPP loan application for THR Lifestyle which falsely represented that THR Lifestyle had six employees with an average monthly payroll of \$35,345.

48. It was further part of the scheme that, through the submission of the false and fraudulent PPP loan application, CRAWFORD and ROYSTON caused BMO Harris Bank to disburse a PPP loan in the amount of \$88,362.50 into the BMO 0325 Account, when, as CRAWFORD and ROYSTON knew, neither they nor THR Lifestyle were entitled to the PPP loan funds.

49. It was further part of the scheme that CRAWFORD, ROYSTEN, PATRICK, and MILLER used the PPP and EIDL funds obtained through their submission of fraudulent PPP and EIDL applications to make cash withdrawals and transfers, all for their personal use and benefit, and not for purposes related to the business of the entities.

50. It was further part of the scheme that CRAWFORD, ROYSTEN, PATRICK, and MILLER 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.

51. On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere, defendants DEXTER M. CRAWFORD, Jr., TIMIKA ROYSTON, ORLANDO PATRICK, and JERMIE MILLER, 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 or foreign commerce certain writings, signs, and signals, listed below, each such writing, sign, and signal constituting a separate count:

Count	Defendant(s)	Date	Description of Act
1	DEXTER M. CRAWFORD, Jr. and TIMIKA ROYSTON	May 5, 2020	The transmission in foreign commerce of a Docusign envelope for the THR Lifestyle PPP application

Count	Defendant(s)	Date	Description of Act
2	DEXTER M. CRAWFORD, Jr.	June 23, 2020	An interstate transfer of approximately \$149,900 to fund an EIDL approved for Prestigious Rental
3	ORLANDO PATRICK	June 30, 2020	An interstate transfer of approximately \$187,501 to fund a PPP loan approved for Patrick Capital Group
4	DEXTER M. CRAWFORD, Jr. and ORLANDO PATRICK	June 30, 2020	An interstate transfer of approximately \$673,322 to fund a PPP loan approved for Patrick Development
5	DEXTER M. CRAWFORD, Jr.	July 2, 2020	An interstate transfer of approximately \$673,322 to fund a PPP loan approved for P&C Auto
6	DEXTER M. CRAWFORD, Jr. and TIMIKA ROYSTON	July 6, 2020	An interstate transfer of approximately \$149,900 to fund an EIDL approved for THR Lifestyle
7	DEXTER M. CRAWFORD, Jr. TIMIKA ROYSTON	August 11, 2020	An interstate transfer of approximately \$149,900 to fund an EIDL approved for Certoza Solutions
8	DEXTER M. CRAWFORD, Jr. and JERMIE MILLER	February 24, 2021	An interstate transfer of approximately \$633,796 to fund a PPP loan approved for M-Fast
9	DEXTER M. CRAWFORD, Jr. and TIMIKA ROYSTON	January 28, 2021	The transmission in foreign commerce of a Docusign envelope for a PPP application in the name of THR Lifestyle

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

COUNTS TEN THROUGH TWELVE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEXTER M. CRAWFORD, Jr.,

defendant herein, did knowingly engage and attempt to engage in a monetary transaction affecting interstate or foreign commerce and involving criminally derived property of a value greater than \$10,000, in the manner described by count below, such property having been derived from specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343:

Count	Date	Financial Transaction
10	July 21, 2020	Purchase of Cashier's Check 041503 in the amount of \$12,500 with funds drawn from the IBOC 2875 Account to purchase a 2017 Honda Accord
11	August 5, 2020	Purchase of approximately 3.17724955 Bitcoins for approximately \$37,528 in BitStamp account held by defendant
12	April 1, 2021	Purchase of Cashier's Check 66138654 in the amount of \$39,000 with funds drawn from account ending in 7995 at BMO Harris Bank to purchase a 2016 Cadillac Escalade

All in violation of Title 18, United States Code, Section 1957(a).

COUNT THIRTEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about April 28, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

JERMIE MILLER,

defendant herein, did knowingly engage and attempt to engage in a monetary transaction affecting interstate or foreign commerce and involving criminally derived property of a value greater than \$10,000, that is, funds paid from the NFCU 1990 Account to Kole Digital in the amount of \$10,672, such property having been derived from specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343:

All in violation of Title 18, United States Code, Section 1957(a).

A TRUE BILL:

FOREPERSON

Signed by Michelle Petersen, on behalf of the
UNITED STATES ATTORNEY