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June 17, 2019

BY ECF AND HAND DELIVERY

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Konstantin Ignatov, S7 17 CR 630 (ER)

Dear Judge Ramos:

A. INTRODUCTION

Defendant Konstantin Ignatov respectfully submits this Letter in support of his motion for bail pending trial. Despite his status as a foreign national of Germany, it is respectfully submitted that Mr. Ignatov is eminently bailable, and the government cannot overcome their burden of demonstrating that no “conditions” exist which will “reasonably assure” his “appearance” in court and the “safety” of the “community,” (see 18 U.S.C. § 3142 (f)) particularly in light of the restrictive conditions of release that we propose today, which include the use of 24 hour armed security guards, GPS location monitoring, and \$10M in cash and properties securing a \$20M personal recognizance bond.

First, Mr. Ignatov poses no credible risk of flight. While he is not a citizen of the United States, he willingly came to this country knowing that an investigation into OneCoin was in progress: as the Court is aware, OneCoin executive and now co-defendant, Mark Scott, had already been charged with money laundering in the Southern District of New York six months prior in 2018 by the time Mr. Ignatov arrived in March of this year. Further, when he was questioned upon his entry into the country and his phone and laptop were searched, Mr. Ignatov did not seek to flee. Instead, he was apprehended approximately one week later at the airport after he concluded his trip to the United States. This behavior is simply not indicative of an individual who plans to abscond in the face of pending criminal charges.

Second, it cannot be credibly argued that the defendant poses a risk of danger to the community. While Mr. Ignatov is an accomplished mixed martial arts competitor, he has no criminal record and, indeed, there is no violence or weapons associated with this case. Instead,

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the Superseding Information charges a single count of wire fraud, wherein the defendant is alleged to have made misrepresentations which caused individuals to invest in the OneCoin cryptocurrency. See S7 Superseding Information. Additionally, the proffered bail conditions will ensure that Mr. Ignatov have no contact with any OneCoin business.

Third, the conditions of pretrial release that we propose ameliorate any fears that Mr. Ignatov is either a flight risk or danger to the community. He would be released via a \$20M personal recognizance bond, secured by \$10M in cash and property put up by persons who have placed their unwavering trust in the fact that Mr. Ignatov will remain to face these charges. He would pay for 24 hour armed guards at an apartment to be leased in this district and shared with his pregnant girlfriend, Kristina, who is also an attorney – ensuring that he does not flee. The security agency would be chosen with the agreement of the government. Only preauthorized individuals would be permitted inside the residence, Mr. Ignatov would agree not to use cellphones, and he would not use a computer for any purpose other than the review of discovery and note taking. Additionally, his location would be monitored via a GPS bracelet, and he would permit the government to search his residence at any time to ensure compliance with the conditions of his release.

Finally, Mr. Ignatov is at least as bailable – if not a better candidate for release – than other non-citizen defendants facing major fraud prosecutions who have recently been granted bail in the Eastern and Southern Districts of New York – even without the use of self-funded armed security guards preventing their flight. See, e.g., United States v. Nejad, 18 CR 224 (ALC) (S.D.N.Y.) (Iranian national alleged to have funneled \$115M from the United States to Iranian entities and individuals); United States v. Ng, 18 CR. 538 (MKB) (E.D.N.Y.) (Malaysian national extradited to the United States alleged to have participated in a scheme to embezzle some \$2.7B). The conditions of release that we propose are far more rigorous than that demanded of either Messrs. Nejad or Ng, who similarly faced large white collar prosecutions, and as such, Mr. Ignatov should also be freed pending trial.

B. SUMMARY OF THE CHARGES

Mr. Ignatov is charged in a one count Superseding Information (S7) with Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1343. While the Superseding Information is silent as to many of the details, it generally alleges that from 2014 through 2019, Mr. Ignatov and others “made and caused to be made false statements and misrepresentations soliciting individuals ... to invest in ‘OneCoin,’ a purported cryptocurrency, and instructed individuals to transmit investment funds to OneCoin depository accounts in order to purchase OneCoin packages.” S7 Superseding Information, at p. 2.

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The March 2019 Complaint (the “Complaint”) alleges much more detail as to the charged conspiracy. Specifically, the Complaint alleges that Mr. Ignatov’s elder sibling and co-defendant, Raja Ignatova, was the founder of OneCoin, which markets a cryptocurrency by the same name. The Complaint further alleges that Mr. Ignatov was initially Raja’s personal assistant, then functioned as a “high-level executive” for OneCoin starting in December 2017, and appeared as a “promoter and spokesperson” for the company at “events world wide.” Complaint at p. 3. The Complaint further alleges that Mr. Ignatov took over for his sister in mid-2018 in its top leadership position when she “disappeared from public view.” *Id.* at pp. 3, 17. At base, the government alleges that OneCoin was “conceived by Ruja [Ignatova] to defraud investors,” and that OneCoin’s “public representations” which caused individuals to invest were false and misleading, including claims that the cryptocurrency is “mined,” and that its value is set by “supply and demand.” *Id.* at p. 7.

C. THE PROPOSED BAIL PACKAGE

At his March 27, 2019 initial appearance before Magistrate Judge Parker, Mr. Ignatov was unprepared to present a bail package to the Court, and accordingly, he was detained without prejudice to make a bail application in the future. With this application, Mr. Ignatov proposes that Your Honor adopt the following package, which while not “excessive” (U.S. Constitution amend. VIII) will “reasonably assure the appearance of [the defendant] as required.” See United States v. Sabhnani, 493 F.3d 63, 75 (2d Cir. 2007); see also United States v. Madoff, 586 F. Supp.2d 240, 249 (S.D.N.Y. 2009) (“The [Bail Reform] Act does not require that the risk be zero, but that conditions imposed reasonably assure appearance”) (internal quotation marks omitted).

The proposed bail package includes the following conditions securing the defendant’s pretrial release:

- Self-funded armed security guards stationed with the defendant 24 hours per day at a residence to be rented by him in the Southern District of New York;
- A \$20M personal recognizance bond signed by five financially responsible individuals, secured by \$1.5M in equity from the properties belonging to friends in the United States, and \$8.5M in cash;
- Strict pretrial supervision;
- GPS location monitoring;

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- Home incarceration with only visitors pre-authorized by the government permitted inside;
- No contact between Mr. Ignatov and his codefendants outside the presence of counsel;
- No contact between Mr. Ignatov and any known victims or witnesses;
- No use of the internet;
- No involvement with OneCoin business or contact with OneCoin employees;
- Surrender of Mr. Ignatov's passport and any other travel documents with no renewals;
- No use of cellular telephones by the defendant, and computer use restricted to the review of discovery and note taking for his defense; and
- Permission for the government to search the defendant's residence and to tap his telephone to ensure compliance with the conditions of his release at any time.

D. ARGUMENT

The Supreme Court has observed that “[i]n our society liberty is the norm, and detention prior to trial or without trial is the carefully limited exception.” United States v. Salerno, 481 U.S. 739, 755 (1987); see also Sabhnani, 493 F.3d at 75 (“it is only a limited group of offenders who should be denied bail pending trial”) (internal quotation marks omitted). Indeed, “[t]he Bail Reform Act carefully limits the circumstances under which detention may be sought to the most serious of crimes” (*id.* at 747) and directs the release of the defendant “subject to the least restrictive” conditions determined by the court which will “reasonably assure the appearance of the person” at trial. 18 U.S.C. § 3142(c). Further, a district court may not deny pretrial release based solely on sweeping assertions of flight risk arising from a defendant’s nationality. See Hung v. United States, 439 U.S. 1326, 1329 (1978) (granting Vietnamese national’s bail because while the inability to procure his return suggest “opportunities for flight,” it does not “establish any inclination” for such).

Here, as the government must concede, none of the § 3142(f)(1) factors that trigger the presumption of detention are met; rather, the Superseding Information charges Mr. Ignatov with wire fraud, which is no doubt aailable offense. See 18 U.S.C. § 3142(e)(2) (creating a limited class of offenses identified in § 3142(f)(1) wherein a rebuttable presumption against bail exists).

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Accordingly, the government must overcome a substantial burden in proving that Mr. Ignatov poses a “serious” flight risk or there exists a “serious” risk that he will seek to obstruct justice in his case, in order for their request for pretrial detention to be granted. 18 U.S.C. §§ 3142(f)(2)(A) and (B). Therefore, Mr. Ignatov stands before this Court as both presumptively innocent, see 18 U.S.C. § 3142(j), and presumptively eligible for pretrial release. See, e.g., United States v. Scarpa, 815 F. Supp. 88, 91 (E.D.N.Y. 1993) (pretrial detention “has been and should remain the exceptional practice”) (emphasis supplied); United States v. Berrios-Berrios, 791 F.2d 246, 250 (2d Cir. 1986) (pretrial detention is a drastic measure, narrowly reserved for “extreme case[s]”).

To rebut the latter presumption – that the defendant is eligible for pretrial release – the government must prove that there are no “conditions” which will “reasonably assure” Mr. Ignatov’s “appearance” and the “safety” of the “community.” See 18 U.S.C. § 3142 (f). As shown below, the government will be unable to meet this burden – especially in light of the restrictive conditions of release that we propose.

The Effect of Pretrial Detention on the Presumably Innocent Defendant

Before turning to a more detailed analysis of the relevant facts and legal principles involved, a few observations concerning the practical realities facing a defendant committed to pretrial detention are appropriate.

Certainly, the best exposition of the real consequences of pretrial detention is found in Judge Weinstein’s decision in United States v. Gallo, 653 F. Supp. 320, 336-339 (E.D.N.Y. 1986). There, Judge Weinstein explained that being held in pretrial detention involves far more than merely the deprivation of an individual’s liberty. Id. at 336. The obstacles and difficulties which are visited upon a defendant and his counsel, as well as their ability to effectively prepare a defense against serious criminal charges, can be almost empirically measured. Id. at 337. As Judge Weinstein noted:

[A]ll of these hardships, including deterioration of [the defendant’s] morale, demeanor, finances, resources, reputation and quality and thoroughness of legal defense, may combine to disadvantage the defendant at the judgment and sentencing stages of the proceeding. As to judgment, studies have indicated that the tension is likely to increase the chances of conviction at trial.

Id.

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In Gallo, Judge Weinstein underscored the need for a careful “balancing” by the trial court. Id. at 338. He urged his brethren to consider the detention equation beyond the perspective of quantifying the amount of information presented by the government. Id. at 338-39. Instead, he emphasized the importance of carefully weighing the less tangible – but surely deleterious – effects of pretrial detention upon an individual’s ability to effectively defend himself.

In Scarpa, another decision by Judge Weinstein, he emphasized his concern for this process, stressing that preventive detention on the basis of future dangerousness should be the “exceptional practice.” Scarpa, 815 F. Supp. at 91. As the court noted:

It is well to remember the magnitude of the injury that pre-trial detention inflicts and the departure that it marks from ordinary forms of constitutional government. Executive power to detain an individual is the hallmark of the totalitarian state. Under our Constitution the prohibition against excessive bail, the Due Process Clause of the Fifth Amendment, the presumption of innocence – indeed, the fundamental separation of powers among the legislative, the executive and the judicial branches of government – all militate against the abhorrent practice. Our historical approach eschewing detention prior to trial reflects these concerns.

Id.

As this Court is undoubtedly in a position to observe, applications for preventive detention by the United States Attorney’s Office have grown with alarming frequency. Applications seeking to hold an accused without bail have become commonplace. Although figures are unavailable, it is certainly true that there are hundreds of federal defendants presently housed at the local detention centers throughout New York State.

These issues are raised with the Court for several reasons. First, it is important that the degree of scrutiny brought to a matter as serious as the deprivation of an individual’s liberty prior to conviction does not erode because the practice itself has become more commonplace. Second, the effect of pretrial detention upon the accused’s ability to defend himself must be considered when evaluating the prosecutor’s application. Even if a prosecutor is merely pursuing what he or she perceives to have become an accepted practice, the inescapable conclusion remains that the accused’s ability to defend is materially affected. This is especially heightened in a case such as this, where the discovery is anticipated to be extraordinarily voluminous, requiring high powered computers even to access much of the material, and the defendant will presumably have severely restricted access to the discovery while incarcerated.

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The Use of Armed Guards to Secure Mr. Ignatov's Release

The severely restrictive bail package that we propose includes the provision for 24/7 home detention, secured not only by GPS monitoring of the defendant, but by the use of private armed security guards at his apartment which will restrict the entry and exit of both the defendant and any visitors. This is a lawful condition of release under the Bail Reform Act. United States v. Esposito, 749 F. App'x 20, 24 (2d Cir. 2018) (Summary Order). These guards, supplied by a security company approved by the government, would be paid for by the defendant and authorized to use force against him should he attempt to leave the premises without permission. This highly securitized and heavily monitored atmosphere would make it impossible for Mr. Ignatov to flee the United States – or conversely, for unapproved guests to enter his residence – ameliorating concerns that he would violate the conditions of his release.

As the Second Circuit recently opined in September 2018, “district courts are not required to consider private security guards as a condition of release ... *but they are not precluded from doing so when the defendant has substantial resources and such wealth contributes to his risk of flight.*” Esposito, 749 F. App'x at 24 (emphasis supplied) citing United States v. Banki, 369 F. App'x 152, 153 (2d Cir. 2010). This provision has been used to secure the pretrial release of multiple high profile, high net-worth defendants where their access to wealth has cut against their Eighth Amendment right to reasonable bail, including Bernie Madoff, David Brooks, Marc Dreier, Mahender and Varsha Sabhnani, and most recently, Vincent Esposito.¹ All agreed to pay for, and post, armed guards at their home to avoid pretrial detention.

While some district courts have opposed the use of self-funded guards to secure pretrial release, the Second Circuit has not outlawed the practice. Indeed, in Esposito, the Second Circuit specifically indicated that district courts are “not precluded” from considering it as an option for release. Esposito, 749 F. App'x at 24. Further, in Sabhnani, the Second Circuit accepted the condition of “on-site monitoring of [the] defendants’ home confinement” by a “private security firm,” owing in part to the defendants’ agreement to “pay all costs associated [therewith]” 493 F.3d at 78. Such was also the case with Messrs. Madoff, Brooks and Dreier – and would be the case for Mr. Ignatov.

Further, while securing a defendant’s pretrial release with self-funded guards arguably favors the wealthy – a factor that has drawn criticism from certain district courts – it is this very

¹ Additional research has revealed still more instances where the use of private security guards were approved as a condition of pretrial release in the Southern and Eastern Districts of New York. See, e.g., United States v. Seng, No. 15 CR 706 (S.D.N.Y.) (VSB) (Dkt. No. 53); United States v. Juan Angel Napout, No. 15 CR 252 (E.D.N.Y.) (Levy, M.J.) (Dkt. No. 127); United States v. Jeffrey Webb, No. 15 CR 252 (E.D.N.Y.) (Scanlon, M.J.) (Dkt. No. 40).

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access to wealth which is frequently used by the government to argue that a defendant poses a risk of flight. And addressing this potential disparity, Judge Rakoff observed in Dreier that “many kinds of bail conditions favor the rich *But it is not a reason to deny a constitutional right to someone who, for whatever reason, can provide reasonable assurances against flight.*” United States v. Dreier, 09 CR 85 (JSR) (Order dated February 5, 2009) (emphasis supplied); see also United States v. Ng Lap Seng, 15 CR 706 (VSB) (Order dated October 23, 2015 granting pretrial release secured by, *inter alia*, “an armed security team responsible for ... preventing his flight, and compliance with all other conditions of release ... to be paid for by defendant”).

It is respectfully urged, therefore, that the Court adopt the condition of self-funded armed guards securing Mr. Ignatov’s release – an arrangement accepted by the Second Circuit in both Sabhani and Esposito, and by several judges in this district and elsewhere.

**It Cannot Be Credibly Argued that Mr. Ignatov
Poses a Risk of Flight or Danger to the Community**

Other than his foreign citizenship and presumed access to wealth given the nature of the allegations, there is little to suggest that Mr. Ignatov poses a risk of flight, and even less to suggest that he poses any danger to the community. While the nature of the charges surely weigh upon this application, specifically the amount of money OneCoin executives allegedly received from the scheme, an examination of the balance of the 18 U.S.C. §3142 (g) factors, reviewed below, supports his release. Finally, the proposed bail package, which includes self-funded armed guards and a \$20M personal recognizance bond secured by \$10M in property and cash, certainly “assure[s] the appearance of” the defendant and the “safety of the community.” 18. U.S.C. § 3142(e).

i. Applicable Law

In determining whether there are conditions of release that will “reasonably assure” the appearance of Mr. Ignatov at future court appearances and the safety of the community, the following should be considered:

- (1) the nature and circumstances of the offense charged, including whether the offense is a crime of violence, a Federal crime of terrorism, or involves a minor victim or a controlled substance, firearm, explosive, or destructive device;
- (2) the weight of the evidence against the person;
- (3) the history and characteristics of the person, including--

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(A) the person's character, physical and mental condition, family ties, employment, financial resources, length of residence in the community, community ties, past conduct, history relating to drug or alcohol abuse, criminal history, and record concerning appearance at court proceedings; and

(B) whether, at the time of the current offense or arrest, the person was on probation, on parole, or on other release pending trial, sentencing, appeal, or completion of sentence for an offense under Federal, State, or local law; and

(4) the nature and seriousness of the danger to any person or the community that would be posed by the person's release. In considering the conditions of release described in subsection (c)(1)(B)(xi) or (c)(1)(B)(xii) of this section, the judicial officer may upon his own motion, or shall upon the motion of the Government, conduct an inquiry into the source of the property to be designated for potential forfeiture or offered as collateral to secure a bond, and shall decline to accept the designation, or the use as collateral, of property that, because of its source, will not reasonably assure the appearance of the person as required.

18 U.S.C. § 3142 (g). Because the Court is required to examine the § 3142 (g) factors in considering both the defendant's risk of flight and danger to the community, albeit by differing legal standards, they will be discussed together in the proceeding sections. See United States v. Duncan, 897 F. Supp 688, 690-92 (N.D.N.Y. 1995) (18 U.S.C. § 3142 (g) factors are considered in both danger to the community and risk of flight analyses).

Finally, as this Court is aware, assertions that the defendant poses a risk of flight must be proven by a preponderance of the evidence, while allegations that the defendant poses a danger to the community must be proven by clear and convincing evidence. 18 U.S.C. § 3142 (f)(2)(B) ("The facts the judicial officer uses to support a finding pursuant to subsection (e) that no condition or combination of conditions will reasonably assure the safety of any other person in the community shall be supported by clear and convincing evidence"); United States v. Chimurenga, 760 F.2d 400, 405 (2d Cir. 1985) (allegations of flight risk must be supported by a preponderance of the evidence).

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ii. The Nature of the Charges

Mr. Ignatov is not charged with an offense – such as a crime of violence, terrorism, or one that involves a minor victim or controlled substance, firearm, or explosive – for which the bail statute dictates a rebuttable presumption of detention. See 18 U.S.C. § 3142(e)(2). There are no allegations that Mr. Ignatov engaged in any type of violence, nor does he possess any criminal record. Rather, he is alleged to have participated in a conspiracy to commit wire fraud via the marketing of an international cryptocurrency, specifically, by making and abetting materially false statements that induced others to invest. See S7 Superseding Information at pp. 1-2.

While the Complaint alleges that some €2.232B in profits were generated by OneCoin, and therefore the government presumably will argue that Mr. Ignatov has access to vast wealth, courts in this district have routinely found that pretrial release is appropriate for foreign defendants with both financial means and limited ties to this country. See, e.g., United States v. Bodmer, No. 03 CR 947 (SAS), 2004 WL 169790, at *3 (S.D.N.Y. January 28, 2004) (releasing Swiss national on bail); United States v. Khashoggi, 717 F. Supp. 1048, 1050-52 (S.D.N.Y. 1989) (releasing “enormously wealthy” Saudi Arabian national who was facing mail fraud charges despite the fact that there was no extradition treaty in place). Examples of other defendants who are similarly foreign nationals are detailed, *infra*.

iii. The Weight of Evidence Against Mr. Ignatov

It is somewhat difficult to discern the evidence against Mr. Ignatov at this stage. While a detailed complaint was filed and some discovery has been provided, much more remains to be turned over to counsel. Essentially, and as described, supra, the government claims that following the disappearance of Raja Ignatova from public view in 2017, the defendant took on advancing leadership positions within the company behind the cryptocurrency, OneCoin, and in 2018, became one of its leaders. See Complaint at pp. 17-18.

Further, the government advances in the Complaint that Mr. Ignatov made false statements to border patrol agents upon entering the United States concerning both his employment and purpose of his visit. Complaint at pp. 22-23. The government claims that these statements “appear to have been deliberately misleading and untruthful,” and “an attempt by [the defendant] to hide ... the fact that he runs OneCoin, and was visiting to attend a OneCoin event.” Id. at 23. It is somewhat understandable that Mr. Ignatov, knowing of the arrest of Mark Scott, knowing of the seemingly global investigation of OneCoin, would have been nervous to speak to law enforcement about OneCoin upon being questioned by agents after his arrival in the United States, having just stepped off a plane. In addition, the claim that Mr. Ignatov lied to law enforcement upon his arrest at the airport a week later, should be weighed against the fact that he was interviewed without counsel present, presumably with the understanding that he was under

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criminal investigation at the time. Regardless of the truthfulness of his assertions, they should not preclude Mr. Ignatov from being trusted to remain on bail.

Recently, in United States v. Esposito, the government accused another defendant of making false statements to Pretrial Services during a bail interview concerning his own finances – *allegedly omitting some \$3.8M in cash recovered from his own house that same day* and other properties. See United States v. Esposito, 309 F.Supp.3d 24, 28-29 (S.D.N.Y. 2018); see also April 18, 2018 Bail Transcript United States v. Nejad, 18 CR 224 (ALC) (S.D.N.Y.) (Iranian national granted bail despite falsely indicating that his primary residence was in the United States to appear more bailable). Esposito – the son of former Genovese family boss Vincent Gigante – was granted bail over the government’s objection that his claims demonstrated that he could not be trusted to remain in the United States and that he was hoarding vast sums of cash – which could have been used to flee. So too should be the case for Konstantin Ignatov.

iv. The Defendant’s History and Character

We have received over 20 letters from friends and family members on behalf of Mr. Ignatov in support of this application. These individuals are universally shocked that Mr. Ignatov could be charged in any crime. E.g., April 24, 2019 Letter of Ivan Yochkolski, attached as Exhibit 1. They further describe a man who is “disciplined,” (April 10, 2019 Letter of Rosen Dimitrov, attached as Exhibit 2) spends much of his time training in mixed martial arts (see April 9, 2019 Letter of Peter Mustakov, attached as Exhibit 3) and is a dedicated animal lover. See April 7, 2019 Letter of Petyo Pagelski, attached as Exhibit 4. Finally, several of the letters note that Mr. Ignatov poses no risk of absconding, especially given that his girlfriend is expecting their first child. Ltr. of Ivan Yochkolovski, Ex. 1; April 8, 2019 Letter of Angel Varbanov, attached as Exhibit 5 (“Knowing Konstantin, he will be more than happy to appear before you and defend himself”).

First, as noted above, many of those who submitted letters on behalf of Mr. Ignatov expressed shock that he would be charged with a crime based on their experiences with him. As Ivan Yochkolovski writes: “the charges brought against him do not coincide with his persona in any way[,] shape[,] or form.” Ltr. of Ivan Yochkolovski, Ex. 1 (“he is not a person that would want to cheat somebody”). Petyo Pagelski echoes that the charges in this case do “not correspond with the person [he] know[s],” (Ltr. of Petyo Pagelski, Ex. 4) and Angel Varbanov adds: “everything he has done for me and others is just so contradictory to the news I saw on TV [about] him being arrested and detained.” Ltr. of Angel Varbanov, Ex. 5; see also Letter of Sebastian Tost, attached as Exhibit 6 (“shock[ed]” by “[t]he arrest and the allegations”).

Friend Vladimir Gunev concurs with this sentiment, noting: “I am confused with the charges against him as he is very strict about abiding the law.” April 10, 2019 Letter of Vladimir

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Gunev, attached as Exhibit 7. Of his conversations with the defendant on this very topic, Mr. Gunev recalls for the Court:

I am keen on driving a little faster, especially on the highway, and when we were driving last summer to the seaside, we had this discussion that started from speed limits and ended with Konstantin firmly stating that all laws in general exist for a reason and we should all abide them, otherwise it would be chaos. This is why I also know Konstantin is not a flight risk

Id. (emphasis supplied); see also April 8, 2019 Letter of Mihaela Toteva, attached as Exhibit 8 (“I was shocked to hear that he was charged with such a serious crime ... this does not even sound like him”). Asen Chaney echoes: “When I first heard about his arrest, I literally could not believe what was happen[ing] and I was shocked.” April 10, 2019 Letter of Asen Chaney, attached as Exhibit 9; see also April 8, 2019 Letter of Kristina Gouneva, attached as Exhibit 10 (“I was shocked when I read ... that he is suspected to have committed such a serious crime”).

Other writers have observed instances which demonstrate that he is a “giving [and] supportive individual.” Ltr. of Ivan Yochkolovski, Ex. 1. Mr. Yochkolovski notes in his letter to the Court that Mr. Ignatov has been active in fundraising for “cancer and other medical treatments for people in Bulgaria.” Id. Petyo Pagelski adds: “I appreciate him a lot, as he has proven to be a man who I know will always try the best he can to help” Ltr. of Petyo Pagelski, Ex. 4; Ltr. of Rosen Dimitrov, Ex. 2 (“I have always counted on him as a friend who I can confide in and trust even more than I trust myself”). Similarly, Angel Varbanov hails:

He has become one of the most valuable people in my life because I had a big personal drama and he stood by m[e] and spent a lot of time to get me out of the depression I was in[]. I had basically lost my faith in people around me, but he proved [to] me there are still honest, true-blue people

Ltr. of Angel Varbanov, Ex. 5 (emphasis supplied); see also Ltr. of Asen Chaney, Ex. 9 (“He has always been very considerate and understanding, always showing compassion towards anyone who needs advice and help”).

Mr. Ignatov’s father, Plamen, writes that his son “has always helped people in need however he can.” April 7, 2019 Letter of Plamen Ignatov, attached as Exhibit 11. Regarding the defendant’s assistance in his own time of need, Plamen informs the Court:

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A few years ago, I had serious health problems and I had to undergo ... heart surgery. During those hard times for me[,] Konstantin was always by my side, supporting me, [taking on] my responsibilities and ... taking care of the family. Without him I wouldn't have managed to successfully cope with my sickness. Even after the surgery and during the recovery period, Konstantin continued to support me, his mother and his family the way he has always done.

Id. (emphasis supplied). Similarly, friend Vladimir Gunev recalls when he was there to take his girlfriend to the hospital in an emergency:

There was this one time when my girlfriend had to go to the hospital and I was out of town. I called my sister to help my girlfriend and Konstantin just took everything in his hands, dropped everything he was doing, drove my girlfriend to the hospital, talked to the doctors, made sure the best specialists would take care of her and basically did my job. He did not have to, but this is him

Ltr. of Vladimir Gunev, Ex. 7 (emphasis supplied).

Of his assistance to her through the years, Jasmine Tost writes:

Konstantin was always there for me no matter where he was traveling around the world. He is like a big brother to me[] who supports me when I feel unstable. He encourages me when I feel off ... and is the man who just drives me daily to never give up, no matter how many stones life puts in your way

Letter of Jasmine Tost, attached as Exhibit 12; see also Ltr. of Sebastian Tost, Ex. 6 (“he has always helped us as much as he can and even when the financial situation with us seemed poor, he immediately appeared and helped us”). Similarly, Mihaela Toteva proclaims that Mr. Ignatov is “a good listener and ... is always ready to help as much as he can. ... He told me I should believe more in myself” Ltr. of Mihaela Toteva, attached as Exhibit 8; see also Letter of Temenzhka Dimitrova, attached as Exhibit 13 (“good example” for “my own sons”).

Vladimir Nikolov informs the Court of a touching account of the defendant’s good nature in his letter, recalling:

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Three years ago in my hometown ... there was a fundraising campaign for a teenage girl who at birth suffered a severe twist in her spine and needed surgery ... which essentially was life saving I donated money to the campaign and shared it on my Facebook account, and a few minutes later Konstantin called me ... saddened by the girl's story He organized all his friends to help with raising money for the sick girl. I will never forget the tears of gratitude and joy of the girl's mother when I went to the place and gave the raised money. Subsequently, the girl underwent the necessary intervention, she recovered and now lives a new, fulfilling life.

Letter of Vladimir Nikolov, attached as Exhibit 14; Ltr. of Petyo Pagelski, Ex. 4 ("he gathered me and our friends to figure out who we could help a little girl who had health problems").

And still more writers comment on Mr. Ignatov's gentle nature and deep affection for animals. Petyo Pagelski writes: "He always helps people, and not only people, but animals, too. He has adopted several dogs that were almost dead when he took them. And he did not abandon them afterwards, but keeps looking after them." Id. Similarly, Peter Mustakov observes in his letter to the Court: "He helps dog shelters by donating food and spending time with the dogs[,] and is also involved in charity initiatives." Ltr. of Peter Mustakov, Ex. 3; see also April 9, 2019 Letter of L. Ignatova, attached as Exhibit 15 ("He loves animals, especially dogs. Currently he takes care of six dogs. They are all adopted from dog shelters or they were stray animals and he took them from the street").

Lyndall Vile, who praises that Mr. Ignatov is "without a doubt one of the kindest and most genuine people [she has] ever met," similarly informs the Court of the defendant's love of animals, writing: "He takes care of 6 dogs, almost all of which were without homes and in shelters or strays found dumped on the streets." April 9, 2019 Letter of Lyndall Vile, attached as Exhibit 16. And Jasmine Tost recalls: "In the later summer of 2014, we saved a dog [kept] in a cage and found him suitable new home. I immediately thought that this dog was the perfect dog for Konstantin and supported him He cared for the dog all these years" Ltr. of Jasmine Tost, Ex. 12.

Friend Asen Chaney recalls his experiences volunteering at animal shelters and fundraising with the defendant:

I met Konstantin and we became close friends during our visits at the shelter for homeless or sick dogs. I was truly amazed by his love for animals and the way he cares about them. He was the initiator of a charity campaign to raise funds for food and medicine

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for the stray and helpless animals. ... Every month ... we bought food and medicine which we brought to the organizations “Last Hope,” and “Four Paws.”

Ltr. of Asen Chaney, Ex. 9. Vladimir Nikolov confirms: “Konstantin became a benefactor to one of the dog shelters in Sofia, [and] assisted with regular supplies” Letter of Vladimir Nikolov, Ex. 14.

Many of those supporting Mr. Ignatov’s request for bail took the opportunity to proclaim their belief that he “does not pose a flight risk.” See April 7, 2019 Letter of Mitko Dimitrov, attached as Exhibit 17; see also April 9, 2019 Letter of Tsvetan Diklyovski, attached as Exhibit 18 (“I strongly believe he will stand against all charges”). Krasmira Georgieva writes: “I have no doubt that Konstantin will follow the conditions of the bail and he will stay in the United States and fight this case,” (April 9, 2019 Letter of Krasmira Georgieva, attached as Exhibit 19) and attorney Nicole Atansova concurs: “I believe that Konstantin, as a reliable member of the community, is not a flight risk” April 10, 2019 Letter of Nicole Atansova, attached as Exhibit 20; see also April 9, 2019 Letter of Tsvetomira Diklyovski, attached as Exhibit 21. Vladimir Nikolov “firmly believe[s] that he will remain in the United States until the final outcome,” (Ltr. of Vladimir Nikolov, Ex. 14) and Rumen Dimitrov concurs: “I have no doubt that he will appear in court when required” April 10, 2019 Letter of Rumen Dimitrov, attached as Exhibit 22; see also April 17, 2019 Letter of Todor Gounev, attached as Exhibit 23 (“I am convinced that Konstantin is not a flight risk”).

Many Less Likely Candidates Have Been Released on Bail

As noted in the Introduction, pretrial release in this case would not be unreasonable – with many seemingly less suitable candidates routinely being granted bail who similarly are not United States citizens and charged in large, white collar frauds – and many without the condition of 24 hour armed security guards. For example:

- Roger Ng, a Malaysian national and former banker for Goldman Sachs, was granted bail after agreeing to post a \$20M personal recognizance bond secured by \$1M cash. See United States v. Ng Chong Hwa, 18 CR 538 (MKB) (E.D.N.Y.). Mr. Ng was extradited to the United States from Malaysia to face charges that he participated in a scheme to embezzle some \$2.7B from 1MBD, the Malaysian state fund.
- Ali Sadr Hashemi Nejad, an Iranian national with access to untold wealth – billions of dollars – was granted bail via a \$20M bond secured by multiple properties and cash. See United States v. Nejad, 18 CR 224 (ALC) (S.D.N.Y.) (Dkt. Entry 31). Mr. Nejad was arrested while attempting travel to London from

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the United States, and according to the government, he lied to pretrial services about his country of residence in an effort to appear more bailable. See United States v. Nejad, 18 CR 224 (ALC) (S.D.N.Y.) (April 18, 2018 Bail Transcript).

- Adnan Khashoggi, an “enormously wealthy and well-known Saudi Arabian businessman,” was released by Judge Keenan on a \$10M personal recognizance bond secured by \$5M in cash and \$5M in property. Khashoggi, 717 F. Supp. at 1050-52. Notably, at the time of his release, there was no extradition treaty in place between Saudi Arabia and the United States which would have facilitated his transport back to the United States if he had fled.
- Hans Bodmer, a Swiss national and attorney who was arrested in South Korea and charged with violating the Foreign Corrupt Practices Act by, *inter alia*, paying “bribes and authoriz[ing] the payment of bribes to various government officials of the Republic of Azerbaijan,” was released by Judge Scheindlin on a \$1M bond secured by a letter of credit. Bodmer, 2004 WL 169790, at *3. This, despite the government’s complaint that the Swiss government would not “recognize Bodmer’s written waiver of his right to avoid extradition” if he fled. Id. at *2.
- Ng Lap Seng, a Chinese national and billionaire real estate mogul, was charged in a conspiracy wherein over \$1.3B in bribes were funneled to former U.N. ambassador John Ashe. See Nate Raymond, U.S. makes new arrest in U.N. bribery case, Reuters, March 18, 2016, available at <https://in.reuters.com/article/un-corruption/u-s-makes-new-arrest-in-u-n-bribery-case-idINKCN0WK28B> (last viewed May 30, 2019). Despite possessing multiple private planes and being detained while onboard one leaving the United States, Mr. Seng was granted bail by Judge Broderick in the form of a \$50M personal recognizance bond secured by \$20M in cash and a residence. See United States v. Seng, No. 15 CR 706 (S.D.N.Y.) (Dkt. No. 53).
- Jeffrey Webb, a national of the Cayman Islands, was charged with bribery and money laundering related to the international soccer organization, FIFA. See Nine FIFA Officials and Five Corporate Executives Indicted for Racketeering Conspiracy and Corruption, U.S. Department of Justice, May 27, 2015, available at <https://www.justice.gov/opa/pr/nine-fifa-officials-and-five-corporate-executives-indicted-racketeering-conspiracy-and> (last viewed May 30, 2019). Webb was released on a \$10M personal recognizance bond secured by real property, vehicles, and jewelry. See United States v. Webb, No. 15 CR 252 (E.D.N.Y.) (Scanlon, M.J.) (Dkt. No. 40).

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What is more, still less bailable defendants – those charged with crimes of violence – are frequently released in the Southern and Eastern Districts of New York. See, e.g., United States v. Michael J. Persico, 10 CR 147 (E.D.N.Y. 2010) (son of life-imprisoned mob boss, an allegedly powerful Colombo associate charged with racketeering murder); United States v. Modica, 09 CR 1243 (S.D.N.Y. 2010) (powerful Gambino soldier facing racketeering charges including double murder, jury tampering, assault and extortion); United States v. Agate, 08 CR 076 (E.D.N.Y. 2008) (high ranking gangsters charged with violence); United States v. Cutaia, 08 CR 097 (E.D.N.Y. 2008) (same); United States v. Spero, 99 CR 520 (E.D.N.Y. 1999) (acting Bonanno boss facing four murder charges); United States v. John A. Gotti, 98 CR 042 (S.D.N.Y. 1998) (son of life-imprisoned mob boss, allegedly Gambino Acting Boss); United States v. Orena, 93 CR 1366 (E.D.N.Y. 1993) (alleged powerful Colombo Capo and son of Colombo Acting Boss).

Finally, Marc Dreier and Bernie Madoff – both less likely candidates for release than Mr. Ignatov – were released on bail with the condition that they self-fund 24 hour armed security guards. First, according to the very judge who had granted him bail, Dreier “ranked with those who have committed some of the most egregious frauds in history.” See United States v. Dreier, 09 CR 85 (JSR) (Dkt. No. 76, at p. 3) (internal quotation marks omitted). Specifically, as an attorney who “disgraced the venerable profession of law,” Dreier engaged in a “series of frauds over a 7-year period” that exceeded \$740M, “largely to finance a personal life of extraordinary lavishness.” Id. Moreover, Dreier’s attempts to further and cover up his schemes were seemingly unending: “He impersonated clients He created phony client and accounting firm documents He stole from clients He misappropriated funds from bankruptcy-court approved accounts [and] [h]e offered to pay off accounting firm professionals.” Id. at pp. 3-4. And even after he was arrested, “from a prison in Canada, he called his law firm and directed the transfer of millions of dollars from an escrow account to a personal account in his control.” Id. at p. 4 (emphasis supplied).

Bernie Madoff’s fraud was even greater than Dreier’s in scope and duration – and he too was granted bail. A crime of “extraordinary dimensions” that resulted in a loss “greater than \$13 billion,” Madoff’s fraud “affected thousands of investors in the United States and worldwide,” and took place “for more than a generation.” United States v. Madoff, 09 CR 213 (DC) (Dkt. No. 92, at p. 3). Madoff also went to great strides to hide his crimes as he defrauded “individuals, non-profit organizations and for-profit institutions,” and “drove many ... to economic collapse.” Id. at p. 4. Madoff “repeatedly lied to the United States Securities and Exchange Commission (‘SEC’) in written submissions and in sworn testimony,” and “caused to be created fraudulent certified financial statements,” which were sent to the SEC. Id. at p. 5. Indeed, nearly every financial statement that he created and sent out to clients for over twenty years was false. Id. at p. 4. Further, “[w]hen an investigation threatened to uncover his fraud, Madoff resorted to obstruction and lies.” Id. (emphasis supplied). And yet this individual was trusted to remain on bail until his case was resolved. Unlike Dreier and Madoff, Mr. Ignatov can hardly be deemed the brainchild of the fraud charged here. Indeed, according to the

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allegations, he was his sister's personal assistant until late 2017, making travel arrangements and managing her schedule. As his sister has not been apprehended, Mr. Ignatov has become the *de facto* face of the OneCoin operation.

Surely if Dreier and Madoff could be entrusted with pretrial release, so too can Mr. Ignatov, especially considering the severely restrictive conditions that we propose, which ameliorate any concern that he will not return to court.

E. CONCLUSION

For all the foregoing reasons, Mr. Ignatov's pretrial release should be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'JL' with a long horizontal stroke extending to the right.

Jeffrey Lichtman

Encs.

cc: All counsel (by ECF and hand delivery)

EXHIBIT 1

April 24, 2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

My name is Ivan Yochkolovski, I am 33 years old and I have been an infantry officer in the United States Army for 15 years. I have also been doing Brazilian Jiu Jitsu for 15 years and it is through the sport that my relationship with Konstantin Ignatov began.

We met in the gym more than a year ago. My American team has an affiliation in Sofia, Bulgaria and he came to train. In the year that I have known him I can attest that he is an individual of special kind. The charges brought upon him do not coincide with his persona in any way shape or form. My friend is a giving supportive individual. He does not have the heart of a criminal, nor is he capable in any capacity to run or organize the scheme of which he is being accused.

I have known him in his core because over the year we became close and he opened up about his life. He is a very well educated and developed individual. He has been in a positive and well-established environment his entire life. In many cases Konstantin's goodness was to the point where he was naive about other people and his clean thoughts were taken advantage of. I saw that on numerous occasions. He is not a person that would want to cheat somebody or ill wish upon anyone. That just isn't him. Rarely do you find individuals like Konstantin. He came to train regularly at the gym, he had a very positive attitude and was very enthusiastic. He has always supported the team and showed great personality, which made him a lot of friends. He is a philanthrop in his soul and he has always been trying to help anyone he can with as much as he could afford. Me and other of his friends have been supporting him in such causes to donate to cancer and other medical treatments for people in Bulgaria who could not afford it. There are a lot of people who can attest to that. Konstantin supports a very healthy lifestyle; he is a vegan and he does not partake in a lifestyle of a "billion" dollar criminal. I could not even assume he is not innocent. He will see that his innocence is preserved, and that he has been wrongfully accused. For that reason alone he is not a flight risk. If he ever thought that he is in any danger of being put in jail, he would not have roamed around the world freely by himself. The second reason is that he will not want to become a fugitive for the remainder of his life. He is 33 and is soon expecting a child. His character is such that he can not run from the law for another 50 years. That's just not him. Jumping bail is something that he would not do.

Sincerely,

Ivan Yochkolovski

EXHIBIT 2

Town of Novi Iskar, 45 Dimitar Vachev Str.

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

April 10, 2019

Your Honor,

My name is Rosen Mitkov Dimitrov. I am a Bulgarian Sambo practitioner who is three times world champion in Combat Sambo and the trainer of the Bulgarian national team of combat sambo. My twin brother Rumen Dimitrov and I founded the organization TWINS MMA and since then we have been giving chance to young fighters to participate and to show what they can do.

I have known Konstantin for a couple of years, when he came to my gym and asked me to let him become part of TWINS MMA team and train him. At first, I only noticed his many tattoos. He appeared to me as a tough but very cheerful guy. Previously I thought that people with so many tattoos must be badly behaved, but Konstantin proved me wrong.

Konstantin is a very disciplined and energetic person, who always finishes what he has started. His ethics is something I respect very much.

He has always been honest with me, but in a delicate way, not being brutal or offending. I have always counted on him as a friend who I confide in and trust even more than I trust myself, because he knows his strengths and weaknesses and knows his limits without any sign of devastating ego or pride. He never breaks his promises and finds it insulting to tell him to forget about doing something he has promised to do.

I admire his willingness to improve himself, not only physically by doing sports, but also mentally, by reading books all year long. I think he reads more than 50 books each year. I learn a lot of things from him and I am very proud to have such person as a friend. He is fun, humble and very helpful friend. I can say we became friends over the course of a month, and we've been close ever since. I really love that guy, he became part of my family.

Given the recent news that he has been charged with some serious crimes, I do believe the truth will come out it will be proven that he is innocent. Knowing how much Konstantin likes to be outdoors, being locked somewhere must be awful for him and I hope he will be released on bail, so that he can fight the case.

Yours truly,

Rosen Mitkov Dimitrov



EXHIBIT 3

From: Petar Toshkov Mustakov

Address: 2 Parashutist Str., Mirovyane village, Bulgaria

9th April 2019

To:

Hon. Edgardo Ramos

United States District Judge

Southern District of New York

40 Foley Square

New York, New York 10007

Your Honor,

My name is Petar Toshkov Mustakov, I am from Bulgaria and I have known Konstantin for two years. We know each other from sports since we are both into martial arts. I know Konstantin as a very determined, hard-working, very ambitious and good person.

He is the most positive- thinking person that I know, always trying to help others in need. He helps dog shelters by donating food and spending time with the dogs and is also involved in charity initiatives. He often offers me and our friends different initiatives that we feel very well after. I strongly believe that Konstantin is not a dangerous person. I am sure that he will fight the case and prove his innocence and he does not represent a flight risk, because he will never let his name remain uncleared.


Yours truly, 

EXHIBIT 4

By:

Petyo Mladenov Pagelski

Address:

Bulgaria, Novi Iskar, 3 "Kremenica Str., entrance B, floor 3", ap. 9

7th April 2019

To the attention of
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

I am Petyo Mladenov Pagelski and I have known my friend Konstantin Ignatov for a few years. We know each other from the gym where we practice Sambo. He started coming to the gym a couple of months after I started practicing. I remember when he first came to say Hi and he told me that he is impressed with how much effort I put into this. I initially thought he was being ironic, because I was also a beginner, but when I got to know him better I understood that he appreciates other people's willingness and persistence to learn and achieve something more and he is just frank when he talks and tells you everything that is on his mind. I really like this quality, because I know that I can count on everything he has said and promised. I appreciate him a lot, as he has proven to be a man who I know will always try the best he can to help and will never ask for any appraisal. He always helps people, and not only people, but animals, too. He has adopted several dogs that were almost dead when he took them. And he did not abandon them afterwards but keeps looking after them. Several months ago he gathered me and our friends to figure out how we could help a little girl who had health problems.

Now there are some serious charges against him, I cannot even assume he could be guilty, as this does not correspond with the person I know. Konstantin is indeed a man of his word and has never broken a promise, no matter if it was for something not that important or very important. I am certain that if his bail application is approved, he would not be a flight risk and he will definitely show in court to sort out this case.

Kind regards,

Petyo Mladenov Pagelski



EXHIBIT 5

Angel Kostadinov Varbanov

Sofia, 509 Ovcha Kupel, Residential complex , entr A, floor 2, ap. 4

8th April 2019

To the attention of:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Dear Judge Ramos,

My name is Angel, I have known Konstantin for a couple of years. For this time I have had a lot of positive emotions, who changed my life, thanks to my friend Konstantin.

I got to know him when I started practicing martial arts and it turned out we have a lot of common interests not only for sports, but for music and healthy- living. He has become one of the most valuable people in my life because I had a big personal drama and he stood by myself and spent a lot of time to get me out of the depression I was into. I had basically lost my faith in people around me, but he proved me there are still honest, true- blue people, who can only serve as an example to others and inspire them to live up to the highest moral principles. His personal example of everything he has done for me and for others is just so contradictory to the news I saw on TV for him being arrested and detained. For this reason I think there must be some great confusion around the accusations against him and I am absolutely confident he will prove his innocence. Knowing Konstantin, he will be more than happy to appear before you and defend himself and I only wish he is safe and be able to wait for the trial outside of the detention centre, because it must be very devastating to be there.

Respectfully,



Angel Kostadinov Varbanov

EXHIBIT 6

КОНФИДЕНТ

Офис 1000 ул. "6 Септември" № 4 етаж 5 тел: 02 / 980 93 17 мобилен: 0886 80 45 73
България 1000 Sofia, Bulgaria 4 "6" Septemvri St. fl. 5 tel: +359 2 / 980 93 17 mobile: +359 866 80 45 73
E-mail: office@confident-bg.com ; www.confident-bg.com

Translation from German

To:

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Dear Sirs and Madams,

My name is Sebastian Tost and I write here a few lines about Konstantin Ignatov, how I met him and how he became a part of my life and that of my family.

As regards myself – my name is Sebastian Tost and I was born on 20.05.1985 in Eisenach.

I am married to Jasmine Tost and together we have 2 children.

I met Konstantin Ignatov through my wife in the middle of 2014 due to a dog-related support.

Konstantin Ignatov has been a close and important friend of my wife for a long time and in the following years he became also a good friend of mine and a part of our family.

Since last year he became also the godfather of our son Paulo Patrice and also our daughter has him close in her heart.

Over the years, I know him as a helpful, friendly and loyal person. Until his arrest, he was in constant contact with my wife and always was open to hear our concerns and problems.

He has always helped us as much as he can, and even when the financial situation with us seemed poor, he immediately appeared and helped us.

It's not just the fact that he helped us in different situations, indeed he always thought about others. It was also happened to give a new home to dogs with him or to support a shelter for animals with food, as well as to support social projects.

Konstantin Ignatov is not only concerned about himself and that he is well, he also thinks of his family, his friends and people who are not so well.

The arrest and the allegations that have been accused of shocking me, respective us and are incomprehensible for ourselves.

I believe in his innocence and hope to be able to give a hug him soon.

Sincerely,

(signature – illegible)

Sebastian Tost

I, the undersigned Kristina Kochumova, attest to the authenticity of the German - English translation I have made of the attached document. The translation consists of 1 (one) page.

Translator



To:

Hon. Edgardo Ramos

United States District Judge

Southern District of New York

40 Foley Square

New York, New York 10007

Sehr geehrte Damen und Herren,

mein Name ist Sebastian Tost und ich schreibe ihnen hier ein paar Zeilen über Konstantin Ignatov, wie ich ihn kennengelernt habe und er ein Teil meines und dem Leben meiner Familie wurde.

Zu meiner Person, ich heiße Sebastian Tost und bin am 20.05.1985 in Eisenach geboren.

Ich bin mit Jasmine Tost verheiratet und zusammen haben wir 2 Kinder.

Konstantin Ignatov habe ich durch meine Frau Mitte 2014 kennengelernt auf Grund einer Vermittlung eines Hundes.

Konstantin Ignatov war schon seit einiger Zeit ein enger und wichtiger Freund meiner Frau und in den folgenden Jahren wurde er auch ein guter Freund von mir und ein Teil unserer Familie.

Seit letztem Jahr ist er auch der Patenonkel unseres Sohnes Paulo Patrice und auch unsere Tochter hat ihn in ihr Herz geschlossen.

Über die Jahre hab ich ihn als hilfsbereiten, freundlichen und loyalen Menschen kennengelernt.

Er stand bis zu seiner Verhaftung im ständigen Kontakt mit meiner Frau und hatte immer ein offenes Ohr für Sorgen und Probleme.

Er stand uns immer mit Rat und Tat zur Seite und selbst wenn es finanziell mal schlecht bei uns aussah war er sofort zur Stelle und hat uns geholfen.

Nicht nur, dass er uns in verschiedenen Situationen geholfen hat, er hat auch immer an andere Gedacht. Sei es das er Hunden ein neues zuhause bei sich gegeben hat oder ein Tierheim mit Futter unterstützte oder soziale Projekte unterstützt hat.

Konstantin Ignatov ist nicht nur auf sich bedacht und das es ihm gut geht, er denkt auch an seine Familie, seine Freunde und an Menschen denen es nicht so gut geht.

Die Verhaftung und die Anschuldigungen die ihm vorgeworfen werden haben mich bzw. uns schockiert und sind von uns nicht nachvollziehbar.

Ich glaube an seine Unschuld und hoffe, ihn schon bald wieder in die Arme schließen zu können.

Mit freundlichem Gruß



Sebastian Tost

EXHIBIT 7

10th April 2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

My name is Vladimir Todorov Gunev and Konstantin Ignatov is my sister's (Kristina Gouneva) boyfriend.

I am 28 years old and Kristina is my bigger sister. When she started dating Konstantin, I was very curious to see him, because she is very hard to be impressed as she expects the perfect attitude and has many requirements. Konstantin didn't look like anyone she has dated so far, but when I saw how happy he makes her and how excited she is about him and always in her best mood when she is with him, I sorted out he must be worth it.

I managed to understand what is this about him that she likes, but also that makes him a person worth knowing. Konstantin is well- behaved, calm and with good temper. He is responsible and helpful. There was this one time when my girlfriend had to go to hospital and I was out of town. I called my sister to help my girlfriend and Konstantin just took everything in his hands, dropped everything he was doing, drove my girlfriend to the hospital, talked with the doctors, made sure the best specialists would take care for her and basically did my job. He did not have to, but this is just him as it turned out many times after that- he would do everything to help if he can and he will put the interest of his family before his own. And, indeed, I do treat him as family already.

I am confused with the charges against him as he is very strict about abiding the law. I am keen on driving a little faster, especially on the highway, and when we were driving last summer to the seaside, we had this discussion that started from speed limits and ended with Konstantin firmly stating that all laws in general exist for a reason and we should all abide them, otherwise it would be chaos. This is why I also know Konstantin is not a flight risk and I hope his bail application will be approved .

Yours Faithfully,



/Vladimir Gunev/

7 Zeleno dyrvo Str.
Sofia, Bulgaria
+359 889378985

EXHIBIT 8

A: 7 Zeleno darvo Str.
1134 Sofia, Bulgaria
M: +359889918120.

8th April 2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

My name is Mihaela Miroslavova Toteva and I am a friend of Konstantin Ignatov. I was shocked to hear he was charged with such a serious crime and he would need to appear before you to argue for bail, because this does not even sound like him. I really hope Konstantin will be able to prove he is innocent.

I live in Bulgaria, I am 31- year-old and I have known Konstantin for less than a couple of years, when he started dating my best friend Kristina, who was my flat- mate back then. I must say I am always very careful and even suspicious when it comes to my best friend's new boyfriend, because, naturally, we look after each other and want to make sure she will feel well with the person next to her. It turned out that he is a nice and caring guy, who I approve of very much!

When you are already in your thirty's, it is very rare to meet someone who you would like to call your friend. And I feel very lucky I have met Konstantin and I am very proud I can call him my friend. I was initially intimidated by his tattoos and could only look at them, until I got to know him better and tattoos no longer made any impression to me. He treats people with respect and without any prejudices. I guess because he himself has suffered a lot from other's prejudices. Konstantin has a very good attitude to people, he is a good listener and he is always ready to help as much as he can. Last time I broke up with my boyfriend, and I was a mess, he accidentally saw me on the street and without any questions about what has happened to me, he just sensed I was not feeling well, and even though he was hurrying for somewhere, he stopped to talk with me and understand what has happened. He told me I should believe more in myself and that I deserve a better person and I can always count on him if I need any help. I appreciated this so much.

What I most like about him is how he treats my best friend Kristina and how she feels around him. They have different lifestyles, but they are so attracted to each other and everything happens so naturally. Their smile does not fall from their faces when they are together or when they chat with each other over the phone. And when they learned they are expecting their baby, they were so happy. Konstantin promised to be the best father in the world and immediately started thinking what books for new-born babies he shall start reading and thought of even more ways to make Kristina feel well now she was pregnant. They are making plans for their baby and their future life

and I believe he will do everything possible to clear his name and prove his innocence. I hope his bail application will be approved as there is really no need to hold him arrested or contained, because he does not have a reason not to fight this case, and containing any innocent person can have major effects on their physical and mental health, which would be such a pity, especially when this person is a future father and would like to give their best to their child.

Sincerely,

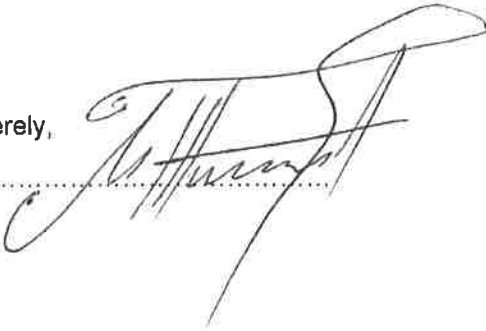
A handwritten signature in black ink, appearing to read "J. Murphy". The signature is written in a cursive style with a large, looping initial "J" and a long, sweeping underline that extends to the right.

EXHIBIT 9

To:

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

April 10, 2019

Dear Judge Ramos,

My name is Asen Chaney and I have known Konstantin Ignatov for 2-3 years already. When I first heard about his arrest, I literally could not believe what has happened and I was shocked.

For me Konstantin is a very open-minded person and a really good friend. He is very responsible and has a big heart. He has always been very considerate and understanding, always showing compassion towards anyone who needs advice or help.

I met Konstantin and we became close friends during our visits at the shelter for homeless or sick dogs. I was truly amazed by his love for animals and the way he cares about them. He was the initiator of a charity campaign to raise funds for food and medicine for the stray and helpless animals. During that time, I was feeling proud to be part of his campaign and, as I saw his kindness, I felt a better person myself. Every month we opened the box with the charity funds and bought food and medicine which we brought to the organizations "Last hope" and "Four paws". At that we became close and he became my best friend. He showed how different he is and how loyal he can be.

When he helped me to cope with the hardest moment of my life, when everybody ran away and forgot about me, he was there for me. And at that time, I knew how kind his heart is and what good friend he is. And exactly because of his honesty and responsibility he would stay firm and prove that he is innocent.

Sincerely yours,

Asen Chaney

A handwritten signature in black ink, appearing to be 'Asen Chaney', written over a light blue horizontal line.

EXHIBIT 10

Kristina Gouneva
A: 9 Graf Ignatiev Str.
1000 Sofia, Bulgaria
M: 00359 887 242 734

8th April 2019

To: Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

My name is Kristina Gouneva. I am 31 years old, Bulgarian citizen. I am writing with respect to Konstantin Ignatov's bail application and his appearance before the Court to argue for bail, aiming to convince you that he deserves trust and that he can be relied on – fact that I strongly believe in.

I met Konstantin Ignatov for the first time a year and 4 months ago and he is now the love of my life and the father of the child I will give birth to hopefully at the end of October 2019. There is no doubt he is the sweetest, kindest and the most caring and loving man I have ever met. And I must say I feel lucky that he will soon be the father of my child and I am so happy I have this responsible, noble and generous man by my side. My whole family loves him, and they are all very impressed with his sense of responsibility and justice, his huge heart and respectful attitude. We all became so close in a very short time.

I still cannot believe what has happened to us. We were so happy with the news about the baby. Then the news for him being arrested came to me on 7th of March, and here starts my nightmare. I was shocked when I read the complaint against Konstantin and that he is suspected to have committed such a serious crime. Your Honor, I know Konstantin very well, and for the past year I have spend most of my daily life with him, and I must say that the statements set in the complaint have nothing to do with Konstantin I know. There is a major misunderstanding and I strongly believe, Your Honor, that you will not let a person as Konstantin, spend even one more day in jail, because of a simple misunderstanding and statements supported by no evidence. I am convinced that Konstantin will soon manage to prove his innocence, but meanwhile such kind and sensitive person does not deserve to spend even a day in such place, where I can assure you, he doesn't belong. Konstantin is not a criminal, he is honest and honorable man, always helping and giving. Konstantin is a very proud and moral person, and he will never allow such a black spot to remain on his name, and he will cooperate with authorities in any way to clear his name and reputation, for which he has worked for a lifetime. That is way I am convinced that he will obey the court's conditions of release should bail be granted and is not a flight risk.

I sincerely hope that the United States Justice system will treat him in accordance with the principle of innocence until proven guilty, and that he will be allowed to have at least close to a normal life until a final ruling on his guilt/innocence.

Sincerely,



Kristina Gouneva

EXHIBIT 11

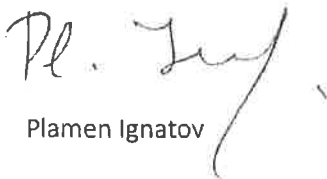
Plamen Ignatov
Home address: Lyuliakova gradina str. 3
Bulgaria, Sofia city, 1113
Mob: 00359 885 836 519

7th April 2019

To
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

I am Konstantin's father. I am proud of him and I am thankful to have him. He is my only son and because of that me and him have always been really close to each other. He is a very kind person, really caring and respectful, he is a good listener and has always helped people in need however he can, most of the time taking the initiative even before being asked for help. A few years ago, I had serious health problems and I had to undergo a heart surgery. During those hard times for me Konstantin was always by my side, supporting me, overtook my responsibilities and was taking care of the family. Without him I wouldn't have managed to successfully cope with my sickness. Even after the surgery and during the recovery period, Konstantin continued to support me, his mother and his family the way he has always done. I am grateful from the bottom of my heart and I am blessed to have a son like him. I am sure that not only in good but in bad times as well he would still be supporting his family and would do even the impossible to help anyone who needs him. I am also sure that his current situation is a result of a misunderstanding and I am sure that he will manage to convince everyone in that because he is a strong, sincere and noble young man and couldn't have possibly done any harm to anyone.

Yours faithfully,



Plamen Ignatov

EXHIBIT 12

КОНФИДЕНТ

Конфит 1000 ул. 5 * септември № 4 * етаж 5 тел. 02 * 980 93 17, мобилен: 0886 60 45 73
1000 Sofia, Bulgaria, 4 * 5 * Septemvri St. fl. 5; tel. +359 2 * 980 93 17, mobile +359 886 60 45 73
E-mail: office@confident-bg.com ; www.confident-bg.com

Translation from German

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Dear Sirs and Madams,

My name is Jasmine Tost, born 20.10.1986, I have 2 children and I live in Germany.

I would like to tell you today how I met Konstantin Ignatov and how I consider him as a human being.

I met Konstantin for the first time in autumn 2013 in Stuttgart in a tattoo studio. We started talking about a mutual friend and began to understand each other very well immediately. The love to our dogs connected us quickly. We kept regular contact from this day on.

In the late summer of 2014, we saved a dog retained in a cage and found him a suitable new home. I immediately thought that this dog was the perfect dog for Konstantin and supported him regarding the dog. He cared for the dog all these years and namely through this support from my part our friendship became deeper and stronger.

Konstantin was always there for me no matter where he was travelling around the world. He is like a big brother to me, who supports me when I feel unstable. He encourages me when I feel off powers and is the man who just drives me daily to never give up, no matter how many stones life puts in your way. He also supported me financially when I was out of money.

Konstantin Ignatov is the godfather of our son Paulo Patrice. Our children adore him and are always happy when he visits us. He was also an honourable guest at our wedding in July 2017. I am glad and grateful to have him in my life and I know how to appreciate his friendship. I cannot imagine that Konstantin should have violated the law. He is the most honest, loyal and warmest person I know. I hope the matter will be resolved very soon and Konstantin may be free again. Also, I am sure that Konstantin Ignatov will be willing to participate in the clarification of the case. We really miss him very much!

Sincerely,
(signature – illegible)
Jasmine Tost

I, the undersigned Kristina Madjounova, attest to the authenticity of the German - English translation I have made of the attached document. The translation consists of 1 (one) page.

Translator



To:

Hon. Edgardo Ramos

United States District Judge

Southern District of New York

40 Foley Square

New York, New York 10007

Sehr geehrte Damen und Herren,

mein Name ist Jasmine Tost, geboren am 20.10.1986, habe 2 Kinder und ich lebe in Deutschland.

Ich möchte Ihnen heute erzählen, wie ich Konstantin Ignatov kennen gelernt habe und wie ich ihn als Mensch einschätze.

Ich traf Konstantin das erste mal im Herbst 2013 in Stuttgart in einem Tattoo Studio. Wir kamen ins Gespräch über einen gemeinsamen Freund und verstanden uns auf Anhieb sehr gut. Die Liebe zu unseren Hunden verband uns schnell. Wir hielten ab diesem Tag regelmäßig Kontakt.

Im späten Sommer 2014 halfen wir einem Hund aus einer Zwingerhaltung raus und suchten ein neues und geeignetes Zuhause. Ich spürte gleich, dass diese Hündin der perfekte Hund für Konstantin war und vermittelte sie an ihn. Er kümmerte sich all die Jahre rührend um sie und durch diese Vermittlung wurde unsere Freundschaft immer tiefer und stärker.

Konstantin war immer für mich da, egal wo er gerade auf der Welt unterwegs war. Er ist für mich wie ein großer Bruder, der mich stützt, wenn ich mal wanke. Der mich stärkt, wenn meine Kräfte schwinden und der mich einfach täglich Antreibt, niemals aufzugeben, egal wie viele Steine das Leben einem auch in den Weg stellt. Auch half er uns finanziell, wenn es mal eng wurde.

Konstantin Ignatov ist der Patenonkel unseres Sohnes Paulo Patrice. Unsere Kinder sind ganz vernarrt in ihn und immer glücklich, wenn er zu Besuch ist. Auch war er der Ehrengast auf unserer Hochzeit im Juli 2017. Ich bin froh und dankbar, ihn in meinem Leben zu haben und ich weiß seine Freundschaft zu schätzen. Ich kann mir nicht vorstellen, dass Konstantin gegen das Gesetz verstoßen haben soll. Er ist der ehrlichste, loyalste und herzlichste Mensch den ich kenne. Ich hoffe die Angelegenheit wird sehr bald geklärt und Konstantin darf wieder frei sein. Auch bin ich mir sicher, dass Konstantin Ignatov gewillt sein wird, bei der Aufklärung mitzuwirken. Wir vermissen ihn wirklich sehr!

Mit freundlichem Gruß



Jasmine Tost

EXHIBIT 13

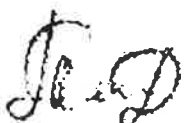
Temenuzhka Sokolova Dimitrova
Town of Novi Iskar, 3 Kremenica Str., entrance B, floor 3 ap. 9

7th April, 2019

To the attention of
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

I am Temenuzhka Dimitrova and my sons Rumen and Rosen brought Konstantin to a Saturday lunch at home. When I met Konstantin, I couldn't help asking myself if this boy ever stops smiling? Over time, it was Konstantin who never quit telling me that I should never forget to smile and that "anyone can take everything from you, but not your smile"! And he has brought a lot of smiles in our home, making our family bigger with one more son. I am always very happy when he comes every Saturday and I always cook his favorite vegan dishes with great pleasure. He very much likes how I cook the bean and lentils soup for him and I am very fond when I see his big smile when he sees them on the table. He never forgets to thank me and show how much he appreciates my time cooking them. Even my own sons stopped taking me for granted, because of Konstantin and started showing appreciation for my time preparing for them. And I see a great difference in them, being more positive and more kind and determined because of the good example Konstantin gives them. I am very thankful Konstantin joined our life and makes it complete and more meaningful with such small but essential things like showing appreciation, being respectful, responsible and showing he cares. That's why I miss our Saturday lunches very much now and wait for him to prove that these serious crimes he has been accused of are not true. Konstantin has a very strong sense of dignity and self-respect and he will do everything necessary to clear up his name. I hope his bail will be approved, so that he is safe while he fights the case.

Sincerely, 

TamaraMika Scholtes Ombrows
Town of Hualapai, 3 Koonance St. Suite 10, Box 3, 9

7 * April, 2018

To the attention of
Hon. Stephen Rocco
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

I am TamaraMika Ombrows and my sons Roman and Roman brought Konstantin to a Saturday lunch at home. When I met Konstantin, I couldn't help asking myself if this boy ever stops smiling? Over time, I met Konstantin who never quit telling me that I should never forget to smile and that "smiles can take everything from you, but not your smile". And he has brought a lot of smiles in our home, making our family bigger with one more son. I am always very happy when he comes every Saturday and I always cook his favorite recipe dishes with great pleasure. He very much likes how I cook the taste and looks away for him and I am very kind when I see his big smile when he sees them on the table. He never happens to thank me and show how much he appreciates my love cooking them. Even my own sons stopped taking me for granted because of Konstantin and started showing appreciation for my love preparing for them. And I take a great difference in them, being more positive and more kind and determined because of the good example Konstantin gives them. I am very thankful Konstantin passed our life and values of compassion and more meaningful with such small but essential things like showing appreciation, being respectful, responsible and showing he cares. That's why I miss our Saturday lunches very much now and wait for him to prove that these actions others he has been accused of are not true. Konstantin has a very strong sense of dignity and self-respect and he will do everything necessary to clear up his name. I hope his dad will be surprised, so that he is safe while he fights the case.

Sincerely, 

EXHIBIT 14

TO
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

CHARACTER LETTER for KONSTANTIN IGNATOV

From: Vladimir Ivanov Nikolov
Personal Identification Number 8508246605
Sofia, Bulgaria
District Vitosha, Chavdar Mutafov 10 str, postal code 1700
Mail: purezzone@abv.bg cell phone: +359888006114

Your honor,

I have known Konstantin Ignatov and his family for more than five years, and I boldly say that at that time they have become one of my closest friends - for me they are as part of my family.

I am aware that at present the law enforcement authorities of the United States of America have charged him with a serious crime and that Konstantin will appear before you, your honor, to argue for bail. In his support I want to tell you my personal impressions of him.

My first great impression of Konstantin was his spiritual purity and simplicity, as well as his love for children and animals, the fact that he is a vegan and his commitment to protecting the environment and protecting the rights of the needy. This set of positive qualities I have rarely encountered in one person. We quickly approached our common interests, started to see each other often and share experiences in our sporting activities, to support and advise as our close friends do.

Konstantin is humble, good, responsible, loving person. For me, he has always been an example of stability. He not drinking alcohol and is looking after his health, and responds with joy to help everyone who wants to follow a positive development and build himself as successful people, an example of what he is.

From my experience, I know that one can easily recognize if a person is good and noble in the attitude he has toward the weaker. Konstantin moved from Germany back to Bulgaria 2 years ago together with his two dogs, Magot and Otto, for whom he cared like they are his children, and then his number of pet lovers increased further. Konstantin became a benefactor of one of the dog shelters in Sofia, which assisted with regular supplies with dog food there. He also provides these poor animals with love and care, and he sincerely enjoys being a little kid in their company. Years later I saw again that joy in his eyes and his stature in his visits to Africa and his encounter with local children, most of whom without almost any financial and social possibilities.

I also want to share with you my personal experiences and impressions from Konstantin. Three years ago, in my hometown, which name is Parvomai, there was a fundraising campaign for a teenage girl who at birth suffered a severe twist in her spine and needed surgery and implantation in her spine, which essentially was life-saving, the child even could no longer sleep from the pain she felt. Like any compassionate person, I donated money to the campaign and shared it in my Facebook account, and a few minutes later Konstantin called me excitedly and saddened by the girl's story, he asked how and with what he could help. He organized all his friends to help with raising money for the sick girl. I will never forget the tears of gratitude and joy of the girl's mother when I went to the place and gave the raised money. Subsequently, the girl underwent the necessary intervention, she recovered and now lives a new, fulfilling life - Konstantin is part of this new life and will always be. In this line of thought I have two favorite sentences that Konstantin fully shares - "There is no taller person than the one who has bent to help someone in need" and "One of the most real and life-giving things is to help someone who can never have the opportunity to thank you "

Another case in which I once again recognized his generosity and a great heart was last year when my father's health deteriorated drastically. He was first diagnosed with heart failure, which required an operation that later turned out that my father could not withstand without being treated with Simdax beforehand, which you notice was not available in Bulgaria. From the moment, when Konstantin and his family understood what was going on, I had a lot of support - almost day and night he was looking for the drug through his friends and acquaintances in Germany, the UK, Ireland, Spain. Konstantin did not separate from me and supported me all the time. Unfortunately, months later, my father suffered a second stroke disorder, this time in his brain, and I found myself in a situation where I had to spend a sum of money for medical treatment - again Konstantin was supposed to help me with his own resources by giving me all his savings, and on his own initiative, without even having asked for it. I could always rely on his help and support, his friendly shoulder, and of course he on mine too.

With all my personality, with all my conduct, with all my responsibility, I know Konstantin as an exceptional friend, a valiant man, an honest man who will now more than ever show boldness and will fully co-operate with the judiciary to clarify the case, assists in the lawsuit and will do so to clear his name. I firmly believe that Konstantin deserves to be released on bail and to be given the opportunity to safely prove his innocence and he will do so. I also firmly believe that he will remain in the United States until the final outcome of the trial and that he will not violate his guarantee/bail in any way nor impede justice.

For everything I share with you above, I swear in the Bible that I told the truth, only the truth and the whole truth!

Vladimir Nikolov




EXHIBIT 15

*A: 3 Lyuliakova gradina Str.
11113 Sofia, Bulgaria
M: 00359 884 269 289*

9th April 2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

I am Konstantin's mother and I have always been proud of him. Since he was a little boy we have taught him to love and respect family members and relatives, to help with household chores, to respect his grandparents as well. Towards his neighbours he has always been kind, respectful and has always been a child, demonstrating good manners. Since he was very young, he has always had lots of friends – neighbourhood kids, with whom they used to organize and play games, they used to go to the movies together, or they were just dreaming and making plans for the future. Thanks to our family, to his amazing teachers at the school he used to visit and also thanks to the books he is constantly reading, Konstantin grew up as an intelligent and responsible young man on whom you can always rely. If I need any kind of help or advice, he always responds and in many cases, he takes the initiative himself, offering to help with whatever is needed. Konstantin is the son every mother would dream of having – to be proud of him and to be happy to have him. Konstantin is a very social person – he is always surrounded by lots of friends. They travel a lot together, go to musical concerts together or they just gather for a cosy evening together. Many of his friends he has known from his school years and despite the distance of time and despite the fact that some of them live in different cities or even countries, they still manage to see each other. With time passing by, many of his friends have families of their own, but Konstantin still manages to keep in touch with them – he goes to visit them or invites them in his home. Konstantin has many and different hobbies – he loves playing sports and helps his friends play sports, too. He leads a healthy and rational life, he does not smoke or drink alcohol at all. He loves animals, especially dogs. Currently he takes care of six dogs. They are either adopted from dog shelters or they were stray animals and he took them from the street to provide them with a loving and peaceful home, where they will be well taken care of. When it comes to his job, I am aware that he is a very responsible and reliable person, he is always honest and well-mannered with his colleagues. Their work relations in the office are based on mutual trust and respect. I am sure that what is happening to Konstantin right now is an awful misunderstanding, something he is absolutely not guilty of. I sincerely hope the further development of the case proves his innocence

and I sincerely hope that over time he will be able to clear his name from all defamations and accusations. I am positive that he will cooperate with whatever he can to help authorities reveal the truth about himself.

I can write further about Konstantin but I sincerely hope that this will be enough for everyone to know what a wonderful son, friend and colleague he is. Konstantin is role model – always helping everyone with whatever he can and a person you can always count on.

Yours truly,

A handwritten signature in dark ink, appearing to read "I. Y. Gator". The signature is written in a cursive, somewhat stylized font. The "I" is a simple vertical line, "Y" is formed by two diagonal strokes meeting at a point, and "Gator" is written in a fluid, connected script.

EXHIBIT 16

A: 1/6 Alan Street Cammeray. Sydney. NSW. Australia.
2062 P: +613 419 163 142

9.04.2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square. New York. New York 10007

Your Honor,

My name is Lyndall Vile and I am a good friend of Konstantin Ignatov. I have known Konstantin for about 2.5 years; we met when he was in Sydney on a brief holiday and despite the distance between us we have stayed in contact ever since.

I am aware of the reasons surrounding Konstantin's detainment however I would like to take the opportunity to highlight some of his positive characteristics that I've come to know and love - Konstantin has always made time for conversation despite the time difference and has even opened his home for me to visit and stay on two occasions. He's introduced me to his wonderful parents and friends, taken me to music concerts and showed me around his beautiful home country - Konstantin is without a doubt one of the kindest and most genuine people I have ever met.

He takes care of 6 dogs, almost all of which were without homes and in shelters or strays found dumped on the streets; as a dog owner myself I think that this is an incredible act of love and kindness. Konstantin is honest, intelligent and reliable and has always acted with generosity to his friends, family and colleagues.

I have no doubt in my mind that Konstantin Ignatov will cooperate with authorities to prove his innocence.

Please don't hesitate to contact me for further information.

You're truly,

Lyndall Vile

A handwritten signature in black ink, appearing to read 'Lyndall Vile', with a long, sweeping horizontal line extending to the right.

EXHIBIT 17

Mitko Marinov Dimitrov
Bulgaria, Novi Iskar, 3 Kremenica Str., entr. B, fl. 3, ap. 9

7th April, 2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

I am Mitko Dimitrov and I have known Konstantin for almost two years. My sons Rumen and Rosen introduced Konstantin to me one Saturday when they invited him to our family lunch. I am from that generation which does not approve of tattoos and when we first met, his tattoos did not make a good impression to me. But it took just one lunch to see he is not his tattoos but a very positive, good and cheerful young man, which makes a very good company, because he is humble, well- educated and has many interests related to doing sports, reading, charity and music. It became a tradition to have him every Saturday with us to share our family lunch and he has become a family member already. We share good and bad times. We often joke he is my third son. And I am very happy my sons Rosen and Rumen have had the chance to meet such a good person and make friends with him, because he has a very good influence on them being a great example for a hard- working, loyal and strong man.

I can say that I know Konstantin well because we have spent a lot of time together and I know his values and how much he believes in God and lives up to his rules and this is why I don't believe that he can do something unlawful. I know that Konstantin will prove this in court and will not leave such a stain on his name and for this reason he does not pose a flight risk.

Sincerely,



EXHIBIT 18

Tsvetan Diklyovski

mob. +359 898 502709
Sofia, Bulgaria
email: ceco_dc@abv.bg

April 9, 2019
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Dear Hon. Judge Ramos,

I am writing to you on the matter of Konstantin Ignatov bail application. He is a cousin of my wife Tsvetomira Diklyovski. I do recognize the seriousness of the allegations he is facing and as such I would like to share that he was and is always serious in his affairs and the family therefore I strongly believe he will stand against all charges to have his name cleaned.

Thank you for your attention
Tsvetan Diklyovski



EXHIBIT 19

9th April 2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

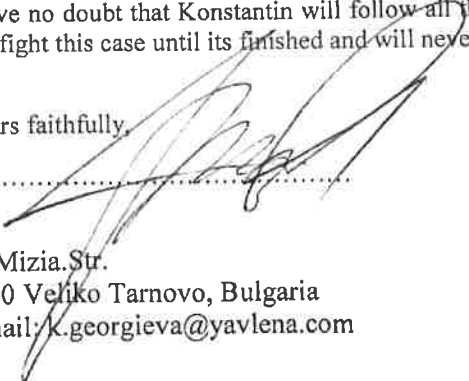
Your Honor,

My name is Krasimira Georgieva, I am 57 years old and I hope one day Konstantin Ignatov will be my son-of-law. My daughter, Kristina Gouneva, started dating him about a year and a half ago and I finally felt she met a man I would approve of. Konstantin is a kind boy, with good manners and with a lot of good in him.

First time they came to visit me, I understood how thoughtful he is as I was very concerned what to cook him, because he is a vegan and I wanted to make him comfortable and show some hospitality. The boy had brought some food with him in order not to bother me or anyone with his choice of being a vegan. I was fascinated. And this was just the beginning. He is so respectful and makes you feel comfortable and safe in his company. I feel calm and comfortable when my daughter is with him, because I recognize in this boy a lot of strength, ambition and rationality. I see that my daughter feels very secure with him and this makes me happy. I am even happier now that they are expecting their first child and I am convinced he will be able to prove before you he has done nothing wrong. I do hope that his bail application will be approved in order for him to be able to keep his mental and physical health in good shape, so that when the case is closed, he can return safe home and be next to my daughter and the child they are expecting.

I have no doubt that Konstantin will follow all the conditions of the bail and he will stay in the United States and fight this case until its finished and will never "jump bail."

Yours faithfully,



14 Mizia.Str.
5000 Veliko Tarnovo, Bulgaria
e-mail: k.georgieva@yavlena.com

EXHIBIT 20

Nicole Atanasova
Adresse : 47 Kroum Popov Str.
Sofia, Bulgaria.

10th April 2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

My name is Nicole Atanasova and I am lawyer with the Sofia Bar Association since 2013.

I have known Konstantin since last year as our first encounter was in the course of my work duties as a lawyer. My first impression of him was to be a calm, balanced and nice person who despite his nonstandard look has revealed to be a very responsible and reliable employee dedicated to performing his responsibilities with due diligence.

My understanding of his character has evolved given that in the past 6 or so months he has been dating my colleague att. Kristina Gouneva. I have been a firsthand witness to his love for her and all the attention and care he has shown in their relationship. He has proven to be a loving and understanding partner on who Kristina could always count on for moral support and life advise.

Given my above impressions on Konstantin's character I am writing this letter in connection with his bail application given the fact that he has been charged with a serious crime and will shortly appear before your Honor's court to argue for bail. I believe that Konstantin, as a reliable member of the community, is not a flight risk and he will put all of his dedication to fighting this case and clear his name and reputation.

Sincerely,

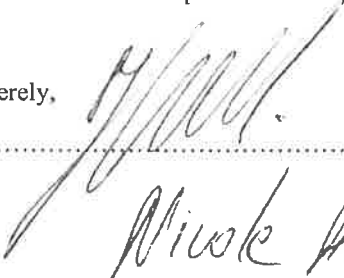

.....
Nicole Atanasova

EXHIBIT 21

Tsvetomira Diklyovski

Mob. +359 897 252664
Sofia, Bulgaria
Email: cvetomira.k@abv.bg

April 9, 2019
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Dear Hon. Judge Ramos,

My name is Tsvetomira Diklyovski and I am appealing to you for my cousin Konstantin Ignatov bail application. I have missed him in my childhood as we grew in different country but we met at teenagers. He became a close and trusted friend of mine helping me with many of my life choices. I fully understand how serious crimes he is being charged with and I am sure there is no risk for him to jump bail. I think that this situation is result of misunderstanding.

Sincerely yours,
Tsvetomira Diklyovski



EXHIBIT 22

A: 45 Dimitar Vechev Str.
Novi Iskar, Bulgaria
M: +359888009028

10 * April 2019

To:
Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

My name is Rumen Mitkov Dimitrov and I consider myself as a very close friend of Konstantin. Me and my brother Rosen are professional Sambo athletes and we run a martial arts gym. I first met Konstantin when he visited a class to watch how we are practicing. It was curious he had brought his dog with him and even more interesting that next times he came to practice with us, he was always with a dog but a different one! It turned out these dogs, all seven of them, were all rescued by him and whenever he can, he brings at least one of them wherever he goes. This was not corresponding to Konstantin's looks, as he looked like a very tough guy, but as it turned out he was very compassionate. I was curious if he was one of the people that just starts training something and would quickly give up. He turned out to be very consistent and passionate about training and showed great character, as well. Our relationship grew quickly into a great friendship. We spend family holidays together and he is with me and brother supporting us in very important or difficult times for us. I appreciate what a dedicated person and friend he is and I look up to him a lot, as he is always being a great example for dignity, honesty and reliability. This is why when I read all that I could find in the media about the case against him, I do not believe that Konstantin has something to do with this. I will keep stating that he is not guilty on the charges against him and I am sure that his innocence will be proved in court. He is an amicable and peace-loving person and I hope he will also be granted a conditional release, so that he is not detained together with people that may be not so amicable and good-tempered like him. Konstantin is a very proud man and I have no doubt he will appear in court when required in order to clean up his name.

Sincerely,



Rumen Mitkov Dimitrov

A. 65 Dundas Voucher St.
Abou Jalal, Belgium
42 +32988606000

12th April 2018

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Hon. Eduardo Ramirez
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Your Honor,

My name is Rumen Mikov Dimitrov and I consider myself as a very close friend of Konstantin. Me and my brother Rumen are professional tennis athletes and we run a married firm together. I first met Konstantin when he called a clerk to watch how we are practicing. It was obvious he had brought his dog with him and even more interesting that most times he came to practice with us he was always with a dog but a different one! It turned out these dogs, all seven of them, were all rescued by him and whenever he can, he brings at least one of them whenever he goes. This was not corresponding to Konstantin's looks, as he looked like a very tough guy, but as it turned out he was very compassionate. I was curious if he was one of the people that just starts training something and would quickly give up. He turned out to be very consistent and passionate about training and showed great character, as well. Our relationship grew quickly into a great friendship. We spend family holidays together and he is with me and brother supporting us in very important or difficult times for us. I appreciate what a dedicated person and friend he is and I look up to him a lot, as he is always being a great example for dignity, honesty and reliability. This is why when I read all that I could find in the media about the case against him, I do not believe that Konstantin has something to do with this. I will keep stating that he is not guilty on the charges against him and I am sure that his innocence will be proved in court. He is an amiable and peace-loving person and I hope he will also be granted a conditional release, so that he is not detained together with people that may be not so amiable and good-hearted like him. Konstantin is a very proud man and I have no doubt he will appear in court when required in order to clear up his name.

Sincerely,


Rumen Mikov Dimitrov

EXHIBIT 23

Dr. Todor K. Gounev
Teaching Professor

Telephone: (816) 235-2294
E-mail: gounevt@umkc.edu

April 17, 2019

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

RE: Konstantin Ignatov

I am pleased to write this letter in support of Konstantin Ignatov's bail application. I am a Teaching Professor in the Chemistry Department at the University of Missouri-Kansas City (UMKC). I have been working at UMKC since 1995. I know of Konstantin through my daughter, Kristina Gouneva. Konstantin and Kristina have been dating for almost a year now, and have become very close. My impressions of Konstantin are based on my conversations with Kristina about their relationship. She tells me that he is a motivated, creative and compassionate young man with a strong work ethic. He is also a good, honest and caring individual who wouldn't hesitate to help others in need. I understand that Konstantin has been charged with serious crimes, but he feels that he is innocent, and he is eager to defend his actions in court. I am convinced that Konstantin is not a flight risk, as he strongly believes that his actions in the matter he is accused of were appropriate and lawful, and his idealistic nature and honesty will drive him to fight this case, prove his innocence and defend his reputation. For this reason, I believe that Konstantin should be afforded a bail. Please do not hesitate to contact me if you have any further questions. My phone number is (816) 235-2294 and my e-mail address is: gounevt@umkc.edu.

Sincerely,



Todor K. Gounev, Ph.D.
Teaching Professor of Chemistry