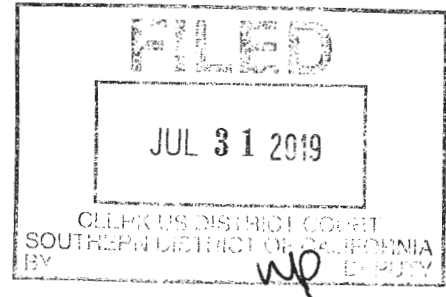


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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
SAMUEL DAVALOS, JR.,  
Defendant.

Case No. 19-cr-2267-LAB

SUPERSEDING  
I N F O R M A T I O N

Title 18, U.S.C., Sec. 1344 - Bank Fraud; and Title 18, U.S.C., Secs. 982(a)(2) and 982(b) - Criminal Forfeiture

The United States Attorney charges:

Count 1

1. On or about February 25, 2019, in the Southern District of California, defendant Samuel DAVALOS, Jr., knowingly executed and attempted to execute a material scheme and artifice to defraud Point Loma Credit Union ("PLCU"), a financial institution, with the intent to expose PLCU to a risk of loss, and to obtain money and funds from the custody and control of PLCU by means of materially false and fraudulent pretenses, representations and promises, and omissions of material fact; to wit, defendant DAVALOS made or caused to be made a check in the amount of \$3,680 drawn on the account of a PLCU member and payable to himself,

1 and bearing the member's forged signature, without the member's  
2 knowledge or authorization.

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

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6 CRIMINAL FORFEITURE ALLEGATIONS

7 2. The allegations set out above are realleged and by their  
8 reference fully incorporated herein for the purpose of alleging  
9 forfeiture to the United States of America pursuant to the provisions  
10 of Title 18, United States Code, Section 982(a)(2).

11 3. Upon conviction of the offense set forth in Count 1 and  
12 pursuant to Title 18, United States Code, Section 982(a)(2), defendant  
13 SAMUEL DAVALOS, JR. shall forfeit to the United States any property  
14 constituting or derived from proceeds he obtained directly or indirectly  
15 as the result of the violation set forth in Count 1 of the Superseding  
16 Information. The property to be forfeited includes, but is not limited  
17 to, all monies, funds, and credit held in or attributable to PLCU  
18 accounts 1061207-01 and 1061207-80, as well as a money judgment in the  
19 amount of \$117,305, which represents the full proceeds of Defendant's  
20 scheme.

21 4.If any of the property described above, as a result of any act  
22 or omission of defendant SAMUEL DAVALOS, JR., cannot be located upon the  
23 exercise of due diligence; has been transferred or sold to, or deposited  
24 with, a third party; has been placed beyond the jurisdiction of the  
25 court; has been substantially diminished in value; or has been commingled  
26 with other property which cannot be divided without difficulty, the

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1 United States shall be entitled to forfeiture of substitute property  
2 pursuant to 18 U.S.C. §§ 982(b)

3  
4 All pursuant to 18 U.S.C. §§ 982(a)(2)(A) and 982(b).

5 DATED: July 30, 2019.

6  
7 Robert S. Brewer, Jr.  
United States Attorney

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10 Nicholas W. Pilchak  
11 Assistant U.S. Attorney  
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