

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

UNITED STATES OF AMERICA

Case No. 1:24-CR-44

v.

INDICTMENT

GERARD TOWNS
aka NOLOVE SHINE,
MALCOLM JEFFREY
aka MALCOLM JEFFERY, and
RAVEN WOOD
aka RAVEN LASHAWN,

Defendants.

Violations:

Conspiracy to Commit Mail Fraud
18 U.S.C. § 1349

Aggravated Identity Theft
18 U.S.C. § 1028A

Forfeiture:
18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(1)
28 U.S.C. § 2461

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

BACKGROUND

Unemployment Insurance and Pandemic Relief Funding

1. Unemployment Insurance ("UI") was a joint state and federal program that provided monetary benefits to eligible beneficiaries. UI benefit payments were intended to provide temporary financial assistance to lawful workers who were unemployed through no fault of their own. Beginning in or around March 2020, in response to the COVID-19 pandemic, several federal programs expanded UI eligibility and increased UI benefits, including through the Pandemic Unemployment Assistance Program ("PUA") and Federal Pandemic Unemployment Compensation ("FPUC").

2. Additionally, between in or around August 2020 and in or around December 2020, the federal government provided grants to all U.S. states and territories from the Disaster Relief Fund managed by the Federal Emergency Management Agency ("FEMA") under the Lost Wages Assistance Program ("LWAP") to deal with substantial increases in the volume of UI claims resulting from the pandemic.

Georgia Department of Labor

3. The Georgia Department of Labor ("GaDOL") oversaw and administered the UI program in the State of Georgia. To establish a UI claim, a Georgia claimant must have worked within the state and received at least minimum wage earnings during a specified base period, which was the specific period used to determine whether the claimant earned enough wages to make a UI claim.

4. A claimant seeking UI benefits in the State of Georgia filed an online application through the GaDOL website, which required the claimant to identify his or her employer and provide his or her wages and base period of employment, as well as personally identifiable information ("PII"), including the claimant's name, date of birth, Social Security number, and address. The GaDOL relied upon the information in these applications to determine UI benefits eligibility.

5. When a UI claim was approved, the GaDOL distributed state and federal UI benefits to the claimant. At the claimant's option, these benefits could be loaded onto a debit card issued through the GaDOL and its contracted vendors. The debit card was generally mailed via the U.S. Postal Service to the address provided by the claimant.

6. Once received by a claimant in the mail, a debit card containing UI benefit payments had to be activated with the vendor online or via phone. Once activated, a debit card could be used, like many commercially available debit cards or “prepaid” cards, for retail transactions and to withdraw cash or send cash to others at banks, ATMs, or other money services businesses.

Defendants

7. **GERARD TOWNS aka NOLOVE SHINE** was a resident of Cordele, Georgia.

8. **MALCOLM JEFFREY aka MALCOLM JEFFERY** was a resident of Cordele, Georgia.

9. **RAVEN WOOD aka RAVEN LASHAWN** was a resident of Cordele, Georgia.

COUNT ONE
(18 U.S.C. § 1349)
Conspiracy to Commit Mail Fraud

10. The allegations in Paragraphs 1 through 9 of this Indictment are realleged and incorporated here.

11. Beginning in or around March 2020 and continuing until in or around November 2022, in the Middle District of Georgia and elsewhere, Defendants

GERARD TOWNS aka NOLOVE SHINE,
MALCOLM JEFFREY aka MALCOLM JEFFERY,
and RAVEN WOOD aka RAVEN LASHAWN

did knowingly and intentionally, that is, with the intent to advance the conspiracy, combine, conspire, and agree with each other and others, both known and unknown to

the Grand Jury, to commit the offense of mail fraud, to wit: to knowingly, and with the intent to defraud, having devised and intending 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, knowing such pretenses, representations, and promises were false and fraudulent when made, place and cause to be placed in a Post Office or authorized depository for mail, a thing to be sent and delivered by the Postal Service or any private or commercial interstate carrier, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1341.

Purpose and Object of the Conspiracy

12. The purpose and object of the conspiracy was for Defendants and others to (a) submit and cause to be submitted false and fraudulent UI claims in order to obtain UI benefits to which they were not entitled; and (b) conceal the submission of the false and fraudulent claims and the existence of the conspiracy.

Manner and Means

13. The manner and means by which Defendants and their co-conspirators sought to accomplish, and did accomplish, the purpose and object of the conspiracy included but were not limited to the following:

14. As part of the conspiracy, **GERARD TOWNS** aka **NOLOVE SHINE**, **MALCOLM JEFFREY** aka **MALCOLM JEFFERY**, and **RAVEN WOOD** aka **RAVEN LASHAWN** and other co-conspirators registered and operated multiple employer accounts with the GaDOL through its website, or "portal," including but not limited to "Down N Dirty Transportation LLC."

15. Defendants and their co-conspirators fabricated lists of purported employees for the companies by compiling fraudulently obtained PII, or PII of some co-conspirators, to upload or cause to be uploaded to the GaDOL portal accounts associated with the employers.

16. Defendants and their co-conspirators fraudulently obtained PII for use in the conspiracy.

17. Defendants and their co-conspirators exchanged and shared fraudulently obtained PII with each other for the purposes of filing fraudulent UI claims with the GaDOL.

18. Defendants and their co-conspirators used the fraudulently obtained PII to make, and cause to be made, material misrepresentations to GaDOL, including that the victims whose PII was fraudulently obtained (1) were formerly employed by the employers, and (2) were eligible recipients of the claimed UI benefits.

19. Defendants and their co-conspirators provided false information to the GaDOL with the understanding that the GaDOL would rely on the information in the fraudulent claims to approve the payment of UI benefits, and issue debit cards in the names of the purported claimants whose PII had been fraudulently obtained.

20. Through their submission of false and fraudulent UI claims, Defendants and their co-conspirators caused these debit cards to be placed into a Post Office or authorized depository for mail and sent and delivered by the Postal Service or private or commercial interstate carriers to locations in and around Cordele and Vienna, Georgia, accessible to Defendants and other co-conspirators. For example:

a. Defendants and their co-conspirators caused a debit card bearing an account number ending in 8634 in the name of K.B. to be mailed to an address on 13th Ave. E. in Cordele, Georgia;

b. Defendants and their co-conspirators caused a debit card bearing an account number ending in 4742 in the name of A.A. to be mailed to an address on 13th Ave. E. in Cordele, Georgia;

c. Defendants and their co-conspirators caused a debit card bearing an account number ending in 4186 in the name of L.W. to be mailed to an address on 24th Ave. W. in Cordele, Georgia; and

21. Defendants obtained debit cards associated with the employers and based on the fabricated lists of terminated employees, even though Defendants knew they were not entitled to the UI benefits loaded on the debit cards.

22. Defendants and their co-conspirators conducted and caused to be conducted financial transactions with the fraudulent proceeds on the debit cards by initiating money transfers, purchasing money orders from retailers and grocery stores, and withdrawing cash from ATMs.

23. In total, Defendants and their co-conspirators filed and caused to be filed over 2,500 fraudulent UI claims with the GaDOL and stole at least approximately \$9 million of UI benefits meant to help unemployed persons during the COVID-19 pandemic.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(18 U.S.C. § 1028A)
Aggravated Identity Theft

24. The allegations in Paragraphs 1 through 23 of this Indictment are realleged and incorporated here.

25. Between on or about October 6, 2021, and on or about November 1, 2021, in the Middle District of Georgia and elsewhere, Defendant

GERARD TOWNS aka NOLOVE SHINE

did knowingly possess and use, without lawful authority, a means of identification of another person, namely, the name, Social Security number, and date of birth of another person, L.W., during and in relation to the felony violation of conspiracy to commit mail fraud, as alleged in Count One of the Indictment.

All in violation of Title 18, United States Code, Section 1028A.

FORFEITURE NOTICE

The Grand Jury further alleges that:

1. Upon conviction of the offense(s) in violation of Title 18, United States Code, Section 1349, in connection with Title 18, United States Code, Section 1341 set forth in Count One as alleged in this Indictment, the defendant(s),

GERARD TOWNS aka NOLOVE SHINE,
MALCOLM JEFFREY aka MALCOLM JEFFERY,
and RAVEN WOOD aka RAVEN LASHAWN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or

personal, which constitutes or is derived from proceeds traceable to said violation(s), or a conspiracy to commit such offense; and/or any property, real or personal, involved in such offense(s), or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1), including, but not limited to, a personal money judgment in an amount to be determined.

2. If any of the property described above, as a result of any act or omission of the defendant(s):

- 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 that 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 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), through Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982, Title 28, United States Code, Section 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL

/s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

Glenn S. Leon
Chief, Fraud Section
U.S. Department of Justice

By: 

Lyndie Freeman
Trial Attorney

Siji Moore
Trial Attorney

Filed this 10 day of Dec 2024.


Deputy Clerk