# IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)
Plaintiff,	) No. 24-40032- JPG
v.	
STEVEN COOK,	)
Defendant.	<i>)</i> )

### **INFORMATION**

#### THE UNITED STATES ATTORNEY GENERAL CHARGES:

## COUNTS 1 - 3 FALSE ENTRY IN BANK RECORDS

## A. INTRODUCTION

At all times relevant to the Indictment:

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.

#### COUNT 1

2. From on or about March 26, 2022 and continuing through on or about August 12, 2022, both dates being approximate and inclusive, in the Southern District of Illinois and elsewhere, defendant,

## STEVEN COOK,

aided and abetted by one or more other individuals, and with the intent to defraud SouthernTrust Bank and to deceive its Officers, knowingly made or caused to be made one or more false entries in the books, reports, or records of SouthernTrust Bank, in that, in relation to a commercial real estate loan to Lawler and Maze Properties, LLC, 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 the buyer of \$109,030.00 when in truth and in fact, as the defendant well knew, the purchase price was \$436,122.00 and there was no cash downpayment from the buyer. Further, there was a Purchase and Sales Agreement submitted to SouthernTrust Bank which falsely, stated a purchase price of \$545,152.00 when in truth and in fact, as the defendant well knew, the purchase price was \$436,122.00.

In violation of Title 18, United States Code, Sections 2 and 1005.

#### **COUNT TWO**

3. From on or about August 8, 2022 and continuing through on or about August 12, 2022, both dates being approximate and inclusive, in the Southern District of Illinois and elsewhere, defendant,

## STEVEN COOK,

aided and abetted by one or more other individuals, and with the intent to defraud SouthernTrust Bank and deceive its officers, knowingly made or caused to be made one or more false entries in the books, reports, or records of SouthernTrust Bank, in that, in relation to a commercial real estate loan to Lawler and Maze Properties, LLC, a false Credit Approval Form was created by SouthernTrust Bank which falsely stated a purchase price of \$413,000.00, and a cash

downpayment from the buyer of \$82,600.00 when in truth and in fact, as the defendant well knew, the purchase price was \$330,400.00 and there was no cash downpayment from the buyer. Further, there were four (4) Real Estate Purchase Agreements submitted to SouthernTrust Bank which falsely stated a total purchase price of \$413,000.00 when in truth and in fact, as the defendant well knew, the purchase price was \$330,400.00. Further, there was a HUD-1 Closing Statement which falsely stated a seller financing of \$81,631.76 when in truth and in fact, as the defendant well knew, there was no seller financing.

In violation of Title 18, United States Code, Sections 2 and 1005.

### **COUNT THREE**

4. From on or about November 7, 2022 and continuing through on or about November 17, 2022, both dates being approximate and inclusive, in the Southern District of Illinois and elsewhere, defendant,

#### STEVEN COOK,

aided and abetted by one or more other individuals, and with the intent to defraud SouthernTrust Bank and deceive its Officers, knowingly made or caused to be made one or more false entries in the books, reports, or records of SouthernTrust Bank, in that, in relation to a commercial real estate loan to Lawler and Maze Properties, LLC, a false Credit Approval Form was created by SouthernTrust Bank which falsely stated a purchase price of \$107,500.00, and a cash downpayment from the buyer of \$21,500.00 when in truth and in fact, as the defendant well knew, the purchase price was \$86,000.00 and there was no cash downpayment from the buyer. Further, there was a Standard Purchase and Sale Agreement submitted to SouthernTrust Bank which falsely

stated a total purchase price of \$107,500.00 when in truth and in fact, as the defendant well knew, the purchase price was \$86,000.00.

In violation of Title 18, United States Code, Sections 2 and 1005.

Respectfully submitted,

HAL GOLDSMITH

Special Attorney to the United States

Attorney General

Pursuant to 28 U.S.C., Section 515