IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

SECRET

UNITED STATES OF AMERICA, Plaintiff, v. RENETTA GOLDEN-LARIMORE (01), [DOB: 11/18/1968] CAMONTE HENDERSON (02), [DOB: 04/19/1998] TAJONA MANNING (03), [DOB: 09/26/1992] TASHAWN MAYFIELD (04), [DOB: 04/22/1993] QUINNIECE SMITH (05) [DOB: 05/14/1990] DANNISHA TAYLOR (06) [DOB: 01/01/1991] Defendants.	Case No. 23-00233-01/06-CR-W-DGK COUNT ONE: 18 U.S.C. § 1349 *(Conspiracy to Commit Wire Fraud)* NMT 20 Years Imprisonment NMT $250,000 Fine NLT 3 Years Supervised Release Class C Felony COUNTS TWO - SEVEN: 18 U.S.C. § 1343 *(Wire Fraud)* NMT 20 Years Imprisonment NMT $250,000 Fine NLT 3 Years Supervised Release Class C Felony ALLEGATION OF CRIMINAL FORFEITURE 18 U.S.C. § 981(a)(1)(C) 28 U.S.C. § 2461 $100 Mandatory Special Assessment Each Count

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	RENETTA GOLDEN-LARIMORE	1 - 7
2	CAMONTE HENDERSON	1 & 2, and Forfeiture Allegation
3	TAJONA MANNING	1 & 3, and Forfeiture Allegation
4	TASHAWN MAYFIELD	1 & 4, and Forfeiture Allegation
5	QUINNIECE SMITH	1, 5 & 6, and Forfeiture Allegation
6	DANNISHA TAYLOR	1 & 7, and Forfeiture Allegation

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

At all times material to this Indictment:

Introduction

1. Beginning no later than on or about March 2021, and continuing until at least January 2022, in Jackson County, within the Western District of Missouri and elsewhere, RENETTA GOLDEN-LARIMORE (GOLDEN-LARIMORE); CAMONTE HENDERSON; TAJONA MANNING; TASHAWN MAYFIELD; QUINNIECE SMITH and DANNISHA TAYLOR, defendants herein, conspired, confederated and agreed with each other and persons known and unknown to the grand jury, to electronically submit false and fraudulent applications for Paycheck Protection Program (PPP) loans affecting interstate commerce. The scheme caused over $240,000 in fraudulent PPP loans to be issued to ineligible borrowers, some of which were forgiven even though the funds were not used for the purposes specified in the PPP.

2. Defendant GOLDEN-LARIMORE, a resident of Kansas City, Missouri, prepared and filed fraudulent PPP loan applications on behalf of other persons. Generally, she charged fees between $2,000 and $7,000 for her assistance in filing false and fraudulent PPP loans. GOLDEN-LARIMORE would create counterfeit IRS Forms Schedule C for nonexistent businesses and with inflated income for existing businesses in order to qualify the borrower for a PPP loan. GOLDEN-LARIMORE submitted and caused to be submitted false and fraudulent PPP loan applications and counterfeit IRS Forms Schedule C to the Small Business Administration (SBA) and lenders outside the State of Missouri.

I. THE PAYCHECK PROTECTION PROGRAM

3. On March 27, 2020, the President signed into law the Coronavirus Aid, Relief, and Economic Security Act ("The Cares Act"), an economic stimulus bill that, among other things, provided emergency assistance to small business owners, including agricultural businesses, and nonprofit organizations in all U.S. states, Washington D.C., and territories affected by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to $349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program ("PPP"). Additional PPP funding was authorized in legislation enacted on or about December 27, 2020, and March 11, 2021.

4. As discussed more fully below, the PPP program, which is operated by the Small Business Administration ("SBA") provided small businesses with funding to meet specific business obligations, including payroll and rent. The PPP permitted participating third-party lenders to approve and disburse SBA-backed PPP loans to cover payroll, fixed debts, utilities, rent/mortgage, accounts payable and other bills incurred by qualifying businesses during, and resulting from, the COVID-19 pandemic. PPP loans are fully guaranteed by the SBA. In the event of default, SBA will fully satisfy the lender for any balance remaining on the loan. Further, SBA will forgive any loan up to 100 percent if the borrower establishes it utilized 60 percent of the loan on payroll costs in the 24-week period post-disbursement, with the remaining 40 percent going toward covered mortgage interest payments, covered rent payments, covered utilities, covered operations expenditures, covered property damage costs, covered supplier costs, and covered worker protection expenditures. Whatever portion is not forgiven is serviced as a loan.

5. The SBA promulgated regulations concerning eligibility for a PPP loan. To obtain a PPP loan, a qualifying business was required 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 in order to be eligible to obtain the PPP loan, including that the business was in operation on February 15, 2020 and either had employees for whom it paid salaries and payroll taxes or paid independent contractors, as reported on a "Form 1099-MISC." Specifically, in the PPP loan application (SBA Form 2483), the small business (through its authorized representative) was required to state, among other things, its: (a) average monthly payroll expenses; and (b) number of employees.

6. Individuals who operated a business under a "sole proprietorship" business structure were also eligible for a PPP loan. To qualify for a PPP loan,individuals had to report and document their income and expenses from the sole proprietorship, as typically reported to the Internal Revenue Service on a "Form 1040, Schedule C," for a given tax year. As with other PPP loans, this information and supporting documentation was used to calculate the amount of money the individual was entitled to receive under the PPP. The maximum loan amount for a sole proprietor with no employees was $20,833.

7. A PPP loan application was processed by the third-party participating lender with whom the application was filed. If a PPP loan application was approved,the participating lender would fund the PPP loan; in order to encourage PPP loans to be issued, the loan was guaranteed by the SBA. Data from the application, including information from 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.

8. The proceeds of a PPP loan could be used only for certain specified items, such as payroll costs, costs related to the continuation of group health care benefits, or mortgage interest payments. The proceeds of a PPP loan were not permitted to be used by the borrowers to purchase consumer goods, automobiles, personal residences, clothing, jewelry, to pay the borrower's personal federal income taxes, or to fund the borrower's ordinary day-to-day living expenses unrelated to the specified authorized expenses.

9. The following lenders funded the PPP loans:

Prestamos CDFI, LLC (Prestamos) was a Community Development Financial Institution (CDFI) headquartered in Arizona;

Capital Plus Financial, LLC was a CDFI headquartered in Bedford, Texas.

COUNT ONE

The Scheme

10. The allegations set forth in paragraphs 1 through 9 are hereby incorporated in full.

11. Beginning on or about March 2021, and continuing through on or about January 2022, in Jackson County, within the Western District of Missouri and elsewhere, the defendants RENETTA GOLDEN-LARIMORE; CAMONTE HENDERSON; TAJONA MANNING; TASHAWN MAYFIELD; QUINNIECE SMITH; and DANNISHA TAYLOR did knowingly combine, conspire, confederate, and agree with each other and with persons known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises, and by omission of material facts, well knowing and having reason to know that said pretenses were and would be false and fraudulent when made and caused to made and that said omissions were and would be material, and in

furtherance thereof transmitted and caused to be transmitted interstate wire communications, contrary to Title 18, United States Code, Section 1343.

Manner and Means:

12. GOLDEN-LARIMORE created PPP loan applications for each of the co-conspirators in exchange for a payment from the loan proceeds. The applications falsely stated either the existence of a sole proprietorship prior to the pandemic or greatly inflated the revenues of any "businesses" that did exist in 2019.

13. GOLDEN-LARIMORE made and forged fictitious IRS Forms Schedule C to support the fraudulent PPP loan applications that would be submitted to various third-party lenders designated by the SBA to participate in the PPP. These IRS Forms Schedule C falsely stated that the person in whose name the loan was submitted had operated a sole proprietorship in 2019 or 2020. The IRS Forms Schedule C included false statements of income and expenses attributed to the business in whose name the PPP loan application was submitted. The PPP loan applications also certified that the information provided in the application and in supporting documents was true and accurate in all respects.

14. GOLDEN-LARIMORE submitted the PPP loan applications on behalf of each of the co-conspirators. GOLDEN-LARIMORE submitted the applications from a computer using internet service located in Kansas City, Missouri. GOLDEN-LARIMORE often used the internet access on her telephone to monitor the progress in the processing of the loan applications.

15. Once the PPP loans were funded, the co-conspirators would pay GOLDEN-LARIMORE between $2,000 and $7,000 for making and submitting the false loan applications.

16. On or about the dates listed below, GOLDEN-LARIMORE electronically created loan accounts, submitted false PPP loan applications through Blue Acorn, or checked the status of the loans to the SBA's servers in Oregon or to the lenders in the states listed below:

	DATE	BORROWER	IP ADDRESS	FINANCE COMPANY & LOCATION	Amount of PPP Loan
a.	03/20/2021	CAMONTE HENDERSON	75.81.141.44	Capital Plus Financial, LLC, Texas	$20,832
b.	03/29/2021	TAJONA MANNING	75.81.141.44	Capital Plus Financial, LLC, Texas	$20,832
c.	04/02/2021	TASHAWN MAYFIELD	75.81.141.44	Capital Plus Financial, LLC, Texas	$20,832
d.	03/20/2021	QUINNIECE SMITH	75.81.141.44	Capital Plus Financial, LLC, Texas	$20,832
e.	05/20/2021	QUINNIECE SMITH	75.81.141.44	Prestamos – Arizona	$20,832
f.	04/11/2021	DANNISHA TAYLOR	75.81.141.44	Capital Plus Financial, LLC, Texas	$20,832

All in violation of the provisions of Title 18, United States Code, Section 1349.

COUNTS TWO - SEVEN

17. Paragraphs 1 through 16 of the Indictment are hereby realleged and incorporated into Counts Two through Seven.

COUNT TWO

18. On or about March 20, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant, CAMONTE HENDERSON, crated an application to Blue Acorn to apply for a PPP loan under the CARES Act for HENDERSON's business - "Henderson's Landscapers".

19. The application and supporting documents were submitted on April 5, 2021, and stated that the defendant CAMONTE HENDERSON was a sole proprietor of a business which had gross receipts or sales of $225,001 and a profit of $219,301. As part of the application, a 2020 tax return for the defendant CAMONTE HENDERSON was submitted listing the same gross receipts and profit of on Form Schedule C.

20. In fact, the defendant CAMONTE HENDERSON did not have a business in 2019 with those gross receipts and profit. CAMONTE HENDERSON's 2019 tax return listed $9,153 in wages and no other income.

21. On or about the date set forth below, in Kansas City, Missouri, in the Western District of Missouri, the defendant, RENETTA GOLDEN-LARIMORE, aided and abetted by defendant CAMONTE HENDERSON, having devised and intended to devise a scheme to obtain money by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

Count	Date	Wire From	To	Amount
2	04/27/2021	Capital Plus Financial	First Federal Bank of Kansas City	$20,832

All in violation of the provisions of Title 18, United States Code, Section 1343.

COUNT THREE

22. On or about March 29, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant TAJONA MANNING, completed and sent an application and supporting documents to Blue Acorn to apply for a PPP loan under the CARES Act for her business.

23. The application and supporting documents stated that the defendant TAJONA MANNING was a sole proprietor of a business established July 2, 2018, and that had gross receipts of $144,080 and net income of $99,982. As part of the application, a 2019 Form Schedule C was submitted listing gross receipts of $225,001 and a profit of $101,133.

24. In fact, the defendant TAJONA MANNING did not have a business in 2019 with those gross receipts and profit. TAJONA MANNING's personal 2019 tax return reported $28,852 in wages and no other income.

25. On or about the date set forth below, in Kansas City, Missouri, in the Western District of Missouri, the defendant, RENETTA GOLDEN-LARIMORE, aided and abetted by defendant TAJONA MANNING, having devised and intended to devise a scheme to obtain money by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

Count	Date	Wire From	To	Amount
3	04/29/2021	Capital Plus	Community American Credit Union	$20,832

Contrary to the provisions of Title 18, United States Code, Section 1343.

COUNT FOUR

26. On or about April 2, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant TASHAWN MAYFIELD, completed and sent an application and supporting documents to Blue Acorn to apply for a PPP loan under the CARES Act for her business.

27. The application and supporting documents stated that the defendant TASHAWN MAYFIELD was a sole proprietor of a business established February 4, 2019, and that had gross receipts of $141,080 and net income of $135,887. As part of the application, a 2019 Form Schedule C was submitted listing gross receipts of $144,080 and a net income of $135,887.

28. In fact, the defendant TASHAWN MAYFIELD did not have a business in 2019 with those gross receipts and profit. TASHAWN MAYFIELD's personal 2019 tax return listed adjusted gross income of $43,459.

29. On or about the date set forth below, in Kansas City, Missouri, in the Western District of Missouri, the defendant, RENETTA GOLDEN-LARIMORE, aided and abetted by defendant TASHAWN MAYFIELD, having devised and intended to devise a scheme to obtain money by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

Count	Date	Wire From	To	Amount
4	04/29/21	Capital Plus Financial	Bank Midwest	$20,832

Contrary to the provisions of Title 18, United States Code, Section 1343.

COUNT FIVE

30. On or about March 20, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant QUINNIECE SMITH, completed and sent an application and supporting documents to Blue Acorn to apply for a PPP loan under the CARES Act for her business - beautician services.

31. The application and supporting documents stated that the defendant QUINNIECE SMITH was a sole proprietor of a business established March 1, 2018, and that had gross receipts of $225,001 and net income of $219,301. As part of the application, a 2020 Form Schedule C was submitted listing the same amounts.

32. In fact, the defendant QUINNIECE SMITH did not have a business in 2020 with those gross receipts and profit. QUINNIECE SMITH did not file a tax return in 2020.

33. On or about the date set forth below, in Kansas City, Missouri, in the Western District of Missouri, the defendant, RENETTA GOLDEN-LARIMORE, aided and abetted by defendant QUINNIECE SMITH, having devised and intended to devise a scheme to obtain money by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

Count	Date	Wire From	To	Amount
5	04/01/2021	Capital Plus Financial	JP Morgan Chase Bank	$20,832

Contrary to the provisions of Title 18, United States Code, Section 1343.

COUNT SIX

34. On or about May 20, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant QUINNIECE SMITH, completed and sent an application and supporting documents to Blue Acorn to apply for a PPP loan under the CARES Act for her business.

35. The application and supporting documents stated that the defendant QUINNIECE SMITH was a sole proprietor of a business that in 2019 had gross receipts of $144,080. As part of the application, a 2020 tax return with a Form Schedule C was submitted listing gross receipts of $144, 080 and a net profit of $99,982.

36. In fact, the defendant QUINNIECE SMITH did not have a business in 2020 with those gross receipts and profit. QUINNIECE SMITH's 2019 tax return listed a business loss of $5,104 and she did not file a personal 2020 tax return.

37. On or about the date set forth below, in Kansas City, Missouri, in the Western District of Missouri, the defendant, RENETTA GOLDEN-LARIMORE, aided and abetted by defendant QUINNIECE SMITH, having devised and intended to devise a scheme to obtain money by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

Count	Date	Wire From	To	Amount
6	06/11/2021	Prestamos	Navy Federal Credit Union	$20,832

Contrary to the provisions of Title 18, United States Code, Section 1343.

COUNT SEVEN

38. On or about April 18, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant DANNISHA TAYLOR, completed and sent an application and supporting documents to Blue Acorn to apply for a PPP loan under the CARES Act for her business.

39. The application and supporting documents stated that the defendant DANNISHA TAYLOR was a sole proprietor of a business established February 18, 2018, and that had gross receipts of $144,080 and net income of $99,982. As part of the application, a 2019 tax return with a Form Schedule C was submitted the same amounts.

40. In fact, the defendant DANNISHA TAYLOR did not have a business in 2019 with those gross receipts and profit. DANNISHA TAYLOR's 2019 tax return listed adjusted gross income of $7,332.

41. On or about the date set forth below, in Kansas City, Missouri, in the Western District of Missouri, the defendant, RENETTA GOLDEN-LARIMORE, aided and abetted by defendant DANNISHA TAYLOR, having devised and intended to devise a scheme to obtain money by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

Count	Date	Wire From	To	Amount
7	05/14/2021	Capital Plus	Regions Bank	$20,832

Contrary to the provisions of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

42. The statements and allegations contained in counts one through seven of this Indictment are realleged and incorporated by reference for purposes of alleging forfeiture to the United States, pursuant to provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

43. As a result of the offenses alleged in counts one through six of the Indictment, defendants CAMONTE HENDERSON; TAJONA MANNING; TASHAWN MAYFIELD; QUINNICE SMITH; and DANNISHA TAYLOR shall forfeit all property real and personal, constituting, or derived from, proceeds traceable to the offense, directly or indirectly, as a result of the violations of law set out in Counts 1 through 7 of this Indictment, including, but not limited to, the following property: a separate money judgment as to each individually named defendant in this allegation in the amount of at least $20,832.

Substitute Assets

44. If any of the property described in the above paragraph, as a result of any act or omission of the defendants,

(A) cannot be located upon the exercise of due diligence;

(B) has been transferred to, sold to, or deposited with a third person;

(C) has been placed beyond the jurisdiction of the Court;

(D) has been substantially diminished in value; and/or

(E) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), which is incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

A TRUE BILL.

10/18/2023
DATE

/s/ Kimberley Deardorff
FOREPERSON OF THE GRAND JURY

/s/ Paul Becker
Paul S. Becker
Assistant United States Attorney