UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-CR-20011-COOKE

UNITED STATES OF AMERICA

v.

DAVID TYLER HINES,

Defendant.

DECLARATION OF POSTAL INSPECTOR BRYAN MASMELA IN SUPPORT OF PRELIMINARY ORDER OF FORFEITURE

I, BRYAN MASMELA, under penalty of perjury, declare:

1. I am a United States Postal Inspector and have been employed by the United States Postal Inspection Service since February 2003. As a U.S. Postal Inspector, your affiant is responsible for the investigation of violations of United States law, including violations of Title 18 of the United States Code. I am currently assigned to the mail fraud team in the Miami Division and my duties include investigating cases related to mail fraud, wire fraud, bank fraud, money laundering, and related financial crimes. I am authorized to obtain and execute federal arrest, search, and seizure warrants.

2. The information contained in this declaration is based upon my personal knowledge and my review of documents and records gathered during the course of this investigation, as well as information obtained, directly or indirectly, from other sources and agents, including information provided to me by other agents who are involved in the investigation. I make this declaration in support of the United States' Motion for Preliminary Order of Forfeiture against David Tyler ines (the "Defendant"). Because this declaration is being submitted for a limited

purpose, it does not include all of the facts that I have learned during the course of the investigation. All dates and amounts discussed in this declaration are approximate.

3. I have reviewed Paycheck Protection Program ("PPP") loan applications and financial records for the Defendant and companies owned and controlled by the Defendant, including Cash in Holdings LLC ("CIH"), Unified Relocation Solutions LLC ("URS"), and Promaster Movers Inc. ("PM") (collectively, the "Companies").

4. Based on my review of the PPP loan applications and financial records for the Companies, the Defendant applied for and was approved for three PPP loans that were disbursed into the following accounts:

Date	Account	Amount
5/11/2020	account number 898105927423 at Bank of America ("BOA *7423")	$10,380.00
5/13/2020	account number 898077556016 at Bank of America ("BOA *6016")	$794,835.00
5/26/2020	account number 898099756470 at Bank of America ("BOA *6470")	$3,179,342.00
	TOTAL	**$3,984,557.00**

5. Between May 13 and 14, 2020, $400,000.00 was transferred from BOA *6016 to account number 898096330857 at Bank of America ("BOA *0857").

6. Additionally, on May 18, 2020, $318,497.53 was wire transferred from BOA *0857 for the purchase of the 2020 Lamborghini Huracán with vin ZHWUF4ZF3LLA13255.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 16th, 2021

BRYAN MASMELA
Postal Inspector, USPIS