

21. Rodriguez is a stock promoter who, in exchange for a fee, facilitated purchases of publicly traded stock with the objective of illegally manipulating the market for that stock by artificially creating demand.

22. On or about June 12, 2008, Kanakaris asked Rodriguez and the CW to join the scheme to manipulate SwedishVegas stock.

23. During the June 12 conversation, Kanakaris agreed to pay the CW a fee equal to 20 percent of the value of any purchases of SwedishVegas stock that the CW could generate through corrupt registered representatives who would secretly purchase SwedishVegas stock in customer brokerage accounts. Rodriguez arranged with Kanakaris and the CW to be paid a percentage of that kickback for introducing the two parties.

24. Kanakaris also claimed that he controlled the release of SwedishVegas corporate news. He told the CW that he would provide the CW with SwedishVegas press releases prior to their public release, and that SwedishVegas would be issuing a press release the following day.

25. Kanakaris told Rodriguez and the CW that he wanted them to buy as much stock as possible and to make the stock price "fly," and indicated that he would be the only seller in the market on the day the trades took place. He also said he would provide the CW with SwedishVegas shareholder lists.

26. On the morning of June 13, 2008, Kanakaris sent an email to the CW attaching an advance copy of a SwedishVegas press release announcing that SwedishVegas would be auctioning an all-inclusive weekend in Las Vegas. Kanakaris indicated that the news would be released later that day, at 2:00 p.m. Eastern Time. He also told him when the next press release would be issued.

27. As promised, at 2:00 p.m., SwedishVegas issued the press release that Kanakaris had sent to the CW earlier that morning.

28. Later that day, in conjunction with the arranged agreement, Kanakaris and Epstein caused approximately \$15,000 to be wired to an account controlled by Rodriguez as an advance fee for causing or generating future purchases of SwedishVegas stock.

29. Upon receipt of these funds, Rodriguez wired \$7,500 to an account that he believed was controlled by the CW, but which was actually an undercover account of the FBI in Philadelphia, Pennsylvania. He kept the remaining \$7,500 for himself as a fee.

30. On or about June 16, 2008, Kanakaris emailed Rodriguez stating that Rodriguez needed to get results back to Epstein within 24 hours or he would need to return the kickback payment to Epstein.

31. On or about June 17, 2008, Kanakaris told the CW that he wanted the buying program in SwedishVegas stock to begin on the following day. In a separate conversation, Epstein also told Rodriguez that he had provided the kickback money and that he wanted the purchases of SwedishVegas stock to be done immediately or Rodriguez should return the payment.

32. On or about June 27, 2008, during a telephone call Kanakaris complained to the CW that Epstein had wired the \$15,000 payment to Rodriguez to begin the buying program in SwedishVegas stock, but that the buying had not yet occurred. Kanakaris urged the CW to get the buying program started as soon as possible.

33. On or about June 30, 2008, during a telephone call at approximately 11:30 a.m., Kanakaris further complained to the CW about problems with Rodriguez and again confirmed that Kanakaris would pay the CW a 20 percent fee for the artificial buying activity he was to create in SwedishVegas stock.

34. Later that day, Epstein discussed the buying program in SwedishVegas stock with the CW. Epstein reiterated that he had already paid for what he expected would be \$50,000 in

