

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	Criminal No.	1:20-CR- 290	(GTS)
)			
v.)	Indictment		
)			
JEAN R. LAVANTURE, A/K/A)	Violations:	18 U.S.C. § 1344	
RUDY LAVANTURE,)		[Bank Fraud]	
)			
)	3 Counts and Forfeiture Allegation		
)			
Defendant.)	County of Offense:	Ulster	

THE GRAND JURY CHARGES:

COUNT 1
[Bank Fraud]

On or about June 24, 2020, in Ulster County in the Northern District of New York, and elsewhere, the defendant, **JEAN R. LAVANTURE, A/K/A RUDY LAVANTURE**, knowingly executed a scheme and artifice to defraud a financial institution, and obtained monies, funds and assets owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses and representations, in that the defendant knowingly submitted a false and fraudulent Paycheck Protection Program loan application to Bank of America, N.A., the deposits of which were then insured by the Federal Deposit Insurance Corporation, seeking a loan in the amount of \$124,800.00 for Dreamcast Entertainment LLC (“Dreamcast”), and made materially false statements, and submitted fraudulent and materially false tax documents, in which, among other things, **JEAN R. LAVANTURE, A/K/A RUDY LAVANTURE** misrepresented Dreamcast’s salaries and wages paid in 2019 and 2020, and the number of employees it had in 2020, in violation of Title 18, United States Code, Section 1344.

COUNT 2
[Bank Fraud]

On or about July 10, 2020, in Ulster County in the Northern District of New York, and elsewhere, the defendant, **JEAN R. LAVANTURE, A/K/A RUDY LAVANTURE**, knowingly executed a scheme and artifice to defraud a financial institution, and obtained monies, funds and assets owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses and representations, in that the defendant knowingly submitted a false and fraudulent Paycheck Protection Program loan application to Bank of America, N.A., the deposits of which were then insured by the Federal Deposit Insurance Corporation, seeking a loan in the amount of \$1,354,112.00 for Intrust Investment Realty LLC (“Intrust”), and made materially false statements, and submitted fraudulent and materially false tax documents, in which, among other things, **JEAN R. LAVANTURE, A/K/A RUDY LAVANTURE** misrepresented Intrust’s salaries and wages paid in 2019 and 2020, and the number of employees it had in 2020, in violation of Title 18, United States Code, Section 1344.

COUNT 3
[Bank Fraud]

On or about July 14, 2020, in Ulster County in the Northern District of New York, and elsewhere, the defendant, **JEAN R. LAVANTURE, A/K/A RUDY LAVANTURE**, knowingly executed a scheme and artifice to defraud a financial institution, and obtained monies, funds and assets owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses and representations, in that the defendant knowingly submitted a false and fraudulent Paycheck Protection Program loan application to Bank of America, N.A., the deposits of which were then insured by the Federal Deposit Insurance Corporation, seeking a loan in the amount of \$1,520,772.00 for Project Youth Exposure Inc. (“Project Youth Exposure”), and

made materially false statements, and submitted fraudulent and materially false tax documents, in which, among other things, **JEAN R. LAVANTURE, A/K/A RUDY LAVANTURE** misrepresented Project Youth Exposure's salaries and wages paid in 2019 and 2020, and the number of employees it had in 2019 and 2020, in violation of Title 18, United States Code, Section 1344.

Forfeiture Allegation

1. The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

2. Upon conviction of an offense charged in Counts One through Three of the Indictment, in violation of Title 18, United States Code, Section 1344, the defendant, **JEAN R. LAVANTURE, A/K/A RUDY LAVANTURE**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting, and derived from, proceeds the person obtained directly and indirectly, as the result of such violation. The property to be forfeited includes, but is not limited to, the following:

- a. The real property located at 85 & 87 Tamarack Road, Byram Township, New Jersey 07821;
- b. The real property located at 2927 State Highway 176, Rockaway Beach, MO 65740;
- c. All cash seized from **JEAN R. LAVANTURE, A/K/A RUDY LAVANTURE's** residence located at 85 & 87 Tamarack Road, Byram Township, New Jersey 07821, on September 17, 2020, totaling approximately \$614,479.70 in U.S. currency;

- d. A 2007 Bentley Continental GTC, Vehicle Identification Number SCBDR 33W77 C0480 48;
- e. JP Morgan Chase account corresponding to account number XXXXXX0368, standing in the name of J Business Ventures LLC;
- f. JP Morgan Chase account corresponding to account number XXXXXX2597, standing in the name of J Business Ventures LLC;
- g. JP Morgan Chase account corresponding to account number XXXXXX1282, standing in the name of Jean Lavanture;
- h. JP Morgan Chase account corresponding to account number XXXXXX8255, standing in the name of Jean Lavanture;
- i. JP Morgan Chase account corresponding to account number XXXXXX5513, standing in the name of ~~M&T~~ Kids R Us LLC;
- j. M&T Bank account with account number XXXXXX0590, standing in the name of J Country Farm Estates;
- k. Mid-Hudson Valley Federal Credit Union account corresponding to account number XXXX9399, standing in the name of J Country Farm Estates LLC dba J Vineyard Estates;
- l. Ulster Federal Credit Union account corresponding to account number XXX50-009, standing in the name of J Business Ventures LLC;
- m. Ulster Federal Credit Union account corresponding to account number XXX50-025, standing in the name of J Business Ventures LLC;
- n. Ulster Federal Credit Union account corresponding to account number XXX39-903, standing in the name of Jean Lavanture;

- o. PNC Bank account number XXXXXX6092, standing in the name of Ti Pouchon Ti Pouchonne LLC;
 - p. PNC Bank account number XXXXXX7423, standing in the name of Ti Pouchon Ti Pouchonne LLC;
 - q. PNC Bank account number XXXXXX6105, standing in the name of The Tristian Group LLC;
 - r. PNC Bank account number XXXXXX7415, standing in the name of The Tristian Group LLC
 - s. TD Bank account number XXXXXX5074, standing in the name of Jean Lavanture;
 - t. TD Bank account number XXXXXX 5066, standing in the name of Kuba Arts LLC;
 - u. U.S. Bank account no. XXXXXXXXX 6042, standing in the name of J Business Ventures LLC; and
 - v. A money judgment in the amount of the unrecovered proceeds personally obtained by the defendant as a result of the offenses of conviction.
3. If any of the property described above, as a result of any act or omission of the defendant:
- a. Cannot be located upon the exercise of due diligence;
 - b. Has been transferred or sold to, or deposited with, a third party,
 - c. Has been placed beyond the jurisdiction of the court;
 - d. Has been substantially diminished in value; or

e. Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: October 1, 2020

A TRUE BILL, Name redacted



Grand Jury Foreperson

ANTOINETTE T. BACON
Acting United States Attorney

By:



Michael Barnett
Joshua R. Rosenthal
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