AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jenchira Vogel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the U.S. Department of Labor, Office of Inspector General ("DOL-OIG"), and have served in this capacity since February 2018. I am presently assigned to the Washington Regional Office of DOL-OIG, which encompasses an area of investigative responsibility including Maryland, Washington, D.C., and the Eastern District of Virginia. Prior to my employment with DOL-OIG, I investigated visa fraud as an Investigative Analyst with the U.S. Department of State, Bureau of Diplomatic Security, and prescription drug trafficking as a Diversion Investigator with the U.S. Department of Justice, Drug Enforcement Administration. I am a graduate of Boston University in Boston, Massachusetts; the Diversion Investigator Training Program at the DEA Academy in Quantico, Virginia; and the Criminal Investigator Training Program and Inspector General Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. As a DOL-OIG special agent, I conduct criminal investigations into unemployment insurance ("UI") fraud, identity theft, mail and wire fraud, as well as other related criminal offenses. Through my training and experience, I have become familiar with the methods used by individuals who commit benefit fraud offenses.

PURPOSE OF AFFIDAVIT

2. I make this affidavit in support of a criminal complaint against **Jerry Phillips** for wire fraud and aggravated identity theft, in violation of 18 U.S.C. §§ 1343, 1028A, and against **Jaleel Phillips** for wire fraud, in relation to an alleged scheme to unlawfully obtain loans and unemployment benefits related to the ongoing Coronavirus Disease 2019 ("COVID-19") pandemic.

3. The facts set forth in this affidavit are based upon my training and experience, my personal knowledge of this investigation, my review of records and documentation, and information provided to me from others, including other law enforcement agencies, multiple state workforce agencies, and financial institutions. This affidavit is intended to show merely that there is probable cause to believe that the defendants committed the above-named criminal offenses, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only. Finally, all dates and times referenced throughout the affidavit are approximate.

OVERVIEW

The Paycheck Protection Program

4. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in March 2020 designed to provide emergency financial assistance to the millions of Americans who were suffering from the economic consequences of COVID-19.

5. The CARES Act authorized up to $659 billion in forgivable loans to small businesses for employee retention and certain business expenses through a program called the Paycheck Protection Program ("PPP").

6. The program authorized qualifying small businesses and other organizations to receive loans that are 100 percent guaranteed by the Small Business Administration ("SBA"), and the full principal amount of the loans may qualify for loan forgiveness. The business must use PPP loan proceeds on payroll costs, mortgage interest, rent, and utilities. Initially, the program allowed the principal to be forgiven if the business spent the loan proceeds on qualifying expenses within eight weeks of loan issuance and used at least 75 percent of the loan

for payroll. On June 5, 2020, the Paycheck Protection Program Flexibility Act of 2020 went into effect. This law extended the period from eight weeks to 24 weeks in which the loan proceeds had to be spent and reduced the requirement that the loan proceeds be spent on payroll from 75 percent to 60 percent.

7. The loan recipient's number of employees and average monthly payroll costs for the 12-month period prior to the disaster determined the amount of PPP funding that the business would receive. Businesses applying for a PPP loan provided documentation showing their payroll expenses.

8. To qualify for eligibility, businesses applying for a PPP loan needed to be in operation as of February 15, 2020.

9. The SBA administered the program and had authority over all PPP loans. However, approved lenders (usually private banks and credit unions) issued the loans. The lenders received and processed PPP applications and supporting documentation, then made the loans using their own funds.

10. The Paycheck Protection Program ended on May 31, 2021.

Economic Injury Disaster Loan

11. An Economic Injury Disaster Loan ("EIDL") is an SBA-administered loan designed to provide assistance to small businesses that suffer substantial economic injury as a result of a declared disaster. An EIDL helps businesses meet necessary financial obligations that could have been met had the disaster not occurred. It provides relief from economic injury that the disaster caused and permits businesses to maintain a reasonable working capital position during the period that the disaster affected.

12. Additionally, the SBA offers an EIDL advance that is designed to provide emergency economic relief to businesses that are currently experiencing a temporary loss of revenue. This advance will not have to be repaid, and small businesses may receive an advance even if they are not approved for an EIDL loan. The maximum advance amount is $10,000. The amount of the loan offered as well as the advance amount are determined by the SBA based on the information provided on the loan application.

13. EIDL funds are issued directly from the United States Treasury, and applicants apply through the SBA via an online portal. The EIDL application process, which also uses certain outside contractors for system support, collects information concerning the business and the business owner, including information as to the gross revenues for the 12 months prior to the disaster; the cost of goods sold; and information as to any criminal history of the business owner. Applicants electronically certify that the information provided is accurate and are warned that any false statement or misrepresentation to the SBA or any misapplication of loan proceeds may result in sanctions, including criminal penalties.

14. In March 2020, due to the COVID-19 pandemic, the SBA issued an Economic Injury Disaster Loan declaration. The declaration made EIDL loans available nationwide to small businesses to help alleviate economic injury caused by COVID-19. EIDL loans are usually limited to a maximum amount of $2 million. However, during the COVID-19 pandemic, EIDL loans were limited for a period of time to $150,000. On April 6, 2021, the SBA raised the loan limit for the COVID-19 EIDL program from 6-months of economic injury with a maximum loan amount of $150,000 to up to 24-months of economic injury with a maximum loan amount of $500,000. On September 9, 2021, the SBA returned to the previous maximum loan amount of $2 million.

Unemployment Insurance

15. Unemployment Insurance ("UI") is a state-federal program that provides monetary benefits to eligible lawful workers. Although state workforce agencies ("SWAs") administer their respective UI programs, they must do so in accordance with federal laws and regulations. UI payments ("benefits") are intended to provide temporary financial assistance to lawful workers who are unemployed through no fault of their own. Each state sets its own additional requirements for eligibility, benefit amounts, and length of time benefits can be paid. Generally, UI weekly benefit amounts are based on a percentage of wages earned over a base period.

16. After an SWA processes a claim for benefits, payments are often paid to the claimant in one of two ways: (a) by direct deposit to a preexisting account or (b) by prepaid debit card. A financial institution, pursuant to a contract with the state government, typically mails a prepaid debit card to the address provided by the claimant in his or her application for benefits. The SWA subsequently authorizes the application of benefits to the debit card account and continues to do so on a periodic basis as long as the claimant continues to file for benefits.

17. In Massachusetts, the SWA responsible for oversight of the UI program is the Department of Unemployment Assistance (MA DUA). In Michigan, the SWA responsible for oversight of the UI program is the Department of Labor and Economic Opportunity (MI DLEO). In Washington, D.C., the SWA responsible for oversight of the UI program is the Department of Employment Services (DC DOES). UI benefits from MA DUA, MI DLEO, and DC DOES can be applied either to a prepaid debit card account or credited through direct deposit to a claimant's financial account, which is established when the claimant provides their financial institution's routing number and their own personal account number at the time they make their initial

application for benefits. In instances where the claimant elects to receive UI benefits through a prepaid debit card, benefits are credited to prepaid debit cards issued pursuant to contracts between each state and the following entities:

a. MA DUA and MI DLEO UI benefits are credited to prepaid debit cards issued by Bank of America ("BOA"); and

b. DC DOES UI benefits are credited to prepaid debit cards issued by US Bank.

18. UI prepaid debit cards maintain unique card numbers and are issued in the claimant's name. The cards only allow for the credit of UI benefits, but the debit cards can be used to make purchases at merchants or online, and UI benefit funds may be transferred to another financial institution. Claimants can also withdraw UI benefit funds from the prepaid debit cards in cash from automated teller machines ("ATMs").

19. MA DUA, MI DLEO, and DC DOES, through BOA and US Bank respectively, mail debit cards via the United States Postal Service ("USPS"), or through commercial carriers such as UPS and FedEx, to the mailing address provided on the application for benefits.

CARES ACT UI PROGRAMS

20. In addition to the SBA Loan programs described above, the CARES Act expanded states' ability to provide UI benefits for many workers impacted by COVID-19, including for workers who are not ordinarily eligible for UI benefits. The CARES Act provided for three new UI programs: Pandemic Unemployment Assistance ("PUA"); Pandemic Emergency Unemployment Compensation ("PEUC"); and Federal Pandemic Unemployment Compensation ("FPUC").

21. PUA provided for up to 39 weeks of benefits to individuals who were self-employed, seeking part-time employment, or who otherwise would not qualify for regular UI or

extended benefits under state or federal law or PEUC under section 2107 of the CARES Act. Coverage included individuals who had exhausted all rights to regular unemployment compensation or extended benefits under state or federal law or PEUC. Under the CARES Act PUA provisions, a person who was a business owner, self-employed worker, independent contractor, or gig worker could qualify for PUA benefits if he/she previously performed such work and was unemployed, partially unemployed, unable to work, or unavailable to work due to a COVID-19 related reason. A PUA claimant had to answer various questions to establish his/her eligibility for PUA benefits. The claimant had to provide his/her name, Social Security Number ("SSN"), and mailing address. The claimant also had to identify a qualifying occupational status and COVID-19 related reason for being out of work. The eligible timeframe to receive PUA ran for weeks of unemployment beginning on or after January 27, 2020, through December 31, 2020.

22. PEUC provided for up to 13 weeks of benefits to individuals who had exhausted regular UI under state or federal law, had no rights to regular UI under any other state or federal law, were not receiving UI under the UI laws of Canada, and were able to work, available for work, and were actively seeking work. States were required to offer flexibility in meeting the "actively seeking work" requirement if individuals were unable to search for work because of COVID-19, including because of illness, quarantine, or movement restriction. The timeframe covered by PEUC was unemployment during the approximate time period April 5, 2020 to December 31, 2020.[1]

23. FPUC provided individuals collecting regular UI, PEUC, PUA, and several other forms of unemployment compensation with an additional $600 per week. The eligible timeframe

[1] April 5, 2020 or the date after then when the state established an agreement with the federal government.

to receive FPUC was from April 5, 2020, until July 31, 2020. On August 8, 2020, after FPUC expired, the President signed a Presidential Memorandum authorizing FEMA to use disaster relief funds pursuant to Section 408 Other Needs Assistance of the Stafford Act to provide supplemental payments for lost wages to help ease the financial burden on individuals who were unemployed as a result of COVID-19. The "Lost Wages Assistance Program" ("LWAP") served as a temporary measure to provide an additional $300 per week via a total of $44 billion in FEMA funds. The period of assistance for LWAP was August 1, 2020 to December 27, 2020, or termination of the program, whichever was sooner.

24. On December 27, 2020, the Continued Assistance for Unemployed Workers Act of 2020 extended the period of coverage for COVID-19 unemployment benefits through March 14, 2021. It reauthorized FPUC at $300 per week in supplemental benefits for weeks of unemployment beginning after December 26, 2020, and ending on or before March 14, 2021. On March 11, 2021, the American Rescue Plan Act of 2021 extended the COVID-19 unemployment programs through September 4, 2021. These programs are no longer active.

PROBABLE CAUSE

25. **Jerry Phillips** and **Jaleel Phillips** are Maryland residents. From in or about February 2020 until in or about September 2020, Jerry and Jaleel Phillips resided at 2706 Afton Street, Temple Hills, Maryland. **Jaleel Phillips** is the owner of 2706 Afton Street, which is believed to currently be used as a rental property. **Jerry Phillips** shares the same birth date as **Jaleel Phillips,** and is believed to be **Jaleel Phillips'** twin brother.

26. As discussed further below, **Jaleel Phillips** was the registered account holder for Verizon IP address 96.241.193.39 during the time period February 7, 2020 through June 5, 2020, and the registered account owner for Verizon IP address 173.73.217.89 during the time period

June 6, 2020 through June 26, 2020. The account address of record was 2706 Afton Street, Temple Hills, Maryland. During these respective time periods, these IP addresses were used to apply for fraudulent PPP and EIDL loan applications, resulting in over $1 million in received funds, as well as multiple claims for unemployment insurance resulting in over $75,000 in benefits paid out of Washington, D.C., Michigan, and Maryland. Your affiant further has probable cause to believe that the personal identifying information of real persons was used in the fraudulent unemployment insurance claims.

Kenneth Williams

27. On May 25, 2020, an individual named Kenneth Williams applied for a PPP loan in the name of a purported business called Agro-America, Inc., listing himself as the primary contact for Agro-America, Inc. The email address kenswill81@gmail.com was used to apply for the loan. According to Google subscriber information, Kenneth Williams is the registered user of the kenswill81 email address.

28. On May 30, 2020, using the email address kenswill81@gmail.com, "Kenneth Williams" emailed Celtic Bank stating:

> "Hello, I recently applied and got approved and have received my funds. I have started the process of paying my employees, and my financial advisor just told me that the funds will still not be enough to cover their payroll FULLY. Which is not an issue at all. This loan will definitely be able to ease the worries their family has, along with keeping my business afloat during these hard times along with the riots and chaos. I was just hoping i would be able to get assistance in getting the loan Forgiven. Is there anyone im able to get in contact with to discuss this? Thank you for your time, and please be safe. –Kenneth Williams"

29. On the PPP borrower application form, Kenneth Williams stated that Agro-America, Inc., had an average monthly payroll of $121,633.20, with 41 employees. Investigators requested wage and hour information for Agro-America, Inc., for the years 2019 and 2020 from the state of Florida. Florida was unable to find any relevant wage and hour records.

Additionally, no associated tax returns were available for Agro-America, Inc., and the Florida business records that investigators found reflected that Agro-America, Inc., ceased operations on March 31, **2000**.

30. According to online records available from Florida, Agro-America, Inc., was registered in or about 1997, but the last filing event associated with this entity occurred on or about May 27, 2020. The address listed on the Florida Agro-America documents and the PPP loan for Agro-America was 3023 Southwest 133rd Court, Miami, Florida. The officer/director for Agro-America was listed in the Florida records as Gustavo Rodriguez. The name on the Form 941 submitted with the loan application was Kenneth Williams. Your affiant has found no evidence that Agro-America had any business operations from 2018 to the present.

31. On or about April 1, 2020, a Wells Fargo account ending in 0513 ("WF 0513"), was opened by Kenneth Williams. The initial $25 deposit came from Zelle, and more specifically from "Robinson Lawrence." The online application listed Williams' social security number ("SSN") as ending in 7104, his Maryland driver's license number as W452465014658, and a purported date of birth of 8/23/81. The address of record for WF 0513 was 2303 Brooks Drive, Apt. 304, Suitland, Maryland. The Maryland Motor Vehicle Administration ("MVA") has no record of a driver's license matching the purported driver's license number nor the name Kenneth Williams, with the listed date of birth. The Social Security Administration confirmed that the SSN being used for Kenneth Williams is not a valid SSN assigned to that name.

32. On May 20, 2020, Williams' WF 0513 received 10 deposits from the "MA Dua Cares Act," attributed to "Williams, Kenneth" and totaling $7,687. Based on my training and experience, your affiant recognizes this as the ACH transfer information for the Massachusetts Department of Unemployment Assistance. Shortly thereafter, on May 27, 2020, WF 0513

received a $304,083 deposit from Celtic Bank Bluevine in the name of Agro-America, Inc. The funds from Celtic Bank were proceeds of the PPP loan that Kenneth Williams applied for under the name of Agro-America, Inc.

33. Upon receipt of the PPP funds, Kenneth Williams began removing large amounts of money from WF 0513. Kenneth Williams transferred money to several individuals via Zelle, including to Lawrence Robinson.[2] Kenneth Williams caused ACH charges in favor of other individuals, incurred charges from vendors such as Verizon and T-Mobile, and made purchases, both online and in-person, including purchases at retailers such as Amazon and the Home Depot. Kenneth Williams also engaged in ATM withdrawals, including the following cash withdrawals from Wells Fargo ATMs:

5/21/20	$300	2845 Alabama Ave., SE, Washington DC
5/26/20	$300	2845 Alabama Ave., SE, Washington DC
5/26/20	$300	2845 Alabama Ave., SE, Washington DC
5/26/20	$300	2845 Alabama Ave., SE, Washington DC
5/26/20	$300	2845 Alabama Ave., SE, Washington DC
5/27/20	$300	2845 Alabama Ave., SE, Washington DC
6/3/20	$300	3200 Pennsylvania Ave., SE, Washington DC
6/4/20	$300	3050 Waldorf Marketplace, Waldorf, Maryland
6/5/20	$300	3200 Pennsylvania Ave., SE, Washington DC
6/8/20	$300	3200 Pennsylvania Ave., SE, Washington DC
6/8/20	$300	3050 Waldorf Marketplace, Waldorf, Maryland
6/10/20	$300	3050 Waldorf Marketplace, Waldorf, Maryland
6/11/20	$300	5801 Silver Hill Road, District Heights, Maryland
6/17/20	$300	3200 Pennsylvania Ave., SE, Washington DC
6/22/20	$300	2845 Alabama Ave., SE, Washington DC
6/22/20	$300	3200 Pennsylvania Ave., SE, Washington DC
6/22/20	$300	3200 Pennsylvania Ave., SE, Washington DC
6/24/20	$300	7423 Baltimore Ave., College Park, Maryland
6/25/20	$300	2845 Alabama Ave., SE, Washington DC
7/14/20	$300	6300 Central Ave., Seat Pleasant, Maryland
7/16/20	$300	3200 Pennsylvania Ave., SE, Washington DC

[2] As discussed further herein, your affiant has probable cause to believe Lawrence Robinson is an alias used by Jaleel Phillips.

Your affiant knows from her experience that a common maximum ATM cash withdrawal amount for Wells Fargo is $300.

34. During 2020, more than $70,000 was transferred from WF 0513 to a Robinhood Markets, Inc. ("Robinhood") account belonging to Kenneth Williams. On or about April 25, 2020, Kenneth Williams opened an account at Robinhood ending in 3792 ("Robinhood 3792"). Robinhood 3792 had an associated email address of Kenswill81@gmail.com, a listed date of birth of 8/23/81, and an address of 2706 Afton Street, Temple Hills, Maryland (where **Jerry Phillips** and **Jaleel Phillips** were then residing).

35. Robinhood 3792 was linked to a Wells Fargo account ending in 2730 ("WF 2730"), a Wells Fargo account ending in 4489 ("WF 4489"), and to WF 0513.[3] According to Robinhood 3792 records, all of these accounts were registered to Kenneth Williams. Robinhood 3792 had a card associated with it that allowed point of sale transactions. The card for Robinhood 3792 shows many purchases in Prince Georges County, Maryland, including significant amounts of money spent at Walmart, Home Depot, CVS, Lowes, and multiple restaurants. It also appears that the card was used to obtain cash at multiple locations throughout the Washington metropolitan area.

36. During 2020, more than $35,000 was transferred from WF 0513 to a Coinbase account belonging to Kenneth Williams. On May 27, 2020, an account bearing the name Kenneth Williams, and using kenswill81@gmail.com, was created at Coinbase, a digital currency exchange. The IP address used to open the account was 96.241.193.39, the Verizon IP address registered to **Jaleel Phillips**. Images of a purported Maryland driver's license bearing

[3] WF 2730 and WF 4489 are both registered to Lawrence Robinson.

the name Kenneth Williams were submitted to Coinbase upon the account opening.[4] Images of the Maryland Kenneth Williams driver's license from Coinbase are show below, and compared with an image from **Jerry Phillips'** actual driver's license:

Coinbase Images

Image of Jerry Phillips from MVA records

37. As stated above, there is no record of Kenneth Williams in the state of Maryland, including records maintained by the MVA and state wage records. There are no IRS income tax records belonging to Kenneth Williams. The Social Security Administration confirmed that the SSN being used for Kenneth Williams is not a valid SSN assigned to that name.

[4] A Maryland driver's license bearing a different name, "Jamal Hopkins," but using the same photograph, was also submitted to Coinbase upon opening different accounts. *See infra.*

38. Your affiant submits that there is probable cause to believe that the person shown on the counterfeit and fraudulent driver's license submitted to Coinbase for Kenneth Williams is the same person shown in the **Jerry Phillips**' official MVA image. Your affiant notes that the age of Kenneth Williams on the fake driver's license is approximately 16 years older than **Jerry Phillips'** age, while their facial images appear the same.

39. On June 8, 2020, $65,538.95 from WF 0513 was used to purchase a vehicle from Carvana, an online used car retailer. The vehicle, a 2020 Chevrolet Camaro, VIN 1G1FK1R67L0101227, was purchased in the name of **Jerry Phillips**, registered with the State of Maryland in the name **Jerry Phillips,** and delivered to 2706 Afton Street, where there is probable cause to believe **Jerry Phillips** was then living. A Maryland driver's license belonging to **Jerry Phillips** was submitted as part of the Carvana purchase. Images of the **Jerry Phillips'** driver's license from Carvana and the MVA are shown below:

Image of Driver's License Provided To Carvana To Buy 2020 Camaro

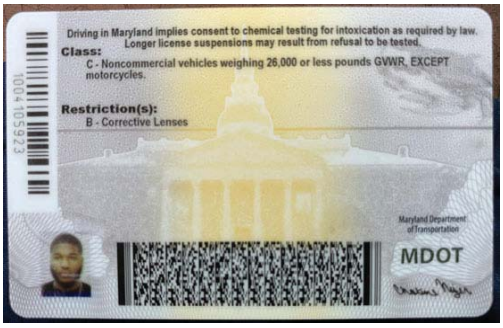


Image of Jerry Phillips from MVA records

The driver's license submitted to Carvana appears genuine, with the date of birth, driver's license number, date of issuance, and date of expiration matching the records maintained by the MVA. The images of the driver's license on file at Carvana also appear to match **Jerry Phillips'** actual driver's license on file with the MVA.

40. On or about July 3, 2020, Kenneth Williams transferred $4,800 from WF 0513 via a check to Jamal Hopkins, an alias that there is probable cause to believe **Jerry Phillips** and **Jaleel Phillips** used. *See infra.*

Allen Gator

41. According to Wells Fargo records, on or about June 9, 2020, Allen Gator opened an account ending in 6330 ("WF 6330"). The WF 6330 account listed Gator's SSN as ending in 7803, his Maryland driver's license number as G360051005608, and a purported date of birth of 8/3/90. The MVA has no record of a driver's license matching the purported driver's license number nor the name Allen Gator, with the listed date of birth. The Social Security Administration confirmed that the SSN being used for Allen Gator is not a valid SSN assigned to that name.

42. On June 16, 2020, and June 29, 2020, WF 6330 received deposits of $10,000 and $115,600. Based on documents maintained by SBA, these deposits stemmed from PPP and EIDL loan applications filed by another individual, Derek Parker.

43. On May 27, 2020, Derek Parker applied for an EIDL loan in the name of a business called Agro-Engineering Exports, Inc. On the application form, Derek Parker stated that Agro-Engineering Exports had gross revenues for the twelve months prior to January 21, 2020 of $981,251, and a cost of goods sold of more than $260,000, and 58 employees. The application stated that Agro-Engineering Export's primary business address was at 10773 NW 58th St, Doral, FL 33178. Investigators requested wage and hour information for Agro-Engineering Exports for the years 2019 and 2020 from the state of Florida. Florida was unable to find any relevant wage and hour records. Additionally, no tax returns were filed by Agro-Engineering Exports since 2003. The Florida business records that investigators found reflected that Agro-Engineering Exports was registered in or about 2001, was inactive, and last filed an annual report in Florida in or about 2006. Your affiant has found no evidence that Agro-Engineering Exports had any business operations in Florida during the time period 2019 to the present.

44. The transaction records for WF 6330 reveal numerous links to accounts and persons of interest in your affiant's investigation, including Kenneth Williams (*see supra*) and Lawrence Robinson (*see infra*). For example, on June 18, 2020 and June 19, 2020, WF 6330 sent $500 payments via Zelle to "R Lawrence." On June 22, 2020, WF 6330 sent two payments via Zelle to "R Lawrence," totaling $694. On June 26, 2020, June 29, 2020, July 2, 2020, July 3, 2020, and July 6, 2020, WF 6330 sent six payments via Zelle to "R Lawrence," totaling $15,000.

45. On July 20, 2020, WF 6330 made a $362.97 Capital One Mobile Payment for "Williamskenneth." On August 10, 2020, WF 6330 made a $1,807.29 Capital One Mobile Payment for "Williamskenneth." On August 28, 2020, WF 6330 made an $821.04 Capital One Mobile Payment for "Williamskenneth."

46. There are also multiple examples of payments from WF 6330 that were for the benefit of "Jamal Hopkins," another identity linked to the fraud scheme and to **Jerry Phillips** and **Jaleel Phillips**. *See infra*. These payments included at least four PayPal EChecks.

47. In or about June 2020, there were numerous cash withdrawals and point-of-sale transactions in WF 6330 that were linked to specific locations, including ATM withdrawals in College Park, Maryland and Southeast Washington, D.C., and Home Depot, Target, and McDonald's purchases using funds from WF 6330. Your affiant submits that based on the information in this affidavit, there is probable cause to believe that **Jerry Phillips** and **Jaleel Phillips** controlled WF 6330, and engaged in these transactions.

48. Wells Fargo has provided your affiant with an image that was captured by Wells Fargo during a June 27, 2020, $300 withdrawal from WF 6330, at 3200 Pennsylvania Ave., SE, Washington DC:

49. Your affiant submits that there is probable cause to believe that **Jaleel Phillips** is shown in the June 27, 2020 ATM image based upon a comparison with an image from **Jaleel**

Phillips' Maryland driver's license, provided below. Your affiant specifically calls the Court's attention to the similarity between the glasses shown in this ATM image and the glasses visible in **Jaleel Phillips's** MVA driver's license photo. These glasses may also be seen in other ATM footage relevant to your affiant's investigation.

MVA Image of Jaleel Phillips

Lawrence Robinson

50. According to Wells Fargo records, on or about May 16, 2020, Lawrence H. Robinson opened an account ending in 2730 ("WF 2730"). The WF 2730 account listed Robinson's SSN as ending in 9932, his Maryland driver's license number as R300441507437, and a purported date of birth of 3/20/95. The mailing address for WF 2730 was 2706 Afton Street, Temple Hills. The MVA has no record of a driver's license matching the purported driver's license number nor the name Lawrence Robinson, with the listed date of birth. The Social Security Administration confirmed that the SSN being used for Lawrence Robinson is not a valid SSN.

51. On June 16, 2020, WF 2730 initiated a $1,500 Zelle transfer to **Jerry Phillips**. WF 2730 also shows multiple ATM transactions in the account at 2845 Alabama Ave, SE, Washington, DC and 3200 Pennsylvania Ave, SE, Washington, DC. There is probable cause to believe that **Jerry Phillips** and **Jaleel Phillips** engaged in transactions involving proceeds of this fraud. Both of these ATM

locations were associated with withdrawals from the WF 0513 Kenneth Williams account, which was originally opened with funds originating from a Zelle transfer from Lawrence Robinson (*see supra*).

52. On July 4, 2020 and July 8, 2020, $300 was withdrawn in two separate transactions from WF 2730. Wells Fargo has provided your affiant with images of the person conducting these transactions, which are shown below:

WF 2730 July 4, 2020

WF 2730 July 8, 2020

MVA Image of Jaleel Phillips

53. Your affiant submits that there is probable cause to believe that Jaleel Phillips is shown in the 7/4/20 and 7/8/20 ATM images relating to WF 2730, registered in the name Lawrence Robinson.

Jamal Hopkins

54. On May 30, 2020, Jamal Hopkins applied for a PPP loan on behalf of Agroimpex, Inc., and listed himself as the primary contact on the borrower application form. The email address jamalhopkins990@gmail.com was used to apply for the Agroimpex, Inc., PPP loan. According to Google subscriber information, Jamal Hopkins was the listed user for the jamalhopkins990 email account.

55. On the PPP borrower application, Jamal Hopkins stated that Agroimpex, Inc. has an average monthly payroll of $83,802.40 with 52 employees. Your affiant requested wage and hour information for Agroimpex from the state of Florida for the years 2019 and 2020. Florida found no wage and hour records for Agroimpex. Additionally, no records were found when searching by EIN. According to Florida business records, Agroimpex appears to have ceased operations in **2010**. Agroimpex was reinstated on June 1, 2020, and listed "Jamal Hopkins" as the owner and registered agent.

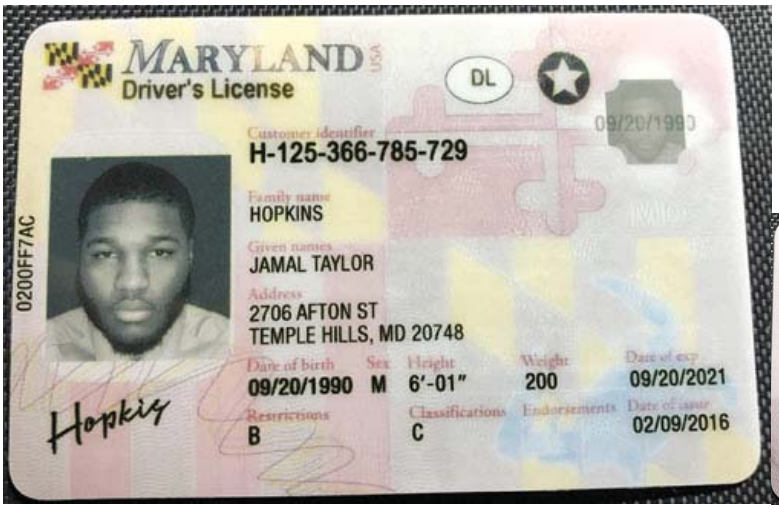
56. On or about January 14, 2020, Jamal Hopkins opened a Wells Fargo account ending in 0179 ("WF 0179"). According to Wells Fargo, WF 0179 had a registered address of 2706 Afton Street, Temple Hills, Maryland. The WF 0179 account listed Hopkins' SSN as ending in 9932, his Maryland driver's license number as H125366785729, and a purported date of birth of 9/20/90. The MVA has no record of a driver's license matching the purported driver's license number nor the name Jamal Hopkins, with the listed date of birth. The Social Security Administration confirmed that the SSN being used for Jamal Hopkins is not a valid SSN assigned to that name.

57. WF 0179 was initially funded with a $30 Zelle transfer from Lawrence Robinson. In February 2020, WF 0179 received several transfers via Zelle from Lawrence Robinson. The account balances remained relatively low in WF 0179 until in or about June 2020.

58. On June 2, 2020, WF 0179 received a $209,506 deposit from Celtic Bank Bluevine in the name of Agroimpex, Inc. Your affiant has linked this deposit to the PPP loan referenced above. Upon receipt of the PPP funds, Jamal Hopkins transferred money to several individuals via Zelle. Additionally, Jamal Hopkins made purchases totaling more than $5,000 at various retail establishments and withdrew more than $5,000 from ATMs and cash withdrawals in and around the Washington, DC metro area.

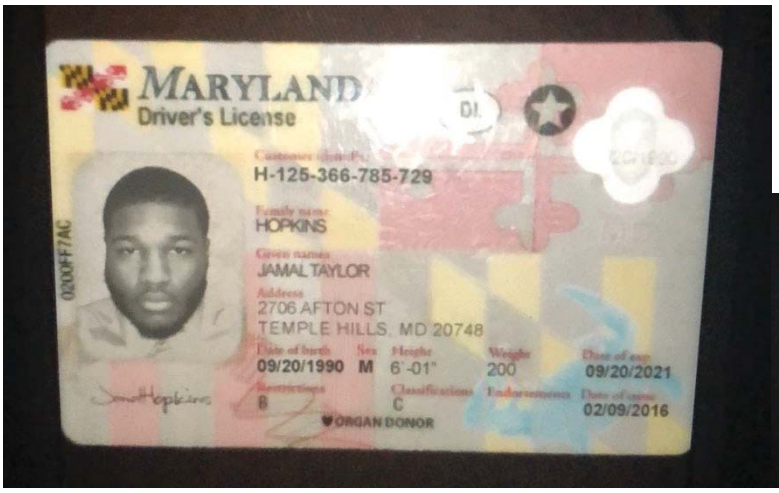
59. Celtic Bank provided a list of IP addresses used to access the Agroimpex PPP application from May 28, 2020 through May 31, 2020. The first log in occurred on May 28, 2020 using the IP address 96.241.193.39. The last log in occurred on May 31, 2020, using IP address 96.241.193.39. The remaining log ins that occurred on May 29, 2020 and May 30, 2020 also used IP address 96.241.193.39. According to Verizon IP records, **Jaleel Phillips** was the registered account owner for the IP address 96.241.193.39 during May 2020.

60. On January 10, 2020, and May 30, 2020, two accounts bearing the name Jamal Hopkins, and using adrienjackson92@gmail.com and jamalhopkins990@gmail.com respectively, were created at Coinbase, a digital currency exchange. A Maryland driver's license bearing the name Jamal Hopkins was submitted to Coinbase upon each account opening. The images from Coinbase are shown below and compared to **Jerry Phillips'** driver's license image per the MVA:



Coinbase Images

Coinbase Images

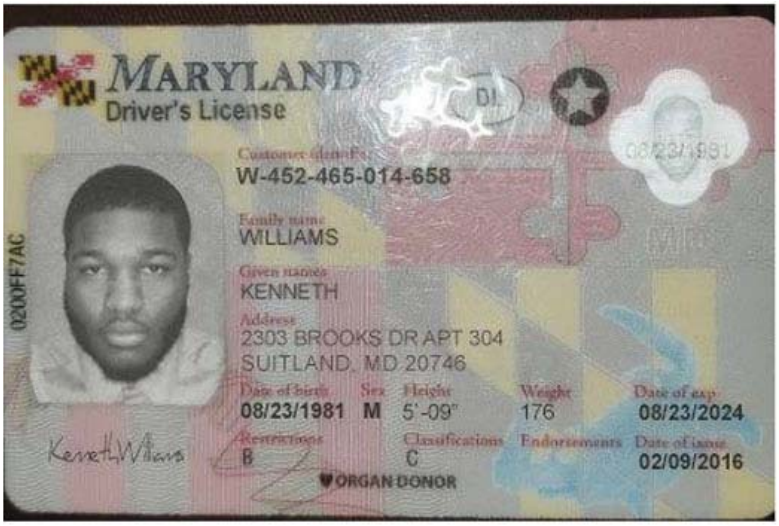


Coinbase Images

Coinbase Images

Image of Jerry Phillips from MVA records

Your affiant submits that there is probable cause to believe that the person shown in the Jamal Hopkins driver's licenses from Coinbase is the same person shown in the facial image on **Jerry Phillip's** Maryland driver's license. Moreover, your affiant notes that the two images provided to Coinbase bear the same name and ID number, but different signatures. In addition, the identifier located to the left of the facial image on both IDs, 0200FF7AC, matches that of the Kenneth Williams ID, shown here again:



Coinbase Images

Jordan Gilmoore

61. On or about April 16, 2020, Jordan Gilmoore opened a Wells Fargo account ending in 9904 ("WF 9904"). The WF 9904 account listed Gilmoore's SSN as ending in 9530, his Maryland driver's license number as G456439004901, and a purported date of birth of 11/25/95. The email address for WF 9904 was jgilmoore95@gmail.com. The MVA has no record of a driver's license matching the purported driver's license number nor the name Jordan Gilmoore, with the listed date of birth. The Social Security Administration confirmed that the SSN being used for Jordan Gilmoore is not a valid SSN.

62. WF 9904 was opened with a $100 deposit made on June 15, 2020, at a Wells Fargo branch in Largo, Maryland. The account was further funded on June 15 and June 16 with $650, which was sent via Zelle from Lawrence Robinson. In June 2020, WF 9904 received Zelle funds from Lawrence Robinson, Allen Gator, and Kenneth Williams.

63. On June 15, 2020, the email address jgilmoore95@gmail.com was used to apply for an EIDL in the name of Cultivations, Inc. Jordan Gilmoore was listed as the primary contact for Cultivations, Inc., on the application. According to Google subscriber information, "Jordan Gilmoore" is the listed user of the jgilmoore95 email account.

64. On the EIDL application, Jordan Gilmoore stated that Cultivations, Inc., had $925,875 in gross revenues the 12 months prior with 46 employees. Investigators requested wage and hour information for Cultivations, Inc., from the state of Florida for the years 2019 and 2020. There were no wage and hour records found for Cultivations, Inc. Additionally, no records were found when searching by EIN. According to Florida business records, Cultivations, Inc., has been inactive since September 2010.

65. According to SBA records, the IP address associated with the Cultivations, Inc., application is 173.73.217.89. According to Verizon IP records**, Jaleel Phillips** was the registered account owner for the IP address 173.73.217.89 in June 2020.

66. On June 23, 2020, WF 9904 received a deposit from the SBA in the amount of $115,500. According to Wells Fargo, Jordan Gilmoore made a $300 ATM withdrawal from WF 9904 on or about June 27, 2020 at an ATM located at 3200 Pennsylvania Avenue, Southeast, Washington, D.C. On that same day, Allen Gator (*see supra*) also made an ATM withdrawal at that same ATM. Wells Fargo provided your affiant with the following images from the ATM withdrawal:

WF 9904 Image (Jordan Gilmoore)

WF 9904 Image

WF 6330 Image (Allen Gator)

Specifically, the Wells Fargo records indicate that the two transactions took place at 6:44:26 and 6:47:18 p.m.

67. Your affiant submits that there is probable cause to believe that **Jaleel Phillips** is the individual shown in both June 27, 2020 ATM transactions regarding WF 9904 and WF 6330, based upon the MVA photo provided below:

MVA Image of Jaleel Phillips

68. Your affiant submits that there is probable cause to believe that **Jerry** and **Jaleel Phillips** submitted the fraudulent loan application on behalf of Cultivations, Inc., controlled WF 9904, and engaged in transactions in that account.

Solace Tarantulas/Jerry Phillips

69. On May 4, 2020, the email address pjerry31@gmail.com was used to apply for an EIDL in the name of Solace Tarantulas. **Jerry Phillips** was listed as the owner and primary contact for Solace Tarantulas. Pjerry31@gmail.com was listed as both the business email and primary email for Solace Tarantulas. According to Google subscriber information, **Jerry Phillips** is the listed subscriber for pjerry31@gmail.com. On the EIDL application, **Jerry Phillips** stated that Solace Tarantulas had $50,000 in gross revenues in the 12 months prior with nine employees. The application included an uploaded document reflecting a June 2019 articles of incorporation for Solace Tarantula's LLC.

70. The email address jaleelphillips7@gmail.com was listed as the recovery email address for pjerry31@gmail.com. According to Google subscriber information, **Jaleel Phillips** is

the user associated with the email address jaleel.phillips7@gmail.com.[5] **Jaleel Phillips**, with the email address Jaleel.Phillips7@gmail.com, is also the user of a DoorDash account associated with deliveries to 2706 Afton St, Temple Hills, Maryland and 6008 Addison Rd, Capitol Heights, Maryland.

71. According to the State of Maryland, **Jerry Phillips** was listed as the resident agent of Solace Tarantula's LLC, with a listed address of 2706 Afton Street, Temple Hills, Maryland 20748. Afton Street was used as the address for the resident agent and the principal place of business. The stated purpose of the company was "Animal and Invertebrate seller, breeder, importer, and enthusiast." According to the Maryland Department of Labor, there are no reported wages relating to Solace Tarantulas or Solace Tarantula's LLC. There are also no filings with the IRS relating to Solace Tarantulas.

72. According to SBA records, the IP address associated with the Solace Tarantulas application is 96.241.193.39. According to Verizon IP records, **Jaleel Phillips** was the registered account owner to the IP address 96.241.193.39 in May 2020.

73. On May 28, 2020, the email address pjerry31@gmail.com was listed as the customer email address for the vehicle purchased online through Carvana using the funds from WF 0513/Kenneth Williams.

Solace Realty/Jaleel Phillips

74. On May 4, 2020, the email address jaleelphillips7@gmail.com was used to apply for an EIDL in the name of Solace Realty LLC. **Jaleel Phillips** was listed as the owner and primary contact of Solace Realty LLC. The contact phone number listed on the EIDL for Solace

[5] The affiant requested Google subscriber information for jaleelphillips7@gmail.com account. Google provided the subscriber information for jaleel.phillips7@gmail.com**,** *i.e.* with the period in the username**.**

Realty was 240-299-0357, which was also listed as the recovery SMS number in the Google subscriber information for jaleel.phillips7@gmail.com.

75. On or about October 5, 2021, T-Mobile provided information showing that **Jaleel Phillips**, with address 2706 Afton Street, Temple Hills, Maryland, was the subscriber for phone number 240-299-0357. Phone number 240-299-0357 is assigned to Account No. 964651865. Phone number 240-815-3471 is also assigned to Account No. 964651865. Both numbers have been active since on or about October 10, 2018. Although **Jaleel Phillips** is the listed name on Account No. 96465186, the MSISDN name listed for the 3471 phone number is **Jerry Phillips**.

76. On the Solace Realty LLC EIDL application, **Jaleel Phillips** stated that Solace Realty LLC had $60,000 in gross revenues in the 12 months prior with nine employees. There are no filings with the IRS related to Solace Realty. Solace Realty LLC filed no reports with the Maryland DLLR during 2018, 2019, or 2020. Your affiant has found no evidence that Solace Realty LLC had any business operations in Maryland during these years.

77. According to Maryland business records, Solace Realty LLC was formed in or about February 2019, with the stated purpose of real estate investing. In or about January 2020, a resolution was filed changing the resident agent to **Jaleel Phillips** of 2706 Afton Street, Temple Hills, Maryland, and making Afton Street the principal business address. According to Maryland records, Solace Realty LLC was dissolved in June 2020.

78. According to SBA records, the IP address associated with the Solace Realty application on or about May 4, 2020 was 96.241.193.39. According to Verizon IP records, **Jaleel Phillips** was the registered account owner for the IP address 96.241.193.39 in or about May 2020.

Eric Jones - WF 2412

79. On or about June 18, 2020, Eric Jones opened a Wells Fargo account ending in 2412 ("WF 2412"). The WF 2412 account listed Jones' SSN as ending in 4820, his Maryland driver's license number as J520234009684, and a purported date of birth of 9/2/95. The address for WF 2412 was 2303 Brooks Drive, Apt. 303, Suitland, Maryland. The MVA has no record of a driver's license matching the purported driver's license number nor the name Eric Jones, with the listed date of birth. The Social Security Administration confirmed that the SSN being used for Eric Jones is not a valid SSN.

80. The opening deposit into the account was a $50 deposit, which was funded via a Zelle transfer from Jordan Gilmoore on June 18, 2020. In June and July 2020, WF 2412 engaged in several Zelle transfers with Jordan Gilmoore and Allen Gator.

81. According to Wells Fargo, Eric Jones made a $300 ATM withdrawal from WF 2412 on or about July 8, 2020 at an ATM located at 3200 Pennsylvania Avenue, Southeast, Washington, D.C. On that same day, Lawrence Robinson (*see supra*) also made an ATM withdrawal at that same ATM. Wells Fargo provided your affiant with the following images from the ATM withdrawal:

WF 2412 Image (Eric Jones)

WF 2730 Image (Lawrence Robinson)

Specifically, the Wells Fargo records indicate that the two transactions took place at 5:05 and 5:06 p.m.

82. Your affiant submits that there is probable cause to believe that **Jaleel Phillips** is the individual shown in both July 8, 2020 ATM transactions regarding WF 2412 and WF 2730, based upon the MVA photo provided below:

MVA Image of Jaleel Phillips

2303 Brooks Drive

83. Several of the fraudulent loans that are the subject of your affiant's investigation are linked to 2303 Brooks Drive, Suitland, Maryland. 2303 Brooks Drive is an apartment complex located in Suitland, Maryland. Several apartments are located within the complex.

84. Your affiant has identified multiple entities, loans, bank accounts, etc. related to your affiant's investigation that listed apartments 302, 303, and 304 at 2303 Brooks Drive, Suitland, Maryland, as the relevant mailing address.

85. For example, the address listed for WF 0513, which was used in the Agro-America/Kenneth Williams PPP loan fraud, was 2303 Brooks Drive, Apt. 304, Suitland, Maryland. The address listed for WF 6330, which was registered to Allen Gator, was 2303 Brooks Drive, Apt. 302, Suitland, Maryland. The address listed for a suspicious Wells Fargo account ending in 1383 (WF 1383), which was listed in the name David Wyatt, was 2303 Brooks Drive, Apt. 304, Suitland, Maryland. ATM transactions associated with the David Wyatt WF 1383 account revealed the following footage:

The photo, taken on June 27, 2020, corresponds by time and location to the June 27, 2020 transactions by Jordan Gilmoore, WF 9904, and Allen Gator, WF 6330, referenced above and show below:

WF 9904 Image (Jordan Gilmoore)

WF 6330 Image (Allen Gator)

There Is Probable Cause To Believe Jerry Phillips Is Tian Juzo & That Jerry Phillips Sent Incriminating Telegram Chats Re Fraudulent PPP Loans and Unemployment Insurance

86. Telegram is a cross-platform, cloud-based instant messaging software and application service. Telegram provides end-to-end encrypted voice and video calls, and offers the option of end-to-end "secret" chats. Telegram users can send text messages, voice messages, animated stickers, make voice and video calls, and share an unlimited amount of images, documents, user locations, music, and contacts.

87. Your affiant's investigation linked **Jerry Phillips** to the use of an alias, **Tian Juzo**. Your affiant has obtained incriminating evidence from law enforcement in Mississippi, which seized data relating to encrypted Telegram communications between Colby Bonds, a suspected narcotics offender in Mississippi, and **Tian Juzo, a/k/a Jerry Phillips**. Among other things, these Telegram chats appear to reference **Juzo's** ability to provide fake identification documents, and his knowledge of PPP loan fraud and criminal prosecutions. Law enforcement obtained Bonds' cell phone on October 2, 2020, and subsequently obtained a search warrant for the device.

88. There are significant Telegram communications between Bonds' Telegram account ending in 2729 (Bonds 2729) and **Juzo**'s Telegram account ending in 9019 (Juzo 9019).

In the Telegram application, **Juzo** refers to himself as "**Tian Juzo**" and Bonds' 2729 lists "Credit monster" as the user. Only a portion of the communications between the parties is referenced herein.

89. On or about February 18, 2020, **Juzo** messaged Bonds about **Juzo's** ability to provide Bonds with fake documentation. **Juzo** stated: "I have DL NJ, NY, FL, CA, GA, SC, TX IL, LA, MI, TN, OH, RI, CT, AL, VA." It listed prices for "front and back," "front only or back only," "ssn," "CC scan," and other documents. **Juzo** described to Bonds the information that Bonds should supply for the fake documents to be created. In May 2020, **Juzo** described himself as being 22 years of age, and Bonds described himself as being 20, generally consistent with the ages of **Jerry Phillips** and Bonds.

90. In a Telegram chat on May 16, 2020, Bonds asked **Juzo**: "mind me asking what's up new for u?" **Juzo** replied, "I messaged the few solid boys I got," "PUA," "The unemployment joint." Your affiant knows that PUA is a common reference to the Pandemic Unemployment Assistance program, the COVID-19 unemployment benefit program described in this affidavit beginning at Paragraph #20. Bonds and **Juzo** discussed the use of email addresses and bank accounts to file unemployment claims. Your affiant conducted a search of unemployment insurance claims data and found multiple claims associated with the email addresses and bank accounts discussed between Bonds and **Juzo**.

91. In a Telegram chat on June 30, 2020, **Juzo** wrote, "I did carvana," "Wit my real info," "You can do Fake ID if u wanna try fr." The Mississippi investigation identified the following photograph shared between **Juzo** and Bonds:

Telegram Image

Your affiant believes this is significant because of the information in this affidavit that **Jerry Phillips** used fraud proceeds to purchase a 2020 Chevrolet Camaro through Carvana in his real name. Mississippi investigators utilized the information provided by **Juzo** to request relevant records from Carvana, which identified the 2020 Chevrolet Camaro purchased by **Jerry Phillips** in June, 2020. An open source search for 2020 Chevrolet Camaros resulted in the following photo, provided for reference:

92. On July 1, 2020, **Juzo** and Bonds discussed checks sent by **Juzo** to Bonds. When Bonds asked what names the checks were in, **Juzo** answered Allen Gator. On July 2, 2020, they discussed the $300 limit for Wells Fargo ATM withdrawals and the $2,000 daily limit. In the

Telegram chat, investigators found a photo of Wells Fargo checks, which included a check from WF 6330 dated July 17, 2020, bearing the name and signature of Allen Gator and the address of 2303 Brooks Drive, Apartment 303, Suitland, Maryland. In the memo line of two of the checks, the word "PAYROLL" is written in the same handwriting.

93. In a Telegram chat on July 13, 2020, **Juzo** wrote that he had accidentally sent checks to Bonds. Bonds asked on July 14, 2020, what address to send the checks back to. On July 15, 2020, **Juzo** provided the name "Jamal Hopkins" and the address 2303 Brooks Drive, Apartment 303, Suitland, Maryland, the address used by **Jerry Phillips** and **Jaleel Phillips** for bank accounts associated with fraudulent PPP loans.

94. In a Telegram chat on August 5, 2020, **Juzo** wrote, "PPP is looked into hard cause u have to falsify documents," "If you look at any SBA cases, its always PPP+dumbasses ap'ing over $500k," "they're all idiots." From the communications, it is apparent that **Juzo** shared multiple articles about PPP prosecutions with Bonds. Your affiant knows that PPP is an abbreviation commonly used to refer to the type of government loans that **Jerry Phillips** sought under aliases, as described in this affidavit.

95. Your affiant has reviewed Telegram chats between **Juzo** and Bonds in which **Juzo** made reference to various aspects of filing fraudulent unemployment insurance claims. In a Telegram chat on May 20, 2020, **Juzo** told Bonds, "Im bouta drop u sauce," https://ui-cares-act.mass.gov/PUA/_/" and "I go on zillow and find houses for sale." Bonds responded, "But I need to gone grab fullz n shii," "So I need Massachusetts fullz bro?" "Or idm," "Cause guy I'm working with on my site say he got Washington." **Juzo** then answered, "u can use whatever tbh," "But if u can cop MA even better," "they might have already applied tho lmao."

96. Based on your affiant's review of these messages, and her training and experience

with unemployment insurance claims, your affiant submits that **Juzo** discussed how to submit fraudulent unemployment claims, and Bonds asked whether he needed social security numbers for Massachusetts' claims. **Juzo** explained that Bonds didn't necessarily need Massachusetts' social security numbers, but if Bonds could get some Massachusetts' social security numbers, that would work even better for Massachusetts' claims.

97. According to Google, the email address tianheijuzo@gmail.com was listed as the recovery email address for jamalhopkins990@gmail.com, the email used by Jamal Hopkins to apply for a PPP loan on behalf of Agroimpex, Inc., and resulting in over $200,000 in fraudulent gains. According to Google subscriber information, "**Tian Juzo**" is listed as the name associated with the tianheijuzo email account.

Jerry Phillips and Jaleel Phillips Are Associated With Fraudulent Unemployment Insurance Applications

98. Federal agents have uncovered evidence that from in or about March 2020 to in or about October 2020, **Jerry Phillips** and **Jaleel Phillips** conspired to defraud the States and federal government in connection with UI and COVID-19 benefits that were intended to help Americans suffering adverse employment impacts from the pandemic.

99. As described above, Bonds and **Juzo, a/k/a Jerry Phillips**, discussed the filing of fraudulent unemployment claims. Your affiant conducted a search of unemployment insurance claims data and found the following claims associated with the email addresses and bank accounts discussed between Bonds and **Juzo**:

State	Claimant	Date Filed	IP Address
CA	C.S.	June 18, 2020	207.246.105.115
MA	K.O.	May 16, 2020	174.62.247.214
MA	L.M.	May 16, 2020	174.62.247.214
MA	J.A.	May 19, 2020	108.49.234.131
MA	I.P.	May 16, 2020	174.62.247.214
AZ	M.K.	September 9, 2020	172.58.4.217

MA	A.B.	May 16, 2020	174.62.247.214

Based on my training and experience, I know that the common dates and IP addresses shared between the claims is indicative of a conspiracy to file fraudulent claims in multiple states, by one or more individuals working together. In addition, these claims were identified by emails and bank accounts shared between Bonds and **Juzo**, neither of whom resided in California, Massachusetts, or Arizona. A further search of the common IP address, 174.62.247.214, resulted in the identification of 166 claims filed between May and August 2020, in 10 different states and resulting in over $300,000 in paid benefits.

100. In addition, your affiant conducted a search of unemployment insurance claims data using Verizon IP address 96.241.193.39, which was registered to **Jaleel Phillips** during the time period February 7, 2020 through June 5, 2020, and was used to file for PPP and EIDL loans as discussed above. Your affiant found the following claims:

State	Claimant	Date Filed	IP Address
MA	S.B.	May 16, 2020	96.241.193.39
MA	V.B.	May 16, 2020	96.241.193.39
OH	V.B.	June 2, 2020	174.97.10.98
MA	David Wyatt	May 14, 2020	174.192.199.193
MI	Wyatt David	May 19, 2020	96.241.193.39
MA	K.F.	May 16, 2020	96.241.193.39
MA	C.G.	May 16, 2020	96.241.193.39
MA	Jamal Hopkins	May 14, 2020	96.241.193.39
MA	O.I.	May 16, 2020	96.241.193.39
CA	A.J.	July 17, 2020	24.227.80.90
MA	A.J.	May 17, 2020	96.241.193.39
NV	A.J.	June 14, 2020	72.31.58.19
DC	Y.M.	March 22, 2020	96.241.193.39
CA	D.M.	August 25, 2020	139.28.216.106
MA	D.M.	May 16, 2020	96.241.193.39
MA	B.P.	May 14, 2020	96.241.193.39
MD	Jerry Phillips	May 14, 2020	96.241.193.39
MA	J.P.	May 17, 2020	96.241.193.39

MA	J.R.	May 17, 2020	96.241.193.39
MA	Kenneth Williams	May 16, 2020	96.241.193.39

As previously stated, the overlap in dates and IP addresses between the claims is indicative of a conspiracy to file fraudulent claims in multiple states, by one or more individuals working together. In addition, the filing of claims for a single individual in multiple states is indicative of fraud either by the individual or by another party using that individual's identifying information.

101. On or about May 14, 2020, **Jerry Phillips** applied for unemployment from the State of Maryland using IP address 96.241.193.39 and mailing address 2706 Afton Street. On that same day, IP address 96.241.193.39 was used to file two unemployment claims in the State of Massachusetts, for Jamal Hopkins and claimant B.P. The Jamal Hopkins claim used the email address jamalhopkins990@gmail.com, which Jamal Hopkins used on May 30, 2020, to apply for a PPP loan on behalf of Agroimpex, Inc. The B.P. claim listed WF 0513 as the bank account for receiving unemployment benefits. WF 0513 was the bank account opened by Kenneth Williams and used to receive over $300,000 from a PPP loan that Kenneth Williams applied for under the name of Agro-America, Inc.

102. On or about May 16, 2020, Kenneth Williams applied for PUA, using IP address 96.241.193.39, email address kenswill81@gmail.com, and indicating that he lived at 115 Minebrook Road, Webster, Massachusetts. Information from Massachusetts authorities showed that more than $7,000 was paid via direct deposit to WF 0513, which was also reflected in the Wells Fargo records for that account.

103. Your affiant also identified Massachusetts and Michigan unemployment benefits in the name David Wyatt. David Wyatt was the identity used to open WF 1383 (*see supra*). In addition, Wyatt is associated with the accounts previously discussed via Zelle payments. For

example, Kenneth Williams' WF 0513 (**Jerry Phillips**) sent $500 via Zelle to Dave Wyatt on or about June 29, 2020; $400 on or about July 3, 2020; and $1,000 on or about July 7, 2020.

104. On or about March 29, 2020, Lorenza Robinson applied for PUA with Washington, D.C., claiming COVID-19 related loss of employment. The address currently associated with the March 29, 2020 claim is 323 62nd ST, NE, Apt. 205, Washington, D.C. The address previously associated with the claim was 2706 Afton Street, Temple Hills, Maryland, and the associated email address was robinson.lorenza@gmail.com. As discussed elsewhere in this affidavit, your affiant has reason to believe that on or about March 29, 2020, **Jerry Phillips** and **Jaleel Phillips** lived at 2706 Afton Street, Temple Hills, Maryland. Robinson claimed prior employment at Golf Course Specialists Inc., purportedly earning more than $25,000 through the four employment quarters ending in the third quarter of 2019. Available incorporation records for Maryland and Virginia reveal no incorporated entity called Golf Course Specialists Inc. The District of Columbia does have records of Golf Course Specialists Inc., but it was an entity that was created in 1982 and last filed a report with DC in or about 1991.

105. As a result of the claim, the District of Columbia caused more than $15,000 to be paid to Robinson via a prepaid debit card. An additional claim in Robinson's name and SSN was filed for Arizona unemployment benefits in October, 2020. As previously stated, the filing of claims for a single individual in multiple states is indicative of fraud either by the individual or by another party using that individual's identifying information.

106. On or about May 17, 2020, a person using the name, date of birth, and social security number of a real person with the initials A.J. applied for unemployment with Massachusetts using IP address 96.241.193.39, resulting in a payment of $7,962 in benefits. In addition, A.J.'s real date of birth and social security number were used to file claims in

California and Nevada in June and July 2020, resulting in payments of $14,700 and $6,959 in benefits respectively. The use of common identifiers for a claimant, here A.J's PII, in multiple states during the same time period is strongly indicative of an organized fraud.

107. Moreover, your affiant knows from her training and experience that individuals involved in this type of fraud are aware that if the name, date of birth, and social security number used in a claim do not match, *i.e.* are not linked to a real person, it is far less likely that the claim will be successful.

108. Public records indicate that A.J. has only ever lived in Washington State and Alaska. Your affiant has spoken with A.J.'s ex-husband, who indicated that A.J. is a real person living in Anchorage, Alaska. A search of Alaska's Division of Motor Vehicles records indicates that A.J. was issued an Alaska driver's license on April 5, 2021, with an address in Anchorage, Alaska. In addition, Alaska public court records place A.J. in Alaska. Your affiant has found no evidence of any person with A.J.'s name and date of birth who lived or worked in Massachusetts, California, or Nevada during 2019 or 2020.

109. Your affiant knows based on her training and experience that claims for unemployment benefits should be filed in the state in which the claimant previously worked. In addition to the filing of claims for a single individual in multiple states, a lack of association between the claimant and the states in which claims were filed is also indicative of fraud.

110. In total, your affiant identified at least 15 unemployment claims associated with IP address 96.241.193.39 during the time period when that IP was registered to **Jaleel Phillips**. To date, your affiant has identified more than $50,000 in actual unemployment insurance losses based on claims linked to **Jerry Phillips** and **Jaleel Phillips.** This does not include all identified

claims, and is limited to claims tied directly by address information, bank information, IP address, email addresses, and phone numbers.

CONCLUSION

111. Based on the above information, your affiant submits that there is probable cause to believe that **Jerry Phillips** and **Jaleel Phillips** committed wire fraud, in violation of 18 U.S.C. § 1343, and **Jerry Phillips** committed aggravated identity theft, in violation of 18 U.S.C. § 1028A, in relation to schemes to defraud regarding COVID-19 pandemic loans and unemployment benefits.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Jenchira Vogel

Jenchira Vogel
Special Agent
U.S. Department of Labor
Office of Inspector General

Affidavit submitted by email and attested to me as true and accurate by telephone, consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 22 day of December 2021.

HONORABLE THOMAS M. DIGIROLAMO
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MARYLAND