

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

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
	:	
v.	:	Crim. No. 22-
	:	
ERIC BULLARD	:	18 U.S.C. § 1956

I N F O R M A T I O N

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

1. At all times relevant to this Information:

- a. Defendant ERIC BULLARD was a resident of California.
- b. Coconspirator-1 was also a resident of California.
- c. Victim-1 was a resident of Bergen County, New Jersey.
- d. The New Jersey Law Firm was a law firm with its office in Clifton, New Jersey.
- e. A business email compromise ("BEC") was a method of wire fraud often targeting businesses, entities, or individuals working on business transactions involving high-dollar wire transactions. The fraud was carried out by compromising and/or "spoofing" legitimate email accounts through social engineering or computer intrusion techniques to cause employees of the target company (or other individuals involved in legitimate business transactions) to conduct unauthorized transfers of funds, most often to accounts controlled by the fraud perpetrators.

f. The U.S. Small Business Administration (“SBA”) was an independent agency of the federal government created to aid, counsel, assist, and protect the interests of small business concerns, preserve free competitive enterprise, and maintain and strengthen the overall economy of the United States.

g. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or about March 2020 that was designed to provide emergency financial assistance to certain families and individuals suffering the economic effects of the COVID-19 pandemic. The CARES Act authorized the U.S. Department of Treasury to issue economic impact payment (“EIP”) checks to certain eligible taxpayers.

h. The Economic Injury Disaster Loan (“EIDL”) program was an SBA program that provided low-interest financing to small businesses, renters, and homeowners in regions affected by declared disasters. The CARES Act authorized the SBA to provide EIDLs to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic. EIDL funds were issued directly by the SBA.

2. From in or around January 2020 through in or around August 2020, in Bergen County, in the District of New Jersey and elsewhere, the defendant

ERIC BULLARD,

did knowingly combine, conspire, and agree with others, including Coconspirator-1, to conduct and attempt to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified

unlawful activity, that is, wire fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

The Goal of the Conspiracy

3. The goal of the conspiracy was for BULLARD and others to conduct financial transactions involving money obtained from other coconspirators' fraud schemes, including business email compromises and fraudulent loans obtained as a result of the CARES Act, to conceal and disguise the nature, source, and ownership of the funds.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that BULLARD and other coconspirators created businesses and opened business bank accounts to be used to receive and transfer fraud proceeds.

5. It was part of the conspiracy that the coconspirators conducted BECs and directed unwitting victims to send money to accounts controlled by other coconspirators, including BULLARD.

a. For example, in or around June 2020, Victim-1, a resident of Bergen County, New Jersey, communicated via email with the New Jersey Law Firm, which was advising Victim-1 on a real estate transaction. A coconspirator

engaged in a BEC and sent an email to Victim-1 purporting to be on behalf of the New Jersey Law Firm in relation to the pending real estate transaction with fraudulent instructions to wire approximately \$560,000 to a bank account controlled by BULLARD.

b. On or about June 12, 2020, in reliance on the fraudulent instructions, Victim-1 wired approximately \$560,000 (the "Victim-1 Wire") to a bank account controlled by BULLARD. BULLARD was not involved in the real estate transaction.

6. It was part of the conspiracy that BULLARD and other coconspirators permitted money obtained by the SBA as a result of the CARES Act to be deposited into their accounts to conceal and disguise that the SBA EIDL loans were obtained fraudulently.

a. For example, on or about July 12, 2020, a fraudulent EIDL application on behalf of a pharmacy company with a listed location in Idaho was submitted to the SBA. The loan was subsequently approved and approximately \$145,400 was transferred to Coconspirator-1's bank account, which was a business bank account for a purported property rental business.

b. On or about July 13, 2020, a fraudulent EIDL application on behalf of a pharmacy company with a listed location in Colorado was submitted to the SBA. The loan was subsequently approved and approximately \$143,100 was transferred to a bank account controlled by BULLARD.

7. It was part of the conspiracy that BULLARD and other coconspirators transferred and withdrew fraudulently obtained money from their

accounts to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the coconspirators' wire fraud. For example:

a. On or about June 12, 2020, after receiving the Victim-1 Wire, BULLARD made several cash withdrawals from his account and transferred much of the fraudulently obtained money to other coconspirators.

b. On or about July 16, 2020, after receiving EIDL loan money from the fraudulent EIDL application on behalf of the Idaho pharmacy company, Coconspirator-1's account transferred approximately \$51,395 to a bank account controlled by BULLARD.

All in violation of Title 18, United States Code, Section 1956(h).


FORFEITURE ALLEGATION

1. As a result of committing the offense charged in this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such money laundering offense, and all property traceable to such property.

2. 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
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, 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), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in Forfeiture Allegation paragraph 1.


PHILIP R. SELLINGER
United States Attorney