

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED - GR
June 17, 2024 4:06 PM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY:JMW SCANNED BY: KB.16/18

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TODD MARTIN KREYKES,

Defendant.

1:24-cr-83
Robert J. Jonker
U.S. District Judge

FELONY INFORMATION

_____/

The United States Attorney charges:

(Theft of Government Property)

From in or about April, 2020, to in or about November, 2021, in the Southern Division of the Western District of Michigan, defendant,

TODD MARTIN KREYKES,

knowingly embezzled, stole, purloined, and converted to his use or the use of another, money or a thing of value exceeding \$1,000.00, of the United States or of any department or agency thereof.

Specifically, defendant, a licensed medical professional in the state of Michigan, owned and operated Boardman Family Practice, a rural health center that provided primary care medical services. From in or about April 2020, until in or about November 2021, Boardman Family Practice received over \$294,000.00 from the United States through various federal programs designed to assist medical providers in providing care and treatment for patients during the Covid-19 pandemic, including the CARES Act Provider Relief Fund, CARES Act Rural Health Center Distribution, Rural Health Center Testing Program, and the Rural Health Clinic Vaccine Confidence Program. Defendant accepted these federal payments and attested to the

accompanying terms and conditions that required the funding to be used to prevent, prepare for, and respond to the Covid-19 pandemic, Covid-19 testing and vaccination, or to reimburse the recipient for health care expenses or lost revenues attributable to the coronavirus. Instead, defendant stole over \$200,000.00 of the federal funds and converted them to his own use by spending the federal funds on a new truck, a Harley-Davidson motorcycle, a camper, and other personal items and expenses, remodeling his home, paying off personal loans, and taking vacations, all in violation of the terms and conditions of the federal programs.

18 U.S.C. § 641

FORFEITURE ALLEGATION
(Theft of Public Money)

The allegations contained in Count 1 of this Felony Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of the offense in violation of 18 U.S.C. § 641 set forth in Count 1 of this Felony Information, the defendant,

TODD MARTIN KREYKES,

shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

1. MONEY JUDGMENT: A sum of money equal to at least \$214,222.06, which represents the proceeds traceable to the offense.

2. PERSONAL PROPERTY: The following personal property:

a. the following vehicles or proceeds from any sale of these vehicles:

i. a 2015 Ford Explorer SUV, VIN 1FM5K8D86FGB09895;

ii. a 2013 Ford F-350 Super Duty Crew Pickup, VIN 1FT8W3BT3DEB07854;

iii. a 2017 Harley Davidson Electra Glide Motorcycle, VIN 1HD1KED10HB652677;

b. \$8,647.41 in funds from Huntington Bank Account 610262096.

4. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

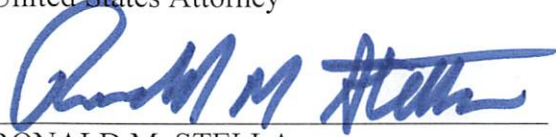
a. cannot be located upon the exercise of due diligence;

- 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 of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)
21 U.S.C. § 853(p)
18 U.S.C. § 641

MARK A. TOTTEN
United States Attorney

A handwritten signature in blue ink, appearing to read "Ronald M. Stella", is written over a horizontal line.

RONALD M. STELLA
DANIEL T. MCGRAW
Assistant United States Attorneys

Date: June 14, 2024