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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,)	CASE NO. 21-CR-0362-YGR
14 Plaintiff,)	UNITED STATES' SENTENCING
15 v.)	MEMORANDUM
16 CHRISTINA BURDEN,)	Date: February 24, 2022
17 Defendant.)	Time: 2:30 p.m.
)	Court: Honorable Yvonne Gonzalez Rogers
)	

INTRODUCTION

1
2 Defendant Christina Burden took advantage of the COVID-19 pandemic to line her own pockets.
3 As described below, Defendant submitted five completed loan applications on behalf of two shell
4 companies seeking money meant for businesses struggling in the face of the pandemic. Although
5 Defendant's companies had no employees and no actual business, Defendant's loan applications
6 fraudulently affirmed that her businesses had upwards of 89 employees and monthly payroll expenses
7 north of \$700,000. To support these false assertions, Defendant submitted doctored bank records and
8 fake payroll tax forms. Ultimately, Defendant sought over \$4.6 million in pandemic loans from the
9 SBA, and actually received over \$1.1 million from the government. Rather than use that money for
10 payroll and other business expenses (as required by the CARES Act), Defendant spent hundreds of
11 thousands of dollars on airline tickets, luxury vacations, private jet travel, several luxury vehicles, and
12 items from Louis Vuitton, Nordstrom, and Neiman Marcus.

13 But the lies contained in Defendant's loan applications are not the only lies she has told. During
14 the presentence report investigation in this case, Defendant lied repeatedly to the probation officer. She
15 told the probation officer that everything she spent on herself was for her business, despite the fact that
16 she has no real business and spent most of the money on luxury items for herself. She told the probation
17 officer someone else completed her loan applications, despite the fact that an IP Address traced to
18 Defendant's Oakland apartment submitted most of the loan applications and accessed her company's
19 PPP account over 50 times. She told the probation officer that she gave "\$300K+ in donations through
20 blessing box co to various families in needs [sic] which are itemized." But Defendant's bank records
21 show no such donations and Defendant has provided nothing "itemized" to support this claim. Earlier in
22 the case, she told probation that she worked for Salesforce and apparently provided a Salesforce pay
23 statement, only to later tell probation that she never actually worked at Salesforce (showing the pay stub
24 she provided to be fraudulent).

25 Simply put, Defendant is a serial liar. She even lied on her resume to get the six-figure-salary
26 job she had up until being charged in this case, telling Verily Life Sciences that she had an MBA from
27 Stanford and a B.S. from Spelman college, despite the fact that she never attended either institution and
28 does not have a college degree. Accordingly, for the reasons set forth below, the government

1 respectfully requests that the Court sentence Defendant to 33 months imprisonment, a three-year term of
2 supervised release (with the conditions recommended by probation and set forth in the plea agreement),
3 \$1,143,191 in restitution, a \$400 special assessment, and order forfeiture of the items set forth in the
4 plea agreement.

5 **BACKGROUND**

6 **I. Offense Conduct**

7 **A. Background on Federal Loan Programs**

8 The CARES (Coronavirus Aid, Relief, and Economic Security) Act is a federal law enacted in
9 March 2020 and designed to provide emergency financial assistance to the millions of Americans who
10 were suffering the economic effects caused by the COVID-19 pandemic. *See* Presentence Investigation
11 Report (“PSR”) ¶¶ 6-10. One source of relief provided by the CARES Act was the authorization of up
12 to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses,
13 through a program referred to as the PPP.

14 PPP loans are administered by the Small Business Administration (SBA) through approved
15 lenders and are designed to assist small business owners with expenses such as payroll costs, rent, and
16 utilities so that businesses can maintain their workforce during the COVID-19 crisis. The loan amount
17 is determined by the monthly payroll of the small business. The loan money comes directly from the
18 approved lenders to the applicant and is guaranteed by the SBA. To qualify for a PPP loan, the
19 applicant’s business must have been in operation on February 15, 2020, have employees, have average
20 monthly payroll costs, and provide documentation to support these assertions. The PPP loan application
21 requires the borrower to certify that the funds will be used to retain workers and maintain payroll; or
22 make payments for mortgage interest, rent, utilities, covered operations expenditures, covered property
23 damage costs, covered supplier costs, and covered worker protection expenditures as specified under the
24 Paycheck Protection Program Rules. In addition, the PPP loan application requires applicants to state
25 any other businesses they own, and specify whether they have applied for any other PPP loans.

26 In addition to PPP loans, struggling business were allowed to apply for the SBA’s Economic
27 Injury Disaster Loan (EIDL) Program during the COVID-19 pandemic. *Id.* ¶¶ 11-15. EIDL Advances
28 are administered and funded by the SBA. EIDL Advances are designed to give emergency assistance to

1 small business that are experiencing a temporary loss of revenue due to the COVID-19 pandemic. To
 2 obtain an EIDL and advance, a qualifying business must submit an application to the SBA and provide
 3 information about its operations, such as the number of employees, gross revenues for the 12-month
 4 period preceding the disaster, and cost of goods sold in the 12-month period preceding the disaster. In
 5 the case of EIDLs for COVID-19 relief, the 12-month period was that preceding January 31, 2020.

6 **B. Defendant's Fraudulent Loan Applications**

7 Defendant submitted four completed PPP loan applications and one EIDL loan application for
 8 multiple business entities, as indicated by the table below.¹

	Approximate Date of Application	Company Name	Program	Application submitted to	Status	Amount Sought
13	1 04/07/2020	Burden Consulting Group LLC	EIDL	SBA	Funded	\$150,900.00
14	2 05/16/2020	Burden Consulting Group LLC	PPP	Blue Vine	Funded	\$307,916.00
15	3 06/11/2020	Blessing Box Co. LLC	PPP	Divvy Pay	Denied	\$1,854,166.67
16	4 06/18/2020	Blessing Box Co. LLC	PPP	First Home Bank	Denied	\$1,700,000.00
17	5 06/20/2020	Blessing Box Co. LLC	PPP	Kabbage	Funded	\$684,375.00
				TOTAL		\$4,696,637.67

18
 19 *Id.* ¶ 20. Each of these loan applications was fraudulent and contained myriad materially false
 20 statements. Specifically, each of the loan applications contained the following:

- 22 • False statements regarding ownership of other businesses. Despite owning multiple purported businesses (both Burden Consulting Group and Blessing Box), Defendant checked the box on each application indicating that she did not own any other businesses.
- 24 • False statements regarding the dates of operation of the subject entities. Defendant affirmed that each business was in operation before February 15, 2020 despite the fact that one of the entities was registered after that date and there is no evidence that any of the entities had any operations as of that

27 ¹ Defendant also began the submission process for six additional PPP loan applications on behalf
 28 of Blessing Box and two other shell companies called Pinkies Place, LLC and Creative Synergy Group, LLC. Three of these applications were rejected for being incomplete and three were cancelled before submission.

1 date or any date.

- 2 • False statements regarding the number of employees and monthly payroll expenses. Defendant
3 affirmed that her businesses had upwards of 89 employees and monthly payroll expenses north of
4 \$700,000. A review of Defendant's entities' tax records reveal, however, that none of them has ever
5 paid any payroll taxes or submitted payroll tax forms. In fact, it appears the entities do not have any
6 employees and do not do any legitimate business. And a review of Defendant's bank records make
7 clear that the money received was not used for payroll.
- 8 • Doctored bank records. Each of Defendant's applications contained bank records supposedly
9 supporting the entities' claims regarding payroll expenses. A review of the actual bank records,
10 however, demonstrate that the bank records submitted in support of the loans were fraudulent.
- 11 • Fraudulent tax forms. Each of Defendant's applications contained tax forms (Form 940 or Form 941)
12 supposedly showing payroll taxes supporting the number of employees and payroll she claimed. A
13 review of the various entities' actual tax records, however, show that none of them ever filed such
14 payroll forms with the IRS.

15 *Id.* ¶¶ 16-19. In total, Defendant submitted five completed loan applications seeking a total of
16 \$4,696,637.67. She received a total of \$1,143,191 from those applications. Rather than use that money
17 for payroll and other business expenses, Defendant's bank records reveal that she spent the money on
18 airline tickets, private jet travel, several luxury vehicles, and items from Louis Vuitton, Nordstrom, and
19 Neiman Marcus, specifically as follows:

- 20 • \$184,000 on airfare, private jet travel, and hotel expenses
- 21 • \$124,000 on luxury purchases from Louis Vuitton, Neiman Marcus, and Nordstrom
- 22 • \$16,000 on boat and car rentals
- 23 • \$14,000 on restaurant and entertainment

24 In addition to the expenditures noted above, Defendant wired over \$460,000 to individuals who were not
25 employees of the businesses nor did they have any connection to the businesses. Approximately
26 \$400,000 of this money went to Defendant's mother and her former fiancé, Aisha Chiappetta. At least
27 \$150,000 of those wired funds were spent on automobiles from Mercedes, Land Rover, and Nissan. *Id.*

28 ¶¶ 21-24.

29 C. Defendant's Additional False Statements

30 As set forth in the PSR, Defendant provided the probation officer with several false or
31 misleading written answers in response to the Presentence Interview Form. First, Defendant stated the
32 following as to her fraudulent PPP loan applications:

1 I hired a representative through an online black market to complete my
2 PPP loan applications. I was unaware the representative and the online site
3 was considered black market because it was a public site and because I
was provided the contact information by several acquaintances I met
through the Harris Twins Ministries.

4 *Id.* ¶ 29. The government has found no evidence to support this statement regarding a black-market
5 representative who completed Defendant’s PPP loan applications. Rather, the government’s
6 investigation revealed that an IP Address linked with Defendant’s Oakland apartment accessed Burden
7 Consulting Group’s loan application page over 60 times between May 17, 2020 and May 27, 2020 and
8 that most of Defendant’s loan applications were submitted from that IP Address. *See* Case No. 21-mj-
9 70195-VKD (Search Warrant Affidavit, at ¶¶ 43, 49). The investigation also revealed that the same IP
10 Address accessed Blessing Box’s loan application page over 50 times between June 19, 2020 and July 6,
11 2020. *Id.* at ¶ 61. These facts support the inference that it was Defendant, not some black-market
12 representative, who completed the fraudulent loan applications.

13 Next, Defendant told probation as follows regarding the loan proceeds that she kept for herself:
14 “Everything spent on my self was for my business (TradeMark Rights, Inc File – thirdparty provider to
15 be a registered agent and keep my business in compliance, car payments, insurance).” PSR at ¶ 29.
16 This is demonstrably false. As set forth in the PSR, Defendant spent hundreds of thousands of dollars
17 on airline tickets, private jet travel, several luxury vehicles, and items from Louis Vuitton, Nordstrom,
18 and Neiman Marcus. In no way were these expenses “for her business” (which business didn’t actually
19 have any employees).

20 In the same response, Defendant stated as follows regarding supposed donations she made: “I
21 gave over \$300K+ in donations through blessing box co to various families in needs [sic] which are
22 itemized.” *Id.* Defendant’s and Blessing Box’s bank records, however, show no such donations and
23 Defendant has provided nothing “itemized” to support this claim.

24 Furthermore, the PSR stated as follows regarding Defendant’s reporting of her supposed
25 employment at Salesforce, and her submission of a seemingly fraudulent pay statement to probation:

26 However, during the course of the investigation, the undersigned learned
27 that the defendant had reported to her U.S. Pretrial Services Officer that
she worked for Salesforce and provided a pay statement in support of that
28 employment. When asked by the undersigned if she ever worked for
Salesforce, she reported that she had a job offer but did not accept it. This
left the undersigned questioning what would motivate the defendant to

1 provide conflicting, perhaps even fraudulent, information.

2 PSR at Sentencing Recommendation.

3 Apart from the statements made during the PSR process, the government's investigation has
4 revealed that Defendant lied about her educational background to obtain her most recent job. The PSR
5 sets forth that Defendant worked at Verily Life Sciences (a Google-owned company) from 2019 to 2021.
6 *Id.* at ¶ 84. While there, she earned \$170,000 per year as well as \$100,000 in stock options. *Id.* Verily
7 Life Sciences has confirmed Defendant's employment. Verily Life Sciences, however, also provided
8 the resume and employment application Defendant submitted to Verily. *See* Fine Decl. Exs. A and B.
9 In those documents, Defendant claimed that she earned a B.S. from Spelman College in 2009 and an
10 M.B.A. from Stanford University in 2012. In reality, Defendant never attended either institution and has
11 only completed approximately six months of college. *See* PSR at ¶ 78.

12 **II. Procedural Posture**

13 On February 3, 2021, the government charged Defendant, by complaint, with one count of bank
14 fraud, in violation of 18 U.S.C. § 1344. ECF No. 1. Defendant was released pending trial on release
15 conditions set by a magistrate judge in the Western District of Texas. On September 14, 2021, the
16 government filed an Information charging Defendant with two counts of bank fraud, in violation of 18
17 U.S.C. § 1344 and two counts of money laundering, in violation of 18 U.S.C. § 1957. ECF No. 15. On
18 February 24, 2022, Defendant will plead guilty to those four counts and be sentenced. ECF No. 20. Per
19 the plea agreement, the parties agreed that the applicable Offense Level under the Sentencing Guidelines
20 is 24, and the government agreed to recommend a sentence of 33 months in custody, as well supervised
21 released, forfeiture, restitution, and a special assessment. *See* Parties' Proposed Plea Agreement.

22 **ARGUMENT**

23 **I. Legal Standard**

24 The United States Sentencing Guidelines serve as "the starting point and initial benchmark" of
25 any sentencing process and are to be kept in mind throughout the process. *See United States v. Carty*,
26 520 F.3d 984, 991 (9th Cir. 2008); *see also United States v. Kimbrough*, 522 U.S. 85, 108 (2007). The
27 overarching goal of sentencing, as set forth by Congress, is for the Court is to "impose a sentence
28

1 sufficient, but not greater than necessary.” *Carty*, 520 F.3d at 991. In accomplishing that goal, the
 2 Court should consider the factors set forth under 18 U.S.C. § 3553(a), to include:

- 3 (1) the nature and circumstances of the offense and the history and
 4 characteristics of the defendant;
- 5 (2) the need for the sentence imposed to reflect the seriousness of the
 6 offense, to promote respect for the law, and to provide just
 7 punishment for the offense;
- 8 (3) the need for the sentence imposed to afford adequate deterrence to
 9 criminal conduct;
- 10 (4) the need to avoid unwarranted sentence disparities among
 11 defendants with similar records who have been found guilty of
 12 similar conduct.

10 **II. Sentencing Guidelines Calculation**

11 As set forth in the PSR and the plea agreement, the Sentencing Guidelines calculations for
 12 Defendant’s offense level is as follows:

	U.S.S.G. Section	Level/Points
Base offense level	§2B1.1(a)(1)	7
Specific offense characteristics	§2B1.1(b)(1)(J) - Intended loss amount between \$3,500,000 and \$9,500,000	+18
	§2B1.1(b)(17)(a) - The defendant derived more than \$1,000,000 in gross receipts from one or more financial institutions as a result of the offense	+2
Adjusted offense level		27
Acceptance of responsibility	§3E1.1	-3
Total offense level		24
Criminal History Category		I
RANGE		51-63 months

24
 25 PSR ¶¶ 16-26.

26 The Probation Officer concluded that Defendant’s criminal history score is 0, and she therefore
 27 falls into Criminal History Category I. *Id.*, ¶¶ 50-51. As reflected in the PSR, the Guidelines range for
 28 imprisonment associated with adjusted offense level 24 and Criminal History Category I is 51 to 63

1 months. *Id.* ¶ 88. The Probation Officer recommends a 30-month sentence. *Id.* at Sentencing
2 Recommendation.

3 **III. The United States' Sentencing Recommendation**

4 Based on a consideration of the Guidelines and the factors in Section 3553(a), the United States
5 submits that a sentence of 33 months' imprisonment, coupled with a three-year term of supervised
6 release, a restitution order, and a forfeiture order are sufficient, but not greater than necessary, to comply
7 with the factors set out above.

8 Primarily, the government notes that Defendant's charged conduct was extremely serious. The
9 PPP and EIDL fraud was undertaken during a time of great national hardship. Many legitimate
10 businesses were in need of the type of PPP and EIDL loan funds that Defendant obtained; the defendant
11 took advantage of a program that was meant to make those funds flow easily to needy legitimate
12 recipients – and not to her. As described above, funding for the PPP program was capped, so any money
13 Defendant obtained from the program did not go to other struggling businesses that needed it. And what
14 Defendant did with that money was equally egregious. Rather than use that money for payroll and other
15 business expenses, as required by the CARES Act, Defendant used the money to fund her luxurious
16 lifestyle, galavanting around the world on private jets, staying at the finest hotels, purchasing the most
17 expensive vehicles, and spending eye-popping amounts of money on fashion accessories.

18 Moreover, both specific and general deterrence are important principles to consider here. As to
19 general deterrence, and as noted above, the government funds at issue in the PPP-loan fraud aspect of
20 this case flowed freely – as they should have – during a time of national hardship. Other individuals
21 who are in Defendant's position now and in the future must know that, on top of a federal felony
22 conviction, defrauding programs like the PPP will result in prison time and monetary penalties. As to
23 specific deterrence, Defendant's pattern and variety of criminal activity, as well as her false and
24 misleading statements during the presentence investigation, indicate that there is a danger that she might
25 re-offend. A prison sentence of 33 months here will send a strong message to her that criminal conduct
26 in the future will result in even lengthier imprisonment.

27 Given the seriousness of Defendant's conduct, the Court may wonder why the government is
28 recommending a below-Guidelines sentence in this case. The answer is threefold. First, Defendant

1 accepted responsibility, waived indictment, and agreed to plead guilty shortly after her arrest. She could
2 have taken the case up to the eve of trial and likely still received some acceptance of responsibility
3 points under the Guidelines. But she didn't, and she should get some credit for that.

4 Second, the Guideline range in this case is based on an attempted loss amount of approximately
5 \$4.6 million. Defendant, however, only received approximately \$1.1 million from her fraud. There is
6 no dispute that the attempted loss amount is the correct figure to use when calculating the Guideline
7 range. But the consequences of Defendant's conduct would have been far worse had Defendant actually
8 received the \$4.6 million she sought. Had the Guideline range been based on the actual loss amount,
9 Defendant's Guidelines range would have been 33-41 months. Although the parties agree that 51-63
10 months is the correct Guidelines range here, the difference between the actual and attempted loss
11 amount factored into the government's sentencing recommendation.

12 Third, one of the § 3553(a) factors is the need to avoid unwarranted sentence disparities among
13 defendants with similar records who have been found guilty of similar conduct. As the Court might
14 expect, Defendant was not the only person to commit PPP fraud, and many others around the country
15 who committed similar crimes have already been sentenced. A representative sample of some of those
16 sentences are as follows:²

- 17 • *United States v. Price*, No. 20-cr-0522-VDG (S.D. Texas) (Defendant received a 110 month
18 sentence for PPP fraud scheme in which he sought \$2.6 million in fraudulent loans and actually
19 received \$1.6 million).
- 20 • *United States v. Bellamy*, No. 21-cr-60064-RKA (S.D. Florida) (Defendant received a 37 month
21 sentence for PPP fraud scheme in which he obtained \$1.2 million in fraudulent PPP loans)
- 22 • *United States v. Devlin*, No. 21-cr-0226-MMC (N.D. Cal.) (Defendant received an 18 month
23 sentence for PPP and other fraud schemes in which she obtained \$565,000 in illegal proceeds)
- 24 • *United States v. Jackson*, No. 20-cr-00112-MJN (S.D. Ohio) (Defendant received a 24 month
25 sentence for PPP fraud scheme in which he obtained \$2.5 million in fraudulent PPP loans)
- 26 • *United States v. Tubbs*, 20-cr-00193-BSM (E.D. Ark.) (Defendant received a 41 month sentence
27 for PPP fraud scheme in which he obtained \$2 million in fraudulent PPP loans)

28 ² Several websites have been tracking CARES Act Fraud cases and sentences, such as
<https://www.whitecollaradvice.com/ppp-fraud-sentencing-outcomes/>; and
<https://www.arnoldporter.com/en/general/cares-act-fraud-tracker/>.

- 1 • *United States v. Oskar*, 21-cr-0144-CRB (N.D. Cal.) (Defendant received a 12 month + 1 day sentence for PPP fraud scheme in which he obtained \$480,000 in fraudulent PPP loans)
- 2 • *United States v. Amiryan*, 20-cr-0520-DMG (C.D. Cal.) (Defendant received a 41 month sentence for PPP fraud scheme in which he obtained \$650,000 in fraudulent PPP loans)
- 3 • *United States v. Llerenas*, No. 21-cr-0187-JWH (C.D. Cal.) (Defendant received a 63 month sentence for PPP fraud scheme in which she obtained \$4.3 million in fraudulent PPP loans)

4
5
6 Given the pandemic fraud sentences that have been ordered throughout the country, the government
7 submits that a 33 month sentence is appropriate in this case.

8 **CONCLUSION**

9 For the foregoing reasons, the government recommends that the Court sentence Defendant to 33
10 months in prison, a three-year term of supervised release, \$1,143,191 in restitution, and a \$400 special
11 assessment. The Court should also order Defendant to forfeit her interest in the items set forth in
12 paragraph 11 of the parties’ proposed plea agreement.

13
14 DATED: February 17, 2022

Respectfully submitted,

15 STEPHANIE M. HINDS
16 United States Attorney

17 */s/ Abraham Fine*
18 ABRAHAM FINE
19 Assistant United States Attorney

1 STEPHANIE M. HINDS (CABN 154284)
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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,)	NO. CR 21-0362-YGR
)	
14 Plaintiff,)	DECLARATION OF AUSA ABRAHAM FINE IN
)	SUPPORT OF UNITED STATES' SENTENCING
15 v.)	MEMORANDUM
)	
16 CHRISTINA BURDEN,)	
)	
17 Defendant.)	

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1 I, Abraham Fine, declare and state as follows:

2 1. I am currently employed as an Assistant United States Attorney in the Northern District
3 of California.

4 2. I am counsel for the government in the above-captioned case.

5 3. Attached hereto as **Exhibit A** is a true and correct copy of Christina Burden's resume that
6 the government received from her former employer, Verily Life Sciences.

7 4. Attached hereto as **Exhibit B** is a true and correct copy of Christina Burden's
8 employment application that the government received from her former employer, Verily Life Sciences.

9
10 I declare under penalty of perjury that the foregoing is true and correct to the best of my
11 knowledge.

12
13 Executed this 17th day of February, 2022, in Berkeley, California.

14
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17 */s/ Abraham Fine*
18 ABRAHAM FINE
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EXHIBIT A

CHRISTINA BURDEN

Oakland, CA 94606 | @gmail.com

SUMMARY

Results driven operational leader with over 7 years of experience in identifying policy and procedure, reporting metrics, process initiatives, diversity initiatives and strategies, compliance requirements, recruiting and hiring practices, personnel development, retention approaches, managerial support, legal compliance issues, general HR strategies and strategic planning.

Dynamic linguistic technical recruiter with the proven ability to motivate personnel to reach desired individual and regional specific company objectives and dedicated to maximizing profits, providing impeccable customer service, and creating an atmosphere of exceptional employee morale.

Self-motivated, dynamic management professional with diverse credentials that combine solid, tactical leadership and human resources expertise with a strong business background.

CORE COMPETENCIES

- | | | |
|-----------------------------|-------------------------|-----------------------|
| HR Department Setup | Performance Management | Diversity Initiatives |
| Staff Recruitment/Retention | Training & Development | Talent Acquisition |
| Orientation and Onboarding | Project Management | Conflict Management |
| Compliance | Policies and Procedures | Employee Relations |

EDUCATION

- Master of Business Administration; Human Resources** 2012
Stanford University
- B.S. Business Administration/Computer Science** 2009
Spelman College

PROFESSIONAL EXPERIENCE

Facebook Menlo Park, CA
 Recruiter- Leadership Team June 2017 – Present

- Full Life Cycle Leadership recruiter for Artificial Intelligence, Product Leadership, UX Research, and Robotics
 - Negotiated complex offers for Director, VP, and Senior VP candidates to close candidates to exceed biannual goals.
 - Developed a holistic customized recruiting approach for Leadership Candidates (Directors and Senior VPS)
 - Partnered with hiring teams to build effective sourcing, assessment, and closing approaches.
 - Managed and prioritized multiple complex search's, projects, and worked across two teams
 - Created, measure, and scaled the workflow between candidates, hiring managers, and the recruiting team for leadership hires
 - Built a diverse pipeline of candidates through pro-active research, networking, recruiting events and on-going relationship management
- Diversity Recruiting lead for Leadership Recruiting Team.

Indeed Hire Austin, Texas
 Lead Technical Recruiter May 2016 – June 2017

- Develop and drive repeatable recruiting strategies for assigned business units and positions (entry to VP level) that include but are not limited to: contract and full time and long-term talent need.
- Responsible for all vendor management, tracking data, and reporting financial budgets to all managers and directors.
- Provide evaluations and negotiations for multi-year supply agreements with global suppliers.
- Evangelize the passive candidate for Indeed hire and Indeed.com through the onsite stage where they become actively interested in pursuing a career with the Indeed.
- Manage full life-cycle recruitment and talent acquisition process for senior level positions including sourcing, phone screens, candidate assessments, candidate tracking and status updates, interview feedback sessions, compensation analysis, offer extension, negotiations and candidate relationships.
- Develop and cultivate strong relationships with management and business leaders at all levels of the organization to assess the business needs and objectives to develop candidate profiles that match overall requirements and success factors for short and long-term talent needs of the business.
- Coach and train hiring managers, interviewers and recruiting colleagues on the recruitment process, interviewing skills, assessment techniques, and recruiting systems.

Microsoft**Senior Technical Recruiter**

Redmond, WA

Aug 2011 – May 2016

- Recruited for software engineers, sr. programmer analysts, developers, supervisors, systems architects, program manager, project coordinators, project managers and other technical IT positions for Microsoft.
- Partnered with business leaders and HR partners to define the talent acquisition strategy for Services globally as a critical component of our overall People Agenda.
- Effectively developed Boolean Search Strings and immediately identify points of clarification or needed research to optimize performance and client service delivery, based on stated requirements on requisitions.
- Led the talent selection activity and agenda for assigned client groups maximizing quality of hire as defined by business and organization plan.
- Anticipated the future talent needs and directed talent sourcing and intelligence actions while executing business strategy.
- Led an in-direct recruitment team supporting services, demonstrating excellent mentoring skills and leadership behaviors.
- Worked extensively with internal and external candidates including internal contractor conversions.
- Recruited for the positions requiring technical skills including web/internet, middleware, and mainframe/ Legacy applications, IVR, HL7, XML, Java, C/C++, C#, J2EE and other hard to fill jobs, eProcurement, web services (design, security), PeopleSoft HR and financial, internet, security, environment, tools, build applications and business engagement.

University Recruiter

May 2009 - Aug 2011

- Collaborated and shaped the future of the engineering department at Microsoft by identifying, attracting and hiring the very best technical candidates available from Universities and Graduate schools.
- Partnered with university talent scouts to help them build diversity plans for each of their schools.
- Managed the applicant flow and selection process of diversity college programs in partnership with university talent scouts.
- Cultivated and managed further relationships with external diversity partners throughout the company.
- Responsible for all global offices university recruitment pipelines.
- Collaborated with the recruiting team on drive staffing solutions that meet the needs of the business.
- Designed and execute customized, candidate recruiting plans, partnering closely with source's, coordinators and hiring managers to achieve the best results possible.
- Responsible for university recruitment fairs, and outreach activities.
- Practiced creative sourcing techniques including referral generation, ad placement, position postings, direct sourcing and networking to develop a unique and qualified pool of candidates.
- Regularly managed pipeline activity and maintained data integrity, and proactively shared data-centric updates with internal stakeholders.

EXHIBIT B



Employment Application

Verily is an equal opportunity employer. Qualified applicants are considered without regard to race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation or any other characteristics protected by applicable law. Please do not substitute a resume in lieu of completing this application.

Today's Date 10/08/2019

Your Contact Information

First Name Christina Middle Name _____ Last Name Burden

Street Address [REDACTED] City, State Country Austin, TX, US Zip Code 78723

E-mail Address [REDACTED] Telephone (Preferred) [REDACTED] Telephone (Alternate) _____

Type of Position Desired: _____ Preferred Work Location _____

If hired, will you be 18 years of age or older upon your joining? yes

Are you legally eligible to work in the US? yes

Do you currently need, or will you someday require, Verily to sponsor work authorization for you to be hired in the US? no

Educational Background

Please fill in information where applicable.

Name of School Spelman College Country United States Graduated yes

Major Subject Computer Science/Neuroscience Degree B.S.

Name of School Stanford University Country United States Graduated yes

Major Subject HR Degree MBA

Name of School _____ Country _____ Graduate _____

Major Subject _____ Degree _____

Professional References

**Note: We will not contact the listed references until after your onsite interview (with your permission).*

Name/Title/ Business Relationship [REDACTED] Retired Facebook Executive former partnership Permission to contact? yes

E-mail Address: [REDACTED] Phone: [REDACTED]

Name/Title/ Business Relationship: **Facebook Diversity Leader** Permission to contact? **yes**

E-mail Address: [REDACTED] Phone: [REDACTED]

Name/Title/ Business Relationship: **first manager at facebook** Permission to contact? **yes**

E-mail Address: [REDACTED] Phone: [REDACTED]

Employment Background

Please fill in information where applicable.

Name of Employer	Location (City, State/Country)	Telephone	Employment Start/End Date
Facebook	Menlo Park, CA	n/a	06/2017-present

Job Title	Reason for Leaving
Recruiter	still employed

Supervisor's Name and Title: [REDACTED]

Name of Employer	Location (City, State/Country)	Telephone	Employment Start/End Date
Indeed Hire	Austin, TX, US	[REDACTED]	05/2016-06/2017

Job Title	Reason for Leaving
Recruiter Technical	Acquired by FB

Supervisor's Name and Title: [REDACTED]

Authorization: Please read carefully and check the box below

I understand that Verily requires certain information about me to evaluate my qualifications for employment and to conduct its business if I become an employee. I authorize Verily to research my past employment, educational credentials, and other employment related activities. I hereby release Verily, its partners, employees, representatives, and agents and those parties supplying such information to Verily from all liability in connection with obtaining or releasing such information.

If I am hired by Verily, I understand that Verily is an at-will employer. Accordingly, either Verily or I may terminate the employment relationship, at will, at any time, for any reason, with or without cause or advance notice. I understand that the CEO or the President of Verily has the sole authority to make an agreement contrary to at-will employment, and such an agreement must be in writing and signed by the CEO or President.

I understand that if I am hired I will be required to submit proof of my legal right to work in the U.S. prior to commencing employment with Verily.

I understand that any misrepresentations, false statements or omissions of facts made by me in connection with this application will be sufficient grounds for cancellation of consideration of my application or immediate discharge if I am employed. I have read the above prior to signing this application.

I understand that this application is not a contract of employment, and that completion of this application does not in any way obligate Verily to hire me or offer me a job.

I have read and understood the above disclosure. CB

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