**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 26-CR-20028
	)	
TITIANNA AMMONS (Also Known As "Titianna Mays," "Tatianna Ammons," and "Titianna Ammons-Brown"),	)	Title 18, United States Code, Section 1343.
	)	
Defendant.	)	

INDICTMENT

COUNT ONE
(Wire Fraud)

THE GRAND JURY CHARGES:

1. Titianna Ammons (AMMONS) at all relevant times was a resident of Champaign County in the Central District of Illinois. From approximately July 15, 2020, to September 30, 2020, AMMONS was employed on a temporary basis by the Champaign-Urbana Public Health District as a Special Projects Assistant for the 2020 United States Census.

2. Unemployment Insurance (UI) is a joint state and federal program overseen by the U.S. Department of Labor that provides monetary benefits to eligible beneficiaries. UI payments are intended to provide temporary financial assistance to lawful workers who are unemployed through no fault of their own. Beginning in or around March 2020, in connection with the presidentially declared major disaster and emergency proclamation

concerning the COVID-19 pandemic, several federal programs expanded UI eligibility and increased UI benefits, including an additional $600 weekly benefit under the Federal Pandemic Unemployment Compensation (FPUC) program that was later reauthorized at $300 per week. These funds were distributed to the states' UI programs from the U.S. Department of the Treasury. Additionally, the Pandemic Emergency Unemployment Compensation (PEUC) program extended the time limit for an individual to receive federally financed UI benefits. Both the FPUC and PEUC expired on September 6, 2021.

3. In the State of Illinois, at all relevant times, the Illinois Department of Employment Security (IDES) based in Springfield, Illinois, administered the state's UI program. Those seeking benefits from IDES submitted online applications. Applicants were required to answer specific questions to establish eligibility to receive UI benefits, including self-certifying that they were unemployed. IDES relied upon the information in the application to determine eligibility for UI benefits. The application required an individualized attestation that the information was true and correct, as well as ongoing weekly certifications attesting whether the benefits recipient had worked that week or received any wages.

4. Once IDES determined an applicant was eligible, it deposited UI benefits into the applicant's bank account via intestate electronic wire through the Automated Clearing House (ACH).

The Scheme to Defraud

5. Beginning on or about October 4, 2020, and continuing until on or about October 4, 2021, in Champaign County, in the Central District of Illinois, and elsewhere,

TITIANNA AMMONS
(Also Known As "Titianna Mays," "Tatianna Ammons," and "Titianna Ammons-Brown"),

defendant herein, knowingly and intentionally devised a scheme and artifice to defraud the U.S. Department of Labor and IDES and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

6. On or about October 4 and 18, 2020, after her temporary Special Projects Assistant position with the Champaign-Urbana Public Health District ended, as part of the scheme to defraud, AMMONS applied for UI benefits stating that she was laid off for lack of work. Based on her application, IDES found she was eligible for UI benefits. IDES paid her UI benefits from on or about October 24, 2020, until on or about September 10, 2021. Beginning on or about January 2, 2021, Ammons's UI benefits included approximately $300 extra per week in FPUC benefits that were authorized, disbursed and paid in connection with the presidentially declared major disaster and emergency proclamation concerning the COVID-19 pandemic.

7. During the time that AMMMONS was receiving UI benefits, she was employed in various capacities and received wages. For example, she received earnings performing work for the Friends of Carol Ammons for State Representative. She received a stipend as a representative on the Champaign County Board. She received a paycheck as

an Executive Assistant for Hood Vote Neighborhood Transformation. She received salary as a Program Director/Coordinator with Bridgewater Sullivan Community Life Center.

8. Nonetheless, as part of the scheme to defraud, in her online certifications with IDES during the time periods that she was receiving UI benefits and also working, AMMONS falsely represented that she did not work and did not receive any wages. As a result, AMMONS received UI benefits to which she was not entitled.

Execution of the Scheme

9. On or about July 14, 2021, in Champaign County in the Central District of Illinois, and elsewhere,

TITIANNA AMMONS
(Also Known As "Titianna Mays," "Tatianna Ammons," and "Titianna Ammons-Brown"),

defendant herein, for the purposes of executing and attempting to execute the above-described scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, did knowingly cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals, sounds, and images, that is, an ACH payment from IDES to her checking account at JP Morgan Chase providing UI benefits to which she was not entitled because she failed to disclose she worked and received wages from the Friends of Carol Ammons and the Champaign County Board.

In violation of Title 18, United States Code, Sections 1343.

COUNT TWO
(Wire Fraud)

THE GRAND JURY CHARGES:

1. The Grand Jury re-alleges and incorporates by reference Paragraphs 1 through 8 of Count One of this Indictment as though fully set forth herein.

Execution of the Scheme

2. On or about August 25, 2021, in Champaign County in the Central District of Illinois, and elsewhere,

TITIANNA AMMONS
(Also Known As "Titianna Mays," "Tatianna Ammons," and "Titianna Ammons-Brown"),

defendant herein, for the purposes of executing and attempting to execute the above-described scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, did knowingly cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals, sounds, and images, that is, an ACH payment from IDES to her checking account at JP Morgan Chase providing UI benefits to which she was not entitled because she failed to disclose that she worked and received wages from Bridgewater Sullivan Community Life Center.

In violation of Title 18, United States Code, Sections 1343.

COUNT THREE
(Wire Fraud)

THE GRAND JURY CHARGES:

1. The Grand Jury re-alleges and incorporates by reference Paragraphs 1 through 8 of Count One of this Indictment as though fully set forth herein.

Execution of the Scheme

2. On or about September 8, 2021, in Champaign County in the Central District of Illinois, and elsewhere,

TITIANNA AMMONS
(Also Known As "Titianna Mays," "Tatianna Ammons," and "Titianna Ammons-Brown"),

defendant herein, for the purposes of executing and attempting to execute the above-described scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, did knowingly cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals, sounds, and images, that is, an ACH payment from IDES to her checking account at JP Morgan Chase providing UI benefits to which she was not entitled because she failed to disclose that she worked and received wages from Bridgewater Sullivan Community Life Center.

In violation of Title 18, United States Code, Sections 1343.

A TRUE BILL.

Redacted

FOREPERSON

Redacted

GREGORY M. GILMORE
United States Attorney
ELM