

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.
Ahmmed Bamidele Ponle

Case No. 20-2083 (JS)

Defendant(s)

CRIMINAL COMPLAINT

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 in or about 6/2016 through 3/2020 in the county of Camden and Mercer in the
District of New Jersey, the defendant(s) violated:

Code Section 18 U.S.C. § 1349 Offense Description Conspiracy to commit bank fraud. (See Attachment A.)

This criminal complaint is based on these facts:

See Attachment B, Affidavit of probable cause.

Continued on the attached sheet.

Michael Durocher

Complainant's signature

Michael R. Durocher, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/24/2020

Joel Schneider

Judge's signature

City and state: Camden, NJ

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: *s/PATRICK C. ASKIN*
 PATRICK C. ASKIN, AUSA

Date: June 24, 2020

Attachment A

(Conspiracy to Commit Bank Fraud)

From in or about June 2016 through in or about March 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

AHMED BAMIDELE PONLE

did knowingly and intentionally conspire and agree with co-conspirators, and with others, known and unknown, to devise a scheme and artifice to defraud a financial institution, namely TD Bank and other victim banks, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Victim Bank # 1 and other victim banks, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344, as described in Attachment B.

In violation of Title 18, United States Code Section 1349.

ATTACHMENT B

I, Michael Durocher, am a United States Postal Inspector assigned to the Philadelphia Division of the United States Postal Inspection Service (USPIS), have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation, as well as upon information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a Criminal Complaint against Ahmmed PONLE (hereafter "PONLE"), I have not necessarily included each and every fact known to the Government concerning this investigation.

1. On or about August 16, 2017, a Victim Bank 1 Investigator contacted the USPIS concerning several bank accounts that were closed by Victim Bank 1 due to suspected fraudulent activity. A Victim Bank 1 representative made USPIS aware the accounts were opened using suspected fraudulent foreign passports and visas at Victim Bank 1 branches located in New Jersey and Pennsylvania. After the accounts were opened, the accounts had minimal activity during the first two months. Any initial activity consisted of Western Union, MoneyGram, US Postal money orders, or cash deposits. After the two-month period, individuals deposited large business checks into the account and quickly withdrew the funds either by ATM withdrawals or by purchasing money orders at various money order vendors such as grocery and discount stores. Shortly after the checks were deposited, Victim Bank 1 began to receive

claims stating the checks were stolen and the payee section was altered to show someone that was not intended to receive the check. Although the payee on the check was altered, the amount on the check was not changed. By October 2017, this affiant identified over thirty (30) fraudulent accounts with a total exposure of approximately \$800,000 to several financial institutions.

2. In the initial stages of the investigation, this affiant discovered at least twenty seven (27) fraudulent bank accounts that were opened between July 2016 and March 2017. The accounts were opened at numerous financial institutions in the state of New Jersey under the assumed names of Wunmi Akrana, Emanuel Kuti, Olawale Johnson, Steven Akpan, Olawole Adefarasin, and Anthony Tunde Camara. In addition, law enforcement identified Co-Conspirator 1 as the individual that opened the Olawale Johnson and Anthony Tunde Camara accounts. As the investigation progressed and additional fraudulent accounts were identified, law enforcement discovered the pattern of activity moved from New Jersey to Pennsylvania, Rhode Island, and Maryland.

3. Between September 13, 2017 and September 14, 2017, this affiant contacted the payer on several checks suspected of being altered and deposited into accounts that were closed by the bank for suspected fraud. The interviews confirmed the payee's name was altered on all of the checks to reflect the name used on a fraudulent account. The accounts to which these checks were deposited were opened in the assumed names of Solomon Henry, Moussa Johnson Traore, Rasheed Williams, Banji Aiwanfo, and John Anoliefo.

4. This affiant examined the bank accounts referenced in paragraph 3 and discovered the accounts were opened using foreign passports, each containing United States Visas, which were believed to be counterfeit.

5. On or about November 17, 2017, this affiant met with Department of State - Diplomatic Security Service (DSS) to discuss the passports and United States Visas used to open the fraudulent bank accounts. A Special Agent (SA) from DSS confirmed the passports and United States Visas were counterfeit and the identifiers on the documents did not match any Consular records in the Department of State's systems.

6. On or about June 27, 2019, USPIS, HSI, and DSS conducted surveillance at the 119 E Providence Rd, Lansdowne, PA (hereafter "MURITALA RESIDENCE"). Law enforcement observed a black Toyota sedan bearing Pennsylvania registration KXZ9488 park outside of the MURITALA RESIDENCE. The driver, later identified as PONLE, made contact with Co-Conspirator 4 on the front lawn of the MURITALA RESIDENCE and then walked back to the black Toyota sedan. Further checks with the Pennsylvania DMV identified the registered owner as PONLE of 131 Golf Rd, Darby, PA (hereafter "PONLE RESIDENCE"). Law enforcement recovered an image of PONLE from his Pennsylvania driver's license and matched it to transaction activity for several fraudulent accounts.

7. While conducting further research on PONLE, law enforcement discovered that HSI Forensic Lab was in possession of a seizure containing two (2) fraudulent West African passports that were intercepted by CBP in April

2018. PONLE's image was on both West African passports. The documents are detailed below:

- a) Kenyan passport (A300128) using the name Quam Olaoluwa Gassama with counterfeit US Visa number 2017024180011. The true identity depicted in this passport has been confirmed as PONLE.
- b) Senegal passport (A02104825) using the name Moussa Aliou Kadhim with counterfeit US Visa number 2017013820029. The true identity depicted in this passport has been confirmed as PONLE.

8. After PONLE was identified, law enforcement reviewed the data from the (3) cellphones that was imaged and seized on February 3, 2019. Law enforcement discovered an email that showed Co-Conspirator 1 designated PONLE as the beneficiary for Co-Conspirator 1's Guaranty Bank account. Two additional emails showed money transfers from Co-Conspirator 1's Guaranty Bank account into PONLE's Guaranty Bank account. Guaranty Bank is a Nigerian based financial institution.

9. On April 22, 2020, HSI conducted surveillance on the MURITALA RESIDENCE. During the surveillance, law enforcement observed Co-Conspirator 4 exit the MURITALA RESIDENCE and drive away in a Toyota Highlander. Law enforcement followed Co-Conspirator 4 to the Snapbox Self Storage facility located at 2240 Island Avenue, Philadelphia, PA 19142. Co-Conspirator 4

entered the front gate of the facility at approximately 12:45pm. Co-Conspirator 4 exited the facility at approximately 12:56pm.

10. On May 26, 2020, this affiant received a report from Snapbox of all individuals that accessed the Snapbox Self Storage facility on April 22, 2020. The report showed on April 22, 2020 at 12:45pm, an individual by the name of Michael Houle entered the facility. This affiant reviewed the customer application for Michael Houle and identified the name and identifiers used to open the Snapbox account were the same identifiers used to open fraudulent bank accounts under the same name in this investigation. In addition, the Snapbox application for Michael Houle included an image of the Kenyan passport used to open the account. PONLE's image was on the passport. Furthermore, PONLE opened fraudulent bank accounts using the aforementioned Kenyan passport at Victim Bank 1, Victim Bank 3, Victim Bank 4, and Victim Bank 6 between May 15, 2017 and May 26, 2017 for an estimated exposure of \$47,178.96. The Michael Houle Snapbox account was opened on June 23, 2017.

11. From on or about November 23, 2016 through March 29, 2019, bank records revealed PONLE opened approximately nine (9) accounts under the assumed name Stephen Snow, eight (8) accounts under the assumed name Macheal Kurum, six (6) accounts under the assumed name Moussa Traore, eight (8) accounts under the assumed name Boubou Niakate, four (4) accounts under the assumed name Michael Houle, six (6) accounts under the assumed name Jasper Darrell, one (1) account under the assumed name Emeka

Ayanyinka, three (3) accounts under the assumed name Olaribigbe Niakate, seven (7) accounts under the assumed name Kuponu Suszy, six (6) accounts under the assumed name Ebele Johnson, seven (7) accounts under the assumed name Alassane Mbaye, three (3) accounts under the assumed name Chuks Godwin, three (3) accounts under the assumed name of Olajimi Moyo, one (1) account under the assumed name of David Akinyi, one (1) account under the assumed name of Luis Thompson, and one (1) account under the assumed name of Owoola Agada for an estimated intended loss of \$1,113,061.66. PONLE utilized fictitious West African passports in these assumed names bearing his image to open the accounts. This affiant obtained copies of the above passports and video footage from the banks, which showed PONLE as the individual that opened the accounts. The accounts are listed below:

<u>Date of Account Opening</u>	<u>Bank</u>	<u>Account Numbers</u>	<u>Amount</u>	<u>Assumed Name</u>
11/23/2016	Victim Bank 1	X9031, X4498	\$25,764.14	Stephen Snow
11/25/2016	Victim Bank 2	X3337	\$22,015.21	Stephen Snow
11/25/2016	Victim Bank 6	X2522	\$24.95	Stephen Snow
11/25/2016	Victim Bank 4	X6604, X1563	\$23,542.66	Stephen Snow
11/28/2016	Victim Bank 7	X5223	\$0.00	Stephen Snow
11/28/2016	Victim Bank 5	X8686, X9624	\$18,715.25	Stephen Snow

12/19/2016	Victim Bank 1	X2155	\$12,926.68	Macheal Kurum
12/20/2016	Victim Bank 4	X8312	\$43,363.07	Macheal Kurum
12/20/2016	Victim Bank 3	X0694, X0707, X0715	\$49,910.26	Macheal Kurum
12/21/2016	Victim Bank 5	X3983	\$9,585.95	Macheal Kurum
12/21/2016	Victim Bank 2	X0425	\$14,576.82	Macheal Kurum
2/4/2017	Victim Bank 6	X1788	\$9,913.52	Macheal Kurum
4/19/2017	Victim Bank 1	X4575, X7512	\$50,270.61	Moussa Traore
4/20/2017	Victim Bank 2	X5053, X5066	\$26,389.01	Moussa Traore
4/21/2017	Victim Bank 4	X1741, X8562	\$12,077.34	Moussa Traore
5/10/2017	Victim Bank 1	X2273	\$17,971.77	Boubou Niakate
5/10/2017	Victim Bank 4	X1724	\$0.00	Boubou Niakate
5/15/2017	Victim Bank 1	X4000	\$20,999.39	Michael Houle
5/17/2017	Victim Bank 5	X4968	\$10,440.52	Boubou Niakate
5/17/2017	Victim Bank 3	X2085, X2093, X0106	\$7,608.00	Boubou Niakate
5/24/2017	Victim Bank 3	X5785	\$8,718.21	Michael Houle
5/24/2017	Victim Bank 6	X6742	\$28.50	Michael Houle
5/26/2017	Victim Bank 6	X8754, X8746	\$18.96	Boubou Niakate

5/26/2017	Victim Bank 4	X5964	\$17,432.86	Michael Houle
5/30/2017	Victim Bank 1	X4262	\$10,683.75	Jasper Darrell
5/30/2017	Victim Bank 4	X9314	\$9,721.98	Jasper Darrell
5/31/2017	Victim Bank 5	X4777	\$9,598.54	Jasper Darrell
5/31/2017	Victim Bank 3	X9864	\$8,277.00	Jasper Darrell
5/31/2017	Victim Bank 6	X9111	\$13.44	Jasper Darrell
6/6/2017	Victim Bank 1	X0778	\$0.00	Emeka Ayanyinka
10/9/2017	Victim Bank 1	X8991, X4593	\$65,518.62	Kuponu Suszy
10/11/2017	Victim Bank 2	X8751	\$31,564.36	Kuponu Suszy
10/11/2017	Victim Bank 4	X6028	\$30,431.11	Kuponu Suszy
10/31/2017	Victim Bank 1	X9237	\$58,025.00	Olaribigbe Niakate
10/31/2017	Victim Bank 2	X8204	\$19,020.65	Olaribigbe Niakate
11/1/2017	Victim Bank 4	X8808	\$9,367.08	Olaribigbe Niakate
12/4/2017	Victim Bank 3	X9689, X9697, X9718	\$8,820.00	Kuponu Suszy
4/6/2018	Victim Bank 9	X2802	\$19,144.51	Jasper Darrell
5/29/2018	Victim Bank 1	X7395	\$0.00	Alassane Mbaye
5/29/2018	Victim Bank 3	X1629, X1637, X1645	\$0.00	Alassane Mbaye

6/5/2018	Victim Bank 1	X7557	\$19,176.59	Ebele Johnson
6/5/2018	Victim Bank 4	X53154	\$56,701.85	Ebele Johnson
6/5/2018	Victim Bank 3	X0025, X0033, X0041	\$28,454.28	Ebele Johnson
6/7/2018	Victim Bank 2	X8013	\$20,500.83	Ebele Johnson
6/9/2018	Victim Bank 4	X3099	\$49,836.72	Alassane Mbaye
6/20/2018	Victim Bank 2	X5864	\$22,561.32	Alassane Mbaye
8/2/2018	Victim Bank 10	X8440	\$10,454.14	Alassane Mbaye
12/27/2018	Victim Bank 1	X9782	\$8,340.69	Chuks Godwin
12/27/2018	Victim Bank 4	X3455	\$9,872.36	Chuks Godwin
12/28/2018	Victim Bank 2	X8806	\$21,992.27	Chuks Godwin
3/15/2019	Victim Bank 1	X2364	\$12,682.00	Olajimi Moyo
3/29/2019	Victim Bank 2	X5995	\$50,944.80	Olajimi Moyo
3/29/2019	Victim Bank 4	X0830	\$30,289.08	Olajimi Moyo
10/28/2019	Victim Bank 1	X9178	\$34,165.94	David Akinyi
11/29/2019	Victim Bank 1	X8898 ¹	\$27,036.45	Luis Thompson
12/19/2019	Victim Bank 1	X9304	\$27,572.62	Owoola Agada

¹ Although Victim Bank 1 account X8898 was opened in Pennsylvania, several transaction occurred in New Jersey before the account was closed.

Furthermore, law enforcement obtained images provided by the banks of PONLE conducting approximately \$550,579.89 worth of transactions on the following additional fraudulent accounts:

<u>Date</u>	<u>Bank</u>	<u>Type of Transaction</u>	<u>Amount</u>	<u>Assumed Name</u>
3/13/2017	Victim Bank 1	Deposit	\$9,108.40	Solomon Henry
3/27/2017	Victim Bank 1	Deposit	\$7,808.17	Solomon Henry
4/3/2017	Victim Bank 1	Deposit	\$11,645.45	Solomon Henry
5/30/2017	Victim Bank 1	Opening		John O Anoliefo
5/30/2017	Victim Bank 1	Deposit	\$50.00	John O Anoliefo
7/4/2017	Victim Bank 1	Deposit	\$1,000.00	Matthew Saliger
7/21/2017	Victim Bank 1	Deposit	\$1,000.00	Matthew Saliger
7/24/2017	Victim Bank 1	Withdrawal	\$700.00	Matthew Saliger
8/2/2017	Victim Bank 1	Withdrawal	\$700.00	Alex Tourey
8/8/2017	Victim Bank 1	Deposit	\$7,547.94	Matthew Saliger
10/10/2017	Victim Bank 1	Deposit	\$40.00	Benjamin Anton
12/10/2017	Victim Bank 1	Deposit	\$9,576.24	Benjamin Anton
12/19/2017	Victim Bank 1	Deposit	\$10,739.11	Benjamin Anton

1/3/2018	Victim Bank 1	Deposit	\$8,345.13	Benjamin Anton
2/1/2018	Victim Bank 1	Withdrawal	\$700.00	Bryan Rasheed Lander
2/2/2018	Victim Bank 1	Deposit	\$11,935.32	Bryan Rasheed Lander
3/15/2018	Victim Bank 4	Deposit	\$500.00	Anthony Camara
3/16/2018	Victim Bank 1	Deposit	\$300.00	Anthony Niakate Camara
3/16/2018	Victim Bank 4	Withdrawal	\$300.00	Anthony Camara
3/22/2018	Victim Bank 4	Withdrawal	\$300.00	Anthony Camara
3/23/2018	Victim Bank 4	Deposit	\$998.00	Anthony Camara
3/24/2018	Victim Bank 4	Withdrawal	\$300.00	Anthony Camara
3/28/2018	Victim Bank 4	Withdrawal	\$300.00	Anthony Camara
4/1/2018	Victim Bank 1	Deposit	\$200.00	Anthony Niakate Camara
4/9/2018	Victim Bank 1	Deposit	\$9,932.20	Anthony Niakate Camara
4/11/2018	Victim Bank 4	Deposit	\$1,000.00	Anthony Camara
4/20/2018	Victim Bank 4	Deposit	\$10,420.50	Anthony Camara
4/20/2018	Victim Bank 4	Withdrawal	\$300.00	Anthony Camara
4/21/2018	Victim Bank 4	Withdrawal	\$300.00	Anthony Camara
4/22/2018	Victim Bank 4	Withdrawal	\$300.00	Anthony Camara

4/23/2018	Victim Bank 4	Withdrawal	\$300.00	Anthony Camara
5/30/2018	Victim Bank 1	Deposit	\$100.00	Youssou Kuponu
5/31/2018	Victim Bank 1	Deposit	\$100.00	Godgift Dokubo Sokenu
8/4/2018	Victim Bank 1	Deposit	\$1,000.00	Youssou Kuponu
8/4/2018	Victim Bank 1	Deposit	\$540.00	Godgift Dokubo Sokenu
8/4/2018	Victim Bank 1	Deposit	\$460.00	Godgift Dokubo Sokenu
8/10/2018	Victim Bank 1	Deposit	\$1,000.00	Youssou Kuponu
8/10/2018	Victim Bank 1	Deposit	\$1,000.00	Godgift Dokubo Sokenu
8/14/2018	Victim Bank 1	Withdrawal	\$700.00	Youssou Kuponu
8/14/2018	Victim Bank 1	Withdrawal	\$300.00	Godgift Dokubo Sokenu
8/17/2018	Victim Bank 1	Withdrawal	\$400.00	Youssou Kuponu
8/18/2018	Victim Bank 1	Withdrawal	\$400.00	Youssou Kuponu
8/18/2018	Victim Bank 2	Deposit	\$500.00	Youssou Xadim Kuponu
8/24/2018	Victim Bank 1	Deposit	\$500.00	Godgift Dokubo Sokenu
8/26/2018	Victim Bank 1	Deposit	\$11,840.00	Youssou Kuponu
8/26/2018	Victim Bank 1	Deposit	\$11,621.42	Godgift Dokubo Sokenu
8/28/2018	Victim Bank 1	Withdrawal	\$700.00	Youssou Kuponu

8/29/2018	Victim Bank 1	Withdrawal	\$5,000.00	Youssou Kuponu
8/29/2018	Victim Bank 1	Withdrawal	\$200.00	Godgift Dokubo Sokenu
8/30/2018	Victim Bank 1	Withdrawal	\$700.00	Youssou Kuponu
8/31/2018	Victim Bank 1	Withdrawal	\$1,400.00	Youssou Kuponu
8/31/2018	Victim Bank 2	Deposit	\$9,147.33	Youssou Xadim Kuponu
9/5/2018	Victim Bank 1	Deposit	\$9,471.00	Youssou Kuponu
9/5/2018	Victim Bank 1	Withdrawal	\$700.00	Godgift Dokubo Sokenu
9/5/2018	Victim Bank 2	Withdrawal	\$800.00	Youssou Xadim Kuponu
9/6/2018	Victim Bank 1	Withdrawal	\$700.00	Youssou Kuponu
9/7/2018	Victim Bank 1	Withdrawal	\$700.00	Youssou Kuponu
9/7/2018	Victim Bank 1	Withdrawal	\$700.00	Godgift Dokubo Sokenu
9/8/2018	Victim Bank 1	Withdrawal	\$700.00	Godgift Dokubo Sokenu
9/8/2018	Victim Bank 2	Withdrawal	\$800.00	Youssou Xadim Kuponu
9/9/2018	Victim Bank 2	Withdrawal	\$500.00	Youssou Xadim Kuponu
9/11/2018	Victim Bank 1	Withdrawal	\$700.00	Godgift Dokubo Sokenu
9/12/2018	Victim Bank 2	Withdrawal	\$800.00	Youssou Xadim Kuponu
9/13/2018	Victim Bank 2	Withdrawal	\$800.00	Youssou Xadim Kuponu

9/15/2018	Victim Bank 2	Withdrawal	\$800.00	Youssou Xadim Kuponu
9/17/2018	Victim Bank 2	Deposit	\$11,136.00	Youssou Xadim Kuponu
1/31/2019	Victim Bank 1	Deposit	\$1,000.00	Amos Atere
2/27/2019	Victim Bank 1	Deposit	\$8,315.00	Amos Atere
2/28/2019	Victim Bank 1	Withdrawal	\$700.00	Amos Atere
3/1/2019	Victim Bank 1	Withdrawal	\$700.00	Amos Atere
3/2/2019	Victim Bank 1	Withdrawal	\$700.00	Amos Atere
3/3/2019	Victim Bank 1	Withdrawal	\$200.00	Amos Atere
3/10/2019	Victim Bank 1	Deposit	\$8,858.64	Amos Atere
3/12/2019	Victim Bank 1	Withdrawal	\$700.00	Amos Atere
6/27/2019	Victim Bank 2	Withdrawal	\$800.00	Hayford Momodu
7/15/2019	Victim Bank 2	Deposit	\$10,468.50	Hayford Momodu
7/25/2019	Victim Bank 2	Withdrawal	\$680.00	Hayford Momodu
7/30/2019	Victim Bank 2	Deposit	\$11,492.87	Hayford Momodu
7/31/2019	Victim Bank 1	Deposit	\$18,343.47	Hayford Momodu
9/9/2019	Victim Bank 1	Deposit	\$1,300.00	Touray Sillah
9/11/2019	Victim Bank 1	Deposit	\$9,939.77	Touray Sillah

10/23/2019	Victim Bank 1	Deposit	\$18,371.49	Dike Otiri
10/30/2019	Victim Bank 1	Deposit	\$10,620.00	Isreal Edward
10/30/2019	Victim Bank 1	Deposit	\$28,992.50	Peter Oghre
11/5/2019	Victim Bank 1	Deposit	\$21,567.48	Williams Ogutuga
11/5/2019	Victim Bank 1	Deposit	\$47,914.14	Dike Otiri
11/13/2019	Victim Bank 1	Deposit	\$39,300.00	Isreal Edward
12/5/2019	Victim Bank 1	Deposit	\$11,156.25	Williams Ogutuga
12/18/2019	Victim Bank 1	Deposit	\$16,500.00	Williams Ogutuga
1/11/2020	Victim Bank 1	Deposit	\$500.00	Owoola Agada
2/3/2020	Victim Bank 1	Deposit	\$5,000.00	Luis Thompson
2/11/2020	Victim Bank 1	Deposit	\$16,895.00	Luis Thompson
2/12/2020	Victim Bank 1	Deposit	\$34,165.94	David Akinyi
2/12/2020	Victim Bank 1	Deposit	\$16,417.62	Owoola Agada
2/26/2020	Victim Bank 1	Deposit	\$11,155.00	Owoola Agada
3/21/2020	Victim Bank 1	Withdrawal	\$500.00	Gregory Paul
3/25/2020	Victim Bank 1	Deposit	\$13,064.01	Gregory Paul
3/26/2020	Victim Bank 1	Withdrawal	\$700.00	Gregory Paul

12. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that from in or about June 2016 to in or about March 2020, in the District of New Jersey and elsewhere, PONLE conspired and agreed, with others, known and unknown to the United States, to commit bank fraud, contrary to Title 18, United States Code, Section 1344, in violation of Title 18, United States Code, Section 1349.

13. To date, the investigation has revealed that the full extent of the criminal activity identified thus far involves approximately four hundred seventy (470) fraudulent bank accounts with an estimated exposure of \$5.7 million. PONLE conspired with individuals both known and unknown to commit the federal offenses outlined in the aforementioned paragraph.

Michael Durocher

Michael R. Durocher
U.S. Postal Inspector

Pursuant to F.R.Crim.P. 4.1, U.S. Postal Inspector Durocher was sworn and attested to the contents of this affidavit in support of the complaints.

Joel Schneider
HONORABLE JOEL SCHNEIDER
United States Magistrate Judge

Date: June 24, 2020