UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

UNITED STATES OF AMERICA	)	INFORMATION NO. CR 323-003
	)	
v.	)	False Statements
	)	18 U.S.C. § 1001
GLADYS HARUN	)	
a/k/a "GLADYS CHEGE"	)	

THE UNITED STATES ATTORNEY CHARGES THAT:

Introduction:

At all times material to this Information:

The COVID-19 Pandemic and the CARES Act

1. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or about March 2020 designed to provide emergency financial assistance to the millions who suffered economic effects caused by the COVID-19 pandemic.

2. Among other relief efforts, the United States sought to provide financial support to eligible businesses that could be used to offset certain business expenses.

3. At all times material to this Information, the Small Business Administration ("SBA") was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses. The SBA was headquartered in Washington, DC, and maintained its computer servers outside of the State of Georgia. The SBA's mission was to maintain and strengthen the nation's economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters.

4. As part of this effort, the SBA enabled and provided for loans through banks, credit unions, and other lenders. These loans had government-backed guarantees. In addition, the SBA provided loans that came directly from the U.S. Government.

Economic Injury Disaster Loans

5. One source of relief provided by the CARES Act was the authorization for the SBA to provide Economic Injury Disaster Loans ("EIDLs") to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic.

6. In order to obtain an EIDL, a qualifying business had to submit an online application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the twelve-month period preceding the disaster, and the cost of goods the business sold in the twelve-month period preceding the disaster. In the case of EIDLs, the twelve-month period was that preceding January 31, 2020. The applicant also had to certify that all the information in its application was true and correct to the best of the applicant's knowledge.

7. In addition, the CARES Act authorized the SBA to issue advances of up to $10,000.00 to small businesses within three days of applying for an EIDL ("EIDL Advance"). The amount of the EIDL Advance was determined by the number of employees the applicant certified having.

8. EIDL applications were submitted directly to the SBA online at https://covid19relief.sba.gov/#/ and processed by the agency with support from a

government contractor, Rapid Finance. The amount of each loan was determined based, in part, on the information provided by the application about employment, revenue, and cost of goods. Any funds issued under an EIDL were issued directly by the SBA. EIDL funds could be used for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments.

COUNT ONE
False Statements
18 U.S.C. § 1001(a)(2)

9. Paragraphs 1 through 8 of the Information are incorporated by reference as if fully set forth herein.

10. On or about July 27, 2021, in Dodge County, in the Southern District of Georgia, in a matter within the jurisdiction of the SBA, an independent establishment within the executive branch of the United States Government, Defendant GLADYS HARUN did willfully and knowingly make and cause to be made, and use and cause to be used, a false writing or document knowing the same to contain a materially false, fictitious, and fraudulent statement. Defendant GLADYS HARUN submitted a false EIDL application by falsely claiming that an individual with the initials K.E.W. had a business opened on December 1, 2019, and that such business generated $2,114.00 in gross revenues in 2019 and had $165.00 in cost of goods sold in 2019, when Defendant GLADYS HARUN did in fact know and believe that K.E.W. did not own any business in 2019.

All in violation of Title 18, United States Code, Section 1001(a)(2).

{signatures on the following page}

JILL E. STEINBERG
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF GEORGIA

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