

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America
v.

JERICCA ROSADO,

Case No. 21-6145-Hunt

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 26, 2020 - December 10, 2020 in the county of Broward in the Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 1343 and 2	Wire fraud
18 U.S.C. §§ 1344 and 2	Bank fraud
18 U.S.C. § 1349	Conspiracy/attempt to commit wire fraud/bank fraud

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

David Passonno

Complainant's signature

SA David Passonno, IRS-CI

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Telephone

Date: 3/15/2021

Patrick M. Hunt

Judge's signature

City and state: Fort Lauderdale, Florida

Hon. Patrick M. Hunt, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, David Passonno, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this Affidavit in support of a criminal complaint charging JERICCA ROSADO (“ROSADO” or “Defendant”), with wire fraud, bank fraud, and attempt and conspiracy to commit wire fraud and bank fraud, in violation of 18 U.S.C. §§ 1343, 1344, 1349, and 2, from on or about May 26, 2020, to at least on or about December 10, 2020, in the Southern District of Florida, and elsewhere (the “Target Offenses”).

2. Defendant has participated in a scheme to obtain by fraud millions of dollars in forgivable loans through the Paycheck Protection Program (“PPP”) and other government programs, conspiring with a person now cooperating with the investigation (“CHS 2”), Devonte Thames, and others. Defendant obtained at least two kickback payments from fraudulent PPP loans for two companies. CHS 2 provided falsified documents and submitted the applications for those companies in exchange for separate kickback payments from the loan proceeds. Defendant also conspired to receive additional kickback payments for fraudulent PPP loan applications for other companies by recruiting other confederate loan applicants. Defendant also directed kickback payments from PPP loan proceeds to other co-conspirators and their businesses. To inflate the size of these PPP loans, and the corresponding kickbacks, the conspirators relied on a variety of false statements, including by submitting falsified bank statements and payroll tax forms. For example, the conspirators used nearly identical versions of the same fabricated bank statements, recycled in the PPP applications for multiple companies with minor changes.

3. The conspirators in the scheme planned or prepared at least 90 fraudulent applications, most of which were submitted. Based on the evidence investigators have reviewed

to date, CHS 2, Defendant, and their co-conspirators applied for PPP loans that are together worth more than \$34 million, with at least approximately 42 of those loans approved and funded for a total of approximately \$17.6 million. Certain of those loan recipients then wired a kickback of varying amounts, often approximately 25% of the fraudulent loan proceeds, to an account controlled by CHS 2.

4. I am a Special Agent with the United States Department of the Treasury, Internal Revenue Service, Criminal Investigation (“IRS-CI”) and have been employed in this capacity since December 2018. I am presently assigned to the Miami Field Office. My duties as a Special Agent include the investigation of possible criminal violations of the Internal Revenue Code (Title 26 of the United States Code), the Bank Secrecy Act (Title 31 of the United States Code), and the Money Laundering Statutes (Title 18 of the United States Code). I graduated from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in April 2019 and the Special Agent Investigative Techniques program at the National Criminal Investigation Training Academy in December 2019. In these two programs, I studied a variety of law enforcement tactics and criminal investigator techniques relating to tax and financial crimes. Since becoming an IRS-CI Special Agent, I have personally investigated and assisted in investigations relating to the Internal Revenue Laws and financial crimes. Recently, I have been assigned to work with the U.S. Department of Justice and other law enforcement partners, including the Federal Bureau of Investigation and the Small Business Administration Office of Inspector General, to investigate possible fraud associated with the stimulus and economic assistance programs created by the federal government in response to the COVID-19 pandemic.

5. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other members of law enforcement and from witnesses.

This Affidavit is intended to show merely that there is sufficient probable cause and does not set forth all of my knowledge about this matter.¹

PROBABLE CAUSE

The Paycheck Protection Program

6. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to the millions of Americans who are suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program (“PPP”).

7. In order to obtain a PPP loan, a qualifying business submitted a PPP loan application, which was signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application (Small Business Administration (“SBA”) Form 2483), the small business (through its authorized representative) was required to provide, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures were used to calculate the amount of money the small business was eligible to receive under the PPP. In addition, businesses applying for a PPP loan were required to provide documentation confirming their payroll expenses.

¹ The conduct and charges described in this Affidavit are part of a larger investigation that is being conducted in this District and elsewhere. As a result, not all numbered sources and anonymous individuals and entities are described in every filing. I have included in this Affidavit only those individuals and entities I have deemed necessary to explain the particular facts set forth here.

8. A PPP loan application was processed by a participating lender. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies. While it was the participating lender that issued the PPP loan, the loan was 100% guaranteed by the SBA. Data from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, was transmitted by the lender to the SBA in the course of processing the loan.

9. PPP loan proceeds were required to be used by the business on certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven if the business spent the loan proceeds on these expense items within a designated period of time and used a defined portion of the PPP loan proceeds on payroll expenses.

Financial Institutions

10. This Affidavit references financial institutions that are headquartered in the United States and insured by the Federal Deposit Insurance Corporation, including Bank 1, Bank 3, Bank 5, Bank 6, Bank 7, and Bank 11.

The Scheme to Obtain Fraudulent PPP Loans

11. On or about May 13, 2020, Phillip J. Augustin (“Augustin”) and CHS 2 worked together to submit a fraudulent PPP loan application on behalf of a company owned by Augustin. Augustin submitted a PPP loan of \$84,515 to a federally insured bank (hereinafter “Bank 3”), through a third-party company processor (hereinafter “Bank Processor 1”). The application

included bank statements that are clear forgeries, and CHS 2 has admitted that the application was based on documents that he falsified for Augustin.²

12. Following the success of that initial fraudulent PPP application, Augustin and CHS 2 began to work on obtaining more and larger PPP loans for Augustin's associates and others, generally for several hundred thousand dollars for each loan, up to as much as approximately \$1.24 million. Based on the evidence investigators have reviewed so far, CHS 2 and Augustin collectively coordinated applications for PPP loans that are together worth more than \$34 million dollars. The evidence also shows many more PPP loans were attempted but rejected by banks or their partners, or were planned and prepared, but not submitted before CHS 2's arrest. The evidence suggests that all or nearly all of those loan applications were fraudulent.

13. Investigators have obtained many other PPP loan applications that CHS 2 has admitted he submitted as part of this scheme, based on falsified documents, and have also obtained draft documents used or intended to be used in those applications or others. These applications all follow the same pattern of fraud—many with obviously counterfeit February 2020 bank statements, and all with fabricated IRS Forms 941 (titled, "Employer's Quarterly Federal Tax Return") with the same indicia of fraud found in Augustin's initial application—but generally with even larger inflated payroll numbers, thus yielding much larger loans.³ CHS 2 has explained to

² On June 25, 2020, investigators arrested CHS 2 and another person now cooperating with the investigation ("CHS 3") and executed search warrants at their residences. Following his arrest, CHS 2 chose to cooperate with the investigation in the hope of obtaining favorable consideration in connection with his pending charges. CHS 2 was interviewed on that day, and has continued to cooperate with the investigation after obtaining counsel. Most of his statements related herein have been corroborated by records obtained from third parties or recovered from his electronic devices.

³ Some loan applications also included voided checks that appear to be falsified, such as a purported Bank 5 check that appears to have been produced on a computer and, as an email subject line transmitting the check reads, "Converted to PDF," rather than a scan of an authentic check.

investigators that the figures in the Forms 941 were the product of a formula that allowed him to start with a target loan amount, and then “back into” the payroll figures on the form. He explained how he used figures that would produce an average monthly payroll for 2019 that, when multiplied by 2.5, would yield the requested loan amount. In turn, the number of employees reported was chosen based on fictional payroll figures, chosen to avoid an average employee salary that might raise suspicion.

14. CHS 2 has also explained that he tried to use bank statements showing that the company had a large balance. Because so few companies had such a statement, and likely also because it was easier than keeping track of their true statements, CHS 2 repeatedly submitted near-replicas of the same falsified bank statements. In particular, CHS 2 appears to have recycled one statement each from Bank 1, Bank 6, and Bank 7. In recycling a statement, CHS 2 generally changed only the account number and the account holder’s name and address, such that each version of the statement had identical figures and line items throughout the statement.

15. A review of records for bank accounts controlled by CHS 2 at Bank 5 confirm CHS 2’s admissions that he received numerous kickbacks, often of approximately 25% of the amount of the loans, and that he regularly wired Augustin a share of that kickback in the early stages of the scheme. CHS 2 explained that they were doing so many loans by the end of May that he changed course, instead wiring larger lump sums, collecting Augustin’s shares of the kickbacks for multiple loans in one wire.

16. Investigators are still receiving and analyzing records, but based on a preliminary analysis, as of August 31, 2020, investigators had identified a total of approximately \$2,367,765.82 in transfers to CHS 2’s accounts from entities that each obtained a sizable PPP loan and that were

identified in the PPP files seized from CHS 2's and another co-conspirator's residences, as described below—or from individuals associated with those entities.

17. The PPP loans identified above as implicated in the foregoing kickback payments to CHS 2 represent only a fraction of the overall scheme. In executing search warrants at the respective residences of CHS 2 and CHS 3, federal agents found stacks of paper printed out and organized by entity, containing an “intake form,” fabricated Forms 941, or both for each entity. The intake forms contained fields for the information needed to fabricate the documents and fill out other aspects of the PPP application: identifying information about the owner and company, as well as bank account information for receiving the loan. A section at the end marked “BELOW IS OFFICE USE ONLY” included blank fields for the “Number of Employees,” “Monthly Payroll Expense,” and “SBA Loan Pre-Approval Amount.” Between CHS 2's and CHS 3's residences, investigators seized paper files for PPP loan applications for approximately 80 different entities.

18. Data obtained from the SBA showed additional PPP loan applications from additional entities that text message and email records show had been referred to CHS 2 by members of the conspiracy.

Recorded Calls, Text Messages, Bank Records, and Toll Records Confirm ROSADO's Knowing Participation in the Fraudulent Loan for Devonte Thames

19. As part of the investigation, law enforcement obtained communications between CHS 2 and another individual who has separately been charged as part of this scheme, Devonte Thames. These communications included text messages and recorded calls. I have reviewed a number of these communications, which discussed, among other things, kickback payments paid

to ROSADO for a fraudulent PPP loan Thames received for his own company, Berneta E. Thames Foundation LLC (the “Thames Foundation”).⁴

20. At law enforcement’s direction, on or about January 22, 2021, CHS 2 conducted a recorded call to Thames at the phone number belonging to Thames. CHS 2 was returning a call he received from Thames on or about January 21, 2021, when Thames reached out to CHS 2, while CHS 2 was located within the Southern District of Florida, after several months of silence, to obtain new PPP loans through the fraud scheme. Thames explained to CHS 2 that “Ricca” was his contact in obtaining his original PPP loan for the Thames Foundation. Thames explained that in obtaining this loan, he had followed “Ricca’s” instructions regarding the kickback payment he owed to the scheme’s participants. Specifically, Thames explained that he had sent a wire payment of about \$60,000, followed by another wire of about \$20,000, before paying the remaining kickback balance to “Ricca” in cash.

21. Beginning on or about February 5, 2021, CHS 2 conducted multiple recorded calls with Thames at the same phone number. During one of these calls, Thames told CHS 2 that ROSADO’s nickname is “Ricca,” but that “Jericca” is her real name. Thames could not recall her last name. Thames also told CHS 2 that it had been about two months since he had last spoken to ROSADO. On or about February 5, 2021, Thames told CHS 2 that ROSADO’s phone number is 925-550-1385. Subscriber records for 925-550-1385 from AT&T listed “JERICCA ROSADO” as the subscriber for this phone number from May 18, 2019 to December 10, 2020.

⁴ Bank Processor 1’s Internet Protocol (“IP”) address records for the Thames Foundation loan application showed that a computer with an IP address (ending in 170) associated with CHS 2’s residence in Broward County, Florida, logged into the Thames Foundation loan account as early as May 27, 2020 and took certain steps as part of the loan application process.

22. On or about February 6, 2021, CHS 2 conducted a recorded call to Thames at the same phone number. Thames provided CHS 2 with details of wire transfers and payments Thames made after receiving the PPP loan for the Thames Foundation. Thames told CHS 2 that the instructions for these wire transfers and payments came via text message from ROSADO. Thames explained to CHS 2 that ROSADO sent instructions by text message for Thames to wire transfer approximately \$60,000. Thames said he thought he took a screenshot of the wire information for this transaction because he remembered walking into the bank and having everything written down. Bank records for the Thames Foundation held at Bank 6 showed that, on or about June 5, 2020, Thames wired \$61,460 to an account for a company that CHS 2 controlled held at Bank 5 in Hollywood, Florida. According to Thames, ROSADO also sent instructions by text message for Thames to wire \$20,486 to another individual who has been charged in this scheme (“CHS 5”)⁵ at Bank 8 in Davie, Florida. Bank records for an account held by Thames at Bank 7 showed that, on or about June 26, 2020, Thames wired \$20,486 to CHS 5 at Bank 8.

23. On the same call, Thames told CHS 2 that ROSADO also sent him instructions by text message to overnight a certified check in the amount of approximately \$49,000 to Company 50. Thames told CHS 2 that he never sent this certified check to Company 50 because ROSADO instead traveled to Charleston, South Carolina, to pick up the payment in cash. Thames told CHS 2 that ROSADO traveled to Charleston twice to pick up money. Thames told CHS 2 that when ROSADO received the kickback payment, she traveled to Las Vegas, Nevada. Thames also told CHS 2 that ROSADO would call him when she was in a store purchasing something, and that ROSADO was “just blowing the money basically.”

⁵ CHS 5 has previously been charged and arrested for his role in the scheme. Following his arrest, CHS 5 chose to cooperate with the investigation in the hope of obtaining favorable consideration in connection with his pending charges.

24. According to the New York State Division of Corporations business entity website, Company 50 was incorporated as a domestic limited liability company on or around June 2, 2020. The registered agent for Company 50 is listed as “LEGALINC CORPORATE SERVICES INC.” An account at Bank 7 held in the name of Company 50 is not registered to ROSADO, but to two other individuals (“Person 58” and “Person 59”). As set forth below, on or about June 25, 2020, a corporate account at Bank 7 controlled by ROSADO transferred \$25,000 to the account at Bank 7 held in the name of Company 50 as part of an apparent kickback in connection with a fraudulent PPP loan obtained as part of the scheme. Further, the registered agent for Company 50 was also the registered agent for the transferor company controlled by ROSADO.

25. On or about February 8, 2021, Thames sent CHS 2 a screenshot of an apparent text message conversation between ROSADO and Thames discussing the kickback payments for the Thames Foundation PPP loan while Thames was at a Bank 6 branch location. In this screenshot, ROSADO provided Thames with a specific amount to send to CHS 2, and also instructed Thames to make an additional cash withdrawal for “payment[.]” Moreover, ROSADO instructed Thames that in the event Bank 6 employees had questions about the cash withdrawal, that Thames should say “it’s for cash flow for your business.”

Text Messages Between Thames and ROSADO Further Confirm ROSADO’s Knowing Participation in the Fraud Scheme

26. Law enforcement obtained text messages between Thames and ROSADO from Thames’s phone pursuant to a federal search warrant. I have reviewed these text messages, which include the exchange that Thames sent to CHS 2 in a screenshot on or about February 8, 2021, of a conversation between Thames and ROSADO that occurred on or about June 4, 2020. Generally, the text messages further illustrate ROSADO’s involvement in helping Thames to obtain the

fraudulent Thames Foundation PPP loan. They also illustrate ROSADO's involvement in coordinating kickback payments and recruiting additional participants to the fraud scheme.

27. From on or about May 26, 2020 through in and around July 2020, Thames continuously exchanged text messages with ROSADO at 925-550-1385 about the fraud scheme. Topics of discussion included the Thames Foundation PPP loan (including screenshots of loan documents); the "fees" that ROSADO and others would receive after Thames received this fraudulent PPP loan; wiring instructions for kickback payments to various scheme participants including CHS 2 and CHS 5; issues that Thames had with the depository bank for the Thames Foundation PPP loan; ROSADO's suggestion that Thames create a second corporate bank account to "move" the fraudulent Thames Foundation PPP loan proceeds; concerns over the possibility that the names of PPP loan recipients would become public; and a dispute about how much of a kickback Thames owed ROSADO for the Thames Foundation PPP loan.

28. Thames and ROSADO also exchanged text messages about recruiting additional confederate loan applicants to the fraud scheme. For example, on or about June 15, 2020, ROSADO sent Thames a message that read, "It's money on the floor ready to get got" followed by a message that read, "It's a lot of plays we can run[.]" These messages were in the context of ongoing discussions between Thames and ROSADO from in or around May 2020 through in or around July 2020 about a fraudulent PPP loan for an individual known to Thames ("Person 32").

Additional Records Confirm ROSADO's Involvement with the Fraudulent Loan for Person 32, Also Referenced in Text Messages Between ROSADO and Thames

29. On or about May 29, 2020, CHS 5 sent CHS 2 a text message in which he referred Person 32, who owned another company ("Company 32"), to CHS 2 for a PPP loan. CHS 5 said he did not know Person 32 or Company 32, and that Company 32 was referred through CHS 5 by an unidentified female co-conspirator.

30. According to the South Carolina Secretary of State business entity website, Company 32 was incorporated in or around April of 2014, and listed Person 32 as the company's registered agent. According to toll records received from Verizon, the subscriber for the phone number provided to CHS 2 was Person 32, and the business name was listed as Company 32. Toll records showed that from on or about May 31, 2020, until on or about July 13, 2020, Person 32 had continuous communications with ROSADO at phone number 925-550-1385.

31. The PPP loan application form for Company 32 listed Person 32 as the owner of Company 32, claimed Company 32 had 22 employees, and stated that the average monthly payroll was \$181,709. Based on this figure, the amount of the PPP loan request was \$454,272. The loan application for Company 32 contained the same indicia of fraud as other loan applications in the scheme, including fake bank statements and Forms 941 that followed the same style and pattern as the many other Forms 941 that CHS 2 described and acknowledged that he helped create and submit in the course of the scheme. CHS 2 has confirmed that he helped submit the PPP loan application for Company 32 and confirmed that it was based on fraudulent documentation. On June 2, 2020, Company 32 received a PPP loan of \$454,272 from Bank 3.

32. Bank records for CHS 2's account at Bank 5 showed an incoming wire transfer from Company 32 on June 8, 2020 for \$113,568. That payment was exactly 25% of the Company 32 PPP loan amount, which was the percentage CHS 2 typically required during the scheme. That payment is in addition to the apparent kickback that Company 32 paid to ROSADO, as further discussed below.

Phone Records Show ROSADO's Involvement with Additional PPP Loan Recipients

33. On or about May 29, 2020, CHS 5 sent CHS 2 a text message in which he referred another individual charged in the fraud scheme, David Redfern, for a PPP loan for Redfern's company, Wilder Effects LLC ("Wilder Effects"). CHS 5 said he did not know Redfern or Wilder Effects, and that Wilder Effects was referred through CHS 5 by an unidentified female co-conspirator. CHS 2 has confirmed that he helped submit the PPP loan application for Redfern's company, and confirmed that it was based on fraudulent documentation.⁶ Toll records showed that from on or about June 1, 2020, until on or about June 25, 2020, Redfern had continuous communications with ROSADO at phone number 925-550-1385. On or about October 14, 2020, law enforcement executed a federal search warrant for Redfern's phone and learned that ROSADO's phone number (925-550-1385) was saved as "Cali" in the phone's contacts.

34. On or about May 29, 2020, CHS 5 sent CHS 2 a text message in which he referred the owner ("Person 40") of another company ("Company 40") to CHS 2 for a PPP loan. CHS 5 said he did not know Company 40 or Person 40, and that Company 40 was referred through CHS 5 by an unidentified female co-conspirator. CHS 2 has confirmed that he helped submit the PPP loan application for Company 40, and confirmed that it was based on fraudulent documentation.⁷ Toll records received from T-Mobile for the phone number provided to CHS 2 for Person 40

⁶ The loan application for Wilder Effects contained the same indicia of fraud as other loan applications in the scheme, including fake bank statements and Forms 941 that followed the same style and pattern as the many other Forms 941 that CHS 2 described and acknowledged that he helped create and submit in the course of the scheme.

⁷ The loan application for Company 40 contained the same indicia of fraud as other loan applications in the scheme, including fake bank statements and Forms 941 that followed the same style and pattern as the many other Forms 941 that CHS 2 described and acknowledged that he helped create and submit in the course of the scheme.

showed that from about June 2, 2020, until about June 9, 2020, Person 40 had continuous communications with ROSADO at phone number 925-550-1385.⁸

ROSADO's Banking Activity Confirms Her Knowing Participation in the Fraud

35. I have also reviewed the bank records for ROSADO and her purported business, which confirm ROSADO's receipt of kickback payments from PPP loan proceeds obtained through the fraud scheme described in this Affidavit. According to Bank 7 records, on or about June 9, 2020, ROSADO opened a business checking account at Bank 7 for JAI ROSADO CONSULTING LLC ("Jai Rosado Consulting") and was the sole signatory on the account. According to the California Secretary of State business entity website, Jai Rosado Consulting was incorporated as a domestic limited liability company on or about June 2, 2020. Like Company 50, the registered agent for Jai Rosado Consulting was listed as "LEGALINC CORPORATE SERVICES INC."

36. On or about June 16, 2020, a cashier's check of \$50,000 was deposited into the Jai Rosado Consulting account at Bank 7. The cashier's check was dated June 11, 2020 and listed the remitter as Company 32, for which Person 32 had obtained a fraudulent PPP loan. On or about June 25, 2020, \$25,000 was transferred from the Jai Rosado Consulting account to an account in the name of Company 50. Between on or about June 23, 2020, and on or about June 30, 2020, ROSADO made at least eight withdrawals from the Jai Rosado Consulting account totaling \$12,700.

37. ROSADO also held at least one personal account at Bank 7 during the course of the scheme in the name of "JERICCA T ROSADO" and was the sole signatory on the account.

⁸ Bank Processor 1 rejected the PPP loan application that CHS 2 submitted on behalf of Company 40.

On June 2, 2020, a purchase was made from this account in the amount of \$125 to “INCFILE.COM LLC.” According to Incfile.com’s website, this business offers its customers a variety of LLC formation services. The records also showed transfers of funds between ROSADO’s personal account and the Jai Rosado Consulting account at Bank 7.

38. Bank records from the Jai Rosado Consulting Bank 7 account showed what appeared to be purchases of luxury items and personal expenses. For example, on or about July 9, 2020, ROSADO made a purchase in the amount of \$1,630.20 at Neiman Marcus, a luxury clothing store, in Charlotte, North Carolina. On or about July 15, 2020, ROSADO made a purchase for \$1,132.52 at Christian Louboutin, a luxury shoe store, in Las Vegas, Nevada. Beginning in or around August of 2020, ROSADO made recurring monthly payments to Novel Stonewall Station Apartments for what appear to be rent payments. In addition, bank records showed that ROSADO made several purchases for travel expenses during this same time period.

39. These purchases are consistent with social media posts to the publicly accessible Instagram account for the handle “preyforjai,” which contained images appearing to depict ROSADO in some of these cities at or around the time where these purchases were made. This Instagram account also contained numerous other images and videos of a person who matches ROSADO’s appearance.

CONCLUSION

40. Based on the forgoing, I respectfully submit that there is probable cause to believe that JERICCA ROSADO committed the Target Offenses, from on or about May 26, 2020, to at least on or about December 10, 2020, in the Southern District of Florida, and elsewhere.

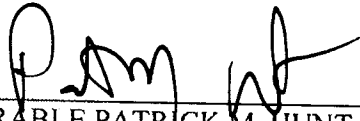
FURTHER YOUR AFFIANT SAYETH NAUGHT.



David Passonno
Special Agent
IRS-CI

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by ~~FaceTime~~ on this 15th day of March, 2021

telephone



HONORABLE PATRICK M. HUNT
UNITED STATES MAGISTRATE JUDGE