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DISTRICT OF MARYLAND
BY _____ Deputy

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

AMAR SALIM SHABAZZ,

Defendant.

Case No. 21-mj-3245-ADC

Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your Affiant, Michael Shao, being duly sworn, deposes and states the following:

INTRODUCTION

1. Your Affiant makes this affidavit in support of a Criminal Complaint charging Amar Salim SHABAZZ with one count each of Mail Fraud (18 U.S.C. § 1341) and Obstruction of Justice (18 U.S.C. § 1519).

AFFIANT

2. Your Affiant is a Special Agent with Homeland Security Investigations (HSI) and has been so employed since October 2010. Your Affiant has personally participated in numerous federal investigations involving violations of federal criminal statutes including mail fraud, wire fraud and conspiracy. Prior to your Affiant's appointment with HSI, your Affiant was employed as a Special Agent with the Internal Revenue Service – Criminal Investigation for approximately five years. Your Affiant is a "federal law enforcement officer" within the meaning of Federal Rules of Criminal Procedure 41(a)(2)(C).

3. Your Affiant is familiar with the facts and circumstances of this investigation based upon his review of the available information and also based upon information provided from others

involved with the investigation currently being conducted, including investigators with the U.S. Postal Inspection Service (USPIS), U.S. Health and Human Services – Office of Inspector General (HHS-OIG), and the Baltimore County Police Department (BCPD). Your Affiant has not included every fact known through the course of the investigation within this affidavit but has included those facts your Affiant believes are sufficient to establish probable cause that the violations set forth above have been committed and that the defendant named in the Criminal Complaint committed them. All conversations and statements detailed in this affidavit are related in substance and in part, unless otherwise indicated.

STATEMENT OF FACTS

4. This affidavit in support of a Criminal Complaint pertains to an ongoing investigation into Amar Salim SHABAZZ (“SHABAZZ”) and a scheme involving the importation of bulk quantities of fraudulent COVID-19¹ Vaccination Record Cards (hereinafter referred to as “COVID vaccination cards”) into the United States and the subsequent sale and distribution of the cards for personal gain. Since June 2021,² SHABAZZ has purchased over 600 fraudulent COVID vaccination cards through a foreign online marketplace and caused the items to be unlawfully imported into the United States. Once received, SHABAZZ offered the fraudulent COVID vaccination cards for sale through multiple social media platforms including Instagram, Facebook, and YouTube. SHABAZZ then distributed the vaccination cards he sold, including some via the United Parcel Service (UPS).

¹ On March 11, 2020, the World Health Organization (WHO) designated COVID-19 as a pandemic. On December 11, 2020, the U.S. Food and Drug Administration (FDA) issued the first emergency use authorization (EUA) for a vaccine relating to COVID-19.

² All dates and times detailed within this affidavit are approximations. The words “on or about” and “approximately” are omitted for brevity.

COVID Vaccination Cards

5. Under normal circumstances, COVID vaccination cards are distributed by health care providers to vaccine recipients at the time the recipient receives a COVID-19 vaccine. Information documented on the vaccination card includes, *inter alia*, the vaccine recipient's name, date of birth, and the date(s) the vaccines were administered.

6. The most widely recognized COVID vaccination card in the United States is the Centers for Disease Control and Prevention (CDC) COVID-19 Vaccination Record Card. As displayed below, the title "COVID-19 Vaccination Record Card" appears at the top of the front of the card and the logos of the U.S. Department of Health and Human Services (HHS) and the CDC are displayed on the top right corner next to the title.

Vaccine	Product Name/Manufacturer Lot Number	Date	Healthcare Professional or Clinic Site
1 st Dose COVID-19		mm / dd / yy	
2 nd Dose COVID-19		mm / dd / yy	
Other		mm / dd / yy	
Other		mm / dd / yy	

7. Recently, increasing numbers of government and privately-owned entities have implemented requirements or have announced plans to require individuals provide proof of their COVID-19 vaccination status prior to being admitted to certain locations, as terms of employment, to avoid being subjected to additional requirements and/or for other purposes. The COVID vaccination card is one of the primary means by which an individual can provide proof of their

vaccination status. Such government and privately-owned entities rely upon the authenticity of the COVID vaccination cards presented to them.

8. Since the beginning of August 2021, U.S. Customs and Border Protection (CBP) Officers have seized thousands of fraudulent COVID vaccination cards at international mail facilities and at express consignment carrier facilities, such as those operated by FedEx Express (FedEx) and DHL Express (DHL). The majority of the seized shipments found to contain the fraudulent COVID vaccination cards originated from Asia and were commonly found to be falsely described on shipping manifests and other records as containing “paper card[s],” “card[s],” “greeting card[s],” or other terms.

9. During the course of the investigation, law enforcement seized numerous fraudulent COVID vaccination cards from an imported shipment intended for SHABAZZ, from a vehicle owned by SHABAZZ, and recovered from individuals whom SHABAZZ sold to. Upon close examination, the following misspellings of “COVID-19” were commonly found among the COVID vaccination cards seized:

Reminder! Return for a second dose! ¡Recordatorio! ¡Regrese para la segunda dosis!	
Vaccine	Date / Fecha
COVID-19 vaccine Vacuna contra el COVID-19	____/____/____ mm dd yy
Other Otra	____/____/____ mm dd yy
Bring this vaccination record to every vaccination or medical visit. Check with your health care provider to make sure you are not missing any doses of routinely recommended vaccines. For more information about COVID-19 and COVID-19 vaccine, visit cdc.gov/coronavirus/2019-ncov/index.html. You can report possible adverse reactions following COVID-19 vaccination to the Vaccine Adverse Event Reporting System (VAERS) at vaers.hhs.gov. 08/17/20	Lleve este registro de vacunación a cada cita médica o de vacunación. Consulte con su proveedor de atención médica para asegurarse de que no le falte ninguna dosis de las vacunas recomendadas. Para obtener más información sobre el COVID-19 y la vacuna contra el COVID-19, visite español.cdc.gov/coronavirus/2019-ncov/index.html. Puede notificar las posibles reacciones adversas después de la vacunación contra el COVID-19 al Sistema de Notificación de Reacciones Adversas a las Vacunas (VAERS) en vaers.hhs.gov. MLS-319813_r

Social Media Accounts Utilized by SHABAZZ

10. In October 2021, law enforcement obtained warrants authorizing searches of multiple electronic accounts used by SHABAZZ, including:

- An Instagram account with usernames: “ybn_ace_” and “ybnace7x”³ (the “SHABAZZ Instagram account”);
- A Facebook account with username: “amar.shabazz”⁴ (the “SHABAZZ Facebook account”); and
- Google user account: “ybn.ace777@gmail.com”⁵ (the “SHABAZZ Google account”).

11. In April 2021, SHABAZZ became under the supervision of the Maryland Department of Public Safety and Correctional Services (DPSCS) after being sentenced in the Circuit Court of Maryland for Baltimore County for possession of child pornography. SHABAZZ provided his email address and telephone number to DPSCS as the SHABAZZ Google account and (443) 355-9616 (the “SHABAZZ T-Mobile number”), respectively. The SHABAZZ T-Mobile number appears on account records for the SHABAZZ Instagram, Facebook, and Google accounts.

12. Account records identify the account holder of the SHABAZZ Instagram, Facebook, and Google accounts as “Ybn Ace.” On October 1, 2021, law enforcement searched a basement used by SHABAZZ and located numerous handwritten notes, including one titled “Rap Name: Ace YBN.” Among the other handwritten notes recovered were ones titled “Things Im doing when I

³ See Warrant# 1:21-mj-2843 TMD and 1:21-mj-2973 TMD. On October 3, 2021, the username for the SHABAZZ Instagram account was changed from “ybn_ace_” to “ybnace7x.”

⁴ See Warrant# 1:21-mj-2973 TMD

⁵ See Warrant# 1:21-mj-2841 TMD

get out (updated),” “Different options,” and “SCAM Life/Legit.” Within the notes recovered were statements including:

- “Hire a lawyer and get tips of what not to do when getting money illegally, get advice and other shit.”
- “When I first get outside buy my main phone, then 2 burner androids. First Burner is for scamming ...”
- “Be registered at pops But don’t stay there stay at moms in Basement, visit main address a few times so they’ll know I’m there frequently.”⁶
- “Buy guns from Dark web or [Company A] if for some reason I can’t get my gun liseance.”

13. In October 2021, your Affiant viewed the publicly accessible pages relating to the SHABAZZ Instagram and Facebook accounts and found both to contain multiple photos of an individual your Affiant recognized as SHABAZZ. The following photo of SHABAZZ appeared as the profile photo on both accounts:



⁶ Your Affiant has reason to believe that “Be registered” was in reference to SHABAZZ’s registration on the sex offender registry. As detailed below, SHABAZZ was encountered by law enforcement during the search of an Owings Mills residence where his mother resides. Located within the basement were multiple items related to SHABAZZ, including his driver’s license.

14. Based upon the foregoing, your Affiant submits SHABAZZ personally used and controlled the SHABAZZ Instagram, Facebook, and Google accounts.

YouTube Searches and Initial Purchase of COVID Vaccination Cards

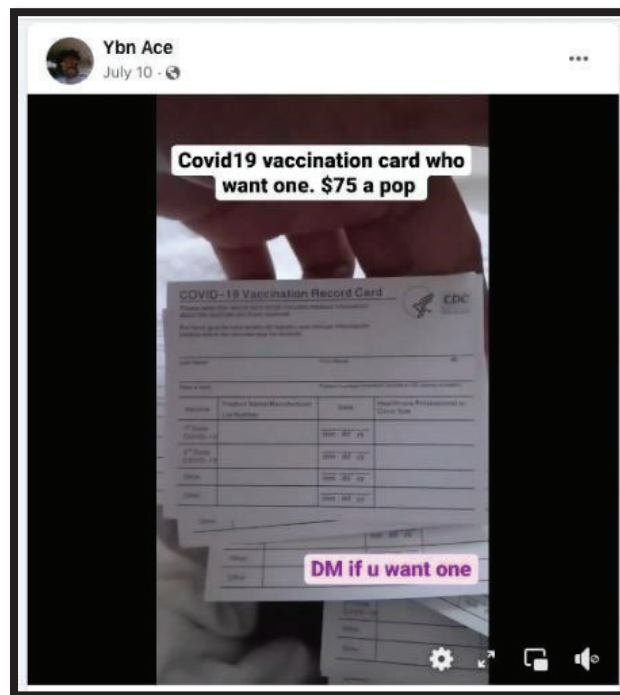
15. On June 10, 2021, a YouTube video search for “fake covid vaccination record card” was conducted using the SHABAZZ Google account. Within minutes after the search, videos of NBC News stories titled “Fake Covid Vaccination Cards Circulating In Online Forums” and “Scammers Work To Sell Fake Covid Vaccination Cards Online” were watched. On June 13, 2021, additional YouTube video searches were conducted using search terms “vaccination record card” and “vaccination record card fraud.”

16. On June 14, 2021, a \$15.80 debit from DHgate posted to an M&T Bank checking account in the name of Amar Salim SHABAZZ (the “SHABAZZ M&T account”). On the next day, an international shipment assigned tracking number LY804262370CN was accepted and processed through a facility in China. The shipment was addressed to “MAR S”⁷ and was said to contain 20 “PAPER CARDS524456257.” The recipient’s contact phone number was the SHABAZZ T-Mobile number.

17. DHgate is a Chinese online wholesale marketplace which your Affiant is aware publicly offered for sale, among other items, fraudulent COVID vaccination cards. DHgate vendors sold fraudulent vaccination cards at prices ranging from less than \$1 per card to approximately \$2 each. However, significant discounts were available when purchased in bulk. Shipping options commonly offered by DHgate vendors include DHL, FedEx, UPS and other services involving the U.S. Postal Service (USPS).

⁷ Your Affiant submits there is cause to believe that “MAR S” is in fact Amar SHABAZZ.

18. On July 10, 2021, the aforementioned shipment with tracking number LY804262370CN was delivered by the USPS to 95 Gwynnswood Rd., Owings Mills, Maryland 21117 (the “Owings Mills residence”). That evening, a nine-second video was posted on the SHABAZZ Instagram account showing an individual flipping through multiple COVID vaccination cards. The words “Covid19 vaccination card who want one. \$75 a pop” and “DM⁸ if u want one” were displayed on the video. The same nine-second video was also posted on the SHABAZZ Facebook account, as depicted in the screen capture below:

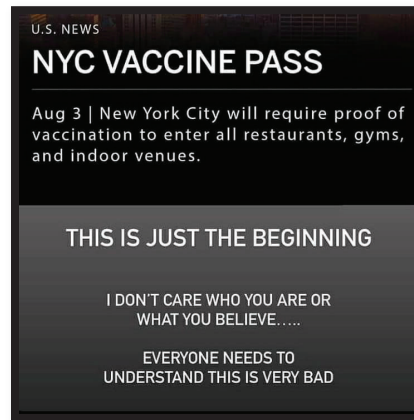
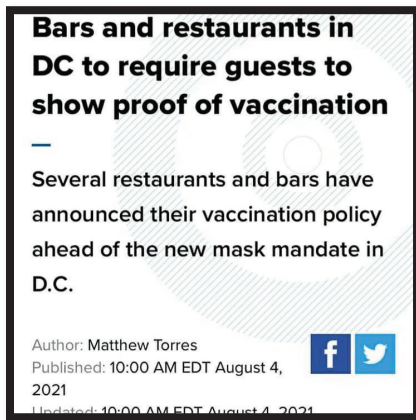


SHABAZZ’s Social Media Posts and Bulk Purchase of Fraudulent Cards in August 2021

19. On August 5, 2021, a news article titled “Bars and restaurants in DC to require guests to show proof of vaccination” was posted by an Instagram user on their page. On the same day, SHABAZZ posted the comment “I SELL PROOF OF VACCINATION CARDS” in the comments section of the post.

⁸ Your Affiant understands “DM” to be an abbreviation used to mean “Direct Message.”

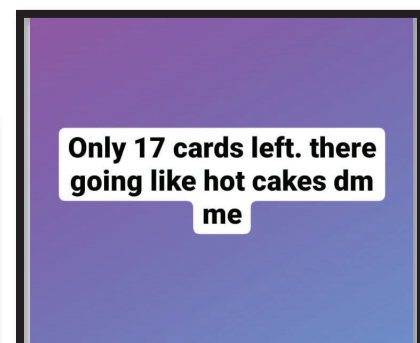
20. Less than 30 minutes later, the following three photos were posted to both the SHABAZZ Instagram and Facebook accounts, the first one being the same aforementioned news article:



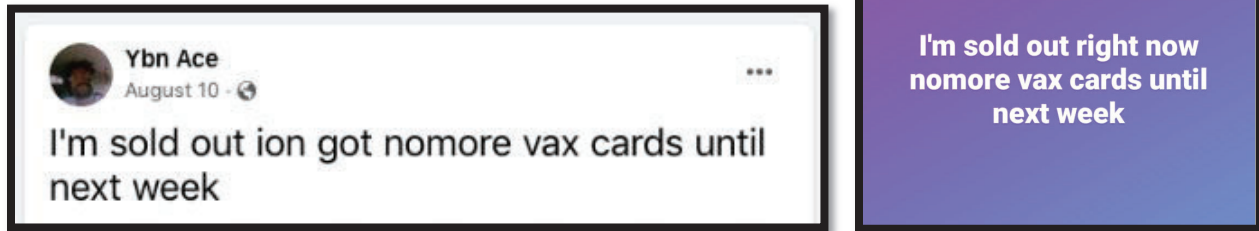
Each of the photos were associated with the statement: “Who need a vaccination card to bypass the bs they starting to do with our "freedom". DM NOW FOR PRICE ✓💯.”

21. Later that day, a YouTube search of “proof of vaccination” was conducted using the SHABAZZ Google account and a CNBC video titled “N.Y.C. to require proof of vaccination for indoor dining, concerts and gyms” was watched. Within seconds of the video being watched, the comment “I SELL VACCINATION CARDS” was posted in the comments section of the same video.

22. On August 6, 2021 and August 7, 2021, the following were posted on the SHABAZZ Facebook and Instagram accounts, respectively:



23. A few days later, on August 10, 2021, the following appeared on the same accounts:



24. That same day, a \$130 debit from DHgate posted to the SHABAZZ M&T account. In the evening, the following messages were sent between SHABAZZ and Person A through Instagram:

SHABAZZ:	Made 300 today
SHABAZZ:	I'm sold out
Person A:	Ohh
SHABAZZ:	Just bought 500 more cards
SHABAZZ:	60x500 is \$30k
Person A:	Tru
SHABAZZ:	I'm gonna be rich

Your Affiant has reason to believe the conversation above was in reference to SHABAZZ's earlier bulk purchase of fraudulent COVID vaccination cards through DHgate and his anticipated proceeds from its subsequent sale.

25. On August 12, 2021 and August 13, 2021, additional YouTube video searches were conducted through the SHABAZZ Google account using the terms "selling vaccination cards" and "covid scams." YouTube videos with the following titles were watched as a result of the searches conducted:

- "Fake vaccine cards hit the black market CNBC Television"
- "Feds: Naturopathic Physician Sold Fake COVID-19 Vaccine Cards NBC Bay Area"

- “Bar Owner Accused Of Selling Fake COVID Vaccine Cards CBS Sacramento”
- “State cracks down on fake vaccine cards NewsChannel 5”
- “Fake Covid-19 Vaccines: What to Know About Counterfeit Shots Sold Online | WSJ Wall Street Journal”

26. In addition to the videos listed above, an NBC News video titled “Scammers Work To Sell Fake Covid Vaccination Cards Online” was also watched. Within minutes after the video was viewed, the following were posted in the comments section of the video using the SHABAZZ Google account:

<u>Published Time</u>	<u>Text</u>
2021-08-13 04:38:33 UTC	Hmu ⁹ Instagram @ybn_ace_
2021-08-13 04:39:44 UTC	Hmu @ybn_ace_ Instagram I got them
2021-08-13 04:39:52 UTC	Hmu @ybn_ace_ Instagram I got them
2021-08-13 04:40:18 UTC	Hmu @ybn_ace_ Instagram I got them

27. On August 14, 2021, Person A sent SHABAZZ, through Instagram, a photo of a television news story pertaining to an individual arrested at an airport due to a fake COVID vaccination card. The following messages between SHABAZZ and Person A ensued:

Person A:	One of ya ppl got in trouble lmao , fck tht

SHABAZZ:	Oh shit
SHABAZZ:	I wonder how they got caught tho yo

Person A:	Better hope he dnt tell em where he got it from
SHABAZZ:	Ion think that’s my card tho

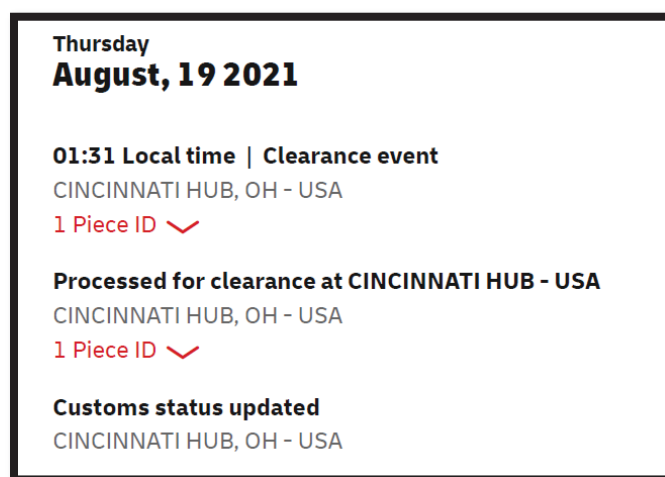
⁹ Your Affiant understands “Hmu” to be an abbreviation used to mean “hit me up.”

SHABAZZ: That shit look like paper
Person A: Wat ya card look like?
SHABAZZ: Index
Person A: Lemme see
SHABAZZ: I'm outraged stock
SHABAZZ: Outta *

Seizure of DHL Shipment Containing 503 Fraudulent COVID Vaccination Cards

28. On August 19, 2021, CBP Officers at the DHL International Facility in Erlanger, Kentucky examined an international shipment assigned tracking number 8216896461. The shipment originated from Hong Kong and was addressed to “MAR SHA”¹⁰ at the Owings Mills residence. The recipient’s contact phone number was the SHABAZZ T-Mobile number. The shipment was said to contain 500 “paper cards.” Upon examination, CBP Officers found the shipment to actually contain 503 COVID vaccination cards, determined them to be fraudulent and seized the shipment.

29. On August 19, 2021, the day the DHL shipment was examined by CBP, the following status updates pertaining to the shipment were viewable on DHL’s website by anyone who had the shipment tracking number:

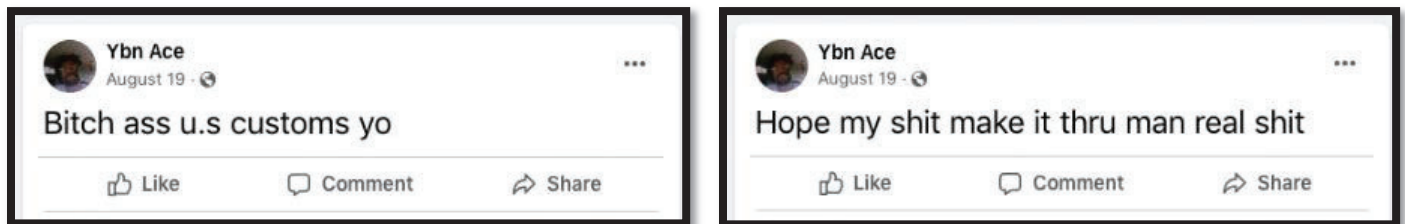


¹⁰ Your Affiant submits there is cause to believe that “MAR SHA” is in fact Amar SHABAZZ.

30. On the same day, the following YouTube video searches were conducted using the SHABAZZ Google account and the following videos were watched:

- Searched for: “customs inspection packages VACCINATION cards”
 - Watched: “FBI investigating fake vaccination cards WWLP-22News”
 - Watched: “Counterfeit vaccination cards found WKRN News 2”
- Searched for: “us customs VACCINATION cards”
- Searched for: “clearance event dhl”
 - Watched: “***SOLVED** DHL CUSTOMS CLEARANCE EVENT ***ESCAPE PLAN*** FULL PROCESS. CUSTOMS SEIZED. EASY PROCESS”
 - Watched: “If my parcel is seized by Customs what should i do? DHgate”

31. SHABAZZ additionally posted the following on the SHABAZZ Facebook account:



32. On August 24, 2021, DHL received a phone call from the SHABAZZ T-Mobile number. According to a recording of the call, the caller identified himself as “Amar” and stated he was calling regarding a DHL shipment with tracking number 8216896461, the seized shipment containing the fraudulent COVID vaccination cards. When asked for his phone number and address, “Amar” provided DHL with the SHABAZZ T-Mobile number and the Owings Mills residence, respectively.

33. On the same day, law enforcement replaced the original contents of the seized DHL shipment - the 503 fraudulent COVID vaccination cards - with the box of disposable face masks and two individually packaged face masks depicted below:



Your Affiant placed discreet markings on each of the items, repackaged the shipment, and placed the shipment outside the front door of the Owings Mills residence.

34. Later that evening, the following messages were sent between SHABAZZ and Person A through Instagram:

SHABAZZ:	My mom got my cards in her mailbox and she ain't tryna give it to me
Person A:	Lmao
Person A:	She tired of you sellin fake stuff and getting yaself in trouble.
SHABAZZ:	Real shit yo
SHABAZZ:	Idgaf ¹¹ bout nun of that shit yo
Person A:	His home

¹¹ Your Affiant understands "Idgaf" to be an abbreviation used to mean "I don't give a fuck."

SHABAZZ: I need my shit and I'm heated

SHABAZZ: Neva got caught from tht shit

35. On the next day, SHABAZZ sent a 14-second video through an Instagram message to multiple individuals. In the video, SHABAZZ stated: "Can you believe this man? I opened up the fuckin' pack yo. Look yo. I got masks yo. No fuckin' cards. I got masks yo. Shit crazy yo." while displaying the box of disposable face masks and two individually packaged face masks depicted in the screen capture below:



36. Seconds after sending the video, SHABAZZ sent the following additional messages:

SHABAZZ: I got some fucking mask

SHABAZZ: Shit UNBELIEVABLE

SHABAZZ: I mad as hell yo smh¹² I paid \$130¹³ wtf

¹² Your Affiant understands "smh" to be an abbreviation used to mean "shaking my head."

¹³ As aforementioned above, a \$130 debit from DHgate posted to the SHABAZZ M&T account on August 10, 2021.

SHABAZZ: I was waiting for my cards to come and I got u a bunch of mask instead

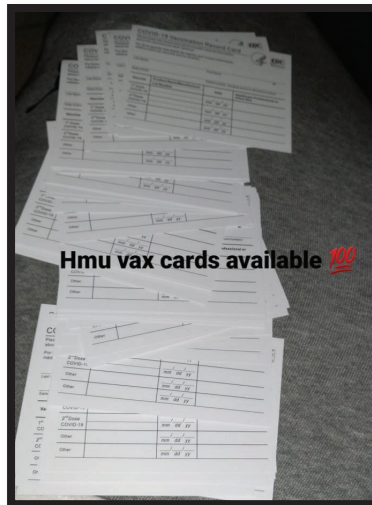
37. Your Affiant submits the box of disposable face masks and the two individually packaged face masks depicted in SHABAZZ's video are visually identical to the items your Affiant replaced the contents of the seized DHL shipment with. In addition, as further detailed below, during a search of the Owings Mills residence on October 1, 2021, the box of disposable face masks was located in a basement bedroom used by SHABAZZ and was found to contain the same discreet markings your Affiant had placed.

Additional Purchases of Fraudulent COVID Vaccination Cards

38. On August 26, 2021, a \$68.57 debit from DHgate posted to the SHABAZZ M&T account. On the following day, an international shipment assigned DHL tracking number 1044166863 was picked up and processed through at a facility in Hong Kong. The shipment was addressed to "ACE BOOGIE," but listed the SHABAZZ T-Mobile number as the recipient's telephone number. The shipment was said to contain 50 "STICKERS" and was delivered by DHL to the Owings Mills residence on August 31, 2021 at 11:57 AM.

39. On August 31, 2021, at 1:07 PM, another international shipment assigned tracking number LY850819903CN was delivered by USPS to the Owings Mills residence. The shipment originated from China, was addressed to "MAR S," and listed the SHABAZZ T-Mobile number as the recipient's contact phone number. The shipment was said to contain "PAPER CARD."

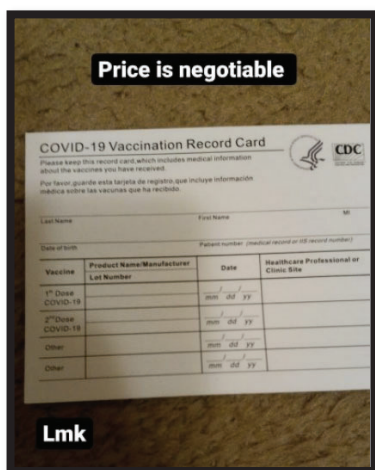
40. That evening, after the DHL and USPS shipments had been delivered, the following was posted to the SHABAZZ Instagram account:



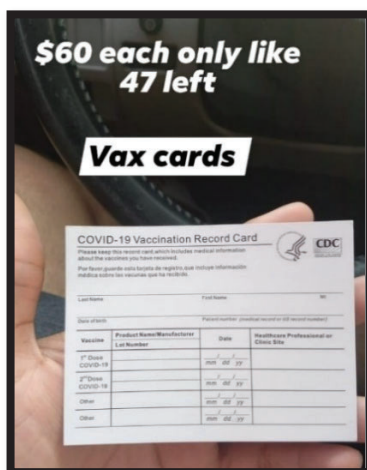
41. Minutes after the post, Person A sent SHABAZZ, through Instagram, an NPR news article titled “Fake COVID Vaccine Cards Are Being Sold Online. Using One Is A Crime.” In response, SHABAZZ stated:

Sent 2021-08-31 23:17:49 UTC
Body Fuck the 🚗

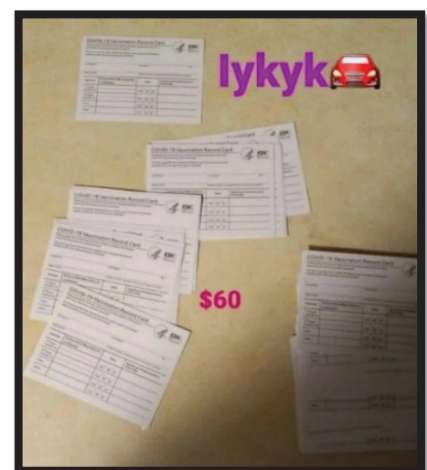
42. Throughout September 2021, SHABAZZ continued to offer the sale of fraudulent COVID vaccination cards through multiple posts on the SHABAZZ Instagram account, including the following on the dates indicated:



September 4, 2021



September 13, 2021



September 23, 2021

Examination of DHL Shipment in September 2021

43. On September 14, 2021, the following YouTube video searches were conducted through the SHABAZZ Google account and the following videos were watched:

- Searched for: “documents dhgate”
- Searched for: “vax cards”
 - Watched: “How to spot a fake COVID-19 vaccine card WUSA9”
 - Watched: “Are Counterfeit Vaccination Cards the Next Big Scam? Inside Edition”

44. Two days later, Person A sent SHABAZZ, through Instagram, a photo of a WebMD article titled “Two Women Charged in Fake COVID Vaccination Card Scam.” Visible in the photo was information indicating one of the defendants had sold approximately 250 fraudulent vaccination cards for \$200 each. Shortly thereafter, SHABAZZ responded with multiple voice messages in which he stated, not verbatim, the following:

At 8:17 PM: Yo what the fuck? Yo they selling them bitches for 200 a pop?
God damn! Yo I know they eatin yo!

At 8:17 PM: 200 a pop times 250? Yo that’s bank yo! I’m gonna raise my
prices up yo.

At 8:18 PM: Yo, 200 a pop times 250 is 50 racks. I know-I know already-I
[unintelligible] probably sold that much already but I could’ve had
50 thousand dollars yo?

At 8:18 PM: Yo real shit yo. I’m raising my price today, starting today, man.
Real shit yo. Yo, no more 60 a piece yo.¹⁴ I want that 200 a piece
yo! Yo they makin’ cheese yo!

¹⁴ As displayed above in the Instagram posts on September 13, 2021 and September 23, 2021, SHABAZZ was offering the sale of fraudulent COVID vaccination cards for \$60 each during this time period.

45. On September 20, 2021, a \$68.57 debit from DHgate posted to the SHABAZZ M&T account. On the following day, an international shipment assigned DHL tracking number 3298397465 was picked up and processed through a facility in Hong Kong. The shipment was addressed to “KEVIN ANDERSON,”¹⁵ but listed the SHABAZZ T-Mobile number as the recipient’s telephone number. The shipment was said to contain “CHRISTMAS DECORATION.”

46. On September 23, 2021, the DHL shipment was intercepted and upon examination, was found to actually contain 51 fraudulent COVID vaccination cards. Your Affiant placed discreet markings on each of the fraudulent COVID vaccination cards, repackaged them and released the shipment to DHL for delivery to the intended address. The shipment was delivered by DHL to the Owings Mills residence on the evening of September 24, 2021.

SHABAZZ’s Distribution of COVID Vaccination Cards Through UPS

47. SHABAZZ sold multiple fraudulent COVID vaccination cards to individuals he met and communicated with through social media. In each of the instances further detailed below, SHABAZZ went to The UPS Store in Owings Mills, Maryland (the “Owings Mills UPS Store”) and shipped the fraudulent COVID vaccination cards through UPS, a commercial interstate carrier. SHABAZZ used the name “Kevin Anderson” as the sender for each of the shipments below.

The 9/10/2021 UPS Shipment to M.V.

48. On September 10, 2021, the following searches were conducted using the SHABAZZ Google account:

At 5:56 PM: “ups owings mills”

At 6:32 PM: “does ups look inside packages”

¹⁵ As further detailed below, the name “Kevin Anderson” was also used on UPS shipments SHABAZZ sent to individuals he sold fraudulent COVID vaccination cards to and also on a Venmo account used in furtherance of the fraud.

49. At 6:37 PM that same evening, a debit card in the name of Amar Salim SHABAZZ and ending in 4683¹⁶ (“the SHABAZZ M&T debit card”) was used at the Owings Mills UPS Store for the purchase of a mailer envelope. Thirteen minutes later, the SHABAZZ M&T debit card was used again at the same UPS store to pay shipping costs related to a shipment sent via UPS from “KEVIN ANDERSON” and intended for M.V., an individual residing in New Jersey.

50. When interviewed by law enforcement, M.V. stated she purchased a COVID vaccination card from an individual she communicated with through Instagram, an individual using the SHABAZZ Instagram account. M.V. became aware of the SHABAZZ Instagram account after watching a YouTube video about COVID vaccines and vaccination cards and observing a comment in the comments section of the video directing individuals seeking COVID vaccination cards to the SHABAZZ Instagram account. M.V. sent a message to the SHABAZZ Instagram account shortly thereafter. M.V. was instructed to send payment for the vaccination card, in the amount of \$75, to a CashApp account owned by Person A. Approximately 2-3 days after the order was placed, M.V. received a UPS shipment containing the COVID vaccination card she ordered and one additional card. M.V. provided law enforcement with the two vaccination cards she received, which were determined to be fraudulent.

The 9/17/2021 UPS Shipment to D.W.

51. On September 17, 2021, at 4:27 PM, the SHABAZZ M&T debit card was used at the Owings Mills UPS Store for the purchase of a mailer envelope. Later, at 4:34 PM and 4:55 PM, SHABAZZ withdrew \$15 from the SHABAZZ M&T account through two transactions, both at an ATM located near the Owings Mills UPS Store. Surveillance videos show SHABAZZ conducting

¹⁶ A debit card ending in 4683 was issued by M&T Bank and linked to the SHABAZZ M&T account.

the transactions. At 5:04 PM, a shipment was sent through the Owings Mills UPS Store from “KEVIN ANDERSON” and intended for D.W., an individual residing in North Carolina. The UPS shipping costs were paid for with \$15 in cash.

52. When interviewed by law enforcement, D.W. stated he purchased two COVID vaccination cards from an individual he originally learned of through YouTube but later communicated with through Instagram. The individual with whom D.W. communicated used the SHABAZZ Instagram account. D.W. was originally instructed to send payment for the vaccination cards, in the amount of \$100, to a CashApp account owned by Person A. However, an error was encountered and payment was ultimately sent through Venmo. Venmo records indicate the \$100 was received into an account currently in the name of “kevin Anderson.”¹⁷ However, SHABAZZ’s date of birth, social security number, and the SHABAZZ T-Mobile number are associated to the account. Immediately after the \$100 was received into the “kevin Anderson” Venmo account, \$98.50 was paid-out and deposited into the SHABAZZ M&T account.

53. D.W. provided law enforcement with the two COVID vaccination cards he received, which were determined to be fraudulent. D.W. also provided law enforcement with the envelope used to ship the vaccination cards he received. The envelope contained a UPS shipping label which indicated the shipment was sent by “KEVIN ANDERSON” through the Owings Mills UPS Store.

The 9/28/2021 UPS Shipment to S.E.

54. On September 28, 2021, at 5:31 PM, the SHABAZZ M&T debit card was used at the Owings Mills UPS Store for the purchase of a mailer envelope. At 5:44 PM, an ATM withdrawal in the amount of \$15 was conducted from the SHABAZZ M&T account at an ATM located near

¹⁷ Venmo records indicate the account holder name for the Venmo account was changed on September 17, 2021 from “mar s” to “kevin Anderson.”

the Owings Mills UPS Store. Surveillance video shows SHABAZZ conducting the transaction. At 5:50 PM, a shipment was sent through the Owings Mills UPS Store from “KEVIN ANDERSON” and intended for S.E., an individual residing in Illinois. The UPS shipping costs were paid for with \$15 in cash.

55. When interviewed by law enforcement, S.E. stated he purchased a COVID vaccination card from an individual he became aware of through YouTube but later communicated with through Instagram. On September 28, 2021, \$70 was paid from a Venmo account associated to S.E. and received into the “kevin Anderson” Venmo account. Shortly thereafter, \$68.95 was paid-out and deposited into the SHABAZZ M&T account.

56. S.E. provided law enforcement with the COVID vaccination card he received, which was determined to be fraudulent. In addition, the fraudulent vaccination card S.E. received contained the same discreet markings your Affiant placed on the fraudulent vaccination cards found within the DHL shipment intercepted and examined on September 23, 2021.

Search Warrants Executed on October 1, 2021

57. On September 30, 2021, the Honorable Thomas M. DiGirolamo of the United States District Court for the District of Maryland issued multiple warrants related to this investigation, including warrants authorizing the search of the Owings Mills residence¹⁸ and a Lexus vehicle owned by SHABAZZ¹⁹ (“SHABAZZ’s Lexus”).

58. The next morning, law enforcement conducted a search of the Owings Mills residence pursuant to the warrant issued. SHABAZZ was present at the time of the search, along with his

¹⁸ See Warrant # 1:21-mj-2727 TMD.

¹⁹ See Warrant# 1:21-mj-2729 TMD.

mother and two other individuals. Within the basement of the Owings Mills residence was a furnished bedroom and half-bathroom. The basement bedroom contained clothing, a television and gaming system, cellular telephones, and other items indicative of current occupancy. On a nightstand next to the bed, law enforcement located SHABAZZ's Maryland driver's license and the SHABAZZ M&T debit card. Within a closet in the basement, law enforcement located numerous handwritten notes, including the ones detailed above titled "Rap Name: Ace YBN," "Things Im doing when I get out (updated)," "Different options," and "SCAM Life/Legit."

59. At the time of the search, SHABAZZ's Lexus was parked in front of the Owings Mills residence. Within the center console, between the driver's seat and passenger seat, law enforcement located 86 fraudulent COVID vaccination cards. 46 of the fraudulent vaccination cards contained the discreet markings your Affiant placed on the vaccination cards found within the DHL shipment intercepted and examined on September 23, 2021.

60. Also located within SHABAZZ's Lexus were two receipts from the Owings Mills UPS Store. The receipts pertained to payments for UPS shipping costs related to the shipments sent to M.V. in New Jersey and D.W. in North Carolina, both shipments which contained fraudulent COVID vaccination cards.

61. On October 1, 2021 and October 2, 2021, after the searches of the Owings Mills residence and SHABAZZ's Lexus were completed, multiple Google searches were conducted through the SHABAZZ Google account, including searches using the terms:

- "vaccine card sentence"
- "fake covid19 cards penalties"
- "vaccination cards fraud penalty"

Statements Made by SHABAZZ through Social Media

62. On October 3, 2021, the following messages were sent between SHABAZZ and Person B through Instagram:

SHABAZZ:	The feds kicked in my door on Friday I might be going to jail soon hopefully not
Person B:	For what lol
SHABAZZ:	The vaccination cards
SHABAZZ:	They took everything my id my credit card & my tags ...ion got shit now
Person B:	Ni[**]a why would you do that now they finna lock you up
SHABAZZ:	Smh idek ²⁰ man I'm getting a lawyer hopefully tomorrow
SHABAZZ:	And I'm on probation
SHABAZZ:	I can't say too much on here but that shit was dumb jai
Person B:	I could've told you that one
SHABAZZ:	Yeah smh 🙄

63. On October 5, 2021, the following messages were sent between SHABAZZ and Person C through Instagram:

SHABAZZ:	I'm facing federal time

Person C:	What u mean fed time
SHABAZZ:	Dumbass vaccination cards

Person C:	What they even charging u wit
SHABAZZ:	Idk yet but I think it's sending it thru the mail and possession

²⁰ Your Affiant understands "idek" to be an abbreviation used to mean "I don't even know."

SHABAZZ's Obstruction of Justice

64. As detailed above, law enforcement executed federal search warrants relating to this investigation on October 1, 2021. To your Affiant's knowledge, SHABAZZ was unaware of the investigation prior to this date. In the days immediately thereafter, SHABAZZ engaged in multiple acts which your Affiant submits constitutes efforts to obstruct the investigation being conducted.

65. On October 2, 2021, a Google search for "dhgate delete account" was conducted using the SHABAZZ Google account and a website titled "How To Delete DHGate Account | Cancel Account – LOGINHIT" was visited.

66. On October 3, 2021, at 03:05 AM, Facebook records indicate the username associated to the SHABAZZ Instagram account was changed from "ybn_ace_" to "ybnace7x" by a device using internet protocol version 6 (IPv6) address 2607:fb90:1819:047c:5cb1:d8d9:754c:1a12. T-Mobile records reflect the IPv6 network address was assigned to the SHABAZZ T-Mobile number on the date and time the username was changed. As discussed above, SHABAZZ had directed individuals seeking COVID vaccination cards to contact him on Instagram at username "ybn_ace_." SHABAZZ, in fact, communicated with individuals he ultimately sold fraudulent vaccination cards to through the Instagram account.

67. On October 3, 2021, at 08:41 PM, Google records indicate the SHABAZZ Google account was deleted by a device using IPv6 address 2607:fb90:64ea:6aa5:c5bc:cc6:c759:3479. T-Mobile records reflect the IPv6 network address was assigned to the SHABAZZ T-Mobile number on the date and time the SHABAZZ Google account was deleted. As detailed within this affidavit, SHABAZZ extensively used the Google account he then deleted to facilitate and further the fraud scheme, including by: 1) posting comments on YouTube videos advertising the sale of COVID vaccination cards, 2) directing YouTube users seeking COVID vaccination cards to contact him at

the SHABAZZ Instagram account, 3) conducting Google and YouTube searches pertaining to fraudulent COVID vaccination cards and its sale, 4) researching penalties for fraud involving COVID vaccination cards, and 5) researching how to delete other accounts he used in furtherance of the fraud.

68. Your Affiant submits the records and information contained within the Google account, including information pertaining to the account's use, is relevant and material to an official federal investigation, *to wit*, the investigation being conducted by HSI, USPIS, and HHS-OIG into SHABAZZ for the offenses and conduct detailed within this affidavit.

CONCLUSION

69. Based upon the foregoing, your Affiant submits there is probable cause to believe that violations of Mail Fraud (18 U.S.C. § 1341) and Obstruction of Justice (18 U.S.C. § 1519) have been committed and that SHABAZZ committed them. Accordingly, your Affiant makes this affidavit in support of a Criminal Complaint charging Amar Salim SHABAZZ with one count each of the aforementioned criminal offenses.

The foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

Digitally signed by
Michael Shao
Date: 2021.11.22 15:53:14
-05'00'

Michael Shao
Special Agent
Homeland Security Investigations (HSI)

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with
Fed. R. Crim. P. 4.1 this 24th day of November, 2021.

A. David Copperthite
HON. A. DAVID COPPERTHITE
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MARYLAND