UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-60168-CR-DIMITROULEAS/HUNT

UNITED STATES OF AMERICA

Plaintiff,

vs.

CONRAD BRANDON BERNARD,

Defendant.

/

STIPULATED FACTUAL BASIS

The United States of America and CONRAD BRANDON BERNARD ("Defendant") agree that, had this case proceeded to trial, the United States would have proven the facts described below, among others, beyond a reasonable doubt, and that the described facts are true and correct and meet the elements of the offenses charged in the Superseding Information.

COVID-19 Economic Injury Disaster Loans

One of the government's responses to the COVID-19 outbreak was an expansion of an existing disaster-related program—the Economic Injury Disaster Loan (EIDL)—to provide for loan assistance for small businesses and other eligible entities for loans. Intially, the loans were capped at $150,000. EIDL funds were issued directly from the United States Treasury, and applicants applied through the SBA via an online portal and application. To obtain an EIDL and advance, a qualifying business was required to submit an application to the Small Business

Administration (SBA) and provide information about its identity and operations. Applicants electronically certified that the information provided was accurate and were warned that any false statement or misrepresentation to the SBA or any misapplication of loan proceeds may result in sanctions, including criminal penalties. Applicants also completed loan agreements with the SBA to receive the EIDL funds.

Unemployment Insurance

The U.S. Department of Labor's unemployment insurance programs provide unemployment benefits to eligible workers who become unemployed through no fault of their own and meet certain other eligibility requirements. Unemployment insurance is a joint state-federal program that provides cash benefits to eligible workers. Each state administers a separate unemployment insurance program, but all states follow the same guidelines established by federal law.

To receive unemployment insurance benefits, an individual generally files a claim with the unemployment insurance program in the state where that individual worked. When a claim is filed, an applicant will be asked for certain information including the applicant's personal identification information, such as name, date of birth, and social security number.

Bank Fraud Scheme

Beginning as early as in or around May 2020 and continuing through on or about December 2022, the Defendant, Conrad Brandon BERNARD (BERNARD) engaged and executed a scheme to defraud Wells Fargo Bank NA (Wells Fargo) and TD Bank, N.A. (TD Bank) for personal gain by using the name and personal identification information (PII) of other individuals without their knowledge or consent to create accounts at Wells Fargo and TD Bank and then fraudulently impersonate those individuals for the purpose of transferring or withdrawing funds owned by or under the custody or control of Wells Fargo and TD Bank.

BERNARD accomplished this scheme by fraudulently applying for fourteen (14) separate EIDLs using the name and PII of other individuals without their knowledge or consent. Once the SBA approved the fraudulent applications, the SBA transferred the EIDL funds to various Wells Fargo bank accounts at BERNARD's direction. BERNARD opened and operated these Wells Fargo accounts with the name and PII of other individuals without those individuals' knowledge or consent. BERNARD then transferred those funds from the Wells Fargo bank accounts to other accounts under his control including various Robinhood accounts he created using the name and PII of other individuals without their knowledge or consent. In one instance, on July 28, 2020, BERNARD transferred $50,000 of EIDL funds from Wells Fargo Account ending in 4245, which BERNARD opened and operated using the name and identity of R.B. without R.B.'s knowledge or consent to a Robinhood account ending in 9379, which was opened using the name and PII of B.P. without B.P.'s knowledge or consent.

BERNARD also accomplished his scheme by transferring or withdrawing fraudulently obtained unemployment benefit funds from Wells Fargo accounts he opened and operated using the name and PII of other individuals without their knowledge or consent. These unemployment benefits were paid from several states including West Virginia and Arizona. The unemployment benefit funds were fraudulently obtained because the name and PII of other individuals were used to apply for the unemployment benefits without those individuals' knowledge or consent.

In all, BERNARD fraudulently obtained $1,083,340 in EIDL funds and unemployment benefits and transferred and/or withdrew those criminally derived proceeds to and/or from Wells Fargo accounts ending in 5375, 4245, 5268, 3481, 2318, 9488, 9990, 2894, 4172, 7265, 6550, 3644, 0406, 1824, 6920, and 9545, which BERNARD opened and operated using the name and PII of other individuals without their knowledge or consent. From there, BERNARD caused at least a portion of the criminal proceeds to ultimately come to rest in Robinhood Markets, Inc. accounts ending in 7297, 2624, 6985, 4559, 8309, 3090, 1496, 8737, 0958, 5740, 4165, and 9379, and in Wells Fargo accounts ending in 7625 and 7062, which BERNARD opened and operated using the name and PII of other individuals without their knowledge or consent.

Traffic Stop, Vehicle Search, and Search Warrants

On 05/13/2022, law enforcement conducted a lawful traffic stop of BERNARD and search of BERNARD's vehicle. In BERNARD's vehicle, BCSO officers found two TD Bank debit cards in the name of D.E. and U.S, which were opened and used by BERNARD without the knowledge or consent of D.E. and U.S. Specifically, TD Bank debit card ending in 9603, which was in the name of U.S., was able to withdraw funds from a TD Bank account ending in 9833, which also was in the name of U.S.

and opened without U.S.' knowledge or consent. BERNARD defrauded TD Bank by impersonating U.S. when using TD Bank debit card ending in 9603 to withdraw $1,003.00 from TD Bank account ending in 9833 on July 5, 2022.

During the vehicle search, law enforcement found numerous items including several laptops and iPhones, a Zebra ZXP Series 7 printer with approximately 16 blank cards contained within a partially closed black bag, an HP Envy 4520 scanner/printer with a counterfeit U.S. Passport Card in the scanner bed of the HP Envy 4520.

Later that day, law enforcement obtained a lawful search warrant to search a Broward County residence that BERNARD leased. During that search, law enforcement found numerous items including, but not limited to:

- 2 Counterfeit U.S. Passport Cards;
- 2 Social Security Cards in the names of other individuals;
- 43 Florida Identification Cards or Driver's Licenses containing a photograph of a black male with various identities;
- 33 Florida Identification Cards or Driver's Licenses containing a photograph of a second black male with various identities;
- 29 Humana Insurance cards in the name of different individuals;
- 31 W-2s in different identities;
- 501 blank cards;
- 1 Blue HP Laptop; and
- 1 Rose Gold Apple iPhone (S/N: unknown).

Law enforcement later obtained search warrants to search the electronic items seized from BERNARD's vehicle and leased residence. The search showed that these devices contained the PII of several thousand separate individuals, including their name, date of birth, social security number, and bank account numbers. Many of these individuals resided outside the State of Florida, and several of their names and PII were used to obtain the aforementioned EIDLs and unemployment benefits.

Wells Fargo Bank and TD Bank are financial institutions with deposits insured by the Federal Deposit Insurance Corporation.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date: 11/15/24 By: ______________________
DERIC ZACCA
ASSISTANT UNITED STATES ATTORNEY

Date: 11/15/24 By: ______________________
CHAD PIOTROWSKI 33507
ATTORNEY FOR DEFENDANT

Date: 11/15/24 By: Bernard
CONRAD BRANDON BERNARD
DEFENDANT