

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Kelli Prather

Defendant(s)

Case No. 1:21-MJ-00267

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 23 thru August 4, 2020 in the county of Hamilton in the Southern District of Ohio, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Rows include 18 U.S.C. Section 1001 (False Statements to Department or Agency of the United States), 18 U.S.C. Section 1014 (False Statements in Loan or Credit Applications), 18 U.S.C. Section 1028A (Aggravated Identity Theft), 18 U.S.C. Section 1344 (Bank Fraud), and 42 U.S.C. Section 408(a)(8) (Unauthorized Disclosure of a Social Security Number).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Complainant's signature

Ferron M. Yi, Special Agent FBI
Printed name and title

Sworn to before me and signed in my presence. via electronic means, specifically Facetime video.

Date: Mar 30, 2021

Judge's signature



City and state: Cincinnati, Ohio

Hon. Stephanie K. Bowman, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ferron M. Yi, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (hereafter “FBI”) and have been since February 2020. I am currently assigned to the Complex Financial Crimes Squad of the Cincinnati Division. In this capacity, I investigate matters involving criminal enterprises, white collar crimes, civil rights violations, money laundering, and various types of fraud. Prior to my employment with the FBI, I served as a sworn peace officer in the State of Georgia for over 10 years. I have received training and investigative experience in interviewing and interrogation techniques, arrest procedures, search and seizure, search warrant applications, electronic media and computer investigations, and various other crimes and investigative techniques including Title III investigations. As an FBI Special Agent, I am responsible for the investigation and enforcement of violations of United States law, including laws dealing with bank fraud, wire fraud, identity theft, and false statements.

2. I am familiar with the facts and circumstances of this case. The information contained in this affidavit is either personally known to me, based upon my interview of various witnesses and review of various records and publicly available information, or has been relayed to me by other agents or sworn law enforcement personnel. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning the investigation. I have only set forth facts to establish probable cause for the charges in the complaint.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1344 (Bank Fraud), 18 U.S.C.

§ 1014 (False Statements in Loan and Credit Applications), 42 U.S.C. § 408(a)(8) (Unauthorized Disclosure of a Social Security Number), 18 U.S.C. § 1028A (Aggravated Identity Theft), and 18 U.S.C § 1001 (False Statements to Department or Agency of the United States), among others have been committed by Kelli Prather.

II. PROBABLE CAUSE

A. The government is investigating fraud involving loan programs designed to assist small businesses during the pandemic.

4. In approximately September 2020, the FBI initiated an investigation of Kelli Prather (dob XX/XX/1972) (hereafter “Prather”), the purported owner of Enhanced Healthcare Solutions, Life Skills Enhancement, Prather Property Management, Reliable Ambulette Services, Rich Glo Management Services, and Tots R Us, for suspected violations of 18 U.S.C. § 1344 (Bank Fraud), and 18 U.S.C. § 1014 (False Statements in Loan or Credit Applications), stemming from her application for certain loan programs administered by the United States Small Business Administration (SBA).

5. The SBA is an executive-branch agency of the United States government that provides support to entrepreneurs and small businesses. The mission of the SBA is to maintain and strengthen the nation’s economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters. As part of this effort, the SBA provides for loans through banks, credit unions and other lenders. These loans have government-backed guarantees.

6. In addition to traditional SBA funding programs, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, a federal law enacted on March 27, 2020, established several new temporary programs and provided for the expansion of others to address the coronavirus (COVID-19) pandemic. One of these new programs is the SBA Paycheck Protection Program

(PPP), which is a loan designed to provide a direct incentive for small businesses to keep their workers on the payroll. Under this program, the SBA will forgive all or part of loans if all employees were kept on the payroll for eight weeks and borrowers submit documentation confirming that the loan proceeds were used for payroll, rent, mortgage interest, or utilities. Interested applicants apply through an existing SBA lender or any other participating federally insured financial institution.

7. In order to obtain a PPP loan, a qualifying business must submit a PPP loan application, which is signed by an authorized representative of the business. The PPP loan application requires 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. In the PPP loan application, the authorized representative must state, among other things, the business': (a) average monthly payroll expenses; and (b) number of employees. These figures are used to calculate the amount of money the small business is eligible to receive under the PPP. In addition, businesses applying for a PPP loan must provide documentation to the lending institution showing their payroll expenses; typically, businesses would supply documents showing the amount of payroll taxes reported to the Internal Revenue Service ("IRS").

8. A PPP loan application must be processed by a participating lender. If a PPP loan application is approved, the participating lender funds the PPP loan using its own monies, which are 100% guaranteed by the SBA. Data from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, is electronically transmitted by the lender to the SBA in the course of processing the loan. The SBA requires business owners to have a legitimate business bank account to accept any PPP Loan disbursements.

B. Discrepancies between Prather's PPP loan applications and supporting documentation suggest fraud.

9. During the investigation, I learned that Prather applied for six SBA PPP loans and opened six business bank accounts with Fifth Third Bank (FDIC-insured) immediately after applying those SBA PPP loans. Of the six PPP loan applications submitted, Prather only received one PPP loan for Enhanced Healthcare Solutions LLC from Fifth Third Bank.

10. Upon further review of the PPP loan application for Enhance Healthcare Solutions LLC, and supporting documents, however, Fifth Third Bank discovered a number of errors. For example, Fifth Third personnel flagged that Prather used an inaccurate Personal Identification Number (PIN) and while processing that, Fifth Third Bank identified that the information input was for 2020 as compared to 2019.

11. During its review, Fifth Third Bank personnel also noticed there were five additional pending SBA PPP Loan Applications submitted by Prather. The applications are further described below:

Loan #	Entity Name	Application Start Date	Number of Employees Claimed	Claimed Average Monthly Payroll	Initial Amount Sought	Bank* Reduced Average Monthly Payroll/Amount Sought	Amount Disbursed	Date Deposited
x4106	Enhanced Healthcare Solutions LLC	June 23, 2020	1	\$7,945.00	\$19,862.00	\$7,945.00 x2.5 = \$19,862.00	\$19,862.00	July 2, 2020
X8002	Rich Glo Management Services LLC	July 22, 2020	9	\$83,000.00	\$207,500.00	\$25,000.00 x2.5 = \$62,500.00*	\$0.00	
x7897	Prather Property Management LLC	July 27, 2020	5	\$41,440.00	\$103,602.00	\$25,000.00 x2.5 = \$62,500.00*	\$0.00	
x7904	Life Skills Enhancement OT Services PC	August 4, 2020	1	\$17,216.00	\$43,040.00	\$8,333.00 x2.5 = \$20,832.00*	\$0.00	
x7910	Reliable Ambulette Service LLC	August 4, 2020	4	\$45,800.00	\$114,510.00	\$33,333.00 x2.5 = \$83,332.00	\$0.00	
x7913	Tots R Us LLC	August 4, 2020	3	\$51,150.00	\$127,875.00	\$25,000.00 x2.5 = \$62,500.00	\$0.00	
Total:					\$616,389.00	\$311,526.00	\$19,862.00	

12. Fifth Third Bank requested that Prather provide additional documentation to support her PPP loan application claims, including her 2019 personal income tax return. Based upon the discrepancies in the documents provided by Prather, Fifth Third Bank declined to fund the other loans.

13. Comparing Prather's PPP loan applications and supporting documentation, I noticed significant discrepancies suggesting fraud. For example, on June 23, 2020, Prather filed a SBA PPP Loan application for Enhanced Healthcare Solutions LLC (application number x4106). A review of her application reveals that Prather claimed to have one employee (presumably herself) with an average monthly payroll of \$19,862.00. However, the 2019 Schedule C Form she submitted as supporting documentation indicated \$1,500.00 in total annual income and the business address was listed 1616 First Avenue, Cincinnati, Ohio, 45202, which is a residential address. Based on my training, knowledge, and experience I know that inconsistencies between loan applications and supporting documents are a common indicator of fraud. In addition, records received via legal process show that Fifth Third Bank reached out to Prather and explained that the documentation that Prather provided showed multiple inconsistencies and that the income reported on the tax returns Prather submitted did not correlate to the amounts that were listed on the SBA PPP loan applications.

14. The other failed loan applications similarly appeared to inflate claimed gross revenues and contain other discrepancies indicative of fraud. On or about July 22, 2020, Prather applied for a SBA PPP Loan for Rich Glo Management Services LLC (application number x8002) for the amount of \$62,500.00. Prather claimed she had three employees and submitted as supporting documentation a 941 Form claiming that her total payroll for 2020 first quarter

(January, February, March) and second quarter (April, May, June) was \$1,104,349.00. The business address she used on the application was 1616 First Avenue, Cincinnati, Ohio, 45202. However, the address that was used on the 941 Form was 5104 Kenwood Road, Cincinnati, Ohio 45202 which is also a residential address.

15. On or about July 27, 2020, Prather submitted a SBA PPP Loan application for Prather Property Management LLC (application number x7897). She initially requested \$103,602.00; however, Fifth Third Bank reduced the request to \$62,500.00. In the application, Prather claimed she had three employees and submitted as supporting documentation a 941 Form claiming that her total payroll for 2020 first quarter (January, February, March) and second quarter (April, May, June) was \$248,646.00. She again used the 1616 First Avenue, Cincinnati, Ohio, 45202 address, however, the address that was used on the 941 Form was 5104 Kenwood Road, Cincinnati, Ohio 45202.

16. On or about August 4, 2020, Prather applied for a SBA PPP Loan for Life Skills Enhancement OT Services PT (application number x7904). She initially requested \$43,040.00; however, that request was reduced by Fifth Third Bank to \$20,832.00. In support of her application, Prather submitted a 941 Form claiming that her total payroll for 2020 first quarter (January, February, March) and second quarter (April, May, June) was \$103,300.00. In this application, she listed a business address on of 225A Pond Way, Staten Island, New York, 10303, which is a residential address.

17. On or about August 4, 2020, Prather applied for a SBA PPP Loan for Reliable Ambulette Service LLC (application number x7910). Prather initially requested a loan amount of \$114,510.00; however, this was reduced by Fifth Third Bank to \$83,332.00. Prather submitted a 941 Form claiming that her total payroll for 2020 first quarter (January, February, March) and

second quarter (April, May, June) was \$274,827.00. She listed a business address of 791 East McMillan Street, Suite 210, Cincinnati, Ohio 45206, which is a mixed-use office building under construction. By contrast, the address used on the 941 Form was 5104 Kenwood Road, Cincinnati, Ohio 45202, which is a residential address. In support of this application, Prather also submitted a Form 1065, Schedule K-1, 2019 form. The form lists Terri-Prather-Kajake (a/k/a Terri Prather) and Stephon Thornton, along with their social security numbers, as partners in the business.

18. On or about August 4, 2020, Prather applied for a SBA PPP Loan for Tots R Us LLC (application number x7913). Prather initially requested \$127,875.00; however, this amount was reduced by Fifth Third Bank to \$62,500.00. Prather submitted a 941 Form claiming that her total payroll for 2020 first quarter (January, February, March) and second quarter (April, May, June) was \$270,678.00. The business address on the application was listed as 1616 First Avenue, Cincinnati, Ohio 45205. The address that was used on the 941 Form was 791 East McMillan Street, Suite 210, Cincinnati, Ohio 45206, which is a mixed-use office building under construction.

19. Your affiant performed searches of the corporate registration of these businesses. Businesses Enhanced Healthcare Solutions, Prather Property Management, Reliable Ambulette Service LLC, Tots R Us LLC, and Rich Glo Management Services LLC do appear on the State of Ohio Secretary of State website as businesses registered to Prather. In addition, Life Skills Enhancement OT Services PC appears on the State of New York Division of Corporations website as a business where Prather is listed as a Chief Executive Officer. However, open source research suggests that none of the above-mentioned businesses are currently operational or were in operation in 2019. Your affiant found no web presence, marketing material, advertising, or

other records of these businesses that would suggest that they generate the amount of revenue or support the number of employees claimed.

C. Evidence suggests that Prather used PPP loan proceeds for expenditures contrary to SBA program rules.

20. Review of Prather's bank transactions following disbursement of PPP loan funds appear to be inconsistent with legitimate business-related activity. Instead, review of Prather's banking activity indicated money was either being pocketed by Prather or funding expenses that appear to be personal in nature such as salon and restaurant visits.

21. For example, in the bank statement comprising the period of July 01, 2020 to July 31, 2020, it shows that on July 2, 2020, Prather received a SBA PPP Loan disbursement of \$19,862.00. Beginning on or about July 6, 2020, and continuing through on or about July 27, 2020, Prather made 42 withdrawals or debits totaling approximately \$5,005.91, including purchases to various restaurants including but not limited to Seasons 52, Park Place Restaurant, and Juicy Crab in Atlanta, Georgia, purchases at various department and retail stores including but not limited to Kroger, Family Dollar, Staples, AAA Auto Wash, Value City, Home Depot, and made various PayPal transactions and withdrawals. The following is a synopsis of Prather's transaction history:

- a. July 06, 2020 for \$107.66 at Dollar General in Atlanta, Georgia
- b. July 06, 2020 for \$125.24 at City Gear in Atlanta, Georgia
- c. July 06, 2020 for \$166.87 at PayPal
- d. July 06, 2020 for \$119.44 at Kroger in Atlanta, Georgia
- e. July 07, 2020 for \$28.08 at Juicy Crab in Atlanta, Georgia
- f. July 08, 2020 for \$645.98 at State Farm Insurance
- g. July 09, 2020 for \$122.00 – Withdrawal

- h. July 10, 2020 for \$14.00 at SQ Cream and Sugar in Cincinnati, Ohio
- i. July 10, 2020 for \$11.95 at Kroger in Cincinnati, Ohio
- j. July 13, 2020 for \$7.15 at Chipotle in Cincinnati, Ohio
- k. July 13, 2020 for \$25.82 at Staples in Cincinnati, Ohio
- l. July 13, 2020 for \$51.48 at KY Occupations Pro
- m. July 13, 2020 for \$56.84 at Family Dollar in Cincinnati, Ohio
- n. July 13, 2020 for \$800.00 at Sprint
- o. July 13, 2020 for \$36.74 at Kroger in Cincinnati, Ohio
- p. July 14, 2020 for \$30.00 at BP in Cincinnati, Ohio
- q. July 14, 2020 for \$101.65 at SQ Pretty and Polis in Cincinnati, Ohio
- r. July 14, 2020 for \$235.40 at SQ Pretty and Polis in Cincinnati, Ohio
- s. July 14, 2020 for \$63.29 at Kroger in Cincinnati, Ohio
- t. July 15, 2020 for \$7.64 at USPS
- u. July 15, 2020 for \$35.15 at Staples in Cincinnati, Ohio
- v. July 15, 2020 for \$60.00 – Withdrawal
- w. July 16, 2020 for \$66.32 at Staples in Cincinnati, Ohio
- x. July 17, 2020 for \$15.00 at AAA Auto Wash in Cincinnati, Ohio
- y. July 17, 2020 for \$31.17 at PayPal
- z. July 20, 2020 for \$39.85 at Kroger in Mitchell, Kentucky
- aa. July 20, 2020 for \$100.00 – Withdrawal
- bb. July 20, 2020 for \$124.38 at Ohio BMV in Columbus, Ohio
- cc. July 20, 2020 for \$700.00 at Value City in Florence, Kentucky
- dd. July 20, 2020 for \$14.19 at Kroger in Cincinnati, Ohio

- ee. July 20, 2020 for \$68.59 at Home Depot in Cincinnati, Ohio
- ff. July 20, 2020 for \$142.00 – Withdrawal
- gg. July 21, 2020 for \$100.00 – Withdrawal
- hh. July 23, 2020 for \$300.00 – Withdrawal
- ii. July 24, 2020 for \$24.00 at Ucan Nonprofit in Cincinnati, Ohio
- jj. July 27, 2020 for \$22.66 at Seasons 52 in Cincinnati, Ohio
- kk. July 27, 2020 for \$23.48 at Park Place Restaurant in Forest Park, Ohio
- ll. July 27, 2020 for \$26.98 at BP in Cincinnati, Ohio
- mm. July 27, 2020 \$200.00 – Withdrawal
- nn. July 27, 2020 for \$12.00 at Merchant Payment in Cincinnati, Ohio
- oo. July 30, 2020 for \$115.65 at Wal-Mart in Cincinnati, Ohio
- pp. July 31, 2020 for \$25.26 at Rons Foodmart in Covington, Kentucky.

None of these expenses appear to be consistent with payroll or other covered PPP expenses.

22. In addition to the withdrawals and debits, Prather made in-person withdrawals and/or wrote checks totaling \$9,880.00. Of those checks, on July 07, 2020, Prather made a withdrawal of \$8,000.00 at Fifth Third Bank and on July 17, 2020, purchased an official cashier's check in the amount of \$8,000.00 to pay Darryl Willis (hereafter "Willis") for a property located at 5104 Kenwood Road, Cincinnati, Ohio 45202. On July 09, 2020, Prather made a withdrawal of \$1,800.00. On July 14, 2020, Prather made an additional withdrawal for \$80.00 where she physically signed for this withdrawal from her Enhanced Healthcare Solutions business account.

23. In the bank statement comprising the period of August 01, 2020 to August 31, 2020, Prather made 38 withdrawals or debits totaling approximately \$3,705.97, including purchases to various restaurants including but not limited to Krispy Kreme, Rally's, Wendy's,

Popeye's, and Mi Cozumel, purchases at various department and retail stores including but not limited to Dollar General, Wal Mart, Enterprise, Walgreens, Bath and Body Works, Pandora, Dollar Tree, Modern Nails, Staples, and made and various CashApp transactions and withdrawals. The following is a synopsis of Prather's transaction history:

- a. August 03, 2020 for \$17.11 at Debit Card Purchase in Cincinnati, Ohio
- b. August 03, 2020 for \$20.00 at Shell in Cincinnati, Ohio
- c. August 03, 2020 for \$31.72 at SQ Pretty and Polis in Cincinnati, Ohio
- d. August 03, 2020 for \$350.96 at IStorage in Ohio
- e. August 03, 2020 for \$4.39 at Dollar General in Cincinnati, Ohio
- f. August 03, 2020 for \$27.64 at Wal-Mart in Cincinnati, Ohio
- g. August 03, 2020 for \$169.93 at Wal-Mart in Cincinnati, Ohio
- h. August 03, 2020 for \$600.00 – Cash
- i. August 04, 2020 for \$175.00 at NCRC.ORG
- j. August 05, 2020 for \$1.00 at City of Newport in Newport, Kentucky
- k. August 05, 2020 for \$6.50 at Camp Washington in Cincinnati, Ohio
- l. August 07, 2020 for \$552.07 at Enterprise in Newport, Kentucky
- m. August 10, 2020 for \$12.17 at Krispy Kreme in Pigeon Forge, Tennessee
- n. August 10, 2020 for \$540.26 at State Farm Insurance
- o. August 10, 2020 for \$35.40 at Wendy's in Knoxville, Tennessee
- p. August 11, 2020 for \$31.25 at Shell in Mount Vernon, Kentucky
- q. August 11, 2020 for \$240.00 – Withdrawal
- r. August 11, 2020 for \$289.62 at Home Depot in Cincinnati, Ohio
- s. August 12, 2020 for \$21.50 – Service Charge

- t. August 13, 2020 for \$6.25 at Rally's in Cincinnati, Ohio
- u. August 13, 2020 for \$30.19 at Shell in Covington, Kentucky
- v. August 13, 2020 for \$100.00 – Withdrawal
- w. August 14, 2020 for \$34.31 at Walgreens in Cincinnati, Ohio
- x. August 14, 2020 for \$62.06 at Bath and Body Works in Cincinnati, Ohio
- y. August 14, 2020 for \$27.67 at Wal-Mart in Cincinnati, Ohio
- z. August 14, 2020 for \$117.70 at Pandora in Cincinnati, Ohio
- aa. August 17, 2020 for \$23.99 at Popeye's in Cincinnati, Ohio
- bb. August 17, 2020 for \$227.79 at Mi Cozumel in Cincinnati, Ohio
- cc. August 17, 2020 for \$5.35 at Dollar Tree in Springdale, Ohio
- dd. August 19, 2020 for \$112.72 at Modern Nails in Cincinnati, Ohio
- ee. August 21, 2020 for \$24.33 at Dollar Tree in Cincinnati, Ohio
- ff. August 24, 2020 for \$35.31 at St Vincent De Paul in Cincinnati, Ohio
- gg. August 25, 2020 for \$11.53 at Staples in Cincinnati, Ohio
- hh. August 25, 2020 for \$36.05 at Wal-Mart in Cincinnati, Ohio
- ii. August 26, 2020 for \$19.00 at SQ Banasun Smooth in Cincinnati, Ohio
- jj. August 26, 2020 for \$160.00 – Withdrawal
- kk. August 31, 2020 for \$20.00 at BP in Cincinnati, Ohio
- ll. August 31, 2020 for \$25.00 at CashApp
- mm. August 31, 2020 for \$100.00 – Withdrawal

D. Interview with Kelli Prather

24. On November 20, 2020, I, along with FBI Special Agent Michael Reigle, conducted a voluntary interview of Prather at the office of the FBI Cincinnati, located at 2012 Ronald Reagan Drive, Cincinnati, Ohio 45236, with her attorney, Rodney Harris (hereafter “Harris”), present. Prather told agents that she was approved for SBA for loans for all of her businesses; however, she could only recall applying under “Enhanced Healthcare Solutions,” Prather Property Management, Tots R Us, and “Life Skills,” and Kelli Prather OT. According to Prather, SBA approved Prather for the loans; however, Fifth Third Bank did not approve the loans. Fifth Third Bank asked Prather for additional documents, which she provided.

25. Prather claimed that she was not approved for the other loans due to her low credit score. Prather also claimed that not only were her businesses established and legitimate, but she already filed Profit and Loss Statements for each business.

26. Prather additionally claimed that she needed the SBA funds to pay her contractors, pay for business space located at 911 East McMillian Street, Cincinnati, Ohio, and to pay off other debt she accrued. According to Prather, Fifth Third Bank gave her the “\$19,000.00” as a personal paycheck loan. She stated she used the funds to pay old expenses, rent, and business expenses, but conceded that she used some of the money for personal expenses.

E. Other interviews conducted by agents

27. On February 17, 2021, Social Security Administration Office of the Inspector General (SSAOIG) Special Agent Frederick Reier and I interviewed Terri Prather and Stephon Thornton. They both claimed that while they had discussed starting up the business with Prather, no further action was taken beyond that. They additionally stated that they were completely

unaware of the PPP loan application for Reliable Ambulette Service LLC and did not approve of Prather using their information to apply for the loan.

28. On December 04, 2020, I, along with Housing Urban Development Authority Office of the Inspector General (HUDOIG) Special Agent Craig Harmeling, conducted a voluntary interview of Willis at the office of the FBI Cincinnati, located at 2012 Ronald Reagan Drive, Cincinnati, Ohio 45236, with his attorney, Robert Kelly (hereafter “Kelly”), present. Willis essentially stated to agents that sometime in 2013, Prather purchased the property located at 5104 Kenwood Road, Cincinnati, Ohio 45227, with the intention of using that property as a residential investment/rental property. This property was put in Willis’s name and was purchased while Willis and Prather were in a relationship. The property needed substantial work, including replacing the furnace, water heater, and some windows. The property was not conducive for conducting a business. Willis indicated that he never knew Prather to have an operational, functional, or profitable business located at this address. Willis maintained ownership of this property and never knew Prather to utilize this location as a business.

29. According to Willis, after their breakup, Prather put a cashier’s check in the amount of \$8,000.00 in Willis’s mailbox to pay for the residence located at 5104 Kenwood Road, Cincinnati, Ohio 45227. Willis did not cash the cashier’s check and turned over the physical check to the FBI.

30. Willis claimed that the only employment that he knew Prather to have was working as an occupational therapist in New York. Willis was unaware of any of the above-mentioned businesses when talking to agents, and did not believe Prather was operating a successful business at 5104 Kenwood Road, Cincinnati, Ohio 45227.

III. CONCLUSION

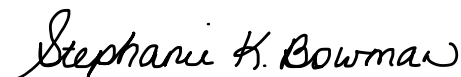
31. Based on the foregoing, I request that the Court issue the proposed criminal complaint. There is probable cause to believe that violations of 18 U.S.C. § 1344 (Bank Fraud), and 18 U.S.C. § 1014 (False Statements in Loan or Credit Applications), 42 U.S.C. § 408(a)(8) (Unauthorized Disclosure of a Social Security Number), 18 U.S.C. § 1028A (Aggravated Identity Theft), and 18 U.S.C § 1001 (False Statements to Department or Agency of the United States), have been committed by Kelli Prather. I, therefore, respectfully request that an arrest warrant be issued authorizing the arrest of Kelli Prather.

Respectfully submitted,



Ferron M. Yi
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on this 30 day of March, 2021.
via electronic means, specifically Facetime video.



HONORABLE STEPHANIE K. BOWMAN
UNITED STATES MAGISTRATE JUDGE

