

FILED

DEC 15 2020

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,	)	Case No. <u>20 CR 327 JED</u>
	)	
Plaintiff,	)	<u>INFORMATION</u>
	)	[18 U.S.C. § 1028A(a)(1): Aggravated
v.	)	Identity Theft;
	)	Forfeiture Allegation: 18 U.S.C. §§
ADAM WINSTON JAMES,	)	982(a) and 1028(b)(5), and 28 U.S.C.
	)	§ 2461 – Identity Theft Forfeiture]
Defendant.	)	

THE UNITED STATES ATTORNEY CHARGES:

On or about May 6, 2020, in the Northern District of Oklahoma, the defendant **ADAM WINSTON JAMES (“JAMES”)**, executed, and attempted to execute, a scheme and artifice to defraud Regent Bank, a financial institution, and to obtain money and property from Regent Bank by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made (“the Scheme”). As part of the Scheme, **JAMES** applied for a Paycheck Protection Program (PPP) loan on behalf of a company he claimed to own and operate, Velocity Innovations LLC. In connection with that application, **JAMES** knowingly transferred, possessed, and used, without lawful authority, the means of identification of other people, known to the United States Attorney and designated herein as H.R., S.S., M.M., A.J., D.M., G.L., and L.M., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, Bank Fraud, in violation of Title 18, United States Code, Section 1344, knowing that the means of identification belonged to actual people.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION
[18 U.S.C. §§ 982(a) and 1028(b)(5), and 28 U.S.C. § 2461(c)]

The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a) and 1028(b)(5), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense alleged in this Information, as a part of his sentence, the defendant, **ADAM WINSTON JAMES**, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a) and 1028(b)(5), and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, and personal property used, or intended to be used, to commit the offense. The property to be forfeited includes, but is not limited to:

MONEY JUDGMENT

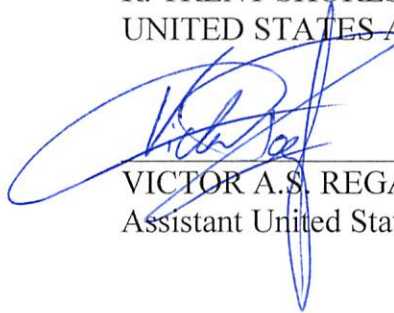
A money judgment in an amount representing proceeds obtained by **ADAM WINSTON JAMES** as a result of the aggravated identity theft offense.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been

commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Sections 982(a) and 1028(b)(5), and Title 28, United States Code, Section 2461(c).

R. TRENT SHORES
UNITED STATES ATTORNEY



VICTOR A.S. REGAL
Assistant United States Attorney