UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA	)	**INFORMATION NO.** 4:22cr-67
	)	
v.	)	**18 U.S.C. § 1349**
	)	**Conspiracy to Commit Wire Fraud**
MATTHEW PATSCHES	)	

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
Conspiracy to Commit Wire Fraud
18 U.S.C. § 1349

1. Beginning in or around April 2021 and continuing through in or around June 2021, within the Southern District of Georgia, Western District of Texas, and elsewhere, the defendant,

MATTHEW PATSCHES,

did knowingly and willfully combine, conspire, confederate, and agree with Coconspirator 1 ("CC-1") to devise or intend to devise a scheme or artifice to defraud, and for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, and to transmit or cause to be transmitted by wire communication in interstate commerce any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, in violation of 18 U.S.C. § 1343, the conspiracy to commit such offense being in violation of 18 U.S.C. § 1349.

2. The object of the conspiracy was for Defendant and CC-1 to unjustly enrich themselves by making false statements in loan applications electronically submitted to financial institutions through the Payroll Protection Program (PPP) to

unlawfully induce the financial institutions to dispense money and funds to Defendant to which he was not entitled, and Defendant, in turn, would pay a portion of the ill-gotten funds to CC-1 as a kickback.

3. In furtherance of this scheme, and to effect the objects thereof, the following acts were committed in furtherance of the conspiracy:

a. It was part of the conspiracy that in or about April 2021, Defendant and CC-1 utilized cellular devices, email, and the internet to create a fraudulent PPP application.

b. Defendant sent his personal identifying information to CC-1, who in turn, used the internet to create a fraudulent PPP bank loan application.

c. In particular, the conspirators caused to be submitted through interstate wire a PPP bank loan application with Fountainhead SBF LLC in Defendant's name that falsely represented Defendant had a business called "Matt's personal training" established on January 1, 2019, and that such business had $59,670 in gross income for tax year 2020, when in truth and fact, as Defendant and CC-1 both knew, Defendant had no such business.

d. In support of the fraudulent application, CC-1 caused to be submitted a false and fraudulent IRS Form Schedule C.

e. Thereafter, in or around June 2021, CC-1 caused to be submitted a second draw PPP application through Capital Plus financial institution that made false claims similar to those in the first draw application.

4. In reliance on false representations made in the PPP applications, Fountainhead SBF LLC, by means of wire communication, deposited $12,431 into Defendant's bank account on or around May 4, 2021, and Capital Plus deposited $12,431 into Defendant's bank account on or around June 28, 2021.

5. In exchange for CC-1 completing fraudulent PPP loan applications, Defendant agreed to pay and did pay CC-1 $3,500, which was transmitted by wire.

All in violation of Title 18, United States Code, Section 1349.

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