

INFORMATION SHEET

★ NOV 01 2022 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

1. Title of Case: United States v. Gary Confredo, also known as Gary Conte," 22-CR-425 (JMA)
2. Related Magistrate Docket Number(s): \_\_\_\_\_
3. Arrest Date: \_\_\_\_\_
4. Nature of offense(s):    Felony  
                                   Misdemeanor
5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules): \_\_\_\_\_
6. Projected Length of Trial:   Less than 6 weeks     
  More than 6 weeks
7. County in which crime was allegedly committed: Nassau/Suffolk  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012.<sup>1</sup>                    Yes    No
9. Has this indictment/information been ordered sealed?            Yes    No
10. Have arrest warrants been ordered?                                    Yes    No
11. Is there a capital count included in the indictment?            Yes    No

BREON PEACE  
United States Attorney

By: /s/ Bradley T. King  
Bradley T. King  
Assistant U.S. Attorney  
(631) 715-7875

<sup>1</sup> Judge Brodie will not accept cases that were initiated before March 10, 2012.

MRM:BTK  
F. #2016R01484

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

GARY CONFREDO,  
also known as "Gary Conte,"

Defendant.

I N F O R M A T I O N

Cr. No. 22-CR-425 (JMA)  
(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))

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THE UNITED STATES ATTORNEY CHARGES:

I N T R O D U C T I O N

At all times relevant to this Information, unless otherwise indicated:

I. The Defendant and Relevant Entity

1. The defendant GARY CONFREDO, also known as "Gary Conte," was a resident of East Northport, New York. CONFREDO was an independent financial consultant. He assisted clients in preparing applications for commercial loans and lines of credit for submission to financial institutions. He was paid a percentage of the loan amount for such services.

2. The defendant GARY CONFREDO, also known as "Gary Conte," provided his loan application services through Goldstar Financial Management Corp. ("Goldstar"), which was based in Commack, New York.

3. Bank of America Corporation ("Bank of America") was a financial institution as defined in Title 18, United States Code, Section 20, and was headquartered in

Charlotte, North Carolina. The deposits of Bank of America were insured by the Federal Deposit Insurance Corporation. It was part of the business of Bank of America to provide commercial loans and lines of credit to businesses that met Bank of America's commercial lending criteria. Bank of America maintained branches in Nassau and Suffolk Counties, New York.

## II. Scheme to Defraud

4. In or about and between November 2016 and October 2019, the defendant GARY CONFREDO, also known as "Gary Conte," together with others, engaged in a scheme to fraudulently obtain funds from Bank of America by submitting false applications for commercial loans and lines of credit to Bank of America on behalf of Goldstar's clients.

5. As part of the scheme, to ensure that Goldstar's clients' loan and line of credit applications would be approved, the defendant GARY CONFREDO, also known as "Gary Conte," together with others, submitted fictitious federal income tax returns to Bank of America with applications for commercial loans and lines of credit. The fictitious returns purported to be copies of Goldstar's clients' tax returns that had been filed with the Internal Revenue Service ("IRS") when, in truth, the returns that CONFREDO and others submitted falsely inflated the incomes of Goldstar's clients and were not filed with the IRS.

6. As a further part of the scheme, the defendant GARY CONFREDO, also known as "Gary Conte," together with others, submitted fraudulently altered bank statements to Bank of America in connection with applications for commercial loans and lines of credit that were filed on behalf of Goldstar's clients. The fraudulently altered bank

statements purported to show that Goldstar's clients' bank accounts contained balances that were significantly greater than the clients' actual bank account balances.

7. In or about and between November 2016 and October 2019, the defendant GARY CONFREDO, also known as "Gary Conte," together with others caused the submission of at least twelve fraudulent applications for commercial loans and lines of credit to Bank of America on behalf of Goldstar's clients. As a result of CONFREDO's fraudulent scheme, Bank of America issued approximately \$3.2 million in commercial loans and lines of credit to Goldstar's clients and sustained losses of approximately \$1 million in connection with those commercial loans and lines of credit.

#### CONSPIRACY TO COMMIT BANK FRAUD

8. The allegations contained in paragraphs one through seven are realleged and incorporated as if fully set forth in this paragraph.

9. In or about and between November 2016 and October 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant GARY CONFREDO, also known as "Gary Conte," together with others, did knowingly and intentionally conspire to execute a scheme and artifice to defraud Bank of America, a financial institution, and to obtain moneys, funds, credits, and other property owned by, and under the control of such financial institution, by means of materially false and fraudulent pretenses, representations and promises, contrary to Title 18, United States Code, Section 1344.

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

CRIMINAL FORFEITURE ALLEGATION

10. The United States hereby gives notice to the defendant GARY CONFREDO, also known as "Gary Conte," 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.

11. 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 the forfeitable property described in this 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))

*By Carolyn Pokorny, Assistant U.S. Attorney*

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BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

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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.

GARY CONFREDO, also known as "Gary Conte,"

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);  
T. 28, U.S.C., § 2461(c))

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*A true bill.*

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*Foreperson*

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*Filed in open court this* ----- *day,*

*of* ----- *A.D. 20* -----

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*Clerk*

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*Bail, \$* -----

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***Bradley T. King, Assistant U.S. Attorney (631) 715-7900***