UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	**CRIMINAL NO. 22-206**
v.	*	**SECTION: "J"**
SHARNAE EVERY **a.k.a. "Isabelle Faith"** **a.k.a. "Kaitlyn Known"**	* *	

* * *

FACTUAL BASIS

Should this matter have gone to trial, the government would have proved through the introduction of reliable testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in Count 1 of the Indictment now pending against the defendant, **SHARNAE EVERY ("EVERY")**, charging her with Conspiracy to Commit Mail Fraud in violation of Title 18, United States Code, Section 1349.

The government would establish that the case against **EVERY** developed as a result of a referral from the Pandemic Response Accountability Committee ("PRAC") on October 18, 2021, regarding possible fraudulent Paycheck Protection Program loans ("PPP"). Investigators determined there were at least 110 PPP sole proprietor loan applications in and around the Thibodeaux area and they all had the same invoice to Shelita White from the "Natural Hair Afro, LLC, Houma, LA 70360" and federal tax forms ("Schedule C") with the same business and amounts.

The investigation revealed that **EVERY** created a fictitious business called "Natural Hair Afro, LLC, Houma, LA 70360" and used this fictitious business name on nearly all of the fraudulent PPP loan applications. **EVERY** advertised under various aliases on Facebook to recruit

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individuals to obtain money from the PPP program. **EVERY** prepared and submitted false and fraudulent PPP sole proprietor loan applications via various online portals including, but not limited, to Blueacorn. **EVERY** created all of the false and fraudulent invoices, bank statements, and federal tax forms Schedule C. **EVERY** falsely certified that the applications and the information provided in the supporting documents were true and accurate when she electronically submitted the fraudulent PPP loan applications.

EVERY charged $45.00 to $120.00 from the individuals she recruited to prepare and submit the fraudulent PPP application. **EVERY** primarily used Cash App to receive the initial payments. **EVERY** then charged $3,500.00 once the loans were funded. **EVERY** received these funds into her Current account, her Cash App account, or into her boyfriend's Current account, ("Co-Conspirator A"). In total, **EVERY**, Co-Conspirator A, and others defrauded the Small Business Administration (SBA) and other designated financial institutions of approximately $1,142.041.00 through submission of approximately 110 fraudulent PPP loan applications.

Individual A's PPP Loan

On March 15, 2021, Individual A, responded to a Facebook posting of **EVERY's** and, as a result, activated and established Current account ending xxxx. That same day, **EVERY** completed Individual A's PPP loan application and submitted it to the Blueacorn portal. The loan application contained a fraudulent invoice and Schedule C in the name of Individual A. As a result of opening the Current account, Current card ending xxxx was mailed via the USPS from Nashville, TN to Individual A at C*** Solar Trlr Park, Thibodaux, LA 70301.

On March 21, 2021, Blueacorn submitted Individual A's PPP loan application to the SBA's designated financial institution, Capital Plus, and, on March 23, 2021, Individual A's PPP loan application was approved. On March 23, 2021, Individual A activated Current card ending xxxx.

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On March 25, 2021, Individual A's PPP final loan documents were electronically signed via DocuSign. On April 1, 2021, Capital Plus deposited $20,832.00 into Individual A's Current account ending xxxx and then Individual A sent Co-Conspirator A $3,500.00 from the proceeds of the PPP loan.

On April 7, 2022, Veterans Administration, Office of Inspector General ("VA OIG") Special Agents interviewed Individual A. Individual A said she heard about PPP loans on Facebook and that her cousin, **EVERY**, filled out her PPP loan application. She paid **EVERY** $3,000 to complete the application. Individual A did not know the PPP money was a loan. Individual A thought the money was "owed" to her. **EVERY** told Individual A the money was "free" and everyone was getting the money because of the pandemic.

<u>Individual B's PPP Loan</u>

On March 18, 2021, Individual B, responded to a Facebook positing of **EVERY's** and, as a result, activated and established Current account ending xxxx. That same day, Current mailed Individual B's Current card ending xxxx via the USPS from Nashville, TN to *** Mall Circle Apt. **, Houma, LA 70364. The next day, **EVERY** submitted Individual B's PPP loan application to the Blueacorn portal containing a fraudulent invoice and Schedule C in the name of Individual B. Then on March 20, 2021, Blueacorn submitted Individual B's PPP loan application to the SBA's designated financial institution, Capital Plus. On March 23, 2021, Individual B's PPP loan application was approved by Capital Plus. On March 26, 2021, Individual B's final loan documents were electronically signed via DocuSign and, on April 2, 2021, Individual B activated her Current card ending xxxx.

On April 2, 2021, Capital Plus deposited $20,832.00 into Individual B's Current account ending xxxx as a result of the submission of the fraudulent PPP application. That same day,

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Individual B sent Co-Conspirator A $2,000.00 and sent **EVERY** $1,500.00 via Cash App from the proceeds of the fraudulent PPP loan.

VA OIG agents interviewed Individual B on April 7, 2022. Individual B said she heard about PPP loans on Facebook. Individual B said **EVERY** filled out all the paperwork for her. Individual B paid **EVERY** approximately $3,000 for completing the PPP loan. According to Individual B, **EVERY** signed all of the loan documents.

Limited Nature of Factual Basis and Conclusion

This proffer of evidence is not intended to constitute a complete statement of all facts known by **EVERY** and/or the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for her guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **EVERY**.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, *inter alia*, VA OIG Special Agents, the victims, other law enforcement officers, and computer forensic examiners from VA OIG, as well as from admissible tangible evidence in the custody of VA OIG.

READ AND APPROVED:

3/2/23	
BRIAN M. KLEBBA Assistant United States Attorney	(Date)
3/2/23	
JOHN HALL THOMAS Counsel for Defendant	(Date)
3/2/23	
SHARNAE EVERY Defendant	(Date)

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