UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

v.

Hon. Mark Falk

RONNIE MAGREHBI

Mag. No. 20-1145

CRIMINAL COMPLAINT

I, Bryan DeBon, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Secret Service, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

Bryan DeBon, Special Agent United States Secret Service

Special Agent DeBon attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A) on September 25, 2020 in the District of New Jersey

HONORABLE MARK FALK UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE (Conspiracy to Commit Wire Fraud)

From in or around May 2018 through in or around June 2018, in Bergen County, in the District of New Jersey and elsewhere, defendant

RONNIE MAGREHBI

did knowingly and intentionally conspire with others to devise and intend to devise a scheme and artifice to defraud individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1349 and 2.

COUNT TWO (Conspiracy to Commit Computer Fraud and Abuse)

From in or around May 2018 through in or around June 2018, in the District of New Jersey and elsewhere, defendant

RONNIE MAGREHBI

did knowingly and intentionally conspire with others to commit computer fraud and abuse, namely,

- (1) to intentionally access a computer without authorization and to exceed authorized access, and thereby obtain information from any protected computer, for purposes of commercial advantage and private financial gain, contrary to Title 18, United States Code, Section 1030(a)(2)(C) and (c)(2)(B)(i); and
- (2) with intent to extort from any person any money and other thing of value, to transmit in interstate and foreign commerce any communication containing any demand and request for money and other thing of value in relation to damage to a protected computer, where such damage was caused to facilitate the extortion, contrary to Title 18, United States Code, Section 1030(a)(7)(C) and (c)(3)(A).

In violation of Title 18, United States Code, Sections 371 and 2.

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ATTACHMENT B

I, Bryan DeBon, being first duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a Special Agent with the United States Secret Service ("USSS" or "Secret Service"), and have been so employed since July 2017. I am authorized and have received training to investigate violations of the laws of the United States, and to execute warrants under the authority of the United States. I received criminal investigative training at the Federal Law Enforcement Training Center in Glynco, Georgia, and at the James J. Rowley Secret Service Training Center in Beltsville, Maryland. My training and experience as a Secret Service agent has included the investigation of cases involving counterfeit currency, bank fraud, money laundering, wire fraud, access device fraud, and identity theft. During my employment with the USSS, I have participated in investigations resulting in the seizures of criminally derived property.
- 2. This Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a federal criminal complaint and arrest warrant. Accordingly, I have not included each and every fact known by the Government concerning this investigation. Except as otherwise indicated, the actions, conversations, and statements of others identified in this Affidavit even where they appear in quotations are reported in substance and in part. Similarly, dates and times are approximations, and should be read as "on or about," "in or about," or "at or about" the date or time provided. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents.

BACKGROUND

- 3. At various times relevant to this Complaint:
 - A. The defendant, Ronnie Magrehbi ("MAGREHBI") was a resident of Florida;
 - B. "Victim-1" was a professional football player, who was employed by a National Football League ("NFL") franchise, and was living in New Jersey;

FACTS SUPPORTING PROBABLE CAUSE

4. The operators of a social media and email account hacking scheme, including MAGHREHBI, targeted semi-professional and professional athletes across the United States, including Victim-1. As part of the scheme, MAGREHBI and others gained unauthorized access to the social

media and email accounts of the victim-athletes and used or attempted to use that access for their personal financial gain, including by selling access to others who would further exploit the compromised accounts or through extortion of the victim-athletes.

- 5. Between on or about May 27, 2018 and on or about May 30, 2018, Victim-1 received a direct message on his Instagram account (the "Victim-1 Instagram Account") from an unknown account that contained a clickable link to a Facebook site that purported to solicit community support from professional athletes. Victim-1 used his personal cell phone to click on the link, which brought him to what he believed was a Facebook login page (the "Bogus Facebook Page"). Following instructions on the Bogus Facebook Page, Victim-1 entered his Facebook user name and password. Shortly after entering this data, Victim-1 was locked out of multiple of his accounts on social media platforms, including, Facebook, Twitter, Instagram, and Snapchat.
- 6. Approximately five days after the above incident, Victim-1 received a phone call from two individuals (the "Subjects") using a phone number ending in 9888 (the "9888 Number"). The Subjects told Victim-1 that they had purchased Victim-1's login credentials for the Victim-1 Instagram Account and Victim-1's Snapchat account (the "Victim-1 Snapchat Account"), altered the passwords for the accounts, and demanded payment from Victim-1 in return for the altered passwords. The Subjects instructed Victim-1 to send \$500 to a Venmo account with the user name "Michael-Gautier-1" (the "Gautier Venmo Account").
- 7. On or about June 1, 2018, Victim-1 sent \$500 to the Gautier Venmo Account in two separate \$250 transfers at 9:05 p.m. and 9:09 p.m., respectively. At 9:15 p.m., the Gautier Venmo Account transferred \$350 to a Venmo account with the user name "Ronnie-Magrehbi," subscribed to by MAGREHBI (the "MAGREHBI Venmo Account"). The \$350 was then credited to a bank account held by MAGREHBI at Wells Fargo Bank.
- 8. Shortly after Victim-1 transferred the funds to the Gautier Venmo Account, the Subjects provided Victim-1 with a password via text message. Using the password, Victim-1 briefly gained access to the Victim-1 Snapchat Account but, after attempting to reset the password, was logged out of the account and denied further access. During the brief period during which Victim-1 was able to access the Victim-1 Snapchat Account, Victim-1 observed that the account was showing a location of Groveland, Florida. As set forth below, MAGREHBI was known to reside in Groveland, Florida during the time period relevant to this Complaint. Victim-1 also found that he was denied access to other of his social media accounts.
- 9. On or about June 3, 2018, Victim-1 was advised by email by Yahoo, Inc. ("Yahoo") that changes had been made to his Yahoo email account (the

"Victim-1 Yahoo Account"), including that the 9888 Number was designated as the phone number associated with the account. Victim-1 did not make or authorize the changes to the Victim-1 Yahoo Account. Shortly thereafter, Victim-1 found that he was locked out of the Victim-1 Yahoo Account.

- 10. According to Yahoo records, the email account bigrolllex@gmail.com (the "Big Rolllex Google Account") also was added to the Victim-1 Yahoo Account following its takeover. The Big Rolllex Google Account was subscribed to by MAGREHBI and listed rkgpromos@gmail.com (the "Rkgpromos Google Account") as a recovery email account.
- 11. According to records provided by Facebook, the parent company for Instagram, the Big Rolllex Google Account also was added to the Victim-1 Instagram Account. Additionally, a phone number ending in 8480 (the "8480 Number") was also added to the Victim-1 Instagram Account following its takeover. The 8480 number is subscribed to by MAGREHBI at the Groveland Address.
- 12. A review of IP login information associated with the Victim-1 Yahoo Account revealed that IP Address 184.89.195.130 (the "130 IP Address") logged into the Victim-1 Yahoo Account on several occasions between June 2, 2018 and June 5, 2018, during the time of the account takeover described above.
- 13. According to records provided by the internet service provider associated with the 130 IP Address, the 130 IP Address is subscribed to by an individual with the last name "Magrehbi" ("Subscriber Magrehbi") at a residential address in Groveland, Florida (the "Groveland Address"). Based on this investigation, I am aware that Subscriber Maghrebi is a relative of MAGREHBI. At the time, MAGREHBI also resided at the Groveland Address.
- 14. According to Yahoo records, on or about June 3, 2018, the 130 IP Address was used to log in to the email account ronniemag171@yahoo.com (the "MAGREHBI Email Account"). The MAGREHBI Email Account is subscribed to by MAGREHBI and lists an alternative email address of ronniemagrehbi@gmail.com.
- 15. On or about June 4, 2018, the 130 IP Address was also used to log in to the MAGREHBI Venmo Account.
- 16. A review of the MAGREHBI Email Account revealed the following:
 - A. On or about June 4, 2018, during the time of the account takeover, the MAGREHBI Email Account sent an email to a third party, which stated: "[h]ello, my name is Ronnie Magrehbi & I have some questions regarding your services. Please give me a call at [the 9888 Number]." As referenced previously, the 9888

- Number was used to call Victim-1 following the account takeover and was later added to the Victim-1 Yahoo Account.
- B. In or around January 2018, the MAGREHBI Email Account sent at least two emails to the BigRolllex Google Account. As referenced previously, the BigRolllex Google Account is subscribed to by MAGREHBI and was added to Victim-1's Yahoo and Instagram Accounts following the account takeover described above.
- 17. On or about June 4, 2018, explicit photographs of Victim-1 were posted by the Subjects to Victim-1's Twitter and Instagram accounts.
- 18. Also on or about June 4, 2018, Victim-1 was contacted by the Subjects from a number ending in 0524 (the "0524 Number"). The Subjects instructed Victim-1 to send an additional \$2,500 to the Venmo account @Rolex111 (the "Rolex Venmo Account") and threatened to release additional images and videos of Victim-1 if he did not comply. Victim-1 did not send any additional funds.
- 19. The Rolex Venmo Account was registered on or about May 16, 2018 by MAGREHBI. The original user name for the Rolex Venmo Account was "@ronnie-magrehbil." On or about June 4, 2018, the date the above referenced threat was made to Victim-1, the user name was changed to @rolex111 and the subscriber name was changed from "Ronnie Magrehbi" to "Big Dawg."
- 20. The 0524 Number was associated with a prepaid cell phone. The 0524 Number was registered to an unlisted subscriber on or about June 3, 2018 and was active through on or about June 6, 2018. During that time, the 0524 Number made approximately 20 telephone calls to Victim-1 and sent Victim-1 numerous text messages. Further, on or about June 5, 2018 and June 6, 2018, the 0524 Number made multiple telephone calls to a number ending in 7078 (the "7078 Number"). The 7078 Number is registered to Subscriber Magrehbi at the Groveland Address. As referenced previously, Subscriber Magrehbi is believed to be a relative of MAGHREBI.
- 21. An open-source internet search for the name "Ronnie Magrehbi" revealed an account with SoundCloud, a music and audio streaming service, with the user name "big rollex, ronnie magrehbi." The publicly available website for the SoundCloud account directed visitors to "[f]ollow my Instagram please and support me @BIGROLLEX" (the "BigRollex Instagram Account"). IP login information associated with the BigRollex Instagram Account revealed logins in February 2018 from a location in Clermont, Florida, several minutes' drive from the Groveland Address. Further, the BigRollex Instagram Account listed the Rkgpromos Google Account as a verified email address.