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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America
v.
D-1 Peter Valente
D-2 Angela Hilal Toma

Case No. Case: 2:26−mj−30001
Assigned To : Unassigned
Assign. Date : 1/5/2026
Description: CMP USA V. VALENTE ET AL (DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2020 through October 2023 in the county of Wayne and Oakland in the Eastern District of Michigan, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud
18 U.S.C. § 1503	Obstruction of Justice

This criminal complaint is based on these facts:
see attached affidavit.

☑ Continued on the attached sheet.

Complainant's signature

Victor VanMeerbeeck, Special Agent (HSI)
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 5, 2026

Judge's signature

City and state: Detroit, Michigan

Hon. Kimberly G. Altman, United States Magistrate Judge
Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

D-1 PETER VALENTE, and D-2 ANGELA HILAL TOMA, Defendants.	Case No. **Filed Under Seal**

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Victor VanMeerbeeck, being first duly sworn, hereby depose and state as follows:

I. Executive Summary

1. I make this affidavit in support of a criminal complaint and arrest warrants against both PETER VALENTE and ANGELA HILAL TOMA for violating 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) and against PETER VALENTE alone for violating 18 U.S.C. § 1503 (Obstruction of Justice). VALENTE and TOMA—who during the periods referenced in this affidavit were husband and wife—collaborated to fraudulently obtain $2,609,210 from the Paycheck Protection Program. After learning of the investigation, VALENTE obstructed justice by approaching the Government and falsely telling this affiant that he did not learn about the scheme until it was complete, and that TOMA had

obtained VALENTE's business records to alter for use in the scheme by hacking VALENTE's phone.

2. An introduction and agent background are in ¶¶ 3-5. Applicable statutes are in ¶¶ 6-7. Background on the Paycheck Protection Program and Economic Injury Disaster Loan Program is at ¶¶ 12-19. A summary of key investigative findings is in ¶¶ 20-22, with more detail in the paragraphs that follow. These include VALENTE's statements to this affiant implicating his wife but not himself, and the text messages demonstrating the material falsity of many of his statements, in ¶¶ 67-105.

II. Introduction and Agent Background

3. I have been a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations since November of 2009. I was a member of the High Intensity Drug Trafficking Area (HIDTA) Task Force operating out of the Phoenix, Arizona Office of Investigations for eight (8) years. I am currently assigned to the financial group in Detroit, MI investigating violations of federal law. I am a graduate of the Criminal Investigator Training Program and the Immigration and Customs Enforcement Special Agent Training Program at the Federal Law Enforcement Training Center at Glynco, Georgia. I am a graduate of Michigan State University

with a Bachelor of Arts Degree in Finance.

4. The information contained in this affidavit is based upon my personal knowledge, training and experience, as well as the combined knowledge, training and experience of other law enforcement officers and agents with whom I have had discussions, and information obtained from witnesses, other special agents, criminal analysts, documents, and government databases.

5. This affidavit is submitted for the limited purpose of securing a criminal complaint and arrest warrants; therefore, this affidavit does not contain every fact that I have learned during the investigation. I have only set forth the facts necessary to establish probable cause to believe that Defendants violated the statutes identified above.

III. Applicable Statutes

6. 18 U.S.C. § 1349 (Attempt and Conspiracy) criminalizes attempting or conspiring to commit any offenses under Chapter 63 of 18 U.S.C., including a violation of 18 U.S.C. § 1343 (Wire Fraud). 18 U.S.C. §1343 criminalizes schemes or artifices to defraud, or obtaining money or property by means of false or fraudulent pretenses, representations, or promises, when for the purpose of executing the scheme, the person transmits, or causes to be transmitted, any

writings, signs, signals, pictures, or sounds by means of wire communication in interstate commerce.

7. 18 U.S.C. § 1503 (Obstruction of Justice) criminalizes, inter alia, corruptly influencing, obstructing, impeding, or endeavoring to influence, obstruct, or impede, the due administration of justice. It requires proof of three elements: "(1) there was a judicial proceeding; (2) the defendant had knowledge or notice of the pending proceeding; and (3) the defendant acted corruptly with the intent of influencing, obstructing, or impeding the proceeding in the due administration of justice." *United States v. Collis*, 128 F.3d 313, 318 (6th Cir. 1997).

8. Based on the facts as set forth in this affidavit, there is probable cause to believe that PETER VALENTE and ANGELA TOMA conspired to submit false Payroll Protection Program (PPP) loan applications, and false Economic Injury Disaster Loan (EIDL) applications. In doing so, ANGELA TOMA and PETER VALENTE conspired to obtain money or property by means of false and fraudulent pretenses and representations, facilitated using interstate wire communications.

9. Furthermore, as detailed below, PETER VALENTE—with knowledge of the ongoing investigation—conducted three voluntary interviews with federal investigators, and in each interview falsely asserted and maintained

that TOMA committed PPP fraud on her own, without his knowledge or collaboration. This conduct impeded and delayed the investigation.

IV. Defendants

10. PETER VALENTE is a 52-year-old male, believed to reside in West Bloomfield, Michigan.

11. ANGELA TOMA is a 45-year-old female, believed to reside in Southfield, Michigan.

V. The Paycheck Protection Program

12. The Coronavirus Aid, Relief, and Economic Security (CARES) Act was a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to the millions of Americans suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of forgivable loans to small businesses for job retention and certain other expenses through a program referred to as the Paycheck Protection Program (PPP). In or around April 2020, Congress authorized over $300 billion in additional PPP funding.

13. The PPP is administered by the United States Small Business Administration (SBA). In order to obtain a PPP loan, a qualifying business must submit a PPP loan application, which is signed by an authorized representative of

the business. The PPP loan application requires the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications to be eligible to obtain the PPP loan. The PPP loan applications include an SBA Borrower Application Form. The form includes a certifications and authorizations portion. In the PPP loan application, the small business (through its authorized representative) must state, among other things, its average monthly payroll expenses and number of employees. These figures are used to calculate the amount of money the small business is eligible to receive under the PPP. In addition, businesses applying for a PPP loan must provide documentation showing their payroll expenses.

14. A PPP loan application must be processed by a participating lender. If a PPP loan application is approved, the participating lender funds the PPP loan using its own monies, which are 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, is transmitted by the lender to the SBA in the course of processing the loan.

15. PPP loan proceeds must be used by the business on certain permissible expenses, such as: payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal on the PPP loan to be entirely forgiven if the

business spends the loan proceeds on these expense items within a designated period of time after receiving the proceeds and uses a certain amount of the PPP loan proceeds on payroll expenses.

VI. The Economic Injury Disaster Loan Program

16. The Economic Injury Disaster Loan ("EIDL") program is an SBA program that provides low-interest financing to small businesses, renters, and homeowners in regions affected by declared disasters.

17. The CARES Act authorized the SBA to provide EIDLs to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic. In addition, the CARES Act authorized the SBA to issue advances of up to $10,000 to small businesses within three days of applying for an EIDL. The amount of the advance is determined by the number of employees the applicant certifies having. The advances do not have to be repaid.

18. In order to obtain an EIDL and advance, a qualifying business must apply to the SBA and provide information about its operations, such as the number of employees, gross revenues for the 12-month period preceding the disaster, and cost of goods sold in the 12-month period preceding the disaster. In the case of EIDLs for COVID-19 relief, the 12-month period was that preceding

January 31, 2020. The applicant must also certify that all of the information in the application is true and correct to the best of the applicant's knowledge.

19. EIDL applications are submitted directly to the SBA and processed by the agency with support from a government contractor, Rapid Finance. The amount of the loan, if the application is approved, is determined based, in part, on the information provided in the application about employment, revenue, and cost of goods, as described above. Any funds issued under an EIDL or advance are issued directly by the SBA. EIDL funds can be used for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments. If the applicant also obtains a loan under the Paycheck Protection Program, the EIDL funds cannot be used for the same purpose as the Paycheck Protection Program funds.

VII. Summary of the Investigation

20. **PPP Fraud:** In October 2020, Special Agents of HSI initiated an investigation into ANGELA TOMA and discovered TOMA was the recipient of SBA PPP loans for three separate businesses – Detroits Red Light District 2 LLC,

Building Detroit Group LLC, and DF Worldwide.[1] Through February of 2021, TOMA had received $2,609,210 in funds for these three businesses from the SBA. Investigation reveals that fraudulent documents were provided with the electronically submitted SBA loan applications, and the SBA funds were not used as required by the PPP program. In short, the businesses were never operational, and the financial figures and documents provided in support of the PPP applications were fabricated.

21. **EIDL Fraud:** In addition, between April 2020 and August 2020, Toma submitted at least five EIDL loan applications to the SBA in the names of four business entities: Detroits Red Light District 2 LLC, Giving Back 2 Detroit, Angela Hilal Toma Corporation, and Building Detroit Group LLC.

22. As in the PPP context, these businesses were never operational, and the financial figures and documents provided in support of the EIDL applications were fabricated. Although most of these applications were declined, the SBA did give a $4,000.00 EIDL advance into the account for Detroit's Red Light District 2.

[1] Your affiant has seen DF Worldwide referred to with a variety of labels, but "DF Worldwide" was how it was labeled in the PPP application.

23. Text messages between TOMA and VALENTE revealed that VALENTE was aware of the fraudulent scheme, actively assisted TOMA in preparing and submitting the fraudulent applications, and directed TOMA to transfer over $1,000,000 of the ill-gotten gains to bank accounts under his control. Bank records show that VALENTE used the fraudulently obtained funds to pay off debts, among other expenses. TOMA primarily used her portion of the proceeds on personal living expenses.

VIII. Probable Cause

Recipients of PPP Funds

24. Your affiant reviewed public records which indicated that all three businesses that applied for PPP funds had the same listed resident agent, ANGELA TOMA. Granite Fabricators Building Detroit Group LLC was organized on or about August 23, 2017, and its name was changed to Building Detroit Group LLC on August 18, 2020. Detroits Red Light District 2 LLC was organized on June 9, 2015, and DF Worldwide was incorporated on November 2, 2018.

25. Using an open-source website, an HSI Detroit Criminal Analyst reviewed publicly available loan information relating to the PPP. A review of this information revealed that DF Worldwide and Detroits Red Light District 2 LLC both had approved loans using the same reported address of 26400 W. 8 Mile

Road, Southfield, MI 48033. Building Detroit Group LLC also had approved loans with a reported address 26530 W. 8 Mile Road, Southfield, MI 48033. Physical surveillance of both locations revealed that 26400 W. 8 Mile Road is a business, Safe Keeping Self Storage, which rents out individual offices within the building, while 26530 W. 8 Mile Road is a commercial building with a sign that reads "Granite Source of Michigan."

26. A request to the state of Michigan revealed that there were no state employment records or quarterly wages for any of the three businesses.

27. Your affiant reviewed federal tax information and determined that the entities referenced in paragraph 12 – Detroits Red Light District 2 LLC, Building Detroit Group LLC, and DF Worldwide – did not file federal tax returns for tax years 2018-2021.

28. Your Affiant reviewed records received from Bank of America regarding bank accounts belonging to DF Worldwide, Detroits Red Light District 2 LLC, and Building Detroit Group LLC. Analysis of the credit transactions from the statements identified $2,610,660 in funds received from outside sources with $2,609,210 (99.94%) stemming from approved PPP loans.

Use of PPP Funds

29. Analysis of the debit transactions did not identify any formal payroll

structure present in most of these business bank accounts. Most of the funds were sent to external business accounts, external individual accounts, or withdrawn as cash. Approximately $1,099,675 of the funds leaving the accounts were paid to three recipients: CRW Inc., Granite Fabricators, and PETER VALENTE. VALENTE was identified as ANGELA TOMA's husband and was linked to both CRW Inc. and Granite Fabricators.

30. An examination of the cleared check images revealed that the memo lines referenced "payroll" or "payroll reimbursement" on all but one of the handwritten checks, despite the recipient being Valente and his businesses. The remaining check, written to Granite Fabricators, referenced "rent". All the written checks to CRW, Granite Fabricators, and VALENTE were deposited at various Fifth Third Bank accounts, and VALENTE appeared to be the endorser of all the checks. There were three checks made out to CRW Inc. totaling $35,100.00 that referenced April 2020 payroll, and four checks made out to Granite Fabricators totaling $50,250.00 that referenced April 2020 payroll. There were five checks to Granite Fabricators totaling $78,900.00 that referenced May payroll. Several of the checks had multiple months written on the memo line. All the checks to Granite Fabricators and CRW Inc. were written in round dollar amounts.

31. The check written out to VALENTE, in the amount of $40,000, stated "Payroll reimbursement + gift" on the memo line.

32. There were two checks written to Individual 1, each for $20,000, that referenced payroll for either April 2020 or May 2020. Individual 1 did not receive additional checks for other months. Individual 1 has been identified as TOMA's sister.

33. There was one illegible check that appeared to have been deposited into a Bank of America account for the Bright Horizon's Children Center, doing business as West Bloomfield Campus. Open-source research identified this business as child care/preschool located at 2965 Walnut Lake Road, West Bloomfield, MI 48323.

34. Approximately $207,949.07 was spent on apparent living expenses: purchases for restaurants, e- commerce businesses, clothing stores, grocery stores, furniture stores, gas stations, ride-share services, hotels, and airlines. For example, there were 219 transactions conducted with the food delivery service, Door Dash, totaling $20,529.35.

35. The signature cards provided by Bank of America for the business accounts listed ANGELA TOMA as the account owner. Some additional details on these accounts:

- Account #XXXXXXXX8386: Building Detroit Group LLC, EIN XXXXX4004. The signature card was dated July 18, 2020. This account received $616,800.00 from SBA on August 17, 2020; received another $616,800.00 from SBA on March 9, 2021.
- Account #XXXXXXXX8470: DF Worldwide, EIN XXXXX0028. The signature card was dated July 18, 2020. This account received $266,670.00 from SBA on August 18, 2020; received another $266,670.00 from SBA on March 23, 2021.
- Account #XXXXXXXX0406: Detroits Red Light District 2 LLC, EIN XXXXX1874. The signature card was dated July 24, 2020. This account received $421,030.00 from SBA on August 25, 2020; received another $421,240.00 from SBA on February 17, 2021.

36. Bank of America closed the accounts in June 2021 with approximately $910,103.02 remaining across the seven accounts.

37. Your affiant reviewed records received from Fifth Third Bank regarding bank accounts and credit card accounts belonging to Granite Fabricators & Tile Center LLC, CRW Inc., Detroits Red Light District 2 LLC, PETER VALENTE, and ANGELA TOMA. VALENTE, by himself, was identified as the authorized signer for CRW Inc. and Granite Fabricators.

38. The Fifth Third Bank records included information on Essential Checking Account XXXXXX9733, belonging to VALENTE, to include statements, deposit images, and a signature card. This account had an open date of August 11, 2020. A summary of the incoming transactions showed that a wire was received from Bank of America account #XXXXXXXX6666, owned by

Building Detroit Group LLC with TOMA as the sole owner, ten (10) days after the account was opened in the amount of $75,000.00. On August 28, 2021, a check for $40,000.00 was received from Bank of America account #XXXXXXXX0406, owned by TOMA/ Detroits Red Light District 2 LLC, with the note "Payroll Reimbursement + Gift". On January 4, 2021, a check for $50,000.00 was received from Granite Source of Michigan with the note "Loan paid back".

39. These two checks and the wire originated from TOMA's accounts that were funded with SBA loans. A summary of the outgoing transactions from Bank of America account #XXXXXXXX6666 revealed that a wire in the amount of $141,760.46 was sent to Midwest Title LLC on November 3, 2020. Based on open-source research, VALENTE and TOMA purchased 3865 Stonecrest Road, West Bloomfield, MI, on November 3, 2020, for $610,000.00. An additional $9,682.74 was paid to Lake Michigan Credit Union in two mortgage payments, the first of which occurred approximately two months after the wire.

40. Your affiant reviewed records received from Midwest Title LLC regarding the purchase of 3865 Stonecrest Road, West Bloomfield, MI. According to the title records, VALENTE wired $141,760.46 from a Fifth Third Bank

account on or around November 3, 2020, for the down payment to purchase 3865 Stonecrest Road for $610,000. The mortgage was obtained from Lake Michigan Credit Union which stated this would be the new primary residence for VALENTE and TOMA. TOMA was a signatory on the settlement statement but not on the mortgage note.

Further Detail of Falsity in PPP Applications

41. Your affiant reviewed records received from Newtek Small Business Finance LLC regarding the Payroll Protection Program (PPP) loan application which TOMA submitted to them electronically.

42. A review of the documents provided by Newtek Small Business Finance LLC revealed that TOMA provided quarterly federal tax filings for Detroit Building Group LLC dating back to the 1st quarter of 2019 through the 1st quarter of 2020 to Newtek in support of the PPP loan application. Your affiant communicated with the Internal Revenue Service (IRS) regarding any federal business filings for TOMA's companies and the IRS confirmed that there were no tax returns for any of her businesses from 2018 to 2021. In addition, TOMA supplied a monthly bank statement from Bank of America for business account #XXXXXXXX8386 for February 2020. According to a previous subpoena

response from Bank of America regarding this specific account number, the account was not opened until months later: July 20, 2020. Your affiant sent a copy of this February 2020 statement to a representative for Bank of America who confirmed that the statement was fictitious.

43. The annual statements for 2018, 2019, and 2020 were all filed through the State of Michigan Licensing and Regulatory Affairs on July 18, 2020, with a Certificate of Restoration of Good Standing being issued on July 31, 2020. In other words, Building Detroit Group LLC was not in good standing with the State of Michigan for the two years prior to applying for PPP loans.

44. TOMA made the following certifications and authorizations on her Newtek PPP application:

- All SBA loan proceeds will be used only for business-related purposes as specified in the loan application and consistent with the Paycheck Protection Program Rule.
- The Applicant was in operation on February 15, 2020, and had employees for whom it paid salaries and payroll taxes or paid independent contractors, as reported on Form(s) 1099-MISC.
- Current economic uncertainty makes this loan request necessary to support the ongoing operations of the Applicant.
- 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; and that she understand that if the funds are knowingly used for unauthorized

purposes, the federal government may hold her legally liable, such as for charges of fraud.

- The documentation provided by the Borrower to the Lender verifying the number of full-time equivalent employees on the Borrower's payroll as well as the dollar amounts of payroll costs, covered mortgage interest payments, covered rent payments, and covered utilities is accurate in all respects.

- The information provided in this application and the information provided in all supporting documents and forms is true and accurate in all material respects. I understand that knowingly making a false statement to obtain a guaranteed loan from SBA is punishable under the law, including under 18 USC 1001 and 3571 by imprisonment of not more than five years and/or a fine of up to $250,000; under 15 USC 645 by imprisonment of not more than two years and/or a fine of not more than $5,000; and, if submitted to a federally insured institution, under 18 USC 1014 by imprisonment of not more than thirty years and/or a fine of not more than $1,000,000.

45. In August 2022, your affiant reviewed records received from Cache Valley Bank regarding Payroll Protection Program (PPP) loan applications submitted electronically by ANGELA TOMA for DF Worldwide and Detroits Red Light District 2 LLC.

46. A review of all the quarterly wage reports provided on a spreadsheet by TOMA to Cache Valley Bank revealed that the salary payouts were identical for all four quarters of 2019 which signified that no employees received raises in 2019, worked overtime, or had unpaid time away from the company. These quarterly reports were similar to the reports received from Newtek for PPP loans

for Detroit Builders Group in that the wages were unchanged the whole year.

47. TOMA made the following certifications and authorizations throughout her Cache Valley Bank PPP applications:

- The Applicant has certified to the Lender that the Applicant is eligible under the Paycheck Protection Program Rules.
- The Applicant has certified to the Lender that (1) it was in operation on February 15, 2020, has not permanently closed, and was either an eligible self-employed individual, independent contractor, or sole proprietorship with no employees or had employees for whom it paid salaries and payroll taxes or paid independent contractors, as reported on Form(s) 1099-MISC; (2) current economic uncertainty makes this loan request necessary to support the ongoing operations of the Applicant; (3) the funds will be used to retain workers and maintain payroll, or make payments for mortgage interest, rent, utilities, covered operations expenditures, covered property damage costs, covered supplier costs, and covered worker protection expenditures; and (4) the Applicant has not and will not receive another loan under the Paycheck Protection Program, section 7(a)(36) of the Small Business Act (15 U.S.C. 636(a)(36)) (this does not include Paycheck Protection Program second draw loans, section 7(a)(37) of the Small Business Act (15 U.S.C. 636(a)(37)).

48. In her communications with Cache Valley Bank, TOMA supplied a bank statement purportedly from Bank of America for business account #375022628470, DF Worldwide, for the month of June 2020. Bank of America records for this specific account number show that the account was not opened until July 2020. A Bank of America representative explained that the statements were "forged," and that the checks and transactions did not appear in Bank of

America systems, and were not formatted in a manner used by Bank of America, indicating that the bank statements may have come from a different bank, with the headers changed to indicate Bank of America information.

49. In her communications with Cache Valley Bank, TOMA supplied a bank statement from Bank of America for business account #XXXXXXXX0406, Detroits Red Light District 2 LLC, for the month of February 2020. As previously stated, Bank of America records for this specific account number show that the account was not opened until July 2020. In addition, the account statement summary does not add up, as the ending balance is about $80,000 too much.

50. In October 2022, your affiant reviewed records received from the state of Michigan Unemployment Insurance Agency (UIA) related to ANGELA TOMA and three businesses for which she applied for PPP loans. UIA provided wage information for TOMA dating back to 2012. From 2013 to 2021, there is no wage information for TOMA. There is no mention of Building Detroit Group LLC, Detroits Red Light District 2 LLC, or DF Worldwide in TOMA's history of wages.

51. UIA also sent information regarding Building Detroit Group LLC, Detroits Red Light District 2 LLC, and DF Worldwide. UIA reported that there

were no records at all for any of these three businesses when queried by name or employer identification number (EIN).

False EIDL Applications

52. On March 7, 2024, Special Agent (SA) Victor VanMeerbeeck received a response to a request for loan applications and supporting documentation from the SBA regarding Angela TOMA and Peter VALENTE. The SBA provided six different applications originated by TOMA and/or VALENTE and a couple communication files.

53. A review of the first EIDL application for DETROITS RED LIGHT DISTRICT 2 submitted approximately April 8, 2020 showed that the email address, angela_toma@aol.com, was used along with phone number 248-470-1080. The SBA underwriter notated in the file that there was suspicious online behavior and that the application was declined for fraud. There was also a footnote stating, "Fraud found on related deal(s)."

54. TOMA stated that DETROITS RED LIGHT DISTRICT 2 LLC did gross revenue of $890,000 for the twelve months prior to January 31, 2020 and cost of good sold for the same time period was $740,000.

55. TOMA provided fraudulent bank statements for DETROITS RED LIGHT DISTRICT 2 LLC to support the loan application. TOMA also supplied

two false 2019 tax returns, one with the name BUILDING DETROIT GROUP on it for the application. The other tax return was identical but had the name DETROITS RED LIGHT DISTRICT 2 at the top. Based on previous information received (see ROI #DT02OR22DT0005-008), there were no financial records filed for any of TOMA's companies. A closer look at the return showed that the CPA firm listed as preparing the document, Rogers & Associates, did not exist at the address, 26169 W. Warren St, Dearborn Heights, MI 48127. An open source search did find a different CPA firm at the address, Moussawi & Associates CPA, with a telephone number of 313-757-7831. The phone number listed for Rogers & Associates was 313-667-7831. For the 2020 returns, Rogers and Associates CPA was located at 26389 W. Warrant St, Dearborn Heights, MI 48127, an address that does not exist. Rogers & Associates phone number was listed as 248-787-7831 which comes back to Ashley Nemeth in Grand Blanc, MI.

56. To support the application, TOMA provided false tax transcripts, which are fraudulent Internal Revenue Service (IRS) documents to prove that the IRS received the filed tax returns. The SBA submitted a request for the 1120s for years 2019, 2020, and 2021 on May 27, 2022 and received a response of "No record of return filed" for all years.

57. On February 25, 2022, a declination letter was issued to TOMA for

DETROITS RED LIGHT DISTRICT 2 for loan application 3303086685. The letter stated that there were "one or more items that were reviewed that caused the SBA to question the validity of certain information you submitted as part of your application. This can occur as a result of a failed identity verification, high risk IP address, or if a client device is associated with fraud."

58. Two letters from Department of Treasury were in the file stating Employer Identification Numbers (EIN) for Building Detroit Group and DETROITS RLDS LLC. Both letters stated that TOMA must file Form 1065, the business return for partnerships, and indicated that these forms had not been filed for several years for these businesses.

59. On April 11, 2020, TOMA applied for an EIDL loan for GIVING BACK 2 DETROIT. Based on the file provided, it appears that TOMA did not provide any documentation in support of this application.

60. On April 12, 2020, TOMA applied for an EIDL loan for ANGELA HILAL TOMA CORPORATION. Based on the file provided, it appears that TOMA did not provide any documentation in support of this application.

61. On June 11, 2020, TOMA applied again for an EIDL loan for ANGELA HILAL TOMA CORPORATION. Much of the data supplied for this application was different from the first app to include company start date, gross

revenue for previous twelve (12) months, and cost of goods sold for previous twelve months (12). Based on the file provided, it appears that TOMA did not provide any documentation in support of this application.

62. A review of the application submitted for BUILDING DETROIT GROUP revealed that there were fraudulent documents submitted for support of this loan application. Multiple fraudulent bank statements were provided as well as a forged 2019 business tax return.

63. A review of the application submitted under DF WORLDWIDE revealed that a fictitious business tax return for 2019 was submitted. An application for an EIDL loan was submitted using VALENTE's name on approximately December 30, 2021. The signature was not VALENTE's however.

IP Address Information Linked to Valente and Toma

64. In October 2022, your affiant received information from Comcast regarding subscriber information for several internet protocol (IP) addresses responsible for originating TOMA's PPP applications, including IP addresses 69.242.213.102 and 98.243.127.33.

65. Comcast stated that IP address 69.242.213.102 belongs to PETER VALENTE Jr, for service at 219 Windward Ct., Detroit, MI 48207, a location that

served as the primary residence for VALENTE and TOMA during the time period in question. The following email user IDs are associated with this account – "PETERVALENTE" and "fatinTOMA". This IP Address was used to sign for the Building Detroit Group's PPP application through Newtek Small Business Finance on August 13, 2020.

66. Comcast reported that IP address 98.243.127.33 belongs to "PETER Valenti" for service at 21944 Murray Crescent Dr., Southfield, MI 48076, which is the present address for TOMA's mother. The email user ID associated with this account is "fatinTOMA". This IP address was used to sign for the second PPP application for Building Detroit Group through Newtek Small Business Finance on February 25, 2021.

Statements by VALENTE

67. During the course of the investigation, VALENTE spoke with your affiant at the United States Attorney's Office in Detroit, MI on three occasions: May 2, 2023, August 17, 2023, and October 30, 2023. On each occasion, VALENTE was aware of an ongoing federal investigation into PPP fraud.

68. In the initial conversation, **May 2, 2023**, VALENTE stated that TOMA received PPP loans. VALENTE claimed that TOMA hacked his phone to obtain Granite Fabricators bank statements, referring to a company owned by

VALENTE. VALENTE further stated that TOMA edited these bank statements by changing his company name to hers for multiple applications.

69. **VALENTE stated that TOMA's companies have no revenue, no employees, and no tax returns. VALENTE explained that TOMA's companies exist only on paper.**

70. VALENTE said TOMA received $1.3M on the first round of PPP applications. VALENTE explained that he knows the above because he recovered this information from TOMA's email, ANGELA_TOMA@aol.com.

71. VALENTE stated that he believes $250,000 of the PPP funds were used for purchasing his home, 3865 Stonecrest in West Bloomfield, MI. VALENTE stated that TOMA told him that the money used for the down payment was her inheritance from her grandfather. VALENTE said the home is worth $1.2M and they owe $400,000.

72. VALENTE further stated TOMA possesses electronic devices, including a cell phone and two iPads. VALENTE also indicated that he saw one of the laptops belonging to TOMA at TOMA's mother's residence at 21944 Murray Crescent Dr., Southfield, MI 48076 with various documents in a bag in the garage.

73. At a 2nd interview with VALENTE on **August 17, 2023**, VALENTE stated that he found out around July 2022 that the money given to him from TOMA was from the PPP loans. He claimed to have found out about the PPP loans when mail started arriving asking for repayment in 2022.

74. VALENTE was asked if he created, or had a hand in creating, the fraudulent tax records to which he replied in the negative.

75. VALENTE said that TOMA's text messages would show her intent to apply for all of these loans.

76. VALENTE stated that he has no knowledge about an application for an Economic Injury Disaster Loan that was recovered during July 2023 search warrants.

77. At a 3rd interview of VALENTE on **October 30, 2023**, when pressed regarding the fact that over $1.2 million in fraudulent PPP funds went to accounts controlled by VALENTE or to the purchase of the Stonecrest house, VALENTE reiterated that TOMA told him that the funds to pay for the Stonecrest home were an inheritance from her grandfather.

78. VALENTE stated that TOMA made a "clone" of his cell phone and used it to obtain his bank statements.

Messages Between Valente and Toma

79. However, text messages and supporting information indicate that each of the above statements about VALENTE's lack of knowledge and collaboration in the PPP and EIDL fraud were false.

80. In July 2023, based on the information gathered throughout the investigation, your affiant obtained and executed search warrants for 3865 Stonecrest Road, West Bloomfield, MI 48322, 21944 Murray Crescent Drive, Southfield, MI 48076, and a Hummer vehicle located at the 3865 Stonecrest home in July of 2023, in case number 2:23−mc−51144.

81. More recently, on April 11, 2025, TOMA voluntarily provided access to all data retrieved from the iPhone seized from TOMA during the search warrants in 2023. Your affiant reviewed text conversations between Peter VALENTE and Angela TOMA which were present on that iPhone.

82. A review of the conversation between TOMA's iPhone and phone number (248) 343-4859 revealed over 22,000 messages exchanged. An open records search for (248) 343-4859 showed the phone number associated with Granite Fabricators & Tile Center and its owner, VALENTE.

83. In numerous messages, VALENTE and TOMA discuss the care of their son, and bicker over finances. They also periodically collaborate on applying for the PPP and EIDL loans, discuss the status of the applications, celebrate receiving the funds, and discuss how to use the money.

84. On March 27, 2020, VALENTE texted TOMA "We are now about to feel what it means to have no money".

85. On March 31, 2020, TOMA tells VALENTE to "complete" something for an SBA disaster loan. VALENTE responds that his partner applied for one for their other business, CRW.

86. On April 7, 2020, VALENTE sent TOMA a link to "https://covid19relief.sba.gov/#/" and says "This link gives initial $10k of loan." "Fill out this application under your company name. It's the sba 10000 forgivable. You will need your ein number apply for both your companies."

87. This belies VALENTE'S statements about having no knowledge of an EIDL loan—he suggested that TOMA apply.

88. On April 8, 2020, TOMA in fact applied for an EIDL loan under the company name DETROITS RED LIGHT DISTRICT 2 LLC. She stated the company gross revenue as $890,000.

89. On April 11, 2020, TOMA applied for an EIDL loan under the company name GIVING BACK 2 DETROIT. She stated the company gross revenue as $180,000.

90. On June 19, 2020, the SBA deposited a $4,000.00 EIDL advance into the account for Detroit's Red Light District 2.

91. On June 24, 2020, TOMA texted VALENTE a link to a realtor.com listing for 3865 Stonecrest Road in West Bloomfield, MI.

92. In response on June 25, 2020, VALENTE said "We can't afford it.[]"

93. Later that day, VALENTE told TOMA "I am going to assume that since you got uia [unemployment] and sba emergency money I don't need to give you money for a while correct."

94. On June 26, 2020, TOMA said to VALENTE "Please send me April and May bank statement. 1live oak bank is willing to do Sba loan to consolidate and working capital. It's a bank it's not a broker sent it to me as soon as possible please[.]" VALENTE responds "**Send me their info I will deal with them[.]"**

95. This belies VALENTE's statement that TOMA hacked his phone to obtain his business records to alter for the scheme. Rather, he sent them to her on purpose.

96. On June 29, 2020, TOMA asked VALENTE to "Please send me April,

May and Download June today bank statement. And P&L for 2019.I need them immediately I will not let anybody run your credit or do anything without you speaking to them but I have two people that I was speaking to that sent you information . Their direct lenders are not brokers with Live Oak Bank[.]"

97. In a follow-up text the same day, TOMA said "April statement May statement June to date and p and l 2019[.]"[2] VALENTE responded "**I sent you email."**

98. Again, this belies VALENTE's statement that TOMA hacked his phone to obtain his business records to alter for the scheme. Rather, he sent them to her on purpose.

99. On July 24, 2020, TOMA told VALENTE "Check your email I'm sending you a personal personal [sic] financial statement I need to fill out and send it back to me immediately please takes one second of your time[.]" VALENTE responded "This document cannot be done while I am at Crw too Many eyes[.]"

100. On July 28, 2020, TOMA told VALENTE "I need you to fill that form

[2] Your affiant, based on experience and review of other evidence, knows "P and L" to be a reference to profit and loss statements.

out that I sent you last week within the next hour and a half I need it signed and sent to me either you take it to the bathroom whatever you Gotta do I need it please[.]" VALENTE responded "Who is application for[?]". TOMA responded "SBA" and "Call me[.]"

101. This confirms that VALENTE and TOMA collaborated on her SBA applications—which runs both the EIDL and PPP programs—rather than VALENTE finding out after the fact.

102. Later the same day, TOMA asks VALENTE "did you sent me that paper for the sba [?]". TOMA then states "I shouldn't have to ask you for something for one week you're the one who needs it right." VALENTE says "no we will discuss this evening including IRS stunt."

103. On July 29, 2020, VALENTE texted TOMA "**you already have my tax returns which is all you need to do what paperwork you have to file[.]"**

104. On August 3, 2020, VALENTE asked TOMA "**What is happening with the ppp loans[?]".** TOMA responds "working on it[.]" VALENTE asks "And what's the status[?]" TOMA responds "When I know you will know[.]" VALENTE responds "**We are running out of time[.]"**

105. This, again, belies VALENTE's claims that he did not know about the PPP applications until after the fact. Rather, he knew, collaborated, and wanted

his wife to apply. Recall also that VALENTE personally told investigators that TOMA's companies existed only on paper.

106. That same day, August 3, 2020, TOMA applied for two PPP loans through Cache Valley Bank. On behalf of Detroits Red Light District 2 LLC, TOMA claimed average monthly payroll of $168,412.00, and 24 employees. On behalf of DF Worldwide, TOMA claimed average monthly payroll of $106,669.00, and 15 employees.

107. On August 14, TOMA applied for another PPP loan through Newtek AB for Building Detroit Group LLC, stating the average payroll as $246,733.00 and claiming 37 employees.

108. On August 13, 2020, TOMA texted VALENTE an SBA approval pdf and said "Call me. Should have money for this one in account by Monday."

109. On August 15, 2020, VALENTE texted TOMA: **Well Done[.]"**

110. Over the next year, VALENTE and TOMA texted frequently about use of the PPP funds.

111. On March 5, 2021, VALENTE texted TOMA ""Need to get our Cash flow in order. The ppp money will not last long." This is a full year before 2022, when VALENTE claims that he discovered the PPP funds.

CONCLUSION

112. Based on the forgoing, there is probable cause to believe that PETER VALENTE and ANGELA TOMA have conspired to commit wire fraud (18 U.S.C. § 1343), in violation of 18 U.S.C. § 1349, through their scheme to obtain PPP and EIDL benefits by means of false and fraudulent pretenses and representations. In addition, there is probable cause to believe that PETER VALENTE obstructed justice, in violation of 18 U.S.C. § 1503.

Respectfully submitted,

Victor VanMeerbeeck
Special Agent, HSI

Sworn to before me and signed in my
presence and/or by reliable electronic means.

HON. Kimberly G. Altman
United States Magistrate Judge

January 5, 2026