

FILED

APR 29 2021

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 TERRENCE L. POUNDS, )  
 CHARLES B. TILLER, III, )  
 TERRI DAVIS, )  
 RANDOLPH NUNN, )  
 SAMIRA ABDUL-KARIM, )  
 QUWAN SIMMONS, )  
 )  
 Defendants. )

INDICTMENT

JUDGE BARKER

CASE NO. **5:21CR317**

Title 18, United States Code,  
Sections 1343, 1349, 1957,  
and 2

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

*The Defendants*

1. Defendant TERRENCE L. POUNDS resided in Holland, Ohio, in the Northern District of Ohio.
2. Defendant CHARLES B. TILLER, III resided in Columbus, Ohio.
3. Defendant TERRI DAVIS resided in Old Hickory, Tennessee.
4. Defendant RANDOLPH NUNN resided in Canton, Ohio, in the Northern District of Ohio, Eastern Division.
5. Defendant SAMIRA ABDUL-KARIM resided in New Haven, Connecticut.
6. Defendant QUWAN SIMMONS resided in Hartford, Connecticut.

*The United States Small Business Administration and the CARES Act*

7. The United States Small Business Administration (“SBA”) was an executive branch agency of the United States government. The mission of the SBA was to maintain and strengthen the nation’s economy by enabling the establishment and viability of small businesses and assist in the economic recovery of communities after disasters. As part of this effort, the SBA enabled and provided for loans through banks and other lenders. These loans had government backed guarantees.

8. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or around March 2020 and was designed to provide emergency financial assistance to Americans suffering the economic effects caused by the COVID-19 pandemic. One source of relief under the CARES Act was authorization for the SBA to issue loans to small businesses and non-profit entities experiencing revenue loss due to the pandemic.

9. One form of such assistance was the Economic Injury Disaster Loan (“EIDL loan”) program, which provided loan assistance for certain businesses negatively affected by the COVID-19 pandemic. To qualify for an EIDL loan, a business had to, among other requirements, be in operation prior to February 1, 2020.

10. Applicants for EIDL loans used the SBA online portal to submit their application materials. The SBA servers that processed the EIDL loan applications were based in the state of Iowa.

11. Applicants had to certify that the information in the application was true and correct, under the penalty of perjury and applicable criminal statutes. The application process involved filling out data fields relating to the size and ownership of the affected business entity, and other information about the relevant business for the 12 months prior to COVID-19

impacting the national economy, such as the number of employees in the business, the gross business revenues realized, and the cost of goods sold. This information, submitted by the applicant, was then used by SBA systems to calculate the amount of money the applicant was eligible to receive.

12. Non-profit applicants and non-agricultural for-profit applicants were both generally eligible to receive an EIDL loan of up to \$150,000, with a 30-year scheduled repayment, deferred for 12 months.

13. Any funds paid by the SBA under an EIDL loan were processed and issued from the state of Colorado and sent to the applicant borrower's financial institution.

14. Pursuant to the provisions governing the EIDL program, loan proceeds could only be used by the affected business receiving EIDL loans for certain permissible expenses. The loans could be used by the business to pay fixed debts, payroll, accounts payable, and other bills that could have been paid had the COVID-19 disaster not occurred.

15. Another form of assistance provided by the CARES Act was the authorization of United States taxpayer funds in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program ("PPP").

16. To obtain a PPP loan a qualifying business was required to submit a PPP loan application, signed by an authorized representative of the business. The PPP loan application required the small business, through its authorized representative, to acknowledge the program rules and make certain affirmative certifications to be eligible to obtain the PPP loan. In the PPP loan application, the small business, through its authorized representative, was required to provide, among other things, its average monthly payroll expenses and number of employees. These figures were used to calculate the amount of money the small business was eligible to

receive under the PPP. In addition, businesses applying for a PPP loan were required to provide documentation showing their payroll expenses.

17. PPP loan applications were processed by a participating financial institution. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies, which were 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, was transmitted by the lender to the SBA in the course of processing the loan.

18. PPP loan proceeds could only be used by the business on certain permissible expenses, such as payroll costs, interest on mortgages, rent and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven if the business spent the loan proceeds on the allowable expenses within a designated period of time and used a certain percentage of the PPP loan proceeds towards payroll expenses.

*Relevant Financial Institutions*

19. Bank 1 was a financial institution based in Salt Lake City, Utah, and an approved SBA lender of PPP loans.

20. Bank 2 was a financial institution based in Fort Lee, New Jersey, and an approved SBA lender of PPP loans.

21. Bank 3 was a financial institution based in Canton, Ohio. NUNN controlled a bank account at Bank 3 ending in 8495.

22. Bank 4 was a financial institution based in Hartford, Connecticut. ABDUL-KARIM controlled bank accounts at Bank 4, including one ending in 4156.

23. Bank 5 was a financial institution based in New York, New York, with bank branches in Ohio and Connecticut. POUNDS controlled bank accounts at Bank 5, including

those ending in 9652 and 8356. SIMMONS controlled a bank account at Bank 5, ending in 2622.

24. Bank 6 was a financial institution based in The Woodlands, Texas, with bank branches in Ohio. TILLER controlled a bank account at Bank 6, ending in 6061.

25. Bank 7 was a financial institution based in Cincinnati, Ohio, with bank branches in Tennessee. DAVIS controlled bank accounts at Bank 7, including an account ending in 4313.

26. Bank Processor 1 was a third-party company processor, based in Redwood City, California, that processed PPP loan applications for Bank 1 and Bank 2.

COUNT 1

(Conspiracy to Commit Wire Fraud, 18 U.S.C. § 1349)

The Grand Jury charges:

27. The factual allegations of paragraphs 1 through 26 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

The Conspiracy

28. From on or about March 31, 2020, through on or about December 17, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants TERRENCE L. POUNDS, CHARLES B. TILLER, III, TERRI DAVIS, RANDOLPH NUNN, SAMIRA ABDUL-KARIM, QUWAN SIMMONS, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree to devise a scheme and artifice to defraud and to obtain money and property from the United States Small Business Administration, and from financial institutions, including Bank 1 and Bank 2, by means of false and fraudulent pretenses, representations and promises; and for the purpose of executing the scheme and artifice, transmitted and caused to be transmitted by means of wire communications

in interstate commerce writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

Objects of the Conspiracy

29. The objects of the conspiracy were for the conspirators to unjustly enrich themselves by obtaining EIDL and PPP loan proceeds under false pretenses, and to prevent detection of the conspiracy.

Manner and Means of the Conspiracy

30. It was part of the conspiracy that:

a. POUNDS recruited TILLER, DAVIS, NUNN, ABDUL-KARIM, SIMMONS, and others known and unknown to the Grand Jury, to obtain COVID-19 relief loans under false pretenses.

b. TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS provided POUNDS, directly and through others, their personal identifying information, which POUNDS used to apply for EIDL loans in their names.

c. In exchange for providing POUNDS with their personal identifying information, TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS paid POUNDS a portion of the fraudulent loan proceeds that they received.

d. POUNDS created email accounts and used them to submit fraudulent EIDL loan applications to the SBA in the names of TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS.

e. POUNDS falsely claimed in the EIDL loan applications that TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS each operated a non-profit organization that

was a “Faith Based Organization” and “Church” with \$1,000,000 in revenue, 15 employees, had goods that cost between \$300,000 and \$301,123, and was formed on January 1, 2019.

f. Based on the false information that POUNDS submitted to the SBA, it approved TILLER’S, DAVIS’, NUNN’S, ABDUL-KARIM’S and SIMMONS’ EIDL loan applications. The loan proceeds were transmitted from the SBA to bank accounts that TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS controlled. TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS then provided portions of the loan proceeds to POUNDS, directly and through others.

g. TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS used EIDL loan proceeds for the benefit of themselves and others, and in a manner that was inconsistent with the purposes of the EIDL program.

h. POUNDS submitted and caused to be submitted a false and fraudulent EIDL loan application to the SBA in the name of a religious services entity that he purported to operate. When the SBA approved the application and paid the loan, POUNDS used the loan funds for purposes inconsistent with those of the EIDL program, including to purchase motor vehicles.

i. POUNDS and TILLER submitted and caused to be submitted PPP loan applications in the names of others that contained fraudulent supporting documentation, including fraudulent Schedule C tax records.

Acts in Furtherance of the Conspiracy

31. In furtherance of the conspiracy and to achieve its objectives, one or more members of the conspiracy committed the following acts, among others, in the Northern District of Ohio, Eastern Division, and elsewhere:

a. POUNDS electronically submitted an EIDL loan application, in the name of NUNN, using the SBA online portal, as set forth below:

Act in Furtherance	Approximate Date	Description of Transaction	Originating Location	Recipient and Location
i.	July 19, 2020	Submission of EIDL loan application in the name of NUNN	Florida	SBA, Iowa

b. POUNDS, together with NUNN, caused the SBA to disburse an EIDL loan to NUNN, as set forth below:

Act in Furtherance	Approximate Date	Description of Transaction	Originating Location	Recipient and Location
i.	July 21, 2020	Bank transfer from the SBA of approximately \$149,800	Colorado	NUNN, Ohio

c. NUNN, after receiving the EIDL loan described in the preceding paragraph, wired \$30,000 of the loan proceeds to POUNDS and transferred a total of \$65,000 of the funds from a personal bank account in the name of NUNN to a personal bank account at Bank 3 held in the name of NUNN's family member, Person 1, as set forth below:

Act in Furtherance	Approximate Date	Description of Transaction	Originating Location	Recipient and Location
i.	July 27, 2020	Wire transfer from NUNN of approximately \$30,000	Ohio	POUNDS, Ohio

Act in Furtherance	Approximate Date	Description of Transaction	Originating Account	Receiving Account
ii.	July 24, 2020	Funds transfer of \$25,000	NUNN account at Bank 3, ending 8495	Account at Bank 3 in the name of Person 1, ending 4219
iii.	July 27, 2020	Funds transfer of \$40,000	NUNN account at Bank 3, ending 8495	Account at Bank 3 in the name of Person 1, ending 4219



d. POUNDS electronically submitted an EIDL loan application, in the name of DAVIS, using the SBA online portal, as set forth below:

<b>Act in Furtherance</b>	<b>Approx. Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 22, 2020	Submission of EIDL loan application in the name of DAVIS	Florida	SBA, Iowa

e. POUNDS, together with DAVIS, caused the SBA to disburse an EIDL loan to DAVIS as set forth below:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 24, 2020	Bank transfer from the SBA of approximately \$149,700	Colorado	DAVIS, Tennessee

f. DAVIS, after receiving the EIDL loan described in the preceding paragraph, wired \$15,000 of the loan proceeds to POUNDS, as set forth below:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	August 21, 2020	Bank wire from DAVIS of approximately \$15,000	Tennessee	POUNDS, Ohio

g. POUNDS electronically submitted an EIDL loan application, in the name of ABDUL-KARIM, using the SBA online portal, as set forth below:

<b>Act in Furtherance</b>	<b>Approx. Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 15, 2020	Submission of EIDL loan application in the name of ABDUL-KARIM	Ohio	SBA, Iowa

h. POUNDS, together with ABDUL-KARIM, caused the SBA to disburse an EIDL loan to ABDUL-KARIM, as set forth below:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 21, 2020	Bank transfer from the SBA of approximately \$149,600	Colorado	ABDUL-KARIM, Connecticut

i. ABDUL-KARIM used proceeds from the EIDL loan described in the preceding paragraph to conduct the following financial transactions, among others:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>	<b>Financial Institution and Account</b>
i.	July 22, 2020	\$50,000 debited by cashier check	Bank 4, transaction debited from account ending 4156
ii.	August 31, 2020	Purchase at Mohegan Sun Connecticut \$217.35	Bank 4, transaction debited from account ending 4156
iii.	September 1, 2020	ATM withdrawal at Mohegan Sun Connecticut \$505.95	Bank 4, transaction debited from account ending 4156

j. POUNDS electronically submitted an EIDL loan application in the name of SIMMONS, using the SBA online portal, as set forth below:

<b>Act in Furtherance</b>	<b>Approx. Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 15, 2020	Submission of EIDL loan application in the name of SIMMONS	Ohio	SBA, Iowa

k. POUNDS, together with SIMMONS, caused the SBA to disburse an EIDL loan to SIMMONS, as set forth below:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 21, 2020	Bank transfer from the SBA of approximately \$149,700	Colorado	SIMMONS, Connecticut

i. SIMMONS used proceeds from the EIDL loan described in the preceding paragraph to carry out the following financial transactions, among others:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>	<b>Financial Institution and Account</b>
i.	July 23, 2020	EWithdrawal, \$30,000	Bank 5, transaction debited from account ending 2622
ii.	July 30, 2020	Purchase at Hannoush Jewelers, \$957.15	Bank 5, transaction debited from account ending 2622
iii.	July 31, 2020	Purchase at Louis Vuitton, \$627.47	Bank 5, transaction debited from account ending 2622
iv.	August 10, 2020	Purchase at Liquor Outlet, \$233.95	Bank 5, transaction debited from account ending 2622
v.	October 13, 2020	Purchase at Gamestop, \$117.00	Bank 5, transaction debited from account ending 2622

m. POUNDS electronically submitted an EIDL loan application, in the name of TILLER, using the SBA online portal, as set forth below:

<b>Act in Furtherance</b>	<b>Approx. Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 15, 2020	Submission of EIDL loan application in the name of TILLER	Ohio	SBA, Iowa

n. POUNDS, together with TILLER, caused the SBA to disburse an EIDL loan to TILLER, as set forth below:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 21, 2020	Bank transfer from the SBA of approximately \$149,700	Colorado	TILLER, Ohio

o. TILLER, after receiving the EIDL loan described in the preceding paragraph, wired \$19,000 of the proceeds to POUNDS, as set forth below:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>	<b>Originating Location</b>	<b>Recipient and Location</b>
i.	July 31, 2020	Bank wire from TILLER of approximately \$19,000	Ohio	POUNDS, Ohio

p. On or about May 2, 2020, POUNDS emailed TILLER a fraudulent Schedule C tax document in the name of TERRI DAVIS for the year 2019, falsely purporting to demonstrate that DAVIS operated a business that earned \$99,500 by providing consulting work for ‘CBD4Real,’ a business that POUNDS owned and operated in Toledo, Ohio.

q. TILLER caused to be submitted a loan application in the name of DAVIS, to Bank Processor 1, seeking a PPP loan from Bank 1 and Bank 2, and which contained false information, including the fraudulent Schedule C tax document described in the preceding paragraph, as set forth below:

<b>Act in Furtherance</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>
i.	May 5, 2020	Submission of PPP loan application in the name of DAVIS

r. On or about March 31, 2020, POUNDS electronically submitted and caused to be submitted to the SBA an EIDL loan application for “Truth Ministries Global Inc.,” a

purported “Faith Based Organization” and “Church” that POUNDS claimed to operate. In the loan application, POUNDS claimed, “We feed the less fortunate and underprivileged, we visit the prisons, we have 24 hours per day and 7 days per week phone line open for prayers and counseling. We have church services twice per week.”

s. On or about May 22, 2020, the SBA, in response to the application described in the preceding paragraph, funded an EIDL loan for Truth Ministries Global Inc. in the amount of \$147,900, which POUNDS received from the SBA into an account at Bank 5 that he controlled, ending in 9652. POUNDS then used portions of these loan proceeds to purchase and cause to be purchased the following motor vehicles: a 2021 Chevrolet Tahoe, VIN 1GNSKPKD2MR102954; a 2021 Kia Telluride, VIN 5XYP5DHC3MG118064; and a 2020 Hyundai Elantra, VIN KMHD84LF6LU024572.

t. On or about August 15, 2020, POUNDS purchased a 2020 BMW X4, VIN 5YMUJ0C09L9B57885, using portions of EIDL loans that he received from others in return for fraudulently obtaining from the SBA the loans in the names of, and for, these individuals.

32. As a result of the conspiracy described above, POUNDS, TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS, together with others, submitted and caused to be submitted fraudulent PPP loan applications, and at least 60 fraudulent EIDL loan applications, seeking a total of approximately \$9 million in PPP and EIDL loan proceeds, and the SBA approved approximately \$3.3 million in loan funds.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-10  
(Wire Fraud, 18 U.S.C. § 1343)

The Grand Jury further charges:

33. The factual allegations of paragraphs 1 through 14 and paragraphs 21 through 25 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

The Fraudulent Scheme

34. From on or about March 31, 2020, through on or about December 17, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants TERRENCE L. POUNDS, CHARLES B. TILLER, III, TERRI DAVIS, RANDOLPH NUNN, SAMIRA ABDUL-KARIM and QUWAN SIMMONS knowingly devised, and intended to devise, a scheme and artifice to defraud the United States Small Business Administration, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, by submitting and causing to be submitted false and fraudulent applications for EIDL funds.

Manner and Means of the Scheme to Defraud

35. To accomplish these objectives, POUNDS, TILLER, DAVIS, NUNN, ABDUL-KARIM and SIMMONS employed the manner and means described in paragraph 30(a)-(h) of this Indictment, which are re-alleged and incorporated by reference as if fully set forth herein.

Execution of the Scheme

36. On or about each of the dates set forth below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants TERRENCE L. POUNDS, CHARLES B. TILLER, III, TERRI DAVIS, RANDOLPH NUNN, SAMIRA ABDUL-KARIM and QUWAN SIMMONS, for the purpose of executing the scheme and artifice to defraud described above, and attempting to do so, transmitted, and caused to be transmitted, writings, signs, signals, pictures

and sounds by means of wire communications in interstate commerce, as described below, each transmission constituting a separate count of this Indictment:

<b>Count</b>	<b>Approximate Date</b>	<b>Description of Transmission</b>	<b>Originating Location</b>	<b>Recipient and Location</b>	<b>Defendants</b>
2	May 22, 2020	Bank transfer from the SBA of \$147,900 for EIDL loan in the name of Truth Ministries Global Inc.	Colorado	TERRENCE L. POUNDS, Ohio	TERRENCE L. POUNDS
3	July 12, 2020	Electronic submission of EIDL loan application in the name of Person 2	Ohio	SBA, Iowa	TERRENCE L. POUNDS
4	July 15, 2020	Electronic submission of EIDL loan application in the name of Person 3	Ohio	SBA, Iowa	TERRENCE L. POUNDS
5	July 15, 2020	Electronic submission of EIDL loan application in the name of SAMIRA ABDUL-KARIM	Ohio	SBA, Iowa	TERRENCE L. POUNDS / SAMIRA ABDUL-KARIM
6	July 15, 2020	Electronic submission of EIDL loan application in the name of QUWAN SIMMONS	Ohio	SBA, Iowa	TERRENCE L. POUNDS / QUWAN SIMMONS
7	July 21, 2020	Bank transfer from the SBA of \$149,800 for EIDL loan in the name of RANDOLPH NUNN	Colorado	RANDOLPH NUNN, Ohio	TERRENCE L. POUNDS / RANDOLPH NUNN

Count	Approximate Date	Description of Transmission	Originating Location	Recipient and Location	Defendants
8	July 21, 2020	Bank transfer from the SBA of \$149,700 for EIDL loan in the name of CHARLES B. TILLER, III	Colorado	CHARLES B. TILLER III, Ohio	CHARLES B. TILLER, III / TERRENCE L. POUNDS
9	July 24, 2020	Bank transfer from the SBA of \$149,800 for EIDL loan in the name of Person 4	Colorado	Person 4, Ohio	TERRENCE L. POUNDS
10	August 21, 2020	Bank wire from Terri Davis of approximately \$15,000	Tennessee	TERRENCE L. POUNDS, Ohio	TERRENCE L. POUNDS / TERRI DAVIS

All in violation of Title 18, United State Code, Section 1343.

COUNTS 11-12

(Engaging in a Monetary Transaction  
in Property Derived from Criminal Activity, 18 U.S.C. §§ 1957 and 2)

The Grand Jury further charges:

37. The factual allegations of paragraphs 1 through 26 and paragraph 30(a)-(i) of this Indictment are realleged and incorporated by reference as if fully set forth herein.

38. On or about the dates set forth below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants TERRENCE L. POUNDS and RANDOLPH NUNN, aiding and abetting each other, did knowingly engage in and attempt to engage in the following financial transactions by, through, and to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349, as alleged in Count 1 of this Indictment, and Wire Fraud,



in violation of Title 18, United States Code, Section 1343, as alleged in Count 7 of this

Indictment, each transaction constituting a separate count of this Indictment:

<b>Count</b>	<b>Date</b>	<b>Approx. Amount</b>	<b>Originating Financial Institution and Account (Located in the Northern District of Ohio) and Nature of Transaction</b>	<b>Account of Deposit</b>	<b>Defendants</b>
11	July 27, 2020	\$30,000	Bank 3, account controlled by NUNN ending 8495, wire transfer	Bank 5, account controlled by POUNDS ending 8356	RANDOLPH NUNN / TERRENCE L. POUNDS
12	July 27, 2020	\$40,000	Bank 3, account controlled by NUNN, ending 8495, funds transfer	Bank 3, account in the name of Person 1, ending 4219	RANDOLPH NUNN

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 13

(Engaging in a Monetary Transaction  
in Property Derived from Criminal Activity, 18 U.S.C. §§ 1957 and 2)

The Grand Jury further charges:

39. The factual allegations of paragraphs 1 through 26, and paragraph 30(a)-(i) of this Indictment are realleged and incorporated by reference as if fully set forth herein.

40. On or about the date set forth below, in the Northern District of Ohio and elsewhere, Defendants TERRI DAVIS and TERRENCE L. POUNDS, aiding and abetting each other, did knowingly engage in and attempt to engage in the following financial transaction by, through, and to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, Conspiracy to Commit Wire Fraud, in violation of Title 18, United

States Code, Section 1349, as alleged in Count 1 of this Indictment, and Wire Fraud in violation of Title 18, United States Code, Section 1343, as alleged in Count 10 of this Indictment:

<b>Count</b>	<b>Date</b>	<b>Approx. Amount</b>	<b>Originating Financial Institution, Account, and Nature of Transaction</b>	<b>Financial Institution and Account of Deposit (Located in the Northern District of Ohio)</b>
13	August 21, 2020	\$15,000	Bank 7, account controlled by DAVIS ending 4313, wire transfer	Bank 5, account controlled by POUNDS ending 8356

In violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 14

(Engaging in a Monetary Transaction  
in Property Derived from Criminal Activity, 18 U.S.C. §§ 1957 and 2)

The Grand Jury further charges:

41. The factual allegations of paragraphs 1 through 26, and paragraph 30(a)-(i) of this Indictment are realleged and incorporated by reference as if fully set forth herein.

42. On or about the date set forth below, in the Northern District of Ohio and elsewhere, Defendants CHARLES B. TILLER, III and TERRENCE L. POUNDS, aiding and abetting each other, did knowingly engage in and attempt to engage in the following financial transaction by, through, and to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349, as alleged in Count 1 of this Indictment, and Wire Fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count 8 of this Indictment:

<b>Count</b>	<b>Date</b>	<b>Approx. Amount</b>	<b>Originating Financial Institution, Account, and Nature of Transaction</b>	<b>Financial Institution and Account of Deposit (Located in Northern District of Ohio)</b>
14	July 31, 2020	\$19,000	Bank 6, account controlled by TILLER ending 6061, wire transfer	Bank 5, account controlled by POUNDS ending 8356

In violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE

The Grand Jury further charges:

43. The allegations of Counts 1 through 14 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1); and Title 28, United States Code, Section 2461(c). As a result of the foregoing offenses, Defendants TERRENCE L. POUNDS, CHARLES B. TILLER, III, TERRI DAVIS, RANDOLPH NUNN, SAMIRA ABDUL-KARIM, and QUWAN SIMMONS, shall forfeit to the United States all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of the offenses charged herein; and any and all property, real or personal, involved in the offenses charged herein, or any property traceable to such property; including, but not limited to, the following:

- a. 2020 BMW X4, VIN 5YMUJ0C09L9B57885;
- b. 2021 Chevrolet Tahoe, VIN 1GNSKPKD2MR102954;
- c. 2021 Kia Telluride, VIN 5XYP5DHC3MG118064; and,
- d. 2020 Hyundai Elantra, VIN KMHD84LF6LU024572.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.