

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 24-10084-AK
)	
v.)	Violation:
)	
STAVROS PAPANTONIADIS,)	<u>Count One</u> : False Statements
a/k/a "Steve Papantoniadis,")	(18 U.S.C. § 1001(a)(2))
)	
Defendant)	

SUPERSEDING INFORMATION

At all times relevant to this Information:

General Allegations

1. Defendant STAVROS PAPANTONIADIS, a/k/a "Steve Papantoniadis," was a resident of the District of Massachusetts.
2. Through various corporate entities, PAPANTONIADIS owned and controlled a group of pizzerias located in the District of Massachusetts (collectively, "Stash's Pizzerias").
3. 1225 North Main St LLC was a Massachusetts limited liability company that PAPANTONIADIS owned and controlled.
4. Beginning on a date unknown and continuing to in or around April 2021, 1225 North Main St LLC was a company that was doing business as Boston Pizza Company of Randolph.
5. Beginning on a date unknown and continuing to in or around April 2021, Boston Pizza Company of Randolph was a PAPANTONIADIS-owed pizzeria located at 1225 North Main Street in Randolph, Massachusetts (hereinafter, the "Randolph Location").

6. In or around April 2021, PAPANTONIADIS sold the Randolph Location. On or about September 29, 2021, the Secretary of the Commonwealth of Massachusetts deemed the entity 1225 North Main St LLC cancelled.

7. The United States Small Business Administration (“SBA”) was an agency of the executive branch of the United States government. The mission of the SBA was to maintain and strengthen the nation’s economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters. As part of this effort, the SBA enabled and provided for loans, guaranteed by the government, through banks, credit unions, and other lenders.

8. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in March 2020 to provide emergency financial assistance to Americans suffering the economic effects of the COVID-19 pandemic. Among other things, the CARES Act expanded the SBA’s Economic Injury Disaster Loan (“EIDL”) program to provide loans of up to \$2 million to small businesses that suffered “substantial economic injury” from COVID-19. The EIDL program required recipients to use EIDL funds only on certain business expenses, including payments of fixed business debts and payroll.

9. EIDL funds were issued directly from the United States Treasury. Applicants applied through the SBA via an online portal. The EIDL application process required applicants to provide information concerning the affected business, including the number of employees, gross revenues, and costs of goods sold in the 12 months prior to January 31, 2020, as well as information about the business owner. Applicants electronically certified that the information provided was

accurate. The SBA relied on the information provided by the applicant to determine how much money the small business was eligible to receive in the form of EIDL funds.

The False Statements

10. Beginning in or around April 2021, and continuing to in or around January 2022, PAPANTONIADIS engaged in fraud to obtain pandemic-related relief funds, including EIDL funds, by making materially false statements to the SBA to obtain a loan through the EIDL program, and by improperly using the fraudulently obtained EIDL funds for personal and unauthorized expenses.

11. On or about November 22, 2021, PAPANTONIADIS caused an EIDL application to be submitted to the SBA on behalf of 1225 North Main St LLC, doing business as Boston Pizza Company. The application requested a loan in the amount of \$986,900.00. In the application, PAPANTONIADIS represented that Boston Pizza Company was a restaurant located at 1225 North Main Street in Randolph, Massachusetts. He also represented that the restaurant then had 18 employees. At the end of the application, PAPANTONIADIS caused a box to be checked certifying “under penalty of perjury under the laws of the United States” that the information in the application was “true and correct.”

12. PAPANTONIADIS falsely represented to the SBA that 1225 North Main St LLC was then an entity that ran Boston Pizza Company (i.e., the Randolph location) and employed 18 employees. In truth and in fact, PAPANTONIADIS did not own and operate the Boston Pizza Company restaurant when he caused the EIDL application to be submitted. As of on or about November 22, 2021, 1225 North Main St LLC did not have 18 employees working at the Randolph Location.

13. On or about December 4, 2021, the SBA denied PAPANTONIADIS' EIDL application. However, between on or about December 4, 2021, and on or about December 28, 2021, PAPANTONIADIS and his certified public accountant, Person 1, sent documents and information to SBA personnel to cause the SBA to approve the loan. In an attempt to falsely assure the SBA that 1225 North Main St LLC was still a viable entity doing business as Boston Pizza Company, PAPANTONIADIS caused Person 1 to send the SBA, among other things, a "certificate of good standing and/or tax compliance," certifying that 1225 North Main St LLC was in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

14. Following PAPANTONIADIS and Person 1's submissions, on or about December 28, 2021, the SBA approved PAPANTONIADIS' application on behalf of 1225 North Main St LLC and authorized a loan in the amount of \$500,000.00.

15. On or about January 4, 2022, the United States Treasury sent PAPANTONIADIS loan proceeds in the amount of \$499,900.00.

COUNT ONE
False Statements
(18 U.S.C. § 1001(a)(2))

The United States Attorney charges:

16. Paragraphs 1 through 15 of the Superseding Information are realleged and incorporated herein.

17. On or about November 22, 2021, in the District of Massachusetts, the defendant,

STAVROS PAPANTONIADIS,
a/k/a "Steve Papantoniadis,"


knowingly and willfully made a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, PAPANTONIADIS caused an EIDL application to be submitted to the SBA on behalf of 1225 North Main St LLC, doing business of Boston Pizza Company, in which he falsely represented, under penalty of perjury, that:

- a. PAPANTONIADIS then owned a restaurant called Boston Pizza Company located at 1225 North Main Street in Randolph, Massachusetts; and
- b. PAPANTONIADIS then had 18 employees working at the restaurant.

All in violation of Title 18, United States Code, Section 1001(a)(2).

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By 
BRIAN A. FOGERTY
TIMOTHY E. MORAN
Assistant United States Attorneys