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2	Assistant United States Attorney 501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700		
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5	$ E_{0,0} _{1} = (010) 554,0000$	ALED	
	 6 Attorneys for Plaintiff United States of America 		
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11	Fiamuni, F	8 U.S.C. § 666(a)(1)(B) – Bribery Concerning rograms Receiving Federal Funds (2 counts); 18	
12	v.	J.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture	
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15	Derendant.		
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19		Oncerning Programs Paceiving Fodorol Eurodal	
20		someening Programs Receiving rederat Funds	
21		ICRITTENDEN	
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23		the California Department of Corrections and	
24		1. At all times material to this Indictment, the California Department of Corrections and Rehabilitation ("CDCR") was a subdivision and government agency of the State of California. CDCR	
25		houses inmates convicted of criminal offenses. CDCR received federal benefits in excess of \$10,000	
26	during the one-year period beginning July 1, 2021, and ending June 30, 2022.		
27	 STEPHEN JOSEPH CRITTENDEN was an agent of CDCR, whose duties included, but 		
28		were not limited to, guarding inmates at the California Medical Facility ("CMF"), a CDCR institution.	
	INDICTMENT 1		

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1	3. Between on or about July 7, 2021, and June 30, 2022, in the State and Eastern District of		
2	California, CRITTENDEN did corruptly accept and agree to accept a thing of value from a person and		
3	persons, intending to be influenced and rewarded in connection with business, a transaction, and series		
4	of transactions of CDCR valued at \$5,000 or more, to wit: smuggling cellular telephones into CMF, in		
5	violation of Title 18, United States Code, Section 666(a)(1)(B).		
6	COUNT TWO: [18 U.S.C. § 666(a)(1)(B) – Bribery Concerning Programs Receiving Federal Funds]		
7	The Grand Jury further charges: T H A T		
8	STEPHEN JOSEPH CRITTENDEN,		
9	1. At all times material to this Indictment, the California Department of Corrections and		
10	Rehabilitation ("CDCR") was a subdivision and government agency of the State of California. CDCR		
11	houses inmates convicted of criminal offenses. CDCR received federal benefits in excess of \$10,000		
12	during the one-year period beginning July 1, 2022, and ending June 30, 2023.		
13	2. STEPHEN JOSEPH CRITTENDEN was an agent of CDCR, whose duties included, but		
14	were not limited to, guarding inmates at the California Medical Facility, a CDCR institution.		
15	3. Between on or about July 3, 2022, and October 5, 2022, in the State and Eastern District		
16	of California, CRITTENDEN did corruptly accept and agree to accept a thing of value from a person		
17	and persons, intending to be influenced and rewarded in connection with business, a transaction, and		
18	series of transactions of CDCR valued at \$5,000 or more, to wit: smuggling cellular telephones into		
19	CMF, in violation of Title 18, United States Code, Section 666(a)(1)(B).		
20	FORFEITURE ALLEGATION: [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal		
21	Forfeiture]		
22	1. Upon conviction of one or more of the offenses alleged in Counts One and Two of this		
23	Indictment, defendant STEPHEN JOSEPH CRITTENDEN shall forfeit to the United States pursuant to		
24	18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, which constitutes or is		
25	derived from proceeds traceable to such violations, including but not limited to the following:		
26	a. A sum of money equal to the total amount of proceeds traceable to such offenses,		
27	for which the defendant is convicted.		
28	2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One and		

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	Case 2:23-cr-00235-TLN Document 1 Filed 09/14/23 Page 3 of 5		
1	Two of this Indictment, for which the defendant is convicted:		
2	a. cannot be located upon the exercise of due diligence;		
3	b. has been transferred or sold to, or deposited with, a third party;		
4	c. has been placed beyond the jurisdiction of the court;		
5	d. has been substantially diminished in value; or		
6	e. has been commingled with other property which cannot be divided without		
7	difficulty;		
8	it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to		
9	seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.		
10			
11	A TRUE BILL.		
12	/s/ Signature on file w/AUSA		
13	FOREPERSON		
14	Hill head it is the second		
15	PHILLIP A. TALBERT		
16	United States Attorney		
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	INDICTMENT		

No._____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

STEPHEN JOSEPH CRITTENDEN

$\underline{I}\,\underline{N}\,\underline{D}\,\underline{I}\,\underline{C}\,\underline{T}\,\underline{M}\,\underline{E}\,\underline{N}\,\underline{T}$

VIOLATION(S): 18 U.S.C. § 666(a)(1)(B) – Bribery Concerning Programs Receiving Federal Funds – 2 Counts 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill, /s/ Signature on file w/AUSA		
Foreman.		
Filed in open court this	<i>day</i>	
of September	, A.D. 20 <u>23</u>	
	/s/Jonathan Anderson	
Bench warrant to issue; bail TBD at initial appearance		
	U.S Magistrate Judge	

GPO 863 525

2:23-cr-0235 TLN

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<u>United States v. Crittenden</u> Penalties for Indictment

<u>Defendant</u> Stephen Joseph Crittenden

COUNTS 1 and 2:

VIOLATION:	18 U.S.C. §§ 666(a)(1)(B) – Bribery Concerning Programs Receiving Federal Funds
PENALTIES:	A maximum of 10 years in prison; or Fine of up to \$250,000; or both fine and imprisonment Supervised release of no more than 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION:

- VIOLATION: 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) Criminal Forfeiture
- PENALTIES: As stated in the charging document