

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

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BMADDOX ENTERPRISES LLC,)
)
Plaintiff,)
)
v.)
)
MILAD OSKOUIE, OSKO M LTD, and)
PLATINUM AVENUE HOLDINGS PTY, LTD,)
)
Defendants.)
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MILAD OSKOUIE and PLATINUM AVENUE)
HOLDINGS PTY, LTD,)
)
Counterclaim Plaintiffs,)
)
v.)
)
BMADDOX ENTERPRISES LLC and)
BRANDON MADDOX,)
)
Counterclaim Defendants.)
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Case No. 17-cv-1889-RA-HBP

DECLARATION OF BRANDON MADDOX

I, Brandon Maddox, state as follows:

1. I am the owner of BMaddox Enterprises LLC (“BMaddox”).
2. Beginning on or around January 4th 2017 I began receiving communications from Federal Bureau of Investigation (“FBI”) agents alerting me that a person identifying himself as Milad Oskouie had submitted information to the FBI claiming that I had done several things that I had not done, including the incidents described in the following paragraphs.


3. An individual identifying himself as Milad Oskouie has repeatedly submitted false reports to the FBI, and although the FBI's investigations into Oskouie's fabricated claims have not led to any charges, they have caused my loved ones and I a considerable amount of grief and anxiety.
4. An agent, based in the Sioux Falls, South Dakota FBI Internet Crimes Division, has been my point of contact since I originally reported the intrusion into several of my online accounts as described in the current civil case. I was referred to this agent by the South Dakota Division of Criminal Investigation (DCI) and Bureau of Alcohol Tobacco Firearms & Explosives (BATFE).
5. This agent has informed me that threats made to the FBI must be investigated. As a direct result of false reports filed by a person identifying himself as Milad Oskouie, the agent has called me so many times that I had to request that the FBI only communicate with my South Dakota attorney directly.
6. The agent has, at various times, informed me that I had been accused of: telling Oskouie I wanted to kill him; telling Oskouie I wanted to shoot him through the head with a high-powered rifle; telling Oskouie I would put him in an oven and bake him; and sending Oskouie letters written in blood saying I wanted him dead. Other accusations reported to the FBI have claimed that I made odd threats to Oskouie for unclear reasons having something to do with at least two religious faiths. None of these disturbing accusations are true.
7. No evidence has ever been produced to support these accusations.
8. The FBI contacted my South Dakota attorney on September 6, 2017 regarding a letter I reportedly sent to Milad Oskouie's parents dated August 17, 2017 making

several specific threats. I did not send this letter, but the FBI reported that it appears on my letterhead.

9. The FBI is in possession of a forged letter provided to them by Milad Oskouie on my letterhead. I called my contact at the FBI directly and confirmed this is a forged letter that I never sent.
10. A FOIA request has been submitted to FBI to get a full disclosure of all these bizarre accusations made by Milad Oskouie against me to the FBI.
11. Milad Oskouie has also called the Sioux Falls South Dakota Police Department to level fabricated accusations at me.
12. Milad Oskouie has called my businesses multiple times trying to disrupt them.
13. Milad Oskouie has called a loved one multiple times on that person's unlisted cell phone.
14. Milad Oskouie called my personal cell phone so frequently that I changed my number.
15. Milad Oskouie's continuous harassment of me and my loved ones, particularly his false accusations made to law enforcement officers, have cause my family and I to fear for our safety.

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

Date: September 7, 2017

By: 
Brandon Maddox