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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVEN R. GOLDSTEIN,

Defendant.

No. 2:20-cr-00597-SB

I N F O R M A T I O N

[18 U.S.C. § 1040(a)(2): Fraud in Connection with Major Disaster and Emergency Benefits; 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c): Criminal Forfeiture]

The United States Attorney charges:

[18 U.S.C. §§ 1040(a)(2), 2(b)]

On or about May 2, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant STEVEN R. GOLDSTEIN knowingly made, and willfully caused to be made, materially false statements, and made and used, and willfully caused to be made and used, false writings and documents, knowing those writings and documents to contain materially false and fraudulent statements, to Bank of America, N.A. when applying for a \$355,000 loan under the Paycheck Protection Program, in a matter involving a benefit authorized, transported, transmitted, transferred, disbursed, and paid in connection with an emergency declaration under Section 501 of

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1 the Robert T. Stafford Disaster Relief and Emergency Assistance Act
2 (42 U.S.C. § 5191), in and affecting interstate and foreign commerce.

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FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offense set forth in the sole count of this Information.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

a. All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offense; and

b. To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been


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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3 NICOLA T. HANNA
4 United States Attorney

5 
6 Scott M. Garringer
7 Deputy Chief, Criminal Division For:

8 BRANDON D. FOX
9 Assistant United States Attorney
10 Chief, Criminal Division

11 BENJAMIN R. BARRON
12 Assistant United States Attorney
13 Chief, Santa Ana Branch Office

14 DANIEL H. AHN
15 Assistant United States Attorney
16 Deputy Chief, Santa Ana Branch
17 Office

18 CHARLES E. PELL
19 Assistant United States Attorney
20 Santa Ana Branch Office