IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

UNITED STATES OF AMERICA	:	
	:	
v.	:	**CRIMINAL NO. 1:24-CR-_______**
	:	
SHERRONICA JACKSON,	:	**VIOLATION:**
TYREEK BROWN, and	:	**18 U.S.C. § 1349**
ALAN BROWN	:	**18 U.S.C. § 1344(2)**
	:	**18 U.S.C. § 2**
Defendants.	:	**18 U.S.C. § 982(a)(2)(A)**

THE GRAND JURY CHARGES:

GENERAL INTRODUCTION

At all times relevant to this Indictment:

1. The United States Small Business Administration (SBA) is an executive-branch agency of the United States government that provides support to entrepreneurs and small businesses. The mission of the SBA is 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.

2. As part of this effort, the SBA enables and provides for loans through banks, credit unions and other lenders. These loans have government-backed guarantees. In addition to traditional SBA funding programs, The CARES Act, which was signed into law in March 2020, established several new temporary programs and provided for the expansion of others to address the COVID-19 outbreak.

3. One of these new programs is the SBA Paycheck Protection Program (PPP), which is a loan designed to provide a direct incentive for small businesses to keep their workers on the payroll. Under this program, the SBA will forgive all or part of loans if all employees were

kept on the payroll for eight weeks and borrowers submit documentation confirming that the loan proceeds were used for payroll, rent, mortgage interest, or utilities. Interested applicants apply through an existing SBA lender or any other participating federally insured financial institution.

4. The PPP application process requires applicants to submit a Borrower Application Form through an SBA-approved financial entity. The application contains information as to the purpose of the loan, average monthly payroll, number of employees and background of the business and its owner, including questions relating to criminal history. Applicants are also required to make good faith certifications, including that economic uncertainties have necessitated their loan requests for continued business operations and that they intend to use loan proceeds only for the authorized and not any duplicative purposes.

COUNT ONE
(Conspiracy to Commit Bank Fraud)

The allegations contained in paragraphs 1 through 4 of the General Introduction of this Indictment are incorporated by reference as if set forth fully herein. Beginning on or about March 26, 2021, to on or about May 16, 2021, in the Albany Division of the Middle District of Georgia and elsewhere within this Court's Jurisdiction,

SHERRONICA JACKSON,
TYREEK BROWN, AND
ALAN BROWN

did unlawfully combine, conspire, confederate, and agree together and with each other, and persons known and unknown to the Grand Jury, to commit and attempt to commit bank fraud, in violation of Title 18, United States Code, Section 1344, by executing and attempting to execute a scheme and artifice to defraud a federally insured financial institution, and to obtain the moneys, funds, credits, assets, and other property owned by and under the custody and control of said financial institution by means of material false and fraudulent pretenses, representations, and promises. In execution of the conspiracy and to affect its objects, the members of the conspiracy committed the acts described in Counts Two through Six of this Indictment, which are hereby incorporated by reference in this Count.

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

COUNTS TWO THROUGH SIX
(Bank Fraud)

On or about the dates set below, in the Albany Division of the Middle District of Georgia and elsewhere within this Court's Jurisdiction,

**SHERRONICA JACKSON,
TYREEK BROWN, AND
ALAN BROWN**

aided and abetted by each other and by others both known and unknown to the Grand Jury, did knowingly and intentionally execute a scheme and artifice to obtain money and funds under the custody and control of the federally insured financial institutions set forth below, by means of false and fraudulent pretenses and representations, to wit, by the use of fraudulent applications for Paycheck Protection Program assistance. In executing the scheme to defraud, defendants submitted applications containing fabricated gross income figures to qualify for loans under the SBA Paycheck Protection Program for which they were not entitled.

Count	Date	Gross Income Claimed	Financial Institution	Loan Amount Received
2.	March 26, 2021	$97,000.00	Capital Plus Financial, LLC	$20,207.00
3.	April 17, 2021	$101,005.00	Harvest Small Business Finance, LLC	$20,833.00
4.	April 21, 2021	$101,005.00	Harvest Small Business Finance, LLC	$20,833.00
5.	April 14, 2021	$103,400.00	Harvest Small Business Finance, LLC	$20,833.00

6.	April 16, 2021	$103,400.00	Harvest Small Business Finance, LLC	$20,833.00

In violation of Title 18, United States Code, Section 1344(2) and 2.

FORFEITURE NOTICE
(18 U.S.C. § 982(a)(2)(A) – Criminal Forfeiture)

1. The allegations contained in Counts One through Six of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

2. Upon conviction of the offense(s) in violation of Title 18, United States Code, Section 1349 set forth in Count One; and/or Title 18, United States Code, Section 1344(2) set forth in Counts Two through Six of the Indictment, the defendant(s),

SHERRONICA JACKSON,
TYREEK BROWN, AND
ALAN BROWN,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s), including, but not limited to a money judgment in an amount to be determined.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon exercise of due diligence;

(b) has been transferred, 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; or

(e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to 18 U.S.C. § 982(a)(2)(A).

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PETER D. LEARY
UNITED STATES ATTORNEY

Presented By:

Veronica Hansis
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 14 day of Aug, AD 2024.

Deputy Clerk