

**18 MAG 10221 ORIGINAL**

Approved: Matthew J.C. Hellman  
MATTHEW J.C. HELLMAN  
EMILY A. JOHNSON  
DANIEL G. NESSIM  
Assistant United States Attorneys

Before: THE HONORABLE ONA T. WANG  
United States Magistrate Judge  
Southern District of New York

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UNITED STATES OF AMERICA	:
	:
- v. -	:
	:
JANIS BERNS,	:
RAITIS GRIGORJEVS,	:
AGRIS PETROVS, and	:
VALTERS VOLKSONS,	:
	:
Defendants.	:
	:
----- X	:

**COMPLAINT**

Violations of  
18 U.S.C. §§ 1349 and  
1956(h)

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

MATTHEW T. CALLAHAN, 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 and Bank Fraud)

1. From at least in or about October 2018, up to and including the present, in the Southern District of New York and elsewhere, JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants, 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, and bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and object of the conspiracy that JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants, 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, radio, and television 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.

3. It was further a part and object of the conspiracy that JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants, and others known and unknown, willfully and knowingly, executed, or attempted to execute, a scheme or artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349)

**COUNT TWO**

(Conspiracy to Commit Money Laundering)

4. From at least in or about October 2018, up to and including the present, in the Southern District of New York and elsewhere, JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

5. It was a part and an object of the conspiracy that JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did knowingly conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity, to wit, the wire fraud and bank fraud conspiracy charged in Count One of this Complaint, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location,

the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h))

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

6. I have been a Special Agent with the FBI for approximately ten years, and I have been personally involved in the investigation of this matter. I have worked on this investigation with Special Agents of Homeland Security Investigations ("HSI") and agents of United States Customs and Border Protection ("CBP"). This affidavit is based upon my investigation, my conversations with witnesses and other law enforcement agents, my review of bank records and websites, and my examination of physical evidence recovered from a co-conspirator not named as a defendant herein ("CC-1"). 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.

#### Overview

7. From my participation in this investigation, I know that since at least 2015, a group consisting predominantly of Latvian and Lithuanian nationals operating in the United States and foreign countries have been engaged in a scheme to defraud consumers using fake online advertisements for, among other things, the sale of cars, boats, and construction or farm machinery.

8. From conversations with victims of the scheme, among others, and from reviewing records provided by, among others, victims, various banks, the New York State Department of State Division of Corporations ("NYSDOS"), and the Florida Department of State Division of Corporations ("FLDOS"), I have learned that the fraudulent scheme typically operates as follows:

a. The conspirators create phony websites that use the name and owner information of legitimate businesses engaged in selling cars, boats, and machinery. The websites contain vehicle advertisements that include images of cars, boats, or machinery that appear to be taken from other legitimate websites. The phony websites also include a telephone number and/or email address for

consumers to contact. The conspirators also place similar advertisements on Craigslist and eBay, among others, websites that allow users to advertise goods for sale, and in these advertisements also include a telephone number and/or email address for consumers to contact.

b. Once a victim expresses interest in buying a vehicle or other item advertised, the conspirators provide the victim an invoice and sales agreement via email or the internet, with instructions to complete the transaction by wiring funds to a specified bank account.

c. The specified bank accounts are held in the names of shell companies, which are established by scheme participants, who also open the associated bank accounts.

d. After a victim wires the funds to the specified bank account, the conspirators cease communication with the consumer, take down the fraudulent website, and disconnect the telephone number associated with the fraudulent business. The victim never receives the purchased car, boat, or machine, and victim's money is never returned.

9. From reviewing bank records, I have learned that shortly after receiving the victims' wires, the conspirators withdraw the fraudulent proceeds from the bank accounts located into the United States, including in the Southern District of New York, typically through structured withdrawals designed to avoid reporting requirements. Conspirators then send a portion of the cash proceeds overseas via a money services business, such as MoneyGram, to other scheme participants located in Latvia, Lithuania, and other Eastern European countries.

10. Based on my training, experience, and involvement in this investigation, which has included conversations with other law enforcement personnel about both custodial and non-custodial interviews of individuals who have participated in the fraud scheme described herein, I have learned two types of participants in the scheme, among others, are the "drop" and the "handler."<sup>1</sup> The

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<sup>1</sup> Based on conversations with other law enforcement officials, I have learned that multiple individuals arrested and charged in connection with the conspiracy have provided information to law enforcement in hopes of leniency in their own cases. Their information as recounted broadly herein has been corroborated by the investigation by, among other things, reviews of cell phone messages and records, as well as statements by non-cooperating subjects of the investigation.

"drop" is the individual who has corporate bank accounts associated with his or her name and is responsible for directly withdrawing money from inside banks at both teller counters and automated teller machines. The "handler" receives information from co-conspirators, including, among other things, the identities of victims and drops, and the notifications about the times and circumstances of funds that have been transferred into the fraudulent accounts controlled by the conspiracy. The handler then notifies the drops, and frequently escort the drops to the banks. After leaving the bank with withdrawn funds wired by the fraud scheme victims, the drops turn over the funds to the handler outside the bank, and often receive a portion of the proceeds at that time. The handlers are responsible for multiple scheme participants at a given time, and troubleshoot issues as they arise with the banks' efforts to detect fraudulent activity, as described in Paragraph 26, *infra*. Moreover, the handlers have direct access to managers and leaders of the conspiracy, who are responsible for providing information to the handlers regarding the transfer of funds to fraud scheme-controlled accounts by the victims.

Immigration Records Related to the Defendants

11. Based on my communications with a CBP official, I have learned the following:

a. On about October 30, 2018, JANIS BERNS, the defendant, a citizen of Latvia, entered the United States.

b. On about November 16, 2018, RAITIS GRIGORJEVS, the defendant, a citizen of Latvia, entered the United States.

c. On about November 15, 2018, AGRIS PETROVS, the defendant, a citizen of Latvia, entered the United States.

d. On about October 18, 2018, VALTERS VOLKSONS, the defendant, a citizen of Latvia, entered the United States.

Incorporation Records Related to the Defendants

12. Based on my review of records maintained by the FLDOS, I have learned the following:

a. On or about, October 24, 2018, incorporation documents were filed for a domestic business corporation named "JNBR SERVICES INC." with JANIS BERNS, the defendant, listed as registered agent (the "Berns Corporation").

b. On or about, November 13, 2018, incorporation documents were filed for a domestic business corporation named "RAITS LINES INC" with RAITIS GRIGORJEVS, the defendant, listed as registered agent (the "Raitis Corporation").

c. On or about, November 13, 2018, incorporation documents were filed for a domestic business corporation named "PTRVS LINES INC." with AGRIS PETROVS, the defendant, listed as registered agent (the "Petrovs Corporation").

d. On or about, October 19, 2018, incorporation documents were filed for a domestic business corporation named "VLTS LINE INC." with VALTERS VOLKSONS, the defendant, listed as registered agent (the "Valters Corporation").

#### The Indictment and Arrest of CC-1

13. From my review of records and information provided by the CBP, I have learned that CC-1 is a citizen of Latvia who was present in the United States from approximately January 12, 2016 through March 2, 2016; March 11, 2016 through March 26, 2016; and January 18, 2017 through February 10, 2017.

14. From my review of NYSDOS records, I have learned that on or about January 14, 2016, a domestic business corporation ("CC-1 Corporation") was registered with CC-1's name listed as the incorporator.

15. From my review of records provided by three different U.S. banks ("Bank-1", "Bank-2", and "Bank-3"), I have learned that CC-1 opened bank accounts in the name of CC-1 Corporation at each of these banks at bank branches located in Manhattan ("CC-1 Accounts"). The CC-1 Accounts received wire transfers, and CC-1 withdrew cash from the CC-1 Accounts immediately following the withdrawals. In total, CC-1 withdrew at least \$98,497.90 from the CC-1 Accounts.

16. Based on my review of bank records, records maintained by the FBI's Internet Crime Complaint Center ("IC3"), and law enforcement interviews of complainants, I believe that many, if not all, of the wire transfers into the CC-1 Accounts were made by victims of the wire and bank fraud scheme described herein. For example, members of law enforcement involved in the investigation have communicated with an individual, located in Kentucky ("Victim-1"). Based on law enforcement conversations with Victim-1, I have learned that Victim-1 agreed with a person representing the CC-1 Corporation to purchase a boat listed for sale by the CC-1 Corporation. Victim-1 wired \$25,000 to the CC-1 Corporation's

Bank-1 account (the "Victim-1 Wire"). After the Victim-1 Wire, Victim-1 did not receive the boat he attempted to purchase and the CC-1 Corporation ceased communication with Victim-1. The Victim-1 Wire funds were withdrawn from the CC-1 Corporation's Bank-1 Account, and the Victim-1 Wire was never returned to Victim-1.

17. Based on my involvement in this investigation, I have learned that on or about April 4, 2018, a grand jury sitting in the Southern District of New York returned an indictment charging CC-1 with one count of conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349, and one count of conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h).

18. Based on my involvement in this investigation, I have learned that on or about November 28, 2018, members of the Latvian State Police arrested CC-1 at his home in Kuldiga, Latvia pursuant to a Mutual Legal Assistance Treaty request. In connection with this arrest, the Latvian Police seized, among other things, a cellular phone ("CC-1 Phone"). Following his arrest, CC-1 admitted, among other things, that CC-1 was a participant in the fraud scheme described herein; that as a participant in the fraud scheme CC-1 occupied a variety of roles, including withdrawing of funds obtained by the fraud scheme, providing information pertaining to the execution of the fraud scheme to other participants in the fraud scheme, collecting money obtained by other participants in the scheme, and passing these funds to other members of the fraud scheme both within and outside the United States. CC-1 granted United States law enforcement consent to search the CC-1 Phone and thereafter provided the passcode to the CC-1 Phone.

Information Obtained from the CC-1 Phone

19. Based on a review of ICQ messages<sup>2</sup> exchanged between CC-1 and another coconspirator ("CC-2") and stored on the CC-1 phone, I have learned the following<sup>3</sup>:

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<sup>2</sup> ICQ is a web-based instant-messaging client.

<sup>3</sup> Based on the review of these communications, I believe that CC-1 is a manager who works with CC-2 as a handler. CC-2, in turn is the handler to individuals acting as drops, including JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants.

a. Information related to JANIS BERNES, the defendant:

i. CC-2 sent a message stating that business bank accounts in the name of the Berns Corporation were opened at Bank-2, Bank-3, and another U.S. Bank ("Bank-4").<sup>4</sup>

ii. CC-1 sent a message stating that an individual ("Victim-2"), a resident of California, had purchased what he believed to be a Tesla automobile for \$78,000, and that Victim-2 wired that purchase amount to the Berns Corporation account at Bank-2.

iii. CC-1 sent a message stating that a limited liability corporation ("Victim-3") purchased what it believed to be a 2017 Porsche automobile for \$30,000, and that Victim-3 wired that purchase amount to the Berns Corporation account at Bank-2.

iv. CC-2 sent screenshot photographs of Bank-2's mobile banking application for the Bank-2 Berns Corporation account, which showed that deposits in the amounts of \$78,000 and \$30,000 were wired into the account.

b. Information related to RAITIS GRIGORJEVS, the defendant:

i. CC-2 sent a message stating that business bank accounts in the name of the Grigorjevs Corporation were opened at Bank-2, Bank-3, and Bank-4. GRIGORJEVS was listed as the individual associated with each account. GRIGORJEVS's date of birth and passport number are also included as associated with the accounts.

ii. CC-1 sent a message stating that an individual ("Victim-4"), a resident of California, had purchased what he believed to be a Tesla automobile for \$78,000, and that Victim-4 wired that purchase amount to the Grigorjevs Corporation account at Bank-2.

iii. CC-2 sent screenshot photographs of Bank-2's mobile banking application for the Bank-2 Grigorjevs Corporation

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<sup>4</sup> Based on law enforcement review of bank records provided by relevant financial institutions, BERNES was listed as the individual associated with each opened account. BERNES's date of birth and passport number were associated with these accounts in account opening documents.



account, which showed that a deposit of \$78,000 was wired into the account.

iv. CC-1 sent a message stating that an individual ("Victim-5"), a resident of Ohio, had purchased what he believed to be farm equipment for \$14,000, and that Victim-5 wired that purchase amount to the Grigorjevs Corporation account at Bank-3.

c. Information related to AGRIS PETROVS, the defendant:

i. CC-2 sent a message stating that business bank accounts in the name of the Petrovs Corporation were opened at Bank-2, Bank-3, and Bank-4. PETROVS was listed as the individual associated with each account. PETROVS's date of birth and passport number are also included as associated with the accounts.

d. Information related to VALTERS VOLKSONS, the defendant:

i. CC-2 sent a message stating that business bank accounts in the name of the Volksons Corporation were opened at Bank-2, Bank-3, and Bank-4. VOLKSONS was listed as the individual associated with each account. VOLKSONS's date of birth and passport number are also included as associated with the accounts.

ii. CC-1 sent a message stating that an individual ("Victim-6"), a resident of Maryland, had purchased what he believed to be a 1966 Dodge automobile for \$16,500, and that Victim-6 wired that purchase amount to the Volksons Corporation account at Bank-3.

iii. CC-1 sent a message stating that an individual ("Victim-7"), a resident of Texas, had purchased what he believed to be a 1964 Chevrolet automobile for \$13,500, and that Victim-7 wired that purchase amount to the Volksons Corporation account at Bank-2.

iv. CC-2 sent screenshot photographs of Bank-2's mobile banking application for the Bank-2 Volksons Corporation account, which showed account balances of \$22,573, on an unknown date, and \$8,203, on or about November 21, 2018.

e. CC-1 also sent CC-2 messages providing CC-2 with instructions on what a "drop" should say if "they ask about the money." In such instances, the "drop" should say, in sum and substance, that the "drop" wished to purchase a boat and the seller would only accept cash as payment. Based on my training,

experience, involvement in this investigation (namely, the reasons described below in paragraph 26), I believe that "they" in this message refers to bank employees who might have questions before authorizing a withdrawal.

Information Relating to Victims

20. Based on a conversation with Victim-2, see *supra* paragraph 19(a)(ii), and the review of an IC3 complaint submitted by Victim-2 and dated on or about November 28, 2018, I have learned that, as directed by the purported seller, on or about November 13, 2018, Victim-2 transferred \$78,000 to the Bank-2 account associated with the Berns Corporation to purchase what he believed to be a Tesla automobile. Victim-2 did not receive the Tesla automobile purchased or a refund of the money transferred.

21. Based on a conversation with Victim-5, see *supra* paragraph 19(b)(iv), I have learned that, as directed by the purported seller, on or about and between November 25 and November 28th, 2018, Victim-5 transferred \$14,000 to the Bank-3 account associated with the Grigorjevs Corporation to purchase what he believed to be farm equipment. Victim-5 was informed by the purported seller that the farm equipment would be delivered on or about November 29, 2018, but Victim-5 has yet to receive the farm equipment or a refund of the money transferred.

22. Based on a conversation with an individual ("Victim-9") and the review of an IC3 complaint submitted by Victim-9 and dated on or about December 2, 2018, I have learned that, as directed by the purported seller, on or about November 27, 2018, Victim-9 transferred \$55,000 to the Bank-2 account associated with the Petrovs Corporation to purchase what he believed to be a Mercedes Benz automobile. Victim-9 did not receive the Mercedes Benz automobile purchased or a refund of the money transferred.

23. Based on a conversation with an individual ("Victim-8") and the review of an IC3 complaint submitted by Victim-8 and dated on or about November 28, 2018, I have learned that, as directed by the purported seller, on or about November 21, 2018, Victim-8 transferred \$17,000 to the Bank-4 account associated with the Volksons Corporation to purchase what he believed to be a motorcycle. Victim-8 did not receive the motorcycle purchased or a refund of the money transferred.

Other Relevant Information

24. Based on my training, experience, and involvement in this investigation, I have learned that the corporate accounts

employed in the fraud scheme described herein are opened in person at bank branches by the individual associated with the account - the drop. When an account is opened, the drop presents bank officials with a method of identification and documentation related to the corresponding corporation.

25. Based on my training, experience, and involvement in this investigation, I have learned that only the drops described herein are able to withdraw money from those accounts.

26. Based on my training, experience, and involvement in this investigation, I have learned that when drops involved in the fraud scheme described herein attempt to withdraw funds from associated corporate bank accounts, bank employees will sometimes question the drops about the source of funds. Specifically, bank employees may ask drops the (a) name of the person who transferred funds to the corporate account, (b) the location of that person, and (c) the purpose of that transfer (e.g. the type of vehicle or item purchased). In order to respond to these inquiries, handlers provide drops with the information in a similar format to the messages described above, see *supra* paragraph 19.

#### The Defendant' Arrests and Statements

27. Based on my communications with CBP officials, I have learned that JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants, were all scheduled to leave the United States for Europe on a flight scheduled to depart John F. Kennedy International Airport on or about 11:10 p.m. on December 2, 2018.

28. Based on my communications with CBP officials, I have learned that JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants, were all arrested on or about December 2, 2018, at John F. Kennedy International Airport. Each defendant stated that he was at the airport to fly out of the United States.

29. Based on the arrests of the defendants, I have learned the following:

a. Information related to JANIS BERNS, the defendant:

i. At the time of his arrest on or about December 2, 2018, BERNS had on his person, among other things, approximately \$7,100 in cash.

ii. Following his arrest, BERNIS was read and waived his *Miranda* rights, and I interviewed BERNIS. During that interview, which was videotaped, BERNIS stated, in substance and in part, the following: BERNIS stated that he was recruited in Latvia to come to the United States for the purpose of opening bank accounts and withdrawing money from them. BERNIS was promised payment for his services. BERNIS agreed and came to the United States for this purpose, and upon arriving met with a handler. BERNIS opened accounts at multiple banks in the United States and passed the account information to his handler, and the handler began bringing BERNIS to banks, where BERNIS withdrew money, which money he in turn provided to the handler. BERNIS was paid approximately \$10,000 for his services, and acknowledged the money recovered from him at the time of his arrest was derived from the fraud scheme. BERNIS stated that he provided specific information to the banks regarding account openings and transactions based on information transmitted to him by his handler. BERNIS admitted that while engaging in the aforementioned conduct, he knew what he was doing was illegal.

b. Information related to RAITIS GRIGORJEVS, the defendant:

i. At the time of his arrest on or about December 2, 2018, GRIGORJEVS had on his person, among other things, approximately \$2,000 and €2,000 in cash.

ii. Following his arrest, GRIGORJEVS was read and waived his *Miranda* rights, and a member of law enforcement interviewed GRIGORJEVS. During that interview, which was videotaped, GRIGORJEVS stated, in substance and in part, the following: GRIGORJEVS stated he was recruited in Latvia to come to the United States to open bank accounts and withdraw money, and that he would be paid for going on this trip. GRIGORJEVS agreed to do so, and traveled to the United States for this purpose. Once in the United States, GRIGORJEVS met with a handler, who instructed him to open accounts. GRIGORJEVS opened accounts at multiple banks in the United States, and the handler began bringing GRIGORJEVS to these banks, where he withdrew money, which money he in turn provided to the handler. GRIGORJEVS acknowledged withdrawing over \$100,000, and stated he was paid approximately \$10,000 for the aforementioned services, and acknowledged the money recovered from him at the time of his arrest was derived from the fraud scheme. GRIGORJEVS acknowledged that during the period he was executing the above conduct, he knew what he was doing was illegal.

c. Information related to AGRIS PETROVS, the defendant:

i. At the time of his arrest on or about December 2, 2018, PETROVS had on his person, among other things, approximately \$3,900 in cash.

ii. Following his arrest, PETROVS was read and waived his *Miranda* rights, and a member of law enforcement interviewed PETROVS. During that interview, which was videotaped, PETROVS stated, in substance and in part, the following: PETROVS stated he was recruited in Latvia to come to the United States to open bank accounts and withdraw money for a one month period, and that he would be paid for going on this trip. PETROVS agreed to do so, and traveled to the United States for this purpose. Once in the United States, PETROVS met with a handler, who instructed him to open accounts. PETROVS opened accounts at multiple banks in the United States, and the handler began bringing PETROVS to these banks, where he withdrew money, which money he in turn provided to the handler. PETROVS acknowledged withdrawing over \$55,000, and stated he was paid approximately \$4,000 for the aforementioned services, and acknowledged the money recovered from him at the time of his arrest was derived from the fraud scheme. PETROVS acknowledged that during the period he was executing the above conduct, he knew what he was doing was illegal.

d. Information related to VALTERS VOLKSONS, the defendant:

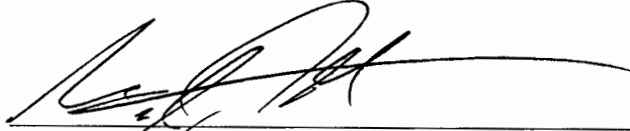
i. At the time of his arrest on or about December 2, 2018, VOLKSONS had on his person, among other things, approximately \$3,000 and €2,000 in cash.

ii. Following his arrest, VOLKSONS was read and waived his *Miranda* rights, and a member of law enforcement interviewed VOLKSONS. During that interview, which was videotaped, VOLKSONS stated, in substance and in part, the following: VOLKSONS stated he was recruited in Latvia to come to the United States to open bank accounts and withdraw money from them, and that he would be paid for doing so. VOLKSONS agreed and traveled to the United States for this purpose. Once in the United States, VOLKSONS met with a handler, who instructed him to open accounts. VOLKSONS opened accounts at multiple banks in the United States, and the handler began bringing VOLKSONS to these banks, where he withdrew money, which money he in turn provided to the handler. VOLKSONS stated that he received 10 percent of each withdrawal; that he typically withdrew \$10,000; and would therefore received \$1,000 in payment for said withdrawal.

30. Based on my participation in the investigation, I know that some of the fraudulent proceeds obtained by members of the

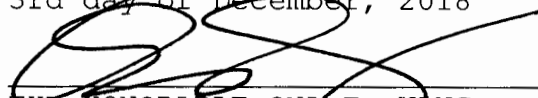
charged conspiracy were sent to banks located in New York, New York.

WHEREFORE, the deponent respectfully requests that JANIS BERNS, RAITIS GRIGORJEVS, AGRIS PETROVS, and VALTERS VOLKSONS, the defendants be imprisoned or bailed, as the case may be.



Special Agent Matthew T. Callahan  
Federal Bureau of Investigation

Sworn to before me this  
3rd day of December, 2018



THE HONORABLE ONA T. WANG  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK