UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA	)	**INFORMATION NO.** 4:22cr-143
	)	
v.	)	**18 U.S.C. § 371**
	)	**Conspiracy**
SALMAT DEYJI	)	

THE UNITED STATES ATTORNEY CHARGES THAT:

<u>COUNT ONE</u>
Conspiracy
18 U.S.C. § 371

1. Beginning no later than April 2021 and continuing through at least June 2021, within the Southern District of Georgia, Northern District of Georgia, and Western District of Texas, and elsewhere, the defendant,

SALMAT DEYJI,

did knowingly and willfully combine, conspire, confederate, and agree with at least one other person to:

a. devise or intend to devise a scheme or artifice to defraud, and for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, and to transmit or cause to be transmitted by wire communication in interstate commerce any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, in violation of 18 U.S.C. § 1343, and

b. commit money laundering, that is to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is wire fraud, with the intent to promote the carrying on of wire fraud, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956, the conspiracy to commit such offenses being in violation of 18 U.S.C. § 371.

2. The object of the conspiracy was for Defendant and her coconspirators to unjustly enrich themselves by making false PPP applications to lenders, to unlawfully induce the lenders to disburse SBA-backed loans to coconspirators in amounts to which they were not entitled, and who, in turn, would pay a portion of the ill-gotten funds to Defendant as a kickback through financial transactions.

3. It was a part of the conspiracy that Defendant and coconspirators, including Jerrod Bellamy, would perform the following:

a. Defendant and coconspirators utilized cellular devices and the internet to create fraudulent PPP applications. Some coconspirators would provide Bellamy with their personal identifying information (PII) to create a false loan. Bellamy would, in turn, send the PII to Defendant, who would then use the internet to create fraudulent PPP applications. After a PPP application was approved by a lender, the conspirators would electronically receive, sign, and submit loan documents to the lender.

b. To disguise the falsity of such applications, Defendant would utilize a computer and the internet to create false IRS Schedule C forms. The

Schedule C forms were submitted as part of the application to dupe lenders. Such forms inflated revenue and fabricated the existence of businesses.

c. On other occasions, Defendant would directly obtain the PII of those seeking loans and create false and fraudulent applications on their behalf.

d. In exchange for Defendant completing a fraudulent PPP application, applicants and coconspirators agreed to pay Defendant several thousand dollars per PPP application. Once coconspirators received the PPP funds derived from the false application, they would transmit a kickback to Defendant through bank transfers to her accounts. Such transmissions were financial transactions representing the proceeds of a specified unlawful activity, namely wire fraud. In 2021, Defendant received tens of thousands of dollars in her Navy Federal Credit Union bank account from the fraudulent scheme.

4. On or about April 4, 2021, in the Southern District of Georgia and elsewhere, Defendant, aided and abetted by others, for the purpose of executing the scheme and artifice described above, and attempting to do so, caused to be transmitted in interstate commerce, by means of wire communication, certain signs, signals, and sounds: that is, on or about April 4, 2021, Defendant transmitted an electronic PPP application from the Southern District of Georgia to a lender outside the State of Georgia seeking funds, knowing that such application contained false information.

5. In reliance on false representations made in more than twenty PPP applications created by Defendant, lenders headquartered outside the State of

Georgia, by means of wire communication, deposited more than $250,000 into coconspirators' bank accounts resulting from this scheme.

6. On or about April 26, 2021, in the Southern District of Georgia and elsewhere, Bellamy conducted a financial transaction affecting interstate and foreign commerce, which involved the proceeds of wire fraud. As part of the conspiracy, Defendant received a wire transfer of $2,000 from Bellamy on that date, knowing that the money was obtained from the proceed of a fraudulently obtained PPP application, and with the intent to promote the carrying on of the wire fraud conspiracy in which they and others were engaged.

All done in violation of Title 18, United States Code, Section 371.

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