

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA :

- v. - :

SUPERSEDING
INFORMATION

STEVEN L. HENNING, :

S 18 Cr. 859 (CS)

Defendant. :

- - - - -X

COUNT ONE
(Wire Fraud)

The United States Attorney charges:

1. From in or about May 2012 through in or about August 2017, in the Southern District of New York and elsewhere, STEVEN L. HENNING, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, HENNING induced victims to invest approximately \$2 million in his business, OpportunIP LLC, based on false and fraudulent statements and in furtherance of the scheme, on or about November 12, 2015, caused \$500,000 to be wire transferred from a

bank account in Texas, through New York City, to a bank account controlled by HENNING.

(Title 18, United States Code, Section 1343.)

COUNT TWO
(Wire Fraud)

The United States Attorney further charges:

2. From in or about August 2017 through in or about September 2018, in the Northern District of Illinois and elsewhere, STEVEN L. HENNING, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, HENNING induced a victim company (the "Victim") to hire him and provide him with \$240,000 in draw payments based on false and fraudulent statements and in furtherance of the scheme, in or about August 2017, sent emails containing false and fraudulent contracts to the Victim.

(Title 18, United States Code, Section 1343.)

FORFEITURE ALLEGATION

3. As a result of committing the offenses alleged in Counts One and Two of this Information, STEVEN L. HENNING, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of STEVEN L. HENNING, the defendant,

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third party;


(3) has been placed beyond the jurisdiction of the court;

(4) has been substantially diminished in value;
or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 24619(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN
United States Attorney

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Geoffrey S. Berman
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