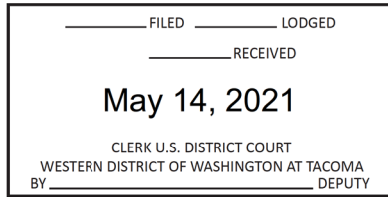


The Honorable David W. Christel



UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff

v.

ABIDEMI RUF  
a/k/a Sandy Tang,

Defendant.

CASE NO. MJ21-5101

**AMENDED COMPLAINT for  
VIOLATIONS**

Title 18 U.S.C. § 1343

BEFORE, David W. Christel, United States Magistrate Judge, United States  
Courthouse, Tacoma, Washington.

The undersigned complainant, being duly sworn, states:

**COUNTS 1-5**  
**(Wire Fraud)**

**A. Background**

1. These charges involve ABIDEMI RUF's participation in a scheme to fraudulently collect unemployment benefits intended for American workers suffering from the economic effects of the COVID-19 pandemic. RUF, a Nigerian national who is not entitled to collect unemployment benefits in the United States, submitted dozens of

1 | claims to the Washington Employment Security Department and other state workforce  
2 | agencies using the stolen identities of residents of Washington and other states. In so  
3 | doing, RUFAl caused and attempted to cause the Employment Security Department to  
4 | pay out federal and other unemployment benefits in excess of \$350,000, and caused other  
5 | states to pay out additional fraudulent benefit payments.

6 |         2.       On March 27, 2020, the United States enacted into law the Coronavirus  
7 | Aid, Relief, and Economic Security (CARES) Act. The CARES Act authorized  
8 | approximately \$2 trillion in aid to American workers, families, and businesses to mitigate  
9 | the economic consequences of the COVID-19 pandemic. The CARES Act funded and  
10 | authorized each state to administer new unemployment benefits. These benefits include:  
11 | (1) Federal Pandemic Unemployment Compensation (FPUC), which provided a benefit  
12 | of \$600 per week per unemployed worker in addition to existing benefits; (2) Pandemic  
13 | Unemployment Assistance (PUA), which extends benefits to self-employed persons,  
14 | independent contractors, and others; and (3) Pandemic Emergency Unemployment  
15 | Assistance (PEUC), which extends benefits for an additional 13 weeks after regular  
16 | unemployment benefits are exhausted.

17 |         3.       CARES Act unemployment benefits are funded by the United States  
18 | government through the Department of Labor and administered at the state level by state  
19 | agencies known as state workforce agencies (SWAs). The Washington Employment  
20 | Security Department (ESD) is the SWA for the of the State of Washington.  
21 | Applicants can apply online for ESD-administered benefits by accessing Washington’s  
22 | SecureAccess Washington (SAW) web identity validation portal and ESD’s  
23 | Unemployment Tax and Benefit (UTAB) online application system.

24 |         4.       Before submitting an application to ESD, the applicant must establish a  
25 | SAW account. As part of this process, the applicant must provide the SAW system with  
26 | an email address. The SAW system then sends, by interstate wire communication  
27 | originating in Olympia, Washington, an activation link to the email address provided.

28 | The user must then click on a link to activate his or her account. This process causes a

1 series of wire transmissions originating at the user's location and terminating in Olympia,  
2 Washington.

3 5. After activating the SAW account, the user may proceed to ESD's UTAB  
4 application system. To file a claim, the applicant enters his or her personal identifying  
5 information, to include name, date of birth, and Social Security number. If ESD confirms  
6 that the information matches the personal identifying information of a person in ESD's  
7 records, ESD will pay out benefits via wire (ACH) transfer to a bank or financial account  
8 identified by the applicant.

9 **B. The Scheme to Defraud**

10 6. Beginning at a time unknown, but no later than March 9, 2020, and  
11 continuing through on or after October 3, 2020, at Olympia, within the Western District  
12 of Washington, and elsewhere, ABIDEMI RUFAL, aka Sandy Tang, and others known  
13 and unknown, with intent to defraud, knowingly devised a scheme and artifice to defraud  
14 and to obtain money and property by means of materially false and fraudulent pretenses,  
15 representations and promises, as further described below.

16 7. The essence of the scheme and artifice to defraud was to fraudulently  
17 obtain federally-funded PUA and other unemployment benefits from the Washington  
18 ESD and other state workforce agencies by submitting fraudulent claims using the stolen  
19 personal identifying information of American workers.

20 **C. Manner and Means**

21 The following conduct was part of the scheme and artifice to defraud:

22 8. RUFAL unlawfully obtained and possessed the personal identifying  
23 information (PII), to include names, dates of birth, and Social Security numbers, of  
24 residents of Washington and other states. RUFAL accessed, using interstate and foreign  
25 wire transmissions, ESD's SAW portal, as well as similar portals of other SWAs.  
26  
27  
28

1 9. RUFAl created email accounts, including a Google-administered account  
2 with the address “sandytangy58@gmail.com,” for the purpose of participating in  
3 fraudulent transactions while obscuring his identity.

4 10. RUFAl, using foreign and interstate wire transmissions, accessed ESD’s  
5 SAW portal, as well as similar portals of other SWAs. RUFAl provided the  
6 sandytangy58@gmail.com email address to ESD and other SWAs as the designated  
7 email addresses to receive activation emails from the SWAs to activate fraudulent claims.

8 11. To prevent ESD and other SWAs from recognizing that the same email  
9 account was being used to file multiple claims, RUFAl used dozens of variants of the  
10 email addresses by placing periods at different locations within the email address for each  
11 claim. For example, RUFAl opened SAW accounts and submitted claims using the  
12 variants “san.dyta.ngy58@gmail.com,” “sa.ndty.a.ngy58@gmail.com,” and  
13 “san.d.y.t.an.gy58@gmail.com.” This enabled RUFAl and his co-schemers to file  
14 multiple claims using the same email account, without ESD and other SWAs detecting  
15 that they were doing so.

16 12. When completing the applications, RUFAl directed that some of the  
17 benefits be paid to online payment accounts, including Green Dot accounts. In some  
18 cases, RUFAl directed that the fraudulent benefit payments be made to bank accounts  
19 controlled by “money mules” under the control of RUFAl and his co-schemers. RUFAl  
20 and his co-schemers then directed the money mules to send the proceeds to the residence  
21 of RUFAl’s brother in Jamaica, New York.

22 **D. Execution of the Scheme and Artifice to Defraud**

23 13. On or about the dates set forth below, in Olympia, within the Western  
24 District of Washington and elsewhere, for the purpose of executing and attempting to  
25 execute this scheme and artifice to defraud, ABIDEMI RUFAl, and others known and  
26 unknown, aiding and abetting each other, did knowingly transmit and cause to be  
27 transmitted by wire communication in interstate and foreign commerce, writings, signs,  
28

1 signals, pictures and sounds, each transmission of which constitutes a separate count of  
2 this Complaint:

| Count | Date      | Wire Transmission   |
|-------|-----------|---|
| 1     | 4/27/2020 | Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address san.dy.t.a.n.g.y.5.8@gmail.com |
| 2     | 4/28/2020 | Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address s.an.dyt.a.n.g.y.5.8@gmail.com |
| 3     | 4/29/2020 | Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address sa.n.d.yta.n.g.y.5.8@gmail.com |
| 4     | 5/1/2020  | Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address sandy.t.an.g.y.5.8@gmail.com   |
| 5     | 5/2/2020  | Wire transmission from outside the state of Washington to the State Data Center in Olympia, Washington to establish Secure Access Washington account using the email address s.a.nd.ytangy58@gmail.com      |

17 All in violation of Title 18, United States Code, Sections 1343 and Section 2.

19 And the complainant states that this Complaint is based on the following  
20 information:

21 I, Special Agent Andrea Desanto, being first duly sworn on oath, depose and say:

22 **AFFIANT BACKGROUND AND SCOPE OF AFFIDAVIT**

23 1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and  
24 have been since 2006. I am currently assigned to the Seattle Field Office. My primary  
25 duties include investigating violations of federal law, including but not limited to, Title  
26 18, United States Code, Sections 1343 (wire fraud), 1028A (aggravated identity theft),  
27 1956 (money laundering), 1957 (transactional money laundering), and conspiracy to  
28



1 | commit these offenses. I previously worked on the Cyber squad, where I primarily  
2 | investigated computer intrusions and other cybercrimes. My experience as an FBI agent  
3 | includes the investigation of cases involving the use of computers and the Internet to  
4 | commit crimes. In addition to my experience with cybercrime investigations, I also have  
5 | experience with financial investigations. I have received formal training on tracing the  
6 | financial proceeds of crimes. I have applied that training in the context of numerous  
7 | investigations in which I have reviewed records from financial institutions both in the  
8 | United States and in foreign jurisdictions, in order to identify the proceeds of criminal  
9 | offenses under investigation.

10 |         2.       Based on my training and experience, I am familiar with the ways in which  
11 | individuals involved in fraud schemes use shell e-mail accounts, computers, cellular  
12 | telephones, Internet Protocol (IP) addresses, bank accounts, synthetic identities, and  
13 | counterfeit documents to facilitate fraudulent activity. I have learned that individuals  
14 | perpetrating computer intrusions and identity theft-related bank fraud and wire fraud  
15 | schemes employ a number of techniques, either alone or in combination, to further their  
16 | illegal activities and to avoid detection by law enforcement. These techniques include:  
17 | utilizing web-based email accounts and other electronic messaging accounts to send,  
18 | receive, store, and obtain personal identifying information, such as dates of birth and  
19 | bank and credit card account numbers and related information; and the use of cloud-  
20 | based accounts to communicate and store information and tools related to the fraud. I  
21 | know that individuals involved in fraud schemes often establish shell e-mail accounts and  
22 | e-mail addresses in fictitious names and/or in the names of third parties in an effort to  
23 | conceal their identities and illicit activities from law enforcement. I know that  
24 | individuals involved in fraud often use virtual private network (“VPN”) accounts and  
25 | Internet hosting services to conceal their true identities and geographical locations from  
26 | law enforcement or other entities.

27 |         3.       The purpose of the Affidavit is to describe the evidence relevant to the  
28 | question of whether probable cause exists to believe that ABIDEMI RUFAl committed

1 the offenses set forth above. As a result, the information in this Affidavit is limited to  
2 that relevant to the existence of probable cause. This Affidavit does not set forth all facts  
3 known to me that are relevant to this investigation.

4 **EVIDENCE OF THE CRIMINAL OFFENSES**

5 **A. The CARES Act**

6 4. Based on publicly-available information, I know that on March 27, 2020,  
7 the United States enacted into law the Coronavirus Aid, Relief, and Economic Security  
8 (CARES) Act. The CARES Act authorized approximately \$2 trillion in aid to American  
9 workers, families, and businesses to mitigate the economic consequences of the COVID-  
10 19 pandemic. The CARES Act funded and authorized each state to administer new  
11 unemployment benefits. These benefits include (1) Federal Pandemic Unemployment  
12 Compensation (FPUC), which provides an additional benefit of \$600 per week per  
13 unemployed worker; (2) Pandemic Unemployment Assistance (PUA), which extends  
14 benefits to self-employed persons, independent contractors, and others; and (3) Pandemic  
15 Emergency Unemployment Assistance (PEUC), which extends benefits for an additional  
16 13 weeks after regular unemployment benefits are exhausted. All of these programs will  
17 be referenced herein as “CARES Act benefits.” The CARES Act allows an unemployed  
18 worker to obtain back benefits retroactive to the date on which the applicant was affected  
19 by COVID 19, which, under program rules, may be as early as February 2, 2020.

20 5. CARES Act unemployment benefits are funded by the United States  
21 government through the Department of Labor and administered at the state level by state  
22 agencies known as state workforce agencies (SWAs). The Washington Employment  
23 Security Department (ESD), the component of the State of Washington responsible for  
24 administering unemployment benefits, is the SWA for the State of Washington.  
25 Applicants apply for ESD-administered benefits using Washington’s SecureAccess  
26 Washington (SAW) web portal and an ESD-administered site known as the  
27 Unemployment Tax and Benefit (UTAB) system.

1           6.       Based on interviews with ESD personnel, I know that, to apply for ESD  
2 benefits online, a claimant must first open an account with the SAW system. The SAW  
3 system is a website hosted at the State Data Center in Olympia, Washington that verifies  
4 the identities of users. To open a SAW account, the applicant must access the SAW  
5 website, which causes a wire communication to the servers at the State Data Center. The  
6 applicant must provide SAW with basic identifying and contact information, to include  
7 an email account. The SAW system sends an activation link to the provided email  
8 account. The claimant must then access the email account and click the activation link to  
9 complete the SAW account setup process. Once that process is complete, the applicant  
10 may use his or her SAW account to access UTAB and submit a claim for ESD benefits.

11           7.       To submit an ESD claim through UTAB, the applicant must enter his or her  
12 personal identifying information (including name, date of birth, and Social Security  
13 number). ESD checks this information against its database of Washington residents. If  
14 ESD confirms that the information matches the personal identifying information of a  
15 person in ESD's records, ESD will pay out benefits via wire (ACH) transfer to an account  
16 identified by the applicant.

17 **B.     Overview of Investigation**

18           8.       I know from my contact with other law enforcement officers that,  
19 beginning on around April 20, 2020, officials began receiving complaints from  
20 employers about potentially fraudulent unemployment claims. The employers reported  
21 that they had received notices from ESD indicating that persons still under their employ  
22 had filed unemployment claims. For example, on or about April 20, 2020, the Seattle  
23 Fire Department (SFD) notified the U.S. Attorney's Office for the Western District of  
24 Washington that claims had been filed in the names of multiple firefighters who were  
25 actively employed by SFD. SFD reported that it had interviewed the firefighters, who  
26 had denied any involvement in the claims. Other employers, including Microsoft  
27  
28



1 Corporation, the City of Bellingham, Zulily, and Seattle Yacht Club submitted similar  
2 complaints.

3 9. Roughly around that same time, numerous other agencies, including the  
4 Federal Bureau of Investigation, the Social Security Administration Office of Inspector  
5 General, the United States Secret Service, the Department of Labor Office of the  
6 Inspector General, the United States Postal Inspection Service, and Internal Revenue  
7 Service Criminal Investigation, joined the investigation. Agents from these agencies,  
8 including myself, have reviewed voluminous financial records and databases reflecting  
9 the fraudulent transactions and have conducted dozens of interviews.

10 10. The investigation has developed evidence that hundreds of millions of  
11 dollars' worth of fraudulent claims were filed with ESD using the stolen personal  
12 identifying information of Washington residents. The FBI investigation has determined  
13 that many of the fraudulent claims were filed using IP addresses that resolve to Nigeria.  
14 While the actual amount of loss is unknown, the Washington State Auditor has issued a  
15 report finding that ESD paid out at least \$642,954,417 in fraudulent imposter claims, of  
16 which \$369,789,082 has been recovered.

### 17 **C. Role of Gmail Accounts in the Fraud**

18 11. ESD provided the government with data identifying the email accounts  
19 associated with claims submitted over the period of the fraud. The data indicate that  
20 thousands of different email accounts, including accounts operated by Google, were used  
21 in connection with the filing of the fraudulent claims. For many of these Google email  
22 accounts, perpetrators took advantage of a particular feature of Google email accounts  
23 that allowed them to submit multiple fraudulent claims from a single Google email  
24 account, without ESD detecting that a single email address was being used repeatedly.  
25 Specifically, in routing emails to an email box, Google disregards periods in the email  
26 address, meaning that the email address "john.doe@gmail.com" and  
27 "johndoe@gmail.com" will resolve to the same Google email account, even though ESD  
28

1 identifies them as two different accounts. Two email addresses like these that are  
2 distinguished only by periods are known as “Google variants” or “dot variants.” I know  
3 from my training and experience that criminals sometimes take advantage of this feature  
4 to make it appear that emails are originating from multiple accounts, when in fact they  
5 originate from the same account. This reduces the number of email accounts that a  
6 criminal must open and monitor while perpetrating a fraud, while avoiding fraud alerts  
7 that may be triggered when multiple claims originate from the same account.

8 **D. Use of the Sandytangy58@gmail.com Account**

9 12. Investigators analyzed ESD’s database to identify Gmail accounts that were  
10 used to submit multiple claims using the Google dot variant method discussed above.  
11 Among these accounts was an account with the address sandytangy58@gmail.com.

12 13. According to a Department of Labor Office of Inspector General’s Office  
13 analysis of ESD’s claims database, dot variants of sandytangy58@gmail.com (such as  
14 san.dyta.ngy58@gmail.com, sa.ndyt.a.ngy58@gmail.com, and  
15 san.d.y.t.an.gy58@gmail.com.) were used to submit approximately 102 claims for ESD  
16 benefits exceeding \$350,000. The Department of Labor’s analysis also indicates the  
17 account was used to submit one or more claims to the SWAs for Hawaii, Maine,  
18 Michigan, Missouri, Montana, New York, Ohio, Pennsylvania, Wisconsin, and  
19 Wyoming.

20 **E. Investigation of the Sandytangy58 SMS Number and Identification of**  
21 **Abidemi Rufai.**

22 14. On June 19, 2020, the government applied for, and the Honorable Paula L.  
23 McCandlis issued, an order pursuant to 18 U.S.C. § 2703(d) directing Google to produce  
24 non-content material associated with the sandytangy58@gmail.com account.

25 15. The 2703(d) order required Google to identify, *inter alia*, the recovery SMS  
26 number for the account. Based on my experience and open source research, I know that  
27 Google uses recovery SMS numbers as an alternate means to communicate with the  
28

1 account holder, including for purposes of two-step authentication and password recovery  
2 if the account holder forgets his or her password. I know from my training and  
3 experience that email account users ordinarily provide their own cell phone number as an  
4 SMS recovery number so that they can easily validate their account.

5 16. Google's response indicated that the recovery SMS number associated with  
6 sandytangy58@gmail.com was the Nigeria-based number 234-909-874-2695 (the  
7 "Sandytangy58 SMS Number"). Investigators conducted research into the Sandytangy58  
8 SMS Number. They determined that this number was listed on a 2019 visa application of  
9 a Nigerian man named ABIDEMI RUFAl. International travel records show that RUFAl  
10 entered the United States on February 19, 2020, and left the country on August 9, 2020,  
11 and was therefore apparently present in the United States during the period of the fraud.  
12 When RUFAl arrived in the United States, he reported to the U.S. government that he  
13 would be staying at his brother's apartment on Guy R. Brewer Boulevard in Jamaica,  
14 New York.

15 17. I have reviewed financial reporting showing that, between March 3, 2020  
16 and August 2, 2020, a Citibank checking account in RUFAl's name received a total of  
17 \$288,825 in deposits. \$236,701 was transferred out of the account over the same period.

18 18. I have reviewed information from a financial institution reporting that on  
19 May 19, 2020, a Richland, Missouri resident with the initials C.S. received an ACH  
20 transfer of unemployment benefits from ESD in the amount of \$9,920. ESD records  
21 indicated that this payment was based on a claim submitted to ESD on May 18, 2020, in  
22 the name of a Washington resident with the initials M.S. using the email address  
23 s.a.n.dy.t.an.gy58@gmail.com. Also on May 19, 2020, C.S.'s account received two ACH  
24 transfers totaling \$8,650 from the Maine Department of Labor. When questioned by her  
25 credit union about the transfers, C.S. stated that she had withdrawn \$11,000 of the funds  
26 and sent them to an address on Guy R. Brewer Boulevard in Jamaica, New York. The  
27 address C.S. provided is RUFAl's brother's apartment. On May 10, 2021, M.S. told  
28

1 | investigators he had never filed an unemployment claim or given anyone permission to  
2 | do so on his behalf.

3 | **F. Contents of the Sandytangy58@gmail Account**

4 | 19. On January 29, 2021, the Honorable Michelle L. Peterson issued a search  
5 | warrant to Google for the sandytangy58@gmail.com account. Google responded to the  
6 | search warrant on approximately February 5, 2021.

7 | 20. *Evidence of Fraud in the Account:* The contents of the  
8 | sandytangy58@gmail.com account included over 1,000 emails from ESD, including the  
9 | automated activation emails that the SAW system sends when new user sets up an  
10 | account. The account also contained approximately 100 emails from the SWAs for  
11 | Hawaii, Wyoming, Massachusetts, Montana, New York, and Pennsylvania. The account  
12 | also contained numerous emails from Green Dot, which is a payment system that I know  
13 | was used to collect and transfer a large share of the claims that were filed with ESD using  
14 | the sandytangy58@gmail.com account. In addition, the sandytangy58@gmail.com  
15 | account contained numerous emails from other online payment and cryptocurrency  
16 | services.

17 | 21. In addition, the sandytangy58@gmail.com account contained substantial  
18 | evidence that the user was actively engaged in stealing and retaining the personal  
19 | identifying information of American citizens. The account contained large volumes of  
20 | emails and file attachments with thousands of bank and credit card numbers, personal  
21 | identifying information such as dates of birth and U.S. addresses associated with first and  
22 | last names, and images of what appear to be driver licenses from various states, including  
23 | New York. The account also contained a very large volume of tax returns of United  
24 | States taxpayers. In many of the emails, the user appears to pose as an accountant,  
25 | signing the email "Sandy Tang CPA."

26 | 22. The sandytangy58@gmail.com account also contained emails indicating  
27 | that the user had submitted other types of fraudulent claims to the United States  
28 |



1 government. For example, the account contained numerous emails from the Federal  
2 Emergency Management Agency (FEMA) from September 2017, which appears to  
3 indicate that the user had filed multiple claims for disaster relief during this period. The  
4 account also contained emails from an online tax filing service indicating that the user  
5 had filed tax returns in the United States.

6       23. ***Additional Evidence Linking Account to RUFAl:*** In response to the  
7 January 2021 search warrant, Google also provided the contents of the Google Drive  
8 account associated with the sandytangy58@gmail.com account. Google Drive allows  
9 users to store documents, files, and other content online so that they can be remotely  
10 accessed from anywhere. The Google Drive documents associated with the  
11 sandytangy58@gmail.com account included four images of an individual who matches  
12 the physical appearance of RUFAl in his 2019 visa application photo and secondary  
13 inspection photos taken by U.S. Customs and Border Patrol on and January 19, 2017, and  
14 February 18, 2020. In addition, the contact list for the sandytangy58@gmail.com  
15 account included the email address bidemi.rufai@yahoo.co.uk, a variation of the email  
16 address listed on RUFAl's visa application (bidemi\_rufai@yahoo.co.uk).

17       24. The sandytangy58@gmail.com account also included three confirmation  
18 emails from online purchases that list RUFAl's brother's address on Guy R. Brewer  
19 Boulevard in Jamaica, New York, as the billing address. For example, the account  
20 contains a January 26, 2017 email string in which the user of the  
21 sandytangy58@gmail.com account purchased a license to use Sigma Tax Pro software.  
22 The billing information on the invoice is "Thuy Le, Sandy S Tang CPA," and lists  
23 RUFAl's brother's address on Guy R. Brewer Boulevard as the billing address.  
24 Similarly, the sandytangy58@gmail.com account was used to purchase a Verizon  
25 wireless refill on February 14, 2017. The billing address for the order is "James Andrus"  
26 at the Guy R. Brewer address. Of note, U.S. Customs and Border Patrol records show  
27 that RUFAl arrived in New York on January 19, 2017 and remained in this country until  
28 May 4, 2017, and therefore was in the country for the period of these transactions.



1 **G. Evidence Relevant to Charged Wire Transmissions and Uses of Stolen**  
 2 **Identities.**

3 25. As discussed above, the sandytangy58@gmail.com account contains emails  
 4 from the Washington SAW system. Some of these emails contain activation links sent by  
 5 the SAW system. I know from my interviews with ESD personnel that SAW sends these  
 6 activation emails at the time the user creates a SAW account. Therefore, each email  
 7 containing an activation link was immediately proceeded by the user accessing the SAW  
 8 system by a wire transmission terminating in Olympia, Washington. Because RUFAl  
 9 was staying in New York between February 19, 2020 and August 9, 2020, each of these  
 10 wire transmissions travelled from outside of Washington to Olympia, Washington. The  
 11 table below sets out five examples of these emails, including the date and the dot variant  
 12 used in the SAW submissions.

| Date      | Address Reflected "To" Line of Email |
|-----------|--------------------------------------|
| 4/27/2020 | san.dy.t.a.n.g.y.5.8@gmail.com       |
| 4/28/2020 | s.an.dyt.a.n.g.y.5.8@gmail.com       |
| 4/29/2020 | sa.n.d.yta.n.g.y.5.8@gmail.com       |
| 5/1/2020  | sandy.t.an.g.y.5.8@gmail.com         |
| 5/2/2020  | s.a.nd.ytangy58@gmail.com            |

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 19 26. The evidence discussed above establishes probable cause to believe that:  
 20 (1) the sandytangy58@gmail.com account was used to submit fraudulent claims to ESD  
 21 and other states; (2) ABIDEMI RUFAl is the operator of the sandytangy58@gmail.com  
 22 account; and (3) some of the proceeds of claims filed using the account were mailed to  
 23 the New York address where RUFAl was staying during the period of the fraud. Based

24 //

25 //

1 on all of this evidence, there is probable cause to believe that ABIDEMI RUFAl  
2 committed the offenses alleged above.

3  
4 *s/ Andrea L. Desanto*  
5 ANDREA L. DESANTO  
6 Complainant  
7 Special Agent, FBI

8 The above-named agent provided a sworn statement attesting to the truth of the  
9 contents of the foregoing affidavit by telephone on this 14th day of May, 2021. The Court  
10 hereby finds that there is probable cause to believe the Defendant committed the offense  
11 set forth in the Complaint.

12 

13 \_\_\_\_\_  
14 THE HONORABLE DAVID W. CHRISTEL  
15 United States Magistrate Judge  
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