

**FILED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

JAN 25 2024

By DAVID CREWS, CLERK  
Deputy

UNITED STATES OF AMERICA )

Criminal No. 3:24-CR-5

v. )

Count One: Conspiracy - Wire Fraud  
(18 U.S.C. § 1349)

ZIPORA HUDSON )  
MONTREAL HUDSON )  
DEANDRE JONES )

Counts 2 – 4: Wire Fraud  
(18 U.S.C. §§ 1343 and 2)

Count 5: Conspiracy – Money Laundering  
(18 U.S.C. § 1956(h))

Counts 6 - 7: Money Laundering  
(18 U.S.C. §§ 1956(a)(1)(A)(1) and 2)

The Grand Jury charges that:

**INDICTMENT**

At all times relevant to this Indictment:

**General Allegations**

1. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a Federal law enacted in March 2020 designed to provide emergency financial assistance to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic. The CARES Act provided a source of funding for small businesses affected by the economic downturn associated with the Coronavirus Pandemic, known as the Paycheck Protection Program (“PPP”) loans.

2. The PPP was a COVID-19 pandemic relief program administered by the Small Business Administration (“SBA”) that provided forgivable loans to small businesses for job retention and certain other expenses. The PPP permitted participating third-party lenders to approve and disburse SBA-backed PPP loans to cover payroll, fixed debts, utilities, rent/mortgage,

accounts payable and other bills incurred by qualifying businesses during, and resulting from, the COVID-19 pandemic. PPP loans were fully guaranteed by the SBA.

3. To obtain a PPP loan, a qualifying business had to submit a PPP loan application, which was signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications to be eligible to obtain the PPP loan, including that the business was in operation and either had employees for whom it paid salaries and payroll taxes or paid independent contractors. A business applying for a PPP loan was required to provide documentation showing its payroll expenses, such as filed federal income tax documents.

4. PPP loan applications were electronically submitted or caused to be submitted by the borrower and received through SBA servers located in Virginia or Oregon. [Virginia – PPP Round 1 or 2 or Oregon if submitted after 1/11/2021 in Round 3]. Once approved, the business received the PPP loan proceeds via an electronic funds transfer from the third-party lender to a financial account under the control of the business.

5. The proceeds of a PPP loan could be used for certain specified items, such as payroll costs, costs related to the continuation of group health care benefits, or mortgage interest payments. The proceeds of a PPP loan were not permitted to be used by the borrowers to purchase consumer goods, automobiles, personal residences, clothing, jewelry, to pay the borrower's personal federal income taxes, or to fund the borrower's ordinary day-to-day living expenses unrelated to the specified authorized expenses.

6. A Schedule C Profit/Loss from Business form is a schedule attached to a U.S. Individual Income Tax Return, Form 1040, that taxpayers use to report income and expenses from a business owned by the taxpayer. A Schedule C was required as part of a typical PPP application.

**COUNT 1**  
**Conspiracy to Commit Wire Fraud**  
**(18 U.S.C. § 1349)**

**The Conspiracy**

7. Beginning at a date unknown to the Grand Jury, but from on or about January of 2021, and continuing through August of 2021, in the Northern District of Mississippi, and elsewhere, the defendants ZIPORA HUDSON, MONTREAL HUDSON and DEANDRE JONES, with others both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire and agree with each other, and with others known and unknown to the Grand Jury, to devise a scheme to defraud others, and to obtain money by means of false and fraudulent pretenses, representations and promises; and for the purpose of executing the scheme to defraud, caused a signal to be transmitted by means of a wire communication in interstate commerce, in violation of 18 U.S.C. § 1343.

**Manner and Means of the Conspiracy**

8. The manner and means by which the defendants sought to accomplish the purpose of the conspiracy included, among others, the following:

A. The defendants devised a scheme to defraud financial institutions in order to obtain PPP loans on behalf of other borrowers by causing materially false and fraudulent PPP loan applications to be filed with PPP lenders. The materially false and fraudulent PPP applications caused the PPP lenders to approve the PPP loans. For the purpose of executing the above scheme to defraud, defendants caused the PPP lenders to transmit, by means of interstate wire communications, PPP loan proceeds into the bank accounts of the borrowers.

B. The borrowers paid a portion of the fraudulently obtained PPP funds to the defendants. Such fees paid by the borrowers to the defendants ranged from \$2,000 to \$5,000 per loan.

C. The defendants falsified and fabricated supporting documentation required for PPP loan applications. Said fabrication was on behalf of other borrowers. For instance, a Schedule C Profit/Loss from Business form is a schedule attached to a U.S. Individual Income Tax Return, Form 1040, that taxpayers use to report income and expenses from a business owned by the taxpayer. A Schedule C was required as part of a typical PPP application and was falsified and fabricated by defendants in order to induce the financial institutions to make the PPP loans.

D. The defendants caused materially false PPP applications to be submitted of on behalf of borrowers, lying about, among other things, the existence and operation of businesses and business income. The defendants assisted numerous borrowers, including and not limited to those identified in this indictment, in submitting false and fraudulent PPP loan applications.

E. The defendants assisted borrowers in defrauding financial institutions by telling borrowers that they qualified for PPP loans when such borrowers did not qualify.

F. ZIPORA HUDSON was the manager of Zippy Bee, LLC, a tax preparing service in Charleston, MS (Zippy Bee). ZIPORA HUDSON used her position at the Zippy Bee to assist individual borrowers in filing false and fraudulent PPP applications and agreements. MONTREAL HUDSON and DEANDRE JONES also assisted borrowers in filing false and fraudulent PPP applications and agreements.

G. ZIPORA HUDSON referred borrowers to MONTREAL HUDSON and DEANDRE JONES in order for MONTREAL HUDSON and DEANDRE JONES to assist said borrowers in filing false and fraudulent PPP applications and agreements.

H. The defendants' fraudulent conduct affected interstate commerce by causing wire transfers of PPP loan proceeds across state lines, and by accessing and submitting the PPP applications across state lines.

#### **Acts in Furtherance of the Conspiracy**

During and in furtherance of the conspiracy, at least one of the co-conspirators committed at least one of the following acts in the Northern District of Mississippi and elsewhere.

9. (BORROWER 1) knew ZIPORA HUDSON prior to obtaining a PPP loan. (BORROWER 1) met with DEANDRE JONES and ZIPORA HUDSON concerning a PPP loan. In furtherance of the scheme to defraud, DEANDRE JONES knowingly and willfully falsified supporting documentation for a PPP loan application. On or about April 23, 2021, with the intent to defraud Benworth Capital, DEANDRE JONES assisted (BORROWER 1) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Benworth Capital Partners, LLC, to approve (BORROWER 1)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #....98901) into (BORROWER 1)'s bank account. (BORROWER 1) then had a portion of the fraudulently obtained PPP funds, approximately \$4,000, paid to DEANDRE JONES.

10. ZIPORA HUDSON knew (BORROWER 2) through the preparation of (BORROWER 2)'s income taxes. ZIPORA HUDSON informed (BORROWER 2) that he/she qualified for a PPP loan. Thereafter, (BORROWER 2) was contacted by MONTREAL

HUDSON, ZIPORA HUDSON's son, and told that MONTREAL HUDSON would assist (BORROWER 2) in obtaining a PPP loan.

A. In furtherance of the scheme to defraud, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 2)'s PPP loan application. On or about March 28, 2021, with the intent to defraud Fountainhead SBF, LLC, MONTREAL HUDSON assisted (BORROWER 2) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Fountainhead SBF LLC to approve (BORROWER 2)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,377 in PPP loan proceeds (Loan #....98703) into (BORROWER 2)'s bank account. (BORROWER 2) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

B. In furtherance of the scheme to defraud, MONTREAL HUDSON again knowingly and willfully falsified supporting documentation for (BORROWER 2)'s PPP loan application. On or about April 23, 2021, with the intent to defraud Benworth Capital Partners, LLC, MONTREAL HUDSON assisted (BORROWER 2) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Benworth Capital Partners, LLC to approve (BORROWER 2)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,377 in PPP loan proceeds (Loan #....18907) into (BORROWER 2)'s bank account. (BORROWER 2) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

11. ZIPORA HUDSON knew (BORROWER 3) through the preparation of (BORROWER 3)'s income taxes. ZIPORA HUDSON informed (BORROWER 3) that she could assist (BORROWER 3) in obtaining a PPP loan. Thereafter, ZIPORA HUDSON informed (BORROWER 3) to contact MONTREAL HUDSON to obtain the PPP loan.

A. In furtherance of the scheme to defraud, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 3)'s PPP loan application. On or about March 28, 2021, with the intent to defraud Fountainhead SBF, LLC, MONTREAL HUDSON assisted (BORROWER 3) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Fountainhead SBF LLC to approve (BORROWER 3)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #....38704) into (BORROWER 3)'s bank account. (BORROWER 3) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

B. In furtherance of the scheme to defraud, MONTREAL HUDSON again knowingly and willfully falsified supporting documentation for (BORROWER 3)'s PPP loan application. On or about April 12, 2021, with the intent to defraud Fountainhead SBF, LLC, MONTREAL HUDSON assisted (BORROWER 3) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Fountainhead SBF, LLC to approve (BORROWER 3)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #....48804) into

(BORROWER 3)'s bank account. (BORROWER 3) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

12. DEANDRE JONES informed (BORROWER 4) that he qualified for a PPP loan because he had a job. DEANDRE JONES offered to assist (BORROWER 4) in obtaining said loan. DEANDRE JONES and (BORROWER 4) met at Zippy Bee's Tax Service. In furtherance of the scheme to defraud, DEANDRE JONES knowingly and willfully falsified supporting documentation for (BORROWER 4)'s PPP loan application. On or about April 24, 2021, with the intent to defraud Benworth Capital Partners, LLC, DEANDRE JONES assisted (BORROWER 4) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Benworth Capital Partners, LLC, to approve (BORROWER 4)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #...18907) into (BORROWER 4)'s bank account. (BORROWER 4) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to DEANDRE JONES.

13. ZIPORA HUDSON knew (BORROWER 5) through the preparation of (BORROWER 5)'s income taxes. (BORROWER 5) met with MONTREAL HUDSON at Zippy Bee's Tax Service, LLC. MONTREAL HUDSON informed (BORROWER 5) that he/she qualified for a PPP loan and offered to assist (BORROWER 5) in obtaining said loan.

A. In furtherance of the scheme to defraud, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 5)'s PPP loan application. On or about April 9, 2021, with the intent to defraud Harvest Small Business Finance, LLC, MONTREAL HUDSON assisted (BORROWER 5) in filing the PPP loan application, which contained materially false and fraudulent representations

made by MONTREAL HUDSON. The fraudulent application caused Harvest Small Business Finance, LLC, to approve (BORROWER 5)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,745 in PPP loan proceeds (Loan #....28800) into (BORROWER 5)'s bank account. (BORROWER 5) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

B. In furtherance of the scheme to defraud, MONTREAL HUDSON again knowingly and willfully falsified supporting documentation for (BORROWER 5)'s PPP loan application. On or about April 16, 2021, with the intent to defraud Harvest Small Business Finance, LLC, MONTREAL HUDSON assisted (BORROWER 5) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Harvest Small Business Finance, LLC, to approve (BORROWER 5)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,745 in PPP loan proceeds (Loan #....08904) into (BORROWER 5)'s bank account. (BORROWER 5) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

14. ZIPORA HUDSON knew (BORROWER 6) through the preparation of (BORROWER 6)'s income taxes. ZIPORA HUDSON informed (BORROWER 6) that he/she qualified for a PPP loan. ZIPORA HUDSON informed (BORROWER 6) that DEANDRE JONES would assist him/her in obtaining the PPP loans. Thereafter, (BORROWER 6) communicated with DEANDRE JONES who offered to assist (BORROWER 6) in obtaining a PPP loan.

A. In furtherance of the scheme to defraud, DEANDRE JONES knowingly and willfully falsified supporting documentation for (BORROWER 6)'s PPP loan application. On or about April 4, 2021, with the intent to defraud Harvest Small Business Finance, LLC, DEANDRE JONES assisted (BORROWER 6) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Harvest Small Business Finance, LLC, to approve (BORROWER 6)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #...28709) into (BORROWER 6)'s bank account. (BORROWER 6) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to DEANDRE JONES.

B. In furtherance of the scheme to defraud, DEANDRE JONES again knowingly and willfully falsified supporting documentation for (BORROWER 6)'s PPP loan application. On or about April 10, 2021, with the intent to defraud Harvest Small Business Finance, LLC, DEANDRE JONES assisted (BORROWER 6) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Harvest Small Business Finance, LLC, to approve (BORROWER 6)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #...08904) into (BORROWER 6)'s bank account. (BORROWER 6) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to DEANDRE JONES.

15. ZIPORA HUDSON knew (BORROWER 7) through the preparation of (BORROWER 7)'s income taxes. DEANDRE JONES informed (BORROWER 7) that he/she

qualified for a PPP loan. Thereafter, DEANDRE JONES offered to assist (BORROWER 7) in obtaining a PPP loan.

A. In furtherance of the scheme to defraud, DEANDRE JONES knowingly and willfully falsified supporting documentation for (BORROWER 7)'s PPP loan application. On or about April 15, 2021, with the intent to defraud Benworth Capital Partners, LLC, DEANDRE JONES assisted (BORROWER 7) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Benworth Capital Partners, LLC, to approve (BORROWER 7)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #....38804) into (BORROWER 7)'s bank account. (BORROWER 7) then had a portion of the fraudulently obtained PPP funds, approximately \$2,500, paid to DEANDRE JONES.

B. In furtherance of the scheme to defraud, DEANDRE JONES again knowingly and willfully falsified supporting documentation for (BORROWER 7)'s PPP loan application. On or about April 20, 2021, with the intent to defraud Harvest Small Business Finance, LLC, DEANDRE JONES assisted (BORROWER 7) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Harvest Small Business Finance, LLC, to approve (BORROWER 7)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$29,166 in PPP loan proceeds (Loan #....79009) into (BORROWER 7)'s bank account.

16. ZIPORA HUDSON informed (BORROWER 8) that he/she qualified for a PPP loan. Thereafter, ZIPORA HUDSON offered to assist (BORROWER 8) in obtaining a PPP loan.

A. In furtherance of the scheme to defraud, ZIPORA HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 8)'s PPP loan application. On or about April 17, 2021, with the intent to defraud Benworth Capital Partners, LLC, ZIPORA HUDSON assisted (BORROWER 8) in filing the PPP loan application, which contained materially false and fraudulent representations made by ZIPORA HUDSON. The fraudulent application caused Benworth Capital Partners, LLC, to approve (BORROWER 8)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,549 in PPP loan proceeds (Loan #....28803) into (BORROWER 8)'s bank account. (BORROWER 8) then had a portion of the fraudulently obtained PPP funds, approximately \$3,000, paid to ZIPORA HUDSON.

B. In furtherance of the scheme to defraud, ZIPORA HUDSON again knowingly and willfully falsified supporting documentation for (BORROWER 8)'s PPP loan application. On or about May 16, 2021, with the intent to defraud Capital Plus Financial, LLC, ZIPORA HUDSON assisted (BORROWER 8) in filing the PPP loan application, which contained materially false and fraudulent representations made by ZIPORA HUDSON. The fraudulent application caused Capital Plus Financial, LLC, to approve (BORROWER 8)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,549 in PPP loan proceeds (Loan #....89001) into (BORROWER 8)'s bank account. (BORROWER 8) then had a portion of the fraudulently obtained PPP funds, approximately \$3,000, paid to ZIPORA HUDSON.

17. MONTREAL HUDSON informed (BORROWER 9) that he/she qualified for a PPP loan and offered to assist (BORROWER 9) in obtaining said loan.

A. In furtherance of the scheme to defraud, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 9)'s PPP loan application. On or about March 31, 2021, with the intent to defraud Fountainhead SBF, LLC, MONTREAL HUDSON assisted (BORROWER 9) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Fountainhead SBF, LLC, to approve (BORROWER 9)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,552 in PPP loan proceeds (Loan #....98704) into (BORROWER 9)'s bank account. (BORROWER 9) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

B. In furtherance of the scheme to defraud, MONTREAL HUDSON again knowingly and willfully falsified supporting documentation for (BORROWER 9)'s PPP loan application. On or about April 22, 2021, with the intent to defraud Benworth Capital Partners, LLC, MONTREAL HUDSON assisted (BORROWER 9) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Benworth Capital Partners, LLC, to approve (BORROWER 9)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,552 in PPP loan proceeds (Loan #...48909) into (BORROWER 9)'s bank account. (BORROWER 9) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

18. (BORROWER 10) knew ZIPORA HUDSON prior to obtaining a PPP loan. ZIPORA HUDSON informed (BORROWER 10) that she helped people obtain PPP loans and told

(BORROWER 10) to contact MONTREAL HUDSON who would assist (BORROWER 10) in obtaining the loan. Thereafter, (BORROWER 10) contacted MONTREAL HUDSON, who offered to assist (BORROWER 10) in obtaining a PPP loan.

A. In furtherance of the scheme to defraud, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 10)'s PPP loan application. On or about April 4, 2021, with the intent to defraud Harvest Small Business Finance, LLC, MONTREAL HUDSON assisted (BORROWER 10) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Harvest Small Business Finance, LLC, to approve (BORROWER 10)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$19,976 in PPP loan proceeds (Loan #...68803) into (BORROWER 10)'s bank account. (BORROWER 10) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

B. In furtherance of the scheme to defraud, MONTREAL HUDSON again knowingly and willfully falsified supporting documentation for (BORROWER 10)'s PPP loan application. On or about April 15, 2021, with the intent to defraud Fountainhead SBF, LLC, MONTREAL HUDSON assisted (BORROWER 10) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Fountainhead SBF, LLC, to approve (BORROWER 10)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$19,976 in PPP loan proceeds (Loan #...68909) into

(BORROWER 10)'s bank account. (BORROWER 10) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

19. ZIPORA HUDSON knew (BORROWER 11) through the preparation of (BORROWER 11)'s income taxes. ZIPORA HUDSON informed (BORROWER 11) that he/she qualified for a PPP loan, and that DEANDRE JONES and MONTREAL HUDSON assisted her clients in obtaining PPP loans. While in Zippy Bee Tax Service, (BORROWER 11) talked to DEANDRE JONES, who offered to assist (BORROWER 11) in obtaining a PPP loan.

A. In furtherance of the scheme to defraud, DEANDRE JONES knowingly and willfully falsified supporting documentation for (BORROWER 11)'s PPP loan application. On or about March 29, 2021, with the intent to defraud Fountainhead SBF, LLC, DEANDRE JONES assisted (BORROWER 11) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Fountainhead SBF, LLC, to approve (BORROWER 11)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #...48707) into (BORROWER 11)'s bank account. (BORROWER 11) then had a portion of the fraudulently obtained PPP funds, approximately \$5,000, paid to DEANDRE JONES.

B. In furtherance of the scheme to defraud, DEANDRE JONES again knowingly and willfully falsified supporting documentation for (BORROWER 11)'s PPP loan application. On or about April 12, 2021, with the intent to defraud Fountainhead SBF, LLC, DEANDRE JONES assisted (BORROWER 11) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Fountainhead SBF, LLC, to approve

(BORROWER 11)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$29,166 in PPP loan proceeds (Loan #....58806) into (BORROWER 11)'s bank account. (BORROWER 11) then had a portion of the fraudulently obtained PPP funds, approximately \$5,000, paid to DEANDRE JONES.

20. ZIPORA HUDSON knew (BORROWER 12) through the preparation of (BORROWER 12)'s income taxes. ZIPORA HUDSON informed (BORROWER 12) that he/she qualified for a PPP loan. Thereafter, ZIPORA HUDSON informed (BORROWER 12) that MONTREAL HUDSON would assist (BORROWER 12) in obtaining a PPP loan. Thereafter, MONTREAL HUDSON contacted (BORROWER 12) to assist him/her in obtaining a PPP loan.

A. In furtherance of the scheme to defraud, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 12)'s PPP loan application. On or about March 30, 2021, with the intent to defraud Fountainhead SBF, LLC, MONTREAL HUDSON assisted (BORROWER 12) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Fountainhead SBF, LLC, to approve (BORROWER 12)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #....78703) into (BORROWER 12)'s bank account. (BORROWER 12) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

B. In furtherance of the scheme to defraud, MONTREAL HUDSON again knowingly and willfully falsified supporting documentation for (BORROWER 12)'s PPP loan application. On or about April 14, 2021, with the intent to defraud Fountainhead SBF, LLC, MONTREAL HUDSON assisted (BORROWER 12) in filing the PPP loan

application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Fountainhead SBF, LLC, to approve (BORROWER 12)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #....28909) into (BORROWER 12)'s bank account. (BORROWER 12) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

21. ZIPORA HUDSON knew (BORROWER 13) through the preparation of (BORROWER 13)'s income taxes. ZIPORA HUDSON informed (BORROWER 13) that they could help him/her obtain a PPP loan and instructed (BORROWER 13) to contact MONTREAL HUDSON. Thereafter, (BORROWER 13) was contacted by MONTREAL HUDSON, who assisted (BORROWER 13) in obtaining a PPP loan.

A. In furtherance of the scheme to defraud, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 13)'s PPP loan application. On or about April 16, 2021, with the intent to defraud Benworth Capital Partners, LLC, MONTREAL HUDSON assisted (BORROWER 13) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Benworth Capital Partners, LLC, to approve (BORROWER 13)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #....28809) into (BORROWER 13)'s bank account. (BORROWER 13) then had a portion of the fraudulently obtained PPP funds, approximately \$2,000, paid to MONTREAL HUDSON.

All in violation of 18 U.S.C. § 1349.

**COUNT 2**  
**Wire Fraud**  
**[18 U.S.C. § 1343]**

22. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of paragraphs 1 – 21 of this Indictment.

23. (BORROWER 1) knew ZIPORA HUDSON prior to obtaining a PPP loan. (BORROWER 1) met with DEANDRE JONES and ZIPORA HUDSON concerning his/her PPP loan.

24. In furtherance of the scheme to defraud, and to obtain money by means of false and fraudulent pretenses, representations and promises, DEANDRE JONES knowingly and willfully falsified supporting documentation for (BORROWER 1)'s PPP loan application. Specifically, on or about April 23, 2021, with the intent to defraud Benworth Capital, DEANDRE JONES assisted (BORROWER 1) in filing the PPP loan application, which contained materially false and fraudulent representations made by DEANDRE JONES. The fraudulent application caused Benworth Capital Partners, LLC, to approve (BORROWER 1)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #....98901) into (BORROWER 1)'s bank account.

All in violation of 18 U.S.C. § 1343.

**COUNT 3**  
**Wire Fraud**  
**[18 U.S.C. § 1343]**

25. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of paragraphs 1 – 21 of this Indictment.

26. ZIPORA HUDSON knew (BORROWER 2) through the preparation of (BORROWER 2)'s income taxes. ZIPORA HUDSON informed (BORROWER 2) that he/she

qualified for a PPP loan. Thereafter, (BORROWER 2) was contacted by MONTREAL HUDSON, ZIPORA HUDSON's son, and told that MONTREAL HUDSON would assist (BORROWER 2) in obtaining a PPP loan.

27. In furtherance of the scheme to defraud, and to obtain money by means of false and fraudulent pretenses, representations and promises, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 2)'s PPP loan application. Specifically, on or about April 23, 2021, with the intent to defraud Benworth Capital Partners, LLC, MONTREAL HUDSON assisted (BORROWER 2) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Benworth Capital Partners, LLC to approve (BORROWER 2)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,377 in PPP loan proceeds (Loan #....18907) into (BORROWER 2)'s bank account. All in violation of 18 U.S.C. § 1343.

**COUNT 4**  
**Wire Fraud**  
**[18 U.S.C. § 1343]**

28. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of paragraphs 1 – 21 of this Indictment.

29. ZIPORA HUDSON knew (BORROWER 12) through the preparation of (BORROWER 12)'s income taxes. ZIPORA HUDSON informed (BORROWER 12) that he/she qualified for a PPP loan. Thereafter, ZIPORA HUDSON informed (BORROWER 12) that MONTREAL HUDSON would assist (BORROWER 12) in obtaining a PPP loan. Thereafter, MONTREAL HUDSON contacted (BORROWER 12) to assist him/her in obtaining a PPP loan.

30. In furtherance of the scheme to defraud, and to obtain money by means of false and fraudulent pretenses, representations and promises, MONTREAL HUDSON knowingly and willfully falsified supporting documentation for (BORROWER 12)'s PPP loan application. Specifically, on or about March 30, 2021, with the intent to defraud Fountainhead SBF, LLC, MONTREAL HUDSON assisted (BORROWER 12) in filing the PPP loan application, which contained materially false and fraudulent representations made by MONTREAL HUDSON. The fraudulent application caused Fountainhead SBF, LLC, to approve (BORROWER 12)'s PPP loan and to transmit, by means of a wire communication in interstate commerce, approximately \$20,833 in PPP loan proceeds (Loan #...78703) into (BORROWER 12)'s bank account.

All in violation of 18 U.S.C. § 1343.

**COUNT 5**  
**Conspiracy to Laundering of Monetary Instruments**  
**(18 U.S.C. §1956(h))**

31. The Allegations contained in paragraphs 1 through 21 of this Indictment are incorporated herein as though wholly set forth herein.

**The Conspiracy**

32. Beginning at a date unknown to the Grand Jury, but from on or about June of 2020, and continuing through December of 2021, in the Northern District of Mississippi, and elsewhere, the defendants ZIPORA HUDSON, MONTREAL HUDSON, and DEANDRE JONES, with others both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate and agree with each other and with other persons both known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: knowingly conducting and attempting to conduct financial transactions affecting interstate commerce involving the proceeds of specified unlawful

activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, and conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, with the intent to promote the carrying on of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, the Defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**Manner and Means to Accomplish the Conspiracy**

33. The charge of conspiracy was accomplished by the following means, among others and in the following manner:

A. The defendants devised a scheme to defraud financial institutions, in violation of 18 U.S.C. § 1343, in order to obtain PPP funds by means of false and fraudulent pretenses, representations and promises.

B. For the purpose of executing the scheme to defraud, the defendants falsified and fabricated supporting documentation required for PPP loan applications and assisted in the filing materially false and fraudulent PPP applications and agreements.

C. For the purpose of executing the scheme to defraud, ZIPORA HUDSON used her position at the Zippy Bee's Tax Service to assist individual borrowers in filing false and fraudulent PPP applications and agreements. MONTREAL HUDSON and DEANDRE JONES also assisted other borrowers in filing false and fraudulent PPP applications and agreements.

D. For the purpose of executing the scheme to defraud, ZIPORA HUDSON referred borrowers to MONTREAL HUDSON and DEANDRE JONES in order for

MONTREAL HUDSON and DEANDRE JONES to assist said borrowers in filing false and fraudulent PPP applications and agreements.

E. The materially false and fraudulent PPP applications induced the financial institutions to make the PPP loans and caused the financial institutions to transmit the loan proceeds, by means of a wire communication in interstate commerce, to the borrower bank accounts.

F. The borrowers in turn paid a portion of the fraudulently obtained PPP funds to the defendants.

All in violation of Title 18, U.S.C. § 1956(h).

**COUNT 6**  
**Money Laundering**  
**[18 U.S.C. §§ 1956(a)(1)(A)(1) and 2]**

34. The Allegations contained in paragraphs 1 through 21 and paragraphs 31 through 33 of this Indictment are incorporated herein as though wholly set forth herein.

35. The term “conducts” includes the initiating, the concluding, or participating in initiating or concluding a transaction.

36. On or about April 29, 2021, in the Northern District of Mississippi, defendants ZIPORA HUDSON and DEANDRE JONES, being aided and abetted, each by the other, and by persons known and unknown to the grand jury, did knowingly conduct a financial transaction affecting interstate commerce, to wit, the transfer of approximately \$4,000 in United States currency from (BORROWER 1)’s bank account, which involved the proceeds of a specified unlawful activity, that is, wire fraud, with the intent to promote the carrying on of said specified activity, and that while conducting such financial transaction, the defendants knew that the

property involved in the financial transaction represented the proceeds of wire fraud, all in violation of 18 U.S.C. §§ 1956(a)(1)(A)(1) and 2.

**COUNT 7**  
**Money Laundering**  
**[18 U.S.C. §§ 1956(a)(1)(A)(1) and 2]**

37. The Allegations contained in paragraphs 1 through 21 and paragraphs 31 through 33 of this Indictment are incorporated herein as though wholly set forth herein.

38. The term “conducts” includes the initiating, the concluding, or participating in initiating or concluding a transaction.

39. On or about May 3, 2021, in the Northern District of Mississippi, defendants ZIPORA HUDSON and MONTREAL HUDSON, being aided and abetted, each by the other, and by persons known and unknown to the grand jury, did knowingly conduct a financial transaction affecting interstate commerce, to wit, the transfer of approximately \$2,000 in United States currency from (BORROWER 12)’s bank account, which involved the proceeds of a specified unlawful activity, that is, wire fraud, with the intent to promote the carrying on of said specified activity, and that while conducting such financial transaction, the defendants knew that the property involved in the financial transaction represented the proceeds of wire fraud, all in violation of 18 U.S.C. §§ 1956(a)(1)(A)(1) and 2.

**WIRE FRAUD FORFEITURE NOTICE**  
**(18 U.S.C. § 982(a)(2)(A))**

40. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1343 and 1349, set forth in Counts 1 through 4, the defendants, ZIPORA HUDSON, MONTREAL HUDSON, and DEANDRE JONES shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds they obtained directly or indirectly, as result of such violations.

41. If any of the property determined as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(2)(A), 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 intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property to be forfeited.

All pursuant to Title 18, United States Code, Section 982 (a)(2)(A), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

  
\_\_\_\_\_  
CLAY JOYNER  
UNITED STATES ATTORNEY

*/s/ Redacted Signature*  
\_\_\_\_\_  
FOREPERSON