

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION**

UNITED STATES OF AMERICA,	)	
PLAINTIFF	)	
	)	
v.	)	Civil No. <u>5:22-CV-05026</u>
	)	
\$3,958,060.84 UNITED STATES CURRENCY	)	
AND THE APPROXIMATE AMOUNT	)	
THEREOF,	)	
DEFENDANT	)	

**COMPLAINT FOR FORFEITURE IN REM**

Plaintiff, United States of America, by its attorneys, David Clay Fowlkes, United States Attorney for the Western District of Arkansas, and the undersigned Assistant United States Attorney, brings this Complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**NATURE OF THE ACTION**

1. This is an action to forfeit property to the United States for violations of Title 18, United States Code, Section 1343, and as such is forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C).

**THE DEFENDANT IN REM**

2. The Defendant Property is \$3,958,060.84 in United States currency and the approximate amount thereof, seized from U.S. Bank National Association account in the name of Walmart Inc. and ending in 5431, on November 30, 2021, which is presently in the custody of the United States Secret Service.

**JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction over an action commenced by the United States under Title 28, United States Code, Section 1345, and over an action for forfeiture under Title 28, United States Code, Sections, 1355(a), 1355(b)(1)(A) & (B) and 1395(a). This Court also has jurisdiction over this particular action under Title 18, United States Code, Section 981.

4. This Court has *in rem* jurisdiction over the Defendant Property:

a) pursuant to Title 28, United States Code, Section 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district; and

b) pursuant to Title 28, United States Code, Section 1355(b)(1)(B), incorporating Title 28, United States Code, Section 1395, because the action occurred in this district.

5. Venue is proper in this district:

a) pursuant to Title 28, United States Code, Section 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district; and

b) pursuant to Title 28, United States Code, Section 1395, because the action accrued in this district.

**BASIS FOR FORFEITURE**

6. The Defendant Property is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), because it constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1343 (wire fraud).

7. “A civil forfeiture action is an *in rem* proceeding brought by the government as plaintiff against defendant property asserting that ‘[a]ll right, title, and interest in [the defendant] property’ has vested in ‘the United States upon commission of the act giving rise to forfeiture.’” *United States v. Dodge Caravan Grand SE/Sport Van, VIN # 1B4GP44G2YB7884560*, 387 F.3d 758, 760 (8th Cir.2004) (quoting Title 18, United States Code, Section 981(f)). Civil Forfeiture is governed by the Civil Asset Forfeiture Reform Act of 2000 (“CAFRA”), Pub.L. No. 106–185, 114 Stat. 202, codified in part at Title 18, United States Code, Sections 981 and 983. CAFRA “applies to forfeiture actions initiated after August 23, 2000.” *United States v. Triplett*, 240 Fed.Appx. 736, 736 (8th Cir. 2007). “Under CAFRA, the burden of proof is on the [g]overnment to establish, by a preponderance of the evidence, that the property is subject to forfeiture.” *United States v. Real Prop. Located at 3234 Wash. Ave. N., Minneapolis, Minn.*, 480 F.3d 841, 843 (8th Cir. 2007) (citing Title 18, United States Code, Section 983(c)(1)) (internal quotation marks omitted). “[I]f the [g]overnment’s theory of forfeiture is that the property was used to commit or facilitate the commission of a criminal offense, or was involved in the commission of a criminal offense, the [g]overnment shall establish that there was a substantial connection between the property and the offense.” Title 18, United States Code, Section 983(c)(3).

### **FACTS**

8. Please see the Affidavit of United States Secret Service, Special Agent, Albert Wood, attached hereto as Exhibit “A.” The attached Affidavit is incorporated herein as if word-for-word and made a part of this Complaint. As such, the Affidavit is reincorporated here as if alleged herein and requires a responsive pleading to each separate averment contained therein.

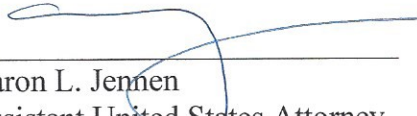
**CLAIM FOR RELIEF**

WHEREFORE the United States prays that the Defendant Property be forfeited to the United States, that the Plaintiff be awarded its costs and disbursements in this action, and for such other and further relief as the Court deems proper and just.

Respectfully submitted,

DAVID CLAY FOWLKES  
UNITED STATES ATTORNEY

By:

  
\_\_\_\_\_  
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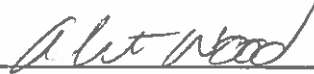
**VERIFICATION**

I, Albert Wood, hereby verify and declare under penalty of perjury that I am a Special Agent with the United States Secret Service, and that I have read the foregoing Verified Complaint In Rem and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent with the United States Secret Service.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated this 10<sup>th</sup> day of February 2022.

  
\_\_\_\_\_  
Albert Wood  
Special Agent  
United States Secret Service

**EXHIBIT A**

**AFFIDAVIT IN SUPPORT OF COMPLAINT FOR FORFEITURE IN REM**

I, Albert Wood (hereinafter, “your Affiant”), Special Agent, United States Secret Service, being duly sworn in the manner provided by law, hereby depose and state as follows:

**AFFIANT EXPERIENCE AND KNOWLEDGE**

1. I am currently a Special Agent with the United States Secret Service, and have been so employed in this capacity since July 2000. I have received training in general law enforcement and criminal investigations from the Federal Law Enforcement Training Center in Glynco, Georgia, as well as from the United States Secret Service Training Academy in Beltsville, Maryland. I am presently assigned to the Little Rock, Arkansas, Field Office. My responsibilities include investigating financial crimes such as violations of Title 18, United States Code, Section 1343. I have been involved in the drafting and execution of search and seizure warrants relating to criminal investigations.

2. This Affidavit does not include all of the information known to your Affiant and law enforcement officers who are part of this investigation. The information presented herein is based on my training, experience, and participation in criminal investigations, including investigations in violation of Title 18, United States Code, 1343, my personal knowledge and observations during the course of this investigation, and information provided to me by other sources noted herein. Additionally, the information presented herein is derived from information provided by federal and local law enforcement agencies, the review and analysis of financial records, public sources and databases, and from other sources, including employees, investigators, and representatives of Walmart, Inc. (hereinafter, “Walmart” or “Walmart, Inc.”).

3. This Affidavit is made for the limited purpose of establishing the forfeitability of the property described below. Because this Affidavit is for the limited purpose of establishing probable cause to forfeit the Defendant Property, it contains only a summary of the relevant facts. I have not included every fact known to me or others concerning this investigation.

#### **APPLICABLE CRIMINAL LAW**

4. Title 18, United States Code, Section 1343 provides:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.

#### **PROPERTY TO BE FORFEITED**

5. This Affidavit is being submitted in support of the forfeiture of the United States currency totaling \$3,958,060.84 and the approximate amount thereof, seized from U.S. Bank National Association account in the name of Walmart Inc. and ending in 5431, on November 30, 2021, which is presently in the custody of the United States Secret Service.

6. “Gift cards” are a form of prepaid debit cards with a monetary value applied to the gift card for future use.

7. A “load” of a gift card refers to the act of adding funds with a monetary value and applying it to the gift card for future use.

#### **THE INVESTIGATION**

8. Walmart Inc. is headquartered in Bentonville, Arkansas, which is within the Western District of Arkansas, Fayetteville Division. All of Walmart’s monitoring and management of Walmart gift cards are conducted from Walmart’s headquarters, requiring that all

Walmart gift card transactions pass through the Western District of Arkansas, Fayetteville Division. Walmart's Treasury Department, Payment and Risk Team, Global Investigations Team, and computing resources are located in the Western District of Arkansas, Fayetteville Division, and the functions of these Walmart components are conducted in the Western District of Arkansas, Fayetteville Division. Additionally, the system that was created by Walmart investigators to detect the fraudulent financial transactions described below was created, developed and utilized in the Western District of Arkansas, Fayetteville Division.

9. In December 2018, your Affiant received information from Walmart executives who contacted the United States Secret Service, Little Rock, Arkansas, Field Office, in reference to what they believed to be Elder Fraud that was facilitated via Walmart gift cards. Specifically, in the fall of 2015, Walmart's Global Investigations team noticed a pattern of regular inquiries from local police departments regarding reports filed by victims of unspecified scams who, as part of the scam, had been directed to purchase Walmart gift cards with values typically in the sum of \$500.00 and \$1,000.00.

10. In response, Walmart identified video surveillance corresponding to Walmart gift card loads in Walmart stores, which typically occurred at Walmart cash registers, and determined that a disproportionate number of the victims at the cash registers who loaded the Walmart gift cards were senior citizens. The video surveillance typically revealed that the victims were actively using their cellular phones to convey the Walmart gift card numbers to the unknown individual who they were telephonically communicating with, and that the duration of the telephone call lasted long enough to enable the victim to complete the load of the Walmart gift card. Further research confirmed that the timing of these telephone calls as it related to the first known monetary



balance check of the Walmart gift card occurred either during the time when the victim was on the telephone call with the unknown individual or shortly thereafter.

11. After reviewing video surveillance corresponding to the Walmart gift card loads that occurred inside Walmart stores, Walmart reviewed their gift card system and detected patterns where a large number of Walmart gift cards valued at \$500.00 and \$1,000.00 were purchased in stores across the United States and had an immediate check of the Walmart gift card's value from overseas. Walmart determined that these gift cards were used to make purchases in a state different from the state where the Walmart gift card was loaded, with the purchases occurring within minutes or hours of the original Walmart gift card load.

12. Walmart explained to your Affiant the patterns they detected included, for example, an individual who would purchase four Walmart gift cards, via cash or credit card, with each Walmart gift card having a value of \$500.00, in a particular city, on a particular day and time. Walmart determined that within minutes of the purchase of the four Walmart gift cards, a balance check was conducted from overseas for each of the four Walmart gift cards. Walmart explained that within minutes of these balance checks, the four Walmart gift cards were used to make purchases in locations other than the location of the purchase of the four Walmart gift cards.

13. In February 2016, in an effort to combat these unusual transactions and protect consumers, Walmart began to track these overseas balance checks and developed a system to identify and recognize what they believed were fraudulent patterns related to Walmart gift cards. Looking at this pattern of conduct, Walmart compiled a list and identified approximately 10,639 suspicious transactions with a value of \$4,403,749.73, which occurred in all fifty states, as well as Washington D.C. and Puerto Rico, and included both cash and credit card purchases of Walmart gift cards.

14. In examining these suspected fraudulent transactions, Walmart identified whether a particular Walmart gift card was purchased via cash or credit card. When cash was used to make the purchase, Walmart captured the full Walmart gift card number, the date and time of the purchase of the Walmart gift card, store location, and other data. When a credit card was used, Walmart captured the aforementioned data, in addition to the full credit card number used.

15. In July 2017, Walmart froze the Walmart gift cards funds that were determined to be connected to this suspected fraud and which included transactions which dated back to approximately April 05, 2016, and placed the frozen funds in the U.S. Bank National Association account in the name of Walmart Inc. and ending in 5431. With regard to these frozen funds, Walmart has not received inquiries from any individuals as to why the funds on their Walmart gift cards were rendered unavailable. Walmart, who advised the United States Secret Service that they had frozen over \$4,000,000.00 in Walmart gift card funds associated with suspected fraudulent transactions, requested federal assistance to identify the victims from the list of fraudulent transactions that they had compiled and return these frozen funds to the victims of this fraud.

16. From the list that Walmart compiled of suspected fraudulent transactions, the United States Secret Service identified 2,002 unique credit card numbers and commenced an investigation into the identification of the issuing banks linked to the credit cards connected to this fraud as well as the identification of the victim-cardholders. Specifically, the United States Secret Service examined credit card numbers to identify the issuing financial institutions. Once identified, the United States Secret Service contacted those issuing financial institutions' fraud detection departments. The United States Secret Service advised of the fraudulent transactions, and instructed the issuing financial institutions to establish contact with the victim-cardholder in an effort to request the victim-cardholder contact the United States Secret Service.

17. For example, on July 11, 2019, United States Secret Service Special Agent In Charge (hereinafter, "SAIC") Allen Bryant, contacted Centier Bank, located in Merrillville, Indiana, concerning two Walmart gift card transactions that had taken place in North Little Rock, Arkansas. Specifically, SAIC Bryant explained to the Visa Fraud Department of Centier Bank, that on September 20, 2018, at approximately 12:12 p.m. two Walmart gift cards, each with a value of \$500.00, were purchased at a Walmart store at 4450 E. McCain Boulevard, North Little Rock, Arkansas, using Visa card ending in 8413. After additional correspondence, Centier Bank identified the victim-cardholder as an individual whose name bears the initials R.J., approximately age 64, from Belleville, Michigan, who later contacted the Little Rock, Arkansas, Field Office on July 15, 2019. R.J. confirmed that they had purchased the two aforementioned Walmart gift cards, each with a value of \$500.00, in North Little Rock, Arkansas, in the fall of 2018, and further stated that they believed that they had been the victim of fraud.

18. Specifically, R.J. stated that on September 20, 2018, a man with what R.J. described as having a Middle Eastern accent, called R.J.'s cellular phone and claimed to be a bill collector from an apartment complex in Michigan where R.J. previously resided. The caller informed R.J. that R.J. owed \$4,000.00, but that R.J. could settle this outstanding balance if R.J. purchased two Walmart gift cards, each with a value of \$500.00, at any location that would allow a transaction of \$500.00, and provide the gift card information to the caller. Since R.J. was employed as a truck driver and was passing through North Little Rock, Arkansas, at the time of this telephone call, R.J. believed the caller's story, did as instructed, and purchased two Walmart gift cards, each with a value of \$500.00, in North Little Rock. Once R.J. obtained the two Walmart gift cards, each with a value of \$500.00, R.J. telephonically contacted the caller and provided the caller with the Walmart gift card numbers.

19. At the time of the interview with the United States Secret Service on July 11, 2019, R.J. was unable to recall the exact telephone number they contacted to relay the information pertaining to the Walmart gift cards, but stated it was an 800-number of some kind. R.J. stated that they did not realize he had been the victim of fraud until the caller telephonically contacted him approximately one week later and made the same demands. R.J. refused the second time, and did not hear from the caller again. R.J. was identified by the United States Secret Service as a victim in the instant fraudulent scheme and whose money was frozen by Walmart and is included in the \$3,958,060.84 and the approximate amount thereof, seized from U.S. Bank National Association account in the name of Walmart Inc. and ending in 5431.

20. On August 23, 2019, an individual whose name bears the initials K.K., approximately age 70, contacted SAIC Bryant to report that they were a victim of fraud. Specifically, K.K. reported that beginning in November 2017, K.K. received telephone calls from an individual who claimed that K.K. had been, or would be, the victim of “hacking” and that it was necessary for K.K. to sign up for an unspecified service to keep K.K. safe. The caller instructed K.K. to purchase Walmart gift cards as payment for the service. K.K. reported that they had purchased \$8,000.00 in Walmart gift card purchases and claimed to have been victimized in excess of \$137,000.00 over the past twenty-one months as a result of various scams.

21. On September 3, 2019, K.K. reported to the United States Secret Service, Tulsa, Oklahoma, Resident Office, and met with Special Agent Roy Ward for an interview. During this interview, K.K. furnished over one hundred physical Walmart gift cards and receipts. K.K. stated that on November 10, 2017, K.K. received a telephone call on their cellular phone from a man identifying himself as “Krish Moore.” K.K. stated that they could call Krish Moore whenever they wanted and provided Krish Moore’s telephone number. K.K. stated that Krish Moore had what

K.K. described to be an East Indian accent, and that Krish Moore told K.K. that he (Krish Moore) was located in Sri Lanka. Krish Moore offered K.K. “total virtual safety” for K.K.’s telephone, computer, bank accounts, email and social security. After approximately three or four days of calling K.K., Krish Moore convinced K.K. that his offer was sincere and deposited \$1,000.00 into the bank account that K.K. provided.

22. Krish Moore told K.K., “Give me \$15,000.00 in thirty days” in exchange for “total virtual safety.” K.K. stated that Krish Moore gained access to their personal computer through a software application called “Teamwork.” K.K. then purchased Walmart gift cards and typed the Walmart gift card account numbers onto a notepad application on K.K.’s personal computer, from which Krish Moore would copy and access the Walmart gift card funds. Once K.K. had provided at least \$15,000.00 to Krish Moore, K.K. was contacted by another man who K.K. described as having an East Indian accent who attempted to offer K.K. the same virtual protection as Krish Moore. This second man told him that Krish Moore was a “bad guy.” K.K. did not provide any funds to this second man.

23. When K.K. contacted Krish Moore regarding this second man, Krish Moore became very upset and told K.K. to ignore the second man. K.K. questioned Krish Moore about the details of their arrangement and why K.K. was still sending Krish Moore money. Krish Moore told K.K. that he (Krish Moore) was an undercover agent with the Federal Bureau of Investigation (hereinafter, “FBI”) and that he (Krish Moore) was trying to “bust bad guys.” Krish Moore told K.K. that Krish Moore would give K.K. his money back on August 28, 2019, and that K.K. would even receive a bonus. K.K. reported that Krish Moore accessed K.K.’s personal computer on an unknown day when K.K. was at K.K.’s personal computer, and that Krish Moore navigated K.K. to a website that appeared to resemble an official FBI webpage. K.K. stated that this website was

“Geektyper,” and featured a photograph of a man named “Nikolai Ondrejko.” K.K. stated that Krish Moore reported that Krish Moore had “locked up” Nikolai Ondrejko and that Nikolai Ondrejko was the man responsible for accessing K.K.’s personal information. Krish Moore added that there was one more suspect that Krish Moore needed to investigate and that he might need a few more days beyond August 28, 2019, for Krish Moore to return K.K.’s money. K.K. estimated that he sent a total of \$137,000.00 to Krish Moore. Walmart records confirmed that K.K. had purchased \$4,000.00 in Walmart gift cards, with each card having a value of \$500.00, on October 2, 2018, at approximately 12:44 p.m. at a Walmart located at 1300 E. Albany Street, Broken Arrow, Oklahoma. Additional Walmart records confirmed that K.K. had purchased another \$4,000.00 in Walmart gift cards, with each card having a value of \$500.00, at the same Broken Arrow, Oklahoma, Walmart on October 23, 2018, at 11:09 a.m. K.K. was identified by the United States Secret Service as a victim in the instant fraudulent scheme and whose money was frozen by Walmart and is included in the \$3,958,060.84 and the approximate amount thereof, seized from U.S. Bank National Association account in the name of Walmart Inc. and ending in 5431.

24. On June 24, 2019, the United States Secret Service contacted Regions Bank in Birmingham, Alabama, to identify the victim-cardholder associated with a credit card used to purchase three Walmart gift cards, each valued at \$500.00 at a Walmart in Mobile, Alabama, on July 26, 2018. Regions Bank contacted the victim-cardholder and advised that the victim-cardholder was an individual whose name bears the initials L.D.

25. On September 9, 2019, your Affiant telephonically contacted the individual whose name bears the initials L.D., approximately age 71, and explained to L.D. that your Affiant contacted L.D. regarding the events that led to L.D.’s purchase of Walmart gift cards. L.D., who appeared to be suffering from mental decline, was unable to recall any details pertaining to

Walmart gift cards, and requested that your Affiant contact L.D.'s daughter, who is an individual whose name bears the initials R.S.

26. Continuing on September 9, 2019, your Affiant received a telephone call from R.S. wherein R.S. advised that although her parent, L.D., has not been officially diagnosed, R.S. believes that L.D. suffers from early dementia. R.S. advised that R.S. is aware that L.D. had been the victim of a scam which was perpetrated by unknown individuals who coerced L.D. to purchase Walmart gift cards. R.S. stated that L.D. was told by these unknown individuals that L.D. owed money to the Internal Revenue Service (hereinafter, "IRS") and that L.D. needed to purchase Walmart gift cards to pay L.D.'s back taxes. R.S. was unaware of the total amount of money L.D. lost as a result of this fraud or the number of times that L.D. purchased Walmart gift cards. R.S. advised, however, that on an unknown date, L.D.'s local Walmart notified R.S. that L.D. had purchased many Walmart gift cards. Walmart records confirmed that L.D. purchased \$1,500.00 in Walmart gift cards, with each card having a value of \$500.00, on July 26, 2018, at approximately 4:17 p.m. at a Walmart located at 6575 Airport Boulevard, Mobile, Alabama. L.D. was identified by the United States Secret Service as a victim in the instant fraudulent scheme and whose money was frozen by Walmart and is included in the \$3,958,060.84 and the approximate amount thereof, seized from U.S. Bank National Association account in the name of Walmart Inc. and ending in 5431.

27. On September 9, 2019, an individual whose name bears the initials K.A., approximately age 64, contacted SAIC Bryant and reported that K.A. was the victim of fraud. Specifically, K.A. who maintains Discover Card ending in 7532, stated that in September 2018, they were contacted by an individual claiming to be an IRS representative who told K.A. that K.A. owed \$3,000.00 in back taxes. K.A. was further informed that they would be arrested if K.A. did

not go to Walmart immediately and purchase three Walmart gift cards, each with a \$1,000.00 value, and provide the corresponding Walmart gift card numbers to the caller. On September 4, 2018, K.A. went to Walmart located at 3919 N. Mall Ave, Fayetteville, Arkansas, and purchased three Walmart gift cards, each with a \$1,000.00 value. K.A. telephonically contacted the individual they believed to be an IRS representative, and provided him with the Walmart gift card numbers. K.A. never heard from the individual again. K.A. was identified by the United States Secret Service as a victim in the instant fraudulent scheme and whose money was frozen by Walmart and is included in the \$3,958,060.84 and the approximate amount thereof, seized from U.S. Bank National Association account in the name of Walmart Inc. and ending in 5431.

28. On November 8, 2019, an individual whose name bears the initials P.T. telephonically contacted your Affiant. Specifically, P.T. reported that their father, an individual whose name bears the initials M.G., approximately age 92, answered a pop-up on M.G.'s personal computer in July 2018, which claimed that M.G.'s personal computer was infected with a virus and that M.G. needed to download an application to fix the problem. P.T. reported that M.G. complied with the pop-up's request and it allowed a third-party to take control over M.G.'s personal computer. M.G. did not recall providing their telephone number to anyone, but advised that an unknown individual, who M.G. described as having an Indian accent, contacted M.G. and convinced M.G. to purchase Walmart gift cards to prevent M.G.'s personal computer from being locked. The unknown individual informed M.G. that he had access to M.G.'s financial accounts and that he would steal all of M.G.'s money if M.G. did not pay the unknown individual \$5,000.00 in Walmart gift cards. M.G. purchased the Walmart gift cards and telephonically provided the unknown individual with the Walmart gift cards numbers. The unknown individual convinced M.G. to purchase another \$10,000.00 worth of Walmart gift cards, for a total \$15,000.00 over the



course of four days. The unknown individual further instructed M.G. to shred all of the Walmart gift card receipts.

29. M.G. notified P.T., who has signatory authority over M.G.'s financial accounts, and P.T. spoke to the unknown individual. Specifically, P.T. informed the unknown individual that P.T. knew M.G. was the victim of the unknown individual's scam but the unknown individual continued to telephonically contact M.G. for approximately one month. P.T. had M.G.'s personal computer wiped. Walmart records confirmed that on July 26, 2018, M.G. purchased five separate Walmart gift cards, each with a \$1,000.00 value, at approximately 2:16 p.m. at Walmart on 3911 Bienville Boulevard, Ocean Springs, Mississippi. M.G. was identified by the United States Secret Service as a victim in the instant fraudulent scheme and whose money was frozen by Walmart and is included in the \$3,958,060.84 and the approximate amount thereof, seized from U.S. Bank National Association account in the name of Walmart Inc. and ending in 5431.

30. It was determined that from approximately April 05, 2016, through and including November 6, 2018, your Affiant identified approximately 2,002 victim accounts, and approximately 5,581 fraudulent credit card transactions, with an approximate loss of \$2,507,187.79. Additionally, your Affiant identified approximately 5,058 fraudulent cash and unrecoverable credit card transactions which were involved in the scam related to Walmart gift cards, with an approximate loss of \$1,896,561.94. Your Affiant determined the approximate total loss amount over the previously-identified time period is \$4,403,749.73, with the total recovered amount seized to be \$3,958,060.84 and the approximate amount thereof.

**CONCLUSION**

31. Your Affiant submits that this Affidavit establishes probable cause to believe that the Defendant Property represents the proceeds obtained as a result of violations of Title 18, United States Code, Section 1343, and, as such, are subject to forfeiture under Title 18, United States Code, Section 981(a)(1)(C).

Albert Wood  
Albert Wood  
Special Agent, United States Secret Service

Subscribed and sworn before me this 10 day of February 2022.

State of Arkansas )  
County of Pulaski )

Before me, the above authority personally appeared, Special Agent Albert Wood, who having produced his United States Secret Service Credentials as identification and having being duly sworn, states that the foregoing is true to the best of his knowledge, information and belief.

Witness my hand and official seal on this 10 day of February 2022.

Sept 23, 2027

Notary Public  
Commission Expires:

[Signature]

