

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
STEVEN COOK, )  
)  
Defendant. )

CRIMINAL NO. 24-40032-JPG

STIPULATION OF FACTS

The United States of America by and through its attorney, Hal Goldsmith, Special Attorney to the United States Attorney General Pursuant to 28 U.S.C., Section 515, and the defendant, Steven Cook, by and through his attorney, John Stobbs, hereby stipulate as follows:

1. Steven Cook (hereinafter referred to as "Cook") was the President of SouthernTrust Bank. SouthernTrust Bank had branches located in Marion, Vienna, and Goreville, Illinois, and its deposits were insured by the Federal Deposit Insurance Corporation ("FDIC"). In addition to running and supervising the day-to-day operations of the bank, Cook served as a member of SouthernTrust Bank's Board of Trustees, as well as a member of its Loan Committee. Cook facilitated the sale by Results Home Buyers 2 of its seven commercial rental properties to Lawler and Maze Properties, LLC during 2022 by approving and obtaining approval of the SouthernTrust Bank loan to Lawler and Maze Properties, LLC.

2. Brandon Zanotti owned seven commercial rental properties located in Williamson and Franklin Counties, Illinois through a company he was a part owner of, Results Home Buyers 2, LLC. During 2022, Defendant, through Results Home Buyers 2, LLC, entered into an agreement to sell the seven commercial rental properties to Lawler and Maze Properties, LLC,

owned by Justin Maze and David Lawler. Lawler and Maze Properties, LLC financed the full purchase price of the properties through a loan from SouthernTrust Bank.

3. Justin Maze and David Lawler owned and operated a real estate management firm known as Lawler and Maze Properties, LLC.

**COUNT 1**

4. On April 6, 2022, Cook, Zanotti, and Maze, met at SouthernTrust Bank in Marion, Illinois and discussed a proposed sale of seven properties from Results Home Buyers 2, LLC to Lawler and Maze Properties, LLC. Cook agreed that SouthernTrust Bank would lend Lawler and Maze Properties, LLC the funds necessary to purchase the seven properties from Results Home Buyers 2. It was understood by Cook, Zanotti, and Maze that the proposed transaction was a new real estate purchase, not a refinance; that Lawler and Maze Properties, LLC would not provide any cash relative to the purchase of the seven properties; and that the entire purchase price would be funded through the SouthernTrust loan proceeds. Cook advised Zanotti that in order for SouthernTrust Bank to finance the transaction, it would need to appear as if it was a refinance transaction, as opposed to a new real estate purchase, and that the paperwork would need to reflect that Lawler and Maze Properties, LLC had owned the seven properties as of February 1, 2022. It was agreed that the paperwork reflecting ownership of the seven properties by Lawler and Maze Properties, LLC would be falsely backdated to February 1, 2022, and that SouthernTrust Bank would fund an 80% sham "refinance" transaction. The actual sales price of the seven properties that Results Home Buyers 2, LLC was to sell to Lawler and Maze Properties, LLC was \$436,122.00.

5. During May, 2022, Zanotti, through Results Home Buyers 2, executed a sham Assignment of Beneficial Interests falsely reflecting in essence that Lawler and Maze Properties, LLC had owned the seven properties as of February 1, 2022. That false and backdated "Assignment of Beneficial Interests" was provided to Cook, and maintained in the books and records of SouthernTrust Bank.

6. During June, 2022, a Purchase and Sales Agreement, falsely backdated to February 1, 2022, was executed by Results Home Buyers 2, LLC and Lawler and Maze Properties, LLC which reflected a false purchase price of \$545,152.00. This false Purchase and Sales Agreement was provided to Cook and SouthernTrust Bank and was maintained in the books and records of SouthernTrust Bank.

7. On June 21, 2022, a false Credit Approval Form was created by SouthernTrust Bank which falsely stated a purchase price of \$545,152.00, and a cash downpayment from Lawler and Maze Properties, LLC of \$109,030.00 when, in fact, as Cook, Zanotti, and Maze knew, the actual purchase price was \$436,122.00 and there was to be no cash downpayment. The false Credit Approval Form was maintained in the books and records of SouthernTrust Bank.

8. On August 12, 2022, Cook and SouthernTrust funded the sham "refinance" transaction at 80% of the false purchase price of \$545,152.00, resulting in a total payout to Results Home Buyers 2, LLC of \$436,122.00, the agreed upon 80%.

## **COUNT 2**

9. During the same time period, August 2022, Cook also facilitated the financing of another real estate transaction involving Lawler and Maze Properties, LLC. The financing

involved four real estate properties that Lawler and Maze Properties, LLC was purchasing from Southern Property Buyers, LLC.

10. There was an agreement by Cook, Lawler, Maze, and the seller, that the sales amount of the four properties would be 80% of the total appraised value. The total appraised value was \$413,000 and therefore the actual sale amount was \$330,400. The parties agreed that the real estate contract would falsely list the sales price of \$413,000.

11. On or about August 8, 2022, Cook completed a SouthernTrust Bank credit approval form falsely stating that the loan amount would be \$330,400, and falsely indicating the borrower would supply \$82,600 in cash, for a total sale of \$413,000. The false Credit Approval Form was maintained in the books and records of SouthernTrust Bank. Further, there were four (4) Real Estate Purchase Agreements submitted to SouthernTrust Bank which falsely stated a total purchase price of \$413,000, and those forms were maintained in the books and records of SouthernTrust Bank.

12. The loan was presented to the SouthernTrust Bank loan committee on or about August 11, 2022, and the loan for \$330,400 was approved and the loan was funded by SouthernTrust Bank.

**COUNT 3**

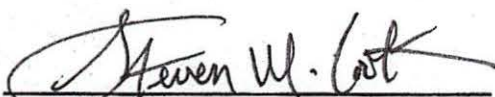
13. During November 2022, Cook facilitated an additional loan to Lawler and Maze Properties, LLC for the purchase of a real estate property located at 600 Future Street, Marion, Illinois 62959.

14. There was an agreement by Cook, Lawler, Maze, and the seller that the sales price of the property would be 80% of the total appraised value. The total appraised value was \$107,500 and therefore the actual sales amount was \$86,000.

15. On November 16, 2022, Cook completed a SouthernTrust Bank credit approval form falsely stating that the loan amount would be \$86,000 and falsely indicating that the borrowers cash "injection" would be \$21,500, for a total sale of \$107,500. The false Credit Approval Form was maintained in the books and records of SouthernTrust Bank. Further, there was a Standard Purchase and Sale Agreement submitted to SouthernTrust Bank which falsely stated a total purchase price of \$107,500, and that form was maintained in the books and records of SouthernTrust Bank.

16. On November 17, 2022, the loan proposal was presented to the SouthernTrust Bank board for approval. Cook was aware that the loan details, i.e., a cash down payment of \$21,500 was falsely presented to the board. The board approved the loan for \$86,000 and the loan was funded by SouthernTrust Bank.

So stipulated this 6<sup>th</sup> day of MAY, 2024.



Steven Cook  
Defendant



John Stobbs  
Attorney for Defendant

THE UNITED STATES OF AMERICA



Hal Goldsmith  
Special Attorney to the United States  
Attorney General  
Pursuant to 28 U.S.C., Section 515