

EXHIBIT 1

**AFFIDAVIT OF BRENDAN J. CULLEN
IN SUPPORT OF APPLICATION FOR A COMPLAINT AND ARREST WARRANT
AND FOR SEARCH WARRANTS**

I, Brendan J. Cullen, state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Department of Homeland Security (DHS) United States Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) assigned to the Providence Field Office. I have been employed by HSI and its predecessor, the U.S. Customs Service since January of 2003. In connection with my official duties, I have investigated and assisted other agents in investigating numerous cases involving a wide variety of criminal violations including, but not limited to, narcotics trafficking, money laundering, illegal importation of goods, fraud, intellectual property rights, and interstate transportation of stolen property.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

3. This affidavit is submitted in support of:

- a. a criminal complaint and arrest warrant for Kush Jitendrakumar PATEL (“PATEL”).
- b. pursuant to Rule 41 of the Federal Rules of Criminal Procedure, search warrants for
 - i. an Apple iPhone recovered from PATEL (“the Target Cell Phone 1”), described in more detail in Attachment A-1, incorporated by reference as if set forth in full, for the items described in Attachment B.
 - ii. an Android fold-style cell phone in a black protective case recovered from PATEL (“the Target Cell Phone 2”), described in more detail in Attachment A-2, incorporated by reference as if set forth in full, for the items described in Attachment B.hereinafter collectively described as the “Target Cell Phones”.

4. As will be shown below, there is probable cause to believe that:

- a. beginning on an unknown date, but not later than on or about July 11, 2024 and continuing through on or about September 21, 2024, PATEL did knowingly commit the following violations of federal law: Conspiracy to Commit Wire Fraud in violation of 18 U.S.C. § 1349, Wire Fraud in violation of 18 U.S.C. § 1343, Money Laundering in violation of 18 U.S.C. § 1956, and Conspiracy to Engage in Money Laundering, in violation of 18 U.S.C. § 1956(h) (“Specified Federal Offenses”), and
- b. evidence, fruits, and instrumentalities of the Specified Federal Offenses will be found on the Target Cell Phones.

PROBABLE CAUSE

5. On September 20, 2024, I became aware of a financial fraud investigation being conducted by the Tiverton Police Department (TPD). On this same date, I traveled to TPD along with HSI Task Force Officer (TFO) Kurt Ripke. While at TPD, I met with TPD Officer Nelson Moreira and Detective Nicole Beauvais. TPD personnel informed me that on September 20, 2024, an individual who will be referenced herein by his initials T.G., arrived at TPD and reported that he was concerned that his friend, hereinafter referenced by his initials K.V., was being victimized by a scam. T.G. informed TPD that his friend K.V. has been in contact with an individual purporting himself to be a Federal Trade Commission (FTC) agent. According to T.G., this individual informed K.V. that his (K.V.’s) identity has been compromised and that criminal charges of drug trafficking, money laundering, and child pornography have been associated with K.V. as a result of his compromised identity. T.G. further stated to TPD that his friend K.V. has purchased more than \$100,000 in gold and has given this gold to an unknown individual claiming to be an FTC agent who showed up at K.V.’s residence in Tiverton.

6. TPD personnel then responded to K.V.’s residence in Tiverton. Upon arrival, Officer Moreira met with K.V., a 72-year-old male. Officer Moreira described K.V. as fearful and uncertain about what to do. According to Officer Moreira, K.V. explained to him that in approximately August 2024, he received a “pop-up” on his computer prompting him to contact Microsoft at a number that was on the pop-up in order to “clean” his computer of viruses. K.V. informed Officer Moreira that he contacted the number that he believed was for Microsoft and was informed that his name was associated with drug trafficking, money laundering, and child

pornography. K.V. stated that the person that he believed to be a Microsoft representative informed him that this was serious and that she (the alleged Microsoft representative) would need to file a report and notify the FTC.

7. K.V. stated that a male who identified himself as “FTC Commissioner Alvaro Bedoya” also spoke to him. K.V. stated that Bedoya informed him that there were two options for clearing his name from the alleged charges. One option would involve the case being made public, while the other option would be for the case to be handled privately. For K.V. to handle his case privately, he would need to work with the FTC to determine who was using his (K.V.’s) identity. As part of this process of working with the FTC, K.V. would have to freeze his assets.

8. Officer Moreira and Detective Beauvais continued to speak with K.V. and learned that he had been communicating with individuals purporting to be from the FTC via phone and e-mail since August of 2024.¹ K.V. explained to TPD that he had been instructed by the alleged FTC representative to purchase gold bullion and transfer this gold to the FTC while they conducted their investigation. K.V. stated that he used his savings from multiple financial accounts, including a bank account, an Individual Retirement Account, and a Certificates of Deposit, to purchase gold as he was instructed. K.V. informed TPD that he purchased gold on three occasions from a gold dealer and provided receipts from these purchases to TPD.

9. I have reviewed copies of the receipts and observed that all three purchases were made from a gold dealer located in New York City. The first of these purchases was made via a direct bank transfer from K.V. to the dealer in the amount of \$96,093.96, on August 14, 2024. The second receipt shows a purchase made by K.V. in the amount of \$101,233.79, on September 5, 2024. The third transaction shows a purchase made by K.V. in the amount of \$165,762.32, also on September 5, 2024. K.V. stated that after making all three purchases, the gold was sent to him by the dealer via Fed-Ex shipments.

10. According to K.V., the individuals purporting to be from the FTC made arrangements to pick up the first two gold purchases (\$93,093.96 and \$101,233.79) from him at his home in Tiverton. K.V. stated that on two separate occasions, unknown individuals arrived at his residence in vehicles to retrieve the gold from him. K.V. stated that on both occasions, the

¹ K.V. provided law enforcement with two telephone numbers with Washington, D.C. area codes and an Outlook e-mail account as the known contacts for the individuals claiming to be from the FTC.

individuals were driving dark-colored vehicles and never exited their cars. Instead, the individual (or individuals) rolled down their rear windows and K.V. was instructed to transfer the gold through the rear window of the vehicle. K.V. was not able to give a detailed description of the person(s) who picked up the gold; he said that second pick up may have been by a Black male, but he only saw the back of his head.

11. During his meeting with TPD on September 20, 2024, K.V. stated that he has been in the process of making arrangements for the third transfer of gold on September 20, 2024. Based on this information, TPD maintained contact with K.V. and began to make arrangements with HSI and other law enforcement personnel for a possible enforcement action intended to intercept the individual who arrived to retrieve K.V.'s gold. However, K.V. did not receive further instructions regarding the transfer of gold on September 20, 2024.

12. On September 21, 2024, TPD personnel notified TFO Ripke that K.V. contacted TPD and informed them that he had been contacted by "Alvaro Bedoya" that morning requesting a transfer of the gold.² According to K.V., Bedoya told him that he was going to have his people drive to Tiverton to make the transfer and that someone could be there in approximately 3-4 hours. At law enforcement's direction, K.V. informed Bedoya that he did not wish to conduct the transfer at his home as they did on previous occasions. When Bedoya asked why, K.V. informed him that he did not want to conduct the transfer where it may be seen by his neighbors. K.V. informed Bedoya that they could conduct the transfer at the Park & Ride lot located on Fish Road in Tiverton. Bedoya agreed to this meeting location and informed K.V. that he would be in contact and let K.V. know when his people were close by for the gold pickup.

13. Law enforcement instructed K.V. to remove the gold bars that he purchased from the original FedEx box in which they arrived and replace them with low value items of similar size and weight. K.V. completed this task and placed unused tiles in the FedEx box. As the original estimated meet time approached, law enforcement instructed K.V. to drive to the Park & Ride parking lot with the box that originally contained the gold and now contained tiles. K.V. was instructed to provide updates to law enforcement as he heard more specifics about the time of the meeting. Law enforcement also instructed K.V. that once the individual arrived at the

² It should be noted that K.V. and Bedoya originally discussed possibly conducting the transfer of gold in Vermont, where K.V. has a vacation home. However, K.V. changed this plan, at the direction of TPD, to conduct the transfer in Tiverton.

Park & Ride parking lot, to exit his vehicle and place the box in the vehicle as he had done on the two previous occasions.

14. On September 21, 2024, at approximately 1:00 PM, I set up with other law enforcement personnel in the vicinity of the Park & Ride lot. A short time later, I observed K.V.'s vehicle enter the Park & Ride parking lot and park. Between approximately 1:00 PM and 2:00 PM, I observed multiple vehicles enter and leave the parking lot, including a silver-colored Dodge Ram pickup truck bearing Massachusetts license plates. This vehicle parked near K.V.'s vehicle for a short period of time but made no contact with K.V. and departed the area.

15. Just after 2:00 PM, I observed K.V.'s vehicle depart the Park & Ride lot and TPD personnel notified me that K.V. had received a communication and was told that the meeting location was changed to the parking lot of Sabitado's Pizzeria, a short distance away from the Park & Ride in Tiverton. I then drove to the area of Sabitado's Pizzeria and observed K.V. park his vehicle in that parking lot. A short time later, I observed the same silver Dodge Ram truck that I had observed in the Park & Ride lot parked next to K.V.'s vehicle. HSI Task Force Officer Kurt Ripke then observed K.V. depart his vehicle and place the box in the window of the Dodge Ram. This information was passed to law enforcement personnel staged in the area. At this point, HSI Task Force Officers Kurt Ripke, Jared Johansen, and other law enforcement personnel approached the Dodge Ram truck and placed the driver, who was identified as Kush Jitendrakumar PATEL (PATEL), into custody. PATEL was the sole occupant of the vehicle. As PATEL was being apprehended, I removed an ear bud from his ear. As I did so, PATEL stated something to the effect of "The person who is blackmailing me is on the phone". The front driver's side door to the Dodge Ram was open and I observed two cell phones -- Target Cell Phone 1 and Target Cell Phone 2 -- located in the center console of the vehicle.

16. PATEL was transported back to TPD for processing. It was determined that the Dodge Ram truck bearing Massachusetts license plates was a rental vehicle from Enterprise car rental. The rental agreement was in PATEL's name. The Dodge Ram was towed back to TPD.

17. Shortly after PATEL arrived at TPD, I conducted a recorded interview of PATEL, along with TPD Detective Beauvais.³ PATEL stated and demonstrated that he spoke English.

³ During the interview of PATEL, he was provided water, food, a blanket, and allowed to use the restroom as needed.

Prior to conducting this interview, I advised of PATEL of *Miranda* rights, which he voluntarily waived and signed a *Miranda* waiver form.

18. During this interview, PATEL stated that he was from India and currently resided in Bridgeport, CT. PATEL said that he was in the U.S. as a student and was about to begin a second graduate program at the University of North America in Virginia.

19. Multiple times in the beginning of the interview, PATEL claimed that this was the first time that he had picked up gold. PATEL also stated that he was communicating with individuals in India who have made threats that they will harm his family members in India and in the United States if he does not do what they ask of him. PATEL identified these individuals only as “JOHN” and “ROCKY.” (*Agent’s Note*: Prior to and during the interview of PATEL, Target Cell Phone 1 received continuous incoming calls. The locked screen on the phone displayed the names “John” and “Rocky”.) PATEL stated that these individuals were in India and spoke Gujarati. PATEL stated that he has never met JOHN and ROCKY in person and that they initiated contact with him over WhatsApp. PATEL said that these individuals sent him multiple photos of his family’s home and his sister’s workplace in India and threatened to harm these family members if PATEL did not assist them.

20. PATEL stated that he was instructed by JOHN and ROCKY to travel to Phoenix, AZ over the last few days, where he was going to pick up gold on their behalf. PATEL stated that this pickup did not occur, so he flew from Phoenix back to the East Coast and rented the vehicle he was driving at Boston Logan Airport. PATEL stated that he was originally instructed to go to Vermont, where he would be conducting a pickup on behalf of JOHN and ROCKY, but these plans changed. PATEL stated that he was instructed to drive to the location in Rhode Island and parked at the Park & Ride lot across from a car dealership. While in this parking lot, PATEL stated that he saw a truck with an occupant whom he believed to be the person he was going to meet. PATEL stated that he pondered sending the occupant of this truck a universal sign for help but did not do so.⁴ PATEL could not explain why, if he felt threatened, he did not seek assistance from the Tiverton Police Department, which he drove past on that day prior to meeting with K.V.

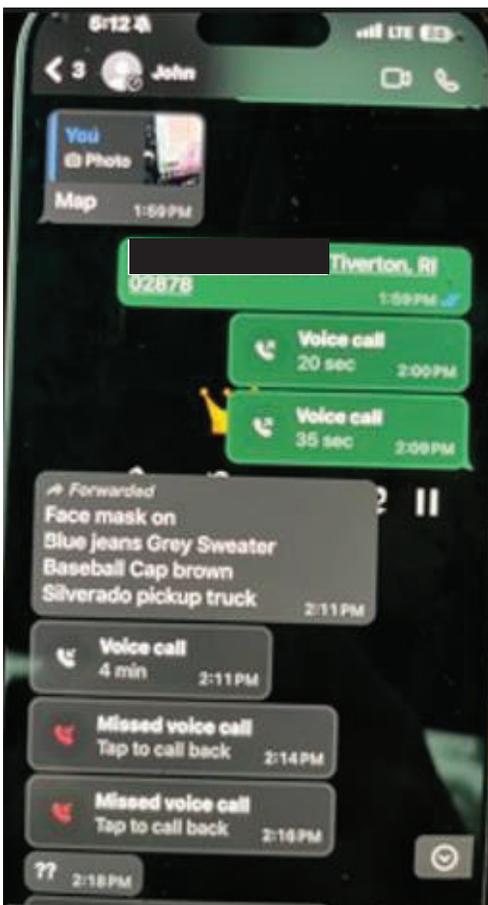
⁴ When asked what sign he was referring to, PATEL demonstrated a hand motion commonly associated with a help signal someone may give when in distress and cannot verbally request help.

21. PATEL stated that he was instructed by JOHN and ROCKY to choose a location nearby as an alternative meeting location. PATEL said that he then selected Sabitado's Pizzeria and relayed this information to JOHN and ROCKY. PATEL stated that when he met with the individual from whom he was picking up gold in the parking lot of Sabitado's Pizzeria, he was on the phone with JOHN who instructed PATEL to thank the individual after the box was delivered to PATEL. PATEL stated that he knew that there was supposed to be gold in the box that he was given.

22. During the interview, PATEL stated that he did not wish to provide consent to law enforcement to search his cell phones or provide his passcodes. However, PATEL stated that he would be willing to share the content of his communications with JOHN, which he said was contained in Target Cell Phone 1. PATEL stated that Target Cell Phone 2 was his personal phone, where he sometimes played games, but did not elaborate more about this phone or why he had two cell phones in his possession. PATEL unlocked Target Cell Phone 1 and he opened up a WhatsApp⁵ chat/call string between him and JOHN and showed me this string. While he was showing me the text string, I took some screen shots of the text string. While reviewing this string, I observed numerous messages beginning on July 11, 2024, and running through September 21, 2024. These messages revealed screen shots of maps, residential addresses in various states, clothing descriptions, photos and weights of gold, and travel arrangements.

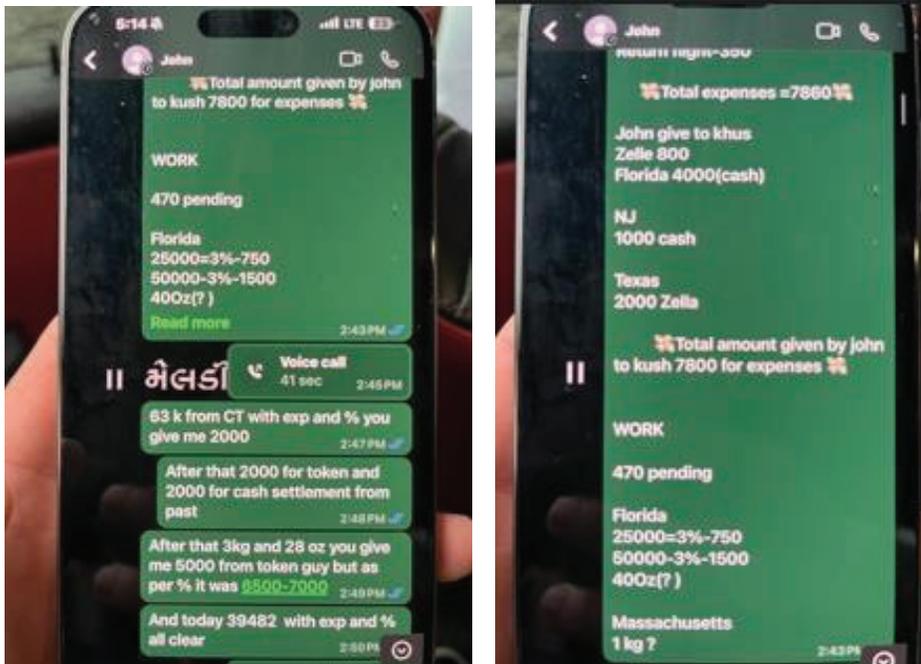
⁵ WhatsApp is an encrypted instant messaging and voice over the internet service provided by the U.S.-based company Meta.

23. Several of these chat messages with JOHN pertained to the gold pickup in Tiverton. For example, in the screen shot below taken from this string between PATEL and JOHN, PATEL provided the address for Sabitado's Pizzeria and then JOHN provided a description for K.V.'s clothing and vehicle as seen below:⁶



⁶ It should be noted that K.V. provided this information to the alleged FTC representative while making arrangements for this meet.

24. When confronted with the large number of addresses, photos, and other information suggesting additional gold and monetary pickups in various states, PATEL stated that none of these pickups were successful. PATEL maintained that today’s pickup in Tiverton was his first successful pickup of gold. Several screen shots of these chats contained in Target Cell Phone 1 describing dollar amounts and weights, can be seen below:



25. PATEL stated to law enforcement that he is not aware of what JOHN and ROCKY’s business is or where the gold he is picking up is derived from, but he knows that JOHN references individuals who turn over gold to PATEL as “Delivery Persons,” while ROCKY references these individuals as “Customers.” PATEL stated that when he asked about the business, he was told by JOHN and/or ROCKY that “It is our thing, and you don’t need to know.”

26. PATEL stated that JOHN authorizes reimbursement for his travel and other related expenses. However, PATEL stated that he is supposed to be paid by the person who he gives the gold to after he picks up and delivers the gold. PATEL stated that since this hasn’t happened yet, and he has not been paid. (*Agent’s Note:* This statement appears to contradict the messages contained in PATEL’s WhatsApp chats with JOHN that PATEL showed me, where

PATEL references amounts owed to him, including Zelle⁷ transfers as seen in screen shots, including the above images.)

27. During his interview, PATEL agreed to cooperate with law enforcement by continuing the communications with JOHN and ROCKY.

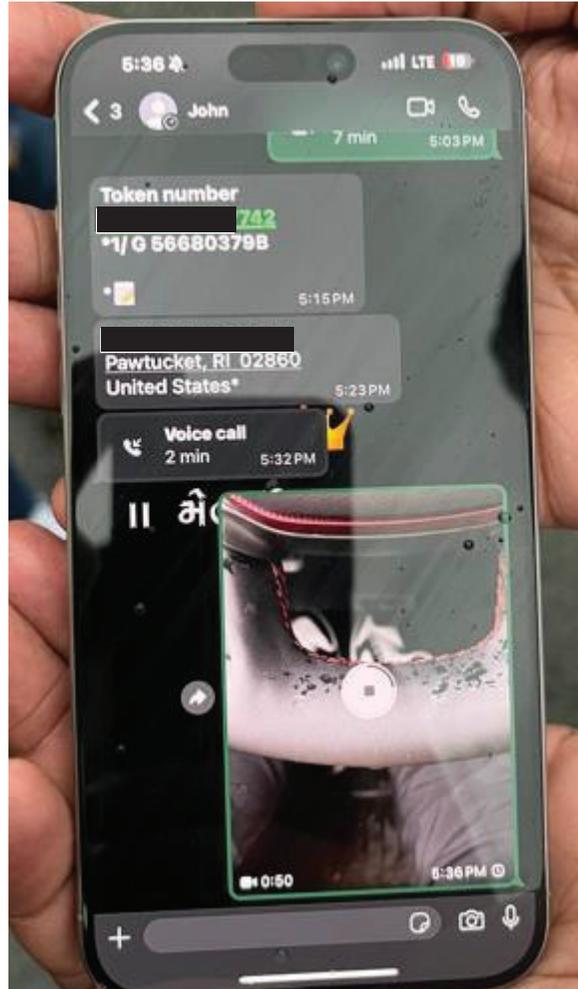
28. PATEL also provided written consent for law enforcement to search his rental vehicle. A search of this vehicle occurred at approximately 4:15 PM, where law enforcement discovered the FedEx box that K.V. provided to PATEL on the seat of the vehicle, as well as personal belongings of PATEL.

29. While accompanied by law enforcement, PATEL placed and received multiple calls to and from JOHN and ROCKY using Target Cell Phone 1.⁸ Some of these calls were recorded and many were conducted in the Gujarati language, and PATEL explained what had transpired during the calls conducted in Gujarati. According to PATEL, JOHN and ROCKY wanted to know why PATEL had not been in contact with them after the pickup of the gold. At law enforcement's direction, PATEL explained to JOHN and ROCKY that he was stopped by the police and, that due to his heightened state of anxiety, he underwent a sobriety test with law enforcement and was later released. PATEL stated that JOHN and ROCKY requested multiple video calls where he was asked to show his surroundings and the box containing the gold. PATEL was also asked to make a video of himself opening the box containing the gold and show the gold to JOHN and ROCKY. With the assistance and authorization of law enforcement, PATEL conducted these video calls in his rental truck at a location nearby TPD. PATEL also conducted a video of him opening the FedEx box, which had been repacked with the original gold bars purchased by K.V. and resealed by law enforcement.

⁷ Zelle is a digital payments network that allows users to send and received money between accounts in the United States.

⁸ It should be noted that based on the content of the phone calls made to and received from JOHN and ROCKY in my presence, it is believed that both of these unidentified males were together at the times of these calls.

30. Following these calls with JOHN and ROCKY, JOHN texted an address ([REDACTED], Pawtucket) and phone number [REDACTED]-7742) to PATEL and instructed him to call the number and drive the gold to this location in Pawtucket, where it was to be delivered to an unknown individual. These text messages appears below:



Also listed on this text from JOHN, along with the phone number, were the words “Token number” and the alpha-numeric digits “*1/G 56680379B”. PATEL stated that for each pickup of gold, he is given a “token” which is a serial number on a bill of U.S. currency. PATEL further explained that as was done previously and would be done in Pawtucket, if the intended recipient of the gold was able to produce a U.S. currency note bearing these digits, the exchange could proceed. From viewing an online search of the address, the [REDACTED], Pawtucket, appeared to be a multi-purpose industrial-style building at the end of a dead-end street, which was confirmed after driving to the location.

31. While PATEL was being interviewed, a TPD officer advised me that a staff person from Sabitado's Pizzeria had called TPD and informed TPD that an unknown individual had contacted Sabitado's Pizzeria and asked whether an arrest had occurred there that afternoon. The TPD officer believed that the Sabitado's Pizzeria staff member didn't advise the unknown caller of the arrest of PATEL, and that officer showed me a post-it with the telephone number of the unknown caller that had been provided by the Sabitado's Pizzeria staff member. After JOHN sent PATEL the phone number for the person to whom he should deliver the gold, I noted that the telephone number that JOHN gave PATEL (██████████-7742) was the same number that had called Sabitado's Pizzeria inquiring whether an arrest had occurred.

32. Based on the information provided to PATEL, I contacted the Pawtucket Police Department (PPD) and made arrangements to transport PATEL to PPD in anticipation of a possible meeting with the unidentified co-conspirator.

33. On September 21, 2024, at approximately 6:30 PM, law enforcement transported PATEL from TPD to PPD. Prior to and during this drive, PATEL received multiple calls from JOHN and ROCKY over WhatsApp. These calls, which PATEL conducted using the speaker phone feature on Target Cell Phone 1, were conducted in both Gujarati and English. According to PATEL, JOHN and ROCKY pressed PATEL to contact ██████████-7742, the number that JOHN had given PATEL and update on his progress towards the Pawtucket address. Furthermore, in English, and according to PATEL, also in Gujarati, JOHN and ROCKY threatened PATEL that they would physically harm his family if he did not follow their orders or if he tried to steal the gold that they believed he had in his possession. According to PATEL, as part of their threats, JOHN and ROCKY informed PATEL that they were in Ahmedabad, India, and only 70 kilometers from his family's home. PATEL stated that JOHN and ROCKY commonly made these threats but that they appeared to be more suspicious on this occasion, which PATEL said he believed was because he had missed so many of their calls earlier that day and had refused multiple times to engage the video call function on his phone while speaking with them.

34. At approximately 7:40 PM, I sat with PATEL and two other law enforcement officers in his rental vehicle in the vicinity of ██████████ in Pawtucket. PATEL made multiple calls to the phone number ██████████-7742, that had been provided to him by JOHN. I listened to these calls and determined that the individual using this number had a male voice and spoke with PATEL in accented English. This individual asked PATEL to take a photo of where

he is located and send it to him. Law enforcement used PATEL's phone to take photo near the intersection of [REDACTED] and [REDACTED] in Pawtucket. PATEL sent this photo by text to the unknown user of [REDACTED]-7742 who texted PATEL that he could see his vehicle.

35. This individual asked PATEL to exit the vehicle and place the box (FedEx box) next to a Toyota parked nearby. Under the cover of darkness, a law enforcement officer removed the FedEx box from the vehicle and placed it next to the Toyota and returned to the vehicle. After several text messages between PATEL and the user of [REDACTED]-7742, the unknown user texted PATEL that something was suspicious and asked that they conduct the exchange on the following day. PATEL next spoke with JOHN and provided an update about the individual's reluctance to take the box. According to PATEL, JOHN stated that the "token" had been cancelled and they would have to try again the next day. When PATEL called the user of [REDACTED]-7742 d (the intended recipient of the gold), he told PATEL that he had been there in a black-colored Malibu vehicle but had since departed the area and that the token had been canceled. He stated to PATEL that they would have to try again on the following day. During the time of this transaction, there was consistent traffic in the vicinity of [REDACTED] making a positive identification of the intended recipient difficult to make.

36. At approximately 8:20 PM the operation was discontinued, and PATEL was transported to PPD. While at PPD, PATEL was allowed to contact a family member in the United States that he said was his grandmother to inform her of his arrest. PATEL's personal belongings were collected, and he was transported to the Wyatt Detention Center by me and TFOs Kipke and Johansen, after I had been advised that the Honorable Patricia A. Sullivan had authorized that he be held.

TRAINING AND EXPERIENCE WITH FINANCIAL FRAUD INVESTIGATIONS

37. Based on my training and experience, I know that individuals and criminal organizations engaged in illicit fraud and money laundering activities utilize a variety of methods to conceal and disguise the true nature and source of the funds. I know these methods are designed in part to deter law enforcement and regulators from tracing the origin of the funds and thereby discovering the underlining criminal activity. I also know from my training and experience that criminal organizations engaged in internet-based fraud schemes often utilize

networks of individuals in the United States, and use cell phones and other digital devices to communicate.

38. I know from my training and experience that individuals involved in fraud and money laundering activities attempt to conceal their involvement in the underlining criminal activity in a variety of ways. In doing so, they may engage in financial transactions that are designed to hide the true nature and source of the funds and the individual's involvement. In this investigation, I believe that the request to the victim to purchase gold bars was an effort to conceal the source of the funds.

39. Based on my training and experience, I know that individuals engaged in wire fraud and money laundering activities, often maintain records for extended periods of time, particularly when they are involved in ongoing criminal conduct. Records are commonly maintained digitally, via the use of cellular phone and those records can be stored on said devices indefinitely. For documents, images, and videos delivered electronically, person may also be under the mistaken belief that they have deleted, hidden or further destroyed any digital evidence that could be retrieved by a trained forensic computer expert.

40. I also know that wire fraud and money laundering suspects frequently take or cause to be taken photographs and/or videos of themselves, their associates, and illicit proceeds. These wire fraud suspects often maintain these photographs and/or videos in their electronic devices.

TRAINING AND EXPERIENCE ON DIGITAL DEVICES

41. Based on my training, experience, and information from those involved in the forensic examination of digital devices, I know that the following electronic evidence, inter alia, is often retrievable from digital devices:

- a. Forensic methods may uncover electronic files or remnants of such files months or even years after the files have been downloaded, deleted, or viewed via the Internet. Normally, when a person deletes a file on a computer, the data contained in the file does not disappear; rather, the data remain on the hard drive until overwritten by new data, which may only occur after a long period of time. Similarly, files viewed on the Internet are often automatically downloaded into a temporary directory or cache that are only overwritten as they are replaced with more

recently downloaded or viewed content and may also be recoverable months or years later.

- b. Digital devices often contain electronic evidence related to a crime, the device's user, or the existence of evidence in other locations, such as, how the device has been used, what it has been used for, who has used it, and who has been responsible for creating or maintaining records, documents, programs, applications, and materials on the device. That evidence is often stored in logs and other artifacts that are not kept in places where the user stores files, and in places where the user may be unaware of them. For example, recoverable data can include evidence of deleted or edited files; recently used tasks and processes; online nicknames and passwords in the form of configuration data stored by browser, e-mail, and chat programs; attachment of other devices; times the device was in use; and file creation dates and sequence.
- c. The absence of data on a digital device may be evidence of how the device was used, what it was used for, and who used it. For example, showing the absence of certain software on a device may be necessary to rebut a claim that the device was being controlled remotely by such software.
- d. Digital device users can also attempt to conceal data by using encryption, steganography, or by using misleading filenames and extensions. Digital devices may also contain "booby traps" that destroy or alter data if certain procedures are not scrupulously followed. Law enforcement continuously develops and acquires new methods of decryption, even for devices or data that cannot currently be decrypted.

CONCLUSION

42. I therefore submit that there is probable cause to believe that beginning on an unknown date but not later than July 11, 2024 and continuing through on or about September 21, 2024, in the District of Rhode Island and elsewhere, defendant KUSH JITENDRAKUMAR PATEL did knowingly commit the Specified Federal Offenses, and that evidence, fruits, and instrumentalities of such the Specified Federal Offenses will be found on the Target Cell Phones.

Respectfully submitted,



BRENDAN J. CULLEN
Special Agent

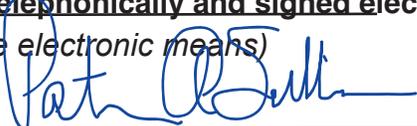
BRENDAN J. CULLEN
Special Agent
Homeland Security Investigations

Sworn telephonically and signed electronically

Subscribed and sworn ~~to before me~~
on September 22, 2024



HONORABLE PATRICIA A. SULLIVAN
UNITED STATES MAGISTRATE JUDGE

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by <u>Sworn telephonically and signed electronically</u> (specify reliable electronic means)	
<u>September 22, 2024</u> Date	 Judge's signature
<u>Providence, Rhode Island</u> City and State	<u>Patricia A. Sullivan, USMJ</u> Printed name and title