

AO (Rev. 5/85) Criminal Complaint

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

CASE NUMBER: 8:12MJ1143TBM

NEDAL AHMAD

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about January 2011, through and including the present date, in Hillsborough County, in the Middle District of Florida, defendant(s) did,

attempt to commit mail fraud by mailing or shipping fraudulently obtained Treasury checks in a scheme to defraud th United States Treasury

in violation of Title 18, United States Code, Section(s) 1341. I further state that I am a(n) Special Agent with United States Secret Service, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No



Signature of Complainant
S. Jason Krout

Sworn to before me and subscribed in my presence,

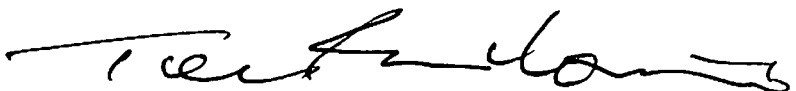
²³
March 22, 2012 _____

at

Tampa, Florida _____

THOMAS B. McCOUN, III
United States Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, S. Jason Krout, Special Agent, U.S. Secret Service Tampa, Florida, being sworn to tell the truth, state the following information:

1. I am a Special Agent with the U.S. Secret Service (USSS). I am currently assigned to the Tampa Field Office in Tampa, Florida. I have been employed with the USSS since 1999. During the course of my career in law enforcement, I have led, conducted, and participated in numerous criminal investigations of violations of state and federal laws involving bank fraud, wire fraud, access device fraud, money laundering, and the counterfeiting of U.S. currency. In doing so, I have utilized a wide array of investigative techniques including, but not limited to, physical and electronic surveillance, use of confidential sources, undercover operations, the execution of search and arrest warrants, analysis of telephone and electronic mail tolls and records, and analysis of financial records. I have received specialized training in investigating crimes involving bank fraud, access device fraud, and other financial crimes from the USSS academy in Beltsville, Maryland and the Federal Law Enforcement Training Center in Glynco, Georgia.

2. The facts set forth in this affidavit are based on my personal knowledge; information obtained from other individuals, including detectives from the Tampa Police Department (TPD) and Hillsborough County Sheriff's Office (HCSO); my review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience. The information contained in this affidavit is true and correct, to the best of my knowledge and belief.

3. Based on information contained in this affidavit, I believe there is probable cause to charge Nedal Ahmad with mail fraud, in violation of 18 U.S.C. § 1341.

4. The statements contained in this affidavit are based in part on information provided to the USSS Tampa Field Office by various law enforcement officers, persons with personal knowledge of the events and circumstances, the review of records and documents, and information gained through my experience and background as a Special Agent with the USSS. This affidavit is intended to demonstrate only that there exists probable cause to support a complaint to charge Nedal Ahmad with mail fraud, and does not purport to set forth all of my knowledge of, or investigation into, this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

5. Pursuant to Title 18, United States Code, Section 1341, it is against federal law for an individual to use the United States mail or to transmit something by interstate carrier in carrying out a scheme to defraud or attempting to do so. In this case, your affiant has established probable cause that Nedal Ahmad attempted to commit mail fraud by mailing or shipping fraudulently obtained Treasury checks in a scheme to defraud the U.S. Treasury.

PROBABLE CAUSE

6. In an effort to aid in the review of this affidavit and provide an overall understanding of the scheme, I will summarize the nature of the fraudulent activities identified during this investigation. Attribution of these facts will follow. In sum, I have probable cause to believe that from at least in or around January 2011, through the present, Nedal Faisal Ahmad, individually and through his family's clothing and check

cashing store known as Empire Street Wear in Tampa, Florida, has been engaging in a scheme and artifice to defraud the U.S. Treasury Department by negotiating fraudulently obtained tax refunds. Ahmad apparently does so in two primary ways: a) negotiating U.S. Treasury checks in individuals' names other than those who are actually in possession of the checks; and b) negotiating preloaded debit cards that are loaded with proceeds derived from filing false tax returns in other persons' names, to include deceased persons. This is commonly known as "Turbo Tax" fraud.

7. On or about April 26, 2011, I met with Regions Bank Corporate Investigator, D.W., who provided detailed information regarding a former Regions Bank employee named H.H. H.H. engaged in a systematic and ongoing course of conduct by opening over 184 fraudulent bank accounts in 149 identity theft victims' names using their social security numbers without knowledge or permission. These bank accounts were then used to facilitate a sophisticated identity theft and tax fraud scheme designed to defraud the U.S. Treasury Department out of approximately \$1,081,419.61.

Documents provided by D.W. show that Nedal AHMAD's brother, R.S., received proceeds from this fraudulent scheme. According to the Florida Department of State, Division of Corporations records, R.S. is the current registered President of "Empire Street Wear" and Ahmad was the registered Secretary of "Empire Street Wear" in 2008.

8. My investigation has determined that checks totaling approximately \$65,464.50 were written from Regions Bank accounts opened by H.H. and funded by fraudulent tax refunds to Empire Street Wear and R.S. Those checks include, but are not limited to, the following: (a) bank accounts ending in 9616 and 6767 had five (5) fraudulently obtained tax refund checks deposited into them in the amounts of

\$4,093.00, \$1,903.00, 4,093.00, \$5,328.78 and \$7,932.50; (b) bank accounts ending in 9578 and 6597 had two (2) fraudulently obtained tax refund checks deposited into them in the amounts of \$9,797.00 & \$5,069.10; (c) bank accounts ending in 9756 and 7178 had two (2) fraudulently obtained tax refund checks deposited into them in the amounts of \$4,254.00 and \$2,075.00; (d) the bank account ending in 9780 had two (2) fraudulently obtained tax refund checks deposited into it in the amounts of \$4,254.00, \$9,946.00; (e) bank accounts ending in 9837 and 7224 had one (1) fraudulently obtained tax refund check deposited into them in the amount of \$3,037.00; (f) bank accounts ending in 1974 and 7356 had two (2) fraudulently obtained tax refund checks deposited into them in the amounts of \$1,453.00 and \$8,561.00; and (g) the bank accounts ending in 9756 and 7178 had three (3) fraudulently obtained tax refund checks deposited into them in the amounts of \$1,401.00, \$6,172.00, and \$5,378.00. These records show that Empire Street Wear facilitated and or profited from the scheme to defraud the U.S. Treasury in the amount of approximately \$65,464.50 by writing personal or cashier's checks drawn off of the above listed bank accounts to Empire Street Wear or other conspirators involved in the tax fraud scheme.

9. On or about May 14, 2011, H.H. was arrested by Pasco County Sheriff's Office (PCSO) Detective Ross for her involvement in the above described fraudulent scheme. She continues to face state charges and is cooperating with local and federal law enforcement authorities. In connection with his tax fraud activities, Ahmad's brother, R.S. was charged in the Southern District of Florida with conspiracy to defraud the government by making false claims (18 U.S.C. § 286), mail fraud (18 U.S.C. § 1341), and identity theft (18 U.S.C. § 1028) in case number 0:11-cr-60135-COHN-1.

On or about March 22, 2012, R.S. was sentenced to 65 months' incarceration on these charges.

10. On or about June 16, 2011, H.H. met with law enforcement and provided information about Ahmad, his brothers, and the cashing of fraudulently obtained Treasury checks. Specifically, H.H. stated that she has known Ahmad's brother, R.S., for approximately six months (prior to the date of the debrief in June) and was introduced to R.S. through her boyfriend. H.H. positively identified R.S. from his Florida issued driver's license picture. H.H. reported that R.S. recruited her to open Regions Bank checking/savings accounts to launder U.S. Treasury checks that R.S. and others obtained by filing fraudulent federal tax returns. R.S. provided H.H. with all of the U.S. Treasury checks that she deposited into the Regions Bank accounts. R.S. also gave H.H. photocopies of the supposed "account holders" driver's licenses so that H.H. had identification matching the names on the Treasury checks. After opening the bank accounts, H.H. would provide R.S. with the account information, including the starter checks and withdrawal slips. H.H. further told law enforcement that R.S.'s brothers M.A., Nedal Ahmad, and S.H. are all involved in the scheme to defraud the U.S. Treasury Department. On at least one occasion, H.H. witnessed R.S. and others exchange U.S. currency for a fraudulent Treasury Check while at Empire Street Wear.

11. The continuing investigation has confirmed that the suspects in this case typically obtain personal information (names, dates of birth, and social security numbers) of deceased persons through a website called "RootsWeb.ancestry.com" or from insiders working at places such as hospitals and nursing homes who steal patients' personal information. Conspirators use this information to file fraudulent Internal

Revenue Service (IRS) tax returns through Turbo Tax. TurboTax is an online tax return preparation service based in San Diego, California. Turbo Tax provides individual tax payers with software programs to calculate and file their tax returns online. Once completed, Turbo Tax allows individuals to specify their preferred method of receipt if they are due a tax refund. The conspirators in this investigation primarily request fraudulent tax refunds in one of two ways: a) to be issued a U.S. Treasury check in a persons' name other than their own; or b) to be issued a preloaded debit cards.

12. On or about July 6, 2011, I sent an official request to the USSS' Criminal Investigative Division (CID) for four (4) spurious U.S. Treasury Checks. These checks are actual U.S. Treasury checks and used by the USSS primarily for two reasons: a) to obtain incriminating evidence on collusive merchants and other individuals involved in similar fraudulent activity; and b) to track the actual location where the check is being negotiated. I requested the spurious Treasury checks in the following fictitious names and addresses:

a. Payee: Robert Johnson
4134 Dolphin Drive
Tampa, FL 33617
Type: Tax refund check
Issue Date: 07/08/11
Amount: \$608.78

b. Payee: Ryan Henderson
8512 N. 10th Street
Tampa, FL 33604
Type: Tax refund check
Issue Date: 07/08/11
Amount: \$1,012.57

c. Payee: Jeremy Whitlock
8510 N. 12th Street
Tampa, FL 33604
Type: Tax refund check
Issue Date: 07/08/11
Amount: \$1,381.12

d. Payee: Anthony Crofton
1760 W. Saint Louis Street
Tampa, FL 33607
Type: Tax refund check
Issue Date: 07/08/11
Amount: \$1,497.53

15. On or about July 14, 2011, TPD Detectives S. Augeri and J. Baxter met cooperating defendant R.J. at TPD's District 3 Office in Tampa, FL. R.J. stated that he could negotiate fraudulent federal tax refund checks and prepaid debit cards at several businesses in Tampa, FL. R.J. acknowledged that the fraudulent federal tax refund checks and prepaid debit cards were being cashed/redeemed by "Nasser" at Advanced Auto Sales, which is located at 5018 N. 22nd Street, Tampa, FL in the Middle District of Florida. Investigation has revealed that the registered owner of Advanced Auto Sales is Nasser Khalil Ali. R.J. has had a casual relationship with Nasser for approximately three (3) years. R.J.'s prior arrest history is as follows: aggravated battery, eluding police, and numerous counts of dealing and possession of drugs. R.J. is currently awaiting sentencing for federal narcotics charges. R.J. has not received any monetary compensation for this information.

16. On or about July 29, 2011, Detective Augeri met cooperating defendant R.J. at TPD's District 3 Office. R.J. went to Advanced Auto Sales for the purpose of arranging to negotiate fraudulent tax refund checks at the auto store. Once there, Nasser told R.J. that since U.S. Treasury checks were difficult to negotiate, there was

not enough money to "make it worth his while." Nasser referred R.J. to a "friend" of his that owned a clothing and check cashing store on E. Fletcher Avenue and N. 20th Street called "Empire." Nasser further stated that the individual at Empire would negotiate the Treasury checks for R.J. Nasser provided R.J. with his "friend's" cell phone number and told R.J. to tell him that Nasser had sent him. At this point, Nasser had R.J. call his "friend" to arrange the negotiation of the U.S. Treasury checks.

17. On or about August 3, 2011, R.J. was supplied with spurious U.S. Treasury check numbers 2049 48455758, 2049 48455755, and 2049 48455756 at TPD's District 3 Office in Tampa, FL. While at TPD, R.J. was given audio and video recording devices to record the transaction at Empire Street Wear. R.J. then traveled to Empire Street Wear, which is located at 1925 E. Fletcher Avenue, Tampa, FL in the Middle District of Florida

18. While inside Empire Street Wear, R.J. met with Nedal Faisal Ahmad at the front of the store near the cash registers. After a brief conversation, Nedal agreed to negotiate spurious U.S. Treasury check #'s 2049 48455758, 2049 48455755, and 2049 48455756 (valued at \$3,002.47) and keep the balances of each in exchange for giving R.J. \$500.00 in U.S. currency and a pair of men's size 10 Nike Air Force 1 sneakers. During the transaction, Ahmad commented that "nobody wants to fuck with this," meaning that other collusive merchants were scared to negotiate U.S. Treasury checks since convenience store operator K. K. had been arrested for the same conduct. Ahmad further explained that if R. J. had additional U.S. Treasury checks, Ahmad would negotiate them for him. At the completion of the transaction, Ahmad placed the U.S. currency inside the Nike shoe box and handed it to R.J. At no time during the

transaction did Ahmad ask for forms of identification to match the Treasury Checks he accepted. It should be noted that the spurious U.S. Treasury checks that Ahmad negotiated were issued in three different fictitious names (Ryan Henderson, Robert Johnson and Jeremy Whitlock).

19. R.J. positively identified Ahmad from his Florida driver's license picture as the person that negotiated the spurious U.S. Treasury checks.

20. Based upon the foregoing and other evidence, the USSS obtained and executed a federal search warrant at Empire Street Wear on or about September 1, 2011. During the search, agents recovered \$19,887 in cash, \$58,306.40 in money orders, and \$119,887 in U.S. Treasury checks that resulted from the filing of fraudulent tax returns, as well as personal checks, driver license images, tax records, and other various items pertaining to AHMAD and his fraudulent tax refund cashing scheme. The USSS also found an abundance of trademarked apparel such as jackets, shirts, tennis shoes and other various items displayed inside the Empire Street Wear business that appeared counterfeit.

21. Based on the facts set forth in this affidavit, your affiant has probable cause to believe that the following property seized pursuant to the search warrant is subject to criminal forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), which provide for the criminal forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to mail fraud, in violation of 18 U.S.C. § 1341:

<u>ASSET ID</u>	<u>ASSET DESCRIPTION</u>	<u>ASSET VALUE</u>
318-2011-031-0001	\$19,968.51 in U.S. Currency	\$19,968.51
318-2011-031-0021	Western Union Money Order	\$50.00
318-2011-031-0022	Western Union Money Order	\$250.00
318-2011-031-0023	Two (\$275.00) Western Union Money Orders	\$550.00
318-2011-031-0024	Western Union Money Order	\$300.00
318-2011-031-0025	Western Union Money Order	\$360.00
318-2011-031-0026	Western Union Money Order	\$369.70
318-2011-031-0027	Six (\$400.00) Western Union Money Orders	\$2,400.00
318-2011-031-0028	Western Union Money Order	\$425.00
318-2011-031-0029	Two (\$450.00) Western Union Money Orders	\$900.00
318-2011-031-0030	Two (\$486.25) Western Union Money Orders	\$972.50
318-2011-031-0031	Western Union Money Order	\$489.20
318-2011-031-0032	Four (\$490.00) Western Union Money Orders	\$1,960.00
318-2011-031-0033	Two (\$200.00) MoneyGram Money Orders	\$400.00
318-2011-031-0034	Two (\$300.00) MoneyGram Money Orders	\$600.00
318-2011-031-0035	MoneyGram Money Order	\$80.00
318-2011-031-0036	Nine (\$1,000.00) MoneyGram Money Orders	\$9,000.00
318-2011-031-0037	121 (\$500.00) MoneyGram Money Orders	\$60,500.00
318-2011-031-0038	25 (\$500.00) Western Union Money Orders	\$12,500.00
318-2011-031-0039	MoneyGram Money Order Payayable to Eldred Lewis	\$500.00

22. On or about October 7, 2011, SA Condon (NYC-USSS) contacted your affiant with information pertaining to suspect Nedal AHMAD. According to SA Condon, a source, CI #12-36, came to the New York Field Office (NYFO) with information regarding the suspected illegal activity of an associate of his/her named "Nader," later identified by CI #12-36 as Nedal Faisal AHMAD. CI #12-36 has had a business relationship with Ahmad for approximately three (3) years. CI #12-36's prior arrest

history is as follows: disorderly conduct and possession of stolen property. CI #12-36 has not received any monetary compensation to date in exchange for his cooperation with law enforcement.

23. CI #12-36 owns a clothing distribution business that supplies Ahmad with clothing and apparel that Ahmad sells at Empire and other stores. Approximately one year ago, Ahmad asked CI #12-36 if he/she was interested in negotiating fraudulently obtained U.S. Treasury Checks (T-Checks). At that time, CI # 12-36 declined to participate in the scheme proposed by Ahmad to defraud the U.S. Treasury Department. According to CI# 12-36, Ahmad recently began aggressively recruiting CI # 12-36 to negotiate T-Checks for him in New York. This renewed effort to have CI # 12-36 cash checks for Ahmad came shortly after the execution of the federal search warrant at Empire Street Wear.

24. On or about September 30, 2011, CI # 12-36 related the following information to SA Condon:

- a. Nedal Ahmad is obtaining fraudulent U.S. Treasury checks.
- b. CI # 12-36 owns a business that ships large amounts of counterfeit (CFT) clothing to buyers, including Ahmad.
- c. Approximately a year ago, one of CI # 12-36's Florida customers who he/she knows as "Nader" aka Abouwadaa (later identified as Nedal Ahmad), offered to pay for the counterfeit merchandise with fraudulently obtained T-Checks at an inflated price.
- d. Around the same time, Ahmad contacted CI #12-36 and asked CI # 12-36 whether he/she would be willing to negotiate T-Checks for a cut

if Ahmad shipped them to him/her, whether he/she would be able to cash them and return a percentage to Ahmad, and if CI # 12-36 knew of anyone else who would be willing to participate in this scheme.

- e. Ahmad frequently changed telephone numbers because he was concerned about law enforcement attention, but provided numerous contact numbers to CI #12-36, all of which have an 813 area code, including 813-843-2761, 813-900-3817, 813-850-1903, and 813-297-7004. A subpoena to Sprint PCS revealed that two these cellular telephone accounts were opened in the names of aliases, such as "Nasser Nasser" and "My Man My Man," but the telephone number 900-3817 is registered to an address where Ahmad rents two storage units.
- f. Ahmad had recently reapproached CI # 12-36 about negotiating fraudulently obtained T-Checks. Specifically, Ahmad advised that he could provide CI # 12-36 with approximately \$100,000 per week in T-Checks. Ahmad instructed CI # 12-36 that if he/she cashed the T-Checks, he/she could keep 40% of the face value of each check and return the remaining 60% to Ahmad.
- g. CI # 12-36 was introduced to Ahmad through an individual who he/she knows as Bahaat AKA "Moe." According to CI # 12-36, "Moe" is also in the counterfeit clothing business and has used T-Checks to pay his suppliers, "The Chinese." Moe is believed to reside at 8620 3rd Ave.,

Brooklyn, NY (NFI on Apartment) and owns a Black 500 Mercedes S-Class.

h. Both CI # 12-36 and Moe utilize Coast to Coast Shipping on Morgan Street, Brooklyn, NY, to ship their merchandise.

25. In addition to the information provided above, CI #12-36 provided law enforcement with a copy of a check he had received from Ahmad to pay for counterfeit merchandise CI #12-36 had previously sold to Ahmad. The check listed a business account, Al-Wafaa Trading Inc., with an address of 13025 Terrace Broke Place, Temple Terrace, Florida in the Middle District of Florida. The check was written on a Wells Fargo Bank number ending in 0633. The check was mailed in an envelope with a return address of Hood Fashion, 1951 W. Silver Springs Blvd, Ocala, Florida.

26. Documents provided by Regions Bank Corporate Investigator D.W. show that CI #12-36's business received thousands of dollars from numerous bank accounts opened by H.H. and funded with fraudulently obtained Treasury Checks. All of the checks that went into these accounts were provided to H.H. by Ahmad's brother, R.S.

27. On or about October 4, 2011, SA Condon spoke with R.V., Wells Fargo Investigations, regarding an Al-Wafaa account ending in 0633. R.V. advised that Al-Waffa Inc. has two (2) bank accounts with Wells Fargo, ending in 0674 and 0633, both of which were opened on August 11, 2011, and are in the name of: Nedal F. Ahmad, SS# XXX-XX-5081, DOB 3/20/1977.

28. Based upon the foregoing, the USSS began an undercover operation to record conversations with Ahmad and obtain additional fraudulent Treasury Checks from him. Acting under the instructions of law enforcement, CI # 12-36 agreed to

accept a single Treasury check from Ahmad and attempt to negotiate it as a test case. CI # 12-36 also agreed to tell Ahmad that he had a friend from Michigan who would be negotiating the checks for them. The "friend from Michigan" is actually an undercover U.S. Secret Service agent (UC) who is fluent in the Arabic spoken by Ahmad and the CI.

29. On or about October 3, 2011, SA Condon spoke with CI # 12-36 again. CI # 12-36 reported that he spoke with Ahmad over the telephone who was inquiring if he/she had received the sample T-Check Ahmad mailed to him/her in New York. On or about October 4, 2011, CI # 12-36 provided SA Condon with the actual check that Ahmad had mailed him as well as a photocopy of a supposed Florida driver's license that matched the intended recipient of the Treasury Check. The following are the identifiers of that T-Check:

T-Check: #3158 00470460
Date: 8/19/2011
Payee: Carol Swisher
3905 N. Clearfield Ave.
Tampa, FL 33603-4605

Amount: \$9,803.00

30. SA Condon also received a photocopy of a Florida DL #S363-847-56-223-0: Carol Swisher (DOB 02/27/1977), 3905 N. Clearfield Ave, Tampa, FL 33603. Based upon this individual's name, driver's license number and date of birth, a search of records by law enforcement revealed that no such individual exists.

31. The return address on the envelope containing the T-Check was 1983 East Fletcher Ave, Tampa, Florida, which is on the same street and approximately one

block away from Empire Street Wear. The T-Check was shipped via the United Parcel Service, tracking #1ZR1705E0152221570.

32. On or about October 4, 2011, SA Condon spoke with R. Clay (CID), CFT Technician, regarding the subject T-Check. SA Condon also provided Clay with a copy of the T-Check via email. She stated that the numbers on the check appear to be legitimate. There is no record, however, of the payee. USSS has concluded, therefore, that the Treasury Check was most likely a legitimate check that was altered.

33. On or about October 5, 2011, CI # 12-36 advised SA Condon that he shipped counterfeit goods to Nedal Ahmad at 9505 N. Florida Ave, Tampa, FL 33612. Investigation has shown that this address is a U-Haul Storage facility where Ahmad has leased two storage units. In addition, at least one of the cellular telephone numbers used by Ahmad to communicate with CI # 12-36 is registered to the address of these storage units.

34. On or about October 14, 2011, CI # 12-36 met SA Condon at the USSS NYFO. CI # 12-36 made a consensually recorded telephone call to Ahmad at a telephone number with an 813 area code. During the call, Ahmad made the following statements:

- a. Ahmad stated that he is negotiating approximately \$200,000 worth of fraudulent Treasury Checks per week for various customers;
- b. Ahmad also stated that he has opened three check cashing businesses in Florida and utilizes them to negotiate fraudulently obtained T-Checks;

- c. Ahmad informed the CI of the percentage of the T-Checks that each participant in this check cashing endeavor would receive: 35% for "Michigan guy," 10% for CI # 12-36, and the remaining 55% for Ahmad;
- d. Ahmad confirmed that telephone number 813-297-7004 was a good contact number for him;
- e. Ahmad further stated that he would rather not supply the fraudulent identification to match the T-Checks he was supplying but if he did, the percentage to the "Michigan guy" would only be 25% of the face value of the T-Check;
- f. Ahmad told CI #12-36 to utilize Wells Fargo or Wachovia Banks when negotiating the checks because they don't "check for the fraud," and to definitely not use Bank of America;

35. On or about October 15, 2011, CI # 12-36 informed SA Condon that Ahmad agreed to mail him/her a larger shipment of fraudulently obtained T-Checks than originally agreed upon and that Ahmad would be willing to meet with CI #12-36 and his friend from Michigan (the UC).

36. On or about October 20, 2011, CI # 12-36 forwarded SA Condon a text message that he/she received from Ahmad. The message read as follows: "Bank of america. xxxxxx5309. Nedal ahmad. Florida." CI # 12-36 stated that Ahmad had requested \$5,000.00 as payment for the "sample" T-Check he had already sent to the CI, which had a face value of \$9,803. On or about October 24, 2011, SA Hines (TPA –

USSS) confirmed with Bank of America that the account ending in 5309 belongs to Nedal Faisal Ahmad.

37. On or about October 24, 2011, law enforcement coordinated with Bank of America ("B of A") to wire transfer \$4,000.00 worth of funds as an "Out of State Counter Deposit" to B of A account ending in 5309 as payment for the test T-Check Ahmad send the CI and the CI supposedly was able to negotiate for a percentage of the face value of the \$9,803 check. The counter deposit was disguised to appear to Ahmad as if it originated outside the state of Florida, as Ahmad believes the CI is negotiating the checks in New York and/or Michigan. On the same date, USSS SA Phil Hines confirmed with Bank of America that the account ending in 5309 received the \$4,000. Ahmad verbally acknowledged receiving this money in a conversation with the CI.

38. On or about October 31, 2011, CI #12-36 went to the USSS NYFO and met with SA's Condon and SA Khoury, who was working in an UC capacity as "Samir" from Michigan. SA's Condon and Khoury debriefed CI #12-36 at length. During the debrief, CI # 12-36 further explained the T-Check scheme, his/her relationship with Ahmad and positively identified Ahmad from his issued Florida driver's license picture. At 1606 hrs, CI# 12-36 placed a consensually monitored telephone call to (813) 297-7004, Ahmad's cell phone number. The call lasted approximately three (3) minutes. CI # 12-36 advised Ahmad that he/she was having coffee with his/her friend from Michigan. CI # 12-36 told Ahmad that his/her friend wanted T-Checks along with matching identification. Ahmad advised CI # 12-36 that providing the matching identification was no longer possible. At this point, Ahmad advised that something had come up and he had to end the conversation. This call was consensually monitored.

39. It should be noted that on or about October 25, 2011, Ocala Police Department patrol officer Dana Brown was arrested on a federal complaint that charged him with conspiracy to defraud the government, identity theft, and fraud and related activity in connection with computers. Based on information in the complaint, Brown used his access to state law enforcement databases in order to provide fake identification to collusive merchants and tax fraudsters who sought to negotiate fraudulently obtained Treasury Checks in the names of third parties. Law Enforcement has probable cause to believe Brown worked with Ahmad and his brother, R.S., in providing fake identification for their Treasury Check cashing activities in the Middle District of Florida but, once Brown was arrested, their source of false identifications to match the checks was disrupted.

40. At approximately 2013 hrs, on or about October 31, 2011, CI # 12-36 contacted SA Condon and stated that Ahmad had just called him. According to CI # 12-36, Ahmad was inquiring as to the trustworthiness of "Samir," the alias used by the UC. Additionally, Ahmad stated to CI # 12-36 that he had not heard from his "guy" who he deals in T-Checks in several days, which Ahmad thought was odd. Ahmad also questioned CI # 12-36 if anybody was asking him/her questions about the T-Checks or check cashing scheme. Ahmad finished the conversation with CI # 12-36 by saying he would be in contact soon regarding working directly with Samir. CI # 12-36 commented to SA Condon that Ahmad sounded very nervous on the telephone.

41. On or about November 1, 2011, at approximately 1403 hrs, CI # 12-36 contacted SA Condon regarding a recent conversation he had with Ahmad. During the call, Ahmad reportedly asked the CI if the guy from Michigan was still interested in

negotiating fraudulently obtained T-Checks. Ahmad advised that he was no longer able to obtain matching identification for the T-Checks but wanted to know if "Samir" was still interested in cashing the T-Checks without the identification. Again, Ahmad asked CI #12-36 if anyone has contacted him/her about the checks. CI # 12-36 told Ahmad that nobody had contacted him/her and he/she would let him know if anyone began asking questions. CI # 12-36 asked Ahmad if everything was ok. Ahmad stated that he was still unable to contact his guy who he deals with regarding the fraudulently obtained T-Checks. Ahmad ended the conversation by telling CI #12-36 that he would ship T-Checks to him/her when he/she was ready as long as "Samir" still wanted to proceed. CI # 12-36 reported that Ahmad seemed extremely nervous on the telephone.

42. On or about November 3, 2011, CI #12-36 met SA Condon at the USSS NYFO. At approximately 1414 hrs, CI# 12-36 placed a consensually monitored telephone call to (813) 297-7004, Ahmad's cell phone number. During this conversation, CI # 12-36 told Ahmad that his/her friend Samir was interested in receiving approximately \$25,000 worth of T-Checks. CI # 12-36 explained to Ahmad that he/she wanted to begin with a smaller shipment initially to measure how effectively he/she could negotiate the T-Checks. Ahmad stated that he would send him/her three (3) T-Checks with an approximate value of \$27,000.

43. Additionally, CI # 12-36 provided SA Condon with information that Ahmad was scheduled to receive approximately seventy-eight (78) boxes of counterfeit apparel to his storage unit located at 9505 N. Florida Ave, Tampa, FL. CI # 12-36 stated that Coast to Coast Shipping would be delivering the apparel to Ahmad's storage unit. CI # 12-36 also provided SA Condon with a picture of one of the shipping labels as proof of

the delivery. Clearly visible on the label is: 4 Pallets, 78 boxes, Apparel, cell # 813-900-3817, 9505 N. Florida Ave, Tampa, FL 33612 and \$600.00.

44. On or about November 4, 2011, CI # 12-36 met SA Condon at the USSS NYFO and provided him with the United States Postal Service (USPS) Express Mail envelope (tracking # EG871276371US) that he/she received from Ahmad. The USPS envelope was addressed to "Red Star" 3811 Ditmars Blvd # 745, Astoria, NY 11105 with contact phone # 917-312-7215. The envelope was sent from "D Tampa" 3503 E. Hillsborough Ave, Tampa, FL 33610 with contact phone # 813-297-7004, which is one of Ahmad's cell phone numbers. The USPS envelope contained three (3) U.S Treasury Checks. The following are the identifiers of those T-Checks:

- g. T-Check: #2310 52687325
Date: 3/04/2011
Payee: DF
1601 Scott Street Apt 124D
Tampa, FL 33605-4832
Amount: \$9,795.00
*T-Check was supposedly endorsed by a "DF" with SSN ***-**-6550,
and has "white out" under the SSN.
- h. T-Check: #2310 67418066
Date: 4/22/2011
Payee: ADW
2926 W Pine St
Tampa, FL 33607-3204
Amount: \$9,655.00
**T-Check endorsement is not legible
- i. T-Check: #2310 69866233
Date: 4/29/2011
Payee: SAL
6906 Halifax River Dr Apt 101
Tampa, FL 33617-9027
Amount: \$9,650.00
***T-Check endorsement is not legible

45. Also on or about November 4, 2011, your affiant provided US Postal Inspector D. Tanner with a copy of the T-Checks and the USPS Express Mail Envelope with tracking number. On or about November 8, 2011, Postal Inspector Tanner retrieved the original USPS Express Mail Label (Tracking # EG871276371US), copy of the POS receipt, and surveillance video, related to the transaction conducted on or about November 3, 2011, from the Produce Station Post Office located at 2810 E Hillsborough Ave, Tampa, FL 33610. The POS receipt reveals USPS Express Mail Envelope (Tracking # EG871276371US) was sent from the Produce Station on November 3, 2011, and was paid for in cash. Your affiant has reviewed still photos from the video recovered from the post office. An individual matching Ahmad's description appears in the video. The video is currently being enhanced for further analysis. **(MAIL FRAUD COUNT)**

46. On or about November 22, 2011, CI #12-36 forwarded SA Condon a text message that he/she received from Ahmad containing his Wells Fargo account information for account number ending in 0633 in order to facilitate cash deposits.

47. On or about November 22, 2011, based on the agreement for payment between Ahmad and the CI, law enforcement coordinated with Bank of America to wire transfer \$9,000.00 as an "Out of State Counter Deposit" to Ahmad's Bank of America account ending in 5309 as payment for the most recent round of T-Checks. This was done to make the wire transfer appear to originate from a state other than Florida. During a subsequent telephone conversation with CI # 12-36, Ahmad acknowledged receiving this payment.

48. Shortly thereafter, CI # 12-36 advised Ahmad that he was having trouble negotiating the T-Check in the name of "DF" because it had white out underneath the endorsement line on the bank of the check.

49. On or about November 28, 2011, CI # 12-36 forwarded SA Condon a text message that he/she received from Ahmad instructing him/her to mail the T-Check with the "white out" on it back to Ahmad. The text message instructed the CI to mail the adulterated check back to Ahmad at "Al wafaa trading . 13025 terrace brook pl . Temple terrace FL 33637."

50. A search of records maintained by the Florida Department of State, Division of Corporations, revealed that Al-Wafaa Trading, Inc. became a registered "Florida Profit Corporation" on or about August 11, 2011, has a listed corporate mailing address of 13025 Terrace Brook Place, Temple Terrace, FL 33637, and lists the Officer/Director as Nedal F. Ahmad.

51. On or about November 29, 2011, at approximately 1337 hrs, CI# 12-36 received a call from Ahmad from telephone # 813-525-2694. Ahmad advised CI # 12-36 to return the T-Check with the "white out" on it via regular US Mail. CI # 12-36 advised Ahmad that his/her friend from Michigan was interested in obtaining approximately \$100,000 to \$150,000 in fraudulently obtained T-Checks and that he wanted to meet Ahmad in person in Florida. Ahmad was resistant to meeting in person saying it was safer for all parties if they just used the U.S. mail to send the T-Checks. Ahmad also stated that he had the T-Checks ready and would wait to hear from CI # 12-36 before he mailed them. This consensually monitored telephone call lasted approximately three minutes.

52. On or about December 2, 2011, CI #12-36 received a package from Ahmad delivered via the U.S. Postal Service containing six treasury checks valued at \$56,761.34. The package was sent to "Red Star" in New York from 3503 E. Hillsborough Ave, Tampa, FL 33610, with a telephone number of 813-525-2694, which is one of Ahmad's cellular telephone numbers.

53. On December 14, 2011, United States Magistrate Judge Mark A. Pizzo authorized a seizure warrant based on the above facts in case number 8:11-mj-1622MAP for the contents, up to \$13,000 in Bank of America account ending 5309 in the name of Nedal Faisal AHMAD, on the basis that the contents of that account were subject to civil seizure and forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) as proceeds traceable to bank fraud, identity theft, and a conspiracy to commit the same. The seizure warrant was executed by your affiant, and probable cause exists to believe that the seized funds are also subject to criminal forfeiture in this case under 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) as property that constitutes or is derived from proceeds traceable to mail fraud, in violation of 18 U.S.C. § 1341.

CONCLUSION

54. Based on the above facts, your affiant submits that probable cause exists to that from in or around 2011, through the present, Nedal Ahmad has engaged and attempted to engage in a scheme to defraud the United States Treasury and, in doing so, used or caused to be used the U.S. Mail and commercial carriers.

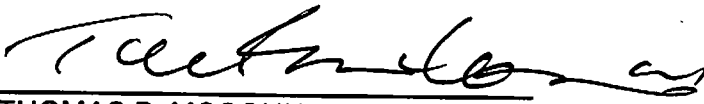
Thus, your affiant respectfully requests that this Court issue an arrest warrant pursuant to 18 U.S.C. § 1341.

This completes my affidavit.



S. JASON KROUT
Special Agent
United States Secret Service

Sworn to and subscribed before me
this 23 day of March, 2012.



THOMAS B. MCCOUN, III
United States Magistrate Judge