

Approved: Micah Fergenson  
 MICAH F. FERGENSON / MATTHEW J. KING  
 Assistant United States Attorney

Before: THE HONORABLE BARBARA MOSES  
 United States Magistrate Judge  
 Southern District of New York

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<b><u>SEALED COMPLAINT</u></b>
	:	
- v. -	:	Violations of 18 U.S.C.
	:	§ 1956(h).
ABUCHI SHEDRACH FELIX,	:	
NADINE JAZMINE WADE,	:	COUNTY OF OFFENSE:
OLUWATOMIWA AKINTOLA,	:	BRONX
GREGORY OCHIAGHA,	:	
HABIBA FAGGE, and	:	
OLANREWAYU AJIBOLA,	:	
	:	
Defendants.	:	
	:	
- - - - -	X	

SOUTHERN DISTRICT OF NEW YORK, ss.:

ROSEMARIE FLORENCIO, being duly sworn, deposes and says that she is a Special Agent with the U.S. Secret Service, and charges as follows:

**COUNT ONE**  
**(Conspiracy to Commit Money Laundering)**

1. From at least in or about 2018 up to and including at least in or about 2020, in the Southern District of New York and elsewhere, ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU AJIBOLA, 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).

2. It was a part and an object of the conspiracy that ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU

AJIBOLA, the defendants, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, the mail fraud and wire fraud offenses described in this Complaint, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transactions were designed in whole and in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of 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 the foregoing charges are, in part, as follows:

3. I have been a Special Agent with the U.S. Secret Service for approximately three-and-a-half years. I have received training regarding a variety of types of fraud, and have made and participated in making arrests for fraud offenses. 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.

#### **The Romance Fraud**

4. Based on my discussions with victims and other law enforcement officers involved in this investigation, my review of relevant bank records, my review of email accounts used by conspirators, I have learned of the below-described romance schemes in which the conspirators used online aliases to contact victims on various dating sites, and convince those

victims, under false pretenses, to transfer funds to the defendants and others known and unknown. In particular:

a. One alias frequently employed the names "Diego Francisco," "Richard Francisco," or "Tom Francisco" (the "Francisco Alias").

b. The conspirators used online photos of a male model when providing victims with photos of the Francisco Alias.

c. The Francisco Alias communicated with victims using at least three email accounts ("Francisco Email-1," "Francisco Email-2," and "Francisco Email-3"). Based on records from the provider for these email accounts, I have learned that each account also utilized a voice-over-IP ("VOIP") phone number ("Francisco VOIP-1," "Francisco VOIP-2," and "Francisco VOIP-3," respectively).

d. After engaging in conversation with the victims via phone, text, and email, the conspirators, posing as the Francisco Alias, would ask victims for money. The reason why the Francisco Alias needed money could vary.

e. In one version of the scheme, the Francisco Alias was supposedly an architect who had traveled to Dubai and needed funds in order to receive several million dollars in payment.

f. In another version of the scheme, the Francisco Alias supposedly worked on an oil rig and needed funds to repair the rig.

g. The Francisco Alias would then instruct the victims to transfer funds to bank accounts controlled by the defendants. The means of transfer varied. For example, in some cases, the Francisco Alias instructed victims to obtain cashier's checks or money orders made payable to one of the defendants' companies and then either mail the check to the conspirators - at addresses that included one in the Bronx (the "Bronx Address") - or to deposit the cashier's check directly into a bank account held in the name of one of the defendants' companies. The Francisco Alias would instruct the victims to

send him photographs of any cashier's checks and any mailing labels.

### **The Defendants' Shell Company Accounts**

5. As set forth below, I have learned that each of the defendants created a shell company and opened bank accounts in the name of his or her respective shell company (the "Shell Company Accounts"). The Shell Company Accounts received funds from victims of the romance scheme described above and rapidly depleted those funds through cash withdrawals, cashier's checks, and the purchase of vehicles, among other means. The Shell Company Accounts have received over \$4.5 million between in or about 2018 and 2020, over \$3.5 million of which came from victims of the romance fraud.

### ***The Felix Shell Company Accounts***

a. Based on my review of bank and corporate records, I have learned that ABUCHI SHEDRACH FELIX, the defendant, controls a shell company (the "Felix Shell Company") with multiple bank accounts (the "Felix Shell Company Accounts"). For example:

i. Based on records from a bank ("Bank-1"), I have learned that on or about February 13, 2020, FELIX opened a bank account at the Yonkers branch of Bank-1 in the name of the Felix Shell Company ("Felix Shell Company Account-2479"). FELIX was the sole signatory for Felix Shell Company Account-2479. The description of the Felix Shell Company's business provided by FELIX was "promoter for music and artist events."

ii. Based on records from a second bank ("Bank-2"), I have learned that on or about May 24, 2019, FELIX opened a bank account at Bank-2 in the name of the Felix Shell Company ("Felix Shell Company Account-6677"). FELIX was the sole signatory for Felix Shell Company Account-6677. The description of the Felix Shell Company's business provided by FELIX was "taxi driver and passenger transportation."

b. Based on an analysis of records for the Felix Shell Company Accounts, I have learned the following, among other things:

i. In or about 2019 and 2020, Felix Shell Company Account-2479 and Felix Shell Company Account-6677 collectively received deposits in a combined amount of over \$1

million dollars, including from victims of the romance fraud, such as Victim-1 and Victim-2, discussed further below.

ii. In the same period, a combined amount over \$850,000 was withdrawn in cash from Felix Shell Company Account-2479 and Felix Shell Company Account-6677.

iii. Between in or about July 2019 and in or about November 2019, Felix Shell Company Account-6677 purchased approximately 13 cashier's checks made out to an online car dealer ("Car Dealer-1"), for a total amount of approximately \$34,971.

iv. Between in or about July 2019 and in or about December 2019, Felix Shell Company Account-6677 made approximately 37 electronic transfers to an international money transfer service in a combined amount of approximately \$87,417.

v. In or about June 2020, over \$18,000 was transferred from Felix Shell Company Account-2479 to FELIX's account at a digital currency exchange platform.

vi. In or about 2019 and 2020, the Felix Shell Company Accounts were used to pay for various retail purchases with no apparent business purpose - including payments to food purveyors, liquor stores, car ride services, and steaming video services, for example - in a combined amount over \$81,000.

### ***The Wade Shell Company Accounts***

c. Based on my review of bank and corporate records, I have learned that NADINE JAZMINE WADE, the defendant, controls a shell company (the "Wade Shell Company") with multiple bank accounts (the "Wade Shell Company Accounts"). For example:

i. Based on records from Bank-2, I know that on or about August 12, 2019, WADE opened an account in the name of the Wade Shell Company ("Wade Shell Company Account-4429"). WADE was the sole signatory for Wade Shell Company Account-4429. WADE described the Wade Shell Company's business as selling "accessories such as hair wraps, jewelry, clothes."

ii. Based on records from a third bank ("Bank-3"), I have learned that on or about October 29, 2019, WADE opened an account in the name of the Wade Shell Company ("Wade Shell Company Account-1201"). WADE was the sole signatory

for Wade Shell Company Account-1201. WADE described the Wade Shell Company's business as "clothing whole sellers."

iii. Based on records from a fourth bank ("Bank-4"), I have learned that on or about May 4, 2020, WADE opened an account in the name of the Wade Shell Company ("Wade Shell Company Account-1110"). WADE was the sole signatory for Wade Shell Company Account-1110.

d. Based on an analysis of records for the Wade Shell Company Accounts, I have learned the following, among other things:

i. Between in or about August 2019 and in or about August 2020, the Wade Shell Company Accounts collectively received over \$1 million in deposits, including funds from victims of the romance fraud, such as Victim-1 and Victim-2.

ii. In the same period, a combined amount over \$500,000 was withdrawn in cash from the Wade Shell Company Accounts.

iii. Between in or about September 2019 and August 2020, the Wade Shell Company Accounts purchased approximately 15 cashier's checks payable to Car Dealer-1 in a combined amount over \$76,000.

iv. In or about June and July 2020, Wade Shell Company Account-1110 purchased approximately eight cashier's checks payable to another car dealer ("Car Dealer-2") in a combined amount over \$190,000.

v. In or about March and April 2020, Wade Shell Company Account-1201 executed approximately 10 electronic transfers to WADE, for a combined amount over \$35,000.

vi. Between in or about August 2019 and August 2020, the Wade Shell Company Accounts were used to pay for various retail purchases with no apparent business purpose - including payments to food purveyors, gas stations, car ride services, and furniture stores, for example - in a combined amount over \$44,000.

#### ***The Akintola Shell Company Accounts***

e. Based on my review of bank and corporate records, I have learned that OLUWATOMIWA AKINTOLA, the defendant, controls a shell company (the "Akintola Shell

Company") with multiple bank accounts (the "Akintola Shell Company Accounts"). For example:

i. Based on records from Bank-3, I have learned that on or about December 21, 2018, AKINTOLA opened an account in the name of the Akintola Shell Company ("Akintola Shell Company Account-5915"). AKINTOLA was the sole signatory for Akintola Shell Company Account-5915. AKINTOLA described the business of the Akintola Shell Company as "refurbished phones and laptops."

ii. Based on records from Bank-2, I have learned that on or about December 22, 2018, AKINTOLA opened an account in the name of the Akintola Shell Company ("Akintola Shell Company Account-8347"). AKINTOLA was the sole signatory for Akintola Shell Company Account-8347. In the account documents, AKINTOLA stated the Akintola Shell Company "will buy, sell, and repair consumer electronics."

iii. Based on records from a fourth bank ("Bank-4"), I have learned that on or about July 9, 2019, AKINTOLA opened an account in the name of the Akintola Shell Company ("Akintola Shell Company Account-0076"). Akintola was the sole signatory for Akintola Shell Company Account-0076.

f. Based on an analysis of records for the Akintola Shell Company Accounts, I have learned the following, among other things:

i. Between in or about December 2018 and October 2019, the Akintola Shell Company Accounts received over \$700,000 in deposits, including from victims of the romance fraud, such as Victim-2 and Victim-3.

ii. In the same period, a combined amount over \$560,000 was withdrawn in cash from the Akintola Shell Company Accounts.

iii. In or about August 2019, Akintola Shell Company Account-8347 was used to purchase two cashier's checks payable to Car Dealer-1 in a combined amount over \$17,000.

iv. On or about April 24, 2019, Akintola Shell Company Account-8347 was used to purchase a cashier's check payable to AKINTOLA for \$4,000.

v. Between in or about December 2018 and October 2019, the Akintola Shell Company Accounts were used to

pay for various retail purchases - from food purveyors and car ride services, for example - in a combined amount over \$48,000.

### ***The Ochiagha Shell Company Accounts***

g. Based on my review of bank and corporate records, I have learned that GREGORY OCHIAGHA, the defendant, controls a shell company (the "Ochiagha Shell Company") with multiple bank accounts (the "Ochiagha Shell Company Accounts"). For example:

i. Based on records from a fifth bank ("Bank-5"), I have learned that on or about January 16, 2019, OCHIAGHA opened an account in the name of the Ochiagha Shell Company ("Ochiagha Shell Company Account-5951"). OCHIAGHA was the sole signatory for Ochiagha Shell Company Account-5951.

h. Based on an analysis of records for Ochiagha Shell Company Account-5951, I have learned the following, among other things:

i. Between in or about February 2019 and April 2019, Ochiagha Shell Company Account-5951 received four incoming wire transfers and one cashier's check from four different individuals who I believe are victims of the romance fraud, including Victim-3, in a combined amount of approximately \$58,830.<sup>1</sup>

ii. In the same period, the funds were rapidly depleted, including through checks issued to OCHIAGHA, in a combined amount over \$3,000, and a cashier's check issued to the Ochiagha Shell Company for approximately \$6,408.90 that closed Ochiagha Shell Company Account-5951 and was thereafter deposited into a different Ochiagha Shell Company Account.

### ***The Fagge Shell Company Accounts***

i. Based on my review of bank and corporate records, I have learned that HABIBA FAGGE, the defendant, controls a shell company (the "Fagge Shell Company") with multiple bank accounts (the "Fagge Shell Company Accounts"). For example:

i. Based on records from Bank-2, I know that on or about March 24, 2020, FAGGE opened an account in the name of the Fagge Shell Company ("Fagge Shell Company Account-

---

<sup>1</sup> One of these victim wires was returned to sender by Bank-5.



0295"). FAGGE was the sole signatory for Fagge Shell Company Account-0295.

ii. On or about May 20, 2020, FAGGE opened another account, also at Bank-2, in the name of the Fagge Shell Company ("Fagge Shell Company Account-4542"). FAGGE was the sole signatory for Fagge Shell Company Account-4542.

j. Based on an analysis of records for the Fagge Shell Company Accounts, I have learned the following, among other things:

i. Between in or about April 2020 and October 2020, the Fagge Shell Company Accounts received over \$400,000 in deposits, including from victims of the romance scheme.

ii. In the same period, a combined amount over \$91,000 was withdrawn in cash from the Fagge Shell Company Accounts.

iii. Between in or about June 2020 and October 2020, the Fagge Shell Company Accounts transferred over \$147,000 to car dealers - including Car Dealer-1, Car-Dealer-2, and three other car dealers - in the form of 12 cashier's checks.

iv. Between in or about June 2020 and October 2020, the Fagge Shell Company Accounts sent over \$29,000 using a cash payment application.

v. On or about October 5, 2020, the Fagge Shell Company Account-0295 transferred \$3,300 to FAGGE.

vi. Similarly, the Fagge Shell Company Accounts reflect numerous retail purchases with no apparent business purpose, such as payments for fast food, alcohol, car ride services, and a payment to a division of parole and probation.

#### ***The Ajibola Shell Company Accounts***

k. Based on my review of bank and corporate records, I have learned that OLRANREWAYU AJIBOLA, the defendant, controls a shell company (the "Ajibola Shell Company") with

multiple bank accounts (the "Ajibola Shell Company Accounts"). For example:

i. Based on records from Bank-3, I know that on or about October 29, 2018, AJIBOLA opened an account in the name of the Ajibola Shell Company ("Ajibola Shell Company Account-5712"). AJIBOLA was the sole signatory for Ajibola Shell Company Account-5712. AJIBOLA described the Ajibola Shell Company's business as "car dealer/auction."

1. Based on an analysis of records for Ajibola Shell Company Account-5712, I have learned the following, among other things:

i. Between in or about October 2018 and December 2020, Ajibola Shell Company Account-5712 received over \$592,000 in deposits, including from victims of the romance scheme, such as Victim-1.

ii. Within the same period, over \$97,000 was withdrawn in cash from Ajibola Shell Company Account-5712.

iii. Within the same period, Ajibola Shell Company Account-5712 sent over \$51,000 using a cash payment application.

iv. Within the same period, over \$286,000 was transferred from Ajibola Shell Company Account-5712 to various car dealers, including Car Dealer-1 and Car Dealer-2, as well as four other car dealers.

v. Ajibola Shell Company Account-5712 also made numerous retail purchases with no apparent business purpose, such as payments for fast food, alcohol, and car ride services, in a combined amount over \$23,000.

### **Examples of Victim Funds Sent to the Defendants**

#### ***Victim-1***

6. Based on my discussions with other law enforcement officers who have spoken with Victim-1, and my review of related reports, I have learned the following.

a. Victim-1 met the Francisco Alias online through a dating site. Victim-1 communicated with the Francisco Alias via Francisco Email-2 and VOIP-1, among others.

b. The Francisco Alias told Victim-1 that he was a contractor for a foreign oil company and performed underwater welding on oil rigs.

c. The Francisco Alias first asked Victim-1 for money after they had been in communication for some time. The Francisco Alias told Victim-1 that he was on an oil rig job that suffered an explosion. The Francisco Alias claimed that he could not access his accounts and asked Victim-1 for money to pay for the necessary repairs.

d. When Victim-1 sent funds to the Francisco Alias, she would send a cashier's check payable to an entity and send it to an "agent" via FedEx.

e. The Francisco Alias gave Victim-1 instructions via, among other means, text messages from Francisco VOIP-1.

7. Based on my review of Francisco VOIP-1's text messages, I have learned the following about the Francisco Alias's instructions to Victim-1. The Francisco Alias instructed Victim-1 to obtain cashier's checks payable to the defendants' shell companies. The Francisco Alias instructed Victim-1 at times to mail those checks to NADINE JAZMINE WADE, the defendant, at the Bronx Address.

8. Based on my review of check stubs from Victim-1's bank, as well as FedEx records that were provided by Victim-1, I have learned that Victim-1 sent over \$1 million to the co-conspirators, including through the cashier's checks listed below.

<b>Approx. Date</b>	<b>Approx. Amount</b>	<b>Payee</b>	<b>RE: Line</b>	<b>FedEx Addressee</b>
05/26/20	\$15,000	Wade Shell Company	RE: BLOWOUT PREVENT	NADINE J. WADE The Bronx Address
05/30/20	\$35,000	Wade Shell Company	RE: MACHINERY	NADINE J. WADE The Bronx Address
06/08/20	\$57,000	Wade Shell Company	RE: MACHINERY	NADINE J. WADE The Bronx Address
06/08/20	\$68,000	Felix Shell Company	RE: MACHINERY	
06/10/20	\$26,560	Ajibola Shell Company	RE: MACHINE SHIPPING	NADINE J. WADE The Bronx Address

06/15/20	\$61,000	Fagge Shell Company	RE: SPINNING WRENCHES	
06/15/20	\$61,000	Fagge Shell Company	RE: MACHINE PARTS	
06/16/20	\$26,500	Ajibola Shell Company	RE: SHIPPING	NADINE J. WADE The Bronx Address
06/18/20	\$50,000	Wade Shell Company	RE: MACHINERY	
06/18/20	\$52,000 .00	Felix Shell Company	RE: SPINNERS	
06/26/20	\$79,000	Wade Shell Company	RE: POWER SUPPLY/CA BIN CONTROLS	NADINE J. WADE The Bronx Address
07/01/20	\$64,170	Entity-1 <sup>2</sup>	RE: CABIB CONTROLS, POWER SUPPLY SHIPPING	NADINE J. WADE The Bronx Address
07/10/20	\$79,000	Felix Shell Company	RE: CABIN CONTROLS, POWER SUPPLY, SHIPPING	
07/09/20	\$38,000	Wade Shell Company	RE: MACHINERY	NADINE J. WADE The Bronx Address
07/14/20	\$65,000	Wade Shell Company	RE: INFILTRAT ION SYSTEM	NADINE J. WADE The Bronx Address
07/20/20	\$85,000	Felix Shell Company	RE: MACHINERY	
07/20/20	\$40,000	Wade Shell Company	RE: MACHINERY	
08/03/20	\$75,000	Felix Shell Company	RE: SHIPPING AND CUSTOM CLEARANCE	Newark Address-1 <sup>3</sup>

<sup>2</sup> Entity-1 was an additional entity used in the fraud and money laundering scheme.

<sup>3</sup> Newark Address-1 was an additional address used in the fraud and money laundering scheme.

08/03/20	\$59,000	Wade Shell Company	RE: SHIPPING AND CUSTOM CLEARANCE	
08/17/20	\$60,000	Felix Shell Company	RE: MACHINE SHIPPING	
08/17/20	\$50,000	Wade Shell Company	RE: MACHINE SHIPPING	NADINE J. WADE The Bronx Address
08/28/20	\$87,000	Felix Shell Company	RE: MACHINERY	
08/28/20	\$42,218	Entity-1	RE: MACHINERY	Newark Address-2 <sup>4</sup>

### ***Victim-2***

9. Based on my discussions with other law enforcement officers who interviewed Victim-2, and related reports, I have learned that Victim-2 was also a victim of a romance scheme that employed the Francisco Alias and the damaged oil rig narrative. Victim-2 texted with the Francisco Alias on Francisco VOIP-1 and Francisco VOIP-3.

10. Based on my review of the contents of Francisco VOIP-1 and Francisco VOIP-3, I have learned that the Francisco Alias instructed Victim-2 to obtain cashier's checks payable to the Felix Shell Company, the Akintola Shell Company, the Wade Shell Company, and NADINE JAZMINE WADE, the defendant.

11. Based on my review of bank records provided by Victim-2, Bank-2, Bank-3, and Bank-4, I have learned that Victim-2 obtained over \$500,000 in cashier's checks payable to the Felix Shell Company, the Akintola Shell Company, the Wade Shell Company, and NADINE JAZMINE WADE, the defendant, as summarized in the below chart.

<b>Approx. Date</b>	<b>Approx. Amount</b>	<b>Payee</b>	<b>RE: Line</b>
<b>07/27/19</b>	\$11,000	Akintola Shell Company	
<b>07/30/19</b>	\$10,000	Akintola Shell Company	
<b>08/01/19</b>	\$25,890	Akintola Shell Company	

---

<sup>4</sup> Newark Address-2 was an additional address used in the fraud and money laundering scheme.

08/12/19	\$70,000	Akintola Shell Company	
08/13/19	\$50,000	Felix Shell Company	
08/28/19	\$70,000	Felix Shell Company	Blowout Valve
08/29/19	\$20,150	Akintola Shell Company	Blowout Valve
10/02/19	\$30,000	Wade Shell Company	
10/09/19	\$39,500	Wade Shell Company	Richard Francisco
10/17/19	\$55,000	Wade Shell Company	Richard B. Francisco
12/11/19	\$15,000	Felix Shell Company	
12/13/19	\$14,000	Felix Shell Company	
04/23/20	\$43,490	NADINE JAZMINE WADE	
04/29/20	\$74,000	NADINE JAZMINE WADE	

### ***Victim-3***

12. Based on my discussions with Victim-3 and my review of records, including emails, provided by Victim-3, I have learned the following:

a. On or about March 25, 2019, Victim-3 was contacted by an account using the the Francisco Alias on an internet dating site. Victim-3 and the Francisco Alias began conversing via text, Skype, and email. The email address used to converse with Victim-3 was Francisco Email-1.

b. After approximately one week of communication, the Francisco Alias told Victim-3 that he wanted to meet. The Francisco Alias, who was supposedly a civil engineer, stated that he had to go to Dubai for a presentation to the Ministry of Works for a \$12 million project, and he would then fly to meet Victim-3. Thereafter, the Francisco Alias contacted Victim-3 and stated that he had won the contract, but he needed to pay for a contract approval certificate and that he was unable to do so because his bank account had been frozen.

c. The Francisco Alias asked Victim-3 to send approximately \$12,890 to Akintola Shell Company Account-5915. On or about April 3, 2019, Victim-1 wired the money as requested by the Francisco Alias.

d. Thereafter, the Francisco Alias continued to request funds from Victim-3 under false pretenses and Victim-3

acceded to the requests, including by executing the transactions listed below.

Approx. Date	Approx. Amount	Transfer Type	Payee
04/04/19	\$30,280	Wire	Ochiagha Shell Company
04/03/19	\$12,890	Wire	Akintola Shell Company
04/11/19	\$37,000	Cashier's Check	Akintola Shell Company
04/12/19	\$23,000	Cashier's Check	Akintola Shell Company
05/18/19	\$20,000	Cashier's Check	ABUCHI SHEDRACH FELIX
06/17/19	\$30,000	Cashier's Check	ABUCHI SHEDRACH FELIX

WHEREFORE the deponent requests that warrants be issued for the arrests of ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU AJIBOLA, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

*s/ Rosemarie Florencio by the Court with permission*

Rosemarie Florencio  
Special Agent  
U.S. Secret Service

Sworn to me through the transmission of this Affidavit by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3), this May 25, 2021



THE HONORABLE BARBARA MOSES  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK