

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America
v.
KIPTERREZ JAMES
(a/k/a Kipp James, a/k/a Kip James)
Case No. 1:24-mj-284
Defendant(s)

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 4/6/2021 & 8/23/2021 in the county of Hamilton in the
Southern District of Ohio, the defendant(s) violated:

Code Section 18 U.S.C. 1001 Offense Description False Statements

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Jason Greer
Complainant's signature

Special Agent Jason Greer
Printed name and title

Sworn to before me and signed in my presence.
via FaceTime video

Date: Apr 18, 2024

City and state: Cincinnati, Ohio

Karen L. Litkovitz
United States Magistrate Judge



UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES

v.

KIPTERREZ JAMES

(a/k/a Kipp James, a/k/a Kip James)

Case No. 1:24-mj-284

Filed Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jason Greer, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (“SA”) with Homeland Security Investigations (“HSI”), Department of Homeland Security, Cincinnati – Assistant Special Agent in Charge Office. I have been employed as a Special Agent with the HSI since September 2010. I attended the 16-week Criminal Investigator Training Program (“CITP”) and the 8-week Immigration Customs Enforcement Special Agent Training (“ICESAT”) at the Federal Law Enforcement Training Center in Glynco, GA. During ICESAT training, I was trained in organized crime, fraud, money laundering, drug trafficking, customs violations, and immigration investigations. Additionally, I was previously employed as a Special Agent with the Drug Enforcement Administration (“DEA”). I attended the sixteen-week DEA training academy and worked in a DEA District Office in which I was trained and supervised in many aspects of investigations of illegal narcotic trafficking and money laundering. My present responsibilities include the investigation of violations of Titles 8, 18, 19, 21, and 26 of the United States Code and related offenses. I have conducted and participated in numerous investigations involving financial

crimes and have focused attention on the detection and apprehension of individuals violating both federal and state laws.

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

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1001 (False Statements) have been committed by KIPTERREZ JAMES (a/k/a Kipp James, a/k/a Kip James).

PROBABLE CAUSE

4. On December 1, 2009, KIPP JAMES was sentenced to 92 months in prison (consecutive to a state sentence) in Southern District of Ohio case 1:09-cr-005 for being a felon in possession of a firearm. As he completed his sentence, he spent three months at the Talbert House halfway house from January 28, 2021 to April 28, 2021.

5. On April 6, 2021, while he was at the Talbert House, JAMES applied online for a Paycheck Protection Program loan, which was a COVID-19 pandemic relief program administered by the Small Business Administration (“SBA”) that provided forgivable loans to small businesses for job retention and certain other expenses. On the loan application, JAMES claimed his business was called “Kip James.” He listed 485310 as the NAICS Code for his

business. This code refers to taxi and ridesharing services. He claimed his business was established in 2019. He claimed his business had \$99,489 in gross income in 2019, when he was actually incarcerated. He listed the business address as 2216 Vine Street, Cincinnati, Ohio 45219. This is the address of the Talbert House halfway house.

6. In support of the loan application, JAMES submitted a purported Green Dot bank statement for account number xxxxxxxxxx0912. However, in response to an inquiry during this investigation, Green Dot responded that it had no record of this account number. Thus, the purported bank statement appears to be a forgery.

7. In support of the loan application, JAMES uploaded a digital photo of his Ohio driver's license.

8. A search of Ohio's Secretary of State website reveals no records of a business with the name "KIP JAMES." (JAMES did register a business called C&J Environmental Services Inc. in 2023, but this was two years after he applied for the PPP loan.)

9. The PPP loan application was approved, and a loan of \$20,725 was deposited on April 17, 2021 into account xxx8060 at Kemba Credit Union. This account is held by JAMES. He then spent the PPP money on personal expenditures, including the following:

- Several thousand dollars in cash withdrawals
- Several thousand dollars in transfers to his own CashApp account
- \$439.00 at Vengeance (clothing store)
- \$177.87 at Vengeance (clothing store)
- \$480.79 at Exclusive513 (clothing store)
- \$216.00 at Wendel's (shoe store)

- \$118.14 at Red Lobster
- \$139.06 at J Alexanders (restaurant)
- \$183.26 at City Gear (shoe store)
- \$40.00 at Kings Island
- \$318.00 at Sole by Style (shoe store)
- \$594.13 at Snaptravel MGM Grand
- \$97.02 at JD (shoe store)
- \$216.65 at Holiday House Liquors
- Expenditures in Las Vegas, NV from 5/28/2021 to 5/31/2021, including:
 - \$272.67 at Maceoo Paris (clothing store)
 - \$292.61 at Jimmy Choo (clothing store)
 - \$227.59 at Jimmy Choo (clothing store)
 - \$218.43 at Drai's (nightclub)
 - \$468.85 at Alamo (car rental)
 - \$186.66 at MGM Grand.

10. JAMES applied for forgiveness of the PPP loan on August 23, 2021. On the forgiveness application, he again claimed that his business was named "Kip James," the business address was 2216 Vine Street in Cincinnati, and the business NAICS code was 485310 (taxi/ridesharing). He falsely claimed that he spent \$20,725 of the loan on payroll costs. He falsely certified that he had complied with all PPP rules, including rules related to eligible uses of PPP loan proceeds. The loan was forgiven.

CONCLUSION

11. Based on the forgoing, I request that the Court issue the proposed complaint and arrest warrant.

Respectfully submitted,

Jason Greer

Jason Greer
Special Agent
Department of Homeland Security

Subscribed and sworn to before me on April 18, 2024.

Karen L. Litkovitz

Karen L. Litkovitz
United States Magistrate Judge

