UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA	**3:25-cr-** 00323-AN
v.	**INFORMATION**
BAYLESS COBB,	**18 U.S.C. § 1349**
Defendant.	**Forfeiture Allegation**

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
(Conspiracy to Commit Wire Fraud)
(18 U.S.C. § 1349)

1. Beginning no later than February 2021 and continuing until at least March 2022, in the District of Oregon and elsewhere, defendant **BAYLESS COBB**, and others known and unknown to the United States Attorney, did agree to accomplish a common and unlawful plan to commit wire fraud. Specifically, defendant agreed with others to gather fraudulent business information for defendant or a co-conspirator to submit fraudulent Paycheck Protection Program ("PPP") applications on behalf of the named applicants.

MANNER AND MEANS

2. To carry out their material scheme to defraud, defendant gathered fraudulent business information from co-conspirators that defendant used or caused to be used to submit

PPP applications on behalf of his co-conspirators. Defendant and the co-conspirators knew the applications contained fraudulent and material business information and that many of the business entities did not exist.

3. After the PPP loans were funded, defendant's co-conspirators paid defendant a fee for submitting the fraudulent applications.

4. During the course of the conspiracy, defendant and others used, and caused to be used, interstate wire communications to submit the fraudulent applications. Specifically, the fraudulent applications were submitting using servers in Oregon and then routed to servers in Virginia via wire.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Count 1 of this Information, defendant **BAYLESS COBB** shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(l)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

If any of the above-described forfeitable property, 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 which cannot be divided without difficulty;

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It is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

Dated: August 12, 2025

Respectfully submitted,

SCOTT E. BRADFORD
United States Attorney

s/ Meredith D.M. Bateman
MEREDITH D.M. BATEMAN, OSB #192273
Assistant United States Attorney