UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA	:	CONSENT PRELIMINARY ORDER OF FORFEITURE/ MONEY JUDGMENT
- v. -	:	
STEVEN LACAJ,	:	24 Cr 362 (VSB)
Defendant.	:	

WWHEREAS, on or about June 6, 2024, STEVEN LACAJ (the "Defendant"), among others, was charged in a four-count Indictment, 24 Cr. 362 (VSB) (the "Indictment"), with conspiracy to commit securities fraud, wire fraud, and investment adviser fraud, in violation of Title 18, United States Code, Section 371 (Count One); securities fraud, in violation of Title 15, United States Code, Sections 78j(b) and 78ff; and Title 18, United States Code, Section 2 (Count Two); wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2 (Count Three); and investment adviser fraud, in violation of Title 15, United States Code, Sections 80b-6 and 80b-17; and Title 18, United States Code, Section 2 (Count Four);

WEREAS, the Indictment included a forfeiture allegation as to Counts One through Four of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real, and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts One through Four of the Indictment that the Defendant personally obtained, including but not limited to a sum of money of at least $185 million as a result of the commission of the offenses charged in Counts One through Four of the Indictment;

WHEREAS, on or about January 22, 2026, the Defendant pled guilty to Counts One and Four of the Indictment, pursuant to a plea agreement with the Government;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of $7,700,000 in United States currency, representing the amount of proceeds traceable to the offenses charged in Counts One and Four of the Indictment that the Defendant personally obtained; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Counts One and Four of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney James M. McDonald, United States Attorney, Assistant United States Attorney Matthew Shahabian, of counsel, and the Defendant and his counsel, Scott Leemon, Esq., that:

1. As a result of the offenses charged in Counts One and Four of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of $7,700,000 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offenses charged in Counts One and Four of the Indictment that the Defendant personally obtained, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant STEVEN LACAJ, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38th Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

JAMES M. MCDONALD
United States Attorney for the
Southern District of New York

By: ______________________ 9/23/26
DATE

Matthew Shahabian
Assistant United States Attorney
26 Federal Plaza
New York, NY 10278
(212) 637-1046

STEVEN LACAJ

By: ______________________ 09-23-26.
DATE

Steven Lacaj

By: ______________________ 9/23/26
DATE

Scott Leemon, Esq.
Attorney for Defendant
41 Madison Avenue
New York, NY 10010

SO ORDERED:

______________________ 9/23/26
DATE

HONORABLE VERNON S. BRODERICK
UNITED STATES DISTRICT JUDGE