

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

RENETTA GOLDEN-LARIMORE (01),
[DOB: 11/18/1968]

DON A. BAKER (02),
[DOB: 11/26/1975]

STEPHAN BOOTH (03),
[DOB: 02/22/1983]

CAMERON P. HENDERSON (04),
[DOB: 01/09/1996]

CANDACE E. HILL-WILLIAMS (05),
[DOB: 01/08/1998]

REISJON LARIMORE (06),
[DOB: 07/29/1997]

ROGER LARIMORE (07),
[DOB: 02/10/1996]

TEIARA M. MERCER (08),
[DOB: 03/21/2000]

PADGIT L. SMITH (09),
[DOB: 08/27/1974]

JOSEPH VALDIVIA III (10),
[DOB: 10/02/1977]

SALVADOR VALDIVIA (11),
[DOB: 01/02/1982]

MONE'Y C. WOODS (12),
[DOB: 06/12/2001]

Defendants.

Case No. _____

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 - THIRTEEN:

(Wire Fraud)

18 U.S.C. § 1343

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 - 13, and Forfeiture Allegation
2	DON A. BAKER	1 & 3, and Forfeiture Allegation
3	STEPHAN BOOTH	1 & 4, and Forfeiture Allegation
4	CAMERON P. HENDERSON	1 & 5, and Forfeiture Allegation
5	CANDACE E. HILL-WILLIAMS	1 & 6, and Forfeiture Allegation
6	REISJON LARIMORE	1 & 7, and Forfeiture Allegation
7	ROGER LARIMORE	1 & 8, and Forfeiture Allegation
8	TEIARA M. MERCER	1 & 9, and Forfeiture Allegation
9	PADGIT L. SMITH	1 & 10, and Forfeiture Allegation
10	JOSEPH VALDIVIA III	1 & 11, and Forfeiture Allegation
11	SALVADOR VALDIVIA	1 & 12, and Forfeiture Allegation
12	MONE'Y C. WOODS	1 & 13, and Forfeiture Allegation

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

Introduction

1. Beginning no later than on or about February 2021, and continuing until at least May 2022, in Jackson County, within the Western District of Missouri and elsewhere, RENETTA GOLDEN-LARIMORE (GOLDEN-LARIMORE); DON A. BAKER; STEPHAN BOOTH; CAMERON P. HENDERSON; CANDACE HILL-WILLIAMS;

REISJON LARIMORE; ROGER LARIMORE; TEIARA M. MERCER; PADGIT L. SMITH; JOSEPH VALDIVIA III; SALVADOR VALDIVIA; and MONE'Y WOODS, 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 the 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 such 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;

Itria Ventures LLC was a national, non-bank, direct commercial lender based in New York that funded PPP loans.

Capital Plus Financial, LLC was a CDFI community development financial institution 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 February 2021, and continuing through on or about May 2022, in Jackson County, within the Western District of Missouri and elsewhere, the defendants RENETTA GOLDEN-LARIMORE; DON A. BAKER; STEPHAN BOOTH; CAMERON P. HENDERSON; CANDACE HILL-WILLIAMS; REISJON LARIMORE; ROGER LARIMORE; TEIARA M. MERCER; PADGIT L. SMITH; JOSEPH VALDIVIA III; SALVADOR VALDIVIA; and MONE'Y WOODS 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 be 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 the provisions of 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.

On or about the dates listed below, GOLDEN-LARIMORE electronically created loan accounts, submitted false PPP loan applications through blueacorn, 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.	02/11/2021	GOLDEN-LARIMORE	75.81.141.44	Itria Ventures, LLC— New York	\$20,833
b.	04/16/2021	DON A. BAKER	75.81.141.44	Prestamos – Arizona	\$20,832

c.	05/02/2021	STEPHAN BOOTH	75.81.141.44	Prestamos – Arizona	\$20,832
d.	05/21/2021	CAMERON P. HENDERSON	75.81.141.44	Prestamos – Arizona	\$20,832
e.	05/12/2021	CANDACE HILL- WILLIAMS	75.81.141.44	Prestamos – Arizona	\$20,832
f.	03/11/2021	REISJON LARIMORE	75.81.141.44	Itria Ventures, LLC – New York	\$20,833
g.	03/20/2021	ROGER LARIMORE	75.81.141.44	Capital Plus Financial, LLC, Texas	\$20,832
h.	05/02/2021	TEIARA M. MERCER	75.81.141.44	Prestamos – Arizona	\$20,832
i.	04/16/2021	PADGIT L. SMITH	75.81.141.44	Prestamos – Arizona	\$20,832
j.	05/10/2021	JOSEPH VALDIVIA III	75.81.141.44	Prestamos – Arizona	\$20,832
k.	05/10/2021	SALVADOR VALDIVIA	75.81.141.44	Prestamos – Arizona	\$20,832
l.	05/10/2021	MONE’Y WOODS	75.81.141.44	Prestamos – Arizona	\$20,832

Contrary to the provisions of Title 18, United States Code, Section 1349.

COUNTS TWO -THIRTEEN

16. Paragraphs 1 through 15 of the Indictment are hereby realleged and incorporated into Counts Two through Thirteen.

Count Two

17. On or about February 13, 2021, defendant RENETTA GOLDEN-LARIMORE completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for her business Golden R Creations.

18. The application and supporting documents stated that the defendant RENETTA GOLDEN-LARIMORE was a sole proprietor of a business which had an average monthly payroll of \$10,000. The supporting documents also included a Form 1040 SCHEDULE C

for 2020, which listed gross receipts or sales of \$225,001, business expenses of \$123,591 and a profit of \$101,410.

19. In fact, the defendant RENETTA GOLDEN-LARIMORE did not file a 2020 tax return for Golden R Creations and her personal income tax return did not report income and expenses that were claimed in the loan application.

20. On or about the date set forth below, in Kansas City, Missouri, in the Western District of Missouri, the defendant RENETTA GOLDEN-LARIMORE, 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	03/11/2021	Itria Ventures, LLC	Navy Federal Credit Union	\$20,833.33

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

Count Three

21. On or about April 16, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant DON BAKER, completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for BAKER's business.

22. The application and supporting documents stated that the defendant BAKER was a sole proprietor of a business which had gross receipts or sales of \$144,080 and a profit of \$99,982. A 2019 tax return for the defendant Baker listing the same amounts on Form Schedule C was submitted as part of the application.

23. In fact, the defendant BAKER did not have a business in 2019 with those gross receipts and profit and BAKER did not file a personal 2019 tax return.

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 DON BAKER, 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	06/07/2021	Prestamos CDFI	J.P. Morgan Chase	\$20,832

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

Count Four

24. On or about May 2, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant STEPHAN BOOTH, completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for BOOTH's "landscaping services" business.

25. The application and supporting documents stated that the defendant STEPHAN BOOTH was a sole proprietor of a business which had gross receipts or sales of \$144,080 and a profit of \$99,982. As part of the application, a 2019 tax return for the defendant STEPHAN BOOTH was submitted listing gross receipts of \$225,001 and a profit of \$101,410 on Form Schedule C.

26. In fact, the defendant BOOTH did not have a business in 2019 with those gross receipts and profit and BOOTH did not file a personal 2019 tax return.

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 STEPHAN BOOTH, 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	06/07/2021	Prestamos CDFI	J.P. Morgan Chase	\$20,832

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

Count Five

27. On or about May 21, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant CAMERON HENDERSON, completed and sent an application and supporting documents to Blueacorn to apply for a PPP loan under the CARES Act for HENDERSON's business.

28. The application and supporting documents stated that the defendant HENDERSON was a sole proprietor of a business that was established on February 5, 2018, and which had gross receipts or sales of \$144,080 and a profit of \$99,982. As part of the application, a 2019 Form Schedule C was submitted listing the same gross receipts and profit.

29. In fact, the defendant HENDERSON did not have a business in 2019 with those gross receipts and profit. Defendant HENDERSON's personal 2019 tax return did not report income and expenses that were claimed in the loan application.

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 CAMERON 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
5	06/11/2021	Prestamos CDFI	J.P. Morgan Chase	\$20,832

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

COUNT SIX

30. On or about May 12, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant CANDACE HILL-WILLIAMS, completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for HILL-WILLIAMS' business.

31. The application and supporting documents stated that the defendant HILL-WILLIAMS was a sole proprietor of a business that was established on August 6, 2018, and which had gross receipts or sales of \$144,080 and a profit of \$99,982. As part of the application, a 2019 Form Schedule C was submitted listing the same gross receipts and profit.

32. In fact, the defendant HILL-WILLIAMS did not have a business in 2019 with those gross receipts and profit. HILL-WILLIAMS' personal 2019 tax return did not report income and expenses that were claimed in the loan application.

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 CANDACE HILL-WILLIAMS, 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	06/04/2021	Prestamos CDFI	Wells Fargo	\$20,832

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

COUNT SEVEN

33. On or about March 20, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant REISJON LARIMORE, completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for Larimore Landscaping.

34. The application and supporting documents stated that the defendant REISJON LARIMORE was a sole proprietor of a business was established on July 30, 2018, and that had gross income of \$120,000. As part of the application, a 2019 tax return was submitted with a Form Schedule C listing gross receipts of \$225,001 and a profit of \$101,410.

35. In fact, the defendant REISJON LARIMORE did not have a business in 2019 with those gross receipts and profit. REISJON LARIMORE's personal 2019 tax return did not report income and expenses that were claimed in the loan application.

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 REISJON LARIMORE, 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	04/08/2021	Itria Ventures, LLC	Navy Federal Credit Union	\$20,833

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

COUNT EIGHT

36. On or about March 20, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant ROGER LARIMORE, completed and sent an application and supporting documents to Blueacorn to apply for a PPP loan under the CARES Act for his business “Bro’s and Holes”.

37. The application and supporting documents stated that the defendant REISJON LARIMORE was a sole proprietor of a business was established April 6, 2018, and that had gross income of \$125,001. As part of the application, a 2019 Form Schedule C was submitted with listing gross receipts of \$125,001 and a profit of \$67,891.

38. In fact, the defendant, ROGER LARIMORE did not have a business in 2019 with those gross receipts and profit. ROGER LARIMORE’s personal 2019 tax return did not report income and expenses that were claimed in the loan application.

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 ROGER LARIMORE, 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
8	May 18, 2021	Capital Plus Financial LLC	J.P. Morgan Chase	\$20,832

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

COUNT NINE

39. On or about May 19, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant TEIARA MERCER, completed and sent an application and supporting documents to blueacorn apply for a PPP loan under the CARES Act for her business.

40. The application and supporting documents stated that the defendant TEIARA MERCER was a sole proprietor of a business was established January 1, 2020, and that had gross receipts of \$144,080 and net income of \$99,982.

41. In fact, the defendant TEIARA MERCER did not have a business in 2020 with those gross receipts and profit and TEIARA MERCER did not file a personal 2019 or 2020 tax return.

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 TEIARA MERCER, 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
9	06/11/2021	Prestamos CDFI	J.P. Morgan Chase	\$20,832

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

COUNT TEN

42. On or about April 16, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant PADGIT SMITH, completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for her business.

43. The application and supporting documents stated that the defendant PADGIT SMITH was a sole proprietor of a business was established February 1, 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 listing the same amounts.

44. In fact, the defendant, PADGIT SMITH did not have a business in 2019 with those gross receipts and profit. PADGIT SMITH's personal 2019 tax return did not report income and expenses that were claimed in the loan application.

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 PADGIT 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
10	07/12/2021	Prestamos CDFI	J.P. Morgan Chase	\$20,832

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

COUNT ELEVEN

45. On or about May 11, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant JOSEPH VALDIVIA III, completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for his business -a full-service restaurant.

46. The application and supporting documents stated that the defendant JOSEPH VALDIVIA III was a sole proprietor of a business was established February 5, 2018, and that had gross receipts of \$141,080 and net income of \$99,982. As part of the application, a 2019 tax return with a Form Schedule C was submitted listing gross receipts of \$144,080 and a net income of \$99,982.

47. In fact, the defendant, JOSEPH VALDIVIA III did not have a business in 2019 with those gross receipts and profit. JOSEPH VALDIVIA's personal 2019 tax return did not report income and expenses that were claimed in the loan application.

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 JOSEPH VALDIVIA III, 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
11	06/08/2021	Prestamos CDFI	J.P. Morgan Chase	\$20,832

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

COUNT TWELVE

48. On or about May 10, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant SALVADOR VALDIVIA, completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for his business - a landscaping business.

49. The application and supporting documents stated that the defendant JOSEPH VALDIVIA was a sole proprietor of a business was established February 5, 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 listing the same amounts.

50. In fact, the defendant, SALVADOR VALDIVIA did not have a business in 2019 with those gross receipts and profit and SALVADOR VALDIVIA did not file a personal 2019 tax return.

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 SALVADOR VALDIVIA, 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
12	06/04/2021	Prestamos CDFI	J.P. Morgan Chase	\$20,832

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

COUNT 13

51. On or about May 11, 2021, defendant RENETTA GOLDEN-LARIMORE, aided and abetted by defendant MONE'Y WOODS, completed and sent an application and supporting documents to blueacorn to apply for a PPP loan under the CARES Act for her business - beautician services.

52. The application and supporting documents stated that the defendant MONE'Y WOODS was a sole proprietor of a business that was established February 25, 2018, and that had gross receipts of \$141,080 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.

53. In fact, the defendant, MONE Y WOODS did not have a business in 2019 with those gross receipts and profit and MONE'Y WOODS did not file a personal 2019 tax return.

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 MONE'Y WOODS, 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
13	06/04/2021	Prestamos CDFI	J.P. Morgan Chase	\$20,832

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

FORFEITURE ALLEGATION ONE

54. The statements and allegations contained in counts one through 13 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.

55. As a result of the offenses alleged in counts one through 13 of the Indictment, defendant RENETTA GOLDEN-LARIMORE, 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 one through 13 of this Indictment, including, but not limited to, the following property: a money judgment in the amount of at least \$75,833.00.

Substitute Assets

56. If any of the property described in the above paragraph, 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 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 defendant up to the value of the forfeitable property.

FORFEITURE ALLEGATION TWO

57. The statements and allegations contained in counts one through 13 of this Indictment are realleged and incorporated by reference for purposes of alleging forfeiture to the United States, pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

58. As a result of the offenses alleged in counts one through 13 of the Indictment, defendants DON A. BAKER, STEPHAN BOOTH, CAMERON P. HENDERSON, CANDACE HILL-WILLIAMS, REISJON LARIMORE, ROGER LARIMORE, TEIARA M. MERCER, PADGIT L. SMITH, JOSEPH VALDIVIA III, SALVADOR VALDIVIA, and MONE'Y WOODS 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 13 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

59. 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.

04/25/2023
DATE

/s/ Kimberley Deardorff
FOREPERSON OF THE GRAND JURY

/s/ Paul Becker
Paul S. Becker
Assistant United States Attorney
Western District of Missouri