

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

CRIMINAL NO. LKG-25-6

THOMAS C. GOLDSTEIN,

Defendant

JOINT STIPULATIONS OF FACT

1. On July 12, 2019, Thomas Goldstein sent an email to Attorney J.M. In that email, Mr. Goldstein wrote, in pertinent part:

As I also explained and documented [...] this is also totally and utterly pointless, because I have no money. [...] I have a massive tax lien, which is a public record. I owe more than \$16 million dollars privately, in addition. I own around \$100,000 in equity in my house.

2. In tax year 2016, Thomas Goldstein received poker winnings from the following individuals in the following amounts:

<u>Name</u>	<u>2016 Poker Winnings</u>
	<u>Amounts</u>
Alec Gores	\$26,435,000
Kevin Hart	\$200,000
Andrew Robl	\$100,000
Gambling Winnings:	\$26,735,000

3. In tax year 2016, Thomas Goldstein paid poker losses or made poker staking payments to the following individuals in the following amounts:

<u>Name</u>	<u>2016 Poker Losses or Staking Amounts</u>
Alan Keating	\$25,000
Alfred Decarolis	\$1,746,600
Andrew Robl	\$4,624,700
Anthony Gregg	\$60,000
Bob Safai	\$6,679,000
Chamath Palihapitiya	\$176,000

<u>Name</u>	<u>2016 Poker Losses or Staking Amounts</u>
Dan Bilzerian	\$1,408,000
Daniel Cates	\$750,000
Edwin Ting	\$1,288,000
Keith Gipson	\$904,000
Lauren Roberts	\$1,400,000
Richard Salomon	\$851,000
Roger Sippl	\$67,400
Sean Dempsey	\$406,000
Thomas Dwan	\$550,000
Unknown	\$708,000
Gambling Losses or Staking Payments:	\$21,643,700

4. In tax year 2017, Thomas Goldstein received poker winnings from the following individuals in the following amounts:

<u>Name</u>	<u>2017 Poker Winnings Amounts</u>
Bob Safai	\$3,256,500
Gambling Winnings:	\$3,256,500

5. In tax year 2017, Thomas Goldstein paid poker losses or made poker staking payments to the following individuals in the following amounts:

<u>Name</u>	<u>2017 Poker Losses or Staking Amounts</u>
Andrew Robl	\$650,000
Bob Safai	\$6,794,300
Dan Bilzerian	\$100,000
David Cho	\$332,700
Michael Baxter	\$79,000
Richard Salomon	\$200,000
Thomas Dwan	\$680,000
Gambling Losses or Staking Payments:	\$8,836,000

6. In tax year 2018, Thomas Goldstein paid poker losses or made poker staking payments to the following individuals in the following amounts:

<u>Name</u>	<u>2018 Poker Losses or Staking Amounts</u>
Bob Safai	\$220,000
Gambling Losses:	\$220,000

7. In tax year 2019, Thomas Goldstein received poker winnings from the following individuals in the following amounts:

<u>Name</u>	<u>2019 Poker Winnings Amounts</u>
Jean Robert Bellande	\$250,000
Gambling Winnings:	\$250,000

8. In tax year 2019, Thomas Goldstein paid poker losses or made poker staking payments to the following individuals in the following amounts:

<u>Name</u>	<u>2019 Poker Losses or Staking Amounts</u>
Bob Safai	\$140,000
Charles Hook	\$60,000
Charles Pacheco	\$170,000
Randall Emmett	\$100,000
Gambling Losses or Staking Payments:	\$470,000

9. In tax year 2020, Thomas Goldstein received poker winnings from the following individuals in the following amounts:

<u>Name</u>	<u>2020 Poker Winnings Amounts</u>
Charles Pacheco	\$23,180
Gambling Winnings:	\$23,180

10. In tax year 2020, Thomas Goldstein paid poker losses or made poker staking payments to the following individuals in the following amounts:

<u>Name</u>	<u>2020 Poker Losses or Staking Amounts</u>
Bob Safai	\$210,000
Dan Bilzerian	\$100,000
Gambling Losses or Staking Payments:	\$310,000

11. In tax year 2021, Thomas Goldstein received poker winnings from the following individuals in the following amounts:

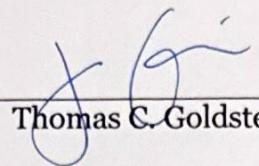
<u>Name</u>	<u>2021 Poker Winnings Amounts</u>
Jean Robert Bellande	\$102,000
Alfred Decarolis	\$75,000
Gambling Winnings:	\$177,000

12. In tax year 2021, Thomas Goldstein paid poker losses or made poker staking payments to the following individuals in the following amounts:

<u>Name</u>	<u>2021 Poker Losses or Staking Amounts</u>
Bob Safai	\$119,863
Dan Bilzerian	\$20,000
Jean Robert Bellande	\$150,000
Matthew Honig	\$220,000
Thomas Dwan	\$60,000
Gambling Losses or Staking Payments:	\$569,863

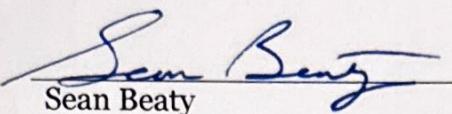
13. The parties may present evidence of additional transactions not mentioned in this stipulation.

I have reviewed the factual stipulations above and I agree that they are true and correct.


Thomas C. Goldstein

1.19.26

Date


Sean Beaty
Senior Litigation Counsel
Emerson Gordon-Marvin
Hayter Whitman
Trial Attorneys
Criminal Division

January 19, 2026

Date

Adeyemi Adenrele
Assistant United States Attorney
District of Maryland