IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CRIMINAL NO. JKB-22-232**
	*	
ALEXANDER BARABASH,	*	
	*	
Defendant	*	
	*******	

DECLARATION OF SPECIAL AGENT DANIEL SCHELER

I, Daniel Scheler, Special Agent with the United States Secret Service ("USSS"), do hereby declare:

1. I am currently a Special Agent with the USSS. I have been a Special Agent with the USSS since May 2014. I am currently assigned to the USSS Baltimore Field Office as a Group Leader. During my time with the USSS, I have been involved with multiple assignments. These assignments include providing protection to the President and Vice President of the United States and investigating a variety of financial crimes. These crimes include manufacturing counterfeit currency, identity theft, access device fraud, and wire/check/bank fraud. To investigate these crimes, I have received extensive training in financial fraud investigative techniques and procedures. In addition to being a Group Leader, I am also one of the Asset Forfeiture Representatives ("AFR") for the USSS Baltimore Field Office and have been since 2016.

2. As an AFR, I have received training pertaining to asset forfeiture laws. My duties as an AFR include identifying assets to be targeted and seized during criminal investigations, assisting victims of financial crimes in attempting to recoup lost assets, and providing assistance to other law enforcement agencies in seizing the proceeds gained from financial fraud schemes.

3. I am the case agent involved in the investigation of Alexander Barabash (the "Defendant"), and thus, I am familiar with efforts to locate the proceeds of his criminal conduct.

4. In searching for proceeds of the Defendant's criminal conduct, agents and employees of the USSS conducted an investigation into the Defendant's assets, including assets directly traceable to his offense of conviction. I and other employees of the USSS continue to monitor the Defendant's finances.

5. I am aware that a thorough investigation failed to locate all the proceeds of the Defendant's offenses. I am also aware that on June 27, 2023, the Court entered a Preliminary Order of Forfeiture imposing a money judgment in the amount of $1,295,000 against the Defendant. ECF No. 32. The Defendant still owes the full amount of that money judgment.

6. Based on my communications with the investigators involved in this case, I have learned that diligent efforts to locate the proceeds of Defendant's criminal offenses have been unsuccessful. Based on my training and experience, I conclude that, due to the acts or omissions of the Defendant, the proceeds cannot be located with due diligence because they were transferred or sold to, or deposited with, a third party, placed beyond the jurisdiction of the Court, substantially diminished in value, or commingled with other property which cannot be divided without difficulty.

7. I have learned that the Defendant owns real property located at 5575 E. Sheena Drive, Scottsdale, Arizona (the "Subject Property").

8. The Subject Property is subject to forfeiture as a substitute asset in partial satisfaction of the Defendant's forfeiture money judgment, which remains outstanding.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this __12__ day of April, 2025.

Daniel Scheler
Daniel Scheler
Special Agent
United States Secret Service