
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : HON. JOSEPH A. DICKSON
 : :
 : :
 : Mag. No. 20-8426 (JAD)
 : :
MAURICE MILLS : :
 : :
 : **CRIMINAL COMPLAINT**

I, Joseph Patricola, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

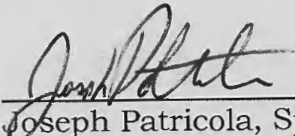
SEE ATTACHMENT A

In violation of Title 18, United States Code, Section 1343.

I further state that I am a Special Agent with the United States Department of Labor, Office of Inspector General, and a Task Force Officer with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Joseph Patricola, Special Agent
Department of Labor-OIG

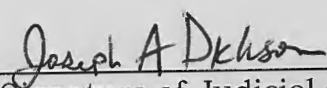
Agent Patricola attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A)

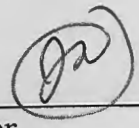
Sworn to before me and subscribed in my presence,

October 2, 2020

at District of New Jersey

HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer 

ATTACHMENT A

From in or about August 2020 through in or about September 2020, in the District of New Jersey and elsewhere, defendant

MAURICE MILLS

knowingly and intentionally devised and intended to a scheme and artifice to defraud the State of New York and individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, including a telephone call made from a location in New Jersey to a location outside of New Jersey.

In violation of Title 18, United States Code, Section 1343 and Section 2.

ATTACHMENT B

I, Joseph Patricola, am a Special Agent with the United States Department of Labor, Office of Inspector General, and a Task Force Officer with the Federal Bureau of Investigation. I am familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and in part unless otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act "CARES Act" was signed into law. The CARES Act created a new temporary federal program unemployment insurance program called Pandemic Unemployment Assistance ("PUA"). PUA provides unemployment insurance benefits ("UIBs") for individuals who are not eligible for other types of unemployment (e.g., self-employed, independent contractors, gig economy workers). The CARES Act also created a new temporary federal program called Federal Pandemic Unemployment Assistance ("FPUC") that provides an additional \$600 weekly benefit to those eligible for PUA and regular UIBs.

2. The New York State Department of Labor administers and manages the regular unemployment and PUA programs in the State of New York. Thus, subject to certain eligibility requirements, a person who is unemployed, but who used to be employed by an employer in the State of New York, can apply to receive UIBs from the State of New York. The State of New York offers an online portal ("the Portal") through which applicants can apply for UIBs and other types of benefits. In addition, the State of New York allows individuals to submit applications for UIBs over the telephone.

3. The State of New York logs information concerning claims for UIBs submitted through the Portal or over the telephone. Among other things, the State of New York logs Internet Protocol ("IP") addresses and phone numbers associated with UIB requests.

4. Records provided by the State of New York revealed that a single IP address ending in the digits 249 (the "IP Address") was used to submit UIB claims on behalf of more than approximately 20 individuals (the "IP Address Claims"). For example, on or about September 21, 2020, an IP Address Claim

was submitted by telephone via a call that originated from the IP Address and was received in a location in New York.

5. Records obtained from the provider of the IP Address revealed that, at all times relevant to the investigation described herein, the IP Address was a static IP address that resolved to a single residential location in New Jersey (the "NJ Location") and was subscribed to by an individual ("Individual 1").

6. Records provided by the State of New York also revealed that approximately three IP Address Claims directed that UIBs be mailed to a residential street address in New Jersey with the house number 342 (the "New Jersey Address"). The investigation has revealed that the New Jersey Address does not exist and that the residence bearing house number 344 on the same street is under construction. Based upon my training and experience, those involved in UIB and similar frauds often have funds sent to a drop location, such as a vacant or under-construction home, in order to thwart law enforcement.

7. Records provided by the State of New York further reveal that a telephone number ending in the digits 8970 (the "8970 Number") was used in connection with approximately four IP Address Claims that law enforcement believe to be fraudulent. Three applications were in the name of Texas residents but directed that the UIBs be sent to locations in New Jersey. An additional application was submitted on a recorded telephone call, during which the caller made unauthorized use of the name and personal identification information of a third party.

8. Records obtained by law enforcement from the provider of the 8970 Number revealed that it is subscribed to by Individual 1.

9. Records obtained from the State of New York revealed additional IP Address Claims submitted on behalf of Texas residents that directed the UIBs to be sent to locations in New Jersey. Based upon my training and experience, and the investigation to date, the fact that one IP address in New Jersey is making UIB claims to the State of New York for individuals residing in Texas but asking for the UIBs to be sent to New Jersey indicates that the claims are fraudulent.

10. Records obtained from a car dealership (the "Dealership") revealed that, on or about August 11, 2020, defendant MILLS and Individual 1 purchased a 2017 Mercedes-Benz (the "Mercedes") for approximately \$36,000. The records further reveal that defendant MILLS and Individual 1 paid for the Mercedes with credit cards and approximately \$14,000 in cash.

11. Records from the Dealership further revealed that defendant MILLS applied for credit in connection with the purchase of the Mercedes. On some of the credit application forms defendant MILLS provided the 8970 Number as his telephone number.

12. On or about September 25, 2020, an IP Address Claim was made to the State of New York. The claim directed the UIBs to be sent to the New Jersey Address. On or about September 28, 2020, a debit card with the UIBs was mailed to the New Jersey Address. On or about September 29, 2020, a withdrawal was made using the debit card at an ATM in New Jersey. The investigation to date, including surveillance of defendant MILLS earlier on September 29, 2020, and a review of the video of the withdrawal, revealed that defendant MILLS made the withdrawal.

13. Records in a law enforcement database indicate that defendant MILLS is associated with the NJ Location. On or about September 29, 2020, law enforcement observed defendant MILLS in the Mercedes in close proximity to the NJ Location.

14. To date, the IP Address Claims have resulted in more than approximately \$400,000 in actual losses and more than approximately \$600,000 in potential losses.