

AFFIDAVIT

STATE OF WASHINGTON)
COUNTY OF KING) ss:

SILVIA REYES, being first duly sworn on oath, deposes and says:

I. IDENTITY OF AFFIANT AND INTRODUCTION

1. I am a Special Agent (SA) with the Internal Revenue Service, Criminal Investigation Division (IRS-CI) and have been such since February, 2005. I am currently assigned to the Seattle, Washington field office. As a Special Agent, I have received specialized training in taxation, accounting, financial structuring and money laundering investigative techniques. Before becoming an SA with IRS-CI, I was employed for six years as a Special Agent for the Washington State Gambling Commission Financial Investigations Unit. In that position, I was responsible for conducting forensic audits of business and individuals' books and records, and also for conducting criminal and administrative investigations to detect violations of the Revised Code of Washington and the Washington Administrative Code.

2. I hold a Bachelor of Arts degree in Accounting, and a Master of Business Administration degree in Finance. In 2001 I obtained, and hold in good standing to date, a certificate of Certified Public Accounting from the Washington State Board of Accountancy and a certificate of Certified Fraud Examiner from the American Association of Certified Fraud Examiners.

3. I learned the facts set forth in this affidavit by reviewing documents referenced herein, and from information obtained from other law enforcement officers, including, in particular, Federal Bureau of Investigation Special Agent Kenneth A. Schmutz, and United States Postal Inspector Joseph Stephenson.

4. Because this affidavit is submitted for the limited purpose of obtaining

1 seizure warrants for the financial accounts and assets referenced herein, I have not
2 included all details of every aspect of the investigation, but set forth only those facts I
3 believe are necessary to establish cause for the issuance of the seizure warrants.
4 Details of the facts summarized herein are set forth in the Application and Affidavit for
5 Search Warrant of the residence and computers of Robert Alan Soloway, which is
6 attached hereto and incorporated as if fully set forth herein. In addition, when I rely on
7 statements made by others, such statements are set forth in substance and as pertinent
8 facts.

9 II. SUMMARY OF THE CASE

10 5. The attached Application and Affidavit for Search Warrant establishes that
11 from at least November 2003 Robert Alan Soloway ("Soloway") has committed
12 offenses against the United States.

13 Since at least November of 2003, Soloway has solely owned and operated a
14 business, "Newport Internet Marketing," ("NIM"), that Soloway and NIM
15 characterize as a "broadcast email" business. Soloway and NIM advertise and sell what
16 they describe as "broadcast email services" and a "broadcast email product."
17 Soloway and NIM advertise the company and the services and products that they sell by
18 sending bulk commercial e-mail messages (spam) over the Internet, and by publishing
19 websites on the world wide web. In those spammed and website advertisements,
20 Soloway and NIM make false and fraudulent representations about the products and
21 services they sell, the "technical support" they purportedly provide, and the guarantees
22 that they purportedly offer for their products.

23 The spam messages that Soloway and NIM transmit over the Internet to
24 advertise their company contain false and forged header information, and are relayed
25 through the use of a network of proxy computers. Some of the forged headers contain
26 e-mail addresses or domain names that belong to other real people and organizations,
27 which makes it appear as though those other people or organizations are responsible for
28 the spammed messages.

1 By conducting their operations in this way, Soloway and NIM have committed
 2 violations of federal laws, including Title 18 U.S.C. Sections 1037(a)(2) and (a)(3)
 3 (Fraud in Connection with Electronic Mail), Title 18 U.S.C. Section 1341 (Mail
 4 Fraud), Title 18 U.S.C. Section 1343 (Wire Fraud), Title 18 U.S.C. Section 1028A
 5 (Aggravated ID Theft), and Title 18 U.S.C. Section 1956(a)(1)(A)(i) (Money
 6 Laundering).

7 III. PURPOSE OF THE AFFIDAVIT

8 6. This affidavit is made in support of seizure warrants for the following
 9 accounts and assets:

10 <u>Account Owner</u>	<u>Financial Institution</u>	<u>Account Number</u>
11 Newport Internet Marketing	WestAmerica	05703285
12 Robert A Soloway	Wells Fargo	1506243243
13 Robert A Soloway	Epassport.com	2153939
14 Robert A Soloway	Epassport.com	2556723

15 These accounts are subject to seizure and forfeiture to the United States pursuant
 16 to Title 18, United States Code, 981(a)(1)(C), as proceeds of wire fraud and mail
 17 fraud, offenses that constitute "specified unlawful activities," as that term is defined in
 18 Title 18, United States Code, Section 1956(c)(7).

19 7. These seizure warrants are sought on the grounds that there is probable
 20 cause to believe that the listed accounts and assets constitute or are derived from the
 21 proceeds of violations of Title 18 U.S.C. Section 1341 (Mail Fraud) and Title 18
 22 U.S.C. Section 1343 (Wire Fraud).

23 8. In addition there is probable cause to believe that Robert A Soloway has
 24 laundered the proceeds of these transactions in violation of Title 18, United
 25 States Code, Section 1956, and that they are therefore subject to civil forfeiture in
 26 accordance with Title 18, United States Code, Section 981 (a)(1)(A) as property
 27 involved in money laundering.
 28

IV. SOLOWAY DOING BUSINESS AS NIM

1
2 9. I have reviewed the financial transactions conducted by Soloway and
3 Newport Internet Marketing Corporation, also variously known as NIM, Newport IM,
4 and NPR (hereinafter "NIM"). NIM was incorporated in California on
5 November 24, 1998. The trade name "NIM Corporation" was registered with the
6 Washington State Department of Licensing in December 2003.

7 10. NIM's California corporate registration has been suspended. NIM has
8 lost all corporate rights and powers for failure to meet statutory filing requirements in
9 either the California Secretary of State's Office or the California Franchise Tax Board.

10 11. Washington State law requires a foreign organization, being those formed
11 in a state other than Washington, to submit an application for Certificate of Authority to
12 do Business in Washington. The Washington State Secretary of State's Office has no
13 record of receiving the statutorily required application or issuing a Certificate of
14 Authority to do Business in Washington to NIM.

15 12. During my review of the financial transactions conducted by Soloway and
16 NIM, I examined the control of the corporation, the adherence to corporate formalities,
17 the use of the corporation's assets, and the ability to obligate the corporation. I found
18 that Soloway was the sole shareholder of NIM, and he alone held ownership, financial
19 interest, and control of the corporate assets. In addition, I found that Soloway routinely
20 commingled personal and corporate assets and liabilities.

21 13. Although the legal entity is no longer in good standing, and never
22 obtained authorization to operate within Washington State, Soloway has continued to
23 represent NIM as a separate and distinct legal entity. Based on my knowledge,
24 training, and experience I believe that the appearance of a corporation was maintained
25 in an attempt to shield Soloway from any liability resulting from the fraudulent activity
26 in which Soloway is engaged. The information summarized herein will establish
27 probable cause to seize the property of Robert Alan Soloway and Newport Internet
28 Marketing as set forth below.

V. FINANCIAL INVESTIGATION

1
2 14. I have reviewed business formation documents, documentation related to
3 the purchase and sale of personal assets, and personal and business invoices, bank
4 records, loan applications, credit reports, and credit card records as fully detailed in the
5 body of this Affidavit and the attached Affidavit in Support of Search Warrant. Based
6 upon the information I reviewed, the proceeds generated from the spam and related
7 mail and wire fraud is the primary source of income for NIM.

8 15. In addition, based on the deposits into accounts controlled by Soloway,
9 and the source of payments on debts owed by Soloway, I determined that NIM is his
10 primary source of income. I found no additional paychecks or other indications of
11 earnings, no records on file with Washington State Employment Security, or any other
12 documentation normally found for wage earners.

13 16. The information given by Soloway in a deposition taken on October 26,
14 2005, supports my review and evaluation. In the October 26, 2005 deposition the
15 following questions were asked of, and answered by Soloway:

16
17 Q: Can you give me your approximate dates of employment with NIM?

18 A: It's the only employment I've had in my life. So you can say
19 that I've never worked for anybody. It's only been my company.

20 Q: And you began in approximately 1996?

21 A: Correct. When I was about 16 or so. So that's the only
22 occupation I've had.

23 Q: You stated that you were the sole employee of NIM?

24 A: Correct. There are no employees besides myself.

25
26 Q: Are there any other officers or directors?

27 A: No.
28

1 17. The information given by Soloway also supports my findings that he is
2 sole shareholder fo NIM, and that he alone held ownership, financial interests, and
3 control of the corporate assets and liabilities.

4 18. My financial investigation also included a review of the bank account
5 records of Soloway and NIM, as provided by the respective banks.

6 19. NIM's bank records obtained from WestAmerica Bank (formerly The
7 Bank of the Redwoods) indicates that account # ****03285 was opened on
8 January 4, 1999, and remains open with Soloway as the only individual with signature
9 authority on the account.

10 20. Newport Internet Marketing's bank records obtained from Premierwest
11 Bank indicate that account *****4139 was opened on May 2, 2003 and closed on
12 May 28, 2004. Soloway was the only individual with signature authority on the
13 account.

14 21. The records provided by the WestAmerica and Premierwest Bank identify
15 specific items deposited into the accounts. These deposit items include wire transfers,
16 checks, money orders, and cash.

17 22. The individual items deposited into Premierwest Bank account
18 *****4139 consistently have comments on the memo lines stating, "Broadcast e-mail
19 software," "E-mail marketing," and "Advertising," indicating that they represent
20 payment for the sale of e-mail services offered by Newport Internet Marketing and
21 proceeds from the sale of software.

22 23. The individual deposit items into Premierwest Bank account #****1234
23 consist primarily of disbursements from PayPal, an internet based money transmitter
24 service. The deposit items into Premierwest Bank account #*****2676 deposit items
25 include disbursements from PayPal and individual checks that also have comments on
26 the memo lines stating, "Broadcast e-mail software," "E-mail marketing," and
27 "Advertising," indicating that they represent payment for the sale of e-mail services
28 offered by Newport Internet Marketing and proceeds from the sale of software.

1 24. The WestAmerica Account # ****03285 primarily contained deposits
 2 from credit card merchants such as Novus, American Express, and Bankcard Services.
 3 I have reviewed the NIM websites detailed in the Affidavit in Support of Search
 4 Warrant, and have verified that the credit cards listed above are accepted forms of
 5 payment. I reviewed the merchant credit card applications provided by the various
 6 credit card companies and verified that NIM represented that these credit card
 7 payments were to be accepted by its internet-based business. In addition, I reviewed
 8 the individual transactions within a daily batch deposit from the credit card merchants
 9 and concluded that the merchant deposits were from customers who purchased product
 10 or services from NIM and paid via credit card.

11 25. From the bank records, investment account statements, and various
 12 financial documents described and referenced within this affidavit, I have determined
 13 that Soloway and NIM's fraud and spamming scheme, described fully in the Affidavit
 14 for Search Warrant, generated income in excess of \$1.0 million from 2003 through
 15 2006. Based on information available at this time, I have determined that the
 16 proceeds were deposited in the accounts held by Soloway and NIM as follows:

18 Financial Institution	Acct.	2003	2004	2005	2006	Total
19 Bank of the Redwoods	3285	268,401.59	251,442.66	302,736.49	216,449.39	1,039,030.13
20 Premier West Bank	4139	8,617.93	2,370.00	0.00	0.00	10,987.93
21 Premier West Bank	2676	11,086.26	0.00	0.00	0.00	11,086.26
22 Premier West Bank	1234	10,035.00	0.00	0.00	0.00	10,035.00
23 PayPal	Multi.					81,836.33
24 Charles Schwab & Co	7454	0.00	0.00	10,000.00	0.00	10,000.00
25 Premier West Bank	1681	116,161.39	0.00	0.00	0.00	116,161.39
26 Washington Mutual	6423	5,862.67	10,840.00	0.00	0.00	16,702.67
27 Washington Mutual	6128	0.00	207,134.02	97,793.87	0.00	304,927.89
28 Wells Fargo	8814	0.00	23,080.18	0.00	0.00	23,080.18

1	Wells Fargo	6263	0.00	23,188.41	0.03	0.00	23,181.44
2	Wells Fargo	0141	0.00	0.00	25,100.33	0.00	25,1003.33
3	Wells Fargo	3243	0.00	0.00	0.00	15,128.81	15,128.81
4	Wells Fargo	8175	0.00	0.00	0.00	100.38	100.38
5	Sound Community Bank	2856	0.00	0.00	1,262.55	180.00	1,442.55
6	Epassport.com	3939	0.00	0.00	240.00	40,582.00	40,822.00
7	TOTAL DEPOSITS		420,164.84	518,055.27	437,133.27	272,440.58	1,647,793.96

8

9 26. In addition to NIM bank records I have reviewed e-commerce accounts.

10 These accounts allow payments and money transfers to be made through the Internet.

11 E-commerce accounts serve as an electronic alternative to traditional paper methods

12 such as checks and money orders.

13 27. The e-commerce accounts I reviewed include Google Merchant,

14 epassport.com, PayPal, and E-Bay records that were provided by the respective

15 companies. I reviewed the account registration information for these accounts and

16 noted that the accounts were registered to one or more of the following: Newport

17 Internet Marketing, NIM Corp, Robert A. Soloway, Bob Soloway, R. Soloway, and to

18 e-mail accounts known to be used by Soloway with an address of 1200 Western Avenue

19 Seattle, WA, as fully detailed in the Affidavit for Application of a Search Warrant.

20 28. The review of e-commerce accounts included PayPal accounts, which

21 facilitates the transfer of funds between two parties. Between 2003 and 2006, Soloway

22 opened eighteen PayPal Accounts, each registered to a separate e-mail address. Nine

23 of these accounts were designated as business accounts and nine were designated as

24 personal accounts.

25 29. I reviewed the transactions posted to the accounts and noted that the

26 income funds included comments stating, "Broadcast e-mail software," "E-mail

27 marketing," and "Advertising," indicating that the transactions represent payment for

28 e-mail services sold by Newport Internet Marketing and proceeds from the sale of

1 software.

2 30. From the PayPal records described in the paragraphs above, I have
3 determined that the electronic mail spamming scheme described herein generated
4 deposits in excess of \$81,000 from 2003 through 2006 that were deposited in PayPal
5 accounts. Based on information available at this time, I have determined that the
6 proceeds were deposited into the accounts as summarized below:

7	<u>Registered to:</u>	<u>Account Number</u>	<u>Opened</u>	<u>Total</u>
8	nim@cyberservices.com	1989915275618993231	10/17/2003	20,008.83
9	rsoloway@runbox.com	1340634501436136959	02/02/2005	7,500.00
10	theemailcompany@mailshack.com	1895180423547216904	10/11/2006	154.00
11	thebroadcastcompany@mailshack.com	1245168892165817118	10/11/2006	808.00
12	marketingassociates@mailshack.com	1368592183099076012	10/13/2006	139.00
13	emailmarketing@mailshack.com	1268876056812217955	10/13/2006	590.00
14	broadcastmarketing@mailshack.com	1455553951259741553	10/14/2006	195.00
15	marketingassociates@nerdshack.com	1350256294236526258	12/17/2006	433.19
16		TOTAL RECEIVED		81,836.33

17 31. In addition to the funds received in relation to the spam scheme, the
18 transaction comments also indicated that Soloway received funds related to the sale of
19 personal goods. The volume and duplicative items indicate that Soloway's Ebay
20 business included the sale of electronic goods such as video games, game consoles, and
21 clothing.

22 32. In addition, I noted that in 2003 Soloway's account, registered to e-mail
23 support@newportmarketing.com, contained 270 payments to other individuals totaling
24 approximately \$61,573. The comments for these transactions include, "Mailing to 10
25 million," "Mailing to 8 million," "Mailing Services," "Software Development," and
26 "Resending". The payments and corresponding comments indicate that Soloway paid
27 individuals and businesses to send electronic mail on his behalf.

28 33. I reviewed additional withdrawals and transfers out of the PayPal

1 accounts. I noted that the funds were withdrawn from the Paypal accounts through
2 checks, transfers to personal and business bank accounts, and through credit card
3 payments made to cards held by Robert A Soloway. The transfer of funds between
4 business and personal accounts in this manner further indicates that Soloway routinely
5 disregarded the legal corporate entity that he had established, and indiscriminately
6 commingled business and personal funds.

7 34. I have further reviewed the distributions made from Soloway's bank
8 accounts and e-commerce accounts, and have identified payments made to businesses
9 and individuals that supported and promoted the continued operation of the fraud and
10 spamming schemes. These financial transactions represent the proceeds of violations of
11 specified unlawful activities including, but not limited to violations of Title 18 U.S.C.,
12 Section 1341 (Mail Fraud), and Title 18, U.S.C. 1343 (Wire Fraud).

13 35. During the course of the scheme Soloway registered multiple internet
14 domains and leased space on internet servers to continue the operation of his internet-
15 based business. The payments made to these service providers were made to promote
16 and carry on the specified unlawful activities, namely mail and wire fraud. The records
17 that I have reviewed indicate that Soloway paid for these services with credit cards,
18 through internet transactions.

19 36. I have identified the credit card payments made by Soloway and
20 determined that the funds used to pay the credit card payments originated in whole or in
21 part from accounts containing funds from the fraud and spamming activity in which
22 Soloway was engaged; specifically, that the funds originated from the accounts for
23 which I am now seeking seizure warrants based on this affidavit. Details of those

24
25 payments include the following, regarding credit card payments made from 2004 -
26 2005:

27 \\
28 \\
29

1 Payments made from West America account 05703285:

2	Bank of America Visa:	\$16,775.77
3	Bank One Visa	\$ 412.34
4	Capital One Visa	\$ 2,072.25
5	Chase Visa	\$54,568.15
6	Click-to-Pay Visa	\$69,029.97
7	Discover E-Pay	\$ 9,201.50
8	MBNA Visa	\$ 6,011.86
9	Total:	\$158,071.84

10 Payments made from Wells Fargo account 1506243243:

11 On-line payments to Visa Cards \$14,602.00

12 Payments made from Epassport.com accounts:

13 withdrawal to Wells Fargo account \$13,448.00
 14 withdrawal to West America account \$36,960.77

15
 16 37. I reviewed the transactions that posted between December 2003 and
 17 January 2007 to Soloway's American Express, Business Platinum Card ****1005. I
 18 identified the following transactions as payments posted for server hosting services,
 19 internet domain name registration, and debt collection. The role that these services
 20 played in the fraud and spam scheme is fully detailed in the Affidavit for Application of
 21 a Search Warrant. The individual transactions are summarized below:

22	<u>Paid To:</u>	<u>Primary Service</u>	<u>Transactions</u>	<u>Total</u>
23	AIT, Computer Network	Server hosting	1	149.88
24	Cierra Group, Computer Network	Server hosting	6	521.30
25	Layered Technologies, Server Services	Server hosting	2	237.00
26	Singlehop, Server hosting	Server hosting	3	407.00
27	Sun Net, Inc. ISP Hosting Services	Server hosting	3	3,350.00
28	Zipservers, Commercial Equipment	Server hosting	6	448.80

1	Direct Debit Collection	Collections	7	380.00
2	Network Solutions, Internet Domain Name	Domain reg.	6	209.94
3	Register.com, Domain Name Register	Domain reg.	6	133.70
4		TOTAL		5,837.62

5 38. I reviewed the transactions that posted between December 2005 and
6 January 2007 to Soloway's JPMorgan Chase Bank Visa Credit Card ***5127. I
7 identified the transactions below as payments posted for server hosting services,
8 internet domain name registration, and related activities for purposes of promoting and
9 carrying on the fraud and scheme.

10	<u>Paid To</u>	<u>Primary Service</u>	<u>Transactions</u>	<u>Total</u>
11	NoBull Server	Server hosting	5	954.51
12	Cologuys	Server hosting	11	1,650.00
13	Millenium Digital Media	ISP	13	2,506.87
14	AOL Services	Internet Service	6	145.40
15	Constant Contact	E-mail marketing	9	310.00
16	Dot.Domainregistration	Domain registration	1	8.50
17	Epassporte	Cyber bank	42	12,605.75
18	Google	Advertising	5	474.56
19	Inflolink	Server hosting	1	121.84
20	Interweb Technologies	Server hosting	7	2,114.61
21	Jconnect Services	Fax & voicemail	12	180.00
22	Krypt Technologies	Server hosting	13	1,409.36
23	Moniker Online Services	Domain registration	1	18.99
24	Primus Telegroup	ISP	13	353.89
25	Register.com	Domain registration	8	163.69
26	WesternUnion	Money transmitter	55	17,202.40
27	Xdrive.com	Online storage	3	59.70
28		TOTAL		40,280.07

1 39. I reviewed the transactions that posted between December 2005 and
 2 January 2007 to Soloway's JPMorgan Chase Bank Visa Credit Card ***0918. I
 3 identified the transactions below as payments posted for server hosting services,
 4 internet domain name registration, and related activities for purposes of promoting and
 5 carrying on the fraud and spam scheme.

<u>Paid To</u>	<u>Primary Service</u>	<u>Transactions</u>	<u>Total</u>
Krypt Technologies	Web Hosting	13	1,599.24
Western Union	Money Transmitter	1	202.00

6
 7
 8
 9 40. During the course of the scheme Soloway shipped his software product to
 10 consumers. I have identified payments for shipping services provided by FedEx, a
 11 commercial interstate carrier. The payments to FedEx were made primarily by credit
 12 card. Each individual transaction potentially represents a violation of Title 18,
 13 United States Code, Section 1341 as fully detailed in the Affidavit for Application of a
 14 Search Warrant.

15 41. Between December 2003 and December 2006, Soloway shipped out
 16 approximately 2,760 shipments utilizing FedEx, totaling \$53,857 as documented by
 17 individual transactions posted to Soloway's American Express, Business Platinum
 18 Card ****1005.

19 42. During the course of the scheme Soloway operated NIM from 1200
 20 Western Avenue, Apartment E17, Seattle, WA, which is an apartment in Harbor Steps
 21 Apartments. Rent payments made to Harbor Steps Apartments allowed Soloway to
 22 promote and carry on the specified unlawful activity. The funds to pay the rent
 23 originated in whole or part from the fraud and spam activity. I have identified these
 24 payments, made primarily by checks and credit cards.

25 43. Between December 2005 and December 2006, Soloway initiated 27 rent
 26 payments totaling \$35,283 to Harbor Steps through rentpayment.com. Soloway
 27 utilized an internet website, various credit cards and varied the amounts paid. Based
 28 on my training, knowledge, and experience, I know this activity is consistent with


1 individuals trying to conceal or disguise the source or nature of their income. I have
 2 detailed below the 2006 rent payments made through rentpayment.com below:

3	<u>Payment Date</u>	<u>Amount</u>	<u>Credit Card</u>	<u>Ending Digits</u>
4	01/04/2006	1,855.00	Master Card	7517
5	01/04/2006	900.00	Visa	1217
6	02/06/2006	1,840.00	Visa	3178
7	02/06/2006	915.00	Visa	1217
8	03/05/2006	2,094.37	Visa	3338
9	03/05/2006	900.00	Visa	0918
10	04/06/2006	1,663.14	Master Card	2314
11	04/06/2006	831.57	Visa	1217
12	05/08/2006	1,800.00	Master Card	2314
13	05/08/2006	860.99	Visa	1217
14	06/05/2006	1,850.00	Master Card	2314
15	06/05/2006	976.23	Visa	1217
16	07/05/2006	1,800.00	Master Card	7517
17	08/05/2006	2,000.00	Master Card	7517
18	08/05/2006	925.99	Visa	1217
19	09/06/2006	2,087.99	Visa	7351
20	09/06/2006	1,000.00	Visa	1217
21	10/05/2006	1,900.00	Visa	7351
22	10/05/2006	950.00	Visa	1217
23	10/27/2006	900.00	Visa	1217
24	10/27/2006	1,802.15	Master Card	7517
25	12/05/2006	1,700.00	Master Card	7517
26	12/05/2006	850.00	Visa	1217
27	12/10/2006	125.65	Visa	3178

1 44. In addition, I have identified payments to the storage unit companies.
2 Shurgard and Public Storage. In a deposition given by Soloway on July 27, 2004 he
3 stated that he utilized a storage unit to store business records and one to store personal
4 property. I identified 10 payments made in 2006 on Soloway's JPMorgan Chase
5 Bank Visa Credit Card ***5127; two payments to Shurgard totaling \$269.19 and eight
6 payments to Public Storage totaling \$1,111.00.

7 **VI. CONCLUSION**

8 45. Based on my training and experience and the information set forth herein
9 and in the Application and Affidavit in Support of Search Warrant, attached hereto and
10 incorporated by reference herein, there is probable cause to believe that the income
11 earned by NIM, and therefore Soloway, and contained within financial and bank
12 accounts controlled by Soloway, constitutes income derived from the proceeds of
13 specified unlawful activities, committed in violation of federal laws including
14 Title 18 United States Code, Sections 1341 and 1343 (Mail Fraud and Wire Fraud). In
15 addition the accounts identified for seizure were used to pay credit card bills which in
16 turn were used for purchases to promote mail fraud and wire fraud, and therefore the
17 accounts are forfeitable as property involved in money laundering transactions.

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19 
20 Special Agent Silvia S. Reyes, Affiant
21 United States Treasury, Internal Revenue Service

22
23 AFFIDAVIT subscribed and sworn to before me this 23 day of May, 2007.

24
25 
26 MARY ALICE THEILER
27 UNITED STATES MAGISTRATE JUDGE