

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

Ali Shoultz

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Case No.

20-mj-2111 (AMD)

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 April 30, 2020 through October 2020 in the county of _____ in the _____ District of New Jersey, the defendant(s) violated:

Code Section

Description of Offenses

18 U.S.C Section 1349

Conspiracy to commit bank fraud.

See Attachment A hereto.

This criminal complaint is based on these facts:

See Attachment B hereto.

Continued on the attached sheet.


Complainant's signature

Luis Santana, Special Agent, H.S.I.

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

_____ telephone _____ (specify reliable electronic means).

Date: 10/19/2020



Judge's signature

City and state: _____ District of New Jersey

Hon. Ann Marie Donio, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

By: 
ALISA SHVER
Assistant U.S. Attorney

Date: October 19, 2020

Attachment A

(Conspiracy to Commit Bank Fraud)

From at least as early as in or about April, 2020 through in or about October, 2020, in the District of New Jersey, and elsewhere, the defendant,

ALI SHOULTZ,

did knowingly and intentionally conspire and agree with others, to devise a scheme and artifice to defraud financial institutions and the United States, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud a financial institution 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, Luis Santana, having conducted an investigation and having spoken with other individuals, have knowledge of the following:

I am a Special Agent with Homeland Security Investigations (“HSI”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, photographs and video recordings of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged. Except as otherwise indicated, statements of others identified in this Affidavit are reported in substance and in part.

At all times relevant herein:

1. Bank of America, Wells Fargo & Company (hereinafter “Wells Fargo”), Capital One Financial Corporation (hereinafter “Capital One”), are “financial institutions” as defined by Title 18, United States Code, Section 20;
2. United States Treasury Checks are “securities” as defined by Title 18, United States Code, Section 513; and
3. All counterfeit United States Treasury Checks described herein bore a likeness or resemblance to a genuine United States Treasury Check, including the color, font, and images printed within the checks.

INVESTIGATION

4. At least as early as April 30, 2020, law enforcement agents learned of a nationwide scheme to defraud financial institutions using forged or counterfeit United States Treasury Checks.

Conspirators involved in the fraud scheme primarily use social media platforms, such as Instagram¹, to recruit individuals to participate. Conspirators recruited both genuine victims, those who unknowingly participated in the fraud scheme, and collusive account holders, those who knowingly participated in the fraud scheme, to provide their debit card, account information, and PIN. Once in possession of this information, conspirators in the scheme deposited counterfeit securities, e.g., U.S. Treasury Economic Impact Payment (“EIP”) checks, into genuine victims’ and collusive account holders’ bank accounts at various financial institutions. Members of the conspiracy deposited the counterfeit securities at various bank branches, ATMs, or through mobile deposits. While the funds remained in the account, and before the individual banks discovered that the securities were counterfeit, co-conspirators used the debit cards to withdraw the funds through ATM withdrawals or peer to peer payment platforms, thus depleting the individual accounts before the banks discovered the fraud. The window of time between the fraudulent deposits and withdrawals was approximately 2-4 days.

5. Members of multiple law enforcement agencies conducted an investigation into the counterfeit U.S. Treasury EIP Checks. This type of U.S. Treasury check was issued as part of the CARES Act.² The counterfeit U.S. Treasury EIP checks involved in this scheme utilized three check numbers with varying payee names and amounts. The EIP check numbers were xxxx-xxxx2999 (hereinafter “Counterfeit EIP Check A”), xxxx-xxxx1970 (hereinafter “Counterfeit EIP Check B”); and

¹ Instagram, also known as “IG” or “Insta,” is a photo and video-sharing social networking service and application owned by Facebook, Inc. The application, sometimes referred to as an “app,” allows users to upload photos and videos to the service, which can be edited with various filters, and organized with tags and location information, and are called “posts.” An account’s posts can be shared publicly or with pre-approved followers.

² The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act, was signed into law on March 27, 2020. It provides for, in pertinent part, up to \$1,200 per adult per household in those American households whose income was less than \$99,000 (or \$198,000 for joint filers) and \$500 per child under 17 years old – or up to \$3,400 for a family of four. Under the CARES Act, these payments are referred to as Economic Impact Payments (EIP). The EIP are issued in the form of United States Treasury checks, direct deposits and prepaid debit cards.

xxxx-xxxx5898 (hereinafter “Counterfeit EIP Check C”). These EIP check numbers are associated with actual U. S. Treasury EIP checks that were issued as part of the CARES Act and are listed below:

- Counterfeit EIP Check A was issued on April 17, 2020 in the amount of \$4,210 payable to C.R. and N.R. residing in Jurupa Valley, California. Counterfeit EIP Check A is still outstanding as of September 8, 2020.
- Counterfeit EIP Check B was issued on April 24, 2020 in the amount of \$1,200 payable to C.A. residing in Cleveland, Ohio. Counterfeit EIP Check B was negotiated at Fifth Third Bank on April 27, 2020.
- Counterfeit EIP Check C was issued on April 28, 2020 in the amount of \$1,200 payable to Takeem Ford residing in Philadelphia, Pennsylvania. Counterfeit EIP Check C was negotiated at J.P. Morgan Chase (“JPMC”) on April 30, 2020

6. Throughout the course of this investigation, investigators identified over 164 counterfeit U.S. Treasury EIP checks deposited into approximately 51 different Bank of America accounts. The loss exposure to Bank of America as a result of these counterfeit deposits is approximately \$320,119.70 with an actual loss of approximately \$213,000.00. Investigators identified collusive account holders in ten different states across the country: New Jersey, New York, Pennsylvania, Connecticut, Maryland, California, Georgia, Tennessee, Texas, and South Carolina.

i. May 1, 2020 Fraudulent Activity – Account Holder “M.J.” and “B.P.”

7. On or about May 1, 2020, Kassin Knight (“KNIGHT”) posted a “story”³ to his Instagram account stating “gang with me @jayyybandzzz__” referring to Justin Ezeiruaku (“EZEIRUAKU”). During this “story,” KNIGHT stated “All OA instant”⁴ (with an arrow pointed to a phone emoji) followed by a video referencing bread⁵ while standing at a drive thru bank ATM lot with another

³ Instagram “stories” are a feature that allow users to take photos, add effects and layers, and add them to a continual series of posts, also called a “story.” Images uploaded to a user’s “story” expire after 24 hours. Instagram account holders can change their displayed name, sometimes referred to as a “vanity name,” at any time on their account while maintaining their unique account identification number. Users can browse other users’ content by tags and locations, and view trending content.

⁴ “OA” and “BOA” refer to Bank of America.

⁵ Bread is a commonly used slang term referring to money.

individual. In the video, law enforcement agents identified EZEIRUAKU as one of the individuals standing with KNIGHT at the ATM drive thru.

8. Subsequent to tagging EZEIRUAKU, and within the same “story,” KNIGHT posted a Bank of America receipt. The receipt showed that \$4,210 was deposited on May 1, 2020, just after midnight, at an ATM in the Hilton Hotel in Maplewood, New Jersey (the “Hilton ATM”). Based on this information, investigators learned that two different Bank of America accounts received counterfeit U.S. Treasury EIP checks, both in the amount of \$4,210.

9. Investigators learned that the account holder for one of the Bank of America accounts tied to the counterfeit U.S. Treasury EIP check deposit made on or about May 1, 2020 was an individual identified as “M.J.” M.J.’s Bank of America account had two counterfeit U.S. Treasury EIP checks, Counterfeit EIP Check A and Counterfeit EIP Check B, deposited into his/her Bank of America personal bank account, and was named as the payee on both checks.

10. Counterfeit EIP Check A was deposited into the Hilton ATM. *See supra* at para. 7. Surveillance footage from the Hilton ATM showed KNIGHT, with EZEIRUAKU, making the deposit. Both men were depicted wearing the same clothing as on KNIGHT’s story posted to Instagram. On the same day, the money deposited in M.J.’s account was removed through two ATM withdrawals, one made at the Hilton ATM and the other at a Capital One ATM in Newark, New Jersey, a Zelle bank transfer, and a debit card purchase. Surveillance footage from the Hilton ATM and Capital One ATM showed KNIGHT, EZEIRUAKU, and Ali Shultz (“SHOULTZ”) withdrawing the funds. The Zelle bank transfer was made to Torri Pedro’s (“PEDRO”) personal JPMC Bank account within minutes of the Counterfeit EIP Check A deposit. Investigators identified PEDRO to be EZEIRUAKU’s paramour. The debit card purchase occurred at the Gloucester City Post Office, where two legitimate USPS money orders were purchased, each issued for \$150, using M.J.’s compromised account debit card. These

USPS money orders were subsequently cashed with the listed payees as Abdulai M. Kamara, who also routinely posts ads to social media recruiting for bank accounts, and Shaquilla Little Burton, who is/was dating SHOULTZ.

11. On or about May 4, 2020, KNIGHT, accompanied by SHOULTZ, deposited Counterfeit EIP Check B into M.J.'s Bank of America personal bank account, in the amount of \$4,300, at an ATM in Linden, New Jersey. Almost immediately following the deposit, KNIGHT made two ATM withdrawals from the same ATM, withdrawing a total of \$1,500. Approximately ten minutes later, EZEIRUAKU conducted a balance inquiry from the same ATM in Linden, New Jersey.

12. Investigators identified the second Bank of America account holder, identified as "B.P.," who had Counterfeit EIP Check B deposited into his/her personal bank account. B.P. was named as the payee on the Counterfeit EIP Check B, which was deposited in the amount of \$4,210, on or about May 1, 2020, at the Hilton ATM. Surveillance footage of the deposit showed KNIGHT, EZEIRUAKU, and SHOULTZ together. Soon after the deposit was made, \$4,200 was withdrawn from B.P.'s Bank of American personal bank account through a Zelle bank transfer and a Cash App transfer. The Zelle bank transfer, in the amount of \$2,200, was made to PEDRO's JPMC personal bank account. The Cash App transfer, in the amount of \$2,000, was transferred to B.P.'s account. From there, the funds were transferred to another Cash App account.

13. Based on these deposits, investigators examined PEDRO's JPMC personal bank account. Investigators discovered that from on or about April 13, 2020 through May 8, 2020, PEDRO's JPMC personal checking account received \$39,914 in ATM deposits, Cash App transfers, Zelle bank transfers, and direct deposits. Of that sum, \$24,924 was deposited in ATM deposits, nearly all of which were conducted at the JPMC ATM located in Marlton, New Jersey (hereinafter the "JPMC Marlton ATM"). On or about April 5, 2020, PEDRO structured four cash deposits totaling \$10,119, including one for

\$9,999. Based on my training and experience, and knowledge of this case, I believe PEDRO structured the cash deposits under \$10,000 intentionally in order to avoid a financial institution's filing of a Currency Transaction Report (CTR). PEDRO's JPMC account also received \$6,500 in Zelle transfers from various personal bank accounts, including the two accounts belonging to M.J. and B.P. *See supra* at para. 10, 12. PEDRO's JPMC debit card, ending in 5213, was linked to a Cash App account registered to EZEIRUAKU. EZEIRUAKU's Cash App handle was "Glockboyz." From on or about April 13, 2020 through May 11, 2020, approximately \$14,067 was transferred from EZEIRUAKU's Cash App account into PEDRO's JPMC account. On or about April 29, 2020, PEDRO's JPMC account received a deposit of \$1,200 via direct deposit from the Internal Revenue Service, U.S. Treasury. This payment represented PEDRO's legitimate U.S. Treasury EIP check.⁶

14. From on or about April 13, 2020 through May 12, 2020, the vast majority of the aforementioned PEDRO JPMC deposits were withdrawn through ATM withdrawals, Cash App transfers, Zelle bank transfers, wire transfers, and debit card purchases. Approximately \$14,860 was withdrawn at the JPMC Marlton ATM and another JPMC ATM in Cinnaminson, New Jersey. JPMC provided surveillance footage of the ATM withdrawals on May 5, 2020 and May 12, 2020. On both dates, EZEIRUAKU was recorded on video surveillance removing funds from the JPMC ATM. Investigators identified multiple Cash App accounts that received money from PEDRO's JPMC personal account, including a payment to KNIGHT's Cash App account, identified as "Glo." Investigators also identified multiple debit card purchases made with PEDRO's JPMC personal account. These purchases included USPS money orders that were subsequently used to pay monthly rent for an apartment leased to EZEIRUAKU and a relative of PEDRO, located in Marlton, New Jersey. Investigators also identified two wire transfers from PEDRO's JPMC account to a car auction in North Miami Beach, Florida. On or

⁶ PEDRO only earned approximately \$5,304.39 during the first quarter of 2020.

about April 20, 2020, and April 23, 2020, two transfers, one for \$8,073 and a second for \$10,013, for the purchase of one 2013 Mercedes Benz CLS 550 4M and one 2018 Dodge Charger R/T. Both invoices were billed to Show Ready Car, LLC,⁷ a business with an address in Berlin, New Jersey, although paperwork associated with the vehicles listed EZEIRUAKU as the purchaser. Investigators learned that the address is a private residence that EZEIRUAKU uses.⁸ Between April 15, 2020 and September 22, 2020, EZEIRUAKU purchased six luxury vehicles,⁹ each costing between approximately \$10,000 and \$12,000. On or about June 4, 2020, PEDRO deposited approximately \$11,158 in cash into her relative's personal bank account.¹⁰ Immediately after the deposit, the funds were wired to the same car auction in North Miami Beach, Florida, to purchase one 2016 Dodge Challenger. EZEIRUAKU is identified as the purchaser in the auction paperwork. Based on my training and experience, and in the context of this investigation, I believe that PEDRO and others used her JPMC account to funnel and launder illicit proceeds from the counterfeit U.S. Treasury EIP check fraud scheme.

ii. May 4, 2020 Fraudulent Activity – Account holder “T.G.”

15. Investigators identified an account holder, identified herein as “T.G.,” who had counterfeit U.S. Treasury EIP checks deposited into his/her Bank of America personal bank account. T.G. was named as the payee on the counterfeit U.S. Treasury EIP check.

16. On or about May 4, 2020, EZEIRUAKU and PEDRO were recorded on bank surveillance footage depositing Counterfeit EIP Check A in the amount of \$2,400, payable to T.G., into

⁷ SHOULTZ lists “Show Ready Car LLC” as his employer according to his Facebook account using the handle “Ali Mucci.”

⁸ The invoice to “Show Ready Car LLC” also included a phone number and email, both known by investigators to belong to EZEIRUAKU.

⁹ The vehicles were one 2013 Mercedes-Benz CLS 550, one 2018 Dodge Charger, one 2015 Dodge Challenger, one 2016 Infinity Q50, one 2011 BMW 550.

¹⁰ Based in part on the facts discussed within this affidavit, JPMC closed PEDRO's personal bank account. Subsequently, PEDRO used her relative's Bank of Princeton account to deposit and wire money obtained from the fraud scheme.

T.G.'s Bank of America personal bank account. This check was deposited two times for a total deposit of \$4,800. The deposit was made via a Bank of America ATM located on South Street, Philadelphia, Pennsylvania (the "South Street ATM").

17. On or about May 5, 2020, EZEIRUAKU was recorded on bank surveillance footage depositing Counterfeit EIP Check A, in the amount of \$2,400 and payable to T.G., into T.G.'s Bank of America personal bank account. This check was deposited two times for a total deposit of \$4,800. The deposit was made via a Bank of America ATM located in Pennsauken, New Jersey.

18. Between on or about May 4, 2020 through May 5, 2020, approximately \$2,028 was withdrawn from T.G.'s Bank of America personal bank account via ATM withdrawals and online purchases. EZEIRUAKU and PEDRO were recorded on bank surveillance withdrawing cash from T.G.'s personal bank account at the South Street ATM. EZEIRUAKU and PEDRO were recorded on bank surveillance withdrawing cash from T.G.'s personal bank account at a PNC ATM located on White Horse Road in Somerdale, New Jersey.

Pursuant to F.R.Crim.P. 4.1, Special Agent Santana was sworn and attested to the contents of this affidavit in support of the complaint.



HON. ANN MARIE DONIO
United States Magistrate Judge

Date: 10/19/2020