

JAN 11 2021

JAMES N. HATTEN, Clerk
By:  Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

HUNTER VANPELT A/K/A
HUNTER LAUREN VANPELT
A/K/A ELLEN CORKRUM A/K/A
ELLEN YABBA KWAME
CORKRUM

Criminal Information

No. 1:21-CR-00006

THE UNITED STATES ATTORNEY CHARGES THAT:

Count One
Bank Fraud

1. From on or about April 27, 2020 through on or about June 17, 2020, in the Northern District of Georgia and elsewhere, the defendant, HUNTER VANPELT a/k/a HUNTER LAUREN VANPELT a/k/a ELLEN CORKRUM a/k/a ELLEN YABBA KWAME CORKRUM did knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of those financial institutions, in violation of Title 18, United States Code, Section 1344.

Background

At times relevant to this Information:

The Small Business Administration

2. The United States Small Business Administration (SBA) was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses. The mission of the SBA was to maintain and strengthen the nation's economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters.

3. As part of this effort, the SBA enabled and provided for loans through banks, credit unions, and other lenders. These loans had government-backed guarantees.

The Paycheck Protection Program

4. The Coronavirus Aid, Relief, and Economic Security (CARES) Act was a federal law enacted in or about March 2020 and was designed to provide emergency financial assistance to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic.

5. One source of relief that the CARES Act provided was the authorization of up to \$349 billion in forgivable loans to small businesses for payroll, mortgage interest, rent/lease, and utilities, through a program referred to as the Paycheck Protection Program (PPP). In April 2020, Congress authorized up to \$310 billion in additional PPP funding.

6. The PPP allowed qualifying small businesses and other organizations to receive PPP loans. Businesses must use PPP loan proceeds for 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 these expense items within a designated period of time and used a certain percentage of the PPP loan proceeds for payroll expenses.

7. The amount of a PPP loan that a small business may have been entitled to receive was determined by the number of employees employed by the business and the business's average monthly payroll costs.

8. In order to obtain a PPP loan, a qualifying business was required to submit a PPP loan application, which was signed by an authorized representative of the business. The PPP loan application required 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 (through its authorized representative) had to state, among other things, its (a) average monthly payroll expenses and (b) 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 had to provide documentation showing their payroll expenses.

9. Specifically, the applicant had to certify the following:

The funds will be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments, as specified under the Paycheck Protection Program Rule; I understand that if the funds are knowingly used for unauthorized purposes, the federal government may hold me legally liable, such as for charges of fraud.

10. The SBA oversaw the PPP. However, individual PPP loans were issued by private, approved lenders who received and processed PPP applications and supporting documentation directly or through third-party processors, and then made loans using the lenders' own funds, 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.

The Defendant

11. ELLEN CORKRUM a/k/a ELLEN YABBA KWAME CORKRUM changed her name to HUNTER LAUREN VANPELT a/k/a HUNTER VANPELT in or about July 2016. VANPELT used both names, VANPELT and CORKRUM, after changing her name to VANPELT, and submitted PPP loan applications under both names. VANPELT was a resident of Roswell, Georgia.

Relevant Financial Institutions and Affiliates

12. Financial Institution 1 was an FDIC-insured financial institution based in San Francisco, California. Financial Institution 1 was an SBA-approved lender and participated as a PPP lender.

13. Financial Institution 2 was an FDIC-insured financial institution based in Salt Lake City, Utah. Financial Institution 2 was an SBA-approved lender and participated as a PPP lender.

14. Financial Institution 3 was an FDIC-insured financial institution based in Fort Lee, New Jersey. Financial Institution 3 was an SBA-approved lender and participated as a PPP lender.

15. Financial Institution 4 was an FDIC-insured financial institution based in Salt Lake City, Utah. Financial Institution 4 was an SBA-approved lender and participated as a PPP lender.

16. Company 1 was a financial technology company based in Redwood City, California. Company 1 participated in the PPP by, among other things, acting as a service provider between small businesses and certain lenders, including Financial Institution 2 and Financial Institution 3. Small businesses seeking PPP loans could apply through Company 1 for PPP loans. Company 1 would review the PPP loan applications. If a PPP loan application received by Company 1 was approved for funding, a partner lender, such as Financial Institution 2 and Financial Institution 3, disbursed the PPP loan funds to the applicant.

Manner and Means

17. From on or about April 27, 2020 to on or about June 17, 2020, false and fraudulent PPP loan applications were submitted on behalf of six entities associated with VANPELT. The amounts requested in the six PPP loans totaled \$7,943,591.50, of which \$6,017,066.50 was disbursed as follows:

PPP Applicant	Lender	Approx. Date	Claimed # of Emp.	Claimed Avg Monthly Payroll	Loan Amount Sought	Loan Amount Received
Georgia Nephrology Physician Associated	Financial Institution 1	4/27/2020	12	\$197,951	\$494,877	\$494,877
United Healthcare Group & Co.	Financial Institution 2	4/30/2020	31	\$230,849	\$577,122	\$577,122

PPP Applicant	Lender	Approx. Date	Claimed # of Emp.	Claimed Avg. Monthly Payroll	Loan Amount Sought	Loan Amount Received
Nephrology Network Group LLC	Financial Institution 2	5/13/2020	86	\$659,342	\$1,648,355	\$1,648,355
First Corporate International	Financial Institution 3	5/14/2020	86	\$659,342	\$1,648,355	\$1,648,355
Corkrum Consolidated Inc.	Financial Institution 2	6/16/2020	91	\$770,610	\$1,926,525	\$0
Kiwi International Inc.	Financial Institution 4	6/17/2020	86	\$659,343	\$1,648,357.50	\$1,648,357.50
				TOTALS:	\$7,943,591.50	\$6,017,066.50

Fraudulent PPP Loan Applications

18. VANPELT owned or controlled the six entities that sought the PPP loans described above: Georgia Nephrology Physician Associated, United Healthcare Group & Co., Nephrology Network Group LLC, First Corporate International, Corkrum Consolidated Inc., and Kiwi International Inc. (collectively, the "VANPELT Entities").

19. VANPELT submitted and caused to be submitted six false and fraudulent PPP loan applications on behalf of the VANPELT Entities to Financial Institution 1, Financial Institution 2, Financial Institution 3, Financial Institution 4, and Company 1. VANPELT signed two of these PPP loan applications using the HUNTER VANPELT name, signed one of the PPP loan applications using the HUNTER LAUREN VANPELT name, and signed three of the PPP loan applications using the ELLEN CORKRUM name.

20. In each of the PPP loan applications for the VANPELT Entities, VANPELT falsely certified that all information therein and in the supporting documents was true and accurate.

21. In each of the PPP loan applications for the VANPELT Entities, VANPELT falsely represented the average monthly payroll and the number of employees working for the VANPELT Entities.

22. In support of each of the PPP loan applications for the VANPELT Entities, VANPELT submitted false Internal Revenue Service (IRS) records.

23. In support of the PPP loan applications for United Healthcare Group & Co., Nephrology Network Group LLC, First Corporate International, and Corkrum Consolidated Inc., VANPELT submitted false bank statements that purported to be from accounts associated with each of these entities.

24. In support of the PPP loan application for Kiwi International Inc., VANPELT submitted false payroll reports.

25. Based on the false and fraudulent PPP loan applications and supporting documents submitted or caused to be submitted by VANPELT, Financial Institution 1, Financial Institution 2, Financial Institution 3, Financial Institution 4, and Company 1 approved five PPP loan applications and disbursed \$6,017,066.50 in PPP loan proceeds to accounts controlled by VANPELT.

26. The PPP loan proceeds were not used for payroll or for other authorized PPP business expenses.

Execution of the Scheme to Defraud

27. Among other executions of the scheme, on or about April 30, 2020, in the Northern District of Georgia and elsewhere, the defendant, HUNTER VANPELT a/k/a HUNTER LAUREN VANPELT a/k/a ELLEN CORKRUM a/k/a ELLEN YABBA KWAME CORKRUM, did knowingly execute and

attempt to execute the above-described scheme to defraud by submitting a false and fraudulent PPP loan application to Financial Institution 2, through Company 1, on behalf of United Healthcare Group & Co., that included false representations and certifications, false IRS records, and a false bank statement.

All in violation of Title 18, United States Code, Section 1344.

Forfeiture Allegation

28. Upon conviction of the offense alleged in Count One of this Criminal Information, the defendant, HUNTER VANPELT a/k/a HUNTER LAUREN VANPELT a/k/a ELLEN CORKRUM a/k/a ELLEN YABBA KWAME CORKRUM, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, the following:

- a) MONEY JUDGMENT: A sum of money in United States currency, representing the amount of proceeds obtained as a result of the offense for which the defendant is convicted.
- b) FUNDS:
 - 1) \$8,401.00 in U.S. Currency seized from the defendant's residence on or about October 6, 2020;
 - 2) \$216,474.36 in funds seized from Navy Federal Credit Union Account Number ending 8872 held in the name of Hunter Lauren VanPelt;

- 3) \$2,685.36 in funds seized from Minnco Credit Union Account Number ending 6906 held in the name of Lucretia K. Turnquist;
- 4) \$91,574.53 in funds seized from JPMorgan Chase Bank Account Number ending 3083 held in the name Corkrum Consolidated Inc.;
- 5) \$69,636.43 in funds seized from JPMorgan Chase Bank Account Number ending 3611 held in the name of Kiwi International Inc.;
- 6) \$1,666,755.44 in funds seized from JPMorgan Chase Bank Account Number ending 6303 held in the name of First Corporate International, Inc.; and
- 7) \$21,854.00 in funds seized from JPMorgan Chase Bank Account Number ending 9031 held in the name of Nephrology Network Group LLC.

29. 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 intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States, Section 982(b)(1), to seek

forfeiture of any other property of said defendant up to the value of the above
forfeitable property.

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