

SEALED



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :
 :
 v. : 1:20CR.334-1
 :
 BRANDON RASHAD LEWIS :

The United States Attorney charges:

General Allegations

At all times relevant to this Information:

The Defendant and Related Entities

1. BRANDON RASHAD LEWIS was a resident of Greensboro, North Carolina, in the Middle District of North Carolina.
2. Lewis Revenue Group, LLC (“LRG”) was a North Carolina company formed in or around October 2019. BRANDON RASHAD LEWIS was the sole organizer, member, and employee of LRG.

Relevant Financial Institutions and Payment Processing Services

3. Financial Institution A was a multinational investment bank and financial services company headquartered in North Carolina. BRANDON RASHAD LEWIS maintained multiple accounts at Financial Institution A.

4. Payment Processor 1 was a financial services and software company that offered payment processing software and application programming interfaces for e-commerce websites and mobile applications and was headquartered outside of North Carolina. BRANDON RASHAD LEWIS maintained an account at Payment Processor 1.

5. Payment Processor 2 was an American financial services, merchant services provider, and mobile payment company headquartered outside of North Carolina. BRANDON RASHAD LEWIS maintained an account at Payment Processor 2.

6. Payment Processor 3 was a company that provided financial services and software for small businesses and was headquartered outside of the United States. BRANDON RASHAD LEWIS maintained an account at Payment Processor 3.

***The Small Business Administration
Economic Injury Disaster Loan Program***

7. The United States Small Business Administration (“SBA”) was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses. The mission of the SBA was 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.

8. The Economic Injury Disaster Loan (“EIDL”) program was an SBA initiative that provided low-interest financing to small businesses, renters, and homeowners in regions affected by declared disasters.

9. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in March 2020 and designed to provide emergency financial assistance to millions of Americans suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the expansion of the EIDL program, authorizing low interest loans of up to \$2 million to eligible small businesses experiencing substantial financial disruptions due to the COVID-19 pandemic. In addition, the CARES Act authorized the SBA to issue advances of up to \$10,000 to small businesses within three days of applying for an EIDL. The amount of the advance was determined by the number of employees the applicant certified having. The advances did not have to be repaid.

10. In order to obtain an EIDL and advance, a qualifying business was required to submit an application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the 12-

month period preceding the disaster, and cost of goods sold in the 12-month period preceding the disaster. The applicant was also required to certify that all of the information in the application was true and correct to the best of the applicant's knowledge.

11. On March 13, 2020, President Donald J. Trump declared COVID-19 a national emergency.

COUNT ONE
(Wire Fraud – The “Home Kitchen Goods” Scheme)

12. The allegations set forth in paragraphs 1, 2, 6, and 11 of this Information are realleged and incorporated as if set forth herein.

13. From on or about March 16, 2020, through on or about March 24, 2020, the exact dates unknown, in the County of Guilford, in the Middle District of North Carolina, BRANDON RASHAD LEWIS did knowingly devise, and intend to devise, a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises that were material, in connection with a presidentially declared national emergency, and for the purpose of executing such scheme and artifice, and attempting to do so, knowingly caused to be transmitted by means of wire, radio, and television communication any

writings, signs, signals, pictures, and sounds in interstate and foreign commerce.

The Home Kitchen Goods Scheme – Manner and Means

14. It was part of the scheme that BRANDON RASHAD LEWIS created the website “www.homekitchengoods.com” which purported to sell, among other things, sought after pandemic-related household goods including disinfecting wipes, hand sanitizer, paper towels, and toilet paper. On the Home Kitchen Goods website, LEWIS falsely claimed that these items were all “in stock.”

15. It was further part of the scheme that BRANDON RASHAD LEWIS utilized social media platforms to promote the availability of these pandemic-related household goods on www.homekitchengoods.com and direct consumers to the website. From on or about March 20, 2020 through March 24, 2020, BRANDON RASHAD LEWIS received more than 8,500 orders through www.homekitchengoods.com.

16. It was further part of the scheme that BRANDON RASHAD LEWIS utilized his account at Payment Processor 1 to receive payment for those goods. Between March 20, 2020 and March 24, 2020, consumers

purchased more than \$400,000 in pandemic-related household goods from www.homekitchengoods.com.

17. It was further part of the scheme that BRANDON RASHAD LEWIS never had or delivered any of the goods sold on www.homekitchengoods.com.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TWO
(Wire Fraud – The “COVID-19 Relief Fund” and
“American Relief Fund” Scheme)

18. The allegations set forth in paragraphs 1 through 3, 5 and 6, and 7 through 11 of this Information are realleged and incorporated as if set forth herein.

19. From on or about April 1, 2020, through on or about June 23, 2020, the exact dates unknown, in the County of Guilford, in the Middle District of North Carolina, BRANDON RASHAD LEWIS did knowingly devise, and intend to devise, a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises that were material, in connection with a presidentially declared national emergency, and for the purpose of executing such scheme and artifice, and attempting to do so, knowingly caused to be

transmitted by means of wire, radio, and television communication any writings, signs, signals, pictures, and sounds in interstate and foreign commerce.

**The “COVID-19 Relief Fund” and
“American Relief Fund” Scheme – Manner and Means**

20. It was part of the scheme that in or around April 2020, BRANDON RASHAD LEWIS created the so-called “COVID-19 Relief Fund.” BRANDON RASHAD LEWIS, as president of LRG, purportedly managed and oversaw the “COVID-19 Relief Fund.”

21. It was further part of the scheme that BRANDON RASHAD LEWIS promised “guaranteed funds” of between \$12,500 and \$15,000 in exchange for an upfront “reservation” fee of between \$995 and \$1,200, respectively.

22. It was further part of the scheme that BRANDON RASHAD LEWIS utilized targeted email marketing, social media campaigns, paid content, and sophisticated press release distribution services to promote the “COVID-19 Relief Fund” and direct potential grant applicants to the application website.

23. It was further part of the scheme that BRANDON RASHAD LEWIS published an article on a purported news website, which he owned and controlled, falsely claiming that he had “successfully helped 426 small businesses get COVID-19 relief grants,” totalling over \$5.3 million in distributions.

24. It was further part of the scheme that BRANDON RASHAD LEWIS utilized his accounts at Payment Processor 2 and Payment Processor 3 to receive these so-called “reservation” fees. Between April 15, 2020, and April 27, 2020, owners of more than 100 small businesses paid BRANDON RASHAD LEWIS in excess of \$100,000 in “reservation” fees.

25. It was further part of the scheme that BRANDON RASHAD LEWIS never had or distributed any grant funds to the “COVID-19 Relief Fund” applicants.

26. It was further part of the scheme that in or around May 2020, BRANDON RASHAD LEWIS created the so-called “American Relief Fund,” offering \$5,000 grants to “every American affected by COVID-19.”

27. It was further part of the scheme that BRANDON RASHAD LEWIS created a separate website for the “American Relief Fund.” On the website, BRANDON RASHAD LEWIS falsely claimed that the “American

Relief Fund” was sponsored and funded by multiple, well-known corporations. BRANDON RASHAD LEWIS also used the official trademarks and logos of such corporations without their permission and in furtherance of the scheme.

28. It was further part of the scheme that BRANDON RASHAD LEWIS never had or distributed any grant funds to the “American Relief Fund” applicants.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT THREE
(False Statements – The Economic Injury Disaster Loan Scheme)

29. The allegations set forth in paragraphs 1, 3 and 7 through 11 of this Information are realleged and incorporated as if set forth herein.

30. From on or about April 1, 2020, through on or about June 19, 2020, the exact dates unknown, in the County of Guilford, in the Middle District of North Carolina, in a matter within the jurisdiction of the United States Small Business Administration, an agency of the executive branch of the government of the United States, BRANDON RASHAD LEWIS did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations; that is, on applications for the Small Business Administration Economic Income Disaster Relief loan program, BRANDON RASHAD LEWIS

certified that certain information, specifically the number of employees and gross revenues for several of his companies, such as Ambitious Marketing, LLC, Cool Consulting, LLC, Flexible Solutions, LLC, Mad Genius Management, LLC, Mayfield Management Firm, Inc., and Windsor Asset Group, LLC, was true and correct, when, as BRANDON RASHAD LEWIS then well knew, it was not.

All in violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

FORFEITURE ALLEGATION

31. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

32. Upon conviction of one or more of the offenses charged in Counts One and Two of this Indictment, the defendant, BRANDON RASHAD LEWIS, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense.

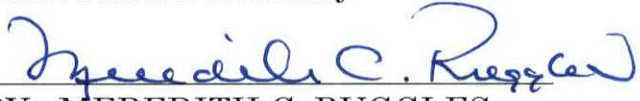
33. The property to be forfeited may include but is not limited to the following:

- a. Two Thousand Two Hundred Seventy and 76/100 Dollars (\$2,270.76) seized from the Bank of America account number ending in 4184 in the name of DBA Lewis Revenue Group, Brandon Lewis Sole Prop;
- b. Thirty-one Thousand Five Hundred Eighty-six and 87/100 Dollars (\$31,586.87) seized from the Bank of America account number ending in 7577 in the name of Lewis Revenue Group L.L.C.; and
- c. a money judgment in an amount to be determined, representing the amount of proceeds obtained from the offenses to which he is pleading.


All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Rule 32.2(a), Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: August 28, 2020

MATTHEW G.T. MARTIN
United States Attorney


BY: MEREDITH C. RUGGLES
Assistant United States Attorney

ROBERT ZINK
Chief, Fraud Section
United States Department of Justice
Criminal Division


BY: DAVID A. STIER
Trial Attorney