FILED
2026 Nov-19 AM 09:09
U.S. DISTRICT COURT
N.D. OF ALABAMA

PWW/BAJ: November 2026
BHM GJ# 14

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

UNITED STATES OF AMERICA	**)**
	)
v.	**)**
	)
PATRICK LORN SELLERS	**)**

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

1. At all times relevant to the Indictment, the defendant, **PATRICK LORN SELLERS**, was a resident of Jefferson County, Alabama and the pastor of a Missionary Baptist church in Birmingham, Alabama.

2. Since November 2022, **SELLERS** has also served as the State Representative for Alabama House District 57, a seat based in western Jefferson County, Alabama.

3. From in or about November 2018 through in or about November 2023, **SELLERS** was also the Chief of Staff to Individual #1, the President of the Alabama State Missionary Baptist Convention, Inc. ("ASMBC").

4. From in or about July 2020 through in or about May 2021, **SELLERS** fraudulently solicited and obtained more than $240,000 in grants and loans from the

United States government, the State of Alabama government, and an Alabama-based non-profit ("Non-Profit #1"), all of which were intended to provide relief from the COVID-19 pandemic, but which **SELLERS** used for his own personal benefit.

5. More specifically, **SELLERS** purported to solicit the grants and loans on behalf of and for the benefit of a pair of non-profit entities (specifically, ASMBC 501(c)(3) and Project Zion, Inc.), as well as a fictitious business entity tied to himself (Sellers Lawn Care).

6. **SELLERS** did not have the authority to solicit grants and loans on behalf of ASMBC and did so without the knowledge of ASMBC's president and executive board.

7. Moreover, rather than devote the grant and loan proceeds to the benefit of the non-profit entities under whose guise he applied for them, **SELLERS** spent a large portion of the proceeds on goods and services for himself, including personal credit card payments, personal mortgage payments, personal loan payments, personal water bill payments, and even his daughters' college tuition payments.

The Coronavirus Aid, Relief, and Economic Security Act

8. The United States Small Business Administration ("SBA") is an executive branch agency of the United States government that provides support to entrepreneurs and small businesses.

9. In general, the SBA enables and provides for loans through banks, credit unions, and other lenders. These loans have government-backed guarantees. In addition to traditional SBA funding programs, the Coronavirus Aid, Relief, and Economic Security ("CARES") Act established several new temporary programs and provided for the expansion of others to address the COVID-19 pandemic, which was declared a nationwide disaster by the President of the United States in March 2020.

The Economic Injury Disaster Loan Program

10. One program that was expanded by the CARES Act was the Economic Injury Disaster Loan ("EIDL") program. The EIDL program was overseen by the SBA and was designed to provide long-term, low-interest loans for small businesses affected by the COVID-19 pandemic.

11. To obtain an EIDL loan, a qualifying business was required to submit an application to the SBA and provide information about its operation, such as 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. The applicant was also required to certify that all of the information in the application was true and correct to the best of the applicant's knowledge.

12. EIDL loan applications were submitted directly to the SBA and processed by the SBA. Any funds issued under an EIDL loan were issued directly by the SBA.

13. The proceeds of an EIDL loan could only be used for certain specified purposes, namely working capital and normal operating expenses.

The Paycheck Protection Program

14. One of the new programs established by the CARES Act was the SBA Paycheck Protection Program ("PPP"), which was a loan program designed to provide a direct incentive for small businesses to keep their workers on the payroll.

15. The PPP application process required applicants to submit a Borrower Application Form through an SBA-approved financial entity. The application contained information as to the purpose of the loan, average monthly payroll, number of employees, and background of the business and its owner. Applicants were also required to submit documentation supporting their representations about the business. Those applying for PPP loans as sole proprietors or self-employed individuals would often include an IRS Form 1040 Schedule C ("Profit or Loss From Business") with their application as evidence of the profits and losses from the year prior to the COVID-19 pandemic, as well as to demonstrate that the business was a

going concern as of February 15, 2020, as required for eligibility for the PPP program.

16. Applicants were also required to make certain good-faith certifications and representations, including, but not limited to, that the business was in operation on February 15, 2020; that economic uncertainty had necessitated their loan requests for continued business operations; and that they intended to use the loan proceeds only for authorized purposes. Applicants were also required to certify that the information provided in the application and all supporting documentation was true and correct in all material respects and that they were aware that knowingly making a false statement to obtain the PPP loan was punishable under federal law.

17. The proceeds of a PPP loan could only be used for certain specified items, such as payroll costs, costs related to the continuation of group health care benefits, mortgage interest payments (but not mortgage prepayments or principal payments), rent payments, utility payments, interest payments on debt obligations that were incurred before February 15, 2020, or for refinancing certain specified SBA loans.

Alabama Non-Profit Organization COVID-19 Relief Grant Program & Revive Plus COVID-19 Relief Grant Program

18. The State of Alabama's Nonprofit Organization COVID-19 Relief Grant Program and Revive Plus COVID-19 Relief Grant Program were also funded by the CARES Act.

19. Both programs were aimed at assisting Alabama-based entities that had been impacted by the COVID-19 pandemic, with the Nonprofit Organization COVID-19 Relief Grant Program offering $15,000 grants to qualifying organizations and the Revive Plus COVID-19 Relief Grant Program offering $20,000 grants to qualifying organizations.

20. In order to obtain grants under the programs, applicants were required to submit a signed Certification and Assurance Form, in which the signatory made a number of certifications under penalty of perjury, including, but not limited to, that the signatory had the authority to obtain the grant on behalf of the applicant organization, as well as that the grant proceeds would only be used to reimburse the expenditures that the applicant organization had incurred in preventing, preparing for, and responding to the COVID-19 pandemic.

ASMBC 501(c)(3)

21. From in or about November 2010 through in or about November 2018, Individual #2 served as the President of ASMBC.

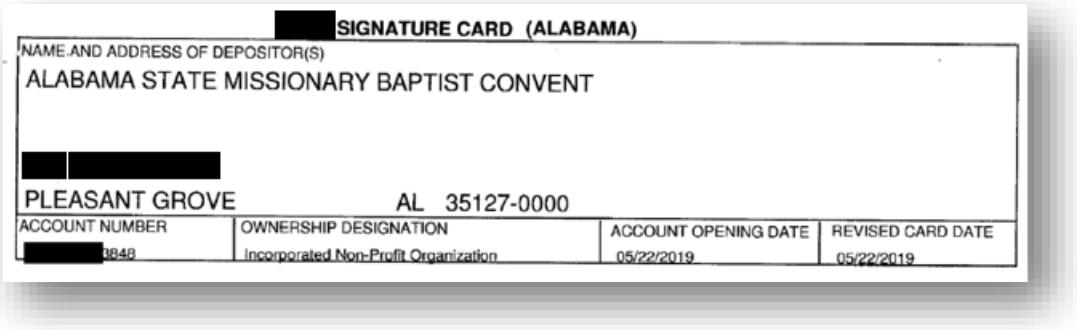
22. In or about 2013, Individual #2 established a non-profit entity – "ASMBC 501(c)(3)" – to provide financial support for ASMBC and its various initiatives.

23. In or about November 2018, Individual #1 was elected to succeed Individual #2 as the President of ASMBC.

24. After becoming Chief of Staff to Individual #1 in or about November 2018, **SELLERS** took steps to take control of ASMBC 501(c)(3).

25. For instance, on May 22, 2019, **SELLERS** opened a bank account ending in -3848 in the name of ASMBC 501(c)(3).

26. Notably, as reflected in the screenshot of the account's signature card below, **SELLERS** set the account's mailing address as his home address in Pleasant Grove, Alabama, rather than ASMBC's official mailing address in Selma, Alabama.



[redacted] SIGNATURE CARD (ALABAMA)

NAME AND ADDRESS OF DEPOSITOR(S)

ALABAMA STATE MISSIONARY BAPTIST CONVENT

[redacted]

PLEASANT GROVE AL 35127-0000

ACCOUNT NUMBER	OWNERSHIP DESIGNATION	ACCOUNT OPENING DATE	REVISED CARD DATE
[redacted]3848	Incorporated Non-Profit Organization	05/22/2019	05/22/2019

Please sign beside the Printed Name(s) only. If signature line does not have a Printed Name, then a signature is not required on that line.

[redacted]
SSN/TIN/EIN

ALABAMA STATE MISSIONARY BA
Printed Name
Patrick L. Sellers

Signature for Entity - Your Title

05/22/2019
DATE

27. Similarly, on October 31, 2019, **SELLERS** created an ASMBC 501(c)(3)-specific email address, asmbc501c3@[Email Account Provider #1].com.

28. Multiple details tie **SELLERS** to this email account, including that one of **SELLERS**' primary phone numbers – XXX-XXX-5370 – was set as the recovery phone number for the email account, as reflected in the screenshot below of the subscriber information for the email address obtained from Email Account Provider #1.

Subscriber Details

This information is provided for intended and authorized use only. Any use of this data for unauthorized purposes is strictly prohibited.

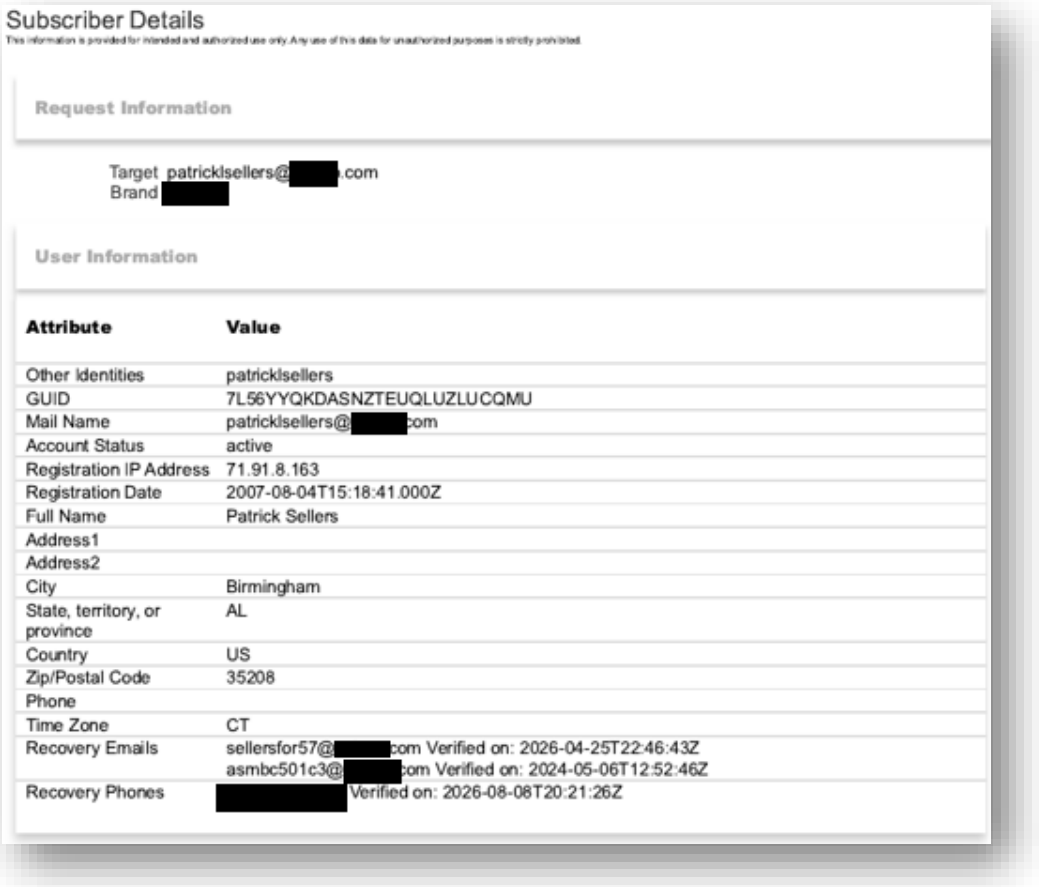
Request Information

Target asmbc501c3@[redacted]com
Brand [redacted]

User Information

Attribute	Value
Other Identities	asmbc501c3
GUID	DIPVYKRJNQWDLJCJEWBNM2632U
Mail Name	asmbc501c3@[redacted]com
Account Status	active
Registration IP Address	71.82.7.216
Registration Date	2019-10-31T15:42:45.000Z
Full Name	Alabama State Baptist Convention
Address1	
Address2	
City	
State, territory, or province	
Country	
Zip/Postal Code	
Phone	
Time Zone	
Recovery Emails	
Recovery Phones	[redacted]5370 Verified on: 2019-10-31T15:42:45Z

29. Moreover, asmbc501c3@[Email Account Provider #1].com was set as a recovery email (along with sellersfor57@[Email Account Provider #1].com) for **SELLERS**' primary personal email address, patricklsellers@[Email Account Provider #1].com, as reflected in the screenshot below of the subscriber information for that email address obtained from Email Account Provider #1.



Subscriber Details

This information is provided for intended and authorized use only. Any use of this data for unauthorized purposes is strictly prohibited.

Request Information

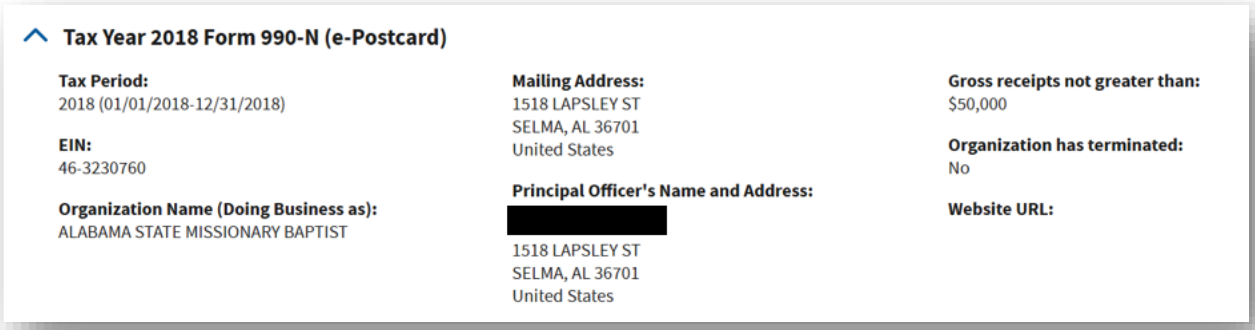
Target patricklsellers@[redacted].com
Brand [redacted]

User Information

Attribute	Value
Other Identities	patricklsellers
GUID	7L56YYQKDASNZTEUQLUZLUCQMU
Mail Name	patricklsellers@[redacted]com
Account Status	active
Registration IP Address	71.91.8.163
Registration Date	2007-08-04T15:18:41.000Z
Full Name	Patrick Sellers
Address1	
Address2	
City	Birmingham
State, territory, or province	AL
Country	US
Zip/Postal Code	35208
Phone	
Time Zone	CT
Recovery Emails	sellersfor57@[redacted]com Verified on: 2026-04-25T22:46:43Z asmbc501c3@[redacted]com Verified on: 2024-05-06T12:52:46Z
Recovery Phones	[redacted] Verified on: 2026-08-08T20:21:26Z

30. Finally, for Tax Year 2019, ASMBC 501(c)(3)'s mailing address with the IRS was changed from ASMBC's official mailing address in Selma, Alabama to

SELLERS' home address in Pleasant Grove, Alabama, as reflected in the screenshots below comparing the IRS Form 990-Ns from Tax Years 2018 and 2019.



Tax Year 2018 Form 990-N (e-Postcard)

Tax Period:
2018 (01/01/2018-12/31/2018)

EIN:
46-3230760

Organization Name (Doing Business as):
ALABAMA STATE MISSIONARY BAPTIST

Mailing Address:
1518 LAPSLEY ST
SELMA, AL 36701
United States

Principal Officer's Name and Address:
[redacted]
1518 LAPSLEY ST
SELMA, AL 36701
United States

Gross receipts not greater than:
$50,000

Organization has terminated:
No

Website URL:



Tax Year 2019 Form 990-N (e-Postcard)

Tax Period:
2019 (01/01/2019-12/31/2019)

EIN:
46-3230760

Organization Name (Doing Business as):
ALABAMA STATE MISSIONARY BAPTIST CONVENTION 501C3

Mailing Address:
[redacted]
Pleasant Grove, AL 35127
United States

Principal Officer's Name and Address:
Patrick Sellers
[redacted]
Pleasant Grove, AL 35127
United States

Gross receipts not greater than:
$50,000

Organization has terminated:
No

Website URL:

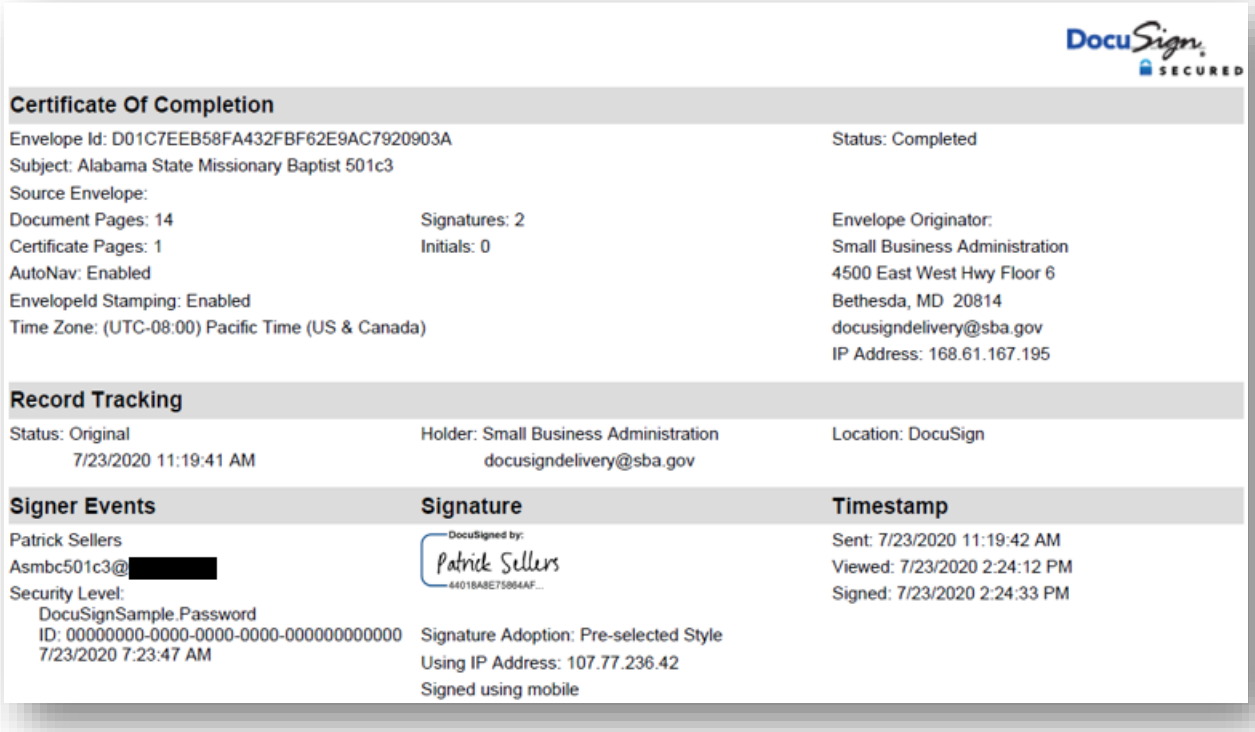
ASMBC 501(c)(3)'s EIDL Loan

31. In or about July 2020, having effectively taken control of the non-profit entity, **SELLERS** submitted an application to the SBA for an EIDL loan for ASMBC 501(c)(3).

32. **SELLERS** listed himself as the primary contact on the application and, in doing so, provided contact information details – specifically,

asmbc501c3@[Email Account Provider #1].com and XXX-XXX-5370 – that tie directly back to him, as discussed in paragraphs 28 and 29 above.

33. The application was officially executed via DocuSign using asmbc501c3@[Email Account Provider #1].com, as reflected in the screenshot below of the executed Certificate of Completion.



DocuSign SECURED

Certificate Of Completion

Envelope Id: D01C7EEB58FA432FBF62E9AC7920903A
Subject: Alabama State Missionary Baptist 501c3
Source Envelope:
Document Pages: 14 | Signatures: 2
Certificate Pages: 1 | Initials: 0
AutoNav: Enabled
EnvelopeId Stamping: Enabled
Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Status: Completed

Envelope Originator:
Small Business Administration
4500 East West Hwy Floor 6
Bethesda, MD 20814
docusigndelivery@sba.gov
IP Address: 168.61.167.195

Record Tracking

Status: Original
7/23/2020 11:19:41 AM

Holder: Small Business Administration
docusigndelivery@sba.gov

Location: DocuSign

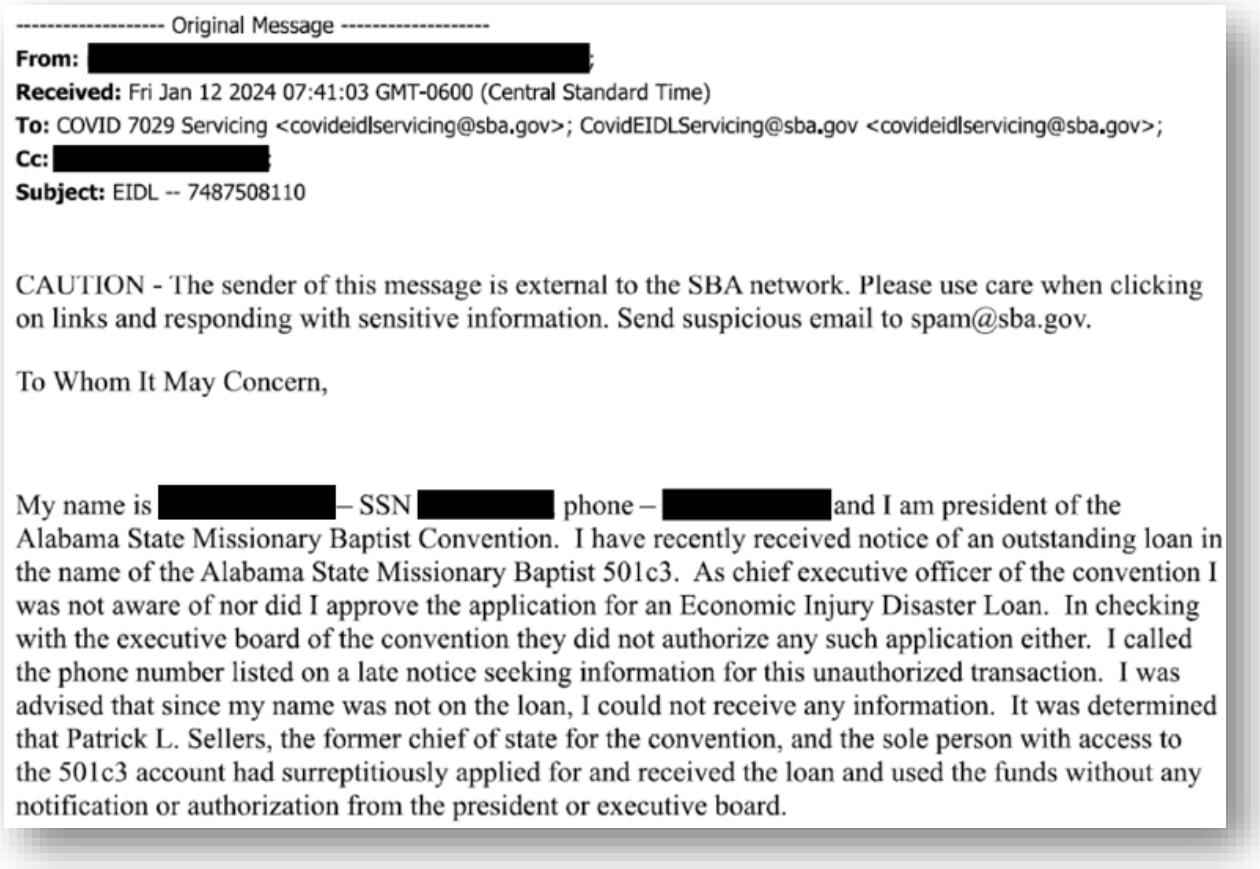
Signer Events	Signature	Timestamp
Patrick Sellers Asmbc501c3@[redacted] Security Level: DocuSignSample.Password ID: 00000000-0000-0000-0000-000000000000 7/23/2020 7:23:47 AM	DocuSigned by: Patrick Sellers 44018A8E75864AF... Signature Adoption: Pre-selected Style Using IP Address: 107.77.236.42 Signed using mobile	Sent: 7/23/2020 11:19:42 AM Viewed: 7/23/2020 2:24:12 PM Signed: 7/23/2020 2:24:33 PM

34. The application submitted by **SELLERS** included materially false and fraudulent representations.

35. **SELLERS** falsely and fraudulently represented that he was authorized by ASMBC to apply for the EIDL loan, certifying, "Under penalty of perjury of the

United States of America, I hereby certify that I am authorized to apply for and obtain a disaster loan on behalf of Borrower, in connection with the effects of the COVID-10 emergency."

36. To the contrary, **SELLERS** did not have the authority to apply for and obtain an EIDL loan on behalf of ASMBC or its affiliated non-profit entity. In fact, after Individual #1 learned that **SELLERS** had applied for and obtained an EIDL loan on behalf of ASMBC, he contacted the SBA by email dated January 12, 2024 (as reflected in the screenshot below), making clear that "[a]s chief executive officer of the convention I was not aware of nor did I approve the application for an Economic Injury Disaster Loan" and "[i]n checking with the executive board of the convention they did not authorize any such application either." Rather, "[i]t was determined that Patrick L. Sellers, the former chief of sta[ff] for the convention, and the sole person with access to the 501c3 account had surreptitiously applied for and received the loan and used the funds without any notification or authorization from the president or executive board."



---------- Original Message ----------
From: [redacted]
Received: Fri Jan 12 2024 07:41:03 GMT-0600 (Central Standard Time)
To: COVID 7029 Servicing <covideidlservicing@sba.gov>; CovidEIDLServicing@sba.gov <covideidlservicing@sba.gov>;
Cc: [redacted]
Subject: EIDL -- 7487508110

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

To Whom It May Concern,

My name is [redacted] – SSN [redacted] phone – [redacted] and I am president of the Alabama State Missionary Baptist Convention. I have recently received notice of an outstanding loan in the name of the Alabama State Missionary Baptist 501c3. As chief executive officer of the convention I was not aware of nor did I approve the application for an Economic Injury Disaster Loan. In checking with the executive board of the convention they did not authorize any such application either. I called the phone number listed on a late notice seeking information for this unauthorized transaction. I was advised that since my name was not on the loan, I could not receive any information. It was determined that Patrick L. Sellers, the former chief of state for the convention, and the sole person with access to the 501c3 account had surreptitiously applied for and received the loan and used the funds without any notification or authorization from the president or executive board.

37. **SELLERS** also falsely and fraudulently represented that ASMBC 501(c)(3) had five employees, even though that entity has never had any reported employees, as confirmed by the Alabama Department of Labor.

38. **SELLERS** further falsely and fraudulently represented that "Borrower will use all the proceeds of this Loan solely as working capital to alleviate economic injury caused by [the COVID-19] disaster . . ."

39. To the contrary, after the ASMBC 501(c)(3) bank account ending in -3848 received $5,000 in EIDL funding from the SBA on July 8, 2020 and $15,000

in EIDL funding from the SBA on July 27, 2020, **SELLERS** used those loan proceeds for various personal purchases.

40. For instance, in early July 2020, funds from the ASMBC 501(c)(3) bank account ending in -3848 were used to make a $2,940.85 payment to Credit Card Provider #1.

41. According to records obtained from Credit Card Provider #1, that payments was made toward a credit card account belonging to **SELLERS**.

42. In fact, between July 2020 and April 2021, funds from the ASMBC 501(c)(3) bank account ending in -3848 were used to make $11,286.75 in payments on **SELLERS**' account with Credit Card Provider #1.

43. Similarly, in early August 2020, funds from the ASMBC 501(c)(3) bank account ending in -3848 were used to make payments totaling approximately $1,000 to Water Utility #1.

44. According to records obtained from Water Utility #1, those payments were directed to an account in **SELLERS**' mother's name and connected to **SELLERS**' home address.

45. Finally, **SELLERS** falsely and fraudulently represented that "[a]ll representations in the Borrower's Loan application (including all supplementary

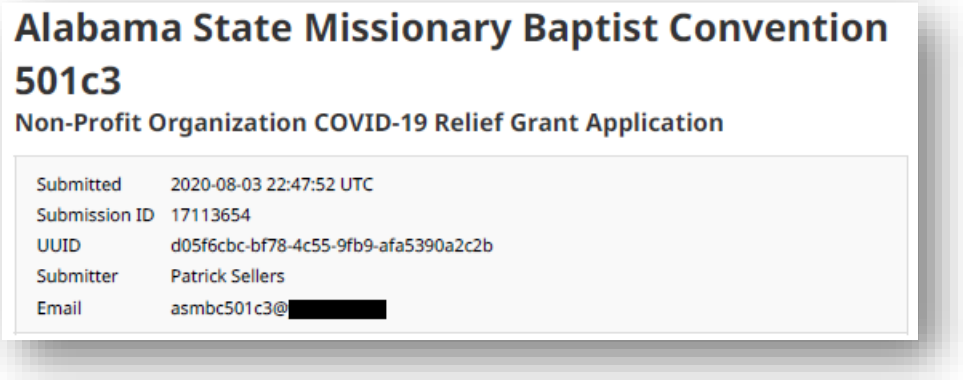
submissions) are true, correct, and complete and are offered to induce SBA to make this Loan."

ASMBC 501(c)(3)'s State of Alabama Non-Profit COVID-19 Relief Grant

46. In or about September 2020, **SELLERS** submitted an application to the State of Alabama for a grant for ASMBC 501(c)(3) from Alabama's Nonprofit Organization COVID-19 Relief Grant Program.

47. **SELLERS** listed himself as the primary contact on the application and, in doing so, provided contact information details – specifically, patricklsellers@[Email Account Provider #1].com and XXX-XXX-5370 – that tie directly back to him, as discussed in paragraphs 28 and 29 above.

48. The application was officially submitted through the State of Alabama Submissions Portal using asmbc501c3@[Email Account Provider #1].com, as reflected in the screenshot below of the Submissions Portal.



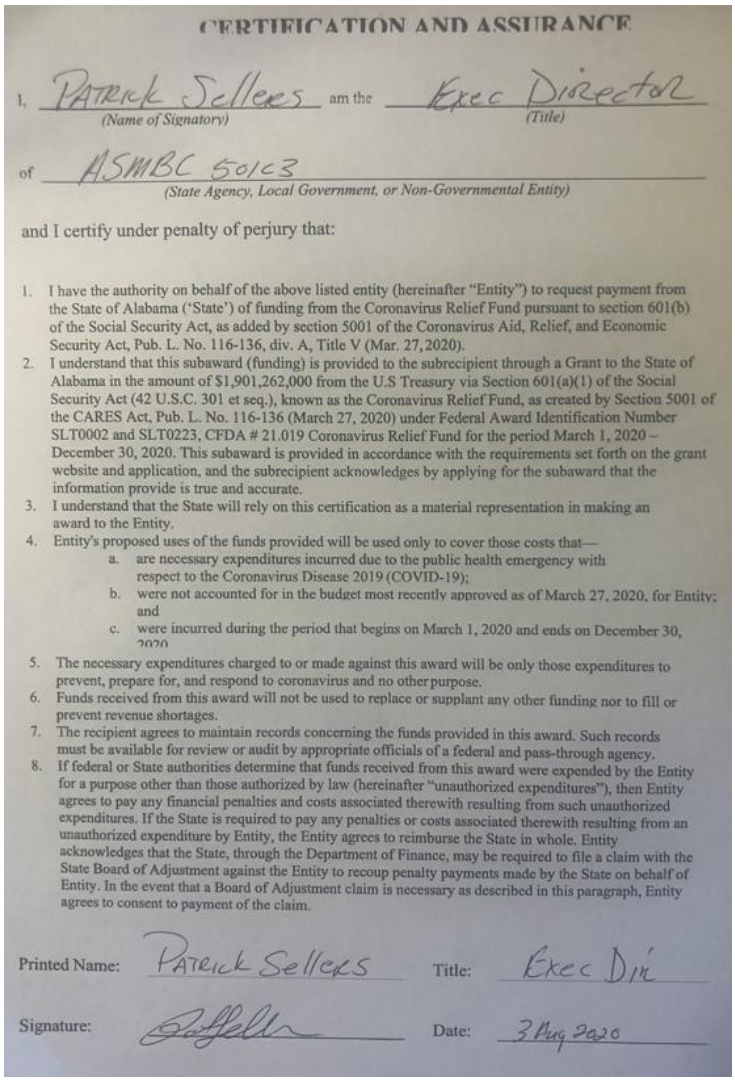
Alabama State Missionary Baptist Convention 501c3

Non-Profit Organization COVID-19 Relief Grant Application

Submitted	2020-08-03 22:47:52 UTC
Submission ID	17113654
UUID	d05f6cbc-bf78-4c55-9fb9-afa5390a2c2b
Submitter	Patrick Sellers
Email	asmbc501c3@[redacted]

49. The application submitted by **SELLERS** included materially false and fraudulent representations.

50. In particular, as part of the application process, **SELLERS** submitted a signed Certification and Assurance form, as reflected in the screenshot below.



CERTIFICATION AND ASSURANCE

I, Patrick Sellers (Name of Signatory) am the Exec Director (Title)

of ASMBC 501c3 (State Agency, Local Government, or Non-Governmental Entity)

and I certify under penalty of perjury that:

1. I have the authority on behalf of the above listed entity (hereinafter "Entity") to request payment from the State of Alabama ('State') of funding from the Coronavirus Relief Fund pursuant to section 601(b) of the Social Security Act, as added by section 5001 of the Coronavirus Aid, Relief, and Economic Security Act, Pub. L. No. 116-136, div. A, Title V (Mar. 27, 2020).
2. I understand that this subaward (funding) is provided to the subrecipient through a Grant to the State of Alabama in the amount of $1,901,262,000 from the U.S Treasury via Section 601(a)(1) of the Social Security Act (42 U.S.C. 301 et seq.), known as the Coronavirus Relief Fund, as created by Section 5001 of the CARES Act, Pub. L. No. 116-136 (March 27, 2020) under Federal Award Identification Number SLT0002 and SLT0223, CFDA # 21.019 Coronavirus Relief Fund for the period March 1, 2020 – December 30, 2020. This subaward is provided in accordance with the requirements set forth on the grant website and application, and the subrecipient acknowledges by applying for the subaward that the information provide is true and accurate.
3. I understand that the State will rely on this certification as a material representation in making an award to the Entity.
4. Entity's proposed uses of the funds provided will be used only to cover those costs that—
   a. are necessary expenditures incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19);
   b. were not accounted for in the budget most recently approved as of March 27, 2020, for Entity; and
   c. were incurred during the period that begins on March 1, 2020 and ends on December 30, 2020
5. The necessary expenditures charged to or made against this award will be only those expenditures to prevent, prepare for, and respond to coronavirus and no other purpose.
6. Funds received from this award will not be used to replace or supplant any other funding nor to fill or prevent revenue shortages.
7. The recipient agrees to maintain records concerning the funds provided in this award. Such records must be available for review or audit by appropriate officials of a federal and pass-through agency.
8. If federal or State authorities determine that funds received from this award were expended by the Entity for a purpose other than those authorized by law (hereinafter "unauthorized expenditures"), then Entity agrees to pay any financial penalties and costs associated therewith resulting from such unauthorized expenditures. If the State is required to pay any penalties or costs associated therewith resulting from an unauthorized expenditure by Entity, the Entity agrees to reimburse the State in whole. Entity acknowledges that the State, through the Department of Finance, may be required to file a claim with the State Board of Adjustment against the Entity to recoup penalty payments made by the State on behalf of Entity. In the event that a Board of Adjustment claim is necessary as described in this paragraph, Entity agrees to consent to payment of the claim.

Printed Name: Patrick Sellers Title: Exec Dir

Signature: [signature] Date: 3 Aug 2020

51. In the Certification and Assurance form, **SELLERS** falsely and fraudulently represented under penalty of perjury that he had "the authority on behalf

of [ASMBC 501(c)(3)] to request payment from the State of Alabama ('State') of funding from the Coronavirus Relief Fund," even though he did not have the authority to seek grants on behalf of ASMBC.

52. **SELLERS** also falsely and fraudulently represented that the "necessary expenditures charged to or made against this award will be only those expenditures to prevent, prepare for, and respond to coronavirus and no other purpose."

53. Similarly, in response to a question in the application ("What are your needs and how do you plan to use the funds received from the grant?"), **SELLERS** falsely and fraudulently represented, "Utilize Funds to ensure that our staff can continue to receive their compensations."

54. To the contrary, after the ASMBC 501(c)(3) bank account ending in -3848 received $15,000 in funding from the State of Alabama on September 23, 2020, **SELLERS** used those grant proceeds for various personal purchases.

55. For instance, in October 2020, funds from the ASMBC 501(c)(3) bank account ending in -3848 were used to make $26,165.55 in payments to Automobile Financing Provider #1.

56. According to records obtained from Automobile Financing Provider #1, those payments accounted for virtually all of the payments made towards an automobile loan in Sellers' name.

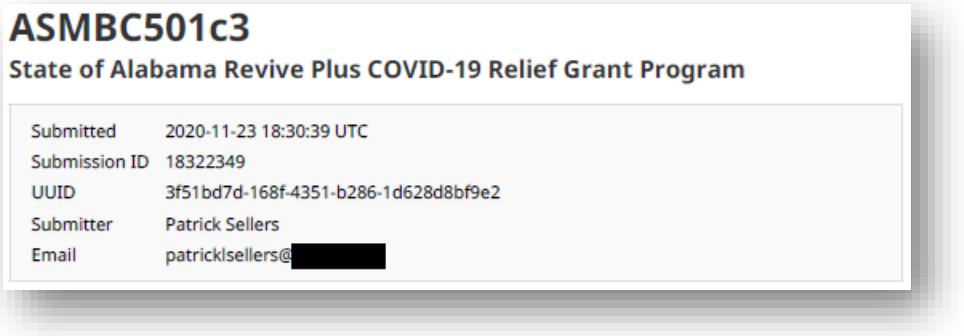
57. Finally, elsewhere in the application, **SELLERS** falsely and fraudulently represented that ASMBC 501(c)(3) had not "received an SBA-backed Paycheck Protection Program loan or an Economic Injury Disaster Loan Emergency Advance," even though he had already obtained an EIDL loan for ASMBC 501(c)(3), as detailed above.

ASMBC 501(c)(3)'s State of Alabama Revive Plus COVID-19 Relief Grant

58. In or about November 2020, **SELLERS** submitted an application to the State of Alabama for a grant for ASMBC 501(c)(3) from Alabama's Revive Plus COVID-19 Relief Grant Program.

59. **SELLERS** listed himself as the primary contact on the application and, in doing so, provided contact information details – specifically, patricklsellers@[Email Account Provider #1].com and XXX-XXX-5370 – that tie directly back to him, as discussed in paragraphs 28 and 29 above.

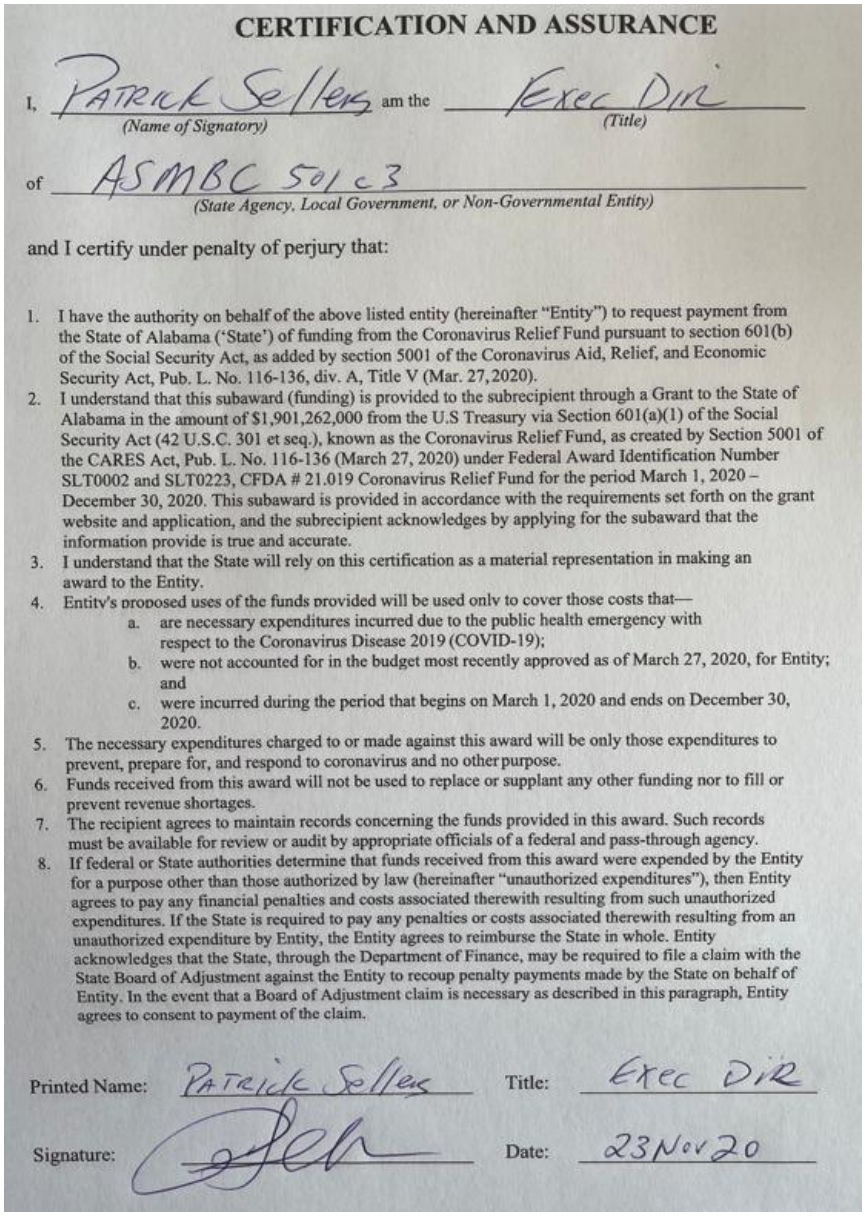
60. The application was officially submitted through the State of Alabama Submissions Portal using patricklsellers@[Email Account Provider #1].com, as reflected in the screenshot below of the Submissions Portal.



61. The application submitted by **SELLERS** included materially false and fraudulent representations.

62. As an initial matter, **SELLERS** falsely and fraudulently represented that ASMBC 501(c)(3) had ten employees, even though that entity has never had any reported employees, as previously discussed in paragraph 37 above.

63. Additionally, as part of the application process, **SELLERS** submitted a signed Certification and Assurance form, as reflected in the screenshot below.



CERTIFICATION AND ASSURANCE

I, Patrick Sellers (Name of Signatory) am the Exec Dir (Title)

of ASMBC 501c3 (State Agency, Local Government, or Non-Governmental Entity)

and I certify under penalty of perjury that:

1. I have the authority on behalf of the above listed entity (hereinafter "Entity") to request payment from the State of Alabama ('State') of funding from the Coronavirus Relief Fund pursuant to section 601(b) of the Social Security Act, as added by section 5001 of the Coronavirus Aid, Relief, and Economic Security Act, Pub. L. No. 116-136, div. A, Title V (Mar. 27, 2020).
2. I understand that this subaward (funding) is provided to the subrecipient through a Grant to the State of Alabama in the amount of $1,901,262,000 from the U.S Treasury via Section 601(a)(1) of the Social Security Act (42 U.S.C. 301 et seq.), known as the Coronavirus Relief Fund, as created by Section 5001 of the CARES Act, Pub. L. No. 116-136 (March 27, 2020) under Federal Award Identification Number SLT0002 and SLT0223, CFDA # 21.019 Coronavirus Relief Fund for the period March 1, 2020 – December 30, 2020. This subaward is provided in accordance with the requirements set forth on the grant website and application, and the subrecipient acknowledges by applying for the subaward that the information provide is true and accurate.
3. I understand that the State will rely on this certification as a material representation in making an award to the Entity.
4. Entity's proposed uses of the funds provided will be used only to cover those costs that—
   a. are necessary expenditures incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19);
   b. were not accounted for in the budget most recently approved as of March 27, 2020, for Entity; and
   c. were incurred during the period that begins on March 1, 2020 and ends on December 30, 2020.
5. The necessary expenditures charged to or made against this award will be only those expenditures to prevent, prepare for, and respond to coronavirus and no other purpose.
6. Funds received from this award will not be used to replace or supplant any other funding nor to fill or prevent revenue shortages.
7. The recipient agrees to maintain records concerning the funds provided in this award. Such records must be available for review or audit by appropriate officials of a federal and pass-through agency.
8. If federal or State authorities determine that funds received from this award were expended by the Entity for a purpose other than those authorized by law (hereinafter "unauthorized expenditures"), then Entity agrees to pay any financial penalties and costs associated therewith resulting from such unauthorized expenditures. If the State is required to pay any penalties or costs associated therewith resulting from an unauthorized expenditure by Entity, the Entity agrees to reimburse the State in whole. Entity acknowledges that the State, through the Department of Finance, may be required to file a claim with the State Board of Adjustment against the Entity to recoup penalty payments made by the State on behalf of Entity. In the event that a Board of Adjustment claim is necessary as described in this paragraph, Entity agrees to consent to payment of the claim.

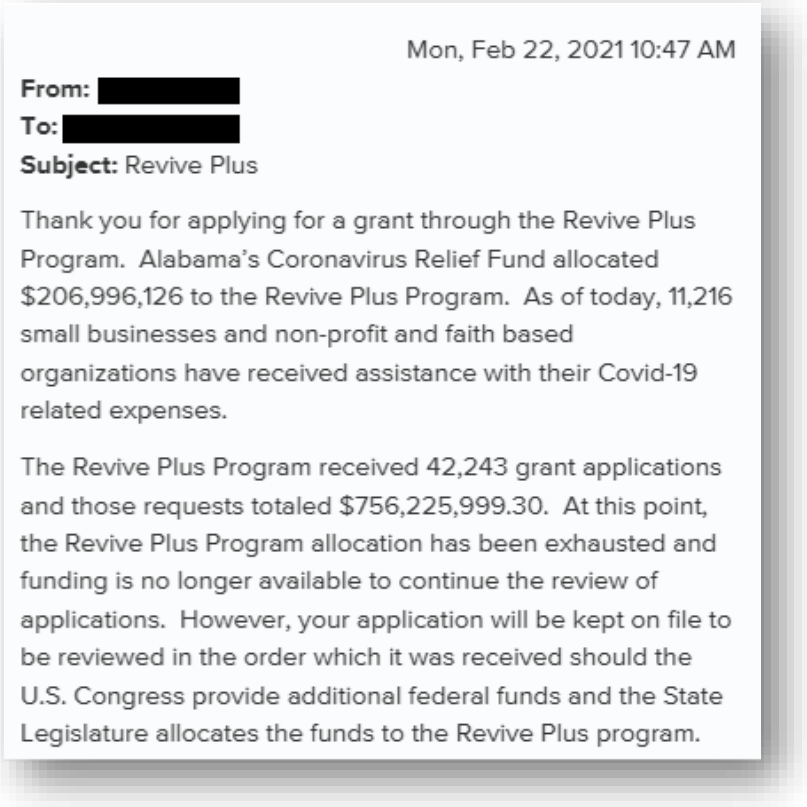
Printed Name: Patrick Sellers Title: Exec Dir

Signature: [signature] Date: 23Nov20

64. In the Certification and Assurance form, **SELLERS** falsely and fraudulently represented under penalty of perjury that he had "the authority on behalf of [ASMBC 501(c)(3)] to request payment from the State of Alabama ('State') of funding from the Coronavirus Relief Fund," even though he did not have the authority to seek grants on behalf of ASMBC.

65. In fact, shortly after **SELLERS** submitted his application for a Revive Plus grant for ASMBC 501(c)(3), Individual #1 applied for a Revive Plus grant for ASMBC—unaware that **SELLERS** had already submitted an application in the name of ASMBC.

66. Because the Revive Plus fund had already been exhausted by prior applications (including **SELLERS**' unauthorized application), Individual #1's legitimate, authorized application was denied, as reflected in the submissions portal message captured in the screenshot below.



Mon, Feb 22, 2021 10:47 AM

From: [redacted]
To: [redacted]
Subject: Revive Plus

Thank you for applying for a grant through the Revive Plus Program. Alabama's Coronavirus Relief Fund allocated $206,996,126 to the Revive Plus Program. As of today, 11,216 small businesses and non-profit and faith based organizations have received assistance with their Covid-19 related expenses.

The Revive Plus Program received 42,243 grant applications and those requests totaled $756,225,999.30. At this point, the Revive Plus Program allocation has been exhausted and funding is no longer available to continue the review of applications. However, your application will be kept on file to be reviewed in the order which it was received should the U.S. Congress provide additional federal funds and the State Legislature allocates the funds to the Revive Plus program.

67. **SELLERS** also falsely and fraudulently represented that the "necessary expenditures charged to or made against this award will be only those expenditures to prevent, prepare for, and respond to coronavirus and no other purpose."

68. Similarly, in response to a prompt in the application to "Please tell us about your business or organization and how you plan to use the funds received from this grant," **SELLERS** falsely and fraudulently represented, "These funds would be used to cover a portion of payroll as well as to continue [to] provide pandemic relief due to the affects [*sic*] of covid19."

69. To the contrary, after the ASMBC 501(c)(3) bank account ending in -3848 received $20,000 in funding from the State of Alabama on November 30, 2020, **SELLERS** used those grant proceeds for various personal purchases.

70. For instance, in December 2020, funds from the ASMBC 501(c)(3) bank account ending in -3848 were used to make a $4,705 payment to University #1.

71. According to records obtained from University #1, the payment was for **SELLERS**' daughter's undergraduate tuition, technology and access fee, student services fee, and green fund fee.

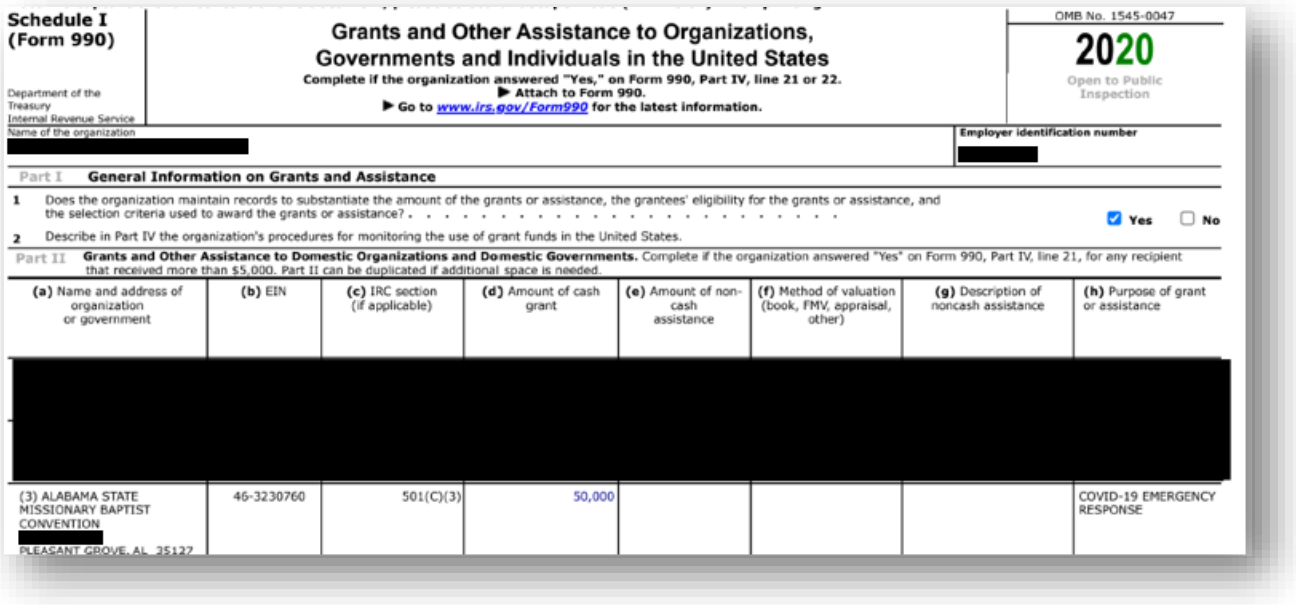
72. Finally, elsewhere in the application, **SELLERS** falsely and fraudulently represented that ASMBC 501(c)(3) had not "received an SBA-backed

Paycheck Protection Program loan or an Economic Injury Disaster Loan Emergency Advance," even though he had already obtained an EIDL loan for ASMBC 501(c)(3), as detailed above.

ASMBC 501(c)(3)'s Non-Profit #1 COVID-19 Relief Grant

73. In or about December 2020, **SELLERS** obtained a $50,000 grant on behalf of ASMBC 501(c)(3) from Non-Profit #1 for "COVID-19 Emergency Response."

74. In documenting the grant, Non-Profit #1 recorded ASMBC 501(c)(3)'s mailing address as **SELLERS**' home address in Pleasant Grove, Alabama, rather than ASMBC's official mailing address in Selma, Alabama, as reflected in the screenshot below of the Form 990 documenting the grant.



Schedule I (Form 990)

Department of the Treasury
Internal Revenue Service

Grants and Other Assistance to Organizations, Governments and Individuals in the United States

Complete if the organization answered "Yes," on Form 990, Part IV, line 21 or 22.
▶ **Attach to Form 990.**
▶ **Go to www.irs.gov/Form990 for the latest information.**

OMB No. 1545-0047

2020

Open to Public Inspection

Name of the organization [redacted]

Employer identification number [redacted]

Part I General Information on Grants and Assistance

1 Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? . . . . . ☑ Yes ☐ No

2 Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than $5,000. Part II can be duplicated if additional space is needed.

(a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
[redacted]							
(3) ALABAMA STATE MISSIONARY BAPTIST CONVENTION [redacted] PLEASANT GROVE, AL 35127	46-3230760	501(C)(3)	50,000				COVID-19 EMERGENCY RESPONSE

75. Furthermore, even though the grant was provided for COVID-19 Emergency Response, **SELLERS** used the grant proceeds for various personal purchases.

76. For instance, after $50,000 was deposited into the ASMBC 501(c)(3) account ending in -3848 on December 14, 2020, **SELLERS** used funds from the account to make a $3,916.13 payment to University #2 on January 3, 2021.

77. According to records obtained from University #2, the payment was to satisfy the balance of registration fees for another one of **SELLERS**' daughters.

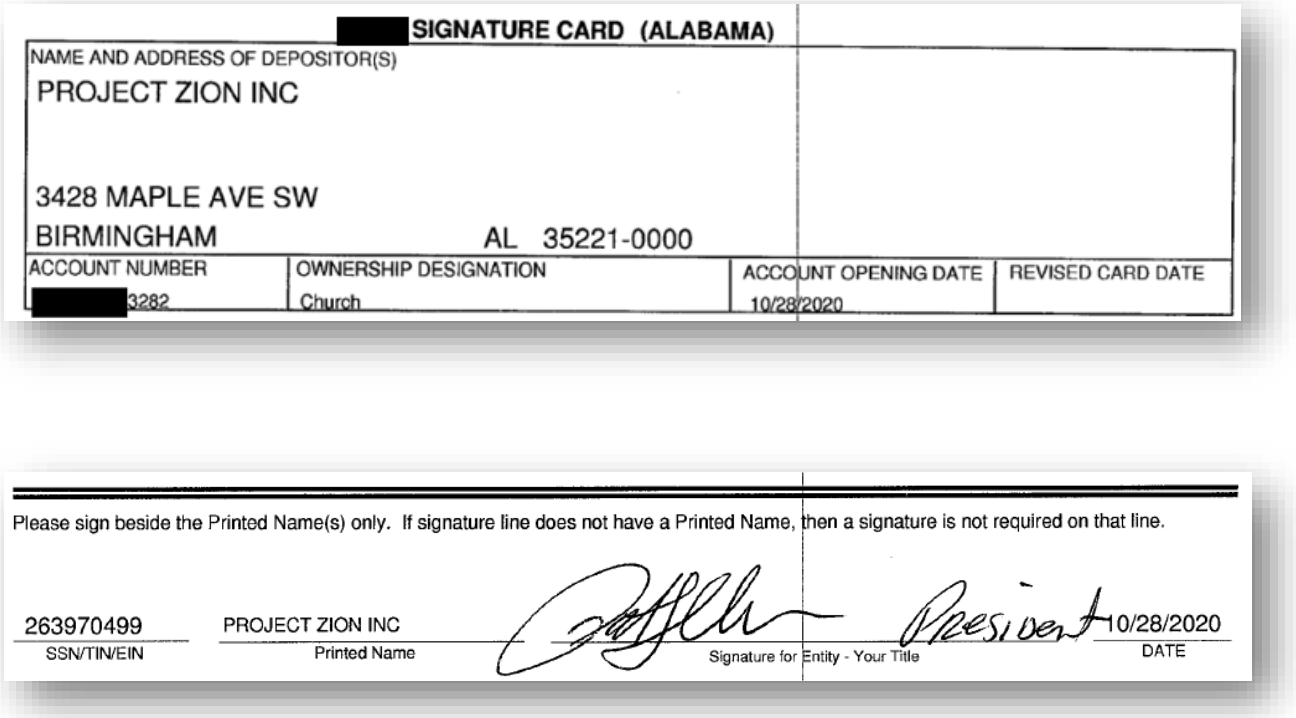
78. Similarly, after the grant proceeds were deposited into the ASMBC 501(c)(3) account ending in -3848, **SELLERS** used funds from the account to make a series of payments totaling $5,654.61 to Home Equity Line of Credit Provider #1.

79. According to records obtained from Home Equity Line of Credit Provider #1, the payments went towards paying off a $25,000 home equity line of credit taken out in **SELLERS**' mother's name and on **SELLERS**' home.

Project Zion, Inc.

80. At all times relevant to the Indictment, **SELLERS** was also the registered agent of another non-profit entity, Project Zion, Inc. ("Project Zion").

81. On October 28, 2020, **SELLERS** opened a bank account ending in -3282 for Project Zion, as reflected in the screenshot of the account's signature card below.



[redacted] SIGNATURE CARD (ALABAMA)

NAME AND ADDRESS OF DEPOSITOR(S)
PROJECT ZION INC

3428 MAPLE AVE SW
BIRMINGHAM AL 35221-0000

ACCOUNT NUMBER	OWNERSHIP DESIGNATION	ACCOUNT OPENING DATE	REVISED CARD DATE
[redacted]3282	Church	10/28/2020	

Please sign beside the Printed Name(s) only. If signature line does not have a Printed Name, then a signature is not required on that line.

263970499	PROJECT ZION INC	President	10/28/2020
SSN/TIN/EIN	Printed Name	Signature for Entity - Your Title	DATE

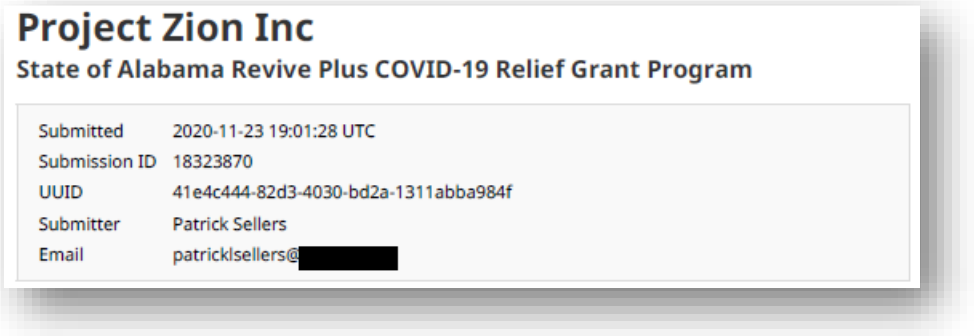
82. At all times relevant to the Indictment, **SELLERS** was the sole signatory to the account, as well as the sole person with access to the account.

Project Zion's State of Alabama Revive Plus COVID-19 Relief Grant

83. In or about November 2020, **SELLERS** submitted an application to the State of Alabama for a grant for Project Zion from Alabama's Revive Plus COVID-19 Relief Grant Program.

84. **SELLERS** listed himself as the primary contact on the application and, in doing so, provided contact information details – specifically, patricklsellers@[Email Account Provider #1].com and XXX-XXX-5370 – that tie directly back to him, as discussed in paragraphs 28 and 29 above.

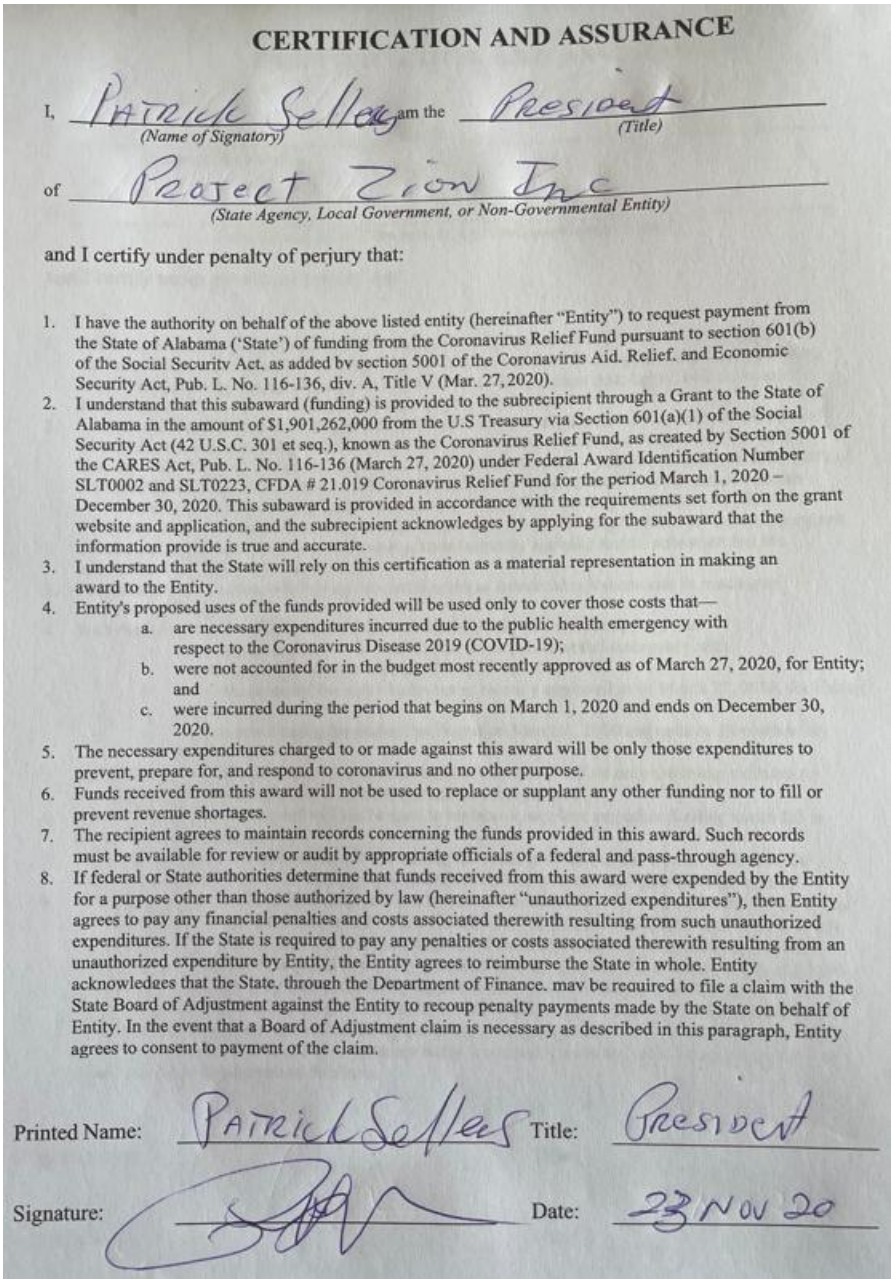
85. The application was officially submitted through the State of Alabama Submissions Portal using patricklsellers@[Email Account Provider #1].com, as reflected in the screenshot below of the Submissions Portal.



86. The application submitted by **SELLERS** included materially false and fraudulent representations.

87. As an initial matter, **SELLERS** falsely and fraudulently represented that Project Zion had ten employees, even though that entity has never had any reported employees, as confirmed by the Alabama Department of Labor.

88. Furthermore, as part of the application process, **SELLERS** submitted a signed Certification and Assurance form, as reflected in the screenshot below.



CERTIFICATION AND ASSURANCE

I, Patrick Sellers (Name of Signatory) am the President (Title)

of Project Zion Inc (State Agency, Local Government, or Non-Governmental Entity)

and I certify under penalty of perjury that:

1. I have the authority on behalf of the above listed entity (hereinafter "Entity") to request payment from the State of Alabama ('State') of funding from the Coronavirus Relief Fund pursuant to section 601(b) of the Social Security Act, as added by section 5001 of the Coronavirus Aid, Relief, and Economic Security Act, Pub. L. No. 116-136, div. A, Title V (Mar. 27, 2020).
2. I understand that this subaward (funding) is provided to the subrecipient through a Grant to the State of Alabama in the amount of $1,901,262,000 from the U.S Treasury via Section 601(a)(1) of the Social Security Act (42 U.S.C. 301 et seq.), known as the Coronavirus Relief Fund, as created by Section 5001 of the CARES Act, Pub. L. No. 116-136 (March 27, 2020) under Federal Award Identification Number SLT0002 and SLT0223, CFDA # 21.019 Coronavirus Relief Fund for the period March 1, 2020 – December 30, 2020. This subaward is provided in accordance with the requirements set forth on the grant website and application, and the subrecipient acknowledges by applying for the subaward that the information provide is true and accurate.
3. I understand that the State will rely on this certification as a material representation in making an award to the Entity.
4. Entity's proposed uses of the funds provided will be used only to cover those costs that—
   a. are necessary expenditures incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19);
   b. were not accounted for in the budget most recently approved as of March 27, 2020, for Entity; and
   c. were incurred during the period that begins on March 1, 2020 and ends on December 30, 2020.
5. The necessary expenditures charged to or made against this award will be only those expenditures to prevent, prepare for, and respond to coronavirus and no other purpose.
6. Funds received from this award will not be used to replace or supplant any other funding nor to fill or prevent revenue shortages.
7. The recipient agrees to maintain records concerning the funds provided in this award. Such records must be available for review or audit by appropriate officials of a federal and pass-through agency.
8. If federal or State authorities determine that funds received from this award were expended by the Entity for a purpose other than those authorized by law (hereinafter "unauthorized expenditures"), then Entity agrees to pay any financial penalties and costs associated therewith resulting from such unauthorized expenditures. If the State is required to pay any penalties or costs associated therewith resulting from an unauthorized expenditure by Entity, the Entity agrees to reimburse the State in whole. Entity acknowledges that the State, through the Department of Finance, may be required to file a claim with the State Board of Adjustment against the Entity to recoup penalty payments made by the State on behalf of Entity. In the event that a Board of Adjustment claim is necessary as described in this paragraph, Entity agrees to consent to payment of the claim.

Printed Name: Patrick Sellers Title: President

Signature: Date: 23 NOV 20

89. In the Certification and Assurance form, **SELLERS** falsely and fraudulently represented that the "necessary expenditures charged to or made against this award will be only those expenditures to prevent, prepare for, and respond to coronavirus and no other purpose."

90. Similarly, in response to a prompt in the application to "Please tell us about your business or organization and how you plan to use the funds received from this grant," **SELLERS** falsely and fraudulently represented, "Project Zion Inc is a nonprofit organization [that] was created to meet charitable needs within the western communities of Birmingham. F[u]nds will cover partial payroll and cover expenses due to the affects [*sic*] of covid 19."

91. To the contrary, after the Project Zion bank account ending in -3282 received $20,000 in funding from the State of Alabama on December 3, 2020, **SELLERS** used those grant proceeds for various personal purchases.

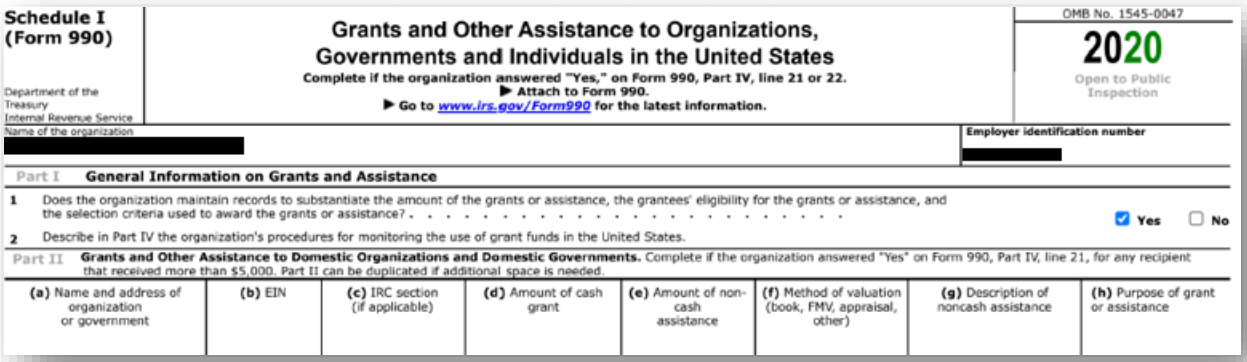
92. For instance, **SELLERS** used funds from the account to make a $2,328 payment to University #2 on January 3, 2021.

93. According to records obtained from University #2, the payment was to satisfy a portion of **SELLERS**' daughter's registration fees.

94. As discussed above, the remainder of **SELLERS**' daughter's registration fee balance was paid from the ASMBC 501(c)(3) account ending in -3848 by another payment that same day.

Project Zion's Non-Profit #1 COVID-19 Relief Grant

95. In or about December 2020, **SELLERS** obtained a $50,000 grant on behalf of Project Zion from Non-Profit #1 for "COVID-19 Emergency Response," as reflected in the screenshots below of the Form 990 documenting the grant.



Schedule I (Form 990)

Department of the Treasury
Internal Revenue Service

Grants and Other Assistance to Organizations, Governments and Individuals in the United States

Complete if the organization answered "Yes," on Form 990, Part IV, line 21 or 22.
▶ **Attach to Form 990.**
▶ **Go to www.irs.gov/Form990 for the latest information.**

OMB No. 1545-0047

2020

Open to Public Inspection

Name of the organization [redacted]

Employer identification number [redacted]

Part I General Information on Grants and Assistance

1 Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? . . . . . ☑ Yes ☐ No

2 Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than $5,000. Part II can be duplicated if additional space is needed.

(a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
(19) PROJECT ZION INC 3428 MAPLE AVENUE SW BIRMINGHAM, AL 35221	26-3970499	501(C)(3)	50,000				COVID-19 EMERGENCY RESPONSE

96. Even though the grant was provided for COVID-19 Emergency Response, **SELLERS** used the grant proceeds for various personal purchases.

97. For instance, after $50,000 was deposited into the Project Zion account ending -3282 on December 22, 2020, **SELLERS** used funds from the account to make a $1,548 payment to University #1 on January 19, 2021.

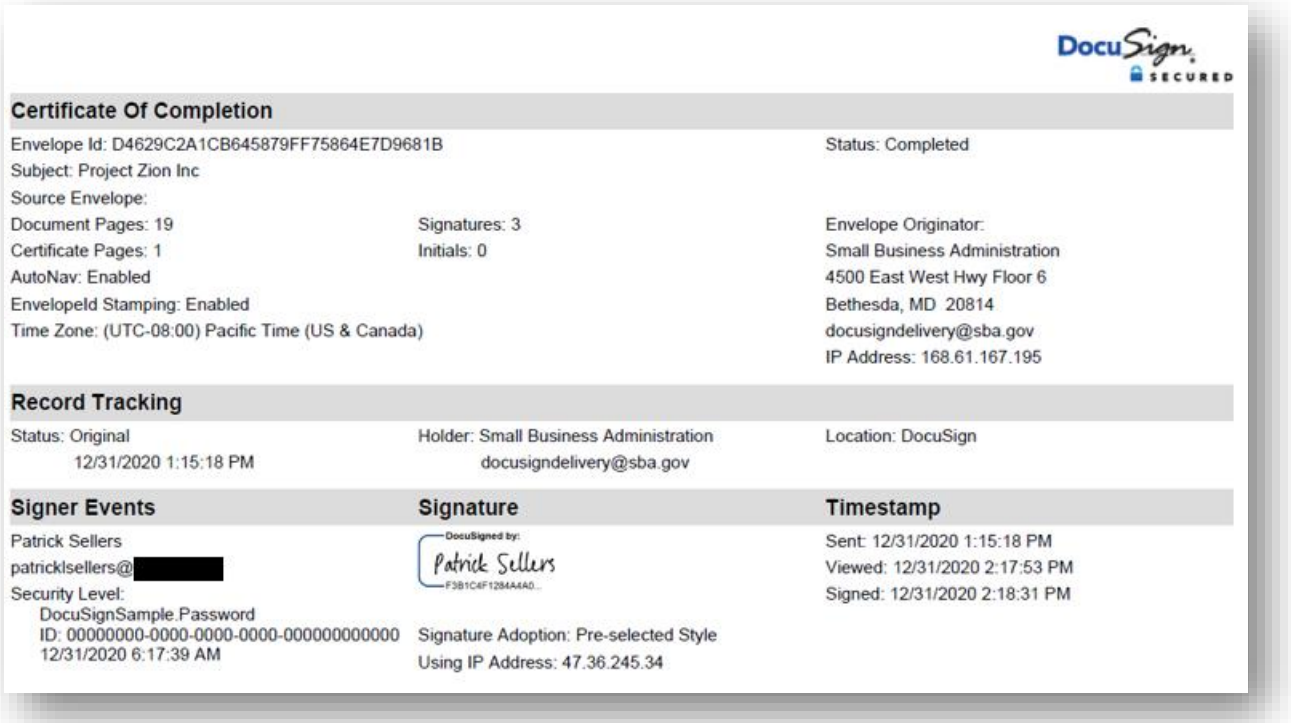
98. According to records obtained from University #1, the payment was for his daughter's commuter meal plan, undergraduate tuition, technology and access fee, and student services fee.

Project Zion's EIDL Loan

99. In or about December 2020, **SELLERS** submitted an application to the SBA for an EIDL loan for Project Zion.

100. **SELLERS** listed himself as the primary contact on the application and, in doing so, provided contact information details – specifically, patricklsellers@[Email Account Provider #1].com and XXX-XXX-5370 – that tie directly back to him, as discussed in paragraphs 28 and 29 above.

101. The application was officially executed via DocuSign using patricklsellers@[Email Account Provider #1].com, as reflected in the screenshot below of the executed Certificate of Completion.



DocuSign SECURED

Certificate Of Completion

Envelope Id: D4629C2A1CB645879FF75864E7D9681B
Subject: Project Zion Inc
Source Envelope:
Document Pages: 19 Signatures: 3
Certificate Pages: 1 Initials: 0
AutoNav: Enabled
EnvelopeId Stamping: Enabled
Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Status: Completed

Envelope Originator:
Small Business Administration
4500 East West Hwy Floor 6
Bethesda, MD 20814
docusigndelivery@sba.gov
IP Address: 168.61.167.195

Record Tracking

Status: Original
12/31/2020 1:15:18 PM

Holder: Small Business Administration
docusigndelivery@sba.gov

Location: DocuSign

Signer Events	Signature	Timestamp
Patrick Sellers patricklsellers@[redacted] Security Level: DocuSignSample.Password ID: 00000000-0000-0000-0000-000000000000 12/31/2020 6:17:39 AM	DocuSigned by: Patrick Sellers F3B1C4F1284A4A0... Signature Adoption: Pre-selected Style Using IP Address: 47.36.245.34	Sent: 12/31/2020 1:15:18 PM Viewed: 12/31/2020 2:17:53 PM Signed: 12/31/2020 2:18:31 PM

102. The application submitted by **SELLERS** included materially false and fraudulent representations.

103. As an initial matter, **SELLERS** falsely and fraudulently represented that Project Zion had seven employees, even though that entity has never had any reported employees, as previously discussed in paragraph 87 above.

104. Additionally, **SELLERS** falsely and fraudulently represented that "Borrower will use all the proceeds of this Loan solely as working capital to alleviate economic injury caused by [the COVID-19] disaster . . ."

105. To the contrary, after the Project Zion bank account ending in -3282 received $44,900 in EIDL funding from the SBA on January 5, 2021, **SELLERS** used those loan proceeds for various personal purchases.

106. For instance, from February 2021 through September 2021, **SELLERS** used funds from the Project Zion bank account ending in -3282 to make a series of eight payments totaling $26,673.66 to Mortgage Provider #1.

107. According to records obtained from Mortgage Provider #1, the payments from the Project Zion account ending in -3282 went towards paying off a mortgage taken out in **SELLERS**' mother's name and on **SELLERS**' home.

108. Similarly, after the EIDL loan proceeds were deposited into the Project Zion account ending in -3282, **SELLERS** used funds from the account to make a series of three payments totaling $2,316 to Home Equity Line of Credit Provider #1 starting on February 23, 2021.

109. As with the payments to Home Equity Line of Credit Provider #1 from the ASMBC 501(c)(3) account ending in -3848 discussed above, records obtained from Home Equity Line of Credit Provider #1 confirm that the payments from the Project Zion account ending in -3282 went towards paying off a $25,000 home equity line of credit taken out in **SELLERS**' mother's name and on **SELLERS**' home.

110. Finally, **SELLERS** falsely and fraudulently represented that "[a]ll representations in the Borrower's Loan application (including all supplementary submissions) are true, correct, and complete and are offered to induce SBA to make this Loan."

Sellers Lawn Care

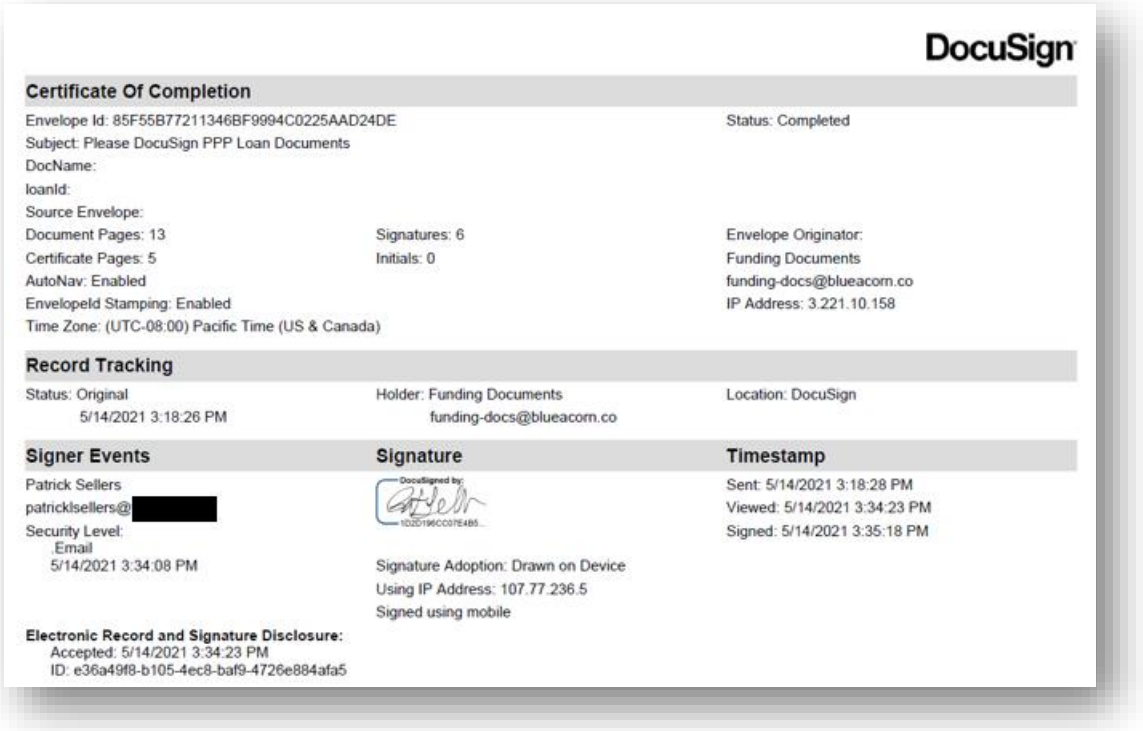
111. In or about April 2021, **SELLERS** also submitted an application to an SBA-approved lender headquartered in Arizona ("Lender #1") for a PPP loan for an alleged sole proprietorship doing business as "Sellers Lawn Care."

112. **SELLERS** listed himself as the primary contact on the application and, in doing so, provided contact information details – specifically, patricklsellers@[Email Account Provider #1].com and XXX-XXX-5370 – that tie directly back to him, as discussed in paragraphs 28 and 29 above.

113. **SELLERS** verified his identity by submitting a "selfie" photo with the PPP application, a screenshot of which is included below.



114. The application was officially executed via DocuSign using patricklsellers@[Email Account Provider #1].com, as reflected in the screenshot below of the executed Certificate of Completion.



DocuSign

Certificate Of Completion

Envelope Id: 85F55B77211346BF9994C0225AAD24DE
Subject: Please DocuSign PPP Loan Documents
DocName:
loanId:
Source Envelope:
Document Pages: 13 Signatures: 6
Certificate Pages: 5 Initials: 0
AutoNav: Enabled
EnvelopeId Stamping: Enabled
Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Status: Completed

Envelope Originator:
Funding Documents
funding-docs@blueacorn.co
IP Address: 3.221.10.158

Record Tracking

Status: Original
5/14/2021 3:18:26 PM

Holder: Funding Documents
funding-docs@blueacorn.co

Location: DocuSign

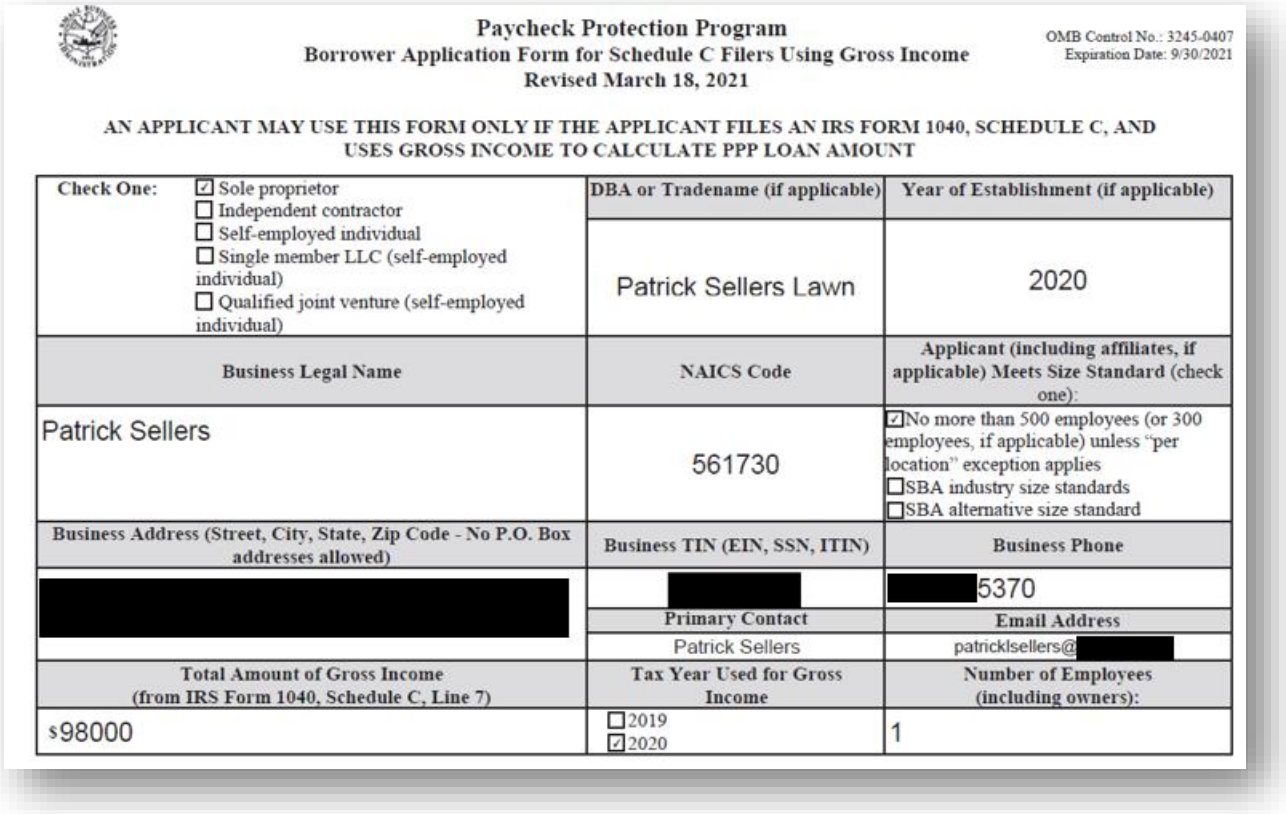
Signer Events	Signature	Timestamp
Patrick Sellers patricklsellers@[redacted] Security Level: Email 5/14/2021 3:34:08 PM	DocuSigned by: [signature] Signature Adoption: Drawn on Device Using IP Address: 107.77.236.5 Signed using mobile	Sent: 5/14/2021 3:18:28 PM Viewed: 5/14/2021 3:34:23 PM Signed: 5/14/2021 3:35:18 PM

Electronic Record and Signature Disclosure:
Accepted: 5/14/2021 3:34:23 PM
ID: e36a49f8-b105-4ec8-baf9-4726e884afa5

115. The application submitted by **SELLERS** included materially false and fraudulent representations, despite his certification in the application that "the information provided in this application and the information provided in all supporting documents and forms is true and accurate in all material respects."

116. Among **SELLERS'** false and fraudulent representations was the repeated assertion that Sellers Lawn Care had generated $98,000 in gross income during Tax Year 2020, as well as the repeated assertion that **SELLERS** had reported such income to the Internal Revenue Service ("IRS") by filing an IRS Form 1040, Schedule C (Profit or Loss from Business, Sole Proprietorship) for Tax Year 2020,

as reflected in the screenshot below of the Borrower Application Form for Schedule C Filers Using Gross Income.



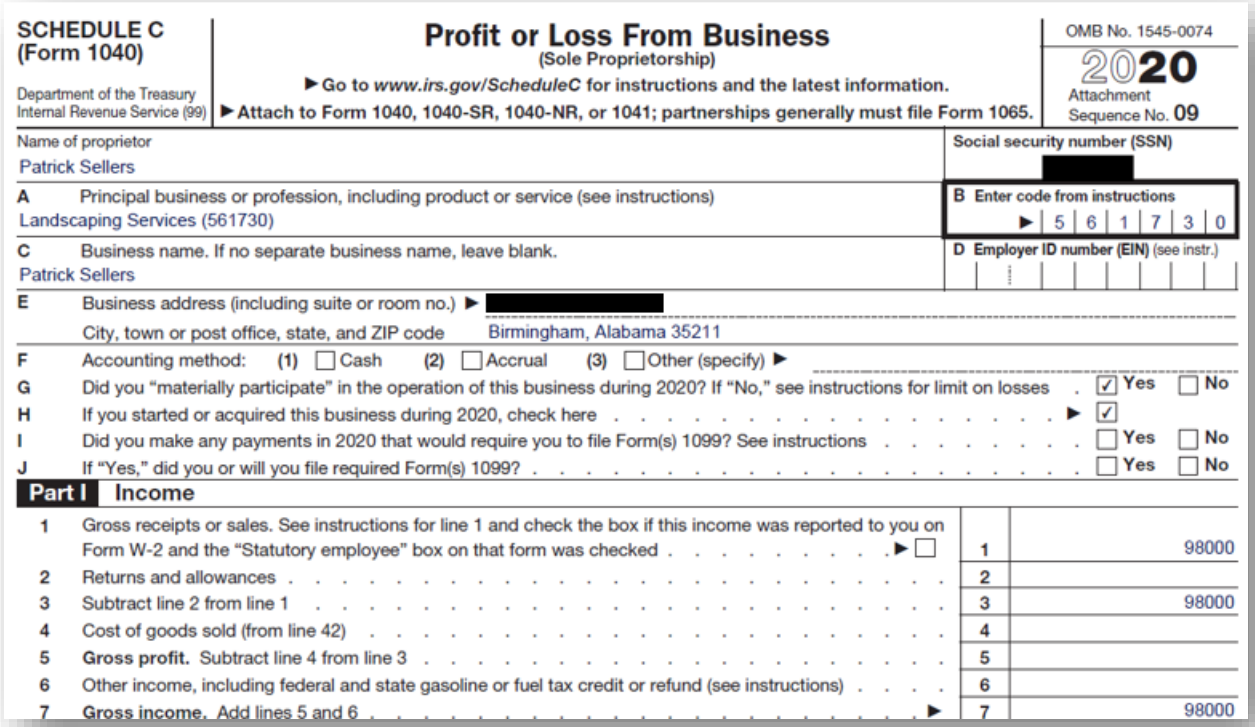
Paycheck Protection Program
Borrower Application Form for Schedule C Filers Using Gross Income
Revised March 18, 2021

OMB Control No.: 3245-0407
Expiration Date: 9/30/2021

AN APPLICANT MAY USE THIS FORM ONLY IF THE APPLICANT FILES AN IRS FORM 1040, SCHEDULE C, AND USES GROSS INCOME TO CALCULATE PPP LOAN AMOUNT

Check One: ☑ Sole proprietor ☐ Independent contractor ☐ Self-employed individual ☐ Single member LLC (self-employed individual) ☐ Qualified joint venture (self-employed individual)	**DBA or Tradename (if applicable)**	**Year of Establishment (if applicable)**
	Patrick Sellers Lawn	2020
Business Legal Name	**NAICS Code**	**Applicant (including affiliates, if applicable) Meets Size Standard** (check one):
Patrick Sellers	561730	☑ No more than 500 employees (or 300 employees, if applicable) unless "per location" exception applies ☐ SBA industry size standards ☐ SBA alternative size standard
Business Address (Street, City, State, Zip Code - No P.O. Box addresses allowed)	**Business TIN (EIN, SSN, ITIN)**	**Business Phone**
[redacted]	[redacted]	[redacted]5370
	Primary Contact	**Email Address**
	Patrick Sellers	patricklsellers@[redacted]
Total Amount of Gross Income (from IRS Form 1040, Schedule C, Line 7)	**Tax Year Used for Gross Income**	**Number of Employees (including owners):**
$98000	☐ 2019 ☑ 2020	1

117. Indeed, not only did **SELLERS** make assertions about his sole proprietorship income and tax reporting status on the above Borrower Application Form, but he also made them by filing an alleged copy of his Schedule C from Tax Year 2020 in support of his PPP loan application, as reflected in the screenshot below of the purported Schedule C.



SCHEDULE C (Form 1040)

Department of the Treasury
Internal Revenue Service (99)

Profit or Loss From Business
(Sole Proprietorship)

▶ Go to *www.irs.gov/ScheduleC* for instructions and the latest information.
▶ Attach to Form 1040, 1040-SR, 1040-NR, or 1041; partnerships generally must file Form 1065.

OMB No. 1545-0074
2020
Attachment Sequence No. 09

Name of proprietor: Patrick Sellers
Social security number (SSN): [redacted]

A Principal business or profession, including product or service (see instructions): Landscaping Services (561730)
B Enter code from instructions ▶ 5 6 1 7 3 0

C Business name. If no separate business name, leave blank.: Patrick Sellers
D Employer ID number (EIN) (see instr.)

E Business address (including suite or room no.) ▶ [redacted]
City, town or post office, state, and ZIP code: Birmingham, Alabama 35211

F Accounting method: (1) ☐ Cash (2) ☐ Accrual (3) ☐ Other (specify) ▶

G Did you "materially participate" in the operation of this business during 2020? If "No," see instructions for limit on losses . ☑ Yes ☐ No

H If you started or acquired this business during 2020, check here . . . ▶ ☑

I Did you make any payments in 2020 that would require you to file Form(s) 1099? See instructions . ☐ Yes ☐ No

J If "Yes," did you or will you file required Form(s) 1099? . ☐ Yes ☐ No

Part I Income

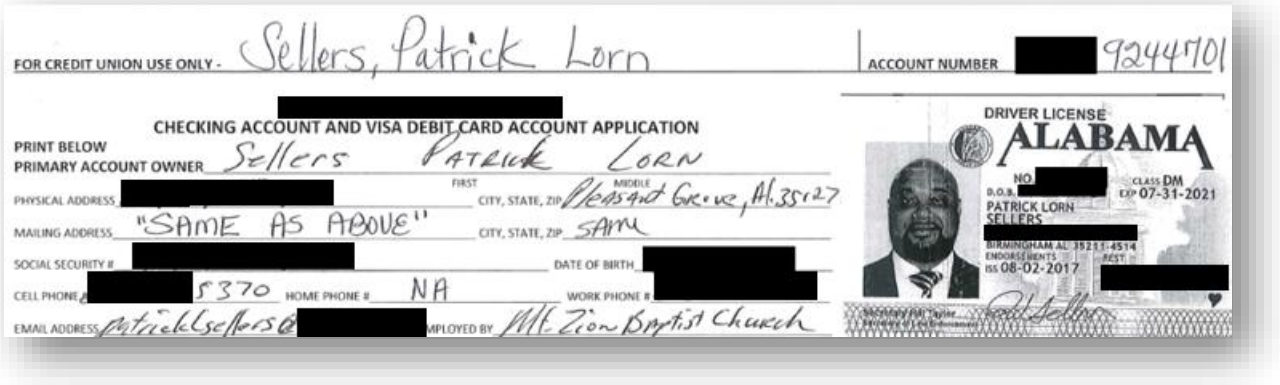
1	Gross receipts or sales. See instructions for line 1 and check the box if this income was reported to you on Form W-2 and the "Statutory employee" box on that form was checked ▶ ☐	1	98000
2	Returns and allowances	2	
3	Subtract line 2 from line 1	3	98000
4	Cost of goods sold (from line 42)	4	
5	**Gross profit.** Subtract line 4 from line 3	5	
6	Other income, including federal and state gasoline or fuel tax credit or refund (see instructions)	6	
7	**Gross income.** Add lines 5 and 6 ▶	7	98000

118. In reality, however, **SELLERS** never filed a Schedule C during Tax Year 2020, as reflected in the screenshot below of fact of filing records obtained from the IRS.

Taxpayer Name	Taxpayer Identification Number	Type of Tax Information Enclosed	Tax Years Filed	Tax Records No Record
Patrick Lorn Sellers	[redacted]	Form 1040, U.S. Individual Income Tax Return	2019-2021	2018
		Form 1040, Schedule C, Profit or Loss From Business (Sole Proprietorship)		2018-2021

119. Based on these misrepresentations by **SELLERS**, Lender #1 approved the loan and deposited $20,415 into an account ending in -9244 at Credit Union #1 on May 21, 2021.

120. According to records obtained from Credit Union #1, the primary account owner of the account ending in -9244 is **SELLERS**, as reflected in the screenshot below of the Account Application form.


FOR CREDIT UNION USE ONLY - Sellers, Patrick Lorn ACCOUNT NUMBER [redacted] 9244701

[redacted]

CHECKING ACCOUNT AND VISA DEBIT CARD ACCOUNT APPLICATION

PRINT BELOW PRIMARY ACCOUNT OWNER Sellers Patrick Lorn (FIRST MIDDLE)

PHYSICAL ADDRESS [redacted] CITY, STATE, ZIP Pleasant Grove, AL 35127

MAILING ADDRESS "SAME AS ABOVE" CITY, STATE, ZIP SAME

SOCIAL SECURITY # [redacted] DATE OF BIRTH [redacted]

CELL PHONE # [redacted] 5370 HOME PHONE # NA WORK PHONE # [redacted]

EMAIL ADDRESS patricklsellers@[redacted] EMPLOYED BY Mt. Zion Baptist Church

DRIVER LICENSE ALABAMA NO [redacted] CLASS DM EXP 07-31-2021 D.O.B. [redacted] PATRICK LORN SELLERS [redacted] BIRMINGHAM AL 35211-4514 ENDORSEMENTS ISS 08-02-2017 RESTR [redacted]

COUNTS ONE THROUGH FOUR
Wire Fraud
[18 U.S.C. § 1343]

121. The allegations contained in Paragraphs 1 through 120 of this Indictment are hereby repeated, realleged, and incorporated by reference, as if fully set forth herein.

The Scheme and Artifice

122. Beginning in or about July 2020 and continuing through in or about May 2021, in the Northern District of Alabama and elsewhere, the defendant,

PATRICK LORN SELLERS, knowingly devised and intended to devise a scheme and artifice to defraud, and to obtain money and property from entities including the SBA, Lender #1, the State of Alabama, and Non-Profit #1, by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means of the Scheme and Artifice

123. It was a part of the scheme and artifice to defraud that **SELLERS** submitted an EIDL loan application to the SBA on behalf of ASMBC 501(c)(3) that included materially false and fraudulent representations, including that he had the authority to apply for the loan on behalf of ASMBC 501(c)(3), that ASMBC 501(c)(3) had five employees, that the loan proceeds would be used solely as working capital, and that all of the representations in the application were true, correct, and complete.

124. It was a further part of the scheme and artifice to defraud that **SELLERS** caused the SBA to send EIDL loan proceeds to an ASMBC 501(c)(3) bank account he controlled via two separate interstate wire transmissions.

125. It was a further part of the scheme and artifice to defraud that **SELLERS** submitted a Non-Profit COVID-19 Relief grant application to the State of Alabama on behalf of ASMBC 501(c)(3) that included materially false and fraudulent representations, including that he had the authority to apply for the grant

on behalf of ASMBC 501(c)(3), that the grant proceeds would be used solely for expenditures to prevent, prepare for, and respond to the COVID-19 pandemic, and that ASMBC 501(c)(3) had not previously received a PPP or EIDL loan.

126. It was a further part of the scheme and artifice to defraud that **SELLERS** caused the State of Alabama to deposit the Non-Profit COVID-19 Relief grant proceeds into an ASMBC 501(c)(3) bank account controlled by **SELLERS**.

127. It was a further part of the scheme and artifice to defraud that **SELLERS** submitted a Revive Plus COVID-19 Relief grant application to the State of Alabama on behalf of ASMBC 501(c)(3) that included materially false and fraudulent representations, including that he had the authority to apply for the grant on behalf of ASMBC 501(c)(3), that ASMBC 501(c)(3) had ten employees, that the grant proceeds would be used solely for expenditures to prevent, prepare for, and respond to the COVID-19 pandemic, and that ASMBC 501(c)(3) had not previously received a PPP or EIDL loan.

128. It was a further part of the scheme and artifice to defraud that **SELLERS** caused the State of Alabama to deposit the Revive Plus COVID-19 Relief grant proceeds into an ASMBC 501(c)(3) bank account controlled by **SELLERS**.

129. It was a further part of the scheme and artifice to defraud that **SELLERS** submitted an application to Non-Profit #1 on behalf of ASMBC 501(c)(3) for a grant to provide food assistance related to the COVID-19 pandemic.

130. It was a further part of the scheme and artifice to defraud that **SELLERS** caused Non-Profit #1 to transfer the grant proceeds to ASMBC 501(c)(3) via check, which was then deposited into an ASMBC 501(c)(3) bank account controlled by **SELLERS**.

131. It was a further part of the scheme and artifice to defraud that **SELLERS** used the grant proceeds for a purpose other than providing food assistance related to the COVID-19 pandemic.

132. It was a further part of the scheme and artifice to defraud that **SELLERS** submitted a Revive Plus COVID-19 Relief grant application to the State of Alabama on behalf of Project Zion that included materially false and fraudulent representations, including that Project Zion had ten employees and that the grant proceeds would be used solely for expenditures to prevent, prepare for, and respond to the COVID-19 pandemic.

133. It was a further part of the scheme and artifice to defraud that **SELLERS** caused the State of Alabama to deposit the Revive Plus COVID-19 Relief grant proceeds into a Project Zion bank account controlled by **SELLERS**.

134. It was a further part of the scheme and artifice to defraud that **SELLERS** submitted an application to Non-Profit #1 on behalf of Project Zion for a grant to provide food assistance related to the COVID-19 pandemic.

135. It was a further part of the scheme and artifice to defraud that **SELLERS** caused Non-Profit #1 to transfer the grant proceeds to Project Zion via check, which was then deposited into a Project Zion bank account controlled by **SELLERS**.

136. It was a further part of the scheme and artifice to defraud that **SELLERS** used the grant proceeds for a purpose other than providing food assistance related to the COVID-19 pandemic.

137. It was a further part of the scheme and artifice to defraud that **SELLERS** submitted an EIDL loan application to the SBA on behalf of Project Zion that included materially false and fraudulent representations, including that Project Zion had seven employees, that the loan proceeds would be used solely as working capital, and that all of the representations in the application were true, correct, and complete.

138. It was a further part of the scheme and artifice to defraud that **SELLERS** caused the SBA to send EIDL loan proceeds to a Project Zion bank account he controlled via an interstate wire transmission.

139. It was a further part of the scheme and artifice to defraud that **SELLERS** submitted a PPP loan application to Lender #1 and the SBA on behalf of a sole proprietorship doing business as "Sellers Lawn Care" that included materially false and fraudulent representations, including false information about the sole proprietorship's gross income and tax reporting status.

140. It was a further part of the scheme and artifice to defraud that **SELLERS** caused Lender #1 to send PPP loan proceeds to his personal bank account via an interstate wire transmission.

The Wire Communications

141. On or about the dates listed below for each count, within Jefferson County in the Northern District of Alabama, and elsewhere, the defendant, **PATRICK LORN SELLERS**, for the purpose of executing the above-described scheme and artifice to defraud, did cause to be transmitted in interstate commerce, by means of a wire communication, certain signs and signals described below, each transmission constituting a separate count:

COUNT	DATE	WIRE COMMUNICATION
Count One	July 8, 2020	An interstate wire transfer of $5,000 in EIDL funds from the SBA into an ASMBC bank account ending in -3848 controlled by **SELLERS**.

Count Two	July 27, 2020	An interstate wire transfer of $15,000 in EIDL funds from the SBA into an ASMBC bank account ending in -3848 controlled by **SELLERS**.
Count Three	January 5, 2021	An interstate wire transfer of $44,900 in EIDL funds from the SBA into a Project Zion bank account ending in -3282 controlled by **SELLERS**.
Count Four	May 12, 2021	An interstate wire transfer of $20,415 in PPP funds from Lender #1 into **SELLERS**' personal bank account ending in -9244.

All in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE
[18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A), and 28 U.S.C. § 2461(c)]

1. The allegations contained in Counts One through Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), § 982(a)(2)(A), and 28 U.S.C. § 2461(c).

2. Upon conviction of the offenses set forth in Counts One through Four of this Indictment, the defendant shall forfeit to the United States any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of

money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

/s/electronic signature
FOREPERSON OF THE GRAND JURY

PHILLIP W. WILLIAMS JR.
United States Attorney

/s/Brett A. Janich
BRETT A. JANICH
RYAN S. RUMMAGE
Assistant United States Attorneys