

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
TERRELL FULLER	:	18 U.S.C. § 1349

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

BACKGROUND

1. At various times relevant to this Information:
 - a. Defendant TERRELL FULLER (“FULLER”) was a resident of New York.
 - b. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or around March 2020 that was designed to provide emergency financial assistance to Americans suffering the economic effects of the COVID-19 pandemic. The CARES Act enabled the Small Business Association (“SBA”) to offer funding through the Economic Injury Disaster Loan (“EIDL”) program to business owners negatively affected by the COVID-19 pandemic. The EIDL program provided low-interest financing and grants to small businesses, renters, and homeowners in regions affected by declared disasters, like the COVID-19 pandemic.

c. To obtain an EIDL, a qualifying business applied to the SBA and provided certain information about its operations through an online portal. The EIDL approval process required applicants to supply minimal eligibility documentation and to affirm that the information in the application was true and correct under the penalty of perjury and applicable criminal statutes. The amount of an EIDL was based, in part, on the information provided by the applicant—primarily, gross revenue minus cost of goods sold, divided by two.

d. Business-1 was located in Louisiana.

THE CONSPIRACY

2. From at least in or around September 2021 through in or around March 2023, in the District of New Jersey and elsewhere, the defendant,

TERRELL FULLER,

did knowingly and intentionally conspire with others to devise and intend to devise a scheme and artifice to defraud individuals and entities, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, including a November 9, 2021 wire transmission sent from a location in New Jersey to a location outside of New Jersey, contrary to Title 18, United States Code, Section 1343.

GOAL OF THE CONSPIRACY

3. The goal of the conspiracy was for FULLER and his co-conspirators to enrich themselves by fraudulently obtaining money and property, including money from the SBA and money and property from other victim entities and individuals using personal identifying information belonging to others without their knowledge or consent.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that:

a. FULLER and his co-conspirators submitted a fraudulent application (the “Fraud Application”) to the SBA for an EIDL on behalf of Business-1 without Business-1’s knowledge or authorization.

b. FULLER and his co-conspirators caused the SBA to provide approximately \$1,200,000 in response to the Fraud Application. For instance, on or about November 9, 2021, the SBA transferred approximately \$500,000 into a bank account controlled by Fuller and his co-conspirators in response to the Fraud Application. This transfer caused a wire transfer to occur between a location in Bergen County, New Jersey and a location outside of New Jersey.

c. FULLER and his co-conspirators opened bank accounts in the names of various entities and individuals (the “Bank Accounts”).

d. FULLER and his co-conspirators deposited illegally obtained or fraudulent checks into the Bank Accounts, including funds obtained from the Fraud Application.

e. FULLER and his co-conspirators withdrew and attempted to withdraw money from the Bank Accounts.

f. FULLER used personal identification information belonging to at least one other individual to rent locations to live in New York. Fuller then failed to pay more than \$400,000 in rent and fees for those locations.

g. FULLER and his co-conspirators obtained more than \$1,500,000 in money and property through their fraudulent actions.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

Upon conviction of the offense charged in this Information, the government will seek forfeiture from defendant TERRELL FULLER, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 1349.

Substitute Assets Provision

If by any act or omission of defendant TERRELL FULLER any of the property subject to forfeiture herein:

- 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 subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant TERRELL FULLER up to the value of the property described in this forfeiture allegation.



PHILIP R. SELLINGER
UNITED STATES ATTORNEY