

An individual purportedly named Jeremy Maniak contacted me via email, asking if my law firm was available to draft a purchase agreement. The email came from the address jeremymaniak91@gmail.com. I stated that I was available to help. He responded as follows:

“Hello ,

I hope you are safe and doing well, My office has been contacted by a hospital in your state to purchase our respiratory ventilators. I have agreed to sell 10 pieces of the ICU Respiratory Ventilator to . Each ventilator cost \$33,420, I need your urgent help to draft the purchase agreement. Please find below attached details of the ventilator for your review.

This is a straight forward transaction. Buyer wants the agreement to be governed by the laws of their state. Buyer will take responsibility of shipping cost and risk of damage. This is a no title Machine. Timing - Sales will be finalized once both parties have signed the purchase agreement and full payment made. This transaction is a cash transaction and “as is”, with no financing and sale closes once full payment is made.

Advice on your rate and cost of representation. Kindly email your engagement letter for review and signature.

Thank you for your consideration and Stay Safe!”

I sent a retainer and a draft of the contract. He then told me the seller's agent would send a check for a down payment of \$133,680 and a Letter of Intent. I received this check USPS Priority Mail on Friday May 15, and deposited it in my client trust account. Although the check was labeled as a Cashier's Check from CitiBank, the full balance was not made available right away. I thought this was because I had only recently opened my client trust account. I was asked to wire the \$5000 that my bank made available so the transaction could move forward quickly, and any additional amount that could be made available. I agreed to advance \$10,000 in addition to the \$5,000 made available from the check, and made two wire transfers consistent with these instructions, sent via email:

"Wire transfer the sum of \$5,000 for inspection of the equipment. Bank Name: Name: Beneficiary Address: Account No: Routing No: Bank Address: And wire transfer the sum of \$10,000 for insurance of the equipment Bank Name: Beneficiary Name: Beneficiary Address: Checking Account No: Routing No: Swift code: Bank Address: .

My bank rejected the check and charged me back the entire amount. I have since called "Mr. Maniak" and his number is now disconnected. I have emailed several times for follow up and received no response. I notice that the Letter of Intent is signed by an individual who quit the brokerage company 5 years ago.

Accordingly, it appears that this individual committed wire and mail fraud, among other crimes. There is an individual named Jeremy Maniak who is the President of , the purported client. I now believe the individual I spoke to was an imposter. His use of a gmail account should have tipped me off, but I have seen legitimate clients use gmail accounts before and was not surprised.