

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

FILED
U.S. DISTRICT COURT
AUGUSTA DIV.

2020 NOV 19 P 4:28

UNITED STATES OF AMERICA)

v.)

JACINTHIA WILLIAMS,)

) INFORMATION NO.

) 18 U.S.C. § 1343

) Wire Fraud

) CR120-109

CLERK 
SO. DIST. OF GA.

THE UNITED STATES ATTORNEY CHARGES THAT:

At times relevant to this Information:

1. JACINTHIA WILLIAMS was an individual residing in the Southern District of Georgia who claimed ownership of two businesses: Williams Credit Solutions, LLC and an unincorporated entity D/B/A "Cynt's Kitchen."

2. D.W., WILLIAMS' husband, was an individual residing in the state of Georgia who purportedly owned an unincorporated entity referred to as "Company 1."

The Coronavirus Aid, Relief and Economic Security Act

3. The United States Small Business Administration ("SBA") is an executive branch agency of the United States government that provides support to entrepreneurs and small businesses. The SBA's mission is 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.

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

5. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act is 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.

6. One source of relief provided by the CARES Act was the authorization for the SBA to provide Economic Injury Disaster Loans ("EIDL") to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic.

7. 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. The amount of the EIDL Advance was determined the number of employees the applicant certifies having.

8. In order to obtain an EIDL and/or EIDL Advance, a qualifying business must submit an online application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the 12-month period preceding the disaster, and the cost of goods sold in the 12-month period preceding the disaster. In the case of EIDLs and EIDL Advances for COVID-19 relief, the 12-month period was that preceding January 31, 2020. The applicant must also certify

all the information the in application is true and correct to the best of the applicant's knowledge.

9. 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 the loan, if the application is approved, is 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 or EIDL Advance are issued directly by the SBA. EIDL funds can be used for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments.

COUNT ONE
Wire Fraud
18 U.S.C. § 1343

10. The allegations of paragraphs 1 through 9 of this Information are hereby realleged and incorporated as if fully set forth herein.

The Scheme

11. From in or about June 17, 2020 commencing through in or about August 18, 2020, in the Southern District of Georgia, Defendant **WILLIAMS**, 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, in violation of Title 18, United States Code, Section 1343.

The Object of the Scheme

12. The object of the scheme described in Paragraph 11 for Defendant, **WILLIAMS**, was to unjustly enrich herself and others by obtaining EIDL proceeds under false and misleading pretenses including by making false statements about the number of individuals her company employed, gross revenues, and the intended use of the loan proceeds.

Manner and Means

13. Between on or about June 17, 2020 and June 30, 2020, **WILLIAMS** applied, or caused the submission of, SBA loans through <https://covid19relief.sba.gov/#/> on behalf of the following businesses with the following representations:

Entity	Gross Revenue in previous 12 months	Number of Employees
Williams Credit Solutions, LLC	\$85,000	1
Cynt's Kitchen	\$88,000	7
Company 1	\$165,000	10

14. Each of the SBA applications submitted by **WILLIAMS** contained representations that **WILLIAMS** well knew were false.

15. Among other false representations, **WILLIAMS** overstated each of the businesses gross revenue in her application. Specifically, **WILLIAMS** represented

- a. in the Williams Credit Solutions, LLC SBA application the business had \$85,000 in gross revenue the prior 12 months when,

as **WILLIAMS** well knew, the business made no more than \$5,000 in the prior 12 months.

- b. in the Company 1 SBA application the business had \$165,000 in gross revenue the prior 12 months when, as **WILLIAMS** well knew, the business made no more than \$5,000 in the prior 12 months.
- c. in the Cynt's Kitchen SBA application the business had \$88,800 in gross revenue the prior 12 months, when as **WILLIAMS** well knew, the business had not been operational since April 2019 (well before COVID-19).

16. In addition, **WILLIAMS** falsely represented that Company 1 had ten employees so that the entity could qualify for a \$10,000 EIDL Advance. In truth, **WILLIAMS** knew that Company 1 had no employees.

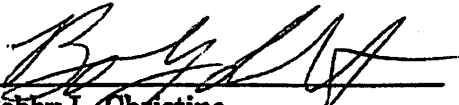
17. In addition, **WILLIAMS** falsely stated that Cynt's Kitchen had seven employees. In truth, **WILLIAMS** knew that Cynt's Kitchen had no employees.

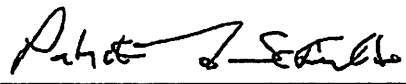
18. In reliance on **WILLIAMS'** false representations, the SBA made the following deposits into accounts (totaling **\$137,500.00**) in the name of **WILLIAMS** and her husband:

	Entity	Bank	Amount
Loan 1	Williams Credit Solutions, LLC	"Bank 1"	\$41,500
Loan 2	Cynt's Kitchen	"Bank 1"	\$20,000
Loan 3	Company 1	"Bank 2"	\$66,000
Loan 4	Company 1	"Bank 2"	\$10,000

19. In addition to the false representations to obtain the loans, **WILLIAMS** used part of the SBA money on purely personal matters, including, for example, the purchase a Louis Vuitton purse, a living room furniture package, and paying thousands of dollars to family members.

All in violation of Title 18, United States Code, Section 1343.


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