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FILED
SEP 08 2020
Mark C. McCartt, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,	)	**Case No.** 20-CR-148-JED-1
	)	
Plaintiff,	)	**AMENDED INFORMATION**
	)	**[18 U.S.C. § 1014 – False Statement to**
v.	)	**a Financial Institution;**
	)	**Forfeiture Allegation: 18 U.S.C. §**
ADEWALE MATTHEW ABEL,	)	**982(a)(2) – Fraud and False Statement**
	)	**Forfeiture]**
Defendant.	)	

THE UNITED STATES ATTORNEY CHARGES:

1. From on or about May 3, 2020, to on or about May 11, 2020, in the Northern District of Oklahoma, the defendant, **ADEWALE MATTHEW ABEL**, made false statements and reports for the purpose of influencing in any way the action of a financial institution, Stride Bank, upon an application and loan, in the following manner:

2. For the purpose of securing a loan in the approximate amount of $300,000 for a company, Pinnacle Industry LLC ("Pinnacle"), that **ABEL** claimed to own and operate, pursuant to the Payment Protection Program ("PPP") administered by the United States Small Business Administration, **ABEL** knowingly and intentionally:

a. falsely represented in a PPP "Borrower Application Form" that he submitted to Stride Bank that Pinnacle:

a. Had an average monthly payroll of $120,000;

b. Had 20 employees;

c. Was in operation on February 15, 2020, and had employees for whom it paid salaries and payroll taxes; and

d. Would use the loan funds to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments, as specified under the Paycheck Protection Program Rule;

b. falsely certified in the PPP "Borrower Application Form" that he submitted to Stride Bank that the information provided in the application and supporting documents was true and accurate in all material respects; and

c. submitted to Stride Bank, as a supporting document for the PPP "Borrower Application Form," a false "Payroll Summary Report for Pinnacle Industry LLC / July 2019 to March 2020."

3. The accounts of Stride Bank were then insured by the Federal Deposit Insurance Corporation.

All in violation of Title 18, United States Code, Section 1014.

FORFEITURE ALLEGATION
[18 U.S.C. § 982(a)(2)]

The allegations contained in this Amended Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2).

Upon conviction of the offense alleged in this Amended Information, as a part of his sentence, the defendant, **ADEWALE MATTHEW ABEL**, shall forfeit to the United States, any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to:

MONEY JUDGMENT

A money judgment in an amount of at least $300,000.00, representing proceeds obtained by the Defendant as a result of the offenses;

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 982(a)(2).

Respectfully submitted,

R. TRENT SHORES
UNITED STATES ATTORNEY

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