

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
HARRISON DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 3:21-CR-30002-001
	)	
CRYSTAL PAYNE	)	18 U.S.C. § 1001(a)(3)

**INFORMATION**

The First Assistant United States Attorney charges:

**COUNT ONE**

On or about July 16, 2020, in the Western District of Arkansas, Harrison Division, the defendant, **CRYSTAL PAYNE**, did willfully and knowingly make and use a false writing and document, knowing it to contain a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Small Business Administration (SBA), a federal agency, by submitting an application for a loan under the SBA’s Paycheck Protection Program to Seattle Bank, in which she swore that she was the sole owner of a loan-eligible business, to wit: B Bird Stitching, with a monthly payroll obligation of \$53,642.00 well knowing and believing that B Bird Stitching had no such payroll obligation.

All in violation of Title 18, United States Code, Section 1001(a)(3).

DAVID CLAY FOWLKES  
FIRST ASSISTANT UNITED STATES ATTORNEY



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