

STATE OF NEW YORK : COUNTY OF ERIE  
LANCASTER VILLAGE COURT

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PEOPLE OF THE STATE OF NEW YORK

-against-

FELONY COMPLAINT

G. STEVEN PIGEON,  
KRISTY MAZUREK,  
DAVID PFAFF,

File No.: 00771-2017 (AG)

**Defendants.**

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INVESTIGATOR BRIAN ROSS of the New York State Office of the Attorney General (hereinafter "OAG" or "Deponent"), Shield Number 2420, being duly sworn, deposes and states that the defendants, G. STEVEN PIGEON, KRISTY MAZUREK and DAVID PFAFF committed the following crimes:

**COUNT ONE:** On or about August 6, 2013 through on or about September 9, 2013, in the Village of Lancaster, and elsewhere in the County of Erie, State of New York, the defendants, G. STEVEN PIGEON, KRISTY MAZUREK and DAVID PFAFF, committed the crime of **Election Law section 14-126 (5), a class E felony**, in that they, while acting on behalf of a political committee, to wit, Western New York Progressive Caucus, knowingly and willfully solicited, organized or coordinated the formation of activities of one or more unauthorized committees, and made expenditures in connection with the nomination for election or election of any candidate, to wit, Candidate 1, or solicited any person to make any such expenditures, for the purpose of evading the contribution limitations of Article 14 of the New York State Election Law;

**COUNT TWO:** On or about August 5, 2013 through on or about September 10, 2013, in the Village of Lancaster and elsewhere in the County of Erie, State of New York, the defendants, G. STEVEN PIGEON, KRISTY MAZUREK and DAVID PFAFF, committed the

crime of **Election Law section 14-126(5), a class E felony**, in that they, while acting on behalf of a political committee, to wit, Western New York Progressive Caucus, knowingly and willfully solicited, organized or coordinated the formation of activities of one or more unauthorized committees, and made expenditures in connection with the nomination for election or election of any candidate, to wit, Candidate 2, or solicited any person to make any such expenditures, for the purpose of evading the contribution limitations of Article 14 of the New York State Election Law;

**COUNT THREE:** On or about August 7, 2013 through on or about September 10, 2013, in the Village of Lancaster and elsewhere in the County of Erie, State of New York, the defendants, G. STEVEN PIGEON, KRISTY MAZUREK and DAVID PFAFF, committed the crime of **Election Law section 14-126(5), a class E felony**, in that they, while acting on behalf of a political committee, to wit, Western New York Progressive Caucus, knowingly and willfully solicited, organized or coordinated the formation of activities of one or more unauthorized committees, and made expenditures in connection with the nomination for election or election of any candidate, to wit, Candidate 3, or solicited any person to make any such expenditures, for the purpose of evading the contribution limitations of Article 14 of the New York State Election Law;

**COUNT FOUR:** On or about September 13, 2013, in the Village of Lancaster and elsewhere in the County of Erie, State of New York, the defendants, G. STEVEN PIGEON, KRISTY MAZUREK and DAVID PFAFF, committed the crime of **Offering a False Instrument for Filing in the First Degree, in violation of Penal Law section 175.35, a class E felony**, in that they, knowing that a written instrument contained a false statement or false information, and with intent to defraud the State of New York or any political subdivision, public authority or public benefit corporation of the state, offered or presented it to a public office,

public servant, public authority or public benefit corporation with the knowledge or belief that it would be filed with, registered or recorded in, and otherwise become part of the records of such public office, public servant, public authority or public benefit corporation, to wit, Western New York Progressive Caucus Political Committee's New York State Board of Elections Campaign Finance Disclosure Report for the 2013 11-Day Pre-Primary reporting period filed with the New York State Board of Elections.

### **FACTUAL BASIS**

1. I am an Investigator located in the OAG Buffalo Regional Office. I base this Felony Complaint upon my own personal knowledge, training, experience, and the information provided to me by third parties. The third parties include numerous witnesses and the information consists of email and text communications, records of the New York State Board of Elections, and bank records. I identify the sources of all information provided by third parties and believe that the information provided by them is true and accurate.

### **OVERVIEW**

2. G. Steven Pigeon ("Pigeon") is an attorney, political operative, owner of Landen Associates, LLC ("Landen"), and co-owner of PAPI Holdings ("PAPI"), both consulting businesses. He is the former Erie County Democratic Chairman. Kristy Lynn Mazurek ("Mazurek") is a former news reporter who recently ran an unsuccessful campaign for a New York State Assembly seat, and a close acquaintance of Pigeon's. David Pfaff ("Pfaff") is a self-employed political consultant, formerly employed with various Democratic legislators. As will be alleged in more detail below, defendants Pigeon and Mazurek formed a political committee in August 2013, named Western New York Progressive Caucus ("WNYPC"), located at 14 Doris Avenue, Village of Lancaster, County of Erie, State of New York, and registered it with the New York State Board of Elections ("SBOE"). Mazurek has been the treasurer of WNYPC since its

inception. According to SBOE records, WNYPC is still an active committee. Pigeon, Mazurek and Pfaff each played key roles in the creation, operation and funding of WNYPC. Specifically, Mazurek was WNYPC's treasurer; Pfaff filed WNYPC's required reports with the State Board of Elections ("SBOE"); and Pigeon was WNYPC's fundraiser and its primary decision maker. WNYPC's purported purpose was to support candidates who ran in the 2013 primary races held on September 10, 2013. Pigeon, Mazurek and Pfaff committed crimes arising from their involvement with WNYPC.

**REGISTRATION AND CAMPAIGN FINANCE DISCLOSURE REPORT**  
**FILING REQUIREMENTS WITH THE SBOE**

3. I am familiar with the New York State Election Law ("EL"), including political committees' obligations for completing and then filing Campaign Finance Disclosure Reports ("CFDR") with the SBOE. Three types of political committees are relevant for the purposes of this Felony Complaint: an authorized committee; an unauthorized committee, also known as an independent expenditure committee ("IEC"); and a political action committee ("PAC"). An authorized committee can be used when any committee, political club or combination of one or more persons operates or cooperates to aid or take part in the election or defeat of a candidate for public office. An IEC is not specifically authorized by one candidate or a group of candidates to raise or spend money on their behalf for their election. Accordingly, an IEC can support multiple candidates at the same time.

4. Though not defined by New York Law in 2013, a PAC was then considered by SBOE to be a political committee that supports candidates or other political committees solely by making contributions. A PAC cannot make direct expenditures on behalf of a candidate. The maximum amount that a PAC can give directly to a candidate or committee is subject to the campaign contribution limits set by the SBOE for a particular election. An IEC's spending on

behalf of a candidate is subject to the same contribution limits as a PAC. *See*, SBOE Campaign Finance Handbook 2013, page 1. Each primary, general, or special election campaign has its own contribution limit. Accordingly, no contributor may give more to a candidate or a candidate's authorized political committee than an amount determined under the law for the office sought by the candidate. EL 14-114 (1) (a) (b).

5. According to the Election Law, an IEC must be independent of the candidate or the candidate's agents. An IEC can make an expenditure that: (i) expressly advocates for the election or defeat of a candidate; and (ii) is independent of the candidate or his agents or authorized political committees. Specifically, the candidate or the candidate's agents or authorized political committees cannot authorize, request, suggest, foster or cooperate in any way with the IEC. EL 14-100. Illegal coordination between an IEC and a candidate or the candidate's committee occurs when there is communication between them about IEC expenditures made on behalf of the candidate that exceed the campaign expenditure limit for that candidate's race. In 2013, EL section 14-126(5) was the statute that made coordination illegal.<sup>1</sup> The statute stated as follows:

Any person who shall, acting on behalf of a candidate or political committee, knowingly and willfully solicit, organize or coordinate the formation of activities of one or more unauthorized committees, make expenditures in connection with the nomination for election or election of any candidate, or solicit any person to make any such expenditures, for the purpose of evading the contributions limitations of this article, shall be guilty of a class E felony.

6. The EL directs when a political committee is obligated to register and file Campaign Finance Disclosure Reports ("CFDR") with the SBOE for different reporting periods established annually by the SBOE. All financial activities which occurred during each reporting period must be recorded on specific schedules on the CFDR, such as Schedule A for individuals

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<sup>1</sup> It was subsequently amended to EL section 14-126(6).

or partnerships contributions, Schedule B for contributions from corporations and Schedule C for other monetary contributions. Expenses paid by the political committee are reported on Schedule F. The cut-off dates for each reporting period and the deadlines for filing are established annually by the SBOE.<sup>2</sup> EL section 14-102; EL section 14-110; NYCRR 6200.1. All CFDRs filed with SBOE must be truthful and specific. EL 14-118, 14-102(1).

7. I am aware that any contribution to a candidate or political committee must be made under the true name of the contributor. EL 14-120 (1) prohibits a contributor from making a donation in anyone else's name but his own. It also prohibits a candidate, the candidate's committee, or any other person from knowingly receiving a payment or a promise of a payment, or entering, or causing the contribution to be entered, into the accounts of a committee in a name other than that of the person or persons by whom it was made.

8. EL section 14-102 (1) provides:

The treasurer of every political committee which, or any officer, member or agent of such committee who, in connection with any election, receives or expends any money or other valuable thing or incurs any liability to pay money or its equivalent shall file statements sworn, or subscribed and bearing a form notice that false statements made therein are punishable as a class A misdemeanor pursuant to section 210.45 of the penal law, at the times prescribed by this article setting forth all the receipts, contributions to and the expenditures by and liabilities of the committee, and of its officers, members and agents on its behalf.

The statements referred to in this statute are the CFDRs. Whenever a committee receives a contribution that exceeds \$99, the contribution has to be itemized in detail on the appropriate schedule of the CFDR. The itemized detail must include the name and address of the contributor, the amount of the contribution, and the check number, if the contribution was made by check. EL section 14-118; and EL section 14-102(1).

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<sup>2</sup> One of the CFDRs that the SBOE requires is a so-called 11-Day Pre-Primary. This report, referred to below, is the final report filed by a campaign committee prior to the primary election.

## **WNYPC'S CREATION AND REGISTRATION WITH THE NEW YORK SBOE**

9. On January 29, 2015, members of the State Police and the FBI interviewed Mazurek, who stated that in 2013, she and defendant Pigeon decided to start WNYPC. Pigeon told her that he would not be the treasurer, so she volunteered for the job. Defendant Pfaff also became involved in WNYPC. Mazurek said that Pfaff was a political strategist who was served as the “administrative guy” for WNYPC.

10. On August 22, 2013, the SBOE received a Committee Registration Form CF-02 (“Form CF-02”), signed by Mazurek and dated August 1, 2013. She was the designated Treasurer of the WNYPC and M&T Bank was the selected depository for WNYPC. Both the opening account records, which I have reviewed, and the CF-02, list the address of WNYPC as 14 Doris Avenue, Village of Lancaster, County of Erie, State of New York. According to the Form CF-02, Mazurek sought to register WNYPC as a PAC. In a letter dated August 26, 2013 to Mazurek, the SBOE acknowledged receipt of her registration form and assigned her Filer Identification Number A 19577. On September 11, 2013, one day after the September 10, 2013 primary, Mazurek amended that designation to register WNYPC as an IEC. SBOE records show that despite repeated requests, Mazurek failed to file an additional form that the SBOE requested regarding WNYPC’s re-designation from a PAC to an IEC. Therefore, the re-designation of WNYPC from a PAC to an IEC did not officially occur until February 20, 2014. Based upon WNYPC’s filings and interviews with Mazurek and Pfaff, it was apparent that WNYPC was intended to be an IEC from its inception.

11. On February 10, 2015, members of the State Police and the FBI interviewed defendant Pfaff. Pfaff stated that he was the individual responsible for entering data and filing WNYPC’s CFDRs with the SBOE, because he had the software necessary to complete the CFDRs and file them with the SBOE on his computer. He said that he was familiar with the

Election Law, had run campaigns for many years, and could run a campaign “in his sleep.” Pfaff confirmed that WNYPC worked on political campaigns in 2013 that supported Candidates 1 and 2, and others.

12. Pfaff stated that WNYPC “belonged” to Pigeon and Mazurek, who were responsible for making the final decision on WNYPC’s expenditures. He said that Pigeon was the one who was able to raise the money. Pfaff stated that he was responsible for filing WNYPC’s finance reports to the SBOE. During the 2013 campaign season, Pfaff worked on specific campaigns at Pigeon’s direction, creating campaign literature and targeted mailings. He was compensated approximately \$6,000 by Pigeon through Pigeon’s consulting business, Landen Associates, LLC (“Landen”), for working on the campaigns and working for WNYPC.

13. I have reviewed the bank records of WNYPC, as well as those of Landen and Pigeon. In addition, I have reviewed the written statements of every person who directly or indirectly donated to WNYPC. Virtually all of the approximately \$250,000 in contributions received by WNYPC were obtained as a result of Pigeon’s solicitation of money from the donors. According to CFDRs filed by WNYPC with the SBOE, Pigeon purportedly loaned WNYPC \$90,000.

14. WNYPC’s CFDR filings showed that WNYPC supported a number of candidates in the 2013 Erie County Democratic Primary. Among others, WNYPC supported Candidates 1, 2, and 3, who were running for various county and local offices. WNYPC paid expenses associated with each of these three candidate’s campaigns which exceeded the contribution limit for each candidate’s race. The OAG’s investigation has revealed that Pigeon, Mazurek, and Pfaff, on behalf of WNYPC, illegally coordinated with Candidates 1, 2, and 3, in violation of EL section 14-126 (5). Not only did WNYPC pay expenses for each of these candidates that exceeded the contribution limit, but Pigeon, Mazurek, and Pfaff communicated and coordinated

with the three candidates regarding campaign expenses that WNYPC incurred on each one's behalf.

**WNYPC ILLEGALLY COORDINATED WITH CANDIDATES 1, 2, and 3  
WITH RESPECT TO THE 2013 DEMOCRATIC PRIMARY**

**A. WNYPC'S ILLEGAL COORDINATION WITH CANDIDATE 1 (Count 1)**

15. In 2013, Candidate 1 ran for an Erie County office. The contribution limit set by the SBOE for Candidate 1's Democratic Primary election held on September 10, 2013 was \$1,476.50. On August 8, 2013, Person 1, a business associate of Pigeon's, forwarded him a list of the campaign contribution limits for a number of candidates, including Candidate 1.

16. On or about August 26, 2015, investigators from the OAG interviewed Candidate 1. Candidate 1 stated that Mazurek served as his campaign manager prior to the time that WNYPC came into existence. Candidate 1 said that after WNYPC was created, Mazurek told him she could no longer be his campaign manager because of WNYPC but, in fact, continued and even expanded the role she played in his campaign.

17. An examination of Candidate 1's CFDRs filed with the SBOE showed that very little money was raised and spent on his campaign prior to the September 10, 2013 Democratic Primary. Candidate 1's campaign committee received only \$450 between July 12, 2013 and September 16, 2013. In contrast, after WNYPC was established, WNYPC received over \$250,000 in contributions and spent money to pay vendors for expenses related to different candidates' campaigns, including Candidate 1's.

18. WNYPC actively engaged Candidate 1 and sought his input with respect to campaign literature pieces that WNYPC paid for on his behalf. I have reviewed WNYPC's bank records, vendors' invoices, and invoices for campaign literature pieces and determined that

WNYPC spent in excess of \$18,000.00 on behalf of Candidate 1's 2013 Democratic Primary campaign. Accordingly, the amount spent by WNYPC on Candidate 1's campaign exceeded the \$1,476.50 contribution limit established by the SBOE for this race by over \$16,500.00.

19. During an interview, Candidate 1 acknowledged that he "interacted" with Mazurek who he said "is WNYPC" in relation to the creation and design of literature pieces. I have reviewed emails exchanged from August 6, 2013 through September 9, 2013 where Pigeon, Mazurek, and Pfaff discussed literature pieces that were produced by different vendors in support of Candidate 1's campaign. The emails showed that Candidate 1 was contacted by Mazurek or Pfaff for biographical information and photographs, which Candidate 1 produced. These photos and information were then included in multiple campaign literature pieces that were paid for with WNYPC's funds. Pigeon asked Mazurek to arrange for a photo shoot of Candidate 1 because he wanted more pictures showing Candidate 1's presence at events attended by the elderly and children. Emails also showed that Candidate 1's approval was sought before a printing vendor hired by WNYPC was given the final authorization to move forward.

**B. ILLEGAL COORDINATION WITH CANDIDATE 2's CAMPAIGN**  
**(Count 2)**

20. Candidate 2 sought an Erie County office. The individual limit for a campaign contribution for that seat during the 2013 Democratic Primary was \$1,192.70. I have reviewed WNYPC's bank records, vendors' invoices, and invoices for campaign literature pieces and determined that WNYPC spent over \$13,000.00 on behalf of Candidate 2's 2013 Democratic Primary campaign. Accordingly, the amount spent by WNYPC in support of Candidate 2's campaign exceeded the \$1,192.70 contribution limit for this race by almost \$12,000.00.

21. On or about November 19, 2015, investigators from the New York State Police and the OAG interviewed Candidate 2. During that interview, Candidate 2 stated that Mazurek

ran his campaign. He said that Mazurek handled “all the money” for his campaign and arranged all of his campaign activities.

22. An examination of Candidate 2’s CFDRs filed with the SBOE prior to the September 9, 2013 Democratic Primary showed that his campaign raised and spent very little money. Between July 12, 2013 and September 16, 2013, the total contributions to Candidate 2’s campaign was \$700. Between August 27, 2013 and September 16, 2013, which included dates just before the September 9, 2013 primary, Candidate 2’s campaign spent no money at all. In contrast, WNYPC used its funds to pay for expenses incurred on behalf of Candidate 2’s campaign, and as noted above, exceeded the contribution limit for Candidate 2’s campaign by just under \$12,000. In addition to paying expenses for Candidate 2’s campaign, Mazurek, Pigeon, and Pfaff sought Candidate 2’s assistance and input with regard to the production of campaign literature pieces that supported Candidate 2’s candidacy.

23. I have reviewed emails exchanged from August 5, 2013 through September 10, 2013, in which Pigeon, Mazurek, and Pfaff discussed literature pieces that were produced by different vendors in support of Candidate 2’s campaign. Emails showed that Candidate 2 was contacted by Mazurek or Pfaff for biographical information, photographs and his resume. Candidate 2 provided the requested items, which then were used by printers in the production of literature pieces in support of his campaign. Emails further show Pigeon’s participation in making decisions about campaign literature pieces. For example, Pigeon asked Mazurek to arrange to get better photographs of Candidate 2. Mazurek then arranged for and attended the photography session, paying the photographer with WNYPC funds. Pigeon further directed Mazurek and Pfaff to send information about Candidate 2 to an individual who was preparing campaign literature and organizing Robo calls made in support of Candidate 2.

C. **ILLEGAL COORDINATION WITH CANDIDATE 3's CAMPAIGN**  
**(Count 3)**

24. Candidate 3 was a candidate for a local town office in Erie County during the 2013 Democrat Primary. Mazurek, Pfaff and Pigeon all worked on his campaign. WNYPC made payments to vendors on Candidate 3's behalf which totaled \$ 4,812.36. The contribution limit on Candidate 3's campaign for the 2013 Primary was \$ 1,550.10. Accordingly, the amount spent by WNYPC in support of Candidate 3's campaign exceeded the \$1,550.10 contribution limit for this race by over \$3,200.00.

25. I have reviewed emails exchanged from August 7, 2013 through September 6, 2013, which demonstrate that Pigeon, Mazurek, and Pfaff communicated with Candidate 3 concerning his campaign. For example, on August 12, 2013, Candidate 3 sent Mazurek an apparent draft of a letter he wanted to send to the Conservative Party. The next day, Mazurek emailed Pigeon: "Candidate 3 wants to know if your [sic] meeting today." The following day, August 14, 2013, Mazurek texted Pigeon: "Meet with Candidate 3...where do you want to meet at 5:15?" On August 15, 2013, Candidate 3 sent Mazurek an email attaching a draft letter entitled, "Candidate 3 Cons Letter" with the following message: "Ask Dave Pfaff to take a look and make corrections, comments..." Mazurek forwarded it to Pfaff and, a day later, Pfaff replied to Mazurek with several suggested edits to the letter. On August 23, 2013, Mazurek sent Candidate 3 the revised letter, which now included Pfaff's edits.

26. In addition, according to emails I have reviewed, Candidate 3 asked Mazurek and Pfaff for their opinions and suggestions regarding campaign mail. Candidate 3 met with Pigeon, Mazurek and Pfaff during the pre-primary period. Mazurek asked Pigeon about the plan for

Candidate 3's campaign. On or about August 26, 2013, Candidate 3 purchased campaign signs for \$1,510 and directed that they be shipped to Mazurek's home address. According to WNYPC's bank records, Mazurek wrote a check from WNYPC's account dated September 4, 2013 to pay that \$1,510 invoice. On August 29, 2013, WNYPC paid for postage and the cost of another mailer on behalf of Candidate 3's campaign by issuing two checks signed by Mazurek in the amounts of \$522.69 and \$880.88, respectively. On or about September 5, 2013, Candidate 3 purchased a mailer from a printing company, which issued three invoices, each for \$632.93. On the same day, September 5, 2013, WNYPC issued a check signed by Mazurek, in the amount of \$1,898.70 to pay those invoices.

27. As previously noted, virtually all the money raised by WNYPC that was spent on various campaigns, including Candidate 3's, was raised by Pigeon. In total, WNYPC spent \$3,262.26 over the contribution limits for Candidate 3's primary race.

**WNYPC'S 2013 11-DAY PRE-PRIMARY CFDR:  
REPORTING PERIOD AUGUST 6, 2013 THROUGH AUGUST 26, 2013 (Count 4)**

28. In addition to engaging in illegal coordination in violation of the Election Law, Pigeon, Mazurek, and Pfaff committed the crime of Offering a False Instrument for Filing in the First Degree, in violation of PL section 175.35, with respect to a CFDR filed by WNYPC with the SBOE. Mazurek, as WNYPC's treasurer, and Pigeon and Pfaff as agents of WNYPC, were each responsible for filing truthful statements, in the form of CFDRs, concerning WNYPC's financial activities.

29. A comparison of WNYPC's bank records to its CFDR filed with SBOE for the 2013 11-Day Pre-Primary reporting period revealed inconsistencies between the contributions received and deposited into its bank account and how those contributions were reported on WNYPC's CFDR for this reporting period. In particular, according to bank records, WNYPC

received three money orders, each one dated August 14, 2013, totaling \$2,500. On each of the three money orders, the name and address of the donor was given as Person 2.

30. On or about March 5, 2015, investigators from the State Police and FBI interviewed Person 2 and showed Person 2 those three money orders. Person 2 stated that Person 2 was not familiar with the three money orders and did not purchase them. Person 2 acknowledged that the address on the money orders was in fact where Person 2 resided and that the building at that address was owned by Person 2's employer, Person 3.

31. In or about April, 2015, investigators from the FBI, OAG, and State Police interviewed Person 3 who admitted that Person 3, and not Person 2, was the true donor of the \$2,500 contribution paid for with the three money orders. Person 3 stated that Pigeon had requested Person 3 to make a donation to the WNYPC, which Person 3 resisted because Person 3 did not want Person 3's name linked with Pigeon or to a Democratic Party caucus, because Person 3 was a member and staunch supporter of a different political party. Pigeon nevertheless persisted, and Person 3 ultimately agreed to make a donation under Person 2's name. Person 3 said Pigeon was aware that Person 3 would use someone else's name on the money orders and said it was "fine." On or about August 14, 2013, Person 3 gave the three money orders with the false information on them to Pigeon at a location in the city of Buffalo.

32. A review of the bank records of WNYPC revealed that Mazurek endorsed the reverse side of each of the three money orders, which were deposited on August 15, 2013 with two other checks. The bank statement for August 15, 2013 reflected a lump sum deposit of \$6,500.

33. SBOE records show that that WNYPC's CFDR for the 2013 11-Day Pre-Primary reporting period was filed by Pfaff with the SBOE on September 4, 2013. None of the three money orders was reported on WNYPC's CFDR. Another check in the amount of \$1,500,

deposited the same day as the money orders, was instead reported as a \$4,000 donation on the CFDR, thus hiding both the name of the actual donor and the existence of the money order donations themselves. On September 13, 2013, the CFDR was amended and re-filed by Pfaff with the SBOE (adding an address for one of the donors), but the amended and re-filed CFDR contained no corrections with regard to the money orders and the \$4,000 donation reported on the initial CFDR.

34. On September 4, 2013, Pfaff sent an email to Mazurek, entitled "A 19577 FILING", attaching a copy of WNYPC's CFDR for the 2013 11-Day Pre-Primary reporting period that he had sent to the SBOE. As previously noted, this filing was later amended, but neither version corrected the false information therein.

**False statements made herein are punishable as a Class A misdemeanor pursuant to Penal Law section 210.45.**

Dated: Buffalo, New York  
April 19, 2017

  
Brian G. Ross, Investigator  
Office of the New York State  
Attorney General