

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

UNITED STATES OF AMERICA

v.

Case No. 2:21-cr-107-SPC-KCD

EDRICA LEANN WATSON

UNOPPOSED MOTION TO SUBSTITUTE THE VICTIM

The United States of America respectfully requests under 18 U.S.C. § 3663A(a)(1)–(2), that the victim, Customers Bank, be substituted by the United States Small Business Administration (“SBA”) as a victim in the above referenced case. (Doc. 56).

MEMORANDUM IN SUPPORT

The Coronavirus Aid, Relief, and Economic Security (CARES) Act, as amended by the Economic Aid to Hard-Hit Small Businesses, Nonprofits and Venues Act, the American Rescue Plan Act of 2021, and the PPP Extension Act of 2021, authorized SBA to guarantee loans under the Paycheck Protection Program (PPP).

The United States was previously notified that SBA purchased the guaranty for the lender, Itria Ventures, for loans comprising a portion of the restitution order. The parties agreed that the SBA should be substituted as the victim and the Court entered an endorsed order granting the substitution. Docs. 60 and 61.

The United States Attorney's Office has been notified by the SBA that it also paid Customers Bank (Loan number 4234108705) the amount of restitution due to them. *See* SBA Certified Statement of Account as to Loan 4234108705, attached as Exhibit A. The SBA should now be named as the successor victim. Therefore, the United States respectfully requests that this Court issue an Order directing the Clerk's Office, United States District Court, to substitute the SBA as the victim in this matter in place of Customers Bank and to direct all current and future payments that would otherwise be sent to Customers Bank to now be made payable and sent to SBA until the restitution has been paid in full.

In accordance with Local Rule 3.01(g), the undersigned has conferred with Edrica Watson who advised that she has no objection to the requested substitution.

Respectfully submitted,

GREGORY W. KEHOE
United States Attorney

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CERTIFICATE OF SERVICE

I certify that on June 4, 2026, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all parties of record and via mail to:

Edrica Watson
Daytona Beach, Florida

s/ Julie A. Simonsen
Assistant United States Attorney