UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA	) **INDICTMENT NO.**
	)
v.	) **18 U.S.C. § 1349**
	) **Conspiracy to Commit Wire and**
ASHLEE PARKER	) **Bank Fraud**
	)
	) **18 U.S.C. § 1343**
	) **Wire Fraud** CR422-100
	)
	) **18 U.S.C. § 1001(a)(3)**
	) **False Document**
	)
	) **18 U.S.C. § 1956(h)**
	) **Money Laundering Conspiracy**
	)
	) **18 U.S.C. § 1001(a)(2)**
	) **False Statement**

THE GRAND JURY CHARGES THAT:

At all times relevant to this Indictment:

INTRODUCTION

1. Beginning in or about May 2020 and continuing until in or about April 2021, **ASHLEE PARKER** led a scheme to defraud the United States by submitting fraudulent Economic Injury Disaster Loan ("EIDL") applications to the U.S. Small Business Administration ("SBA") that contained materially false representations.

2. **PARKER** submitted more than two dozen EIDL applications in her name, the name of various businesses she purportedly owned, and in the names of others. Nearly all of the applications submitted by **PARKER** included false representations designed to obtain fraudulent proceeds from the SBA. For the EIDLs

she submitted for others, she took a percentage of the fraudulent proceeds for her services in orchestrating the fraud.

3. **PARKER** then ran the fraudulent proceeds through her tax preparation business's merchant account in an effort to disguise the nature and purpose of the payment.

4. As a result of **PARKER**'s scheme, the United States was defrauded out of over two million dollars. **PARKER** used the proceeds of her fraud to her own personal benefit, including spending thousands of dollars at luxury stores and paying for a cosmetic surgery procedure for herself.

<u>The Defendant and Her Purported Businesses</u>

5. **PARKER** was an individual residing in Georgia who submitted EIDL applications for individuals in several states, including for several individuals residing in the Savannah Division of the Southern District of Georgia.

6. Proficient Tax, LLC was a Georgia limited liability company owned and controlled by **PARKER**.

7. The Harris Parker Group, LLC was a Georgia limited liability company owned and controlled by **PARKER.**

8. AMP Credit Solutions, LLC was a dissolved Florida limited liability company formerly owned and controlled by **PARKER**.

<u>The COVID-19 Pandemic and the CARES Act</u>

9. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or about March 2020 designed to provide emergency financial

assistance to the millions who are suffering the economic effects caused by the COVID-19 pandemic.

10. Among other relief efforts, the United States sought to provide financial support to eligible businesses that could be used to offset certain business expenses.

11. The SBA was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses. The SBA was headquartered in Washington, DC and maintained its computer servers outside of the State of Georgia. The SBA's mission was to maintain and strengthen the nation's economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters.

12. As part of this effort, the SBA enabled and provided for loans through banks, credit unions, and other lenders. These loans have government-backed guarantees. In addition, the SBA provided loans that came directly from the U.S. Government.

Economic Injury Disaster Loans

13. One source of relief provided by the CARES Act was the authorization for the SBA to provide EIDLs to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic.

14. In order to obtain an EIDL, a qualifying business had to submit an online application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the twelve-month period preceding the disaster, and the cost of goods the business sold in the twelve-month period preceding

the disaster. In the case of EIDLs, the twelve-month period was that preceding January 31, 2020. The applicant also had to certify that all the information in its application was true and correct to the best of the applicant's knowledge.

15. In addition, the CARES Act authorized the SBA to issue advances of up to $10,000 to small businesses within three days of applying for an EIDL ("EIDL Advance"). The amount of the EIDL Advance was determined the number of employees the applicant certified having.

16. EIDL applications were submitted directly to the SBA online at https://covid19relief.sba.gov/#/ and processed by the agency with support from a government contractor, Rapid Finance. The amount of each loan was determined based, in part, on the information provided by the application about employment, revenue, and cost of goods, as described above. Any funds issued under an EIDL were issued directly by the SBA.

17. EIDL funds could be used for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments.

<u>The Paycheck Protection Program</u>

18. Another source of relief provided by the CARES Act was the authorization of up to $349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program ("PPP"). In or around April 2020, Congress authorized over $300 billion in additional PPP funding.

19. In order to obtain a PPP loan, a qualifying business had to submit a PPP loan application signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application, the small business (through its authorized representative) had to state, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures were then used to calculate the amount of money the small business was eligible to receive under the PPP. In addition, a business applying for a PPP loan had to provide documentation showing its payroll expenses.

20. A PPP loan application must be processed by a participating lender, such as a financial institution. If a PPP loan is approved, the participating lender funds the PPP loan using its own monies, which are 100% guaranteed by the SBA. Data from the application, including the information about the borrower, the total amount of the loan, and the listed number of employees, is transmitted by the lender to the SBA in the course of processing the loan.

21. The PPP loan proceeds must be used by the business on certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal of the PPP loan to be entirely forgiven if the business spends the loan proceeds on these expense items within a designated period of time and uses a certain percentage of the PPP loan proceeds on payroll expenses.

COUNT ONE
Conspiracy to Commit Wire and Bank Fraud
18 U.S.C. § 1349

22. The Grand Jury re-alleges and incorporates by reference the factual allegations contained in paragraphs 1 through 21 of this Indictment as if fully set forth herein.

23. Beginning in or about May 2020 and continuing until in or about April 2021, in the Southern District of Georgia, and elsewhere, the Defendant,

ASHLEE PARKER,

with other co-conspirators, known and unknown, did conspire, confederate, and agree with each other to commit the following offenses:

a. wire fraud, that is, to devise and intend to devise a scheme and artifice to defraud individuals and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing this scheme, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce signals and sounds, all in violation of Section 1343 of Title 18 of the United States Code; and

b. bank fraud, that is, to knowingly execute or attempt to execute a scheme and artifice to obtain any of the moneys, funds, credits, assets, securities, and other property under the custody and control of a financial institution by means of false and fraudulent pretenses, representations, and promises, all in violation of Section 1344 of Title 18 of the United States Code.

The Object of the Conspiracy

24. It was the object of the conspiracy for **PARKER** and others to unlawfully enrich themselves by, among other things, obtaining EIDL and PPP proceeds under false and fraudulent pretenses, including by making false statements about the applicant's company's gross revenue, payroll, and formation date.

Manner and Means of Wire Fraud Conspiracy

25. The manner and means by which **PARKER** and others sought to accomplish the object of the wire fraud conspiracy included, among others, the following:

a. On or about June 16, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of a dissolved company she had formerly owned called AMP Credit Solutions, LLC ("EIDL Application 5031"). In connection with EIDL Application 5031, **PARKER** falsely affirmed that AMP Credit Solutions, LLC had earned $382,000 in gross revenue in the twelve months prior to January 31, 2020.

b. On or about June 30, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 1" ("EIDL Application 1616") owned by Individual 1. In connection with EIDL Application 1616, **PARKER** falsely affirmed that Company 1 was established on May 19, 2019 and had earned $287,613 in gross revenue in the twelve months prior to January 31, 2020. Individual 1 received a $88,700 EIDL and a $6,000 EIDL Advance from the SBA based on **PARKER**'s fraudulent submission. Individual 1 then paid **PARKER** several thousand dollars for filling out the application.

c. On or about July 2, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 2" ("EIDL Application 8823") owned by Individual 2. In connection with EIDL Application 8823, **PARKER** falsely affirmed that Company 2 had 10 employees and had earned $316,270 in gross revenue in the twelve months prior to January 31, 2020. Individual 2 received a $113,300 EIDL and a $10,000 EIDL Advance from the SBA based on **PARKER**'s fraudulent submission. Individual 2 then paid **PARKER** several thousand dollars for filling out the application.

d. On or about July 2, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 3" ("EIDL Application 6301") owned by Individual 3. In connection with EIDL Application 6301, **PARKER** falsely affirmed that Company 3 had 10 employees and had earned $348,970 in gross revenue in the twelve months prior to January 31, 2020. Individual 3 received a $136,400 EIDL and a $10,000 EIDL Advance from the SBA based on **PARKER**'s fraudulent submission.

H.L. then paid **PARKER** several thousand dollars for filling out the application.

e. On or about July 3, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 4" ("EIDL Application 9969") owned by Individual 4. In connection with EIDL Application 9969, **PARKER** falsely affirmed that Company 4 had 10 employees and earned $297,520 in gross revenue in the twelve months prior to January 31, 2020.

f. On or about July 8, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 5" ("EIDL Application 5365") owned by Individual 5. In connection with EIDL Application 5365, **PARKER** falsely affirmed that Company 5 had 8 employees and earned $192,840 in gross revenue in the twelve months prior to January 31, 2020. Individual 5 received a $65,200 EIDL from the SBA based on **PARKER**'s fraudulent submission. Individual 5 then paid **PARKER** several thousand dollars for filling out the application.

g. On or about July 10, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 6" ("EIDL Application 4779") owned by Individual 6. In connection with EIDL Application 4779, **PARKER** falsely affirmed that Company 6 was established on January 14, 2019, had 10 employees, and earned $349,400 in gross revenue in the twelve months prior to January 31, 2020. Individual 6 received a $141,300 EIDL from the SBA based on **PARKER**'s fraudulent submission. Individual 6 then paid **PARKER** several thousand dollars for filling out the application.

h. On or about July 14, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 7" ("EIDL Application 8047") owned by Individual 7. In connection with EIDL Application 8047, **PARKER** falsely affirmed that Company 7 was a retail business and had earned $102,840 in gross revenue in the twelve months prior to January 31, 2020. Individual 7 received a $41,000 EIDL from the SBA based on **PARKER**'s fraudulent submission. Individual 7 then paid **PARKER** a percentage of the proceeds for filling out the application.

i. On or about July 14, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 8" ("EIDL Application 5110") owned by Individual 8. In connection with EIDL Application 5110, **PARKER** falsely affirmed that Company 8 was established on July 1, 2019 and had earned $152,030 in gross revenue in the twelve months prior to January 31, 2020.

j. On or about July 16, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 9" ("EIDL Application 2877") owned by Individual 9. In connection with EIDL Application 2877, **PARKER** falsely affirmed that Company 9 was established on June 29, 2019 and had earned $182,100 in gross revenue in the twelve months prior to January 31, 2020. Individual 9 received a $63,200 EIDL from the SBA based on **PARKER**'s fraudulent submission.

k. On or about August 5, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of "Company 10" ("EIDL Application 7516") owned by Individual 10. In connection with EIDL Application 7516, **PARKER** falsely affirmed that Company 10 had earned $157,820 in gross revenue in the twelve months prior to January 31, 2020. Individual 10 received a $65,000 EIDL from the SBA based on **PARKER**'s fraudulent submission.

l. On or about January 11, 2021, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of a company she owned called The Harris Parker Group, LLC ("EIDL Application 7531"). In connection with EIDL Application

7531, **PARKER** falsely affirmed that The Harris Parker Group, LLC had earned $157,800 in gross revenue in the twelve months prior to January 31, 2020.

m. On or about April 29, 2021, **PARKER** submitted, or caused to be submitted, an electronic application for an EIDL from the SBA on behalf of a sole-proprietorship real estate business she owned called "Ashlee Parker" ("EIDL Application 2201"). In connection with EIDL Application 2201, **PARKER** falsely affirmed that her real estate business had earned $217,820 in gross revenue in the twelve months prior to January 31, 2020.

<u>Manner and Means of Bank Fraud Conspiracy</u>

26. The means and manner by which **PARKER** and others sought to accomplish the object of the bank fraud conspiracy included, among others, the following:

a. On or about May 10, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for a PPP loan to a financial institution on behalf of her husband, Individual 11's, business. In connection with this application, **PARKER** submitted, or caused to be submitted, a fake tax document to the financial institution with ginned up numbers. Based on this false information, the financial institution provided Individual 11's business a $20,833 PPP loan.

b. On or about June 28, 2020, **PARKER** submitted, or caused to be submitted, an electronic application for a PPP loan to a financial institution on behalf of a business owned by Individual 12 In connection with this application, **PARKER** submitted, or caused to be submitted, a fake invoice from Individual 12's company. Individual 12's application also falsely claimed that Individual 12 had an average monthly payroll of $8,334. Based on this false information, the financial institution provided Individual 12 a $20,833 PPP loan.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO through EIGHT

Wire Fraud

18 U.S.C. §§ 1343 and 2

27. The Grand Jury re-alleges and incorporates by reference the factual allegations contained in paragraphs 1 through 21 of this Indictment as if fully set forth herein.

28. On or about the dates specified as to each count below, in the Southern District of Georgia, and elsewhere, **PARKER**, aided and abetted by others, did knowingly devise and intend to 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 for the purpose of executing the scheme and artifice and to obtain money and property, caused interstate and foreign wire communications to be made, in furtherance of the scheme and artifice to defraud, as set forth below, each constituting a separate count:

Count	Approximate Date	Description
2	June 30, 2020	Online submission of EIDL Application 1616 on behalf Individual 1
3	July 2, 2020	Online submission of EIDL Application 8823 on behalf of Individual 2
4	July 3, 2020	Online submission of EIDL Application 9969 on behalf of Individual 4
5	July 14, 2020	Online submission of EIDL Application 8047 on behalf of Individual 7
6	July 14, 2020	Online submission of EIDL Application 5110 on behalf of Individual 8
7	July 16, 2020	Online submission of EIDL Application 2877 on behalf of Individual 9
8	August 5, 2020	Online submission of EIDL Application 7516 on behalf of Individual 10

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT NINE
False Document
18 U.S.C. §§ 1001(a)(3) and 2

29. The Grand Jury re-alleges and incorporates by reference the allegations in paragraphs 1 through 21 of this Indictment.

30. On or about August 1, 2020, in the Southern District of Georgia, and elsewhere, the Defendant

ASHLEE PARKER

aided and abetted by others, did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by transmitting to the SBA a tax document that falsely stated that Individual 7 had a Retail-Clothing business, located within the Southern District of Georgia, that earned $102,840 in gross income in 2019 in connection with EIDL Application 8047, when in fact, as **PARKER** then and there well knew, the transmitted tax document contained false data.

All in violation of Title 18, United States Code, Sections 1001(a)(3) and 2.

COUNT TEN
Money Laundering Conspiracy
18 U.S.C. § 1956(h)

31. The Grand Jury re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 21 of this Indictment.

32. From in or about May 2020 up to and continuing until in or about April 2021, in the Southern District of Georgia and elsewhere, the Defendant,

ASHLEE PARKER

and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957.

33. It was part and an object of the conspiracy that **PARKER**, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions that in fact involved the proceeds of specified unlawful activity, that is, the wire and bank fraud schemes and conspiracy charged in Counts One through Eight of this Indictment, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

34. It was also part and an object of the conspiracy that **PARKER**, and others known and unknown, within the United States, knowingly engaged and

attempted to engage in monetary transactions in criminally derived property of a value greater than $10,000.00 that was derived from specified unlawful activity, that is, fraud schemes involving COVID-19 stimulus funds, including EIDL funds and PPP funds, in violation of Title 18, United States Code, Section 1957.

35. In furtherance of the money laundering conspiracy, **PARKER** instructed individuals for whom she obtained fraudulent COVID-19 stimulus funds to launder the funds by designating transactions as payroll. For example, and in furtherance of the conspiracy, on July 3, 2020, **PARKER** was asked by one such individual "Before I accept this money[w]hat can't I do with it?" That individual then texted **PARKER** "I was reading the documents and it wants me to keep receipts, buy American made, etc." **PARKER** replied with a text message on July 4, 2020, stating "Hey friend....ORRRRR you can just pay yourself or whoever and deposit the money into another account and then spend it however 🤷‍♀️." A few days later, **PARKER** instructed that same person that she cannot give **PARKER** a "gift" with the funds, but that person should give **PARKER** "10% of the loan" and that **PARKER** would "run it through my machine as bookkeeping and it'll say from Proficient Tax."

36. Also in furtherance of the money laundering conspiracy, **PARKER** used proceeds of her EIDL and PPP fraudulent schemes to engage in one or more transactions of value greater than $10,000. For example, and in furtherance of the conspiracy, on or about August 12, 2020, **PARKER** transferred $13,955.00 in criminally derived funds to Plastic Surgery Clinic 1 as payment for a breast augmentation procedure and abdominoplasty with flank liposuction that Plastic

Surgery Clinic 1 performed on **PARKER**. **PARKER** then and there knew that the funds used in such transaction were criminally derived proceeds, and in fact were the proceeds of **PARKER**'s EIDL and PPP fraudulent schemes, and that were being held in the name of **PARKER**'s tax business, Proficient Tax, LLC, which had received fraudulent EIDL and PPP funds from others.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT ELEVEN
False Statement
18 U.S.C. § 1001(a)(2)

37. The Grand Jury re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 21 of this Indictment.

38. On or about September 22, 2021, in the Southern District of Georgia, and elsewhere, the Defendant

ASHLEE PARKER

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, during an interview with federal agents about **PARKER** filling out EIDL applications on behalf of clients, **PARKER** falsely stated that she relied on information supplied to her by her clients with respect to gross revenue when filling out the EIDL application with the SBA and that she was paid in the form of a consultation fee for the year for providing business planning services, when in truth and fact as **PARKER** then and there knew, **PARKER** made up gross revenue numbers that she put on her client's EIDL applications and she charged her clients a percentage of the EIDL that they had received, not a consultation fee for business planning services.

All in violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Eight of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(3), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense set forth in Count One of the defendant, **ASHLEE PARKER** shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to a violation.

Additionally, upon conviction of the offenses set forth in Counts Two through Eight defendant, **ASHLEE PARKER** shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(3), any property, real or personal, which represents or is traceable to the gross receipts obtained, directly or indirectly, as a result of the violation.

If any of the property described above, as a result of any act or commission 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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A True Bill.

Foreperson

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