

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Joseph Miller

Case No. Case: 2:24-mj-30176
Assigned To : Unassigned
Assign. Date : 5/6/2024
USA V. SEALED MATTER (CMP)(CMC)

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 September 2019 through February 2023 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 1343 (Wire fraud), 18 U.S.C. § 1344 (Bank fraud), 18 U.S.C. § 1349 (Conspiracy to commit wire fraud and bank fraud), and 18 U.S.C. § 1028A (Aggravated identity theft).

This criminal complaint is based on these facts:
see attached affidavit.

[X] Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 6, 2024

City and state: Detroit, Michigan

Handwritten signature of Carlo P. Pizzorni over a horizontal line.

Complainant's signature

Carlo P. Pizzorni, Task Force officer (USSS)

Printed name and title

Handwritten signature of Kimberly G. Altman over a horizontal line.

Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

I, Carlo Pizzorni, being duly sworn, depose and state as follows:

1. I am a Police Officer with the City of Troy Police Department and have been since May of 2015. I am currently assigned to the United States Secret Service (USSS) as a Task Force Officer (TFO) with the Southeast Michigan Cyber Fraud Task Force (Task Force) where I participate in investigations involving suspects committing violations of federal law including bank fraud, wire fraud, conspiracy, and identity theft.
2. The information set forth in this affidavit is based upon my training, knowledge, experience, and investigation. This affidavit does not contain every fact that I have learned during the investigation, but instead includes only those facts I believe establish the requisite probable cause in support of a criminal complaint against Joseph Miller for violations of 18 U.S.C. § 1343 (wire fraud), 18 U.S.C. 1344 (bank fraud), 18 U.S.C. § 1349 (conspiracy to commit wire fraud and bank fraud), and 18 U.S.C. § 1028A (aggravated identity theft).

FRAUD INVOLVING CONSTRUCTION SUPPLIES AND LOANS

3. Summarized below are the results of an investigation revealing that Joseph Miller used the personal identifying information (PII) of other individuals as

part of a scheme to purchase—and obtain loans to purchase—high-value construction and land-scaping supplies. The investigation has revealed that these supplies were then sold to local contractors at a significant discount.

PII Seized from Miller

4. On or about October 2022, your Affiant was informed that Joseph Miller, a known customer of an authorized dealer of ID cards and printer machines, had been making numerous purchases of large quantities of credit card stock with magnetic stripe capabilities and printer ribbon. This type of card stock and ribbon is known to your Affiant and experienced agents to be used by individuals to manufacture credit cards, debit cards, and different forms of identification cards that can be used to commit identity theft and fraud.
5. Your Affiant was advised by Special Agent Randal Cummings that Joseph Miller had been identified as a suspect in an identity theft and fraud investigation that dated back to 2019.
6. On or about October 26, 2022, your Affiant conducted surveillance at 5010 Oakman Boulevard, Detroit, Michigan, which was the location to which Joseph Miller was registering his vehicles with the state of Michigan. Affiant observed a U-Haul box truck parked in front of the home. The license plate on the truck was observed to be Arizona license plate ADZ56954. Your Affiant obtained the rental contract from U-Haul which

contained the customer name SL and a photograph of a Michigan driver's license. The driver's license was in the name of SL with a photo of Miller. Your Affiant contacted the true SL who advised that he was the victim of identity theft/fraud and that he had filed a police report with Wixom Police Department.

7. On or about November 22, 2022, members of the Task Force executed a state search warrant at the known Oakman Boulevard residence of Joseph Miller. Your Affiant and agents recovered electronics, cellphones, handwritten notebooks, printers, card stock, and additional items indicative of identity theft, wire fraud, and bank fraud.
8. West Bloomfield Police Department Detective Erik Hamilton executed digital forensic examinations on the cell phones and computer that were seized during the search at 5010 Oakman Boulevard and forensic reports were generated for each device.
9. A Homeland Security Forensic Laboratory executed a Thermal Ribbon Analysis Platform (TRAP) on printer ribbon seized from the Fargo printer seized at Miller's residence, 5010 Oakman Boulevard. The TRAP results contained images of driver's licenses and identification cards bearing the names WH, and 9 other people.

10. Your Affiant reviewed the forensic download of Miller's cell phone and discovered numerous photos of identification cards, including ones with Miller and WH on them, and social security cards in various names and states. In addition to the photographs, your Affiant found text messages between Miller and multiple individuals, including WH. The messages indicated that Miller was taking orders for items sold at Home Depot to sell to them for profit.
11. SA Cummings reviewed the forensic examination of the computer and extracted approximately 200 images of fraudulent driver licenses and identification cards. Many of the cards had the same photograph of WH or Joseph Miller on them with different names and PII of individuals. Card images included the names of WH, and 71 other names.
12. Your Affiant and members of the Task Force conducted a review of the documents and handwritten notebooks that were seized from the residence of Miller. A review of the notebooks discovered PII for approximately 350 - 400 individuals, including notes for loan applications, bank accounts, and credit card account information.

Fraudulent Purchases from Home Depot and the Tractor Supply Company

13. Your Affiant was provided with information that, in September 2019, incident reports were filed with the Novi Police Department and the

Bloomfield Hills Police Department for identity theft by victims ZL and JK, respectively. Both incidents involved fraudulent Home Depot credit accounts opened in their names and used to make purchases at Home Depot stores in Michigan. Investigative efforts identified AH as the suspect of both investigations.

14. On or about September 25, 2019, AH and Joseph Miller were arrested by the Utica Police Department at Home Depot for identity theft and credit card fraud. Upon arrest, officers seized notebooks, a printer, cellphones, blank card stock, and Home Depot customer invoices and pickup receipts. The officers also seized fraudulent Ohio driver licenses and an Arizona driver license bearing the name Joseph Miller from Miller. All Ohio and Arizona driver licenses seized had a photo of Miller. Officers also found on the person of Miller a Texas driver license bearing the name JL with a photo of AH and three credit cards.
15. During an interview, after waiving his rights per Miranda, Miller admitted to police the following: Miller and AH were working together to get merchandise from Home Depot using fraudulent credit accounts. Miller printed the identification cards himself, as he possessed the equipment to do so. On the date of the arrest, Miller went to Home Depot to pick up an order under the name JL. Miller provided AH with the fraudulent driver license

with JL's name and AH's photo. Miller gets 60% and AH gets 40% of the profit made from the sale of the fraudulently obtained merchandise to local contractors. Miller has had AH pick up fraudulent orders in the past with fake identification.

16. On or about October 2019, Utica police contacted the Task Force about the incident and turned over the items seized upon Miller's arrest. SA Cummings reviewed a notebook seized at the time of arrest and found that the notebook contained handwritten PII, including the names, addresses, social security numbers, date of births, and phone numbers of approximately 77 people. The list of approximately 77 people was sent to Citibank (CITI) Security and Investigative Services who handle the credit card accounts for Home Depot. CITI stated that of the 77 names, 22 people were victimized with a total fraud loss of \$174,252.
17. Your Affiant received and reviewed police reports from Livingston County Sheriff's Office, Wixom Police Department, and Troy Police Department which listed MH, SL, JM, and DK as victims of identity theft. In each case, unauthorized accounts were opened and purchases were completed in Michigan and Ohio at Home Depot, Tractor Supply Company, or both. In those cases, images of driver's licenses were obtained for purchases and

rental vehicles. The images on the driver's licenses were identified as Joseph Miller and WH. The total fraud loss in those cases was \$139,719.49.

18. The list of PII for the approximately 350 - 400 individuals found during the review of notebooks seized from Miller's Oakman Boulevard residence was sent to Citibank (CITI), which handles the credit card accounts for Home Depot. CITI is headquartered in New York and is insured by the Federal Deposit Insurance Corporation. CITI stated that of the approximately 350 - 400 names submitted for review a total of 48 individuals were victims of fraud. CITI advised that their purchase transactions are processed on servers located in Arizona and Nebraska.
19. The total amount of fraud loss caused by Miller and WH through Home Depot and Tractor Supply Company was found to be approximately \$912,000.

Fraudulent Loans Obtained from Sheffield Financial

20. Information developed during the course of the investigation found that Miller was involved in a scheme to obtain fraudulent loans from Sheffield Financial through the submission of stolen PII. Sheffield Financial (Sheffield) is located in North Carolina. Sheffield Financial is a division of Truist Bank and is insured by the Federal Deposit Insurance Corporation.

Sheffield provides financing for outdoor power equipment, powersports equipment, and trailers.

21. On or about September 3, 2021, the Traverse City Police Department received a complaint from JT who advised that he was a victim of identity theft. JT stated that two loans were taken out in his name through Sheffield Financial for the purchases of lawnmowers in Burton, Michigan, and Barberton, Ohio, totaling \$40,246.82.
22. Traverse City police contacted G.S.A. Equipment (GSA) in Barberton, Ohio. A representative of GSA stated that an individual purchased two mowers totaling \$19,533.12. The GSA invoice listed JT on Pallister Street in Detroit, Michigan, and a phone number 313-854-6574.
23. Sheffield Financial, where the loans were acquired from, contacted Traverse City police and stated that the second loan was used to purchase equipment at Atherton Road Sales in Burton, Michigan. The vehicle that picked up the equipment was a Dodge Ram truck bearing license plate DC89852. Traverse City police contacted AVIS Rental Company who stated that Joseph Miller, DOB: 12/23/19XX, with an address of 1709 Firestone Drive, Findley, Ohio, Phone: XXX-XXX-7714, rented the truck from 8/7/21 – 9/7/21. Law Enforcement databases matched the phone number provided to Joseph Miller. The identification used to pick up the equipment at Atherton Road

Sales was an Ohio driver license issued in the victim's name with a photo of Miller. The address on the license was the same address in Findley, Ohio, used to rent the truck.

24. Your Affiant reviewed a Belleville, Michigan, Police Department report filed by TK on June 14, 2022, who advised that he was a victim of identity theft. TK received a letter in the mail that included a financing statement filing and a welcome letter from Sheffield Financial. The letter stated that he had opened an account and financed \$15,138.57. The purchase was determined to have been made at Atherton Road Sales and Services, located at 6468 E Atherton Rd. G, in Burton, Michigan. Representatives of Atherton Road Sales stated that the suspects were seen driving a white Toyota Tundra with Ohio license plate PMK7808. A copy of the ID presented to JM by the suspect matched to AM.
25. Detectives later interviewed AM in the Monroe County Detention Center. AM identified Joseph Miller as the individual who provided him with fraudulent driver's licenses and took him to commit fraud.
26. As previously mentioned, on or about March 1, 2023, your Affiant received information from the Troy Police Department that DK filed a report stating that he was the victim of identity theft. DK stated that in February 2023, he discovered that a line of credit with Sheffield Financial was opened in his

name at Grafton Mowers in Grafton, Ohio and used to purchase \$30,596.00 worth of landscaping equipment. DK spoke with the store and was informed that they made a copy of the driver's license used to open the line of credit and sent the copy to DK. The license used for the purchase at Grafton Mowers was reviewed by your Affiant and the photo was found to be Joseph Miller.

27. The list of PII for individuals found during the review of Miller's notebooks was sent to Sheffield for records and documents of loans funded to current or past accounts. Loan documents provided by Sheffield to your affiant disclosed six fraudulent accounts where loans were funded, and equipment was purchased. JT, TK, and DK, were all found to have fraudulent accounts opened with their PII.
28. The total amount of loans received by Miller through Sheffield Financial was found to be approximately \$172,000.

FRAUD INVOLVING PANDEMIC RELIEF LOANS

29. In addition to the fraud described above, investigation has revealed that Miller fraudulently applied for and received loans from programs initiated to support small businesses during the COVID-19 pandemic.

30. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act provided two sources of funding for small businesses affected by the economic downturn associated with the Coronavirus pandemic:
- a. Paycheck Protection Program (PPP) which was designed for payroll costs and benefits, mortgage interest and rent, and utilities.
 - b. Economic Injury Disaster Loans (EIDL) which was designed for working capital (fixed debts, payroll, accounts payable).

The Paycheck Protection Program

31. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act is a federal law enacted in or around 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.
32. 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 to be eligible to obtain the PPP loan. In the PPP loan application, the small business (through its authorized representative) 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.

33. 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 Small Business Administration (“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 while processing the loan.
34. 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 (usually within twenty-four weeks of receiving the

proceeds) and uses at least 60% of the PPP loan proceeds for payroll expenses.

Economic Injury Disaster Loans

35. Another component of the CARES Act is SBA Economic Injury Disaster Loans (EIDL). The SBA provides that in response to COVID-19, EIDLs will provide economic relief to small businesses and non-profit organizations that were experiencing a temporary loss of revenue. EIDL proceeds can be used to cover a wide array of working capital and normal operating expenses, such as continuation to health care benefits, rent, utilities, and fixed debt payments.

Miller's Fraudulent Covid-19 PPP and EIDL Loans

36. Investigative efforts, law enforcement databases, and open-source data found applications were submitted to the SBA and financial institutions for Covid-19 PPP and EIDL Loans with the Personal Identifiable Information (PII) found in notebooks seized during the execution of a search warrant at the residence of Joseph Miller in Detroit, Michigan. The PII found in the notebooks was used to obtain seven PPP and EIDL loans totaling approximately \$457,000, which are described in the table below.

37.

Business Name	Loan Type	Financial Institution	Payment Date	Amount
AA Dry Cleaning	EIDL	SBA - Treasury	8/10/2020	\$74,400
Dibella's Subs	EIDL	SBA - Treasury	8/10/2020	\$49,700
Dental Studio	EIDL	SBA - Treasury	7/22/2020	\$29,600
Salon 429	EIDL	SBA - Treasury	7/31/2020	\$29,700
Good Care Network	PPP	Cross River Bank	2/10/2021	\$116,001
Good Care Network	PPP	Lendistry	5/21/2021	\$136,835
ZK	PPP	Customers Bank	5/14/2021	\$20,570

38. Because these loans are linked to Miller through the PII found in notebooks at his home, Affiant believes that all were fraudulently obtained by Miller. Additional details concerning three of the loans are described below.

\$20,570 ZK PPP Loan Fraud

39. A review of documents and notes seized during the execution of a search warrant at the residence of Joseph Miller identified the name ZK and associated PII including an email address, PNC Bank account number ending in 81297, and a Smartbiz application number 6336751.
40. Smartbiz is a financing platform that provides a service for small businesses to apply for and secure low-cost funds from banks, to include access to SBA loans. Smartbiz is located in San Francisco, California.
41. Smartbiz provided SA Cummings with the application and supporting documentation for loan 6336751 with the listed borrower as a business called ZK.

42. A review of loan 6336751 indicated that ZK has one (1) employee, provided home healthcare services, was established in 2017, and is located in Southfield, Michigan.
43. A review of the Paycheck Protection Eligibility Questions form provided by Smartbiz, created on April 14, 2021, indicated the funds were necessary for employee salaries and/or self-income, rent or interest on mortgage, utilities, operations expenditures, worker protection expenditures, and supplier costs.
44. The SBA Promissory Note and PPP Borrower Application Form provided by Smartbiz for loan 6336751 in the amount of \$20,570 was purportedly DocuSigned by ZK on April 20, 2021.
45. Smartbiz secured the PPP loan on behalf of ZK from Customers Bank located in Phoenixville, Pennsylvania. Customers Bank is insured by the Federal Deposit Insurance Corporation.
46. Customers Bank provided SA Cummings with loan documents for ZK in Southfield, Michigan, which disclosed that Customers Bank funded PPP loan number ending 78801 in the amount of \$20,570 on or about May 14, 2021. The funds were deposited into PNC Bank account ending in 81297.
47. Documents provided by PNC Bank indicated that Virtual Wallet Spend Account ending 81297 was opened on April 4, 2021, and titled to ZK in Southfield, Michigan. PNC Bank Virtual Wallet Spend Statement disclosed

a deposit of \$20,570 on May 17, 2021, with a description of Corporate ACH Cubi PPP Customers Bank.

48. A review of PNC Bank Virtual Wallet Spend Statements for account ending 81297 disclosed cash withdrawals of \$5,500 on May 17, 2021, and \$4,500 on May 19, 2021. Withdrawals and Purchases from May 25, 2021, to June 23, 2021, included four (4) banking machine withdrawals (ATM) totaling \$2,607.98; debit card purchases totaling approximately \$701 at Spa & Nails, Cobo Cleaners, Rays Party Store, and various restaurants; and point-of-sale purchases and ATM fees totaling \$73. The review also disclosed that on July 20, 2021, a cash withdrawal was made in the amount of \$6,500.
49. The total amount of Withdrawals and Purchases from account ending 81297 from May 17, 2021, through July 20, 2021, totaled approximately \$19,879.
50. During the same period, a review of the source of revenue into account ending 81297 found two deposits totaling \$86, ATM Transaction fee Reimbursements, Non-PNC ATM Surcharge Reimbursements, and a \$1,182 Debit Card Credit from Priceln Z Ocean Hotel. The total amount of revenue into the account during this period was approximately \$1,300.
51. Affiant's review of the Withdrawals and Purchases from PNC Account Statements, referenced above, found that the funds of this loan did not appear to be used for employee salaries and/or self-income, rent or interest

on mortgage, utilities, operations expenditures, worker protection expenditures, and supplier costs, as stated by the borrower on the Paycheck Protection Eligibility Questions form.

52. On January 25, 2024, SA Cummings interviewed ZK in Pontiac, Michigan, regarding SBA PPP Loan number ending 78801 issued to ZK in Southfield, Michigan, in the amount of \$20,570. ZK never used the email address or contact number associated with the loan in question, has never heard of Customers Bank, nor did ZK have a PNC Bank Virtual Wallet account. ZK never authorized anyone to apply for, docusign, or obtain an SBA PPP loan on behalf of ZK.

\$29,700 Studio 429 SBA EIDL Loan Fraud

53. A review of documents and notes seized during the execution of a search warrant at the residence of Joe Miller identified the name JG and associated information including email addresses, phone numbers, a Go Bank account number ending in 89702, and the business Salon 429 with an address 429 Walnut Blvd., Rochester, Michigan 48307.
54. Affiant submitted an official request to the SBA Processing and Disbursement Center for all documentation related to the named individual(s) and/or business entities for SBA loans made available through the CARES Act.

55. SBA provided documents in support of SBA Loan number ending 18104 for Salon 429. A review of the SBA Rapid Intake Form indicated that Salon 429 was established in 2014, had a gross revenue for the 12-months prior to the date of disaster (January 31, 2020) of \$121,821, its primary business address was 429 Walnut Blvd, Rochester, Michigan; a business phone of 248-601-4428, an alternative business phone of 313-737-7353, and had 11 employees. The owner of the business was JG, Email: gordon031971@gmail.com, and residential address 323 Fourth St, Rochester, Michigan. Studio 429 requested the funds be sent to Go Bank account number ending 89702.
56. Go Bank is an online bank that offers cash and direct deposits, photo check deposits, an ATM network, and more. Go Bank, is a brand of Green Dot Bank, which is insured by the Federal Deposit Insurance Corporation. It is headquartered in California.
57. SBA Loan Authorization and Agreement, with an effective date of July 25, 2020, indicated that a loan to Salon 429 located at 429 Walnut Blvd., Rochester Michigan, in the amount of \$29,700 was approved. The document was purportedly DocuSigned by JG the same day.

58. SBA Payment Details indicated that payment was funded successfully in the amount of \$29,700 on July 31, 2020. SBA's server, which requests the disbursement from the U.S. Treasury is in Sterling, Virginia.
59. SBA Notes/Comments data disclosed that on December 8, 2020, the SBA received an email from Salon 429 stating that there was an EIDL loan in its business name that it did not apply for.
60. Your Affiant contacted Salon 429 who stated that the person who applied for this loan known as JG is not affiliated with Salon 429 and that Salon 429 did not apply for nor receive funds in the amount of \$29,700 related to this SBA loan. Salon 429 provided your Affiant with an SBA Office of Inspector General Complaint Submission Form.
61. Handwritten notes of PII for JG found in the notebooks seized from the residence of Joseph Miller included the same date of birth, social security number, residential address, phone numbers, and email addresses listed on the SBA provided Rapid Intake Form.
62. On January 22, 2024, SA Cummings contacted JG via telephone regarding SBA EIDL Loan number ending 18104 issued to Salon 429 in Rochester, Michigan, in the amount of \$29,700. JG never lived in Michigan, had never heard of a business called Salon 429, never used the email addresses or contact numbers associated with the loan in question, and has never used Go

Bank. JG never authorized anyone to apply for, docusign, or obtain an SBA EIDL loan on behalf of Salon 429.

\$136,835 Good Care Network SBA PPP Loan Fraud

63. Open-source data disclosed that Good Care Network in Bullhead City, Arizona, received a PPP Loan in the amount of \$136,835 funded by Lendistry in May 2021.
64. A review of documents and notes seized during the execution of a search warrant at the residence of Joseph Miller identified the name Good Care Network, a purportedly associated address of 3570 Gloria Avenue, Bullhead City, Arizona, SBA Loan number 6190848406, and Smartbiz application number 6639545.
65. The State of Arizona, Office of the Corporation Commission provided Affiant with Articles of Organization for Good Care Network. Good Care Network was originally incorporated on October 19, 2015, and listed DG as the Statutory Agent with a street address of 3570 Gloria Avenue, Bullhead City, Arizona, and mailing address of 8706 E Oak St, Mesa, Arizona. Good Care Network was issued Arizona Corporations Commission file number: L20411336.
66. Law Enforcement Database search and open-source data indicated that both Miller and DG were associated with addresses located at 3880 Stone Haven

Dr., Troy, Michigan; 2215 Ventura Drive, Bullhead City, Arizona; and 8706 E Oak St., Mesa, Arizona

67. Smartbiz is a financing platform that provides a service for small businesses to apply for and secure low-cost funds from banks, to include access to SBA loans. Smartbiz is located in San Francisco, California.
68. Smartbiz provided SA Cummings with the application and supporting documentation for loan application 6639545 with the listed borrower as Good Care Network.
69. A review of Smartbiz loan application 6639545 indicated that Good Care Network had sixteen employees, operated residential mental health and substance abuse facilities, and was established in 2015. Good Care Network was owned by DG and located in Bullhead, Arizona. DG provided a home address of 3880 Stone Haven Drive, Troy, Michigan.
70. Smartbiz Eligibility Questions document for Good Care Network created on April 28, 2021, indicated that the funds from this loan would be used for employee salaries and/or self-income, rent or interest on mortgage, utilities, worker protection expenditures, and supplier costs. Good Care Network also indicated that four (4) additional jobs would be created because of this loan.

71. SA Cummings obtained loan documents from Lendistry, the financial institution that funded SBA Loan Number ending 9001 with a beneficiary of Good Care Network. Lendistry is located in California and provides access to small business loans, to include SBA loans.
72. A review of documents provided by Lendistry indicated that the loan issued to Good Care Network was approved on or about May 21, 2021, in the amount of \$136,835. The SBA promissory note for Good Care Network was DocuSigned by DG on May 30, 2021.
73. A review of the PPP Second Draw Borrower Application Form DocuSigned by DG on May 30, 2021, provided by Lendistry indicated that in 2019 Good Care Network had a total gross income of \$1,369,979; it had 16 employees, and an average monthly salary of \$46,401. The application also indicated that a PPP First Draw SBA Loan was obtained in the amount of \$116,001 in February 2021 under SBA Loan Number 6190848406. A review of notebooks seized during the execution of a search warrant at the residence of Miller found handwritten notes for Good Care Network with Loan Number 6190848406.
74. Supporting documentation provided by Lendistry, included a copy of Michigan Department of Licensing and Regulatory Affairs (LARA) Articles of Incorporation filing for the limited liability company DLuxe Hookah

LLC. The registered agent was DG with a registered mailing address of 3880 Stone Haven Drive, Troy, Michigan 48084. Also provided was a Bank of America statement for checking account ending 4112 for February 9, 2020, to March 11, 2020, titled to Good Care Network LLC, 3880 Stonehaven Dr, Troy, Michigan.

75. A forensic examination of Miller's HP Pavilion Computer contained the same image of the LARA Articles of Incorporation filing for DLuxe Hookah LLC.
76. A request was submitted to Bank of America by SA Cummings for information pertaining to account ending 4112 for Good Care Network LLC. Bank of America could not locate any account(s) or record(s) based on the information provided. On or about July 13, 2023, SA Cummings contacted the number provided for Bank of America and spoke with BT at Legal Order Processing. BT confirmed that Bank of America did not have, nor do they have, a record(s) of account ending 4112 for Good Care Network LLC, 3880 Stonehaven Dr, Troy, Michigan 48084.
77. The approved funds from SBA Loan Number ending 9001 were deposited on or about June 3, 2021, into TCF Bank checking account ending 3124 titled to Good Care Network LLC, 3880 Stone Haven Dr, Troy, Michigan. DG was the signatory on the account.

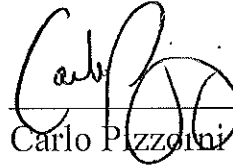
78. SA Cummings obtained documents from TCF Bank for account ending 3124 in the name of Good Care Network LLC, 3880 Stone Haven Dr, Troy, Michigan 48084. TCF Statement for account ending 3124 for May 31, 2021, to June 30, 2021, disclosed an ACH Credit of \$136,835 on June 3, 2021, with a description PPP SmartBiz 8777050708.
79. A review of disbursements from June 3, 2021, through June 30, 2021, disclosed a total of approximately \$118,937 in withdrawals. During this period there were approximately \$5,240 in ATM withdrawals, approximately \$36,715 in Check Card debits, approximately \$6,777 in Point-of-Sale debits, and approximately \$70,205 in checking withdrawals. A \$35,000 checking withdrawal with the note "To Joseph Miller – Payroll" was made on June 7, 2021. Additional examples of withdrawals during the month of June 2021 included \$1,500 for Road Runner Auto Sales; \$1,073.78 for Vernor Express Liquor Detroit, MI; \$4,217 in payments to Capital One Card on June 11, 2021; \$105 for Happy Feet Nails Spa; \$2,145.03 for Vernor Express Liquor Detroit, MI; and \$1,359.06 for Priceln Z Ocean Hotel.

CONCLUSION

80. Based on the above information, your Affiant has probable cause to believe that Joseph Miller, within the Eastern District of Michigan, conspired to knowingly commit bank and wire fraud in violation of 18 U.S.C. section 1343, 1344, and 1349. Your Affiant believes that probable cause exists to establish that Joseph Miller committed aggravated identity theft by using, without lawful authority, a means of identification of another person during and in relation to the crimes of bank and wire fraud, in violation of 18 U.S.C. § 1028A.

81. In Addition, your Affiant has probable cause to believe that Joseph Miller, within the Eastern District of Michigan, committed Bank Fraud by knowingly executing, or attempting to execute, a scheme or artifice to obtain moneys, funds, credits, assets, or other property owned by, or under the custody of a financial institution in violation of Title 18 U.S.C. § 1344.

Respectfully submitted,



Carlo Pizzoni
Task Force Officer
USSS

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: May 6, 2024