

FILED

DEC 16 2020

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

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

20 CR 334 CVE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
RAFAEL MATURINO,)
)
Defendant.)

Case No. _____
INFORMATION
[18 U.S.C. § 1344: Bank Fraud;
Forfeiture Allegation: 18 U.S.C.
§ 981(a)(1)(C) and 28 U.S.C. § 2461 –
Bank Fraud Forfeiture]

THE UNITED STATES ATTORNEY CHARGES:

On or about April 28, 2020, in the Northern District of Oklahoma, the defendant **RAFAEL MATURINO** (“**MATURINO**”), executed, and attempted to execute, a scheme and artifice to defraud First Bank of Owasso, a financial institution, the depository accounts of which were insured by the Federal Deposit Insurance Corporation, and to obtain money and property from First Bank of Owasso by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made (“the Scheme”). As part of the Scheme, **MATURINO** applied for a Paycheck Protection Program (PPP) loan on behalf of a company he claimed to own and operate, Maturino Enterprises, Inc. In connection with that application, **MATURINO** submitted forms that materially misrepresented the payroll expenditures of Maturino Enterprises, Inc., as well as the amount of taxes Maturino Enterprises, Inc., paid and the number of people Maturino Enterprises, Inc., employed.

All in violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATION
[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461]

The allegations contained in this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

Upon conviction of the bank fraud scheme alleged in this Information, as part of his sentence, the defendant, **RAFAEL MATURINO**, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the scheme. A criminal forfeiture money judgment shall also be entered in a sum of money in an amount of at least \$97,800, representing proceeds obtained as a result of such scheme.

Pursuant to Title 21, United States Code, Section 853(p), as adopted by Title 18, United States Code, Section 982(b), 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.

R. TRENT SHORES
UNITED STATES ATTORNEY



VICTOR A.S. REGAL
Assistant United States Attorney