

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA,
Plaintiff,

v.

\$560,421.14 SEIZED FROM BANK OF
AMERICA ACCOUNT ENDING -9857
HELD IN THE NAME OF MAZIV
ENTERTAINMENT LLC,
Defendant.

[CLAIMANTS: MAZIV
ENTERTAINMENT LLC; JAMIE
PETRONE-CODRINGTON]

No.

November 23, 2021

VERIFIED COMPLAINT OF FORFEITURE

Now comes Plaintiff, United States of America, by and through its attorneys, Leonard C Boyle, Acting United States Attorney for the District of Connecticut, and David C. Nelson, Assistant United States Attorney, and respectfully states that:

1. This a civil *in rem* action brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C) for the forfeiture of property which constitutes or is derived from proceeds traceable to an offense constituting “specified unlawful activity” (as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1)), namely wire fraud in violation of 18 U.S.C. § 1343, or conspiracy to commit such offense.

2. This Court has jurisdiction over this matter by virtue of 28 U.S.C. §§ 1345 & 1355. Venue is appropriate in the District of Connecticut by virtue of 28 U.S.C. § 1395(b).

3. The Defendant is \$560,421.14 seized from Bank of America Account Ending -9857 held in the name of Maziv Entertainment LLC (“Defendant Asset”).

4. The Defendant Asset is located within the jurisdiction of this Court.

BACKGROUND OF INVESTIGATION

5. On August 25, 2021, Yale University personnel briefed law enforcement about an apparent embezzlement scheme they uncovered. Yale received an anonymous tip, by word of mouth, approximately sometime over the last year, that Yale University School of Medicine Emergency Medicine Department Lead Administrator Jamie Petrone-Codrington (“Petrone-Codrington”) was ordering suspiciously high volumes of computer equipment, some of which was placed into her personal vehicle. For various reasons, Yale was not able to mount a concerted investigative effort until approximately July 1, 2021.

6. Independent of the anonymous tip, Petrone-Codrington was questioned in approximately June 2020 regarding a budget variance and a high volume of computer equipment being purchased by her department, primarily from vendors GovConnection.com and Apple, Inc. Petrone-Codrington responded to the inquiry that her department was updating their equipment and was also working with Yale New Haven Health (YNNH) on a new program.

7. During the week of August 16, 2021, Yale auditors inquired with a high-ranking Yale School of Medicine official who had no knowledge of the program referenced by Petrone-Codrington in her explanation to Yale’s General Accounting Department.

8. As part of their investigation, Yale auditors reviewed purchase orders and Petrone-Codrington’s Yale emails, among other things, and reported certain findings to law enforcement.

9. According to Yale’s investigation, since fiscal year 2018, Petrone-Codrington has drafted thousands of purchase orders, each below \$10,000, the amount at which additional approvals would have been required. The aggregated amount of the purchases requested by or for Petrone-Codrington since fiscal year 2018 is estimated to be in the tens of millions of dollars.

Since January 2021, Petrone-Codrington arranged for Yale's purchase of approximately eight thousand iPads and Surface Pro tablets. From approximately May 27, 2021 to August 19, 2021, Petrone-Codrington ordered approximately \$2.1 million in computer equipment on behalf of Yale. On August 24, 2021, Petrone-Codrington placed an order for equipment totaling approximately \$144,000.

10. Many of the devices purchased by Petrone-Codrington with Yale money were sold and shipped by Petrone-Codrington to a purported business in New York. Petrone-Codrington's emails revealed transactions between Petrone-Codrington and entities identified as ThinkingDealsLLC, ThinkingMacLLC, and others. ThinkingDealsLLC and ThinkingMacLLC both resolve to ThinkingMacLLC in business filings. ThinkingDealsLLC, ThinkingMacLLC, and others (the "customers") placed orders with Petrone-Codrington via email for the same type of computer equipment that Petrone-Codrington purchased from Yale vendors. In those emails, the customers identified quantities and descriptions of electronic devices, and attached shipping labels with both sender and recipient addresses outside of Connecticut. According to FedEx records, tracking numbers associated with some of those orders were recorded by FedEx as being hand delivered to and shipped from locations within Connecticut.

11. Yale records show that on May 26, 2021, Petrone-Codrington directed her assistant to prepare documentation for an order of 100 Microsoft Surface Pro 7 CORE i5 8 GB/256 GB tablet computers, which Petrone-Codrington claimed were for a new study to be launched on Memorial Day weekend. Accordingly, Petrone-Codrington's assistant prepared 12 purchase orders for 8 Surface Pros each (totaling \$9,102.56 per order) and one purchase order for 4 Surface Pros (totaling \$4,551.28). On May 27, 2021, the email address "sales@thinkingdeals.com" sent an email to Petrone-Codrington with the subject line "Label

5/27/2021,” and the text “Contents: 100 X SP 7 512 GB i7.” The email attached a .pdf file with 10 FedEx labels, each addressed to “WILLISTON PARK NY 11596,” and purporting to be from “ThinkingDEALS LLC” in “NOVI MI 48374.” The labels each contained unique tracking numbers. FedEx records show that packages with those tracking numbers were shipped from Orange, Connecticut, on June 3, 2021 and delivered on June 4, 2021 to Williston Park, New York.

12. In one of Petrone-Codrington’s emails, she attached bank statements from a business named Maziv Entertainment LLC, located in Naugatuck, Connecticut, which is Petrone-Codrington’s residential address. Petrone-Codrington is listed in Connecticut Secretary of the State records as the principal of Maziv Entertainment LLC and her husband is listed as a member. State records list the status of the business as dissolved due to the failure to file annual reports. The bank statements for Maziv are from February through May 2021 and show hundreds of thousands of dollars in incoming wire transfers from ThinkingMacLLC. Among others, the records show an incoming wire from ThinkingMacLLC on May 27, 2021 (the date of the above example) in the amount of \$71,800.00.

13. Queries within the online FedEx tracking platform for several of the FedEx tracking numbers found within Petrone-Codrington’s emails revealed that packages shipped to Williston Park, New York (the “Williston Park Residence”) were signed for by an individual named “ALAM.” Law enforcement queries for residents of the Williston Park Residence showed that an individual named Allen Lam was associated with the residence. Criminal history record checks revealed Allen Lam was previously convicted (in 2012) in the courts of the State of New York for “enterprise corruption.”

14. Law enforcement was informed by FedEx that on August 25, 2021, seven additional packages were again shipped to “WILLISTON PARK NY 11596,” purporting to be from “ThinkingDEALS LLC” in “NOVI MI 48374.” The packages were hand-delivered to the FedEx location on Boston Post Road in Orange, Connecticut. These packages are consistent in weight in size as potentially containing additional tablet computers. Law enforcement has viewed FedEx-provided surveillance photos, which appear to show Petrone-Codrington delivering the packages to the FedEx location in Orange, Connecticut and arranging for their shipping as described above.

15. As set forth above, ThinkingDealsLLC and ThinkingMacLLC are both associated with ThinkingMacLLC. Moreover, ThinkingDealsLLC, ThinkingMacLLC, and others have placed orders with Petrone-Codrington via email for the same type of computer equipment that Petrone-Codrington purchased from Yale vendors.

16. ThinkMacLLC sells iPads and the associated accessories.

17. Petrone-Codrington applied for a PayPal Business Loan. PayPal responded to Petrone-Codrington on or about June 1, 2021 and asked for four months of bank statements. Petrone-Codrington responded to PayPal on or about June 2, 2021, from her Yale.edu email address and attached bank statements. As a result of this email exchange, as well other emails from Petrone-Codrington’s Yale.edu account email, law enforcement was able to review bank statements for bank account ending -9857 at Bank of America held in the name of Maziv Entertainment LLC (“Bank Account ending -9857”) from February to May.

18. Bank records from Petrone-Codrington’s emails recovered from Yale, concerning Bank Account ending -9857, demonstrate Bank Account ending -9857 received significant

amounts of money from “Thinking Mac LLC.” The following chart sets forth the wire transfers from “Thinking Mac LLC” to Bank Account ending -9857.

Date of Wire Transfer <i>from</i> Thinking Mac LLC to Bank Account Ending -9857	Amount of Wire Transfer
February 3, 2021	\$93,000.00
February 10, 2021	\$83,552.00
February 18, 2021	\$93,552.00
February 24, 2021	\$82,728.00
March 3, 2021	\$93,000.00
March 5, 2021	\$82,000.00
March 12, 2021	\$82,400.00
March 31, 2021	\$87,000.00
April 7, 2021	\$88,500.00
April 9, 2021	\$72,000.00
April 13, 2021	\$95,500.00
April 22, 2021	\$69,120.00
May 3, 2021	\$91,000.00
May 12, 2021	\$88,000.00
May 19, 2021	\$94,730.00
May 27, 2021	\$71,800.00
Total:	\$1,367,882.00

19. It should also be noted that there were other significant wire transfers into Bank Account ending -9857. For example, in March of 2021, “AC Trading LLC” transferred approximate \$177,000 into this account.

20. AC Trading LLC is associated with ThinkingMacLLC.

21. The bank statements from February through May demonstrate that Petrone-Codrington utilized Bank Account ending -9857 to pay Federal Express shipping charges on a regular basis, consistent with the observed behavior of shipping the fraudulently purchased computer equipment via Federal Express. Additionally, Petrone-Codrington also used Bank Account ending -9857 to transfer funds into two other Bank of America accounts. Petrone-

Codrington also used Bank Account ending -9857 to, among other things: (1) pay for payroll for Maziv Entertainment LLC; (2) pay for home improvements, to which law enforcement believes were for Petrone-Codrington's Connecticut home; (3) purchase approximately \$25,000 in jewelry; and (4) pay for personal items such as food orders.

22. On August 31, 2021, law enforcement executed a federal seizure warrant on Bank Account ending -9857 and seized \$560,421.14.

CONCLUSION

23. Based on the information set forth above, the defendant \$560,421.14 seized from Bank of America Account Ending -9857 held in the name of Maziv Entertainment LLC were obtained knowingly by a scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice in violation of 18 U.S.C. § 1343, and are therefore, subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) for the forfeiture of property which constitutes or is derived from proceeds traceable to an offense constituting "specified unlawful activity" (as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1)), namely wire fraud in violation of 18 U.S.C. § 1343, or conspiracy to commit such offense.

Wherefore, the United States of America prays that a Warrant of Arrest In Rem be issued for \$560,421.14 seized from Bank of America Account Ending -9857 held in the name of Maziv Entertainment LLC; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the property to be condemned and forfeited to the United States of America for disposition according to law; and

that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

LEONARD C BOYLE,
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DECLARATION

I am a Special Agent with the Federal Bureau of Investigation, United States Department of Justice, and the individual assigned the responsibility for this case.

I have read the contents of the foregoing Verified Complaint of Forfeiture and the statements contained therein are true to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of November, 2021.

/s/ Shane L. Young
SHANE L. YOUNG
SPECIAL AGENT, FBI