

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, ANTHONY FRY, being duly sworn, deposes and says that I am a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

Upon information and belief, from in and around March 2020 through current, within the Northern District of Ohio and elsewhere, the defendants, THOMAS COLLINS, PATRICK THOMAS, together with others, did knowingly and intentionally attempt to execute a scheme and artifice to defraud investors and potential investors in connection with Global Resource Energy, Inc. to obtain money and property from investors and potential investors by means of materially false and fraudulent pretenses, representations, and promises in connection with purchases and sales of securities of issuers, specifically Global Resource Energy, Inc. in violation of Title 15, United States Code, Sections 78j(b), 78ff, Title 17; Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Section 371.

In addition, based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 15, United States Code, Sections 78j(b), 78ff; Title 17, Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Section 371 have been committed by THOMAS COLLINS, PATRICK THOMAS, and others, known and unknown.

The source of you affiant’s information and the grounds for his belief are as follows:

**INTRODUCTION**

1. I have been a Special Agent with the FBI since September 2018. I am currently assigned to an FBI squad which investigates securities fraud, wire fraud, and other financial crimes. During my tenure with the FBI, I have participated in financial fraud investigations involving stock market manipulation and other illegal manipulative trading schemes. I have

participated in all aspects of investigations including executing search warrants, debriefing defendants and informants, interviewing witnesses, and reviewing and analyzing recorded interstate telephone conversations.

2. I have personally participated in the investigation of securities fraud by THOMAS COLLINS and PATRICK THOMAS, among others, as discussed below. I am familiar with the facts and circumstances of this investigation, through discussions with other law enforcement agents and undercover law enforcement agents involved in this investigation, and through my review of consensual recordings, and federal grand jury subpoena returns, among other sources of evidence.

3. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts of which I learned from other law enforcement agents. Because this affidavit is being submitted for the limited purpose of establishing probable cause to request the issuance of a federal criminal complaint, I have not set forth each and every fact learned during the course of this investigation. Instead, I have set forth only those facts that I believe are necessary to establish probable cause to support the issuance of a federal criminal complaint. In addition, where the contents of documents, or the actions, statements, and conversations of others are reported herein, they are reported in sum and substance in part except where otherwise indicated. Summaries of recorded interstate telephone conversations are based upon draft transcripts and summaries of these conversations, which are subject to revision.

**PROBABLE CAUSE**

Relevant Regulatory Principles and Definitions

4. The United States Securities and Exchange Commission, hereinafter referred to as the SEC, was an independent agency of the United States which was charged by law with protecting investors by regulating, and monitoring, among other things the purchase, and sale of publicly traded securities, including securities traded on the United States based stock exchanges.

5. Federal securities law, and regulations prohibited fraud in connection with the purchase, and sale of securities, including the use of false and misleading statements and the failure to disclose material information to: (a) the SEC in publicly available filings; (b) brokerage firms, and transfer agents involved in the purchase, and sale of stock in companies subject to SEC regulation; and (c) the public. Federal securities laws and regulations also prohibited the manipulation of stock through, among other things, sales made at the times and at prices set by those trading the stock rather than by market forces.

6. Title 15, United States Code, Section 78j(b) makes it a federal offense for any person directly, or indirectly, by the use of any means or instrumentality of interstate commerce or of the mails, or of any facility of a national securities exchange, to use or employ, in connection with the purchase or sale of any security registered on a national exchange, any manipulative, or deceptive device or contrivance in contravention of such rules and regulations as the SEC may prescribe as necessary or appropriate in the public interest or for the protection of investors, including: (a) employing devices, scheme, and artifices to defraud; (b) making untrue statements of fact or omitting to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (c) engaging in acts, practices, and courses of business which operated as a fraud upon investors,

in connection with the purchase and sale of the securities. Failure to disclose to investors commission payments from third parties, including payments from issuers, was considered an omission of a material fact as part of a securities transaction.

7. Title 18, United States Code, Section 371 (Conspiracy to commit securities fraud) two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy.

8. An over-the-counter market (“OTC”) is a decentralized market in which market participants trade stocks, commodities, currencies, or other instruments directly between two parties and without a central exchange or broker. OTC markets do not have physical locations, but instead trading is conducted electronically. In an OTC market, dealers act as market-makers by quoting prices at which they will buy and sell a security, currency, or other financial product. A trade can be executed between two parties in an OTC market without others being aware of the price at which the securities transaction was completed. OTC markets are typically less transparent than exchanges and are also subject to fewer regulations.

9. “Microcap” or “penny” stocks referred to stocks of publicly traded United States companies which had low market capitalization. Microcap stocks were subject to price manipulation because they were thinly traded and subject to less regulatory scrutiny than stocks that were traded on notable exchanges such as the National Association of Securities Dealers Automated Quotes (“NASDAQ”), and the New York Stock Exchange (“NYSE”). The NASDAQ, and NYSE had specific standards that were monitored and enforced for a company to have its stock traded on those exchanges. Additionally, large blocks of these type of stocks were

often controlled by a small group of individuals, which enabled those in the group to control and orchestrate manipulative trading in those stocks.

10. A pump and dump scheme was a securities fraud scheme that typically involved the artificial inflation of the stock price of a publicly traded company (the “pump”) so that individuals who control a substantial portion of the company’s stock can sell shares of that stock at artificially high prices to other investors (the “dump”) in the open market. Generally, pump and dump schemes effected the artificial inflation in stock share price by, among other things, issuing new releases, and promotional materials regarding the company, and its stock. These press releases often contain false, misleading, or exaggerated information, and are timed for the greatest enrichment of the individuals who control a substantial portion of the company’s stock. In addition, pump and dump schemes engage in manipulative trading of the stock to effect its share price, and generate the appearance of demand for the stock shares.

11. As a result of a pump and dump independent third-party purchasers were subsequently left with a near worthless security when the price dropped to accurately reflect the stocks true value, or lack thereof, in the open market. There were generally three phases to a pump and dump scheme; (a) first, obtaining and concealing control of a significant portion of a publicly traded company’s stock, (b) second, fraudulently inflating or keeping inflated the price, and trading volume of the company’s stock through a variety of means, and (c) third, once the price of the stock was fraudulently inflated, selling the stock using the fraudulently inflated price as a benchmark, thereby, profiting at the expense of the investing public.

Defendants, Relevant Persons, Entities, and Financial Accounts

12. THOMAS COLLINS was a resident of Weatherford, Texas.

13. PATRICK THOMAS was a resident of Carrollton, Texas.

14. GLOBAL RESOURCE ENERGY, INC., (“GBEN”), was a publicly traded Nevada corporation, and was registered on or about November 6, 2008, with its principal place of business in Fort Worth, Texas. Individual-1 was the Chief Executive Officer and Chief Financial Officer of GBEN. GBEN purported business purpose was focused on the Health and Wellness, Green, and Lifestyle sectors, specifically the manufacturing, and distribution of a ready-to-drink hemp infused cocktails, under the name Hemp Hazed. GLOBAL RESOURCE ENERGY, INC. traded on OTC Markets under the ticker GBEN.

15. GULF COAST M&A LTD, hereinafter referred to as GCMA, was a for profit Corporation with its principal place of business at 30 N. Gould Street, Sheridan, Wyoming. GCMA was formed on or about April 9, 2020. GCMA had a bank account number x9842 at Wells Fargo Bank which was controlled by THOMAS. GCMA address as listed with the transfer agent was Abraham Gonzalez 83 #402 CP, Mexico City, Mexico. The stock transfer agent account for GCMA was controlled by THOMAS.

#### The Fraudulent Scheme

16. On or about March 6, 2020, Undercover Employee-1, hereinafter referred to as UCE-1, had a consensually recorded interstate telephone conversation with THOMAS. THOMAS informed UCE-1 that THOMAS was stock rich, and cash poor. THOMAS and UCE-1 discussed a potential investment into GBEN by UCE-1. THOMAS discussed his (THOMAS) ownership of a convertible note in GBEN, and that THOMAS had an agreement with COLLINS that THOMAS would “not slam the stock.” THOMAS told UCE-1 that THOMAS “can turn some guys on and start hammering it out to create more volume.” when referring to GBEN. THOMAS discussed his (THOMAS) ownership in GBEN which consisted of approximately 2,300,000 million shares in brokerage accounts, and 2,000,000 shares with THOMAS’s family

trust in Europe which THOMAS controlled. THOMAS stated of the 7,500,000 free trading shares in GBEN in the open market, THOMAS controlled approximately 4,300,000 of those shares.

17. On or about March 9, 2020, UCE-1 had consensually recorded interstate telephone conversation with THOMAS. THOMAS informed UCE-1 that THOMAS had spoken with COLLINS, but COLLINS had to be careful when they spoke about the GBEN (since COLLINS was a company insider). THOMAS informed UCE-1 that THOMAS needed GBEN to “kick off” because he has so much money tied into GBEN and THOMAS had funded GBEN for the last one and a half years. THOMAS stated that once UCE-1, COLLINS, and THOMAS agree to an investment amount, THOMAS will agree to give GBEN a line of credit with a portion of the proceeds from selling free trading shares to UCE-1. THOMAS further stated he (THOMAS) did not think that was illegal, but directly funding GBEN from the sale of free trading stock is “illegal as hell.”

18. On or about March 11, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS. THOMAS informed UCE-1 that THOMAS’s attorney told him that, the free trading stock deal would not be a problem, but just “paper it up good.” THOMAS stated that the attorney told him the “devil is in the details.” THOMAS informed UCE-1 that THOMAS spoke with COLLINS, and COLLINS stated GBEN needed cash, and THOMAS was willing to do whatever for everyone to win.

19. On or about March 16, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS. THOMAS informed UCE-1 that COLLINS needed \$100,000. THOMAS informed UCE-1 that THOMAS was going to pay someone to “put eyeballs on the stuff” in order to generate some liquidity for GBEN.

20. On or about March 24, 2020, UCE-1 had a consensually recorded telephone call with THOMAS. THOMAS informed UCE-1 that THOMAS owned the convertible notes in GBEN. THOMAS stated that if UCE-1 invested into GBEN, only THOMAS and UCE-1 would be “floating the share price.” THOMAS stated that his notes are convertible at \$0.001 par value, and anything above that price would make both UCE-1 and THOMAS money. THOMAS expressed the need to find someone who could bring liquidity in the stock, and stated they needed to “get some eyes on it” and “let it get ripping.” THOMAS informed UCE-1 that THOMAS had not converted his (THOMAS) notes because of THOMAS’s relationship with COLLINS, and THOMAS “ate” 20,000 shares today in volume because COLLINS wanted to keep the stock price up. THOMAS had held shares of GBEN for approximately a year and a half and acknowledged that GBEN’s stock price would take a dive without THOMAS holding it up. THOMAS stated did not want to sell the stock down to a penny, but even at a penny THOMAS would have a 10 times profit.

21. Based on my training, experience, and discussions with other law enforcement agents, during the series of calls with UCE-1 between March 6, 2020 and March 24, 2020, THOMAS’s discussed schemes to run a stock promotion, which would induce investors into purchase shares of GBEN in order to increase the volume of shares traded in the market, and allow THOMAS to sell shares of GBEN for a profit as part of a pump and dump scheme.

22. On or about March 27, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS. THOMAS asked UCE-1 if UCE-1 had spoken to his friend (UCE-2) about bringing “firepower” to GBEN. UCE-1 asked THOMAS if COLLINS was still looking to complete a restricted stock deal, or if THOMAS would take care of COLLINS from the stock deal between UCE-1, and THOMAS. THOMAS confirmed to UCE-1 that



THOMAS would take care of COLLINS. THOMAS and UCE-1 discussed having many options with GBEN and running a promotional program through UCE-2 for GBEN. THOMAS informed UCE-1 that THOMAS could structure the deal through foreign corporations that were in THOMAS's sisters name.

23. On or about March 29, 2020, UCE-1, and UCE-2 had a consensually recorded interstate telephone conversation with THOMAS. The UCEs, and THOMAS discussed engaging an investor relations firm to run a stock promotion on GBEN. THOMAS informed the UCEs that COLLINS wanted GBEN to be a higher priced stock, but THOMAS didn't believe GBEN would trade between \$0.70 and \$0.80. THOMAS stated, "I'm just looking to make some money to be straight up with you." THOMAS informed the UCEs that THOMAS had been in GBEN for almost two years and stated "we can get down and dirty with it" by converting THOMAS's notes into approximately 200,000,000 shares. UCE-2 discussed the possibility of engaging an investor relations firm that could run a call room, and e-mail list, and asked THOMAS about running a three day, or long-term program. THOMAS preferred a longer play because they are limited on how many shares they could sell. THOMAS informed the UCEs that COLLINS told THOMAS, if they needed more "sizzle" for the promotion, COLLINS had several acquisitions GBEN could make. UCE-2 asked THOMAS to send the UCEs over news that GBEN could release.

24. On or about April 2, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS, and COLLINS. UCE-1 and THOMAS discussed news and potential acquisitions for GBEN. THOMAS informed UCE-1 that COLLINS had a large amount of news which could be released on Hemp Haze. At this point in the conversation, THOMAS conferenced COLLINS into the conversation. COLLINS informed UCE-1, GBEN had a lot of news to release about the company and stated. "they are about ready to pop."

COLLINS informed UCE-1 that GBEN was in need of \$150,000. UCE-1 asked COLLINS to e-mail some of the news that COLLINS had to release. COLLINS responded he (COLLINS) would figure a way to send UCE-1 the information and be careful about insider information. THOMAS informed UCE-1 that they could run the program, sell out of stock, and reload with shares for another round of promotion.

25. On or about April 6, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS. THOMAS discussed an arrangement to run a promotion of GBEN with the UCEs. THOMAS and UCE-1 discussed running a four to six-week promotional program. THOMAS told UCE-1 that THOMAS had more than enough shares of GBEN and would like to partner with UCE-1 and “run the dog snot out of this thing.” THOMAS stated he (THOMAS) did not care what price they ran the program because THOMAS just wanted to make money. THOMAS further informed UCE-1 that THOMAS would talk to COLLINS, and COLLINS would coordinate press releases with the UCEs in conjunction with the promotional program.

26. On or about April 8, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS. UCE-1 told THOMAS that UCE-2 and the promotional firm expressed concern about running a promotion on GBEN, and that the stock would not trade above \$1.00 per share. THOMAS informed UCE-1 that THOMAS was holding GBEN’s share price up, and the share price would decrease once THOMAS began selling shares. UCE-1 told THOMAS the UCEs needed more shares of GBEN in order to run a promotional campaign. UCE-1 and THOMAS discussed the promotional scheme which included letting the share price of GBEN fall, then increasing the share price from \$0.25 per share to approximately \$0.75 per share through the promotion. THOMAS agreed to sell 1,000,000 shares of GBEN for the UCEs

at a discounted price for the UCEs to sell during the promotion. THOMAS informed UCE-1 that THOMAS had up to 200,000,000 shares of GBEN and would be happy to sell as many shares as possible. THOMAS had over \$500,000 invested in GBEN and wanted to make \$2,000,000 on the deal. THOMAS stated COLLINS had news and acquisitions to announce which would help the promotion.

27. On or about April 8, 2020, UCE-1 received an e-mail from THOMAS, e-mail address THEPATRICKRAY@protonmail.com. The e-mail contained three subscription agreements for the purchase of free trading shares of GBEN in the amounts of \$25,000 (500,000 shares), \$37,500 (750,000 shares), and \$50,000 (1,000,000 shares). The subscription agreements disclosed that Gulf Coast M&A, LTD located at 2712 Creel Ln, Carrollton, Texas 75010 was the seller of the free trading shares of GBEN.

28. On or about April 10, 2020, UCE-1 sent THOMAS an e-mail, e-mail address THEPATRICKRAY@protonmail.com. The email contained a signed subscription agreement for the purchase of 500,000 shares of GBEN stock in the name of UCE-3 from Gulf Coast M&A LTD in the amount of \$25,000. On the same date, THOMAS countersigned the subscription agreement, and returned it, via e-mail, to UCE-1.

29. Based on my training, experience, and discussions with other law enforcement agents, during the series of telephone calls and emails with UCE-1 and UCE-2 between March 29, 2020 and April 10, 2020, THOMAS's agreed to sell shares of GBEN at a discount to the UCEs, in order for THOMAS and the UCEs to sell shares during the arranged pump and dump, in violation of 18 U.S.C. § 371, and 15 U.S.C. §§ 78j(b), 78ff and 17 C.F.R § 240.10b-5.

30. On or about April 13, 2020, UCE-1 received an e-mail from THOMAS, e-mail address THEPATRICKRAY@protonmail.com. The e-mail contained bank wiring instructions

for the Wells Fargo bank account, in the name of Gulf Coast M&A LTD, 30 N. Gould Street Ste R, Sheridan, Wyoming 82801, ending in x9842, controlled by THOMAS. On the same date, THOMAS sent UCE-1 another e-mail containing a list of upcoming press releases for GBEN, which included new product runs, expansion plans, new state licenses, and potential acquisitions.

31. On or about April 16, 2020, the FBI sent an interstate wire transfer of \$25,000 from an FBI controlled bank account located in Cleveland, Ohio to Wells Fargo bank account ending in x9842 in the name of Gulf Coast M&A LTD located in Sheridan, Wyoming for the purchase of 500,000 free trading shares of GBEN.

32. On or about April 16, 2020, UCE-2 had a series of consensually recorded interstate telephone conversations with THOMAS. THOMAS stated GBEN only had approximately 1,100,000 shares in the market that were not controlled by THOMAS. UCE-2, and THOMAS discussed liquidating approximately 1,000,000 shares each through the two to six-week promotion. THOMAS stated he (THOMAS) had enough "bid support" to sell 100,000 shares down to \$0.15 and \$0.20 cents, and once the price was lowered, THOMAS would arrange for approximately 15,000 to 25,000 shares of weekly trading volume. At that point, the promotional program could kick-off, which would allow THOMAS, and UCE-2 to liquidate approximately 2,000,000 shares at a price of between \$0.20 and \$0.25 per share. THOMAS stated he (THOMAS) owned all of the notes listed on the OTC Markets disclosure statements, but the disclosure statement had not been updated to display THOMAS's ownership.

33. On or about April 17, 2020, UCE-1, and UCE-2 had a consensually recorded interstate telephone conversation with THOMAS. THOMAS discussed several companies and a scheme to merge the companies into GBEN to help with the promotion. On the same date, UCE-

1 received an e-mail from THOMAS, e-mail address THEPATRICKRAY@protonmail.com. The e-mail contained a business plan for the company Vitalogy Wellness Center.

34. On or about April 23, 2020, UCE-2 had a consensually recorded interstate telephone conversation with THOMAS. THOMAS stated that THOMAS had spoken with COLLINS about the plan to merge a business into GBEN to add some “sizzle” to the promotion. UCE-2 told THOMAS in order to run a promotion, UCE-2 would need two press releases per week for two to three weeks. UCE-2, and THOMAS discussed strategies for the promotion, and timing the announcement for the acquisition. UCE-2, and THOMAS further discussed running the stock, in the initial promotion, at \$0.25 to \$0.35 a share.

35. On or about April 27, 2020, UCE-2 had a consensually recorded interstate telephone conversation with THOMAS. THOMAS stated COLLINS would send UCE-2 the press releases to be used for the promotion the following day. UCE-2 told THOMAS, once the news was received, UCE-2 would wire THOMAS the money for the GBEN shares. THOMAS arranged for a friend to bring \$50,000 in volume that day in GBEN and called a “buddy” and asked if he could bring some “heat.” THOMAS asked UCE-2 at what price UCE-2 thought GBEN would trade “hot and heavy”, and stated his (THOMAS) goal was to make \$2,000,000 or \$3,000,000 million on GBEN.

36. On or about May 1, 2020, UCE-1, and UCE-2 received an e-mail from THOMAS, e-mail address: RRR\_MATEY@protonmail.com. The e-mail stated, “he just sent you some PR.” On May 1, 2020, UCE-1, and UCE-2 received an e-mail from COLLINS, e-mail address: RRR\_MATEY@protonmail.com. The e-mail contained two draft press releases that could be publicly released for GBEN. The press releases related to GBEN’s product run with new labels, and the expansion into direct to consumer shipping. Between May 4, 2020, and May

11, 2020, UCE-1, and UCE-2 received several emails from either THOMAS or COLLINS which contained draft press releases that could be released for GBEN. THOMAS informed UCE-1 that the RRR\_MATEY@protonmail.com was an e-mail address used by both THOMAS and COLLINS.

37. On or about May 16, 2020, UCE-1 received an e-mail from THOMAS, utilizing the e-mail address THEPATRICKRAY@protonmail.com. The e-mail contained account statements from the transfer agent for UCE-3, and Gulf Coast M&A LTD, which showed 500,000 unrestricted shares of GBEN purchased from THOMAS. The account statement for Gulf Coast M&A LTD showed an address of Abraham Gonzalez, 83 #403 CP, Mexico City, Mexico.

38. On or about May 20, 2020, UCE-1 had series of consensually recorded interstate telephone conversation with THOMAS who informed UCE-1 that THOMAS was ready for the promotion to begin. THOMAS informed UCE-1 that THOMAS would take down GBEN's share price to wherever it needed to be liquid. THOMAS informed UCE-1 that Gulf Coast M&A LTD account was THOMAS's sister-in-law who resides in Mexico. THOMAS stated COLLINS was holding off on the press releases until THOMAS and the UCEs were ready to go.

39. On or about May 28, 2020, the FBI received, via federal express, a stock certificate for 500,000 shares of GBEN in the name of UCE-3, and a transaction journal from transfer agent for the purchase of free trading shares from THOMAS.

40. On or about June 2, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS who stated COLLINS had told THOMAS that THOMAS could do more share conversions. THOMAS informed UCE-1 that THOMAS could convert between 250,000,000 and 300,000,000 shares of GBEN depending on what the UCEs wanted to do.

41. On or about June 5, 2020, the FBI sent an interstate wire transfer of \$25,000 from an FBI controlled bank account located in Del Mar, California to Wells Fargo bank account ending in x9842 in the name of Gulf Coast M&A LTD located in Sheridan, Wyoming for the purchase of 500,000 free trading shares of GBEN.

42. On or about June 24, 2020, UCE-1 had a consensually recorded conversation with THOMAS and COLLINS. Due to an administrative error during the download of the recording, there is no recording of the conversation in full. THOMAS and COLLINS informed UCE-1 that they wanted to start the GBEN stock promotion as soon as possible. THOMAS and COLLINS informed UCE-1 that they were both cash poor, but stock rich, and their financial positions were intermingled with one another, and their monies were one in the same. THOMAS and COLLINS informed UCE-1 that it did not matter what share price of GBEN share price was, because THOMAS and COLLINS had all the paper (stock) needed for the stock promotion. At this point in the conversation, UCE-2 telephonically joined the meeting. COLLINS and THOMAS reiterated they were ready for the stock promotion now and would time the press releases issued by GBEN during the promotion. COLLINS informed the UCEs that he (COLLINS) had twelve press releases ready to go and would provide them to the UCEs through THOMAS. THOMAS and COLLINS informed the UCEs that THOMAS and COLLINS would trade shares of GBEN over the course of two weeks to build the chart and create volume in advance of the promotion. UCEs agreed to send THOMAS and COLLINS \$10,000 for 250,000 shares of GBEN to be used by the promotion firm for the GBEN promotion. At this point in the conversation, UCE-2 left the meeting. THOMAS inquired if UCE-1 thought they (THOMAS, COLLINS and the UCEs) could make at least \$6,000,000 from the GBEN promotion. COLLINS responded that if they did not make \$6,000,000 then they did something wrong. THOMAS, COLLINS, and UCE-1 discussed

THOMAS' ability to convert up to 300,000,000 shares of GBEN for the promotion and even if the shares were sold at a share price of \$0.05 to \$0.08 they (THOMAS, COLLINS, and the UCEs) would make between \$15,000,000 and \$24,000,000. While COLLINS had stepped outside to talk on the telephone, THOMAS informed UCE-1 that THOMAS would take care of paying COLLINS out of THOMAS's his profits from the promotion (since COLLINS was an insider of GBEN). THOMAS informed UCE-1 that THOMAS would move to Cancun, Mexico after the GBEN promotion. At the conclusion of the conversation, THOMAS and COLLINS asked UCE-1 to get UCE-2 to start the GBEN stock promotion in four weeks or sooner.

43. On or about July 7, 2020, the FBI sent an interstate wire transfer of \$10,000 from an FBI controlled bank account located in Del Mar, California to Wells Fargo bank account ending in x9842 in the name of Gulf Coast M&A LTD located in Sheridan, Wyoming for the purchase of 250,000 free trading shares of GBEN to be used for the promotion and manipulation of GBEN in the scheme.

44. On or about July 20, 2020, UCE-2 had a consensually recorded interstate telephone conversation with THOMAS. THOMAS told UCE-2 that THOMAS had spoken to the transfer agent to issue the UCEs 500,000 and 250,000 share blocks issued prior to running the promotion. UCE-2 and THOMAS discussed COLLINS idea to promote GBEN as a "COVID" deal. THOMAS inquired if GBEN were to be marketed as a "COVID" deal, what price point would the promotion run the share price to and stated that there were only approximately 1,500,000 shares in the market not controlled by THOMAS. THOMAS told UCE-2 that THOMAS would speak with COLLINS regarding the press releases for the promotion.

45. On or about July 27, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS. UCE-1 and THOMAS discussed the timing of running



the GBEN promotion. THOMAS expressed his (THOMAS) desire to make as much money as possible on the promotion. THOMAS stated he (THOMAS) and COLLINS had approximately 2,500,000 to 3,000,000 million shares on deposit. UCE-1 and THOMAS discussed postponing the promotion back one week and once the promotion was run, THOMAS and the UCEs would reload with shares and continue to run promotions every two weeks.

46. On or about August 4, 2020, UCE-1 had a consensually recorded interstate telephone conversation with THOMAS. UCE-1 and THOMAS discussed challenges getting stock from the transfer agent in advance of promotion. THOMAS told UCE-1 that COLLINS was working on closing the acquisition with the health company which would make GBEN a COVID-19 related deal. THOMAS stated he (THOMAS) would speak to COLLINS about getting the press releases to the UCEs for GBEN in advance of the promotion.

47. On or about August 11, 2020, UCE-1 had a consensually recorded interstate telephone conversation with COLLINS. COLLINS told UCE-1 that COLLINS would send the press releases for the promotion within 24 hours. COLLINS confirmed he (COLLINS) would release news in conjunction with the promotion the following week.

48. Based on my training, experience, and discussions with other law enforcement agents, between March 6, 2020 and August 11, 2020, THOMAS and COLLINS conspired with UCE-1 and UCE-2 to run a pump and dump scheme related to the publicly traded company GBEN in violation of 18 U.S.C. § 371.

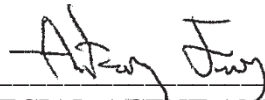
### **CONCLUSION**

49. Based on the totality of the facts and circumstances set forth herein, and based upon my training and experience, there is probable cause to believe, and I do believe, THOMAS COLLINS, and PATRICK THOMAS engaged in a scheme or artifice to defraud in violation of

Title 15, United States Code, Sections 78j(b), 78ff; Title 17, Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Section 371. Accordingly, I respectfully request that the Court issue a Federal Criminal Complaint authorizing the arrests of THOMAS COLLINS, and PATRICK THOMAS.

**REQUEST TO SEAL THIS AFFIDAVIT**

50. Finally, in my judgement and based on my training and experience, as well as conversations with other law enforcement agents, it is my belief that the disclosure of this affidavit, at this time, will jeopardize the governments ongoing investigation, and ability to arrest THOMAS COLLINS, and PATRICK THOMAS in the Northern District of Ohio and elsewhere. Accordingly, it is requested that this affidavit and arrest warrant be sealed until further order of the Court.



SPECIAL AGENT ANTHONY FRY  
FEDERAL BUREAU OF INVESTIGATION

Subscribed and sworn to via telephone after submission by reliable electronic means (CrimRules. 4.1; 41(d)(3)) this 14th day of August, 2020



UNITED STATES MAGISTRATE JUDGE