

October 19, 2023

Nathan Ochsner, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

GREGORY PAUL TRAHAN

Case No. **4:23-cr-00491**

INFORMATION

The United States Attorney charges:

At all times material to this Information:

Count One

Structuring Transactions to Evade Reporting Requirements
(31 U.S.C. § 5324(a)(3))

1. From in or about 2018 and continuing until at least April 2019, the defendant, **Gregory Paul Trahan**, knowingly and willfully engaged in a scheme to structure monetary transactions to evade the reporting obligations of domestic financial institutions' legal obligations to report transactions in excess of \$10,000, known as currency transaction reports ("CTRs").

2. **Trahan** structured transactions to prevent his spouse at the time, Individual A, a person known to the United States Attorney, from knowing that he had money in undisclosed bank accounts and, additionally, secreted cash that Individual A was unaware of to prevent those funds from becoming part of the resolution of the community estate during their divorce proceedings. Specifically, **Trahan** withdrew several hundred thousand dollars from various bank accounts in amounts under the CTR reporting requirement and secreted some of those funds by making deposits, also under

the CTR reporting requirement, in other bank accounts under his control and by stashing the rest at family residences.


3. **Trahan** further aided and abetted another person, Individual C, a person known to the United States Attorney, to structure Individual C's funds from becoming part of the equitable distribution of the marital estate during Individual C's divorce. Specifically, beginning in 2018 and continuing in 2019, **Trahan** took possession of approximately \$161,540 from Individual C in money orders and cashier's checks, some of which Individual C purchased with cash and almost entirely in amounts less than \$10,000.

4. During 2018 through 2019, **Trahan** made twenty cash deposits, all in amounts less than \$10,000, with the intent to avoid the creation of CTR's by banks. These deposits totaled \$77,900.

5. On or about November 27, 2018, in the Houston Division of the Southern District of Texas, defendant **Gregory Paul Trahan**, knowingly and willfully deposited \$9,700.00 in a domestic bank known to the United States Attorney, which bank **Trahan** knew was obligated to report transactions in excess of \$10,000, and **Trahan** made such deposit for the purpose of evading the bank's reporting obligation, in violation of 31 U.S.C. § 5324(a)(3).

All in violation of 31 U.S.C. § 5324(a)(3).

LEIGHA SIMONTON
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