UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA	:	NOLLE PROSEQUI
-v.-	:	19 Cr. 830 (AT)
TOVA NOEL and MICHAEL THOMAS,	:	
Defendants.	:	

1. The filing of this nolle prosequi will dispose of this case with respect to TOVA NOEL and MICHAEL THOMAS, the defendants.

2. On or about November 19, 2019, a grand jury sitting in this District returned Indictment 19 Cr. 830 (AT), which charged TOVA NOEL and MICHAEL THOMAS, the defendants, with committing offenses against the United States, to wit, conspiring to knowingly defraud the United States and to knowingly make and use a false writing or document, in violation of 18 U.S.C. § 371, and knowingly making and using a false writing or document, in violation of 18 U.S.C. § 1001.

3. On or about May 20, 2021, TOVA NOEL and MICHAEL THOMAS, the defendants, entered into deferred prosecution agreements with the Government. Under the agreements, prosecution was deferred for a period of six months during the term of NOEL's and THOMAS's good behavior, completion of community service, and

satisfactory compliance with the terms of the agreement. The United States Pretrial Services Office has informed the Government that NOEL and THOMAS have complied with the terms of the agreement during the period of deferral, which expired on November 20, 2021.

4. In light of the foregoing, the Government recommends that an order of nolle prosequi be filed as to TOVA NOEL and MICHAEL THOMAS, the defendants, with respect to Indictment 19 Cr. 830 (AT).

Nicolas Roos
Assistant United States Attorney
(212) 637-2421

Dated: New York, New York
December 13, 2021

DOJ-OGR-00022145

Upon the foregoing recommendation, I hereby direct, with leave of the Court, that an order of nolle prosequi be filed as to defendants TOVA NOEL and MICHAEL THOMAS with respect to Indictment 19 Cr. 830 (AT).

Damian Williams
United States Attorney
Southern District of New York

Dated: New York, New York
December 13, 2021

SO ORDERED:

HONORABLE ANALISA TORRES
United States District Judge
Southern District of New York

Dated: New York, New York
_____, 2021