IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLORADO

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. $10,000.00 IN UNITED STATES CURRENCY SEIZED FROM J.P. MORGAN CHASE BANK ACCOUNT #359920250,

Defendant.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by and through United States Attorney Peter McNeilly and Assistant United States Attorney Kurt J. Bohn, pursuant to Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions G(2), states:

JURISDICTION AND VENUE

1. The United States of America (the United States) has commenced this action pursuant to the civil forfeiture provisions of 18 U.S.C. §§ 981(a)(1)(C) and 984, seeking forfeiture of defendant property based on violations of 18 U.S.C. § 641 (theft of public funds), and 18 U.S.C. § 1343 (wire fraud). This Court has jurisdiction under 28 U.S.C. §§ 1345 and 1355.

2. Venue is proper under 28 U.S.C. § 1395, as some of the acts described herein occurred in the District of Colorado.

DEFENDANT PROPERTY

3. Defendant property is more fully described as: $10,000.00 in United States currency seized from J.P. Morgan Chase (JPMC) account #359920250 ("defendant $10,000.00"), seized on March 10, 2026. The account was in the name of "Cecilia D Bryant." Defendant $10,000.00 is currently in the custody of the United States Postal Inspection Service.

FACTUAL BASIS FOR FORFEITURE

4. Except as otherwise noted, all the following facts and information have been discovered through my own investigation and the observations and investigations of fellow law enforcement officers as reported to me.

BACKGROUND INFORMATION

5. On March 27, 2020, the President of the United States signed into law the Coronavirus Aid, Relief, and Economic Security (CARES) Act, which provided emergency assistance, administered by the Small Business Association (SBA), to small business owners suffering adverse economic effects caused by the Coronavirus (COVID-19) pandemic. The CARES Act established several new temporary programs and expanded existing programs, including programs created or administered by the SBA. Two sources of funding for small businesses were the Paycheck Protection Program (PPP) and the Economic Injury Disaster Loan (EIDL) program. In addition, the CARES act authorized the SBA to issue advances, known as Economic Injury Disaster Grants (EIDG), of up to $10,000 to small businesses. The amount of the EIDG was determined by the number of employees listed on the EIDL application, and the EIDGs did not need to be repaid.

6. In order to obtain an EIDL and/or EIDG, a qualifying business was required to submit an application to the SBA and provide information about its operations, including the business's gross business revenues and cost of goods sold in the twelve months prior to January 31, 2020. The amount of the loan, if approved, was determined based on the information provided concerning the gross revenue and cost of goods sold.

7. JPMC began to identify PPP funds deposited into numerous bank accounts after April 1, 2020, that it suspected constituted proceeds of PPP fraud. After identifying the accounts, JPMC froze the account funds and maintained them as likely proceeds of PPP fraud activity.

8. On March 5, 2021, SBA began allowing sole proprietors and independent contractors to calculate their PPP loan using their gross income amount instead of the net profit on their tax form Schedule C. The maximum loan amount for a sole proprietor with no employees was $20,833 (the PPP program has a cap of $100,000 on the gross income or net profit amount: $100,000 / 12 then multiplied by 2.5 = $20,833).

Ms. Bryant's PPP SBA Loan

9. On April 17, 2021, Ms. Bryant completed and signed a W-9 Form (Request for Taxpayer Identification Number and Certification) that was required by SBA to be considered for a loan. It was found that Ms. Bryant had filed two different Schedule C Forms in 2019. On the first Schedule C, Ms. Bryant states that she has an "Exam Preparation & Tutoring" business with Gross Income of $99,996, Total Expenses of $99,996, and with a Net Profit of $99,996. On the second Schedule C, Ms. Bryant states that she has a "Caterers" business with Gross Income of $99,996, Total

Expenses of $99,996, and with a Net Profit of $99,996, the same exact figures used on the first Schedule C.

10. On April 17, 2021, Capital Plus Financial, LLC executed a PPP SBA Loan with an individual by the name of Cecilia Bryant for $20,832.

Defendant $10,000.00 Seized from J.P. Morgan Chase Account #0250

11. On March 10, 2026, defendant $10,000.00 was seized from JPMC account #0250 by the United States Postal Inspection Service (USPIS) pursuant to a federal seizure warrant.

12. On May 11, 2026, the USPIS received an administrative claim from Cecilia A. Bryant, contesting the administrative forfeiture of the defendant funds. In email correspondence with Ms. Bryant, she states that there is a "significant misunderstanding regarding the origin of these funds." Ms. Bryant goes on to say that, "The $10,000 deposit was not related to an SBA loan or any SBA funding," and "I am very confused as to why the SBA has been referenced throughout this matter, as this situation has never involved an SBA loan, a sole proprietorship, or any business-related funding."

13. Ms. Bryant provided copies of payments to her from "Our Florida" for "Tidal Basin Government Consulting LLC" and "IH4 Property Florida LP," that were dated May 7, 2022, matching the balance but for the wrong year and there is no SBA documentation.

14. Deposit of defendant $10,000.00 was received by JPMC account #0250 on or about June 24, 2020. JPMC confirms that defendant $10,000.00 was EIDG funds.

15. Between on or about April 1, 2020 and May 4, 2022, JPMC identified and froze SBA funds deposited into numerous accounts, defendant $10,000.00 was one of those accounts, as it was suspected to constitute proceeds of fraud.

CONCLUSION

In summary, there is reasonable cause to believe that defendant $10,000.00 constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 641 (theft of public funds), and 18 U.S.C. § 1343 (wire fraud). Therefore, defendant $10,000.00 is subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 984.

VERIFICATION OF GABRIEL CAZARES, SPECIAL AGENT, UNITED STATES SECRET SERVICE

I, Special Agent Gabriel Cazares, hereby state and aver under the pains and perjury that I have read the foregoing Factual Basis for Forfeiture and that the facts and information contained therein are true.

s/ Gabriel Cazares
Gabriel Cazares
Special Agent
United States Secret Service

FIRST CLAIM FOR RELIEF

1. The Plaintiff repeats and incorporates by reference the paragraphs above.

2. By the foregoing and other acts, $10,000.00 seized from J.P. Morgan Chase account number 359920250 constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 641 (theft of public funds). Therefore, defendant $10,000.00 is forfeitable to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 984.

SECOND CLAIM FOR RELIEF

3. The Plaintiff repeats and incorporates by reference the paragraphs above.

4. By the foregoing and other acts, $10,000.00 seized from J.P. Morgan Chase account number 359920250 constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 1343 (wire fraud). Therefore, defendant $10,000.00 is forfeitable to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 984.

WHEREFORE, the United States prays for entry of a final order of forfeiture for the defendant property in favor of the United States, that the United States be authorized to dispose of the defendant property in accordance with law, and that the Court enter a finding of probable cause for the seizure of the defendant property and issue a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465.

DATED this 10th day of August 2026.

///

///

///

Respectfully submitted,

PETER MCNEILLY
United States Attorney

By: *s/ Kurt J. Bohn*
Kurt J. Bohn
Assistant United States Attorney
United States Attorney's Office
1801 California Street, Suite 1600
Denver, Colorado 80202
Telephone: 303-454-0100
Fax: 303-454-0405
Email: tonya.andrews@usdoj.gov