

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America  
v.

Benjamin Tucker Patz,  
a/k/a "Parlay Patz"

Case No.

8:20 MJ1209TGW

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 20, 2019 in the counties of Pinellas in the Middle District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 875(c)	Transmitting threats in interstate or foreign commerce

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

*Nowak*

Complainant's signature

Daniel A. Nowak, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: Feb. 24, 2020

*Thomas G. Wilson*

Judge's signature

City and state: Tampa, Florida

THOMAS G. WILSON, U.S. Magistrate Judge

Printed name and title

I, Daniel A. Nowak, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since 2016. Prior to joining the FBI, I was a police officer with the St. Charles Police Department in Missouri for six years. In connection with my official duties as a Special Agent with the FBI, I investigate a variety of criminal violations of federal laws, including violent crimes. As the case agent, I am fully familiar with the facts of this case and I have previously participated in numerous investigations involving threats and harassment through the use of online platforms. Furthermore, during these and other investigations, I have reviewed evidence received from online platforms and consulted with other agents and law enforcement officers who have seized and/or reviewed evidence from computers and online platforms.

2. As an FBI Special Agent, I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7). I am empowered by law to conduct investigations of, and to make arrests for, violations of federal statutes regarding the transmission of threats, including violations of 18 U.S.C. § 875(c).

3. This affidavit is submitted in support of a criminal complaint charging **Benjamin Tucker PATZ**, a/k/a “Parlay Patz,” with transmitting threats in interstate or foreign commerce, in violation of 18 U.S.C. § 875(c).

4. I have been personally involved in the investigation of this matter. This affidavit is based on information obtained from law enforcement and government personnel, witness statements, my personal knowledge and observations, and my examination of various reports, documents, electronic data, and other records. Unless otherwise indicated, when the contents of a document or an individual’s statement are reported herein, they are reported in substance and part and are not intended to be a verbatim recitation of the document or statement. Because this affidavit is being submitted for the limited purpose of establishing probable cause to believe that the above offense has been committed and that **PATZ** committed it, it does not include all of the facts known to me or other government personnel. When a date is listed, I mean that the event occurred “on or about” that date. When a time period is listed, I mean that the event occurred “in or around” that time period.

## II. PROBABLE CAUSE

### A. INITIAL INVESTIGATION

5. Instagram, LLC, (“Instagram”), is a social-networking provider owned by Facebook, Inc. (“Facebook”) and headquartered in Menlo Park, California.

6. On March 9, 2019, C.R., a college basketball player for Pepperdine University, received four Instagram direct messages from Instagram handle *@b82hs9*. The messages stated, respectively, “Your throat will be severed open with a dull knife,” “Your entire family will be beheaded and burned alive,” “I will enter your home as you sleep and kill you,” and “Watch your back, you’re a dead man walking.”

7. On March 10, 2019, an Emergency Disclosure Request (“EDR”) was submitted to Facebook, Inc. for subscriber information for the *@b82hs9* Instagram account. Facebook’s response indicated that the account had been registered on September 30, 2018, with the email address *benpatz1996@gmail.com*. On March 10, 2019, an EDR was submitted to Google LLC (“Google”) for information concerning that email account. Google’s response indicated that the account had been registered in the name “Ben Patz” with the recovery email address *ben.patz@yahoo.com* and phone SMS (i.e., text message) number

+17073151768. This account had last logged in on March 9, 2019, using the IP (“Internet Protocol”) address 108.46.233.16.

8. Records checks indicate that **PATZ** was born in 1996 and holds a California driver’s license.

**B. THREATS TO PROFESSIONAL ATHLETES**

9. On July 4, 2019, F.G., a professional baseball player for the Toronto Blue Jays, received two Instagram direct messages from @b82hs9. The messages stated, respectively, “I WILL BEHEAD YOU NIGGER,” and “I WILL GAS YOUR DAUGHTERS AND THEN SEVER THEIR THROATS OPEN WITH A DULL KNIFE.”

10. On July 20, 2019, C.R., a professional baseball player for the Tampa Bay Rays, received an Instagram direct message from Instagram handle @jeanlucricharde. The message stated, “Your family will be beheaded.” When he opened the Instagram direct message, C.R. was located at his residence in the Middle District of Florida.

11. On July 20, 2019, B.M., who is the girlfriend of J.D., a professional baseball player for the Atlanta Braves, received two Instagram direct messages from @jeanlucricharde. The messages stated, respectively, “Your husband will be beheaded,” and “I’ll enter your home while you sleep and end both of you.”

12. On July 27, 2019, M.F., a professional baseball player for the Atlanta Braves, received two Instagram direct messages from Instagram handle *@applesnsfufd*. The messages stated, respectively, "I'll behead you and your family," and "I'll sever your neck open with a dull knife."

13. On July 28, 2019, L.H., a professional baseball player for the Oakland Athletics, received an Instagram direct message from *@applesnsfufd*. The message stated, "I will behead you and your family." Within one minute of the previous message, K.H., the wife of L.H., received four Instagram direct messages from *@applesnsfufd*. The messages stated, respectively, "I am going to sever your husbands neck open," "You and him will be dismembered together," "I will enter your home while you and your fuckwad husband sleep and I will bind you to your bed and sever your necks," and "Prepare yourself."

14. On July 29, 2019, H.R., a professional baseball player for the San Diego Padres, received an Instagram direct message from *@applesnsfufd*. The message stated, "I WILL BEHEAD YOUR FAMILY." At approximately the same time, C.R., the wife of H.R., received two Instagram direct messages from *@applesnsfufd*. The messages stated, respectively, "I will cut open your husband with a dull knife," and "I will sever you and him open."

15. Based on my training and experience, as well as my review of the relevant evidence in this investigation, I believe that **PATZ** transmitted these

messages and that he did so for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat.

**C. SEARCH WARRANT EVIDENCE OF PATZ'S IDENTITY**

16. On August 9, 2019 a subpoena was issued for the three Instagram accounts that had sent the threatening messages: *@b82hs9*, *@jeanlucricharde*, and *@applesnsfufd*. The subpoena results identified *benpatz1996@gmail.com* as the email address on file for the Instagram accounts *@b82hs9* and *@jeanlucricharde*. The subpoena results also identified *benpatz06@gmail.com* as the email address on file for Instagram account *@applesnsfufd*. I have also obtained the Internet Protocol ("IP") addresses associated with the creation of the Instagram accounts and certain logins from them. The IP addresses were linked to internet providers in Vallejo, California; Napa, California; Bellevue, Washington; Chatillon, France; and Paris, France. Additionally, the phone number provided for verification of the *@applesnsfufd* Instagram account was +17073151768. This is the same phone number that Google provided for the email account *benpatz1996@gmail.com*, and the (707) area code corresponds to northwestern California, including Vallejo and Napa.

17. On September 25, 2019, United States Magistrate Judge Amanda Sansone, of the Middle District of Florida, issued search warrants for the email accounts *benpatz1996@gmail.com* and *benpatz06@gmail.com*, as well as the

Instagram accounts *@b82hs9*, *@jeanlucricharde*, and *@applesnsfufd*. Based on the material that Instagram provided in response to the warrants, I subsequently learned that *@b82hs9* and *@jeanlucricharde* were actually the same account, but the display name, or handle, had simply been changed.<sup>1</sup>

18. A review of direct messages stored on the targeted Instagram accounts revealed approximately 307 total other accounts that the targeted accounts had messaged, with nearly all the accounts receiving threatening and explicit messages. Almost all those accounts appeared to belong to professional or collegiate athletes, or to a family member or significant other of those athletes.

19. Information from Google indicated that *ben.patz@yahoo.com* was the recovery email account for both *benpatz1996@gmail.com* and *benpatz06@gmail.com*. Although most of the emails sent to/from *benpatz1996@gmail.com* and *benpatz06@gmail.com* appear to have been simply “junk” mail, such as notifications for Instagram and Twitter pages, a few emails in the accounts helped to identify **PATZ** as their common owner. These include an email that referenced a PayPal account for “Kimberly Patz” with an address in Napa. Furthermore, on May 21, 2018, an email was sent to a Columbia University professor in which “Ben Patz” advised that he was completing finals at his

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<sup>1</sup> For the sake clarity, this account will hereafter be referred to simply as *@b82hs9*.



university in Paris, but that he would be back in the United States in time for class. Another email, on August 28, 2018, contained a forwarded message that read, "I, [C.Y.] will be hosting my friend Benjamin Patz during the entirety of his studies in Paris, France beginning on his arrival to France on September 7, 2018 at my home: [address redacted], Paris FR 75006."<sup>2</sup> As noted above, IP addresses received for the Instagram accounts revealed that @b82hs9 and @applesnsfufd had registered for accounts and/or logged in from IP addresses located in Chatillon (September 30, 2018) and Paris (October 17, 2018 and February 24, 2019). Additionally, there were multiple emails received from LinkedIn for a profile belonging to "Dominique Hoppers," who is listed as the CEO of Lakeworth Holdings. An online search of Lakeworth Holdings revealed a company that lists "Ben Patz" as the co-founder and chairman. A biography page states that "Ben Patz is the co-founder and chairman of Lakeworth Holdings LLC in New York City...Ben attended Columbia Business School and the American University in Paris."

20. On December 17, 2019, Magistrate Judge Sansone issued a search warrant for the email account *ben.patz@yahoo.com*.

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<sup>2</sup> According to Google Maps, Chatillon, France is located approximately 30 minutes south of the American University of Paris, by car.

21. A review of the material produced in response to the warrants revealed that the account was registered to “Ben Patz” with a birthday that is, in fact, PATZ’s date of birth. Six IP addresses used by *ben.patz@yahoo.com* matched IP addresses that were used by *@applesnsfufd*, *@b82hs9*, *benpatz1996@gmail.com*, or *benpatz06@gmail.com*. Numerous emails found in the account also contained leasing and shipping information for PATZ and “Kimberly Patz” at an apartment in New York, New York, including as recently as December 15, 2019. Additionally, on November 21, 2019, *ben.patz@yahoo.com* had received an email from *+17073151768@tmomail.net*— which contains PATZ’s phone number and a domain associated with T-Mobile—that contained pictures of PATZ’s California driver’s license and United States passport card. Moreover, on December 2, 2019, *ben.patz@yahoo.com* sent an email to *teamnocal@inspirato.com* that said, in relevant part, “I was able to book my first trip on inspirato a couple days ago, to the British Virgin Islands...I probably respond fastest to text (707) 315 1768 but email is cool too. Thanks! Ben.”

22. Emails containing flight logs, device logins, hotel confirmations, and other location-based information revealed that PATZ had likely traveled to the following locations: New York, New York; Napa; San Francisco, California; Las Vegas, Nevada; Atlantic City, New Jersey; Paris, France; Tunisia; Singapore; and the British Virgin Islands. Furthermore, on at least six occasions between May

2018 and November 2018, **PATZ** made deposits into Heritage Sports, an online sportsbook. Meanwhile, on at least four occasions in October 2019, **PATZ** made deposits into William Hill, another online sportsbook.

#### D. **PATZ'S HISTORY OF SPORTS GAMBLING**

23. On December 27, 2019, an online search revealed numerous articles written about **PATZ** and his gambling successes during November and December 2019. For example, an article titled "Parlay Patz Bets His Way To Millionaire Status After Latest Win" (available at <https://www.usaonlinesportsbooks.com/news/parlay-patz-bets-his-way-to-millionaire-status-after-latest-win.html>), posted on December 11, 2019, claimed that **PATZ** had won approximately \$1,136,434 from online wagers on sporting events between November 1, 2019 and December 8, 2019. The article also noted that **PATZ** had joined the William Hill sportsbook on October 9, 2019, and that he is a 23-year-old college student who lives in New York and travels to New Jersey to make his wagers.

24. Another article, titled "Famous Sports Bettors: Ben 'Parlay Patz' Patz Bio" (available at <https://www.legalsportsbetting.com/famous-sports-bettors/ben-parlay-patz/>), which was updated on December 18, 2019, claimed that **PATZ** was born in 1996 and joined an offshore sportsbook to place bets when he turned 18. That article noted the following about **PATZ**: 1) he attended the American University of Paris and also the Columbia University Business School; 2) he

became the chairman and co-founder of Lakeworth Holdings, which claims to be an international investment company based out of New York; and 3) his two favorite sports to wager on are football and basketball, including collegiate and professional teams.

25. A third article, titled “50 Days, \$1.1 Million in Winnings and One Wild Ride: A Day Inside the ‘Parlay Patz’ Phenomenon” (available at <https://www.actionnetwork.com/news/parlay-patz-darren-rovell-sports-betting-12-16-2019>), posted on December 17, 2019, claimed that PATZ had studied abroad in Paris and had moved to New York city to attend Columbia University. That article further stated that PATZ had joined the William Hill sportsbook primarily because its European customer base let him bet on lower-level tennis events, which PATZ had an interest in. According to the article, PATZ had been expected to leave Columbia University and the New York area “at the end of the quarter” to return to California. Furthermore, the article claimed that the Golden State Warriors are PATZ’s favorite NBA team and that PATZ had recently created a new Instagram account. Additionally, it claimed that PATZ had used his winnings to purchase a new Mercedes C63 coupe and to charter a jet to take himself and three friends to the British Virgin Islands. The article also included the following quote from PATZ, referencing the fact that Twitter had suspended an account that he previously had with that site: “Maybe it’s good I couldn’t get

a Twitter account because I'd probably go back at people. At the end of the day though, my life has improved because of the techniques I've used that have won me all this and what anyone has to say about it doesn't really change that."

26. A check of online social media revealed an additional Instagram account for PATZ, identified as *@parlaypatz*, which had a display name of "Ben Patz." The oldest post was made approximately two years ago, and recent posts displayed PATZ's vacation to the British Virgin Islands, including his chartered flight, and his new Mercedes C63.

27. On January 3, 2020, United States Magistrate Judge Thomas Wilson, of the Middle District of Florida, issued a search warrant for the Instagram account *@parlaypatz*.

28. A review of the material produced in response to the warrant revealed that the account was registered to "Ben Patz" with phone number +17073151768. Multiple direct messages sent from *@parlaypatz* further identified his phone number as (707) 315-1768. Six IP addresses used by *@parlaypatz* matched IP addresses that were used by *@applesnsfufd*, *@b82hs9*, *benpatz1996@gmail.com*, *benpatz06@gmail.com*, or *ben.patz@yahoo.com*. Multiple messages and story posts by *@parlaypatz* indicated that he uses the William Hill sportsbook to place wagers, that he currently lives in New York—but had

previously lived in France and California—and that he has attended Columbia University.

29. Approximately 18 messages from *@parlaypatz* had been sent to collegiate and professional football and basketball athletes. Several messages referenced unsuccessful bets that had been placed on those athletes' teams. For example, on November 24, 2019, *@parlaypatz* sent a message to D.M., a college football player for the University of Oregon, that said, "That defense costed my 30k man."

30. On December 22, 2019, *@parlaypatz* sent a message to C.J., a college basketball player for the University of Arizona, that said, "Your worthlessness costed me over 100,000\$ tonight! Sad!!" C.J. responded, "Gambling is a dangerous habit. You're addicted. Stop it. Get some help!" Later, *@parlaypatz* replied, "I'm doing just fine, over one million this month!"

31. On October 23, 2019, *@parlaypatz* sent a screenshot of his betting picks, which included betting on the University of Southern California ("USC") to beat the University of California, Los Angeles, in college football. That same day, *@parlaypatz* sent messages to USC players, A.S. and B.A., that said, respectively, "Use your head dude... not smart at all," and "Please, drop another pass why don't you." *@parlaypatz* also messaged another Instagram user and said, "I have 30k on fucking USC and they're stressing me the fuck out."

32. On October 29, 2019, *@parlaypatz* exchanged messages with *@darrenrovell*, which is the Instagram account for Darren Rovell, a sports business analyst who currently works for The Action Network. In relevant part, *@darrenrovell* said, "Ok. You can give me your name just so I can check with William Hill right." *@parlaypatz* replied "Benjamin Patz." *@darrenrovell* then asked, "Give me your number... Want you try to get to you sometime today," and *@parlaypatz* replied, "Sounds good. 7073151768."

33. That same day, *@parlaypatz* exchanged messages with another Instagram user, who appears to be a sports betting consultant. That user had asked, "Let me know your phone number and we'll get started," and *@parlaypatz* replied "7073151768, text me."

34. On December 1, 2019, *@parlaypatz* sent messages to another Instagram that said, "Everyone calls me a pussy for taking heavy favorites. Lol I just think to myself, this is why I've had success and they haven't lol...Soooooo many haters."

35. On February 3, 2019, *@parlaypatz* posted a screenshot containing a bet placed with Heritage Sports for Super Bowl LIII between the New England Patriots and the Los Angeles Rams, which was to occur the same day. The betting ticket appeared to be a wager of \$10,000 on the Los Angeles Rams to win. Ultimately, however, the New England Patriots won the game 13-3. The same

day, J.E., a professional football player for the New England Patriots, received an Instagram direct message from @b82hs9 that said, "ILL RAPE AND MURDER YOUR ENTIRE FAMILY." Also that same day, R.G., a professional football player for the New England Patriots, received Instagram direct messages from @b82hs9 that said, respectively, "I WILL BRUTALLY RAPE AND MURDER YOUR FAMILY," and, "I WILL ENTER YOUR HOME WHILE YOU SLEEP AND SEVER YOUR NECK OPEN WITH A DULL KNIFE."

36. The above information corroborates that PATZ likely sent the Instagram threats from the @b82hs9 and @applesnsfufd accounts and provides a potential motive for his sending of threatening communications to professional athletes. His substantial and persistent online sports wagering suggests that PATZ may have threatened athletes who played in games on which he had unsuccessfully wagered and lost money—or that he may have tried to influence the outcome of upcoming sporting events on which he had wagered.



**E. ADDITIONAL THREATS AND CORRESPONDING GAMBLING ACTIVITY**

37. On January 7, 2020, a subpoena was issued to the William Hill sportsbook in Nevada. In response to the subpoena, William Hill produced, among other items, a handwritten enrollment form for PATZ that contained his date of birth, his address in Napa, phone number (707) 315-1768, the email address *ben.patz@yahoo.com*, and his California driver's license number. The application also contained a "selfie" picture of PATZ.

38. William Hill also provided betting information for PATZ. The records included a parlay wager that PATZ had placed on June 29, 2019, on Francis Ngannou (a mixed martial artist), Germany (believed to be the German Women's World Cup team), the Philadelphia Phillies, Los Angeles Dodgers, and Cleveland Indians. That same day, Germany lost to Sweden in the Women's World Cup Quarterfinal. Also that same day, H.L., a professional soccer player for the Swedish women's soccer team, received two Instagram direct messages from *@b82hs9*. The messages said, respectively, "I'm going to rape and dismember you" and "I will sever your aorta while you sleep."

39. Also on June 29, 2019, the Cleveland Indians lost a baseball game to the Baltimore Orioles. That same day, Z.P., a professional baseball player for the Cleveland Indians, received an Instagram direct message from *@b82hs9* that said, "You and your family will die." Additionally, A.S., a professional baseball

player for the Baltimore Orioles, received two Instagram direct messages from @b82hs9 that said, respectively, “Hola wetback” and “I’m going to behead you and your entire family.” Also on the same day, J.V., a professional baseball player for the Baltimore Orioles, received two Instagram direct messages from @b82hs9 that said, respectively, “I will enter your home while you sleep and sever your neck open with a dull knife” and “I will brutally murder your daughter.”

40. On July 20, 2019, the Tampa Bay Rays lost a home baseball game to the Chicago White Sox. The game took place at Tropicana Field, in the Middle District of Florida. That same day, four professional baseball players for the Tampa Bay Rays—E.P., A.K., T.P., and C.R.—as well as a professional baseball player for the Chicago White Sox, A.C., received Instagram direct messages from @b82hs9.<sup>3</sup> The messages included the following threats, among others:

- To E.P.: “I will sever your neck open you pathetic cuntbag,” “I will enter your home while you sleep,” “And sever your neck open,” “I will kill your entire family,” “Everyone you love will soon cease,” “I will cut up your family,” and “Dismember then alive”;
- To A.K.: “Your family’s necks will be severed open with a dull knife!” and “Your family will die!”;
- To T.P.: “Unfortunately 0-5 against the Chicago White Sox isn’t going to cut it. Because of your sins, I will have to behead you and your family”;

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<sup>3</sup> The threat to C.R. is also discussed above at paragraph nine.

- To C.R.: “Your family will be beheaded”; and
- To A.C.: “I WILL BEHEAD YOUR FAMILY YOU DIRTY WETBACK.”

41. Tropicana Field is located in St. Petersburg, Florida. According to publicly available records, the game started at approximately 6:10 p.m. ET and lasted a total of three hours and 38 minutes, ending at approximately 9:58 p.m. ET. The threatening messages started at approximately 8:47 p.m. ET and continued until 9:54 p.m. ET, while the players remained at Tropicana Field.

42. Records from Instagram show that an IP address<sup>4</sup> associated with T-Mobile and Sacramento, California—which is located approximately one hour from Napa, where PATZ has been known to reside—was logged for @b82hs9 on July 20, 2019, at approximately 9:22 p.m. ET. Records from Instagram also show that the same IP address was logged for @parlaypatz on July 21, 2019, at approximately 3:25 a.m. ET. Records from Yahoo/Oath Holdings, Inc. show that the same IP address was logged for ben.patz@yahoo.com on July 21, 2019 at 1:58 a.m. ET.

43. Records from Instagram further show that, on July 22, 20219, an IP address<sup>5</sup> associated with AT&T and Napa was logged for the @b82hs9 account at approximately 11:18 a.m. ET. Records from Instagram also show that the same

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<sup>4</sup> The IP address was as follows: 2607:fb90:271d:1213:2d7d:64f3:8dcb:c791.

<sup>5</sup> The IP address was as follows: 99.17.228.158.

IP address was logged for *@parlaypatz* on July 23, 2019, at approximately 12:59 p.m. ET. Records from Yahoo/Oath Holdings, Inc. show that the same IP address was logged for *ben.patz@yahoo.com* on July 25, 2019 at 1:01 a.m. ET.

44. Also on July 20, 2019, the Atlanta Braves lost a baseball game to the Washington Nationals. That same day, two professional baseball players for the Washington Nationals, A.E. and T.T, a professional baseball player for the Atlanta Braves, J.D., and J.D.'s girlfriend, B.M., all received Instagram direct messages from *@b82hs9*. The messages included the following threats, among others:

- To A.E.: "I will brutally murder you and your family" and "ILL SEVER YOUR NECK OPEN YOU UGLY CUNT";
- To T.T.: "I will kill everyone you love," "I will sever their necks open" "I don't joke around," "I'm coming for you and your family. Your throats will be severed with a dull knife," and "I will make sure you along with they feel more pain than any human has ever felt";
- To J.D.: "I WILL KILL YOU AND YOUR FAMILY WHILE YOU SLEEP" and "YOU RUINED THIS GAME. NOW I HAVE NO CHOICE BUT TO RUIN YOU";
- To B.M.: "Your husband will be beheaded" and "I'll enter your home while you sleep and end both of you."

45. Records from William Hill show that **PATZ** had also placed a parlay wager on July 25, 2019, on the Minnesota Twins, Cleveland Indians, Los Angeles Angels, Oakland Athletics, Seattle Mariners, and Ugo Humbert (a

professional tennis player). On July 25, 2019, the Cleveland Indians played a baseball game against the Kansas City Royals, with a start time of 5:15 p.m. PST. On the same day, at 4:32 p.m. PST, H.D., a professional baseball player for the Kansas City Royals, received two Instagram direct messages from @applesnsfufd that said, respectively, "I will cut open the throat of your baby" and "You will die." At 4:37 p.m. PST, A.G., a professional baseball player for the Kansas City Royals, received an Instagram direct message from @applesnsfufd that said, "Hope ya family dies you ugly sloth."

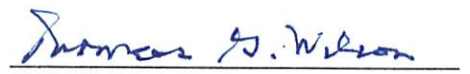
CONCLUSION

46. Based on the foregoing, there is probable cause to believe that **PATZ** has committed violations of 18 U.S.C. § 875(c). Accordingly, I request that the Court issue a warrant for his arrest as to those offenses.



Daniel A. Nowak, Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me  
this 24<sup>th</sup> day of February 2020, in Tampa, Florida.

  
THOMAS G. WILSON  
United States Magistrate Judge