

ALB:CPK:DEZ/TTF  
F. #2019R00947

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

STEVEN MCCLENAHAN,

Defendant.

----- X

THE UNITED STATES CHARGES:

~~FILED IN CLERK'S OFFICE U.S. DISTRICT COURT E.D.N.Y. JUL 23 2019~~  
FILED IN CLERK'S OFFICE U.S. DISTRICT COURT E.D.N.Y. JUL 26 2019  
LONG ISLAND OFFICE

INFORMATION  
**CR 19 339**

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 981(a)(1)(C), 1349  
and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

**HURLEY, J.**

**TOMLINSON, M.J.**

INTRODUCTION

At times relevant to this Information, unless otherwise indicated:

1. The defendant STEVEN MCCLENAHAN was a resident of Clark County, Nevada.
2. In or about and between May 2011 and December 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant STEVEN MCCLENAHAN, together with others, engaged in a direct-mail scheme that sent fraudulent prize promotion mailings to thousands of consumers across the United States. The mailings induced consumers (the "Victims") to pay a fee in exchange for a falsely promised large cash prize. The object and purpose of the scheme was to obtain money from the Victims by means of false and fraudulent statements and material concealments of fact in the mailings. None of the Victims who sent a fee in response to a

fraudulent prize promotion mailing from the direct-mail scheme ever received a large cash prize.

**CONSPIRACY TO COMMIT MAIL FRAUD**

3. The allegations contained in paragraphs one and two are realleged and incorporated as if fully set forth in this paragraph.

4. In or about and between May 2011 and December 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant STEVEN MCCLENAHAN, together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud the Victims, and to obtain money and property from the Victims by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, to place matters and things in a post office and authorized depository for mail matter, to be sent and delivered by the United States Postal Service, and to take and receive therefrom, any such matter and thing, contrary to Title 18, United States Code, Section 1341.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION**

5. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property,

real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be


divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of forfeitable property described in the forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

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RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY,  
PURSUANT TO 28 C.F.R. § 0.136

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GUSTAV W. EYLER  
DIRECTOR  
CONSUMER PROTECTION BRANCH

real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or


(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of forfeitable property described in the forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c)).

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RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



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CONSUMER PROTECTION BRANCH

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*STEVEN MCCLENAHAN,*

Defendant.

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**INFORMATION**

(T. 18, U.S.C., §§ 981(a)(1)(C), 1349 and 3551 et seq.; T. 21, U.S.C., § 853(p); and T. 28, U.S.C., § 2461(c).)

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_

\_\_\_\_\_  
*Charles P. Kelly, Assistant U.S. Attorney (631) 715-7866*

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