

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ALAN H. GOLD

CASE NUMBER:
UNDER SEAL

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From on or about January 1, 2010 to on or about January 1, 2015, at Wilmette, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 1343

Offense Description

engaged in a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises and by concealment of material facts, and, for the purpose of executing such scheme, caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely an interstate wire transfer of \$10,000 from the account of Client B to an account of defendant on or about February 19, 2014

This criminal complaint is based upon these facts:

 X Continued on the attached sheet.

BRENT POTTER
Special Agent, Federal Bureau of
Investigation (FBI)

Sworn to before me and signed in my presence.

Date: June 4, 2015

Judge's signature

City and state: Chicago, Illinois

JEFFREY T. GILBERT, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS) ss

AFFIDAVIT

I, Brent E. Potter, first being duly sworn under oath, hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”), assigned to the Chicago Field Division. I have been employed by the FBI as a Special Agent for over 18 years. During that time, I have conducted numerous financial fraud investigations and have obtained and served numerous search warrants, and conducted searches, in financial fraud investigations. At this time, I am assigned to an FBI squad dedicated to the investigation of federal wire and mail fraud offenses, as well as related financial crimes.

2. This affidavit is submitted in support of a criminal complaint and an application for the issuance of a search warrant. The information contained in this affidavit is based upon my personal knowledge, as well as information provided to me by other law enforcement officers. It is also based upon my review of records and interview of witnesses. Because this affidavit is submitted for the limited purpose of establishing probable cause for the criminal complaint and application for a search warrant, it does not set forth each fact that I have learned during this investigation.

3. This affidavit is made for the limited purpose of establishing probable cause to support: (A) a criminal complaint alleging that, from no later than January 1, 2010 and continuing through at least January 1, 2015, ALAN H. GOLD engaged in a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations,

promises and concealment of material facts, and, for the purpose of executing such scheme, caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals for the purpose of executing such scheme, in violation of Title 18, United States Code, Section 1343 (wire fraud); and (B) an application for the issuance of a warrant to search GOLD's residence at 125 Lockerbie Lane, Wilmette, Illinois 60091 (the "**Subject Premises**"), as described further in Attachment A, for evidence of violations of Title 18, United States Code, Section 1343.

4. As further stated below, there is probable cause to believe that GOLD engaged in a scheme to defraud his clients for at least five years through false statements and representations about his investment of his clients' funds. Specifically, there is probable cause to believe GOLD, who managed several million dollars of client funds, sent account statements to clients falsely representing that their assets were invested in certain stocks, real estate funds, futures contracts and other investment products, when GOLD had actually spent those client funds on his own personal expenses. To date, GOLD has defrauded his clients of at least \$1 million of investment funds.

I. Background

5. The FBI initiated an investigation of GOLD on or about May 14, 2015, based upon information that the FBI received that GOLD had engaged in a pattern of wire transferring funds from his investment management clients to a bank account used by GOLD for his business, Alan Gold & Associates, from at least April 17, 2012 through November 21, 2014. The information indicated that the amount wired by GOLD from the accounts of at least five clients was in excess of a total of \$500,000.

6. GOLD had been a registered General Securities Representative through the

Financial Industry Regulatory Authority (“FINRA”) and a registered Securities Agent and Investment Adviser with the Illinois Secretary of State Securities Department. Among the records examined by the FBI after initiating its investigation of GOLD were records maintained by FINRA. FINRA is a private corporation that acts as the largest independent regulator of the securities industry and member firms in the United States. FINRA operates under the regulation of the United States Securities and Exchange Commission, which has authorized FINRA to administer standard securities licensing exams, and to license, regulate and discipline individual securities brokers and investment advisers, as well as member brokerage firms and securities exchange markets in the United States financial industry. As part of its mission, FINRA maintains records of all its disciplinary actions taken against registered individuals and firms.

7. The FINRA records examined by the FBI indicated that GOLD became registered as a General Securities Representative in 1983 and had worked in the investment management industry from 1983 through 2007. According to FINRA’s records, GOLD was terminated from his last employer on or about September 6, 2007 for, among other things, violations of company policies regarding borrowing funds from customers’ accounts and having client mail sent to his branch office.

II. Information Obtained from GOLD

8. On or about May 14, 2015, I interviewed GOLD at his residence, which is the **Subject Premises**. Another FBI agent was present during the interview and assisted me that day. GOLD met us at his front door, invited us inside and said that he had been expecting law enforcement officers to show up at his residence for some time. GOLD agreed to a voluntary interview with us, which was subsequently conducted in his residence.

9. In summary, GOLD stated that he had taken up to “seven figures” in total wire transfers from as many as ten investor victims from as early as 2008 until late 2014. GOLD told us that, while his investor victims authorized the transfer of funds by GOLD from their brokerage accounts to his bank account, they did not authorize GOLD to spend their funds on his personal expenses, which he subsequently did after funds were wired to his bank account.

10. GOLD discussed his background with us. GOLD stated that he had worked in the securities brokerage industry for about thirty years, but he was fired from his last employer in approximately September 2007. GOLD said that he did not disclose his termination to his clients, and instead told them that he was starting his own firm, Alan Gold & Associates (“AGA”). GOLD asked clients to stay with him as investment advisory and brokerage clients, which many of them did. GOLD stated that, after his termination, he brought approximately \$5 million in total client assets with him to AGA and that he had approximately 10 to 20 clients.

11. According to GOLD, his clients all maintained securities brokerage accounts at Brokerage Firm A. GOLD stated that, after his termination from his last employment, he applied to Brokerage Firm A for third party on-line access to his clients’ brokerage accounts. GOLD said that Brokerage Firm A denied his request because of his termination. GOLD said that he subsequently asked his clients for their login information so that he could access their brokerage accounts directly online. GOLD said that his clients gave him their login information and he was therefore able to access their brokerage accounts on-line directly with Brokerage Firm A at any time thereafter.

12. GOLD stated that, beginning as early as 2008, he began telling his clients that he would make “alternative investments” on their behalf using funds that he would wire from their

brokerage accounts to a bank account owned by AGA. Based upon his representations, his clients agreed to the wire transfers. GOLD stated that he established this account in his own name, doing business as AGA, and that he was the sole signer on this bank account.

13. GOLD then transferred their funds into his AGA bank account, and spent the money on personal expenses. GOLD said that he concealed his use of his clients' funds by periodically issuing them false AGA account statements, which indicated that the clients owned various investments in securities, real estate and futures contracts, none of which were actually owned by them. GOLD said that he continued this pattern until approximately December 2014 and stopped voluntarily because of his overwhelming feelings of guilt at defrauding his clients. GOLD further stated that his theft of client funds were his family's only significant source of income from about 2008 to 2014. GOLD stated that, as of May 14, 2015, he had spent all of the funds that he had taken from his investor victims, which could be as much as "seven figures" and that all of the funds were gone.

14. GOLD told us that he never had any intention of investing any of his clients' funds when he asked for their authorization to transfer funds from their brokerage accounts into his own Chase bank account. GOLD told us that his only intention was to use their funds to pay for his own "lifestyle" expenses. GOLD stated that he used some of his clients' funds for gambling at casinos, sometimes losing up to \$5,000 in a visit. GOLD also stated that he did not save any of the funds and that he had spent all of the money that he had transferred from his clients' brokerage accounts into his Chase account. GOLD said that he spent his clients' funds very rapidly after the money was transferred into his Chase account, and he needed to take more money from his clients on a regular basis in order to maintain his lifestyle spending.

15. GOLD told us that he issued his clients periodic account statements listing various fictitious investments in order to conceal his theft of their funds through his wire transfers from their brokerage accounts. While GOLD listed the values of his clients' Brokerage Firm A accounts and these values were accurate, none of the other investments listed on any of the AGA statements actually existed. GOLD told the agents that the only investments listed on the AGA statements that had any real value were the clients' Brokerage Firm A accounts. According to GOLD, everything else on the statements was fictitious. GOLD said that among the investments that he listed on the AGA statements were real estate ventures and holdings in registered securities. GOLD stated he printed the statements out and gave them to clients, usually in meetings at restaurants located near his clients' homes. GOLD stated that his only purpose in delivering these AGA statements to his clients was to keep them from inquiring about the funds that he had stolen from their Brokerage Firm A accounts.

16. GOLD specifically named Clients A and B as the clients from whom he had stolen the most money. GOLD did not recall exactly how much he had stolen from both victims, but he told us that it was over \$100,000 from each. GOLD stated that he had a meeting with Client B as recently as December 2014 in which he reassured him/her that everything would be all right with his/her investments, even though GOLD knew that this was false and that he had already spent Client B's funds.

17. GOLD also stated that he continued to take money from his clients' brokerage accounts and conceal the transfers with the AGA statements until 2014, when he "couldn't do it anymore" because he was "overwhelmed with guilt" over what he had done. GOLD stated that during his thefts of his clients' funds, he felt that it was "almost like an out of body experience" and

that he felt “physically ill” over his fraud against his clients. GOLD further stated, “I have a fucked up moral compass.”

III. Information Obtained from Client A

18. On or about May 19, 2015, I interviewed Client A, who resided in Arlington Heights, Illinois. Client A was a client of GOLD since approximately 2004. Client A started with GOLD while GOLD was employed as an investment adviser at his last employer. Client A stated that GOLD met with him/her in late 2007 at a restaurant and told him/her that GOLD was voluntarily leaving his employer to start his own firm, which would be known as AGA. GOLD told Client A that he/she was a valued client of GOLD and he would like him/her to stay on as a client with AGA. Client A agreed.

19. According to Client A, GOLD subsequently asked Client A for his/her passwords and login information for on-line access to his/her brokerage account through Brokerage Firm A, which Client A supplied. Client A stated that GOLD frequently asked him/her to authorize GOLD to wire transfer funds out of the brokerage account in order to purchase various investments on his/her behalf. Client A provided the FBI with copies of wire transfer confirmations issued on his/her brokerage account indicating that at least \$464,403 in wire transfers were made from the account between on or about March 10, 2010 through on or about March 17, 2014 to GOLD’s JP Morgan Chase Bank NA (“Chase”) account. Client A also provided the FBI with copies of four accounts statements issued to him/her by AGA between May 8, 2011 and October 14, 2013. The statements all bore the stylized logo “AG” within a circle and the name “Alan Gold & Associates,” and the address of the **Subject Premises**. This was the same address at which I conducted the interview of GOLD on or about May 14, 2015. The AGA statements contained the values of the

brokerage accounts of Client A, as well as what purported to be numerous other investments, including the stocks of Potbelly Corporation, Twitter and Facebook, and futures contracts in natural gas and gold. The most recent of the AGA statements provided by Client A to the FBI was dated October 14, 2013 and contained what purported to be various investments valued at \$442,806, over and above the value of Client A's brokerage accounts at Brokerage Firm A.

20. According to Client A, GOLD cut off communications with him/her in or around January 2015. For a period of several weeks, GOLD did not respond to Client A's e-mails or telephone calls, prompting Client A to report GOLD to the Arlington Heights Police Department on or about February 1, 2015. GOLD spoke by phone to Client A on one occasion on or about February 1, 2015, and GOLD said that "everything would be okay" with respect to his/her investments with GOLD. That was the last contact between Client A and GOLD.

IV. Information Obtained from Client B

21. On or about May 22, 2015, I interviewed Client B, a retiree and resident of Norridge, Illinois. He/she had been an investment advisory client of GOLD since approximately 2002. According to Client B, GOLD stated that in 2007 he was leaving his employer voluntarily in order to launch his own investment advisory firm known as AGA. Client B agreed to retain his/her client relationship with GOLD, who set up an account on his/her behalf at Brokerage Firm A. GOLD also asked Client B to provide him with his/her login information so that he could access the account on-line.

22. Client B stated that, beginning in around 2010, GOLD told Client B that his/her investments in the Brokerage Firm A account were not doing as well he wanted. GOLD told Client B that he could purchase better performing investments on his/her behalf outside of the

Brokerage Firm A account. According to Client B, GOLD subsequently began a pattern in which he asked for Client B's approval to make wire transfers out of his/her brokerage account into the Chase account of AGA. GOLD told Client B on each such occasion that he was making an investment purchase on Client B's behalf. GOLD provided Client B with at least nine account statements from about on or about March 31, 2010 through on or about December 16, 2014. Client B provided copies of those statements to me, and I observed that the account statements were in the same basic format as the account statements that GOLD provided to Client A. The first such statement, issued on March 31, 2010, showed what purported to be investments such as "AA Real Estate," "Amyris Biotechnology," "Maxis Communications" and "Associates Trading," with a total cost basis of \$117,864. Client B's most recent statement, dated December 16, 2014, showed what purported to be various non-brokerage account investments, including the stocks of Facebook, Potbelly Corporation, and Twitter, with a total cost basis of \$505,164.

23. Client B stated that GOLD cultivated a close personal friendship with him/her after GOLD left his employer in 2007. According to Client B, the two attended baseball games and often met for lunch or dinner. Client B stated that GOLD often used these mealtime meetings to provide Client B with a copy of his/her most recent AGA account statement. Client B's last contact with GOLD was a personal meeting on or about December 17, 2014 at a restaurant in the northern suburbs of Chicago. Client B stated that he/she became suspicious of GOLD at that meeting because GOLD asked him/her for a \$6,000 advance on GOLD's 2015 investment management fees charged to Client B.

24. Client B stated that, although GOLD and Client B maintained a close personal friendship for years, GOLD cut off all communications with Client B in January 2015. Although

Client B made numerous phone calls to GOLD and sent several e-mails to GOLD around that time, all went unanswered. According to Client B, he/she subsequently contacted the Norridge Police Department and reported fraud on the part of GOLD. Client B also hired an attorney, who had a letter demanding the return of Client B's funds personally delivered to GOLD's residence at the **Subject Premises**. According to Client B, he/she subsequently received a telephone call from GOLD's son in approximately February 2015. GOLD's son confirmed to Client B that GOLD had received the demand letter from Client B's attorney. In addition, GOLD's son advised Client B not to waste his/her money suing GOLD because "there isn't any money." GOLD's son told Client B that he would have to support his father because the latter had no money.

V. Preliminary Financial Analysis

25. Based upon the statements and documents provided to the FBI by Clients A and B, as well as GOLD's own statement to the FBI, the financial loss to Clients A and B alone is approximately \$1 million.

26. A preliminary examination by law enforcement of bank records pertaining to GOLD's Chase accounts confirmed that funds transferred from the Brokerage Firm A accounts of Clients A and B, among others, were deposited by GOLD in one of his Chase accounts. Gold spent the funds primarily on various personal expenditures, including regular large gambling expenses. There were no indications in his Chase bank statements that GOLD purchased any of the various investments enumerated in the AGA statements that he provided to his clients.

27. For example, GOLD's Chase account received three wire transfers in January 2012 from Client A, totaling \$37,000 and one wire transfer from Client B for \$10,000. GOLD's Chase account also received an additional \$8,500 wire transfer from yet another client during that time,

for a total of \$55,500 in deposits from GOLD's investment management clients. GOLD's account also received an additional \$30,511 in deposits from other sources, including cash deposits and online banking transfers. GOLD's Chase account began January 2012 with a balance of \$7,171. GOLD made no apparent purchases of investments on behalf of the clients during the month, but he did make at least \$34,713 in gambling payments, including on-line gaming and at an Illinois casino. GOLD also made a \$5,704 debit card purchase at a Chicago university, along with at least \$6,000 in additional personal debit card payments and ATM withdrawals. GOLD made \$26,960 in other withdrawals, primarily cash withdrawals or on-line transfers to a personal Chase checking account owned by Gold, where he also used the funds to make personal purchases. The ending balance for January 2012 in GOLD's AGA Chase account was \$13,194. GOLD could not have made these expenditures without the use of client funds transferred into his Chase account.

28. In another example, GOLD's Chase account took in \$61,915 in wire transfers during the month of March 2012 from his clients, including \$39,200 from Clients A and B. GOLD made an additional \$13,716 in ATM deposits during that time. GOLD's beginning balance in the account for the month was \$4,669. From the accounts statements, it appears that GOLD did not purchase any investments on his clients' behalf, but he did pay at least \$31,000 in gambling expenditures, plus another \$8,000 in ATM withdrawals and debit card purchases. GOLD also made an additional \$26,235 in other withdrawals, mostly in the form of transfers to his personal checking account, cash withdrawals and car payments. GOLD ended the month with a balance of \$9,757 in the account. GOLD could not have made these expenditures and withdrawals without the use of client funds transferred into his Chase account.

29. I have also reviewed an email from GOLD to Client B dated February 19, 2014 at approximately 9:45 a.m. that was provided to me by Client B. In the email, Gold stated: "I was absolutely convinced about Nat Gas which was \$5.23 last time I wrote you and is sitting at \$6 at the moment ... We need to continue to spend a little to lock in a lot. Cattle has also done well, although this gas thing is probably the single best investment of my 33 year career. I need \$10,000 to lock this in..." Approximately one hour later, Client B e-mailed back "Alan, go ahead with the \$10,000." In other words, GOLD told Client B that he wanted \$10,000 from him/her to purchase a security or futures contract involving natural gas. The bank records showed that GOLD subsequently wired \$10,000 from Client B's brokerage account to GOLD's Chase AGA account, which held a negative balance of -\$2,851 prior to the incoming wire from Client B. GOLD subsequently made \$2,460 in electronic transfers to his two sons and made a \$500 ATM withdrawal at a casino over the next several days. In addition, GOLD paid \$7,468 in gambling expenses over the next week after making a couple of ATM deposits to his account. There is no evidence in the bank records about investments purchased by GOLD that he represented in the email to Client B.

30. GOLD's Chase account statement for account ending in 8746 shows the above-mentioned wire transfer of \$10,000 on or about February 19, 2014. The wire transfer was from Client B's Wells Fargo Account, which held custody of Client B's funds on behalf of Brokerage Firm A, to GOLD's Chase bank account, which was in GOLD's name but also had a d/b/a under Alan Gold & Associates. The Chase bank statement stated that this wire transfer is a FEDWIRE. Based upon my previous interviews with representatives from the Federal Reserve Bank, I know that that a FEDWIRE transfer is an interstate wire communication that is processed

at the FEDWIRE processing center located in New Jersey.

VI. Request for Issuance of a Criminal Complaint

31. Based upon the foregoing information, there is probable cause to believe that, beginning no later than January 1, 2010 and continuing until January 1, 2015, GOLD devised, intended to devise and participated in a scheme to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations and promises, and by concealment of material facts, and for the purpose of executing that scheme, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce, certain signs, sounds and signals. In particular, for the purpose of executing the aforesaid scheme, and attempting to do so, GOLD knowingly caused to be transmitted by means of a wire communication in interstate commerce on or about February 19, 2014, an interstate wire transfer of \$10,000 from Client B's Wells Fargo Bank account to GOLD'S Chase account ending in 8746, in violation of Title 18, United States Code, Section 1343.

VII. Request for Issuance of a Search Warrant

32. There is also probable cause to believe that evidence of a violation of Title 18, United States Code, Section 1343, as further described in Attachment B will be located at the property located at the **Subject Premises**, as further described in Attachment A.

33. According to GOLD's statement to the FBI, he conducted the business of AGA entirely out of the **Subject Premises** since approximately 2007. GOLD told the FBI that he had never used any office or location other than the **Subject Premises** to run AGA, and the computer equipment from which he maintained the AGA website was located at the **Subject Premises**. GOLD told the FBI that AGA did not have any employees other than himself.

34. The false AGA statements that GOLD provided to his Clients A and B all bore the address of the **Subject Premises**. GOLD also told the FBI that he printed the AGA statements sent to this client on his computer prior to his meetings with clients, and handed the statements to clients in subsequent face to face meetings.

35. The FBI has examined the now-defunct website of AGA and found that it listed the **Subject Premises**, within the “contact” section of the website. GOLD told the FBI that he used the website to post AGA account statements on-line for his clients to view. GOLD also told the FBI that he operated and maintained the AGA website from the **Subject Premises** until its domain registration lapsed after GOLD failed to pay the renewal fee.

36. Based upon my training and experience in serving search warrants, and the training and experience of law enforcement officers with whom I have spoken, I am aware that individuals who run investment advisory businesses out of their homes often keep records related to that business in their homes. This financial information can include information in both electronic and paper form related to names of clients, client account statements, bank statements, brokerage statements, communications and correspondences with clients, and statements about total assets under management for each client. Similarly, based upon my training and experience, I am aware that individuals often store personal records in both electronic and paper form related to their personal finances in their homes, which can include personal bank account statements, personal brokerage statements, personal mortgage statements, and records relating to assets and liabilities and personal income and expenditures of funds.

Specifics Regarding Searches of Computer Systems

37. Based upon my training and experience, and the training and experience of

specially trained computer personnel whom I have consulted, searches of evidence from computers commonly require agents to download or copy information from the computers and their components, or remove most or all computer items (computer hardware, computer software, and computer-related documentation) to be processed later by a qualified computer expert in a laboratory or other controlled environment. This is almost always true because of the following:

- a. Computer storage devices can store the equivalent of thousands of pages of information. Especially when the user wants to conceal criminal evidence, he or she often stores it with deceptive file names. This requires searching authorities to examine all the stored data to determine whether it is included in the warrant. This sorting process can take days or weeks, depending on the volume of data stored, and it would be generally impossible to accomplish this kind of data search on site.
- b. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert should analyze the system and its data. The search of a computer system is an exacting scientific procedure which is designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to tampering or destruction (which may be caused by malicious code or normal activities of

an operating system), the controlled environment of a laboratory is essential to its complete and accurate analysis.

38. In order to fully retrieve data from a computer system, the analyst needs all storage media as well as the computer. The analyst needs all the system software (operating systems or interfaces, and hardware drivers) and any applications software which may have been used to create the data (whether stored on hard disk drives or on external media).

39. In addition, a computer, its storage devices, peripherals, and Internet connection interface may be instrumentalities of the crime(s) and are subject to seizure as such if they contain contraband or were used to carry out criminal activity.

Procedures to be Followed in Searching Computers

40. The warrant sought by this Application does not authorize the “seizure” of computers and related media within the meaning of Rule 41(c) of the Federal Rules of Criminal Procedure. Rather the warrant sought by this Application authorizes the removal of computers and related media so that they may be searched in a secure environment.

41. With respect to the search of any computers or electronic storage devices seized from the location identified in Attachment A hereto, the search procedure of electronic data contained in any such computer may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all of the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth herein;

- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth herein (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying various file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth herein;
- d. opening or reading portions of files in order to determine whether their contents fall within the items to be seized as set forth herein;
- e. scanning storage areas to discover data falling within the list of items to be seized as set forth herein, to possibly recover any such recently deleted data, and to search for and recover deliberately hidden files falling within the list of items to be seized; and/or
- f. performing key word searches through all storage media to determine whether occurrences of language contained in such storage areas exist that are likely to appear in the evidence described in Attachment B.

42. Any computer systems and electronic storage devices removed from the premises during the search will be returned to the premises within a reasonable period of time not to exceed 30 days, or unless otherwise ordered by the Court.

CONCLUSION

43. Based on the above information, I respectfully submit that there is probable cause to believe that wire fraud offenses, in violation of Title 18, United States Code, Section 1343, have been committed by GOLD, and that evidence relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Premises**, as further described in Attachment A, and therefore respectfully request that this Court issue a criminal complaint for

GOLD and a search warrant for the **Subject Premises** authorizing the seizure of the items described in Attachment B, pursuant to the protocol described in the addendum to Attachment B.

FURTHER AFFIANT SAYETH NOT.

Brent E. Potter
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me this 4th day of June 2015, at Chicago, Illinois.

The Honorable Jeffrey T. Gilbert
United States Magistrate Judge
Northern District of Illinois