UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	
v.	**CRIMINAL NO.**
KALYNN FIELDS,	**VIOLATION: 18 U.S.C § 1343**
Defendant.	

INFORMATION

The United States Attorney charges that:

COUNT ONE

Background

1. Kalynn Fields (the "Defendant") was employed by The Metropolitan Police Department ("MPD"), the primary law enforcement agency for the District of Columbia. MPD Headquarters is located in Washington, D.C. The Defendant was assigned as a Patrol Officer for the Seventh District, which is located in the Southeast quadrant of Washington, D.C. As a Patrol Officer, the Defendant has various responsibilities, including responding to calls to service, conducting traffic stops, detentions, and arrests, and reporting incidents and offenses that occur in his police service area.

2. MPD officers are sworn to "safeguard the District of Columbia and protect its residents and visitors with the highest regard for the sanctity of human life." MPD officers receive training on policies that guide everyday operations. There is a policy that requires all MPD employees to report all "outside employment" to MPD that could conflict with the execution of their duties. This required MPD employees to fill out form P.D. 180, "Request for Approval to Engage in Outside Employment." This required MPD employees to report sole proprietorships.

The Defendant was aware of the need to file the appropriate outside employment forms with the MPD.

3. On April 13, 2021, the Defendant opened a new bank account, ending in -8199, at Northwest Federal Credit Union ("NWFCU") in her own name. NWFCU is a financial institution insured by the Federal Deposit Insurance Corporation.

4. On May 2, 2022, the Defendant incorporated Wheels Enterprise LLC ("Wheels") in Maryland. The Defendant never reported this business to MPD as she was required to do.

5. On June 7, 2021, the Defendant incorporated a business in her own name, Kalynn Fields, in Maryland. The Defendant never reported this business to MPD as she was required to do.

The Scheme to Defraud

6. Starting in or about April 2021, and continuing until at least December 2021, the Defendant devised and intended to device a scheme to defraud the United States, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

Manner and Means

It was part of the scheme that:

7. On or about April 13, 2020, the Defendant had someone file one PPP loan application on behalf of her business, Kalynn Fields, containing materially false statements. The Defendant applied for the PPP loan despite never intending to use the loan funds for a legitimate business purpose.

8. On or about September 7, 2021, the Defendant submitted a Form 3508S, "PPP Loan Forgiveness Application," on behalf of Kalynn Fields for the $20,000.00 PPP loan from NWFCU but listed the trade name of the business as Wheels Enterprise. As part of that loan forgiveness

application, the Defendant further indicated her business was "General Freight Trucking, Long Distance." In fact, the Defendant did not have a freight trucking license or the necessary insurance to run such a business. The Defendant also affirmed that she had complied with all requirements of the PPP Program, including the eligible uses of PPP loan proceeds and the amount of PPP loan proceeds that had to be used for payroll costs. In fact, the Defendant had not complied with the PPP Program rules and misspent the PPP funds she received as part of her fraudulent PPP loan application.

9. On or about September 10, 2021, the Defendant had someone submit one EIDL application on behalf of her business, Kalynn Fields, containing materially false statements. When the Defendant's initial EIDL application was declined by the SBA because the Defendant did not meet the credit score threshold, the Defendant had someone upload supplemental documents to the SBA application portal, including a fabricated 2019 IRS Schedule C (Profit or Loss from Business). The Defendant applied for the EIDL despite never intending to use the loan funds for a legitimate business purpose.

10. On or about September 22, 2021, after authorizing someone to provide the SBA with the false and misleading supplemental documents, the SBA approved the Defendant's EIDL application.

11. On or about September 28, 2021, the SBA deposited an initial payment of $5,000 to the Defendant's NWFCU account ending in -8199. This brought the total balance in the Defendant's account to $5,005.34.

12. On September 29, 2021, the SBA deposited an additional $10,000 into the Defendant's NWFCU account ending in -8199. This brought the total balance in the Defendant's account to $15,005.34.

13. The Defendant quickly depleted the PPP loan and EIDL funds deposited into her NWFCU bank account ending in -8199 through various money transfers and payments for goods and services, in the District of Columbia and elsewhere, that seemingly have no legitimate business purpose, including using the funds to pay for purchased meals at restaurants, liquor from shops, designer shoes, and a tattoo and piercing parlor.

14. On or about the date set forth below, in the District of Columbia and elsewhere, the Defendant, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowingly and intentionally transmitted and caused to be transmitted writings, signs, signals, pictures, and sounds, by means of the following wire communications in interstate commerce:

Approximate Date	Description
September 10, 2021	Submitted Fraudulent EIDL application to the Small Business Association

(Wire Fraud, in Violation of Title 18, United States Code, Section 1343)

Respectfully submitted,

Edward R. Martin, Jr.
United States Attorney

By: /s/ *Rebecca G. Ross*

Rebecca Ross (N.Y. BAR #5590666)
Assistant United States Attorney
601 D Street N.W.
Washington, D.C. 20530
Rebecca.Ross2@usdoj.gov
(202) 815-8982