IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA GAINESVILLE DIVISION

UNITED STATES OF AMERICA

v. **Case No: 1:24cr17-AW-MAL**

FELICIA GRACE

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STATEMENT OF FACTS

THE UNITED STATES OF AMERICA, by and through the undersigned Assistant United States Attorney, provides this factual basis for the acceptance of the guilty plea of Defendant Felicia Grace ("Defendant"). Should this case proceed to trial, the government is prepared to present evidence as follows:

In or around March 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was enacted. It was designed to provide emergency financial assistance to the millions of Americans who were suffering from the economic effects caused by the COVID-19 pandemic. During the period of time including April of 2021, the California Employment Development Department ("CA EDD") Unemployment Insurance program was funded in part by the federal CARES Act.

On or about December 28, 2020, the Defendant created and caused the creation of an account with the CA EDD. As part of the application process, the

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Defendant underwent verification by a third party company, ID.me, which was designed to verify the identity of applicants, and provided a phone number, date of birth, photograph of herself, and a photograph of her driver's license. Following verification, the Defendant caused to be submitted an application in support of unemployment insurance benefits through the CA EDD. The submission of the Defendant's unemployment insurance application was completed via the internet, and as such the submission of this application constituted a wire communication transmitted in interstate commerce.

The Defendant's CA EDD unemployment insurance application contained material false statements, including representations that the Defendant had worked in Fresno, California as a taxi driver and was forced to stop working due to the COVID-19 pandemic. In reality, and as the Defendant knew, the Defendant has never lived or worked in the state of California, and was not entitled to unemployment insurance benefits from the CA EDD. Through the false statements contained in her application, the Defendant received $17,456 in CA EDD UI funds to which she was not entitled.

ELEMENTS OF THE OFFENSE-COUNT ONE

(1) the Defendant knowingly devised or participated in a scheme to defraud, or to obtain money or property by using false pretenses, representations, or

promises;

(2) the false pretenses, representations, or promises were about a material fact;

(3) the Defendant acted with the intent to defraud; and

(4) the Defendant transmitted or caused to be transmitted by wire some communication in interstate commerce to help carry out the scheme to defraud.

DARREN JOHNSON, ESQ.
Attorney for Defendant

10/15/2024
Date

FELICIA GRACE
Defendant

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