

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Criminal No. 21-  
 :  
 :  
 MAURICE MILLS : 18 U.S.C. § 1343  
 : 18 U.S.C. § 2

**INFORMATION**

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

**BACKGROUND**

1. At various times relevant to this Information:
  - a. Defendant MAURICE MILLS ("MILLS") was a resident of New Jersey and New York.
  - b. On or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (the "CARES Act") was signed into law. The CARES Act created a new temporary federal unemployment insurance program called Pandemic Unemployment Assistance ("PUA"). PUA provided unemployment insurance benefits ("UIBs") for individuals who were not eligible for other types of unemployment (e.g., the self-employed, independent contractors, gig economy workers). The CARES Act also created a new temporary federal program called Federal Pandemic Unemployment Compensation ("FPUC") that

provided an additional \$600 weekly benefit to those eligible for PUA and regular UIBs.

c. The New York State Department of Labor administered and managed the regular unemployment and PUA programs in the State of New York. Thus, subject to certain eligibility requirements, a person who was unemployed, but who used to be employed by an employer in the State of New York, could apply to receive UIBs from the State of New York.

#### THE SCHEME TO DEFRAUD

2. From at least in or about August 2020 through in or about September 2020, in the District of New Jersey and elsewhere, the defendant,

MAURICE MILLS,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud the State of New York and individuals, and to obtain money and property from the State of New York, 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 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 wire communication from inside of New Jersey to outside of New Jersey, as more fully set forth below.

GOAL OF THE SCHEME TO DEFRAUD

3. The goal of the scheme and artifice to defraud was for MILLS to enrich himself by obtaining money from the State of New York by submitting fraudulent UIBs in the names of other individuals.

MANNER AND MEANS OF THE SCHEME TO DEFRAUD

4. It was part of the scheme and artifice to defraud that:
- a. MILLS obtained personal identification information, including names, belonging to other individuals.
  - b. MILLS submitted applications for UIBs to the State of New York using other individuals' personal identification information.
  - c. MILLS caused the State of New York to approve and provide more than \$450,000 in response to the false UIB applications described herein.

5. On or about September 25, 2020, for the purpose of executing the scheme and artifice to defraud, in the District of New Jersey, and elsewhere, the defendant,

MAURICE MILLS,

knowingly and intentionally transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, namely a UIB application, from a location in New Jersey to a location in New York.

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

## **FORFEITURE ALLEGATION**


1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense charged in this Information, the government will seek forfeiture from defendant MILLS, 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 violations of Title 18, United States Code, Section 1343.

3. If by any act or omission of defendant MILLS 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 MILLS up to the value of the property described in this forfeiture allegation.

  
RACHAEL A. HONIG  
ACTING UNITED STATES ATTORNEY