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(Rev.8/82)

SEARCH WARRANT ON WRITTEN AFFIDAVIT

COPY *Chen*

UNITED STATES DISTRICT COURT	CENTRAL DISTRICT OF CALIFORNIA	
UNITED STATES OF AMERICA v.	DOCKET NO.	MAGISTRATE'S CASE NO.
THE PREMISES KNOWN AS: 811 Cory Drive #7, Inglewood, CA 90302,	TO: ANY SPECIAL AGENT OF THE UNITED STATES POSTAL INSPECTOR OFFICE OR ANY OTHER AUTHORIZED OFFICER	

Affidavit(s) having been made before me by the below-named affiant that he/she has reason to believe that on the premises known as SEE ATTACHMENT A

in the Central District of California

there is now being concealed certain property, namely: SEE ATTACHMENT B

and as I am satisfied that there is probable cause to believe that the property so described is being concealed on the person or premises above-described and the grounds for application for issuance of the search warrant exist as stated in the supporting affidavit(s), which are incorporated herein by reference and attached hereto.

YOU ARE HEREBY COMMANDED to search on or before ten (10) days (not to exceed 10 days) the person or place named above for the property specified, serving this warrant and making the search in the daytime--6:00 A.M. to 10:00 P.M. and if the property be found there to seize it, leaving a copy of this warrant and receipt for the property taken, and prepare a written inventory of the property seized and promptly return this warrant to the duty U.S. Magistrate Judge as required by law.

NAME OF AFFIANT RYAN W. SUBLETT	SIGNATURE U.S. MAGISTRATE JUDGE	DATE/TIME ISSUED January 9, 2003
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**United States Judge or Judge of a State Court of Record.

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ATTACHMENT A

THE PREMISES TO BE SEARCHED:

The premises to be searched are further described as follows:

a. 811 Cory Drive #7, Inglewood, CA 90302 is a two story multi-unit apartment complex located on the northwest corner of the block. The complex is a light yellow stucco building with white wood trim. On the apartment complex wall facing east, the numbers "811" are displayed prominently in black letters on the white wood trim. The entry door to 811 Cory Drive #7 is located on the northwest side of the complex on the second floor. The entry door is a green, wood door facing south, and the number "7" is displayed in green letters.

b. A white Pontiac Grand Am, California license plate number 4RXM721.

ATTACHMENT B

THE ITEMS TO BE SEIZED:

The items to be seized are evidence of violations of Title 18, United States Code, Section 510 (a) (2): Passing United States Treasury Checks Bearing Forged Endorsements, specifically,

- a. United States Treasury checks, envelopes, and other related mail matter bearing names and addresses other than Wilona A. Moore, 811 Cory Drive, Apt #7, Inglewood, California 90302;
- b. Any bags, boxes, or other containers used to conceal and store the above Treasury checks;
- c. Books, records, receipts, bank statements and records, wire transfer records, money drafts, letters of credit, money order and cashier's checks receipts, bank checks, accountings of expenditures made and payments received, safe deposit keys and records, money containers, and notes showing payments, receipt, concealment, transfer, or movement of assets generated from the sale of stolen U.S. Treasury checks;
- d. Personal telephone and address books and listings, letters, cables, telegrams, telephone bills, FAX messages, FAX logs, telephone message records, telephone electronic storage devices, personal notes, photographs, calendars, and other items reflecting names, addresses, telephone numbers, communications, and illegal activities of associates in trafficking of stolen U.S. Treasury checks;
- e. Financial instruments purchased with large amounts

of currency derived from the sale of stolen U.S. Treasury checks. Including traveler's checks, bonds, stock certificates, cashier's checks, money orders, and certificates of deposit; money counting machines; money wrappers, boxes, bags, briefcases, suitcases or containers used to carry stolen U.S. Treasury Checks;

f. Records, documents and deeds reflecting the purchase or lease of vehicles, precious metals, jewelry or other items, obtained with the proceeds of the sales of stolen U.S. Treasury checks.

g. Currency derived from the sale of stolen U.S. Treasury checks;

h. Photographs of co-conspirators;

i. Indicia of occupancy, residency and/or ownership of the premises to be searched;

j. Caller identification terminals, pagers, and their stored information;

k. Safes, lock boxes or receptacles where evidence listed above in sections a through j could be hidden.

A F F I D A V I T

I, Ryan W. Sublett, being duly sworn, hereby depose and say:

1. I am a United States Postal Inspector in the Southern California Division of the United States Postal Inspection Service and have been so employed for one year. I am currently assigned to the Southern California Division Internal Crimes Team, which is responsible for conducting mail theft investigations in Los Angeles, California.

2. This affidavit is made in support of an application for search warrants to search the premises and vehicle described below for evidence of violation of Title 18, United States Code, Section 510(a)(2): Passing United States Treasury Checks Bearing Forged Endorsements. This affidavit is submitted solely to establish probable cause for the requested search warrant and does not purport to set forth all of my investigation into or knowledge of this matter.

PREMISES TO BE SEARCHED

3. 811 Cory Drive #7, Inglewood, CA 90302 is a two story multi-unit apartment complex located on the northwest corner of the block ("SUBJECT PREMISES"). The complex is a light yellow stucco building with white wood trim. On the apartment complex wall facing east, the numbers "811" are displayed prominently in black letters on the white wood trim. The entry door to 811 Cory Drive #7 is located on the northwest side of the complex on the second floor. The entry door is a green, wood door facing south, and the number "7" is displayed in green letters.

VEHICLE TO BE SEARCHED

4. A white Pontiac Grand Am, vehicle identification number 1G2NE55MXSM578025, California license plate number 4RXM721 ("SUBJECT VEHICLE").

5. The facts and information contained in this affidavit are based on my personal knowledge, as well as that of other Postal Inspectors and law enforcement officers involved in this investigation. All observations not personally made by me were related to me by the persons who made them.

BACKGROUND

6. Based on my training, experience and my consultation with other Postal Inspectors, who have over 50 years of combined service, I know that there are a number of rings of individuals who steal United States Treasury checks from the mail. These rings typically operate as follows:

a. An individual steals United States Treasury checks from the United States Mail in a variety of ways, including theft by a collusive postal, airport employee, and/or contract employee, or theft by a non-postal participant who takes the checks from the intended customer's mailbox;

b. The stolen United States Treasury checks are then disbursed to individuals who deposit the falsely endorsed checks into legitimate or fraudulently opened bank accounts via ATMs, or bank branch deposits. The money is withdrawn from the accounts by the legitimate account holder or fictitious owner of the account through the use of ATM's, bank branch withdrawals, or

purchase of money orders or cashiers checks.

c. These individuals deposit the checks into the bank account little-by-little in order to minimize detection and a pattern exists where withdrawals occur shortly after the checks are deposited into the account.

d. It is common for individuals who steal U.S. Treasury checks to conceal the proceeds derived from negotiating the stolen U.S. Treasury checks proceeds and records of such transactions, within residences and automobiles, for ready access and also to conceal such items from law enforcement authorities.

e. It is common for individuals involved in the theft of U.S. Treasury checks to maintain records of past events in personal calendars, maintain phone records, possess photographs, address books or listings containing phone numbers, addresses, and names of associates involved in the theft scheme.

INVESTIGATION OF MOORE

7. On or about October 6, 2002, I received a complaint from Jeffrey Roth stating that he was expecting a United States Treasury check in the mail, which he never received. The check was an IRS tax refund check in the amount of \$3,256.00. Roth learned from Washington Mutual Bank forgery department that his check had been cashed in Hollywood, California by Wilona Andrea Moore ("Moore") and that Moore's account number appeared on the back of the check. Roth stated he did not know Moore and did not give her permission to cash his check.

8. On October 8, 2002, I contacted Marilyn Harris, a

Washington Mutual Bank Fraud Investigator, regarding Moore's bank account. Ms. Harris provided the following information:

a. On January 16, 2002, Moore opened a Washington Mutual Bank checking account and savings account. Moore presented California Driver License #B8160480 and Los Angeles County employee badge #465821 as identification when the account was opened.

b. In March, April, and May 2002, a total of twelve United States Treasury checks totaling \$33,400.38 were deposited into Moore's accounts via ATMs. Each bore an endorsement in the name of the payee. Funds were withdrawn from the accounts via office and ATM withdrawals at various locations in the Los Angeles County area.

c. On June 6, 2002, Washington Mutual closed Moore's savings account and on July 22, 2002, Washington Mutual closed Moore's checking account. The total loss, which was charged to the checking account, is \$28,610.70.

d. All of the twelve stolen United States Treasury checks were mailed to individuals living in Los Angeles County.

e. When Moore opened her accounts, she provided 811 Cory Drive #7, Inglewood, California 90302 ("SUBJECT PREMISES") as her address.

9. On or about October 7, 2002, I obtained Moore's driver license information from the California Department of Motor Vehicles. The driver license record shows that the driver license #B8160480 is a valid driver license issued to Moore.

This license is the same license number that was used to open Moore's Washington Mutual bank account.

10. On October 10, 2002, I spoke with Moore, at SUBJECT PREMISES, which appeared to be her residence. Moore agreed to be interviewed at the USPIS Airport Domicile office. Prior to any questioning, Moore was advised of her constitutional rights via P.S. Form 1067, United States Postal Inspection Service Warning and Waiver of Rights. Moore read and signed both the warning and waiver portions of the form, stated she understood her rights, and agreed to answer questions. Moore provided the following information:

a. She stated that she was having problems with her 1st City Savings Federal Credit Union account and opened a Washington Mutual Bank account in January 2002 to direct deposit her tax refund check into. When the refund check was direct deposited into her 1st City Saving Bank account by mistake, she closed the Washington Mutual account, at the end of January 2002. She claimed that she never conducted any transactions on the Washington Mutual account. Moore said she made no deposits, no withdrawals, and never used the ATM card issued to her. Later in the interview, she mentioned she never received an ATM card before closing the account.

b. Moore confirmed the signature on the photo copy of the original Washington Mutual signature card used to open the bank account was her own.

c. Moore stated that she applied for a car loan at her credit union. She said that the credit union denied her a loan because she owed \$28,000 to Washington Mutual. She stated that she received a collection notice from Washington Mutual regarding the \$28,000 she owed, and she called the bank to tell them she did not know anything about the money, and threw the collection notice away.

d. She denied depositing the stolen Treasury checks into her account and stated that neither her fingerprints nor her handwriting would be on the checks because she never touched them or endorsed them.

e. Moore provided a fingerprint, palmprint, and handwriting exemplar.

11. On October 16, 2002, I submitted Moore's handwriting exemplars and fingerprints to Secret Service Agent Gregory Auer to be sent to the Secret Service laboratory for analysis and comparison with fingerprints and handwriting on the United States Treasury checks.

12. On October 18, 2002, I reviewed Washington Mutual's records regarding Moore's bank accounts and learned the following:

a. Numerous office withdrawals were made at the Washington Mutual Branch #892 located at 10701 West Pico Boulevard, Los Angeles, CA 90084. A majority of these withdrawals were conducted by bank tellers #109, Leonardo Ortiz and #116, Florentina Morales.

13. On November 1, 2002, I subpoenaed the 1st City Savings Federal Credit Union bank account #0000089517 in the name of Wilona Moore. Records showed the following information:

a. A total of 6 ATM withdrawals were conducted at 10701 W. Pico Blvd, Los Angeles, CA 90084, 4401 Crenshaw Blvd, Los Angeles, CA 90043, and 5791 Rodeo Road, Los Angeles, CA 90016. These locations are identical to the locations where ATM withdrawals and office withdrawals occurred with Moore's Washington Mutual bank accounts.

b. On April 22, 2002, three 1st City Savings Federal Credit Union ATM withdrawals were conducted and one Washington Mutual office withdrawal was performed at the 10701 West Pico Boulevard location.

14. On November 6, 2002, I interviewed Washington Mutual Bank teller Leonardo Ortiz, who provided the following information:

a. Ortiz confirmed that his handwriting was on the back of the withdrawal/deposit slip dated April 29, 2002 for withdrawal of \$7,800.00 from Moore's account. Ortiz verified that his handwriting was on the back of the slip dated May 6, 2002 for \$1,500.00 from Moore's account. Ortiz confirmed that he was teller #109 at branch #892, as indicated on the back of the withdrawal/deposit slips.

b. Ortiz stated that he remembered the person that conducted the transactions on April 29, 2002, and May 6, 2002, on Moore's account.

c. After Ortiz completed an Inspection Service Photographic Admonition Form, Ortiz was shown a photo spread which contained a Department of Motor Vehicles photo of Wilona Moore (labeled as #3) and five other similar photos. He positively identified the photo of Wilona Moore as the person who made the April 23 and May 7, 2002 withdrawals.

d. Ortiz stated that Moore conducted approximately two to four transactions with him and he approved other transactions with her for other tellers at the bank.

15. On November 12, 2002, I interviewed former Washington Mutual Bank teller Florentina Morales, who provided the following information:

a. Morales confirmed that the handwriting on the back of the withdrawal slip dated April 23, 2002 for \$2,350.00 was her own. She verified that the handwriting on the back of the slip dated May 7, 2002 for \$3,000.00 was her own. Morales confirmed that she was teller #116 at branch #892, as indicated on the back of the withdrawal/deposit slips.

b. After Morales completed an Inspection Service Photographic Admonition Form, she was shown the same photo spread as was shown to bank teller Ortiz. Morales recognized Moore as a regular customer who had conducted transactions with her in the past.

c. By looking at the withdrawal/deposit slips, Ortiz was unable to positively state that Moore was the person who made the April 23, 2002 and May 7, 2002 withdrawals.

16. On or about October 30, 2002, I submitted six original Washington Mutual withdrawal/deposit slips from Moore's account to United States Secret Service Agent Gregory Auer for fingerprint and handwriting analysis.

17. On December 17, 2002, I obtained the laboratory analysis results from Agent Auer. Special Agent Auer informed me that he had ordered copies of the stolen United States Treasury checks that had been deposited into Moore's account for laboratory analysis. The handwriting and latent prints on the United States Treasury checks and withdrawal/deposit slips were compared with the fingerprints and handwriting of Moore resulting in the following identifications:

a. A latent fingerprint of Moore was developed on Washington Mutual withdrawal/deposit slip, in the name of Wilona A. Moore, bearing the account number 389453291-6, in the amount of \$3,300.00, and dated April 6, 2002. I know from my review of Washington Mutual's bank records that this office withdrawal occurred one day after a \$3,324.00 United States Treasury check made out to Gary A. Carr was deposited into Moore's account via ATM.

b. Handwriting analysis revealed evidence that Moore probably prepared the questioned writing that appeared on the six withdrawal/deposit slips.

18. On December 27, 2002, Magistrate Judge Segal issued an arrest warrant for Wilona Andrea Moore.

PROBABLE CAUSE THAT EVIDENCE OF MOORE'S CRIMES WILL BE FOUND IN
SUBJECT PREMISES AND SUBJECT VEHICLE

19. On or about January 3, 2003, I conducted a Department of Motor Vehicles query and learned that Moore is the registered owner of the SUBJECT VEHICLE.

20. On or about January 3, 2003, I surveilled the SUBJECT PREMISES and saw the SUBJECT VEHICLE parked in front.

21. On or about January 9, 2003, I spoke with the mail carrier responsible for delivering mail to the SUBJECT PREMISES. The mail carrier confirmed that Moore is currently receiving mail at that address.

ITEMS TO BE SEIZED

22. The items to be seized are evidence of violations of Title 18, United States Code, Section 510(a)(2): Passing United States Treasury Checks Bearing Forged Endorsements, specifically,

a. United States Treasury checks, envelopes, and other related mail matter bearing names and addresses other than Wilona A. Moore 811 Cory Drive, Apt #7, Inglewood, California 90302;

b. Any bags, boxes, or other containers used to conceal and store the Treasury checks;

c. Books, records, receipts, bank statements, collections notices, and records, wire transfer records, money drafts, letters of credit, money order and cashier's checks receipts, bank checks, accountings of expenditures made and payments received, safe deposit keys and records, money

containers, and notes showing payments, receipt, concealment, transfer, or movement of assets generated from the sale of stolen U.S. Treasury checks;

d. Personal telephone and address books and listings, letters, cables, telegrams, telephone bills, FAX messages, FAX logs, telephone message records, telephone electronic storage devices, personal notes, photographs, calendars, and other items reflecting names, addresses, telephone numbers, communications, and illegal activities of associates in trafficking of stolen U.S. Treasury checks;

e. Financial instruments purchased with large amounts of currency derived from the sale of stolen U.S. Treasury checks. Including traveler's checks, bonds, stock certificates, cashier's checks, money orders, and certificates of deposit; money counting machines; money wrappers, boxes, bags, briefcases, suitcases or containers used to carry stolen U.S. Treasury Checks;

f. Records, documents and deeds reflecting the purchase or lease of vehicles, precious metals, jewelry or other items, obtained with the proceeds of the sales of stolen U.S. Treasury checks.

g. Currency derived from the sale of stolen U.S. Treasury checks;

h. Indicia of occupancy, residency and/or ownership of the premises to be searched;

i. Caller identification terminals, pagers, and their stored information;

j. Safes, lock boxes or receptacles where evidence listed above in sections a through j could be hidden;

23. Based on the foregoing facts and my training and experience, I believe there is probable cause to believe that the premises and vehicles described in paragraph 3 above contain evidence of a violation of Title 18, United States Code, Section 510 (a) (2), Passing Stolen United States Treasury Checks Bearing Forged Endorsements.

Ryan W. Sublett
United States Postal Inspector

Subscribed and sworn before me
on this _____ day of January, 2003.

United States Magistrate Judge