

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION

UNITED STATES OF AMERICA ) INDICTMENT NO. **CR 120 107**  
 )  
v. ) 18 U.S.C. § 1343  
 ) Wire Fraud  
ROSE MARY COLEMAN )

FILED  
U.S. DISTRICT COURT  
SAVANNAH DIV.  
2020 NOV -5 AM 9:44  
CLERK  
SO. DIST. OF GA.

**THE GRAND JURY CHARGES THAT:**

At times relevant to this Indictment:

**INTRODUCTION**

1. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act is 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.

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

3. **ROSE MARY COLEMAN** and her unknown co-conspirators fraudulently sought thousands of dollars in relief payments by making false and fraudulent representations to the Small Business Administration (“SBA”).

**The Defendant and Her “Business”**

4. **COLEMAN** is an individual residing in the Southern District of Georgia, Augusta Division.

5. COLEMAN claims ownership of a business that she calls “ROSE MARY COLEMAN” and/or “Beautiful Salon, LLC.” COLEMAN’s “business” is not registered with the State of Georgia.

**The Coronavirus Aid, Relief and Economic Security Act**

6. The SBA is an executive branch agency of the United States government that provides support to entrepreneurs and small businesses. 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.

7. 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.

8. One source of relief provided by the CARES Act was the authorization for the SBA to provide Economic Injury Disaster Loans (“EIDL”) to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic.

9. In addition, the CARES Act authorized the SBA to issue advances of up to \$10,000 to small businesses within three days of applying for an EIDL (“EIDL Advance”). The amount of the EIDL Advance was determined the number of employees the applicant certified having.

10. In order to obtain an EIDL and/or EIDL Advance, a qualifying business had to submit an online application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the twelve-month period preceding the disaster, and the cost of goods sold in the twelve-month period preceding the disaster. In the case of EIDLs and EIDL Advances for COVID-19 relief, the twelve-month period was that preceding January 31, 2020. The applicant also had to certify all the information the in application is true and correct to the best of the applicant's knowledge.

11. EIDL applications were submitted directly to the SBA online at <https://covid19relief.sba.gov/#/> and processed by the agency with support from a government contractor, Rapid Finance. The amount of the loan was determined based, in part, on the information provided by the application about employment, revenue, and cost of goods, as described above. Any funds issued under an EIDL or EIDL Advance were issued directly by the SBA.

12. EIDL funds could be used for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments.

**COUNTS ONE AND TWO**

*Wire Fraud*

18 U.S.C. §§ 1343 and 2

13. The Grand Jury re-alleges and incorporates by reference the allegations in paragraphs 1 through 12.

14. From in or around June 2020, and continuing until in or around September 2020, in the Southern District of Georgia, the defendant,

**ROSE MARY COLEMAN,**

aided and abetted by others, known and unknown, 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.

**Manner and Means**

15. It was part of the scheme that the Defendant COLEMAN, aided and abetted by others, known and unknown, unjustly enriched herself and others by obtaining EIDL proceeds under false and misleading pretenses including by making false statements about the number of individuals her company employed and her company's gross revenue.

16. It was further part of the scheme that the Defendant, aided and abetted by others, known and unknown, submitted, or caused to be submitted, two SBA loan applications at <https://covid19relief.sba.gov/#/> for the following businesses:

- a. On or about June 25, 2020, COLEMAN submitted, or caused to be submitted, an electronic application for an EIDL from the SBA ("EIDL Application -0468") for a business called "ROSE MARY COLEMAN." In

connection with EIDL Application 0468, COLEMAN falsely affirmed, among other information, that her business had 10 employees and that in the twelve months prior to the disaster the business had \$23,500 in gross revenue. COLEMAN listed her home address in Augusta, Georgia as the business's address.

- b. On or about June 28, 2020, COLEMAN submitted, or caused to be submitted, an electronic application for an EIDL from the SBA ("EIDL Application -8696") for a business called "ROSE MARY COLEMAN." In connection with EIDL Application 8696, COLEMAN falsely affirmed, among other information, that her business had 10 employees and that in the twelve months prior to the disaster the business had \$23,500 in gross revenue. COLEMAN listed her home address in Augusta, Georgia as the business's address.

17. On or about July 30, 2020, in reliance on COLEMAN's false representations in "EIDL Application -8696" on behalf of her business, "ROSE MARY COLEMAN," the SBA deposited money into a bank account in COLEMAN's name at "Bank 1."

#### The Wirings

18. On or about each of the dates set forth below, in the Southern District of Georgia, the Defendant,

**ROSE MARY COLEMAN,**

aided and abetted by others, known and unknown, for the purpose of executing the scheme and artifice described above, and attempting to do so, caused to be transmitted by means of wire communication from the Southern District of Georgia to a location outside the state of Georgia the signals and sounds described below for each count, each transmission constituting a separate count:

<b><u>COUNT</u></b>	<b><u>DATE OF WIRE</u></b>	<b><u>DESCRIPTION</u></b>
1	June 25, 2020	Online submission of EIDL Application *****0468 on behalf of ROSE MARY COLEMAN
2	June 28, 2020	Online submission of EIDL Application *****8696 on behalf of ROSE MARY COLEMAN

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

**FORFEITURE ALLEGATION**

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(B), and Title 28, United States Code, Section 2461(c).

Upon conviction of one or more of the offenses alleged in counts One and Two of this Indictment, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, Defendant,

**ROSE MARY COLEMAN,**

shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation.

Additionally, upon conviction of one or more of the offenses alleged in counts One and Two of this Indictment, pursuant to Title 18, United States Code, Section 982(a)(2)(B), Defendant,

**ROSE MARY COLEMAN,**

shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation.

If any of the property described above, as a result of any act or commission 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A True Bill.



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