

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

THOMAS C. GOLDSTEIN,

Defendant

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CRIMINAL NO. LKG-25-6

FOURTH JOINT STIPULATIONS OF FACT

1. In calendar year 2020, Thomas Goldstein paid poker losses totaling \$350,000 to Michael McGuiness, as listed in the transactions below:

<u>Date</u>	<u>Amount</u>
06/09/2020	\$100,000
08/18/2020	\$100,000
09/11/2020	\$150,000
Total Gambling Losses	\$350,000

2. On September 22, 2020, Thomas Goldstein received income—in the form of \$70,000 in poker winnings—from Michael McGuiness.

3. On May 5, 2021, Thomas Goldstein paid a \$150,000 poker loss to Michael McGuiness.

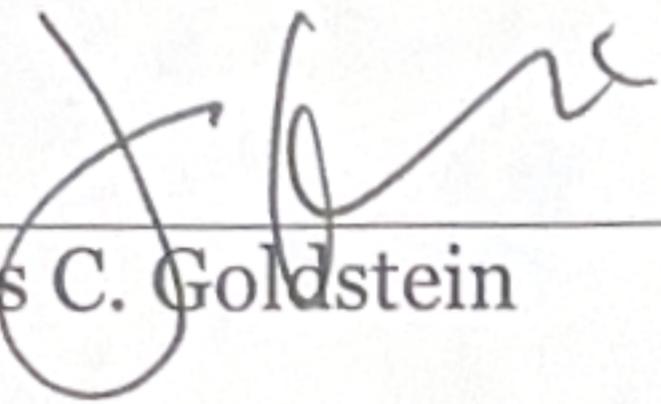
4. On May 17, 2021, Thomas Goldstein received income—in the form of \$75,000 in poker winnings—from Michael McGuiness.

5. In 2022, Thomas Goldstein and Michael McGuiness entered an agreement in which Mr. Goldstein would invest in Mr. McGuiness's poker matches against other players by loaning him money to fund those matches. On May 27, 2022, Mr. Goldstein wired \$800,000 to Mr. McGuiness as the first part of that loan. On August 16, 2022, Mr. Goldstein wired \$200,000 to Mr. McGuiness as the second part of that loan.

(continued on next page)

6. On October 24, 2022, Thomas Goldstein made a poker staking payment of \$500,000 to Michael McGuiness for Mr. McGuiness's piece of Mr. Goldstein's winnings from poker matches against Andrew Beal.

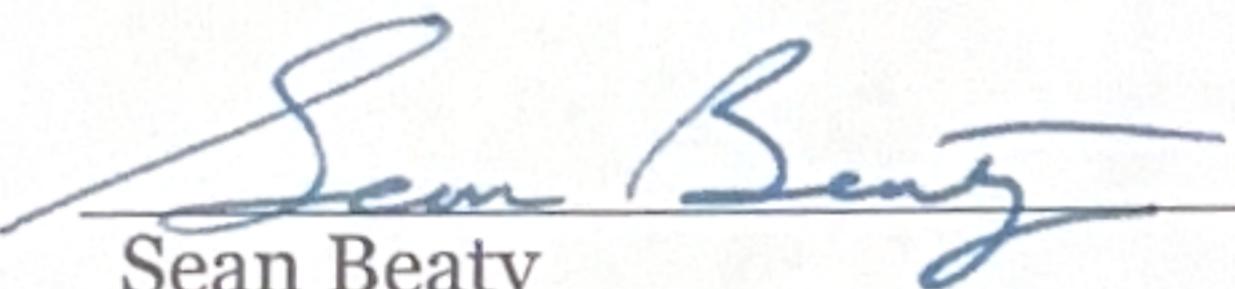
I have reviewed the factual stipulations above and I agree that they are true and correct.



Thomas C. Goldstein

2.2.26

Date



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

February 26, 2026

Date

Adeyemi Adenrele
Assistant United States Attorney
District of Maryland