Proposed Verdict Sheet

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
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	*	
	*	
	*	
V.	*	**Criminal No. MJM-21-470**
	*	
NICHELLE HENSON	*	
	*	
	*	
	*	
	*	

* * * *

A reasonable doubt is a doubt that is based on reason and common sense. It is not a mere guess or hunch.

The Defendant, acting as their own attorney (pro se), does not have the same legal training as a professional lawyer. You may consider this when evaluating the evidence presented.

This means that after considering all the evidence, you must be firmly convinced of the defendant's guilt. If you are not convinced, or if there is any reasonable doubt about the defendant's guilt, you must find the defendant not guilty. If you find the Defendant not guilty on any or all charges, you are not required to explain your verdict.

Charges 1-6: False Statement

CHARGE ONE: False statement to a bank

April 14, 2020 EIDL Application for Your Friendly Tax Preparation Services LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **NICHELLE HENSON**, knowingly made a false statement to a bank for the purpose of influencing the bank's action?

Yes * No

Understanding Your Verdict on Charge 1:

In order to find the Defendant guilty of False Statement to a Bank, the United States must have proven all of the following elements beyond a reasonable doubt:

1. The Defendant made a false statement to a bank.
2. The statement was material, meaning it could have influenced the bank's decision.
3. The Defendant made the statement knowingly and willfully.

4. The statement related to a loan or other credit.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 1: False Statements to a bank

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly made a false statement to a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 1, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE TWO: False Statements to a bank

June 19, 2020 EIDL Application for One Stop for Services LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **NICHELLE HENSON**, knowingly made a false statement to a bank for the purpose of influencing the bank's action?

Yes * No

Understanding Your Verdict on Charge 2:

In order to find the Defendant guilty of False Statement to a Bank, the United States must have proven all of the following elements beyond a reasonable doubt:

1. The Defendant made a false statement to a bank.
2. The statement was material, meaning it could have influenced the bank's decision.
3. The Defendant made the statement knowingly and willfully.
4. The statement related to a loan or other credit.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 2: False Statements to a bank

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly made a false statement to a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 2, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE THREE: False statement to a bank

June 19, 2020 EIDL Application for Nichelle Henson Campaign LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **NICHELLE HENSON**, knowingly made a false statement to a bank for the purpose of influencing the bank's action?

Yes * No

Understanding Your Verdict on Charge 3:

In order to find the Defendant guilty of False Statement to a Bank, the United States must have proven all of the following elements beyond a reasonable doubt:

1. The Defendant made a false statement to a bank.
2. The statement was material, meaning it could have influenced the bank's decision.
3. The Defendant made the statement knowingly and willfully.
4. The statement related to a loan or other credit.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 3: False Statements to a bank

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly made a false statement to a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 3, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE FOUR: False statement to a bank

June 19, 2020 EIDL Application for Peace of Mind Services Inc.

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **NICHELLE HENSON**, knowingly made a false statement to a bank for the purpose of influencing the bank's action?

Yes * No

Understanding Your Verdict on Charge 4:

In order to find the Defendant guilty of False Statement to a Bank, the United States must have proven all of the following elements beyond a reasonable doubt:

1. The Defendant made a false statement to a bank.
2. The statement was material, meaning it could have influenced the bank's decision.
3. The Defendant made the statement knowingly and willfully.
4. The statement related to a loan or other credit.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 4: False Statements to a bank

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly made a false statement to a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 4, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE FIVE: False statement to a bank

April 7, 2021 EIDL Application for Nichelle Henson Campaign LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **NICHELLE HENSON**, knowingly made a false statement to a bank for the purpose of influencing the bank's action?

Yes * No

Understanding Your Verdict on Charge 5:

In order to find the Defendant guilty of False Statement to a Bank, the United States must have proven all of the following elements beyond a reasonable doubt:

1. The Defendant made a false statement to a bank.
2. The statement was material, meaning it could have influenced the bank's decision.
3. The Defendant made the statement knowingly and willfully.
4. The statement related to a loan or other credit.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 5: False Statements to a bank

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly made a false statement to a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 5, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE SIX: False statement to a bank

April 7, 2021 EIDL Application for Your Friendly Tax Preparation Services LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **NICHELLE HENSON**, knowingly made a false statement to a bank for the purpose of influencing the bank's action?

Yes * No

Understanding Your Verdict on Charge 6:

In order to find the Defendant guilty of False Statement to a Bank, the United States must have proven all of the following elements beyond a reasonable doubt:

1. The Defendant made a false statement to a bank.

2. The statement was material, meaning it could have influenced the bank's decision.
3. The Defendant made the statement knowingly and willfully.
4. The statement related to a loan or other credit.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 6: False Statements to a bank

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly made a false statement to a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 6, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

Charges 7-12: Bank Fraud

CHARGE SEVEN: Bank Fraud

April 30, 2020 PPP Loan Application for Your Friendly Tax Preparation Services LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson**, knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 7: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.
2. The Defendant knowingly participated in the scheme.
3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.
4. Engaged in a scheme to defraud a financial institution.
5. Did so with the intent to deceive.
6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 7: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 7, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE EIGHT: Bank Fraud

May 10, 2020 PPP Loan Application for Nichelle Henson Campaign LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 8: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 8: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 8, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE NINE: Bank Fraud

May 14, 2020 PPP Loan Application for One Stop for Services LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 9: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 9: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 9, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE TEN: Bank Fraud

June 20, 2020 PPP Loan Application for Peace of Mind Services Inc.

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 10: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 10: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 10, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE ELEVEN: Bank Fraud

June 23, 2020 PPP Loan Application for Women Entrepreneurs Can Succeed LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 11: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 11: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 11, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE TWELVE: Bank Fraud

June 23, 2020 PPP Loan Application for Women Entrepreneurs Can Succeed LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 12: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 12: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 12, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

Charges 13-18: Bank Fraud (Second Draw PPP Loans)

CHARGE THIRTEEN: Bank Fraud

January 19, 2021 PPP Loan Application for Your Friendly Tax Preparation Services LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 13: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 13: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 13, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE FOURTEEN: Bank Fraud

January 19, 2021 PPP Loan Application for Nichelle Henson Campaign LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 14: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 14: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 14, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE FIFTHTEEN: Bank Fraud

January 19, 2021 PPP Loan Application for One Stop for Services LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 15: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 15: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 15, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE SIXTEEN: Bank Fraud

January 19, 2021 PPP Loan Application for Peace of Mind Services Inc.

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 16: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 16: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 16, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE SEVENTEEN: Bank Fraud

January 19, 2021 PPP Loan Application for Women Entrepreneurs Can Succeed LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 17: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 17: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 17, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____

CHARGE EIGHTEEN: Bank Fraud

January 19, 2021 PPP Loan Application for Crowns Construction LLC

Do you find the United States has proven beyond a reasonable doubt that the Defendant, **Nichelle Henson,** knowingly executed or attempted to execute a scheme to defraud a financial institution?

Yes * No

Understanding Your Verdict on Charge 18: Bank Fraud

In order to find the Defendant guilty of Bank Fraud, the United States must have proven all of the following elements beyond a reasonable doubt:

1. A scheme to defraud a financial institution.

2. The Defendant knowingly participated in the scheme.

3. The Defendant's participation in the scheme intended to or potentially could have resulted in a financial loss to the institution.

4. Engaged in a scheme to defraud a financial institution.

5. Did so with the intent to deceive.

6. Materially affected the financial institution.

If you are unsure about any of these elements, you must find the Defendant NOT GUILTY.

Verdict

Charge 18: Bank Fraud

Guilty * Not Guilty * Acquitted

Are you sure the Defendant knowingly participated in a scheme to defraud a bank beyond a reasonable doubt?

Yes

No

If you answered "Yes" to Charge 18, please answer the following question:

Are you sure about your decision?

Yes

No

If you answered "No," please explain your doubt briefly. _____