Approved:

Eduard Imperatore

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EDWARD A. IMPERATORE

Assistant United States Attorney

Before:

THE HONORABLE DEBRA FREEMAN United States Magistrate Judge Southern District of New York

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SEALED COMPLAINT

UNITED STATES OF AMERICA

Violations of

v. - ' :

18 U.S.C. §§ 1343, 1349, 1956, and 2

CHARLES HUGGINS,

CHRISTOPHER BUTCHKO, and

ANNE THOMAS,

COUNTY OF OFFENSE:

NEW YORK

Defendants.

SOUTHERN DISTRICT OF NEW YORK, ss.:

MATTHEW B. TAYLOR, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE

(Conspiracy To Commit Wire Fraud)

- 1. From at least in or about 2008 through in or about September 2011, in the Southern District of New York and elsewhere, CHARLES HUGGINS, CHRISTOPHER BUTCHKO, and ANNE THOMAS, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with others to commit offenses against the United States, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343.
- 2. It was a part and object of the conspiracy that CHARLES HUGGINS, CHRISTOPHER BUTCHKO, and ANNE THOMAS, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to, would and did transmit and cause to be transmitted by means of wire, radio,

and televison communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

Overt Acts

- 3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:
- a. On or about June 27, 2008, CHARLES HUGGINS, the defendant, caused an investor to wire \$250,000 from an account at a bank in Texas to an account at Bank of America located in New York, New York.
- b. On or about June 18, 2010, CHRISTOPHER BUTCHKO, the defendant, caused an investor to wire \$25,000 from an account at a bank in Texas to an account at Bank of America located in New York, New York.
- c. On or about December 16, 2010, ANNE THOMAS, the defendant, withdrew \$9,000 in cash, representing the proceeds of investor funds, from an account at Bank of America located in New York, New York.

(Title 18, United States Code, Section 1349.)

COUNT TWO (Wire Fraud)

4. From at least in or about 2008 through in or about September 2011, in the Southern District of New York and elsewhere, CHARLES HUGGINS and CHRISTOPHER BUTCHKO, the defendants, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, willfully and knowingly did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE (Money Laundering)

5. From at least in or about 2008 through in or about September 2011, in the Southern District of New York and elsewhere, ANNE THOMAS, the defendant, knowing that the property involved in financial transactions represented the proceeds of unlawful activity, to wit, violations of Title 18, United States Code, Section 1349, willfully and knowingly conducted and attempted to conduct financial transactions which in fact involved the proceeds of the specified unlawful activity and knowing that the transactions were designed in whole and in part to avoid a transaction reporting requirement under State and Federal law, to wit, the reporting requirements of Title 31, United States Code, Section 5331 and regulations prescribed under such section.

(Title 18, United States Code, Section 1956(a)(i)(B)(ii).)

The bases for my knowledge and the foregoing charges are, in part, as follows:

- 6. I have been a Special Agent with the FBI for approximately four years. I am currently assigned to a squad responsible for investigating securities and wire fraud, money laundering, and other white-collar offenses. I have participated in numerous investigations of these offenses, and I have made and participated in making arrests of numerous individuals for participating in such offenses.
- 7. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement officers and witnesses. This affidavit is based upon my investigation, my conversations with witnesses and other law enforcement agents, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Relevant Entities And Individuals

8. Based upon my review of publicly available documents and bank records, I have learned the following:

- a. JYork Industries Inc. ("JYork") and Urogo Inc. ("Urogo") are private companies that solicit and collect money from investors around the country for diamonds and gold purportedly mined in Sierra Leone and Liberia.
- b. Oraco Resources ("Oraco") is a publicly traded company with its principal place of business in Rochester, New York. The majority shareholders of Oraco have included CHARLES HUGGINS, CHRISTOPHER BUTCHKO, ANNE THOMAS, the defendants, and one of their associates ("Associate-1").
- c. HUGGINS is president and director of JYork, president of Urogo, and chief executive consultant of Oraco.
- d. BUTCHKO is an officer of JYork and executive vice president and chief operating officer of Oraco.
- e. THOMAS is vice president, secretary and treasurer of JYork, vice president of Urogo, and controller, secretary, and treasurer of Oraco.

The Scheme To Defraud

- 9. Based upon my review of documents provided to investors, documents provided by banks, and based upon my interviews of investors and other witnesses, I have learned that, from at least in or about 2008 through in or about September 2011, CHARLES HUGGINS and CHRISTOPHER BUTCHKO, the defendants, and others known and unknown, solicited millions of dollars from various investors through JYork and Urogo with false and misleading representations that they would use the investors' money to mine gold and diamonds from Sierra Leone and Liberia. HUGGINS and BUTCHKO falsely promised investors, among other things, high rates of return on their investments, which they represented were based upon the profits generated by the sale of the gold and diamonds in the United States.
- 10. In truth and in fact, however, from at least 2008 through in or about September 2011, CHARLES HUGGINS, CHRISTOPHER BUTCHKO, and ANNE THOMAS, the defendants, misappropriated millions of dollars of investors' funds and used those funds either to repay other investors or for their own purposes. As set forth in more detail below, HUGGINS, BUTCHKO, THOMAS, and others solicited approximately \$2.5 million from investors who understood that their investments would be used exclusively to further the mining of diamonds and gold in West Africa, which would be shipped to the United States and sold at a profit. Contrary to the representations of HUGGINS, BUTCHKO, THOMAS, and others, however, only a small portion of the funds raised from investors was transferred to Africa. Instead, a

portion of the funds was used to make payments to other investors in the scheme. Another portion of the funds was used to pay expenses entirely unrelated to JYork's and Urogo's business functions. The majority of the funds was misappropriated by HUGGINS, BUTCHKO, THOMAS for their own personal use and for purposes unrelated to what was represented to investors.

11. As part of the fraud scheme, ANNE THOMAS, the defendant, issued checks and wire transfers - representing the proceeds of approximately \$831,500 in investor funds - to another individual ("Individual-1"). Individual-1 cashed or deposited those checks into a separate account.

Representations To Individual Investors Victim-1

- 12. Based upon my interview of an individual who invested in JYork ("Victim-1") and records that Victim-1 provided to me, I have learned the following:
- a. In early 2010, an associate of Victim-1 ("Victim-2") advised Victim-1 of an opportunity to invest in gold that was being mined in Africa. Victim-2 told Victim-1 that Victim-2 had invested \$25,000 in JYork through CHRISTOPHER BUTCHKO, the defendant.
- b. In or about May or June 2010, Victim-1 called BUTCHKO to discuss a potential investment. BUTCHKO represented to Victim-1, in sum and substance, that if he invested \$25,000 in JYork, his funds would be used to purchase gold from Sierra Leone and Liberia and that the gold would be transported to New York where it would be refined and sold for a profit.
- c. Victim-1 asked BUTCHKO how a return on his investment would be guaranteed. BUTCHKO responded that JYork had been investing in gold for 25 years and owned Ozuro Jewelry, a jewelry store in New York, which would reimburse Victim-1 with its sales proceeds.
- d. Based upon BUTCHKO's representations, Victim-1 invested \$25,000 in JYork.
- e. Shortly thereafter, Victim-2 received an-email from BUTCHKO attaching a "Gold Purchase Agreement," signed by BUTCHKO, which outlined the terms of Victim-1's investment. The agreement stated, among other things, that Victim-1's investment would be "for use in the purchase of gold and export fees in the countries of origin." Before Victim-1 invested, BUTCHKO provided to Victim-1 a prospectus, signed by BUTCHKO, stating that JYork

had already invested more than \$5 million in West Africa and that "each transaction typically returns monies pooled, plus 25%."

- f. In or about July 2010, Victim-2 advised Victim-1 that BUTCHKO had informed Victim-2 that no gold had been purchased, and that Victim-1's funds would be used to purchase diamonds instead. In response, Victim-1 contacted BUTCHKO and requested that his investment in JYork be refunded. BUTCHKO responded that none of Victim-1's funds could be returned.
- 13. Based upon my review of bank records relating to accounts controlled by JYork and records provided by Victim-1, I have learned the following:
- a. On or about June 18, 2010, Victim-1 wired \$25,000 from an account at a bank in Texas to a bank account controlled by JYork at Bank of America in New York, New York (the "JYork Account").
- b. Victim-1 has not received any payment from JYork to date.

Victim-2

- 14. Based upon my interview of Victim-2 and records that Victim-2 provided to me, I have learned the following:
- a. In or about December 2009, Victim-2 met CHRISTOPHER BUTCHKO, the defendant, who advised Victim-2 that JYork was in the business of mining and selling gold and seeking investments from private investors. BUTCHKO represented to Victim-2 that he would receive a 30 percent return on his investment after JYork sold the gold that it had mined to American customers. BUTCHKO also told Victim-2 that CHARLES HUGGINS, the defendant, was the "kingpin" of the operation.
- b. On the basis of BUTCHKO's representations, Victim-2 invested \$25,000 in JYork.
- c. On or about December 6, 2009, Victim-2 received from BUTCHKO by e-mail a "Gold Purchase Agreement," signed by BUTCHKO, and other documents relating to his investment. The agreement stated, among other things, that Victim-1's investment would be "for use in the purchase of gold and export fees in the countries of origin." Before Victim-2 invested, BUTCHKO provided to Victim-2 a prospectus, signed by BUTCHKO, stating that JYork had already invested more than \$5 million in West Africa and that "each transaction typically returns monies pooled, plus 25%."

- d. On or about December 16, 2009, BUTCHKO sent an e-mail to Victim-2 in which he represented that "[t]hings are going well" and that BUTCHKO was "actively buying gold by the Ounce as we speak."
- e. On or about January 3, 2010, BUTCHKO sent an e-mail to Victim-2 attaching a new "Gold Purchase Agreement," signed by BUTCHKO. In that e-mail, BUTCHKO stated that "we are 'pooling' the funds together for better buying power" and promised Victim-2 that he would receive "25% of the monies invested."
- f. A short time later, however, BUTCHKO informed Victim-2 that JYork was able to obtain only a small amount of gold from Sierra Leone and that JYork's shipping company was no longer able to transport gold from Sierra Leone to the United States. BUTCHKO advised Victim-2 that JYork would use his investment to purchase diamonds instead of gold. The diamond investment was not addressed in Victim-2's gold purchase agreement.
- g. On or about September 9, 2010, BUTCHKO sent an e-mail to Victim-2 soliciting further investments and stating: "As you know, we are in the process of purchasing several other stones and more gold and this program is finally up and rolling. We also now have \$200,000 of purchasing power and soon will have some of the other funds from the other investors which will bring us to over \$1 million."
- h. In or about approximately December 2011, BUTCHKO contacted Victim-2 and advised him that his investment was no longer being used to purchase gold or diamonds but instead would be used to create the public company Oraco. Although BUTCHKO promised Victim-2 25,000 restricted shares in Oraco, Victim-2 has yet to receive any stock certificates.
- 15. Based upon my review of bank records relating to accounts controlled by JYork and records provided by Victim-2, I have learned the following:
- a. On or about December 8, 2009, Victim-2 wired \$25,000 from an account at a bank in Virginia to the JYork Account in New York, New York.
- b. Victim-2 has not received any payment from JYork to date.

Victim-3

16. Based upon my interview of an individual who invested in JYork ("Victim-3") and records that Victim-3 provided to me, I have learned the following:

- a. Victim-3 learned about JYork and CHARLES HUGGINS, the defendant, through another investor. In early 2010, Victim-3 traveled to New York to meet with HUGGINS to discuss a potential investment. HUGGINS told Victim-3 that JYork purchased diamonds in West Africa and sold them at a profit at HUGGINS's jewelry store on Fifth Avenue in New York, New York. HUGGINS promised Victim-3 that his investment funds would be used to purchase diamonds in West Africa.
- b. Victim-3 also had telephone conference calls with HUGGINS, CHRISTOPHER BUTCHKO, and ANNE THOMAS, the defendants, in which they discussed terms of Victim-3's potential investment.
- c. On the basis of HUGGINS's representations, on or about December 1, 2010, Victim-3 received from HUGGINS by email a "Purchase Agreement" memorializing Victim-3's agreement to invest \$100,000 in JYork. The agreement stated that Victim-3's investment would be used only to purchase gold and diamonds. The Agreement further stated that Victim-3 would receive "45% of the net proceeds" of his investment "pursuant to the sale of gold and/or diamonds purchased in West Africa."
- d. On or about December 7, 2010, HUGGINS sent an e-mail to Victim-3 in which he represented: "per our agreement I have dispatched my associates to the mining sites to begin negotiating parcels for our deal, so we can take advantage of December and January deals to maximize your investment. I ask that you make the wire transfer expeditiously so we will have no delays." On that day, Victim-3 wired \$100,000 to JYork.
- e. Approximately one year later, Victim-3 called and e-mailed HUGGINS and BUTCHKO to inquire why he had not received the return on his investment that HUGGINS and BUTCHKO had promised him. HUGGINS and BUTCHKO advised Victim-3 that JYork would be listed on a public stock exchange and that each dollar of his investment in JYork would be converted into one share of Oraco. Although HUGGINS and BUTCHKO solicited further investments from Victim-3, Victim-3 declined.
- f. Shortly thereafter, HUGGINS and BUTCHKO sent Victim-3 a document outlining the conversion of his investment into restricted shares of Oraco.
- g. Although ANNE THOMAS, the defendant, advised Victim-3 by e-mail on or about December 31, 2011 that he would receive restricted shares of Oraco, Victim-3 has yet to receive any stock certificates.

- 17. Based upon my review of bank records relating to accounts controlled by JYork and records provided by Victim-3, I have learned the following:
- a. On or about December 7, 2010, Victim-3 wired \$100,000 from an account at a bank in Texas to the JYork Account in New York, New York.
- b. Victim-3 received investment payments from JYork in March, June, and October 2011, which totaled between \$11,000 and \$12,000. Victim-3, however, has not received any further payment from JYork to date.

<u>Victim-4</u>

- 18. Based upon my interview of an individual who invested in JYork ("Victim-4") and records that Victim-4 provided to me, I have learned the following:
- a. In or about 2008, Victim-4, a renowned former professional athlete, met with CHARLES HUGGINS, the defendant, on several occasions at HUGGINS's office in New York, New York, to discuss a potential investment in diamonds. HUGGINS represented to Victim-4 that HUGGINS had experience in the diamond business and owned one or two diamond mines in Africa. HUGGINS also provided Victim-4 photographs of HUGGINS and CHRISTOPHER BUTCHKO, the defendant, mining diamonds in Africa.
- b. On or about July 1, 2008, Victim-4 and HUGGINS entered into an agreement, signed by HUGGINS, which provided that Victim-4 would invest \$250,000 in JYork and that JYork would use Victim-4's investment "solely for the costs of the importation and purchase of Uncut Diamonds and for no other purpose." The agreement stated that JYork and HUGGINS shall notify Victim-4 in writing within three business days of each use of the investment funds, indicate the amount of the funds disbursed and the purpose of the disbursement, and provide Victim-4 "Kimberly Process Certificates" authenticating each diamond that JYork obtained. The agreement further provided that JYork would sell the diamonds and that the proceeds would be used to repay the principal of Victim-4's investment plus 25 percent interest.
- c. For approximately one year after Victim-4 had invested in JYork, Victim-4 tried unsuccessfully to reach HUGGINS to inquire why he had not received any payment from JYork. Victim-4 then retained counsel, who contacted HUGGINS. In response, HUGGINS provided Victim-4 approximately 10 to 15 diamonds, which were not accompanied by any Kimberly certificates, purportedly in satisfaction of Victim-4's investment. Victim-4 had the diamonds appraised and determined that they were worth

only approximately \$50,000. Victim-4 returned those diamonds to HUGGINS.

- d. Sometime thereafter, counsel retained by Victim-4 threatened arbitration. In response, Associate-1 offered Victim-4 restricted shares in the public company Oraco. Victim-4 declined that offer.
- 19. Based upon my review of bank records relating to accounts controlled by JYork and records provided by Victim-4, I have learned the following:
- a. On or about June 27, 2008, Victim-4 wired \$250,000 from an account at a bank in Texas to the JYork Account in New York, New York.
- b. Victim-4 has not received any payment from JYork to date.

Victim-5

- 20. Based upon my interview of an individual who invested in Urogo ("Victim-5") and records that Victim-5 provided to me, I have learned the following:
- a. In or about February 2010, Victim-5 participated in several conference calls with CHARLES HUGGINS, the defendant, and Associate-1 to discuss a potential investment in Urogo. HUGGINS and Associate-1 informed Victim-5 that Urogo was in the business of mining gold and diamonds in West Africa and selling the gold and diamonds for a profit to purchasers in the United States.
- b. During the conference calls, HUGGINS advised Victim-5 that Urogo was seeking an investment from Victim-5 in order to fund a trip that Urogo officials would take to Saudi Arabia to solicit tens of millions of dollars from a wealthy Saudi investor. HUGGINS represented that he would repay the principal of Victim-5's investment using the funds that HUGGINS would obtain from the Saudi investor and that Victim-5 would receive a percentage ownership interest in Urogo's mines in West Africa. On the basis of HUGGINS's representations, Victim-5, together with his wife and son, invested \$50,000 in Urogo.
- c. Thereafter, HUGGINS informed Victim-5 that Urogo's trip to Saudi Arabia had been unsuccessful because Saudi law required that Urogo officials have a residence in Saudi Arabia before they could solicit Saudi investments. HUGGINS nevertheless represented to Victim-5 that if Victim-5 made an additional investment to fund a second trip and temporary housing for Urogo

officials in Saudi Arabia, HUGGINS would repay Victim-5 with interest using the funds that HUGGINS would obtain from the Saudi investor. On the basis of these representations, Victim-5, together with his wife and son, invested an additional \$70,000 in Urogo.

- d. In or about March 2010, HUGGINS advised Victim-5 that his second trip to Saudi Arabia was unsuccessful because the Saudi investor that they solicited was the subject of civil litigation. HUGGINS nevertheless assured Victim-5 that Urogo was soliciting additional investments and that Urogo would repay Victim-5 with the proceeds that Urogo stood to receive from other investors.
- 21. Based upon my review of bank records relating to accounts controlled by Urogo and records provided by Victim-5, I have learned the following:
- a. On or about February 18, 2010, Victim-5 wired \$7,000 from an account at a bank in Michigan (the "Michigan Account") to an account controlled by Urogo at Bank of America in New York, New York (the "Urogo Account"). On or about February 19, 2010, Victim wired \$18,000 from the Michigan Account to the Urogo Account in New York, New York. On or about March 19, 2010, Victim-5 wired \$20,000 from the Michigan Account to the Urogo Account in New York, New York.
- b. Victim-5 has not received any payment from Urogo to date.
- 22. Based upon my investigation and the interviews of investors that I have conducted, I have identified only one investor to date who has been made whole ("Victim-6") by CHARLES HUGGINS, CHRISTOPHER BUTCHKO, and ANNE THOMAS, the defendants. Victim-6, however, received the principal of his investment from JYork only after he retained counsel and threatened JYork with civil litigation. I likewise have identified only one investor, Victim-4, who received any gold or diamonds from HUGGINS, BUTCHKO, and THOMAS. As discussed above, Victim-4, a renowned former professional athlete, received diamonds from HUGGINS only after Victim-4 retained counsel. In any event, Victim-4 determined that the diamonds were worth far less than the money that he had invested and returned them to JYork.

Analysis Of The Defendants' Bank Records

23. Based on my review of bank records for the JYork and Urogo Accounts, I have learned the following:

- a. CHARLES HUGGINS and ANNE THOMAS, the defendants, in their capacities as JYork's president and vice president, respectively, are the signatories of the JYork Account. THOMAS, in her capacity as Urogo's vice president, is the signatory of the Urogo Account.
- b. Between in or about June 2008 and in or about September 2011, investors wired or otherwise deposited approximately \$2.5 million into the JYork and Urogo Accounts.
- c. Of the funds that investors wired or deposited into the JYork and Urogo Accounts, approximately \$146,000 was paid out of those accounts to other investors, including Victim-6, who, as noted above, was repaid the principal of his investment only after he threatened litigation. Of the \$146,000, a majority was repaid to one investor who actively solicited other investors.
- d. Of the funds that investors wired or deposited into the JYork and Urogo Accounts, approximately \$413,000 was wired from those accounts to a personal account controlled by HUGGINS in Africa (the "HUGGINS Account"). Of the \$413,000, approximately \$120,800 was wired back into the JYork and Urogo Accounts from the HUGGINS Account.
- e. Of the funds that investors wired or deposited into the JYork and Urogo Accounts, a majority was misappropriated by CHARLES HUGGINS, CHRISTOPHER BUTCHKO, and ANNE THOMAS, the defendants, for their own personal benefit and for purposes entirely unrelated to what was represented to investors. For example:
- i. HUGGINS diverted approximately \$47,000 to pay the monthly rent on his apartments in the Sutton Place section of Manhattan and Edgewater, New Jersey.
- ii. Approximately \$297,000 was diverted to businesses that were unrelated to JYork and Urogo, including Orpheus Inc., a record label owned by HUGGINS, and VASNC Pvt Ltd., a petroleum company owned by BUTCHKO.
- iii. On a number of occasions, investor funds were further diverted to pay HUGGINS's, BUTCHKO's, and THOMAS's personal expenses, including credit card, cable television, and

Based upon interviews that I and other federal agents have conducted, I have been able to identify approximately 20 victim investors who transferred money to the JYork and Urogo Accounts based upon their understanding that they were providing money to JYork or Urogo for the purpose of investing in gold or diamonds.

telephone bills, department store purchases, restaurant tabs, and payments relating to luxury automobiles.

iv. Approximately \$31,500 in cash was withdrawn from ATMs.

- v. ANNE THOMAS, the defendant, personally received approximately \$90,500 in cash and checks from the JYork and Urogo Accounts.
- f. ANNE THOMAS, the defendant, issued more than 100 checks and wire transfers from the JYork and Urogo Accounts to Individual-1 of approximately \$831,500, representing the proceeds of investor funds. Individual-1 cashed or deposited those checks into a separate account. THOMAS directed the wire transfers to an account controlled by Individual-1 in the Bahamas. On dozens of occasions from in or about 2008 through 2010, THOMAS issued checks to Individual-1 in amounts of \$10,000 or less. For example:
- i. On or about October 15, 2008, THOMAS issued a check from the JYork Account made payable to Individual-1 in the amount of \$8,000, which Individual-1 cashed in New York, New York.
- ii. On or about October 16, 2008, THOMAS issued a check from the JYork Account made payable to Individual-1 in the amount of \$9,000, which Individual-1 cashed in New York, New York.
- iii. On or about March 12, 2009, THOMAS issued a check from the JYork Account made payable to Individual-1 in the amount of \$7,400, which Individual-1 cashed in New York, New York.
- iv. On or about March 13, 2009, THOMAS issued a check from the JYork Account made payable to Individual-1 in the amount of \$6,500, which Individual-1 cashed in New York, New York.
- g. I know from my training and experience that transactions exceeding \$10,000 in currency create a reporting requirement. Based upon that same training and experience, I believe that THOMAS's repeated issuance of checks in the manner described above constitutes "structuring."

WHEREFORE, the deponent prays that an arrest warrant be issued for CHARLES HUGGINS, CHRISTOPHER BUTCHKO, and ANNE THOMAS, the defendants, and that they be imprisoned or bailed as the case may be.

MATTHEW B. TAYLOR

SPECIAL AGENT

FEDERAL BUREAU OF INVESTIGATION

Sworn to before me this 4th day of February 2013

THE HONORABLE DEBRA FREEMAN UNITED STATES MAGISTRATE JUDGE

SOUTHERN DISTRICT OF NEW YORK

WARRANT FOR ARREST

Hnited States District Court		SOUTHERN DISTRICT OF NEW YORK						
UNITED STATES OI	F AMERICA	DOCKET NO.		MAGISTRATE'S CASE NO.				
V. CHARLES HUGGINS, CHRISTOPHER BUTCHKO, a	nd	13 Mag.	2 C	BE ARRESTED				
ANNE THOMAS, Defend	CHARLES HUGGINS							
WARRANT ISSUED ON THE BASIS OF: ☐ Indictment ☐ Information >	DISTRICT OF ARREST							
TO: United States Marshal or Any Oth	СПУ							
YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the United States District Court to answer to the charge(s) listed below.								
	DESCRIPTION O	F CHARGES						
	Conspiracy to commit w	vire iraud; wir	re iraud					
IN VIOLATION OF	UNITED STATES CODE TI 18	TLE	SECTION 1349, 1343					
	ELEASE							
ORDERED BY Debra Freeman United States Magistrate	DGE/U.S. MAGISTRATE) DATE ORDERED							
CLERK OF COURT DISTRICT OF New	·		DATE ISSUED					
RETURN								
This warrant was received and executed with the arrest of the above-named person.								
DATE RECEIVED	NAME AND TITLE OF ARRESTING OF	FICER	FICER SIGNATURE OF ARRESTING OFFICER					
DATE EXECUTED								

Note: The arresting officer is directed to serve the attached copy of the charge on the defendant at the time this warrant is executed.

WARRANT FOR ARREST

United States Di	strict Court	SOUTHERN DISTRICT OF NEW YORK						
UNITED STATES (OF AMERICA	13 Mag. MAGISTRATE'S CASE NO.						
CHARLES HUGGINS, CHRISTOPHER BUTCHKO, a ANNE THOMAS, Defen		NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED CHRISTOPHER BUTCHKO						
WARRANT ISSUED ON THE BASIS OF:	☐ Order of Court							
☐ Indictment ☐ Information	X Complaint	DISTRICT OF ARREST						
TO: United States Marshal or Any O1	THER AUTHORIZED OFFICER	CITY						
YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the United States District Court to answer to the charge(s) listed below.								
	DESCRIPTION O	OF CHARGES						
Conspiracy to commit wire fraud; wire fraud								
IN VIOLATION OF	united states code ti 18	SECTION 1349, 1343						
	BAIL OTHER CONDITIONS OF R	ELEASE	A 10					
Debra Freeman ORDERED BY United States Magistrate Southern District of Ne	e Judge SIGNATURE (FEDERAL)JUI	DGE/U.S. MAGISTRATE						
CLERK OF COURT (BY) DEPUTY CLERK			DATE ISSUEI	D				
RETURN								
This warrant was received and executed with the arrest of the above-named person.								
DATE RECEIVED	NAME AND TITLE OF ARRESTING O	FFICER	SIGNATURE OF ARRESTING OFFICER					
DATE EXECUTED								

Note: The arresting officer is directed to serve the attached copy of the charge on the defendant at the time this warrant is executed.

WARRANT FOR ARREST

United States District Court			SOUTHERN DISTRICT OF NEW YORK				
UNITED STATES O)F AN	MERICA	DOCKET NO.		MAGIST	RATE'S CASE NO.	
v.			13 Mag	ENS OF THE PARTY AND IN		901	
CHARLES HUGGINS, CHRISTOPHER BUTCHKO, a ANNE THOMAS,	ınd		NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED				
Defendants.			ANNE THOMAS				
WARRANT ISSUED ON THE BASIS OF: ☐ Order of Court☐ Indictment☐ Information☐ X Complaint☐							
			DISTRICT OF ARREST				
TO: United States Marshal or Any Oti	HER A	UTHORIZED OFFICER	CITY				
YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the United States District Court to answer to the charge(s) listed below.							
		DESCRIPTION O	F CHARGES				
	onsp	iracy to commit wire	fraud; money I	laundering			
IN VIOLATION OF UNITED STATES CODE T 18		UNITED STATES CODE TO 18	TLE	section 1349, 1956			
BAIL OTHER CONDITIONS OF R			ELEASE				
United States Magistrate Judge Southern District of New York		SIGNATURE (FEDERAL JUDGE/U.S. MAGISTRATE (BY) DEPUTY CLERK		TE)		DATE ORDERED EB042013 DATE ISSUED	
RETURN							
This warrant was received and executed with the arrest of the above-named person.							
DATE RECEIVED	NAME AND TITLE OF ARRESTING OF		FFICER	SIGNATURE OF ARI	RESTING	G OFFICER	
DATE EXECUTED							

Note: The arresting officer is directed to serve the attached copy of the charge on the defendant at the time this warrant is executed.