



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-80103-CR-CANNON

UNITED STATES OF AMERICA

v.

DUSTIN SEAN McCABE,

Defendant.

/

TRIAL STIPULATIONS

COMES NOW, THE UNITED STATES OF AMERICA, by and through the undersigned Assistant United States Attorney, and the Defendant, DUSTIN SEAN McCABE, personally and through his attorney, stipulate and agree to the following facts, which the jury must accept as having been proved beyond a reasonable doubt:

1. The Internal Revenue Service ("IRS") Form Schedule C, "Statement of Profit or Loss From Business" tax document for the tax year 2019, which the Defendant submitted to Celtic Bank in connection with a Paycheck Protection Program ("PPP") application in May 2020 and which is marked and admitted as the United States' Exhibit GX121, was never filed with the IRS.

[Remainder of Page Intentionally Left Blank]

2. The IRS Form 1120, "U.S. Corporation Income Tax Return" tax document for the tax year 2020, which the Defendant submitted to Cross River Bank in connection with a PPP application in February 2021 and which is marked and admitted as the United States' Exhibit GX93, was never filed with the IRS.

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

Date: 2-27-25

By:



ZACHARY A. KELLER
ASSISTANT UNITED STATES ATTORNEY

Date: 2-27-25

By:



TERRENCE O'SULLIVAN
ATTORNEY FOR DEFENDANT

Date: 27 Feb 2025

By:



DUSTIN SEAN McCABE
DEFENDANT