MAM

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

BRANDI WRIGHT

No. 1:26-cr-00201
Judge LaShonda A. Hunt
Magistrate Judge Keri L. Holleb Hotaling
RANDOM / Cat. 3

Violation: Title 18, United States Code, Section 1343

The UNITED STATES ATTORNEY charges:

1. At times material to this Information:

The Small Business Administration

a. The U.S. Small Business Administration ("SBA") was a United States government agency that provided economic support to small businesses.

The Paycheck Protection Program

b. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic.

c. One source of relief provided by the CARES Act was the authorization of up to $349 billion in forgivable loans to small businesses and sole proprietors for job retention and certain other expenses, through a program called the Paycheck Protection Program ("PPP"). In or around April 2020, Congress authorized over $320 billion in additional funding for PPP loans.

d. To obtain a PPP loan, a business, sole proprietor, or self-employed individual submitted a PPP loan application, which was signed by the applicant or an authorized representative of the business. The PPP loan application required the applicants to acknowledge the program rules and make certain affirmative certifications regarding the eligibility of the business, proprietorship, or individual. In the application, businesses, sole proprietors, and self-employed individuals were required to provide, among other things, their number of employees and average monthly payroll. This figure was used to calculate the applicant's eligibility and the amount of money the business could receive under the PPP. Applicants were also required to make good faith certifications, including that economic uncertainties had necessitated their loan requests for continued business operations.

e. PPP loan proceeds were required to be used by the business, sole proprietorship, or self-employed individual for certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven by the SBA if the business, sole proprietorship, or self-employed individual spent the loan proceeds on these items within a designated period of time and used at least a certain percentage of the PPP loan for payroll expenses.

f. To gain access to funds through the PPP, businesses, sole proprietorships, and self-employed individuals applied to financial institutions participating in the PPP and received the loans directly from those financial institutions as the lender.

g. Businesses, sole proprietors, and self-employed individuals that obtained PPP loans and used the full loan amount were allowed to obtain additional funds through the PPP by submitting a Second Draw Borrower Application Form ("Second Draw Application"), which was signed by the applicant or an authorized representative of the business. The Second Draw Application required the applicants to again acknowledge the program rules and make certain affirmative certifications regarding the eligibility of the business, and again provide their number of employees and average monthly payroll. These figures were again used to calculate the applicant's eligibility and the amount of money the business could receive under the PPP. Applicants were again required to make good faith certifications, including that economic uncertainties had necessitated their loan requests for continued business operations and that the applicants had used the full amount of the initial PPP loan only for eligible expenses.

h. Participating lenders required applicants for PPP loans to provide truthful information about the sole proprietorship, self-employed individual, or business and its owner, including truthful information about the applicant's payroll, income, operating expenses, and how the PPP loan would be used, which information was material to lenders' approval, terms, and funding of loans.

WRIGHT

i. BRANDI WRIGHT was a resident of Chicago, Illinois and was a Chicago Police Sergeant.

j. WRIGHT maintained a personal checking account at Bank A ending in 4127, in her own name. WRIGHT also maintained a personal savings account at Bank A ending in 8611, in her own name.

Lender

k. Lender A was a nonbank lender which funded PPP loans to approved borrowers and was headquartered in California. Lender A maintained a bank account at Bank B.

The Scheme to Defraud

2. Beginning in or around April 2021 and continuing through in or around August 2021, in the Northern District of Illinois, and elsewhere,

BRANDI WRIGHT,

defendant herein, together with others known and unknown, knowingly devised, intended to devise, and participated in a scheme to defraud, and to obtain money and property, in connection with applications for PPP funds, by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that WRIGHT, for the purpose of fraudulently obtaining approximately $41,662 in PPP funds, prepared and submitted to Lender A, and caused to be prepared and submitted to Lender A, two applications for loans under the PPP Program on behalf of a business and entity purportedly owned and

operated by WRIGHT that did not exist (the "Fictitious Business"), which applications contained materially false statements and misrepresentations as set forth below.

4. It was further part of the scheme that, on or about April 2, 2021, WRIGHT prepared and submitted and caused to be prepared and submitted to Lender A, a PPP Borrower Application Form for Schedule C Filers Using Gross Income (the "PPP Loan Application"), on behalf of WRIGHT, in which she requested $20,831 in PPP funds, and in which WRIGHT, for the purpose of obtaining the funds, falsely and fraudulently represented that the Fictitious Business was established on January 1, 2018, had gross income in 2020 of $99,989, was in operation as of February 15, 2020, and that all PPP loan proceeds would be used only for business-related purposes, including payroll costs. WRIGHT knew at the time that the Fictitious Business was not established on January 1, 2018, did not have gross income in 2020 of $99,989, was not in operation as of February 15, 2020, and that she intended to use the PPP loan funds for her personal use and benefit.

5. It was further part of the scheme that WRIGHT further falsely and fraudulently represented that:

a. all loan proceeds would be used only for business-related purposes as specified in the loan application;

b. the Fictitious Business was in operation on February 15, 2020, and had not permanently closed;

c. current economic uncertainty made the loan request necessary to support the ongoing operations of the Fictitious Business;

d. the funds would be used to retain workers and maintain payroll, or make payments for mortgage interest, rent, utilities, covered operation expenditures, covered damage costs, covered supplier costs, and covered worker protection expenditures;

e. loan forgiveness would be provided for the above documented expenses and not more than 40% of the forgiven loan amount would be used for non-payroll costs; and

f. the information provided in the application and all supporting documents and forms was true and accurate in all material respects and that WRIGHT understood that knowingly making any false statement is punishable by law. WRIGHT knew at the time she caused the PPP Loan Application to be submitted to Lender A that these representations were false.

6. It was further part of the scheme that, on or about April 2, 2021, WRIGHT prepared and submitted or caused to be prepared and submitted to Lender A, a false IRS tax filing Schedule C (IRS Form 1040) for 2020 that fraudulently represented that the Fictitious Business was a retail bakery and had gross receipts or sales in 2020 in the amount of $99,989 and expenses in the amount of $900, and which falsely substantiated that the business had been in operation prior to 2020. WRIGHT knew at the time the Schedule C was submitted to Lender A that the

Fictitious Business had no gross receipts, sales or expenses, had not been in operation prior to 2020 and that WRIGHT did not file with the IRS an IRS Form 1040 with a Schedule C or any other tax documents showing income or expenses for the Fictitious Business or WRIGHT for 2020.

7. It was further part of the scheme that on or about April 4, 2021, WRIGHT signed a note for SBA Loan No. 669198709, in the amount of $20,831, in favor of Lender A (the "Note"), which set forth the terms that allowed WRIGHT to apply to Lender A for forgiveness of the amount due on the loan equal to the sum of payroll costs, interest on a covered mortgage obligation, rent payment, utility payment, and other specified business expenditures. Under the Note, WRIGHT falsely certified that:

a. current economic uncertainty made the loan necessary to support the ongoing operations of the Fictitious Business;

b. loan funds would be used only to retain workers and to maintain payroll or make other permissible business payments; and

c. the business was in operation on February 15, 2020 and had employees for whom it paid salaries and payroll taxes and had not permanently closed.

8. It was further part of the scheme that, in order to obtain the loan funds, WRIGHT signed the Note knowing that she was in default under the terms of the Note, which provided that WRIGHT was in default if, among other things, she failed

to do anything required by the Note and other loan documents, did not disclose any material fact to Lender A or the SBA, made any materially false or misleading representation to Lender A or the SBA, or failed to pay any taxes when due. At the time WRIGHT signed the Note, WRIGHT knew that she had failed to disclose material facts to Lender A and the SBA and made materially false and fraudulent representations to Lender A in the PPP Loan Application.

9. It was further part of the scheme that, through the submission of WRIGHT's false and fraudulent PPP Loan Application and the Note, WRIGHT caused the SBA to approve a PPP loan for WRIGHT under SBA Loan No. 6691928709 in the amount of $20,831, and caused Lender A on or about April 9, 2021 to deposit funds into WRIGHT's personal bank account in the amount of $20,831.

10. It was further part of the scheme that on or about April 10, 2021, WRIGHT prepared and submitted or caused to be prepared and submitted a Second Draw Borrower Application to Lender A seeking a second draw on her PPP loan in the amount of $20,831, and making the same false and fraudulent representations as she did in her initial PPP Loan Application, including that the Fictitious Business was in operation on February 15, 2020, that the Fictitious Business earned gross income in 2020 in the amount of $99,989, and that the purpose of the loan was to cover payroll costs.

11. It was further part of the scheme that on or about April 20, 2021, WRIGHT signed a note for the Second Draw PPP loan in favor of Lender A, in the

amount of $20,831 (the "Second Draw Note"), under which WRIGHT acknowledged that WRIGHT may apply to Lender A for forgiveness of the amount due on the loan in an amount equal to the sum of payroll costs, interest on a covered mortgage obligation, rent payment, utility payment, and other specified business expenditures. Further, WRIGHT falsely certified under the Second Draw Note that:

a. current economic uncertainty made the loan necessary to support the ongoing operations of the Fictitious Business;

b. loan funds would be used only to retain workers and to maintain payroll or make other permissible business payments; and

c. the business was in operation on February 15, 2020 and had employees for whom it paid salaries and payroll taxes and had not permanently closed.

12. It was further part of the scheme that on or about April 20, 2021, in order to secure the Second Draw PPP loan funds, WRIGHT signed the Second Draw Note knowing that she was in default under the terms of the Second Draw Note, which provided that WRIGHT was in default if, among other things, she failed to do anything required by the Second Draw Note and other loan documents, did not disclose any material fact to Lender A or the SBA, made any materially false or misleading representation to Lender A or SBA, or failed to pay any taxes when due. At the time WRIGHT signed the Second Draw Note, WRIGHT knew that she had

failed to disclose material facts to Lender A and the SBA, and made materially false and fraudulent representations to Lender A and the SBA in the Second Draw Application.

13. It was further part of the scheme that WRIGHT's false and fraudulent representations described above caused the SBA to approve a Second Draw PPP loan for WRIGHT under SBA Loan No. 6691928710 in the amount of $20,831, and caused Lender A on or about April 26, 2021 to deposit funds into WRIGHT's personal bank account in the amount of $20,831.

14. It was further part of the scheme that on or about August 27, 2021, WRIGHT prepared and submitted or caused to be prepared and submitted on her behalf two PPP Loan Forgiveness Application Forms 3508S, one requesting forgiveness for SBA Loan No. 6691928709, under which funds were disbursed on April 9, 2021 in the amount of $20,831; and the other requesting forgiveness for SBA Loan No. 6691928710, under which funds were disbursed on April 26, 2021 in the amount of $20,831. In each of these PPP Loan Forgiveness Applications, WRIGHT falsely represented that WRIGHT had complied with all requirements of the PPP Loan Application and Second Draw Application, including eligible uses of PPP loan proceeds and the amount of PPP loan proceeds that must be used for payroll costs.

15. It was further part of the scheme that WRIGHT's false representations in her Loan Forgiveness Applications caused the SBA, on August 31, 2021, to issue WRIGHT two Notices of Paycheck Protection Program Forgiveness Payment, both in the amount of $20,831, one for SBA Loan No. 6691928709, and one for SBA Loan No.

6691928710, so that WRIGHT did not have to pay back any of the funds that she received for either PPP loan.

16. It was further part of the scheme that WRIGHT used the PPP funds that Lender A disbursed based on the false and fraudulent PPP Loan Application and Second Draw Application for personal expenses, including to pay personal credit card debt, purchase personal goods and services and make cash withdrawals, all for her personal use and benefit.

17. It was further part of the scheme that WRIGHT misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

18. On or about April 9, 2021, at Orland Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRANDI WRIGHT,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted in interstate commerce by means of a wire communication certain writings, signs, and signals, namely, an interstate wire transmission in the amount of approximately $20,831 from a bank account associated with Lender A at Bank B to a bank account at Bank A ending in 4127, which funds represented the proceeds of SBA loan no. 6691928709;

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

MATTHEW GETTER
Digitally signed by MATTHEW GETTER
Date: 2026.05.03 14:14:27 -05'00'
for ASB

UNITED STATES ATTORNEY