IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

UNITED STATES OF AMERICA

v. CASE NO.: 4:22-cr-32-MW/MAF

FELICIA JACKSON STANLEY
and
WILBERT JEAN STANLEY III
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STATEMENT OF FACTS

The parties agree with the truthfulness of the following factual basis for the Defendant's guilty plea. The undersigned parties further agree that not all of the facts known from this investigation are contained in this brief summary. Defendant admits that, if this case were to proceed to trial, the Government could prove the following facts beyond a reasonable doubt:

The Coronavirus Aid, Relief, and Economic Security ("CARES") Act, Pub. L. 116-136, 134 Stat. 281, was a federal law enacted on or about March 27, 2020, which was designed to provide emergency financial assistance to Americans who were suffering economic harms caused by the COVID-19 pandemic. Two sources of relief provided by the CARES Act were an expansion of the Economic Injury Disaster Loan ("EIDL") program, and the establishment of the Paycheck Protection Program ("PPP").

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CLERK, UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA

Overview of the EIDL Program

The EIDL program was a U.S. Small Business Administration ("SBA") program that provides low-interest loans to small businesses, renters, and homeowners in regions affected by declared disasters. The CARES Act authorized the SBA to provide EIDLs of up to $2 million to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic. In order to obtain an EIDL, a qualifying business must submit an application to the SBA and provide information about its operations, including its number of employees, gross revenues for the 12-month period preceding the disaster, and cost of goods sold in that same period. In the case of EIDLs for COVID-19 relief, that period was specified as the 12-month preceding January 31, 2020. In order to qualify for an EIDL for COVID-19 relief, a business must have been operating during the 12-months preceding January 31, 2020. Businesses created on or after February 1, 2020, were not eligible for an EIDL.

To determine whether an applicant was eligible for an EIDL, and to determine the amount of an EIDL to award an eligible applicant, the SBA relied primarily on the self-reported information provided by the applicant concerning the operations of the small business, including the number of people employed by the business, gross revenues for the 12-month period preceding the disaster, and the cost of goods sold for that same period. The EIDL applicant must have certified that all of the information provided in the application was true and correct to the best of the applicant's knowledge. EIDL proceeds must have been used by the applicant to meet ordinary and necessary financial obligations that cannot be met as a direct result of the disaster, such as payroll costs, salaries, sick leave, production costs, rent, and mortgage payments. The CARES Act also authorized the SBA to issue advances of up to $10,000 to small businesses within three days of applying for an EIDL. The amount of each advance was determined by the number of people employed by the business, as certified by the applicant. These advances of up to $10,000 did not have to be repaid.

Overview of the PPP

The PPP, established by the CARES Act, was an SBA program that provides low-interest, forgivable loans to applicants to help fund qualifying businesses' payroll costs amidst the COVID-19 pandemic. In order to obtain a PPP loan, a qualifying business was required to submit a PPP loan application, which must have been signed by an authorized representative of the business. The PPP loan application required the business, through its authorized representative, to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. One such certification was that the business was in operation on February 15, 2020. Businesses created after February 15, 2020, were <u>not</u> eligible for a PPP loan.

In the PPP loan application, the business, through its authorized representative, must have stated, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures were used to calculate the amount of money the small business is eligible to receive under the PPP. PPP loan applications were processed by a participating lender. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies, which were 100% guaranteed by the SBA. Data from the PPP application, including information about the borrower, the total amount of the loan, and the listed number of employees, was transmitted by the lender to the SBA in the course of processing the loan. PPP loan proceeds were required to be used by the applicant business on certain permissible expenses, including payroll costs, interest on mortgages, rent, and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven if the business spends the loan proceeds on these expense items within a designated period of time after receiving the proceeds, and used a certain amount of the PPP loan proceeds on payroll expenses.

In order to apply for an EIDL or PPP loan, an applicant must have provided a taxpayer identification number for the business, specifically, either an employer identification number ("EIN") (for businesses with employees), or a social security number ("SSN") (for sole proprietorships or independent contractors).

* * *

Investigating agents identified a scheme to defraud involving Wilbert Stanley III (hereinafter "WILBERT") and Felicia Jackson-Stanley (hereinafter "FELICIA"), collectively the "Stanleys" and "Defendants"), in which EIDL applications were filed on behalf of other named individuals regarding multiple businesses using an Internet Protocol ("IP") Addresses[1] assigned by the Internet Service Provider to the Stanleys. These EIDL applications contained materially false information, such as the number of employees and gross revenue for the twelve months preceding the COVID-19 pandemic.

Fraudulent EIDL Scheme Involving FELICIA AND WILBERT

On February 15, 2021, TIGTA reviewed IRS tax records and SBA records related to an individual with the initials of R.P. Records revealed that on July 22, 2020, R.P. accessed an IRS database using IPv6 address 2601:4c1:8203:3e60:b10b:6185:6285:bbe7 (determined to be owned by Comcast Cable Communications, Inc., hereinafter "COMCAST") to apply for an Employee Identification Number (EIN) for the company "[R.P.'s first and last name] Cleaning,

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[1] An IP Address ("Internet Protocol" address) or "IP" is a unique numeric address used by computers on the Internet. An IPv4 address looks like a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). An IPv6 address, the most recent version of the IP, uses a 128-bit address, and is represented as eight groups, separated by colons, of four hexadecimal digits. Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

LLC." The company was assigned EIN ending in 6139. Our investigation also revealed that R.P. incorporated a company called "[R.P.'s first and last name], LLC" in Florida on July 21, 2020. Records also revealed that on June 21, 2020, R.P. accessed an SBA database to apply for an EIDL using COMCAST IP address 2601:4c1:8203:3e60:959a:6402:1cd1:8af7 for the business "[R.P.'s first and last name] Cleaning." This EIDL application was assigned application number 3305707788. The EIDL application falsely certified that "[R.P.'s first and last name] Cleaning" was in business prior to February 1, 2020.

IRS records indicated several SBA EIDLs were issued to various applicants, using similar COMCAST IPv6 addresses as the IPv6 address used for the EIDL application submitted by R.P. Specifically, all of the IPv6 addresses of interest started with the same first four groupings of numbers in the IPv6 address (that is, 2601:4c1:8203:3e60, hereinafter "IP 2601"), which was determined to have been assigned to the Stanleys at their residence. A search of IRS records revealed that R.P. has never submitted any tax filings for the business "[R.P.'s first and last name] Cleaning, LLC" with EIN ending in 6139. Oath Holdings, Inc., (which owns Yahoo!), indicated that, on June 21, 2020, email account [R.P.'s first name][R.P.'s lastname]@yahoo.com was created using IP 2601, using R.P.'s true date of birth. IRS records also indicated several EINs were applied for within an IRS database from IP 2601 and that those EINs were subsequently used on an SBA EIDL application after the eligibility date of February 1, 2020. Therefore, R.P.'s SBA EIDL application, and all other SBA EIDL applications submitted after February 1, 2020, using IP 2601, were false and fraudulent.

On June 1, 2021, search warrants were obtained from Northern District of Florida Magistrate Judge Martin A. Fitzpatrick (case numbers 4:21mj121-MAF, 4:21mj122-MAF, and 4:21mj123-MAF) authorizing a search of email accounts hosted by Oath Holdings, Inc. (which owns Yahoo!), Oath, Inc. (which owns AOL), and Google, Inc. During a search of these records, agents were able to ascertain that several email accounts were created and used shortly thereafter in furtherance of the fraudulent EIDL applications.

Fraudulent EIDL Applications

SBA EIDL applications required an email address to be included in the application because the SBA utilized the applicant's email address for purposes of establishing electronic communications with the applicant. R.P. listed email address [R.P.'s first name][R.P.'s last name]@yahoo.com on her their fraudulent EIDL application. SBA officials and R.P. exchanged several emails between July 6, 2020, to May 9, 2021, in which they discussed the details of R.P.'s EIDL application.

On May 4, 2020, WILBERT applied for an EIN with the IRS for SCREAM LOUD INC using IP 2601, and was assigned EIN ending in 8473 by the IRS. Google, Inc. records indicated that, on the same date, WILBERT established email account screamloudinc@gmail.com using IP 2601, and using his true date of birth and phone number, (850) 519-8858. On the same date, WILBERT completed application number 3000026522 for an EIDL application, using IP 2601, for SCREAM LOUD INC., in which he falsely certified that this business was established on December 1, 2019, had 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) of $40,000, and had twenty-five (25) employees. The application was accepted, but funding was declined due revenue requirements. An advance of $10,000 was also requested, but also was declined due to WILBERT having filed a duplicate application for the same named business.

Google, Inc. records indicated that on May 9, 2020, WILBERT established email account screamloudtally@gmail.com using IP 2601. On the same date, WILBERT completed application number 3000137307 for another EIDL application, using IP 2601, for SCREAM LOUD INC. In this application, WILBERT falsely represented that the business:

a. had an email address of screamloudtally@gmail.com,
b. was established on January 7, 2018,
c. had 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) of $414,000, and
d. had a total of fourteen (14) employees.

However, IRS records revealed that WILBERT filed a tax return for tax year 2019 using an IRS Form 1040 Schedule C, in which he claimed that his business SCREAM LOUD INC (EIN ending in 8473) had a gross income of $277,582.

However, the false EIDL application was accepted and funded for $145,000. An advance of $10,000 was also requested and disbursed to WILBERT. IRS records revealed that WILBERT accessed the Internet from IP 2601 and used email screamloudinc@gmail.com as recently as May 2, 2021.

In September 2017, FELICIA falsely applied for an EIN for YEP SHE KAN NETWORK INC and was assigned EIN ending in 3142 by the IRS. On March 31, 2020, FELICIA completed and submitted SBA application number 3300897691 for an EIDL, using IP 2601 and phone number (850) 322-4725, for YEP SHE KAN NETWORK. In her application, she falsely claimed that her business was established on April 4, 2016, had 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) of $20,000, and had six (6) employees in total. However, the application was accepted and funded for $1,000. In the same false EIDL application, FELICIA requested an advance of $10,000, but was approved for $6,000. On June 17, 2020, FELICIA completed SBA application number 3304957699 using IP 2601 for another EIDL for the same business, YEP SHE KAN NETWORK. This application included different false details about her business, such as the 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) being $360,000, and the business having ten (10) employees. An advance of $10,000 was also requested on the application, but was declined due to multiple advance requests being made relating to duplicate EIDL applications for the same business. FELICIA never submitted any tax filings to the IRS for YEP SHE KAN NETWORK INC (EIN ending in 3142) to report such income.

In March 2018, FELICIA applied for an EIN for BEYOND THE BODY LOUNGE LLC and was assigned EIN ending in 6202 by the IRS. Google, Inc. records indicated that on January 17, 2018, FELICIA established email account beyondthebodylounge@gmail.com using her true date of birth and phone number, (850) 322-4725. According to Google, Inc. records obtained via search warrant (as noted above), Beyondthebodylounge@gmail.com was accessed from the Internet several times using IP 2601 between June 2020 and January 2021. On March 31, 2020, FELICIA completed SBA application number 3300907566 for an EIDL, using IP 2601 and phone number (850) 322-4725, for BEYOND THE BODY LOUNGE LLC. In that application, FELICIA falsely claimed that the business was established on January 16, 2018, had 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) of $40,000, and had one (1) employee. The application was accepted, but funding was declined due to FELICIA having an unsatisfactory credit history. An advance of $10,000 was also requested, but was declined because the SBA could not verify FELICIA's bank account based on the information that she provided in her application.

On May 6, 2020, FELICIA completed SBA application number 3000102649 for another EIDL, using IP 2601, for the same business, BEYOND THE BODY LOUNGE LLC. In this application, FELICIA falsely reported different information than in the March 31, 2020 application, including that the business' 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) was $65,000, and that the business had twelve (12) employees. The application and request for a $10,000 advance were accepted, but funding was declined due to FELICIA having filed a duplicate application for the same named business. FELICIA never submitted any tax filings for BEYOND THE BODY LOUNGE LLC (EIN ending in 6202) reporting such income or employee totals.

In March 2018, FELICIA applied for an EIN for A CALL AWAY TRANSPORTATION and was assigned EIN ending in 0930 by the IRS. On March 31, 2020, FELICIA completed SBA application number 3300858211 for an EIDL using IP 2601 phone number (850) 322-4725, for A CALL AWAY TRANSPORTATION. In this application, FELICIA falsely claimed that the business was established on April 4, 2016, had 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) of $105,000, and had four (4) employees in total. The application was accepted, but funding was declined due to FELICIA having an unsatisfactory credit history. An advance of $10,000 was also requested, but was approved for $4,000.

On June 17, 2020, FELICIA completed SBA application number 3304957063 using IP 2601 for another EIDL for the same business, A CALL AWAY TRANSPORTATION. In this application, FELICIA falsely reported different information than in her March 31, 2020 application, such as the business having 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) of $550,000, and a total of twelve (12) employees. The application and request for a $10,000 advance were accepted, but funding was declined due to FELICIA having filed a duplicate application for the same named business. FELICIA never submitted any tax filings for A CALL AWAY TRANSPORTATION (EIN ending in 0930) to the IRS to report such income.

Between March 2020 and September 2020, approximately 166 SBA EIDL applications were submitted using IP 2601. The following chart summarizes the EIDL applications and grants which were funded by the SBA based on false and fraudulent applications submitted by FELICIA and WILBERT:

	First Name	Last Name	Applicant (Business) Legal Name	Application Date	Application ID	LOAN AMOUNT	NET ADVANCE AMOUNT
1	Felicia	Jackson-Stanley	A Call Away Transportation	2020-03-31	3300858211	$0.00	$4,000.00
2	WILBERT	Stanley	Yep We Kan promotions inc	2020-03-31	3300891943	$150,000.00	$6,000.00
3	WILBERT	Stanley	Play Sports Bar LLC	2020-03-31	3300896960	$150,000.00	$10,000.00
4	Felicia	Jackson-Stanley	Yep She Kan Network	2020-03-31	3300897691	$1,000.00	$6,000.00
5	WILBERT	Stanley	Island Daiquiris Bar & Grill LLC	2020-03-31	3300901128	$40,000.00	$10,000.00
6	WILBERT	Stanley	USA United law firm LLC	2020-03-31	3300904833	$16,000.00	$1,000.00
7	Kallilah	Butler	Unique Xpressions	2020-04-01	3301334073	$18,900.00	$1,000.00
8	WILBERT	Stanley	SCREAM LOUD INC	2020-05-09	3000137307	$145,000.00	$10,000.00
9	GERONE	JACKSON	JACKSON FAMILY PRODUCE	2020-05-11	3000152667	$150,000.00	$10,000.00
10	Wilbert Stanley	Stanley	CREDIT REPAIR & TRADELINES LLC	2020-06-14	3304476681	$42,500.00	$10,000.00

11	Aldrena	Jackson	ALDRENA JACKSON HEALTH	2020-06-14	3304478805	$130,000.00	$0.00
12	Crystal	Jackson	Crystal Jackson	2020-06-16	3304743480	$150,000.00	$0.00
13	Darian	Williams	Darian Williams	2020-06-18	3305318267	$0.00	$10,000.00
14	JEFFERY	PAREMORE	JEFFERY PAREMORE	2020-06-18	3305346228	$0.00	$10,000.00
15	ROSA	WILLIAMS	ROSA WILLIAMS	2020-06-18	3305348458	$0.00	$10,000.00
16	TRAVIS	WALKER	FREIGHT TRAIN	2020-06-18	3305350372	$150,000.00	$10,000.00
17	CEDRIC	WILLIAMS	CEDRIC LAWN SERVICE	2020-06-18	3305352926	$129,000.00	$10,000.00
18	QUANDA	GARY	QUANDA GARY	2020-06-19	3305482320	$150,000.00	$10,000.00
19	DESMOND	WILLIAMS	DESMOND WILLIAMS	2020-06-19	3305485242	$150,000.00	$10,000.00
20	ARMANDO	VERNON	ARMANDO VERNON	2020-06-19	3305503210	$0.00	$10,000.00
21	Jemarius	House	Jemarius House	2020-06-19	3305529377	$0.00	$10,000.00
22	TREYAUN	KELLY	TREYAUN KELLY	2020-06-20	3305543640	$0.00	$10,000.00
23	KENDRICK	KELLY	KENDRICK KELLY	2020-06-20	3305544964	$150,000.00	$10,000.00
24	DENNIS	COLSON	DENNIS COLSON	2020-06-21	3305704803	$150,000.00	$10,000.00

25	ROMELLE	POTTS	ROMELLE POTTS CLEANING	2020-06-21	3305707788	$150,000.00	$10,000.00
26	ORIN	HOLLAND	ORIN HOLLAND	2020-06-21	3305712822	$0.00	$10,000.00
27	Tamora	Baker	Tamora Baker	2020-06-21	3305741200	$0.00	$10,000.00
28	KACEY	ROSS	FAMILY FIRST ASSISTED LIVING LLC	2020-06-21	3305741442	$150,000.00	$0.00
29	MELVIN	PATTERSON	ZELIFIC L.L.C.	2020-06-21	3305742687	$150,000.00	$10,000.00
30	Tracy	Williams	Tracy Williams	2020-06-22	3305783917	$0.00	$10,000.00
31	Leslie	Williams	Leslie Williams	2020-06-22	3305867937	$0.00	$10,000.00
32	RICHANTI	JEFFERSON	RICHANTI JEFFERSON CARE	2020-06-23	3305926102	$135,000.00	$0.00
33	TANISHA	HAMPTON	TANISHA HAMPTON CARE	2020-06-23	3305946407	$95,000.00	$10,000.00
34	Lakeidra	Hamilton	Lakeidra Hamilton	2020-06-23	3305971497	$0.00	$10,000.00
35	Eddie	Carter	Eddie Carter	2020-06-23	3305996512	$44,500.00	$10,000.00
36	Diana	Jones	Diana Jones	2020-06-23	3306040001	$0.00	$10,000.00
37	Mario	Thomas	Mario Thomas	2020-06-23	3306078125	$42,200.00	$10,000.00
38	Sylvia	Engram-Robinson	Sylvia Engram-Robinson	2020-06-24	3306183887	$0.00	$10,000.00
39	Darren	Hinson	Darren Hinson	2020-06-25	3306498225	$70,600.00	$10,000.00
40	Dwight	Aldridge	Dwight Aldridge	2020-06-27	3306985085	$41,300.00	$0.00

41	Jamie	DeMent	Jamie DeMent	2020-07-02	3308389562	$60,300.00	$10,000.00
42	KIERRA	ROBINSON	KIERRA ROBINSON	2020-07-03	3308590626	$0.00	$10,000.00
43	MONDRELL	GARY	MONDRELL GARY	2020-07-03	3308592786	$85,000.00	$10,000.00
44	QUINTON	FREDERICK	QUINTON FREDERICK	2020-07-03	3308595061	$0.00	$10,000.00
45	GREGORY	PHILLIP	GREGORY PHILLIP	2020-07-04	3308604726	$0.00	$10,000.00
46	SHANE	GORDON	SHANE GORDAN	2020-07-04	3308607832	$0.00	$10,000.00
47	LAKEVES	PRATHER	LAKEVES PRATHER	2020-07-04	3308609208	$0.00	$10,000.00
48	MICHAEL	WILLIAMS	MICHAEL WILLIAMS	2020-07-04	3308610170	$0.00	$10,000.00
49	Kenneth	Porter	PORTER CLEANING SERVICE	2020-07-28	3312064871	$139,500.00	$0.00
50	Damisi	Scott	Damisi Scott	2020-07-28	3312066592	$150,000.00	$0.00
						$3,185,800	**$398,000**
		TOTAL FUNDED LOAN AND NET ADVANCE				**$3,583,800**	

For most of the applications submitted (which were not in the names of the Stanleys), the Stanleys had an arrangement with the named applicants to receive a kickback from the named applicants, which constituted a portion of the PPP/EIDL loan and/or grant proceeds.

Fraudulent PPP Loan Scheme Involving FELICIA AND WILBERT

As noted above, on March 31, 2020, WILBERT completed application number 3300891943 for an EIDL from the SBA, using IP 2601, for YEP WE KAN PROMOTIONS INC, in which he falsely certified that this business was established on March 24, 2009, had 12-month gross revenues (prior to the date of the January 31, 2020 Disaster) of $1,202,100, and had six (6) employees. The application was accepted and funded for $150,000. In the same EIDL application, he requested an advance of $10,000, but was approved for $6,000.

However, on May 22, 2020, WILBERT completed a PPP loan application with Kabbage, Inc. for YEP WE KAN PROMOTIONS INC, in which he falsely certified that his business had an average monthly payroll of $8,334, and had one (1) employee. The application was accepted and funded for $20,833 (SBA Loan Number 1691627801) based on the false representations of WILBERT. Within the application, WILBERT submitted a false IRS Form 1040 - Schedule C and an IRS

Form 1120-S, claiming that the Gross Income for the business for 2019 was $679,108.

WILBERT filed his personal 2019 Federal tax return on April 13, 2021. Within that 2019 Federal tax return, WILBERT claimed YEP WE KAN PROMOTIONS INC had Gross Profit and Gross Income of $1,415,963. WILBERT did not submit an IRS Form 1120-S to the IRS for YEP WE KAN PROMOTIONS INC for tax year 2019, despite WILBERT having included an IRS Form 1120-S for YEP WE KAN PROMOTIONS INC as a supporting document to Kabbage, Inc. for his PPP loan application. The IRS Form 1040 - Schedule C that WILBERT eventually filed for his 2019 Federal tax return was filed in 2021 with the IRS; however, WILBERT attached the IRS Form 1040 - Schedule C to his PPP loan application in May of 2020. Simply put, WILBERT willfully misrepresented his income in his PPP loan application by using tax forms that had not been submitted to the IRS at the time of the PPP loan application.

On June 18, 2020, FELICIA completed a PPP loan application with Kabbage, Inc. for A CALL AWAY TRANSPORTATION LLC, having an EIN ending in 0930, in which she falsely certified that:

a. A CALL AWAY TRANSPORTATION had an average monthly payroll of approximately $8,320;

b. A CALL AWAY TRANSPORTATION had 1 employee;

c. all SBA loan proceeds will be used only for business-related purposes as specified in the loan application and consistent with the Paycheck Protection Program Rule;

d. A CALL AWAY TRANSPORTATION was in operation on February 15, 2020, and had employees for whom it paid salaries and payroll taxes or paid independent contractors, as reported on Form(s) 1099-MISC;

e. Current economic uncertainty made the SBA PPP loan necessary to support ongoing operations of A CALL AWAY TRANSPORTATION;

f. the SBA PPP loan funds will be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments, as specified under the PPP Rule; and

g. the information provided in the SBA PPP loan application and the information provided in all supporting documents and forms was true and accurate in all material respects.

In her application, FELICIA falsely represented that A CALL AWAY TRANSPORTATION had an average monthly payroll of $8,320, and had one (1) employee. The application was accepted and funded for $20,800 (SBA Loan Number 3686117904) based on these false representations of FELICIA. As part of the fraudulently PPP application, FELICIA submitted a false IRS Form 1040 - Schedule C, claiming that the Gross Income of A CALL AWAY TRANSPORTATION for 2019 was $148,656. IRS records indicated that FELICIA filed her personal 2019 Federal tax return on February 25, 2020 in which FELICIA claimed that she had Gross Profit and Gross Income of $17,520 for an unnamed transportation business. IRS records also indicated that FELICIA did not submit a separate tax return for A CALL AWAY TRANSPORTATION LLC. The IRS Form 1040 - Schedule C that FELICIA filed on her tax return to the IRS in 2020 was not submitted as a supporting document for her June 2020 PPP loan application. Rather, a different version of the IRS Form 1040 - Schedule C was submitted to Kabbage, Inc as a supporting document. Simply put, FELICIA filed her taxes in February 2020, then in June 2020, she submitted an entirely different version of the IRS Form 1040 - Schedule C, in which she willfully misrepresented her income to Kabbage, Inc. on the PPP loan application.

The following chart summarizes the PPP applications, which were funded by various PPP-participating financial institutions (and which were federally-guaranteed by the SBA), and lender fees (which were paid by the SBA), based on false and fraudulent applications submitted by FELICIA and WILBERT:

	Primary Borrower Name	**Lender Name**	**Funded Date**	**Loan Number**	**Original Approved Amount**	**Lender Fee**
1	YEP WE KAN PROMOTIONS INC	Kabbage, Inc.	5/21/2020	1691627801	$20,833.00	$1,041.65
2	A Call Away Transportation LLC	Kabbage, Inc.	6/13/2020	3686117904	$20,800.00	$1,040.00
3	Play Sports Bar LLC	Wells Fargo Bank, NA	5/8/2020	4039557404	$20,833.00	$1,041.65
4	YOU HURT INC	First Home Bank	6/29/2020	6199768010	$8,000.00	$0.00
5	YEP WE KAN PROMOTIONS INC	Cross River Bank	6/8/2020	9589427800	$19,998.00	$0.00

6	Gregory Phillip	Readycap Lending, LLC	5/18/2021	2977759002	$23,900.00	$2,500.00
7	ALBERT GASKINS	BSD Capital, LLC dba Lendistry	6/21/2020	1299548008	$20,833.00	$2,500.00
8	ARMANDO VERNON	Itria Ventures LLC	2/19/2021	1645068500	$20,833.33	$0.00
9	Jaquaez Bess	Kabbage, Inc.	6/22/2020	1715068006	$20,833.00	$1,041.65
10	JACARION STANLEY	Kabbage, Inc.	6/23/2020	1735088009	$20,833.00	$0.00
11	JASON JEFFERSON	Kabbage, Inc.	6/23/2020	1756098000	$20,833.00	$1,041.65
12	QUANDA GARY	Itria Ventures LLC	2/19/2021	2006018505	$20,833.33	$0.00
13	DESMOND WILLIAMS	Kabbage, Inc.	6/29/2020	5568188004	$20,833.00	$1,041.65
14	Albert Gaskins	Capital Plus Financial, LLC	5/22/2021	5789389005	$20,833.00	$2,500.00
15	JACARION STANLEY	Kabbage, Inc.	7/20/2020	6076068110	$20,833.00	$0.00
16	DESMOND WILLIAMS	Kabbage, Inc.	2/3/2021	2058128407	$20,833.00	$2,500.00
17	EMPERIAL DESIGNS LLC	Kabbage, Inc.	6/29/2020	6118648008	$20,833.00	$1,041.65
18	Richanti Jefferson	Fountainhead SBF LLC	5/2/2021	6501238910	$19,609.00	$2,500.00
19	Jaiven Stanley	Harvest Small Business Finance, LLC	4/20/2021	6868678800	$20,833.00	$2,500.00
20	Adrian Colson	Capital Plus Financial, LLC	4/7/2021	8585938707	$20,832.00	$2,500.00
					$404,801.66	**$24,789.90**
	TOTAL FUNDED PPP LOANS AND LENDER FEES:				**<u>$429,591.56</u>**	

Fraudulent SVOG Scheme Involving WILBERT

The Shuttered Venue Operators Grant ("SVOG") program was established by the Economic Aid to Hard-Hit Small Businesses, Nonprofits, and Venues Act, and amended by the American Rescue Plan Act. The program included over $16 billion in grants to shuttered venues, to be administered by SBA's Office of Disaster Assistance. The SVOG program's mission is to support the ongoing operations of eligible live venues and operators, live venue promoters, theatrical producers, talent representatives, live performing arts organization operators, museums, and motion picture theaters during the uncertain economic conditions caused by the COVID-19 pandemic. Eligible applicants could qualify for grants equivalent to 45% of their gross earned revenue, with the maximum amount available for a single grant award of $10 million. SVOG provided emergency assistance for eligible performing arts businesses affected by COVID-19. SVOG applications were received in and processed using computer servers located outside of the state of Florida.

WILBERT specifically attempted to cause and successfully caused the SBA to issue SVOGs and disburse SVOG proceeds to him based upon grant applications, supporting documents, and emails that he falsely represented revenues for Yep We Kan Promotions, Inc., PlaySports Bar, LLC, and Scream Loud, Inc. Specifically, in May 2021, WILBERT falsely stated in his SBA SVOG application that he submitted to the SBA to obtain an SBA SVOG for Play Sports Bar, LLC, that:

a. Play Sports Bar, LLC, having an EIN ending in 4134, had gross revenue of $6,001,000.00 in year 2019,
b. Play Sports Bar, LLC, having an EIN ending in 4134, had gross revenue of $1,000,000.00 in year 2020,
c. Play Sports Bar, LLC, having an EIN ending in 4134, had 44 employees,

d. all SVOG grant proceeds will not be used for real estate purchases or to invest, and
e. the information provided in the SBA SVOG application and the information provided in all supporting documents and forms was true and accurate in all material respects.

These representations were contrary to information contained in tax returns filed with the IRS for Play Sports Bar, LLC. Based on this false application, the SBA paid WILBERT approximately $200,000 in the form of an SVOG for Play Sports Bar, LLC.

The following chart summarizes the fraudulently-obtained (or attempted) SVOG proceeds based on fraudulent SVOG applications submitted to the SBA by WILBERT:

	Grant Application Number	**Date**	**Business Name**	**Requested Amount**	**Total Disbursed (Funded)**
1	SBAHQ21SV012263	5/14/2021	YEP WE KAN PROMOTIONS INC	$204,300.00	$204,300.00
2	SBAHQ21SV015934	8/5/2021	SCREAM LOUD INC	$1,065,000.00	$0.00
3	SBAHQ21SV016946	8/20/2021	PLAY SPORTS BAR LLC	$2,090,250.00	$785,569.95
			TOTAL	**$3,359,550.00**	**$989,869.95**

Identification of the STANLEY's Home and Vehicles

COMCAST provided subscriber information for IP 2601, which indicated that internet services, using IP 2601, were provided at 5001 Lake Front Dr., Apt M6, Tallahassee, FL 32303-7174, between on or about August 26, 2020, and November 2, 2020, to FELICIA as the subscriber/customer. The Leon County (Florida)

Property Appraiser's website indicates that FELICIA purchased the residence located at 3770 Laurel Trace Way, Tallahassee, FL 32303 on October 28, 2020. Records from COMCAST also indicated that internet services, using IP 2601, were provided at the 3770 Laurel Trace Way, Tallahassee, FL 32303 between on or about November 8, 2020, and February 18, 2021, and between on or about March 20, 2021, and September 8, 2021, to FELICIA as the subscriber/customer.

Interviews of PPP/EIDL Applicants

The following are some of the applicants who received SBA proceeds (described in the charts above) and whose applications were linked to Felicia and Wilbert (by IP address and otherwise):

Desmond Williams ("Williams") was interviewed by agents. He advised that he started his business, Des Will Co., during the pandemic. Des Will Co. started out as a consulting business but later evolved into a car rental business. Williams stated the types of cars people want to rent typically are not offered by a traditional car rental service. Williams received an SBA loan and a PPP loan. Williams received funds from the SBA on two occasions: the first sum, $10,000, was an advance, and the second sum, approximately $150,000, was a grant from the SBA. Williams said he got in touch with an individual named Will (a/k/a WILBERT) through Williams' friend Jeffery Paremore (hereinafter "Paremore"), who told Williams that Paremore could put Williams in touch with someone, WILBERT, who could get Williams a grant to start a business. Williams spoke with "Will" on the phone at which time Will stated he could help Williams get a grant. Will stated Williams had to pay Will either a percentage or a flat fee, which was dependent on how much money Williams received. Through text messages, Williams provided Will with his name, date of birth, social security number, address, a copy of his driver's license, and a copy of his social security card. Williams provided the information through 10 text messages to Will. Williams no longer has these text messages exchanged with Will but confirmed that Will's telephone number was 850-519-8858 (which, as noted above, is the phone number for WILBERT).

After providing his information to Will, Williams then received a call from Will at which time, Will stated that Williams would receive a direct deposit to his account in a couple days. Will stated he applied for a grant for Williams. Then Will informed Williams that he could apply for an SBA loan on behalf of Williams that could be used to start a business. Williams said that would be perfect. After receiving approximately $150,000 (EIDL) from the SBA, Will then informed Williams he could receive a PPP loan. Williams told Will he heard people were being locked up for receiving PPP loans and asked if this was anything like he had saw on the news. Will stated it was not because the people who were arrested were saying they had many employees and that for the PPP loan Williams was his only employee. In addition to his personal information, Williams provided Will with his business information for Des Will Co. Williams was instructed to pay Paremore for the deposits he received from SBA. For each of the payments Williams believes he paid Paremore with cash, CashApp or Zelle. Williams does not know if Paremore received a portion of the funds. Williams understood that the payments to Will were for applying for the funding on Williams behalf. Williams does not recall how much money he paid as a fee for the initial $10,000 deposit from the SBA. Williams paid Paremore approximately twenty percent or $30,000 for the second deposit from the SBA for approximately $150,000 in total. Williams paid Paremore approximately $5,000 or $10,000 for the PPP loan funds Williams received. Williams never told Will that he had a business with thirteen employees, gross revenues of $1.2 million or cost of goods sold of $800,000. Williams was unaware that information was listed on an application in Williams' name. Williams never saw any paperwork regarding his SBA funds or PPP loan. Williams' business telephone number for Des Will Co is 800-506-5717; however, the phone number listed on the three SBA loan applications, 800-506-5771, is not correct. Williams' personal cell phone number is 404-934-7034. Williams does not use the email address desmondwilliamsusa@gmail.com. Williams did not provide the email address desomondwilliamsusa@gmail.com to Will and was not aware the email address was listed on the applications.

Travis Walker ("Walker") was interviewed by agents and advised that he had a logistics business called Freight Train, which was in business approximately six months prior to February 2020. Walker obtained the SBA EIDL loan in order to obtain a box truck for his business. Walker also bought $80,000 in bitcoin with the SBA EIDL loan he received. Walker also used the EIDL proceeds to have his former girlfriend's floors in her house remodeled for approximately $10,000. Walker advised that he obtained the SBA EIDL loan through his friend Wilbert Stanley ("WILBERT"). Walker has known WILBERT since approximately the ninth grade. WILBERT told Walker that he could get a loan to help with Walker's business. Walker provided WILBERT with his address, social security number, date of birth, driver's license and bank statement. Walker believes he provided the information to WILBERT over the phone but may have texted his bank statement and driver's license to WILBERT. Walker did not provide his income or expenses or tax returns to WILBERT. Walker did not tell WILBERT how many employees he had; however, Walker had approximately three employees to include himself. Walker never paid the employees because he never made a profit. Walker never purchased a box truck either. Walker was trying to set up the trucking company in order to work for Amazon. WILBERT told Walker the loan could be used to obtain trucks and the loans were for individuals to make more money so they could pay more taxes.

Walker received an advance from the SBA, an SBA EIDL loan, and a PPP loan. WILBERT used the information Walker provided, which he previously described, to obtain the loans. Walker paid WILBERT approximately $10,000 via Zelle for WILBERT's assistance in obtaining the money. Walker does not recall if he sent the money to WILBERT directly or to Yep We Kan Promotions. WILBERT never explained the difference between the PPP loan, SBA advance, and SBA EIDL loan. Walker ultimately received a $10,000 EIDL advance, a $149,900 EIDL loan and a $20,833 PPP loan. Walker is also friends with Williams' friend Jeffery Paremore ("Paremore"). Walker went to Godby High School in Tallahassee, FL and Paremore went to Leon High School in Tallahassee, FL. Paremore may have told WILBERT or Walker to talk to each other about the loans. Walker recalls receiving a call from WILBERT at which time WILBERT spoke about the loans and how he could help Walker. Walker was asked about the $37,000 he provided to Paremore. Special Agent Evans (hereinafter "SA Evans"), while interviewing Walker, explained to Walker that he should not lie to agents just to tell the same story he may have told a bank. SA Evans stated it was a crime to lie to a federal agent. SA Evans stated the agents were aware that after Walker sent $37,000 to Paremore, that within a short time frame, Paremore sent $34,000 to WILBERT, and if not for the initial $37,000, Paremore would not have had the funds to send to WILBERT. Walker stated the money he provided to Paremore was for a truck; however, after the interview, Walker admitted to SA Evans that he had lied and that the $37,000 Walker paid to Paremore was in fact intended for WILBERT as part of Walker's fee for WILBERT obtaining the loan for Walker. Walker later advised that he was instructed to send the money to Paremore and was told at the time it was for WILBERT helping Walker. During the interview, Walker stated that he never saw the SBA applications and did not complete the applications himself. Walker's business did not have gross receipts of $1.3 million and sixteen employees in 2019. Walker also advised that he never used the email address BoxerTravisWalker@gmail.com (which was on the application).

Damisi Scott ("Scott") was also interviewed by agents. Scott said that he did apply for an SBA EIDL loan through someone in Tallahassee, FL (he did not recall the person's name, but based on bank deposits noted above, it was Wilbert Stanley). The individual was a male who also owned a restaurant in Tallahassee, FL, and also owned Yep We Kan. Scott believed that the SBA EIDL loan he received was for his trucking company. Scott started his business in 2021. Scott did not own or operate a business in 2019 or 2020. Scott provided his full name, social security number, mailing address and bank account information to the individual who applied for the loan on Scott's behalf. Scott believes he also provided his bank account information at First Commerce Bank. Scott did not provide anyone with his gross receipts, cost of goods sold or the number of employees the business had. Scott does not have any employees. Scott was asked if either of his businesses had gross receipts of $654,000 in the previous year (as reported on the SBA EIDL application); Scott stated his gross receipts were nowhere near that. Scott was asked if he had eight employees or told anyone he had eight employees; Scott stated no. Scott is not aware of nor has he ever used the email address DamisiScott850@gmail.com (as reflected on the SBA EIDL application). Scott stated the individual who applied for the loan must have created it because he was unaware of it. Scott did not receive any emails from the SBA.

Scott believes he was charged $40,000 for the SBA EIDL loan. Scott paid $15,000 to Kelvin Musgrove ("Musgrove"), who is Scott's friend and who told Scott about the individual who did loans for people. Scott believes that he paid Yep We Kan in addition to the money paid to Musgrove. Scott believes he provided Musgrove $10,000 in cash in order to pay the individual who helped Scott with the loan. When Scott was asked about two $5,000 transfers from Scott's bank account to Yep We Kan, Scott clarified his earlier statement regarding cash withdrawals (for $10,000) and stated that he wire transferred the money because he was out of town. The total amount Scott paid for the loan was approximately $40,000, which consisted of the $15,000 check paid to Musgrove, a $15,000 check to Yep We Kan, and the two $5,000 wire transfers to Yep We Kan.

Romelle Potts ("Potts") was interviewed by agents. Potts advised that she, Antonio Long ("Long") and WILBERT met at Longhorns to discuss the loan prior to receiving the SBA EIDL loan. WILBERT assured Potts that "white people do this all the time" and that Potts just needed to have a business to qualify. WILBERT did not instruct Potts to register a business with the state but stated it would be better if Potts had one. Potts did not register a business with the state at WILBERT's direction. WILBERT told Potts the funds could be used to start a business and the money from the SBA was just a business loan. Potts asked if it was a PPP loan at the meeting because she had saw negative news concerning PPP loans. Potts recalls seeing a rapper get in trouble about a PPP loan and asked Long to make sure the loan Potts received was not a PPP loan. Potts never provided a copy of her social security card to WILBERT. Potts does not recall if she took a picture of her driver's license, but said she may have texted her personal information such as date of birth, social security number and bank account information to WILBERT. After receiving the loan, WILBERT said Potts should invest in WILBERT's business. Potts ultimately invested in WILBERT's business, which she was led to believe, meant she had ownership in the Island Restaurant in Tallahassee, FL. Potts has eaten at the restaurant, did not have to pay, and assumed it was because she was an investor. After Potts received the SBA loan, WILBERT came to Potts' house and the two of them met alone outside while Long remained inside the house. Potts brought her checkbook outside for the meeting. WILBERT instructed Potts to write the two checks for the listed amounts and to make the checks payable to Yep We Kan

Promotions (Check #101, $25,000) and Play Sports Bar (Check #102, $25,000). While one of the checks was for investing in WILBERT's restaurant business; the other check was for an investment in the racing business associated with Long.

Potts has never received a payment for her purported investment in WILBERT's business. WILBERT claimed that he had an employee steal from the business and that Covid has negatively affected the business, thus he cannot pay Potts a return on her investment. Potts met WILBERT's wife "Lecia" (known to the federal agents as FELICIA). Potts said that she sent $5,000 to FELICIA on June 26, 2020, and $10,000 on June 23, 2020, via Cash App. Potts believes Long instructed Potts to send the money to FELICIA for racing events and it could have been for a racing event on July 4, 2020. In addition to the investments with WILBERT, Potts decided to use the funds to invest in Long's racing events. Potts also attends the events and works at the events. Due to Covid and some events being rained out the events have not been profitable. Potts is upset at not receiving any payment from the racing events.

Potts advised that she registered the business Romelle Potts LLC with the State of Florida because she was told not everything from Pennsylvania would transfer to Florida. Potts never received any paperwork, such as requests for hazard insurance from the SBA. Potts did receive something for Romelle Potts Cleaning LLC. Potts thought it was a scam and gave it to Long to ask WILBERT if it was a scam. When Long called WILBERT, WILBERT informed Long the letter was a scam. Potts never had a cleaning business. Potts' businesses have always involved makeup. Romelle Potts LLC was set up for Potts investments in the racing business. Potts applied for an EIN number in 2020. Potts has never operated a pet cleaning business. Potts was provided with a copy of an invoice submitted to the SBA (for the EIDL application) for pet cleaning services provided to a customer Antonio Long. Potts did not create the receipt and never saw the receipt until the agents showed her a copy at the interview with the federal agents. Potts' business does not employ seventeen (17) people and never has.

Federal agents met with and interviewed **Lakeidra Hamilton ("Hamilton")**. In addition to her work at the juvenile detention center, Hamilton started a hair business in February 2021. Hamilton's email address is adoreekeicollection@gmail.com, and she does not use the email lakeidrahamilton97@yahoo.com (on the SBA EIDL application in her name) and was not aware of the email address prior the agents' questioning. Hamilton only uses a Gmail address and has never used Yahoo. Hamilton has never had the phone number 491-5056 (on the SBA EIDL application). Hamilton advised that she received a loan from the SBA. Hamilton texted her information to a woman; she believed it was FELICIA, but could not recall. Hamilton sent the woman her full name, social security number, birthday, copy of her driver's license and perhaps a copy of her bank statement. Hamilton had to provide the woman with half the loan amount Hamilton received as payment. The woman told Hamilton she would receive a loan amount up to $20,000. Hamilton was referred to the woman by Raven Faulk (Faulk). The woman told Hamilton she could get Hamilton a loan and Hamilton could use the money to start a business. The woman called Hamilton to tell Hamilton she received the loan and at that time told Hamilton that she had to pay the woman half of the loan amount as payment. Hamilton was told the money should have been deposited and the woman asked when Hamilton was going to pay her. The woman never told Hamilton she had to pay a fee prior to being notified she was approved for the loan. The woman said Hamilton would receive two payments so Hamilton had to make two payments to her; Hamilton withdrew the money in cash on several occasions and physically delivered the funds to the woman. Hamilton does not recall where the payments were made, what car the woman drove or if anyone was with her. Hamilton made several payments because First Commerce would not let Hamilton withdraw more than $500 at a time. The woman never told Hamilton she had to pay the money back. Hamilton does not have and has never had eleven employees. Hamilton did not have gross receipts of $124,997 or cost of goods sold of $13,555. Hamilton did not even have a business in 2019. Hamilton did not provide the aforementioned information to the woman who obtained the loan for Hamilton. Hamilton never received any paperwork for the loan.

Cedric Williams (**"Cedric"**) was interviewed by agents. Cedric, a TSA employee, stated he was contacted by WILBERT, who told him about a free grant if Cedric had good credit. Cedric provided his social security number, other personal identification, and bank account information to WILBERT. Cedric stated that he never saw or received any paperwork, but received what he thought to be a $10,000 grant. Cedric gave WILBERT $5,000 as a fee. After Cedric received the $10,000, WILBERT contacted him again to tell Cedric that he was eligible for a loan. WILBERT completed the SBA EIDL application for "Cedric Lawn Service" (which did not exist and did not have revenue or cost of goods sold, and did not have any employees). The email address on the SBA EIDL application (williamscedric742@gmail.com) was created by WILBERT and Cedric advised that he did not have access to that account. After receiving the SBA EIDL funds ($129,000), Cedric gave WILBERT $40,000 (roughly 1/3) in cash as a fee. Cedric also reported that WILBERT offered to obtain a grant and loan for Cedric's wife, but they declined.

Dennis Colson (**"Colson"**) was interviewed by agents and advised that he has known WILBERT since middle school. Colson was the manager of a car wash and owns a car detailing business, but did not have any employees associated with his business. WILBERT asked Colson if he would receive money in his (Colson's) bank account because WILBERT claimed he did not trust his business partners who were forcing him out of the business. Colson agreed and provided WILBERT with his name, phone number, and bank account information. WILBERT allowed Colson to keep half of the money. Colson recalled receiving $150,000 in his bank account and that WILBERT had called him to alert him to the deposit. WILBERT met with Colson where Colson gave WILBERT two cashier's checks – one for $30,000 and one for $20,000. Colson advised that he later checked his credit report and saw a loan in his name. Colson advised that he was not aware of the loan nor did he give permission to WILBERT to apply for a loan in his name. The email address used on the SBA EIDL application in Colson's name (denniscolsonusa@yahoo.com) was not one that Colson recognized or used.

Darren Hinson (**"Hinson"**) was interviewed by agents. He advised that he knew FELICIA as Hinson was the business owner of Island Seafood, a restaurant in Tallahassee, FL, and that FELICIA had helped him obtain a government loan. Hinson advised that he gave Felicia his personal identification information, and FELICIA told Hinson that the money would be coming soon. Hinson was never told the details of the loan application, and he never told Felicia any details about his business income or number of employees. After the loan was processed ($72,000), Felicia contacted Hinson to obtain payment for assisting Hinson with obtaining the loan; Felicia wanted $15,000. Hinson said that if he knew he had to pay Felicia $15,000, he would have never got the loan. Hinson said he did not recognize the email address on the SBA EIDL loan application (darrenhinson68@yahoo.com) and that he used Gmail.

* * *

In total, the following chart summarizes the actual and intended loss amounts attributable to both FELICIA and WILBERT for the three SBA benefit programs (PPP, EIDL, and SVOG):

	Actual		**Intended**
EIDL	$3,583,800.00		$3,583,800.00
PPP	$293,471.00		$404,801.66
SVOG	$989,869.95		$3,359,550.00
Total	$4,867,140.95		$7,348,151.66
PPP Lender Fees	$24,789.90		
TOTAL LOSS	**$4,891,930.85**		**$7,348,151.66**

* * *

Money Laundering Transactions

The following chart summarizes the monetary transactions involving at least $10,000 of fraudulently-obtained loan proceeds obtained through the fraud scheme described above, each of which would constitute a separate charge pursuant to 18 U.S.C. § 1957:

TYPE	**DATE**	**PAYEE/PAYOR**	**TRANS AMOUNT**
Check	6/11/2020	PLAY SPORTS BAR LLC	$40,010.00
Debit	6/16/2020	ROBINHOOD	$11,876.00
Deposit	6/18/2020	GERONE JACKSON - FCCU	$139,900.00

Wire	6/23/2020	JEFFERY L PAREMORE - PNC	$11,300.00
Wire	7/7/2020	JEFFERY L PAREMORE - PNC	$34,000.00
Transfer	7/9/2020	TD AMERITRADE	$20,000.00
Transfer	7/10/2020	FELICIA JACKSON STANLEY - PSB	$20,000.00
Deposit	7/15/2020	DENNIS COLSON JR - FCCU	$30,000.00
Deposit	7/15/2020	DENNIS COLSON JR - FCCU	$20,000.00
Deposit	7/24/2020	ROMELLE J POTTS – PSECU	$25,000.00
Deposit	7/24/2020	ROMELLE J POTTS – PSECU	$25,000.00
Check	7/27/2020	RAYBOUN MULLIGAN PLLC	$217,335.41
Debit	8/3/2020	COINBASE	$15,000.00
Check	8/10/2020	YEP WE KAN PROMOTION - WF	$20,000.00
Deposit	8/24/2020	DAMISI M SCOTT – FCCU	$15,000.00
Transfer	9/29/2020	TRANSFER REQUESTED BY FELICIA	$19,829.59
Check	10/28/2020	SMITH THOMPSON SHAW COLON & POWER PA	$15,767.87
With	10/19/2021	CASH WITHDRAWAL	$15,000.00
Transfer	10/20/2021	YEP WE KAN PROMOTION - WF	$50,000.00
Debit	10/20/2021	COINBASE	$12,900.00
With	10/21/2021	CASH WITHDRAWAL	$50,000.00
With	10/22/2021	CASH WITHDRAWAL	$100,000.00
Debit	10/26/2021	ROBINHOOD	$50,000.00
With	10/27/2021	CASH WITHDRAWAL	$50,000.00
With	11/8/2021	CASH WITHDRAWAL	$20,000.00
			$1,027,918.87

ELEMENTS OF THE OFFENSE

I. Conspiracy to Commit Wire Fraud - 18 U.S.C. § 1349 (Count 1)

Conspiracy elements to be proven beyond a reasonable doubt:

(1) two or more persons, in some way or manner, agreed to try to accomplish a common and unlawful plan to commit wire fraud, as charged in the indictment; and

(2) the Defendant knew the unlawful purpose of the plan and willfully joined in it;

Adapted from 11th Circuit Pattern Jury Instructions § O54.

Wire Fraud elements:

(1) the Defendant knowingly devised or participated in a scheme to defraud, or to obtain money or property by using false pretenses, representations, or promises;
(2) the false pretenses, representations, or promises were about a material fact;
(3) the Defendant acted with the intent to defraud; and
(4) the Defendant transmitted or caused to be transmitted by wire some communication in interstate commerce to help carry out the scheme to defraud.

11th Circuit Pattern Jury Instructions § O51.

II. Money Laundering Conspiracy - 18 U.S.C. § 1956(h), 1957 (Count 2)

Conspiracy elements to be proven beyond a reasonable doubt:

(1) two or more people agreed to try to accomplish a common and unlawful plan to violate 18 U.S.C. Section 1957; and
(2) the Defendant knew about the plan's unlawful purpose and voluntarily joined in it.

11th Circuit Pattern Jury Instructions § O74.5.

Money Laundering (1957) elements to be proven beyond a reasonable doubt:

(1) the Defendant knowingly engaged or attempted to engage in a monetary transaction;
(2) the Defendant knew the transaction involved property or funds that were the proceeds of some criminal activity;
(3) the property had a value of more than $10,000;
(4) the property was in fact proceeds of wire fraud; and
(5) the transaction took place in the United States.

11th Circuit Pattern Jury Instructions § O74.6.

III. False Statements - 18 U.S.C. § 1001 (Counts 3-4)

Elements to be proven beyond a reasonable doubt:

(1) The Defendant [made the statement] [made or used the document], as charged;
(2) The [statement] [document] was false;
(3) The falsity concerned a material matter;
(4) The Defendant acted willfully, knowing that the [statement] [document] was false; and
(5) The [false statement] [false document] was made or used for a matter within the jurisdiction of a department or agency of the United States.

11th Circuit Pattern Jury Instructions § O36.

Robert Alex Morris
Attorney for Defendants

7/29/22
Date

Felicia Jackson Stanley
Defendant

7/29/22
Date

Wilbert Jean Stanley III
Defendant

07-29-22
Date

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7/29/2022
Date