

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA : INFORMATION
:
- v. - : 17 Cr.
:
MICHAEL ARNSTEIN, :
:
Defendant. :
- - - - - x

COUNT ONE

(Conspiracy to Forge a Judge's Signature)

The United States Attorney charges:

1. From at least in or about February 2014 up to and including in or about February 2017, in the Southern District of New York and elsewhere, MICHAEL ARNSTEIN, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to forge a judge's signature, in violation of Title 18, United States Code, Section 505.

2. It was a part and an object of the conspiracy that MICHAEL ARNSTEIN, the defendant, and others known and unknown, willfully and knowingly, would and did forge the signature of a judge, register, and other officer of a court of the United States,

and of any Territory thereof, and forge and counterfeit the seal of such court, and knowingly concur in using such forged or counterfeit signature and seal, for the purpose of authenticating a proceeding and document, and tender in evidence such proceeding and document with a false and counterfeit signature of such judge, register, and other officer, and a false and counterfeit seal of the court, subscribed and attached thereto, knowing such signature and seal to be false and counterfeit, in violation of Title 18, United States Code, Section 505.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 3, 2014, MICHAEL ARNSTEIN, the defendant, emailed an individual in the Southern District of New York and instructed that individual to create a counterfeit judicial order by digitally altering a genuine judicial order.

b. On or about October 22, 2014, MICHAEL ARNSTEIN, the defendant, emailed a copy of a counterfeit judicial order to Google, Inc. ("Google") and requested that Google de-index Uniform Resource Locators ("URLs") contained in the counterfeit order.

(Title 18, United States Code, Section 371.)

Joon H. Kim
JOON H. KIM TH
Acting United States Attorney