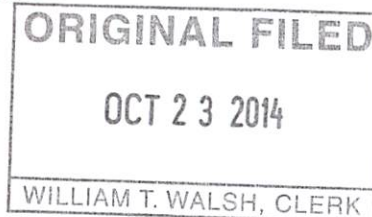


# UNITED STATES DISTRICT COURT

for the  
District of New Jersey



United States of America  
v.  
ROBERT S. ARMSTRONG

Case No.  
14-5564 (KMW)

Defendant(s)

## SUPERSEDING CRIMINAL COMPLAINT

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

On or about the date(s) of July 2014 through Oct. 21, 2014 in the county of Gloucester in the  
District of New Jersey, the defendant(s) violated:

*Code Section*

18 U.S.C. Section 1341

*Offense Description*

Two Counts of mail fraud -- see Attachment A hereto

This criminal complaint is based on these facts:

See Attachment B hereto

☒ Continued on the attached sheet.

*Complainant's signature*

Michael A. Marro, Jr., U.S. Postal Inspector

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 10/23/2014

City and state: Camden, New Jersey

*Judge's signature*

Hon. Karon M. Williams, U.S. Magistrate Judge

*Printed name and title*

RECEIVED

NOV 23 1964

UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20535

TO: DIRECTOR, FBI

FROM: SAC, NEW YORK

SUBJECT: [Illegible]

URGENT

RE: [Illegible]

On November 23, 1964, [Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

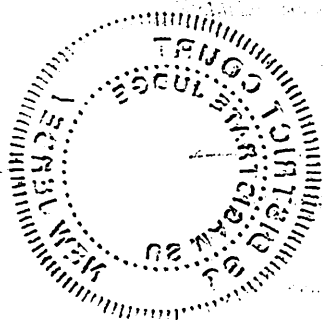
[Illegible]

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[Handwritten signature]

CONTENTS APPROVED

UNITED STATES ATTORNEY

  
By: \_\_\_\_\_

DIANA VONDRA CARRIG  
Assistant U.S. Attorney

Date: October 23, 2014

## ATTACHMENT A

### COUNT 1

At all times relevant to this Superseding Complaint and in furtherance of his scheme and artifice to defraud:

1. Robert S. Armstrong operated a business named Scholastic School Supply, LLC from his home in Franklinville, New Jersey.
2. Robert S. Armstrong rented and maintained control over two mail boxes at Commercial Mail Receiving Agents ("CMRA's") located in Sewell, New Jersey and Las Vegas, Nevada.
3. Robert S. Armstrong prepared invoices which sought payment in the amount of \$647.50 for an order of either math or English/language art workbooks which had not been ordered or received by the victim schools.
4. Robert S. Armstrong contracted with a bulk mailing company to mail via U.S. Mail the fraudulent invoices to more than 73,000 schools throughout the United States. The invoices contained return envelopes bearing the address of either of the two mail boxes in Sewell and Las Vegas which were under Robert A. Armstrong's control, so that the victim schools could mail their payments for the non-existent books back to Robert S. Armstrong.
5. Robert S. Armstrong received checks from various victim schools and deposited and caused to be deposited such checks into bank accounts which he had opened in the name of Scholastic School Supply, LLC.
6. From in or about July 2014 through on or about September 26, 2014, in Franklinville, in the District of New Jersey and elsewhere, the defendant,

ROBERT S. ARMSTRONG,

did knowingly and intentionally devise a scheme and artifice to defraud and obtain money by

means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did knowingly and with fraudulent intent deposit and cause to be deposited in any post office and authorized depository for mail matter, any matter or thing to be sent or delivered by the United States Postal Service, and took or received therefrom, any such matter or thing.

All in violation of Title 18, United States Code, Section 1341.

## COUNT 2

At all times relevant to this Superseding Complaint and in furtherance of his scheme and artifice to defraud:

1. Robert S. Armstrong operated a business named The Trend Publishing from his home in Franklinville, New Jersey.
2. Robert S. Armstrong rented and maintained control over a Post Office box located at P.O. Box 923, Malaga, New Jersey 08328.
3. Robert S. Armstrong prepared invoices which sought payment in the amount of \$495.00 for a 5" by 8" glossy advertisement in the "College Edition (Fall 2014 Edition)," which advertisement had not been ordered by the victim colleges and trade schools.
4. Robert S. Armstrong mailed or caused to be mailed the fraudulent invoices to numerous colleges and trade schools throughout the United States. The invoices contained return envelopes bearing the address of the above described Post Office box in Malaga, New Jersey, which was under Robert A. Armstrong's control, so that the victim colleges and trade schools could mail their payments for the advertisement back to Robert S. Armstrong.
5. Robert S. Armstrong received checks from various victim colleges and trade schools and deposited and caused to be deposited such checks into bank accounts which he had opened in the name of The Trend Publishing.
6. From in or about July 2014 through on or about October 23, 2014, in Franklinville, in the District of New Jersey and elsewhere, the defendant,

ROBERT S. ARMSTRONG,

did knowingly and intentionally devise a scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did knowingly and with fraudulent intent deposit and cause

to be deposited in any post office and authorized depository for mail matter, any matter or thing to be sent or delivered by the United States Postal Service, and took or received therefrom, any such matter or thing.

All in violation of Title 18, United States Code, Section 1341.

## **ATTACHMENT B**

I, Michael A. Marro Jr., being duly sworn depose and state the following:

### **Introduction**

1. I am currently employed as a United States Postal Inspector in Bellmawr, New Jersey, and I have been employed as a Postal Inspector for twelve years. My duties as a Postal Inspector have consisted of investigating persons and entities alleged to have committed federal criminal violations.

2. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have not included every detail of the investigation. Rather, I have set forth only those facts necessary to establish probable cause to believe that Robert S. Armstrong committed two mail fraud schemes, in violation of Title 18, United States Code, 1341.

3. The information contained in this affidavit is based upon my personal knowledge and observations, conversations with other law enforcement officers, witness interviews and the review of documents. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part.

### **The Investigation into the Activities of Armstrong Began with Complaints from Various Schools**

4. On or about August 5, 2014, the Philadelphia Division of the United States Postal Inspection Service ("USPIS") received a complaint from an administrative employee at Victim School 1 in Lexington, Massachusetts 02421 regarding a solicitation that the school believed was fraudulent. The solicitation contained an invoice for \$647.50 for an order of books that were neither ordered nor received. The vendor was a company named Scholastic School Supply located, according to the invoice, at 283 B Egg Harbor Road, Suite 197, Sewell, New



Jersey 08080.

5. On or about August 14, 2014, the USPIS received a complaint from an administrative employee of Victim School 2 in San Francisco, California 94134 regarding a similar fraudulent invoice that the school had received from Scholastic School Supply, 1350 E. Flamingo Road, Suite 820, Las Vegas, Nevada 89119, including an invoice for a textbook that was never received by the school. Before realizing that the invoice was fraudulent, Victim School 2 mailed a payment check for \$647.50 to the address listed above.

6. On September 4, 2014, I conducted an internal complaint review regarding Scholastic School Supply and identified more than 125 complaints received by the USPIS from various schools located throughout the United States relative to the same false billing scheme.

The Invoices Received by the Schools Contained Numerous Indicia of Fraud

7. I examined invoices received by various complaining schools and noticed several indicia of fraud, including the use of a false business address. Specifically, on the invoices, Scholastic School Supply listed its address as being 283 B Egg Harbor Road, Suite 197, Sewell, New Jersey 08080 or at 1350 E. Flamingo Road, Suite 820, Las Vegas, Nevada, 89119. Neither of these addresses is a physical business location but rather is a Commercial Mail Receiving Agent ("CMRA"). Specifically, the Sewell, New Jersey address is for a privately owned CMRA named "We R Mail," and correlates to mailbox number 197, and the Las Vegas, Nevada address is for a United Parcel Service ("UPS") Store and correlates to mailbox number 820. United States Postal Regulations prohibit businesses from using the word "suite" in their address when they have no physical location attributed to their business. Rather, such businesses are required to use the acronym "PMB" for Personal Mail Box. The purpose of this requirement

is to inform the receiver of the mail that the address is a CMRA and not a physical business address. Based upon my knowledge and experience in investigating mail fraud, I know that businesses that are involved in fraudulent activity often use CMRA's and list their business addresses as a "suite" to give the appearance that the business has a physical location when none actually exists in an attempt to lend an air of legitimacy to the business.

8. I obtained copies of documents pertaining to the rental of mailboxes 197 and 820 in Sewell and Las Vegas, respectively, and learned that each of those mailboxes had been rented by Robert S. Armstrong at an address in Franklinville, New Jersey. A review of the application to lease box 197 revealed that it was opened on July 7, 2014 by Robert S. Armstrong and that Armstrong had provided his New Jersey Driver's License listing his Franklinville residence as his address, as a means of photo identification to open the box. Similarly, a review of the application to lease box 820 in Las Vegas revealed that the box was opened on July 24, 2014 by Robert S. Armstrong, and that Armstrong again provided a copy of his New Jersey Driver's License in order to open the box.

9. I obtained a copy of the contract signed by Robert S. Armstrong from "We R Mail," in Sewell, New Jersey, which included a warning about the United States Postal Service's prohibition on misrepresenting a CMRA mailbox as a physical business location by using the word "suite."

10. I verified through U.S. Mail records and New Jersey Department of Motor Vehicles records that Robert S. Armstrong currently lives at the Franklinville, New Jersey address and has a valid New Jersey driver's license issued to him at that address.

11. Additionally, I learned that Armstrong opened the Las Vegas mailbox 820

as a “forwarding box,” meaning that he opened it with the sole purpose of having the mail from that box forwarded to another address at a prescribed time increment. Employees of the UPS Store in Las Vegas stated that Armstrong requested to have all mail received at box 820 forwarded directly to his residence in Franklinville, New Jersey on a weekly basis. UPS Store employees in Las Vegas stated that they had complied with Armstrong’s instructions and that all of the mail received in box 820 had been forwarded to Armstrong’s residence, including, necessarily, the mailing containing the payment from Victim School 2 described above. On or about September 22, 2014, I verified that the most recent mailing that forwarded mail from Box 820 was sent to Armstrong’s residence in Franklinville, New Jersey on September 22, 2014 and was delivered to that address on September 24, 2014.

12. On the invoices, Scholastic School Supply listed their office telephone number as 866-807-5778. This telephone number is out of service. Based upon my knowledge and experience in investigating mail fraud, I know that businesses involved in fraudulent activity often list a telephone contact number to give an air of legitimacy to the invoice, and also often list a phony telephone number to avoid receiving actual complaints from consumers.

13. On the invoices, Scholastic School Supply listed its Federal Employee Identification Number “FEIN” for tax filings as being 47-1264214. Investigation into this FEIN number revealed that it is not a legitimate FEIN. Based upon my knowledge and experience in investigating mail fraud, I know that businesses that are involved in fraudulent activity will list a non-existent FEIN number on documentation to give an air of legitimacy to that documentation, where none exists.

14. On the invoices, Scholastic School Supply purports to be selling math or

English/language arts workbooks. The invoice lists the workbooks' International Standard Book Number "ISBN" as 378-5929-4623 or 978-4217-3250. International agreements state that one agency per country is designated to assign ISBNs for the publishers and self-publishers located in that country. The United States ISBN Agency cannot assign ISBNs to publishers and self-publishers located outside the United States and its territories. The ISBN is a unique identifying number assigned to each book published in the United States. Investigation into the ISBNs listed on the invoices indicated that the books purported to be sold are either non-existent, that is, there are no books bearing the ISBNs from the invoices lawfully being sold in the United States, or that the ISBNs correspond to legitimate books but not the books named in the invoices.

#### Other Indicia of Fraud

15. I conducted further investigation into Scholastic School Supply and learned of other indicia of fraud with respect to that business. For example, I ran a record check through Dun and Bradstreet which showed that there was no business registered in the State of New Jersey by the name of Scholastic School Supply.

16. Similarly, I ran a record check with the Department of the Treasury which indicated that Scholastic School Supply is not a registered business and has not filed for an Employee Identification Number for tax filing.

#### Interviews and Surveillances Connected Armstrong to the Boxes and Invoice

17. On September 9, 2014, I interviewed the owner of "We R Mail" in Sewell, New Jersey. During that interview, the owner of "We R Mail" stated that Armstrong and his wife, A.A., pick up the mail from box 197 on a regular basis, that is, approximately every other day, and that Armstrong typically drove a new red Ford Mustang when he came to "We R Mail."

18. On September 11, 2014, Postal Inspectors conducted physical surveillance of Robert S. Armstrong. Inspectors observed Armstrong leave his residence at approximately 11:30 a.m. driving a red, 2014 Ford Mustang. Inspectors followed Armstrong directly from Armstrong's residence to the Franklin Savings Bank located at 2039 Delsea Drive, Franklinville, New Jersey 08322. Once Armstrong left the bank, I interviewed bank employees regarding Armstrong's business transactions that day. Franklin Savings Bank employees stated that Armstrong had attempted to open three business checking accounts, one in the name of Scholastic School Supply, LLC, but that employees had refused to open such accounts because Armstrong did not have valid FEIN documentation from the Department of Treasury.

19. On September 15, 2014, Postal Inspectors conducted physical surveillance of the "We R Mail" store in Sewell, New Jersey. At approximately 12:00 p.m., Inspectors observed Armstrong's wife, A.A., arrive at the store, access the mail box leased by Armstrong, take the mail and place it into her automobile. Inspectors followed A.A. from the "We R Mail" store to a UPS Store located at 816 North Delsea Drive, Glassboro, New Jersey 08028, where she accessed another mail box. A.A. then drove directly back to her and Robert S. Armstrong's Franklinville residence.

20. On September 22, 2014, I analyzed samples of the fraudulent invoices that had been mailed on behalf of Scholastic School Supply. The U.S. Postage Paid envelopes indicated that the mailings were sent from Portland, Maine 04104, and had been paid by bulk mail permit number 492. A bulk mailer is a company or individual that prepares mailings for others and receives a discounted postage rate from the United States Postal Service because they mail in bulk quantities. Each bulk mailer has a unique permit number assigned to them for

postage billing. I learned that in Portland, Maine, permit number 492 belongs to a bulk mailing company named Mailings Unlimited, 116 Riverside Industrial Parkway, Portland, Maine 04103.

21. I spoke with the owner of Mailings Unlimited on several occasions during the pendency of this investigation. During one of those conversations, the owner stated that Mailings Unlimited received via email a one page solicitation/letter from Robert S. Armstrong via email together with a list of schools and addresses to which Armstrong wanted the solicitations mailed. Mailings Unlimited took Armstrong's one page solicitation and conducted a mail merge, inserting the name and address of each school into the one page form solicitation and then sent out the mailings to the various schools in batches. Each mailing sent by Mailings Unlimited on behalf of Scholastic School Supply included an envelope -- for the school's payment -- preaddressed to Scholastic School Supply at one of Armstrong's CMRAs, either in Sewell or Las Vegas.

22. On September 23, 2014, I received the mailing history of Scholastic School Supply from Mailings Unlimited. Analysis of the mailing records showed that from August 15, 2014 through September 4, 2014, Mailings Unlimited sent via U.S. Mail on behalf of Scholastic School Supply, approximately 73,077 copies of that solicitation letter to various schools throughout the United States. Mailings Unlimited sent me a copy of the business reply envelopes that were sent along with the invoice solicitations, which bore the addresses of the CMRA mailboxes rented by Armstrong in July 2014, that is, 283-B Egg Harbor Road, Suite 197, Sewell, New Jersey 08080 and 1350 E. Flamingo Road, Suite 820, Las Vegas, Nevada 89119.

Armstrong Has Deposited Proceeds from the False Billing Scheme into Various Bank Accounts

23. As part of the investigation, I have been seeking information regarding the location of the proceeds from Armstrong's false billing scheme. To that end, I have interviewed several bank employees and have issued subpoenas for various bank records. To date, I am aware of approximately eight bank accounts opened by Robert S. Armstrong in the name Scholastic School Supply LLC, which contained proceeds from the false billing scheme. The Government has applied for and obtained seizure warrants for five of those accounts and has seized, to date, approximately \$281,440.46. In addition, the Government will be seeking an additional seizure warrant for a sixth bank account which contains approximately \$45,232.00 in proceeds from the false billing scheme. The remaining two bank accounts were closed in September.

Armstrong Admitted to Sending Invoices to Schools for Non-Existent Books

24. In addition, the United States sought and obtained a search warrant for Armstrong's Franklinville residence, which was executed by United States Postal Inspectors on or about September 26, 2014.

25. Shortly after the execution of the search warrant on Armstrong's residence, Armstrong agreed to come to the Franklinville Police Department for an interview. During that interview, Armstrong stated the following, in substance and in part:

a. Armstrong decided that he would develop and sell text books to schools and went into business using the name Scholastic School Supply.

b. Armstrong sent out more than 70,000 invoices via a bulk mailing company in Maine to various schools, billing them in advance for the text books he had not yet created.

c. Armstrong wanted the invoices to look professional so that the schools would think they were real. In that vein, Armstrong made-up an ISBN number to include on the invoices because he knew that all real text books have ISBN numbers.

d. Armstrong knew that it was wrong to send out the invoices before he had created a text book.

Armstrong Was Arrested on October 16, 2014 and Charged with Mail Fraud

26. On October 16, 2014, Postal Inspectors arrested Robert S. Armstrong based on a Criminal Complaint, Mag. No. 14-5564 (KMW), charging him with mail fraud in violation of 18 U.S.C. § 1341, based upon the Scholastic School Supply false billing scheme.

27. Armstrong appeared before the Honorable Karen M. Williams, United States Magistrate Judge, that afternoon and was released on bail.

After His Arrest, Armstrong Continued to Attempt to Pick Up Scholastic School Supply's Mail

28. Thereafter, I received information from various employees of CMRAs and Post Offices where Armstrong had rented mail boxes that Robert S. Armstrong was continuing to ask for and pick up mail in the name of Scholastic School Supply and/or from boxes opened in the name of Scholastic School Supply. For example, I spoke with an employee of the U.S. Postal Service in Malaga, New Jersey, who stated in substance and in part that Armstrong had picked up mail from P.O. Box 923 on October 21, 2014 opened in the name of Trend/Scholastic, and had opened up mail and thrown away what appeared to be check stubs. The Postal employee seized the check stubs out of the garbage and sent them to me. The stubs, which I received on October 23, 2014, were from checks for \$495.00 to The Trend Publishing from two colleges.

29. I verified through U.S. Postal Service records that P.O. Box 923, Malaga,



New Jersey 08328 was opened by Robert Armstrong under the name Trend/Scholastic on June 24, 2014, and that Armstrong provided his above mentioned New Jersey driver's license listing his Franklinville address as the photo identification required by U.S. Postal Service regulations to open a P.O. box.

30. Because Armstrong distributed the fraudulent Scholastic School Supply invoices to more than 73,000 schools, I believe it is likely that mail addressed to Scholastic School Supply will contain evidence of the mail fraud violation charged in the Criminal Complaint described above, including but not limited to checks from additional victim schools who are not yet aware of the scheme.

The Government Filed A Motion to Revoke Armstrong's Bail

31. On October 21, 2014, the Government filed a motion seeking to revoke Armstrong's bail based upon his attempts to tamper with evidence by continuing to access and/or attempt to access mail addressed to Scholastic School Supply.

32. The Honorable Karen M. Williams scheduled a hearing on the Government's motion that same afternoon, which I attended. Prior to the hearing, the Assistant U.S. Attorney and I had a conversation with defendant's attorney during which the attorney stated that Robert Armstrong had not picked up any mail from Scholastic School Supply, but rather had picked up mail related to his other business entities, specifically, The Trend Publishing. During that conversation, the defense attorney showed me checks from two colleges for \$495.00 each made payable to The Trend Publishing, P.O. Box 923, Malaga, New Jersey 08328, which Armstrong had allegedly picked up earlier that day from his Post Office Box in Malaga, New Jersey. These checks matched the stubs which the Postal employee had recovered

from the garbage of the Malaga Post Office earlier that afternoon.

33. At the hearing on October 21, 2014, Judge Williams denied the Government's motion for revocation of bail. However, Judge Williams amended the conditions of Robert S. Armstrong's bail to prohibit him from going to any Post Office boxes and also to prohibit him from accepting, receiving or forwarding any mail addressed to Scholastic School Supply. Judge Williams further ordered that the Postal Inspectors sort through all of the mail received at Armstrong's mail boxes and deliver mail not addressed to Scholastic School Supply to Armstrong's attorney. To effectuate the review of such mail, defense counsel listed seven other businesses which Armstrong operated, including: (1) Asset Recovery Services; (2) Legal Recovery Services; (3) Money Finders; (4) The Trend Publishing; (5) YP Direct; (6) Yes Network; and (7) Fidelity Financial.

34. I contacted the two colleges listed on the check stubs recovered from the Malaga Post Office, and received a copy of the invoice from The Trend Publishing addressed to Victim College 1. That invoice appeared very similar in format to the Scholastic School Supply invoices except that it sought payment for what is believed to be advertising for the college, that is, \$495.00 for a 5" by 8" glossy ad to be placed in the "College Edition (Fall 2014 Edition)."

35. I ran computer searches of the name College Edition through Google, bookfinders.com and the Library of Congress, and was unable to find any records of any book entitled College Edition.

36. I ran a record check through Dun and Bradstreet which showed that there was no business registered in the State of New Jersey by the name of The Trend Publishing.

37. Additionally, on the invoice I received from Victim College 1, The Trend

Publishing listed its Federal Employee Identification Number "FEIN" for tax filings as being 47-12239908. Investigation into this FEIN number revealed that it is not a legitimate FEIN. As discussed above, based upon my knowledge and experience in investigating mail fraud, I know that businesses that are involved in fraudulent activity will list a non-existent FEIN number on documentation to give an air of legitimacy to that documentation, where none exists.

38. In addition, on the invoice from Victim College 1, The Trend Publishing listed its telephone number as 1-844-344-2095. This telephone number is out of service. As discussed above, based upon my knowledge and experience in investigating mail fraud, I know that businesses involved in fraudulent activity often list a telephone contact number to give an air of legitimacy to the invoice, and also often list a phony telephone number to avoid receiving actual complaints from consumers.

39. On October 22, 2014, I spoke to the Dean of Finance from Victim College 2 – the second college listed on the check stubs recovered from the garbage of the Malaga Post Office on October 21, 2014. The Dean stated, in substance and in part, that his office had mailed a check for \$495.00 to The Trend Publishing via U.S. mail to P.O. Box 923, Malaga, New Jersey 08328, and that no one in the purchasing department had any knowledge of ordering any advertisement with The Trend Publishing and that no one could even identify what the "College Edition (Fall 2014 Edition)" was.

40. On October 22, 2014, I received bank records from Wells Fargo Bank for various accounts opened by Robert S. Armstrong, including an account in the name of The Trend Publishing. A review of the Wells Fargo Bank records for The Trend Publishing showed that from in or about July 2014 through August 2014, Robert S. Armstrong deposited approximately

59 checks for \$495.00 each from various colleges and trade schools throughout the United States -- including a law school and a medical school -- for a total amount of approximately \$29,205. In addition, bank records revealed that Armstrong deposited additional checks from various businesses, several of which appear to be related to automobile sales and/or service, in the amount of \$495.00 each.

41. I made contact with several schools to inquire about the mailed payments and cancelled checks. On October 22, 2014, I spoke with an accounting analyst for Victim College 3, who confirmed that Victim College 3 had mailed a check dated July 16, 2014 for \$495.00 to The Trend Publishing at P.O. Box 923, Malaga, NJ 08328. Wells Fargo records show that the check from Victim College 3 was deposited into The Trend Publishing's account on July 28, 2014. The accounts analyst confirmed that Victim College 3 received the invoice via U.S. Mail, and that the invoice was for a "5 x 8 Glossy Ad" for the Fall 2014 Edition. The analyst sent me a copy of the invoice received by Victim College 3 and it was similar to the invoice received by Victim College 1, described above. After conferring with the marketing director, the analyst stated that Victim College 3 was not aware of nor did it authorize any such order for advertisement, and that they had no knowledge of what the College Edition, Fall 2014 was supposed to mean or which publication to which it was affiliated. The analyst further added that the payment was processed without proper verification of the invoice.

42. On October 22, 2014, I spoke with the financial controller from Victim College 4, who confirmed that she had received an invoice for \$495.00 from The Trend Publishing via U.S. Mail sometime in late July 2014 for a 5" x 8" glossy advertisement that was to be placed in the Fall 2014 Edition. The controller stated that she did not order or authorize

any such advertisement order and added that she was angry at herself for “letting this one slip past” her. The controller also confirmed that the payment check from Victim College 4 was sent via U.S. Mail to The Trend Publishing, P.O. Box 923, Malaga, NJ 08328 on August 8, 2014. Through Wells Fargo Bank records, I confirmed that this check was deposited into Armstrong’s Wells Fargo The Trend Publishing account on or about August 14, 2014.

43. I had another similar conversation with an employee of Victim College 5, and received a copy of another similar invoice addressed to Victim College 5 from The Trend Publishing. That employee also verified that Victim College 5 mailed a \$495.00 check to The Trend Publishing for an advertisement that it never ordered.

44. A bank investigator from Wells Fargo advised that Armstrong’s account for The Trend Publishing was closed due to suspicion of fraud on or about September 17, 2014, as were his other accounts in the name of Scholastic School Supply. The bank investigator further advised that Wells Fargo Bank issued Armstrong a bank check dated September 23, 2014 in the amount of \$63,367.99 dollars.

45. From examining relevant bank records and talking to bank investigators, I am aware that Armstrong deposited that Wells Fargo Bank check into a PNC Bank account in the name of Scholastic School Supply, LLC on or about September 25, 2014. Pursuant to a lawfully obtained seizure order, Mag. No. 14-2047 (JS), I seized the contents of that PNC Bank account on or about October 1, 2014.