IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) 4:25-CR-00483 SEP
)
JOHN J. DIEHL, JR.)
)
Defendant.)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
WIRE FRAUD

A. INTRODUCTION

At all times relevant to the Information:

1. The COVID-19 pandemic had a significant effect on the nation and its economy. Stay-at-home orders, social distancing requirements, and reduced consumer demand early in the pandemic caused both temporary and permanent business closures, particularly among small businesses. To help support small businesses, in March 2020, Congress passed the CARES Act that, among other things, provided funds for two new Small Business Administration (hereinafter referred to as "SBA") pandemic relief programs: the Paycheck Protection Program (hereinafter referred to as "PPP") and the Economic Injury Disaster Loan (hereinafter referred to as "EIDL").

2. The EIDL program was a pandemic relief program managed by the SBA in which small businesses could apply for deferred, low interest loans to be used strictly for working capital, payroll, and other fixed debts of the business caused by the Pandemic in 2020. As of April 2021, the maximum permitted EIDL loan was $ 500,000.00 per borrower.

3. The Diehl Law Group, LLC (hereinafter referred to as "Diehl Law Group") was a law firm with its office located in St. Louis, Missouri.

4. The Defendant, John J. Diehl, Jr. (hereinafter referred to as "**DIEHL**") was the sole owner and operator of Diehl Law Group, which had no other employees.

B. SCHEME TO DEFRAUD

5. Beginning in or about March 2020 and continuing through in or about February 2024, both dates being approximate and inclusive, in the Eastern District of Missouri and elsewhere, defendant,

JOHN J. DIEHL, JR.,

devised, intended to devise, and knowingly participated in a scheme to defraud and for obtaining money and property from The United States of America Small Business Administration, in an approximate amount of $379,900.00, by means of materially false and fraudulent pretenses, representations, and promises.

6. It was a part of the scheme that, on or about March 30, 2020, Defendant **DIEHL**, on behalf of Diehl Law Group, submitted an online loan application to the SBA seeking an EIDL loan for pandemic-related economic assistance.

7. It was a further part of the scheme that on or about June 6, 2020, prior to receiving the EIDL loan, the Defendant **DIEHL** electronically signed a SBA "Loan Authorization and Agreement" form in which he represented and certified that Diehl Law Group "...will use all the proceeds of this Loan solely as working capital to alleviate economic injury caused by disaster occurring in the month of January 31, 2020 and continuing thereafter...."

8. It was a further part of the scheme that on or about April 16, 2020, an advance of $1,000.00 relative to the EIDL loan application was approved and, on or about April 21, 2020, was funded by the SBA, and $1,000.00 was then electronically transmitted by wire from the United

States Treasury into the Diehl Law Group, LLC, dba Outside GC Services bank account ending in 2494 at UMB Bank (hereinafter referred to as "Diehl Law Group Bank Account"). On or about April 27, 2020, Defendant **DIEHL** made a payment of $1,320.15 to a country club, which impermissibly included the recently deposited EIDL loan advance of $1,000.00.

9. It was a further part of the scheme that on or about June 6, 2020, the EIDL loan application was approved and, on or about June 9, 2020, was funded by the SBA, and $93,900.00 was then electronically transmitted by wire from the United States Treasury into the Diehl Law Group Bank Account.

10. It was a further part of the scheme that following receipt of the EIDL loan proceeds, **DIEHL** transferred some of the funds from the Diehl Law Group Bank Account to his personal bank accounts. It was a further part of the scheme that between on or about June 10, 2020 and August 16, 2021, Defendant **DIEHL** impermissibly used the EIDL loan proceeds for impermissible personal use and purposes, unrelated to working capital for Diehl Law Group. The impermissible personal use and purposes included, but were not limited to, payments on personal Tesla, Audi and Jeep automobiles, payments on personal credit cards, payments on a personal residence mortgage, payments for a family member's college tuition, payments for a pool maintenance company, payments for country club dues and fees, and cash withdrawals for personal use and expenses. Additionally, on or about September 16, 2020, Defendant **DIEHL** impermissibly transferred $50,039.55 of the EIDL loan proceeds to the Diehl Law Group Defined Benefit Plan at Fidelity Investment Company. **DIEHL** was the only participant in the Defined Benefit Plan.

11. It was a part of the scheme that, during in or about March, 2022, Defendant **DIEHL**, on behalf of Diehl Law Group, requested an EIDL loan modification from the SBA for pandemic-related economic assistance.

12. It was a further part of the scheme that on or about April 6, 2022, prior to receiving the EIDL loan modification funds, the Defendant **DIEHL** electronically signed a SBA "Amended Loan Authorization and Agreement" form in which he represented and certified that Diehl Law Group "…will use all the proceeds of this Loan solely as working capital to alleviate economic injury caused by disaster occurring in the month of January 31, 2020 and continuing thereafter…."

13. It was a further part of the scheme that on or about April 6, 2022, the EIDL loan modification application was approved and, on or about April 12, 2022, was funded by the SBA, and $285,000.00 was then electronically transmitted by wire from the United States Treasury into the Diehl Law Group Bank Account.

14. It was a further part of the scheme that following receipt of the EIDL modified loan proceeds, **DIEHL** transferred some of the funds from the Diehl Law Group Bank Account to his personal bank accounts. It was a further part of the scheme that between on or about April 14, 2022 and June 21, 2023, **DIEHL** impermissibly used the EIDL modified loan proceeds for unauthorized personal use and purposes, unrelated to working capital for Diehl Law Group. The personal use and purposes included, but were not limited to, payments on personal credit cards, payments of legal fees relative to a personal legal matter, payments for a family member's college tuition, payments on a personal residence mortgage, and cash withdrawals for personal use and expenses. Additionally, on or about September 16, 2022, **DIEHL** impermissibly transferred $150,000.00 of the EIDL modified loan proceeds to the Diehl

Law Group Defined Benefit Plan at Fidelity Investment Company, of which **DIEHL** was the sole participant.

C. THE WIRE

COUNT ONE

15. On or about April 12, 2022, within the Eastern District of Missouri and elsewhere, for the purpose of executing the above-described scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, and representations, the defendant,

JOHN J. DIEHL, JR.,

did knowingly transmit and cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, and signals, that is the Defendant caused the SBA Denver Finance Center located in Denver, Colorado to transmit payment information through the FMS system in Sterling, Virginia to the United States Treasury Department which electronically transmitted $285,000.00 in EIDL loan funds to the Diehl Law Group LLC Bank Account at UMB Bank in Missouri, which funds Defendant later used for personal use and purposes unrelated to the working capital of the Diehl Law Group.

In violation of Title 18, United States Code, Section 1343.

Respectfully submitted,

THOMAS C. ALBUS
United States Attorney

HAL GOLDSMITH, #32984MO
Assistant United States Attorney

UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Hal Goldsmith, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

HAL GOLDSMITH, #32984MO

Subscribed and sworn to before me this 18th day of August, 2025.

Nathan M. Graves
CLERK, U.S. DISTRICT COURT

By: /s/ Jason W. Dockery
DEPUTY CLERK