AFFIDAVIT OF SPECIAL AGENT JORDAN KNIGHT IN SUPPORT OF APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Jordan Knight, having been duly sworn, do hereby depose and state as follows:

AGENT BACKGROUND

1. I have been employed with the United States Secret Service ("Secret Service") since 2014, and I am currently assigned as a Special Agent to the New England Cyber Fraud Task Force within the Boston Field Office. My duties include the investigation of federal offenses, to include wire fraud, bank fraud, access device fraud, and identity theft, among other things. In preparation for my employment as a Special Agent with the Secret Service, I completed extensive training at the Secret Service James Rowley Training Center in Beltsville, Maryland, including courses related to constitutional law, criminal investigations and various financial crimes. I hold a B.A. in Criminology from Central Connecticut State University. Prior to becoming a Special Agent, I was a Sergeant with the Uniformed Division of the Secret Service in Washington, D.C.

2. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") was signed into law. Through my responsibilities with Secret Service, I have become familiar with various government benefit programs that were established and/or expanded in connection with the CARES Act, and I have been personally involved in investigating fraud schemes involving CARES Act programs. CARES Act benefit programs include a temporary federal program unemployment insurance program called Pandemic Unemployment Assistance ("PUA"). These also include Paycheck Protection Program ("PPP") loans issued by the Small Business Administration ("SBA") and Economic Injury Disaster Loans ("EIDLs") issued by the SBA. In recent months, I have played a role in investigating individuals

who have been charged with federal crimes in connection with their efforts to obtain, via fraud, PUA benefits and/or SBA loans.

PURPOSE OF AFFIDAVIT

3. I submit this affidavit in support of an application for a criminal complaint charging Ronald Wesley BUIE IV (date of birth 06/27/1986) with wire fraud, in violation of 18 U.S.C. § 1343, and an arrest warrant for BUIE.

4. The information reflected in this affidavit derives from my review of voluminous records, including bank records, SBA records, and emails, as well as from information obtained from other law enforcement officers and from my training and experience.

5. As set forth in more detail below, and based on my training and experience, I believe that BUIE has schemed to defraud the SBA via the submission of fraudulent documents in support of EIDL and PPP loan applications, including but not limited to documents submitted under various false names (collectively, the "False Identities"). I also believe that, in furtherance of this scheme to defraud, BUIE has utilized the False Identities to apply for PUA benefits, to open bank accounts, and to obtain credit. I further believe that BUIE has submitted fraudulent applications for bank or credit accounts using his own name, but an alternate SSN that is not in fact assigned to him (SSN ***-**-7891), and was complicit in the filing of a fraudulent PUA claim in his own name.

6. The False Identities employed in connection with BUIE's scheme to defraud include the following: Darren Lawson, Darnell Lawson, Donald Lawson, Orlando Iran, and Jason Ridgeway.

7. As set forth below, various emails, financial transactions, IP address logons, and

other evidence tie BUIE to use of the False Identities. Based on my review of financial records, and my training and experience, I believe that thousands of dollars in fraudulent PUA benefits were paid into accounts opened in the names of the False Identities and were then transferred to one or more accounts controlled by BUIE.

8. I know, based on my training and experience, that many of the actions taken in furtherance of BUIE's scheme to defraud – including the sending of instant messages, text messages or emails, the transmission of money between bank accounts, the spending of money via credit or debit card, and the submission of applications for loans, government benefits, or financial accounts – involved the transmission of interstate wires.

9. While this particular complaint charges BUIE with one count of wire fraud in violation of 18 U.S.C. § 1343, I am aware from my investigation that BUIE has also committed other federal criminal violations not charged here.

BACKGROUND

10. BUIE is a resident of New York, and has utilized mailing addresses in Queens and the Bronx, including but not limited to XXXX Curtis Street, East Elmhurst, NY (the "Curtis Address") and XXXX Townsend Ave, Apt. XX, Bronx, NY (the "Townsend Address").

11. BUIE operates Platinum Car Service, LLC, a livery / transportation business operating out of New York City.

12. BUIE's actual Social Security number ("SSN") is ***-**-8121.

13. BUIE utilized the email addresses Platinumexecutive2@gmail.com and ronald12buie12@gmail.com.[1]

---

[1] Various other email addresses beyond those listed in this affidavit, are associated with various relevant identities, applications, or accounts. In other words, this affidavit does not purport to

14. BUIE utilized phone number xxx-xxx-8849, with service provided by AT&T the "BUIE Phone"). BUIE has also identified his phone number as xxx-xxx-6804 and xxx-xxx-9791.[2]

15. I have seen a photograph of BUIE holding his Social Security card (listing name Ronald Wesley Buie IV and SSN ***-**-8121) and his New York State driver's license (number ***-***-038, and listing BUIE's actual date of birth and the Curtis Address).[3]

16. BUIE controlled Chase Total Business Checking account ending -2580 in the name of Platinum Car Service, LLC (the "Platinum Chase Account"). Opening documents for the Platinum Chase Account list the signatory as BUIE and specify his actual date of birth. These records also list the BUIE Phone, and list BUIE's actual SSN (ending -8121). Video surveillance recovered of the Platinum Chase Account reveal what appears to be BUIE accessing two Chase Bank ATMs in November 2021.[4] Statements for the Platinum Chase Account list the

---

list all email addresses or other contact information associated with each relevant account or identity.

[2] For example, in an October 5, 2020 email, "Ronald Buie" (ronald12buie12@gmail.com) identified his phone number as xxx-xxx-6804. Additionally, Comenity Capital Bank records produced for an IKEA credit card application under BUIE's name list phone numbers xxx-xxx-6804 and xxx-xxx-9791.

[3] While BUIE apparently used the Curtis Address as his legal address, I am aware that he also received mail at the Townsend Address. In addition, certain emails sent to or from BUIE tie BUIE to the Townsend Address. For example, an August 26, 2020 email from Edible Arrangements to Platinumexecutive2@gmail.com confirmed the order of a bouquet, with the payment information listing BUIE at the Townsend Address. In addition, an email from National Credit Direct to ronald12buie12@gmail.com on January 14, 2021 attached a sales receipt for cologne / eau de toilette spray, which listed BUIE's billing and shipping address as the Townsend Address.

[4] Based on my training and experience, I believe this is BUIE depicted in the video footage based upon my personal observations of BUIE's New York State driver's license and Facebook photographs.

Curtis Address.

17. Co-conspirator 3 ("CC-3") is an associate of BUIE who coordinated the submission of fraudulent PUA applications on behalf of BUIE and others.

PROBABLE CAUSE

Forged Bank Statements and Tax Documents

18. Platinum Car Service LLC received a $60,000 PPP loan on or about June 2, 2020. Loan application documents list the authorized person for the loan as BUIE, and list the Curtis Address and the email address Platinumexecutive2@gmail.com.[5]

19. BlueVine application materials list the annual revenue for Platinum Car Service LLC as $325,000. Included with the application materials was a purported monthly statement for February 2020 for the Platinum Chase Account. This purported monthly statement was addressed to Platinum Car Service at the Curtis Address. This purported monthly statement specified the pertinent account number (ending -2580), and listed a beginning balance of $81,607.40, deposits and additions of $125,883.63, and an ending balance of $198,699.31.

20. Chase has produced records for the Platinum Chase Account. These records include the actual monthly statement for February 2020 for the Platinum Chase Account. This monthly statement was addressed to Platinum Car Service LLC at the Curtis Address. The monthly statement listed a beginning balance of $2,613.31, deposits and additions of $7,872.41, and an ending balance of $2,262.05.

---

[5] I have reviewed loan application materials produced by BlueVine, a California-based lender. BlueVine partnered with Cross River Bank to process and make various SBA loans. I have also reviewed SBA records relating to multiple SBA loan applications submitted for Platinum Car Service.

21. Records for the Platinum Chase Account for June 2020 reflect the deposit of $60,000 from BlueVine with the description "Sba Loan."

22. Based on my training and experience, I believe that BUIE submitted a forged bank statement for the Platinum Chase Account in support of an SBA loan application. This forged statement falsely indicated that Platinum Car Service LLC had assets and deposits far greater than it in fact did during the relevant timeframe.

Misrepresentation of Social Security Number

23. Emails from the ronald12buie12@gmail.com account reflect that, in October 2020, BUIE asked a jewelry retailer about the status of his account, with the retailer responding "We have 2 apps with 2 socials." BUIE then replied that his SSN had the last 4-digits -7891. In a separate email in January 2021, BUIE (again using ronald12buie12@gmail.com) specified his SSN as xxx-xx-7891.

24. The Social Security Administration has certified that SSN ending -7891 is not assigned to any individual.

25. Credit One records for an account ending -7348 show customer name Ronald BUIE and specify BUIE's actual date of birth. These records list email address Ronald12buie12@gmail.com. These records also list BUIE's SSN as xxx-xx-7891. Statements for this account list the Townsend Address.

26. Citi records for an account ending -1566 include opening documents listing the applicant as BUIE and specifying his actual date of birth. These records appear to list email address Ronald12buie12@gmail.com. These records also list BUIE's SSN as ending -7891.[6]

---

[6] I am aware that individuals involved with financial fraud sometimes obtain nine-digit Credit Privacy Numbers – known as "CPNs" – and then misrepresent these numbers as actual SSNs.

Statements for this account list the Townsend Address.

27. In addition to this account being opened in BUIE's name and with his date of birth, this account is linked to BUIE via transactions to or from Platinum Car Service LLC, as follows:

a. February 2021 Zelle Debit for $1,500 to "Platinum Car."

b. March 2021 Zelle Debit for $4,000 to "Platinum Car."

c. March 2021 Zelle Credit for $2,000 from "Platinum Car."

d. April 2021 Zelle Debit for $2,000 to "Platinum Car."

28. Wells Fargo records for an account ending -0997 show customer name Ronald BUIE and specify BUIE's actual date of birth. These records also list BUIE's SSN as ending -7891. Statements for this account list the Townsend Address.

29. In addition to this account being opened in BUIE's name and with his date of birth, this account is linked to BUIE via a purchase in February 2021 for travel via American Airlines:

02/05	249430015WESMX6WQ	AMERICAN AIR0012155711751 FORT WORTH TX		613.40
	02/07/21	BUIE/RONALD		
	1 AA D	NEW YORK	CHARLOTTE	
	2 AA D	CHARLOTTE	FAYETTEVILLE	
	3 AA D	FAYETTEVILLE	CHARLOTTE	
	4 AA D	CHARLOTTE	NEW YORK	

30. American Airlines records reflect an itinerary for Ronald Wesley BUIE to include a February 7, 2021 trip from New York (LGA) to Charlotte (CLT) to Fayetteville (FAY), with a return from Fayetteville to Charlotte to New York on February 10, 2021. These records show BUIE as residing at the Townsend Address but list his actual date of birth, his actual phone

number (xxx-xxx-8849), and his actual email address (Platinumexecutive2@gmail.com). Other American Airlines records for BUIE reflect this same date of birth, phone number, and email address, and list the Curtis Address.

31. Santander records for an account ending -6083 show customer name Ronald BUIE and specify BUIE's actual date of birth. These records list email address Ronald12buie12@gmail.com. These records also list BUIE's SSN as ending -7891. Statements for this account list the Townsend Address.

32. The signature card for Santander account ending -6083 lists the Applicant IP Address as 100.12.178.205. Records produced by Verizon show that this IP address was assigned to customer Ronald BUIE at the Curtis Address.

33. In addition to this account being opened in BUIE's name and with his date of birth, and from an IP address linked to his residence, this account is linked to BUIE via purchases and transactions from Cartagena, Colombia and Nassau, Bahamas in or around July 2021.

34. For example, records maintained by U.S. Customs and Border Patrol ("CBP") reflect that BUIE traveled from New York (JFK) to Cartagena (CTG) on June 29, 2021 and returned on July 4, 2021. Santander records for an account ending -6083 show various transactions from Cartagena in July 2021, including the following:

07-01	INTERNATIONAL TRANSACTION FEE REB PL MINIM DR CARTAGENA /BOL CO	$0.36	$1,906.08
07-02	BOLD.CO SAS CAR CARTAGENA /BOL CO CARD PURCHASE	$100.62	$1,805.46
07-02	INTERNATIONAL TRANSACTION FEE BOLD.CO SAS CAR CARTAGENA /BOL CO	$4.02	$1,801.44
07-02	MEDIHEALTH-SERV CARTAGENA /BOL CO CARD PURCHASE	$213.44	$1,588.00
07-02	INTERNATIONAL TRANSACTION FEE MEDIHEALTH-SERV CARTAGENA /BOL CO	$8.54	$1,579.46
07-02	LA BOTICA DE BO CARTAGENA /BOL CO CARD PURCHASE	$37.94	$1,541.52
07-02	INTERNATIONAL TRANSACTION FEE LA BOTICA DE BO CARTAGENA /BOL CO	$1.52	$1,540.00
07-02	DTODO MARKET TURBACO /BOL CO CARD PURCHASE	$20.54	$1,519.46
07-02	INTERNATIONAL TRANSACTION FEE DTODO MARKET TURBACO /BOL CO	$0.82	$1,518.64
07-06	RAFAEL CORREA P CARTAGENA /BOL CO CARD PURCHASE	$15.89	$1,502.75
07-06	INTERNATIONAL TRANSACTION FEE RAFAEL CORREA P CARTAGENA /BOL CO	$0.64	$1,502.11
07-06	DUTY FREE CTGNA CARTAGENA /BOL CO CARD PURCHASE	$250.60	$1,251.51

35. Similarly, CBP records reflect that BUIE traveled from New York (JFK) to Nassau (NAS) on July 13, 2021 and returned (via Atlanta) on July 17, 2021. Santander records for an account ending -6083 show various transactions from Nassau in July 2021, including the following:

07-14	INTERNATIONAL TRANSACTION FEE COURTYARD MARRI NASSAU /BHS BS	$1.05	$637.83
07-15	THE MARKET CONV NASSAU BS CARD PURCHASE	$35.00	$602.83
07-15	INTERNATIONAL TRANSACTION FEE THE MARKET CONV NASSAU BS	$1.40	$601.43
07-15	CASH APP*ELIJAH 4153753176 /CA US CARD PURCHASE	$50.00	$551.43
07-16	COURTYARD MARRI NASSAU /BHS BS CARD PURCHASE	$33.91	$517.52
07-16	INTERNATIONAL TRANSACTION FEE COURTYARD MARRI NASSAU /BHS BS	$1.36	$516.16
07-16	THE MARKET CONV NASSAU BS CARD PURCHASE	$14.90	$501.26
07-16	INTERNATIONAL TRANSACTION FEE THE MARKET CONV NASSAU BS	$0.60	$500.66
07-19	THE MARKET CONV NASSAU BS CARD PURCHASE	$10.90	$489.76
07-19	INTERNATIONAL TRANSACTION FEE THE MARKET CONV NASSAU BS	$0.44	$489.32
07-19	COURTYARD MARRI NASSAU /BHS BS CARD PURCHASE	$30.10	$459.22
07-19	INTERNATIONAL TRANSACTION FEE COURTYARD MARRI NASSAU /BHS BS	$1.20	$458.02
07-19	CASH APP*MADEAN 4153753176 /CA US CARD PURCHASE	$40.00	$418.02
07-19	THE MARKET CONV NASSAU BS CARD PURCHASE	$4.00	$414.02
07-19	INTERNATIONAL TRANSACTION FEE THE MARKET CONV NASSAU BS	$0.16	$413.86
07-19	THE MARKET CONV NASSAU BS CARD PURCHASE	$15.50	$398.36

Darren Lawson Identity

36. This investigation has established that the identity of "Darren Lawson," DOB 06/26/1984, SSN xxx-xx-7089 was used for various fraudulent applications / accounts, and has tied BUIE to the use of this false identity. The Social Security Administration has certified that SSN ending -7089 is not assigned to any individual.

Use of Darren Lawson False Identity

37. SBA records include a loan application for "Darren Lawson" dated August 12, 2020. According to the application materials, this sole proprietorship had gross revenues of more than $327,000 for the 12 months leading up to January 31, 2020, and was engaged in printing/graphic design. The owner of the business was listed as Darren Lawson (SSN ending -7089), with an address at XXXX Holland Ave., Bronx NY (the "Holland Address") and the email address darrenlawson23@gmail.com. The application listed a bank account ending – 8367 with First Technology FCU, which is a federally-insured institution doing business as "First Tech." Included in the application records is a New York driver's license in the name of Darren Lawson listing the Holland Address.

38. SBA records for this application also include the image of a Social Security card in the name of Darren Lawson (SSN ending -7089) and an invoice on letterhead for "Lawson Prints & Designs" bearing the Holland Address.

39. First Tech records for checking account ending -8367 reveal that this account is under the name of Darren Lawson. These records list the Townsend Address and email address darrenlawson23@gmail.com.

40. A First Tech bank statement from September 2020 shows a September 1 deposit

into account ending -8367 of $64,900 from the SBA. The statement then shows what appears to be a reversal of this deposit on September 4.

41. Records produced by the State of Ohio reflect that an application for PUA benefits was filed on June 7, 2020 under the name of Darren Lawson. Records relating to this PUA claim list Lawson's email address as darrenlawson23@gmail.com, list either an address in Columbus, OH, an address in the Bronx, NY, or the Holland Address. These records list the applicant's 1040A wages as $119,000. These records list a bank account number ending -7090 (associated with a Simple / BBVA account).[7]

42. Records produced by BBVA for account ending -7090 reflect the name Darren Lawson and the Townsend Address. These records reflect the deposit of PUA funds, including a "Credit for ODJFS-PUA FEDERAL" for $11,988 on June 25, 2020.[8]

43. Records produced by Capital One for MasterCard account ending -0328 reflect the name Darren Lawson, an email address darrenlawson23@gmail.com, and an address of XXXX Sherman Avenue in the Bronx, NY (the "Sherman Address").

<u>Evidence Tying BUIE to the Darren Lawson False Identity</u>

44. As noted, certain accounts opened in the Darren Lawson identity listed the Townsend Address, as did the Credit One, Citi, Santander accounts opened in BUIE's name.

45. Records produced by the State of Ohio for the Darren Lawson's PUA application

---

[7] The Ohio records for this claim also list TD Bank Account ending -4837 and an account number ending -1276 (associated with a Sutton Bank account). TD Bank records for account ending -4837 reflect the name Darren Lawson and the Townsend Address. Sutton Bank records for the account ending -1276 reflect the name Darren Lawson and the Townsend Address.

[8] The Ohio office of Unemployment Insurance Operations falls within the Ohio Department of Job and Family Services ("ODJFS").

and First Tech reflect the phone number xxx-xxx-9791, and as noted above, BUIE has also identified his phone number as xxx-xxx-9791.

46. Records produced by BBVA for account ending - 7090 reflect apparent payments to Platinum Car Service LLC, including a June 22, 2020 debit of $3,000 to "PLATINUM CAR SERVICE,"

47. Records for Capital One account ending -0328 in the name of Darren Lawson reflect an apparent payment of $500 to Platinum Car Service LLC via PayPal on April 8, 2020 (payment to PAYPAL *PLATINUMCAR4029357733CA).[9]

48. Various emails in the Platinumexecutive2@gmail.com account show BUIE's tie to Darren Lawson, including the following:

a. March 26, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $20 to Darren Lawson.

b. April 8, 2020 email from PayPal to Platinumexecutive2@gmail.com noting that "Darren Lawson sent you $500."

c. April 20, 2020 email from Platinumexecutive2@gmail.com to darrenlawson23@gmail.com attaching[10] IRS letter to Darren Consulting LLC at the Sherman Address concerning assignment of Employer Identification Number ("EIN").

d. May 9, 2020 email from Chase to Platinumexecutive2@gmail.com noting that Darren Lawson had requested money through Chase Quickpay with Zelle.

e. June 7, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a supposed 2019 W-2 from Interim

---

[9] This transaction appears to correspond with the April 8, 2020 email to the Platinumexecutive2@gmail.com account as described in ¶ 48(b).

[10] References to email attachments include items that are formally attached to and/or embedded in the body of pertinent email.

Healthcare, Inc. in Columbus, Ohio, EIN 65-0475457.[11] The W-2 lists employee name Darren Lawson, with SSN ending -7089. The W-2 lists 2019 wages of $119,002.10.

f. June 7, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com with a link to the following web address: https://pua.unemployment.ohio.gov/Claimant/Core/Login.ASPX.

g. June 11, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com with the image of a Social Security card in the name Darren Lawson, with SSN ending -7089.

h. June 18, 2020 email from DoNotReply@billing-notification.com to platinumexecutive2@gmail.com regarding a "Platinum car service – Transaction Receipt for $3,000.00," noting a payment of $3,000 on Visa card ending -8397 and listing the name "Lawson/Darren."

i. June 19, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $490 from Darren Lawson.

j. June 29, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $1,000 from Darren Lawson.

k. July 7, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $2,000 from Darren Lawson.

l. July 8, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $1,200 from Darren Lawson.

m. August 25, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $1,530 from Darren Lawson.

n. August 29, 2020 emails from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching supposed invoices for Lawson Prints & Designs, with the Holland Address and the email address darrenlawson23@gmail.com on the letterhead.[12]

o. September 12, 2020 email from CashApp to Platinumexecutive2@gmail.com

---

[11] A lawyer for Interim Healthcare has indicated that this is not an EIN for Interim Healthcare or any of its franchisees. As such, this appears to be a fraudulent W-2.

[12] On August 29, 2020, darrenlawson23@gmail.com sent what appear to be these same invoices to the SBA.

noting the payment of $1,500 from Darren Lawson.

p. February 24, 2021 email from darrenlawson23@gmail.com to Platinumexecutive2@gmail.com attaching Zoom link for "tonights trucking class."

49. In addition, certain emails within an email account tied to the Darren Lawson identity (darrenlawson23@gmail.com) show a connection with BUIE, including the following:

a. June 18, 2020 email from DoNotReply@billing-notification.com to Platinumexecutive2@gmail.com regarding a "Platinum car service – Transaction Receipt for $3,000.00."

b. July 10, 2020 email from First Tech confirming a payment from "PLATINUM CAR SERVICE, LLC."

c. September 28, 2020 email from CashApp to Lawson indicating that "Mr. Buie" sent $50.

50. Records produced by Chase for the Platinum Chase Account reflect that this account – which was controlled by BUIE – show the deposit of a May 2020 money order for $1,000 from Darren Lawson (listing the Sherman Address), and two June 2020 money orders $800 from Darren Lawson (listing the Holland Address) ($1,800 total). Records for this account also show various Square / CashApp transactions reflecting the name Darren Lawson, as well as a withdrawal in 2020 for the apparent purchase of a cashier's check for Darren Lawson.

51. Records for BUIE's account with Citi (account ending –1566) show a September 2020 Zelle credit from "Darren Lawso" [*sic*].

52. Records produced by BBVA for account ending in -7090 under the name Darren Lawson reveal that on or around June 26, 2020, over $5,000.00 of purchases were made at post offices located in East Elmhurst, NY and Flushing, NY. The purchases were made utilizing Visa card ending in -8397 linked to the BBVA account ending in -7090. Records produced by the USPS reveal that the purchases were for (5) money orders: (4) made payable to a person with

initials "TT" and (1) payable to "Platinum Car Service LLC." Chase records produced for the Platinum Chase Account reveal that a $1,000 money order made payable to Platinum Car Service, LLC was deposited into the account on or around June 26, 2020. Additionally, on the same date a cashier's check from "TT" for $8,300.00 was deposited into the Platinum Chase Account.[13]

53. Based on the foregoing, and my training and experience, I believe that the BUIE fraudulently used the "Darren Lawson" identity as part of his scheme to defraud, including by using this identity to seek government benefits and to open financial accounts.

[13] Emails found within the platinumexecutive2@gmail.com account appear to show a connection with "TT." On March 20, 2020, it appears BUIE forwarded an email to "TT" (mrt.thomas@hotmail.com) of what appears to be a United Parcel Service Earnings Statement with a pay date of March 13, 2020 under the name "TT." Several other emails were sent from Chase to platinumexecutive2@gmail.com noting that "TT" had sent money through Chase Quickpay with Zelle. It should be noted that emails were exchanged between "TT" (mrt.thomas@hotmail.com) and CC-2 containing various 2019 tax documents.

Darnell Lawson Identity

54. This investigation has established that the identity of "Darnell Lawson," DOB 06/26/1984, SSN xxx-xx-0849 was used for various fraudulent applications / accounts, and has tied BUIE to the use of this false identity. The Social Security Administration has certified that SSN ending -0849 is not assigned to any individual.

Use of Darnell Lawson False Identity

55. SBA records include a loan application for Florida corporation "Agrifarm Solutions Corp" dated May 13, 2020. According to the application materials, this sole proprietorship had gross revenues of $850,000 for the 12 months leading up to January 31, 2020, and was engaged in agriculture. The owner of the business was listed as Darnell Lawson (SSN ending -0849), with his residence listed as the Townsend Address and his email address listed as darnelllnd90@gmail.com. The application listed a Chase bank account ending –5529. Included in the application records is a New York driver's license in the name of Darnell Lawson listing the Holland Address.

56. SBA records for this application also include what purports to be a letter dated January 19, 2019 from the IRS to Agrifarm Solutions Corp concerning assignment of Employer Identification Number ("EIN").

57. Records produced by Chase for account ending -5529 reflect the name of Darnell Lawson, SSN ending -0849, DOB 06/26/1984, and the Townsend Address.

58. Records for the Chase account ending -5529 also reflect various CARES Act deposits on May 20, 2020, totaling approximately $7,900, as seen below:

05/20	MA Dua	Cares Act	PPD ID: C046002284	**942.00**	948.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**942.00**	1,890.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**942.00**	2,832.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**942.00**	3,774.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**942.00**	4,716.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**942.00**	5,658.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**942.00**	6,600.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**342.00**	6,942.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**342.00**	7,284.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**342.00**	7,626.68
05/20	MA Dua	Cares Act	PPD ID: C046002284	**342.00**	7,968.68

59. Based on my review of records, my discussion with other agents, and my training and experience, I believe the following regarding these May 20, 2020 deposits:

a. That these funds were transmitted from the Massachusetts Department of Unemployment Assistance ("DUA")[14] to Chase Bank, and that these transmissions would have been interstate.

b. That these funds were transmitted in connection with DUA Claim A00-000-0450-5848. I have reviewed certain records associated with this claim.

c. That DUA records reflect a PUA application from Orlando Iran on May 16, 2020, which reflects an address in Webster, Massachusetts, SSN ending -9164, and the email address darrenlawson23@gmail.com. This application lists bank account number ending -5529.

d. That DUA records include a letter dated May 18, 2020 addressed to Orlando Iran in Webster, Massachusetts indicating that he had met the eligibility requirements for a PUA claim and would receive up to $342 per week and that his

[14] DUA received CARES Act funds from the U.S. Treasury into an account at People's United Bank in Connecticut. DUA then caused funds to be transmitted from the People's United Bank account into the claimant designated financial account.

maximum benefit amount was $10,413.[15]

60. Records produced by the State of Ohio reflect that an application for PUA benefits was filed on June 10, 2020 under the name of Darnell Lawson. Records relating to this PUA claim list Lawson's email address as darnelllawsond90@gmail.com and list the Holland Address. These records list the applicant's 1040A wages as $119,000. These records list Santander bank account ending -8933.

61. Records produced by Santander for account ending – 8933 reflect the name Darnell Lawson, an email address darnelllawsond90@gmail.com, and the Townsend Address.

62. Records produced by USAA for account ending -1241 reflect the name Darnell Lawson, an email address darnelllawsond90@gmail.com, the Townsend Address, and the phone number ending in -6804.

63. Records produced by Discover for accounts ending -1854 and/or -0402 reflect the name Darnell Lawson and the Townsend Address, and email address darnelllawsond90@gmail.com.

<u>Evidence Tying BUIE to the Darnell Lawson False Identity</u>

64. The MA PUA claim using an email address associated with Darren Lawson resulted in funds being transmitted interstate into a bank account under the name Darnell Lawson; as noted above, the Darren Lawson identity is tied to BUIE.

65. As noted, certain accounts opened in the Darnell Lawson identity listed the Townsend Address, as did the Credit One, Citi, and Santander accounts opened in BUIE's name.

[15] This letter identifies the maximum benefit amount does not include the additional $600 per week in Federal Pandemic Unemployment Compensation. This amount also does not include the additional monies for weekly benefit allowance. Claimants are eligible to receive $25 per week per dependent up to half of the claim's weekly benefit allowance.

66. The Chase account ending -5529 and the USAA account ending -1241 each list Darnell Lawson's telephone number ending in -6804 and, as noted above, BUIE has also identified his phone number as xxx-xxx-6804.

67. The Chase account ending -5529 also shows certain transactions to or from Platinum Car Service LLC: a February 19, 2020 Zelle payment from Platinum Car Service LLC, an April 13, 2020 Zelle payment from Platinum Car Service LLC, and a May 12, 2020 Zelle payment of $1,000 to Car Service.[16]

68. Various emails in the Platinumexecutive2@gmail.com account show BUIE's tie to Darnell Lawson, including the following:

a. April 12, 2020 email from Chase to Platinumexecutive2@gmail.com noting that Darnell Lawson had requested money through Chase Quickpay with Zelle.

b. April 17, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $600 to Darnell Lawson.

c. May 11, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $2,500 from Darnell Lawson.

d. May 11, 2020 email from Chase to Platinumexecutive2@gmail.com noting that Darnell Lawson had sent $1,500 through Chase Quickpay with Zelle.

e. May 12, 2020 email from Chase to Platinumexecutive2@gmail.com noting that Darnell Lawson had sent $1,000 through Chase Quickpay with Zelle.

f. June 10, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a supposed 2019 W-2 from Interim Healthcare, Inc. in Columbus, Ohio, EIN 65-0475457. The W-2 lists employee name Darnell Lawson, with SSN ending -0849. The W-2 lists 2019 wages of $119,002.10.

g. June 10, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a photograph of a supposed social

[16] Records produced by Chase for the Platinum Chase Account reveal that on May 12, 2020 a Zelle payment for $1,000 from Darnell Lawson was in fact deposited.

security card in the name of Darnell Lawson ending in -0849.

h. June 13, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a photograph of a supposed New York State driver's license in the name of Darnell Lawson, listing the Townsend Address.

i. June 13, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching an IRS letter dated January 19, 2019 to Agrifarm Solutions Corp concerning the assignment of an EIN.

j. August 10, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a photograph of a supposed U.S. Passport in the name of Darnell Lawson and a supposed AT&T wireless statement addressed to Darnell Lawson.

k. August 10, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a photograph of a supposed Ohio birth certificate in the name of Darnell Lawson.

l. September 9, 2020 email from DoNotReply@billing-notification.com to Platinumexecutive2@gmail.com regarding a "Platinum car service – Transaction Receipt for $1,350.00," noting a payment of $1,350 on MasterCard card ending -7212 and listing the name "Lawson/Darnell."

m. September 19, 2020 email from Amtrak to Platinumexecutive2@gmail.com with a sales receipt for train travel from New York to Washington DC for passenger Ronald BUIE. The receipt lists as billing information "Darnell Lawson" at the Townsend Address.

n. October 7, 2020 email from DoNotReply@billing-notification.com to Platinumexecutive2@gmail.com regarding a "Platinum car service – Transaction Receipt for $500.00," noting a payment of $500 on MasterCard card ending -7212 and listing the name "Lawson/Darnell."

69. In addition, certain emails within an email account tied to the Darnell Lawson identity (darnelllnd90@gmail.com) show a connection with BUIE, including a June 16, 2020 email from Darnell Lawson to Bank of America, attaching what appears to be the same January 19, 2019 IRS letter concerning Agrifarm Solutions Corp. that was sent by BUIE to himself on June 13, 2020, along with a certificate from the Florida Department of State.

70. Records produced by Chase for the Platinum Chase Account reflect the deposit of

two May 2020 money orders, each for $1000 and each from Darnell Lawson." Records for this account also show various Square / CashApp transactions reflecting the name Darnell Lawson and at least one Zelle payment to Darnell Lawson.

71. Records produced by USAA for account ending -1241 show a February 24, 2020 payment via Zelle to Platinum Car Service, Llc.

72. Records for Santander account ending – 8933 reflect a transaction occurring in the U.S. Virgin Islands on or around September 28, 2020.[17] In addition, the Santander records for account ending – 8933 reflect a transaction at a Wal-Mart in Fayetteville, NC on or around July 8, 2021.[18]

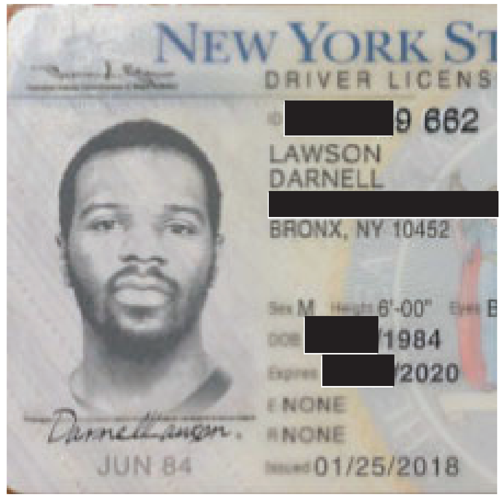
73. The photographs that appear on the aforementioned New York State driver's license in the name of Darnell Lawson and the U.S. Passport in the name of Darnell Lawson do not match. These two supposed identification documents do not depict the same person, although they do list the same date of birth (**/**/1984):[19]

---

[17] Delta Airlines records reflects travel by BUIE to St. Thomas airport (STT) on September 26, 2020 and then back to New York City (JFK) via Atlanta (ATL) on September 30, 2020. Government records reflect his arrival at ATL from STT on September 30, 2020 (though these records do not show BUIE's departure to STT on or around September 26, 2020).

[18] American Airlines records reflect on July 7, 2021, BUIE traveled from LaGuardia Airport (LAG) to Fayetteville Regional Airport (FAY) through Charlotte Douglas Int. Airport (CLT). On July 10, 2021 BUIE returned to LaGuardia Airport (LAG) from Fayetteville Regional Airport (FAY) through Charlotte Douglas Int. Airport (CLT).

[19] On August 31, 2020, darnelllnd90@gmail.com emailed the SBA a different supposed New York State driver's license in the name "Darnell Lawson," which lists the Holland Address and DOB **/**/1984 but that appears to depict yet another individual:



74. Based on the foregoing, and my training and experience, I believe that the BUIE fraudulently used the "Darnell Lawson" identity as part of his scheme to defraud, including by using this identity to seek government benefits and to open financial accounts.

<u>Donald Lawson Identity</u>

75. This investigation has established that the identity of "Donald Lawson," DOB 06/26/1984, SSN xxx-xx-7212 was used for certain fraudulent applications / accounts, and has tied BUIE to the use of this false identity.[20]

[20] The Social Security Administration has certified that SSN ending -7212 is assigned to an individual. I do not know whether or not this SSN was assigned to someone named Donald

Use of Donald Lawson False Identity

76. Records of the DUA reflect a claim for PUA benefits filed on May 19, 2020 in the name of Donald Lawson, SSN ending -7212, date of birth 06/26/1984. The claim records list an address in Abington, Massachusetts, and a bank account number ending - 1821 (associated with a NetSpend / MetaBank account).

77. SBA records include a loan application for "Lawson Advisors" dated July 9, 2020. According to the application materials, this sole proprietorship had gross revenues of $150,000 for the 12 months leading up to January 31, 2020, and was engaged in educational services. The owner of the business was listed as Donald Lawson (SSN ending -7212), with his residence listed in North Carolina and his email address listed as dlawson684@yahoo.com. The application listed a BBVA bank account ending – 8478.

78. Records produced by the State of Ohio reflect that an application for PUA benefits was filed on June 10, 2020 under the name of Donald Lawson. Records relating to this PUA claim list addresses in Columbus, OH and Red Springs, NC. These records list the applicant's 1040A wages as $119,000. These records list a BBVA bank account ending -8478, as well as a bank account number ending - 1821 (associated with a NetSpend / MetaBank account).

79. Records produced by NetSpend/MetaBank for account ending -1821 reflect the customer name Donald N. Lawson, with an address in North Carolina and phone number ending -6804. These records show a credit of $12,960 from ODJFS-PUA FEDERAL on June 26, 2020 and a similar credit for $972 three days later.

Lawson.

Evidence Tying BUIE to the Donald Lawson False Identity

80. The NetSpend/MetaBank for account ending -1821 and the Donald Lawson Ohio PUA application listed Donald Lawson's telephone number ending in -6804 and, as noted above, BUIE has also identified his phone number as xxx-xxx-6804.

81. Various emails in the Platinumexecutive2@gmail.com account show BUIE's tie to Donald Lawson, including the following:

a. June 10, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a supposed 2019 W-2 from Interim Healthcare, Inc. in Columbus, Ohio, EIN 65-0475457. The W-2 lists employee name Donald Lawson, with SSN ending -7212. The W-2 lists 2019 wages of $119,002.10.

b. June 11, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching photographs (front and back) of a supposed Social Security card in the name of Donald Lawson, with SSN ending -7212.

c. June 27, 2020 email from DoNotReply@billing-notification.com to Platinumexecutive2@gmail.com regarding a "Platinum car service – Transaction Receipt for $5,000.00," noting a payment of $5,000 on MasterCard ending -0710 and listing the name "Lawson/Donald."

d. July 7, 2020 email from DoNotReply@billing-notification.com to Platinumexecutive2@gmail.com regarding a "Platinum car service – Transaction Receipt for $1,000.00," noting a payment of $1,000 on MasterCard ending -0710 and listing the name "Lawson/Donald."

e. July 31, 2020 email from DoNotReply@billing-notification.com to Platinumexecutive2@gmail.com regarding a "Platinum car service – Transaction Receipt for $1,050.00," noting a payment of $1,050 on MasterCard ending -0710 and listing the name "Lawson/Donald."

82. Records produced by Chase for the Platinum Chase Account reflect the deposit of a May 2020 money order for $1000 from Donald Lawson.

83. NetSpend/MetaBank records for account ending -1821 reflect a debit of $5,000 to Platinum Car Service on July 1, 2020, a debit of $1,000 to Platinum Car Service on July 8, 2020,

and a debit of $1,050 to Platinum Car Service on August 1, 2020.

84. Based on the foregoing, and my training and experience, I believe that the BUIE fraudulently used the "Donald Lawson" identity as part of his scheme to defraud, including by using this identity to seek government benefits and to open financial accounts.

Orlando Iran Identity

85. This investigation has established that the identity of "Orlando Iran," DOB xx/xx/1973, SSN xxx-xx-9164 was used for certain fraudulent applications / accounts, and has tied BUIE to the use of this false identity.[21]

Use of Orlando Iran False Identity

86. SBA records include a loan application for "AgroProductora Agrosol, Inc." dated June 26, 2020. According to the application materials, this sole proprietorship had gross revenues of more than $926,000 for the 12 months leading up to January 31, 2020, and was engaged in agriculture. The owner of the business was listed as Orlando Iran (SSN ending -9164) with the email address orlandoiran30@gmail.com. The application listed a Wells Fargo bank account ending - 7983.

87. Wells Fargo records for account ending -7983 reflect the name Orlando Iran, the email address orlandoiran6191@gmail.com, and the Townsend Address. These records show Orlando Iran to be the President of Agrosol Inc. Records reflect a deposit of $112,600 from the SBA on July 23, 2020, as well as an apparent SBA PPP loan deposit on March 26, 2021.

88. Stride / Chime records for Visa card ending -4502 reflect the name Orlando Iran,

[21] The Social Security Administration has certified that SSN ending -9164 is assigned to an individual. I do not know whether or not this SSN was assigned to someone named Orlando Iran.

the Townsend Address and email address orlandoiran6191@gmail.com.

Evidence Tying BUIE to the Orlando Iran False Identity

89. The MA PUA claim under the name Orlando Iran listed an email address associated with Darren Lawson and resulted in funds being transmitted interstate into a bank account under the name Darnell Lawson; as noted above, the Darren Lawson and Darnell Lawson identities are each tied to BUIE.

90. As noted, the Wells Fargo account opened in the Orlando Iran identity listed the Townsend Address, as did the Credit One, Citi, and Santander accounts opened in BUIE's name.

91. Various emails in the Platinumexecutive2@gmail.com account show BUIE's tie to Orlando Iran, including the following:

a. August 16, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $500 from Orlando Iran.

b. August 28, 2020 email from CashApp to Platinumexecutive2@gmail.com noting the payment of $525 to Orlando Iran.

c. November 11, 2020 email from Platinumexecutive2@gmail.com to orlandoiran6191@gmail.com, attaching a supposed New York State driver's license in the name of Orlando Iran, which lists the Townsend Address.

d. November 11, 2020 email from Platinumexecutive2@gmail.com to orlandoiran6191@gmail.com, attaching a supposed AT&T wireless statement addressed to Orlando Iran at the Townsend Address.

e. January 22, 2021 email from Platinumexecutive2@gmail.com to orlandoiran6191@gmail.com, attaching a supposed AT&T wireless statement addressed to "James Lee" at the Holland Address. [22]

92. In addition, certain emails within an email account tied to the Orlando Iran

[22] While the names and addresses differ between the supposed AT&T bills sent via email by BUIE to "Orlando Iran" on November 11 and January 22, both bills have the same account number (******4782), same date (October 31, 2020), and same amount due ($91.74). It thus appears these are forged or counterfeit account statements not legitimately issued by AT&T.

identity (orlandoiran6191@gmail.com) show a connection with BUIE, including emails from Wells Fargo on June 25, 2020 and June 28, 2020 noting Zelle payments from Platinum Car Service LLC.

93. According to Google records, the IP address 100.12.178.205 was used to logon to orlandoiran6191@gmail.com.com in October 2020. That same IP address was also used to logon to Platinumexecutive2@gmail.com that same day.

94. Records produced by Chase for the Platinum Chase Account reflect two Zelle payments from this account to Orlando Iran in June 2020.

95. Records for BUIE's account with Citi (account ending –1566) show a July 2020 Zelle credit from "Orlando Iran."

96. Records for the Wells Fargo account ending -7983 (in the name Orlando Iran) reflect Zelle payments from Platinum Car Service LLC in June 2020.

97. Records for the Wells Fargo account ending -7983, Stride / Chime records for Visa card ending -4502, and the SBA application for Argoproductora Argosol, Inc. list phone number ending in -3675, which is also listed as the user phone number and the "Recovery SMS" for ronald12buie12@gmail.com.

98. Based on the foregoing, and my training and experience, I believe that the BUIE fraudulently used the "Orlando Iran" identity as part of his scheme to defraud, including by using this identity to seek government benefits and to open financial accounts.

Jason Ridgeway Identity

99. This investigation has established that the identity of "Jason Ridgeway," DOB xx/xx/1971, SSN xxx-xx-0124 was used for certain fraudulent applications / accounts, and has tied BUIE to the use of this false identity. The Social Security Administration has certified that SSN ending -0124 is not assigned to any individual.

Use of Jason Ridgeway False Identity

100. SBA records include a loan application for "Ridgeway Consultants" dated July 4, 2020. According to the application materials, this sole proprietorship had gross revenues of $450,000 for the 12 months leading up to January 31, 2020, and was engaged in advertising sales. The manager of the business was listed as Jason Ridgeway (SSN ending -0124), with the Townsend Address and the email address ridgewayjason22@gmail.com. The application listed a BBVA bank account ending - 7640.

101. Records produced by the State of Ohio reflect that an application for PUA benefits was filed on June 8, 2020 under the name of Jason Ridgeway. The records list the Townsend Address as well as an address in Columbus, Ohio and the email address ridgewayjason22@gmail.com. These records list the applicant's 1040A wages as $119,000. These records list a Citibank account ending -5879.

102. Citibank records for account ending -5879 reflect the name Jason Ridgeway and the email address "Ridgewayjason22@gm..." [*sic*]. Beginning in July 2020, statements list the Holland Address. Records for this account reflect what appears to be an SBA PPP credit in April 2021 and another SBA PPP credit in May 2021.

103. Harvest has produced a PPP borrower application form that bears the purported

signature of Jason Ridgeway and is dated April 5, 2021. This application lists SSN ending -0124, email address jasonridgeway6191, and business phone number ending in -9791. The application lists a business address on "halland [*sic*] ave" in the Bronx. Harvest has also provided a similar PPP application that bears the purported signature of Jason Ridgeway and is dated April 11, 2021.

104. TD Bank records for accounts ending -5821, -7494, -0919, -0969, -1008, and -4265 reflect the name Jason Ridgeway and the Townsend Avenue Address.

Evidence Tying BUIE to the Jason Ridgeway False Identity

105. As noted, the Ohio PUA claim for Jason Ridgeway certain TD Bank accounts under this name listed the Townsend Address, as did the Credit One, Citi, and Santander accounts tied to BUIE.

106. Various emails in the Platinumexecutive2@gmail.com account show BUIE's tie to Jason Ridgeway, including the following:

a. June 8, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a supposed Social Security card in the name of Jason Paul Ridgeway, with SSN ending -0124.

b. June 8, 2020 email from Platinumexecutive2@gmail.com to Platinumexecutive2@gmail.com attaching a supposed 2019 W-2 from Interim Healthcare, Inc. in Columbus, Ohio, EIN 65-0475457. The W-2 lists employee name Jason Ridgeway, with SSN ending -0124. The W-2 lists 2019 wages of $119,002.10.

107. In addition, certain emails within an email account tied to the Jason Ridgeway identity (ridgewayjason22@gmail.com) show a connection with BUIE, including a September 16, 2020 email from Citibank reflecting a payment request from Ronald BUIE and a November 16, 2020 email from Citibank confirming a payment request to Ronald BUIE.

108. Records produced by Harvest Small Business Finance and TD Bank reveal Jason Ridgeway provided telephone number xxx-xxx-9791 and, as noted above, BUIE has also

identified his phone number as xxx-xxx-9791.

109. According to Google records, the IP address 100.12.178.205 was used to logon to jasonridgeway6191@gmail.com in January 2021. That same IP address was also used to logon to Platinumexecutive2@gmail.com the following month.

110. Records produced by Chase for the Platinum Chase Account include a cashier's check dated March 4, 2020 payable to Jason Ridgeway of the Townsend Address.

111. Records for Citibank account ending -5879 show a September 16, 2020 Zelle payment to BUIE, a November 16, 2020 Zelle payment to BUIE, as well as a September 28, 2020 transaction in St. Thomas, USVI.

112. Records for BUIE's account with Citi (account ending –1566) show a September Zelle credit from "Jason Ridgew" [*sic*].

113. Based on the foregoing, and my training and experience, I believe that the BUIE fraudulently used the "Jason Ridgeway" identity as part of his scheme to defraud, including by using this identity to seek government benefits and to open financial accounts.

Additional Evidence of False Identities

114. Among the additional evidence that accounts under various of the False Identities were connected is the following:

a. February 27, 2021 email from Darren Lawson (darrenlawson23@gmail.com) to another Gmail address (ending -6191@gmail.com) attaching a November 2020 Citibank account statement for Jason Ridgeway. The statement lists Ridgeway as living at the Holland Address and reflects a Zelle payment to BUIE.

b. The July 2020 statement for the Wells Fargo account ending -7983 (in the name of Orlando Iran) shows a Zelle transfer to "Ridgeway Jason." The October 2020 statement for this account shows Square / CashApp payments to "Darren LA"[23] and certain Zelle payments to "Ridgeway Jason." [24]

c. The January 2021 statement for Citibank account ending -5879 (in the name of Jason Ridgeway) shows a Zelle credit from Orlando Iran.

d. On September 4, 2020, the following transactions occurred at the same ATM in Queens, NY: $8,000 cash deposit into the Jason Ridgeway Citi account (ending -5879) and a $303 cash withdrawal from the Orlando Iran Wells Fargo account. (ending -7983).

e. An October 2, 2020 email from CashApp to Darren Lawson (darrenlawson23@gmail.com) noting payment from Orlando Iran.

f. United States Postal Service ("USPS") "informed delivery" confirmation notices showing mail being delivered in 2020 to the Townsend Address under the names Ronald BUIE, Darren Lawson, Darnell Lawson, Orlando Iran, and Jason Ridgeway.

g. Google records showing certain relevant accounts to be "linked by cookies." For example, the Platinumexecutive2@gmail.com account is linked to darrenlawson23@gmail.com and darnelllnd90@gmail.com; the email accounts darrenlawson23@gmail.com and ridgewayjason22@gmail.com are linked, and the email accounts darrenlawson23@gmail.com and

---

[23] An October 2, 2020 email from Cash App to Darren Lawson (darrenlawson23@gmail.com) noting payment from Orlando Iran. The October 2020 statement for the Wells Fargo account ending in -7983 reflect this transaction posted on October 5, 2020.

[24] This statement also shows what appears to be a Square / CashApp payment to "Ronayatol" (BUIE is known to use the alias Ron Ayatollah).

jasonridgeway6191@gmail.com are linked.

h. Google records showing that the recovery email for darnelllnd90@gmail.com is darrenlawson23@gmail.com.

i. The IP address 72.68.225.84 was used to access and/or submit terms of service for the accounts jasonridgeway6191@gmail.com, orlandoiran6191@gmail.com, and darrenlawson23@gmail.com.[25]

j. The phone number xxx-xxx-9791 – subscribed to Darren Lawson – is listed in connection with email accounts or bank accounts associated with Darren Lawson, Darnell Lawson, and Jason Ridgeway.

115. Cell Site Location Information ("CSLI") data records produced by AT&T reveal that the BUIE Phone is tied to various financial transactions for the accounts of Jason Ridgeway, Darren Lawson, Darnell Lawson and Orlando Iran. One example of the extent to which evidence of BUIE's location can constitute evidence of the Target Offenses concerns his travel to the U.S. Virgin Islands in September 2020, as noted above. The "Jason Ridgeway" Citi account (ending -5879) shows a debit purchase in St. Thomas, VI on September 28, 2020. The "Darnell Lawson" Santander account (ending -8933) shows a card purchase at Walgreens in Thomas, VI on September 28, 2020. AT&T data records reflect that on September 28, 2020 the BUIE Phone was in fact located in St. Thomas, VI.

116. Additional data produced by AT&T reflect the following transactions appear to have similar locations associated with the BUIE Phone, among others:[26]

---

[25] According to Verizon, this IP address is associated with an individual in the Bronx, NY who also appears to be the user of an email address that communicated with platinumexecutive2@gmail.com.

[26] References in this affidavit to the dates of banking transactions may not reflect the date of the transaction itself, but instead the date the transaction was posted/processed.

a. March 27, 2020 – purchase at Pitkin Seafood in Brooklyn, NY (Jason Ridgeway – TD Bank account ending -5821).

b. June 20, 2020 – purchase at 555 Discount Liquors in Jersey City, NJ (Darren Lawson- Simple Finance Technology Company (BBVA) account ending -7090).

c. July 29, 2020 – ATM cash deposit in Whitestone, NY (Darren Lawson – TD Bank account ending -4837).

d. August 30, 2020 – ATM withdrawal in Paterson, NJ[27] (Orlando Iran – Wells Fargo account ending -7983).

e. September 4, 2020 - ATM deposit in Queens, NY (Jason Ridgeway - Citi account ending -5879).

f. September 4, 2020 – ATM withdrawal in Queens, NY (Orlando Iran – Wells Fargo account ending in -7983).

g. September 10, 2020 – purchase at Sonic Drive-In in Elizabeth, NJ (Orlando Iran – Wells Fargo account ending -7983).

h. September 18, 2020 – purchase at Home Depot in Queens, NY (Jason Ridgeway - Citi account ending -5879).

i. September 18, 2020 – purchase at Boom Car Wash in Brooklyn, NY (Darren Lawson – TD Bank account ending -4837).

j. September 20, 2020 – ATM withdrawal in Paterson, NJ (Orlando Iran – Wells Fargo account ending -7983).

k. October 22, 2020 – ATM deposit in Garden City, NY (Orlando Iran – Wells Fargo account ending -7983).

l. November 25, 2020 – purchase at Mar-Pat Liquors in Flushing, NY (Darnell Lawson – Santander account ending -8993)

m. January 11, 2021 – purchase at Dollar General in Queens, NY (Darnell Lawson – Santander account ending -8933)

n. April 17, 2021 – purchase at Benihana in Manhasset, NY (Jason Ridgeway – Citi account ending -5879)

[27] Text communications reveal that, on August 30, 2020, BUIE was planning on dropping off an individual at CC-3's residence located in Paterson, NJ.

o. July 8, 2021 – purchase at Walmart in Fayetteville, NC (Darnell Lawson – Santander account ending -8933)

p. July 8, 2021 – purchase at Exxon-Short Stop in Lakeview, NC (Darnell Lawson – Santander account ending -8933)

117. Based on my training and experience, I believe the transactions described above compared with similar locations of the BUIE Phone constitutes evidence tying BUIE to the false identity accounts and proving his role in this fraud scheme.

Fraudulent Massachusetts PUA Application

118. In addition to the foregoing, a fraudulent claim for PUA benefits was submitted to DUA under BUIE's name. It appears as though BUIE did not personally submit this claim, but he was aware of the claim being submitted and subsequently paid a portion of his benefit payments as kickbacks to a co-conspirator ("CC-3") who was involved in submitting this claim and various other fraudulent PUA claims. CC-3 has been charged in federal court and has pleaded guilty to wire fraud conspiracy in connection with the submission of various fraudulent PUA claims.

119. Specifically, DUA records reflect that PUA claim A00-000-0705-1428 was submitted on June 2, 2020, specifying BUIE's name, his actual date of birth, his actual SSN (ending -8121), the Platinumexecutive2@gmail.com, the Curtis Address, and phone number xxx-xxx-8849.

120. In connection with this claim, the applicant indicated that his 2019 reported income was $11,500 and indicated that his self-employment in Massachusetts was first affected on February 27, 2020. In addition, the applicant provided the following answers to the following eligibility questions:

Q: Did you work in Massachusetts when you were impacted by COVID-19?

A: Yes

Q: Did you work in another state besides Massachusetts when you were affected by COVID-19?

A: No

121. DUA records concerning this claim reflect a Bethpage Federal Credit Union account ending -1532. Records from Bethpage Federal Credit Union for this account reflect BUIE's name, SSN ending -8121, the Curtis Address, Platinumexecutive2@gmail.com, and phone number xxx-xxx-8849. Records for this account also reflect thousands of dollars in deposits from "MA DUA MA PUA PROGRAM – CARES ACT."

122. Records produced by Chase for the Platinum Chase Account reflect a Square / CashApp payment to CC-3 in or around August 2020.

123. Based on my training and experience, and the facts developed in this investigation, I believe that the PUA claim submitted in BUIE's name was in fact fraudulent, and that it falsely stated that BUIE worked in Massachusetts and did not work in any other state. In fact, during the relevant timeframe, BUIE owned and operated Platinum Car Service LLC, a transportation business based in New York, and engaged in various transportation-related business activity in New York.

CONCLUSION

124. Based on the foregoing, there is probable cause to believe that, on or about May 20, 2020, Ronald BUIE, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme to defraud – specifically, the transmission of funds from MA DUA into a Chase bank account, all in violation of Title 18, United State Code, Section 1343.

Sworn to under the pains and penalties of perjury.

Jordan Knight
Special Agent
U.S. Secret Service

Subscribed and sworn by telephone in accordance with Fed. R. Crim. P. 4.1

on January 25, 2022

Honorable Donald L. Cabell
United Sates Magistrate Judge

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS