

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America  
v.

Keyaira Bostic,

Defendant(s)

Case No.

20-6317-Hunt

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 May 18-July 20, 2020 in the county of Broward in the Southern District of Florida, the defendant(s) violated:

*Code Section*  
18 U.S.C. §§ 1343 and 2  
18 U.S.C. §§ 1344 and 2  
18 U.S.C. § 1349

*Offense Description*  
Wire Fraud  
Bank Fraud  
Conspiracy/Attempt to Commit Wire and Bank Fraud

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

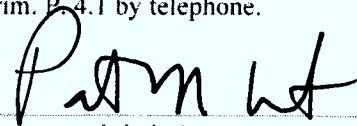


Complainant's signature

Michael Benivegna, Special Agent, IRS-CI  
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 8/3/2020



Judge's signature

City and state: Ft. Lauderdale, Florida

Hon. Patrick M. Hunt, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT**

I, Michael Benivegna, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this Affidavit in support of a criminal complaint charging KEYAIRA BOSTIC (“BOSTIC” or “Defendant”), with wire fraud, bank fraud, attempt and conspiracy to commit wire fraud and bank fraud, in violation of 18 U.S.C. §§ 1343, 1344, 1349, and 2, from on or about May 18, 2020 to on or about July 20, 2020, in the Southern District of Florida, and elsewhere (the “Target Offenses”).

2. Defendant has participated in a scheme to obtain by fraud millions of dollars in forgivable loans through the Paycheck Protection Program (“PPP”) and other government programs, conspiring with a person now cooperating with the investigation (“CHS 2”) and others. Defendant obtained a fraudulent PPP loan for her own company, I Am Liquid Inc. (“Liquid”), with CHS 2 providing falsified documents and submitting the application on Defendant’s behalf. Defendant also conspired to submit a number of additional fraudulent PPP loan applications for other companies by recruiting other confederate loan applicants, in order to receive kickbacks from those confederates. To inflate the size of these PPP loans, and the corresponding kickbacks, the conspirators relied on a variety of false statements, including by submitting falsified bank statements and payroll tax forms. For example, the conspirators used nearly identical versions of the same fabricated bank statements, recycled in the PPP applications for multiple companies with minor changes.

3. The conspirators in the scheme planned or prepared at least 90 fraudulent applications, most of which were submitted. Based on the evidence investigators have reviewed to date, CHS 2, Defendant, and their co-conspirators applied for PPP loans that are together worth

more than \$24 million dollars, with at least approximately 42 of those loans approved and funded for a total of approximately \$17.4 million. Certain of those loan recipients then wired a kickback of varying amounts, often approximately 25% of the fraudulent loan proceeds, to an account controlled by CHS 2.

4. I am a Special Agent with the United States Department of The Treasury, Internal Revenue Service, Criminal Investigation (“IRS-CI”) and have been employed in this capacity since October 2016. I am presently assigned to the Miami Field Office. My duties as a Special Agent include the investigation of possible criminal violations of the Internal Revenue Code (Title 26 of the United States Code), the Bank Secrecy Act (Title 31 of the United States Code), and the Money Laundering Statutes (Title 18 of the United States Code). I graduated from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in April 2017 and the Special Agent Investigative Techniques program at the National Criminal Investigation Training Academy in July 2017. In these two programs, I studied a variety of law enforcement tactics and criminal investigator techniques relating to tax and financial crimes. Since becoming an IRS-CI Special Agent, I have personally investigated and assisted in investigations relating to the Internal Revenue Laws and financial crimes. Recently, I have been assigned to work with the U.S. Department of Justice and other law enforcement partners, including the Federal Bureau of Investigation and the Small Business Administration Office of Inspector General, to investigate possible fraud associated with the stimulus and economic assistance programs created by the federal government in response to the COVID-19 program.

5. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other members of law enforcement and from witnesses.

This Affidavit is intended to show merely that there is sufficient probable cause and does not set forth all of my knowledge about this matter.<sup>1</sup>

### **PROBABLE CAUSE**

#### **The Paycheck Protection Program**

6. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act is a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to the millions of Americans who are suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the PPP. In or around April 2020, Congress authorized over \$300 billion in additional PPP funding.

7. In order to obtain a PPP loan, a qualifying business must submit a PPP loan application, which is signed by an authorized representative of the business. The PPP loan application requires the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application, the small business (through its authorized representative) must state, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures are used to calculate the amount of money the small business is eligible to receive under the PPP. In addition, businesses applying for a PPP loan must provide documentation showing their payroll expenses.

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<sup>1</sup> The conduct and charges described in this Affidavit are part of a larger investigation that is being conducted in this District and elsewhere. As a result, not all numbered sources and anonymous individuals and entities are described in every filing. I have included in this Affidavit only those individuals and entities I have deemed necessary to explain the particular facts set forth here.

8. A PPP loan application must be processed by a participating lender. If a PPP loan application is approved, the participating lender funds the PPP loan using its own monies, which are 100% guaranteed by the Small Business Administration (“SBA”). Data from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, is transmitted by the lender to the SBA in the course of processing the loan.

9. PPP loan proceeds must be used by the business on certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal on the PPP loan to be entirely forgiven if the business spends the loan proceeds on these expense items within a designated period of time after receiving the proceeds and uses a certain amount of the PPP loan proceeds on payroll expenses.

**The Scheme to Obtain Fraudulent PPP Loans**

10. On or about May 13, 2020, Phillip J. Augustin (“Augustin”) and CHS 2 worked together to submit a fraudulent PPP loan application on behalf of a company owned by Augustin. Augustin submitted a PPP loan of \$84,515 to a federally insured bank (hereinafter “Bank 3”), through a third-party company processor (hereinafter “Bank Processor 1”).<sup>2</sup> The application included bank statements that are clear forgeries, and CHS 2 has admitted that the application was based on documents that he falsified for Augustin.<sup>3</sup>

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<sup>2</sup> All banks referenced in this Affidavit are insured by the Federal Deposit Insurance Corporation.

<sup>3</sup> On June 25, 2020, investigators arrested CHS 2 and another person now cooperating with the investigation (“CHS 3”) and executed search warrants at their residences. Following his arrest, CHS 2 chose to cooperate with the investigation in the hope of obtaining favorable consideration in connection with his pending charges. CHS 2 was interviewed on that day, and has continued to cooperate with the investigation after obtaining counsel. Most of his statements related herein have been corroborated by records obtained from third parties or recovered from his electronic devices.

11. Following the success of that initial fraudulent PPP application, Augustin and CHS 2 began to work on obtaining more and larger PPP loans for Augustin's associates and others, generally for several hundred thousand dollars for each loan, up to as much as approximately \$1.24 million. Based on the evidence investigators have reviewed so far, CHS 2 and Augustin collectively coordinated applications for PPP loans that are together worth more than \$24 million dollars. The evidence also shows many more PPP loans were attempted but rejected by banks or their partners, or were planned and prepared, but not submitted before CHS 2's arrest. The evidence suggests that all or nearly all of those loan applications were fraudulent, including Defendant's loan application and the applications Defendant orchestrated by referring additional confederates to the conspiracy.

12. Investigators have obtained many other PPP loan applications that CHS 2 has admitted he submitted as part of this scheme, based on falsified documents, and have also obtained draft documents used or intended to be used in those applications or others. These applications all follow the same pattern of fraud—many with obviously counterfeit February 2020 bank statements, and all with fabricated IRS Forms 941 (titled, "Employer's Quarterly Federal Tax Return") with the same indicia of fraud found in Augustin's initial application—but generally with even larger inflated payroll numbers, thus yielding much larger loans.<sup>4</sup> CHS 2 has explained to investigators that the figures in the Forms 941 were the product of a formula that allowed him to start with a target loan amount, and then "back into" the payroll figures on the form. He explained how he used figures that would produce an average monthly payroll for 2019 that, when multiplied by 2.5, would yield the requested loan amount. In turn, the number of employees reported was

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<sup>4</sup> Some loan applications also included voided checks that appear to be falsified, such as a purported Bank 5 check that appears to have been produced on a computer and, as the subject line reads, "Converted to PDF," rather than a scan of an authentic check.

chosen based on fictional payroll figures, chosen to avoid an average employee salary that might raise suspicion.

13. CHS 2 has also explained that he tried to use bank statements showing that the company had a large balance. Because so few companies had such a statement, and likely also because it was easier than keeping track of their true statements, CHS 2 repeatedly submitted near-replicas of the same falsified bank statements. In particular, CHS 2 appears to have recycled one statement each from Bank 1, Bank 6, and Bank 7. In recycling a statement, CHS 2 generally changed only the account number and the account holder's name and address, such that each version of the statement had identical figures and line items throughout the statement.

14. A review of records for bank accounts controlled by CHS 2 at Bank 5 confirm CHS 2's admissions that he received numerous kickbacks, often of approximately 25% of the amount of the loans, and that he regularly wired Augustin a share of that kickback in the early stages of the scheme. CHS 2 explained that they were doing so many loans by the end of May that he changed course, instead wiring larger lump sums, collecting Augustin's shares of the kickbacks for multiple loans in one wire.

15. Investigators are still receiving and analyzing records, but based on a preliminary analysis, as of July 24, 2020, investigators had identified a total of \$2,367,765.82 in transfers to CHS 2's accounts from entities that each obtained a sizable PPP loan and that were identified in the PPP files seized from CHS 2's and another co-conspirator's residences, as described below—or from individuals associated with those entities.

16. The PPP loans identified above as implicated in the foregoing kickback payments to CHS 2 represent only a fraction of the overall scheme. In executing search warrants at the respective residences of CHS 2 and CHS 3, federal agents found stacks of paper printed out and

organized by entity, containing an “intake form,” fabricated Forms 941, or both for each entity. The intake forms contained fields for the information needed to fabricate the documents and fill out other aspects of the PPP application: identifying information about the owner and company, as well as bank account information for receiving the loan. A section at the end marked “BELOW IS OFFICE USE ONLY” included blank fields for the “Number of Employees,” “Monthly Payroll Expense,” and “SBA Loan Pre-Approval Amount.” Between CHS 2’s and CHS 3’s residences, investigators seized paper files for PPP loan applications for approximately 80 different entities.

17. Data obtained from the SBA showed additional PPP loan applications from additional entities that text message and email records show had been referred to CHS 2 by Defendant or other individuals.

**The Fraudulent PPP Loan to Defendant’s Company: Liquid**

18. According to Florida’s Division of Corporations website (“Sunbiz”), Liquid was incorporated in 2015 by BOSTIC, who is listed as the company’s president and registered agent. The address listed on Sunbiz for Liquid is a residential address in Pembroke Pines where BOSTIC appears to reside.<sup>5</sup>

19. According to bank records, BOSTIC opened a business checking account in the name of Liquid in December 2019. I have reviewed the statements from that account, which reveal little in the way of business activity and nothing indicating recurring payroll payments.<sup>6</sup>

20. On or about May 19, 2020, a PPP loan application package on behalf of Liquid was electronically submitted to Bank 3 through Bank Processor 1. The loan application package

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<sup>5</sup> As further described herein, on July 17, 2020, investigators met with and interviewed BOSTIC at this location.

<sup>6</sup> On June 5 and 8, 2020, there are card purchases (for the first time), for Quickbooks Online and Intuit Payroll, respectively. However, this is weeks after BOSTIC applied for and received the PPP loan proceeds.



included, among other documents: (1) purported Forms 941 for all four quarters of 2019; (2) a company bank statement for Liquid; (3) an application form; and (4) a promissory note.

21. The purported Forms 941 included in the application show quarterly payroll of more than \$100,000 each quarter, for 10 employees. That quarterly payroll figure yielded the PPP loan application's "Average Monthly Payroll" figure of \$33,806, which determined the \$84,515 amount of the loan. Each was signed by hand with the name "Keyaira Bostic" as the company owner, and also listed BOSTIC as the company's designee and as a "Paid Preparer," though she is not a paid tax preparer. The Liquid Forms 941 follow the same style and pattern as the many other Forms 941 that CHS 2 falsified in the course of the scheme, including in the indicia of fraud.<sup>7</sup> IRS records show that Liquid did not, in fact, file any Forms 941 for any quarter of 2019 or the first quarter of 2020, and Florida Department of Revenue records show that Liquid did not report any wages or employees for that same period.

22. The purported company bank statement, which was submitted in electronic, PDF format, is a clear forgery. First, the statement is not from Liquid's bank. Second, nearly every page of the statement lists the wrong company name ("I AM Liquid LLC"). Third, according to

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<sup>7</sup> As noted above, BOSTIC was listed as both owner and paid preparer. Dozens of other Forms 941 submitted in this scheme evidence the same error. CHS 2 has admitted that these documents share that feature because he misunderstood the form, and he (or someone following his instructions) prepared all of the Forms 941 at issue. The content of the forms also indicate falsification. All four quarterly forms are nearly identical, and the four forms for Liquid are identical, down to the penny, in reported figures. They also evidence a pattern of payroll spending that is likely false: each of the quarters shows significant increases from the first to second to third month of the quarter. For each identical form, the same figures are reported for the tax liability incurred in the first month of each quarter, the same figure for the second month of each quarter (increased substantially from the first month), and the same figure for the third month of each quarter (increased substantially from the second month). The result is that the company reports a perfectly repeating cycle of ascending payroll costs within each quarter, dropping down again at the start of the next quarter. CHS 2 has explained that this was due to a formula he used, allocating different percentages of the quarterly payroll tax liability to each month of each quarter.

the document's file "properties," the statement was created using "PDFFILLER," a program used to edit electronic PDF files, and was "modified using iText." Fourth, the statement is a recycled version of the same falsified Bank 7 statement used in other fraudulent applications submitted as part of this scheme.

23. The application form, labeled at the top "Payment Protection Program Borrower Application Form," listed BOSTIC as the owner of Liquid, claimed the company had 10 employees, and stated that the average monthly payroll was \$33,806. Based on this figure, the amount of the PPP loan request was \$84,515. The application form required the borrower to electronically initial a number of "certifications," including: (1) that the applicant was in operation on February 15, 2020 and had employees to whom it paid salaries/payroll taxes or paid independent contractors, as reported on IRS Forms 1099; (2) that the funds would be used to retain workers, maintain payroll, or make mortgage/interest/lease/utility payments as specified by the PPP rule and that unauthorized use could result in charges for fraud; and (3) that the information provided in the application, including in supporting documents, was "true and accurate in all material respects," and that making false statements could result in criminal charges. The application was electronically signed with the name "Keyaira Bostic," and each certification was electronically initialed "K.B."

24. The promissory note, labeled at the top "Paycheck Protection Program Loan," set forth the amount of the loan (\$84,515) and its terms (including that the proceeds could only be used for business purposes). The terms also specified that the borrower may apply for loan forgiveness only in an amount equal to the sum of certain specified costs: payroll costs, interest on mortgage obligations, rent obligations, and utility payments. The promissory note further specified that not more than 25% of the amount of forgiveness can be attributable to non-payroll costs.

Additionally, the promissory note contained a “Representations and Warranties” section for the borrower to acknowledge, among other things that “the information provided in all supporting documents and forms to obtain this loan” were true and accurate. The promissory note was electronically signed with the name “Keyaira Bostic.”

25. Based on the representations made in the loan application paperwork and supporting documents, the PPP loan application for Liquid was approved, and on May 20, 2020, Bank 3 wired \$84,515 in loan proceeds into the Liquid bank account.

**CHS 2 Confirmed to Law Enforcement that the Liquid PPP Loan Was Fraudulent and that BOSTIC Referred Others to the Scheme**

26. Investigators spoke with CHS 2 about the Liquid PPP loan. CHS 2 confirmed that the loan application was fraudulent. CHS 2 stated that he: (1) created for BOSTIC an online account for Liquid with Bank Processor 1; (2) created and submitted the fake Liquid bank statement; and (3) created, submitted, and signed (on behalf of BOSTIC), the false Forms 941. According to CHS 2, however, he did not sign the application form or promissory note.

27. IP session records from Bank Processor 1 and a consensual search of BOSTIC’s phone corroborate CHS 2’s account regarding which actions he did and did not take with respect to BOSTIC’s loan. Bank Processor 1’s IP records for the submission of the Liquid loan application show that a computer with an IP address (ending in 170) associated with CHS 2’s residence in Broward County, Florida, logged into the Liquid loan account on May 18, 2020. All other logins for the account, however, including those on May 19, 2020 (the date the application form and promissory note were signed and submitted) came from a different IP address (ending in 120). One such login occurred on a date that CHS 2 is known to have been incarcerated. Every login from the IP address ending in 120 also coincided with dates and times when BOSTIC’s web search history, as recovered through a consensual search of her iPhone, shows that she was on Bank

Processor 1's website. For instance, the IP log from Bank Processor 1 shows the IP address ending in 120 accessed the website on May 19, 2020, at 6:04 PM UTC, while BOSTIC's web search history shows that she accessed Bank Processor 1's website on May 19, 2020, at 6:04 PM UTC. The same is true for login activity regarding the IP address ending in 120 on May 24, June 29, and July 20, 2020.

28. CHS 2 also stated that, in addition to the Liquid loan, BOSTIC referred to him a number of friends/associates for the purpose of creating and submitting additional fraudulent PPP loans. CHS 2 stated that he and BOSTIC reached an agreement whereby he would give her a portion of the 25% kickback payments for each of BOSTIC's successful referrals. As further described below, CHS 2 confirmed that he made two payments to BOSTIC for \$20,000 each, on June 10 and June 15, as her share of the kickbacks received from one of BOSTIC's successful referrals.

**Emails and Text Messages Confirm BOSTIC's Knowing Participation in the Fraud**

29. As part of its investigation, law enforcement obtained communications between CHS 2 and BOSTIC, including text messages and emails. I have reviewed a number of these communications, which discuss, among other things, BOSTIC's PPP loan and the loans for the individuals she referred to CHS 2.

30. For example, on May 19, 2020, the date of her own PPP loan submission, BOSTIC stated in a text message to CHS 2: "I signed everything."

31. On May 20, 2020, BOSTIC texted CHS 2: "Do you accept referrals?" That same day, CHS 2 emailed BOSTIC a blank intake information form to be filled out with the personal and business information for BOSTIC's referrals. On May 22, 2020, BOSTIC texted CHS 2: "I sent the emails for 2 clients, please give me a call when you get a chance."

32. As an example of one of her referrals, on May 23, 2020, BOSTIC emailed CHS 2 a completed intake information form for Person 20 and Company 22. The information on the intake form included, among other things: (1) Person 20's name, address, date of birth, social security number, and email address; (2) the name of Company 22 its business address, Tax ID, and business start date; and (3) a bank account and routing number.

33. That same day, BOSTIC texted another person (who she had also referred to CHS 2 and who had applied that day for a PPP loan) an internet link to an article and television news report regarding fraud charges against an Atlanta-based reality television star for fraudulently obtaining a PPP loan. BOSTIC then stated: "This is buddy what he did and the amount was a huge red flag."

34. Less than ten minutes later, BOSTIC texted CHS 2 and stated: "Keep him under 300 please." Based on the context of the conversation, it appears to me that BOSTIC was talking about Person 20 and the loan amount for his entity, Company 22.

35. As another example of BOSTIC referring others to the scheme, on May 29, 2020, BOSTIC sent emails to CHS 2 with the same kind of personal and business information regarding another referral, Person 21 and Company 23. BOSTIC also sent CHS 2 copies of Person 21's driver license and a voided check from his bank account. That same day, regarding this same referral, BOSTIC texted CHS 2: "[Person 21] not over 325k please."

36. On May 31, 2020, CHS 2 and BOSTIC had a similar text exchange but about a different referral. CHS 2 asked: "Kay what do you want me to put [Person 22] in for 300-400?" BOSTIC responded: "Yes that good." CHS 2 stated: "375." BOSTIC responded: "Yes."

37. During my review of BOSTIC's communications with CHS 2, I found what appears to be information pertaining to at least eight different individuals/companies that she referred to

the scheme. Further information, including review of data collected by the SBA and bank records, to date has identified PPP loans totaling more than \$2.5 million corresponding to these names and entities.

38. I also found text message communications discussing the 25% kickback payment that the people BOSTIC referred would have to make. For example, on May 29, 2020, BOSTIC texted CHS 2: “[Person 23] got his.” CHS 2 then texted wiring instructions for his bank account. BOSTIC asked CHS 2 to “send amount as well.” CHS 2 responded: “He Recieved [sic] 408,232 He needs to send us 102,158.” BOSTIC stated, “Ok.”

**Bank Records Confirm BOSTIC's Knowing Participation in the Fraud**

39. I have also reviewed Liquid's and CHS 2's bank records, which confirm BOSTIC's receipt of the PPP loan proceeds as well as her 25% payment to CHS 2. Specifically, on May 20, 2020, Bank 3 wired \$84,515 (the amount of the loan) into the Liquid account. The next day, BOSTIC wired \$21,130 (approximately 25% of the loan amount) into one of CHS 2's accounts.

40. The bank records also reflect payments to CHS 2 from BOSTIC's referrals as well as payments by CHS 2 to BOSTIC.

41. On June 5 and 9, 2020, CHS 2 received wire transfers in the amount of \$47,000 and \$40,000, respectively, from a company to his bank account. On June 10, 2020, CHS 2 wired \$20,000 to BOSTIC from that same account. On June 15, 2020, CHS 2 then wired BOSTIC an additional \$20,000 from his account. CHS 2 has stated that those two incoming payments from the company represented the kickbacks owed to him from that company, and that the two outgoing payments to BOSTIC's Liquid account represented her share of those kickback payments.

42. Meanwhile, on June 4, 2020, CHS 2 received a \$73,000 wire transfer from Company 24, which BOSTIC had referred to the scheme. CHS 2 has stated that he did not pay a

portion of this kickback payment to BOSTIC. Instead, CHS 2 explained that he and BOSTIC had difficulty collecting the full amount of the kickback owed from another of BOSTIC's referrals, Person 23. He said that he therefore agreed with BOSTIC that he (CHS 2) would keep the full amount of the \$73,000 kickback payment from Company 24, and that BOSTIC could then keep whatever amount she was able to collect from Person 23.

43. On June 25, 2020, CHS 2 received a payment of \$28,800 from another company. That same day, at 11:45 AM, BOSTIC sent CHS 2 a text in which she wrote: "She sent 28,800 I'm meeting her on Saturday to pick up cash . [sic] can't meet her today because I'm working on a project in Orlando". CHS 2 has stated that payment of \$28,800 represented an initial kickback payment for the fraudulent loan for that company, and that he would have paid a share of that amount to BOSTIC but for the fact that he was arrested on the day he received that payment.

**BOSTIC's Statement to Law Enforcement**

44. On July 17, 2020, investigators interviewed BOSTIC regarding the Liquid PPP loan. BOSTIC admitted to receiving the loan proceeds and to paying 25% of those proceeds to CHS 2. But BOSTIC stated that she was unaware that her loan application claimed 10 employees until after it was submitted and the funds were disbursed.<sup>8</sup> BOSTIC further stated that CHS 2 prepared all of the loan documents and that the only document she signed was the promissory note. According to BOSTIC, CHS 2 had told her to just scroll to the bottom and sign. BOSTIC claimed she did not know her loan was a PPP loan until her friends told her later.

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<sup>8</sup> BOSTIC stated that she had only four employees, though even this claim is not supported by bank or state records.

45. When asked about referrals during the same interview, Bostic claimed that she referred only one person to CHS 2. BOSTIC said nothing about the other referrals mentioned in her communications with CHS 2 or the \$40,000 in kickbacks she received.

**CONCLUSION**

46. Based on the forgoing, I respectfully submit that there is probable cause to believe that KEYAIRA BOSTIC committed the Target Offenses.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



MICHAEL BENIVEGNA  
Special Agent  
IRS-CI

Attested to by the applicant in accordance  
with the requirements of Fed. R. Crim. P. 4.1  
by telephone on this 34 Day of August, 2020



HON. PATRICK M. HUNT  
UNITED STATES MAGISTRATE JUDGE



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 20-6317-Hunt

IN RE: SEALED COMPLAINT  
\_\_\_\_\_ /

**CRIMINAL COVER SHEET**


1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)?    \_\_\_ Yes    X No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)?    \_\_\_ Yes    X No
3. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)?    \_\_\_ Yes    X No

Respectfully Submitted,

ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

ROBERT ZINK  
CHIEF, FRAUD SECTION

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