

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA) INFORMATION NO. 4:23CR-29
)
 v.) 18 U.S.C. § 4
) Misprison of Felony
 JACQUELINE SOMESSO)
) 18 U.S.C. § 1344
) Bank Fraud

FILED
John E. Triplett, Clerk of Court
United States District Court
By James Burrell at 4:16 pm, Mar 28, 2023

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
Misprison of Felony
18 U.S.C. § 4

Beginning on a date at least as early as April 2019, up to August 2022, the precise dates being unknown, in Chatham County, within the Southern District of Georgia, and elsewhere, the Defendant,

JACQUELINE SOMESSO,

had knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute Controlled Substances*, did conceal in furtherance of the drug-trafficking conspiracy and having knowledge of the illegal possession of controlled substances and firearms by her boyfriend, Dennis Kinchen, at her residence at 325 Westbrook Lane, Pooler, Georgia, and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States.

All in violation of Title 18, United States Code, Section 4.

COUNT TWO
Bank Fraud
18 U.S.C. § 1344

On or about May 14, 2021, in the Southern District of Georgia, and elsewhere,
the Defendant,

JACQUELINE SOMESSO,

did knowingly execute and attempt to execute a scheme and artifice to defraud Community Federal Savings Bank, and to obtain money, funds and property owned by and under the custody and control of Community Federal Savings Bank, by means of false and fraudulent pretenses, representations, and promises, which affected a financial institution, and schemes and artifice being in substance as follows:

THE SCHEME AND ARTIFICE

It was a part of the scheme and artifice that the defendant submitted fake bank statements to Community Federal Saving Bank, which is a federally insured financial institution with locations throughout the Southern District of Georgia.

The false documents were submitted for the purpose of obtaining a Paycheck Protection Program ("PPP") loan for Liquid Café, which according to the Georgia Corporations Division of the Georgia Secretary of State, as of July 23, 2022, list the defendant as the Registered Agent.

As a part of the scheme and artifice, the defendant made or caused to be made, fake bank statements for the purpose of falsifying her payroll expenses.

The fake statements purported to be from Colony Bank and ranged from February 2021 to April 2021. However, the statements were later determined to be fake, and were allegedly created and submitted to Community Federal Savings Bank in an application for PPP funds.

On May 14, 2021, via a wire transfer from Community Federal Savings Bank, the defendant's Colony Bank account number 231151752, held in the name of Liquid Café, LLC's, received a deposit of \$570,736.87.

All in violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATIONS

The allegations contained in Count Two of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(A).

Upon conviction of Count Two set forth in this Information, Defendant,

JACQUELINE SOMESSO,

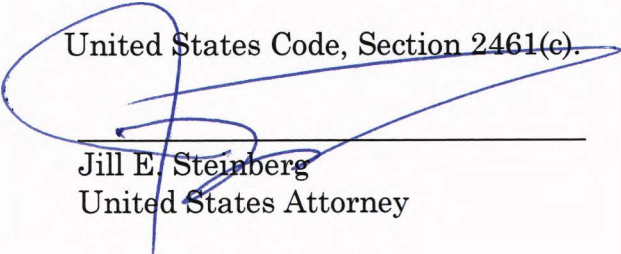
shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation, including but not limited to: a Money Judgment in the amount of \$570,736.87 in U.S. Currency.

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).



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