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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : Hon. Jessica S. Allen  
 :  
 v. : Mag. No. 21-8190  
 :  
 JORDAN C. LARKINS : **CRIMINAL COMPLAINT**


I, Postal Inspector David Arminio, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Postal Inspector with the United States Postal Inspection Service and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.



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Postal Inspector David Arminio  
United States Postal Inspection Service

Postal Inspector David Arminio attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on September 13, 2021 in New Jersey.

September 13, 2021 at  
Newark, New Jersey

HONORABLE JESSICA S. ALLEN  
UNITED STATES MAGISTRATE JUDGE

S/Jessica S. Allen  

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Signature of Judicial Officer

**ATTACHMENT A**

**Counts One Through Three**  
**(Bank Fraud)**

From at least in or about June 2020 through in or about July 2020, in Middlesex and Union Counties, in the District of New Jersey and elsewhere, defendant

**JORDAN C. LARKINS**

did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud one or more financial institutions, as defined by 18 U.S.C. § 20, to wit: Lender 1 and Lender 2, the deposits of which were each insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the control of such financial institutions by means of materially false and fraudulent pretenses, representations, and promises.

| <b>Count</b> | <b>Approximate Date</b> | <b>Description</b>   |
|--------------|-------------------------|--|
| 1            | June 1, 2020            | LARKINS submitted a fraudulent loan application for Paycheck Protection Program (“PPP”) funds on behalf of Silver Star Advisors, Inc. to Lender 1 and obtained approximately \$280,830 in PPP funds. |
| 2            | June 5, 2020            | LARKINS submitted a fraudulent loan application for PPP funds on behalf of Agro Development Consulting, Inc. to Lender 1 and obtained approximately \$151,890 in PPP funds.                          |
| 3            | June 29, 2020           | LARKINS submitted a fraudulent loan application for PPP funds on behalf of MVP Advisors, LLC to Lender 2 and obtained approximately \$284,850 in PPP funds.  |

In violation of Title 18, United States Code, Sections 1344(2) and 2.

**Counts Four Through Ten**  
**(Wire Fraud)**

From at least in or about May 2020 through at least in or about June 2020, in Middlesex and Union Counties, in the District of New Jersey and elsewhere, defendant

**JORDAN C. LARKINS**

knowingly and intentionally devised and intended 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, and, for the purpose of executing and attempting to execute such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, the following writings, signs, signals, pictures, and sounds:

| <b>Count</b> | <b>Approximate Date</b> | <b>Description of Wire</b>   |
|--------------|-------------------------|--|
| 4            | May 18, 2020            | LARKINS submitted a fraudulent loan application for Economic Injury Disaster Loan (“EIDL”) funds to the Small Business Administration (the “SBA”) on behalf of Agri Link International, Inc. causing the SBA to deposit approximately \$149,900 in EIDL funds into LARKINS’s bank account via interstate wire transmission through the District of New Jersey. |
| 5            | May 20, 2020            | LARKINS submitted a fraudulent loan application for EIDL funds to the SBA on behalf of Silver Star Advisors, Inc. causing the SBA to deposit approximately \$149,900 in EIDL funds into LARKINS’s bank account via interstate wire transmission through the District of New Jersey.  |
| 6            | May 20,2020             | LARKINS submitted a fraudulent loan application for EIDL funds to the SBA on behalf of Silver Star Advisors, Inc. causing the SBA to deposit approximately \$10,000 in EIDL funds into LARKINS’s bank account via interstate wire transmission through the District of New Jersey.   |
| 7            | June 21, 2020           | LARKINS submitted a fraudulent loan application for EIDL funds to the SBA on behalf of MVP Advisors, LLC, causing the SBA to deposit approximately \$149,900 in EIDL into LARKINS’s bank account via interstate wire transmission through the District of New Jersey.  |

|    |               |  |
|----|---------------|--|
| 8  | June 21, 2020 | LARKINS submitted a fraudulent loan application for EIDL funds to the SBA on behalf of MVP Advisors, LLC causing the SBA to deposit approximately \$10,000 in EIDL funds into LARKINS's bank account via interstate wire transmission through the District of New Jersey.              |
| 9  | June 24, 2020 | LARKINS submitted a fraudulent loan application for EIDL funds to the SBA on behalf of Capital Logistics Group, Inc. causing the SBA to deposit approximately \$149,900 in EIDL funds into LARKINS's bank account via interstate wire transmission through the District of New Jersey. |
| 10 | June 24, 2020 | LARKINS submitted a fraudulent loan application for EIDL funds to the SBA on behalf of Capital Logistics Group causing the SBA to deposit approximately \$10,000 in EIDL funds into LARKINS's bank account via interstate wire transmission through the District of New Jersey.        |

In violation of Title 18, United States Code, Sections 1343 and 2

**Counts Eleven and Twelve**  
**(Money Laundering)**

On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

**JORDAN C. LARKINS**

did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a greater value than \$10,000, that is, the transfer of U.S. currency from bank accounts to the other bank accounts, cash withdrawals, foreign bank transfers (defined in Attachment B), such property having been derived from a specified unlawful activity, that is, wire fraud in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344.

| <b>Count</b> | <b>Approximate Date</b> | <b>Description of Monetary Transaction</b>   |
|--------------|-------------------------|--|
| 11           | June 11, 2020           | Transfer from the Silver Star Advisors, Inc. bank account at Bank 1 ("Silver Star Account 2") in the amount of approximately \$51,000 to a bank account located in the country of Ghana. |
| 12           | June 29, 2020           | Transfer from the MVP Advisors, LLC bank account at Bank 1 ("MVP Advisors Account 1") in the amount of approximately \$51,000 to a Silver Star Account 2.                                |

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

## **ATTACHMENT B**

I, David Arminio, a Postal Inspector with the United States Postal Inspection Service, having conducted an investigation and having discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause. Unless specifically indicated, all dates described in this affidavit are approximate and all statements or representations described in this affidavit are related in substance and in part.

### **Overview**

1. From on or about May 18, 2020 through on or about June 29, 2020, defendant JORDAN C. LARKINS (“LARKINS”) used a variety of false statements and representations to fraudulently obtain approximately \$1.3 million in federal COVID-19 emergency relief loans meant for distressed small businesses. To obtain the loans, LARKINS submitted falsified loan applications to two different lenders and the SBA on behalf of LARKINS’s purported businesses. On these loan applications, LARKINS falsified various types of information associated with his purported businesses, including: the number of employees; bank records; the identities of the owners and other individuals associated with the applications; and federal tax returns. LARKINS then misused the loan proceeds, including by purchasing various luxury items and services, transferring money overseas, and withdrawing large sums of cash.

### **Background**

#### ***The Paycheck Protection Program and Economic Insurance Disaster Loans***

2. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act is a federal law enacted in or about March 2020 and designed to provide emergency financial assistance to the millions of Americans who are suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program (“PPP”). In or around April 2020, Congress authorized over \$300 billion in additional PPP funding.

3. 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 small business must state, among other things, its: (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 showing their payroll expenses.

4. 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 money, which is 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 transmitted by the lender to the SBA in the course of processing the loan.

5. PPP loan proceeds must be used by the business on certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal on the PPP loan to be entirely forgiven if the business spends the loan proceeds on these expense items within a designated period of time after receiving the proceeds and uses a certain amount of the PPP loan proceeds on payroll expenses.

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

7. The CARES Act authorized the SBA to provide EIDLs of up to \$2 million to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic.

8. In order to obtain an EIDL, a qualifying business must 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. In the case of EIDLs for COVID-19 relief, the 12-month period constitutes the 12 months preceding January 31, 2020. In addition, the business entity must have existed in an operational condition on February 1, 2020.

9. The amount of the EIDL is determined based, in part, on the information the applicant provides regarding the revenue, employees, and cost of goods of the company. The SBA directly issues any funds disbursed under an EIDL to the applicant company. A company may use EIDL funds for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments. If an applicant also obtains a loan under the PPP, the applicant company is prohibited from using EIDL funds for the same purpose as the PPP funds.

***The Defendant, Relevant Entities, and Individuals***

10. At all times as relevant to this Complaint:
  - a. LARKINS was a resident of Edison and Somerset, New Jersey and controlled or established the following entities through which he fraudulently applied for PPP and EIDL funds:
    - i. Silver Star Advisors, Inc. (“Silver Star”), which was a Wyoming corporation that purported to provide retail and internet services.
    - ii. Agro Development Consulting Inc. (“Agro Development”), which was a Florida corporation that purported to provide agriculture or engineering services.
    - iii. MVP Advisors, LLC (“MVP Advisors”), which was a New Jersey limited liability company that purported to provide business and advertising services, including printing and graphic design services.
    - iv. Capital Logistics Group (“Capital”), which was a New Jersey company that purported to provide freight and trailer transportation services.
    - v. Agri Link International, Inc. (“Agri Link”), which was New Jersey corporation, that purported to provide agriculture services.
  - b. Lender 1 was a financial institution insured by the Federal Deposit Insurance Corporation (“FDIC”) headquartered in New Jersey.
  - c. Lender 2 was an FDIC-insured financial institution headquartered in San Francisco, California.
  - d. Bank 1 was a financial institution headquartered in Boston, Massachusetts.



**The Scheme to Defraud**

11. From at least in or about May 2020 through at least in or about June 2020, LARKINS submitted, or caused to be submitted, fraudulent loan applications to approved lenders, including Lender 1, Lender 2, and the SBA, in order to fraudulently obtain funds through the PPP and EIDL programs.

12. In connection with this fraud, LARKINS submitted, or caused to be submitted, the following PPP and EIDL applications to Lender 1, Lender 2, and the SBA:

| <b>Name of Business Applicant</b> | <b>Amount Approved</b> | <b>Lender</b> | <b>Approximate Date Funded</b> | <b>Status</b> |
|-----------------------------------|------------------------|---------------|--------------------------------|---------------|
| Silver Star                       | \$280,830.00           | Lender 1      | June 3, 2020                   | Funded        |
| Agro Development                  | \$151,890.00           | Lender 1      | June 9, 2020                   | Funded        |
| MVP Advisors                      | \$149,900.00           | SBA           | June 23, 2020                  | Funded        |
| Capital                           | \$149,900.00           | SBA           | June 25, 2020                  | Funded        |
| Silver Star                       | \$10,000.00            | SBA           | June 26, 2020                  | Funded        |
| MVP Advisors                      | \$10,000.00            | SBA           | July 1, 2020                   | Funded        |
| Capital                           | \$10,000.00            | SBA           | July 6, 2020                   | Funded        |
| MVP Advisors                      | \$284,850.00           | Lender 2      | July 9, 2020                   | Funded        |
| Silver Star                       | \$149,900.00           | SBA           | July 14, 2020                  | Funded        |
| Agri Link                         | \$149,900.00           | SBA           | July 24, 2020                  | Funded        |

### ***Falsified Agri Link EIDL Application to the SBA***

13. On or about May 18, 2020, LARKINS submitted an EIDL application to the SBA in the name of Agri Link seeking an EIDL in the amount of approximately \$149,900. The application was submitted in the name of Individual-1, a fake name with a social security number associated with another unrelated individual. The EIDL application identified Individual-1 as Agri Link's owner.

14. LARKINS claimed that Agri Link had 45 employees; that the business's annual gross revenue for the 12-months prior to the disaster date, *i.e.*, January 31, 2019 through January 31, 2020, was approximately \$965,000; and that its cost of goods sold was approximately \$350,000. Social Security Administration ("SSA") records, however, revealed that Agri Link did not report any wages paid to employees for the period between 2018 and 2020. Nor did the Internal Revenue Service (the "IRS") receive from Agri Link any Transmittal of Wage and Tax Statements (IRS Forms W-3); Wage and Tax Statements (Forms W-2); Corporate Income Tax Returns (Forms 1120); or Employer's Annual Federal Unemployment Tax Return (Forms 940) between 2018 and 2020. IRS records also show that Agri Link did not file any Employer's Quarterly Federal Tax Returns (Forms 941) for the tax quarters of 2018 through 2020.

15. In addition, bank records revealed that on or about July 21, 2020, Agri Link opened its bank account with a starting balance of only approximately \$300, excluding the approximate \$149,900 in EIDL funds later received. This amount of deposited funds in the Agri Link account was significantly lower than the approximately \$965,000 in gross revenue that LARKINS claimed for the company on its EIDL loan application.

16. LARKINS submitted the application using the name of Individual-1 as the owner of Agri Link. SSA records revealed that the social security number listed for Individual-1 belonged to another individual and that there was no social security number associated with Individual-1's name.

17. Agri Link's bank account at Bank 1 is registered to the same address that LARKINS used as his address in connection with the other business bank accounts for Capital, Silver Star, MVP Advisors, and Agro Development at Bank 1. On or about July 22, 2020, LARKINS provided this bank account to the SBA for purposes of the EIDL application. This was the account funded with the loan proceeds. Specifically, the bank account was opened on or about July 21, 2020 in the name of Agri Link, with LARKINS's name, his personal identifiers, driver's license, and passport information. LARKINS was also listed as the owner of the company. In addition, the certificate of incorporation for Agri Link was attached to the bank opening documents and listed the incorporation date as July 21, 2020. The certificate listed LARKINS—and not Individual-1—as the registered agent and board of directors. The certificate also provides the same address that was listed in the bank

account application.

18. Bank records show that on or about July 24, 2020, LARKINS received the full loan amount of approximately \$149,900 into the Agri Link account at Bank 1.

19. On or about September 1, 2020 and September 2, 2020, LARKINS transferred approximately \$75,000 and approximately \$37,500, respectively, to a bank account for Silver Star, another purported company that LARKINS controlled and, as set forth below, identified himself as the owner of on its EIDL application to the SBA.

20. From on or about September 9, 2020, through on or about September 18, 2020, LARKINS withdrew a total of \$31,000 in funds from the Agri Link account at Bank 1.

### ***Falsified Silver Star EIDL Application to the SBA***

21. On or about May 20, 2020, LARKINS submitted an EIDL application to the SBA in the name of Silver Star seeking an EIDL Loan in the amount of approximately \$149,900 and an advance of approximately \$10,000. The application was submitted in LARKINS's name and listed his social security number and date of birth.

22. LARKINS claimed that Silver Star had 25 employees; that the business's annual gross revenue for the prior 12-month period prior to the disaster, *i.e.*, January 31, 2019 through January 31, 2020, was approximately \$1.5 million; and that its cost of goods sold was approximately \$50,000. SSA records, however, revealed that Silver Star did not report any wages paid to employees for the period between 2018 and 2020. Nor did the IRS receive any Transmittal of Wage and Tax Statements (IRS Forms W-3); Wage and Tax Statements (Forms W-2); Corporate Income Tax Returns (Forms 1120); or Employer's Annual Federal Unemployment Tax Return (Forms 940) between 2018 and 2020. IRS records also show that Silver Star did not file any Employer's Quarterly Federal Tax Returns (Forms 941) for the tax quarters of 2018 through 2020.

23. In addition, bank records revealed that Silver Star's bank account a Bank 1 ("Silver Sar Account 1") had a starting balance of approximately \$5 on February 3, 2020 and, on or about June 22, 2020, Silver Star had total deposits of approximately \$147.24, excluding the approximate \$149,900 in EIDL funds and \$10,000 advance later received. This amount of deposited funds in the Silver Star's bank account was significantly lower than the approximately \$1.5 million in gross revenue that LARKINS claimed for the company on its EIDL loan application.

24. Bank records show that on or about June 26, 2020, LARKINS received the full EIDL advance amount of approximately \$10,000 into the Silver Star Account

1 at Bank 1. The full loan amount of approximately \$149,900 was received on July 14, 2020.

25. Upon receiving the loan proceeds, LARKINS then transferred the loan proceeds and made payments from Silver Star Account 1 at Bank 1 as follows:

- a. From on or about July 1, 2020 through on or about July 3, 2020, LARKINS withdrew for a total of approximately \$3,615 in cash.
- b. On or about July 6, 2020, LARKINS spent approximately \$4,134 at a luxury retail store.
- c. From on or about June 29, 2020 through on or about July 13, 2020, LARKINS had approximately \$1,143 in various other miscellaneous transactions.
- d. On or about July 14, 2020, LARKINS received the full loan amount of approximately \$149,900. Upon receiving this amount, LARKINS transferred the loan proceeds as follows:
  - i. On or about July 17, 2020, LARKINS withdrew a total of approximately \$2,500 in cash.
  - ii. On or about July 21, 2020, LARKINS withdrew a total of approximately \$15,100 in cash.
  - iii. On or about July 22, 2020, LARKINS withdrew a total of approximately \$2,500 in cash.
  - iv. On or about that same date, LARKINS made a purchase at a furniture store for approximately \$5,217.08.
  - v. On or about July 24, 2020 LARKINS transferred approximately \$16,000 to Silver Star Account 2.
  - vi. On or about August 3, 2020, LARKINS transferred approximately \$29,000 to Silver Star Account 2 at Bank 1.
  - vii. On or about August 28, 2020, LARKINS transferred a wire of approximately \$40,000 to an investment company.

26. On September 1, 2020, LARKINS transferred approximately \$75,000 from Agri Link's loan proceeds to Silver Star Account 1. Upon receipt of this transfer or soon thereafter, LARKINS wired a total of approximately \$77,000 into an investment company.

### ***Falsified Silver Star PPP Application to Lender 1***

27. On or about June 1, 2020, LARKINS submitted a PPP application to Lender 1 in the name of Silver Star seeking a PPP loan in the amount of approximately \$280,830. The application was submitted in LARKINS's name and listed LARKINS as the owner along with his personal identifiers.

28. LARKINS claimed that Silver Star had 49 employees and that the business's average monthly payroll was approximately \$112,332. LARKINS also provided an Employer's Quarterly Federal Tax Return (IRS Form 941) for the fourth quarter of 2019 that reflected these same figures. SSA records, however, revealed that Silver Star did not report any wages paid to employees for the period between 2018 and 2020. Nor did the IRS receive any Transmittal of Wage and Tax Statements (IRS Forms W-3); Wage and Tax Statements (Forms W-2); Corporate Income Tax Returns (Forms 1120); or Employer's Annual Federal Unemployment Tax Return (Forms 940) between 2018 and 2020. IRS records also show that Silver Star did not file any Employer's Quarterly Federal Tax Returns (Forms 941) for the tax quarters of 2018 through 2020.

29. In addition, as part of the application, LARKINS provided a purported February 2020 bank account statement for Silver Star which showed a balance of approximately \$390,944.72. Bank records, however, revealed that the largest balance the account held during the month of February 2020 was approximately \$60. And at the time the PPP loan was funded—on June 3, 2020—the Silver Star Account 1 had a balance of approximately \$405, excluding the PPP loan proceeds.

30. Bank records show that on or about June 3, 2020, LARKINS received the full loan amount of approximately \$280,830 into the Silver Star Account 1 at Bank 1.

31. LARKINS then transferred the loan proceeds and made payments from Silver Star Account 1 at Bank 1 as follows:

- a. On the same day the PPP funds were deposited into Silver Star Account 1 bank account, LARKINS transferred the full loan amount into Silver Star Account 2 at Bank 1.
- b. Using Silver Star Account 2 at Bank 1, LARKINS then made the following transfers:
  - i. On or about June 4, 2020 and June 5, 2020 LARKINS withdrew a total of approximately \$35,000 in cash.
  - ii. On or about June 11, 2020 and again on or about June 29, 2020, LARKINS transferred approximately \$51,000—for a total of approximately \$102,000—to a bank in the country of Ghana.

- iii. On or about July 3, 2020, LARKINS transferred \$51,000 to a bank in Ghana.
- iv. On or about July 6, 2020, LARKINS withdrew approximately \$10,000 in cash.
- v. On or about July 7, 2020, LARKINS made a purchase at a luxury retail store for \$5,941.
- vi. On or about July 10, 2020, LARKINS made a purchase at a furniture store of approximately \$8,933.
- vii. On or about July 13, 2020 and July 15, 2020, LARKINS withdrew a total of approximately \$8,000 in cash.
- viii. On or about July 13, 2020, LARKINS transferred approximately \$50,000 to a bank in Ghana.
- ix. On or about July 14, 2020, LARKINS transferred approximately \$50,000 to a bank in Ghana.
- x. On or about July 24, 2020 LARKINS initiated a wire transfer from the Silver Star Account 1 at Bank 1 for approximately \$16,000 credit to Silver Star Account 2.
- xi. From on or about July 24, 2020 through on or about July 29, 2020, LARKINS withdrew a total of approximately \$14,370 in cash through a series of withdrawals.

### ***Falsified Agro Development PPP Application to Lender 1***

32. On or about June 5, 2020, LARKINS submitted a PPP application to Lender 1 in the name of Agro Development seeking a PPP loan in the amount of approximately \$151,890. The application was submitted in the name of Individual-2, a fake name with a social security number associated with another individual. The PPP application identified Individual-2 as Agro Development's owner.

33. LARKINS claimed that Agro Development had 38 employees and that the business's average monthly payroll was approximately \$60,756. LARKINS also provided an Employer's Quarterly Federal Tax Return (IRS Form 941) for the fourth quarter of 2019 that reflected these same figures. SSA records, however, revealed that Agro Development did not report any wages paid to employees for the period between 2018 and 2020. Nor did the IRS receive any Transmittal of Wage and Tax Statements (IRS Forms W-3); Wage and Tax Statements (Forms W-2); Corporate

Income Tax Returns (Forms 1120); or Employer's Annual Federal Unemployment Tax Return (Forms 940) between 2018 and 2020. IRS records also show that Agro Development did not file any Employer's Quarterly Federal Tax Returns (Forms 941) for the tax quarters of 2018 through 2020.

34. In addition, as part of the application, LARKINS provided falsified bank account records for an Agro Development bank account. Specifically, LARKINS included a falsified bank statement for February 2020 that indicated a balance of \$393,129. Bank records from Bank 1, however, show that this account was not opened until on or about June 2, 2020—four months after the date of the fraudulent statement that LARKINS submitted and had a starting balance of only \$60.

35. LARKINS submitted the application using the name of Individual-2 as the owner of Agro Development. SSA records, however, revealed the social security number listed for Individual-2 belonged to another individual and that there was no social security number associated with Individual-2's name. In addition, bank records for Agro Development's account at Bank 1 show that LARKINS opened and controlled the bank account listed on the application and that later received the loan proceeds. Specifically, the bank account was opened on or about June 2, 2020, only three days before LARKINS submitted the application, in the name of Agro Development, with LARKINS's name on the account and its signature card. On the bank account opening documents LARKINS listed himself as 80% owner and LARKINS listed Individual-2 as a 20% owner.

36. Bank records show that on or about June 9, 2020, Larkins received the full loan amount of approximately \$151,890 into the Agro Development account at Bank 1. This account was opened on June 2, 2020 with a starting balance of \$60.

37. Upon receiving the loan proceeds LARKINS then transferred the loan proceeds from Agro Development's account at Bank 1 as follows:

- a. On or about June 10, 2020, LARKINS transferred approximately \$93,834 to a third-party company.
- b. From on or about June 11, 2020 through on or about June 25, 2020, LARKINS withdrew a total of approximately \$53,100 in cash through a series of transactions.
- c. On or about June 22, 2020, LARKINS made a cash withdrawal to purchase a bank check for \$10,000 payable to a consulting company labeled as a "cash equivalent." This check was then deposited into another bank account that LARKINS controlled.
- d. In or about July 2020, LARKINS made a series of withdraws for a total of approximately \$28,000 in cash.

- e. On or about July 20, 2020, LARKINS made a purchase at a luxury retail store for approximately \$5,300; a purchase at an optical store for approximately \$294.68; and a purchase at another luxury retail store for approximately \$842.70.
- f. On or about July 23, 2020, LARKINS transferred approximately \$3,888 at a luxury hotel.
- g. In or around August 2020, LARKINS withdrew approximately \$14,680 in cash through a series of transactions.
- h. From in or around June 2020 through in around August 2020, LARKINS spent approximately \$2,193 on various items.

### ***Falsified MVP Advisors EIDL Application to the SBA***

38. On or about June 21, 2020, LARKINS submitted an EIDL application to the SBA in the name of MVP Advisors seeking an EIDL Loan in the amount of approximately \$149,900 and an EIDL advance payment of approximately \$10,000. The application was submitted in the name of Individual-3, which consists of LARKINS's father's first name and his mother's maiden name. In addition, the social security number was not associated with his name or any other name. The EIDL application identified Individual-3 as the owner of MVP Advisors. The Internet Protocol ("IP") address through which the application was submitted was the same IP address used to submit applications for Capital and Silver Star, which LARKINS purports to own.

39. LARKINS claimed that MVP Advisors had 25 employees; that the business's annual gross revenue for the prior 12-months prior to the disaster date, *i.e.*, January 31, 2019 through January 31, 2020, was approximately \$860,000; and that its cost of goods sold was approximately \$35,000. SSA records, however, revealed that MVP Advisors did not report any wages paid to employees for the period between 2018 and 2020. Nor did the IRS receive any Transmittal of Wage and Tax Statements (IRS Forms W-3); Wage and Tax Statements (Forms W-2); Corporate Income Tax Returns (Forms 1120); or Employer's Annual Federal Unemployment Tax Return (Forms 940) between 2018 and 2020. IRS records also show that MVP Advisors did not file any Employer's Quarterly Federal Tax Returns (Forms 941) for the tax quarters of 2018 through 2020.

40. In addition, bank records also revealed that, on or about June 18, 2020, MVP Advisors Account 1 had total deposits of approximately \$300, excluding the approximate \$149,900 and \$10,000 received in EIDL funds. This amount of deposited funds in the MVP Advisor's Account 1 was significantly lower than the approximately \$860,000 of gross revenue that LARKINS claimed for the company on



its EIDL application. Bank records also reflect that this account was opened on of June 18, 2020.

41. The MVP Advisors Account 1 and another MVP Advisors bank account (“MVP Advisors Account 2”) were opened at Bank 1 in the name of MVP Advisors, but with LARKINS listed as the owner along with his personal identifiers. LARKINS also submitted a certificate of formation and a certificate of reinstatement, both of which list LARKINS as the owner/officer of MVP Advisors for the business’s two bank accounts. LARKINS also comingled funds from Silver Star and Capital, two other companies that he owned, and controlled the bank accounts.

42. Bank records show that on or about June 23, 2020, LARKINS received the full loan amount of approximately \$149,900 into the MVP Advisors Account 1 at Bank 1. Bank records show that on or about July 1, 2020, LARKINS received the full advance amount of approximately \$10,000 into MVP Advisors Account 1 at Bank 1.

43. LARKINS then transferred the loan proceeds and made payments from MVP Advisors Account 1 at Bank 1 as follows:

- a. On June 25, 2020, LARKINS withdrew approximately \$10,000 in cash.
- b. On June 29, 2020 LAKRINS transferred approximately \$51,000 to a Silver Star account in Bank 1.
- c. On July 9, 2020, LARKINS received the PPP loan into this MVP advisors Account 1 for approximately \$284,850.
- d. On July 16, 2020, LARKINS withdrew approximately \$50,000 in cash.
- e. On July 21, 2020 LARKINS transferred a total of \$70,000 from Capital and Silver Star, each of which are companies LARKINS purports to own.
- f. From July 22, 2020 to July 29, 2020, LARKINS withdrew a total of approximately \$67,600 in cash through several transactions.
- g. From August 3, 2020 to August 6, 2020, LARKINS withdrew a total of approximately \$16,000 in cash through several transactions.
- h. On August 24, 2020, LARKINS made a purchase from a luxury retail store for approximately \$4,765.
- i. In September 2020, LARKINS withdrew a total of approximately \$16,700 in cash through a series of transactions.

j. On October 5, 2020, LARKINS withdrew approximately \$1,050 in cash.

44. By in or about October 2020, the MVP Advisors Account 1 at Bank 1 had a balance of approximately \$374.53.

### ***Falsified Capital EIDL Application to the SBA***

45. On or about June 24, 2020, LARKINS submitted an EIDL application to the SBA in the name of Capital seeking an EIDL in the amount of approximately \$149,900 and an EIDL advance of approximately \$10,000. The application was submitted in LARKINS's name as the owner of Capital with his social security number and date of birth.

46. LARKINS claimed that Capital had 30 employees; that the business's annual gross revenue for the prior 12-months prior to the disaster date, *i.e.*, January 31, 2019 through January 31, 2020, was approximately \$956,000; and that its cost of goods sold was approximately \$125,000. SSA records, however, revealed that Capital did not report any wages paid to employees for the period between 2018 and 2020. Nor did the IRS receive any Transmittal of Wage and Tax Statements (IRS Forms W-3); Wage and Tax Statements (Forms W-2); Corporate Income Tax Returns (Forms 1120); or Employer's Annual Federal Unemployment Tax Return (Forms 940) between 2018 and 2020. IRS records also show that Capital did not file any Employer's Quarterly Federal Tax Returns (Forms 941) for the tax quarters of 2018 through 2020.

47. In addition, bank records revealed that on or about June 18, 2020, Capital opened its bank account at Bank 1 with a starting balance of approximately \$300, excluding the approximate \$149,900 and \$10,000 loan proceeds later received. This amount of deposited funds in Capital's bank account was significantly lower than the approximate \$956,000 of gross revenue that LARKINS claimed for the company on its EIDL application.

48. In addition, as part of the application, LARKINS provided falsified a February 2020 bank account statement for Capital which showed a balance of approximately \$561,712. Bank records, however, revealed that this account was not opened until June 18, 2020 with a starting balance of approximately \$300.

49. Bank records also show that on or about June 25, 2020, LARKINS received the full loan amount of approximately \$149,900 into the Capital account at Bank 1. On July 6, 2020, LARKINS received approximately \$10,000 in an EIDL advance as a part of the loan.

50. LARKINS then transferred the loan proceeds from the Capital bank account at Bank 1 as follows:

- a. On or about June 29, 2020, and on or about June 30, 2020, LARKINS withdrew a total of approximately \$20,000 in cash.
- b. On or about July 6, 2020, and on or about July 7, 2020, LARKINS made two purchases at luxury retail stores for a total of approximately \$13,925.97.
- c. From on or around July 9, 2020 through on or about July 17, 2020, LARKINS withdrew approximately \$19,600 in cash through several transactions.
- d. On or about July 17, 2020, LARKINS made a purchase at an optical store for approximately \$4,400.
- e. On or about July 21, 2020, LARKINS transferred approximately \$35,000 from the Capital bank account at Bank 1 to MVP Advisors Account 1 at Bank1.
- f. From on or about July 22, 2020, through on or about August 5, 2020, LARKINS withdrew a total of approximately \$24,000 in cash through several transactions.
- g. From on or about August 6, 2020, through on or about August 26, 2020, LARKINS made a series of miscellaneous charges for a total of approximately \$6,358.
- h. From on or about August 20, 2020, August 21, 2020, and August 27, 2020, LARKINS made purchases at a department retail store for a total of approximately \$2,630.
- i. On or about September 2, 2020, LARKINS made five withdrawals for a total of approximately \$4,000 in cash.
- j. From on or about September 9, 2020, through on or about September 15, 2020, LARKINS withdrew approximately \$29,000 in cash through a series of transactions.

***Falsified MVP Advisors PPP Application to Lender 2***

51. On or about June 29, 2020, LARKINS submitted a PPP application to Lender 2 in the name of MVP Advisors seeking a PPP Loan in the amount of approximately \$284,850. The application was submitted in the name of Individual-3. The PPP application identified Individual-3 as the owner of MVP Advisors. Individual-3's name is a combination of LARKINS father's first name and his

mother's maiden name. The IP address through which the application was submitted, was the same IP address used to submit applications for Capital and Silver Star, which LARKINS purports to own.

52. LARKINS claimed MVP Advisors had 53 employees and that the business's average annual payroll was approximately \$113,940. In addition, as part of the application, LARKINS submitted purported Employer's Quarterly Federal Tax Returns (Forms 941) for each quarter of 2019. SSA records, however, revealed that MVP Advisors did not report any wages paid to employees for the period between 2018 and 2020. Nor did the IRS receive any Transmittal of Wage and Tax Statements (IRS Forms W-3); Wage and Tax Statements (Forms W-2); Corporate Income Tax Returns (Forms 1120); or Employer's Annual Federal Unemployment Tax Return (Forms 940) between 2018 and 2020. IRS records also show that MVP Advisors did not file any Employer's Quarterly Federal Tax Returns (Forms 941) for the tax quarters of 2018 through 2020.

53. In addition, bank records revealed that MVP Advisors opened its bank account on or about June 18, 2020 with a starting balance of approximately \$300 excluding the approximate \$149,900 and \$10,000 in EIDL funds received. In connection with the application, LARKINS submitted a falsified February 2020 bank account statement for this account that listed the company's balance as approximately \$478,712.

54. LARKINS submitted the application using the name of Individual-3 as the owner of MVP Advisors. He provided a driver's license with the name of Individual-3 along with social security number. SSA records reveal, however, that the social security number listed for Individual-3 was not a valid social security number and was not associated with any individual. The bank account was opened in the name of MVP Advisors, but with LARKINS's name and personal identifiers listed as the owner. LARKINS also submitted a certificate of formation and a certificate of reinstatement, both of which list LARKINS as the owner/officer of MVP Advisors for the two MVP Advisor bank accounts. LARKINS also comingled funds from other companies that he controlled—Silver Star and Capital—through this Bank account.

55. Bank records show that on or about July 9, 2020, LARKINS received the full loan amount of approximately \$284,850 into the MVP Advisors Account 1 at Bank 1.

56. LARKINS then transferred the loan proceeds and made payments from the MVP Advisors Account 1 at Bank 1 as follows:

- a. On July 16, 2020, LARKINS withdrew approximately \$50,000 in cash
- b. On July 21, 2020 LARKINS transferred funds from Capital and Silver

- Star, each of which are companies LARKINS purports to own, each for approximately \$35,000, for a total of approximately \$70,000.
- c. From July 22, 2020 to July 29, 2020, LARKINS withdrew a total of approximately \$67,600 in cash through several transactions.
  - d. From August 3, 2020 to August 6, 2020, LARKINS withdrew a total of approximately \$16,000 in cash through several transactions.
  - e. On August 24, 2020, LARKINS made a purchase from a luxury retail store for approximately \$4,765.
  - f. In September 2020, LARKINS withdrew a total of approximately \$16,700 in cash through a series of transactions.
  - g. On October 5, 2020, LARKINS withdrew approximately \$1,050 in cash.
  - h. By October 2020, the account had an ending balance by October 2020, of approximately \$374.53.

### ***Misuse of the PPP and EIDL Loan Proceeds***

57. In total, LARKINS transferred at least approximately \$1.1 million in fraudulent obtained PPP and EIDL funds from the companies' bank accounts. Specifically, LARKINS withdrew approximately \$526,918 in cash; made approximately \$444,307 in purchases via third-parties, including \$388,157 at one company; and transferred approximately \$253,000 to a bank in Ghana.