

Department of Justice
U.S. Attorney's Office
Southern District of New York

FOR IMMEDIATE RELEASE
Wednesday, December 8, 2021

Recidivist Fraudster And Co-Conspirator Charged In Covid-19 Relief Loan, Identity Theft, And Money Laundering Scheme

Damian Williams, the United States Attorney for the Southern District of New York, and Keith A. Bonanno, Special Agent in Charge of the Department of Justice Office of the Inspector General (“DOJ OIG”) Cyber Investigations Office, announced today that an Indictment was filed in Manhattan federal court charging ADEDAYO ILORI and CHRIS RECAMIER for a fraudulent scheme to obtain more than \$7 million in Government-guaranteed loans designed to provide relief to small businesses during the COVID-19 pandemic. In connection with loan applications for relief available from the Paycheck Protection Program (“PPP”) and the Economic Injury Disaster Loan (“EIDL”) Program, ILORI and RECAMIER falsely represented to the Small Business Administration (“SBA”) and private lenders that they operated a number of companies, used stolen identities, and submitted falsified tax documents. RECAMIER and ILORI are both in custody.

U.S. Attorney Damian Williams said: “As alleged, Adedayo Ilori has made quite a habit of committing loan fraud. While previously facing similar charges in a separate case involving loan and identity fraud – to which Ilori pled guilty in April of this year – he is once again alleged to have committed similar conduct to defraud the SBA and private lenders in an attempt to steal much-needed COVID-19 financial relief. Ilori and his co-defendant, Chris Recaimer, now face criminal charges for attempting to steal over \$7 million in funds specifically designated to assist small businesses struggling with financial hardships from the worldwide COVID pandemic.”

DOJ OIG Special Agent in Charge Keith A. Bonanno said: “Ilori and Recamier allegedly stole the identities of individuals and companies and fraudulently obtained over a million dollars intended to help those suffering from hardship due to the COVID-19 pandemic. The Pandemic Response Accountability Committee COVID-19 Task Force is dedicated to rooting out these kinds of schemes and bringing the fraudsters to justice.”

According to the Indictment unsealed today in Manhattan federal court, the Complaint filed against RECAMIER on October 8, 2021, and filings made on public court dockets:[\[1\]](#)

The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act is a federal law enacted on March 29, 2020, designed to provide emergency financial assistance to the millions of Americans who are suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of hundreds of billions of dollars in forgivable loans to small businesses for job retention and certain other expenses through the SBA’s PPP. Pursuant to the CARES Act, the amount of PPP funds a business is eligible to receive is determined by the number of employees employed by the business and its average payroll costs. Businesses applying for a PPP loan must provide documentation to confirm that they have previously paid employees the compensation represented in the loan application. The CARES Act also expanded the separate EIDL Program, which provides small businesses with low-interest loans of up to \$2 million that can provide vital economic support to help overcome the temporary loss of revenue they are experiencing due to COVID-19. To qualify for an EIDL loan under the CARES Act, the applicant must have suffered “substantial economic injury” from COVID-19.

From at least in or about August 2020 through at least in or about October 2021, ILORI and RECAMIER, prepared to apply, and applied for numerous PPP and EIDL loans. In applying for these loans, ILORI and RECAMIER claimed stolen identities of third parties. In the role of these assumed identities, ILORI and RECAMIER claimed full control of a number of companies, which they purported, cumulatively, employed more than 200 people and paid more than \$3.2 million in monthly wages. In reality, they did not operate these companies. In submitting these applications ILORI and RECAMIER, among other things, submitted falsified tax documents that were never actually filed with the Internal Revenue Service.

ILORI and RECAMIER attempted to obtain over approximately \$7.5 million in PPP and EIDL program funds, and successfully obtained more than \$1 million as a result of their scheme. ILORI and RECAMIER transferred the majority of these funds toward (1) cryptocurrency investments, (2) the purchase of stocks, (3) cash withdrawals, and (4) personal expenses. The investment accounts were also opened by ILORI and RECAMIER in the stolen identities of third parties.

ILORI committed these offenses while facing charges in a separate case filed in the Southern District of New York involving fraud, identity theft, and money laundering in *United States v. Ilori*, 20 Cr 378 (LJL). As part of that case, ILORI pled guilty on April 8, 2021, to conspiracy to commit mail and wire fraud and conspiracy to commit money laundering, and is currently awaiting sentencing.

* * *

ADEDAYO ILORI, 42, of Brooklyn, New York, and CHRIS RECAMIER, 58, of New York, New York, are charged with (1) major fraud against the United States, which carries a maximum sentence of 10 years in prison; (2) conspiracy to commit wire and bank fraud, which carries a maximum sentence of 30 years in prison; (3) wire fraud, which carries a maximum sentence of 30 years in prison; (4) bank fraud, which carries a maximum sentence of 30 years in prison; (5) aggravated identity theft, which carries a mandatory consecutive sentence of two years in prison; and (6) conspiracy to commit money laundering, which carries a maximum sentence of 20 years in prison. The maximum potential sentences in this case are prescribed by Congress and are provided here for informational purposes only, as any sentencing of the defendants will be determined by the judge.

Mr. Williams praised the investigative work of the DOJ OIG, which conducted the investigation on behalf of the [Pandemic Response Accountability Committee](#) (PRAC) COVID-19 Task Force.^[2] Mr. Williams also thanked the U.S. Secret Service, the Drug Enforcement Administration, the New York City Police Department, the Federal Bureau of Investigation, and the Federal Aviation Administration for their assistance in this investigation.

This case is being handled by the Office's Complex Frauds and Cybercrime Unit. Assistant U.S. Attorney Daniel G. Nessim is in charge of the prosecution.

The charges contained in the Indictment are merely accusations, and the defendants are presumed innocent unless and until proven guilty.

[1] As the introductory phrase signifies, the entirety of the text of the Indictment and Complaint, and the description of the Indictment and Complaint set forth herein, constitute only allegations, and every fact described should be treated as an allegation.

[2] Created by the CARES Act, the PRAC serves the American public by promoting transparency and facilitating coordinated oversight of the federal government's COVID-19 pandemic response. The PRAC's 22 member Inspectors General identify major risks that cross program and agency boundaries to detect fraud, waste, abuse, and mismanagement in the more than \$5 trillion in COVID-19 spending.