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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	NO. 3:22-CR-00419-S
v.	
ANNETTE BRYANT (01)	

SUPERSEDING INFORMATION

The United States Attorney charges:

Count One
Conspiracy to Make a False Statement to a Bank
(Violation of 18 U.S.C. § 371 (18 U.S.C. § 1014))

1. From at least in or about April 2020 through in or about April 2021, the defendant, **Annette Bryant**, and others both known and unknown to the United States Attorney, in the Northern District of Texas and elsewhere, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to make a false statement for the purpose of influencing the actions of financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC), in violation of 18 U.S.C. § 1014.

Introduction and Parties

2. The defendant, **Annette Bryant**, was a resident of Waxahachie, Texas, in the Dallas Division of the Northern District of Texas.

3. Processing Services, Inspirational Tax Services LLC (Processing) was a Texas limited liability company. **Annette Bryant** was Processing's registered agent and sole owner.

4. Neighborhood Tx Inspections LLC (Neighborhood) was a Texas limited liability company. **Annette Bryant** was Neighborhood's registered agent and sole owner.

5. JJ&JJ Remodeling and Roofing LLC (JJ&JJ) was a Texas limited liability company. **Annette Bryant** was JJ&JJ's registered agent and sole owner.

6. JAM Business & Tax Services LLC (JAM) was a Texas limited liability company. **Annette Bryant** was JAM's registered agent and sole owner.

7. Community National Bank & Trust of Texas, Interbank, Regions Bank, Comerica Bank, and First Bank of the Lake were financial institutions the accounts of which were insured by the FDIC.

8. The Paycheck Protection Program (PPP), implemented by the Small Business Administration, was a COVID-19 relief program that, among other things, provided small businesses with forgivable loans to pay for payroll and certain other expenses. Under the PPP, participating third-party lenders approved loan applications and disbursed PPP loans to qualifying businesses.

9. To obtain a PPP loan, a business was required to submit a PPP loan application to a third-party lender. In the PPP loan application, the business was required to state, among other things, the business's average monthly payroll expenses and its

number of employees. This payroll information was used to calculate the amount of funds that the business was eligible to receive as a PPP loan.

Object of the Conspiracy

10. It was a part and object of the conspiracy for **Annette Bryant** and her coconspirators to unlawfully enrich themselves by submitting and causing the submission of false and fraudulent applications for PPP loans and using the proceeds of the fraud for their personal use.

Manner and Means of the Conspiracy

11. The manner and means by which the defendants sought to effect the objects of the conspiracy included, among others, the following:

a. It was part of the conspiracy that **Annette Bryant**, conspiring with others, prepared and submitted, and caused to be prepared and submitted, false and fraudulent PPP loan applications on behalf of businesses owned and controlled by **Bryant** to financial institutions in which she made multiple materially false and fraudulent representations, such as: (i) falsely stating and inflating the business's number of employees; (ii) misstating and inflating the business's monthly payroll; and (iii) falsely stating the number of businesses that **Bryant** owned or with which she was affiliated.

b. Additionally, **Annette Bryant**, conspiring with others, prepared and submitted, and caused to be prepared and submitted, Internal Revenue Service (IRS) tax documents that were purportedly filed on behalf of her individually and her businesses, including IRS Forms 1040 Individual Income Tax Returns, IRS Forms 940 Employer's Annual Federal Unemployment Tax Returns, and IRS Forms 941 Employer's Quarterly

Federal Tax Returns. However, the forms submitted to the financial institutions had not been filed with the IRS and contained false information regarding **Bryant's** businesses and her personal income.

Overt Acts in Furtherance of the Conspiracy

12. In furtherance of the conspiracy and to effect its object, **Annette Bryant**, conspiring with others, submitted and caused to be submitted PPP loan applications to the financial institutions described below, on or about each of the dates listed below and on behalf of her businesses as listed below, that falsely stated the monthly payroll of the respective entities in order to induce the financial institutions to approve the PPP loans and maximize the amount of each loan:

Date	PPP Applicant	Amount	Financial Institution
5/7/2020	Processing	$102,687.50	Community National Bank & Trust of Texas
5/11/2020	Neighborhood	$116,665.00	Community National Bank & Trust of Texas
5/25/2020	JJ&JJ	$205,580.00	Community National Bank & Trust of Texas
5/25/2020	JJ&JJ	$205,580.00	Interbank
6/22/2020	JAM	$190,900.00	Regions Bank
6/25/2020	JJ&JJ	$205,500.00	Comerica Bank
2/8/2021	Processing	$95,833.33	First Bank of the Lake
4/1/2021	JJ&JJ	$137,000.00	Comerica Bank

All in violation of 18 U.S.C. § 371 (18 U.S.C. § 1014).

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