


1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney

FILED
Sep 24 2020
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO



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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,) CASE NO. CR 20-0361 CRB
12 Plaintiff,)
13 v.) VIOLATION: 18 U.S.C. §§ 1343, 2(a)
14 SARA SOARES REYNOLDS,)
15 Defendant.) SAN FRANCISCO VENUE
16 _____) 

17 INFORMATION

18 The United States Attorney charges:

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20 COUNT ONE: (18 U.S.C. §§ 1343, 2(a) – Wire Fraud, Aiding and Abetting)

21 Beginning in or about August 2019 and continuing through in or about December 2019, in the
22 Northern District of California and elsewhere, the defendant,
23 SARA SOARES REYNOLDS,
24 did knowingly aid and abet Geoffrey Mark PALERMO and others, known and unknown to the United
25 States Attorney, in the commission of wire fraud, to wit, a scheme and artifice to defraud ReadyCap
26 Lending LLC, an SBA preferred lender, as to a material matter and to obtain money and property, to wit,
27 approximately \$5,000,000 in loans for GMP Cars LLC, by means of materially false and fraudulent
28 pretenses, representations, and promises, and by omission and concealment of material facts, and, for the

1 purpose of executing such scheme or artifice and attempting to do so, did transmit, and cause to be
2 transmitted, by means of wire communication in interstate and foreign commerce, certain writings,
3 signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

4 All in violation of Title 18, United States Code, Section 2(a).

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6 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

7 The allegations contained in this Information are re-alleged and incorporated by reference for the
8 purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title
9 28, United States Code, Section 2461(c).

10 Upon conviction for the offense set forth in this Information, the defendant,

11 SARA SOARES REYNOLDS,

12 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
13 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived
14 from proceeds the defendant obtained directly and indirectly, as the result of those violations.

15 If any of the property described above, as a result of any act or omission of the defendant:

- 16 a. cannot be located upon exercise of due diligence;
17 b. has been transferred or sold to, or deposited with, a third party;
18 c. has been placed beyond the jurisdiction of the court;
19 d. has been substantially diminished in value; or
20 e. has been commingled with other property which cannot be divided without difficulty,

21 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
22 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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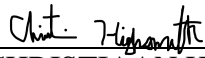
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1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,
2 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

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4 DATED: September 23, 2020

DAVID L. ANDERSON
United States Attorney

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CHRISTIAAN H. HIGHSMITH
Assistant United States Attorney
ALEXANDRA SHEPARD
Special Assistant United States Attorney