United States Courts
Southern District of Texas
FILED
September 18, 2025
Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
vs.	§	**CRIMINAL NO. 4:24-CR-302-2-S**
	§	
(2) TRENIKIA LASHAE BANKS,	§	
	§	
Defendant.	§	

SUPERSEDING CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
(Conspiracy, 18 U.S.C. § 371)

A. INTRODUCTION

At times material to this Information:

1. Defendant TRENIKIA LASHAE BANKS and others known and unknown to the United States Attorney conspired together, and with intent to defraud, participated in a scheme and artifice to defraud the Small Business Administration (SBA) and Cache Valley Bank.

2. BANKS was a resident of Houston, Texas, and was affiliated with the following business entities:

a. The Exclusive Estates LLC was registered as a Domestic Limited Liability Company with the Texas Secretary of State on or about September 25, 2018. BANKS was listed as the initial registered agent and one of two governing members. The Exclusive Estates LLC was in tax forfeiture status between approximately February 28, 2020, and February 19, 2021.

b. Solid LLC was registered as a Domestic Limited Liability Company with the Texas Secretary of State on or about January 16, 2020. BANKS was listed as the original registered agent and governing member.

c. Impressionable Memories LLC was registered as a Domestic Limited Liability Company with the Texas Secretary of State on or about May 27, 2021. BANKS was listed as the initial registered agent and governing member. On or about March 10, 2023, the Texas Secretary of State entered a tax forfeiture on Impressionable Memories.

3. Cache Valley Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

4. According to the Texas Workforce Commission, there were no wages associated with The Exclusive Estates LLC, Solid LLC, or Impressionable Memories LLC between at least January 1, 2019, and December 31, 2022.

B. THE PAYCHECK PROTECTION PROGRAM

5. The United States Small Business Administration ("SBA") was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses. The mission of the SBA was to maintain and strengthen the nation's economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters.

6. On or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security ("CARES") Act was enacted to provide emergency financial assistance to the millions of Americans suffering adverse economic effects caused by the COVID-19 pandemic. The CARES Act established several new temporary programs and provided for expansion of others, including programs created and/or administered by the SBA.

7. 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"). The PPP provided for government-backed loans designed to incentivize small businesses to keep their workers on the payroll by providing funds for up to 8 weeks of estimated payroll costs, including benefits.

8. To obtain a PPP loan, a qualifying business was required to submit a PPP loan application signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application, the applicant (through its authorized representative) was required to state, among other things: (a) its average monthly payroll expenses; and (b) its number of employees. These figures were used to calculate the amount of money the small business was eligible to receive under the PPP. In addition, the applicant was required to provide documentation showing its payroll expenses. The applicant was also required to certify that the business was in operation on February 15, 2020, and had employees or paid independent contractors.

9. A business's PPP loan application was received and processed, in the first instance, by a participating lender. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies, which were 100% guaranteed by the SBA.

10. PPP loan proceeds were required to be used by the business on certain permissible expenses: payroll costs, interest on mortgages, rent, and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven if the business spent the loan proceeds on these expense items within a designated period of time after receiving the proceeds and used a certain amount of the PPP loan proceeds on payroll expenses.

C. THE CONSPIRACY

11. Beginning no later than in or about April 2020, and continuing through in or about September 2022, within the Southern District of Texas and elsewhere, Defendant,

TRENIKIA LASHAE BANKS,

did knowingly combine, conspire, confederate, and agree with co-conspirators known and unknown to commit the following offense against the United States:

> to knowingly devise and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343 (wire fraud).

D. MANNER AND MEANS OF THE CONSPIRACY

12. In furtherance of this conspiracy and to effect the objects thereof, the Defendant and other co-conspirators used the following manner and means, among others:

a. Co-conspirators would submit and cause to be submitted fraudulent PPP loan applications to induce lenders to approve loans to businesses that did not qualify to receive loans, or to induce lenders to approve loans in amounts above what the businesses were entitled to receive.

b. Some fraudulent PPP loan applications submitted by co-conspirators were for businesses with existing operations, employees, and payroll. On the applications, co-

conspirators would inflate the number of employees and monthly payroll of the businesses, to increase the loan amounts that the businesses would receive.

c. Some fraudulent PPP loan applications submitted by co-conspirators were for businesses with no existing operations, employees, and payroll. On the applications, co-conspirators would falsely represent that the businesses had employees and monthly payroll.

d. Co-conspirators would submit and cause to be submitted fraudulent documents to substantiate their false statements to lenders regarding operations, number of employees, and monthly payroll of businesses seeking PPP and EIDL loans. These documents would include, but are not limited to, fake IRS tax forms.

e. Co-conspirators used PPP loan funds in part to pay for unauthorized and non-business expenses, including but not limited to house payments, car payments, and kickback payments.

E. OVERT ACTS

13. On or about January 21, 2021, Person C texted BANKS an image file depicting a first draw PPP application for Impressionable Memories LLC. Person C texted: "121k is what on app so u know and u have 12 employees." BANKS responded with the email address: "Applications@CVB.com."

14. On or about January 21, 2021, Cache Valley Bank received a first draw PPP application for Impressionable Memories LLC. The application falsely represented that Impressionable Memories LLC had 12 employees and an average monthly payroll of tens of thousands of dollars. Submitted in support of the application was a fraudulent business tax return for Impressionable Memories LLC purportedly signed by tax preparer Person A.

15. Cache Valley Bank approved a first draw PPP loan to Impressionable Memories LLC in the amount of $121,250. Person C electronically signed the Promissory Note in the name of "Trenikia L. Banks" on or about February 25, 2021.

16. On or about February 26, 2021, Person C texted BANKS an image file depicting a portion of the Promissory Note for the first draw PPP loan to Impressionable Memories LLC.

17. BANKS asked: "What's that promise to pay tho?" Person C responded: "Don't worry bout that u don't have to pay back if paperwork is put in to be forgiven but if u don't then it's a 1 percent loan. I have papers to put in once that time comes up a year from now."

18. Cache Valley Bank disbursed the first draw PPP loan funds for Impressionable Memories LLC into Capital One Bank Account x0546 (BANKS dba Impressionable Memories) on or about March 1, 2021. On or about March 2, 2021, BANKS used the loan proceeds to purchase a $48,500 cashier's check made payable to "ADMC Ent." On or about March 2, 2021, the $48,500 cashier's check from BANKS was deposited into Allegiance Bank Account x1389 (ADMC), a bank account belonging to Person C.

All in violation of Title 18, United States Code, Section 371.

NICHOLAS J. GANJEI
United States Attorney

By: _____

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