

FTB:PP/ADG
F.#2021R01102

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C., § 666)

MONICA COAXUM AND
EDUARDO TRINIDAD,

22-MJ-1203

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

JEFFREY DOWNEY, being duly sworn, deposes and states that he is a
Special Agent with the Federal Bureau of Investigation, duly appointed according to law and
acting as such.

In or about and between March 2021 and April 2022, both dates being
approximate and inclusive, within the Eastern District of New York and elsewhere, the
defendant MONICA COAXUM, being an agent of an organization that received in a one
year period benefits in excess of \$10,000 under a Federal program involving a grant,
contract, subsidy, loan, guarantee, insurance and other form of Federal assistance: to wit, the
New York City Department of Correction, did knowingly and intentionally embezzle, steal,
obtain by fraud and otherwise without authority knowingly convert to her own use and
intentionally misapply property, in connection with business and one or more transactions

and series of transactions of such organization involving things of value of \$5,000 or more, to wit: New York City Department of Correction funds.

(Title 18, United States Code, Section 666(a)(1)(A)).

In or about and between June 2021 and October 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant EDUARDO TRINIDAD, being an agent of an organization that received in a one year period benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance and other form of Federal assistance: to wit, the New York City Department of Correction, did knowingly and intentionally embezzle, steal, obtain by fraud and otherwise without authority knowingly convert to his own use and intentionally misapply property, in connection with business and one or more transactions and series of transactions of such organization involving things of value of \$5,000 or more, to wit: New York City Department of Correction funds.

(Title 18, United States Code, Section 666(a)(1)(A)).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2021. I am currently assigned to an FBI squad focused on public corruption. I am familiar with the facts and circumstances of this investigation from my

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

personal participation in the investigation, review of documents and discussions I have had with other law enforcement personnel. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

I. Background

2. Since late 2021, the FBI and the New York City Department of Investigation (“DOI”) have been investigating correction officers with the New York City Department of Correction (“DOC”) who have been fraudulently obtaining a salary while not working, often for over a year. These correction officers have committed fraud by abusing DOC sick leave policies to avoid work, falsely claiming they were too injured or sick to work, making false statements to the DOC regarding how they spend their time and, in some cases, submitting false documentation to the DOC regarding medical appointments they did not attend.

3. The DOC manages all New York City jails, including Rikers Island. Currently, approximately 5,600 individuals are incarcerated at DOC facilities. The DOC receives benefits in excess of \$10,000 per year under various federal government programs.

4. DOC correction officers, including the defendants MONICA COAXUM and EDUARDO TRINIDAD, work at jails managed by the DOC. As set forth in their union contracts, DOC officers have unlimited paid sick leave “for the full period of any incapacity due to illness, injury or mental or physical defect, whether or not service-connected.” If an officer needs to be on medical leave for more than two consecutive days, the officer must report to the DOC’s Health Management Division (“HMD”), at which time the officer may or may not be given a return date depending on the officer’s circumstances.

While paid sick leave is unlimited, DOC rules and regulations require that, if a correction officer has been on sick leave for more than eight days in the calendar year, the officer cannot leave his or her residence while on sick leave outside of the hours 1:00 p.m. to 5:00 p.m. for any purpose other than a medical appointment unless he or she otherwise received authorization from HMD. If an officer wishes to leave his or her residence for a medical appointment outside of these hours, the officer must “log out” by calling the DOC prior to leaving the officer’s residence, as well as calling the DOC upon returning home from the appointment. The officer must also submit documentation to the DOC within 48 hours demonstrating that the officer actually went to a medical appointment outside of the hours of 1:00 p.m. to 5:00 p.m. I understand from speaking with a representative of the HMD that these restrictions are meant to ensure that correction officers who report that they are too sick or injured to work for a lengthy period of time do not abuse sick leave policy by failing to return to work when the officers are medically able to do so.

5. According to DOC policy, if a DOC officer has an illness or injury that prevents the officer from being physically able to guard incarcerated individuals, that officer can, if medically able, work on medically modified duty, such as by performing administrative duties.

6. In connection with this investigation, agents have, among other things, reviewed medical, financial, personnel and cell phone records; conducted surveillance; and interviewed witnesses, including medical providers.

II. The Defendants Monica Coaxum and Eduardo Trinidad

7. The defendants MONICA COAXUM and EDUARDO TRINIDAD are engaged and have been in a romantic relationship since approximately 2020.²

III. The Defendant Monica Coaxum's Federal Program Fraud

8. The defendant MONICA COAXUM is a resident of Harrison, New York. COAXUM has been a correction officer with the DOC since approximately December 2016. COAXUM was on sick leave between approximately March 2021 and May 2022, during which time she collected a full salary.

9. As set forth below, there is probable cause to believe that the defendant MONICA COAXUM fraudulently received more than \$80,000 in salary by failing to abide by DOC sick leave policies, claiming she was too injured or sick to work when she was in fact able to work, making false reports to the DOC and submitting to DOC fraudulent medical notes stating that she was at physical therapy appointments which she never attended.

10. Subpoenaed medical and DOC records report that, in approximately February 2019, the defendant MONICA COAXUM had a work accident that resulted in injuries to her left shoulder, left elbow and left wrist. Then, in approximately June 2019, COAXUM was involved in a car accident and sustained an injury to her left knee. Due to the car accident, in approximately September 2019, COAXUM underwent surgery on her left knee. After the surgery and following some sick leave, COAXUM returned to work the

² According to their wedding website, the defendants met in 2020 and are scheduled to get married in July 2023.

following month. On or about August 4, 2020, the orthopedic surgeon who treated COAXUM for her left knee injury discharged her from his care, after having found in prior appointments that COAXUM had reached “maximum medical improvement.”³ On or about August 7, 2020, a different orthopedic surgeon hired by the DOC found that COAXUM had reached “maximum medical improvement” for her February 2019 work injuries. Following this medical evaluation, on or about October 18, 2020, COAXUM returned to regular duty.

11. Just one month later, in November 2020, the defendant MONICA COAXUM claimed to have slipped and fallen in an elevator at work, thereby injuring her right knee, right shoulder, right elbow and right wrist. On or about February 17, 2021, COAXUM began seeing a new medical provider for her left knee (i.e., not the knee she supposedly injured during her claimed November 2020 work-related accident). Medical records indicate that COAXUM reported to the provider that she had ongoing pain in her left knee and that she had difficulty with activities including walking up and down “stairs, kneeling, squatting, prolonged standing and walking.”

12. In approximately March 2021, approximately four months after her alleged slip-and-fall work accident in November 2020 and nearly two years after the car accident in June 2019, the defendant MONICA COAXUM reported to the DOC that she could not work due to “trauma.”⁴ On or about April 9, 2021, COAXUM also reported being

³ Medical records show that on or about January 19, 2021, COAXUM returned to the provider regarding her injury to her left knee. The provider again found that COAXUM had reached maximum medical improvement.

⁴ According to an orthopedic surgeon hired by the government to review COAXUM’s and the defendant EDUARDO TRINIDAD’s medical records, an MRI of

sick from “flu/cold.” Between approximately late-March 2021 and May 2022, COAXUM remained out of work on sick leave. During her sick leave, COAXUM saw several medical providers for her left knee and the injuries she claimed to have suffered as a result of the November 2020 work accident. According to subpoenaed medical and DOC records, for example, on or about April 16, 2021, COAXUM reported to the doctor treating her left knee that, on a pain scale of 1 to 10, with 10 being the worst pain, her pain was at a 7; the records reflect that COAXUM and the doctor discussed undergoing a new surgery.⁵ At a July 2021 medical appointment, the medical records reflect that COAXUM again reported that she had 7-out-of-10 pain in her left knee and that she did not want to return to work until she had surgery; the records reflect that COAXUM said that she needed to delay the surgery until the end of August 2021 due to “family issues.” In approximately February 2022, the medical records indicate that COAXUM reported to the medical provider that her knee was substantially the same, but that she needed to delay surgery further for personal reasons. The records show that the surgery was rescheduled for March 17, 2022. Despite consistently alleging seven-out-of-10 pain and difficulty with regular life activities, records indicate that the surgery was repeatedly delayed until July 2022; according to records

COAXUM’s left knee from approximately April 5, 2021, shows a tear that is consistent with reinjury of the knee at some point since the initial injury, but also with ordinary wear and tear.

⁵ Medical records from a different provider, documenting a May 11, 2021 visit, indicate that COAXUM advised that she was working full-time when she was in fact not working. The medical provider’s notes similarly indicate that COAXUM advised that she was working full-time approximately three months later in June 2021, when COAXUM was also not working.

received at this time, COAXUM still has not undergone the contemplated surgery. In or about late April 2022, the DOC told COAXUM that her employment would be terminated if she did not return to work. In May 2022, COAXUM returned to regular duty work.

13. During her absence from work from March 2021 to May 2022, the defendant MONICA COAXUM fraudulently obtained a salary from the DOC by failing to abide by DOC sick leave policies, claiming she was too injured or sick to work when she was in fact able to work, and by making false reports to the DOC. While COAXUM claimed that she was too injured to work and delayed surgery, COAXUM abused the DOC “log out” system for personal activities, such as traveling to the Dominican Republic, Florida and West Virginia while claiming she was at medical appointments or at her residence. Additionally, in furtherance of the fraud, COAXUM submitted false medical notes claiming that she was at medical appointments which she never attended.

14. As explained above, correction officers such as the defendant MONICA COAXUM must “log out” and provide medical documentation to the DOC if they wish to leave their residence outside of the hours of 1:00 p.m. to 5:00 p.m. when they are on extended medical leave. Records subpoenaed from COAXUM’s health care providers show that COAXUM often did not attend appointments on days when notes she provided to the DOC stated she went to the appointments. COAXUM reported to the DOC through “log outs” that she went to Liberty Rhea Ranada Ebarle Physical Therapy (“LRRE”) located in the Bronx, New York, approximately 75 times between on or about April 6, 2021 and May 11, 2022. COAXUM provided documentation to the DOC purportedly documenting approximately 59 of these visits. However, records produced by LRRE show that

COAXUM only went to approximately six physical therapy appointments on the days she told the DOC she went to LRRE and that COAXUM had not been to LRRE since approximately September 15, 2021. Federal agents spoke to employees of LRRE, who confirmed that COAXUM has not attended physical therapy since September 2021 despite COAXUM's claiming to DOC that she attended appointments through May 2022. COAXUM provided at least 55 fraudulent notes to DOC for appointments she did not attend. According to LRRE records, COAXUM also attended approximately 22 physical therapy appointments on days that she did not tell DOC that she went to an appointment.

15. The defendant MONICA COAXUM hand-delivered the fraudulent notes to the DOC or sent emails with these fraudulent notes to a DOC email address to which DOC employees are instructed to send medical documentation in support of their requests to leave their residences for medical appointments. For example, on approximately December 1, 2021, COAXUM gave the DOC a note that stated COAXUM attended a physical therapy appointment at LRRE on November 27, 2021, a photograph of which is included below:



Phone: 718-402-5200
 Fax: 718-402-5211
 lrre.ptpc@gmail.com

November 27, 2021

To Whom It May Concern:

The patient MONICA COAXUM was seen in our office today for physical therapy treatment since 11/20/2020 for injuries she has sustained from a work-related accident on 11/14/2020.

If you have any questions, please feel free to contact me at the above phone number or e-mail.
 Thank you.

Sincerely,


 Liberty Rhea Rana Ebarle, PT, DPT
 Lic. # [REDACTED]

However, based on records provided by LRRE, COAXUM did not attend an appointment on that date and had not been seen at the practice for more than two months by the time of this alleged appointment. Therefore, there is probable cause to believe that COAXUM provided fraudulent documentation to the DOC in furtherance of her scheme to defraud New York City and abuse DOC sick leave policies.

16. Also, in the above instance, when the defendant MONICA COAXUM emailed to the DOC a note, on or about November 29, 2021, purportedly confirming that she was at a physical therapy appointment at LRRE on November 27, 2021, the note included

with the email was initially dated December 27, 2021. A DOC employee emailed COAXUM back alerting her that it was still November. The day after receiving that notification, COAXUM sent the DOC a revised note on December 1, 2021 with the date of the note indicating November 27, 2021, instead. As stated above, COAXUM did not attend physical therapy on either November 27, 2021 or December 27, 2021.

17. On or about July 6, 2022, the Honorable Cheryl L. Pollak, Chief United States Magistrate Judge for the Eastern District of New York, signed a search warrant for historical cell-site location information for the defendant MONICA COAXUM's cellphone for 12 dates when it appears she submitted fraudulent notes to the DOC stating she had an appointment at LRRE. (22-MC-2021) (sealed). On 11 of the 12 dates, the location data shows that COAXUM's cellphone was not near LRRE in the Bronx, New York. For example, on July 5, 2021, COAXUM reported to the DOC that she went to LRRE for physical therapy. However, LRRE has no record of her going to physical therapy on that date, and COAXUM's cellphone was at or near her home in Harrison, New York, as well as in Yonkers, Queens and Manhattan – but never near LRRE.

18. On September 21, 2021, the defendant MONICA COAXUM reported to the DOC that she went to LRRE for physical therapy. However, LRRE has no record of her going to physical therapy on that date, and COAXUM's cellphone was in Florida. On November 27, 2021, as reflected in the note depicted above, COAXUM reported to the DOC that she went to LRRE for physical therapy. However, LRRE has no record of her going to physical therapy, and COAXUM's cellphone records show that she spent the day driving back to New York from West Virginia, arrived home by approximately 3:36 p.m., and again,

show that COAXUM was never near LRRE.⁶ On all 12 days for which the United States received locational information as a result of the historical cell-site warrant, COAXUM traveled throughout New York City or to different states, despite informing the DOC and her medical providers that she was in pain and had difficulty with normal life activities.⁷

19. Furthermore, on or about August 3, 2022, the Honorable Robert M. Levy, United States Magistrate Judge for the Eastern District of New York, authorized the search and seizure of the defendant MONICA COAXUM's iCloud account, to which her cellphone regularly uploaded content, for photographs and videos. (22-MJ-825) (sealed). Photographs and videos from COAXUM's iCloud account show COAXUM living an active lifestyle despite her claims of being too injured to work. For example, while on sick leave, on or about December 19, 2021, video and photographs show COAXUM dancing at a party. Similarly, on or about January 23, 2022, a video documents a WhatsApp conversation between COAXUM and her family members. At one point in the conversation, one of the participants told COAXUM, "Monica you living your best life but scamming your job." COAXUM responded, "Yes at home still getting paid, unlimited sick baby. Get like me! Living my best life." COAXUM then sends a photograph of herself and her fiancé, the

⁶ On one of the 12 dates for which cell-site location data was obtained, COAXUM's cellphone was near LRRE, but appears to have passed it without stopping.

⁷ On or about September 7, 2022, the Honorable James R. Cho, Magistrate Judge for the Eastern District of New York, signed a search warrant for historical cell-site location information for COAXUM's cellphone for the larger period between September 16, 2021 and April 30, 2022. (22-MJ-2685) (sealed). The resulting records show that COAXUM regularly did not attend medical appointments on dates she claimed to have done so to the DOC, as well as made multiple out-of-state trips while on sick leave without any authorization from the DOC.

defendant EDUARDO TRINIDAD, at a party. A conversation participant responded, “I don’t need to get like you[.] I’m doing it right way...” The participant added in a follow up message, “It don’t look like you hurt in these pics tho,” and later three separate messages, each of which said “Scamming.”

20. On or about August 23, 2022, law enforcement authorities, including myself, approached the defendant MONICA COAXUM. COAXUM voluntarily agreed to speak with law enforcement authorities. She claimed in sum and substance and in part that: (1) she sometimes had given notes to the DOC claiming that she was at physical therapy appointments that she did not in fact attend because DOC sick leave policies are restrictive; (2) she returned to work in May 2022 because the DOC stated that she would be medically separated if she did not return to work; (3) the injury to her left knee has not improved since the 2019 motor vehicle accident, despite the fact that she is now working on regular duty; (4) she never received surgery on her left knee because she is a procrastinator; and (5) after initially denying it, she admitted after being confronted with cell-site evidence that she had traveled to Florida and West Virginia, as described above, in violation of DOC sick leave policy.

IV. The Defendant Eduardo Trinidad’s Federal Program Fraud

21. The defendant EDUARDO TRINIDAD is a resident of Yonkers, New York. TRINIDAD has been a correction officer with the DOC since approximately September 2013. TRINIDAD has been on sick leave since approximately June 2021 (starting a few months after the defendant MONICA COAXUM), during which time he has

collected a full salary. As detailed below, TRINIDAD was instructed to return to work on approximately November 3, 2022.

22. As set forth below, there is probable cause to believe that the defendant EDUARDO TRINIDAD fraudulently received more than \$140,000 in salary by failing to abide by DOC sick leave policies, claiming he was too injured or sick to work when he was in fact able to work and making false reports to the DOC.

23. Subpoenaed medical and DOC records document the defendant EDUARDO TRINIDAD's medical and work history. According to these records, on or about April 18, 2021, TRINIDAD sustained a work injury to his right shoulder, elbow, wrist and fingers (the "April 2021 Injury"). The following month, on or about May 28, 2021, TRINIDAD reported that he injured his left hip, knee and ankle in a slip and fall accident at home (the "May 2021 Injury"). On or about June 3, 2021, TRINIDAD reported to the DOC that he could not work due to "trauma" resulting from the April 2021 Injury. TRINIDAD remained on sick leave for over a year, until approximately November 3, 2022 when he was instructed by the DOC to return to work.

24. Since the dates of the reported injuries, the defendant EDUARDO TRINIDAD has regularly visited medical providers for both alleged injuries.⁸ In accordance with DOC policies, TRINIDAD has reported approximately monthly in person to

⁸ According to the orthopedic surgeon hired by the government referred to previously, MRIs of TRINIDAD following the reported injuries show tears and similar infirmities that are consistent with injury or reinjury, but also ordinary wear and tear. None of the medical documentation received by the government to date shows an injury consistent with severe trauma. The orthopedic surgeon characterized the X-Rays of the defendant's alleged injuries as unremarkable.

an HMD doctor while on sick leave to be evaluated and to provide documentation for his outside medical visits. At a significant number of these visits, TRINIDAD appeared using some combination of a sling, cane and/or boot. However, photographs and videos seized from the defendant MONICA COAXUM's iCloud of TRINIDAD during this same period show that TRINIDAD was not too injured to work and that he sought to defraud HMD.⁹

25. For example, on or about June 4, 2021, the defendant EDUARDO TRINIDAD reported to the DOC wearing a sling. However, on or about June 17, 2021, a photograph of TRINIDAD shows him with his arms up in the air wearing a knapsack. He is not wearing a sling.

26. On or about July 2, 2021, the defendant EDUARDO TRINIDAD reported to a medical provider that he had difficulty bending, squatting, standing and running, and alleged that he experienced seven-out-of-10 pain. On or about July 19, 2021, TRINIDAD reported to a different medical provider that he was suffering persistent pain stemming from the April 2021 Injury and had trouble holding onto things and getting dressed. TRINIDAD and his provider discussed the possibility of arthroscopic surgery due to his claim of persistent, high-level pain. However, the review of the defendant MONICA COAXUM's iCloud revealed that on or about July 26, 2021, TRINIDAD and COAXUM had

⁹ On or about, September 30, 2022, the Honorable Ramon E. Reyes, Jr., Magistrate Judge for the Eastern District of New York, authorized law enforcement to search items already produced by Apple in response to the warrant on the defendant MONICA COAXUM's iCloud account for photographs and videos involving TRINIDAD. (22-MJ-1060) (sealed).

professional photographs taken, and the pictures depict both defendants, each standing on one leg – in each case, the leg that was supposedly injured (her left, his right).

27. On or about August 20, 2021, the defendant EDUARDO TRINIDAD again reported to the DOC wearing a sling. Additionally, on or about August 30, 2021, TRINIDAD reported to a medical provider that he was still experiencing pain and discomfort with certain daily activities stemming from the April 2021 Injury. However, numerous photographs from on or about August 21, 2021 show TRINIDAD doing home improvement work like holding up drywall without wearing a sling.

28. On or about September 24, 2021, the defendant EDUARDO TRINIDAD reported to HMD using a cane and wearing a sling. On or about September 27, 2021, TRINIDAD told a medical provider that the right side of his body was in persistent pain. However, on or about September 17, 2021, a photograph from the defendant MONICA COAXUM's iCloud account shows TRINIDAD at a picnic with COAXUM, in which TRINIDAD is lying down on his right shoulder and arm. TRINIDAD is not wearing a sling in the photograph. Similarly, on or about September 24, 2021, a video shows the defendant MONICA COAXUM reminding TRINIDAD to use a cane and laughing. Similarly, on or about the same date, there is a video of the defendants in which COAXUM tells TRINIDAD that he is "faking," and he was "just lifting shit yesterday." On or about September 30, 2021, there is a video of TRINIDAD carrying what appears to be drywall.

29. On or about October 6, 2021, the defendant EDUARDO TRINIDAD reported to an HMD appointment wearing a sling and boot while using a cane. On or about

October 1, 2021, TRINIDAD was performing construction work such as holding up drywall, as depicted in the below photograph:



30. On or about January 4, 2022, medical records reflect that the defendant EDUARDO TRINIDAD had arthroscopic surgery on his left ankle. On March 14, 2022, the records indicate that TRINIDAD told a medical provider that pain persisted in his right shoulder and elbow during regular activities. On March 18, 2022, TRINIDAD reported to an HMD appointment wearing a boot and sling. According to a video from the defendant MONICA COAXUM's iCloud, COAXUM drove TRINIDAD to the HMD appointment. They jest in the video that TRINIDAD is wearing a sling and a boot. Specifically, COAXUM states, "so you are going to your HMD appointment today" and "he's frauding

the system.” On or about March 26, 2022, there is a video of TRINIDAD bowling, from which a still is included below:



31. On June 15, 2022, the defendant EDUARDO TRINIDAD had arthroscopic surgery on his right shoulder. On or about August 1, 2022, TRINIDAD reported to a medical provider that he had difficulty lifting, pushing, pulling, reaching behind his back, reaching overhead and with self-care activities. TRINIDAD alleged that he was between a 4 and 6 out of 10 for pain in his right shoulder. Additionally, on or about August

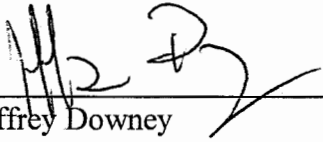
9, 2022, TRINIDAD reported to HMD wearing a sling. However, videos show that on or about July 23, 2022, TRINIDAD and the defendant MONICA COAXUM were dancing at a party. TRINIDAD is not wearing a sling.

32. During his sick leave, while claiming he was too injured to work, the defendant EDUARDO TRINIDAD abused the DOC “log out” system to pursue personal activities. As explained above, correction officers such as TRINIDAD must “log out” to the DOC if they wish to leave their residence outside of the hours of 1:00 p.m. to 5:00 p.m. On or about November 18, 2021, TRINIDAD logged out for a medical appointment in the Bronx for approximately five hours, and then for a physical therapy appointment for approximately five hours. However, on the same date, there is a photograph of TRINIDAD and the defendant MONICA COAXUM at the beach. Additionally, the physical therapy provider has no record of TRINIDAD attending treatment on November 18, 2021. Furthermore, numerous photographs from COAXUM’s iCloud account, cell-site location data and government travel records show that the defendants were in the Dominican Republic between approximately November 18 and November 21, 2021. TRINIDAD reported to the DOC that he was at medical appointments on every day that he was actually in the Dominican Republic.

33. On or about October 5, 2022, the FBI attempted to interview the defendant EDUARDO TRINIDAD, who stated in sum and substance that it hurts to lift his arm. The following month, the DOC instructed TRINIDAD to return to work.

WHEREFORE, your deponent respectfully requests that the defendants MONICA COAXUM and EDUARDO TRINIDAD be dealt with according to law.

I further request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrants. Although the defendants are aware of the investigation, based upon my training and experience, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving the defendants an opportunity to flee from prosecution, destroy or tamper with evidence or will cause potential harm to law enforcement agents seeking to execute the arrest warrants.



Jeffrey Downey
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this
8 day of November, 2022.

Vera M. Scanlon

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK