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UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MICHAEL ALAN STOLLERY ("a/k/a
MICHAEL STOLLAIRE"),
15
16 Defendant.

CR No. 2:22-cr-00207-JLS

GOVERNMENT'S COMBINED
(1) CONCURRENCE IN THE FINDINGS
OF THE PRESENTENCE REPORT, AND
(2) POSITION RE SENTENCING OF
DEFENDANT MICHAEL ALAN STOLLERY

Hearing Date: November 18, 2022
Hearing Time: 9:30 a.m.
Location: Courtroom of the
Hon. Josephine L. Staton

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19 Plaintiff United States of America, by and through its counsel of
20 record, Trial Attorneys Tian Huang and Kevin Lowell, hereby files its
21 Combined (1) Concurrence in the Findings of the Presentence Report;
22 and (2) Position re Sentencing of defendant MICHAEL ALAN STOLLERY
23 ("Sentencing Position").
24

25 This Sentencing Position is based upon the attached memorandum of
26 points and authorities, the files and records in this case, and such
27 further evidence and arguments as the Court may permit.
28

1 Dated: November 4, 2022

Respectfully submitted,

2 GLENN S. LEON
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5 United States Department of Justice

/s/ Tian Huang

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MEMORANDUM OF POINTS AND AUTHORITIES

I. Introduction

Defendant MICHAEL ALAN STOLLERY developed and sold a cryptocurrency -- called BAR -- through his company Titanium Blockchain Infrastructures, Inc. ("TBIS"). This Initial Coin Offering ("ICO") was based on false and misleading statements about the functionalities of the BAR token, the status of TBIS as the sister company of EHI Internetwork and Systems Management ("EHI"),¹ and the clients of EHI that TBIS would allegedly inherit. Furthermore, STOLLERY did not register the TBIS ICO with the SEC, nor did STOLLERY have a valid exemption from the SEC's registration requirements. Defendant STOLLERY has now pleaded guilty to a single count of securities fraud.

Defendant STOLLERY obtained approximately \$21 million from dozens of investors located in at least 18 states in the United States, including California, and abroad. That fact alone would justify a significant sentence to promote respect for the law and provide just punishment for the offense, which are two of the statutory goals of sentencing. 18 U.S.C. § 3553(a)(2)(A).

Another statutory goal of sentencing, namely, the need for general deterrence to criminal conduct, also calls for a significant sentence. 18 U.S.C. § 3553(a)(2)(B). Fraudulent cryptocurrency offerings are rampant and growing. According to a report recently released by the Federal Trade Commission ("FTC"), more than 46,000 people have reported losing over \$1 billion in crypto to scams just

¹ Stollery was the President and sole Director of EHI, and the Founder, CEO, President, and sole Director of TBIS.

1 since the start of 2021.² Through the sentence it imposes, this Court
2 can and should send a clear message that the fraudulent exploitation
3 of investors -- be it through old-fashioned telemarketing boiler-rooms
4 or by promoting new, cutting-edge technologies -- will not be
5 tolerated.

6 In the Presentence Report ("PSR"), the Probation Officer found
7 that defendant STOLLERY's total post-acceptance offense level is 28.
8 In the plea agreement, the government agreed to recommend that a two-
9 level reduction, pursuant to U.S.S.G. § 3E1.1, be applied, in
10 recognition of defendant STOLLERY's acceptance of responsibility for
11 the offense up to and including the time of sentencing, and to
12 recommend, if necessary, an additional one-level reduction if available
13 under the section. ECF No. 8 ¶ 4(c). The government also agreed to
14 recommend that defendant STOLLERY be sentenced to a term of
15 imprisonment no higher than the low end of the applicable Sentencing
16 Guidelines range, which for this agreement is defined by the Sentencing
17 Table in U.S.S.G. Chapter 5, Part A. *Id.* ¶ 4(d). Finally, the
18 government also reserved the right to argue that additional adjustments
19 and departures under the Sentencing Guidelines are appropriate, and
20 request that a one-level variance pursuant to 18 U.S.C. § 3553(a) be
21 applied in recognition of defendant's early acceptance of
22 responsibility and his turning over of his illicit cryptocurrency gains
23 from the TBIS scheme and his other cryptocurrency assets that are in
24 no way linked or derived from the TBIS scheme.

25 Defendant STOLLERY is in Criminal History Category I. In
26 accordance with the plea agreement, the government recommends that the

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28 ² <https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2022/06/reports-show-scammers-cashing-crypto-craze>

1 Court vary downward from the otherwise applicable offense level of 29
2 by a total of four levels to offense level 25, resulting in a sentencing
3 range of 57-71 months, and further recommends that the Court sentence
4 defendant STOLLERY to no more than the low end of this range, namely
5 57 months. The government respectfully submits that the recommended
6 sentence appropriately balances the aggravating and mitigating factors
7 in this case.

8 **II. STATEMENT OF FACTS**

9 **A. Defendant STOLLERY's Admissions**

10 Defendant STOLLERY signed a lengthy statement of facts as part of
11 his plea agreement and, at the hearing of his plea, admitted under oath
12 that those facts were true. As described more fully below, defendant
13 STOLLERY admitted that he made a series of false and misleading
14 statements, including on the TBIS website and in a TBIS "White Paper,"
15 to solicit investors to buy BARS. ECF No. 8 ¶ 10 & Ex. B (Statement of
16 Facts); ECF No. 29.

17 **B. TBIS**

18 Defendant Stollery was the Founder, CEO, President, and sole
19 Director of TBIS, as well as the President and sole director and sole
20 owner of EHI, a company that provided technology consultancy services.
21 PSR ¶¶ 14-15. On or about August 14, 2017, STOLLERY announced on his
22 personal Twitter feed, "I just came up with a new idea for an Initial
23 Coin Offering (ICO. Blockchain developers needed. Stay tuned." ECF
24 No. 8, Ex. B ¶ 13. From that point, defendant STOLLERY increasingly
25 tweeted about digital assets generally, and embarked on a social media
26 campaign to lure investors to invest in TBIS. *Id.*

27 A few weeks after announcing that he "just came up with a new
28

1 idea" for an ICO, defendant STOLLERY mentioned TBIS for the first time.
2 *Id.* ¶ 14. One of these posts, on Facebook, depicted a picture of the
3 TBIS logo and a photo showing the cover of a TBIS "White Paper." *Id.* A
4 little over a week after these posts, defendant STOLLERY incorporated
5 TBIS, on or about October 10, 2017. *Id.*

6 On that same day, defendant STOLLERY created an official TBIS
7 Twitter account, published a link to the official TBIS Telegram channel
8 and asked his followers to join, and posted an announcement on TBIS's
9 Facebook page to a YouTube video titled, "TBIS Introduction." *Id.* ¶
10 15. Through social media, defendant STOLLERY touted TBIS as a start-up
11 company seeking to develop an IT platform using blockchain technology.
12 Defendant STOLLERY also posted an official White Paper to the TBIS
13 website in order to convince investors to invest in TBIS.

14 On or about October 30, 2017, defendant STOLLERY announced the
15 creation of a new cryptocurrency token or coin in a tweet that stated,
16 "The Titanium BAR Token, now listed on @CryptoCompare --." *Id.* ¶ 17.
17 The next day, defendant STOLLERY tweeted that the TBIS ICO had been
18 rated and listed on Coin Telegraph, a website providing news on digital
19 assets and blockchain. *Id.* Defendant STOLLERY also promoted TBIS as an
20 investment and emphasized that holders of BAR would share in TBIS's
21 future earnings and in appreciation in the value of the BAR digital
22 assets, including in a January 11, 2018 online interview in which
23 defendant STOLLERY compared investing in TBIS to purchasing Google
24 stock early on at \$75 per share. *Id.* ¶ 18.

25 From in or around November 2017 to in or around May 2018, defendant
26 STOLLERY conducted an ICO of TBIS and introduced TBIS as an investment
27 opportunity to the public through social media and the TBIS website.

28

1 *Id.* ¶ 12. However, defendant STOLLERY neither registered the ICO
2 regarding its cryptocurrency investment offering with the SEC, nor did
3 defendant STOLLERY have a valid exemption from the SEC's registration
4 requirement. *Id.*

5 **C. The Scheme to Defraud TBIS Investors**

6 Beginning at least as early as in or around November 2017, and
7 continuing through at least in or around May 2018, defendant STOLLERY
8 made or caused to be made materially false and fraudulent statements
9 and material omissions about, among other things, corporate
10 relationships, client testimonials, and the functionality of the BAR,
11 which purportedly affected -- through the operation of supply and
12 demand -- the value of BARs.

13 1. The TBIS White Paper

14 Defendant STOLLERY was the lead author of the TBIS White Papers
15 and was involved in every revision to the White Papers through at least
16 the January 16, 2018 White Paper. *Id.* ¶ 21(c). The White Papers included
17 various false or misleading statements, which defendant STOLLERY knew
18 were false or misleading, including claiming that (1) the "BAR is a
19 'utility token,'" and (2) TBIS would "simply inherit EHI's clientele,"
20 such as companies like Apple, Pfizer, the Federal Reserve Bank, and
21 Walt Disney. *Id.*

22 2. The TBIS Website

23 Similar to the White Papers, defendant STOLLERY also made a series
24 of false and misleading statements about TBIS's ability to leverage
25 EHI's purported customers on TBIS's website. Specifically, defendant
26 STOLLERY stated that TBIS would inherit EHI's purported customers, and
27 included the logos of various prominent companies, including
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1 McDonald's, Pfizer, and Microsoft, which defendant STOLLERY knew at
2 the time was false and misleading. *Id.* ¶ 21(d).

3 The TBIS Website also included a hyperlink to EHI's Website for
4 its client list and testimonials. However, defendant STOLLERY knew at
5 the time that the purported client testimonials were false and
6 misleading in several ways, including that (a) for at least two of the
7 companies, the person never gave the testimonial that defendant
8 STOLLERY posted; (b) for at least two of the companies, the person
9 quoted as providing a testimonial never held the position listed in
10 the testimonial; (c) for at least four of the companies, the person
11 quoted as providing a testimonial no longer worked at the company when
12 defendant STOLLERY posted their testimonials; and (d) for at least four
13 of the companies, the company did not authorize the posting of the
14 testimonial. *Id.* ¶ 21(e).

15 For example, one of the illegitimate testimonials from a purported
16 "Director of Network Engineering" for eBay described the "quality job"
17 EHI was doing. *Id.* ¶ 21(f). However, the purported source of the
18 testimonial never held or used the title attributed to him and the
19 source denied providing that testimonial. *Id.* This was similarly the
20 case regarding testimonials from an "operations manager" at TrueCar.com
21 and from a "service delivery manager" with the Federal Reserve Bank.
22 *Id.* ¶¶ 21(g)-(h).

23 3. Social Media and Press

24 In addition to the TBIS Website and White Paper, defendant
25 STOLLERY made various fraudulent and misleading representations via
26 social media and the press. On his personal Instagram account
27 "michaelstollaire," defendant STOLLERY, on January 24, 2018, posted a
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1 photo of himself with the caption, "Doing the voiceover for an upcoming
2 TV spot about Titanium for LA cable TV and to air on American Airlines
3 monitors starting February 1, 2018!" *Id.* ¶ 21(i). Relatedly, on January
4 26, 2018, TBIS's YouTube account posted a video with the title,
5 "TITANIUM: Cable Television Advertisement and Airing on American
6 Airlines Monitors Internationally." Both statements were false, and
7 defendant STOLLERY knew they were false at the time he made them. *Id.*

8 During a January 11, 2018 interview on a YouTube channel, "P2P
9 Cryptoz" when asked how TBIS would compete with the "giants" in the
10 industry, defendant STOLLERY responded, "[i]t's the inroad that I
11 previously had with my first company, EHI. These relationships are
12 real. We're in talks with McDonald's, with Walt Disney, with Intel,
13 with Verizon right now. . . . We've got quite a client list." *Id.* ¶
14 21(j). Again, Defendant STOLLERY made this statement, even though he
15 knew then that it was false. *Id.*

16 **D. Receipt and Illicit Use of the Funds**

17 As a result of the fraudulent scheme, from on or about November
18 17, 2017, through at least January 25, 2018, defendant STOLLERY
19 obtained approximately \$21 million in the form of various digital
20 assets, such as Ether and Bitcoin, and cash from dozens of investors
21 located in at least 18 states, including California, and abroad, who
22 purchased BAR. *Id.* ¶ 22. Defendant STOLLERY did not use all of the
23 invested money as promised but instead comingled some of the ICO
24 investors' funds with his personal funds, using at least a portion of
25 the offering proceeds for expenses unrelated to TBIS, such as credit
26 card payments and the payment of bills for defendant STOLLERY's Hawaii
27 condominium. *Id.* ¶ 23.

E. Civil Suit

The Securities and Exchange Commission ("SEC") filed suit against defendant STOLLERY in the Central District of California charging the same scheme as the instant offense. PSR ¶ 87. The court entered Judgment on May 23, 2019, ordering defendant STOLLERY to pay disgorgement of ill-gotten gains, prejudgment interest, and a civil penalty, to be determined by the court upon motion of the SEC. *Id.*

III. CONCURRENCE IN THE FINDINGS OF THE PRESENTENCE REPORT

The government generally concurs in the findings of the Presentence Report prepared by the Probation Office in this case and disclosed on October 14, 2022. ECF No. 33. The government, however, abides by the plea agreement, and thus does not recommend a sophisticated means enhancement. The government also recommends a one-level variance that the government believes should apply because of the defendant's early acceptance of responsibility and turnover of cryptocurrency funds, including those unrelated to the TBIS scheme.

IV. GOVERNMENT'S POSITION RE SENTENCING

As explained in the following discussion, the government's recommendation that defendant STOLLERY be sentenced to 57 months in custody is based on an evaluation of the advisory sentencing guidelines and the other § 3553(a) factors.

A. Advisory Sentencing Guidelines

1. Stipulation of the Parties

Defendant STOLLERY and the government stipulated in the plea agreement that the following advisory sentencing guidelines apply:

Base Offense Level	7	U.S.S.G. § 2B1.1(a)
Specific Offense Characteristics	+20	20 U.S.S.G. §2B1.1(b) (1) (1)

Loss Greater than \$9.5 million but less than \$25 million		
More than 10 victims	+2	2 U.S.S.G. § 2B1.1(b) (2) (A) (i)

ECF No. 8 ¶ 12.

The parties reserved the right to argue that additional specific offense characteristics, adjustments, and departures under the sentencing guidelines are appropriate. *Id.*

2. Sophisticated Means

In addition to the guidelines to which the parties stipulated, the Probation Officer found that a two-level upward adjustment also applied, pursuant to U.S.S.G. § 2B1.1(b) (2) (10) (C), because the offense involved sophisticated means and defendant STOLLERY intentionally engaged in or caused the conduct constituting sophisticated means. PSR ¶¶ 55-56.

As noted above, the government abides by the plea agreement, and does not recommend that a sophisticated means upward adjustment be applied in this case.

B. Analysis of the § 3553(a) Factors

The factors to be considered when imposing a sentence, as set forth in 18 U.S.C. § 3553(a), include:

(1) The nature and circumstances of the offense and the history and characteristics of the defendant;

(2) The need for the sentence imposed -

(A) To reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;

1 (B) To afford adequate deterrence to criminal conduct;
2 [and]

3 (C) To protect the public from further crimes of the
4 defendant . . .

5 (3) The kinds of sentences available;

6 (4) [the applicable sentencing guidelines];

7 (5) [the applicable sentencing guidelines policy statement];

8 (6) The need to avoid unwarranted sentence disparities among
9 defendants who have been found guilty of similar conduct; and

10 (7) The need to provide restitution to the victims of the
11 offense.

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13
14 18 U.S.C. § 3553(a).

15 Factor 4 (the applicable sentencing guidelines) was discussed
16 above. The remaining § 3553(a) factors are discussed below.

17 1. Nature and Circumstances of the Offense

18 Defendant STOLLERY's offenses were serious and troubling: They
19 caused financial harm to victims spread across multiple countries and
20 at least eighteen states in the United States. As noted above, defendant
21 STOLLERY's criminal conduct resulted in total losses of approximately
22 \$21 million.

23 In order to carry out his fraud, defendant STOLLERY repeatedly
24 made fraudulent statements to the investing public across different
25 formats, including his personal social media accounts, the TBIS
26 website, the TBIS White Papers, the EHI website, and a YouTube channel,
27 all designed to fraudulently draw more investors into the scheme.

28 The fact that Defendant STOLLERY carried out his scheme over many

1 months, with careful planning and execution; caused financial harm;
2 and repeated his fraudulent statements over many media platforms, are
3 factors that weigh heavily in favor of a substantial prison sentence.

4 2. History and Characteristics of Defendant

5 Defendant STOLLERY did not commit his crime out of necessity.
6 There is no evidence that defendant STOLLERY's actions were the product
7 of financial distress. He attended college and obtained a Bachelor's
8 degree in psychology. PSR ¶ 83. Defendant STOLLERY owned and operated
9 EHI for the past 23 years. *Id.* ¶ 84. He works as an IT specialist. *Id.*

10 Nor was defendant STOLLERY's criminal conduct the result of a
11 monetary impulse. To the contrary, the criminal conduct -- including
12 the creation of the White Paper, creating false testimonials and
13 imaginary titles for EHI's "customers," promoting BAR, and doing a
14 YouTube interview -- took substantial time to implement.

15 Apart from his offense conduct, however, defendant STOLLERY's
16 personal characteristics are mitigating. His relationships with his
17 family may assist him in rebuilding his life as a law-abiding citizen
18 after he is released from custody.

19 3. Goals of Sentencing

20 Defendant STOLLERY has accepted responsibility for his offense
21 conduct. In fact, defendant STOLLERY accepted responsibility early,
22 allowing the government to conserve scarce investigative resources,
23 and has turned over his cryptocurrency funds. The government also is
24 not aware of any information that would suggest that defendant STOLLERY
25 has engaged in any similar conduct since his arrest in this case. The
26 government submits that these facts, and the reduced risk of recidivism
27 that they reflect, support a three-level reduction and a one-level
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1 variance in defendant STOLLERY's offense level.

2 Although the risk of recidivism is reduced, § 3553(a)(2) also
3 requires this Court to consider, when determining the sentence to be
4 imposed, the seriousness of the offense, the need to promote respect
5 for the law and provide just punishment for the offense, and the need
6 for general deterrence to criminal conduct.

7 These additional factors support the imposition of a significant
8 sentence in this case. As noted above, defendant STOLLERY's offense
9 was serious, resulting in financial harm to a large number of victims.
10 More significantly, the need for general deterrence is particularly
11 pronounced in this case to discourage persons from exploiting
12 cryptocurrency to perpetuate fraud.

13 As the FTC explained in its recent report cited in footnote 1,
14 above, cryptocurrency has several features that are attractive to
15 scammers, which may help to explain why the reported losses in 2021
16 were nearly sixty times what they were in 2018. Cryptocurrency transfer
17 cannot be reversed -- once the money is gone there is no getting it
18 back. And most people are still unfamiliar with how cryptocurrency
19 works. These considerations are not unique to cryptocurrency
20 transactions, but -- as the FTC notes -- they all play into the hands
21 of scammers. According to the FTC, since 2021, \$575 million of all
22 cryptocurrency fraud losses reported to the agency came from bogus
23 investment opportunities, far more than any other fraud type.

24 Deterrence depends on a strong message from the justice system
25 that exploiting the unique characteristics of cryptocurrency to cheat
26 members of the investing public will result in a significant prison
27 sentence. The government submits that a sentence at the low end of the

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1 advisory sentencing range corresponding to offense level 28 - i.e.,
2 the offense level that results after the requested 3-level variance is
3 applied - will appropriately balance the mitigating and aggravating
4 factors discussed above and send that important message.

5 **C. Government's Sentencing Recommendation**

6 Defendant STOLLERY's post-acceptance advisory guidelines offense
7 level is 25, resulting in a sentencing range of 57-71 months. The
8 government recommends that defendant STOLLERY be sentenced to 57
9 months, the low end of this range.

10 **V. RESTITUTION**

11 The government submits that restitution is not fully ascertainable
12 at this time because the government is awaiting additional information
13 from the Securities and Exchange Commission in connection with
14 Securities and Exchange Commission v. Titanium Blockchain
15 Infrastructure Services, Inc., Case No. 2:18-cv-04315-DSF-JPR.
16 Accordingly, pursuant to 18 U.S.C. § 3664(d)(5), the government
17 requests that the Court set a date for a final determination of
18 restitution not later than 90 days after the sentencing hearing. The
19 government also requests that the Court order that the Clerk's Office
20 (1) shall credit defendant STOLLERY against the amount of restitution
21 owed to any victim included in the Victim Restitution List any amount
22 the Receiver has paid that victim for the same loss by that victim in
23 Securities and Exchange Commission v. Titanium Blockchain
24 Infrastructure Services, Inc., Case No. 2:18-cv-04315-DSF-JPR, as
25 provided by 18 U.S.C. §3664(J)(2), and (2) shall accept the
26 representations from the Receiver that the losses paid to victims by
27 the Receiver are based on the same losses that those victims suffered

1 in the instant criminal case.

2 **VI. CONCLUSION**

3 For the foregoing reasons, the government respectfully requests
4 that this Court:

5 • Find that defendant STOLLERY's post-acceptance advisory
6 sentencing guidelines offense level is 25;

7 • Sentence defendant STOLLERY to 57 months in custody, the low
8 end of the applicable post-acceptance, post-recommended-variance
9 guidelines range, to be followed by three years of supervised release;
10

11 • Set a date for a final determination of restitution not later
12 than 90 days after sentencing hearing; and

13 • Order that the Clerk's Office (1) shall credit defendant
14 STOLLERY against the amount of restitution owed to any victim included
15 in the Victim Restitution List any amount the Receiver has paid that
16 victim for the same loss by that victim in Securities and Exchange
17 Commission v. Titanium Blockchain Infrastructure Services, Inc., Case
18 No. 2:18-cv-04315-DSF-JPR, as provided by 18 U.S.C. §3664(J)(2), and
19 (2) shall accept the representations from the Receiver that the losses
20 paid to victims by the Receiver are based on the same losses that those
21 victims suffered in the instant criminal case.
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1 Dated: November 4, 2022

Respectfully submitted,

2 GLENN S. LEON
3 Chief, Fraud Section
4 Criminal Division
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