

Approved: Ashley C. Nicolas
ASHLEY C. NICOLAS
Assistant United States Attorney

Before: THE HONORABLE SARAH NETBURN
United States Magistrate Judge
Southern District of New York

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

21 MAG 2056

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	:	
UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
	:	
- v. -	:	Violations of 18 U.S.C.
	:	§§ 1543, 1001(a)(2),
RODNEY ROBINSON,	:	1028A(a)(1), (b)(1), (b),
a/k/a "Alim Shariff"	:	and 2.
	:	
Defendant.	:	COUNTY OF OFFENSE:
	:	NEW YORK
- - - - -	X	

SOUTHERN DISTRICT OF NEW YORK, ss.:

XANDER MCDONALD SMITH, being duly sworn, deposes and says that he is a Special Agent with the United States Department of State, Diplomatic Security Service, and charges as follows:

COUNT ONE
(Forgery and False Use of a Passport)

1. From in or about January 2017 up to and including July 2019, in the Southern District of New York and elsewhere, RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, falsely made, forged, counterfeited, mutilated, and altered an instrument purporting to be a passport with the intent that said instrument be used, and willfully and knowingly used, and attempted to use, a falsely made, forged, counterfeited, mutilated, and altered instrument purporting to be a passport, to wit, ROBINSON submitted to his employer a copy of an instrument purporting to be a United States passport bearing false information, including a false passport number, name,

birth date, and place of birth, as a means of identification in order to gain employment.

(Title 18, United States Code, Sections 1543 and 2.)

COUNT TWO
(Forgery and False Use of a Passport)

2. In or about June 2020, in the Southern District of New York and elsewhere, RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, falsely made, forged, counterfeited, mutilated, and altered an instrument purporting to be a passport with the intent that said instrument be used, and willfully and knowingly used, and attempted to use, a falsely made, forged, counterfeited, mutilated, and altered instrument purporting to be a passport, to wit, ROBINSON submitted to his employer a copy of an instrument purporting to be a United States passport bearing false information, including a false passport number, name, birth date, and place of birth, as a means of identification in order to gain employment.

(Title 18, United States Code, Sections 1543 and 2.)

COUNT THREE
(False Statements)

3. On or about January 19, 2017, in the Southern District of New York and elsewhere, RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully did make a materially false, fictitious, and fraudulent statements and representations, to wit, in an application for employment, ROBINSON falsely represented his name and passport number on a Department of Homeland Security, U.S. Citizenship and Immigration Services Form I-9 (Employment Eligibility Verification Form) and, on a Department of the Treasury, Internal Revenue Service ("IRS") Form W-4, falsely represented his name, birth date, and social security number.

(Title 18, United States Code, Section 1001(a)(2).)

COUNT FOUR
(Aggravated Identity Theft)

4. From in or about January 2017 up to and including July 2019, in the Southern District and elsewhere, RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, knowingly possessed and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(7), to wit, ROBINSON used the passport number of another person in relation to the passport fraud charged in Count One of this Complaint.

(Title 18, United States Code, Section 1028A(a)(1), 1028A(b),
and 2.)

COUNT FIVE
(Aggravated Identity Theft)

5. In or about June 2020, in the Southern District and elsewhere, RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, knowingly possessed and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(7), to wit, ROBINSON used the passport number of another person in relation to the passport fraud charged in Count Two of this Complaint.

(Title 18, United States Code, Section 1028A(a)(1), 1028A(b),
and 2.)

COUNT SIX
(Aggravated Identity Theft)

6. On or about January 30, 2017, in the Southern District and elsewhere, RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, knowingly possessed and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(4), to wit, ROBINSON used the social security number of another person in relation to the false statements charged in Count Three of this complaint.

(Title 18, United States Code, Section 1028A(a)(1), 1028A(b),
and 2.)

The bases for my knowledge and the foregoing charge are, in part, as follows:

7. I am a Special Agent with the United States Department of State, Diplomatic Security Service ("DSS"), and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with law enforcement agents and others and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

8. Based on my involvement in this investigation, I have learned that RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, has, on at least three occasions, gained employment by purporting to be a PhD named "Alim Shariff." In the course of his fraud and during the hiring process, ROBINSON has repeatedly used a fake identification documents, including fake passports, as proof of his identity, a false social security number ("SSN"), and a false date of birth when completing employment paperwork.

Employer-1

9. Based on my conversations with his former employer and my review of employment paperwork submitted to his former employer, I have learned, among other things, the following regarding "Alim Shariff:"

a. On or about May 2, 2020, an individual identifying himself as "Alim Shariff" responded to an online advertisement soliciting applications for the position of Program Director with a rehabilitation and education facility in New York, New York ("Employer-1").

b. In support of his application, "Shariff" submitted a resume in which he claimed to be a PhD and Naval Reservist by the name of "Alim Shariff" (the "Shariff Resume"). "Shariff" claimed to be a "board certified behavior analyst" and "licensed psychological examiner." "Shariff" also listed among

other prior employers, two specific New York City area social service providers ("Employer-2" and "Employer-3").

c. In or about June 2020, "Shariff" accepted a position as Program Director with Employer-1. As part of his onboarding process, "Shariff" provided Employer-1 with a copy of an instrument which he claimed to be his passport ("Shariff Passport-1), bearing the name "Alim Shariff," a particular birth date in 1979 (the Shariff Birth Date"), a place of birth of "Morocco," and a particular passport number (the "Shariff Passport Number"). "Shariff" also submitted a copy of document purporting to be a Washington State Driver's License in the name of "Alim Shariff."

d. On or about June 8, 2020, "Shariff" commenced employment with Employer-1. At that time, "Shariff" completed a Department of Homeland Security, U.S. Citizenship and Immigration Services Form I-9 (Employment Eligibility Verification Form) (the "Employer-1 I-9"). On the Employer-1 I-9, "Shariff" listed his name as "Alim Shariff," his birth date as the Shariff Birth Date, his address as a particular address on East 63rd Street ("Shariff Address-1") and his assigned SSN as a particular SSN ending in -8831 (the "8831 SSN").¹

e. On or about June 8, 2020, "Shariff" completed a Department of the Treasury, Internal Revenue Service ("IRS") Form W-4 (the "Employer-1 W-4") on which he claimed that his name was "Alim Shariff" and that his address was Shariff Address-1. "Shariff" did not include a SSN.

f. Before allowing "Shariff" to provide treatment to Employer-1 clients, Employer-1 attempted to verify Shariff's educational and professional certifications. In or about December 2020, Employer-1 employees consulted a national credential registry and confirmed that the credential number submitted by "Shariff" was not a legitimate credential number.

g. Upon discovering that "Shariff's" credentials were fake, Employer-1 officials performed a cursory internal investigation (the "Internal Investigation"). During the Internal Investigation, Employer-1 contacted the educational institutions cited on the Shariff Resume and confirmed that "Shariff" had not in fact received degrees. Employer-1 also

¹ On or about December 12, 2020, I visited Shariff Address-1. Although online searches appear to suggest that Shariff Address-1 is a residential building, it is, in fact, a substation.

reviewed "Shariff's" hiring paperwork and discovered that Shariff Passport-1 bore minor imperfections, including improper photo staging and placement, which led Employer-1 to conclude that Shariff Passport-1 was fake.

h. On or about December 7, 2020, Employer-1 placed "Shariff" on administrative leave. Employer-1 also contacted law enforcement to report the apparently fake passport.

Employer-2

10. Based on my conversations with Employer-2 and my review of employment and hiring paperwork submitted to Employer-2, I have learned, among other things, the following regarding RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant:

a. In or about June 2017, ROBINSON applied for the position of Site Director with Employer-2 — a housing services provider in Manhattan, New York. In support of his application, ROBINSON submitted a resume in which he claimed to be a PhD and Naval Reservist by the name of "Alim Shariff."

b. As part of his onboarding process, "Shariff" provided Employer-2 with a copy of an instrument which he claimed to be his passport, bearing the same biographical information as Shariff Passport-1 and the Shariff Passport Number but a different passport picture ("Shariff Passport-2," and together with "Shariff Passport-1," the "Shariff Passports").

c. On or about June 17, 2017, "Shariff" completed a Department of Homeland Security, U.S. Citizenship and Immigration Services Form I-9 (Employment Eligibility Verification Form) (the "Employer-2 I-9"). On the Employer-2 I-9, "Shariff" listed his name as "Alim Shariff," his birth date as the Shariff Birth Date, and his assigned SSN as a particular SSN ending in -8223 (the "8223 SSN").

d. On or about June 17, 2017, "Shariff" completed a Department of the Treasury, Internal Revenue Service ("IRS") Form W-4 (the "Employer-2 W-4") on which he claimed that his name was "Alim Shariff." "Shariff" did not include an SSN.

Employer-3

11. Based on my conversations with Employer-3, and my review of employment and hiring paperwork submitted to Employer-

3, I have learned, among other things, the following regarding RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant:

a. In or about January 2017, ROBINSON applied for the position of Program Director at Employer-3 — a social service agency headquartered in Brooklyn, New York. In support of his application, ROBINSON submitted an application form and resume on which he claimed to be a PhD and Naval Reservist by the name of "Alim Shariff."

b. In or around January 2017, "Shariff" was offered and accepted the position of Program Director with Employer-3. As a part of the onboarding process, "Shariff" provided Employer-3 with a copy of Shariff Passport-2.

c. On or about January 19, 2017, "Shariff" completed a Department of Homeland Security, U.S. Citizenship and Immigration Services Form I-9 (Employment Eligibility Verification Form) (the "Employer-3 I-9"). On the Employer-3 I-9, "Shariff" listed his name as "Alim Shariff," his birth date as the Shariff Birth Date and his assigned SSN as a particular SSN ending in -0086 (the "0086 SSN").

d. On or about January 19, 2017, "Shariff" completed a Department of the Treasury, Internal Revenue Service ("IRS") Form W-4 (the "Employer-2 W-4") on which he claimed that his name was "Alim Shariff" and that his SSN was the 0086 SSN.

12. Based on my review of records in a law enforcement database, I know that "Rodney Robinson" was arrested in 2012 for a probation violation following a 2005 conviction for fraud and aggravated identity theft in the Western District of Tennessee. I have compared the 2012 arrest photo of Robinson, with the photos in the Shariff Passports and I have concluded that they appear to depict the same individual. The Robinson arrest photo and Shariff Passport-1 are below:



Robinson Arrest Photo



Shariff Passport-1 Photo

13. Based on my review of records maintained by the Social Security Administration, I have learned, among other things, the following:

a. RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, is a U.S. citizen who was born in Tennessee on January 6, 1966.

b. ROBINSON is assigned an SSN ending in - 6203.

c. The 0086 SSN is a legitimate SSN assigned to another individual. The 8831 and the 8223 SSNs are not legitimate SSNs.

14. Based on my review of the records maintained by the Department of State, including the State Department Consular Consolidated Database, I have learned, among other things, the following:

a. RODNEY ROBINSON, a/k/a "Alim Shariff" the defendant, has never been issued a valid U.S. Passport.

b. No valid U.S. passports have been issued bearing the biographical information appearing either Shariff Passport-1 or -2.

c. The Shariff Passport Number is assigned to a legitimate United States passport issued in another name and on a different date than that appearing on the Shariff Passports. The pictures appearing in the Shariff Passports are not of the same individual pictured in the legitimate passport bearing the Shariff Passport Number.

WHEREFORE the deponent requests that a warrant be issued for the arrest of RODNEY ROBINSON, a/k/a "Alim Shariff," the defendant, and that he be arrested and imprisoned or bailed, as the case may be.

/s authorized electronic signature

XANDER MCDONALD SMITH
Special Agent
Diplomatic Security Services
U.S. Department of State

Sworn to me by reliable
electronic means this
23rd day of February 2021



THE HONORABLE SARAH NETBURN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK