

1541

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 JAIME JONES )

Criminal No. 21-417  
[UNDER SEAL]  
(18 U.S.C. § 1343)

FILED

SEP 28 2021

INDICTMENT

COUNTS ONE – TWELVE

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

The grand jury charges:

INTRODUCTION

1. At all times material to this Indictment, the United States government has been taking steps to slow the spread of the novel coronavirus (COVID-19) and to mitigate its impact on the public’s health and economic well-being.

2. On or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was signed into law. The CARES Act allowed the Small Business Administration (SBA) to offer Economic Injury Disaster Loan (“EIDL”) funding to eligible small businesses that had been negatively affected by the COVID-19 pandemic. EIDL funding included EIDL loans and EIDL advances.

3. As part of the EIDL program, eligible small businesses could apply for and receive a loan from the SBA. The amount of the loan was based on a number of factors, including loss in revenue, payroll costs, and other business-related information. The SBA also considered an applicant’s credit history in determining whether to approve an EIDL loan.

4. Applicants for EIDL loans were also permitted to apply for and receive funds from the SBA as an EIDL advance. The EIDL advance did not need to be repaid to the

SBA, even if the applicant's application for an EIDL loan was ultimately denied. The amount of the advance was calculated at \$1,000 for each employee of the small business, up to a maximum amount of \$10,000. To receive the maximum EIDL advance, therefore, an applicant business needed to have at least ten employees.

5. EIDL funding was required to be used by recipient businesses to meet those necessary financial obligations that could not be met as a direct result of the COVID-19 pandemic, including payroll costs, salaries, sick leave, rent or mortgage payments, material costs, and pre-existing debts.

6. In order to obtain EIDL funding, applicants were required to file an application, either online or via the mail, with the SBA. Only businesses that were in operation before February 1, 2020 and fell within one of several specified categories were eligible to apply. Those categories included small businesses with fewer than 500 employees, sole proprietors, independent contractors, and various non-profit organizations.

7. As part of any application for EIDL funding, an applicant's authorized representative was required to provide and certify certain information about the business and its owner or agent under penalty of perjury. That included information about the applicant business's legal and trade names, entity category, employer identification number, address, establishment date, gross revenues and cost of goods sold for the twelve months prior to January 31, 2020, and number of employees as of January 31, 2020. It further included information about the business owner or agent's name, social security number, birth date, address, and contact information.

8. The SBA relied upon the information certified in the applications when deciding whether, and in what amount, an applicant business should be approved for and receive EIDL funding.

9. The defendant, JAIME JONES, was a resident of Munhall, Pennsylvania and the purported owner of businesses including Ms. J's Catering Service and Aunnie's Day and Overnight Childcare.

THE SCHEME AND ARTIFICE TO DEFRAUD

10. From in and around May 2020, and continuing thereafter to in and around September 2020, in the Western District of Pennsylvania, the defendant, JAIME JONES, and others both known and unknown to the grand jury, devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, well knowing at the time that the pretenses, representations and promises were false and fraudulent when made.

11. It was part of the scheme and artifice to defraud that, via Facebook and other means of communication, the defendant, JAIME JONES, encouraged others to apply for EIDL funding and offered to assist them in doing so.

12. It was further part of the scheme and artifice to defraud that, as part of those communications with others, the defendant, JAIME JONES, misleadingly referred to an EIDL advance as, among other things, a "free 10k," a "10k stimulus," and a benefit offered for "being alive." As JONES then knew, only certain small businesses with ten or more employees were eligible to receive a \$10,000 EIDL advance.

13. It was further part of the scheme and artifice to defraud that the defendant, JAIME JONES, obtained from other people their personally identifying information, such as their names, social security numbers, and banking information, which would be necessary to file an application for EIDL funding on their behalf.

14. It was further part of the scheme and artifice to defraud that the defendant, JAIME JONES, did not request information about some of the purported businesses' revenues,

costs, establishment date, or number of employees, even though, as she then knew, that information would be necessary to complete a valid EIDL application.

15. It was further part of the scheme and artifice to defraud that the defendant, JAIME JONES, caused to be filed fraudulent applications for EIDL funding on behalf of herself and others.

16. It was further part of the scheme and artifice to defraud that the defendant, JAIME JONES, caused to be filed applications for EIDL funding representing that the named applicant was a small business in operation before February 1, 2020 when, as the defendant, JAIME JONES, then knew, that representation was false in whole or in part.

17. It was further part of the scheme and artifice to defraud that the defendant, JAIME JONES, caused to be filed applications for EIDL funding representing that the named applicants had ten or more employees as of January 31, 2020. These representations, which the defendant, JAIME JONES, then knew were false, were intended to maximize the amount of the EIDL advance that could be received by the applicant.

18. It was further part of the scheme and artifice to defraud that the defendant, JAIME JONES, caused to be filed applications for EIDL funding making representations about the applicant's revenues and cost of goods sold for the year prior to January 31, 2020. As the defendant, JAIME JONES, then knew, these representations were false.

19. It was further part of the scheme and artifice to defraud that the defendant, JAIME JONES, requested compensation, in the form of money and investments in her business ventures, from those for whom she had fraudulently obtained EIDL funding.

THE WIRE COMMUNICATIONS

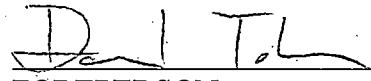
20. On or about the following dates, in the Western District of Pennsylvania, the defendant, JAIME JONES, for the purpose of executing and attempting to execute the scheme and artifice to defraud, did cause to be transmitted in interstate commerce, by means of a wire communication, the following signals, each of which is a separate count of this Indictment:

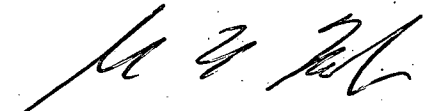
<b>Count</b>	<b>Date</b>	<b>Description of Signal</b>
One	June 17, 2020	Fraudulent EIDL funding application submitted on behalf of an individual with initials J.H., routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Two	June 17, 2020	Fraudulent EIDL funding application submitted on behalf of a non-profit organization, routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Three	June 25, 2020	Fraudulent EIDL funding application submitted on behalf of Ms. J's Catering Service, routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Four	June 25, 2020	Fraudulent EIDL funding application submitted on behalf of an individual with initials S.J., routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Five	June 25, 2020	Fraudulent EIDL funding application submitted on behalf of an individual with initials T.V., routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Six	June 26, 2020	Fraudulent EIDL funding application submitted on behalf an individual with initials E.K., routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Seven	June 26, 2020	Fraudulent EIDL funding application submitted on behalf an individual with initials E.W., routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Eight	June 29, 2020	Fraudulent EIDL funding application submitted on behalf of Ms. J's Catering Service, routed electronically from Munhall, PA to an SBA server in West Des Moines, IA

Count	Date	Description of Signal
Nine	July 2, 2020	Fraudulent EIDL funding application submitted on behalf an individual with initials M.C., routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Ten	July 10, 2020	Fraudulent EIDL funding application submitted on behalf an individual with initials J.W., routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Eleven	July 19, 2020	Fraudulent EIDL funding applicant submitted on behalf of Aunnie's Day and Overnight Childcare, routed electronically from Munhall, PA to an SBA server in West Des Moines, IA
Twelve	August 23, 2020	Fraudulent EIDL funding application submitted on behalf of Ms. J's, routed electronically from Munhall, PA to an SBA server in West Des Moines, IA

In violation of Title 18, United States Code, Section 1343.

A True Bill,

  
 FOREPERSON

  
 STEPHEN R. KAUFMAN  
 Acting United States Attorney  
 PA ID No. 42108

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FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JAIME JONES

Criminal No. **21-417**  
[UNDER SEAL]

CERTIFICATION AND NOTICE FOR FILING PRETRIAL MOTIONS

I hereby certify that I have been notified by the United States Magistrate Judge that all pretrial motions must be filed within fourteen (14) days of Arraignment unless the Court extends the time upon written application made within said fourteen (14) day period.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Attorney for Defendant  
JAIME JONES

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v.

JAIME JONES

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[UNDER SEAL]

ARRAIGNMENT PLEA

Defendant JAIME JONES

being arraigned, pleads \_\_\_\_\_

in open Court this \_\_\_\_\_ day of

\_\_\_\_\_, 20 \_\_\_\_\_

\_\_\_\_\_  
(Defendant's Signature)

\_\_\_\_\_  
(Attorney for Defendant)





Date arrested or date continuous U.S. custody began: \_\_\_\_\_

Defendant: \_\_\_\_\_ is in custody       X  is not in custody

Name of Institution: \_\_\_\_\_

Custody is on: \_\_\_\_\_ this charge      \_\_\_\_\_ another charge

\_\_\_\_\_ another conviction

\_\_\_\_\_ State      \_\_\_\_\_ Federal

Detainer filed: \_\_\_\_\_ yes      \_\_\_\_\_ no

Date detainer filed: \_\_\_\_\_

Total defendants:  1

Total counts:  12

Data below applies to defendant No.:  1

Defendant's name:  Jaime Jones

SUMMARY OF COUNTS

<u>COUNT</u>	<u>U.S. CODE</u>	<u>OFFENSE</u>	<u>FELONY</u>	<u>MISDEMEANOR</u>
1-12	18 U.S.C. § 1343	Wire Fraud	X	

I certify that to the best of my knowledge the above entries are true and correct.

DATE:  September 28, 2021

/s/Jeffrey R. Bengel   
 JEFFREY R. BENGEL  
 Assistant U.S. Attorney  
 DC ID No. 1018621