IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CRIMINAL NO. RDB-25-270**
	*	
EDWARD MCCORKLE,	*	
	*	
Defendant	*	
	*	
	*******	

UNITED STATES' MOTION FOR PRELIMINARY ORDER OF FORFEITURE

The United States of America, by its undersigned attorneys, respectfully moves this Court for the issuance of a Preliminary Order of Forfeiture in the above-captioned case pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2(b) of the Federal Rules of Criminal Procedure. A proposed Preliminary Order of Forfeiture is submitted herewith. In support thereof, the United States sets forth the following:

1. On September 9, 2025, the United States of America filed an Information, charging Edward McCorkle (the "Defendant") with Wire Fraud Conspiracy, in violation of 18 U.S.C. § 1349 (Count One). Dkt. No. 1.

2. The Information also included a forfeiture allegation which provided notice that the United States intended to seek forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of the Defendant of the offense alleged in Count One of the Information. *Id*. at 6.

3. On September 15, 2025, the Defendant pled guilty to the offense alleged in Count One of the Information. Dkt. No. 13. As part of his guilty plea, the Defendant agreed to entry of an order of forfeiture to include a money judgment in the amount of at least **$523,700.00** in U.S. currency equal to the value of the property derived from, or otherwise involved in, the Defendant's

offense. *Id.* ¶ 12.

4. In support of his guilty plea, the Defendant executed a Stipulation of Facts in which the Defendant admitted that from approximately May 2020 through February 2021, the Defendant and his co-conspirators engaged in a scheme to defraud a financial institution, Cross River Bank, and the United States Small Business Administration to obtain fraudulent loan for various purported businesses owned by the Defendant, under the Paycheck Protection Program which was part of the Coronavirus Aid, Relief, and Economic Security Act and the Economic Injury Disaster Loan program. Dkt. No. 13-1. Ultimately, the Defendant fraudulently obtained **$523,700.00** as part of this scheme. *Id.*

5. Pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2(b)(2) of the Federal Rules of Criminal Procedure, the United States is now entitled to a forfeiture money judgment in the amount of **$523,700.00** in U.S. currency against the Defendant.

6. Further, the United States may move at any time, pursuant to Rule 32.2(e)(1)(B) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(p), to forfeit any property of the defendant up to the value of the forfeiture money judgment included in the Preliminary Order of Forfeiture. Upon issuance of any order forfeiting specific property, the United States will publish notice in accordance with 21 U.S.C. § 853(n)(1) and Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure.

7. The United States also seeks permission to conduct any discovery that might be necessary to identify, locate, or dispose of forfeited property, pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(m).

WHEREFORE, the United States requests that this Court:

(a) enter the Preliminary Order of Forfeiture in the form submitted herewith;

(b) include the forfeiture, as set forth in the Preliminary Order of Forfeiture, in the oral pronouncement of the Defendant's sentence;

(c) retain jurisdiction for the purpose of enforcing the forfeiture; and

(d) incorporate the Preliminary Order of Forfeiture in the criminal judgment entered against the Defendant, pursuant to Federal Rule of Criminal Procedure 32.2(b)(4).

Respectfully submitted,

Kelly O. Hayes
United States Attorney

By: /s/
Paul E. Budlow
Assistant United States Attorney