

22 We are not certain of the total amount ABBAS has made from the purchase and laundering of Economic Impact Payments debit cards. I can assume it runs in millions of US dollars because for the 7 day period we recorded him, he bought and laundered Economic Impact Payments debit cards worth \$429,800.

23 We are currently working to unmask the identity of ABBAS's accomplice "AJ".

24 We are also working with relevant authorities and bodies to take down the underground cyber criminal marketplace called StimulusCard ("<https://stimuluscard.com/>").

18                    ABBAS bought between 7 to 10 Economic Impact Payments debit cards daily for the period we recorded him. He purchased a total of 58 Economic Impact Payments debit cards in this period, with a total value of \$429,800.

19                    Of the 58 Economic Impact Payments debit cards, ABBAS chose the virtual card option for 36 EIP cards and he selected the plastic physical card option for 22 EIP cards.

20                    ABBAS was in constant communication with one AJ. ABBAS sent all the cards he bought from stimuluscard.com to AJ. ABBAS gave instructions to AJ on what to shop online. He gave instructions on what to do with the purchased items. ABBAS also gave instructions on cash withdrawal from ATMs with the plastic cards.

21                    One of the communications between ABBAS and AJ were as follows

ABBAS: "Guy hw fr? You don receive the 5 new EIP cards?"

AJ: "Yes bro"

ABBAS: "Ok. Try pull out all the funds today."

AJ: "I'm on it already. Done 2 already."

ABBAS: "Nice one. What about the online purchase for yesterday? I say make you focus on iPhones 13 and PS5. Those ones dey very easy to resell."

AJ: "Yes. I finished that last night. Emptied the cards on Amazon. Iphones and PS5. I already received the 6 Macbook Air and 3 iPad Pro I ordered 3 days ago. My guys came pick them up this morning."

ABBAS: "Aiit. I go send you more EIP cards today."

After this conversation, ABBAS went ahead to buy more Economic Impact

Central District of California, were instructed to setup a dedicated computer for ABBAS. Any time ABBAS requests for access to the internet, he should be given that dedicated computer. Only ABBAS should be given that computer.

13                From 7<sup>th</sup> March 2022 to 13<sup>th</sup> March 2022, we monitored and recorded ABBAS internet activities. In this period, he requested internet access daily. He spent an average of 55 minutes for each session.

14                During this period, we found out that ABBAS was actively buying Economic Impact Payments debit cards from an underground cyber criminal marketplace where hackers sell Economic Impact Payments debit cards for Bitcoins.

## **B        Economic Impact Payments Debit Cards Purchase and Money Laundering**

15                I found out that ABBAS uses underground cyber criminal marketplace called StimulusCard (“<https://stimuluscard.com/>”) which is a marketplace for hackers to sell Economic Impact Payments debit cards for Bitcoins.

16                On Stimuluscard.com, hackers listed Economic Impact Payments debit cards with different balances. I found Economic Impact Payments debit cards from \$1,400 balance to as high as \$8,000. These cards were applied for by the hackers using compromised and stolen data of US citizens and residents.

17                I found out that criminals can order a virtual option of Economic Impact Payments debit cards and receive it instantly. They use this for online purchases. Criminals can also order for the plastic version of Economic

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I, ANDREW JOHN INNOCENTI, being duly sworn, declare and state as follows:

## **I INTRODUCTION**

1 I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since approximately March 2015. I am currently assigned to the Los Angeles Field Office, High-Tech Organized Crime Squad, where I primarily investigate cyber-enabled fraud and business email compromise ("BEC") schemes. Between approximately August 2015 and December 2018, I was assigned to a cyber-crime squad in the Chicago Field Office, where I investigated cyber-related crimes, including BEC cases. During my career as an FBI Special Agent, I have participated in numerous computer-crime investigations. In addition, I have received both formal and informal training from the FBI and other institutions regarding computer-related investigations, computer technology, and white-collar fraud.

2 This affidavit is made in support of Affidavit 1 of Case No 2:20-mj-02992 against, and arrest warrant for, RAMON OLORUNWA ABBAS, also known as ("aka") "Ray Hushpuppi," aka "Hush" ("ABBAS"), for violation of 18 U.S.C. § 1956(h) (Conspiracy to Engage in Money Laundering).

3 The facts set forth in this affidavit are based upon my personal involvement in this investigation, my review of reports and other documents related to this investigation, my training and experience, and information obtained from other agents, law enforcement officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of the government's investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance

**A     Security Alerts on ABBAS Activities**

Inmates in correctional facilities across the US are allowed certain activities which includes access to phone calls, the internet and computers with limited and regulated usage. In this affidavit, I will discuss ABBAS activities that triggered a security alert.

7       Inmates in correctional facilities across the US are allowed certain activities which includes access to phone calls, video calls, the internet, and computers with limited and regulated usage.

8       Inmates have constitutional rights to their privacy. Phone calls from correctional facilities by inmates are not recorded except when necessary and a warrant is obtained for this purpose. Inmates internet activities are not logged or recorded except when necessary and a warrant is obtained for this purpose.

9       ABBAS was also allowed these privileges like every other inmate.

10      Between 28<sup>th</sup> January 2022 and 4<sup>th</sup> March 2022, security officers at the US Federal correctional facility, Central District of California, observed more frequent usage of the internet by ABBAS. With the knowledge that the crimes ABBAS committed which he is being charged for are all internet related crimes, security officers were concerned and informed the Federal Bureau of Investigation (“FBI”).

11               On 7<sup>th</sup> March 2022, we obtained a federal search warrant, issued by Central District of California, to monitor and record ABBAS internet activities.

4           RAMON OLORUNWA ABBAS is a Nigerian national previously living in the United Arab Emirates (the “U.A.E.”) but currently incarcerated in the US Federal correctional facility, Central District of California, on charges of money laundering. The FBI’s investigation has revealed that ABBAS, while in a US Federal correctional facility, participated in the purchase of Economic Impact Payment debit cards fraudulently obtained from compromised data of US citizens.

5           Economic Impact Payments –commonly referred to as “stimulus checks” or “recovery rebates”– are a key provision of the Coronavirus Aid Relief and Economic Security (CARES) Act legislation that Congress passed to help reduce the financial burden on citizens and residents across the United States. Economic Impact Payments are non-taxable income that does not need to be paid back. Economic Impact Payments debit cards are a means of disbursement of payments. Economic Impact Payments debit cards, commonly called EIP cards, are issued on the VISA network by Meta Bank, South Dakota, US.

6           This affidavit presents new information involving ABBAS which supports Affidavit 1 of Case No 2:20-mj-02992. Recorded internet activities (reviewed pursuant to a federal search warrant issued in this District) of ABBAS in the US Federal correctional facility, Central District of California, reflect that ABBAS purchased Economic Impact Payments debit cards and laundered the proceeds totaling over \$400,000.