IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA	)	
	)	DOCKET NO. 3:25-CR-106-KDB
v.	)	
	)	**FACTUAL BASIS**
(2) TIJEMA BROWN	)	
	)	

NOW COMES the United States of America, by and through Dallas J.E. Kaplan[1], First Assistant United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

TB 1. Beginning in or around April 2020 and continuing through in or around at least September 2021, in Mecklenburg County within the Western District of North Carolina and elsewhere, Defendant Tijema BROWN ("BROWN") did knowingly combine, conspire, confederate, and agree with Tiawana Brown and Antionette Rouse to commit wire fraud, in violation of Title 18, United States Code, Section 1349. BROWN willfully joined and participated in the conspiracy while knowing its unlawful purposes and with the intent to further its unlawful purposes.

TB 2. It was a part and an object of the conspiracy that BROWN, Tiawana Brown, and Antionette Rouse, with the intent to defraud, did knowingly and intentionally devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts, and for the purpose

[1] Acting under authority conferred by 28 U.S.C. § 515.

of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate commerce any writing, signal, picture, and sound, *to wit*, electronic loan and loan forgiveness applications to the Small Business Administration and Paycheck Protection Program lenders, note documents to the same, wire transfers, and other electronic financial transactions, in violation of Title 18, United States Code, Section 1343.

TB

3. Between April 2020 and September 2021, BROWN, Tiawana Brown, and Antionette Rouse conspired to execute a wire fraud scheme to defraud the Small Business Administration's (SBA) Economic Injury Disaster Loan (EIDL) program and its Paycheck Protection Program (PPP) to obtain COVID-19 pandemic relief funds through the submission of loan applications for fake businesses, which contained false information or false documentation. The false documentation generally included fake and fraudulent tax forms that lied about gross income and number of employees, among other misrepresentations.

TB

4. On or about June 25, 2020, BROWN submitted and caused to be submitted EIDL application *8889 to the SBA via an online submission in the name of a fake sole proprietorship business in the name Tijema Brown. In the application, BROWN falsely represented that her business was a "personal services" business with 11 employees and $14,300 in gross revenues from 2019. BROWN certified under penalty of perjury that the information in EIDL application *8889 was correct and that she would use the funds as directed by the EIDL program. Upon receipt of EIDL application *8889, the SBA approved a $10,000 advance on the loan application. On or about June 30, 2020, the SBA wired $10,000 to a bank account in the name of BROWN ending in *2364 pursuant to the EIDL application.

TB

5. On or about August 31, 2020, BROWN submitted and caused to be submitted EIDL application *1392 to the SBA via an online submission in the name of a fake sole proprietorship business in the name La'Stephanie Brown. In the application, BROWN falsely represented that the business was a "health services" business with 5 employees and $134,000 in gross revenues from 2019 that had operated since March 3, 2017, at the same address as the prior application. La'Stephanie was the middle name of BROWN. EIDL application *1392, in the name La'Stephanie Brown, included BROWN's social security number, BROWN's bank account ending in *2364, and Tiawana Brown's phone number. BROWN certified, as "La'Stephanie Brown," under penalty of perjury that the information in EIDL application *1392 was correct and that they would use the funds as directed by the EIDL program. The SBA rejected this loan application.

TB

6. On or about August 17, 2021, BROWN submitted and caused to be submitted EIDL application *7105 to the SBA via an online submission in the name of a fake sole proprietorship business in the name Tijema Brown. In the application, BROWN falsely represented that her business was an "entertainment services" business with 2 employees and $15,500 in gross revenues from 2019 that had operated since May 25, 2017. BROWN certified under penalty of perjury that the information in EIDL application *7105 was correct and that she would use the funds as directed by the EIDL program. The SBA rejected this loan application.

TB 7. Lender 1 was a California-based small business lending company. Lender 1 participated in the SBA's PPP as a lender and, as such, was authorized to lend funds to eligible borrowers under the terms of the PPP. On or about April 3, 2021, BROWN submitted and caused to be submitted a PPP application for a fake business with respect to a PPP loan numbered *8703 to Lender 1. In the application materials, BROWN falsely stated that she operated a sole proprietorship business in her own name that was established on January 1, 2020, which generated $106,600 in gross income in 2019.

TB 8. As part of the application, BROWN submitted a fake 2019 Internal Revenue Service (IRS) Schedule C Form for the purported business. The fake Schedule C Form was in the name of TIJEMA BROWN under the business name Givin Looks By Jema. The form falsely stated that the business earned $106,600 in gross receipts and had $10,350 in expenses, resulting in $96,250 in net profits in 2019. This form was fake, as it was never filed with the IRS, and no such business existed. This fake IRS Schedule C Form was identical to the 2019 Schedule C Form later submitted for PPP loans by Tiawana Brown and Antionette Rouse, other than business identity information. BROWN, Tiawana Brown, and Antionette Rouse used the same fake Schedule C form for their respective PPP applications.

TB 9. In her application, BROWN stated that she would use the loan funds to pay payroll costs. BROWN certified under penalty of perjury that the information in the PPP application was true and correct. As a result of PPP loan *8703, Lender 1 wired $20,833 in PPP loan funds to BROWN to her bank account ending in *2364 on April 16, 2021. On or about August 20, 2021, the SBA reimbursed Lender 1 and forgave BROWN for this loan based on BROWN's false representation under penalty of perjury that she spent $12,500 of the loan funds on payroll costs for the fake business and complied with all applicable PPP rules, including those regarding the eligible uses of PPP loan proceeds.

TB 10. On or about April 26, 2021, TIJEMA BROWN submitted and caused to be submitted a second draw PPP application for a loan numbered *8907 to Lender 1. The application materials contained the same false information and false documentation as PPP loan *8703 in the name Tijema Brown and Givin Looks By Jema, including the fake 2019 IRS Schedule C Form in the name of Givin Looks By Jema. In her application, TIJEMA BROWN stated that she would use the loan funds to pay payroll costs. TIJEMA BROWN certified under penalty of perjury that the information in the PPP application was true and correct. As a result of PPP loan *8907, Lender 1 wired $20,833 in PPP loan funds to TIJEMA BROWN to her bank account ending in *2364 on May 10, 2021. On or about August 24, 2021, the SBA reimbursed Lender 1 and forgave TIJEMA BROWN for this loan based on TIJEMA BROWN's false representation under penalty of perjury that she spent $12,500 of the loan funds on payroll costs for the fake business and complied with all applicable PPP rules, including those regarding the eligible uses of PPP loan proceeds.

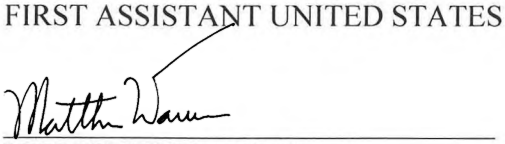
TB 11. On or about April 26, 2021, Tiawana Brown submitted and caused to be submitted a PPP application for a loan numbered *8906 to Lender 1. Tijema BROWN assisted Tiawana Brown in the submission of this application. In the application materials, Tiawana Brown falsely stated that she operated a sole proprietorship business in her own name that was established on

January 1, 2020, which generated $106,600 in gross income in 2019. As part of the application, Tiawana Brown submitted and caused to be submitted a fake 2019 IRS Schedule C Form for the purported business. The fake Schedule C Form was in the name of Tiawana Brown under the business name TC Collection. The form falsely stated that TC Collection earned $106,600 in gross receipts and had $10,350 in expenses, resulting in $96,250 in net profits in 2019. This form was fake, as it was never filed with the IRS. This fake 2019 Schedule C Form was identical to the 2019 Schedule C Forms submitted for PPP loan *8703 and PPP loan *8804 under the business names Givin Looks By Jema (owned by Tijema BROWN) and Antionette Rouse, respectively, other than business identity information. In the application, Tiawana Brown stated that she would use the loan funds to pay payroll costs. Tiawana Brown certified under penalty of perjury that the information in the PPP application was true and correct. As a result of PPP loan *8906, Lender 1 wired $20,833 in PPP loan funds to Tiawana Brown to her bank account ending in *5776 on May 5, 2021. On or about August 24, 2021, the SBA reimbursed Lender 1 and forgave Tiawana Brown for this loan based on Tiawana Brown's false representation under penalty of perjury that she spent $12,500 of the loan funds on payroll costs for the purported business and complied with all applicable PPP rules, including those regarding the eligible uses of PPP loan proceeds.

TB 12. As a result of the wire fraud conspiracy, BROWN received $51,666 in fraud proceeds from the SBA and the PPP lenders. BROWN aided Tiawana Brown in submitting a false application to a PPP lender, which resulted in Tiawana Brown receiving $20,833 in fraud proceeds. Thus, the conspiracy, to the extent to which BROWN was involved, caused losses greater than $40,000 but less than $95,000.

TB 13. BROWN spent the PPP and EIDL funds on personal expenditures, in violation of the PPP and EIDL loan terms.

DALLAS J.E. KAPLAN
FIRST ASSISTANT UNITED STATES ATTORNEY



MATTHEW WARREN
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Indictment, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Indictment, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.

James Quander, Attorney for Defendant

DATED: 3/24/2026