

FILED

JAN 13 2016

UNITED STATES DISTRICT COURT

for the

Eastern District of California

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

In the Matter of the Search of)

UNDER SEALThe premises located at 9143 Newport West Way,
Elk Grove, California, 95758)Case No. **2:16-SW-00009** EFB 1**APPLICATION FOR A SEARCH WARRANT**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

SEE ATTACHMENT A, attached hereto and incorporated by reference.

located in the Eastern District of California, there is now concealed (*identify the person or describe the property to be seized*):

SEE ATTACHMENT B1, attached hereto and incorporated by reference

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

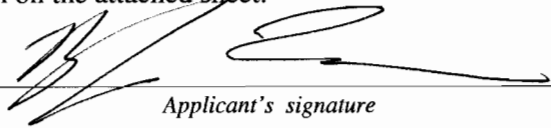
The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 USC §§ 1341, 1343, 1349; and ;	Mail Fraud; Wire Fraud; Conspiracy; and Encouraging and Inducing Illegal
USC §§ 1324(a)(1)(A)(iv) and (B)(i)	Immigration for Private Financial Gain

The application is based on these facts:

SEE AFFIDAVIT, attached hereto and incorporated by reference.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Brady H. Cowan, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date:

1-13-2016


Judge's signature

City and state: Sacramento, California

Edmund F. Brennan, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF SEARCH WARRANTS

I, Brady H. Cowan, being duly sworn, do hereby depose and state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI"), and have been so employed since September 2014. I was trained as an FBI Special Agent at the FBI Academy in Quantico, Virginia. I have received specialized training in the methodology of general law enforcement and white collar and fraud criminal investigations. I am currently assigned to a White Collar Squad of the Sacramento Division of the FBI. In my current assignment, I am responsible for investigating public corruption, civil rights violations, and fraud against the government in the Eastern District of California and elsewhere. I have participated in federal investigations involving election fraud, identity theft, wire fraud, fraud against the government, color of law violations, public corruption, and mail fraud. I have performed law enforcement related tasks such as executing state and federal search and arrest warrants, utilizing confidential sources, issuance of grand jury subpoenas, and surveillance of subjects. I have participated in the execution of search warrants that involved the search and seizure of financial instruments, computer equipment, and proceeds from a crime, including the execution of other search warrants in this investigation.

2. The facts and conclusions in this Affidavit are based on: (i) my personal knowledge gathered during my participation in this investigation; (ii) my training and experience; (iii) the training and experience of other law enforcement personnel with whom I have discussed this investigation, (iv) my review of information obtained by other law enforcement personnel participating in this investigation; (v) statements of witnesses and victims. Since this Affidavit is being submitted for the limited purpose of establishing probable cause to secure search warrants for the below-described locations, I have not set forth each and every detail I have learned during the course of this investigation. Nor do I request that this Court rely upon any facts not set forth herein in reviewing this Affidavit and considering the associated applications for search warrants.

II. CRIMINAL VIOLATIONS

3. The Sacramento Office of the FBI and Homeland Security Investigations ("HSI") are

1 investigating criminal offenses that began at a time unknown to the United States but at least as early as
2 in about January 2013, and that continue to the present. The criminal conduct involves, among other
3 criminal offenses, a conspiracy to defraud undocumented immigrants by charging them exorbitant fees
4 for false and fraudulent immigration advice and assistance with negotiating an elaborate adult-adoption-
5 to-citizenship scheme, which includes the use of false information in the adoption petitions and which
6 the perpetrators falsely promise will result in legal United States citizenship. As a result of the scheme,
7 the victim undocumented immigrants are also induced to remain in the United States illegally in reliance
8 on the false and fraudulent immigration advice and information provided by the perpetrators.

9 4. This Affidavit is submitted in support of applications for search warrants for the premises
10 described more particularly in Attachment A1 and the email account described more particularly in
11 Attachment A2, both of which are attached hereto and fully incorporated herein. The warrants are for
12 the items set forth in Attachment B1 and B2, respectively, both of which are attached hereto and fully
13 incorporated herein. The items set forth in Attachments B1 and B2 may constitute evidence, fruits,
14 contraband, and instrumentalities of violations of: (i) Title 18 United States Code, § 1341 (Mail Fraud);
15 (ii) Title 18 United States Code, § 1343 (Wire Fraud); (iii) Title 18 United States Code, § 1349
16 (Conspiracy); and (iv) Title 8 United States Code §§ 1324(a)(1)(A)(iv) and (B)(i) (Encouraging and
17 Inducing Illegal Immigration for Private Financial Gain) (collectively, the "Specified Federal
18 Offenses").

19 5. The search warrants sought are primarily for the seizure of documentary evidence,
20 including, concerning the warrant to search the premises described in Attachment A1 only, handwritten
21 or typewritten records and documents, as well as, concerning both warrants, computer generated
22 records. The warrant to search the premises described in Attachment A1 only is also for the purpose of
23 seizing any computer hardware and software and other electronic and non-electronic media as more
24 fully described in Attachment B1, which relate to activities in furtherance of the of the Specified Federal
25 Offenses. The scope of the warrant to search the premises described in Attachment 1 includes the
26 entirety of the below-described locations where the items listed in Attachment B1 might be found. The
27 scope of the warrant to search the email account described in Attachment A2 includes the entirety of the
28

1 account as limited in Attachment B2.

2 **III. JURISDICTION**

3
4 6. This Court has jurisdiction to issue the requested warrant because it is “a court of
5 competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) &
6 (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over
7 the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

8 **IV. LOCATIONS TO BE SEARCHED**

9 7. This Affidavit is submitted in support of an application for a search warrant for the
10 premises located at: 9143 Newport West Way, in Elk Grove, California, 95758 (the “**Subject**
11 **Premises**”), which is more particularly described in Attachment A1.

12 8. Specifically, the **Subject Premises** is a two story residence, located on the corner of
13 Newport West Way and Tegan Road in Elk Grove, California. The home is located east of Newport
14 West Way and north of Tegan Road. The structure is predominately beige in color. The numbers
15 “9143” are arranged vertically on the wall just south of the garage door and are also painted vertically in
16 black font on a white background on the sidewalk on the southwest corner of the driveway. The
17 **Subject Premises** is more particularly described in Attachment A1.

18 9. The scope of the search warrant should include all rooms, annexes, attics, basements,
19 mailboxes, trash containers, debris boxes, storage lockers and areas, cabinets, and other rooms
20 associated with the **Subject Premises**. The search should also extend into desks, cabinets, safes,
21 briefcases, purses, electronic storage devices, and other storage locations within the premises; to include
22 the search of any computers, computer-based storage media, and other electronic devices contained
23 within the premises and any other storage areas within the **Subject Premises**, in which items in
24 Attachment B1 may be found. Based on my experience, knowledge, and training, and that of other
25 agents with whom I have discussed this investigation, I am aware that suspects in similar wide-ranging
26 fraud schemes may possess storage safes, computers, facsimile machines, cell phones, pagers, and other
27 electronic devices and use them as part of their method of operation. I have found or talked with agents
28 who have found these types of items at such locations in past investigations.

10. I also request that the search include the persons of people who are found within and on the curtilages of the **Subject Premises**. Based on my experience, knowledge, and training and that of other agents with whom I have discussed this investigation, I am aware that records and data can be stored on very small digital storage media, such as thumb-drives and media cards. For example, a typical digital SD media storage card is smaller than .5 inches by .75 inches. Through my experience, training, and discussions with other law enforcement agents, I am familiar with similar investigations in which media cards, and the data and records contained on those media cards, were found in a suspect's purse, wallet, and clothing pockets.

11. This Affidavit is also submitted in support of an application for a search warrant for information associated with a certain email account, "jeffseviercell@gmail.com", that is stored at premises controlled by Google, Inc. an email provider headquartered at 1600 Amphitheatre Parkway, in Mountain View, California, 94043 (the "**Subject Email Account**"). The information to be searched is described more particularly in Attachment B2. This Affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Google, Inc. to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B2. Upon receipt of the information described in Section I of Attachment B2, government-authorized persons will review that information to locate the items described in Section II of Attachment B2.

12. Based on the facts set forth in this Affidavit, I believe that probable cause exists to conclude that evidence, fruits, contraband, and instrumentalities, including documents, records, and other items set forth more particularly in Attachments B1 and B2, will be found at the **Subject Premises** and the **Subject Email Account** and that such evidence, fruits, contraband, and instrumentalities will tend to establish violations of the Specified Federal Offenses.

V. FACTS ESTABLISHING PROBABLE CAUSE

A. Initial Complaint to Homeland Security Investigations

13. In or about February 2015, HSI agents received information from the Fraud Detection National Security ("FDNS") unit of U.S. Citizenship and Immigration Services ("USCIS") in

1 Sacramento concerning applications for naturalization that were sponsored by Dr. Helaman Hansen
2 (“HANSEN”). HANSEN was, at the time, the Chief Executive Officer (“CEO”) of Americans Helping
3 America Chamber of Commerce (“AHA”), which purports to provide assistance in finding adoption for
4 adult undocumented immigrants by United States citizens. The complaint alleged that after the adoption
5 is completed, the adoptee is instructed to apply for a provisional birth certificate in a new name.
6 According to the complaint, this conditional birth certificate is then used to apply for a tax identification
7 number, a new driver’s license, and other documents in the adoptee’s new name. Later this
8 documentation is used by the adoptee to apply for United States citizenship with the assistance of AHA.

9
10 **B. Initial Complaint to the FBI**

11 14. In or about February 2015, an employee of AHA (“Employee 1”) called the FBI to report
12 a scheme by the company and its subsidiaries, Native Hawaiians and Pacific Islanders (“NHPI”) and
13 Community Independent Business Owners (“CIBO”), to defraud undocumented immigrants of money
14 under false promises of an alternate path to citizenship through an adult adoption process. Employee 1
15 first became aware of the scheme when a victim of the AHA adult-adoption-to-citizenship scheme
16 entered AHA’s office to complain that she could not afford to pay her \$1,500 annual fee for
17 participation in the program. Employee 1 discovered that the woman had paid an initial fee of \$4,500 to
18 become adopted by another adult under the pretense that the adult adoption would eventually lead to
19 United States citizenship. Thereafter, Employee 1 also discovered that another AHA employee, M.H.,
20 had an uncle participating in the AHA adult-adoption-to-citizenship scheme. Together, Employee 1 and
21 M.H. began investigating AHA’s involvement in the scheme and discovered a file room in the AHA
22 offices that contained files associated with people participating in the adult-adoption-to-citizenship
23 scheme. Employee 1 stated that s/he believed no one had ever successfully completed the adult-
24 adoption-to-citizenship process as promised by AHA, yet AHA continued to accept money from
25 customers seeking that service.

26 **C. Relevant Entities and Individuals Associated with the AHA Fraud Scheme**

27 15. AHA purports to be registered with the state of California and federally as a nonprofit
28 entity with federal 501(c)6 tax exempt status. AHA’s primary business activity is the marketing, sale,

1 and maintenance of "memberships" to victims of its adult-adoption-to-citizenship scheme.

2 16. NHPI purports to be subsidiary of AHA and also registered with the state of California
3 and federally as a nonprofit entity with federal 501(c)6 tax exempt status. NHPI is primarily involved in
4 the marketing, sale, and maintenance of "memberships" to purchasers of its adult-adoption-to-
5 citizenship scheme. NHPI targets the foreign Pacific Islander immigrant community.

6 17. CIBO purports to be subsidiary of AHA and an import/export company focused on trade
7 between the United States and the South Pacific. However, CIBO's former CEO, Newalow Weekes
8 ("WEEKES"), is heavily involved in the marketing, sale, and maintenance of "memberships" to
9 purchasers of the AHA or NHPI adult-adoption-to-citizenship schemes. WEEKES was recently
10 promoted to a new position within AHA and also holds the alternate title of Director of Agent Services
11 for AHA.

12 18. Fijians Helping Fiji ("FHF") purports to be a subsidiary of AHA and is primarily
13 involved in the marketing, sale, and maintenance of "memberships" to purchasers of its adult-adoption-
14 to-citizenship scheme (or that of AHA or NHPI). FHF also purports to maintain offices in Fiji. It is
15 unclear whether FHF currently maintains offices in the United States.

16 19. HANSEN is the Chairman of the Board of Directors and founder of AHA, NHPI, and
17 CIBO. HANSEN is involved in all aspects of the adult-adoption-to-citizenship schemes employed by
18 AHA and its purported subsidiaries. HANSEN claims to hold a doctorate degree in Marketing and
19 Business and refers to himself as "Dr. Hansen."

20 20. Viola Hansen ("VIOLA") is the President of NHPI and HANSEN's spouse. VIOLA is
21 involved with collecting and completing paperwork associated with adult adoptions in the adult-
22 adoption-to-citizenship scheme employed by AHA and its purported subsidiaries. VIOLA was
23 personally present during many AHA/NHPI-sponsored adult adoption legal proceedings completed in
24 Alameda County, California, in 2015.¹

25 ¹ Based discussions with other agents and USCIS officials, I am aware that in 1999 VIOLA
26 obtained a DV2 (Diversity) visa, which permitted VIOLA to immigrate to, and permanently reside and
27 work in, the United States as a legal permanent resident ("LPR"). VIOLA later filed an N400
28 Application for Naturalization, available only to LPR status holders, which was approved in or about
2006, resulting in VIOLA becoming a naturalized citizen. In or about 2003, VIOLA was adopted by a
California resident. That adoption had no impact on VIOLA's eligibility for United States citizenship.

1 21. Jeffrey Sevier ("**SEVIER**") was the CEO of AHA. In or about November 2015,
2 **SEVIER** posted a message on his personal (and public) Facebook page claiming that he was no longer
3 associated with AHA. While at AHA, **SEVIER** primarily targeted the Hispanic community with the
4 adult-adoption-to-citizenship fraud scheme through word-of-mouth advertisement and by soliciting
5 members of Sacramento churches. **SEVIER** has personally adopted multiple non-citizen adults and has
6 paid his sister to adopt others. In or about March 2014, while still working for AHA, **SEVIER** founded
7 an independent organization called Americans Helping America Sacramento Agency ("**AHASA**"),
8 which, according to California Secretary of State records, remained active as recently as December 29,
9 2015. **SEVIER** resides at the **Subject Premises** with his spouse, and he is the holder of the **Subject**
10 **Email Account**.

11 22. WEEKES was recently promoted from the position of AHA Chairman for the South
12 Pacific. WEEKES has been involved in the adult-adoption-to-citizenship fraud scheme since at least
13 March 2015. WEEKES has also recruited agents whom WEEKES tasks with soliciting new
14 customers/victims of the AHA/NHPI adult-adoption-to-citizenship scheme in exchange for commission
15 payments from WEEKES or, sometimes, to WEEKES.

16 23. Garrison Weekes ("**GARRISON**") is WEEKES' son and former assistant. Among other
17 tasks, **GARRISON** assists WEEKES in communicating with other AHA recruiting agents who work for
18 WEEKES, and in collecting money from AHA/NHPI adult-adoption-to-citizenship victims.

19 24. Anthony Anderson ("**ANDERSON**") is WEEKES' former assistant and was recently
20 promoted to CEO of CIBO. Among other tasks, **ANDERSON** assists WEEKES in communicating with
21 other AHA recruiting agents who work for WEEKES, and in collecting money from AHA adult-
22 adoption-to-citizenship victims.

23 25. Jonathan Fala ("**FALA**") is the CEO of NHPI.

24 26. Wesley Kikau ("**KIKAU**") is the CEO of FHF.

25 27. Peter Dunning ("**DUNNING**") is the Director of Migration Services for AHA.
26 **DUNNING** was first identified by law enforcement agents on November 14, 2015, after AHA released a
27 series of YouTube videos featuring conversation between **HANSEN** and **DUNNING**, which promote the
28

1 AHA adult-adoption-to-citizenship fraud scheme.

2 28. CS-1 is a confidential source involved in the investigation described in this Affidavit.
3 CS-1 was once an employee of AHA. Since leaving AHA, CS-1 has maintained personal relationships
4 with AHA employees throughout the investigation.

5 29. The activities of AHA, NHPI, and CIBO (and other AHA-related entities) overlap
6 substantially. As set forth more fully below, based on information obtained from public statements of
7 HANSEN, SEVIER, and WEEKES – including from YouTube recordings posted by AHA or its
8 subsidiaries or by individuals associated with AHA – as well as information from former AHA
9 employees, victims of the AHA/NHPI adult-adoption-to-citizenship scheme, and from other sources
10 discussed herein, it is clear that AHA and its subsidiaries are engaged in substantially the same activity.
11 The only identified distinctions among the efforts in furtherance of the AHA/NHPI adult-adoption-to-
12 citizenship scheme undertaken by those associated with AHA, NHPI, CIBO, or other AHA subsidiaries
13 appears to be the title of the entity offering the services. Efforts in furtherance of the adult-adoption-to-
14 citizenship scheme are undertaken by the same central actors and support staff, and are primarily
15 managed and maintained from shared physical space. In sum, HANSEN and his co-conspirators have
16 created the appearance of a complex association of distinct corporate entities to mask the operation of a
17 common scheme by a common group, using common resources from shared physical space.

18 **D. Interview of Former NHPI Employee M.H.**

19 30. On or about March 6, 2015, I interviewed M.H., a former NHPI employee. M.H. was
20 hired for a data entry position at NHPI and also held positions as a social media coordinator, brochure
21 editor, and was eventually promoted to HANSEN's personal assistant.

22 31. M.H.'s uncle was a victim of AHA's adult-adoption-to-citizenship scheme. M.H. stated
23 that her uncle hoped to gain citizenship by being adopted by a United States citizen and agreed to
24 participate in the process as offered to him by agents of NHPI. M.H.'s uncle received a new birth
25 certificate but never obtained United States citizenship. M.H. stated that she was aware from her review
26 of AHA "customer" files that more than 100 other people had received new birth certificates through
27 AHA adult adoptions, but never obtained United States citizenship. M.H. told law enforcement agents
28















1 that HANSEN told M.H. the undocumented immigrants were to blame for their failure to obtain United
 2 States citizenship and that HANSEN would not provide details about the process. M.H. stated that she
 3 asked HANSEN if any person had successfully completed the adult-adoption-to-citizenship process.
 4 HANSEN told M.H. he was not allowed to disclose that information because of laws protecting personal
 5 privacy. HANSEN also told M.H. that others who had successful completed the adult-adoption-to-
 6 citizenship program would not give testimonials because they were embarrassed about previously living
 7 in the United States illegally.

8 32. M.H. stated that NHPI initially charged adult adoption applicants \$150 annually, then
 9 increased the price to \$450, then \$600, and then charged \$5,000. NHPI had agents in Hawaii, San
 10 Francisco, and Salt Lake City. The NHPI agents were required to obtain applicants' information,
 11 process their paperwork, and ensure their membership fees were paid prior to processing that paperwork.

12 33. M.H. provided multiple documents distributed by AHA and its subsidiaries, including a
 13 list of agents in locations across the nation who take money from undocumented immigrants, which
 14 appears below:

Americans Helping America Page 33

AHA - AGENCIES NATIONWIDE:

	David Salakietu HAWAII		Valola B. Hamsem / SAC
	Richard Smith CA		Sueesi Masfu / BAY AREA
	Salmons Tupou NV		Nahid Kebani / ARABIC
	Hebert Ffita TONGA		Julie Leo / HAWAII
	Kado Cajetan FIJI		Katalina Katon / OREGON
	Waies Rairawa FIJI		Vai Malua / WA
	Yee Vang CA		Tommy Xiong / WISCONSIN

E. Interview of Former CIBO and NHPI Employee M.C.

34. On or about March 9, 2015, I interviewed M.C., a former employee of CIBO and NHPI. M.C. was hired initially to work on a website for CIBO because she holds a degree in information technologies ("IT"). HANSEN wanted to create an export company for Pacific Islanders and wanted to create a website as robust as Amazon.com. The original IT employee could not complete this task and eventually HANSEN gave up on the idea.

35. After the export website project failed, HANSEN offered M.C. a position as CEO of NHPI. M.C. thought she was under-qualified for a management position but reluctantly accepted due to a need for employment. M.C. stated that the main purpose of NHPI was to provide "adult adoption services" to undocumented immigrants. M.C. immediately saw logistical problems with the process, including the ratio of adult adoption agents to administrative personnel. M.C. stated that there were twenty agents who recruited candidates to begin the adoption process and only one secretary to process all of the applications. M.C. asked HANSEN about the success rate of the adult-adoption-to-citizenship program so that she could post testimonials on the website to recruit more candidates for the program. HANSEN told M.C. that they were behind in processing paperwork and blamed his secretary. HANSEN also said that none of the people who were successful in the program would want to provide a testimonial because of embarrassment that they were not citizens prior to completing the program.

36. HANSEN told M.C. that to become a United States citizen, an applicant must prove to the federal government that s/he held assets worth at least \$500,000. M.C. stated that HANSEN claimed to have given shares of the company to applicants to fulfill this need, but M.C. believed that none of the stocks were worth \$500,000. HANSEN had laborers working in his office who were not United States citizens to "earn the stocks." One of these workers had been adopted by someone already, but was told citizenship could not be finalized without proof of the required assets. Some of these workers also received stipends from NHPI.

37. M.C. stated that while she worked for the company, NHPI charged adult adoption applicants a \$1,500 annual fee to keep their applications open. The price for the adult adoption process went up to around \$5,000 after M.C. left the company.

38. M.C. stated that SEVIER was the vice-president of AHA when M.C. worked for the

1 company. SEVIER told M.C. it was ultimately the undocumented immigrants' responsibility to
2 complete the adult adoption process. M.C. stated that she believed that if someone filed adult adoption
3 paperwork without assistance from NHPI, it would cost \$200 in court fees.

4 39. M.C. stated that HANSEN told AHA and NHPI employees that HANSEN met President
5 George W. Bush in 2006, and that he met a United States Supreme Court Justice who "wrote a law" that
6 allowed HANSEN to begin the adult-adoption-to-citizenship program. After M.C. became suspicious
7 about the immigration program, she tried to move to the NHPI media department. M.C. also asked a lot
8 of questions about the adult-adoption-to-citizenship program and SEVIER told her that all NHPI was
9 doing was filling out adoption forms. M.C. told SEVIER that filling out adoption forms was not what
10 people were paying for. M.C. was later fired.

11 **F. Interview of Former AHA Employee C.L.**

12 40. On or about August 14, 2015, I interviewed C.L., who previously worked in the AHA IT
13 department and left AHA in approximately April 2015. While employed by AHA, C.L. reported
14 directly to SEVIER, the CEO of AHA. SEVIER often told C.L. to find pirated versions of software for
15 the company. C.L. stated that he believed that SEVIER downloaded pirated software for AHA using
16 Torrent file sharing.

17 41. C.L. stated that many employees working at AHA were current victims of AHA's adult-
18 adoption-to-citizenship fraud scheme; that SEVIER would use the pending immigration status of those
19 employees to intimidate them to work harder; and that at least a dozen people per week came into AHA
20 looking for immigration help.

21 **G. Interview of Former AHA Employee A.S.**

22 42. On or about August 19, 2015, I interviewed A.S., who also previously worked in the IT
23 department at AHA, and who left AHA in approximately December 2014.

24 43. A.S. stated that the majority of AHA's electronic data was contained on two shared
25 drives. She also identified a payroll computer with additional files that might not be stored on the
26 shared drives. A.S. identified a paper file room in the AHA building, to which only SEVIER and
27 HANSEN had keys.
28

1 44. A.S. stated that HANSEN and SEVIER told her and other employees that AHA had
2 received numerous grants and would be working closely with Homeland Security and "INS." A.S. also
3 stated that HANSEN and SEVIER told her that that the FBI would come to inspect the AHA data
4 networks to ensure they were secure enough to work with Homeland Security. A.S. stated that AHA
5 paid multiple people under the table. When AHA employees were first hired, they were given the
6 option to be paid in cash or legitimately with W2 forms. A.S. stated that AHA rotated through multiple
7 lawyers, who left because they thought the company was not conducting legitimate business.

8 45. A.S. stated that AHA conducted adult adoptions as a way for people to become United
9 States citizens. A.S. also stated at an employee meeting HANSEN and SEVIER stated that they knew
10 how to "get citizenship done." They did not share many details of the adult-adoption-to-citizenship
11 program with AHA employees because they said it was complicated and only they understood it. A.S.
12 recalled that most of the people who were involved in AHA's adult-adoption-to-citizenship scheme
13 came to the building at night. A.S. stated that a woman friend of hers, who paid to participate in the
14 program but who never became a citizen, threatened to sue HANSEN and the company but never did.

15 46. A.S. stated that when she began working for AHA, all of its Microsoft products were
16 downloaded illegally by SEVIER from something called "Pirate Bay." A.S. stated that she and C.L.
17 worked to install legitimate versions of software while they worked at AHA.

18 **H. Interview of Former AHA Employee L.K.**

19 47. On or about December 15, 2015, SA Squire and I interviewed L.K., who worked as an
20 administrative assistant for AHA from approximately April 2015, to September 2015. L.K. stated that
21 her role was to type up "pleadings" or petitions for adult adoptions to be filed with different courts.
22 L.K. was fired from AHA after she refused HANSEN's direction to falsify an address on an adult
23 adoption petition. Specifically, HANSEN instructed L.K. to falsely list a Sacramento County address on
24 an adult adoption petition to be filed in Sacramento County, when L.K. knew the petitioner was a
25 resident of Alameda County. L.K. stated that AHA was unable to file adult adoption petitions in
26 Alameda County after the Alameda County District Attorney's Office discovered AHA was submitting
27 false addresses on their adult adoption petitions in that county.
28

1 48. L.K. stated that when she started with AHA, AHA charged undocumented immigrants
2 \$7,000 to participate in the adult-adoption-to-citizenship scheme, but by approximately September 2015,
3 AHA had raised the price to \$10,000. L.K. stated that when she first started working at AHA, all the
4 adult adoption petitions were sent to Alameda County, but they were later sent all over California,
5 including to Marin County, Los Angeles County, Santa Clara, and one to two instances in Riverside
6 County. L.K. also stated that she remembered AHA having clients as far away as New York.

7 49. L.K. stated that V.T. was her boss while she worked at AHA and he processed most of
8 the adult adoption paperwork. L.K. stated that the majority of the adult adoption petitions filed by AHA
9 were sent through the mail, but in some counties, such as Sacramento County, petitions were filed in
10 person. According to L.K., sometimes AHA mailed the petitions to their undocumented immigrant
11 customers for their signatures before filing. L.K. stated that at one point WEEKES asked L.K. to help
12 him make a contract between the adoptees and AHA. The contract outlined what services the adoptees
13 would receive for their money.

14 50. According to L.K., ANDERSON and GARRISON were adult adoption agents who
15 processed adult adoption paperwork and helped the adoptees through the adult-adoption-to-citizenship
16 program.

17 51. L.K. stated that all of the money from victims for the adult adoptions went through
18 HANSEN and that the initial applications for the adoptee to AHA were screened by HANSEN. L.K.
19 stated that HANSEN also stamped each packet as "paid" once the adoptee paid the fee. L.K. also stated
20 that HANSEN was unable to give an example of anyone who had successfully become a United States
21 citizen through his adult adoption program. L.K. heard HANSEN tell people, including V.T., that adult
22 adoption results in citizenship as part of a twenty-four month program.

23 52. According to L.K., V.T. had adult adoption files in his AHA office, including physical
24 and digital copies. L.K. stated that digital copies were kept on the shared drive at the primary AHA
25 office. When L.K. left AHA in approximately September 2015, there were 350 victims in the AHA
26 database who were participating in the adult-adoption-to-citizenship scheme.

27 53. L.K. stated that she witnessed one adult adoption agent come into the primary AHA
28

1 office with \$14,000 in cash for two adoptions when adoptions were \$7,000 each. L.K. said that adult
2 adoption agents at AHA received \$1,500 commission per adoption.

3 54. L.K. stated that while she worked at the company, **SEVIER** was the CEO of AHA,
4 **WEEKES** was the CEO of CIBO, and **HANSEN** "ran everything." L.K. stated that **HANSEN**,
5 **SEVIER**, and **WEEKES** "know everything" in regards to the adult-adoption-to-citizenship scheme.

6 55. Before she was interviewed by law enforcement agents, L.K. reached out to investigators
7 in writing. On or about September 30, 2015, L.K. wrote a letter to USCIS to report AHA for fraud (the
8 "September Letter"). In the September Letter, L.K. stated the same facts she repeated in her December
9 15, 2015 interview, in addition to others. L.K. wrote that AHA offers adult adoption services, which are
10 intended to circumvent the immigration process under the false promise that the adoptee will become a
11 citizen in twenty-four months, and that undocumented workers would pay up to \$10,000 to AHA as a
12 fee to participate in the program.

13 56. In the September Letter, L.K. wrote that she was in charge of preparing the legal
14 documents for adoption petitions to the courts, and that she was fired when she refused to include false
15 addresses on some of those petitions. L.K. wrote that AHA's inclusion of false information on adoption
16 petitions was a "regular business practice, not a mistake, not an oversight." L.K. also provided
17 supporting documentation with her letter, including intake forms for adult adoption applicants and the
18 adoption petitions actually filed with the courts.

19 57. In the September Letter, L.K. wrote that AHA recruiting agents find individuals who are
20 interested in the adult adoption program, receive a commission of \$1,500 per client, and can adopt
21 undocumented immigrants themselves if they wish. L.K. wrote that **SEVIER** embraced AHA's
22 fraudulent practices with "no conscience," and had instructed L.K. to include false information on court
23 documents. L.K. wrote that although she believed the courts only permit a person to adopt one unrelated
24 individual per year, to circumvent this rule, **SEVIER** adopted Hispanic clients and claimed that they
25 were related to his wife, who is Hispanic. L.K. wrote that, between April 30, 2015, and August 24,
26 2015, **SEVIER** adopted or submitted documents to adopt seventeen individuals, earning \$24,000. L.K.
27 also provided a seven-page spreadsheet with names of AHA customers adopted by **SEVIER**. Below is
28

a sample:

Date File Received	Client's Old Name	Client's New Name	Adoptor's Name	Funds Received	Amount Paid to Agent
4/30/2015			Jeffrey Alan Sevier	\$ 5,000.00	\$ 1,500.00
5/2/2015				\$ 5,000.00	\$ 1,500.00
5/4/2015			Jeffrey Alan Sevier	\$ 3,500.00	\$ 750.00
5/5/2015				\$ 5,000.00	\$ 1,500.00
5/9/2015			Jeffrey Alan Sevier	\$ 6,000.00	\$ 1,500.00
5/11/2015			Jeffrey Alan Sevier	\$ 5,000.00	\$ 1,500.00
5/11/2015				\$ 5,000.00	\$ 1,500.00
5/18/2015				\$ 6,000.00	\$ 1,500.00

58. L.K. concluded the September Letter by writing that AHA preys on undocumented immigrants knowing that they are desperate to stay in the United States. L.K. wrote that AHA representatives use this knowledge for their own financial gain by lying, misleading, and failing to disclose all necessary information to these immigrants. L.K. wrote that the adult adoption process is being explained to these people by individuals who have no legal training.

I. Interview of Victim C.M.

59. On or about August 6, 2015, I interviewed C.M., who is related to a victim of the AHA adult-adoption-to-citizenship scheme. C.M. stated that SEVIER was a former co-worker of C.M.'s at a business unrelated to AHA called "Health For All." When SEVIER began employment with Health For All, SEVIER was already working part-time at AHA and NHPI. While employed by AHA and NHPI SEVIER worked at the primary AHA office. SEVIER's wife, A.V.S., also worked for Health For All, as a bus driver.

60. When SEVIER met C.M., SEVIER explained the adult adoption process to her. In or

1 about December 2014, C.M.'s undocumented immigrant friend expressed concern that she was afraid of
2 losing her job after her boss had asked her for a green card. **SEVIER** told C.M. that **HANSEN** had a
3 company that assisted in the adult adoption process. **SEVIER** sent C.M. YouTube videos to watch and
4 showed C.M. a birth certificate of someone who had recently been adopted as proof of the legitimacy of
5 the process. C.M. told her friend about the adult adoption process and took the friend to meet **SEVIER**,
6 but the friend decided against participating.

7 61. C.M. later offered to put her relative in the San Diego area in touch with **SEVIER**
8 because the relative was an undocumented immigrant. The relative agreed and in or about May 2014,
9 **SEVIER** asked for a check or money order for \$2,500 made out to "NHPI," which was the fee for the
10 adult adoption process. C.M.'s relative paid the fee. On or about June 7, 2014, **SEVIER**'s sister
11 adopted C.M.'s relative after legal proceedings in the Sacramento County Court.

12 62. Approximately two or three months after the adoption, C.M.'s relative received a birth
13 certificate in the mail with a new name. **SEVIER** told C.M. that the relative would receive a new social
14 security number in an additional two months. **SEVIER** explained that once C.M.'s relative had her
15 birth certificate and social security number, she would then need to go to the Department of Motor
16 Vehicles to obtain a new driver's license. Once C.M.'s relative had a new driver's license, AHA/NHPI
17 would submit a packet to "INS." **SEVIER** told C.M. and her relative that AHA/NHPI needed pictures
18 of C.M.'s relative going to school and participating in community service, and needed things like car
19 insurance in the relative's new name because those things would also be included in the packet delivered
20 to INS. **SEVIER** claimed that after INS reviewed this packet, the relative would become a United
21 States citizen and receive a passport. C.M.'s relative never received anything after the birth certificate.
22 **SEVIER** later informed C.M. that applicants will receive tax identification numbers instead of social
23 security numbers.

24 63. **SEVIER** asked C.M. to be an agent for AHA/NHPI. He told C.M. she would need to
25 "become a member" by paying \$1,000 annually and then she would receive a commission for each
26 person she recruited for the adult adoption process. C.M. declined and told **SEVIER** that she was not
27 interested in recommending the process to anyone else until her relative became a United States citizen.
28

1 64. C.M. called **SEVIER** one month prior to C.M.'s interview with law enforcement agents
2 to check on the status of her relative's citizenship process. **SEVIER** said the process was taking time
3 and told C.M. to make an appointment with his secretary if she wished to discuss it further. He also said
4 AHA/NHPI was now charging \$7,500 per adult adoption.

5 65. **SEVIER**'s sister was living with C.M. at the time of her interview with law enforcement
6 agents. **SEVIER** had recently asked his sister to adopt two more adults. **SEVIER**'s sister adopted one
7 in Oakland, California, in Alameda County, and the second adoption was pending at the time of C.M.'s
8 interview with law enforcement agents. **SEVIER** visited C.M.'s house to talk to his sister about the
9 AHA/NHPI adoptions and said he was conducting ten adoptions every week.

10 66. C.M. stated that **SEVIER** told her that he had a brother in Minnesota who intended to
11 open an AHA/NHPI office and he asked C.M.'s relative to open a branch in San Diego, California.

12 67. C.M. stated that A.V.S. confided in C.M. that A.V.S. knew what **SEVIER** was doing
13 related to the adult adoption program was morally wrong and that A.V.S. had tried to get **SEVIER** to
14 stop. **SEVIER** became angry when A.V.S. confronted him.

15 68. On or about December 14, 2015, I called C.M. to ask her about a YouTube video I
16 discovered that featured C.M. promoting the AHA adult adoption program in the Spanish language.
17 C.M. stated that **SEVIER** asked C.M. to appear in a YouTube video promoting the AHA adult-
18 adoption-to-citizenship program in Spanish in approximately January 2014. C.M. stated that at the time,
19 she thought the program was a legitimate path to United States citizenship. At the time, C.M. was aware
20 of AHA videos that already existed in English and thought they were legitimate. C.M. stated that
21 **SEVIER** told C.M. what to say and she agreed to appear in a video, which was posted to the internet
22 shortly after it was filmed.

23 **J. Interview of Victims O.G. and M.G.**

24 69. On or about April 29, 2015, HSI Special Agent Craig Squire ("SA Squire") and USCIS
25 Officer Jason Ohnemus ("Officer Ohnemus") interviewed O.G. and his wife, [M.G.], regarding their
26 experience as victims of AHA's adult-adoption-to-citizenship scheme. In or about April 2014, AHA
27 assisted O.G. and M.G. in the process of adopting O.G.'s sister, M.L.G., and O.G.'s cousin, E.G.G.,
28

1 O.G. stated that his wife's co-workers told her about AHA and put her in touch with **SEVIER**. O.G.
2 and his wife completed the adoption approximately one year prior to their interview with SA Squire and
3 Officer Ohnemus but had received no immigration documents resulting from the adoptions. O.G. stated
4 that they keep facing delays and an AHA representative told them they needed more paperwork.

5 70. O.G. and his wife paid the adoption fees for M.L.G. and E.G.G. **SEVIER** attended the
6 adoption proceedings. A friend of O.G.'s wife obtained a new birth certificate after an adult adoption
7 facilitated by AHA.

8 71. M.G. stated that **SEVIER** told her she could adopt multiple people. **SEVIER** told her
9 that the adoptees would get a social security card and that the adoptees would become United States
10 citizens, like her.

11 72. M.G. and her husband paid \$8,000 to AHA, by cashier's check, for the adoption of
12 M.L.G. and E.G.G. They also paid \$50 in court fees for each adoption and paid a fee to Vital Records.
13 M.G. stated that she had been calling **SEVIER** to find out when birth certificates for E.G.G. and M.L.G.
14 would be ready. In their last conversation, **SEVIER** told M.G. he said he was going to court in
15 Oakland.

16 73. M.G. stated that an AHA representative offered her and her husband the opportunity to
17 purchase insurance and to invest in AHA. The AHA representative told them that investing in AHA was
18 good opportunity because the business is expanding.

19 **K. Interview of Victim M.F.**

20 74. On or about May 15, 2015, SA Squire, Officer Ohnemus, and USCIS Officer Nai Saelee
21 ("Officer Saelee") interviewed M.F. regarding how M.F. and her husband were victims of AHA's adult-
22 adoption-to-citizenship scheme. M.F. stated that she and her husband used AHA to adopt V.M. and
23 L.M.

24 75. M.F. stated that she and her husband attend the Iglesia Bautista de Sacramento church.
25 M.F. stated that **SEVIER** visited the church to tell the congregation about AHA's adult-adoption-to-
26 citizenship program. **SEVIER** stated the program was for people with immigration issues and that it
27 was designed to keep families together. **SEVIER** said the program was for people of good conduct and
28

1 good morals.

2 76. M.F. stated that V.M. is an undocumented immigrant who rents a room from M.F. and
3 her husband and runs his own landscaping business. SEVIER spoke to M.F.'s husband about the
4 adoption process. Later, M.F. and her husband paid \$4,000 to AHA to adopt V.M.

5 77. M.F. stated that L.M. is an undocumented immigrant who also attends the Iglesia
6 Bautista de Sacramento. M.F. and her husband agreed to adopt L.M. to help her with her immigration
7 status. L.M. paid for her own adoption.

8 **L. Interview of Victim B.E.**

9 78. On or about May 15, 2015, SA Squire, Officer Ohnemus, and Officer Saelee interviewed
10 B.E., regarding her experience with AHA's adult-adoption-to-citizenship scheme. B.E. stated that AHA
11 helped her to adopt M.R.

12 79. B.E. stated that she adopted M.R., who is from Fiji and has been B.E.'s caregiver since
13 2008. M.R. possessed a Green Card and was able to work legally in the United States but M.R.'s Green
14 Card expired. B.E. adopted M.R. to prevent M.R. from being deported.² B.E. stated she also wanted to
15 get M.R. a United States passport so they could visit Fiji together and M.R. would be able to legally re-
16 enter the United States.

17 80. B.E. learned about NHPI from someone M.R. knew and B.E. attended an AHA/NHPI
18 meeting, where she learned about the adult-adoption-to-citizenship program. B.E. stated that
19 AHA/NHPI representatives guaranteed that M.R. would become a United States citizen after the adult-
20 adoption-to-citizenship process was completed and AHA/NHPI representatives handled all of the
21 required paperwork.

22 81. M.R. told B.E. that M.R. was able to get a California birth certificate as part of the adult-
23 adoption-to-citizenship program. B.E. went with M.R. to Alameda County Court proceedings to
24 complete the adoption. SEVIER was present during the adoption legal proceedings at the courthouse in
25

26
27 ² I am aware based on my investigation in this matter and my discussions with other law
28 enforcement agents, including agents who have conferred with USCIS officials, that an expired Green
Card does not result in destruction of legal permanent resident status and can be renewed in the absence
of disqualifying conduct resulting in official suspension or revocation of status.

1 Alameda County.

2 82. In or about March 2015, B.E. wrote AHA/NHPI a \$4,500 check for its services in the
3 adult-adoption-to-citizenship program. B.E. was told that the money was for a membership in
4 AHA/NHPI. SEVIER gave B.E. a receipt for the payment.

5 83. B.E. stated that M.R. is waiting to get a social security card and was told by an
6 AHA/NHPI representative that it can take over a year to get a social security card, passport, and
7 identification card. B.E. stated that M.R. believed that once M.R. received all of her paperwork, M.R.
8 would become a United States citizen.

9 **M. Interview of Victim M.R.**

10 84. On May 15, 2015, SA Squire, Officer Ohnemus, and Officer Saelee interviewed M.R.,
11 regarding her experience with AHA's adult-adoption-to-citizenship scheme. M.R. stated that B.E. used
12 AHA to adopt M.R.

13 85. M.R. stated that she has been B.E.'s caretaker since 2008, when B.E. suffered a stroke.
14 In 2012, M.R. moved to Sacramento from Alameda, California, to take a job. B.E. moved to
15 Sacramento with M.R. Their relationship is now more like roommates; B.E. pays half of the rent and
16 half of the household bills. M.R. has not been paid by B.E. since 2012.

17 86. M.R. was introduced to AHA/NHPI by a girlfriend of hers, who had already gone
18 through the adult adoption process. M.R. was told that the organization takes care of all of the
19 paperwork and all she had to do was go to court.

20 87. M.R. stated that at her first meeting with AHA representatives, she and B.E. spoke to
21 HANSEN about the adult-adoption-to-citizenship program. M.R. expected to become a United States
22 citizen after the process was completed, but was told that the process took a long time. HANSEN gave
23 M.R. a list of items that she needs in order to become a United States citizen.

24 88. M.R. stated that the people who attended the AHA/NHPI meetings were mostly Fijians
25 and Tongans, although there were also some Hispanic people. At the meetings they are told about
26 needing insurance and how to start a business. They are told if they cannot afford to start a business,
27 they should pool their money with others to start one. One of the investment opportunities offered was
28

1 to invest in AHA. They were also encouraged to pool their money and buy real estate.

2 89. M.R. stated that five of her friends invested \$200 each in an investment with NHPI.
3 When M.R. questioned one of the friends about what the money was for or what the group was gaining,
4 the friend became evasive. M.R. knows that the group members receive letters from NHPI about their
5 investment.

6 90. M.R. stated that once she completes all the steps of the process with AHA/NHPI,
7 HANSEN will file her citizenship application with immigration officials.

8 91. VIOLA and HANSEN were at M.R.'s adoption hearing at the Alameda County Court.
9 M.R. thought that there were ten other groups in court that day completing adult adoptions facilitated by
10 AHA. B.E. paid a fee of \$50 to the court that day.

11 92. M.R. was told at an AHA office that all adoptions go through the court in Alameda
12 County and that it was easier to get the applications approved in Alameda County as opposed to other
13 counties.

14 93. M.R. has had doubts about AHA/NHPI. She thought about independently investigating
15 the process of becoming a United States citizen. She also thought about making the call to see if the
16 AHA/NHPI adult-adoption-to-citizenship program is legal but has not done so.

17 N. Interview of Victim I.T.

18 94. On or about November 25, 2015, SA Squire and I interviewed I.T. I.T.'s girlfriend was a
19 victim of the AHA adult-adoption-to-citizenship scheme. I.T. stated his girlfriend paid \$4,000 to be
20 adopted by a friend.

21 95. I.T. stated that he became suspicious that the AHA's adult adoption program was a scam.
22 I.T. stated that he called "Immigration" and was told that the adult adoption process for obtaining
23 citizenship was not in their system and that in the United States only minors could receive their
24 citizenship through adoption. I.T. stated that on or about November 20, 2015, he called AHA, planning
25 to confront an AHA representative, and spoke to DUNNING, the Director of Migration Services. I.T.
26 stated that he asked DUNNING how much it would cost to participate in the adult adoption program.
27 DUNNING told him it costs \$10,000. I.T. stated that he asked if he could pay \$4,000 instead, and
28

1 DUNNING told him to come in and speak with HANSEN. I.T. stated that, on the same day, he went to
 2 the primary AHA office and spoke with DUNNING and HANSEN. I.T. stated that he asked HANSEN
 3 to prove to him that the process results in citizenship. HANSEN told I.T. that it takes a long time.

4 96. I.T. stated that after the meeting, DUNNING, who said he had been with AHA for two
 5 months, followed I.T. into the parking of the primary AHA offices. I.T. stated that DUNNING asked
 6 him not to do anything or report the company for five months and DUNNING would be able to prove to
 7 him that the adult adoption process for the purposes of obtaining citizenship works.

8 97. I.T. stated that also on or about November 20, 2015, he separately called WEEKES on a
 9 phone number I.T. found on an AHA YouTube video that featured WEEKES, HANSEN, and two
 10 others. I.T. asked WEEKES if the adult adoption process for the purpose of obtaining citizenship was
 11 "legit." WEEKES replied that it was.

12 98. I.T. stated that "seven to eight years ago," I.T. attended a meeting given by HANSEN,
 13 who was at that time the leader of an organization called "PFI." I.T. stated that HANSEN advertised a
 14 program where people would pay him \$100 and then receive a house or two houses ten years later.

15 **O. Interview of Former AHA Recruiting Agents**

16 99. On or about August 25, 2015, SA Squire and I interviewed G.C., T.N., and H.N. after
 17 they filed a complaint with Homeland Security relating to AHA's adult-adoption-to-citizenship scheme.

18 100. G.C., T.N., and H.N., and an associate named L.D. met HANSEN and WEEKES through
 19 a mutual contact. They learned that WEEKES was the trainer and supervisor for new AHA "agents,"
 20 who were supposed to recruit clients for adult adoptions through AHA in conjunction with NHPI.
 21 Training sessions took place at the primary AHA offices. HANSEN told the group that his goal was to
 22 make 400,000 people United States citizens in the next year. HANSEN claimed he had the endorsement
 23 and encouragement of a retired Supreme Court Justice, who HANSEN claimed to have met in
 24 Washington, D.C. HANSEN also said he met with the IRS, the FBI, and with a top regional director of
 25 Homeland Security, all of whom told HANSEN that the adult-adoption-to-citizenship process was 100%
 26 legal.

27 101. HANSEN told G.C., T.N., H.N., and L.D. that AHA offered educational training classes
 28

1 on how to set up bank accounts and portfolios, among other classes. HANSEN also claimed that he had
2 personally adopted seventeen people and had been doing adult adoptions for twelve years. HANSEN
3 claimed he had exclusive rights to the adult adoption process because he trained twenty USCIS officers
4 on how to process the paperwork and the FBI had cleared him to do the process.

5 102. G.C., T.N., H.N., and L.D. became involved with AHA as adult adoption agents together
6 in approximately May 2015. They went to the primary AHA offices seven to eight times for training,
7 which was primarily rhetoric about the company. During the first training session, there were
8 approximately twenty other prospective agents. During the second training, there were approximately
9 fifteen other prospective agents. During the last training, there were approximately six other prospective
10 agents, including two people from Canada. They were shown a PowerPoint presentation about the adult
11 adoption process.

12 103. AHA representatives claimed that within twelve months an applicant would have a
13 passport, making them a United States citizen. AHA representatives also claimed that they had never
14 failed, so no clients had ever asked for their money back. A "huge" packet was passed around during a
15 training session to show what an adult adoption applicant would have to complete. There was "nothing
16 of substance" in the packet other than a court order, a birth certificate, and an IRS form 1040. The rest
17 of the papers were certificates of completion from different AHA programs and mail in a person's new
18 adopted name.

19 104. G.C., T.N., H.N., and L.D. found three clients for the AHA adult adoption process.
20 Before recruiting those clients, G.C., T.N., H.N., and L.D. traveled to the Alameda County Courthouse,
21 in Oakland, to observe two adult adoption proceedings. Both proceedings were held before a particular
22 Superior Court Judge ("Judge One"). The first proceeding, which occurred in or about June 2015,
23 involved three adoptions.

24 105. G.C. stated that after an adult was adopted, AHA called the next step "migration." This
25 involved receiving a new name and birth certificate, a driver's license in the new name, a tax
26 identification number, IRS clearance with a W-7 Form, a Social Security number, and finally a United
27 States passport and, ultimately, United States citizenship.
28

1 106. G.C., T.N., H.N., and L.D. formed an “agency” called American Dreams Solution. They
2 were only allowed to do this after they paid a “chamber of commerce fee” of \$1,500 to AHA. HANSEN
3 wanted them to use the name AHA instead of American Dreams Solution.

4 107. G.C., T.N., H.N., and L.D. recruited three clients, each of whom paid \$7,000. The
5 \$7,000 fee paid for the adult adoption process but did not cover court fees or fees to file other forms, for
6 which the applicants were responsible. G.C., T.N., H.N., and L.D. were told by an AHA representative
7 that they would become “full agents” of AHA once they had recruited more people. Their commission
8 was \$1,500 per adoption applicant, so they wrote a check to WEEKES, personally, for \$5,500 per
9 recruited applicant. They asked HANSEN why they wouldn’t make the check out to the company, and
10 HANSEN told them it was fine because WEEKES was affiliated with AHA.

11 108. T.N. and H.N. asked WEEKES for a contract to show that they were all affiliated with
12 AHA. WEEKES promised one but on or about August 21, 2015, WEEKES said it had been accidentally
13 deleted from his computer. G.C. and his partners dealt primarily with WEEKES.

14 109. G.C. stated that in or about August 2015 he and his partners began to question the AHA
15 adult-adoption-to-citizenship program and asked WEEKES to show them proof of its legitimacy,
16 including evidence that a person had completed the process through citizenship. WEEKES showed G.C.
17 and his partners VIOLA’s passport, which G.C. and the others observed did not display the hyphenated
18 surname that was a common feature of the adoption process. WEEKES explained that no hyphenated
19 surname appeared on the passport because VIOLA had changed her last name back to “Hansen” after
20 being adopted. Later, G.C. and the others asked HANSEN to see another, more recent example of an
21 adult adoption that resulted in United States citizenship. HANSEN stated that he could not show
22 someone’s social security number or passport. Later, G.C. and the others asked SEVIER for the same
23 proof and SEVIER stated, in substance, “You wouldn’t like us to show your private information to other
24 people, so we can’t show other people’s to you.”

25 110. G.C., T.N., and H.N. began to doubt AHA’s legitimacy and were afraid they could be
26 sued by the three clients from whom they had accepted payment. G.C. stated that the group spoke with
27 four or five immigration attorneys, who all said the program was a scam and that only those under the
28

1 age of sixteen could obtain citizenship through adoption.

2 111. G.C. stated that a Fijian man visited his office and told G.C. that, three years ago, AHA
3 came through Redwood City and Union City, California, and took money from approximately 200
4 people for the adult adoption program. None of those 200 AHA "customers" obtained citizenship as a
5 result of the adoption program. The man explained that he and the other victims of AHA's adult-
6 adoption-to-citizenship scheme never sued AHA because they never signed any paperwork with AHA
7 and they were afraid of being deported. G.C. and his partners brought this up to VIOLA, who said those
8 individuals did not receive their citizenship because they didn't follow AHA's program. WEEKES
9 provided the same answer. VIOLA also claimed that "rogue" AHA agents in Minnesota had failed to
10 correctly follow the AHA adult-adoption-to-citizenship program.

11 112. G.C. stated that AHA, NHPI, and CIBO, were all essentially the same company run by
12 HANSEN and that HANSEN was selling stock in CIBO. G.C. stated that CIBO was an import and
13 export company dealing with the Fijian Islands and other islands, and that CIBO had recently acquired a
14 new import/export warehouse near the AHA location (the secondary AHA offices).

15 113. G.C. stated that in or about June 2015, HANSEN visited Fiji to recruit customers for the
16 AHA adult-adoption-to-citizenship program. G.C. stated that several months before the interview with
17 law enforcement agents, HANSEN flew to Las Vegas, Nevada, and spoke in front of Amway agents in
18 an effort to recruit them to be AHA recruiting agents. G.C. also stated that HANSEN hired WEEKES to
19 expand the recruiting of AHA agents. Previously, HANSEN primarily used family and friends as agents
20 to recruit people for the adult-adoption-to-citizenship scheme. G.C. stated that WEEKES was assisted
21 by two AHA recruiters, ANDERSON and GARRISON, and that ANDERSON ran a financing program
22 for any adult adoption applicants who could not afford to pre-pay the \$7,000 fee.

23 114. G.C. stated that when he and his partners went to court to observe the adult adoptions,
24 SEVIER's step-daughter and assistant, J.V. accompanied SEVIER to serve as a Spanish translator.
25 G.C. asked J.V. if she had ever seen a passport of someone who had completed the adult-adoption-to-
26 citizenship program and J.V. stated she had. VIOLA was at court both times G.C. and his partners
27 attended. VIOLA stated that AHA liked Judge One because he was "adoption friendly."
28

115. G.C., T.N., and H.N. provided law enforcement agents with various written materials produced by AHA and AHA-affiliated organizations, including (1) brochures from AHA, NHPI, and CIBO; (2) an IRS response from a submission of a form 1040; (3) a delayed birth certificate; (4) a court order; and (5) an AHA information pamphlet. The IRS response, the birth certificate, and court order were provided to G.C., T.N., H.N., and L.D. as proof of the purported legitimacy of AHA's adult-adoption-to-citizenship scheme.

116. On or about August 25, 2015, G.C. delivered several emails to SA Squire and me with correspondence between him, his associates, and AHA, ^{which BC [signature]} included a copy of an AHA slide presentation used during a training session G.C. attended. The following are four sample pages of information from that slide presentation which illustrate: (a) AHA's promises to potential victims that its program will result in United States citizenship in twelve months; (b) AHA's advice to prospective agent/recruiters concerning how to reassure skeptical prospective "customers," including by explaining that proof of the legitimacy of AHA's adult-adoption-to-citizenship scheme is unavailable because of privacy laws; (c) AHA's fee for its services; and (d) post-adoption photos in Judge One's chambers, captioned with the lulling misrepresentation, "Let's Celebrate that Our Court-Approved Program Works!!" (emphasis in original). WEEKES and VIOLA appear in the center photo. G.C., T.N., H.N., and L.D. appear in the lower left photo.

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AHA Migration Program Solution

- Get legal Citizenship in twelve months
- New Birth Certificate & Identification papers
- Better Job opportunities and higher pay
- No travel restrictions in or out of the USA
- Petition for your relatives
- You can change your name to one that you like



Frequently Asked Questions

- **What guarantee do I have that the program will work?**

Tell us the truth, you will leave the Superior Court with an adoption order, signed by a Superior Court Judge and receive a state birth certificate with your new adopted name

- **This is too good to be true!** The people who have gone through the complete process can tell you themselves

- **Can you show us a complete case file?** The Agencies obligation, by Law, is to protect our clients from unwanted intrusion in accordance with the privacy *Act of 1974*



So, What is the Catch?



- Join Americans Helping America Chamber of Commerce
- Complete membership application
- Membership cost of \$7,000



Recent Migrations in California Court



Pictures are better than
a thousand words !



Our Clients are
Happy! Happy! Happy!

His Honor, the Judge is
Happy!



Your NDA, The Judge,
and Mrs. Hansen are
very Happy !



Lets Celebrate that Our Court Approved
Program works !!



1 **P. Bank Records for AHA, NHPI, HANSEN, and VIOLA**

2 117. In connection with my preparation of this Affidavit, I examined bank records from a
3 large financial institution for six accounts associated with AHA, NHPI, and CIBO (two separate
4 accounts for each entity) and two personal accounts held separately by HANSEN and his wife, VIOLA.
5 All eight accounts are associated with the HANSENS' personal residence. HANSEN and VIOLA are
6 authorized signatories for four of the six AHA-related accounts, and the sole authorized signatories for
7 the newest AHA account, opened in approximately February 2015. VIOLA is an authorized signatory
8 on two NHPI accounts and her personal account. HANSEN is the only authorized signatory for his own
9 personal account. All six of the AHA-related accounts were opened between approximately July 2011
10 and February 2015. HANSEN and VIOLA's personal accounts were opened on or about the same day
11 in September 2011.

12 118. In or about October 2015, an FBI forensic accountant performed an analysis of the eight
13 accounts identified above for the period from approximately September 17, 2012, to approximately July
14 28, 2015. During that period, there were over 300 deposits into the two AHA accounts and one of the
15 NHPI accounts totaling over \$500,000. The vast majority of those deposits were checks written to AHA
16 or NHPI from individuals. Many of those checks included in the memo lines the words: "membership,"
17 "adoption," "adult adoption," or a particular individual's name.

18 119. I also examined bank records from a large financial institution for an account associated
19 with WEEKES, registered to his home address on Grace Avenue, in Sacramento, California. The
20 account was opened in or about June 2013. On or about December 9, 2015, an FBI forensic accountant
21 performed an analysis of the account for the period between approximately January 1, 2015, and
22 approximately October 31, 2015. During that period, WEEKES wrote twenty checks to AHA, totaling
23 over \$118,000. A person's name appears on the memo line for all but one of those checks. The single
24 check that did not list a name on the memo line instead stated: "AHA adoption," on the memo line and
25 was written for \$18,000. Two of the checks from the group referenced above specifically mentioned
26 "adoption" on the memo line, along with a person's name. One of the checks, written for \$9,000, said
27 "Adult Adoption ([B.])" on the memo line and another check, written for \$4,000, said "AHA/Adoption
28 [J.G.M.]."

120. During the period between January 1, 2015, and approximately October 31, 2015, WEEKES also wrote approximately fifteen checks to individuals. Five of those checks had a combination of the words "adoption," "AHA," and/or a person's name written on the memo line. For example, a \$1,500 check was written to an individual with the initials J.S.R. on or about July 15, 2015, with the words "AHA Adoption [S.G.]," written on the memo line. Eight other checks had only a person's name in the memo line. The remaining two checks were written to ANDERSON and GARRISON with the words "Anthony Anderson SRA" on the memo line.

Q. CS-1's Reporting and the April 2015 USCIS Tour of AHA's Facilities

121. CS-1 was recruited by the FBI during this investigation. CS-1 has no criminal history and was paid a total of \$250 for services related to this investigation. During the course of this investigation, CS-1 has provided information that law enforcement agents have independently corroborated and found to be truthful.

122. During a debrief with law enforcement agents, on or about April 4, 2015, CS-1 stated that CS-1 received information from employees of AHA that "INS" representatives visited the business primary AHA offices on April 3, 2015. Those AHA employees told CS-1 that HANSEN gave the "INS" representatives a tour of the AHA offices and lied to the agents about the nature of immigration services provided by the company. Those AHA employees told CS-1 that before the "INS" visited, HANSEN coached members of his staff about how to respond to the representatives, and that HANSEN asked two employees – one of whom was not a United States citizen – to go into a room and to lock the door before the "INS" representatives arrived. Those AHA employees told CS-1 that after the "INS" representatives left the AHA facility, SEVIER asked the staff to assist a new family with signing up for the adult adoption process.

123. I am aware that on or about April 3, 2015, SA Squire accompanied a group of USCIS representatives on a walking tour of the primary AHA office. The tour was the result of an invitation from HANSEN to USCIS representatives. SA Squire made an audio recording of the discussion during the approximately two-hour tour, and I have listened to parts of that recording.

124. At the outset of the tour, a USCIS officer declined HANSEN request to videotape the

1 tour and told HANSEN that, by its presence, USCIS did not intend to endorse HANSEN's adult-
2 adoption-to-citizenship program. During the tour, HANSEN told the group, among other things, that a
3 retired U.S. Supreme Court Justice had written a law permitting the alternative route to citizenship that
4 AHA was offering. HANSEN declined to identify the retired Justice by name, claiming that he wanted
5 to protect the retired Justice's privacy.

6 125. During the April 3, 2015 tour of AHA's primary office, HANSEN also stated that AHA
7 retained an unpaid board of directors with fourteen members, including attorneys, immigration
8 attorneys, a NASA scientist, and two retired judges. HANSEN stated that AHA brings people from
9 Hawaii to California to complete adoptions because California is the easiest state in which to complete
10 adoptions. HANSEN stated that adoptions involving minors are handled by "you guys," referring to
11 USCIS, and all the others are handled by the states. HANSEN stated that 500 people have been adopted
12 through the AHA adult-adoption-to-citizenship program and he predicted that number would grow to
13 400,000 by the end of 2016.

14 126. During that April 3, 2015 tour of AHA's primary office, HANSEN told USCIS
15 representatives that AHA charges "members" \$5,000 per year to help them through the adult adoption
16 program. AHA does everything needed in the process. Members are not charged per case, they are
17 charged for their membership. If a member's case is not completed during a membership year, the
18 member is required to renew her/his membership.

19 127. When explaining how adult adoption leads to citizenship, HANSEN stated that when a
20 person is adopted in America, by a court of America, and by a judge of America, it is the same as a
21 person being born in America. HANSEN stated that AHA had filed one application for naturalization
22 and was working on a "few hundred" more. HANSEN stated that AHA did not just prepare the
23 naturalization paperwork like an attorney would but also had paralegals that help people complete the
24 USCIS paperwork. HANSEN stated that AHA paralegals were attorneys in other countries who do not
25 want to practice law in the United States. HANSEN stated that all the paperwork is stored at AHA in a
26 locked file room.

27 128. During that April 3, 2015 tour of AHA's primary office, HANSEN introduced the USCIS
28

1 representatives to WEEKES and SEVIER, and described their leadership roles in AHA.

2 129. CS-1 informed law enforcement agents that J.V., a former employee of AHA, is the step-
3 daughter of AHA CEO, SEVIER. CS-1 stated that J.V. served as a Spanish language translator for
4 SEVIER and had complained to CS-1 about SEVIER lying to undocumented immigrant applicants,
5 specifically promising them citizenship in under a year. CS-1 reported that J.V. told CS-1 that she was
6 aware that defrauded AHA victims were afraid to come forward to authorities because AHA members
7 had insinuated that if they spoke with authorities, they would be deported.

8 130. CS-1 also stated that J.V. told CS-1 that an AHA lawyer left AHA in October 2014
9 because the lawyer thought many of AHA's practices were fraudulent. The lawyer refused to sign
10 documents prepared by AHA and advised others not to sign any AHA documents. After leaving AHA,
11 the lawyer emailed AHA and asked for her name and picture to be removed from any documents or
12 AHA promotional materials. CS-1 also reported that AHA moved their adoption petitions to Alameda
13 County because Sacramento County Judges began denying all of the AHA-sponsored applications.

14 131. On or about October 8, 2015, a current employee of AHA told CS-1 that on or about on
15 September 26, 2015, AHA held the grand opening of its new building, where CIBO is primarily housed
16 and where AHA business occurs. The AHA employee said that HANSEN and VIOLA spent weeks and
17 thousands of dollars collecting thrift store furniture for the new office. They also gathered approximately
18 thirty to sixty old computers so all of the empty offices and cubicles would look full and operational.

19 132. On or about October 29, 2015, CS-1 reported that V.T., a current AHA employee, told
20 CS-1 that HANSEN had convened a meeting of AHA staff after HANSEN fired an AHA paralegal who
21 accused HANSEN of lying. During that meeting, HANSEN assured the AHA staff that everything
22 AHA did was legal. HANSEN also stated that twenty-seven people had completed the adult adoption
23 process and become United States citizens. However, HANSEN stated he could not reveal the identities
24 of those twenty-seven purportedly successful applicants because of privacy laws. CS-1 also reported
25 that HANSEN told pending participants in the adult-adoption-to-citizenship program that an individual
26 tax identification number ("I-TIN") is the same thing as a Social Security Number and once an applicant
27 receives an assigned I-TIN, that applicant is a United States citizen.
28

1 133. CS-1 also reported that V.T. is now in charge of the AHA adult adoption files. V.T. keeps
2 some of those files in paper form in his desk and others, in electronic form, are on an unrestricted AHA
3 server. V.T. has recently grown suspicious of HANSEN's conduct and AHA's adult-adoption-to-
4 citizenship program and is currently compiling a list of "lies" told by HANSEN and SEVIER. V.T.
5 works directly under FALA, the CEO of NHPI.

6 134. CS-1 also reported that an AHA employee told CS-1 that WEEKES, the CEO of CIBO,
7 gave a class to Filipinos who WEEKES recruited to be adult adoption agents. WEEKES was looking to
8 increase his adult adoption numbers through the Filipino immigrant community. The employee
9 overheard SEVIER and WEEKES discussing a plan to recruit 1,000 people for the adult adoption
10 program before they "build out." The employee also told CS-1 that two young women who are fluent in
11 English and Spanish quit after refusing to lie to potential victims on behalf of SEVIER.

12 135. According to CS-1, AHA primarily uses shared drives. They have two Ubuntu servers
13 that are operated by Lennox software and concurrent hard drives that back each other up. AHA keeps
14 all of its adult adoption file cabinets in their file room. All AHA employees have access to the shared
15 drives.

16 **R. Alameda County Investigation into Fraudulent Adoption Petitions**

17 136. In or about November 2015, Lieutenant Jim Taranto ("Lt. Taranto") of the Alameda
18 County District Attorney's office provided the United States Attorney's Office in the Eastern District of
19 California ("USAO") with an investigative report related to AHA. The USAO forwarded this report to
20 me. According to the report, on or about June 24, 2015, Lt. Taranto met with a Superior Court Judge
21 ("Judge Two"), of Alameda County, and the Alameda County clerk to discuss seven adult adoption
22 petitions filed between January and June of 2015. Four of the seven petitions were filed by the same
23 adoptive parent. Only two of the petitions were granted, and they have since been revoked by the court.
24 Judge Two based her revocation on her suspicions and belief that the adult adoptions were for reasons
25 other than stated in the petitions and were likely not in the best interest of the adoptees.

26 137. On or about July 10, 2015, Lt. Taranto met with the Judge One and his clerk from
27 Department 13 in Alameda County, which handles all of the adoptions at the Rene C. Davidson
28

1 courthouse. The clerk told Lt. Taranto that she had seen an unusual increase in adult adoptions over the
2 last one to two years. The adult adoptions were largely facilitated by an agency known as AHA from
3 Sacramento, California. Many of the AHA petitions were from the same adopting parents for multiple
4 adoptions of adults. Additionally, the addresses listed for adoptees were often the same across separate
5 petitions seeking adult adoptions.

6 138. The clerk provided Lt. Taranto with documents listing the names, addresses, and dates of
7 birth for thirty-five pending adult adoptee petitions with hearing dates scheduled through October 2015.
8 Lt. Taranto found that seven addresses were repeated as the home address for separate adoptees on
9 different petitions. The most commonly used addresses were: 1820 Jefferson Street, in Oakland,
10 California, and 2670 25th Avenue, in Oakland, California. Lt. Taranto printed Department of Motor
11 Vehicle ("DMV") photographs of every prospective adoptee that he could find and visited the two
12 addresses.

13 139. On or about July 15, 2015, LT. Taranto visited 1820 Jefferson Street, in Oakland,
14 California. The numbers "1820" were painted on one side of the building, where there appeared to have
15 been an entry at one time, but was now boarded up and painted over. The only available entrance to the
16 building was a door displaying the address of "1825" for a business listed as East Bay Asian Local
17 Development Corporation. Lt. Taranto entered the office and spoke with a receptionist who informed
18 him that their company was the only occupant of the entire building, and has been for the last two years.
19 Neither she nor their director knew anything about the address of 1820. The receptionist had never
20 heard of any of the adult adoptee petitioners that listed 1820 Jefferson Street, Oakland, California, as
21 their residence.

22 140. On the same day, Lt. Taranto also visited 2670 25th Avenue, in Oakland, California,
23 which he described as a residential "four-plex." He interviewed the residents of apartments #1 and #2,
24 who were relatives, and who also knew the residents in the remaining two apartments. They stated that
25 they had lived in the building for the last four years. Lt. Taranto showed the residents photographs of
26 the adult adoptee petitioners that listed 2670 25th Avenue, in Oakland, California, as their residences.
27 The residents had never seen any of the persons in the photographs before and said that none of them
28

1 lived in the building in the last four years. They also did not recognize the name of a petitioner of whom
2 Lt. Taranto did not have a photograph. Lt. Taranto checked the names on the four mailboxes in the
3 building and none of the relevant names were listed.

4 141. On or about July 16, 2015, Lt. Taranto met with the Judge One, who asked him to
5 interview relevant parties present for an adoption hearing involving AHA the following day. On or
6 about July 17, 2015, Lt. Taranto met with and identified the relevant individuals as C.P., the adoptee;
7 WEEKES, the adoptive parent; and VIOLA, the AHA representative.

8 142. Lt. Taranto first interviewed C.P., who said she had known WEEKES for about eight
9 years after meeting him through a mutual friend. C.P. could not recall the friend's last name, nor did
10 C.P. know how to contact him. C.P. said she lived in Sparks, Nevada, and not at 2670 25th Avenue, in
11 Oakland, California, which was the address listed on her adoption application. C.P. stated that she had
12 never been to that Oakland address. When asked why C.P. wanted WEEKES to adopt her, C.P. stated,
13 "to have a good life in America," and "to have the privilege and help of a family." C.P. also stated that
14 the adoption would permit her to obtain a better job.

15 143. Lt. Taranto also interviewed WEEKES, who claimed to work full time for a part of AHA
16 that assists immigrants from Fiji when they arrive in the United States. WEEKES stated that the
17 purpose of the adult adoption of foreign citizens was to make their transition to United States citizenship
18 easier than if they were not adopted by United States citizens. WEEKES stated that he had only known
19 C.P. for five to six months, but was fully aware that she lived in Nevada. He initially denied knowing
20 why her adoption documents identified her address as 2670 25th Avenue, in Oakland, California. He
21 later admitted AHA falsely used that address to make "pushing through" the adoption easier in Alameda
22 County.

23 144. Lt. Taranto also interviewed VIOLA, who stated that she was married to HANSEN, who
24 was the chairman of the board of directors for AHA and NHPI. VIOLA claimed to hold no official
25 position at either company, though Lt. Taranto discovered the organization's website listed her as the
26 president of NHPI. Lt. Taranto described VIOLA's behavior during the interview as "evasive" and said
27 that she denied any knowledge of who in the organization completes the adoption paperwork. When
28

1 asked about the purpose of the AHA-facilitated adult adoptions, VIOLA stated that the adoptees are able
2 to obtain a new birth certificate with a new name. However, VIOLA admitted that the adult adoption
3 process does not automatically result in United States citizenship and adoptees must still go through the
4 immigration process to become United States citizens. VIOLA said there is no money exchanged
5 between the adoptee and AHA or NHPI, but they had to pay a basic membership fee which she said is
6 \$150 for the first year and \$300 for the second year with additional annual increases. VIOLA claimed to
7 have met C.P. that day and to have no knowledge of why an Oakland address was used on C.P.'s
8 adoption application.

9 145. After the interviews, Lt. Taranto told all three individuals that Judge One had denied the
10 adoption due to the false information contained in the petition. VIOLA said she was embarrassed and
11 that she would speak with HANSEN about apologizing. Additionally, she said all pending petitions
12 would likely be withdrawn once all parties were notified and she didn't expect the court to consider any
13 petitions sponsored by AHA.

14 146. On or about July 28, 2015, Lt. Taranto investigated the addresses listed on the petitions of
15 five other AHA-sponsored adult adoptees that had been filed with the Alameda County Court. The first
16 petition, for I.M., listed an address of 1820 Jefferson Street, in Oakland, California, an address Lt.
17 Taranto knew to be uninhabited. The second petition, for R.G., listed an address of 5760 Foothill
18 Boulevard, #A, in Oakland, California. Lt. Taranto interviewed a woman at that address, whose family
19 had lived there for over two years. The woman stated she had never heard of the adoptee, the adopter,
20 AHA, or NHPI; and she stated that no one besides herself, her baby, and her parents lived in the
21 apartment. The third petition, for D.Z., listed an address of 7301 Hillside Street, in Oakland, California.
22 Lt. Taranto interviewed two women at this address. Both had lived at the apartment for two months and
23 still received mail for the prior residents. No mail for D.Z. had ever been delivered to them. They had
24 never heard of her or her adopter. The fourth petition, for J.C., listed an address of 2369 103rd Avenue,
25 in Oakland, California, and listed **SEVIER** as the proposed adoptive parent. J.C.'s DMV photograph
26 listed his address in Richmond, California. Lt. Taranto interviewed a woman at the address, who stated
27 she had lived there with her mother for over ten years. They rented the house from an adjacent Tongan
28

1 Methodist Church. They did not recognize the photograph of J.C. and said the adjacent home was also
2 occupied by Tongan members of the church. The woman had never heard of SEVIER. The final
3 petition, for M.R., also listed 2369 103rd Avenue, in Oakland, California as the petitioner's home
4 address. The actual occupant stated that M.R. did not live there and that she had never heard of M.R.

5 147. In sum, Lt. Taranto found that the first seven of the thirty-five AHA-sponsored adult
6 adoption petitions referred to him by the Alameda County court, listed false addresses for the petitioner.
7 On that basis, Lt. Tarantino recommended to the Alameda County Court that adoption applications
8 sponsored by AHA were more likely than not to contain false information and should be subject to
9 denial or severe scrutiny by the Court before disposition.

10 148. On or about September 21, 2015, SA Squire and I discovered a document during a trash
11 cover of the primary AHA office which listed each of the false addresses visited by Lt. Taranto, with the
12 exception of 5760 Foothill Boulevard. It also listed addresses that were used as the residence for
13 adoptees on several of the remaining thirty-five adult adoption petitions provided to Lt. Taranto by the
14 Alameda Court. The document was titled "Shelters for Alameda County," and a copy of it appears
15 below:

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SHELTERS FOR OAKLAND, ALAMEDA COUNTY

EAST OAKLAND COMMUNITY PROJECT

7515 INTERNATIONAL BLVD

OAKLAND, CA 94621

*7301 Hillside Street
Oakland, Ca 94605*

OPERATION DIGNITY INC

160 FRANKLIN ST #103

OAKLAND, CA 94607

*5427 Bankcroft
Oakland, Ca 94601*

*2369 103rd Ave
Oakland, Ca 94603*

OAKLAND HOMELESS PROJECT

1820 JEFFERSON STREET

OAKLAND, CA 94612

*clients names
JASON THOMAS*

*3014 Fruitvale Unit 3
Oakland, Ca 94602*

DURGA ENTERPRISE

2300 23RD AVENUE

OAKLAND, CA 94606

*1517 22nd Ave.
Oakland, Ca 94606*

*2670 25th Ave.
Oakland, Ca 94601*

*4310 Birch Street
Oakland Ca 94612*

149. On or about July 31, 2015, Lt. Taranto also spoke with J.S., Director of Court Services, for the Sacramento County Superior Court. J.S. told Lt. Taranto that in 2013, the Sacramento Family Courts received a large number of AHA-sponsored adult adoption petitions on behalf of Tongan citizens, including approximately thirty to forty petitions for a period of several months. Courts officials found this strange and began referring the AHA petitions to the Sacramento County Family Court Services Mediation Unit ("Mediation Unit"), which hired interpreters and interviewed the petitioner-adoptees. The Mediation Unit determined that the majority of the AHA-sponsored petitioner-adoptees had no information about the adoption, its purpose, and knew very little about their adoptive parents. Petitioner-adoptees who could not read English told Mediation Unit interviewers that the adoption documents they signed had never been translated for them and, instead, AHA staff instructed the

1 petitioner-adoptees to sign the forms and told them they would be able to obtain a green card after the
2 adoption was completed.

3 150. Some AHA-sponsored petitioner-adoptees told Mediation Unit interviewers that they
4 paid AHA \$2,000 for its services related to the adoption process. Based on the results of the Mediation
5 Unit's investigation, the judges in Sacramento County began routinely denying all AHA-sponsored adult
6 adoption petitions because of the evidence that they were not in the best interests of the adoptees. After
7 the Sacramento County Courts began denying AHA-sponsored adult adoption petitions, all pending
8 AHA-sponsored petitions were withdrawn. Later, the Sacramento County Court discovered AHA was
9 posting photographs of adoptee families with Sacramento County judges on the AHA website.
10 Sacramento County Court representatives sent a letter to AHA demanding it remove the photographs of
11 the judges, because the photos were never intended for commercial use to promote AHA. AHA
12 complied with the request.

13 **S. AHA's Online Presence and Promotional Videos**

14 151. Based on my investigation of this matter and my own Internet research and that of others,
15 I am aware that AHA and its subsidiaries maintain a presence on the Internet that includes a website for
16 each company, three YouTube channels, and social media activity. The company's social media
17 presence, including multiple Facebook pages, is primarily used to announce events, including for
18 example the November 7, 2015, opening of an AHA branch in Las Vegas, Nevada.

19 152. AHA's website is hosted at <http://americanshelpingamerica.us> (last visited January 6,
20 2016). This website has an "Immigration" page, which features YouTube videos of HANSEN and
21 others discussing the adult-adoption-to-citizenship scheme and expressly promising it as a means of
22 obtaining United States citizenship in English, Spanish, and what appears to be Bengali, the official
23 language of Bangladesh. The AHA website also has a link to a multi-page questionnaire that allows
24 people to sign up for the "Immigration Integration services section of the AHA Chamber of Commerce
25 Membership Package." See <http://immigration.americanshelpingamerica.us/> (last visited January 6,
26 2016).

27 153. On the "Immigration" page of AHA's website, under the heading: "Video Introduction to
28

1 AHA Immigration Integration,” are a series of three videos titled: “Light House Adoption 001,” “Light
 2 House Adoption 002,” and “Light House Adoption 003,” in which HANSEN is interviewed by an AHA
 3 adoption agent named Nahid Kabani (“KABANI”), who is responsible for recruiting adult adoptees
 4 from Middle Eastern communities. In the third video of the series, HANSEN explains that AHA’s
 5 program, from “A to Z ... is one year,” and discusses “the list of 24 steps [applicants must complete on
 6 the] road of citizenship.” In that video, HANSEN summarizes the AHA adult-adoption-to-citizenship
 7 program and states: “once that it’s all done, you complete as a citizen, [sic]” but also reiterates that “in
 8 order to become a citizen, you must comply.” See [http://immigration.americanshelpingamerica.us/light-](http://immigration.americanshelpingamerica.us/light-house-adoption-003/)
 9 [house-adoption-003/](http://immigration.americanshelpingamerica.us/light-house-adoption-003/) (last visited January 6, 2016).

10 154. NHPI’s website is hosted at <http://nhpi.us/>. The website also has an “Immigration” page,
 11 which features multiple YouTube videos of HANSEN and others explaining the adult adoption program
 12 as a means of obtaining United States citizenship, including a video addressing the Tongan community.
 13 See <http://nhpi.us/immigration/> (last visited January 6, 2016). There is also a video section of the
 14 website titled, “Successful Immigrants Spotlight.” See <http://nhpi.us/successful-immigrants/> (last visited
 15 January 6, 2016). In that section, there is only one video, which contains an interview of a U.S. Army
 16 Chief Warrant Officer in Hawaii by HANSEN. There is no indication that the service member obtained
 17 his citizenship through adult adoption and he did not appear to be affiliated with AHA, NHPI, or CIBO.

18 155. Additionally, on the NHPI website there is a list of nine adult adoption recruiting agents.
 19 Each agent has a YouTube video explaining their role with NHPI. The videos are in multiple different
 20 languages, based on their recruiting base. One man, who says he is in charge of NHPI in Reno, explains
 21 that he has adopted multiple people in San Mateo, California. There is also a list of NHPI locations
 22 nationally, split into thirteen geographic areas throughout ten states.

23 156. CIBO’s website is hosted at <http://www.ciboexport.us/>. (last visited January 6, 2016)
 24 The CIBO website has items for sale for import/export to the Pacific Islands and lists its affiliation with
 25 AHA. AHA also runs the website that is hosted at <http://pntv.us>, which is currently under construction.

26 157. Many of the YouTube videos posted by AHA discuss adult adoption. One victim, C.M.,
 27 specifically cited the videos as being part of the reason she believed adult adoption was a legitimate path
 28

1 to citizenship for her relative. Several YouTube channels are associated with AHA and its subsidiary
 2 organizations: <https://www.youtube.com/user/PNTELEVISION> (titled “Helaman Hansnen” [sic]) (last
 3 visited January 6, 2016); <https://www.youtube.com/watch?v=tP09JMQOKr8> (titled “AHA USA”) (last
 4 visited January 6, 2016); and <https://www.youtube.com/channel/UC6a2gi9fs0lMjNjRUEbcYjA> (titled
 5 “Sela Hansen”) (last visited January 6, 2016). Sela Hansen is another name used by VIOLA.

6 158. The “Helaman Hansnen” [sic] YouTube page features more than thirty videos, aimed at
 7 members of various immigrant communities, which directly advertise AHA’s adult-adoption-to-
 8 citizenship scheme as a pathway to United States citizenship. Among the recent videos HANSEN has
 9 caused to be uploaded to this YouTube channel is a video uploaded on or about December 10, 2015, in
 10 which HANSEN pitches adult adoption to potential adopters as a manner to improve their families and
 11 create a “family foundation.” HANSEN also states that in addition to his six biological children, he has
 12 adopted twenty-two adult children. See <https://www.youtube.com/watch?v=URiLU8uqGU0> (last visited
 13 January 6, 2016).

14 159. Among other videos on the “Helaman Hansnen” [sic] YouTube page is another series of
 15 video discussions between HANSEN and KABANI titled: “US Citizenship Through Adult Adoption
 16 [parts 1 through 4].” In those videos, HANSEN discusses the AHA adult-adoption-to-citizenship
 17 scheme. See <https://www.youtube.com/watch?v=eVgd9KD2ISs> (last visited January 6, 2016). In the
 18 fourth video in that series, HANSEN claims that the “law” permitting AHA’s adult-adoption-to
 19 citizenship program is not an America law. Rather, HANSEN claims that the program is permitted
 20 under a United Nations law which provides that a person adopted in a court of a particular country
 21 receives the same citizenship rights as if that person was born in that country. HANSEN goes on to state
 22 that through AHA’s program, AHA customer “inherit the citizenship rights” of the adopting parent(s).
 23 See <https://www.youtube.com/watch?v=lejLGeZLNn8> (last visited January 6, 2016). HANSEN states
 24 that the program can take up to two years because of government delay but that AHA works accomplish
 25 its efforts within twelve months. Id. HANSEN also states that “the process of this whole thing, it’s a
 26 legal process, it’s step-by-step, all the way through and it’s all done correctly according to the law.” Id.

27 160. On November 14, 2015, HANSEN caused to be uploaded to the “Helaman Hansnen”
 28

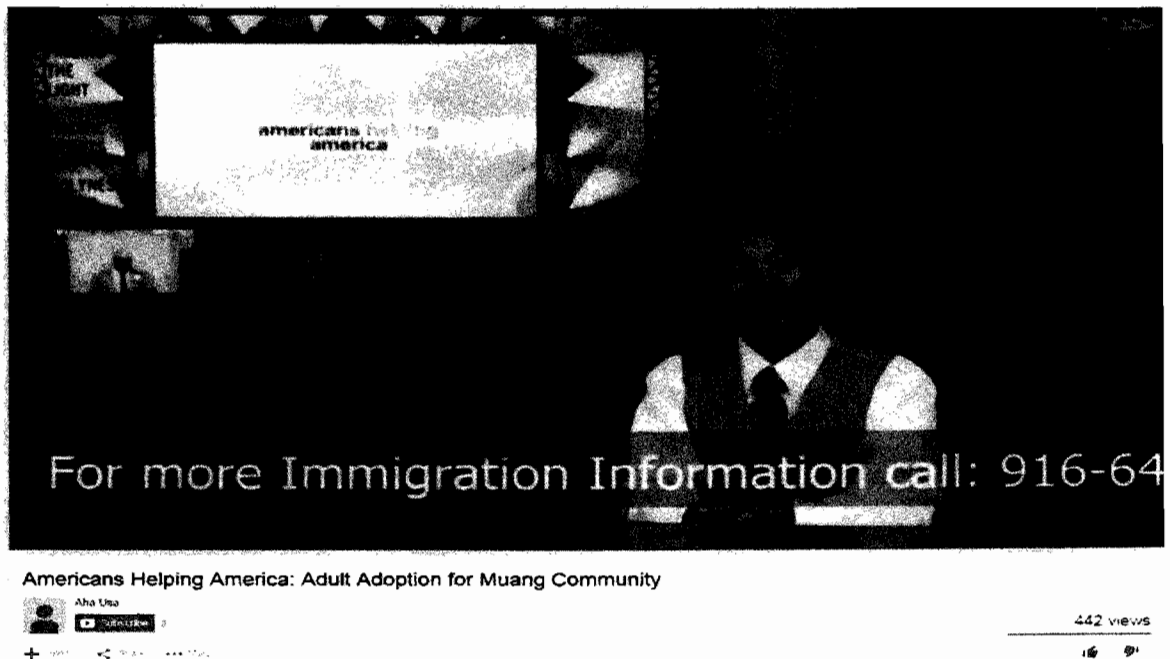
1 [sic] YouTube page a six-part interview between himself and AHA's new "Director of Migration,"
2 DUNNING, titled: "Migration Update 1" through "Migration Update 6." (HANSEN appears to have re-
3 uploaded "Migration Update 1" on or about December 8, 2015). See
4 https://www.youtube.com/watch?v=3b1qQF5S_pk (last visited January 6, 2016). In the videos,
5 DUNNING and HANSEN sit side-by-side and talk. Among other things, DUNNING states that AHA
6 operates from sixteen offices and is looking to expand to more. DUNNING further explains that AHA
7 assists people with adult adoptions.

8 161. Specifically, DUNNING explains that once a person is adopted, the court will send that
9 applicant's paperwork "to another area within the government," which will then "produce a birth
10 certificate for this adoptee. That allows them to start the process of immigration. And then what
11 happens is they will come back to us with documents and we will then send that information to the IRS
12 to get them an [tax identification] number, which then allows them to pay taxes." DUNNING further
13 states, "after that what happens is that we start building a profile with this person or with this family so
14 that person is able to get, you know, a bank account and a library card and different things that they have
15 built up over time so that when we have nearly completed that process, they're able to have a profile
16 about themselves that explains who they are as the new person or new name."

17 162. In the Migration Update videos, HANSEN goes on to discuss the difference between the
18 law of the United States and the law of God. DUNNING states, "right now, we are following the law
19 the best we can." Explaining the AHA "migration process," DUNNING states that once an adoptee has
20 a new birth certificate, AHA helps the person build a profile, meaning bank accounts, library cards, and
21 other things in their new adopted name to get their new name "put into the system." DUNNING states
22 that once an AHA applicant's "profile" is built up, AHA will send it to the Social Security
23 Administration, and thereafter, "Immigration" can verify the AHA applicant's new identity. In the
24 Migration Update videos, HANSEN claims that there are currently over 1,000,000 AHA members.

25 163. The "AHA US" YouTube channel offers a video titled, "Americans Helping America:
26 Adult Adoption for Muang Community." <https://www.youtube.com/watch?v=tP09JMQOKr8> (last
27 visited January 6, 2016). The video features HANSEN and an adult adoption agent named Yee Vang
28

1 (“VANG”). In the video, HANSEN refers to a United Nations law as justification for adult adoption
 2 and also states, “The law of the United States of America is: when a person is adopted in America by a
 3 court of America and by a judge of America, it’s the same thing as a person who is born in America.
 4 That’s the law of the United States. And that’s why adoption is a very powerful tool that we need to use
 5 because it’s established.” HANSEN continues to assert that after adoption is complete, citizenship
 6 follows. At one point, HANSEN corrects VANG and states that adult adoption results in citizenship by
 7 “operation of law” and that “the court of order” gives them that right. A screen-shot from that video is
 8 below:



21 164. The “Sela Hansen” YouTube channel also promotes adult adoption as a path to legal
 22 United States citizenship and shows footage of various grand openings and a trip to Fiji by HANSEN
 23 and WEEKES. See <https://www.youtube.com/channel/UC6a2gi9fs0IMjNjRUEbcYjA/videos> (last
 24 visited on January 6, 2016).

25 **T. Minnesota Court Rulings**

26 165. HSI discovered two Minnesota state court rulings on the adult adoption process from a
 27 Ramsey County, Minnesota, District Court (“Ramsey County District Court”). Both cases involved
 28

undocumented immigrants who paid AHA and NHPI \$3,999 to prepare and file adult adoption petitions. The agents of AHA and NHPI characterized these payments as "donations." The judge in those cases ruled that the AHA agents had violated Minnesota law by giving legal advice about immigration matters and preparing legal documents without being licensed attorneys. Further, the judge ruled that the adult adoption process for the purposes of obtaining citizenship was not in harmony with federal law. The judge denied both petitions on May 16, 2014. The Ramsey County District Court was also provided with some examples of materials provided to clients of AHA, including an AHA-prepared "Court Filing Procedures" pamphlet, that instruct adoptees, in part, to "Just smile to the Judge and do not ask question [sic]." It also states, "Sometimes the Judge will ask if everyone is happy and agree with the adoption, just say yes [sic]." Then, "The Judge will sign all the papers and hand them over to you and it's done."

A copy of the pamphlet appears below:



THE COURT FILING PROCEDURES

1. Once received the package open and read all the instruction and information about your case.
2. Open and sign all the required signatures above your printed names on every page.
3. Take the paperwork to the Family Court and file them at the court clerk.
4. The court clerk will assign a date for your case before the Judge at his chamber.
5. The court clerk normally schedule a date at least 4 weeks ahead.
6. The court clerk will give a date, time and which courtroom to appear before the Judge
7. When you go to the courtroom that day, let sheriff at the courtroom know that you are present.
8. The sheriff will give you the details of when to see the Judge.
9. When sheriff escort you to the Judge chamber, just smile to the Judge and do not ask question.
10. The Judge had checked all the papers, was filed with the court clerk previously.
11. Sometimes the Judge will ask if everyone is happy and agree with the adoption, just say yes.
12. The Judge will sign all the papers and hand them over to you and it's done.
13. Ask the Judge to take a photo with all of you as a historical day.

THE VITAL RECORD FILING PROCEDURES

1. The court report of adoption must be signed by a county clerk at the county recorder office.
2. The Judge signed 2 original copies of court order. One original copy together with the court report of adoption will be send to the vital record department.
3. It normally takes 6 weeks for the new birth certificate to arrive. (US birth certificate)
4. The other copy of the court order will be send to the immigration together with the new birth certificate, when arrived from the vital record office, to release your new social security number.
5. This process at the Immigration for a social security number takes 6 weeks.
6. This immigration process for citizenship certificate takes roughly 6 months.

Important Notice!

It is prohibited for anyone, who is not authorized to use these information, copy, edited, mortified or represented these information to a third party, without the permission of the Americans Helping America Agency administration and is punishable by law.

U. **Effect of Adoptions Under the INA and Rejection of AHA-Sponsored Forms I-130**

166. The final step of AHA's adult-adoption-to-citizenship scheme was the submission to USCIS of a Form I-130, Petition for Alien Relative ("Form I-130"). However, the instructions on the face of the Form I-130 clearly state that it is intended to be used only in connection with adoptions of persons under the age of sixteen, and not those who have been adopted as adults. A copy of those instructions appear below:

Who May Not File Form I-130?

You may not file for a person in the following categories:

1. An adoptive parent or adopted child, if the adoption took place after the child's 16th birthday, or if the child has not been in the legal custody and living with the parent(s) for at least 2 years prior to the filing of the petition.

167. During my investigation in this matter, I have reviewed relevant parts of the Immigration and Naturalization Act ("INA") concerning the limitations on immigration status adjustments for undocumented alien relatives and children adopted by United States citizens. I have discussed those matters with agents who have discussed them with USCIS officials and others. I have also reviewed legal decisions discussing those matters, including Hong v. Napolitano, 772 F.Supp.2d 1270, 1279 (D. Hawai'i 2011) (discussing adoption under the INA and holding rule rejecting *nuc pro tunc* adoptions after sixteenth birthday is arbitrary and capricious in case involving child whose adoption was final three weeks after sixteenth birthday), and Cantwell v. Holder, 995 F.Supp.2d 316 (S.D.N.Y. 2014) (same; involving child whose adoption was final nine months after sixteenth birthday). Accordingly, I am aware of the following general legal principles, which are set forth in the materials I reviewed:

- a) The INA imposes a numerical quota on the number of immigrant visas that may be issued and/or the number of aliens who may otherwise be admitted into the United States for permanent residence status. See 8 U.S.C. § 1151(a); see generally 8 U.S.C. §§ 1151–1381 (Subchapter II—Immigration).
- b) However, aliens who are "immediate relative[s]" of United States citizens are exempt

1 from these numerical limitations and may obtain immigrant visas by petitioning for immediate
 2 relative status. See id. § 1151(b)(2)(A)(i) (defining “immediate relatives”); id. §
 3 1154(a)(1)(A)(i) (setting forth petitioning procedure).

4 c) “Immediate relatives” include “children.” INA § 101(b)(1)(E), 8 U.S.C. §
 5 1151(b)(2)(A)(i). The statutory definition of “child,” for purposes of subchapter II of the INA,
 6 includes “a child adopted while under the age of sixteen years if the child has been in the legal
 7 custody of, and has resided with, the adopting parent or parents for at least two years.” 8 U.S.C.
 8 § 1101(b)(1)(E)(i).

9 168. Based on my investigation in this matter to date, I am aware that none of the AHA-
 10 sponsored adoption petitions discovered so far were issued *nunc pro tunc*. I am further aware that none
 11 of the AHA-sponsored adoptees in this case satisfy the INA’s statutory definition of “child.” Thus, I am
 12 aware that there is likely no plausible legal argument that AHA-sponsored adult adoptions, nearly all of
 13 which involve the adoption of adults who are years past the age of sixteen by non-relatives with whom
 14 the adoptees have never resided, will ever result in adjustment of an adoptees’ immigration status or
 15 United States citizenship.

16 169. Based on my investigation in this matter, including my discussions with USCIS officers
 17 and others, I am aware that HANSEN and AHA have submitted only two Form I-130 applications for
 18 consideration by USCIS, and USCIS has denied both. The first Form I-130 was submitted in 2012 for
 19 an adult adoptee with the initials A.M.M. USCIS denied that Form I-130 in or about October 2012 due
 20 to HANSEN’s failure to comply with procedural requirements and because the proposed adoptive parent
 21 was deceased. HANSEN did not file a timely appeal. After the expiration of the appeal period,
 22 HANSEN exchanged correspondence with USCIS in which HANSEN attempted to persuade USCIC to
 23 reverse its earlier decision. USCIS received the last such request from HANSEN in or about November
 24 2013. In or about February 2014, USCIS again issued a denial of HANSEN’s untimely appeal. In the
 25 original denial of that first Form I-130 application, USCIS specifically outlined why an adult adoptee
 26 could never result in citizenship through a Form I-130, namely because the process is intended for
 27 adopted aliens under the age of sixteen. HANSEN’s appeal letters did not address the petitioner’s age at
 28

1 the time of the adoption and, instead, focused on the character of the petitioner.

2 170. The second I-130 was submitted by HANSEN for an adult with the initials S.H., on or
3 about October 22, 2012, and was denied by USCIS on or about August 19, 2015. In a letter addressed to
4 HANSEN's residence, USCIS explained that the petition was denied because S.H. was forty-three years
5 old at the time of the adoption and that to qualify as an adopted alien child of a United States citizen for
6 purposes of obtaining citizenship, the adoption must occur before the child reaches the age of sixteen.
7 HANSEN did not appeal the denial of the second Form I-130 application. Although HANSEN and
8 AHA have been officially informed on two occasions that adoptees under the age of sixteen cannot
9 obtain citizenship through a form I-130, CS-1 reported on or about October 29, 2015, that AHA
10 continues to processing adult adoption applications. Additionally, HANSEN continues to solicit
11 "customers" for the AHA adult-adoption-to-citizenship scheme, including by posting new videos on
12 YouTube in November and December 2015.

13 **V. Mail Covers**

14 171. On or about July 21, 2015, a thirty-day mail cover for the HANSEN's personal residence
15 was approved by an FBI supervisor and fulfilled by the United States Postal Service. During the mail
16 cover period, I observed correspondence addressed to AHA, NHPI, CIBO, **SEVIER**, and other officials
17 of AHA and its subsidiaries, including correspondence from various banks, the California Franchise Tax
18 Board, and USCIS, all delivered to HANSEN's residence.

19 172. Also during the mail cover period, on or about August 19, 2015, USCIS delivered a letter
20 to HANSEN's residence (which was the address listed in the petition for the petitioner-adoptee), in
21 which USCIS denied the petition submitted for S.H. Later, USCIS confirmed that the denial letter was
22 delivered to HANSEN's residence.

23 **W. Trash Cover Results**

24 173. On or about September 21, 2015, and again on or about October 9, 2015, SA Squire and I
25 conducted trash covers of dumpsters removed from AHA's primary business address by Republic
26 Services in Rancho Cordova, California. We recovered items of literature for distribution that outlined
27 the adult-adoption-to-citizenship scheme as a legal path to citizenship in twelve months. The majority
28

1 of these items also offered opportunities to purchase shares of CIBO, which at the time had a suspended
2 business license for failure to pay California state taxes.

3 174. Another document discovered in the trash cover at the primary AHA offices, titled,
4 "Migration Paperwork Flow: July 14, 2015," ("Paperwork Flow") outlined the twenty-seven steps for
5 processing adult adoption paperwork at AHA. The Paperwork Flow showed that the file route for AHA
6 membership applications begins with HANSEN, who approves members seeking to join AHA, then
7 moves through several locations at the AHA primary offices, including the desk of V.T., the file room,
8 and the shared drive. According to the Paperwork Flow, once paperwork was complete it would be
9 moved to "\\MIGRATION\\COMPLETED_FORMS" under the "Member Files" folder on the company
10 shared drive. Completed paperwork would also be sent back to HANSEN "to be emailed to
11 immigration."

12 175. Transcripts of certain recordings were also recovered in the trash cover at the primary
13 AHA office. One such transcript, titled "Recording 18," outlines a sponsorship program in which a
14 Fijian would pay \$15,000 in exchange for sponsorship to the United States. This sponsorship would
15 allow for two paths to citizenship as part of a two year program. After one year, the first path allows the
16 Fijians to participate in a "legal process already available for adoption. This process will take only a
17 year to finalize their citizenship." The alternative program is explained as the "business track" and
18 suggests the Fijians file for a green card after having a business established for two years. Both
19 programs outline a full return of the \$15,000 after a five year period as a return on their investment.

20 176. Email communications relating to AHA and its subsidiaries were also recovered in the
21 trash at the primary AHA office. Two emails were discovered from fijianshelpingfiji@gmail.com. The
22 first was addressed to HANSEN at pntvinfo@gmail.com and listed six names of Fijians ready for
23 sponsorship letters. The second was addressed to WEEKES at newalow.weekes@ahaus.us and listed
24 six committee members for FHF. Two lists of members of FHF were discovered. One list had 267
25 names.

26 **X. No Law Enforcement Endorsement of AHA's Activities**

27 177. During this investigation, I reviewed FBI databases and discussed with agents of
28

1 Homeland Security Investigations to determine whether any interaction between these agencies and
2 AHA or HANSEN had occurred prior to this criminal investigation. I have found no evidence of any
3 interaction between HANSEN (or other representative of AHA or its subsidiaries) and the FBI, the
4 Department Homeland Security, or the IRS prior to this criminal investigation. Other than the March 3,
5 2015 USCIS tour of AHA's primary office – during which USCIS representatives affirmatively
6 disclaimed any endorsement of AHA's activities – I have found no evidence of any meaningful
7 collaboration or interaction between AHA or HANSEN and any federal law enforcement agency.

8 **Y. Search of AHA Offices and other Locations and Interview of HANSEN**

9 178. On or about December 22, 2015, law enforcement agents executed court-approved search
10 warrants at the offices of AHA and its related entities at two separate locations in Sacramento and at
11 HANSEN's residence in Elk Grove (the "December 22, 2015 Searches"). Among other things, agents
12 recovered paper and electronic documents and records concerning AHA's adult-adoption-to-citizenship
13 scheme. Those documents and records include files relating to victims of the scheme that contained
14 identity information, payment records, adult adoption petitions, delayed birth certificates, evidence of
15 mailings and wire transactions, and other evidence of the operation of AHA's adult-adoption-to-
16 citizenship scheme.

17 179. During the December 22, 2015 Searches, HANSEN agreed to participate in a voluntary
18 interview with law enforcement agents. Agents advised HANSEN that he was free to decline to
19 participate in the interview or to end the interview at any time. Agents also recited the Miranda
20 warnings to HANSEN, who acknowledged those rights before agreeing to answer questions. Law
21 enforcement agents made an audio recording of the interview with HANSEN.

22 180. During the interview, HANSEN stated that in 2003 he spoke to a United States Supreme
23 Court Justice who HANSEN claimed explained to HANSEN the legal justification for AHA's adult-
24 adoption-to-citizenship program. HANSEN claimed that the Justice "said to [HANSEN]: 'listen, I want
25 to help people; leave it with you. Leave me out of it.' He gave me his cards and he gave me where to
26 look at the library; pull up all of the documents. Most of the paper in California ... he was the one who
27 created all those paper-works, the legal paper-works." HANSEN declined to identify the Justice.
28

1 181. During the interview, HANSEN stated that the "law" permitting AHA's adult-adoption-
2 to-citizenship program is not an America law but, rather, a United Nations law. HANSEN stated that
3 adult adoptees "inherit" the citizenship of adoptive parents. HANSEN stated that he believed that when
4 a person is adopted by a court of in the United States that person receives the same citizenship rights as
5 if that person was born in the United States. HANSEN stated that adoption is only one of the forty-nine
6 benefits AHA sells to customers in its adult-adoption-to-citizenship program.

7 182. During the interview, HANSEN stated that AHA charged customers of its adult-
8 adoption-to-citizenship program between \$7,500 and \$10,000. HANSEN also stated that AHA
9 employed approximately twenty-five or thirty agents, who "fly all over" and are tasked with recruiting
10 new customers of the program. HANSEN stated that AHA agents are paid approximately \$1,500 for
11 each recruited customer.

12 183. During the interview, HANSEN also stated that attorneys had accused him of running a
13 scam at AHA.

14 184. During the interview, HANSEN blamed a recent class action civil lawsuit, alleging fraud,
15 filed by former AHA customers against AHA, HANSEN, and other AHA employees on misconduct
16 committed by **SEVIER**. HANSEN stated that he fired **SEVIER** after **SEVIER** opened a separate
17 agency, AHASA, through which **SEVIER** recruited primarily Mexican customers to participate in a
18 substantially identical adult-adoption-to-citizenship scheme as that offered by AHA. HANSEN stated
19 that **SEVIER** operated AHASA from an AHA office in San Pablo, California. HANSEN stated that
20 **SEVIER** was "taking money without following the rules and procedures of what we're doing [at
21 AHA]." However, HANSEN could not explain any substantive ^{BC 12/13} difference between the services
22 offered by AHA and **SEVIER**'s AHASA, both of which sell customers "memberships" in a program
23 that they promise will result in United States citizenship after an adoption by a United States citizen.

24 185. During the interview, HANSEN stated that the only role USCIS plays in the process of
25 conferring United States citizenship on AHA customers is to "verify" information on the identification
26 "profiles" AHA creates for customers after the adult adoption process. HANSEN explained that
27 customer profiles are collections of records of various official and unofficial documents including
28

1 identification documents, financial documents, and other papers. HANSEN stated that after USCIS
2 completed the verification, the Social Security Administration conferred citizenship on the customers.

3 186. During the interview, HANSEN told law enforcement agents that no one from the United
4 States government had ever told HANSEN that the AHA adult adoption program can lead to United
5 States citizenship.

6 187. During the interview, HANSEN denied that AHA ever filed Form I-130 applications with
7 USCIS on behalf of its customers. Later, when confronted by completed Form I-130 applications filed
8 by AHA – at least one of which bore HANSEN’s signature, which HANSEN identified – HANSEN
9 admitted that AHA had filed Form I-130 applications in the past. HANSEN stated that he filed those
10 forms in error and that “adult adoption has got no form in the Immigration.” HANSEN stated that AHA
11 was operating under a “trial and error” process “to get things right in paperwork.”

12 188. During the interview, HANSEN stated that “quite a few hundred” AHA customers had
13 successfully become United States citizens as a result of AHA’s adult-adoption-to-citizenship program.
14 HANSEN also stated that in the past HANSEN “guaranteed” many prospective AHA customers – who
15 were considering paying to enroll in AHA’s adult-adoption-to-citizenship program – that the adult-
16 adoption-to-citizenship program will result in United States citizenship and that many prior AHA
17 customers had successfully become United States citizens as a result of AHA’s program.

18 189. During the interview, law enforcement agents asked HANSEN for proof of the hundreds
19 of AHA customers who had successfully become United States citizens as a result of AHA’s adult-
20 adoption-to-citizenship program. HANSEN stated that he could not provide such proof because AHA
21 “destroys the file” of AHA customers who successfully become United States citizens. HANSEN also
22 refused to provide law enforcement agents with any names from his memory or other sources of AHA
23 customers who had successfully become United States citizens as a result of AHA’s adult-adoption-to-
24 citizenship program. HANSEN stated that an AHA privacy policy prevented him from disclosing the
25 identities of AHA customers who had successfully become United States citizens as a result of AHA’s
26 adult-adoption-to-citizenship program.

27 190. During the interview, law enforcement agents confronted HANSEN with evidence that
28

1 AHA and HANSEN had only filed two Form I-130 applications to adjust the immigration status of AHA
2 customers and that both of those applications were rejected by USCIS officials. HANSEN admitted that
3 he helped prepare and file those Form I-130 applications and that on one of the applications HANSEN
4 signed in place of the proposed adoptive parent even though HANSEN knew the proposed adoptive
5 parent was dead. Agents also confronted HANSEN with USCIS's explanation that it denied the Form I-
6 130 applications AHA and HANSEN had filed on behalf of AHA customers, in part, because USCIS
7 determined that adult adoptions cannot confer United States citizenship. HANSEN acknowledged that
8 he read that explanation.

9 191. During the interview, HANSEN admitted to law enforcement agents that he had lied to
10 the agents when he stated that hundreds of AHA customers had successfully become United States
11 citizens as a result of AHA's adult-adoption-to-citizenship program. HANSEN also admitted that he
12 had lied in the past to prospective AHA customers when he told them that many prior AHA customers
13 had successfully become United States citizens as a result of AHA's adult-adoption-to-citizenship
14 program. HANSEN admitted that he knew no AHA customers had become a United States citizen as a
15 result of AHA's adult-adoption-to-citizenship program but told prospective AHA customers the
16 opposite.

17 192. During the interview, HANSEN admitted to agents that they were "dead right" that
18 HANSEN knew that "zero" AHA customers had become United States citizens through AHA's adult-
19 adoption-to-citizenship program but, nevertheless, HANSEN told prospective AHA customers the
20 opposite. Law enforcement agents asked HANSEN why he told prospective AHA customers – who
21 were considering paying thousands of dollars to enroll in AHA's adult-adoption-to-citizenship program
22 – that past AHA customers had become United States citizens through the program, if HANSEN knew
23 that the program had never resulted in citizenship for any AHA customer. HANSEN answered, in part:
24 "I still say it's going to work."

25 193. During the interview, HANSEN claimed that only he knew that AHA's adult-adoption-
26 to-citizenship program had never resulted in United States citizenship for any AHA customer.
27 HANSEN claimed that he had not shared that knowledge with SEVIER, WEEKES, and VIOLA
28

1 because of his “belief and the things that sit in my heart; it’s going to work.” HANSEN stated that he
 2 told prospective AHA customers and others that AHA’s adult-adoption-to-citizenship program resulted
 3 in citizenship – even though it never had – “because I want the things to work. Because I know the law
 4 will have to provide for it.” HANSEN stated: “The reason why I say it has worked because the
 5 componentry of what I’ve put together, it must work. That’s why I say it has worked.”

6 **Z. Interview of SEVIER in the Subject Premises**

7 194. On or about December 23, 2015, SEVIER agreed to participate in a voluntary interview
 8 with law enforcement agents in his residence, the **Subject Premises**. Agents advised SEVIER that he
 9 was free to decline to participate in the interview or to end the interview at any time. Agents also recited
 10 the Miranda warnings to SEVIER, who acknowledged those rights before agreeing to answer questions.
 11 Law enforcement agents made an audio recording of the interview with SEVIER.

12 195. During the interview, SEVIER stated, in substance and in part, that he worked for AHA
 13 for four years before he was asked to resign from AHA in November 2015. SEVIER stated that his
 14 final day at AHA was November 23, 2015. SEVIER stated that HANSEN offered SEVIER a job at
 15 AHA’s office in San Pablo, California, which SEVIER declined. However, SEVIER admitted that he
 16 opened and worked at least once per week in the now-closed San Pablo AHA office, and that SEVIER’s
 17 name is on the leases for the space and equipment in that office.

18 196. During the interview, SEVIER stated that he had personally adopted twelve people as
 19 part of the AHA adult-adoption-to-citizenship program. SEVIER stated that he recruited “sixty to one
 20 hundred” applicants into the AHA adult-adoption-to-citizenship program. SEVIER also stated that he
 21 marketed “memberships” in AHA and never marketed adult adoptions. SEVIER stated that part of
 22 AHA membership services included preparing paperwork for adult adoptions and applying for
 23 citizenship.

24 197. During the interview, SEVIER stated that HANSEN instructed every AHA agent to set
 25 up their own separate company, deposit payments from AHA customers into an account for that separate
 26 entity, and use that separate entity’s account to transmit AHA customer payments to AHA. SEVIER
 27 stated that he followed those instructions and set up AHASA.
 28

1 198. During the interview, **SEVIER** admitted that he had referred at least one individual, a
2 pastor from a local church, to AHA to become an AHA agent, and that person had adopted at least two
3 AHA customers.

4 199. During the interview, **SEVIER** stated that a lawyer who was briefly employed by AHA
5 warned **SEVIER** that AHA's adult-adoption-to-citizenship program was a fraud. **SEVIER** stated that
6 the former AHA lawyer told **HANSEN** that it was illegal to list false addresses for AHA customers on
7 adoption applications, and that the lawyer resigned when **HANSEN** ignored her warnings. **SEVIER**
8 also stated that another long-term AHA employee – who “had been there longer than anybody” –
9 warned **SEVIER** “early” that AHA's adult-adoption-to-citizenship program was a fraud. **SEVIER**
10 admitted that he had “doubts” about whether AHA's program was legitimate. **SEVIER** claimed that in
11 November 2015, **SEVIER** told **WEEKES** that **SEVIER** did not think that the adult-adoption-to-
12 citizenship program could ever work.

13 200. During the interview, **SEVIER** stated that instead of heeding the warnings of the former
14 AHA lawyer and others, or his own doubts, **SEVIER** believed **HANSEN**'s reassurances that AHA's
15 adult-adoption-to-citizenship program was legitimate. **SEVIER** stated that he expressed to his wife his
16 doubt about the legitimacy of AHA's program and that maybe he “wanted to believe in something so
17 bad that [he] just believed it.” **SEVIER** stated: “I would give everybody their money back if I had it.”

18 201. During the interview, **SEVIER** retrieved and showed to law enforcement agents a copy
19 of an AHA-sponsored adult adoption court order, which **SEVIER** stated he received in the mail at the
20 **Subject Premises** and that he had stored there since.

21 202. During the interview, **SEVIER** stated that he built AHA's computer server and stated
22 that AHA could not cut off his access to the server. **SEVIER** explained that, since he left AHA, he has
23 continued to monitor AHA's email traffic and other activity by remotely accessing AHA's computer
24 server from the **Subject Premises**. **SEVIER** stated that “whatever they are doing, I get a copy of it,
25 automatic. Cause I want to know what's being said.” **SEVIER** offered proof of his access to and
26 storage of AHA documents and records at the **Subject Premises** by retrieving and showing law
27 enforcement agents a CIBO email from on or about March 30, 2015, which listed the account names and
28

1 passwords for the web servers of AHA and its related entities.

2 203. During the interview, **SEVIER** also stated that although AHA deleted his former AHA
3 email account, **SEVIER** had retained and stored “every email from the day I’ve started working” at
4 AHA. **SEVIER** stated: “I don’t throw anything away.” He also stated: “I don’t delete nothing.”
5 **SEVIER** stated that his AHA emails were stored in his private email account with Gmail.com:
6 jeffseviercell@gmail.com (the **Subject Email Account**). He stated that he kept all or part of four-years
7 of AHA emails in the **Subject Email Account** because he had a bad memory. **SEVIER** also stated that
8 he had used the **Subject Email Account** to email to AHA clients links to television news stories
9 concerning the federal investigation of AHA that aired during the week of December 21, 2015.
10 **SEVIER** also offered agents his consent to permit them to search the **Subject Email Account**, stating:
11 “feel free to go through Gmail.” **SEVIER** stated “I’m not trying to hide anything, even if I’m giving
12 you enough to bury myself.”

13 **AA. AHA Emails Forwarded to Law Enforcement Agents**

14 204. Between on or about January 5, 2016 and on or about January 11, 2016, I have received
15 approximately ten unsolicited forwarded emails from the email address: “admin@ahaus.us.” The
16 forwarded emails contained limited comments from the person who forwarded them but no signature or
17 indication of the identity of the sender. The forwarded emails, among other things, show HANSEN
18 encouraging an AHA adult adoption agent to recruit two new clients as recently as Tuesday, January 5,
19 2016. Based on the incriminating nature of the emails, and based on my investigation of this matter to
20 date, I believe that the emails were likely forwarded by **SEVIER**, as proof of his claims, among other
21 things: (i) to have remote access to AHA’s servers from the **Subject Premises**; (ii) that he is monitoring
22 AHA’s emails from the **Subject Premises**; and (iii) that he is collecting and storing AHA documents
23 and records at the **Subject Premises**.

24 **VI. RELEVANT EXPERIENCE AND TRAINING**

25 205. Based on the evidence gathered in this investigation to date, as well my experience,
26 knowledge, and training, and that of other agents with whom I have discussed this investigation, I am
27 aware that persons engaged in financial fraud schemes often retain records of their transactions in their
28

1 personal residences, business premises, or other places under their control. These records often include
2 evidence of deposits, payments, and receipts for expenditures by cash and check, bank records, and
3 other financial documents, and may be in the form of written notes and correspondence, receipts,
4 negotiated instruments, contracts, bank statements, and other records. Such records are also often stored
5 in digital media.

6 206. Based on my experience, knowledge, and training, and that of other agents with whom I
7 have discussed this investigation, I am aware that there are many reasons why criminal offenders might
8 maintain evidence for long periods of time. First, to outsiders the evidence may seem innocuous (e.g.
9 financial, credit card and banking documents, travel documents, receipts, client lists, documents
10 reflecting acquisition or sale of assets, personal calendars, telephone and address directories,
11 checkbooks, photographs, utility records, ownership records, letters and notes, tax returns and financial
12 records, escrow files, telephone and pager bills, keys to safe deposit boxes, packaging materials,
13 computer hardware and software). However, to law enforcement agents, such items may have
14 significance and relevance when considered in light of other evidence. Second, the individual may no
15 longer realize that s/he still possesses the evidence or may believe law enforcement agents could not
16 obtain a search warrant to seize the evidence. Third, the individual may operate under the belief that
17 s/he has deleted, hidden, or destroyed computer-related evidence, when, in fact, that evidence may be
18 retrievable by a trained forensic computer expert.

19 207. Based on the evidence gathered in this investigation to date, as well my experience,
20 knowledge, and training, and that of other agents with whom I have discussed this investigation, I am
21 aware that persons engaged in financial fraud schemes often maintain records of their transactions for
22 long periods of time, particularly when they are engaged in ongoing, long-term criminal conduct. Based
23 on my experience, knowledge, and training, and that of other agents with whom I have discussed this
24 investigation, and my review of United States v. Greany, 929 F2d 523, 525 (9th Cir. 1991), I am aware
25 that the Ninth Circuit and other courts have held that, where there is ongoing criminal business or where
26 the evidence is of a nature that would be kept long after the criminal business has ceased, the passage of
27 long periods of time will not make the evidence supporting the issuance of a search warrant stale.
28

1 208. Based on my experience, knowledge, and training, and that of other agents with whom I
2 have discussed this investigation, I am aware that, individuals involved in financial fraud schemes, along
3 with their conspirators and accomplices, often use mobile cell phones, laptop computers, electronic
4 tablets and other electronic devices to communicate with one another regarding their fraud and theft
5 activities, by voice calls, text messages, and electronic mail. I know that such persons who use such
6 devices commonly exchange real time information about fraudulent activity and other information
7 regarding execution of fraudulent transactions. Such information can be found stored in the text, voice,
8 and email messages on such devices or in other electronic data storage within such devices. Such
9 persons also use electronic devices to link with the internet to obtain addresses, maps, and other data
10 about the scheme in which they are engaged and their victims. Such electronic devices can also be used
11 to remotely make fraudulent mobile banking transaction, including deposits and other financial
12 transactions.

13 209. Based on my experience, knowledge, and training, and that of other agents with whom I
14 have discussed this investigation, I am aware that the complete contents of text messages and emails
15 may be important to establishing the actual user who has dominion and control of a particular phone or
16 computer at a given time. Cell phones may be subscribed to under false names with little to no
17 verification by the service provider. Cell phones and computers may also be used by multiple people.
18 Given the ease with which such items may be obtained and used, and the rarity with which law
19 enforcement has eyewitness testimony about a defendant's use of a particular cell phone or device that
20 was used to send a particular text or email message, investigators often have to rely on circumstantial
21 evidence to show that an individual was the actual user of a particular cell phone or device.

22 210. Based on my experience, knowledge, and training, and that of other agents with whom I
23 have discussed this investigation, I am aware that, often, by piecing together information contained in
24 the contents of the device (cell phone or computer or storage device) an investigator can establish the
25 identity of the actual user. Often, those pieces will come from a time period before the device was used
26 in criminal activity. Limiting the scope of the search for information showing the actual user of the
27 device would, in some instances, prevent the government from identifying the user of the device and, in
28

1 other instances, prevent a defendant from suggesting that someone else was responsible. Therefore, the
 2 entire content of an electronic communication device often provides important evidence regarding the
 3 actual user's dominion and control of the device. Moreover, to comply with its obligations under Brady
 4 v. Maryland, 373 U.S. 83 (1963), the government must be allowed to seize and review the contents of
 5 communications of electronic storage devices, including text and email messages sent or received by the
 6 subject device to determine whether other individuals had access to the device. If the government were
 7 constrained to review only a small portion of communications on the device, that small subsection might
 8 give a misleading impression that only a single user had access to the devices.

9 211. Based upon my training and experience, my conversations with other law enforcement
 10 personnel assisting in this case, and my investigation in this case, I am aware that criminals discussing
 11 their criminal activity via electronic communication devices (computer email and cell phone text
 12 messaging, among other means) may use slang, short forms (abbreviated words or phrases such as "lol"
 13 to express "laugh out loud"), or code words (which require entire strings or series of text message
 14 conversations to determine their true meaning) when discussing their crimes. They can also discuss
 15 aspects of the crime without specifically mentioning the crime involved. It is even possible to use
 16 pictures, images, and emoticons (images used to express a concept or idea such as a happy face inserted
 17 into the content of a text message or the manipulation and combination of keys on the computer
 18 keyboard to convey an idea, such as the use of a colon and paren :) to convey a smile or agreement) to
 19 discuss matters. "Keyword searches" or other automated methods of review of the text messages sent to
 20 and from the subject device would not account for any of these possibilities, so actual review of the text
 21 and email messages by law enforcement personnel with information regarding the identified criminal
 22 activity is necessary to find all relevant evidence.

23 **VII. SEARCH AND SEIZURE OF COMPUTER/ELECTRONIC/DIGITAL DATA**

24 **A. Technical Terms**

25 212. Based on my training and experience, I use the following technical terms to convey the
 26 following meanings:

- 27 a) IP Address: The Internet Protocol address (or simply "IP address") is a unique numeric
 28 address used by computers on the Internet. An IP address looks like a series of four

1 numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every
2 computer attached to the Internet must be assigned an IP address so that Internet traffic
3 sent from and directed to that computer may be directed properly from its source to its
4 destination. Most Internet service providers control a range of IP addresses. Some
5 computers have static—that is, long-term—IP addresses, while other computers have
6 dynamic—that is, frequently changed—IP addresses.

- 7 b) Internet: The Internet is a global network of computers and other electronic devices that
8 communicate with each other. Due to the structure of the Internet, connections between
9 devices on the Internet often cross state and international borders, even when the devices
10 communicating with each other are in the same state.
- 11 c) Storage medium: A storage medium is any physical object upon which computer data can
12 be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-
13 ROMs, and other magnetic or optical media.

14 **B. Background Concerning Email**

15 213. In my training and experience, I have learned that Google, Inc. provides a variety of on-
16 line services, including electronic mail (“email”) access, to the public. Google, Inc. allows subscribers
17 to obtain email accounts at the domain name gmail.com, like the email account listed in Attachment A1.
18 Subscribers obtain an account by registering with Google, Inc. During the registration process, Google,
19 Inc. asks subscribers to provide basic personal information. Therefore, the computers of Google, Inc.
20 are likely to contain stored electronic communications (including retrieved and unretrieved email for
21 Google, Inc. subscribers) and information concerning subscribers and their use of Google, Inc. services,
22 such as account access information, email transaction information, and account application information.
23 In my training and experience, such information may constitute evidence of the crimes under
24 investigation because the information can be used to identify the account’s user or users.

25 214. A Google, Inc. subscriber can also store with the provider files in addition to emails, such
26 as address books, contact or buddy lists, calendar data, pictures (other than ones attached to emails), and
27 other files, on servers maintained and/or owned by Google, Inc. In my training and experience,
28 evidence of who was using an email account may be found in address books, contact or buddy lists,
email in the account, and attachments to emails, including pictures and files.

1 215. In my training and experience, email providers generally ask their subscribers to provide
2 certain personal identifying information when registering for an email account. Such information can
3 include the subscriber's full name, physical address, telephone numbers and other identifiers, alternative
4 email addresses, and, for paying subscribers, means and source of payment (including any credit or bank
5 account number). In my training and experience, such information may constitute evidence of the
6 crimes under investigation because the information can be used to identify the account's user or users.
7 Based on my training and my experience, I know that even if subscribers insert false information to
8 conceal their identity, I know that this information often provide clues to their identity, location or illicit
9 activities.

10 216. In my training and experience, email providers typically retain certain transactional
11 information about the creation and use of each account on their systems. This information can include
12 the date on which the account was created, the length of service, records of log-in (i.e., session) times
13 and durations, the types of service utilized, the status of the account (including whether the account is
14 inactive or closed), the methods used to connect to the account (such as logging into the account via the
15 provider's website), and other log files that reflect usage of the account. In addition, email providers
16 often have records of the Internet Protocol address ("IP address") used to register the account and the IP
17 addresses associated with particular logins to the account. Because every device that connects to the
18 Internet must use an IP address, IP address information can help to identify which computers or other
19 devices were used to access the email account.

20 217. In my training and experience, in some cases, email account users will communicate
21 directly with an email service provider about issues relating to the account, such as technical problems,
22 billing inquiries, or complaints from other users. Email providers typically retain records about such
23 communications, including records of contacts between the user and the provider's support services, as
24 well records of any actions taken by the provider or user as a result of the communications. In my
25 training and experience, such information may constitute evidence of the crimes under investigation
26 because the information can be used to identify the account's user or users.

27 218. As explained herein, information stored in connection with an email account may provide
28

1 crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under
 2 investigation, thus enabling the United States to establish and prove each element or alternatively, to
 3 exclude the innocent from further suspicion. In my training and experience, the information stored in
 4 connection with an email account can indicate who has used or controlled the account. This “user
 5 attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search
 6 warrant at a residence. For example, email communications, contacts lists, and images sent (and the
 7 data associated with the foregoing, such as date and time) may indicate who used or controlled the
 8 account at a relevant time. Further, information maintained by the email provider can show how and
 9 when the account was accessed or used. For example, as described below, email providers typically log
 10 the Internet Protocol (IP) addresses from which users access the email account along with the time and
 11 date. By determining the physical location associated with the logged IP addresses, investigators can
 12 understand the chronological and geographic context of the email account access and use relating to the
 13 crime under investigation. This geographic and timeline information may tend to either inculcate or
 14 exculpate the account owner. Additionally, information stored at the user’s account may further indicate
 15 the geographic location of the account user at a particular time (e.g., location information integrated into
 16 an image or video sent via email). Last, stored electronic data may provide relevant insight into the
 17 email account owner’s state of mind as it relates to the offense under investigation. For example,
 18 information in the email account may indicate the owner’s motive and intent to commit a crime (e.g.,
 19 communications relating to the crime), or consciousness of guilt (e.g., deleting communications in an
 20 effort to conceal them from law enforcement).

21 **C. Computers, Electronic Storage, and Forensic Analysis**

22 219. As described above and in Attachment B1, this application seeks permission to search for
 23 records that might be found on the **Subject Premises**, in whatever form they are found. One form in
 24 which the records might be found is data stored on a computer’s hard drive or other storage media.
 25 Thus, the warrant applied for would authorize the seizure of electronic storage media or, potentially, the
 26 copying of electronically stored information, all under Rule 41(e)(2)(B).

27 220. *Probable cause.* I submit that if a computer or storage medium is found on the **Subject**
 28

1 **Premises**, there is probable cause to believe those records will be stored on that computer or storage
2 medium, for at least the following reasons:

- 3 a. Based on my knowledge, training, and experience, I know that computer files or
4 remnants of such files can be recovered months or even years after they have been
5 downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files
6 downloaded to a storage medium can be stored for years at little or no cost. Even when
7 files have been deleted, they can be recovered months or years later using forensic tools.
8 This is so because when a person “deletes” a file on a computer, the data contained in the
9 file does not actually disappear; rather, that data remains on the storage medium until it is
10 overwritten by new data.
11
- 12 b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack
13 space—that is, in space on the storage medium that is not currently being used by an
14 active file—for long periods of time before they are overwritten. In addition, a
15 computer’s operating system may also keep a record of deleted data in a “swap” or
16 “recovery” file.
- 17 c. Wholly apart from user-generated files, computer storage media—in particular,
18 computers’ internal hard drives—contain electronic evidence of how a computer has been
19 used, what it has been used for, and who has used it. To give a few examples, this
20 forensic evidence can take the form of operating system configurations, artifacts from
21 operating system or application operation, file system data structures, and virtual memory
22 “swap” or paging files. Computer users typically do not erase or delete this evidence,
23 because special software is typically required for that task. However, it is technically
24 possible to delete this information.
- 25 d. Similarly, files that have been viewed via the Internet are sometimes automatically
26 downloaded into a temporary Internet directory or “cache.”
27
28

- 1 e. Based on actual inspection of other evidence related to this investigation, I am aware that
2 computer equipment, accessible remotely from the **Subject Premises**, was used to
3 generate, store, and print documents used in the adult-adoption-to-citizenship scheme.
4 There is reason to believe that there is a computer system currently located on the
5 **Subject Premises** in which similar evidence is stored.
6

7 221. *Forensic evidence.* As further described in Attachment B1, this application seeks
8 permission to locate not only computer files that might serve as direct evidence of the crimes described
9 on the warrant, but also for forensic electronic evidence that establishes how computers were used, the
10 purpose of their use, who used them, and when. There is probable cause to believe that this forensic
11 electronic evidence will be on any storage medium in the **Subject Premises** because:

- 12 a. Data on the storage medium can provide evidence of a file that was once on the storage
13 medium but has since been deleted or edited, or of a deleted portion of a file (such as a
14 paragraph that has been deleted from a word processing file). Virtual memory paging
15 systems can leave traces of information on the storage medium that show what tasks and
16 processes were recently active. Web browsers, e-mail programs, and chat programs store
17 configuration information on the storage medium that can reveal information such as
18 online nicknames and passwords. Operating systems can record additional information,
19 such as the attachment of peripherals, the attachment of USB flash storage devices or
20 other external storage media, and the times the computer was in use. Computer file
21 systems can record information about the dates files were created and the sequence in
22 which they were created, although this information can later be falsified.
23
24 b. As explained herein, information stored within a computer and other electronic storage
25 media may provide crucial evidence of the “who, what, why, when, where, and how” of
26 the criminal conduct under investigation, thus enabling the United States to establish and
27 prove each element or alternatively, to exclude the innocent from further suspicion. In
28 my training and experience, information stored within a computer or storage media (e.g.,

1 registry information, communications, images and movies, transactional information,
2 records of session times and durations, internet history, and anti-virus, spyware, and
3 malware detection programs) can indicate who has used or controlled the computer or
4 storage media. This “user attribution” evidence is analogous to the search for “indicia of
5 occupancy” while executing a search warrant at a residence. The existence or absence of
6 anti-virus, spyware, and malware detection programs may indicate whether the computer
7 was remotely accessed, thus inculcating or exculpating the computer owner. Further,
8 computer and storage media activity can indicate how and when the computer or storage
9 media was accessed or used. For example, as described herein, computers typically
10 contains information that log: computer user account session times and durations,
11 computer activity associated with user accounts, electronic storage media that connected
12 with the computer, and the IP addresses through which the computer accessed networks
13 and the internet. Such information allows investigators to understand the chronological
14 context of computer or electronic storage media access, use, and events relating to the
15 crime under investigation. Additionally, some information stored within a computer or
16 electronic storage media may provide crucial evidence relating to the physical location of
17 other evidence and the suspect. For example, images stored on a computer may both
18 show a particular location and have geolocation information incorporated into its file
19 data. Such file data typically also contains information indicating when the file or image
20 was created. The existence of such image files, along with external device connection
21 logs, may also indicate the presence of additional electronic storage media (e.g., a digital
22 camera or cellular phone with an incorporated camera). The geographic and timeline
23 information described herein may either inculcate or exculpate the computer user. Last,
24 information stored within a computer may provide relevant insight into the computer
25 user’s state of mind as it relates to the offense under investigation. For example,
26 information within the computer may indicate the owner’s motive and intent to commit a
27 crime (e.g., internet searches indicating criminal planning), or consciousness of guilt
28

1 (e.g., running a "wiping" program to destroy evidence on the computer or password
2 protecting/encrypting such evidence in an effort to conceal it from law enforcement).

- 3 c. A person with appropriate familiarity with how a computer works can, after examining
4 this forensic evidence in its proper context, draw conclusions about how computers were
5 used, the purpose of their use, who used them, and when.
- 6
- 7 d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of
8 forensic evidence on a storage medium that are necessary to draw an accurate conclusion
9 is a dynamic process. While it is possible to specify in advance the records to be sought,
10 computer evidence is not always data that can be merely reviewed by a review team and
11 passed along to investigators. Whether data stored on a computer is evidence may
12 depend on other information stored on the computer and the application of knowledge
13 about how a computer behaves. Therefore, contextual information necessary to
14 understand other evidence also falls within the scope of the warrant.
- 15 e. Further, in finding evidence of how a computer was used, the purpose of its use, who
16 used it, and when, sometimes it is necessary to establish that a particular thing is not
17 present on a storage medium. For example, the presence or absence of counter-forensic
18 programs or anti-virus programs (and associated data) may be relevant to establishing the
19 user's intent.
- 20
- 21 f. I know that when an individual uses a computer to remotely access another electronic
22 device, the individual's computer will generally serve both as an instrumentality for
23 committing the crime, and also as a storage medium for evidence of the crime. The
24 computer is an instrumentality of the crime because it is used as a means of committing
25 the criminal offense. The computer is also likely to be a storage medium for evidence of
26 crime. From my training and experience, I believe that a computer used to commit a
27 crime of this type may contain: data that is evidence of how the computer was used; data
28 that was sent or received; notes as to how the criminal conduct was achieved; records of

1 Internet discussions about the crime; and other records that indicate the nature of the
2 offense.

3
4 222. *Necessity of seizing or copying entire computers or storage media.* In most cases, a
5 thorough search of a premises for information that might be stored on storage media often requires the
6 seizure of the physical storage media and later off-site review consistent with the warrant. In lieu of
7 removing storage media from the premises, it is sometimes possible to make an image copy of storage
8 media. Generally speaking, imaging is the taking of a complete electronic picture of the computer's
9 data, including all hidden sectors and deleted files. Either seizure or imaging is often necessary to
10 ensure the accuracy and completeness of data recorded on the storage media, and to prevent the loss of
11 the data either from accidental or intentional destruction. This is true because of the following:

- 12 a. The time required for an examination. As noted above, not all evidence takes the form of
13 documents and files that can be easily viewed on site. Analyzing evidence of how a
14 computer has been used, what it has been used for, and who has used it requires
15 considerable time, and taking that much time on premises could be unreasonable. As
16 explained above, because the warrant calls for forensic electronic evidence, it is
17 exceedingly likely that it will be necessary to thoroughly examine storage media to obtain
18 evidence. Storage media can store a large volume of information. Reviewing that
19 information for things described in the warrant can take weeks or months, depending on
20 the volume of data stored, and would be impractical and invasive to attempt on-site.
- 21 b. Technical requirements. Computers can be configured in several different ways,
22 featuring a variety of different operating systems, application software, and
23 configurations. Therefore, searching them sometimes requires tools or knowledge that
24 might not be present on the search site. The vast array of computer hardware and
25 software available makes it difficult to know before a search what tools or knowledge
26 will be required to analyze the system and its data on the **Subject Premises**. However,
27
28

1 taking the storage media off-site and reviewing it in a controlled environment will allow
2 its examination with the proper tools and knowledge.

- 3
4 c. Variety of forms of electronic media. Records sought under this warrant could be stored
5 in a variety of storage media formats that may require off-site reviewing with specialized
6 forensic tools.

7 223. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the
8 warrant I am applying for would permit seizing, imaging, or otherwise copying storage media that
9 reasonably appear to contain some or all of the evidence described in the warrant, and would authorize a
10 later review of the media or information consistent with the warrant. The later review may require
11 techniques, including but not limited to computer-assisted scans of the entire medium, that might expose
12 many parts of a hard drive to human inspection in order to determine whether it is evidence described by
13 the warrant.

14 224. Additionally, I have spoken with FBI Information Technology Specialist ("ITS") and
15 Computer Forensic Examiner ("FE") Alan Russell Schmidt, who has been a Forensic Examiner since
16 2006. FE Schmidt is specially trained in computer search and seizure and is certified by the FBI as a
17 member of the FBI Computer Analysis Response Team ("CART"). FE Schmidt has been a member of
18 CART since 2005 and has conducted numerous searches and seizures involving computers and
19 computer data. FE Schmidt related information to me and/or confirmed information for me as noted
20 below.

21 225. Based upon my training and experience, and information related to me by agents and
22 others involved in the forensic examination of computers and digital devices including FE Schmidt, I
23 know that data in digital form can be stored on a variety of systems, storage devices, or media, including
24 hard disk drives, floppy disks, compact disks, magnetic tapes, flash drives, and memory chips. Some of
25 these devices can be smaller than a thumbnail and can take several forms, including thumb drives,
26 secure digital media used in phones and cameras, personal music devices, and similar items.

27 226. Based upon my training and experience, and information related to me by agents and
28

1 others involved in the forensic examination of computers and digital devices, including FE Schmidt, I
2 know that computers and digital devices are often used to store information, very much the same way
3 paper, ledgers, files and file cabinets are used to store information. I know that it is common today for
4 businesses to utilize computers to conduct their business and to store information related thereto. I also
5 know that it is common for individuals to have personal computers and to use these computers to
6 conduct their personal affairs, their business affairs, and to store information related thereto. I know
7 based on my training and experience, and the training and experience of other agents with whom I have
8 consulted, including prior investigations specifically related to the investigation of consumer fraud, that
9 subjects who are engaged in such fraud commonly store information related to their activities on
10 computers and digital devices.

11 227. Because several people share the **Subject Premises** as a residence, it is possible that the
12 **Subject Premises** will contain storage media that are predominantly used, and perhaps owned, by
13 persons who are not suspected of a crime. If it is nonetheless determined that that it is possible that the
14 things described in this warrant could be found on any of those computers or storage media, the warrant
15 applied for would permit the seizure and review of those items as well.

16 228. This warrant seeks authority to seize contextual data, that is, evidence of how a digital
17 device has been used, what it has been used for and who has used it. It can be very important in criminal
18 cases to seek "attribution" data so that an event or communication can be associated with a person.
19 Based upon my training and experience, and information related to me by agents and others involved in
20 the forensic examination of computers and digital devices including FE Schmidt, this authority is sought
21 for a number of reasons:

- 22 a. In some instances, the computer "writes" to storage media without the specific
23 knowledge or permission of the user. Generally, data or files that have been received
24 via the Internet are automatically downloaded into a temporary Internet directory or
25 cache. The browser typically maintains a fixed amount of hard drive space devoted
26 to such data or files, and the files are only overwritten as they are replaced with more
27 recently viewed Internet pages. Thus, the ability to retrieve artifacts of electronic
28 activity from a hard drive depends less on when the file was downloaded or viewed
than on a particular user's operating system, storage capacity, and computer usage.

1 Logs of access to websites, file management/transfer programs, firewall permissions,
2 and other data assist the examiner and investigators in creating a "picture" of what the
3 computer was doing and how it was being used during the relevant time in question.
4 Given the interrelationships of the data to various parts of the computer's operation,
5 this information cannot be easily segregated.

6 b. Digital data on the hard drive that is not currently associated with any file may reveal
7 evidence of a file that was once on the hard drive but has since been deleted or edited,
8 or it could reveal a deleted portion of a file (such as a paragraph that has been deleted
9 from a word processing file). Virtual memory paging systems can leave digital data
10 on the hard drive that show what tasks and processes on the computer were recently
11 used. Web browsers, email programs, and chat programs store configuration data on
12 the hard drive that can reveal information such as online nicknames and passwords.
13 Operating systems can record additional data, such as the attachment of peripherals,
14 the attachment of USB flash storage devices, and times the computer was in use.
15 Computer file systems can record data about the dates files were created and the
16 sequence in which they were created. This data can be evidence of a crime, can
17 indicate the identity of the user of the digital device, or can point toward the existence
18 of evidence in other locations (or on other devices).

19 c. Further, evidence of how a digital device has been used, what it has been used for,
20 and who has used it, may be learned from the absence of particular data on a digital
21 device. Specifically, the lack of computer security software, virus protection,
22 malicious software, evidence of remote control by another computer system, or other
23 programs or software may assist in identifying the user indirectly and may provide
24 evidence excluding other causes for the presence or absence of the items sought by
25 this application. Additionally, since computer drives may store artifacts from the
26 installation of software that is no longer active, evidence of the historical presence of
27 the kind of software and data described may have special significance in establishing
28 timelines of usage, confirming the identification of certain users, establishing a point
of reference for usage and, in some cases, assisting in the identification of certain
users. This data can be evidence of a crime, can indicate the identity of the user of
the digital device, or can point toward the existence of evidence in other locations.
Evidence of the absence of particular data on the drive is not generally capable of

being segregated from the rest of the data on the drive.

D. Search Procedure

229. In searching for data capable of being read, stored, or interpreted by a computer or storage device, law enforcement personnel executing the search warrant will employ the following procedure:

- a. The digital device or mirror image will be transported to an appropriate law enforcement laboratory for review.
- b. Law enforcement personnel (potentially including, but not necessarily limited to, computer personnel) will examine the digital device to determine if it contains any data that falls within the list of items to be seized as set forth in the warrant and in Attachments B1.
- c. Law enforcement personnel will use procedures designed to identify items to be seized under the warrant. These procedures may include, without limitation, the use of a "hash value" library to exclude normal operating system files that do not need to be searched. In addition, law enforcement personnel may search for and attempt to recover deleted, hidden, or encrypted data to determine whether the data falls within the list of items to be seized under the warrant.
- d. If the original digital device was seized, law enforcement personnel will perform an initial search of the original digital device within a reasonable amount of time not to exceed 120 days from the date of execution of the warrant. If, after conducting the initial search, law enforcement personnel determine that an original digital device contains any data falling within the list of items to be seized pursuant to this warrant, the government will retain the original digital device to, among other things, litigate the admissibility or authenticity of the seized items at trial, ensure the integrity of the copies, ensure the adequacy of chain of custody, and resolve any issues that potentially might be raised regarding changed conditions of the evidence. If the government needs additional time to determine whether an original digital device contains any data falling within the list of items to be seized pursuant to this warrant, it may seek an extension of the time period from the Court within the original 120-day period from the date of execution of the warrant.
- e. If an original digital device does not contain any data falling within the list of items to

1 be seized pursuant to this warrant, the government will: return that original digital
 2 device to its owner within a reasonable period of time if it can be lawfully possessed,
 3 seal any image previously made of the device, and not review the sealed image absent
 4 further authorization from the Court.

5 **E. Data to be Seized**

6 230. Based upon my training and experience, and information related to me by agents and
 7 others involved in the forensic examination of computers and digital devices, I know that, in order to
 8 search for data that is capable of being read or interpreted by a computer, law enforcement personnel
 9 will need to seize, image, copy, and/or search the following items, subject to the procedures set forth
 10 herein:

- 11 a. Any computer equipment or digital devices that are capable of being used to commit
 12 or further the crimes outlined above, or to create, access, or store evidence,
 13 contraband, fruits, or instrumentalities of such crimes, as set forth in Attachment B1;
- 14 b. Any computer equipment or digital devices used to facilitate the transmission,
 15 creation, display, encoding, or storage of data, including word processing equipment,
 16 modems, docking stations, monitors, printers, plotters, encryption devices, and optical
 17 scanners that are capable of being used to commit or further the crimes outlined
 18 above, or to create, access, process, or store evidence, contraband, fruits, or
 19 instrumentalities of such crimes, as set forth in Attachment B1;
- 20 c. Any magnetic, electronic, or optical storage device capable of storing data, such as
 21 floppy disks, hard disks, tapes, CD-ROMs, CD-Rs, CD-RWs, DVDs, optical disks,
 22 printer or memory buffers, smart cards, PC cards, memory calculators, electronic
 23 dialers, electronic notebooks, personal digital assistants, and cell phones capable of
 24 being used to commit or further the crimes outlined above, or to create, access, or
 25 store evidence, contraband, fruits, or instrumentalities of such crimes, as set forth in
 26 Attachment B1;
- 27 d. Any documentation, operating logs, and reference manuals regarding the operation of
 28 the computer equipment, storage devices, or software as set forth in Attachment B1;
- e. Any applications, utility programs, compilers, interpreters, and other software used to
 facilitate direct or indirect communication with the computer hardware, storage
 devices, or data to be searched as set forth in Attachment B1;

- f. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the computer equipment, storage devices, or data as set forth in Attachment B1;
- g. Any passwords, password files, test keys, encryption codes, or other information necessary to access the computer equipment, storage devices, or data as set forth in Attachment B1; and
- h. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any computer or digital device, that show the actual user(s) of the computers or digital devices during any time period in which the device was used to commit the crimes referenced above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the computer; MAC IDs and/or Internet Protocol addresses used by the computer; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device) as set forth in Attachment B1;
- i. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any computer or digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the computer or digital device as set forth in Attachment B1;
- j. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any computer or digital device, that show contextual information necessary to understand the evidence, contraband, fruits, or instrumentalities as set forth in Attachment B1;

F. Retention of Image

231. The government will retain a forensic image of each digital device subjected to analysis for a number of reasons, including proving the authenticity of evidence to be used at trial; responding to any potential questions regarding the corruption of data; establishing the chain of custody of data; refuting any potential claims of fabrication, tampering, or destruction with/of data; and addressing

1 potential exculpatory evidence claims where, for example, a defendant claims that the government
2 avoided its obligations by destroying data or returning it to a third party.

3 **G. Inventory and Return**

4 232. With respect to the seizure of electronic storage media or the seizure or imaging of
5 electronically stored information, the search warrant return to the Court will describe the physical
6 storage media that were seized or imaged.

7 **VIII. CONCLUSION**

8 233. Based on my training, experience, and discussions with other law enforcement agents, as
9 well as the evidence set forth in this Affidavit, I respectfully submit that probable cause exists to believe
10 that AHA, its subsidiaries, and its associated members are engaged in an ongoing scheme to defraud
11 undocumented immigrants as set forth herein, and that such scheme has generated over \$500,000 in
12 losses in the last three years. Further, I respectfully assert that there is probable cause to believe that
13 documents, records, and other items more fully described in Attachments B1 and B2 will be found at the
14 places defined in Attachments A1 and A2. Because the warrant to search the Subject Email Account
15 described in Attachment A1 for will be served on Google, Inc., who will then compile the requested
16 records at a time convenient to it, reasonable cause exists to permit the execution of the requested
17 warrant at any time in the day or night.


18 234. Therefore, I respectfully request that the Court issue search warrants for evidence,
19 contraband, fruits, and instrumentalities of violations of the Specified Federal Offenses.


20 **IX. REQUEST FOR SEALING**

21 235. It is respectfully requested that this Court issue an order sealing, until further order of the
22 Court, all papers submitted in support of this application, including the application and search warrant. I
23 believe that sealing this document is necessary because the items and information to be seized are
24 relevant to an ongoing investigation into the criminal organizations as not all of the targets of this
25 investigation will be searched at this time. Based upon my training and experience, I have learned that
26 online criminals actively search for criminal affidavits and search warrants via the Internet, and
27 disseminate them to other online criminals as they deem appropriate, i.e., post them publicly online
28

1 through the carding forums. Premature disclosure of the contents of this affidavit and related documents
2 may have a significant and negative impact on the continuing investigation and may severely jeopardize
3 its effectiveness. Accordingly, I request that the Court issue an order that the search warrant, this
4 Affidavit in support of the application for the search warrant, and the application for search warrant be
5 filed under seal until further court order.
6


7 I swear under penalty and perjury that the foregoing information is true and correct to the best of
8 my knowledge, information, and belief.
9

10 
11 Brady Cowan, Special Agent
Federal Bureau of Investigation

12 Approved as to form.
13 

14 Andre M. Espinosa
15 Assistant United States Attorney
16

17 Subscribed and sworn to before me this 13th day of January, 2016.
18

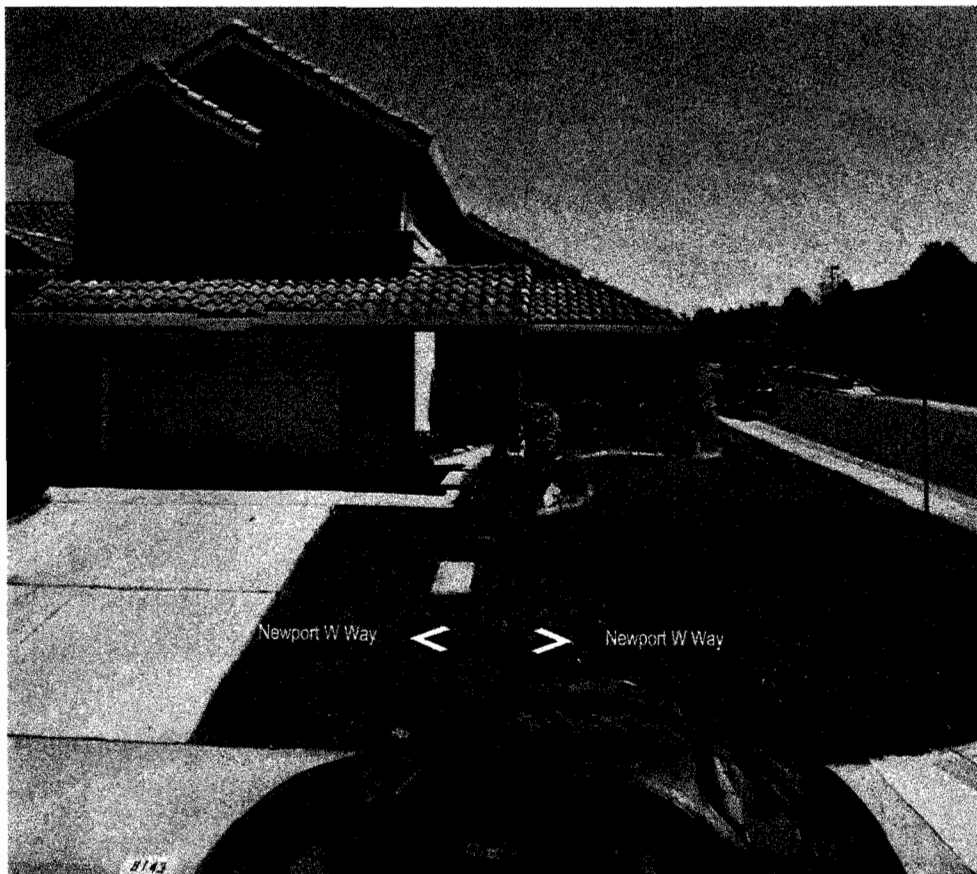
19 
20 Honorable Edmund F. Brennan
21 United States Magistrate Judge
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Attachment A1 (Subject Premises)

LOCATION TO BE SEARCHED: The residence is located at 9143 Newport West Way, Elk Grove, California, 95758.

Subject Premises is a two story home, located on the corner of Newport West Way and Tegan Road in Elk Grove, California. The home is located east of Newport West Way and north of Tegan Road. The structure is predominately beige in color. The tiled roof is light brown in color. There is a white two-door garage facing west. The primary entrance is a white door, which sits to the south of the garage and also faces west. The white door is offset to the east of the garage. The numbers "9143" are arranged vertically on the wall just south of the garage door. The numbers "9143" are also painted vertically in black font on a white background on the sidewalk on the southwest corner of the driveway. There is a brown wooden fence enclosing the backyard, which extends from the southeast and northeast corners of the residence to the eastern edge of the backyard. The garage has an alternate entrance in the form of a beige door with a window on the northwest edge of the residence.

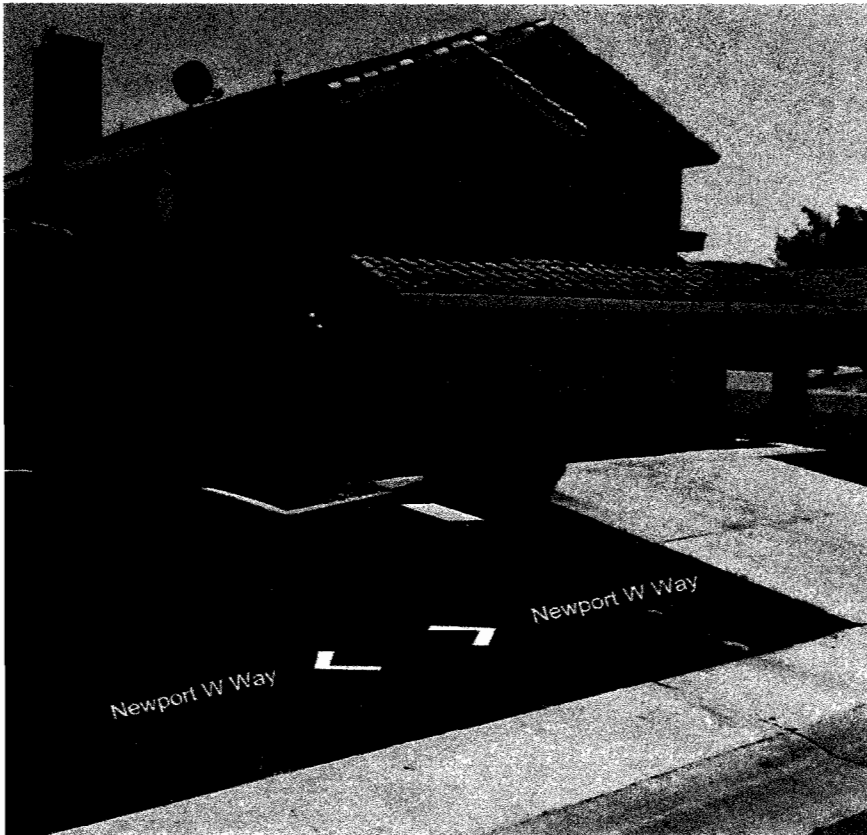
Subject Premises, View from the west:



Subject Premises, View from the south:



Subject Premises, Garage door alternate entrance:



Attachment B1

ITEMS TO BE SEIZED: The items to be seized are evidence, contraband, fruits or instrumentalities of violations of the Specified Federal Offenses: (i) Title 18 United States Code, § 1341 (Mail Fraud); (ii) Title 18 United States Code, § 1343 (Wire Fraud); (iii) Title 18 United States Code, § 1349 (Conspiracy); and (iv) Title 8 United States Code §§ 1324(a)(1)(A)(iv) and (B)(i) (Encouraging and Inducing Illegal Immigration for Private Financial Gain), namely:

- a. Indicia of residency or control of the property subject to search;
- b. Financial records, including statements, correspondence, receipts, or other documentation from any financial institution;
- c. Any records relating to adult adoption applications or immigration services;
- d. Any corporate or other business document concerning AMERICANS HELPING AMERICA (“AHA”), NATIVE HAWAIIANS AND PACIFIC ISLANDERS (“NHPI”), and COMMUNITY INDEPENDENT BUSINESS OWNERS (“CIBO”), or other related entities engaged in the provision immigration advice or services, or their employees;
- e. Any applications for or awards of local, state, or federal grants or other government funding concerning AHA, NHPI, CIBO, or other related entities engaged in the provision immigration advice or services;
- f. Any records related to the sale or issuance of stocks and securities concerning AHA, NHPI, CIBO, or other related entities engaged in the provision immigration advice or services, or their employees;
- g. Any lists containing telephone, address, or e-mail contacts of customers of AHA, NHPI, CIBO, or other related entities engaged in the provision immigration advice or services, or their employees;

- h. Any documents associated with subscription or use of an offsite mailbox by AHA, NHPI, CIBO, or other related entities engaged in the provision immigration advice or services, or their employees;
- i. Any records pertaining to internet domain registration by AHA, NHPI, CIBO, or other related entities engaged in the provision immigration advice or services, or their employees;
- j. Electronic books, records, receipts, notes, ledgers, pictures, video, and communications (emails and text messaging) concerning the sale of securities; efforts to secure grants or local, state, or federal funding; or immigration advice, immigration services, and immigration-related transactions by AHA, NHPI, CIBO, or other related entities, or their employees;
- k. Lists of names, dates of birth, Social Security numbers, employer identification numbers, bank account numbers, and other identifying information for any individual or business engaged in transactions with AHA, NHPI, CIBO, or other entities engaged in the provision immigration advice or services, or their employees;
- l. Bank statements, deposit and withdrawal slips, check registers, cancelled checks, ATM receipts, ATM/credit cards, prepaid debit cards, or other bank records concerning AHA, NHPI, CIBO, or other entities engaged in the provision immigration advice or services, or their employees;
- m. Any correspondence to or from AHA, NHPI, CIBO, or other entities engaged in the provision immigration advice or services, or their employees, including but not limited to HELAMAN HANSEN; VIOLA HANSEN; JEFFREY SEVIER; NEWALOW WEEKES; PETER DUNNING; ANTHONY ANDERSON;

GARRISON WEEKES;

- n. Any electronic storage devices including all thumb drives, laptops, computer tablets, external computer storage hard drives, data CD ROM's, data DVD's, or external computer storage devices (to the extent they contain evidence, contraband, fruits and/or instrumentalities of violations of the Specified Federal Offenses).;
- o. Computer hardware, electronic devices, software, documentation, passwords, and/or data security devices related thereto (to the extent they contain evidence, contraband, fruits and/or instrumentalities of violations of the Specified Federal Offenses), including but not limited to:
 - 1. Computers, software, peripheral data storage devices, that may contain the items listed in this attachment, and all other equipment/material/programs needed to review the contents of the computer (with law enforcement allowed to take the computer and related material for off-site inspection and allowed 120 days from the day of the search to examine the content of computer and related equipment to determine whether it contains items to be seized – unless extended by order of court).
 - 2. Any computer equipment or digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the

- 1 crimes referenced above, or to create, access, process, or store
- 2 evidence, contraband, fruits, or instrumentalities of such crimes;
- 3 3. Any magnetic, electronic, or optical storage device capable of
- 4 storing data, such as floppy disks, hard disks, tapes, CD-ROMs,
- 5 CD-Rs, CD-RWs, DVDs, optical disks, printer or memory buffers,
- 6 smart cards, PC cards, memory calculators, electronic dialers,
- 7 electronic notebooks, personal digital assistants, and cell phones
- 8 capable of being used to commit or further the crimes referenced
- 9 above, or to create, access, or store evidence, contraband, fruits, or
- 10 instrumentalities of such crimes;
- 11
- 12 4. Any documentation, operating logs, and reference manuals
- 13 regarding the operation of the computer equipment, storage
- 14 devices, or software;
- 15
- 16 5. Any applications, utility programs, compilers, interpreters, and
- 17 other software used to facilitate direct or indirect communication
- 18 with the computer hardware, storage devices, or data to be
- 19 searched;
- 20
- 21 6. Any physical keys, encryption devices, dongles, or similar physical
- 22 items which are necessary to gain access to the computer
- 23 equipment, storage devices, or data;
- 24
- 25 7. Any passwords, password files, test keys, encryption codes, or
- 26 other information necessary to access the computer equipment,
- 27 storage devices, or data; and
- 28

- 1 8. All records, documents, programs, applications, or materials
2 created, modified, or stored in any form, including in digital form,
3 on any computer or digital device, that show the actual user(s) or
4 owners of the computers or digital devices during the time the
5 device was utilized to commit the crimes referenced above,
6 including the web browser's history; temporary Internet files;
7 cookies, bookmarked, or favorite web pages; email addresses used
8 from the computer; MAC IDs and/or Internet Protocol addresses
9 used by the computer; email, instant messages, and other electronic
10 communications; address books; contact lists; records of social
11 networking and online service usage; and software that would
12 allow others to control the digital device such as viruses, Trojan
13 horses, and other forms of malicious software (or alternatively, the
14 lack of software that would allow others to control the digital
15 device).
- 16 9. All records, documents, programs, applications, or materials
17 created, modified, or stored in any form, including in digital form,
18 on any computer or digital device, that show evidence of counter-
19 forensic programs (and associated data) that are designed to
20 eliminate data from the computer or digital device.
- 21 10. All records, documents, programs, applications, or materials
22 created, modified, or stored in any form, including in digital form,
23 on any computer or digital device, that show contextual
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information necessary to understand the evidence, contraband,
fruits, or instrumentalities described in this attachment.

11. All evidence called for in other portions of this attachment that
might be stored, created, recorded, or maintained in digital format.

UNITED STATES DISTRICT COURT

for the
Eastern District of California

In the Matter of the Search of

UNDER SEAL

The premises located at 9143 Newport West Way, Elk
Grove, California, 95758

Case No.

2:16-SW-0009

EFB 1

SEARCH AND SEIZURE WARRANT

SEALED

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Eastern District of California
(identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A1, attached hereto and incorporated by reference.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

SEE ATTACHMENT B1, attached hereto and incorporated by reference.

YOU ARE COMMANDED to execute this warrant on or before January 27, 2016 (not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to: any authorized U.S. Magistrate Judge in the Eastern
District of California.

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)

☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .

Date and time issued:

1-13-2016
at 12:25 p.m.


Judge's signature

City and state:

Sacramento, CaliforniaEdmund F. Brennan, U.S. Magistrate Judge

Printed name and title

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I swear that this inventory is a true and detailed account of the person or property taken by me on the warrant.

Subscribed, sworn to, and returned before me this date.

Signature of Judge

Date