

UNITED STATES DISTRICT COURT

for the

District of Delaware

United States of America)

v.)

Robert L. Higgins)

Case No.

23-263M

) REDACTED

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 20, 2023 and May 15, 2023 in the county of New Castle in the District of Delaware, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1621	Perjury
18 U.S.C. § 1623	False Declaration Before Court
18 U.S.C. § 1512(b)(1) & (b)(2)	Attempted Witness Intimidation

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Antonio Lo Piccolo

Complainant's signature

SA Antonino Lo Piccolo, IRS-CI

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed R. Crim. P.4.1 and 4(d).

Date: 06/10/2023

Sherry R. Fallon

Judge's signature

City and state: Wilmington, Delaware

Hon. Sherry R. Fallon, U.S. Magistrate Judge

Printed name and title