

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Noah Pittman, having been first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I have served as a Special Agent since February of 2016 after completing the FBI Academy at Quantico. Before my career as a Special Agent, I served eleven (11) years of active duty with the Air Force as a medic. I am currently assigned to the FBI's St. Louis Division investigating various criminal matters including financial schemes to defraud.

2. The statements contained in this affidavit are based on this affiant's personal knowledge and information provided to this affiant by other law enforcement officers, including Special Agent Eric Mills. SA Mills is currently in California investigating the matter and has been informing me of updates in the case.

3. As described in this affidavit, I have probable cause to believe Yi Liu and others are involved in a false and fraudulent scheme to defraud Enterprise Holdings, a St. Louis, Missouri-based company, and have transmitted or caused to be transmitted a wire communication in interstate or foreign commerce for the purpose of executing such scheme.

4. The investigation has revealed that St. Louis, Missouri-based Enterprise Holdings is parent company of the Enterprise, Alamo, and National car rental brands. Enterprise operates a prepaid rental program for consumer-direct prepaid rentals for European travelers. These reservations come in through www.alamo.co.uk, www.nationalcar.uk, and other European branded websites. The renter pays for the entire rental in advance, receives a voucher, and presents it to the rental branch at the time of rental for prepayment.

5. The investigation further revealed in December, 2016, Enterprise noticed a high volume of credit card charge-backs tied to prepaid rentals purchased on the aforementioned European websites. Enterprise discovered persons operating the website "www.tomrental.com" were representing themselves to be a volume-purchaser of Enterprise/Alamo/National prepaid car rentals, taking orders for the prepaid rentals over the internet from Chinese travelers planning a trip to the United States, and then meeting that demand by purchasing prepaid vouchers using stolen credit card numbers. Enterprise's Security and Investigations department believes that from approximately May 2016 until present, the company has suffered a loss of approximately \$600,000.00 due to Tom Rental's fraudulent purchase and resale of car rental vouchers.

6. In the course of this investigation, SA Mills obtained and reviewed records from Wix.com, a company that registers website domains. On or about June 20, 2016, the domain name "www.tomrental.com" was registered by J [REDACTED] H [REDACTED] residing at 30637 Rue de la Pierre, Rancho Palos Verdes, California.

7. SA Mills researched the property known as 30637 Rue de la Pierre, Rancho Palos Verdes, California, and found it is owned by a man living in Virginia whose name is abbreviated as R.F. SA Mills interviewed R.F. who explained he and his wife purchased the house in Rancho Palos Verdes, California with the intention of moving there from Virginia to retire, but have been renting it in the meantime. R.F. said he rented the house in August, 2014, to two men, one of whom was named Yi Liu. R.F. further explained Yi Liu referred to himself as "Ronnie."

8. SA Mills reviewed a copy of Yi Liu's Application to Rent the house and observed the following:

- The phone number Liu listed on his house rental application was (818) 793-2299.

- The email address Liu listed on the house rental application was “gmgronnie@gmail.com.”
- A vehicle Liu listed on the house rental application was a white 2014 Audi S8, California license 7DNE764.
- The Emergency Contact Liu listed on the house rental application was a man named D■■■■ D■■■■.
- A bank account Liu listed on the house rental application was Chase Bank account ending “9316”.
- A copy of a Chinese passport was included as part of the home rental application. The passport picture shows Yi Liu, aka “Ronnie,” and lists the name Yi Liu and lists a date of birth of January 30, 1989.

9. SA Mills researched a property known as 1838 263rd Street, Lomita, California, and found it is owned by a man living in southern California whose name is abbreviated S.A. SA Mills interviewed S.A. who explained from July 2015 until July 2016, he rented his house to a Chinese man named J■■■■ “Ronnie” H■■■■.

10. SA Mills reviewed a copy of J■■■■ “Ronnie” H■■■■’s application to rent the house and observed the following:

- The date of birth J■■■■ “Ronnie” H■■■■ listed on his house rental application was ■■■■/1985.
- The social security number J■■■■ “Ronnie” H■■■■ listed on his house rental application was XXX-XX-5010.

- The phone number J [REDACTED] "Ronnie" H [REDACTED] listed on his house rental application was (818) 793-2299.
- The email address J [REDACTED] "Ronnie" H [REDACTED] listed on the house rental application was "gmgronnie@gmail.com."
- A vehicle J [REDACTED] "Ronnie" H [REDACTED] listed on the house rental application was a white 2014 Audi S8, California license 7DNE764.
- The Emergency Contact J [REDACTED] "Ronnie" H [REDACTED] listed on the house rental application was a man named D [REDACTED] D [REDACTED].
- A bank account Liu listed on the house rental application was Chase Bank account ending "9316".
- A copy of a Chinese passport was included as part of the home rental application. The passport picture shows Yi Liu, aka "Ronnie," however, it lists the name "J [REDACTED] H [REDACTED]" and lists a date of birth of [REDACTED], 1985.

11. Enterprise Holdings provided the FBI a list of approximately 10 email addresses, which were used by those purchasing Enterprise/Alamo/National prepaid car rentals using stolen credit cards. Among those email addresses was "ronnieliu64@gmail.com."

12. SA Mills obtained and reviewed records from Google pertaining to a Google account associated with the email address "ronnieliu64@gmail.com." Google confirmed the email address "ronnieliu64@gmail.com" is subscribed to a person named Ronnie Liu. The phone number associated with Ronnie Liu's Google account is (818) 793-2299.

13. SA Mills obtained and reviewed records from Citibank. There exists a Citibank checking account ending in "3261" in the name of J [REDACTED] H [REDACTED]. From January 2016 until

approximately July 2016, the address associated with the account was 30637 Rue de la Pierre, Rancho Palos Verdes, California. In approximately July 2016, the mailing address associated with the Citibank account belonging to J [REDACTED] H [REDACTED] was changed to 157 Pavilion Park, Irvine, California.

14. SA Mills analyzed records provided by Citibank for the account ending in "3261" belonging to H [REDACTED] and found that from approximately May 2016 until February 2017, deposits totaling approximately \$382,000.00 were made into H [REDACTED]'s account in four ways: international wire transfers, ACH transfers, over-the-counter cash deposits, and handwritten check deposits. A sampling of memo lines of checks which SA Mills reviewed include, "Alamo Car Rental"; Rent Car"; "Deposit for Rental Car"; and "Car Rental Feb, March."

15. In further review of the Citibank account ending in "3261" belonging to H [REDACTED], SA Mills found the following:

- On June 24, 2016, debit card payments of \$9.90 and \$149.50 were made to Wix.com
- On August 10, 2016, check #1026 in the amount of \$4,000.00 was hand-written to "Chinese New Media LLC." The check contained the memo, "Advertising for Tom Rental."
- On September 27, 2016, check #1030 in the amount of \$164.00 was hand-written to "ChineseInLA.com." The check contained the memo, "Tom Rental."

16. On October 11, 2016, check #1176 in the amount of \$1,680.00 was hand-written to "ChineseInLA.com." The check contained the memo, "Ad for Tom Rental."

17. Wix.com also provided the FBI a list of Internet Protocol (IP) addresses which have been used to access and manage the TomRental.com web domain. Among the IP addresses listed were

two issued by internet service provider Cox Communications. SA Mills obtained and reviewed records from Cox Communications and found the following for the two IP addresses:

- 68.4.106.23 has over the time period during which the fraud against Enterprise Holdings has taken place been subscribed to a user living at 157 Pavilion Park, Irvine, California. The phone number associated with that user's Cox account is (818) 793-2299.
- 68.4.106.171 has over the time period during which the fraud against Enterprise Holdings has taken place been subscribed to a user living at 157 Pavilion Park, Irvine, California. The phone number associated with that user's Cox account is (818) 793-2299.

18. SA Mills has reviewed immigration records for Yi Liu provided to the FBI by a Special Agent from the U.S. Department of Homeland Security, which indicate Liu has during several immigration interviews provided (818) 793-2299 as his contact phone number.

19. The FBI obtained and analyzed records from the California Department of Motor Vehicles pertaining to J [REDACTED] H [REDACTED], date of birth [REDACTED]/1985, social security number XXX-XX-5010, and found there is an Asian female named J [REDACTED] H [REDACTED] having the stated date of birth and social security number residing in the Oakland, California area. The FBI believes that Yi Liu, aka "Ronnie," used J [REDACTED] H [REDACTED]'s identity to further his scheme to defraud Enterprise and to attempt to conceal his real identify on the rental home application and on the Citibank bank account that was collecting the proceeds of the scheme.

20. The statements contained in this affidavit are based upon an FBI investigation; SA Mills review of information provided by Enterprise Holdings, Wix.com, Cox Communications, Google, and Citibank; interviews FBI agents have conducted; and on my experience and training as a Special Agent of the FBI. Since this affidavit is being submitted for the limited purpose of

obtaining a Criminal Complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts I believe are necessary to establish probable cause to believe Yi Liu has committed violations of Title 18, United States Code, Sections 371 (Conspiracy), 1028A (Aggravated Identity Theft), and 1343 (Wire Fraud).