

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA**

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**SEALED**

UNITED STATES OF AMERICA  
v.  
Abdul Mannan (DOB 11/9/82)

*Approved  
ASA MRS J  
6/29/15*

JUN 30 2015

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

**CRIMINAL COMPLAINT**

DEPUTY CLERK

**CASE NO.**

**2:15 - MJ - - 139 CKD**

I, R. Vazquez, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about each date set forth below, in the Eastern District of California, defendants, as indicated, (Offense Statutory Language) did violate federal law as follows

- Mannan, between about 3/5/2014 and to date (Counts 1-4), executed and aided and abetted a scheme to defraud, and attempted to defraud, federally insured financial institutions by means of materially false promises, representations, and pretenses, and

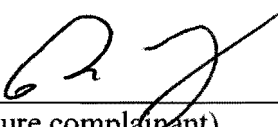
- Mannan, on 11/2/14 (Count 5) and on 11/5/14 (Count 6), knowingly used without authority means of i.d. of another in a bank fraud scheme in violation of 18 USC 1344(2) to defraud federally insured financial institutions by means of materially false promises, representations, and pretenses; and aided and abetted such

all in violation of Title 18, United States Code, Sections 2, 1344(2), and 1028A(a)(1).

I further state that I am a Postal Inspector with the US Postal Inspection Service in and for the Eastern District of California and that this complaint is based on the following facts:

- see attached Affidavit, fully incorporated herein

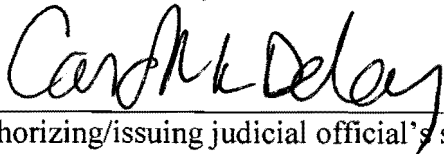
x Continued on the attached sheet and made a part hereof.



(signature complainant)

Ryan Vazquez  
Special Agent, DHS

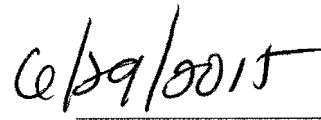
Sworn to before me, and subscribed in my presence at Sacramento, California.



(authorizing/issuing judicial official's signature)

C.K. Delaney, U.S. MAGISTRATE

(print authorizing/issuing judicial official's name and title)



(date)

**AFFIDAVIT**

I, Ryan Vazquez, being duly sworn on oath, depose and say the following.

1. I am a Special Agent with the Department of Homeland Security, United States Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), presently assigned to the Assistant Special Agent in Charge, Sacramento, California (ASAC/Sacramento). I have been employed as an HSI Special Agent (SA) for four years. I am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator Training Program and the ICE Special Agent Training Program. Prior to becoming an HSI Special Agent, I was employed as a Special Agent by the U.S. Environmental Protection Agency, Criminal Investigations Division and the U.S. Air Force, Office of Special Investigations for a combined seven years. Because of my training and experience, I am familiar with common methods of investigating Identity Fraud and Wire Fraud. My duties include the investigation of crimes related to financial crimes, cyber-crimes and bank fraud. I have received formal training from the Federal Law Enforcement Training Center in financial crimes, cyber-crimes and bank fraud. I have participated in investigations involving the financial crimes, cyber-crimes and bank & wire fraud as both Case Agent and assistant to other SAs. I am authorized to investigate violations of federal criminal law, including 18 U.S.C. 1344(2) (Bank Fraud) and 18 U.S.C. 1028A(a)(1), (Aggravated Identity Fraud).

2. The facts and conclusions in this affidavit are based on my personal knowledge gained from my participation in this investigation, my training and experience, and information gained from other Inspectors, Agents, local law enforcement, and field contacts and reports. Since this affidavit is submitted for the limited purpose of obtaining search and arrest warrants, I have not included all of the facts of which I am aware of in this investigation.

3. I believe that there is probable cause that Abdul Mannan (DOB 11/9/1982), committed, and aided and abetted, violations of federal criminal law including 18 USC 1344(2) (Bank fraud) and 18 USC 1028A(a)(1) Aggravated Identity Theft. For the reasons set forth herein, I request a complaint and arrest warrant be issued for Mannan for 4 counts of bank fraud and aiding and abetting in violation of 18 USC 2, 1344(2) and 2 counts of aggravated i.d. theft in violation of 18 USC 1028A(a)(1).

4. Beginning at a time unknown to the United States but at least starting on or about March 5, 2014 and continuing to date, Mannan, and others known and unknown to the United States, knowingly executed and attempted to execute a scheme and artifice to defraud federally insured financial institutions to obtain monies, funds, credits, assets, securities, and other property owned by and under the custody and control of these financial institutions, by means of false and fraudulent pretenses, representations, and promises. Mannan, working with others, obtained personal identifying information of others and used such to obtain unauthorized access devices (credit cards) on existing lines of credit and unauthorized lines of credit with accompanying access devices. Mannan then used the access devices to make purchases to obtain cash, goods,

and services. Mannan and others further executed the scheme by causing financial institutions to send via U.S. Mail and common carriers access devices bearing Mannan's name and access devices in the names of others to Mannan's residence at 2543 Fulton Ave. Apt. 132, Sacramento, CA. Mannan, after receipt of the access devices, used the devices, including by posing as the others, to obtain cash goods and services, all in violation of 18 USC 1344(2).

COUNT	DATE	Amount	Victim	DESCRIPTION
1	11/2/2014	\$1,301.76	Capitol One Bank	Mannan, posing as Steven L., conducted a fraudulent transaction using access device ending 7127
2	11/5/2014	\$18.82	Capitol One Bank	Mannan, posing as David A., conducted a fraudulent transaction using access device ending 9374
3	11/5/2014	\$192.10	Capitol One Bank	Mannan, posing as David A., conducted a fraudulent transaction using access device ending 9374
4	11/7/2014	\$140.27	Capital One Bank	Mannan, using an unauthorized access device in his own name, conducted a fraudulent transaction using David A.'s access device account ending 9374

5. **Count 1.** On 10/24/2014, Capital One received a credit card application in the name of Victim Steven L. using his SSN and Date of Birth. The address utilized for the account was Mannan's address (2543 Fulton Avenue Apartment 132, Sacramento, CA). Capital One approved the application and mailed the credit card (ending 7127) in Victim Steven L.'s name to Mannan's Fulton Avenue address. On 11/2/2014<sup>6:43 PM</sup> at approximately 4:43 PM, Mannan is depicted in surveillance images posing as victim Steven L. at a Sacramento Target Store to conduct a fraudulent transaction for \$1,301.76. Mannan, pretending to be Steven L., purchased three Apple iPad Minis (SN F4KN7DQTG5V1, F4KN7KRNG5V1, and F4KN85Y0G5V1). Later on 11/2/2014, at approximately 7:08 PM, the Capital One credit card account ending 7127 in the name of Steven L was accessed utilizing Internet Protocol (IP) 67.174.52.12. Comcast confirmed that IP address 67.174.52.12 was then assigned to Mannan at his Fulton Ave. residence.

6. **Counts 2, 3, and 4.** On 10/27/2014, Capital One received a credit card application in the name of Victim David A. using his SSN and Date of Birth. The address utilized for the account was Mannan's address (2543 Fulton Avenue Apartment 132, Sacramento, CA). Capital One approved the application and mailed the credit card (ending 9374) in Victim David A.'s name to Mannan's Fulton Avenue residence. **Count 2.** On 11/5/2014<sup>6:35 PM</sup> at approximately 6:35 PM, Mannan is depicted in surveillance images posing as victim David A. at a Sacramento Walmart Store to conduct a fraudulent transaction for \$18.82. **Count 3.** On 11/5/2014<sup>7:16 PM</sup> at approximately 7:16 PM, Mannan is depicted in surveillance images posing as victim David A. at a Carmichael Ross Store to conduct a fraudulent transaction in the amount of \$192.10. **Count 4.** On

11/5/2014<sup>4</sup> at approximately 11:05 PM Mannan was added to the unauthorized account in victim Davis A.'s name. The new credit card bearing Mannan's name was mailed to Mannan's residence at 2543 Fulton Ave, Apt. 132, Sacramento, CA. On 11/7/2014 at approximately 8:59 PM Mannan is depicted in surveillance images at a Sacramento Wal-Mart conducting a fraudulent transaction in the amount of \$140.27.

7. Count 5. In conducting the unauthorized transaction indicated in Count 1 above, Mannan working with others knowingly posed as another and used without authority means of identification of another. Specifically, Mannan, working with others, posed as victim Steven L. and used without authority the true name, SSN, and DOB of Steven L. to open a line of credit and to cause an access device (credit card) to be mailed to Mannan's Fulton Avenue residence. Mannan is depicted on 11/2/2014 in surveillance images using without authorization victim Steven L.'s name and signature in violation of 18 USC 1028A(a)(1).

8. Count 6. In conducting the unauthorized transactions indicated in Count 2 and 3 above, Mannan working with others knowingly posed as another and used without authority means of identification of another. Specifically, Mannan, working with others, posed as victim David A. and used without authority the true name, SSN, and DOB of David A. to open a line of credit and to cause an access device (credit card) to be mailed to Mannan's Fulton Avenue residence. Mannan is depicted on 11/5/2014 in surveillance images at Walmart and Ross using without authorization victim David A.'s name in violation of 18 USC 1028A(a)(1).

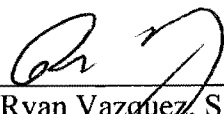
9. Based on my participation in this investigation, the records and documents in this case, my training and experience, my discussions with other law enforcement personnel in this investigation, and based on common sense, I am aware that Mannan and his associates have engaged in fraudulent activity directed upon at least two federally insured financial institutions (Capital One Bank and Discover Bank). The conduct involved over 25 different named victims and more than 25 different credit card accounts. Mannan and his associates' criminal conduct has caused a reported loss to the financial institutions of over \$70,000. Capital One Bank reported the loss exposure (potential) as over \$500,000.

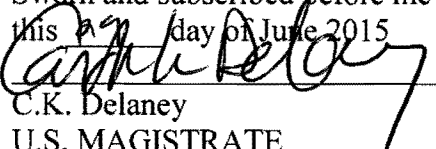
10. I am aware that premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize law enforcement efforts safely to apprehend the defendant. Also, premature disclosure may pose a risk to executing law enforcement. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this affidavit, the accompanying complaint, and arrest warrant.

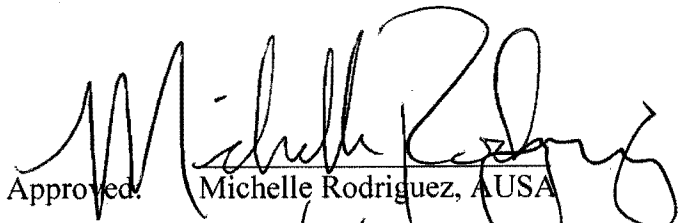
11. Accordingly, there is probable cause to believe that Abdul Mannan (DOB 11/9/1982) committed, and aided and abetted, numerous violations of federal criminal law, including

Count	Date	Violation	Description
1	11/2/14	18 USC 2, 1344(2)	Bank Fraud And Aiding And Abetting
2	11/5/14	18 USC 2, 1344(2)	Bank Fraud And Aiding And Abetting
3	11/5/14	18 USC 2, 1344(2)	Bank Fraud And Aiding And Abetting
4	11/7/14	18 USC 2, 1344(2)	Bank Fraud And Aiding And Abetting
5	11/2/14	18 USC 2, 1028A(a)(1)	Aggravated ID Theft, Aiding And Abetting
6	11/5/14	18 USC 2, 1028A(a)(1)	Aggravated ID Theft, Aiding And Abetting

Your affiant respectfully requests that the attached complaint and arrest warrant be issued.

  
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Ryan Vazquez, SA Dept of Homeland  
Security, Homeland Security Investigations

Sworn and subscribed before me  
this 29 day of June 2015  
  
C.K. Delaney  
U.S. MAGISTRATE

  
Approved: Michelle Rodriguez, AUSA  
6/29/15