UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA	)	**INFORMATION NO.** 4:22cr-64
	)	
v.	)	**18 U.S.C. § 1343**
	)	**Wire Fraud**
JENNAI MANCE	)	

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
Wire Fraud
18 U.S.C. § 1343

1. In or about March 2021 until in or about July 2021, in Liberty County, within the Southern District of Georgia, the defendant, **JENNAI MANCE,** did knowingly devise and intend to devise a scheme and artifice to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises.

Background

2. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or about March 2020 designed to provide emergency financial assistance to the millions who are suffering the economic effects caused by the COVID-19 pandemic.

3. Among other relief efforts, the United States sought to provide financial support to eligible businesses that could be used to offset certain business expenses.

4. The Small Business Administration ("SBA") is an executive branch

agency of the United States government that provides support to entrepreneurs and small businesses. The SBA is headquartered in Washington, DC and maintains its computer servers outside of the State of Georgia. The SBA's mission is to maintain and strengthen the nation's economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters.

5. As part of this effort, the SBA enables and provides for loans through banks, credit unions, and other lenders. These loans have government-backed guarantees. In addition, the SBA provides loans that come directly from the U.S. Government.

6. One source of relief provided by the CARES Act was the authorization of up to $349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program ("PPP"). In or around April 2020, Congress authorized over $300 billion in additional PPP funding.

7. To obtain a PPP loan, a qualifying business had to submit a PPP loan application signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications to be eligible to obtain the PPP loan. In the PPP loan application, the small business (through its authorized representative) had to state, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures were

then used to calculate the amount of money the small business was eligible to receive under the PPP. In addition, a business applying for a PPP loan had to provide documentation showing its payroll expenses.

8. A PPP loan application must be processed by a participating lender, such as a financial institution. If a PPP loan is approved, the participating lender funds the PPP loan using its own monies, which are 100% guaranteed by the SBA. Data from the application, including the information about the borrower, the total amount of the loan, and the listed number of employees, is transmitted by the lender to the SBA in the course of processing the loan.

9. The PPP loan proceeds must be used by the business on certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal of the PPP loan to be entirely forgiven if the business spends the loan proceeds on these expense items within a designated period of time and uses a certain percentage of the PPP loan proceeds on payroll expenses.

The Scheme

10. Defendant's scheme was to unjustly enrich herself by obtaining PPP proceeds under false and misleading pretenses, including by making false statements in PPP applications.

11. It was part of the scheme and artifice that Defendant, then residing in the Southern District of Georgia, aided and abetted by others, caused to be submitted a PPP loan application that contained false statements about a sole proprietorship. The loan application was submitted via the internet. In particular, on or about March

1, 2021, Defendant caused to be submitted an electronic PPP loan application to "Bank 1" seeking $20,000. Such application falsely affirmed, among other information, that Defendant was the sole proprietor of a business established on Feb. 15, 2019, which had $8,000 in average monthly payroll. Defendant knew these assertions to be false. Defendant's PPP applications contained representations that Defendant well knew were false.

12. In reliance on false representations made in Defendant's PPP application, "Bank 1," headquartered in Delaware, deposited money into Defendant's bank account at "Bank 2," and Defendant thereafter accessed some of these funds in Georgia.

Execution of the Scheme

13. On or about March 1, 2021, in the Southern District of Georgia, and elsewhere, **JENNAI MANCE**, 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 a wire communication, certain signs, signals, and sounds: that is, Defendant **JENNAI MANCE** caused to be transmitted an electronic PPP application from the Southern District of Georgia to Bank 1 in Delaware, which caused Bank 1 to deposit approximately $20,000.00 into Defendant's account at Bank 2.

All in violation of Title 18, United States Code, Sections 1343 & 2.

FORFEITURE ALLEGATIONS

The allegations contained in Counts One of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Upon conviction of the Title 18 offense set forth in Count One of this Information, the Defendant **JENNAI MANCE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to the charged offense.

If any of the property described above, as a result of any act or omission 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 that cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

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