IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA *v.* SANTWON ANTONIO DAVIS	Criminal Information No. 1:20-CR-198

THE UNITED STATES ATTORNEY CHARGES THAT:

1. On or about March 22, 2020, in the Northern District of Georgia, the defendant, SANTWON ANTONIO DAVIS, devised and intended to devise a scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, and by the omission of material facts, knowing and having reason to know that said pretenses, representations, and promises were false and fraudulent when made and caused to be made and that said omissions were and would be material.

The Scheme to Defraud

2. At all times material to this information, the defendant was employed by a national company and worked in its facility located in the Northern District of Georgia.

3. The objective of the scheme was for the defendant to obtain funds from the company.

4. To accomplish the unlawful objective of the scheme, the defendant submitted a false and fraudulent claim for benefits to the company.

5. It was part of the scheme that in March 2020, the defendant fraudulently claimed that he had contracted COVID-19. In reliance on the defendant's false and fraudulent representations and in an attempt to protect its employees and the public from the serious public health crisis, the company closed its facility on March 23, 2020, and paid four employees who were required to quarantine themselves because they had been in close contact with the defendant.

Execution of the Scheme

6. On or about March 22, 2020, in the Northern District of Georgia, for the purpose of executing and attempting to execute the scheme and artifice described above, the defendant, SANTWON ANTONIO DAVIS, did, with the intent to defraud, deliver and cause to be transmitted by means of a wire communication in interstate and foreign commerce, certain signs, signals, and sounds, that is an interstate wire in the form of an email from the defendant to the company's Plant Manager, with an attached image of a "work/school excuse letter," in violation of Title 18, United States Code, Section 1343.

Forfeiture Provision

7. As a result of committing the wire fraud offense alleged in this Information, in violation of Title 18, United States Code, Section 1343, the defendant, SANTWON ANTONIO DAVIS, shall forfeit to the United States all property, real and personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

8. If, as a result of any act or omission of defendant DAVIS, property subject to forfeiture

a. cannot be located upon the exercise of due diligence;

b. has been transferred to, 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 intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of other property of the defendant up to the value of the forfeitable property described above.

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