UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	
v.	**CRIMINAL NO.**
OWEN M. GRIGSBY and	**VIOLATION: 18 U.S.C § 371**
HIMMEH KUAWOGAI,	
Defendants.	

INFORMATION

The United States Attorney charges that:

COUNT ONE

1. From at least in or about July 2020, through in or about December 2023, in the District of Columbia and elsewhere, the Defendants:

Owen M. Grigsby and
Himmeh Kuawogai,

did knowingly and willfully combine, conspire, confederate, and agree with each other to commit an offense against the United States, that is: wire fraud, by engaging in a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 371.

Object of the Conspiracy

2. It was an object of the conspiracy for the defendants to enrich themselves by obtaining money to which they were not entitled.

Manner and Means

3. It was part of the conspiracy that the Defendants agreed with each other to file applications with the United States Small Business Administration ("SBA") that contained false and misleading information for the purpose of obtaining Economic Injury Disaster Loans ("EIDLs").

4. It was part of the conspiracy that the Defendants agreed with each other to file applications with Harvest Small Business Finance, LLC ("HSBF"), that contained false and misleading information, for the purpose of obtaining two Paycheck Protection Program ("PPP) loans and to have those loans forgiven.

Overt Acts

5. In furtherance of the conspiracy and to effect the object thereof, the defendants, committed the following overt acts, among others, in the District of Columbia and elsewhere:

a. Between July 2020 and present day, Grigsby, knowingly and willfully, filed with the SBA two EIDL applications on behalf of Owen Grigsby Associates, LLC ("OGA") containing materially false statements. Kuawogai assisted Grigsby with these fraudulent loan applications by providing Grigsby with amended and fake documents and explaining the loan application process to Grigsby via messaging applications, the phone, and email.

b. As a result of his fraudulent and misleading applications, on or about October 12, 2020, Grigsby signed and executed a loan agreement with the SBA for the amount of $53,700.00, which caused the SBA to disburse a $53,600.00 loan to OGA's Bank of America Account ending in -9614 on or about October 20, 2020.

c. Between July 2020 and present day, Kuawogai helped Grigsby to submit two PPP loan applications on behalf of OGA containing materially false statements to HSBF, a FDIC insured financial institution that engages in interstate commerce. Kuawogai assisted Grigsby with these loan applications by providing him with amended and fake documents and explaining the loan application process to him via messaging applications, the phone, and email.

d. As a result of Grigsby's first fraudulent and misleading PPP loan application, HSBF approved Grigsby's loan application for OGA for $20,833.00 causing HSBF to disburse $20,833.00 into OGA's Bank of America account ending in -9614 on April 20, 2021.

e. As a result of Grigsby's second fraudulent and misleading PPP loan application, HSBF approved Grigsby's "Second Draw" loan application for OGA for $20,833.00, causing HSBF to disburse $20,833.00 into OGA's Bank of America account ending in -9614 on or about May 5, 2021.

(All in violation of Title 18 United States Code Section 371)

Respectfully submitted,

/s/ *Rebecca G. Ross*
Rebecca Ross (N.Y. BAR #5590666)
Assistant United States Attorney
601 D Street N.W.
Washington, D.C. 20530
Rebecca.Ross2@usdoj.gov
(202) 815-8982