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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,	**Case No. 3:26-cv-01881**
Plaintiff,	
v.	**COMPLAINT AND DEMAND FOR JURY TRIAL**
RAMZY PETER HATTAR; and ZEDAN OUTDOORS, LLC d/b/a Talyor's Bar & Grill,	
Defendants.	

The United States of America, by authority of the Attorney General of the United States and at the request of the United States Small Business Administration ("SBA"), files this complaint and alleges as follows:

NATURE OF ACTION

1. This is a civil action brought pursuant to False Claims Act, 31 U.S.C. §§ 3729-33 ("the FCA"), seeking damages and civil penalties arising from false claims presented or caused to be presented by Defendant Ramzy Peter Hattar ("Hattar") on behalf of Defendant Zedan Outdoors, LLC, d/b/a Taylor's Bar & Grill ("Taylor's Bar & Grill") (hereinafter referred to collectively as "Defendants") to the SBA in connection with its Paycheck Protection Program ("PPP") and Economic Injury Disaster Loan ("EIDL") program.

JURISDICTION AND VENUE

2. This Court has jurisdiction over the subject matter of and parties to this action pursuant to 28 U.S.C. §§ 1331, 1345, and 31 U.S.C. § 3732(a).

3. Venue is proper in this jurisdiction pursuant to 28 U.S.C. § 1391(b) because all the acts alleged occurred in this judicial district and all defendants reside in or are located, registered, and conduct business in this district.

PARTIES

4. Plaintiff is the United States of America (the "United States"), suing on behalf of the SBA.

5. Defendant Ramzy Peter Hattar was at all relevant times a resident of the state of Oregon and the owner, member, and manager of, and registered agent for defendant business Zedan Outdoors, LLC d/b/a Taylor's Bar & Grill, a domestic limited liability company formerly registered to conduct business in the state of Oregon. It was administratively dissolved on or about October 2, 2025.

THE FALSE CLAIMS ACT

6. The False Claims Act, 31 U.S.C. § 3729(a)(1)(A) and (B), provides in pertinent part, that a person who does any of the following is liable for three times the amount of the government's damages and mandatory civil penalties:

a. knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval;

b. knowingly makes, uses, or causes to be made or used, a false record or statement material to a false or fraudulent claim.

7. "Knowingly," for purposes of the False Claims Act, does not require proof of specific intent to defraud. Instead, knowingly means that a person:

a. Has actual knowledge of the information;

b. Acts in deliberate ignorance of the truth or falsity of the information; or

c. Acts in reckless disregard of the truth or falsity of the information.

31 U.S.C. § 3729(b)(1).

THE CARES ACT

8. On or about March 27, 2020, the CARES Act, Pub. L. 116-136, became law and provided emergency financial assistance for individuals, families, and businesses affected by the COVID-19 pandemic.

9. The EIDL program is an SBA program that provides low-interest loans of up to $2 million to small businesses, renters, and homeowners in regions affected by declared disasters.

10. Section 1110 of the CARES Act authorized SBA to, among other things, waive certain requirements for eligible EIDL borrowers for loans made in response to the COVID-19 pandemic. Section 1110 also authorized SBA to issue advances of up to $10,000 to small businesses within three days of receiving an application for an EIDL based on the applicant's certification that the applicant is eligible. The advances do not have to be repaid.

11. An EIDL applicant was required to certify that all information in the application was true and correct to the best of the applicant's knowledge. The application included warnings that any false statement or misrepresentation to the SBA may result in criminal and civil penalties.

12. EIDL loans obtained pursuant to the CARES Act were required to be used as working capital to alleviate economic injury caused by disaster occurring in the month of January 2020 and continuing thereafter.

13. To be eligible for an EIDL loan the applicant certified that the funds would not be used for personal purposes, that the borrower's ownership in the collateral is free of all adverse claims, liens, or security interests, and that all of the information in and submitted with the application is true and correct.

14. The CARES Act also established the Paycheck Protection Program ("PPP") for the purpose of providing forgivable loans to small businesses to support job retention and cover other specified expenses.

15. Congress made the PPP loans available in two separate rounds or "draws" beginning in or about April 2020 and ending in or about March 2021. Qualified borrowers who obtained a "first draw" loan were then eligible to apply for a "second draw" loan.

16. To be eligible for a PPP loan, the applicant certified that it was in business as of February 15, 2020 and would use the loan proceeds to retain workers and maintain payroll, or for other limited, specifically enumerated business operating expenses.

GENERAL ALLEGATIONS

17. Taylor's Bar & Grill was located in Eugene, Oregon, adjacent to the University of Oregon. It was founded in 1922. As of February 25, 2020, Taylor's Bar & Grill was permanently closed after the Oregon Liquor and Cannabis Commission revoked its liquor license. A note posted on the door that day stated, "Closed forever. No Trespassing."

EIDL Loan

18. On or about March 31, 2020, Defendant Hattar submitted an EIDL application number 3600257824 on behalf of Taylor's Bar & Grill. In the application Hattar listed Taylor's Bar & Grill's primary place of business as 529 NW 13th Avenue, Portland, Oregon, which is the location of the River Pig Saloon, a separate business owned by Hattar. On the application Hattar also falsely certified the following:

- The business has 26 employees;
- The proceeds will be used solely as working capital to alleviate economic injury caused by disaster occurring in the month of January 2020 and continuing thereafter;
- The proceeds will not primarily be used for personal, family or household purposes;
- Borrower's ownership in or title to the collateral is free of all adverse claims,

liens, or security interests; and

- All information in the application and submitted with the application is true and correct.

19. On or about April 13, 2020, Hattar received an EIDL Advance in the amount of $10,000. On or about April 29, 2021, Hattar recertified the above information in an attempt to obtain an increase in the EIDL loan amount. On or about May 9, 2020, the SBA disbursed EIDL proceeds in the amount of $202,500, SBA loan number 23086974-00. The false statements described above were material to SBA's approval of the EIDL loan at issue because the SBA would not have approved the loan had it been aware of the true facts described above.

First Draw PPP Loan

20. On or about May 5, 2020, Hattar submitted a first draw PPP application on behalf of Taylor's Bar & Grill. In the PPP application Hattar falsely certified the following:

- Applicant is eligible to receive a loan under the rules;
- Applicant had employees for whom it paid salaries and payroll taxes;
- Funds will be used to retain workers and maintain payroll or make mortgage interest payments;
- Loan proceeds will be used only for business-related purposes as specified in the loan application and consistent with the PPP rules; and
- The information provided in this application and the information provided in all supporting documents and form is true and accurate in all material respects.

21. On or about May 6, 2020, Hattar received the PPP loan disbursement in the amount

of $135,700 from Solera National Bank, SBA loan number 4359037302. At the time of application Taylor's Bar & Grill had been permanently closed. The first draw PPP loan was not forgiven or repaid and was charged off by the SBA in the amount of $145,329.12.

22. The false statements described above were material to SBA's approval of the PPP loan at issue because the SBA would not have approved the loan had it been aware of the true facts described above.

23. In total, Defendant fraudulently obtained approximately $348,200.

Second Draw PPP Loan:

24. On or about January 25, 2021, Hattar submitted a second draw PPP application on behalf of Taylor's Bar & Grill, containing the same false certifications described above, which was denied.

FIRST CLAIM FOR RELIEF

False Claims Act – Presenting False or Fraudulent Claims to the United States, 31 U.S.C. § 3729(a)(1)(A)

25. The United States realleges each of the preceding paragraphs as if fully set forth herein.

26. Defendants presented to the United States for payment or approval the false or fraudulent claims as described above, with knowledge that they were false, with deliberate ignorance of their truth or falsity, or with reckless disregard for their truth or falsity.

27. Defendants' false statements made in connection with the PPP and EIDL loan and forgiveness applications were material.

28. Plaintiff United States has sustained damages as a result of Defendants' false or

fraudulent claims in an amount to be determined at trial, and owes the United States treble its damages and civil penalties for each false and fraudulent claim.

SECOND CLAIM FOR RELIEF

False Claims Act – Making a False Record or Statement Material to a False or Fraudulent Claim, 31 U.S.C. § 3729(a)(1)(B)

29. The United States realleges each of the preceding paragraphs as if fully set forth herein.

30. Defendants knowingly made, used, or caused to be made or used, false records or statements to get false or fraudulent claims paid or approved by the United States, and knowingly made, used, or caused to be made or used, false records or statements material to false or fraudulent claims to the United States.

31. Defendants' false statements made in connection with the PPP and EIDL loan and forgiveness applications were material.

32. Plaintiff United States has sustained damages as a result of Defendants' false or fraudulent claims in an amount to be determined at trial, and owes the United States treble its damages and civil penalties for each false and fraudulent claim.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the United States of America, respectfully prays for judgment against Defendants as follows:

a. On the First Claim for Relief, treble the amount of actual damages sustained by the United States, plus such civil penalties as are allowable by law against Defendants;

b. On the Second Claim for Relief, treble the amount of actual damages sustained by

the United States, plus such civil penalties as are allowable by law against Defendants;

c. An award to the United States of all its costs in this action to the maximum extent permissible; and

d. Such other and further relief as the Court deems just and proper.

Dated this 10th day of September 2026.

SCOTT E. BRADFORD
United States Attorney

/s/ William M. Narus
WILLIAM M. NARUS
First Assistant United States Attorney

/s/ Staci Schoff
STACI SCHOFF
Special Assistant United States Attorney