U.S DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA
FILED MAR 18 2026
CLERK

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR WIRE FRAUD
AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA	:	CRIMINAL NO. 26- cr-25-BAJ-EWD
	:	
	:	18 U.S.C. § 1343
versus	:	18 U.S.C. § 981(a)(1)(C)
	:	21 U.S.C § 853(p)
	:	28 U.S.C. § 2461(c)
KEERRIA ANDERSON	:	

THE UNITED STATES ATTORNEY CHARGES:

At all times relevant to this Bill of Information:

1. Defendant, **KEERRIA ANDERSON,** was a resident of Baton Rouge, Louisiana within the Middle District of Louisiana.

2. **ANDERSON** was a full-time United States Postal Service employee.

3. Financial Lender 1 was an SBA-approved lender based in Laguna Hills, California.

4. Financial Lender 2 was an SBA-approved lender based in Bedford, Texas.

5. Bank 1 was a financial institution domiciled in Baton Rouge, Louisiana. **ANDERSON** maintained an account ending in x7583 (Acct. x7583) at Bank 1.

COVID-19 Disaster-Relief Programs

6. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or around March of 2020 and designed to provide emergency financial assistance to millions of Americans who were suffering the economic effects of the COVID-

19 pandemic. The CARES Act provided relief to small businesses through the Paycheck Protection Program ("PPP") and the expansion of the Economic Injury Disaster Loan ("EIDL") Program.

Paycheck Protection Program

7. The PPP was administered by the Small Business Administration ("SBA") and provided forgivable loans to small businesses for job retention and certain other expenses. The PPP permitted participating third-party lenders to approve and disburse SBA-backed PPP loans to cover payroll and other expenses incurred by qualifying businesses during, and resulting from, the COVID-19 pandemic. PPP loans were fully guaranteed by the SBA.

8. To obtain a PPP loan, a qualifying business had to submit a PPP loan application, which was 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, including that the business was in operation and either had employees for whom it paid salaries and payroll taxes or paid independent contractors. A business applying for a PPP loan was required to provide documentation showing its payroll expenses, such as filed federal income tax documents.

9. PPP loan applications were electronically submitted by the borrower to a third-party SBA-approved lender, like Financial Lenders 1 and 2. Once approved, the business received the PPP loan proceeds via an electronic funds transfer from the third-party lender to a financial account provided by the business in its PPP application documents.

10. The proceeds of a PPP loan were to be used for certain specified items, such as payroll costs, and were not permitted to be used by the borrower for personal expenses.

Economic Injury Disaster Loan Program

11. The CARES Act expanded an existing disaster-related program, the EIDL program, to provide loan assistance for small businesses and other eligible entities. EIDL proceeds could be used to pay fixed debts, payroll, accounts payable, and other necessary financial obligations that could not be met as a direct result of the disaster. Eligible applicants could also request and receive immediate advances of up to $10,000, which did not have to be repaid.

12. EIDL funds were issued directly from the United States Treasury, and applicants could apply through the SBA via an online portal and application. The loan application required the applicant to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain funds. The application required the applicant to provide information about the business, such as the number of its employees and its gross revenues for the 12-month period prior to the date of the disaster. Applicants were required to certify that the information provided in their applications was true and accurate, and applicants were warned that any false statement or misrepresentation to the SBA may result in sanctions, including criminal penalties.

The Scheme to Defraud

13. Beginning in or around July 2020, and continuing until at least October 2021, in the Middle District of Louisiana and elsewhere, the defendant, **KEERRIA ANDERSON,** devised and intended to devise, a scheme and artifice to defraud the United States, through the SBA, Financial Lender 1, and Financial Lender 2, by filing false and fraudulent applications for pandemic-related funds.

Purpose of the Scheme

14. The purpose of the scheme was for the defendant to unjustly enrich herself by obtaining pandemic-related funds by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means

15. In furtherance of the scheme, **ANDERSON** filed false and fraudulent PPP and EIDL applications. In her applications, she made false representations and submitted fraudulent and misleading documents intended to bolster her applications.

16. Specifically, **ANDERSON** filed the following PPP and EIDL applications, which contained the false representations described below, among others:

Date	Application	Applicant Name	Example of False Statements
July 5, 2020	EIDL	Keerria Anderson	That **ANDERSON** owned an agricultural business with 10 employees and gross revenues of $99,000 for the tax year 2019.
March 31, 2021	PPP	Keerria Anderson	That ANDERSON's business had a gross income of $98,312 for the tax year 2020
May 12, 2021	PPP	Keerria Anderson	That ANDERSON's business had a gross income of $98,312 for the tax year 2020

17. In support of her fraudulent PPP applications, **ANDERSON** submitted fraudulent and misleading documents, including a fictious 2020 Schedule C 1040 Tax Form, which falsely represented that her business had more than $98,312 in gross receipts and sales for the year and the company had more than $49,100 in expenses. As **ANDERSON** knew at the time, those representations were not true, because she was employed full-time at the USPS.

18. Based on **ANDERSON's** false representations, **ANDERSON** successfully gained control of approximately $50,962 in pandemic relief proceeds to which she was not entitled, including the following:

a. EIDL Advance, in the amount of $10,000, disbursed by the SBA to **ANDERSON**'s Acct. x7583 at Bank 1;

b. A PPP loan, in the amount of $20,481, wired from Financial Lender 1 to **ANDERSON's** Acct. x7583 at Bank 1; and

c. A PPP loan, in the mount of $20,481, wire from Financial Lender 2 to **ANDERSON's** Acct. x7583 at Bank 1.

19. In October 2021, ANDERSON submitted applications for PPP loan forgiveness to Financial Lender 1 and Financial Lender 2. In those applications, **ANDERSON** certified that the PPP funds were used for eligible business expenses, such as to maintain payroll. However, as **ANDERSON** well knew at the time, the funds were used for personal expenses unrelated to any business operations.

COUNT 1
Wire Fraud
(18 U.S.C. §1343)

20. The allegations contained in Paragraphs 1–19 are incorporated by reference herein as factual allegations.

21. On or about the dates set forth below, in the Middle District of Louisiana and elsewhere, for the purpose of executing the aforementioned scheme and artifice to defraud, **KEEIRRA ANDERSON**, the defendant herein, did cause to be transmitted in interstate commerce the following wire communications, among others:

COUNT	APPROXIMATE DATE	WIRE TRANSFER DESCRIPTION
1	May 3, 2021	Electronic transfer of $20,481 in PPP fund proceeds from Financial Lender 1's servers outside of the State of Louisiana to Bank 1's servers located in the Middle District of Louisiana.

The above is a violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

22. The allegations contained in Paragraphs 1-21 of this Bill of Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c).

23. Upon conviction of Count 1 in this Bill of Information, **KEERRIA ANDERSON**, defendant herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), all property, real or personal that constitutes or is derived from proceeds traceable to the offense, including but not limited to a sum of money equal to the amount of the proceeds of the offense.

24. 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,

it is the intent of the United States, pursuant 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

UNITED STATES OF AMERICA, BY

DATE: 3/18/26

KURT WALL
ACTING UNITED STATES ATTORNEY
MIDDLE DISTRICT OF LOUISIANA

KRISTEN LUNDIN CRAIG
ASSISTANT UNITED STATES ATTORNEY

Criminal Cover Sheet — U.S. District Court

Place of Offense:

City: Baton Rouge

County/Parish: EBR

*Investigating Agency: USPS-OIG

*Agent: Amanda Smith

Matter to be sealed: ☐ Yes ☑ No

Related Case Information:

BOI ☑ Docket Number _____

Same Defendant ☐ New Defendant ☑

Magistrate Case Number: _____

Search Warrant Case No.: _____

R 20/ R 40 from District of: _____

Any Other Related Cases: _____

Defendant Information:

Defendant Name: Keerria Anderson

Alias: _____

Address: _____

DOB: _____ SS / Alien#: _____ Sex: ____ Race: _____ Nationality: _____

U.S. Attorney Information:

AUSA: Kristen L. Craig Bar #: LBN 32565

Interpreter: ☐ Yes ☑ No **List language and/or dialect:** _____

Location Status:

Arrest Date: _____

☐ Already in Federal Custody as of _____

☐ Already in State Custody

☐ On Pretrial Release

U.S.C. Citations:

Total # of Counts: 1

Mandatory Minimum Charged? ☐ Yes ☑ No

Code	Description of Offense Charged	Count(s)	Petty/ Misdemeanor/ Felony
18 U.S.C. § 1343	Wire Fraud	1	F

(May be continued on second sheet)

Date: _____ **Signature of AUSA:** KRISTEN CRAIG Digitally signed by KRISTEN CRAIG Date: 2026.03.18 13:46:09 -05'00'