

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

TARONE LA DALE WOODS,

Defendant.

20-CR-197

Case No.

[18 U.S.C. §1001]

CRIMINAL INFORMATION

The United States of America charges that:

Count One
False Statements
18 U.S.C. § 1001(a) and 2

1. In or about May 2020, in the Eastern District of Wisconsin and elsewhere, the defendant,

TARONE LA DALE WOODS (“WOODS”),

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, namely, the Small Business Administration, those being: on or about May 18, 2020, **WOODS** signed, initialed, and submitted an SBA Form 2483 Paycheck Protection Program Borrower Application Form knowing the form contained false information regarding his company’s eligibility for a Paycheck Program loan, including that:

- a. The company was in operation on February 15, 2020;
- b. The company had 23 employees for whom it paid salaries and payroll taxes; and
- c. The company’s average monthly payroll was \$92,000.

All in violation of Title 18 United States Code, Section 1001(a) and 2.

FORFEITURE ALLEGATION


2. Pursuant to 18 U.S.C. § 981(a)(1)(D) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of false statements, in violation of 18 U.S.C. § 1001, as alleged in this Information, the defendant shall forfeit to the United States of America all property, real and personal, which constitutes and is derived from proceeds traceable to the scheme to defraud. The property to be forfeited includes, but is not limited to, a money judgment in the amount of the total loss caused by the defendant's criminal conduct, as determined by the Court at sentencing.

3. 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 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).

Respectfully submitted,



MATTHEW D. KRUEGER
United States Attorney

DANIEL S. KAHN
Acting Chief, Fraud Section
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United States Department of Justice

By:

/s/Laura Connelly_____
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