

Approved: ELISHA KOBRE  
Assistant United States Attorney

14 MAG 2696

Before: HONORABLE FRANK MAAS  
United States Magistrate Judge  
Southern District of New York

- - - - - x  
: SEALED COMPLAINT  
UNITED STATES OF AMERICA :  
: Violation of  
- v. - : 18 U.S.C. § 1349  
:   
ALLAH JUSTICE MCQUEEN, : COUNTY OF OFFENSE:  
a/k/a "D," : BRONX  
:   
Defendant. :  
:   
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

CONOR O'SULLIVAN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation (the "FBI"), and charges as follows:

Count One

(Conspiracy to Commit Wire Fraud)

1. In or about August 2013, in the Southern District of New York and elsewhere, ALLAH JUSTICE MCQUEEN, a/k/a "D," the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that ALLAH JUSTICE MCQUEEN, a/k/a "D," the defendant, and others known and unknown, willfully and knowingly, 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, would and did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, and sounds for the purpose of executing such scheme and artifice to

defraud, 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 August 23, 2013, ALLAH JUSTICE MCQUEEN, a/k/a "D," the defendant, and his co-conspirators caused a victim in the Bronx, New York, to send approximately \$1,900 via MoneyGram to an individual in Brooklyn, New York.

b. On or about August 26, 2013, MCQUEEN deposited into his bank account a check in the amount of \$1,445 representing a portion of the fraudulent proceeds obtained from a different victim.

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

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

4. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have been an FBI Special Agent since 1996 and I am assigned to a White Collar Fraud squad within the New York Division. As part of my work at the FBI, I have received training regarding consumer and telemarketing fraud and white collar crimes. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, including my examination of reports and records, interviews I have conducted, and conversations with other law enforcement officers and other individuals. 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, unless noted otherwise.

#### OVERVIEW OF THE SCHEME TO DEFRAUD ELDERLY VICTIMS

5. As set forth below, this investigation has revealed that ALLAH JUSTICE MCQUEEN, a/k/a "D," the defendant, and his co-conspirators, have perpetrated a scheme to defraud

elderly grandparents around the United States by tricking them into believing their grandchildren have been imprisoned and need immediate bail money. In particular, in each case, a member of the conspiracy contacted the victim by phone, purported to be a law enforcement official or attorney, and falsely claimed that the victim's grandchild had been taken into custody for a narcotics offense and would not be released unless the victim paid thousands of dollars (and in some cases tens of thousands of dollars) in purported bail money. A member of the conspiracy also frequently posed on the call as the victim's grandchild, typically crying and pleading with the elderly victim to send money to secure the grandchild's release from jail, and asking the victim not to contact any other family members because the grandchild felt ashamed. In each case, in extreme distress, the victim has sent thousands of dollars, at a minimum, as instructed, to certain individuals who, among other things, have provided that money to MCQUEEN at his direction. In each case, after paying the "bail" money as directed, the victim has directly contacted his or her grandchild and thereupon learned that the grandchild had not, in fact, been arrested, that the grandchild knew nothing about the claims made on the call to the victim, and that the call appeared to be fraudulent.

6. Through his participation in this scheme, ALLAH JUSTICE MCQUEEN, a/k/a "D," the defendant, and his co-conspirators defrauded at least seventeen elderly victims, including a victim in the Bronx, New York, and others throughout the United States, in the amount of more than \$170,000.

#### **THE FRAUDULENT PHONE CALLS TO VICTIMS**

7. From speaking with another special agent with the FBI (the "Agent"), I learned that the Agent spoke with a particular individual who is about 87 years old and resides in the Bronx, New York ("Victim-1"). From Victim-1, the Agent learned, among other things, the following.

a. In or about August 2013, Victim-1 received a phone call from an individual who identified himself as a police officer from Westchester County (the "Purported Police Officer"). The phone call was from a number with a "438" area code - an area code assigned to Montreal, Canada. The Purported Police Officer told Victim-1 that Victim-1's granddaughter was a passenger in a car that was stopped for speeding and found to contain drugs; that Victim-1's granddaughter had been arrested and charged with drug possession; and that blood samples taken

from the granddaughter were tested and found to be negative for drugs.

b. The Purported Police Officer then told Victim-1 that he was handing the phone to "Gregory Onus," who the Purported Police Officer said was a lawyer (the "Purported Lawyer"). Another individual, who identified himself as the Purported Lawyer, then told Victim-1 that he was representing Victim-1's granddaughter and would arrange for the release of Victim-1's granddaughter pending receipt of bail money. A female, who was crying but sounded to Victim-1 like Victim-1's granddaughter, then got on the phone and told Victim-1 to send bail money but not tell anyone about the situation as she was very embarrassed. The Purported Lawyer then got back on the phone and directed Victim-1 to send \$10,000 via MoneyGram to various individuals in five separate installments.<sup>1</sup>

c. From my review of a document prepared by a detective of the New York City Police Department ("NYPD") who also spoke with Victim-1, I know that two of the individuals to whom Victim-1 was directed to send money ("Individual-1" and "Individual-2") were located in Houston, Texas. A third individual to whom Victim-1 was directed to send money was located in Brooklyn, New York; as further described below, this individual subsequently provided information to the Government in this investigation ("CW-1").<sup>2</sup>

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<sup>1</sup> From reviewing records provided by MoneyGram, I learned the following: Money may be sent and received via MoneyGram at many retail locations. To send money via MoneyGram, the sender must present a form of identification and a completed "Send Form" (including the sender's name and address, the intended recipient's name and location, and the amount of money to be transferred to the recipient) along with the money to be sent and a transfer fee. The sender then receives a unique reference number that must be provided to the intended recipient. To receive the funds, the recipient must, in turn, provide the unique reference number, a form of identification, and a completed "Receiver Form" including the recipient's name, address, and home phone number, the sender's name and phone number, the city and state from which the transaction was sent, and the amount of money to be received. The Receiver Form also reflects the recipient's "Government Issued ID# and Type."

<sup>2</sup> Information provided by CW-1 in this investigation has proven reliable and has been corroborated by, among other things, phone records and financial records.

d. Victim-1 conducted the MoneyGram transfers requested by the Purported Lawyer from a particular location in the Bronx, New York, near Victim-1's home. From reviewing records of those transfers, I learned that Victim-1 sent about \$7,400 to Individual-1, \$2,950 to Individual-2, and \$1,900 to CW-1, for a total, excluding transfer fees, of about \$12,250.

e. After sending the money as directed, Victim-1 spoke with Victim-1's granddaughter and learned that the granddaughter had never been arrested, knew nothing about the Purported Lawyer or the basis of his request for bail money, and that the request for bail money was fraudulent.

8. From speaking with the Agent, I learned that the Agent spoke with another individual who is about 79 years old and resides in New York State ("Victim-2"). From Victim-2, the Agent learned, among other things, the following.

a. In or about August 2013, Victim-2 received a phone call from someone identifying himself as "Sergeant Louis Meyers" (the "Purported Sergeant"). The Purported Sergeant claimed that Victim-2's grandson had been arrested and jailed after drugs were found in a car in which Victim-2's grandson had been a passenger and that Victim-2's grandson could be released on bail if Victim-2 posted bail money. An individual who sounded like Victim-2's grandson then spoke briefly with Victim-2.

b. The Purported Sergeant directed Victim-2 to send about \$6,000 in three separate wire transfers, two via MoneyGram in the amount of \$2,100 each, and one via Western Union in the amount of \$1,500. The Purported Sergeant directed that the transfers be made, respectively, to a particular individual ("CC-1"), to CW-1, and to a particular individual located in New York, New York ("Individual-3"). Victim-2 sent the three wire transfers as directed, a fact I have confirmed through review of the relevant wire transfer records.

c. After Victim-2 sent the three wires as directed, the Purported Sergeant called Victim-2 again and claimed that Victim-2's grandson required an additional \$18,000 in bail money but that the Purported Sergeant could arrange for that payment. The Purported Sergeant said Victim-2 would receive two checks, each in the amount of \$9,000, from a particular Long Island-based individual ("Victim-3"). The Purported Sergeant further directed Victim-2 to deposit those

checks into Victim-2's own bank account, leave the money there for seven days, and then wire the money to a particular bank account at a particular Peruvian bank.

d. On or about August 29, 2013, Victim-2 received two checks - each in the amount of \$9,000 - listing Victim-3 as the payor. Victim-2 complied with the Purported Sergeant's instructions and wired that money as he had directed. Several weeks later, Victim-2 called the Purported Sergeant at the telephone number he had previously provided to Victim-2, which had area code "438." The Purported Sergeant assured Victim-2 that Victim-2's grandson would soon be released.

e. Victim-2 then became suspicious, called Victim-2's grandson directly, and thereupon learned that the grandson had not been arrested, knew nothing about the Purported Sergeant or the basis of his request for bail money, and believed Victim-2 had been the victim of a fraud.

9. From the Agent, I learned that the Agent spoke with Victim-3, an 83 year-old individual who resides in New York State. From Victim-3, the Agent learned, among other things, the following.

a. On or about August 26, 2013, Victim-3 received a phone call from someone Victim-3 believed was Victim-3's grandson. The purported grandson, who was crying, told Victim-3 that he had been arrested for drug possession and begged Victim-3 not to tell anyone because he was embarrassed and could be in danger. An individual identifying himself as the Purported Sergeant then got on the phone, claimed that Victim-3's grandson had been arrested after drugs were discovered in a car in which he was a passenger, and said that the grandson would be released if Victim-3 sent bail money.

b. The Purported Sergeant directed Victim-3 to send two checks, each in the amount of \$9,000 and payable to Victim-2, to a particular address which, based upon information that Victim-2 provided to the Agent, I understand to be Victim-2's address. Victim-3, who did not know Victim-2, sent the checks as directed. Prior to doing so, Victim-3 told the Purported Sergeant that the money had been set aside for Victim-3's kidney surgery, as Victim-3 had been in poor health. The Purported Sergeant assured Victim-3 that the money would be returned to Victim-3 once Victim-3's grandson's case was resolved.

c. Victim-3 subsequently spoke with Victim-3's grandson directly, and learned that Victim-3 had not been arrested, and knew nothing about the Purported Sergeant or the basis for his request for bail money. Victim-3 never received any money back from the Purported Sergeant.

10. From the Agent, I learned that the Agent spoke with another individual who is about 86 years old and resides in New York State ("Victim-4"). From Victim-4, the Agent learned, among other things, the following.

a. On or about August 13, 2013, Victim-4 received a call from someone purporting to be - and who sounded like - Victim-4's grandson. The person purporting to be Victim-4's grandson told Victim-4 that he had been arrested after a car in which he was a passenger was found by the police to contain drugs. Another individual then got on the phone, identified himself as "Detective David Green" (the "Purported Detective"), and told Victim-4 that bail money was required in order for Victim-4's grandson to be released from custody. The Purported Detective told Victim-4 to pay a total of about \$50,000 according to particular instructions he provided, which he promised would be refunded to Victim-4 once Victim-4's grandson was released.

b. Based upon receipts and other documents provided by Victim-4, and bank and money transfer records that I have reviewed, I learned that, over the next several days after receiving the call from the Purported Detective, Victim-4 sent over \$50,000 to various individuals as directed through a combination of money transfers and deposits into various bank accounts. Among other payments, as directed, Victim-4 sent \$1,900 via MoneyGram to a particular individual in Brooklyn, New York who, as set forth below, later provided information to the Government in this investigation ("CW-2").<sup>3</sup>

c. Among other payments made as directed by the Purported Detective, on or about August 24, 2013, Victim-4 deposited \$8,000 in cash into a particular bank account in the name of CC-1 ("CC-1's Account"). A withdrawal slip also dated August 24, 2013, and signed in CC-1's name, shows that CC-1 withdrew \$7,500 from CC-1's Account that same day.

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<sup>3</sup> Information provided by CW-2 has proven accurate and reliable and has been corroborated by, among other things, phone records and financial records.

11. From my conversation with an individual, who is about 83 years old and resides in New York State ("Victim-5"), I learned the following. In or about August 2013, Victim-5 received a phone call from a person who identified himself as Victim-5's grandson. The purported grandson told Victim-5 that he had been arrested after police found marijuana in a car in which he was a passenger and begged Victim-5 not to tell his parents. A person identifying himself as a "state trooper" then got on the phone and told Victim-5 to send \$1,900 via MoneyGram for Victim-5's grandson's bail. The "state trooper" directed that the money be sent to a particular individual. Victim-5 complied. The following day, the "state trooper" called Victim-5 again and claimed that a judge had ruled that an additional \$1,900 in bail money was required and that Victim-5 should send the money via MoneyGram to CW-2. Again, Victim-5 complied. Victim-5 later spoke with Victim-5's grandson and learned that he had not been arrested, that he was home all weekend, that he knew nothing about the purported "state trooper" or his basis for seeking bail money, and that the calls had been fraudulent.

12. From my conversation with an individual, who is 91 years old and resides in New York State ("Victim-6"), I learned the following: In or about August 2013, Victim-6 received a phone call from a person purporting to be a law enforcement officer who claimed that Victim-6's grandson had been arrested and who instructed Victim-6 to send two MoneyGram transfers of \$1,900 each to CW-2. Victim-6 sent the money, as directed, on two consecutive days in August 2013. Victim-6's son learned what had happened, realized that Victim-6 had been the victim of a baseless and fraudulent request for money, and stopped the second transfer before it was completed.

13. From my conversation with a 79 year-old individual who resides in New York State ("Victim-7"), I learned the following: In or about August 2013, Victim-7 received a phone call from an individual who was crying and identified himself as Victim-7's grandson. The caller, who also sounded like Victim-7's grandson, told Victim-7 that he had been arrested after the car in which he was an occupant was found to contain drugs. The purported grandson told Victim-7 that he needed bail money and begged Victim-7 not to tell anyone, especially the grandson's parents. An individual who identified himself as the Purported Sergeant then got on the phone and directed Victim-7 to send bail money in the amount of \$1,900 via MoneyGram from a particular store to CW-2. Victim-7 attempted to conduct the transaction at the store but the store declined to accept it. Victim-7 called the Purported Sergeant back at



the number he provided - which had a "438" area code, like the phone numbers given to Victim-1 and Victim-2. The Purported Sergeant told Victim-7 to send the money from another particular store, which Victim-7 did. Victim-7 later spoke with Victim-7's grandson and learned that he had not been arrested, that he knew nothing about the Purported Sergeant or the basis for his request for bail money, and that the calls had been fraudulent.

#### **MCQUEEN OBTAINS PROCEEDS OF THE FRAUD**

14. From CW-2, and from my review of reports prepared by the Agent based upon the Agent's meetings with CW-2, I know, among other things, the following:

a. CW-2 became friends with CC-1 in or about early 2013, after which CW-2 learned that CC-1 was in a relationship with someone CC-1 referred to as "D." Through CC-1, CW-2 met D on several occasions. CW-2 has identified a photograph of ALLAH JUSTICE MCQUEEN, a/k/a "D," the defendant, as "D."

b. On or about August 23, 2013, CC-1 asked CW-2 to pick up some money as a favor because, CC-1 claimed, CC-1 was not in the area at the time. CC-1 claimed that the money to be picked up was coming from MCQUEEN's job and would be transferred via Western Union. CC-1 claimed that checks for MCQUEEN normally go into CC-1's bank account but that CC-1's bank account was closed and CC-1 needed someone to pick up MCQUEEN's money. From my review of CC-1's Account records, I learned that, contrary to CC-1's claim, (1) CC-1's Account was active in August 2013; and (2) no checks or wires payable to MCQUEEN had previously been deposited into CC-1's Account.

c. CW-2 agreed to pick up the money for CC-1, who said MCQUEEN would pick up CW-2 at a particular time and location to transport CW-2 to pick up the money. CC-1 directed CW-2 to bring CW-2's ID.

d. As arranged, MCQUEEN subsequently drove CW-2 to pick up the money at particular MoneyGram store in Brooklyn, New York. During the car ride, CW-2 asked MCQUEEN why he couldn't have the money sent directly to him. MCQUEEN responded that it was because he did not have identification. As set forth below, from CW-1 and from my review of bank records and records of the New York State Department of Motor Vehicles, I learned that MCQUEEN's claim was false and that, in fact,

MCQUEEN possessed a driver's license which he produced and used at or about that time as identification.

e. Upon arriving at their destination, MCQUEEN handed CW-2 two MoneyGram "Receiver" forms which I have learned, based upon my review of copies of the forms and other transaction records, listed the names and phone numbers of Victim-6 and Victim-7, respectively, the unique MoneyGram reference number that had been provided to each of those victims, respectively, when they transferred the fraudulently obtained proceeds as directed and described above, and the "receive amount" of \$1,900. CW-2 signed each of the forms, provided them to the MoneyGram agent, and retrieved a total of about \$3,800 in cash. Upon returning to the car, CW-2 gave this entire sum of cash to MCQUEEN. During the ride back, MCQUEEN claimed that CC-1 usually receives the money in CC-1's bank account. Based upon my review of CC-1's Account and a bank account held by MCQUEEN, I have learned that this was false because MCQUEEN received payments from his employer into his own bank account and did not receive payments in CC-1's Account.

f. The following day, on or about August 24, 2013, CC-1 asked CW-2 to pick up money again, and CW-2 agreed to do so. MCQUEEN again drove CW-2 to a particular MoneyGram store in Brooklyn, where MCQUEEN handed CW-2 another "Receiver" form which I learned, based upon my review of a copy of the form and other transaction records, listed the name and phone number of Victim-5, the unique reference number that had been provided to Victim-5 when Victim-5 transferred the fraudulently obtained proceeds as directed and described above, and the "receive amount" of \$1,900. CW-2 signed the form, provided it to the MoneyGram agent, and received \$1,900 cash which CW-2 gave to MCQUEEN.

g. Later that same day, August 24, 2013, CC-1 called CW-2 and said that MCQUEEN had money from one more MoneyGram "from his job" that needed to be picked up. CW-2 agreed to pick up this money. Later that day, MCQUEEN drove CW-2 to a MoneyGram store in Brooklyn, where MCQUEEN handed CW-2 another "Receive" form which I learned, based upon information from CW-2, and my review of a copy of the form, and other transaction records, listed the name and phone number of Victim-4, the unique reference number that had been provided to Victim-4 when Victim-4 transferred the fraudulently obtained proceeds as directed and described above, and the "receive amount" of \$1,900. CW-2 signed the form, provided it to the MoneyGram agent, and received \$1,900 cash which CW-2 gave to MCQUEEN.

15. From CW-1, and from reviewing wire transfer records, I learned, among other things, the following:

a. On or about August 23, 2013, the same date on which CC-1 had claimed to CW-2 that CC-1 was not in the Brooklyn area, CC-1 called CW-1 and said CC-1 was coming shortly to CW-1's residence in Brooklyn to pick up CW-1. After arriving by car, CC-1 stated that CC-1 needed CW-1 to receive a money transfer which, CC-1 claimed, CC-1 could not pick up because CC-1 did not have any identification. Contrary to CC-1's claim, based upon my review of a bank signature card for an account in the name of CC-1, I have learned that, in or about 2008, CC-1 was issued a New York State identification card with an expiration date in 2016. From MoneyGram transaction records, I also learned that, on or about the following day, August 24, 2013, CC-1 presented CC-1's New York State identification card at a MoneyGram store in Brooklyn, New York, and received \$1,945 that had been sent to CC-1 by Victim-2.

b. After CW-1 agreed to pick up the money, CC-1 drove CW-1 to a particular retail store authorized to conduct MoneyGram transactions. There, CC-1 provided CW-1 with a unique reference number which I learned, based upon my review of transaction records, had been provided by MoneyGram to Victim-2 to be given to the intended recipient of Victim-2's payment of approximately \$1,945 as described above. Thereafter, a store clerk informed CC-1 and CW-1 that the store would not pay the entire \$1,945 in cash, but could provide \$500 in cash and the remainder by check.

c. CC-1 argued unsuccessfully with the store clerk that the amount of the entire wire should be paid in cash, whereupon CC-1 called ALLAH JUSTICE MCQUEEN, a/k/a "D," the defendant, by phone. Shortly thereafter, MCQUEEN arrived at the store and directed CW-1 to complete the transaction, receiving \$500 cash and a check from the store. Based upon my review of records from a particular bank, I learned that the check was made payable to CW-1 in the amount of \$1,445 and also listed the unique MoneyGram reference number initially provided to Victim-2. CW-1 handed the cash and check to CC-1.

d. On or about the following day, CC-1 again picked up CW-1 and, in an attempt to cash the check, drove CW-1 to two different check cashing establishments. Both of these locations declined to cash the check.

e. On a subsequent day soon thereafter, CC-1 called CW-1 and said that MCQUEEN would take CW-1 to deposit the check. MCQUEEN thereafter drove CW-1 to a particular branch of a bank ("McQueen's Bank") in Brooklyn. There, CW-1 endorsed the check and MCQUEEN showed his driver's license to the teller. MCQUEEN endorsed the check and deposited the check into an account.

f. Based upon my review of records of McQueen's Bank, I learned that MCQUEEN deposited the check into his own bank account and that the back of the check reflects, among other things, handwritten notations listing a particular New York State driver's license number (the "NYDL Number") and two signatures. Based upon my review of records from the New York State Department of Motor Vehicles, I know that the NYDL Number is assigned to MCQUEEN.

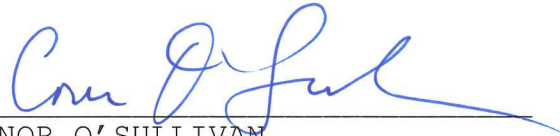
g. On or about August 25, 2013, CC-1 asked CW-1 to pick up the proceeds of another MoneyGram wire transfer. CW-1 asked CC-1 where the money was coming from. CC-1 replied, in substance, that CW-1 should not worry about it and that "it was cool."

h. CC-1 drove CW-1 to a particular MoneyGram store in Brooklyn. Upon arriving at the store, CC-1 provided CW-1 with a handwritten slip of paper listing the name of Victim-1, a phone number for Victim-1, and Victim-1's Bronx, New York location. CW-1 used this information to complete a MoneyGram "Receive" form. Upon presenting the completed form at that location, CW-1 received \$1,900 cash, which CW-1 gave to CC-1. CC-1 then gave CW-1 \$100.

#### **ADDITIONAL VICTIMS OF THE SCHEME TO DEFRAUD**

16. From my conversations with additional elderly victims ("Victim-8" through "Victim-17") of the scheme, and from my review of reports prepared by the Agent, I learned that each of these victims received one or more phone calls, similar in substance to those described above, in which each of the victims was falsely told that his or her grandchild or child was arrested and needed bail money which was to be transmitted by wire transfers and other particular means to various individuals. Each of these victims wired money, as directed, in amounts ranging from \$1900 to more than \$15,000, to Individuals-1, -2, and/or -3, among others. These victims reside variously in Colorado, Texas, Washington, California, Illinois, and New York.

WHEREFORE, deponent prays that an arrest warrant be issued and ALLAH JUSTICE MCQUEEN, a/k/a "D," the defendant, be imprisoned or bailed, as the case may be.



CONOR O'SULLIVAN,  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me this  
2nd day of December 2014



HONORABLE FRANK MAAS  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

# UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America  
v.  
ALLAH JUSTICE MCQUEEN,  
a/k/a "D,"

Case No.

14 MAG 2696

Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) ALLAH JUSTICE MCQUEEN, a/k/a "D,"

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☒ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to Commit Wire Fraud, Title 18, United States Code, Section 1349

Date: 12/02/2014

S/ Frank Maas  
Issuing officer's signature

City and state: New York, New York

Honorable Frank Maas, United States Magistrate Judge  
Printed name and title

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title