

TJS:EDP/JSC  
F.#2014R01020

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**16M 487**

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 1956(h))

MICHAEL RIZZI, also known as "Bruce,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MYLES MAHADY, being duly sworn, deposes and states that he is a Detective with the New York City Police Department, currently assigned as a Task Force Officer to the El Dorado Task Force of Homeland Security Investigations, duly appointed according to law and acting as such.

1. In or about and between June 2012 and May 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL RIZZI, also known as "Bruce" ("RIZZI"), together with others, did knowingly and intentionally conspire to conduct one or more financial transactions in and affecting interstate and foreign commerce, to wit: checks, deposits and transfers of funds, which transactions in fact involved the proceeds of specified unlawful activity, to wit: the use of one or more facilities in interstate or foreign commerce, to wit: the Internet, access devices and telephones, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: a business enterprise involving prostitution in violation of the laws of the State of New York, in violation

of Title 18, United States Code, Section 1952(a)(3), knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and with the intent to promote the carrying on of said specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Section 1956(h))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

2. I am a Detective with the New York City Police Department ("NYPD") and am assigned as a Task Force Officer to the El Dorado Task Force of Homeland Security Investigations ("HSI"). I have been a police officer for 17 years. I have participated in the investigation and prosecution of numerous prostitution enterprises and their principals, including "in call" brothels, "out call" prostitution delivery services and "happy ending" massage parlors, for state and federal crimes including promoting prostitution, sex trafficking, money laundering, wire fraud, tax crimes, narcotics possession and sale, weapons possession, official corruption and conspiracy to commit such crimes. In the course of those investigations and prosecutions, I have analyzed financial and business records, done internet searches, and executed search warrants for premises, automobiles, email accounts, bank accounts, safe deposit boxes, computers, and cell phones. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

### **PROBABLE CAUSE**

#### **Background on Defendant Rizzi**

3. MICHAEL RIZZI, also known as "Bruce," is a retired NYPD Police Officer and the owner of BJM Consulting ("BJM") d/b/a Manhattan Stakes and Entertainment ("Manhattan Stakes"). He served in the NYPD for approximately nine years from 1991 to 2000. He retired in 2000 with a line of duty disability pension.

4. On October 21, 2009, RIZZI was arrested by the Organized Crime Investigation Division of the NYPD. RIZZI was charged by the Queens County District Attorney's office with Enterprise Corruption (NYS PL 460.20), a B felony, for his role in a sports gambling ring. The indictment charged that RIZZI acted as a "super agent" for the sports gambling ring with approximately 400 bettors placing bets with him. On November 22, 2011, RIZZI was convicted after a plea of guilty to NYS PL 225.05, promoting gambling in the 2nd degree, an A misdemeanor, and paid a monetary fine.

#### **Marc Schulman and Pure Platinum Models**

5. In and around 2012, Special Agents from HSI and the Internal Revenue Service ("IRS"), along with members of the NYPD (collectively, the "investigative agencies"), began an investigation into an escort service, Pure Platinum Models, owned and operated by Marc J. Schulman of Staten Island, New York. The investigation indicated that Schulman was using various shell companies, including Gotham Stakes and Entertainment, National Environmental Testing Services, I Got Lucky and Icon Media, among others, to

launder the money he earned through the Pure Platinum Models (“PPM”) prostitution business.

6. On October 25, 2012, the investigative agencies arrested three drivers who worked for Pure Platinum Models. Approximately a year and a half later, on July 29, 2014, Schulman was arrested and charged with violations of 18 U.S.C. § 1956 for laundering more than \$1,000,000.00 through his prostitution businesses between June 2010 and July 2012. See United States v. Schulman, 14-CR-415 (ERK). Schulman subsequently entered a guilty plea and, on October 9, 2015, was sentenced by the Hon. Edward R. Korman to one year and one day of imprisonment.

7. The investigation into Schulman’s activities continued after his arrest and guilty plea. As the investigation continued, the investigative agencies uncovered a number of connections between Schulman’s prostitution businesses and BJM, a company owned by RIZZI. I know that RIZZI owns BJM because bank records, credit card records, and Paychex records, GoDaddy.com records and W-2 forms, among other records, all list RIZZI as the “owner” of BJM or primary contact for BJM. Those records also contain RIZZI’s personal contact information, including addresses for buildings he owns as well as his phone numbers and email addresses. The evidence collected by the investigative agencies, summarized in part below, indicated that on or about June 2012—approximately four months before Schulman’s drivers were arrested—RIZZI had begun conducting the same prostitution-related business as had Schulman. These connections include the following:

a. BJM Used the Same Physical Address as Schulman’s Companies:

Until January 2016, BJM had an office located at 466 Wild

Avenue, Staten Island, NY. 466 Wild Avenue is part of a strip of

commercial spaces owned by HL Land Corp. A directory sign posted at the entrance to the location stated “466 Wild Avenue Plaza” and listed BJM as an occupant. Observations at the location identified a mail box mounted outside the location with the letters “BJM” clearly displayed. On September 18, 2015, the investigative agencies confirmed with Con Edison that BJM had been the customer at the location since June 2012. Prior to BJM, from December 2011 to June 2012, the Con Edison customer of record at the location was Icon Media, which the investigation into Schulman revealed to be a shell company for Schulman’s company, Pure Platinum Models. A review of Icon Media’s bank account records revealed that during the same time period that Icon Media was the Con Edison customer of record, Icon Media issued rent checks to the property owner, HL Land Corp., with notations such as “Security 466 Wild” and “rent” in the memo section of the checks. A similar review of BJM’s checking account records indicates that from June 2012 to May 2014, BJM made approximately 23 rent payments to HL Land Corp for the same property as Icon Media. A review of the checking account records associated with Manhattan Stakes, the D/B/A of BJM, indicates that from June 2014 to March 2015, Manhattan Stakes made seven rent payments (including several double payments) to HL Land Corp. The Manhattan Stakes checks also bear notations such as

“Rent” in the memo sections of the checks. 466 Wild is no longer in operation; it was vacated in January 2016.

- b. BJM Made Direct Payments to Schulman Companies: In June 2012, BJM issued three checks totaling \$10,000 to Icon Media. Between November 2012 and February 2013, BJM issued monthly checks totaling \$22,000 to the bank account of I Got Lucky (a shell company controlled by Schulman). Each of these seven checks issued by BJM to Icon Media and I Got Lucky contained memos noting that they were in payment for website related work, “SEO,” “SEO Services” or “SEO Marketing.” “SEO Services” stands for Search Optimization Services and relates to the process of maximizing the number of visitors to a particular website by ensuring that the site appears high on the list of results returned by a search engine.
- c. RIZZI and BJM Paid GoDaddy.com Website Registration Fees Previously Paid by Schulman Companies: During the investigation into Schulman’s criminal activity, the investigative agencies located routine checks paid from Schulman’s Icon Media company to GoDaddy.com—a website registration company—for website registration fees connected with escort advertising websites maintained by Schulman. In June 2012, a payment was made to GoDaddy.com from RIZZI’s personal bank account to maintain

the websites registered under shopper ID number 13887245,<sup>2</sup> previously used by Schulman, including janeblow.com, iconcompanions.com, getsweetlucy.com, and valleyyum.com. Those websites had been registered to Schulman's account and had previously been paid for by Icon Media. In the months and years that that followed, the payments from Icon Media to GoDaddy.com ceased, and many of Shulman's websites expired and ceased to exist, but payments for the remaining few websites registered by Schulman, including janeblow.com and iconcompanions.com continued to be made from RIZZI's personal bank account, BJM accounts and the Manhattan Stakes Account. GoDaddy.com records identify RIZZI as the current account holder for Schulman's old shopper ID number, 13887245. As of January 2013, using the same shopper ID number, RIZZI has registered dozens of additional websites with GoDaddy.com, in an apparent effort to promote his prostitution business, as detailed below. As outlined below, RIZZI has also created and registered websites under a second GoDaddy.com shopper ID number. Payments for these new websites are still ongoing.

- d. BJM Employs Past Employees of Schulman Companies: BJM uses the automated payroll system Paychex to pay certain employees.

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<sup>2</sup> A shopper ID is a unique number assigned to anyone registering websites with GoDaddy.com.

BJM's account lists five employees: RIZZI himself, Client Doe 1, Jane Doe 1, Jane Doe 2, Jane Doe 3 and Jane Doe 4. Both Jane Doe 1 and Jane Doe 2 were identified in the Schulman investigation as employees of Pure Platinum Models who work as phone bookers—the individuals who set up appointments and dispatch the prostitutes. In my experience in investigations into high-end prostitution services, phone bookers are usually paid both a base salary and a commission. I have reviewed records obtained from Paychex that show payments made by BJM to Jane Does 1 and 2. The payments made to them are consistent with the salary structure found in high-end prostitution services and often include memo descriptions containing the word "Comm," which I believe is an abbreviation for the word "Commission."

- e. RIZZI Employs Prostitutes Who Worked for Schulman: During the investigation into Schulman's prostitution enterprise, the investigative agencies interviewed several prostitutes who worked for Pure Platinum Models. Included among these prostitutes were Escort 1, Escort 2, and Escort 3, each of whom worked for Pure Platinum Models prior to June 2012—the date that RIZZI appears to have taken over Schulman's operations. Two of the women admitted they had sexual relations with their clients, while a third, Escort 3, denied any sexual conduct. The investigative agencies have reviewed the bank account records for all three women: in the



months and years following June 2012, all three continued to receive checks from BJM and/or Manhattan Stakes—the companies run by RIZZI.

8. In addition to the connections between BJM and Schulman's prior prostitution enterprise, other evidence developed in the investigation shows that RIZZI continues to operate a prostitution enterprise.

#### **RIZZI's Prostitution Websites**

9. Based on a review of GoDaddy.com records, RIZZI is the named registrant of over 80 websites, not identified above, under two GoDaddy.com shopper IDs. Specifically, MICHAEL RIZZI is the registrant for 58 websites that are currently active, including: janeblow.com, nycescortsnyc.com, pincubine.com, alluringcompanions.com, lushplaymates.com, plushplaymates.com, lusciouscompanions.com, iconcompanionsnyc.com, pureplaymates.com, perfect10club.com, flygirlsnyc.com and eliteescortsnyc.com. A full list of the active websites is attached as Appendix A.

10. For each of these websites, GoDaddy.com records show the registrant as MICHAEL RIZZI, under company name "Manhattan Stakes & Entertainment." They also list RIZZI's cellular telephone number, an email address associated with RIZZI and a street address for a property owned by RIZZI.

11. In previous investigations, I have encountered prostitution businesses that promote themselves under several different websites with multiple different telephone numbers in order to capture a greater share of the market for illegal prostitution. The websites registered to RIZZI share content, language and information, giving the appearance that they were all set up by the same person and/or entity. Each of the websites have photographs of

approximately 25-30 women listed under the “Model” tab, dressed in scantily clad outfits such as lingerie or bikinis, or occasionally topless. Each picture has the woman’s name associated with it and a “donation” price listed. The websites advertise primarily the same women with the exact same photos. Additionally, each of the websites has a “VIP Model” tab; the exact same women are listed in the “VIP Tab” on RIZZI’s atlanticcitymodels.com, eliteescortsphiladelphia.com, alistcompanions.com, eliteescortsatlanta.com, pureplaymates.com, executiveescorts.com and perfect10club.com websites.

### **Hiring Escorts and Booking Escort Services**

12. I have learned through the course of the investigation, by reviewing BJM-related correspondence and records that RIZZI uses the email account modelsofnyc@yahoo.com in connection with his prostitution enterprise. A search warrant return for that account reveals that the affiliated tag name is “Stephenie Smith,” but the emails are often signed by either “Bruce” or “Mike” or “Michael Rizzi.” During the course of the investigation, I have come to learn that RIZZI uses “Bruce” as an alternative name in BJM related correspondence.

13. RIZZI accepts applications from escorts using his modelsofnyc@yahoo.com account. Women complete a form outlining their name, ethnic origin, height, weight, measurements, hair color, languages spoken, whether they can travel, and their “character” / “personality,” and “escort name.” Women submitting these forms have included the following entries:

- a. “I am a fun loving girl who loves sex. I have always dreamed of being in the escort business (weird, but true) everything about the business turns me on. I want it. I love sex and if I can get paid for it why not? It’s just sex .. and sex is FABULOUS”

- b. “full service // anal toys // strap on // bdsm // gfe”. I know “gfe” to mean the “girlfriend experience” which relates to a specific way a woman would interact with a date, either in demeanor or sexually or both.
- c. “Interests = I like to party, read, travel and I absolutely love eating!!! Oral sex ROCKS!!!”
- d. “I have . . . perky titties and a nice firm butt...” “interests = Roleplay, Foreplay, S&M, and oral Sex.”

14. Some of the submissions include links to the applicants’ “TER” reviews, which I know to be erotic reviews on [www.theeroticreview.com](http://www.theeroticreview.com). Based on my experience, I am aware that [www.theeroticreview.com](http://www.theeroticreview.com) is a website where individuals post reviews of prostitutes. I have reviewed the links included in applications to RIZZI and many include explicit description of sexual activity. Some of the application submissions also include topless photos and photos of the women in sexual poses.

15. In the course of the investigation, I have interviewed girls who worked for RIZZI. I have also learned from those interviews and from my review of the [modelsofNYC@yahoo.com](mailto:modelsofNYC@yahoo.com) account that RIZZI conducts face to face meetings at hotels on particular nights, and instructs applicants he is interested in attending those meetings. One particular applicant, [69sugarbaby@gmail.com](mailto:69sugarbaby@gmail.com), did not wish to meet for the interview.

“Bruce” replied:

I’m sorry darling, google “escorts in nyc” im number one for a reason . . I get the most business, my girls make the most money, my clients are the wealthiest people in the world. I will never send a model I haven’t interviewed to them. My models are perfect because I only hire the best. My agency only does things the right way. You are very beautiful and I can work with you, especially if you look like your photos. But we must do things right and my way is right trust me. You will be handling cash and credit card receipts I need to know who I am working with like any other girls I hire. Been doing this 10 years never a problem.

16. I learned from speaking with Escort 4 and Escort 5 that RIZZI interviewed each of them in person. Escort 4 told me that RIZZI used the name “Bruce” and she identified his photograph. Escorts 4 and 5 stated that they knew that they were interviewing to be prostitutes and believed that was clear. At the interviews, RIZZI commented to Escorts 4 and 5 that they could decide what sexual acts to engage in with clients. Neither Escort 4 nor 5 believed she was a non-sexual “time companion” when working for RIZZI. At the end of Escort 4’s interview, RIZZI gave her blank credit card slips to use in accepting payment from clients.

17. I learned from reviewing the [modelsofnyc@yahoo.com](mailto:modelsofnyc@yahoo.com) records that men seeking to hire one of RIZZI’s prostitutes also may submit a form or an email to that account. One client requested a 5 day appointment, seeking an escort for a trip to Jamaica on a private jet, to stay in a private “secluded” resort. The client requested “Jade to come the night before departure . . . so we can get to know each other.”

18. Another client emailed requesting pricing “on a dinner date and on an overnight as it would apply to Kayla.” The client was provided with prices—\$600 per hour, as the bare minimum rate; a 12 hour appointment (6 pm to 6 am) for \$7200 or a 14 hour appointment (6 pm to 8 am) for \$8400. The client requested an 8 hour appointment at the Park Central Hotel, saying he would provide the room number upon arrival and specifying that payment would be in cash. “Bruce” responded that he would wait on the room info.

19. These requests were received by RIZZI or by appointment bookers working for RIZZI, who sometimes responded by email. I have also learned from reviewing records from [tollfreeforwarding.com](http://tollfreeforwarding.com) that clients also called to set up appointments with RIZZI’s prostitutes. The websites maintained by RIZZI provide phone number contact

information. RIZZI has dozens of phone lines forwarded by tollfreeforwarding.com to central booking phone lines. Those lines were operated by RIZZI himself as well as Jane Does 1, 2, and 3. I learned that the bookers completed forms that included the information for each booking—several such forms were contained in the modelsofnyc@yahoo.com account. For example, one form contained the following information:

- a. “Phone Operator: Mike”
- b. “Entertainer: Natalie @ Jordan”
- c. The client name and location, Mandarin Oriental hotel with the room number
- d. The client’s verified credit card information and signatures by the client

20. I learned from my interviews with Escorts 4 and 5 that upon receiving a booking request from a client, the bookers contacted one of the prostitutes working for RIZZI that night. Escort 4 informed me that on a night she was working, she would inform the bookers that she was available. During the course of the night, the bookers would notify Escort 4 that there was a job for her, and provided her with the details of where to go as well as payment information. Escort 5, who worked for RIZZI into 2015, explained the same process of being texted by bookers about jobs. She said the bookers would inform her of where to go, what the client’s name was and what name she should use with the client. I also learned from interviews that clients often requested specific girls that they saw on one of RIZZI’s websites, and so the bookers would find a close match and tell the escort to use the name matching the website advertisement.

21. Cell phone records collected during the course of the investigation from Escort 6 contained text exchanges between the bookers and/or RIZZI and the escort. Specifically, Escort 6 had text messages with a contact she labeled as “Bruce Icon”— who I believe to be RIZZI, given that he often used the name Bruce (in emails and to many of the escorts) and because “Icon Companions” was one of the websites RIZZI advertised with. The messages directed the escort to an address, and provided the name of the client and the expected payment method.

22. RIZZI also used the [modelsofnyc@yahoo.com](mailto:modelsofnyc@yahoo.com) account to inform girls of client bookings. “Bruce” emailed one woman who was working for him, asking: “Will you be accepting incalls at your hotel? Please give me your room number at the Affinia so I can contact you there if any jobs come over. . . . Also what is your minimum per hour.” In my training and experience, I know “incalls” to refer to prostitutes conducting paid sexual activity in one location to which clients come. By contrast, in an “outcall,” a prostitute would go to the client’s location. “Bruce Icon” also exchanged text messages with Escort 6 referring to an “incall.”

23. I have also conducted interviews of clients who have hired prostitutes through RIZZI’s operation. Client 1 has spent tens of thousands of dollars on “outcalls” with one of RIZZI’s top-earning prostitutes. He used the information listed for the “Icon Companions,” one of the predecessor PPM companies that has merged into RIZZI’s operation (and one of the website domains that RIZZI has registered to him with GoDaddy.com). He used the phone number associated with Icon Companions (which was forwarded to one of RIZZI’s central lines) to hire escorts several times. He knew he was hiring prostitutes for

sexual services; he did not call seeking non-sexual company. He called to hire individual escorts for just himself and he also hired several escorts for himself and friends.

#### **Payments for Services**

24. I have learned through my interviews and by a review of financial records, including bank records, credit card records and EMS records that clients paid RIZZI's prostitutes with cash or credit cards. I have learned through a review of the [modelsofnyc@yahoo.com](mailto:modelsofnyc@yahoo.com) email account, interviews I have conducted, and financial transaction records that RIZZI's prostitutes typically charged a rate somewhere between \$400 and \$2,000 per hour. The email account and interviews also revealed that if a client paid with a credit card, RIZZI required the girls to take an imprint of the client's credit card using the payment slips he provided; they also included the date, total amount billed, and an authorization code. RIZZI and the bookers provided specific authorization codes for each credit card transaction. Escort 4 recalled being instructed to send a photo of the client's ID and credit card by email or text to the phone bookers. She recalled using the [modelsofnyc@yahoo.com](mailto:modelsofnyc@yahoo.com) account to submit payment information. She also recalled filling out the credit card payment slips that RIZZI had provided her and submitting those slips to RIZZI or his associates.

25. There are several submissions of client payment packages in the [modelsofnyc@yahoo.com](mailto:modelsofnyc@yahoo.com) account. One email contains screenshots of photos sent by one of the escorts: a photo of the completed payment slip, the client's photo ID, and the front and back of the client's credit card. The email was titled with the name of the client and two escort names.

26. I learned from my interviews with the escorts and from GPS and other surveillance that, at the end of a date, RIZZI or one of his associates would drive to the prostitution location and pick up the credit card slips. Likewise, if a client paid with cash, that would also be picked up at the end of the date. Escort 4 stated that RIZZI picked up cash or credit slips from her after one of her dates. She stated that typically, another driver working for RIZZI would come to get the cash or credit card slips from her after appointments.

27. In one text message exchange between Bruce Icon and one of his prostitutes, it is apparent that Bruce Icon drove the girl to a date with a client. Bruce Icon then sent the escort an authorization code to bill a client for "5 hours." The escort responded that she will send "photos" (which, in context, is a reference to photographs of the client's credit card and ID) after dinner. Later that night, the escort texted Bruce Icon stating she would be staying for another three hours; Bruce Icon responded with new authorization information. The next morning, Bruce Icon texted to the escort: "Great work last night."

28. Escort 4 explained to me that she understood services billed to a credit card would be billed as "BJM" and if she was asked about billing by the clients, she would explain that the billing would come up as the generic company name.

29. I learned from my interview with Client 1 and review of corresponding financial records that Client 1 typically paid with his credit card. Client 1 told me that on one occasion, he and two friends hired three of RIZZI's employees for \$25,000 – that price included sex and/or oral sex and cocaine that the girls provided, which they all collectively consumed. Client 1's normal practice was to provide his credit card and ID to the escort he hired.



30. In my experience in prostitution and money laundering investigations, I have found that the profits of an internet-based prostitution business are directly linked to its ability to accept and process credit cards. In my experience, upward of 60% of revenue for such businesses are derived from credit cards. RIZZI held an account with Electronic Merchant Systems (EMS) and he used EMS to process credit card payments garnered through his prostitution enterprise.

31. The EMS documents associated with RIZZI's account included a copy of the application submitted by RIZZI to obtain credit card processing services for Visas, MasterCard, and Discover Cards. His account application, which is dated October 4, 2012, includes the following information:

- a. The corresponding company is listed as "BJM Consulting LLC," doing business as "Manhattan Stakes & Entertainment," at 79 Lafayette Avenue.
- b. The corresponding telephone number is 212-252-2231 – a number previously used by one of Schulman's companies.
- c. RIZZI is listed as the contact person, and the email account is listed as modelsofNYC@yahoo.com.
- d. The web address listed for the company is [www.solidgoldcompanions.com](http://www.solidgoldcompanions.com) for which RIZZI is the account holder, according to GoDaddy.com records.
- e. Under the caption of "merchant profile," the type of goods sold is described as "companion."
- f. Under the caption titled "Credit Card Transaction Profile," the application states that the business is 100% internet and that all sales will be keyed into the point of sale terminal.

32. To date, EMS records revealed that RIZZI has processed over \$2 million in client credit card transactions. Bank records confirm that many of these transactions are for repeat clients, some of whom have paid over \$100,000 for BJM services. According to the EMS and bank records, several clients have spent over \$10,000 on a single night; at least one

has spent over \$20,000 on a single night.

**Use of Funds in Furtherance of the Crime**

33. RIZZI maintains several TD Bank accounts, including a BJM account #XXXXXXX4596 (the "4596 Account") and a BJM/Manhattan Stakes account #XXXXXXX8381 (the "8381 Account"). Michael RIZZI also maintains two TD Bank accounts described as personal accounts: checking account # XXXXXX0104 (the "0104 Account") and savings account #XXXXXXX6746 (the "6746 Account"). I have conducted a review of TD bank subpoena returns.

34. I have learned through a review of the financial records, including bank and credit card records, as well as reviews of Paychex, GoDaddy.com, tollfreeforwarding.com and the [modelsofnyc@yahoo.com](mailto:modelsofnyc@yahoo.com) account that RIZZI used his business and personal accounts to promote his prostitution enterprise with payments for the following: BJM employee salaries, including Jane Does 1 and 2 for their phone booking services; GoDaddy.com website registration fees; website promotion services; toll-free call forwarding services; car payments and other mechanisms for promotion and operation of BJM. I have conducted a financial analysis of the aforementioned records to review payments RIZZI made from approximately January 2009 until approximately March 2016.

35. In my review of bank and Paychex records I learned that RIZZI has a Paychex account for BJM, which lists its employees: RIZZI himself, Client Doe 1, and Jane Does 1 through 4. Starting in around December 2013 to January 2014, RIZZI used the 4596 Account to submit checks to Jane Doe 1 and Jane Doe 2, as well as Client Doe 1 and to RIZZI himself. Additionally, by the end of 2014, RIZZI began using the 8381 Account to remit payments to Jane Does 1, 2 and 3 as well as Client Doe 1 and RIZZI himself. Frequently,

RIZZI made payments from “Manhattan Stakes Entertainment” to the 8381 Account or similar cross-business transactions between various BJM accounts or checks. In total, RIZZI’s BJM accounts have disbursed almost \$200,000 via Paychex to the BJM employees.

36. In my review of the bank records as well as tollfreeforwarding.com records and other business correspondence, I learned that BJM Consulting also has retained the services of tollfreeforwarding.com, which forwards the phone numbers listed on various of RIZZI’s websites (such as Pure Playmates, Perfect 10 Club, All American Models, Icon Companions) to central destination numbers, belonging to RIZZI, BJM Consulting and the Jane Does. In total, RIZZI’s BJM accounts have disbursed almost \$25,000 to tollfreeforwarding.com for this service

37. As outlined above, RIZZI has two GoDaddy.com shopper ID accounts through which he has registered over 80 websites pertaining to his prostitution enterprise. In total, RIZZI’s BJM accounts have disbursed almost \$10,000 to GoDaddy.com. I also know from reviewing RIZZI’s email account, modelsofnyc@yahoo.com, that he has retained and paid website promotion services to attract more web traffic on his numerous escort advertisement pages.

38. As discussed above, RIZZI processed client payments using EMS; to date BJM accounts have disbursed over \$112,000 to EMS, for EMS’s processing of over \$2 million in credit card transactions for BJM.

39. RIZZI additionally drives a black 2016 Infiniti; according to GPS data and surveillance in the past two months, he has used the car to make TD bank deposits or withdrawals, to drive around escorts, and to travel to and from the BJM business addresses. RIZZI makes car payments using BJM’s accounts, which total over \$7,000. BJM accounts have also made payments to Ford, Land Rover, Lexus and Toyota, for a total of over \$75,000

in disbursements. Escorts I have interviewed have told me that drivers employed by Schulman pick up payment slips from them or assist taking them to and from dates. I also know from the Schulman investigation that Schulman employed several drivers for this purpose. Accordingly, I believe that some or all of the cars BJM pays for are used by various BJM employees or drivers to assist in taking prostitutes to and from dates, picking up payment slips and conducting bank transactions.

40. In sum, RIZZI has utilized the proceeds of his prostitution enterprise to promote additional prostitution business by conducting transfers of funds in excess of hundreds of thousands of dollars.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued so that the defendant MICHAEL RIZZI may be dealt with according to law.

  
MYLES MAHADY  
Detective, New York City Police Department

Sworn to before me this

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8/KUO

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Y KUO  
TRATE JUDGE  
NEW YORK

**APPENDIX A**

**Active Domain Names Registered to MICHAEL RIZZI**

1. 855girlnyc.com
2. 855girlsny.com
3. alistcompanions.com
4. allamericanmodels.com
5. alluringcompanions.com
6. atlanticcitymodels.com
7. bachelorpartiesnyc.net
8. champagnemodels.com
9. companionsdeluxe.com
10. couplescompanions.com
11. eliteescortsatlanta.com
12. eliteescortschicago.com
13. eliteescortsla.com
14. eliteescortslasvegas.com
15. eliteescortslosangeles.com
16. elite-escortsmiami.com
17. eliteescortsnyc.com
18. eliteescortspiladelphia.com
19. elitemodelsmiami.com
20. enchantingcompanions.com
21. escortnyc1.com
22. escortnycmodels.com
23. escorts-in-nyc.com
24. escortsnewyork.net
25. escortsny.net
26. escortsupermodelsnyc.com
27. executiveescortsnyc.com
28. flygirlsny.com
29. getsweetlucy.com
30. heavenlycompanions.com
31. hotmodelsnyc.com
32. iconcompanions.com
33. iconcompanionsnyc.com
34. janeblow.com
35. lovelycompanions.com
36. lusciouscompanions.com
37. lushplaymates.com
38. majesticmodelsnyc.com
39. manhattanpromoservice.com
40. manhattansupermodels.com
41. nycdreamgirls.com

42. nycescort1.com
43. nycescortsnyc.com
44. nypoo.com
45. perfect10club.com
46. pincubine.com
47. plushplaymates.com
48. poodenda.com
49. pureplaymates.com
50. selectmodelsnyc.com
51. shamelessmodels.com
52. solidgoldmodels.com
53. sublimecompanions.com
54. superbcompanions.com
55. supermodelsnyc.com
56. theescortapp.com
57. vip-escorts-nyc.com
58. world-classmodels.com

TO: Clerk's Office  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

\*\*\*\*\*  
UNITED STATES

-v.-  
MICHAEL RIZZI, aka "Bruce"  
\*\*\*\*\*  
16M487  
Docket Number

\*\*\*\*\*

SUBMITTED BY: Plaintiff Defendant DOJ   
Name: Jennifer Carapiet  
Firm Name: USAO EDNY  
Address: 271 Cadman Plaza E

Phone Number: 718 254 6402  
E-Mail Address: jennifer.carapiet@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES  NO   
If yes, state description of document to be entered on docket sheet:



A) If pursuant to a prior Court Order:  
Docket Number of Case in Which Entered: \_\_\_\_\_  
Judge/Magistrate Judge: \_\_\_\_\_  
Date Entered: \_\_\_\_\_

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
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THE COURT.

DATE: 5/20/16 NEW YORK  
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DATE: \_\_\_\_\_  
RECEIVED BY: \_\_\_\_\_ CLERK OF COURT

MANDATORY CERTIFICATION OF SERVICE:

A.) A copy of this application either has been or will be promptly served upon all parties to the following other statute or regulation: \_\_\_\_\_; or C.) This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

DATE \_\_\_\_\_ SIGNATURE \_\_\_\_\_