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INTRODUCTION

connected to Federal Recoveries (Id. at 69 \P 22-23, Att. E), Federal Processing (Id. at 70 \P 27,

Att B. Folan & Charle Brown and At at 71 1820 Attal & History Charles Brown in all hat 72 1820

imprisoned: (3) Defendants are affiliated with government entities, including law enforcement

Complaint.

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have engaged in fraudulent practices are likely to waste assets before resolution of the action. See SEC v. Spongetech Delivery Sys., Inc., No. 10-CV-2031 (DLI)(JMA), 2011 WL 887940, at *5 (S.D.N.Y. 2011) ("A freeze is particularly warranted where the defendant's alleged conduct