
UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

UNITED STATES OF AMERICA

Case No.:

20-5300MS

v.

CRIMINAL COMPLAINT

Celestine Strong (Counts 1,2 and 6),
Ty'zhaun Lewis (Counts 1,4),
Patrick Lewis (Counts 1,3); and
Jawuan Polk (Counts 1,5).

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

Count 1: Conspiracy, 18 U.S.C. § 1349

Between April 2020, through at least June of 2020, within the District of Arizona and elsewhere, the defendants Celestine Strong, Ty'zhaun Lewis, Patrick Lewis, and Jawuan Polk, and others known and unknown, did knowingly and willfully agree and conspire with each other to commit wire fraud.

This conduct is in violation of Title 18, United States Code, § 1349.

Manner/Means of the Conspiracy/Scheme to Defraud

This scheme targeted financial institutions with the intention of defrauding these institutions of funds in connection to the CARES Act Paycheck Protection Program by providing material false loan applications claiming seemingly made up wages and employees for business entities owned and operated by the co-conspirators. In furtherance of the conspiracy and scheme to defraud, the co-conspirators submitted supporting loan documents that were similar to one another, and sometimes contained the same

information. These communications were all done by common Internet Protocol addresses and fraudulently represented altered bank statements and Internal Revenue Service payroll records. These representations were false and fraudulent. In reality, the co-conspirators merely made these false and fraudulent representations with the intent to defraud solely to obtain loan proceeds they were not entitled to.

Count 2 - 5: Wire Fraud, 18 U.S.C. § 1343

Between April 2020 and June 2020, in Maricopa County, in the District of Arizona, Celestine Strong, Ty'zhaun Lewis, Patrick Lewis, and Jawuan Polk did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent promises, pretenses and representations, and concealment of material facts, in violation of Title 18, U.S.C. § 1343.

On or about the dates specified as to each count below, the defendants Celestine Strong, Ty'zhaun Lewis, Patrick Lewis, and Jawuan Polk, for the purpose of executing the aforesaid scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, as more particularly described below.

Count	Date	Requestor / Amount	Originating IP Address	Receiving Server
2	04/14/2020	Celestine Strong \$279,165	2600:8800:3880:8f8:: Phoenix, AZ	PayPal Wilmington, DE Conshohocken, PA or Timonium, MD
3	05/20/2020	Patrick Lewis \$300,000	173.44.244.196 Phoenix, AZ	PayPal Wilmington, DE Conshohocken, PA

				or Timonium, MD UT
4	05/26/2020	Ty'zhaun Lewis \$297,500	173.44.244.196 Phoenix, AZ	PayPal Wilmington, DE Conshohocken, PA or Timonium, MD
5	06/06/2020	Jawuan Polk \$208,332	173.44.244.196 Phoenix, AZ	PayPal Wilmington, DE Conshohocken, PA or Timonium, MD

This conduct is in violation of Title 18, U.S.C. § 1343.

Count 6: Transactional Money Laundering, 18 U.S.C. § 1957

On or about May 1, 2020, Strong received a wire in the amount of \$279,165.00 into her Wells Fargo checking account ending in 7989. The wire was initiated by WebBank, which utilized Zions Bancorporation wire services to facilitate the wire. This wire deposit into Strong's Wells Fargo checking account represents the proceeds of the PPP fraud scheme described above.

On or about May 1, 2020, the balance in the account ending in 7989 was a negative \$18.70 and had just incurred two overdraft fees of \$35.00 each.

On or about May 6, 2020, two cash withdrawals were made at two separate Wells Fargo branch locations. The first cash withdrawal was in the amount of \$30,000.00 and was made at a branch located in Phoenix, AZ. The second cash withdrawal was in the amount of \$5,000.00 and was made at a branch located in Chandler, AZ.

On or about May 6, 2020, Strong made a cash purchase of the 2016 Mercedes. The purchase price of the vehicle was \$29,200.00. A form 8300 was filed by Mercedes Benz of Gilbert reflecting the cash purchase by Strong of the 2016 Mercedes.

On or about May 6, 2020, in the District of Arizona and elsewhere, Defendant Strong knowingly engaged in a monetary transaction by withdrawing \$30,000 in U.S. currency from her checking account ending in 7989, within the United States by, through, or to a financial institution, namely Wells Fargo Bank, affecting interstate commerce, in criminally derived property that was of a value greater than \$10,000, such property having been derived from wire fraud in violation of Title 18, U.S.C. § 1343.

This conduct is in violation of Title 18, U.S.C. § 1957.

I further state that I am a Special Agent with the Homeland Security Investigations and this complaint is based on the following facts:

See Attached Statement of Probable Cause Incorporated By Reference Herein.

Continued on the attached sheet and made a part hereof: Yes No

AUTHORIZED BY: Kevin Rapp, AUSA

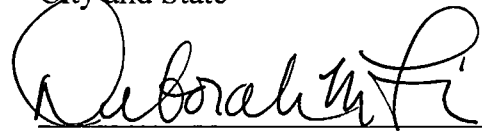
Special Agent Byron Anderton
Name of Complainant

Digitally signed by BYRON W ANDERTON
ANDERTON
Date: 2020.12.14 09:26:42 -07'00'
BYRON W ANDERTON
Signature of Complainant

Sworn to telephonically
Dec. 14, 2020 @ 2:33 pm
Date

at Phoenix, Arizona
City and State

United States Magistrate Judge
HONORABLE DEBORAH M. FINE


Signature of Judicial Officer

STATEMENT OF PROBABLE CAUSE

I, Byron Anderton, being first duly sworn, hereby depose and state as follows:

I. Affiant's Background

1. I am a Special Agent with U.S. Immigration and Customs Enforcement ("ICE") Homeland Security Investigations ("HSI") currently serving in the Phoenix Field Office, Financial Crimes Unit. I have been employed as a federal agent for over fifteen (15) years. I have conducted numerous criminal investigations involving violations of Immigration and Customs law committed against the United States, such as financial crimes, weapons violations, narcotics violations, document and benefit fraud, and human smuggling. Recently, I have been assigned to work with other law enforcement partners to investigate possible fraud associated with the stimulus and economic assistance programs created by the federal government in response to the COVID-19 pandemic.

II. Purpose of Affidavit

2. This affidavit is made in support of a criminal complaint charging Celestine Strong, Ty'zhaun Lewis, Patrick Lewis, and Jawuan Polk with 18, U.S.C. § 1343 (Wire Fraud) and 18, U.S.C. 1349 (Conspiracy), and Strong with a violation of 18 U.S.C. §1957 (Transactional Money Laundering).

3. This affidavit is based on my personal investigation and investigation by others, including federal and local law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by interviewing witnesses and examining documents obtained in the course of the investigation as well as through

other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

III. Background Information and Summary of Criminal Activity

4. On March 27, 2020, the U.S. President signed a \$2 trillion stimulus bill called the CARES Act, which was intended to ameliorate the economic impact of the COVID-19 Pandemic. *See* Pub. L. 116-136. The CARES legislation authorized up to \$349 billion in forgivable loans to small businesses to pay their employees during the pandemic. On or around April 2020, Congress authorized up to \$310 billion of additional funding. *See* Pub. L. 116-139. This loan program is known as the Paycheck Protection Program (“PPP”) and is administered by the U.S. Small Business Administration (“SBA”), a federal government agency headquartered at 409 3rd Street, SW, Washington, D.C. 20416. *See* 13 C.F.R. Part 120. The PPP provides small businesses with funds to pay up to eight weeks of payroll costs, including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. The SBA provides funds in the form of loans that may be fully forgiven if used for payroll costs, interest on mortgages, rent, and utilities (the program requires that at least 75% of the loan amount be used for payroll costs to be considered for forgiveness). Under the PPP, the maximum loan amount for which an applicant may apply is the lesser of \$10 million or an amount based upon a payroll-based formula specified in the CARES Act.

5. Small businesses and sole proprietorships have applied for PPP relief through one of over 4,900 SBA designated lending institutions. To apply, applicants must complete and transmit to the lender an SBA Form 2483, which requires the applicant to identify the entity’s average monthly payroll, as calculated according to the requirements of the

CARES Act.

6. Once a borrower provides their application to a lender, the lender underwrites the loan and transmits the application to the SBA via an electronic platform known as ETRAN. Before a lender submits a PPP loan through ETRAN, the lender must have collected the information and certifications set forth in the SBA Form 2483. Loans guaranteed under the PPP will be 100% guaranteed by the SBA, and the full principal amount of the loans may qualify for loan forgiveness.

7. An Internet Protocol Address (“IP Address”) is an address on in which computers communicate over the internet, similar to that of a street address on your house. There are two (2) types of IP addresses currently in use, IP address version 4 (“IPv4”)and IP address version 6 (“IPv6”).

- a. IPv4 is made up of four numbers (referred to as ‘octets’) separated by the “period” character. An example of this is 72.200.20.169. Due to the number of devices on the Internet today, IPv4 was running out of numbers, so IPv6 addresses were implemented.
- b. IPv6 is made up of 8 “chunks” of alpha-numeric values (referred to ‘hextets’) and are separated by the “colon” character. An example of this is 2600:8807:7f02:0:98f9:68de:f4e4:b618. Unlike IPv4 addresses, there are plenty of IP addresses that can be assigned and we won’t run out. Because of this amount, and software/hardware limitations of the Internet, the most common scenario is for a Internet Service Provider (“ISP”), like AT&T or Cox Communications, is to assign a large amount of IPv6 addresses to one

subscriber. Specially, according to the Regional Internet Registries providing Internet resource allocations, it is common for ISPs to assign one half of an IPv6 address (the first 3 or 4 “chunks” or “hextet”) to a specific subscriber. Meaning, the last 4 “chunks/hextets” don’t matter. This means that the same subscriber is usually assigned IPv6

2600:8807:7f02:0:98f9:68de:f4e4:b618 and

2600:8807:7f02:0:585F:68de:f4e4:A23.

A. PAYCHECK PROTECTION PROGRAM (PPP) LOAN APPLICATIONS

“Transitions Studio and Spa”

8. WebBank is a Federal Deposit Insurance Corporation (FDIC) financial institution and is the lender for PayPal Working Capital and PayPal Business Loans. PayPal has servers for servicing their customers PPP loan applications, located in Wilmington, DE, Conshohocken, PA, and Timonium, MD. WebBank participates in the SBA’s PPP loan program as an SBA Preferred Lender. WebBank provided me an SBA Form 2483 (“the application”) submitted on or about April 14, 2020 and bearing the signature of Strong; as referenced in Count 2 in the table above. The application sought a PPP loan for an LLC identified as Transitions Studio and Spa located at 7037 E. 1st Ave. Scottsdale, AZ. The application identified Strong as owning 100% of the LLC. Strong listed her address as 2618 W. Spencer Run, Phoenix, AZ 85041. According to the Arizona Corporation Commission, Transitions Studio and Spa was formed / registered on or about April 27, 2020 and lists T. Lewis as the statutory agent and T.V. as the manager. In order to support a PPP loan in the amount of \$279,165.00, the application represented that the

LLC, Transitions Studio and Spa has an average monthly payroll of \$111,666.00 and 20 employees.

9. The following information is in support of Count 2 listed above. On or about May 1, 2020, WebBank, utilizing the wire services of Zions Bancorporation, wired \$279,165.00 to Wells Fargo account 7989. Account 7989 is a personal checking account in the name Celestine Strong with a mailing address listed as 2618 W. Spencer Run, Phoenix, AZ 95041.

10. On or about May 5, 2020, Strong made a withdrawal of \$65,010.00 utilizing the purchase of a bank check.

11. On or about May 6, 2020, Strong made a withdrawal of \$11,310.90 utilizing the purchase of a bank check.

12. The following information is in support of Count 6 listed above. On or about May 6, 2020, Strong made a cash withdrawal of \$30,000.00 at a Wells Fargo branch located in Phoenix, AZ.

13. On or about May 6, 2020, Strong made a cash withdrawal of \$5,000.00 at a Wells Fargo branch located in Chandler, AZ.

14. On or about May 6, 2020, Strong made a cash purchase of the 2016 Mercedes. The purchase price of the vehicle was \$29,200.00. A form 8300 was filed by Mercedes Benz of Gilbert reflecting the cash purchase by Strong of the 2016 Mercedes.

15. A review of Strong's Wells Fargo account ending in 7989 showed no additional deposits beyond the \$279,185.00 made on May 1, 2020.

16. The funds Strong used to purchase the 2016 Mercedes are traceable to the PPP fraud scheme described above.

17. On or about May 7, 2020, Strong made a withdrawal of \$17,010.00 utilizing the purchase of a bank check.

18. According to IRS records, Transitions Studio and Spa LLC was issued an Employer Identification Number (“EIN”) in December 2011. Contrary to what Strong provided on her PPP loan application purporting an average monthly payroll of \$111,660.00 with 20 employees, IRS records did not have any Form 941 *Employer’s Quarterly Federal Tax Return* on file under Transitions Studio and Spa LLC’s EIN 45-4096434. The Form 941 is used by employers to report the employer and employee share of social security tax and Medicare tax, withheld federal income tax, and, if applicable, withheld Additional Medicare tax.

19. WebBank has provided several documents it received in support of the Transitions Studio and Spa LLC PPP loan application. A review of those documents and records obtained from the IRS, demonstrate that several of the documents provided to WebBank in support of the PPP loan application were falsified and/or included false statements about Transitions Studio and Spa LLC’s operations:

- a. The applicant submitted JP Morgan Chase bank statements for account 1483 in the name Celestine Strong/Transitions Studio and Spa LLC. The statements appear to be altered with formatting not consistent with legitimate JP Morgan Chase bank statements.
- b. A review of withdrawals on the bank statements show inaccurate totals, for

example:

11-Jan	Online Payment Vendor	\$ 8,928.00
11-Jan	Online Payment Vendor	\$ 12,960.00
25-Jan	Online Payment Vendor	\$ 29,250.00
30-Jan	ADP	\$ 12,887.68
Total		\$ 85,913.00

(Accurate Sum total is **\$64,025.68**)

- c. A review of the Checking Summary section of the statement shows inconsistencies with checks paid. For example:
- Checks paid for the month of January in the Check Summary, lists 2 checks. In the transactions section of the statement, 3 checks are listed. In addition, the check numbers have been omitted in the statements.
- d. According to JP Morgan Chase, there is no record of account 1483 in the name Celestine Strong/Transitions Studio and Spa LLC at their bank.
- e. A review of the payroll verification documents provided by Strong, show no change in payroll expense to include tips and no employee turnover. The monthly payroll expenditure is \$109,084.00 each month over a one-year period. This amount is not consistent with the loan applications Form 2483, which lists monthly payroll expenditures as \$111,666.00.
- f. The application submitted a spreadsheet document, which purported to show totals of payroll expenditures and tax payments for Transitions Studio and Spa LLC employees between approximately January 1, 2019, through December 31, 2019. This document claimed the business had 17 employees;

however, the Form 2483 for the loan application lists 20 employees. None of the employees listed on these files appear to be affiliated with this business or receiving payroll for Transitions Studio and Spa LLC.

20. A physical site check of the business address for Transitions Studio and Spa located at 7037 E. 1st Ave. Scottsdale, AZ 85251, does not list a business matching the name Transitions Studio and Spa.

21. A review of the Department of Economic Security (DES) payroll records for both Strong and Transitions Studio and Spa LLC revealed no records/wages for Strong or Transitions Studio and Spa.

22. Strong's signed Form 2438 *Paycheck Protection Program_Borrow Application Form* electronically on April 26, 2020 using DocuSign technologies. As part of the application, Strong certified by initialing next to an item which read "The Applicant was in operation on February 15, 2020 and had employees for whom it paid salaries and payroll taxes or paid independent contracts, as reported on Form (s) 1099-MISC." Strong also initialed next to a certification which read, "I further certify that the information provided in this application and the information provided in all supporting documents and forms is true and accurate in all material respects. I understand that knowingly making a false statement to obtain a guaranteed loan from SBA is punishable under the law, including 18 USC 1001 and 3571 by imprisonment of not more than five years and/or a fine of up to \$250,000.00; under 15 USC 645 by imprisonment of not more than two years and/or a fine of not more than \$5,000.00; and, if submitted to a federal insured institution, under 18 USC 1014 by imprisonment of not more than thirty years and/or a fine of not

more than \$1,000,000.00..”

“NSIDECONNEX, LLC”

23. The following information is in support of Count 3 of the Complaint. The investigation determined that between May 12, 2020 and June 20, 2020, P. Lewis applied for 6 PPP loans with WebBank through PayPal totaling \$1,767,920.00. The business loans were for a logistics trucking company under the name NSIDECONNEX LLC. The “Business Tax Id Number” listed on the application for the business was shown as “5819.” IRS records showed the EIN for NSIDECONNEX LLC was 85-1015819 and was issued in May 2020.

24. The following table outlines PPP loan applications submitted by P. Lewis for NSIDECONNEX LLC.

Date / Time	IP Address	Requested Loan Amount
05/12/2020 at 6:59 p	2600:8800:3880:60b::	\$275,000
05/20/2020 at 9:41 a	173.44.244.196	\$300,000
05/23/2020 at 8:18 a	38.131.113.188	\$297,500
06/15/2020 at 6:57 p	2600:8800:3880:d25::	\$300,000
06/20/2020 at 6:33 a	98.186.221.166	\$297,710
06/20/2020 at 8:53 p	98.186.222.201	\$297,710
		\$1,767,920

25. In support of the PPP loan applications, P. Lewis provided documents that appeared to be fictitious or were inconsistent with official records kept by financial institutions, to include:

- a. According to the Arizona Corporation Commission, NSIDE CONNEX LLC was formed/registered on or about May 15, 2020 and lists P. Lewis as the statutory agent and manager.

- b. Payroll documents for one of the loans showed inconsistencies with regard to the number of employees listed for the business. An undated document lists 8 employees, the Form 941 submitted lists 17 employees, and the loan application lists 10 employees.
- c. An Excel Spreadsheet was used to provide substantiation of NSIDECONNEX LLC's alleged payroll. Of the spreadsheets submitted on the loans outlined above, 5 were authored by a creator "bitchmode" with the other being created by author "highly favored." By default, a spreadsheet's author is the username of the individual who created the spreadsheet. In addition, 3 of the spreadsheets were created on April 13, 2020 at 1:30 pm, with the other 3 having been created on May 19, 2020 at "16:52." This same author and modified by combination was also used on loans submitted for business entities Flav or Flatline LLC and TL Solutions and Services.
- d. P. Lewis provided a picture of the first page of a Form 941 in support of a PPP loan applied for on May 23, 2020. Line 1 on the form listed 17 employees with total wages January, February, and March 2020 of \$109,080.00. The top portion of the form was filled out by hand in blue ink and contained the EIN 85-1015918, which contained two numbers that appeared to have been transposed. The correct EIN for NSIDECONNEX LLC was 85-1015819.
- e. A picture of the first page of a Form 941 was provided by P. Lewis in support of a PPP loan applied for on June 20, 2020. This form appeared to be similar

to a previous submission conducted by P. Lewis, but the top of the form contained white out over the year 2020, with a change to 2019.

- f. IRS Records did not show or reflect any Form 941 having been filed under NSIDECONNEX LLC's EIN.
- g. No records with USDOT were located with regard to P. Lewis and NSIDE CONNEX LLC.
- h. Due to the inconsistencies, all 6 loans were declined by WebBank.

“TL Solutions and Services”

26. The following information is in support Count 4 of the Complaint. The investigation determined that between May 25, 2020 and June 6, 2020, T. Lewis applied for 4 PPP loans with WebBank through PayPal totaling \$1,057,500.00. The loans were for a business listed as TL SOLUTIONS AND SERVICES LLC. The “Business Tax Id Number” listed on the application for the business was shown as “9593.” IRS Records showed the EIN for TL SOLUTIONS AND SERVICE LLC was 81-2649593 and was assigned in May 2016. IRS Records also do not show or reflect any Form 941 having been filed by TL SOLUTIONS AND SERVICES LLC.

Date / Time	IP Address	Requested Loan Amount
05/25/2020 at 12:32 am	2600:8800:3880:60b::	\$162,500
05/26/2020 at 8:568 pm	173.44.244.196	\$297,500
06/04/2020 at 12:39 am	2600:387:8:9:93	\$297,500
06/06/2020 at 5:52 am	173.44.244.196	\$300,000
		\$1,057,500

27. According to the Arizona Corporation Commission, TL SOLUTIONS AND SERVICES was formed / registered on or about May 22, 2020 and lists T. Lewis as the

statutory agent, member, and manager. On the loan application, T. Lewis listed his address as 2618 W. Spencer Run, Phoenix, AZ 85041. 2618 W. Spencer Run, Phoenix, AZ 85041 is the same address listed for Strong on her PPP loan application for Transitions Studio and Spa.

28. As part of his PPP loan applications, T. Lewis provided the following documents that contained irregularities and inconsistencies:

- i. T. Lewis has an Arizona Driver License (D08600171) with a listed address as 2618 W. Spencer Run, Phoenix, AZ 85041.
- j. As part of his PPP loan application, T. Lewis submitted altered JP Morgan Chase bank statements for account 8798.
- k. T. Lewis provided statements titled "Chase Business Checking", however the format of the statements was JP Morgan Chase personal checking format. T. Lewis' name is listed as the account holder and the business name is not listed on the statements.
- l. The font used on the "Chase Business Checking" is not consistent with font used by JP Morgan Chase business checking accounts.
- m. JP Morgan Chase confirmed that account 8798 is for a Chase College Checking account and not a Chase Business Checking account.
- n. Payroll register spreadsheets were similar to that provided for loans submitted by Strong, P. Lewis, and Polk. The author and modified by names listed on the spreadsheet was also shown as "bitchmode."
- o. Due to the inconsistencies, the loan was declined.

“FLAV OR FLATLINE ENTERTAINMENT LLC”

29. The following information is in support of Count 5 of the Complaint. The investigation determined that between June 06, 2020 and June 25, 2020, Polk applied for 5 PPP loans with WebBank through PayPal totaling \$1,374,172.00. The business loans were for an entertainment company operating under the name FLAV OR FLATLINE ENTERTAINMENT, LLC. According to the Oregon Secretary of State Corporation Division, FLAV OR FLATLINE ENTERTAINMENT LLC was formed / registered on or about November 01, 2019 and lists Polk as the registered agent and member. The EIN listed for the business was 84-3557805 and was issued by the IRS in November 2019.

Date / Time	IP Address	Requested Loan Amount	
06/06/2020 at 1:00 a	173.44.244.196	\$208,332	paid on 06/30/20
06/06/2020 at 2:18 a	2600:8800:3880:d25::	\$272,710	
06/19/2020 at 7:00 a	2600:8800:3880:d25::	\$297,710	
06/24/2020 at 1:36 p	68.105.138.198	\$297,710	
06/25/2020 at 8:15 a	98.186.224.144	\$297,710	
		\$1,374,172	

- a. On or about June 30, 2020, WebBank, utilizing the wire services of Zions Bancorporation, wired \$208,332.00 to NBKC bank account 3521. Account 3521 is a business checking account in the business name FLAV OR FLATLINE ENTERTAINMENT LLC with a mailing address listed as 73 NE Cook St. Portland, OR 97212. Polk is listed as the owner on the account and has signatory authority.

30. As part of the aforementioned loan application, Polk provided the following documents that contained inconsistencies and irregularities:

- b. On SBA Form 2483 *Paycheck Protection Program Borrower Application*

Form signed by POLK on June 27, 2020, he listed an average monthly payroll of \$83,333.00 for 10 employees. Polk provided a spreadsheet reflecting payroll expenditures of \$119,084.00 a month.

- c. A picture of a bank statement from NBKC Bank for account number 8223521. The business name, address, and account number appeared to be altered on the picture taken of the statement.
- d. The spreadsheet provided by Polk to substantiate the payroll for Flav or Flatline Entertainment LLC was consistent with those having been submitted by Strong, P. Lewis, and T. Lewis. The author listed on the spreadsheet was shown as “bitchmode.”

B. Further Investigation of IP Address

31. Internet Protocol (IP) Address 2600:8800:3880:d25:: and 173.44.244.196 referenced above were both used to apply for loans by P. Lewis, T. Lewis, and Polk.

32. IP Address 2600:8800:3880:8f8:: was used by Strong to submit her application and is consistent with IPv6 IP address 2600:8800:3880:d25:: used by Polk, P. Lewis, and T. Lewis. The Internet Service Provider for both IP addresses is Cox Communications. Please reference IPv6 guidelines as outlined in Paragraph 4(b) above.

IV. Conclusion

33. Based on my training and experience, and the information provided in this affidavit, I respectfully submit that there is probable cause to believe that beginning on a date unknown, but from at least in or around April 2020, to June 2020, within the District of Arizona, Celestine Strong, Ty’zhaun Lewis, Patrick Lewis, and Jawuan Polk committed

violations of 18, U.S.C. § 1343 (Wire Fraud), 18, U.S.C. 1349 (Conspiracy), and Strong with a violation of 18 U.S.C. §1957 (Transactional Money Laundering).


I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and belief.

BYRON W
ANDERTON

Digitally signed by BYRON W
ANDERTON
Date: 2020.12.14 09:27:44 -0700

Special Agent Byron Anderton
Homeland Security Investigations

Sworn to and subscribed before me this 14th day of December, 2020. @ 2:33 pm


HONORABLE DEBORAH M. FINE
United States Magistrate Judge