

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,
ex rel. VERITY INVESTIGATIONS
LLC,

Plaintiff-Relator,

v.

MARCUS EVANS INC.,

Defendant.

Civil Action No. 25-413-CFC
FILED UNDER SEAL

**UNITED STATES’ *EX PARTE* NOTICE OF INTERVENTION AND
REQUEST TO PARTIALLY LIFT THE STATUTORY SEAL**

Pursuant to the False Claims Act, 31 U.S.C. §§ 3730(b)(4)(A), the United States notifies the Court that it hereby intervenes in this action, which alleges that Defendant Marcus Evans, Inc. (“Defendant”) defrauded the United States by falsely certifying that it was eligible to receive loans under the Paycheck Protection Program because Defendant—when combined with its affiliated entities—was not an eligible small business concern under the applicable regulations in violation of 31 U.S.C. § 3729(a).

The United States, Defendant, and the Relator executed a settlement agreement effective February 20, 2026 (“Settlement Agreement”), which resolves this False Claims Act action as to the federal government. Pursuant to the Settlement Agreement, the United States and the Relator will file a Joint Stipulation of

Dismissal of this case pursuant to Rule 41(a)(1) after Defendant has made the initial settlement payment to the United States as required by the Settlement Agreement.

Finally, the United States requests that the relator's Complaint, this Notice, and the attached proposed Order be unsealed. The United States requests that all other papers on file in this action remain under seal because, in discussing the content and extent of the United States' investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

A proposed order is attached.

Respectfully submitted,

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/s/ Jacob Laksin

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Dated: February 24, 2026

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[PROPOSED] ORDER

The United States having intervened in this action pursuant to the False Claims Act *qui tam* case, it is hereby ORDERED that:

1. The Complaint, the United States' Notice of Intervention to Decline Intervention, and this Order shall be unsealed;
2. The seal shall be lifted on all matters occurring in this action after the date of this Order;
3. The United States shall provide a copy of this Order to all parties.

IT IS SO ORDERED, this ____ day of _____, 2026.

Honorable Colm F. Connolly
Chief United States District Judge