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14 Attorneys for Plaintiff
 UNITED STATES OF AMERICA

15 UNITED STATES DISTRICT COURT

16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,
 18 Plaintiff,
 19 v.
 20 OUMAR SISSOKO,
 21 Defendant.

No. CR 21-187-JFW

FIRST AMENDED AGREED-UPON SUMMARY
 OF THE INDICTMENT

Trial Date: March 22, 2022

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 24 Plaintiff United States of America, by and through its counsel
 25 of record, Assistant United States Attorney Carolyn S. Small and
 26 Trial Attorney Jason Covert, and defendant OUMAR SISSOKO, by and
 27 through his counsel of record, Deputy Federal Public Defenders Elena
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1 Sadowsky and Christy O'Connor, hereby file this First Amended Joint
2 Agreed-Upon Summary of the Indictment.

3 Dated: March 14, 2022

Respectfully submitted,

4 TRACY L. WILKISON
United States Attorney

5 JOSEPH S. BEEMSTERBOER
6 Acting Chief, Fraud Section

7 SCOTT M. GARRINGER
8 Assistant United States Attorney
Chief, Criminal Division

9 /s/

10 CAROLYN S. SMALL
Assistant United States Attorney

11 JASON COVERT
12 Trial Attorney

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA

15
16 Dated: March 14, 2022

/s/ (via email authorization)

17 ELENA SADOWSKY
CHRISTY O'CONNOR
18 Deputy Federal Public Defenders

19 Attorneys for Defendant
20 OUMAR SISSOKO
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AGREED-UPON SUMMARY OF INDICTMENT

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2 This case involves a four-count criminal indictment against
3 defendant Oumar Sissoko. Each count charges the defendant with wire
4 fraud. The government alleges in the indictment that the defendant
5 engaged in a scheme to defraud the United States Small Business
6 Administration and JPMorgan Chase Bank by misappropriating, with the
7 intent to defraud, Paycheck Protection Program loan funds that the
8 defendant obtained for his company, Road Doctor California LLC.

9 Specifically, the government alleges that defendant obtained a
10 Paycheck Protection Program loan from JPMorgan Chase in the amount
11 of \$7.25 million by stating that Road Doctor California LLC was in
12 the process of hiring 450 full-time employees, would have average
13 monthly payroll expenses of \$2.9 million for these employees, and
14 would only use Paycheck Protection Program loan proceeds for
15 approved expenses. The government alleges that, under the terms of
16 the loan and the Paycheck Protection Program, the defendant was
17 required to spend the loan funds only on certain approved expenses,
18 like payroll costs, mortgage interest payments, lease payments, and
19 utility payments. The government alleges that instead of using the
20 Paycheck Protection Program loan proceeds on these approved
21 expenses, the defendant misappropriated, with the intent to defraud
22 the Small Business Administration and JPMorgan Chase Bank, hundreds
23 of thousands of dollars of the loan funds to use for impermissible
24 purposes, including to purchase a luxury car for more than \$100,000,
25 to pay off the balance of the loan on a different luxury car that
26 the defendant had previously acquired, and to purchase a computer
27 for almost \$6,000.

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1 The government further alleges that the defendant caused the
2 transmission of interstate wire communications in connection with
3 the alleged scheme.

4 The defendant has pleaded not guilty to all charges.

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