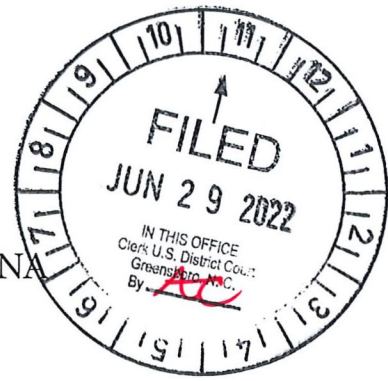


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :
 :
 v. : 1:22CR.200 -1
 :
 SAMUEL ALLEN MOUZON :

The United States Attorney charges:

Background

1. At all times material to this Information:
 - a. Victim Company was a manufacturing company located in High Point, North Carolina.
 - b. SAMUEL ALLEN MOUZON worked for Victim Company. His title was Chief Financial Officer (“CFO”).
 - c. Branch Banking and Trust Company (“BB&T”) was a federally insured financial institution headquartered in Winston-Salem, North Carolina. In or about December 2019, BB&T merged with another financial institution to become Truist Financial Corporation (“Truist Bank”), which is headquartered in Charlotte, North Carolina.
 - d. Pinnacle Financial Partners (“Pinnacle”) was a federally insured financial institution headquartered in Nashville, Tennessee.

Pinnacle's servers, which facilitated the payments involving Pinnacle described in this Indictment, were located in the state of Tennessee.

e. Victim Company maintained an operating account at Pinnacle ("Pinnacle"), account ending in x0400 (the "Pinnacle Account"). Victim Company used that account to support its daily business operating needs.

f. During all times relevant to this Information, MOUZON was an authorized signatory on the Pinnacle Account.

g. Victim Company also maintained an account at BB&T, account ending in x2777 (the "BB&T Account").

h. From in or about February 2017 until in and about August 2021, MOUZON was the sole authorized signatory on the BB&T Account.

i. Victim Company received a Paycheck Protection Program ("PPP") loan. PPP loans were made available as part of the Coronavirus Aid, Relief, and Economic Security ("CARES") Act that was enacted into federal law in March 2020. The purpose of the PPP loan program was to help small businesses meet their payroll and certain other limited short-term expenses.

The Fraudulent Scheme

2. From in or about August 2017, continuing up to and including in or about February 2021, the exact dates unknown, in the County of Guilford, in the Middle District of North Carolina, SAMUEL ALLEN MOUZON, devised

and intended to devise a scheme to defraud Victim Company by means of materially false and fraudulent pretenses, representations, and promises.

3. It was a part of the scheme that SAMUEL ALLEN MOUZON used his position as CFO and sole signatory on the BB&T Account, to embezzle Victim Company money for his personal benefit and expenses and without Victim Company's authorization or knowledge.

4. It was further a part of the scheme that SAMUEL ALLEN MOUZON caused approximately \$2,175,538.86 of Victim Company's funds to be deposited into the BB&T Account—the account over which he was the sole signatory. The purpose of the transfers was so that MOUZON could then use the funds for his personal benefit without the knowledge of Victim Company's other managers, employees, and stakeholders.

5. MOUZON caused or facilitated the transfer of the funds through three methods: (1) MOUZON caused third-party checks payable to Victim Company to be deposited into the BB&T Account rather than the Pinnacle Account, which was the Victim Company's operating account; (2) MOUZON caused funds to be moved by wire transfer from the Pinnacle Account to the BB&T Account; and (3) after Victim Company received a PPP loan, MOUZON caused checks totaling \$725,000 to be drawn on the Pinnacle Account and deposited to the BB&T Account.

6. It was further a part of the scheme that SAMUEL ALLEN MOUZON wrote checks totaling approximately \$130,781 from the BB&T Account and deposited the checks in his personal checking account.

7. It was further a part of the scheme that SAMUEL ALLEN MOUZON wrote checks totaling approximately \$301,854 from the BB&T Account to pay various personal credit card accounts.

8. It was further a part of the scheme that SAMUEL ALLEN MOUZON wrote checks from the BB&T Account totaling approximately \$194,043 and used those checks to pay off installment loans MOUZON and others had taken out with various creditors to fund personal purchases, including purchases of cars and boats.

9. It was further a part of the scheme that SAMUEL ALLEN MOUZON wrote checks on the BB&T Account totaling approximately \$1,411,606 and used those checks to pay off advances MOUZON took on a personal line of credit.

10. During the course of the scheme, SAMUEL ALLEN MOUZON used \$2,038,284.66 of Victim Company's funds for his personal benefit and expenses and without Victim Company's authorization or knowledge.

Execution

11. On or about February 10, 2021, in the Middle District of North Carolina, defendant, SAMUEL ALLEN MOUZON, having knowingly devised

and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, pictures, and sounds, namely, wire transfer of \$76,198.74 from the Pinnacle Account to the BB&T Account.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

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

2. Upon conviction of Count One of the Information herein, the defendant, SAMUEL ALLEN MOUZON, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to or obtained directly or indirectly as a result of such offense, or a conspiracy to commit such offense.

3. The property to be forfeited may include, but is not limited to, a money judgment, in an amount to be determined, representing the value of the property subject to forfeiture as a result of such offense.

4. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant cannot be located upon the exercise of due diligence, has been transferred or sold to or deposited with a third person, has been placed beyond the jurisdiction of the Court, has been substantially diminished in value, or 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 said defendant up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: June 29, 2022

SANDRA J. HAIRSTON
United States Attorney



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