

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BMADDOX ENTERPRISES LLC,)
)
 Plaintiff,)
)
 v.)
)
 MILAD OSKOUIE, OSKO M LTD, and)
 PLATINUM AVENUE HOLDINGS PTY, LTD,)
)
 Defendants.)

Case No.: 17-cv-1889-RA-HBP

MILAD OSKOUIE and PLATINUM AVENUE)
 HOLDINGS PTY, LTD,)
)
 Counterclaim Plaintiffs,)
)
 v.)
)
 BMADDOX ENTERPRISES LLC and)
 BRANDON MADDOX,)
)
 Counterclaim Defendants.)

DECLARATION OF BRANDON MADDOX

I, Brandon Maddox, state as follows:


1. I am the owner of BMaddox Enterprises LLC (“BMaddox”).
2. I have reviewed the letters submitted with Defendant Oskouie’s April 13, 2018 Declaration, ECF No. 139, as Exhibits A and B. (ECF No. 139-1; ECF No. 139-

- 2.) I did not sign, authorize, send, or cause to be sent either letter, both of which are forgeries.
3. Upon information and belief, Defendant Oskouie created these forgeries using BMaddox letterhead that I know he has possession of or access to as evidenced in prior court filings. (Oskouie Decl. Opp'n Pl.'s Mot. Preliminary Inj. Ex. F, ECF No. 27-6.)
4. On or about September 6, 2017, my South Dakota based legal counsel received a phone call from an agent with the Federal Bureau of Investigation ("FBI") who had received a copy of the August 14, 2017 letter submitted to the Court today as Exhibit A attached to Defendant Oskouie's Declaration. (ECF No. 139-1.)
5. Repeatedly responding to FBI agents investigating false allegations against me have negatively impacted my family, business, and mental health.
6. BMaddox owns and operated eight federally licensed dealer locations in seven states. All firearm sales must go through FBI vetting for background check approval before completing any transfers. I am concerned that the many false reports filed against me by Defendant Oskouie will cause BMaddox to lose its ability to use the FBI's background check system.
7. Upon information and belief, Defendant Oskouie will not cease filing false allegations against me with my local law enforcement unless enjoined by this Court.
8. I have personal knowledge of all facts stated herein except as to those matters stated on information and belief, and, as to those matters, I believe them to be

true. If called as a witness in this action, I could and would testify competently thereto under oath.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Date: April 13, 2018

By: 
Brandon Maddox