PHILLIP A. TALBERT
United States Attorney
JEFFREY A. SPIVAK
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. GURJEET BATH, Defendant.	CASE NO. 1:24-cr-00198-JLT-SKO 18 U.S.C. § 641 – Theft of Government Property; and 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

I N F O R M A T I O N

COUNT ONE: [18 U.S.C. § 641– Theft of Government Property]

The United States Attorney charges: T H A T

GURJEET BATH,

defendant herein, as follows:

1. At all relevant times, Defendant Gurjeet Bath operated, himself and with family members, two trucking businesses: G.S. Bath, Inc. and Complete Transportation Solutions (CTS), operating in Fresno County in the State and Eastern District of California.

2. In/around April 20, 2020, Bath caused G.S. Bath, Inc. to apply for and receive a COVID-19 Paycheck Protection Program ("PPP") loan for approximately $366,000 from the United States Small Business Administration ("SBA"). Then, in and around March 10, 2021, Bath caused G.S. Bath, Inc. to apply for and receive a PPP loan for approximately $475,000 from the SBA.

3. For the two G.S. Bath, Inc. PPP loans, Bath falsified records he provided to the SBA to misrepresent and inflate the number of employees G.S. Bath, Inc. had, and to misrepresent and inflate and the gross wages paid by G.S. Bath, Inc. Bath knew these representations were false at the time he made them to the SBA. Based on Bath's material misrepresentations, G.S. Bath, Inc.'s PPP loans were approved and the SBA transferred to Bath and his family members approximately $366,000 and approximately $475,000 which were received and deposited into bank accounts in Fresno County, State and Eastern District of California.

4. In/around May 7, 2020, Bath caused CTS to apply for and receive a PPP loan for approximately $198,000 from the SBA. To obtain the loan, Bath knowingly falsified records to misrepresent the number of CTS employees and names of those employees, and misrepresent that CTS paid gross wages to those employees. Bath then submitted those falsified records to the SBA.

5. Based on Bath's material misrepresentations, CTS's PPP loan was approved and the SBA transferred to Bath approximately $198,000 which were received and deposited into bank accounts in Fresno County, State and Eastern District of California.

6. Accordingly, between in or around April 20, 2020 and in or around March 10, 2021, Bath knowingly stole over $1,000 in funds belonging to the United States, or a department or agency thereof, with the intention of depriving the United States of the use or benefit of the money, in violation of 18 U.S.C. § 641.

<u>FORFEITURE ALLEGATION</u>: [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Upon conviction of the offenses alleged in Count One of this Information, defendant GURJEET BATH shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real or personal, which constitutes or is derived from proceeds traceable to such violation, including, but not limited to, the following:

a. Real property located at 2745 S. Peach Avenue, Fresno, California, Fresno County, APN: 316-040-34,

b. Real property located at 18670 S. Elm Avenue, Laton, California, Fresno County, APNs: 055-310-15 and 055-021-18, and

c. A sum of money equal to the amount of proceeds traceable to such offenses, for which defendant is convicted.

If any property subject to forfeiture, as a result of the offenses alleged in Count One of this Information, for which defendant is convicted:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

Dated: 8/15/2024

PHILLIP A. TALBERT
United States Attorney

By: ______________________
JEFFREY A. SPIVAK
Assistant United States Attorney

United States v. Bath
Penalties for Information

COUNT 1:

VIOLATION: 18 U.S.C. § 641 – Theft of Government Property

PENALTIES: A maximum of up to 10 years in prison; or
Fine of up to $250,000; or both fine and imprisonment
Supervised release of up to 3 years

SPECIAL ASSESSMENT: $100 (mandatory on each count)