

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

**CASE NOs. 23-CR-80068-AHS(s)
24-CR-60004-AHS**

UNITED STATES OF AMERICA

vs.

KAREEM MEMON,

Defendant.

/

JOINT STIPULATION REGARDING RESTITUTION

The United States of America and the defendant, Kareem Memon, by and through undersigned counsel, hereby file this joint stipulation to the entry of an order requiring the defendant to pay restitution in the amount of eleven million three hundred eighty-four thousand and one (\$11,384,001) in U.S. currency in connection with Case No: 24-CR-60004-AHS; and three hundred ninety-eight thousand, five hundred and sixty-two dollars and sixty-two cents (\$398,562.62) in U.S. currency in connection with Case No: 23-CR-80068-AHS(s), for an aggregate total amount of \$11,782,563.62. An order of restitution is mandatory under 18 U.S.C. § 3663A, in both cases.

The government shall provide the U.S. Probation Office with a list of the victims, their contact information, and the amount of restitution due (the "Victim List"). Thereafter, the U.S. Probation Office will provide the Victim List to the Court by separate memorandum.

24-CR-60004-AHS

The parties recommend that the Judgment of Conviction in Case No. 24-CR-60004-AHS (ECF No. 42) be amended to include the following standard language used in this district:

It is further ordered that the defendant shall pay restitution in the amount of \$11,384,001. Defendant is jointly and severally liable for the restitution along with his co-conspirators in the charged scheme, however, the Defendant's obligation to pay restitution does not terminate until after the victims are made whole or the Defendant pays the restitution. During the period of incarceration, payment shall be made as follows: (1) if the defendant earns wages in a Federal Prison Industries (UNICOR) job, then the defendant must pay 50% of wages earned toward the financial obligations imposed by this Judgment in a Criminal Case; (2) if the defendant does not work in a UNICOR job, then the defendant must pay \$25.00 per quarter toward the financial obligations imposed in this order.

Upon release of incarceration, the defendant shall pay restitution at the rate of 10% of monthly gross earnings, until such time as the court may alter that payment schedule in the interests of justice. The U.S. Bureau of Prisons, U.S. Probation Office and U.S. Attorney's Office shall monitor the payment of restitution and report to the court any material change in the defendant's ability to pay. These payments do not preclude the government from using other assets or income of the defendant to satisfy the restitution obligations.

The restitution shall be made payable to the Clerk, United States Courts, and is to be addressed to:

U.S. CLERK'S OFFICE
ATTN: FINANCIAL SECTION
400 N MIAMI AVENUE, ROOM 08N09
MIAMI, FL 33128-7716

23-CR-80068-AHS(s)

The parties recommend that the Judgment of Conviction in Case No. 23-CR-80068-AHS(s) (ECF No. 74) be amended to include the following standard language used in this district:

It is further ordered that the defendant shall pay restitution in the amount of \$398,562.62. Defendant is liable for the restitution in the charged scheme. The Defendant's obligation to pay restitution does not terminate until after the victims are made whole or the Defendant pays the restitution. During the period of incarceration, payment shall be made as follows: (1) if the defendant earns wages in a Federal Prison Industries (UNICOR) job, then the defendant must pay 50% of wages earned toward the financial obligations imposed by this Judgment in a Criminal Case; (2) if the defendant does not work in a UNICOR job, then the defendant must pay \$25.00 per quarter toward the financial obligations imposed in this order.

Upon release of incarceration, the defendant shall pay restitution at the rate of 10% of monthly gross earnings, until such time as the court may alter that payment

schedule in the interests of justice. The U.S. Bureau of Prisons, U.S. Probation Office and U.S. Attorney's Office shall monitor the payment of restitution and report to the court any material change in the defendant's ability to pay. These payments do not preclude the government from using other assets or income of the defendant to satisfy the restitution obligations.

The restitution shall be made payable to the Clerk, United States Courts, and is to be addressed to:

U.S. CLERK'S OFFICE
ATTN: FINANCIAL SECTION
400 N MIAMI AVENUE, ROOM 08N09
MIAMI, FL 33128-7716

WHEREFORE, the parties respectfully request that the Court amend the Judgment and Conviction in Case No: 24-CR-60004-AHS (ECF No. 42) to set restitution in the amount of \$11,384,001; and in Case No: 23-CR-80068-AHS(s) (ECF No. 74) to set restitution in the amount of \$398,562.62, and order payments to be made to the victims set forth in the Victim List that shall be provided to the Court by the U.S. Probation Office.

Respectfully submitted,

MARKENZY LAPOINTE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 26, 2024, I electronically filed the foregoing document with the Clerk of Court via the CM/ECF system.

/s/ Robin W. Waugh
Robin W. Waugh