

1 STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,) CASE NO. 21-CR-00143-CRB
12 Plaintiff,)
13 v.) VIOLATIONS: 18 U.S.C. § 1014 – False Statement
14 CAESAR OSKAN,) to Financial Institution; 18 U.S.C. § 982 – Forfeiture
15 a/k/a Sezer Ozkan) Allegation
16 Defendant.)
17) SAN FRANCISCO

18 SUPERSEDING INFORMATION

19 The United States Attorney charges:

20 COUNT ONE: (18 U.S.C. § 1014 – False Statement to Financial Institution)

21 On or about June 1, 2020, in the Northern District of California, the defendant

22 CAESAR OSKAN

23 a/k/a Sezer Ozkan

24 knowingly engaged in a scheme to make false statements for the purpose of influencing the actions of
25 Financial Institution A, which was a financial institution insured by the Federal Deposit Insurance
26 Corporation, in connection with his application for a Paycheck Protection Program loan, to wit, OSKAN
27 knowingly made what he knew were false statements and representations to Financial Institution A on
28

1 his Borrower Application Form and in supporting documents for a \$268,719.00 loan under the Paycheck
2 Protection Program regarding the number of employees OSKAN's business, CTC Trade LLC,
3 employed, whether CTC Trade LLC was in operation as of February 15, 2020, the amount of CTC
4 Trade LLC's monthly payroll, the date of CTC Trade LLC's incorporation, the tax filing history for
5 CTC Trade LLC, and the intended use of the loan proceeds, all in violation of Title 18, United States
6 Code, Section 1014.

7 FORFEITURE ALLEGATION: (18 U.S.C. § 982 – Forfeiture)

8 The factual allegations contained in Count One of this Information are realleged and by this
9 reference fully incorporated herein for the purpose of alleging forfeiture, pursuant to the provisions of
10 Title 18, United States Code, Section 982(a)(2)(B).

11 Upon a conviction of the offense alleged in Count One, the defendant,

12 CAESAR OSKAN

13 a/k/a Sezer Ozkan,

14 shall forfeit to the United States all right, title, and interest in any property constituting or derived from
15 any proceeds the defendant obtained, directly or indirectly, as a result of said violation.

16 If, as a result of any act or omission of the defendant, any of said property

- 17 a. cannot be located upon the exercise of due diligence;
- 18 b. has been transferred or sold to or deposited with, a third person;
- 19 c. has been placed beyond the jurisdiction of the Court;
- 20 d. has been substantially diminished in value; or
- 21 e. has been commingled with other property which cannot be divided without
22 difficulty;

23 any and all interest the defendant has in any other property (not to exceed the value of the above
24 forfeitable property) shall be vested in the United States and forfeited to the United States.

25 All in violation of Title 18, United States Code, Section 982(a)(2)(B), and pursuant to the rules and
26 procedures set forth in Title 21, United States Code, Section 853, and Rule 32.2 of the Federal Rules of
27 Criminal Procedure.

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DATED: May 4, 2021

STEPHANIE M. HINDS
Acting United States Attorney

/s/ Maya Karwande
MAYA KARWANDE
Assistant United States Attorney

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 1014 - False Statement to Financial Institution Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Maximum Penalties: 30 years' imprisonment, 3 years' supervised release, \$1,000,000 fine, \$100 special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

▶ CAESAR OSKAN A/K/A SEZER OZKAN

DISTRICT COURT NUMBER

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

USAO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. ATTORNEY DEFENSE } SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant } MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under }

Name and Office of Person Furnishing Information on this form Stephanie M. Hinds

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Maya Karwande

DEFENDANT

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
1) If not detained give date any prior summons was served on above charges ▶ n/a
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
5) On another conviction } Federal State
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST ▶ Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CRIMINAL COVER SHEET

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. CAESAR OSKAN

CASE NUMBER:

CR 21-CR-00143-CRB

Is This Case Under Seal?

Yes No

Total Number of Defendants:

1 2-7 8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes No

Venue (Per Crim. L.R. 18-1):

SF OAK SJ

Is this a potential high-cost case?

Yes No

Is any defendant charged with a death-penalty-eligible crime?

Yes No

Is this a RICO Act gang case?

Yes No Assigned AUSA
(Lead Attorney): Maya Karwande

Date Submitted: 5/4/2021

Comments: