

SEALED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:25-cr-516-WFJ-CPT

SHERELL E. BREUS,
JESSIE AMEDO PERLADO,
CANDICE NICOLE HARPER,
YASHICA MONIQUE CARTER,
BRANDON JAMES THOMAS,
ANTWAUN QUINN JOHNSON,
JESSICA A. SEJOUR,
TAMESHIA LACIA ROBERSON,
VANCE WARREN HOUSTON, and
RAYMOND CARVIL SR.

18 U.S.C. § 1349

18 U.S.C. § 1343

SEALED

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FILED - USDC - FLMD - TPA

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy to Commit Wire Fraud)

A. Introduction

At times material to this Indictment:

Parties and Entities

1. SHERELL E. BREUS, JESSIE AMEDO PERLADO, CANDICE NICOLE HARPER, YASHICA MONIQUE CARTER, ANTWAUN QUINN JOHNSON, JESSICA A. SEJOUR, TAMESHIA LACIA ROBERSON, VANCE WARREN HOUSTON, and RAYMOND CARVIL SR. used false and fraudulent

information in order to obtain loans from federal government programs to which they were not entitled.

2. A Time Transport, LLC was a purported transportation business located in the Middle District of Florida and owned by BREUS.

3. TLC Affordable Consultants, LLC was a purported home health business located in the Middle District of Florida and owned by BREUS.

4. SaveOurLittleOnes, Inc. was a purported community food services business located in the Middle District of Florida and owned by BREUS.

5. Ella's Senior Care, LLC was a purported health services business located in the Middle District of Florida and owned by BREUS.

6. Prime Time Medical Transport, LLC was a purported transportation business located in the Middle District of Florida and owned by PERLADO.

7. We Care Adult Care, LLC was a purported health services business located in the Middle District of Florida and owned by PERLADO.

8. icaretransport, LLC was a purported transportation business located in the Southern District of Florida and owned by HARPER.

9. Genuine Care Transport, LLC was a purported transportation business located in the Middle District of Florida and owned by CARTER.

10. A to B Transportation, LLC was a purported transportation business located in the Southern District of Florida and owned by THOMAS and JOHNSON.

11. Above and Beyond Transportation, LLC was a purported transportation business located in the Southern District of Florida and owned by SEJOUR.

12. Sudden Success, LLC was a purported health Services business located in the Middle District of Florida and owned by ROBERSON.

13. Broward Shirt Printing, LLC was a purported apparel business located in the Southern District of Florida and owned by HOUSTON.

14. E & C Security Agency, LLC was a purported special needs transportation business located in the Southern District of Florida and owned by CARVIL SR.

15. Financial Institution #1 was headquartered in New York and used computer servers located outside of Florida to process financial transactions through interstate wires. BREUS maintained accounts at Financial Institution #1, including the account ending in 2951.

16. Financial Institution #2 was headquartered in Pennsylvania and used computer servers located outside of Florida to process financial transactions through interstate wires. BREUS maintained accounts at Financial Institution #2, including the account ending in 3147.

17. Financial Institution #3 was headquartered in Virginia and used computer servers located outside of Florida to process financial transactions through interstate wires. BREUS maintained accounts at Financial Institution #3, including

the account ending in 4877.

18. Financial Institution #4 was headquartered in North Carolina.

PERLADO maintained an account at Financial Institution #4 ending in 7196.

19. The United States Small Business Administration (“SBA”) was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses.

COVID-19 Related Programs

20. In or around March 2020, the President declared the ongoing Coronavirus Disease 2019 (“COVID-19”) pandemic of sufficient severity and magnitude to warrant an emergency declaration for all states, tribes, territories, and the District of Columbia pursuant to section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207. The President also signed into law the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act and the Families First Coronavirus Response Act.

21. The SBA enabled and provided for loans through banks, credit unions and other lenders. These loans had government-backed guarantees. In addition to traditional SBA funding programs, the CARES Act established several new temporary programs and provided for the expansion of others to address the COVID-19 outbreak.

Economic Injury Disaster Loan

22. One government response to the COVID-19 outbreak was an expansion of an existing disaster-related program—the Economic Injury Disaster Loan

(“EIDL”)—to provide for loan assistance (including \$10,000 advances) for small businesses and other eligible entities for loans up to \$2 million. The EIDL proceeds could be used to pay certain qualifying expenses (i.e., fixed debts, payroll, accounts payable, and other bills) that could have been paid had the disaster not occurred.

23. EIDL funds were issued directly from the United States Treasury, and applicants applied through the SBA via an online portal and application. The EIDL application process collected information concerning the business and the business owner. Applicants electronically certified that the information provided was accurate and were warned that any false statement or misrepresentation to the SBA or any misapplication of loan proceeds may result in sanctions, including criminal penalties.

Paycheck Protection Program

24. One of the new loan programs was the SBA PPP, which was a loan designed, in part, to provide a direct incentive for small businesses to keep their workers on the payroll. Under this program, the SBA could forgive all or part of the borrowing business’s loans provided that employees were kept on the payroll for eight weeks and borrowers submitted documentation confirming that the loan proceeds were used for certain qualifying business expenses (i.e., payroll, rent, mortgage interest, or utilities).

25. Interested applicants applied through an existing SBA lender or any other participating federally-insured financial institution. The PPP application process required applicants to submit a Borrower Application Form through an SBA approved financial entity. The application contained information as to the purpose of

the loan, average monthly payroll, number of employees, and background of the business and its owner. Applicants were also required to make certain good faith certifications, including that economic uncertainties had necessitated their loan proceeds only for the authorized purposes.

B. The Conspiracy

26. Beginning on an unknown date, but at least as early as in or around April 2020, and continuing through at least in or around June 2021, in the Middle District of Florida and elsewhere, the defendants,

SHERELL E. BREUS,
JESSIE AMEDO PERLADO,
CANDICE NICOLE HARPER,
YASHICA MONIQUE CARTER,
BRANDON JAMES THOMAS,
ANTWAUN QUINN JOHNSON,
JESSICA A. SEJOUR,
TAMESHIA LACIA ROBERSON,
VANCE WARREN HOUSTON, and
RAYMOND CARVIL SR.,

did knowingly and willfully combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury to commit wire fraud, in violation of 18 U.S.C. § 1343.

C. Manner and Means

27. The manner and means by which the conspirators sought to accomplish the conspiracy included, among others, the following:

a. It was part of the conspiracy that the conspirators would and did prepare and submit, and cause to be prepared and submitted, materially false and

fraudulent applications to federal government programs tailored to provide benefits and relief to businesses and workers negatively impacted by the COVID-19 pandemic, including the SBA PPP and EIDL programs.

b. It was further a part of the conspiracy that, in order to induce the SBA and the lenders to fund CARES Act loans, the conspirators would and did prepare and submit, and cause to be prepared and submitted, false and fraudulent applications to the SBA and lenders that included multiple materially false and fraudulent representations and pretenses, including:

i. stating a business name, owner, address, telephone number, number of employees, gross revenue, and business costs, which falsely and fraudulently suggested that this information accurately reflected the operation of the business;

ii. representing and certifying that loan proceeds would be used for business-related purposes; and

iii. fraudulently affirming the truth of statements in the application.

c. It was further a part of the conspiracy that the conspirators would and did submit, and cause to be submitted, fraudulent Department of Treasury – Internal Revenue Service documentation in support of said applications, including:

i. 2019 Form 944 Employer's Annual Federal Tax Return;

ii. 2019 Quarters One through Four Form 941 Employer's Quarterly Federal Tax Return;

- iii. 2019 Form 1040 U.S. Individual Income Tax Return;
- iv. 2019 Form 1040 U.S. Individual Income Tax Return

Schedule C;

- v. 2019 Form W-2 Wage and Tax Statement; and
- vi. 2020 Form 1040 U.S. Individual Income Tax Return

Schedule C.

d. It was further a part of the conspiracy that the conspirators would and did cause the lenders to transmit interstate wires to the SBA in order to receive a PPP loan number for their applications.

e. It was further a part of the conspiracy that the conspirators would and did cause the SBA and the lenders to transmit EIDL and PPP loan proceeds via interstate wire transfers to accounts they controlled.

f. It was further a part of the conspiracy that the conspirators would and did transfer fraudulently-obtained proceeds to other accounts, including accounts belonging to co-conspirators.

g. It was further a part of the conspiracy that the conspirators would and did perform acts and make statements to promote and achieve the scheme and artifice and to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the scheme and artifice and the acts committed in furtherance thereof.

All in violation of 18 U.S.C. § 1349.

COUNTS TWO THROUGH TEN
(Wire Fraud)

A. Introduction

1. The Grand Jury realleges and incorporates Part A of Count One of this Indictment as if fully set forth herein.

B. The Scheme and Artifice

2. Beginning on an unknown date, but at least as early as in or around April 2020, and continuing through at least in or around June 2021, in the Middle District of Florida and elsewhere, the defendants,

SHERELL E. BREUS,
JESSIE AMEDO PERLADO,
CANDICE NICOLE HARPER,
YASHICA MONIQUE CARTER,
BRANDON JAMES THOMAS,
ANTWAUN QUINN JOHNSON,
JESSICA A. SEJOUR,
TAMESHIA LACIA ROBERSON,
VANCE WARREN HOUSTON, and
RAYMOND CARVIL SR.,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises about a material fact.

C. Manner and Means of the Scheme and Artifice

3. The manner and means of the scheme and artifice are set forth in Part C (Manner and Means of the Conspiracy) of Count One of this Indictment, the

allegations of which are realleged and incorporated by reference as if fully set forth herein.

D. Execution of the Scheme and Artifice

4. On or about the date set forth below in each count, in the Middle District of Florida and elsewhere, the defendants, for the purpose of executing the aforesaid scheme and artifice, knowingly and intentionally transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce the writings, signs, signals, pictures, and sounds described below, each transmission constituting a separate count:

Count	Date of Wire	Defendant(s)	Description of Wire
TWO	June 15, 2020	SHERELL E. BREUS and VANCE WARREN HOUSTON	An interstate wire resulting in a \$11,800 deposit of PPP funds into a Financial Institution #1 account ending in 2915
THREE	June 26, 2020	SHERELL E. BREUS and CANDICE NICOLE HARPER	An interstate wire resulting in a \$18,000 deposit of PPP funds into a Financial Institution #2 account ending in 3147
FOUR	July 2, 2020	SHERELL E. BREUS and JESSIE AMEDO PERLADO	An interstate wire resulting in a \$12,105 deposit into a Financial Institution #2 account ending in 3147

FIVE	July 2, 2020	SHERELL E. BREUS and TAMESHIA LACIA ROBERSON	An interstate wire resulting in a \$15,921 deposit into a Financial Institution #3 account ending in 4877
SIX	July 22, 2020	SHERELL E. BREUS and RAYMOND CARVIL SR.	An interstate wire resulting in a \$19,500 deposit into a Financial Institution #2 account ending in 3147
SEVEN	August 25, 2020	SHERELL E. BREUS, ANTWAUN QUINN JOHNSON, and JESSICA A. SEJOUR	An interstate wire resulting in a \$8,500 deposit of EIDL funds into a Financial Institution #2 account ending in 3147
EIGHT	September 18, 2020	SHERELL E. BREUS, BRANDON JAMES THOMAS, and ANTWAUN QUINN JOHNSON	An interstate wire resulting in a \$25,000 deposit of CARES Act funds into a Financial Institution #2 account ending in 3147
NINE	March 28, 2021	JESSIE AMEDO PERLADO	An interstate wire resulting in a \$62,500 deposit of PPP funds into a Financial Institution #4 account ending in 6432
TEN	April 26, 2021	SHERELL E. BREUS and YASHICA MONIQUE CARTER	An interstate wire resulting in a \$2,000 deposit of PPP funds into a Financial Institution #1 account ending in 2915

In violation of 18 U.S.C. §§ 1343 and 2.

FORFEITURE

1. The allegations contained in Counts One through Ten are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, or wire fraud, in violation of 18 U.S.C. § 1343, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

3. The property to be forfeited includes, but is not limited to, an order of forfeiture in the amount of approximately \$2,294,734.50, which represents the proceeds the defendants obtained from the offense.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,



Foreperson

GREGORY W. KEHOE
United States Attorney

By:



Merrilyn E. Hoenemeyer
Assistant United States Attorney

By:



Gregory D. Pizzo
Assistant United States Attorney
Chief, Economic Crimes Section

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

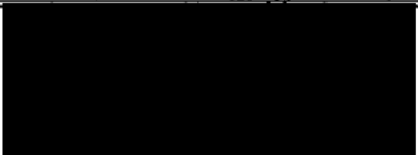
vs.

SHERELL E. BREUS, JESSIE AMEDO PERLADO, CANDICE NICOLE HARPER, YASHICA MONIQUE CARTER, BRANDON JAMES THOMAS, ANTWAUN QUINN JOHNSON, JESSICA A. SEJOUR, TAMESHIA LACIA ROBERSON, VANCE WARREN HOUSTON, and RAYMOND CARVIL SR

INDICTMENT

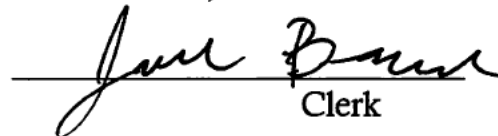
Violations: 18 U.S.C. § 1349, 1343

A true bill,


Foreperson

Filed in open court this 6th day

of November, 2025


Clerk

JULIA BARDAK

Bail \$ _____
