

**FILED**  
4/15/2026  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT  
AXM

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

Case No.

v.

Violations: Title 18, United States Code,  
Sections 666(a)(1)(A) and 1519

TIMOTHY KING

**1:26-cr-0172**

**Judge Robert W. Gettleman**

**Magistrate Judge Gabriel A. Fuentes**

**Random / Cat. 4**

**COUNT ONE**

The SPECIAL SEPTEMBER 2025 GRAND JURY charges:

1. At times material to this indictment:
  - a. Urban Prep Academies (“Urban Prep”) was an Illinois not-for-profit corporation engaged in the establishment and operation of charter schools located in the Northern District of Illinois. Urban Prep operated three charter schools, each of which was located in Chicago, Illinois.
  - b. Urban Prep was an organization that received federal benefits in excess of \$10,000 in (i) the period from May 1, 2021, to December 31, 2021, and (ii) the period from January 1, 2022, to December 31, 2022.
  - c. Defendant TIMOTHY KING, a resident of the Northern District of Illinois, was employed as the Chief Executive Officer (“CEO”) of Urban Prep. KING’s duties as CEO included, among other things, the responsible and prudent management of Urban Prep’s funds and assets. As CEO, KING was an agent of Urban Prep and was authorized to use or direct the use of Urban Prep’s funds, including the federal funds that Urban Prep received, for educational or organizational purposes only.

d. Urban Prep maintained a bank account at JPMorgan Chase Bank, N.A. (the “Urban Prep Chase Account”). The Urban Prep Chase Account received funds from numerous sources, including Chicago Public Schools (“CPS”). The CPS funds deposited into the Urban Prep Chase Account included funds originally derived from the federal government. KING was a signatory on the Urban Prep Chase Account with authority to withdraw and expend funds from the account for the benefit of Urban Prep.

e. KING had a personal credit card account with American Express Company (the “King Personal Credit Card Account”), which KING used to make personal purchases and to pay for personal expenses.

2. Beginning on or about May 7, 2021, and continuing through on or about December 30, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY KING,

defendant herein, being an agent of Urban Prep, an organization that received in excess of \$10,000 in federal funding in the period from May 1, 2021, to December 31, 2021, knowingly embezzled, stole, and without authority converted to the use of a person other than the rightful owner and intentionally misapplied \$5,000 or more owned by and under the care, custody, and control of Urban Prep, namely, the use of approximately \$54,414.09 in funds from the Urban Prep Chase Account to pay for personal credit card charges that defendant incurred on the King Personal Credit Card Account;

In violation of Title 18, United States Code, Section 666(a)(1)(A).

**COUNT TWO**

The SPECIAL SEPTEMBER 2025 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.

2. Beginning on or about March 1, 2022, and continuing through on or about May 29, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY KING,

defendant herein, being an agent of Urban Prep, an organization that received in excess of \$10,000 in federal funding in the period from January 1, 2022, to December 31, 2022, knowingly embezzled, stole, and without authority converted to the use of a person other than the rightful owner and intentionally misapplied \$5,000 or more owned by and under the care, custody, and control of Urban Prep, namely, the use of approximately \$49,419.22 in funds from the Urban Prep Chase Account to pay for personal credit card charges that defendant incurred on the King Personal Credit Card Account;

In violation of Title 18, United States Code, Section 666(a)(1)(A).

**COUNT THREE**

The SPECIAL SEPTEMBER 2025 GRAND JURY further charges:

1. The allegations in paragraph 1(a) through (d) of Count One of this indictment are incorporated here.

2. At times material to this indictment:

a. Beginning no later than in or around June 2022, the United States Department of Justice, the United States Department of Education, Office of the Inspector General, and the Internal Revenue Service, Criminal Investigation (collectively, the “Federal Agencies”), were conducting an investigation of Urban Prep, KING, and others concerning potential violations of federal law.

b. The investigation included determining: (i) the reasons for non-payroll transfers of Urban Prep funds to KING; (ii) whether KING had improperly used Urban Prep funds for personal benefit, including to pay for personal credit card charges that he incurred on personal credit card accounts; and (iii) the accuracy of individual income tax returns KING filed or caused to be filed with the Internal Revenue Service.

c. On or about June 6, 2022, the Department of Justice served a federal grand jury subpoena on Urban Prep (the “Subpoena”) requiring Urban Prep to produce, among other things, “records reflecting funding distributions and/or reimbursements,” “records reflecting expenditure of funds,” “account statements,” “accounting records related to payments to credit card companies, including American Express, JP Morgan Chase, Barclay’s Bank, and Citibank,” “accounting

records relating to non-payroll” transfer of funds to KING, all W-2 and other tax documents relating to KING, and “[a]ll accounting records including transactions, journals and ledgers.”

d. Company A operated an online, cloud-based donor management and fundraising software that Urban Prep used to track its donors and donations.

e. On or about August 9, 2022, KING accessed Urban Prep’s Company A account and deleted three donation entries from the account as follows: a donation made on or about November 16, 2015, from KING to Urban Prep in the amount of \$10,000; a donation made on or about June 14, 2016, from KING to Urban Prep in the amount of \$20,000; and a donation made on or about June 14, 2017, from KING to Urban Prep in the amount of \$20,000.

f. On or about October 13, 2022, a Company A report detailing the donors, donation amounts, and donation dates of donations that Urban Prep received between in or around 2014 and in or around 2022 was produced to the Federal Agencies in response to the Subpoena, which report did not include the three donation entries that KING had deleted from Urban Prep’s Company A account on or about August 9, 2022.

3. Beginning on or about August 9, 2022, and continuing through on or about October 13, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY KING,

defendant herein, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department or agency of the United States, namely, the United States Department of Justice, the United States Department of Education, Office of the Inspector General, and the Internal Revenue Service, Criminal Investigation, and in relation to and contemplation of such a matter, did knowingly alter, destroy, mutilate, conceal, cover up, falsify, and make a false entry in a record, document, and tangible object, namely, by deleting and concealing donation entries from Urban Prep's Company A account;

In violation of Title 18, United States Code, Section 1519.

**FORFEITURE ALLEGATION**

The SPECIAL SEPTEMBER 2025 GRAND JURY further alleges:

1. Counts One and Two of this indictment are incorporated here for the purpose of alleging forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. As a result of his violations of Title 18, United States Code, Section 666(a)(1)(A), as alleged in Counts One and Two of this indictment,

TIMOTHY KING,

defendant herein, shall forfeit to the United States any and all right, title, and interest he has in any property, real and personal, which constitutes or is derived from proceeds traceable to the offenses in Counts One and Two.

3. The property to be forfeited by KING as a result of his violation of Title 18, United States Code, Section 666(a)(1)(A), includes, but is not limited to, a personal money judgment in the amount of approximately \$103,833.31.

4. If any of the property described above, as a result of any act or omission by the 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), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY