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F. #2018R00594

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

BRUCE SHOENGOOD,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

KURTDENGLER, 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.

Upon information and belief, in or about and between May 2016 and January 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BRUCE SHOENGOOD, together with others, did knowingly and willfully use and employ one or more manipulative and deceptive devices and contrivances, contrary to Rule 10b-5 of the Rules and Regulations of the United States Securities and Exchange Commission, Title 17, Code of Federal Regulations, Section 240.10b-5, by (a) employing one or more devices, schemes and artifices to defraud; (b) making one or more untrue statements of material fact and omitting to state one or more material facts necessary in order to make the statements made, in the light of the circumstances in which they were made, not misleading; and (c) engaging in one or more

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COMPLAINT AND AFFIDAVIT IN
SUPPORT OF APPLICATION FOR
ARREST WARRANT

(15 U.S.C. §§ 78j(b) and 78ff; 18 U.S.C.
§ 2 and 3551 et seq.)

acts, practices and courses of business which would and did operate as a fraud and deceit upon one or more investors and potential investors in Medifirst Solutions, Inc., in connection with the purchase and sale of investments in Medifirst Solutions, Inc., directly and indirectly, by use of means and instrumentalities of interstate commerce and the mails.

(Title 15, United States Code, Sections 78j(b) and 78ff; Title 18, United States Code, Sections 2 and 3551 et seq.)

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

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been involved in the investigation of numerous cases involving securities fraud, wire fraud and money laundering. These investigations have involved the use of electronic and physical surveillance; informants and cooperating witnesses; undercover operations; and the preparation and execution of search and arrest warrants. My training included courses in law enforcement techniques, federal criminal statutes, criminal investigations, execution of search warrants, financial investigative techniques, and legal principles and statutes related to criminal violations of the United States Code. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts I learned from other law enforcement agents. Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendant, I have not set forth each and every fact

learned during the course of the investigation described below. Instead, I have set forth only those facts that I believe are necessary to establish probable cause for the arrest warrant sought herein. In addition, where the contents of documents or the actions, statements and conversations of others are reported herein, they are reported in sum and substance and in part.

PROBABLE CAUSE

I. The Defendants and Relevant Entities

1. The defendant BRUCE SCHOENGOOD was the Chief Executive Officer of Medifirst Solutions, Inc. and a resident of New Jersey.
2. Medifirst Solutions, Inc., based in Nevada, was a company whose shares publicly-traded on the over-the-counter exchange under the ticker symbol MFST (“MFST”). MFST’s common stock was registered with the United States Securities and Exchange Commission (the “SEC”) under Section 12 of the Securities Exchange Act of 1934. In public statements, MFST purported to market an infrared Time Machine TTML-8102000 Laser Thermal Therapeutic Device for temporary relief of minor muscle and joint pain, stiffness, minor arthritis pain, muscle spasm, temporary increase in local blood circulation and temporary relaxation of muscles by means of topical elevated tissue temperature from infrared spectral emissions.
3. Investment Relations Firm 1, whose identity is known to your deponent, purported to be an investment relations firm based in San Diego, California.
4. Co-Conspirator 1, whose identity is known to your deponent, was associated with Investment Relations Firm 1 and a resident of California.

5. Co-Conspirator 2, whose identity is known to your deponent, was a stock promoter. On or about July 18, 2017, Co-Conspirator 2 was arrested and began cooperating with the government. On or about November 7, 2017, Co-Conspirator 2 pled guilty pursuant to a cooperation agreement with the government to conspiracy to commit securities fraud. Co-Conspirator 2's information has proven reliable and has been corroborated.

II. Relevant Regulatory Principles and Definitions

6. A "security" was, among other things, any note, stock, bond, debenture, evidence of indebtedness, investment contract or participation in any profit-sharing agreement.

7. The term "beneficial owner" was defined under the rules of the United States Securities and Exchange Commission ("SEC"). It included any person who directly or indirectly shared voting power or investment power (i.e., the power to sell a security).

8. A "public company" was a company that issued securities and traded its stock on a stock exchange or over-the-counter market. The company's shareholders were the equity owners of the company. Daily trading in the market determined the value of the company.

9. "Microcap" or "penny" stocks referred to stocks of publicly traded U.S. companies that have a low market capitalization. Microcap stocks were often subject to price manipulation because they were thinly traded and subject to less regulatory scrutiny than stocks that traded on notable exchanges. Additionally, large blocks of microcap stock were often controlled by a small group of individuals, which enabled those in the group to control or orchestrate manipulative trading in those stocks.

10. “Over-the-counter” (“OTC”) referred to how securities of public companies that were not listed on a centralized exchange, such as the New York Stock Exchange or NASDAQ, were traded. OTC trades occurred over a broker-dealer network. Penny stocks were typically traded OTC.

11. A stock manipulation scheme was a scheme in which a group of individuals who controlled large numbers of allegedly unrestricted shares of a microcap company fraudulently inflated the share price and trading volume of the targeted public company through, inter alia, wash and matched trades, press releases and paid stock promotions. When the target company’s share price reached desirable levels, the individuals sold their free trading shares for substantial financial gain.

12. Wash trades were purchases and sales of securities that matched each other in price, volume and time of execution, and involved no change in beneficial ownership. For example, a wash trade took place when Investor A bought 100 shares at \$5.00 per share of Company A through Broker A while simultaneously selling 100 shares at \$5.00 per share of Company A through Broker B. Matched trades were similar to wash trades but involved a related third person or party who placed one side of the trade. For example, a matched trade took place when Investor A bought 100 shares at \$5.00 per share of Company A through a broker, while Investor B, who coordinated with Investor A, simultaneously sold 100 shares at \$5.00 per share of Company A through a broker. Both wash trades and matched trades were used to create the appearance that the stock price and volume rose as a result of genuine market demand for the securities.

III. The Fraudulent Schemes

A. Overview

13. On or about and between May 2016 and January 2019, the defendant BRUCE SCHOENGOOD, together with others, engaged in a scheme to defraud MFST investors by manipulating the volume of MFST stock and concealing the sale of that stock by others, in part for SCHOENGOOD's own benefit. Specifically, SCHOENGOOD entered into a sham consulting agreement with Co-Conspirator 1 so that Co-Conspirator 1 would appear to be working for MFST. SCHOENGOOD then transferred MFST stock to Co-Conspirator 1 pursuant to U.S. Securities and Exchange Commission (SEC) Form S-8 ("Form S-8") in contravention of the Form S-8 registration requirements, and made false statements in public filings and related filings to enable the shares to be deposited and sold by Co-Conspirator 1, so that Co-Conspirator 1 and Investment Relations Firm 1 could participate in the undisclosed promotion of MFST stock. SCHOENGOOD also issued stock to co-conspirators so that the co-conspirators could sell their shares into the artificially created volume by Co-Conspirator 1 and Investment Relations Firm 1, and "kickback" portions of the proceeds to SCHOENGOOD without disclosing said kickbacks to the SEC or the public.

14. The defendant BRUCE SCHOENGOOD, together with others, manipulated the trading volume of MFST to create the false and misleading appearance of active trading in the stock and the false and misleading appearance that the market had an interest in MFST stock by (a) conducting "matched trades," which were orders to buy or sell securities entered with knowledge that a prearranged matching order on the opposite side of the transaction has been or will be entered; (b) engaging in "wash trades" in the MFST stock,

which is buying and selling the stock in a coordinated manner from accounts controlled by the same individual; and (c) paying co-conspirators to buy the stock so as to create artificial support for the stock.

15. The defendant BRUCE SCHOENGOOD coordinated the kickback portion of the scheme in two ways: (a) through Co-Conspirator 2, who received MFST shares at a deep discount to the market price of MFST, and who was able to receive, deposit and sell the shares through various efforts by SCHOENGOOD, and (b) through an individual whom SCHOENGOOD believed to be the point person for corrupt stockbrokers, but who was in fact an undercover agent of the FBI (the “UC”).

B. MFST Fraud Scheme

16. In the fall of 2016, Co-Conspirator 2 introduced the defendant BRUCE SCHOENGOOD to Co-Conspirator 1 and Investment Relations Firm 1, a company connected to Co-Conspirator 1, to promote MFST stock to potential investors.

SCHOENGOOD hired Investment Relations Firm 1 to promote MFST stock.

17. SCHOENGOOD compensated Investment Relations Firm 1 by arranging the transfer of millions of MFST shares to Co-Conspirator 1. To that end, on or about December 16, 2016, Co-Conspirator 1 received approximately 7.9 million shares of MFST into his personal brokerage account at Brokerage Firm 1. SCHOENGOOD caused the shares to be delivered to Co-Conspirator 1, which were issued under Form S-8, allowing Co-Conspirator 1 to immediately sell the shares he received to the public without any restrictions.

18. The defendant BRUCE SHOENGOOD and Co-Conspirator 1 entered into this arrangement for Co-Conspirator 1 to receive MFST shares in exchange for Investor

Relations Firm's 1 promotional activities in order to circumvent SEC regulations involving Form S-8. Form S-8 expressly stated that it could only be used to register securities issuances to people who provide "bona fide services" to the company issuing the stock when the services "do not directly or indirectly promote or maintain a market for the" company's securities. In reality, SCHOENGOOD was issuing the shares to Investment Relations Firm 1 to run the MFST promotion, but since that would be prohibited under the Form S-8 registration requirements, SCHOENGOOD issued the shares via a Form S-8 to Co-Conspirator 1, who, as discussed infra, shared the proceeds of the related MFST sales with Investment Relations Firm 1.

19. The defendant BRUCE SCHOENGOOD caused additional Form S-8 issuances of stock to Co-Conspirator 1 during the scheme, in order to continue to employ Co-Conspirator 1 to secretly assist in the "pump" of MFST share price and volume, with the defendant reiterating the false statements above which were needed to both issue the stock to Co-Conspirator 1 and allow Co-Conspirator 1 to deposit the stock. For example, on or about December 13, 2017, Co-Conspirator 1 received approximately 3.1 million MFST shares; on or about February 6, 2017, Co-Conspirator 1 received approximately 5 million MFST shares; and on or about March 6, 2017, Co-Conspirator 1 received approximately 4 million MFST shares.

20. To conceal this arrangement, on or about December 8, 2016, the defendant BRUCE SCHOENGOOD and Co-Conspirator 1 entered into a sham agreement stating that Co-Conspirator 1 received the approximately 7.9 million MFST shares for "consulting services" (the "2016 Consulting Agreement"). Under the 2016 Consulting Agreement, Co-Conspirator 1 claimed to act as a "business development" consultant to

MFST for six months in exchange for 11 million shares of MFST common stock in an issuance that MFST would register on Form S-8. Both SCHOENGOOD and Co-Conspirator 1 specifically covenanted in the 2016 Consulting Agreement that Co-Conspirator 1 was “not involved in stock promoting MFST.” Co-Conspirator 1 further stated in the filing documents that he was “unaware” of any stock promotion involving MFST. The filing documents also did not disclose Co-Conspirator 1’s affiliation with Investment Relations Firm 1.

21. In addition to the sham 2016 Consulting Agreement, the defendant BRUCE SCHOENGOOD and Co-Conspirator 1 made a number of false and misleading statements to conceal their arrangement, including the following:

a. In a “Deposited Securities Representation” form, which was filed in connection with Co-Conspirator 1 receiving approximately 7.9 million MFST shares on or about December 16, 2016, Co-Conspirator 1 stated that he “is not engaged in any joint, collaborative, parallel, orchestrated, or coordinated action with any person toward a common goal regarding the Securities.”

b. In a “Customer Consulting Services Representations” document, which was filed in connection with Co-Conspirator 1 receiving approximately 7.9 million MFST shares on or about December 16, 2016, Co-Conspirator 1 stated that the type of “services” he provided to MFST were “Business Development” services.

c. In an email to Brokerage Firm 1, an entity whose identity is known to your deponent, which was sent in connection with Co-Conspirator 1 receiving approximately 7.9 million MFST shares on or about December 16, 2016, Co-Conspirator 1 stated, “I am not involved or aware in any stock promotion with Medifirst Solutions, Inc.”

d. In an email to Brokerage Firm 1, which was sent in connection with Co-Conspirator 1 receiving approximately 7.9 million MFST shares on or about December 16, 2016, SCHOENGOOD stated, “[Co-Conspirator 1] has been engaged as a consultant to the company as per our Consulting Agreement, his duties are not related to fundraising, market awareness, or Investor Relations.”

e. In a “Deposited Securities Representation” form, dated on or about January 19, 2017, which was sent in connection with Co-Conspirator 1 receiving approximately 3.1 million MFST shares on or about January 20, 2017, Co-Conspirator 1 stated that he “is not engaged in any joint, collaborative, parallel, or orchestrated, or coordinated action with any person toward a common goal regarding the Securities.”

f. In a “Customer Consulting Services Representations” document, which was sent in connection with Co-Conspirator 1 receiving approximately 3.1 million MFST shares on or about January 20, 2017, Co-Conspirator 1 stated that the type of “services” he provided to MFST were “Business Development” services.

g. In an email to Brokerage Firm 1, which was sent in connection with Co-Conspirator 1 receiving approximately 3.1 million MFST shares on or about January 20, 2017, Co-Conspirator 1 stated, “I, Co-Conspirator 1, am not involved in any stock promotion or capital raising with Medifirst Solutions, Inc.”

h. In a “Deposited Securities Representation” form, which was sent in connection with Co-Conspirator 1 receiving approximately 5 million MFST shares on or about February 3, 2017, Co-Conspirator 1 stated that he “is not engaged in any joint, collaborative, parallel, orchestrated, or coordinated action with any person toward a common goal regarding the Securities.”

i. In an email to Brokerage Firm 1, which was sent in connection with Co-Conspirator 1 receiving approximately 5 million MFST shares on or about February 3, 2017, Co-Conspirator 1 stated “I, Co-Conspirator 1, am not involved in any stock promotion or capital raising with Medifirst Solutions, Inc.”

22. On or about and between December 16, 2016 and May 1, 2017, Co-Conspirator 1 sold at least 19 million MFST shares issued to him under the 2016 Consulting Agreement. Co-Conspirator 1 received approximately \$125,000 in proceeds from these sales.

23. In or about December 2016, the defendant BRUCE SCHOENGOOD offered to transfer MFST stock through SCHOENGOOD’s relative (“Relative 1,” an individual whose identity is known to your deponent) to Co-Conspirator 2 in exchange for kickbacks from the sales proceeds. Co-Conspirator 2 agreed with SCHOENGOOD to split the sales proceeds of MFST stock evenly, less what Co-Conspirator 2 needed to cover taxes on the sales proceeds. SCHOENGOOD arranged for Relative 1 to sell a MFST note worth \$2,000 to Co-Conspirator 2 for \$500. In or about and between January 2017 and February 2017, SCHOENGOOD facilitated the conversion of the MFST note into approximately 9.9 million shares of MFST common stock.

24. In or about and between January 2017 and May 2017, Co-Conspirator 2 sold approximately 9.5 million shares of MFST stock for approximately \$72,000, and paid SCHOENGOOD approximately \$23,000 from the MFST sales proceeds. During this period, Co-Conspirator 2 met with SCHOENGOOD in New Jersey on several occasions to provide SCHOENGOOD’s kickbacks to him in cash. SCHOENGOOD never disclosed that

Co-Conspirator 2 paid him kickbacks from sales of MFST stock and never disclosed that he was using Co-Conspirator 2 to sell MFST stock.

25. The defendant BRUCE SCHOENGOOD also had family members sell MFST stock. For example, in or about and between January 2017 and May 2017, Relative 1 sold approximately 735,000 shares of MFST stock for approximately \$7,139 and another SCHOENGOOD relative, Relative 2, whose identity is known to your deponent, sold 69,077,788 shares of MFST stock for approximately \$379,495. SCHOENGOOD never disclosed these sales of MFST stock by his relatives.

26. In or about and between January 2017 and May 2017, at least 30 investors in the Eastern District of New York purchased approximately 6 million shares of MFST stock.

C. MFST Matched Trade Scheme

27. On or about July 18, 2017, Co-Conspirator 2 was arrested and began cooperating with the government.

28. In or about and between August 2017 and November 2017, the defendant BRUCE SCHOENGOOD entered into an arrangement with Co-Conspirator 2 to have a corrupt broker (who in fact was an undercover FBI agent, the UC) purchase MFST stock to artificially inflate the price of MFST stock. In total, the UC purchased approximately 10.6 million shares of MFST stock.

29. On or about August 23, 2017, the defendant BRUCE SCHOENGOOD and Co-Conspirator 2 discussed the scheme on a telephone call, which Co-Conspirator 2 recorded at the direction of law enforcement. During the telephone call, SCHOENGOOD agreed to conduct a matched trade between Relative 2 and a covert account controlled by the

UC. On that same day, Relative 2's account was involved in a matched trade of 500,000 MFST shares with the UC, whose brokerage account was located in the Eastern District of New York.

30. On or about September 11, 2017, the defendant BRUCE SCHOENGOOD and Co-Conspirator 2 had a telephone call, which Co-Conspirator 2 recorded at the direction of law enforcement. During the telephone call, SCHOENGOOD and Co-Conspirator 2 discussed artificially supporting the MFST share price by having Co-Conspirator 2 buy the stock on the open market and conduct a matched trade. On that same day, Relative 2's account was involved in a matched trade of 500,000 MFST shares with the UC, whose brokerage account was located in the Eastern District of New York.

31. On or about September 19, 2017, the defendant BRUCE SCHOENGOOD and Co-Conspirator 2 met in person, and Co-Conspirator 2 recorded the meeting at the direction of law enforcement. During the meeting, they discussed the "buys" executed by the purported corrupt broker. SCHOENGOOD told Co-Conspirator 2 that he would issue Co-Conspirator 2 shares of MFST via a Form S-8 filing, along with other free-trading shares in the near future, and that Co-Conspirator 2 could sell those Form S-8 shares and use that money to pay the purported corrupt broker for executing the MFST match trades. SCHOENGOOD also requested that Co-Conspirator 2 sign another sham consulting agreement (the "2017 Consulting Agreement"). The 2017 Consulting Agreement stated that Co-Conspirator 2 would provide "business development" services to MFST. The 2017 Consulting Agreement did not state its actual purpose: to provide Co-Conspirator 2 with Form S-8 MFST shares in order to compensate the purported corrupt broker conducting match trades.

32. On or about October 24, 2017, the defendant BRUCE SCHOENGOOD spoke with Co-Conspirator 2 over the telephone, and Co-Conspirator 2 recorded the conversation at the direction of law enforcement. During the telephone call, SCHOENGOOD requested that Co-Conspirator 2 have the UC purchase additional MFST stock “because I think we need a little boost.” The next day, on or about October 25, 2017, the UC purchased approximately 3.4 million shares of MFST stock, using a brokerage account located in the Eastern District of New York.

33. On or about October 26, 2017, the defendant BRUCE SCHOENGOOD spoke with Co-Conspirator 2 over the telephone, and Co-Conspirator 2 recorded the conversation at the direction of law enforcement. During the telephone call, SCHOENGOOD requested that Co-Conspirator 2 have the UC purchase additional MFST stock. That same day, the UC purchased approximately 579,000 shares of MFST stock, using a brokerage account located in the Eastern District of New York.

34. On or about October 27, 2017, the defendant BRUCE SCHOENGOOD spoke with Co-Conspirator 2 over the telephone, which Co-Conspirator 2 recorded at the direction of law enforcement. During the telephone call, SCHOENGOOD directed Co-Conspirator 2 to make certain trades in MFST stock at certain prices. That same day, the UC purchased approximately 2.8 million shares of MFST, using a brokerage account located in the Eastern District of New York.

35. On or about November 3, 2017, the defendant BRUCE SCHOENGOOD and Co-Conspirator 2 met in person, and Co-Conspirator 2 recorded that meeting at the direction of law enforcement. During the meeting, SCHOENGOOD and Co-

Conspirator 2 discussed the MFST purchases and how much SCHOENGOOD owed the purported corrupt broker.

36. On or about November 15, 2017, the UC purchased 3 million shares of MFST stock, using a brokerage account located in the Eastern District of New York.

37. On or about November 17, 2017, the defendant BRUCE SCHOENGOOD met with Co-Conspirator 2 in person, and Co-Conspirator 2 recorded the meeting at the direction of law enforcement. During the meeting, SCHOENGOOD gave Co-Conspirator 2 \$1,600 in cash as a kickback to the UC, and explained that they would falsely characterize that payment as for “consulting services.”

38. On or about November 28, 2017, the defendant BRUCE SCHOENGOOD met with Co-Conspirator 2 in person, and Co-Conspirator 2 recorded that meeting at the direction of law enforcement. During the meeting, SCHOENGOOD asked Co-Conspirator 2 to have “his guy” buy MFST in order to support the stock, and gave Co-Conspirator 2 \$300 in cash as additional payment for earlier MFST stock purchases made by the purported corrupt broker.

39. On or about December 5, 2017, the defendant BRUCE SCHOENGOOD met with Co-Conspirator 2 in person, and Co-Conspirator 2 recorded that meeting at the direction of law enforcement. During the meeting, SCHOENGOOD gave Co-Conspirator 2 \$300 cash as a kickback for earlier MFST stock purchases made by the purported corrupt broker. SCHOENGOOD also took a telephone call from Co-Conspirator 1 during the meeting, which he put on speaker phone so that Co-Conspirator 2 could hear it. Co-Conspirator 1 asked SCHOENGOOD to put out a press release on Thursday, December 7, 2017. SCHOENGOOD asked Co-Conspirator 1 if he had time “this week to speak to my

guy,” a reference to Co-Conspirator-2. Co-Conspirator 1 agreed to speak with Co-Conspirator 2 and stated that he hoped “that news release will come out today. We need something to kick start us pretty good.” SCHOENGOOD said the news release would come out on Thursday. Co-Conspirator 1 responded, “Let’s do it Thursday. I mean, it takes a week or two to for my guys to really start ramping up . . . start building the momentum. That’s how it kind of works with the phone calls. You start with one, two, ten people . . . they get other people. You talk about it, then they see it start trading, then they start jumping on and chase it. You know how psychology works.” After Co-Conspirator 1 hung up on the telephone, Co-Conspirator 2 asked SCHOENGOOD what press release was coming out. SCHOENGOOD responded, “I don’t know . . . I’ll think of something” and laughed.

40. On or about December 19, 2017, the defendant BRUCE SCHOENGOOD had a telephone call with Co-Conspirator 2 via an encrypted application, and Co-Conspirator 2 recorded the call at the direction of law enforcement. SCHOENGOOD asked Co-Conspirator 2 to have “his guy” buy 10 million shares of MFST. SCHOENGOOD also asked Co-Conspirator 2 how much it would cost to pay the “guy” to make those purchases, to which Co-Conspirator 2 replied, “\$700.” SCHOENGOOD thereafter told Co-Conspirator 2 to have “his guy” do by the 10 million shares of MFST and to pay for the buying by selling stock that SCHOENGOOD had given Co-Conspirator 2 pursuant to a Form S-8.

41. On or about February 9, 2018, the defendant BRUCE SCHOENGOOD called Co-Conspirator 2 on the telephone via an encrypted application, and Co-Conspirator 2 recorded the call at the direction of law enforcement. SCHOENGOOD asked Co-Conspirator 2 to have “his guy” purchase MFST stock at a certain price.

42. On or about March 15, 2018, the defendant BRUCE SCHOENGOOD met with Co-Conspirator 2 in person, and Co-Conspirator 2 recorded the meeting at the direction of law enforcement. During the meeting, SCHOENGOOD gave Co-Conspirator 2 \$300 cash, as the kickback for the stock purchases made on or about February 9, 2018 by the UC.

43. In total, in or about and between May 2016 and January 2019, the brokerage accounts in the name of Relative 2 sold approximately 257,245,628 shares of MFST stock, netting approximately \$880,258.95.

WHEREFORE, your deponent respectfully requests that the defendant BRUCE SCHOENGOOD be dealt with according to law. Because public filing of this document could result in a risk of flight by SCHOENGOOD, as well as jeopardize the government's ongoing investigation, your deponent respectfully requests that this complaint, as well as the arrest warrant issued in connection with this complaint, be filed under seal.

KURTDENGLER
Special Agent, Federal Bureau of Investigation

Special Agent Kurt Dengler attested to this Affidavit by
telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on February 19, 2021

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