


Approved:

  
BENJAMIN A. GIANFORTI / JAMES McMAHON  
Assistant United States Attorneys

Before: HONORABLE ANDREW E. KRAUSE  
United States Magistrate Judge  
Southern District of New York

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: 22 Mag. 5882  
:   
: UNITED STATES OF AMERICA : SEALED  
: : COMPLAINT  
: :   
: - v. - : Violations of  
: : 18 U.S.C. §§ 2, 1028A(a)(1),  
: : 1028A(b), 1341, & 1349  
: :   
: BAKARE DOUKOURE, :  
: SANNEH TUNKARA, and :  
: LASSANA SYLLA, :  
: :  
: Defendants. : COUNTIES OF OFFENSE:  
: : Bronx, Rockland, Westchester  
: :  
: ----- x

SOUTHERN DISTRICT OF NEW YORK, ss.:

DANIEL GABEL, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

**COUNT ONE**  
**(Conspiracy to Commit Mail Fraud)**

1. From at least in or about June 2012 up to and including at least in or about April 2018, in the Southern District of New York and elsewhere, BAKARE DOUKOURE, SANNEH TUNKARA, and LASSANA SYLLA, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit mail fraud, in violation of Title 18, United States Code, Section 1341.

2. It was a part and object of the conspiracy that BAKARE DOUKOURE, SANNEH TUNKARA, and LASSANA SYLLA, 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, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the United States Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and would and did take and receive therefrom, such matters and things, and would and did cause to be delivered by mail and such carriers according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, in violation of Title 18, United States Code, Section 1341.

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

**COUNT TWO**  
**(Mail Fraud)**

3. From at least in or about June 2012 up to and including at least in or about April 2018, in the Southern District of New York and elsewhere, BAKARE DOUKOURE, SANNEH TUNKARA, and LASSANA SYLLA, the defendants, 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, for the purpose of executing such scheme and artifice and attempting so to do, did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the United States Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and receive therefrom, such matters and things, and did cause to be delivered by mail and such carriers, according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, to wit, DOUKOURE, TUNKARA, and SYLLA fraudulently obtained checks from the New York State Comptroller's Office (the "State Comptroller") of Unclaimed Funds (the "OUF") by submitting fraudulent claims for unclaimed funds, and receiving fraudulently-obtained OUF checks, through the United States Postal Service ("USPS").

(Title 18, United States Code, Sections 1341 and 2.)

**COUNT THREE**  
**(Aggravated Identity Theft)**

4. From at least in or about June 2012 up to and including at least in or about April 2018, in the Southern District of New York and elsewhere, BAKARE DOUKOURE, the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, DOUKOURE used a fake Connecticut driver's license with another individual's name and birthdate ("Victim-1") in connection with the offenses charged in Counts One and Two of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1),  
1028A(b), and 2.)

**COUNT FOUR**  
**(Aggravated Identity Theft)**

5. From at least in or about June 2012 up to and including at least in or about April 2018, in the Southern District of New York and elsewhere, BAKARE DOUKOURE, the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, DOUKOURE used a fake Pennsylvania driver's license with another individual's name and birthdate ("Victim-2") in connection with the offenses charged in Counts One and Two of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1),  
1028A(b), and 2.)

**COUNT FIVE**  
**(Aggravated Identity Theft)**

6. From at least in or about June 2012 up to and including at least in or about April 2018, in the Southern District of New York and elsewhere, SANNEH TUNKARA, the defendant, knowingly did transfer, possess, and use, without

lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, TUNKARA used another individual's Permanent Resident Card ("Victim-3") in connection with the offenses charged in Counts One and Two of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1),  
1028A(b), and 2.)

**Background on the New York State Comptroller's Office of  
Unclaimed Funds**

7. Based on my involvement in this investigation, as well as my conversations with personnel from the State Comptroller, I have learned the following about the State Comptroller's Office of Unclaimed Funds:

a. New York State's Abandoned Property Law Section 1406 requires certain entities, such as banks, insurance companies, and corporations, to transfer abandoned money or securities to the OUF after a designated period of time. The State Comptroller then serves as the custodian of those unclaimed funds until they are claimed by the rightful owners. The State Comptroller Office maintains a dedicated account at a national bank ("Bank-1") outside the State of New York solely for unclaimed funds. The funds remain in this account until they are claimed. There is no expiration date.

b. The State Comptroller's website contains a publicly searchable list of all the individuals who have funds held by the OUF. The listing sets forth the owner of the funds' name and address at the time the funds were sent to the OUF, but does not indicate the value of the funds being held.

c. To recover funds held by the State Comptroller, an individual can submit a claim in a variety of ways, including by sending in a paper application through the USPS. However the claim is made, the applicant must verify certain personal identifying information ("PII") associated with the unclaimed funds, such as the owner of the funds' social security number, address, and proof of ownership of the unclaimed funds. The level of verification required differs depending on the value of

the claim, with larger claims requiring additional assurances from the claimant and review by the State Comptroller.

d. When an individual submits a claim, the State Comptroller reviews the PII provided by the applicant, as well as prior addresses associated with the applicant, to determine whether the information matches the information that the State Comptroller has with respect to the applicant. If the information provided by the applicant meets the State Comptroller's requirements, and the claim otherwise passes review by the State Comptroller, the State Comptroller issues a paper check out of the account held at Bank-1 and sends the check to the applicant through the USPS to the address provided by the claimant.

**The Scheme to Fraudulently Obtain Unclaimed Funds from the OUF**

8. Based on my involvement in this investigation, my conversations with other members of law enforcement, investigators from the State Comptroller, and a number of victims, and my review of bank records and other materials obtained during the course of the investigation, I have learned the following about a scheme to fraudulently obtain unclaimed funds from the OUF carried out by, among others, BAKARE DOUKOURE, SANNEH TUNKARA, and LASSANA SYLLA, the defendants.

9. In or about January 2015, Victim-4 reported to the State Comptroller that OUF funds in her name had been fraudulently applied for and collected without her consent. Investigative work by the State Comptroller following this report ultimately revealed the following, among other things:

a. From at least in or about June 2012 up to and including at least in or about April 2018, the State Comptroller issued approximately 170 OUF checks made out to approximately 120 different payees that were deposited in approximately eight different bank accounts that were controlled by either BAKARE DOUKOURE or SANNEH TUNKARA, the defendants. The victims of this scheme included at least one resident of Westchester County and one resident of Rockland County.

b. Of these approximately 170 OUF checks, approximately five checks were mailed to an apartment building in the Bronx where I believe DOUKOURE was living during the

relevant period and approximately ten checks were mailed to another apartment building in the Bronx where I believe TUNKARA was living during the relevant period, based on my review of law enforcement and other public records. Approximately 18 of these 170 checks, which totaled approximately \$10,749, were deposited in approximately two bank accounts controlled by DOUKOURE. Approximately 152 of these 170 checks, which totaled approximately \$72,220, were deposited in approximately six bank accounts controlled by TUNKARA.

c. As discussed in more detail below, the State Comptroller's review also determined that, during the relevant period, the State Comptroller issued an OUF check in the amount of approximately \$74,105 made out to someone other than LASSANA SYLLA, the defendant, that SYLLA deposited in a bank account he controlled.

10. I do not believe that any of the approximately 171 OUF checks that were deposited in bank accounts controlled by BAKARE DOUKOURE, SANNEH TUNKARA, and LASSANA SYLLA, the defendants, were obtained legitimately for the following reasons, among others.

11. Based on my discussions with personnel from the State Comptroller, I understand that none of the approximately 171 OUF checks that were deposited in bank accounts controlled by BAKARE DOUKOURE, SANNEH TUNKARA, and LASSANA SYLLA, the defendants, were issued in the name of any of the defendants. Based on my discussions with a number of victims of the defendants' scheme, I do not believe that the defendants were authorized by any of the OUF checks' payees to apply for or deposit the victims' unclaimed funds.

12. With respect to BAKARE DOUKOURE, the defendant, I have learned the following about his participation in the scheme to fraudulently obtain unclaimed funds from the OUF, among other things:

a. Based on my review of records obtained from Bank-2, I know that in or about May 2009, DOUKOURE opened a personal bank account at Bank-2 with an account number ending in 7595 (the "7595 Account"). Bank-2's records indicate that DOUKOURE was the sole signatory on the 7595 Account. In or about August 2010, the 7595 Account was used to make approximately seven

purchases, one of which was refunded, from an online database of public records that purports to offer its customers "in-depth and up-to-date information on just about every adult in the U.S." ("Website-1").

b. Based on my review of records obtained from Bank-2, I know that in or about September 2013, DOUKOURE opened a personal bank account at Bank-2 with an account number ending in 7617 (the "7617 Account"). Bank-2's records indicate that DOUKOURE was the sole signatory on the 7617 Account. Between in or about October 2013 and in or about March 2014, approximately 13 OUF checks made out to approximately nine different payees, totaling approximately \$8,324, were deposited in the 7617 Account. Between in or about October 2013 and in or about November 2013, the 7617 Account was used to make approximately two purchases from another online database of public records ("Website-2"). The 7617 Account was also used to make a single purchase from a third online database of public records ("Website-3") in or about October 2013. That purchase was refunded the same day.

c. All of the approximately 13 OUF checks deposited in the 7617 Account were double-endorsed on the back. The top endorsement was generally what I believe to be a forged signature of the payee; the bottom endorsement was generally indicative of DOUKOURE having signed it, with signatures such as "Bakare Doukoure," "BD," and "B Doukoure."

d. On or about April 18, 2019, I and personnel from the State Comptroller interviewed one of the payees of the approximately 13 checks that were deposited in the 7617 Account ("Victim-5"). Victim-5 did not recognize the approximately \$522 check with her name on it that was deposited in the 7617 Account on or about November 6, 2013, nor did she endorse it or recognize the name of the individual who did endorse it. Indeed, Victim-5 did not know DOUKOURE and never gave him or anyone else authority to claim OUF funds on her behalf. Later, Victim-5 confirmed via affidavit that she never received the approximately \$522 in unclaimed funds that were deposited in the 7617 Account.

e. Based on my review of records obtained from Bank-2, I know that in or about January 2014, DOUKOURE opened a business bank account at Bank-2 with an account number ending in

9870 (the "9870 Account"). DOUKOURE opened the 9870 Account in the name of "Koure Carpet Cleaning, Inc." and represented to Bank-2 that the company was involved in carpet and upholstery cleaning services. Bank-2's records indicate that DOUKOURE was the sole signatory on the 9870 Account. Between in or about February 2014 and in or about March 2014, approximately five OUF checks made out to approximately three different payees, totaling approximately \$2,424, were deposited in the 9870 Account.

f. All of these approximately five checks were double-endorsed on the back. The top endorsement was generally what I believe to be a forged signature of the payee; the bottom endorsement was generally indicative of DOUKOURE having signed it, with signatures such as "Bakare Doukoure," "Bakare D," and "Koure."

g. Based on my discussions with a forensic auditor with the State Comptroller who analyzed the transaction activity in the 9870 Account, I understand that there is no activity in the account consistent with the operation of a carpet and upholstery cleaning business. For instance, there are no apparent deposits from customers, payments reflecting payroll, or expenses for taxes. The 9870 Account was also used to make approximately purchase from Website-1 in or about February 2014, which was later refunded.

h. Based on my review of, among other things, records obtained from a check casher in the Bronx ("Check Casher-1"), including surveillance footage, I know that, on or about March 16, 2016, DOUKOURE, whom I recognize from public records, as well as my participation in this investigation, cashed an OUF check in the amount of approximately \$1,074, made payable to Victim-1, at Check Casher-1. When he cashed the check, DOUKOURE presented a Connecticut driver's license with his photograph, but Victim-1's name and birthdate. Based on my discussions with other USPIS personnel who corresponded with personnel from the State of Connecticut, I understand that the State of Connecticut has no record of the driver's license that DOUKOURE presented to Check Casher-1. Based on my involvement in this investigation, I know that Victim-1's OUF check was initially mailed to SANNEH TUNKARA's, the defendant, apartment building.



i. Based on my review of a report of an interview of Victim-1 conducted by personnel from the State Comptroller on or about October 5, 2020, I know that Victim-1 stated, in substance and in part, that he had never lived in Connecticut. Victim-1 confirmed that it was his name and birthdate on the fake Connecticut driver's license DOUKOURE used at Check Casher-1. Victim-1 told us that he never submitted a claim to OUF for any unclaimed funds in his name. Victim-1 did not recognize the approximately \$1,074 check with his name on it that was cashed at Check Casher-1, nor did he endorse it. Victim-1 did not know DOUKOURE and never gave him or anyone else authority to claim OUF funds on his behalf. Finally, Victim-1 confirmed that he never received the approximately \$1,074 in unclaimed funds that DOUKOURE cashed at Check Casher-1.

j. Based on my review of, among other things, records obtained from another check casher in the Bronx ("Check Casher-2"), including surveillance footage, I know that, on or about January 5, 2018, DOUKOURE cashed approximately five OUF checks totaling approximately \$3,182, made payable to Victim-2, at Check Casher-2. Check Casher-2's records indicate that, when DOUKOURE cashed the checks, he presented a Pennsylvania driver's license with Victim-2's name, slightly misspelled, and birthdate. DOUKOURE also provided Check Casher-2 with a Bronx address. Based on my discussions with USPIIS personnel who corresponded with the State of Pennsylvania, I understand that the State of Pennsylvania has no record of the driver's license DOUKOURE presented to Check Casher-2.

k. Based on my review of a report of an interview of Victim-2 conducted by other members of law enforcement and personnel from the State Comptroller on or about March 28, 2019, as well as my conversations about that interview with the individuals who conducted it, I understand that Victim-2 has never lived at the Bronx address DOUKOURE provided to Check Casher-2. Victim-2 confirmed that it was his name, slightly misspelled, and birthdate on the fake Pennsylvania driver's license DOUKOURE used at Check Casher-2. Victim-2 also confirmed that it was his social security number on a form that was submitted to the State Comptroller in connection with the application for Victim-2's OUF funds. Victim-2 told us that he never submitted a claim to OUF for any unclaimed funds in his name. Victim-2 did not recognize the OUF checks with his name on them that were cashed at Check Casher-2, nor did he endorse

them. Victim-2 did not know DOUKOURE. Later, Victim-1 confirmed via affidavit that he never received the approximately \$3,182 in unclaimed funds that DOUKOURE cashed at Check Casher-2.

13. With respect to SANNEH TUNKARA, the defendant, I have learned the following about her participation in the scheme to fraudulently obtain unclaimed funds from the OUF, among other things:

a. Based on my review of records obtained from Bank-2, I know that, in or about February 2008, TUNKARA opened a personal bank account at a bank (later purchased by Bank-2, "Bank-3") with an account number ending in 7072 (the "7072 Account"). Between in or about June 2012 and in or about August 2012, approximately 34 OUF checks made out to approximately 21 different payees, totaling approximately \$8,882, were deposited in the 7072 Account. Of these approximately 34 checks, approximately three checks appear to have been endorsed by BAKARE DOUKOURE, the defendant.

b. Based on my review of records obtained from Bank-2, I know that, in or about February 2008, TUNKARA opened a fiduciary trust account at Bank-3 with an account number ending in 6644 (the "6644 Account"). Between in or about July 2012 and in or about October 2012, approximately 20 OUF checks made out to approximately 15 different payees, totaling approximately \$5,451, were deposited in the 6644 Account.

c. Based on my review of records obtained from Bank-4, I know that, in or about February 2014, TUNKARA opened a personal bank account with an account number ending in 8626 (the "8626 Account"). Between in or about March 2014 and in or about July 2014, approximately two OUF checks made out to approximately 2 different payees, totaling approximately \$2,596, were deposited in the 8626 Account. Between in or about April 2014 and May 2014, the 8626 Account was used to make approximately two purchases from Website-1.

d. Based on my review of records obtained from Bank-2, a report of an interview of TUNKARA conducted by other members of law enforcement and personnel from the State Comptroller on or about August 20, 2020, and my own interview of TUNKARA on or about July 7, 2022, I know that, in or about August 2015, TUNKARA opened a personal bank account at Bank-2 in

the name of Victim-3 with an account number ending in 2327 (the "2327 Account"). TUNKARA opened the 2327 Account by posing as Victim-3, who is a relative of TUNKARA's, and using Victim-3's Permanent Resident Card. Bank-2's records indicate that Victim-3 was ostensibly the sole signatory on the 2327 Account. Between in or about August 2015 and in or about May 2018, approximately 93 OUF checks made out to approximately 70 different payees, totaling approximately \$54,644, were deposited in the 2327 Account. Between in or about December 2015 and February 2017, the 2327 Account was used to make approximately five purchases from Website-1, approximately two of which were refunded. When I and personnel from the State Comptroller interviewed Victim-3 on or about August 18, 2020, Victim-3 claimed that she was unaware of the existence of the 2327 Account.

e. All of the approximately 93 OUF checks deposited in the 2327 Account were double-endorsed on the back. For all but approximately one check, the top endorsement was generally what I believe to be a forged signature of the payee; the bottom endorsement was generally indicative of someone posing as Victim-3 having signed it, with signatures consistent with Victim-3's name and initials.<sup>1</sup>

f. Based on my review of a report of a January 23, 2019 interview conducted by personnel from the State Comptroller of one of the payees of the approximately 93 OUF checks that were deposited in the 2327 Account ("Victim-6"), I understand that Victim-6 never submitted a claim to the OUF for any unclaimed funds in his name. Victim-6 did not recognize the approximately \$2,678 check with his name on it that was deposited in the 2327 Account on or about March 3, 2016, nor did he endorse it or recognize the initials of the individual who did endorse it (purportedly Victim-3). Indeed, Victim-6 did not know Victim-3 and never gave Victim-3 or anyone else authority to claim OUF funds on Victim-6's behalf. Finally, Victim-6 confirmed that he never received the approximately \$2,678 in unclaimed funds that were deposited in the 2327 Account.

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<sup>1</sup> On approximately one check, the signature consistent with Victim-3's name was the top endorsement and the forged payee signature was the bottom endorsement.

g. Based on my review of records obtained from Bank-5 I know that, in or about April 2015, TUNKARA opened a personal bank account with an account number ending in 5557 (the "5557 Account"). Between in or about June 2016 and December 2017, the 5557 Account was used to make approximately three purchases from Website-1.

h. In connection with this investigation, I have reviewed a report of an interview conducted of TUNKARA by other members of law enforcement and personnel from the State Comptroller on or about August 20, 2020, from which I have learned the following, among other things:

i. TUNKARA initially misidentified herself as Victim-3 and claimed that the actual TUNKARA was in the hospital. When confronted with a photograph of herself, TUNKARA admitted that she was in fact TUNKARA.

ii. TUNKARA admitted that, in or about 2011 or 2012, she began depositing OUF checks at DOUKOURE's direction. TUNKARA also claimed that she gave DOUKOURE all of the proceeds from the OUF checks in cash. TUNKARA was shown an account statement from the 6644 Account. TUNKARA acknowledged that it was her account and also admitted that she deposited OUF checks in the 2327 Account without Victim-3's knowledge. TUNKARA was then shown copies of the OUF checks that were deposited in the 6644 Account; TUNKARA admitted that she had deposited the checks and did not know any of the payees. TUNKARA also admitted to receiving OUF checks at her residence. TUNKARA claimed that the last time she deposited OUF checks for DOUKOURE was in or about 2017 or 2018.

iii. When asked how she came into possession of OUF claimants' PII, TUNKARA initially indicated that it came from a "website," but then backtracked and said that she did not remember where the information came from. When asked specifically about Website-1, TUNKARA claimed that she had not heard of it. When asked whether she controlled the 5557 Account, TUNKARA acknowledged that she did. When asked about certain purchases from Website-1 that were reflected in the 5557 Account, TUNKARA stated, in substance and in part, that she authorized DOUKOURE at some point to use the debit card that was associated with the 5557 Account.

14. Taking the foregoing together, I respectfully submit that there is probable cause to believe that, between in or about June 2012 up to and including at least in or about April 2018, DOUKOURE BAKARE and SANNEH TUNKARA, the defendants, used and/or attempted to use Website-1, Website-2, and Website-3 to obtain PII for individuals with unclaimed funds held by the State Comptroller in order to make fraudulent applications in the names of those individuals.

15. With respect to LASSANA SYLLA, the defendant, I have learned the following about his participation in the scheme to fraudulently obtain unclaimed funds from the OUF, among other things:

a. Based on my review of records obtained from Bank-6, as well as my interview of SYLLA on or about June 23, 2022, I know that, in or about September 2017, SYLLA opened a business bank account at Bank-6 with an account number ending in 1663 (the "1663 Account"). SYLLA opened the 1663 Account in the name of "DBA Lassana Sylla Used Auto Sales Lassana Sylla Sole Prop." Bank-6's records indicate that SYLLA is the sole signatory on the 1663 Account. In or about January 2018, an OUF check in the amount of \$74,105 made out to Victim-7 was deposited in the 1663 Account. As with other checks identified as part of this scheme, this check was double-endorsed on the back, with one of the signatures an apparently forged signature of the check's payee and the other an apparent endorsement by SYLLA. Based on my involvement in this investigation, I know that the State Comptroller's investigation identified a second OUF check in the amount of approximately \$213 made out to another payee that was similarly double-endorsed, apparently by SYLLA.

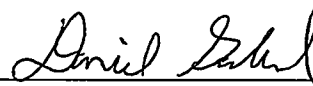
b. During my interview with SYLLA, he admitted that the 1663 Account, as well as the signature on the back of the larger of the two OUF checks described above, were his. SYLLA stated, in substance and in part, that he came to receive the two checks through a chain of people. He recalled initially receiving a call from a male in New York ("CC-1"), before correcting himself and stating that it was another individual ("CC-2"). Based on my involvement in this investigation, I am familiar with both CC-1 and CC-2, and understand that CC-1 may have been the principal organizer of this scheme until his death in or about April 2018. SYLLA explained that he met CC-2 through a tax preparer in New York who used to do SYLLA's taxes. SYLLA

understood from the tax preparer that CC-2 and one of his friends ("Individual-1") were looking for someone with a business bank account. The tax preparer put CC-2 in touch with SYLLA.

c. At some point after this, CC-2 called SYLLA and told SYLLA that CC-2 had a check for approximately \$74,105 that CC-2 needed to deposit somewhere. SYLLA agreed to let CC-2 use the 1663 Account.

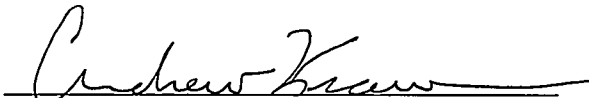
d. At some point following this phone call, CC-2 met SYLLA in Philadelphia, Pennsylvania, which is where SYLLA resides. CC-2 brought Individual-1 with him to meet SYLLA. Individual-1 showed SYLLA a New York State identification card with Individual-1's face, but Victim-7's name, on it and told SYLLA the check was "good." SYLLA showed me a picture of Individual-1. Based on my review of public records, as well as my involvement in this investigation, I recognized Individual-1 as BAKARE DOUKOURE, the defendant.

WHEREFORE, deponent prays that BAKARE DOUKOURE, SANNEH TUNKARA, and LASSANA SYLLA, the defendants, be arrested, and imprisoned or bailed as the case may be.



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DANIEL GABEL  
Postal Inspector  
United States Postal Inspection Service

Sworn to before me this  
18th day of July, 2022



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HONORABLE ANDREW E. KRAUSE  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK