

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

IN RE: FORFEITURE OF:

CASE NO.:

TWO MILLION FORTY-EIGHT THOUSAND
TWO HUNDRED TWENTY-NINE DOLLARS
AND 48/100 (\$2,048,229.48)
UNITED STATES CURRENCY

NOTICE OF FILING APPLICATION FOR PROBABLE CAUSE

COMES NOW, the Petitioner, GREGORY TONY, Sheriff of Broward County, Florida, by and through the undersigned attorney in a civil cause of forfeiture, and hereby files this Application for Probable Cause in reference to the above-named case.

DATED this 23rd day of August, 2022.

GREGORY TONY
SHERIFF OF BROWARD COUNTY

By:

Kristin Mackenzie
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**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

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TWO HUNDRED TWENTY-NINE DOLLARS
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**APPLICATION FOR PROBABLE CAUSE FOR FORFEITURE
UNDER THE FLORIDA CONTRABAND FORFEITURE ACT**

Petitioner, GREGORY TONY, Sheriff of Broward County, Florida, by and through the undersigned counsel makes application to this Court for a determination of probable cause pursuant to §932.703 (2)(a), Fla. Stat. (2022), based on the allegations of fact contained in the attached sworn affidavit for forfeiture. In support, Petitioner states as follows:

1. Pursuant to the Florida Contraband Forfeiture Act, §932.703(2)(a) (2022), when a seizure of property is made under the Florida Contraband Forfeiture Act, the seizing agency shall apply, within 10 business days after the date of the seizure, to a court of competent jurisdiction for an order determining whether probable cause exists for the seizure of the property. The subject property was seized on August 2, and August 3, 2022 under Broward Sheriff's Office Case No. 90-1903-004466.

2. Upon receipt of an application for probable cause, the court must determine:
- a. Whether an owner of the property was arrested for a criminal offense that forms that basis for determining the seized property is contraband, or if not, whether an exception to the arrest requirement applies; and,
 - b. Whether probable cause exists for the property seizure under the Florida Contraband Forfeiture Act.

3. Petitioner contends that this application for probable cause has been applied for within ten (10) business days of the property seizure, and that the requirements specified in Section 932.703(1)(a) have been satisfied, based on the fact that one or more of the following facts exist:

- the owner of the property was arrested for a criminal offense that forms the basis for determining the property is a contraband article under s. 932.701, Florida Statutes;
- The owner of the property cannot be identified after a diligent search;

The person in possession of the property denies ownership and the owner of the property cannot be identified by means that were available to the employee or agent of the seizing agency at the time of the seizure;

the owner of the property is a fugitive from justice or is deceased;

an individual who does not own the property was arrested for a criminal offense that forms the basis for determining that the property is a contraband article under s. 932.701 and the owner of the property had actual knowledge of the criminal activity;

the owner of the property agreed to be a confidential informant as defined in s. 914.28;

the property is a monetary instrument.

4. Petitioner further contends that the facts and circumstances in the sworn affidavit for forfeiture establishes probable cause for the seizure of the property, as such property is subject to seizure and forfeiture under the Florida Contraband Forfeiture Act as a contraband article.

WHEREFORE, Petitioner, GREGORY TONY, as Sheriff of Broward County, Florida, through undersigned counsel, respectfully requests that this Court enter the attached Order on Application for Probable Cause Under the Florida Contraband Forfeiture Act, finding probable cause to maintain this forfeiture action, and to hold such property until the issue of a determination of title is resolved pursuant to the procedures set forth in the Florida Contraband Forfeiture Act.

I HEREBY ATTEST that a copy of this Application and attached Affidavit have been submitted this 10th day of August, 2022.

Respectfully submitted,

GREGORY TONY
SHERIFF OF BROWARD COUNTY

By: Kristin Mackenzie
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**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

IN RE: SEIZURE OF

TWO MILLION FORTY-EIGHT THOUSAND
TWO HUNDRED TWENTY-NINE DOLLARS AND 48/100
(\$2,048, 229.48) IN UNITED STATES CURRENCY

AFFIDAVIT IN SUPPORT OF PROBABLE CAUSE FOR FORFEITURE

Detective Benjamin Dusenbery, who being duly sworn, deposes and says:

1. Your Affiant is a Detective with the Fort Lauderdale Police Department and is also deputized by the Broward County Sheriff's Office as a deputy sheriff. Your Affiant has been a sworn Law Enforcement Officer for over twenty years. Your Affiant has been a police detective since 2006. Your Affiant is currently assigned to the Broward County Sheriff's Office Strategic Investigations Division, Money Laundering Task Force, (hereinafter referred to as the MLTF), in Broward County, Florida. Your Affiant has served in this capacity for almost fourteen years. The MLTF is a multi-agency task force comprised of local law enforcement agencies working in conjunction with State and Federal law enforcement agencies. The MLTF is charged with the investigation of complex criminal organizations, sophisticated financial crime cases, and large-scale money laundering operations. Your Affiant has received formal training in Forensic Accounting, Organized Crime, Financial Investigative Techniques, Advanced Money Laundering, Trade Based Money Laundering, Cryptocurrency Fundamentals, and Blockchain Analytics. Your Affiant has completed the formal training program and is a Certified Anti-Money Laundering Specialist (CAMS) as provided by the Association of Certified Anti-Money Laundering Specialists (ACAMS). Your Affiant also has completed the formal training program and is a Certified Specialist in Asset Recovery (CSAR) as provided by the International Association for Asset Recovery (IAAR). Your Affiant has specific knowledge

regarding the government regulated foreign exchange market in Brazil, the applicable Brazilian laws, as well as the parallel currency market that exists in Brazil to circumvent those laws. Your Affiant has met with Law Enforcement Officials in Brazil on multiple occasions to share information and coordinate investigations related to the parallel currency market and sophisticated trade-based money laundering schemes.

2. Because this affidavit is submitted for the limited purpose of establishing probable cause for a seizure, it does not contain each and every fact known to Your Affiant about this investigation; rather, it contains only those facts necessary to establish probable cause for the seizure.

3. On August 3, 2022, the following property (hereinafter referred to as the "Seized Property"), was seized under Case No. 90-1903-004466 as a contraband article pursuant to the Florida Contraband Forfeiture Act:

\$2,048,229.48 in United States Currency

4. Your Affiant asserts that he has probable cause to believe and do believe that the Seized Property has become and is a contraband article subject to seizure and forfeiture pursuant to §812.014, and Money Laundering §896.101, Florida Statutes, in that:

a. Pursuant to §932.702, Florida Statutes, it is unlawful to conceal, or possess, or use any contraband article as an instrumentality in the commission of or in aiding or abetting in the commission of any felony or violation of the Florida Contraband Forfeiture Act. § 932.702(4), Fla. Stat. (2022).

b. "Contraband" is defined under Chapter 932, Florida Statutes, as including any personal property, including but not limited to, any vessel, aircraft, item, object, tool, substance, device, weapon, machine, vehicle of any kind, money, securities, books, records, research, negotiable instruments, or currency, which was used or was attempted to be used as an instrumentality in the commission of, or in aiding or abetting in the

commission of, any felony, whether or not compromising an element of the felony, or which is acquired by proceeds obtained as a result of a violation of the Florida Contraband Forfeiture Act. § 932.701(2)(a)5, Fla. Stat. (2022).

c. Any contraband article, vessel, motor vehicle, aircraft, other personal property, or real property used in violation of any provision of the Florida Contraband Forfeiture Act, or in, upon, or by means of which any violation of the Florida Contraband Forfeiture act has taken or is taking place, may be seized and shall be forfeited subject to the provisions of the Florida Contraband Forfeiture Act. §932.703(1)(a), Fla. Stat. (2022).

d. All property, real or personal, including money, used in the course of, derived from, or realized through, conduct in violation of a provision of §§895.01 to 895.05, Florida Statutes, relating to "Racketeering," is subject to civil forfeiture. See Fla. Stat. §895.05(2)(a) (2022).

e. Based upon the above-described facts, there is Probable Cause to believe that all funds on deposit and/or in clearing in the listed accounts (Hereinafter referred to as "Funds") are contraband under Chapter 932, Florida Statutes, as such Funds, accounts, as an instrumentality in the commission of, or in aiding or abetting in the commission of, to wit:

f. Money Laundering in violation of §896.101, Florida Statutes; § 560.125, Fla. Statutes, **ENGAGING IN THE BUSINESS OF MONEY SERVICE BUSINESS WITHOUT A LICENSE** of the aforesaid in violation of the Florida Contraband Forfeiture Act or acquired by proceeds obtained as a result thereof; and/or is personal property used in the course of, intended for use in the course of, derived from, or realized through conduct in violation of Racketeering laws, §895.01 through §895.05, Florida Statutes.

g. Currency, which was used, is being used, was attempted, or intended to be used in violation of any provision of Chapter §812.014 and Chapter 896.101, becomes a contraband article. § 932.701(2)(a), Fla. Stat. (2022).

h. On or about August 3, 2022, the currency was possessed, concealed, or conveyed as a contraband article in violation of Chapter 932, the totality of the circumstances being such as to establish a cause of action demonstrating a nexus between the currency and violations of chapters 812 (Theft) and 896 (Money Laundering) as the funds were used or were attempted to be used as an instrumentality in the commission of, or in aiding or abetting in the commission of, felony violations of Grand Theft 1^o as set forth in §812.014, and Money Laundering as set forth in §896.101, Florida Statutes.

i. Currency possessed, concealed, or conveyed as a contraband article in violation of any provision of the Florida Contraband Forfeiture Act, or in, upon, or by means of which any violation of the Act has taken or is taking place, may be seized, and shall be forfeited subject to the provisions of §§ 932.701(2)(a), Fla. Stat. (2022).

j. The Florida Contraband Forfeiture Act defines contraband articles as: Any personal property, including but not limited to, any vessel, aircraft, item, object, tool, substance, device, weapon, machine, vessel of any kind, vehicle of any kind, **money**, securities, books, records, research, negotiable instruments, or currency, which was used or was attempted to be used as instrumentality in the commission of, or in aiding or abetting in the commission of, any felony, whether or not comprising an element of the felony, or **which is acquired by proceeds** obtained as a result of a violation of the Florida Contraband Forfeiture Act. §932.701(2)(a)5, Fla. Stat. (2021) (emphasis added)

5. The seizure of the Seized Property was authorized under the Florida Contraband Forfeiture Act, because the Subject Property is contraband and (check all that apply):

The owner of the property was arrested for a criminal offense that forms the basis for determining that the property is a contraband article;

The owner of the property cannot be identified after a diligent search;

- The person in possession of the property denies ownership and the owner of the property cannot be identified by means that were available to me at the time of the seizure
- The owner of the property is a fugitive from justice;
- The owner of the property is deceased;
- The individual who was arrested does not own the property, but the owner of the property had actual knowledge of the criminal activity;
- The owner of the property has agreed to be a confidential informant as defined in s. 914.28.
- The property is a monetary instrument.

6. Your Affiant presents the following facts to establish probable cause that the Seized Property is contraband subject to seizure and forfeiture under the Florida Contraband Forfeiture Act:

a) The facts and circumstances set forth below in this affidavit demonstrate that there is probable cause to believe that The Funds located in accounts:

HELD AT BANK OF AMERICA:

NO. 898133069502 IN THE NAME OF CELL WORLD ELECTRONICS CORP.
NO. 898101667567 IN THE NAME OF JOV GLOBAL TRADING CORP.
NO. 898130238705 IN THE NAME OF MMV TRADING CORP.
NO. 898114129597 IN THE NAME OF VEPLA TRADING & LOGISTICS LLC

HELD AT CITIBANK:

NO. 3290420905 IN THE NAME OF AMAZING IMPORT & EXPORT CORP.
NO. 9118972795 IN THE NAME OF CELL WORLD ELECTRONICS CORP.
NO. 3290420536 IN THE NAME OF DELTA MACHINE TRADING CORP.
NO. 9117742939 IN THE NAME OF JOV GLOBAL TRADING CORP.
NO. 3290417620 IN THE NAME OF M4M IMPORT & EXPORT CORP.
NO. 9116039834 IN THE NAME OF MMV TRADING CORP.
NO. 3290427173 IN THE NAME OF T6P TECH CORP.
NO. 9117744953 IN THE NAME OF GF TRADING SOLUTIONS CORP.
NO. 9116035757 IN THE NAME OF WWB VENTURES LLC

HELD AT JP MORGAN CHASE BANK:

NO. 817796011 IN THE NAME OF AMAZING IMPORT & EXPORT CORP.
NO. 837618971 IN THE NAME OF CELL WORLD ELECTRONICS CORP.
NO. 787502811 IN THE NAME OF DELTA MACHINE TRADING CORP.

NO. 825016816 IN THE NAME OF JOV GLOBAL TRADING CORP.
NO. 788657630 IN THE NAME OF M4M IMPORT & EXPORT CORP.
NO. 795365755 IN THE NAME OF MMV TRADING CORP.
NO. 795288625 IN THE NAME OF T6P TECH CORP.

HELD AT REGIONS BANK:

NO. 0322343970 IN THE NAME OF VEPLA TRADING & LOGISTICS LLC

HELD AT TRUIST FINANCIAL:

NO. 1100019408432 IN THE NAME OF CELL WORLD ELECTRONICS CORP.

were used or were attempted to be used as an instrumentality in the commission of, or in aiding or abetting in the commission of, felony violations of money laundering by an entity engaged in the business of a Money Service Business without a license, as set forth in §896.101 and §560.125, Florida Statutes.

b) Because this affidavit is submitted for the limited purpose of establishing probable cause for a seizure warrant, it does not contain each and every fact known to your Affiant about this investigation; rather, it contains only those facts necessary to establish probable cause for a Seizure Warrant.

**TRADE BASED MONEY LAUNDERING AND THE
PARALLEL CURRENCY MARKET**

c) The Financial Action Task Force (FATF) is an inter-governmental body established in 1989 at the G-7 summit in Paris. The objectives of the FATF are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system.

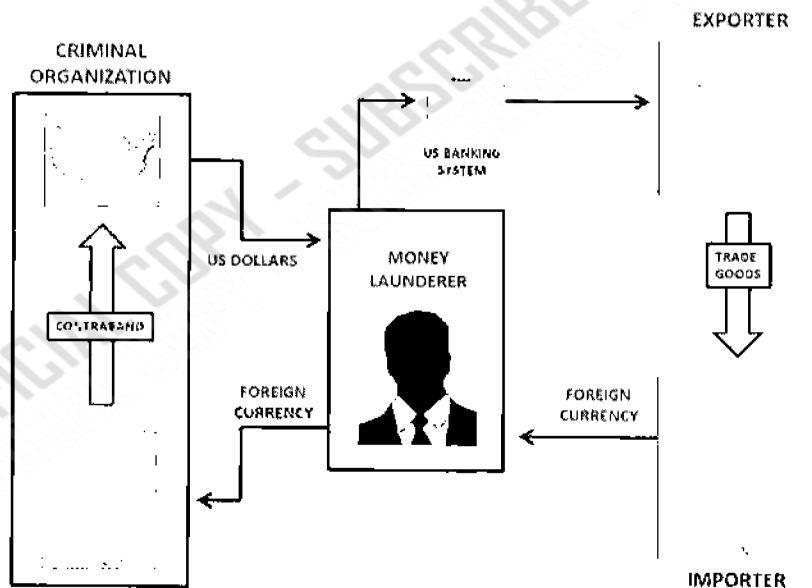
d) According to the FATF, there are three main methods by which criminal organizations and terrorist financiers move money for the purpose of disguising its origins and integrating it into the economy. The first is through the use of the financial system; the second involves the physical movement of money (e.g. through the use of cash couriers); and the third is through the physical movement of goods through the trade system.

e) The international trade system is subject to a wide range of risks and

vulnerabilities that can be exploited by criminal organizations and terrorist financiers. In part, these arise from the enormous volume of trade flows, which obscures individual transactions; the complexities associated with the use of multiple foreign exchange transactions and diverse trade financing arrangements; the commingling of legitimate and illicit funds; and the limited resources that most customs agencies have available to detect suspicious trade transactions.

f) Criminal organizations operating in the United States, utilize trade-based money laundering schemes to transfer funds across borders through trade-based transactions (e.g., imports and exports of commercial merchandise) and to disguise the illicit origins of their criminal proceeds.

g) The following diagram illustrates one variation of a basic trade-based money laundering scheme:



h) Many businesses engaged in international trade operate using a "parallel market" or monetary system in the United States and other countries. Generally, customers of the parallel market located outside of the United States pay a higher exchange rate through the use of the parallel market than they would otherwise be able to obtain through the legitimate local Government

controlled exchange system. The customers of the parallel market are willing to pay the higher exchange rates because this system allows them to smuggle or underreport the value of goods imported into their country from the United States in order to avoid local taxes. So even though they are paying a higher currency exchange rate, their overall profits are significantly higher since they are avoiding local import fees and taxes on their purchased goods.

i) Specific to South America, importers utilize the parallel market to circumvent the local central banks and to fraudulently avoid paying duties on goods being imported. Research has illustrated a multi-billion-dollar discrepancy in trade data between United States exports and South American imports. It is believed that the discrepancy is due to undervaluation and smuggling that occurs when goods are purchased and paid for on the parallel market instead of through official and legitimate means. South American authorities report that money laundering locally is primarily related to drug trafficking, corruption, organized crime, and trade in contraband.

j) Profits from narcotics sales is one of the main sources of currency sold on the parallel market. This currency is usually located in the country where the narcotics are sold for example, the United States. The drug trafficker is willing to sell his/her currency to a currency broker because it alleviates the need for the currency to be bulk smuggled or removed from the country by some other means by the drug trafficker.

k) Criminal organizations utilize this trade-based money laundering scheme to transfer funds across borders through trade-based transactions (e.g., imports and exports of commercial merchandise) and to disguise the illicit origins of their criminal proceeds. The person(s) involved in these illegal enterprises receive a faster "turn around" on their money (profits and operating capital), and the risk for moving the currency is now assumed by the broker.

l) The broker then directs third party payments and fund transfers to be made on behalf of their "customers," utilizing the illicit funds.

m) Ciudad Del Este, Paraguay is a major drug transit and money

laundering center in the tri-border area. The Tri-Border Area, comprising Paraguay, Argentina, and Brazil, is home to a multi-billion-dollar contraband trade that facilitates much of the money laundering in Paraguay and the other neighboring countries. The area is well known for arms and narcotics trafficking, document forging, smuggling, counterfeiting, and violations of intellectual property rights, with the illicit proceeds from these crimes as sources of laundered funds. Transnational criminal organizations operating in these three countries launder the proceeds from narcotics trafficking and other illicit activities through banks and non-bank financial sector entities. Paraguay's progress in combating money laundering is impeded by widespread corruption, burdensome bureaucracy, and the fear of reprisal against regulatory and supervisory authorities.¹

n) Money launderers and transnational criminal syndicates are able to take advantage of Paraguay's financial system due to weak controls in the financial sector, porous borders, the continued use of bearer bonds, unregulated exchange houses, lax or no enforcement of cross-border transportation of currency, and ineffective and/or corrupt officials. In addition, while there are laws criminalizing public-sector corruption, private-sector corruption has not been criminalized. According to [export.gov](https://www.export.gov), in Paraguay there are no controls on foreign exchange transactions apart from bank reporting requirements for transactions in excess of \$10,000. Importers and exporters buy and sell foreign exchange freely at commercial banks, finance companies, or exchange houses at the going market rate.²

INVESTIGATION:

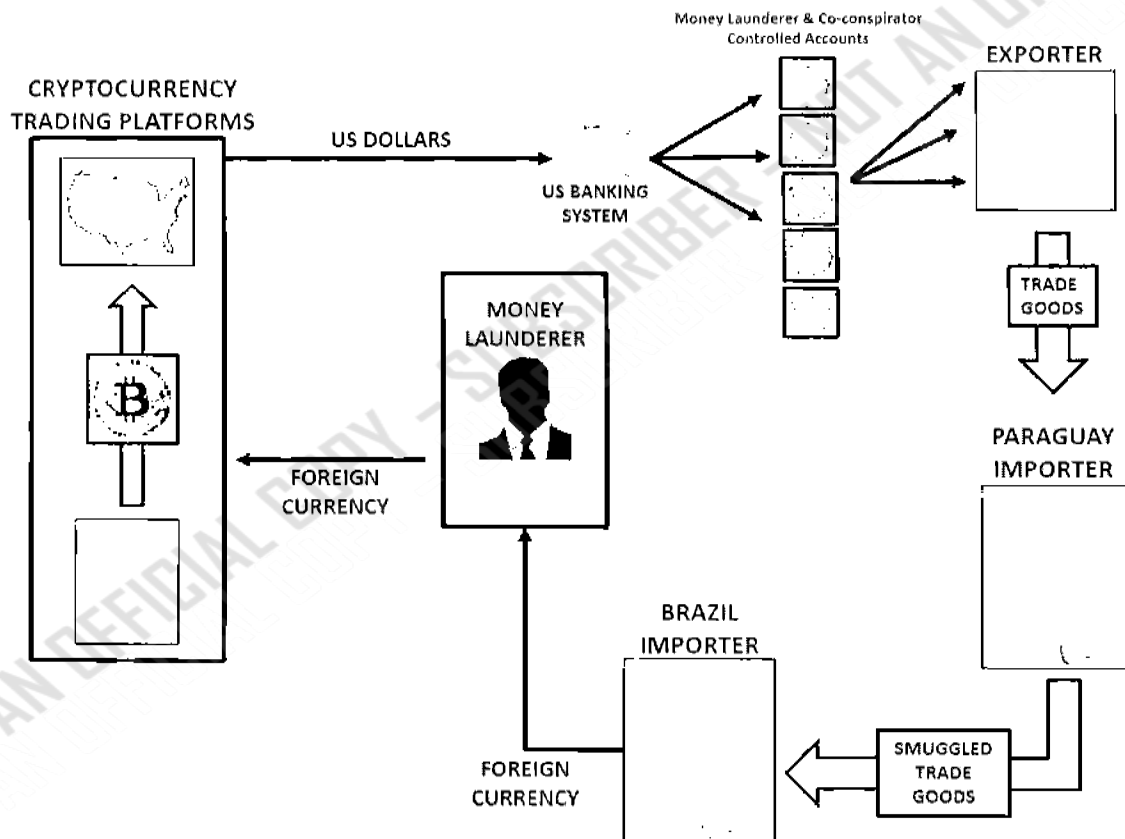
o) During the month of January 2021, your Affiant received information from a reliable law enforcement source regarding a group of businesses in South Florida that were involved in laundering large amounts of illicit funds from South

¹The excerpt was taken from the United States Department of State, Bureau for International Narcotics and Law Enforcement Affairs, International Narcotics Control Strategy Report Volume 2.

² The excerpt was taken from the United States Department of State, Bureau for International Narcotics and Law Enforcement Affairs, International Narcotics Control Strategy Report Volume 2.

America via the parallel currency market; utilizing cryptocurrency to anonymize the cross-border transfers. The funds were then used to make third party payments for various products, which is a crime under both Florida State Law and Federal Law.

p) Over the course of the investigation, your Affiant discovered an elaborate network of businesses in South Florida, mainly Broward and Miami-Dade Counties, that are laundering money through this elaborate trade-based money laundering scheme. The chart below follows the flow of money through these South Florida companies.



ENFORCEMENT #1:

q) During the initial stages of the investigation the following companies were identified as being involved in this illicit movement of funds: Make USA Corp., Virtute US Corp., Santos Moura Corp., Nelson's Cleaning Corp., and TLX Sports LLC.

r) MAKE USA CORP (hereinafter referred to as MAKE USA) is a corporation registered with Florida Department of State Division of Corporations on or about November 13, 2019. MAKE USA is located at 4324 NW 65th Terrace, Broward County, Florida. The registered agent is Juliana De Oliveira Reis.

s) VIRTUTE US CORP (Hereinafter referred to as VIRTUTE) is a corporation registered with Florida Department of State Division of Corporations on or about July 24, 2020. Virtute is located at 671 SE 18th Ave Pompano Beach, Florida. The registered agent for VIRTUTE is Juliana De Oliveira Reis. The same registered agent from Make USA Corp.

t) SANTOS MOURA CORP (Hereinafter referred to as SANTOS) is a corporation registered with Florida Department of State Division of Corporations on or about January 24, 2020. SANTOS is located at 3450 NW 85th CT. Apt. 634 Doral, Miami-Dade County, Florida. The registered agent for SANTOS is Elisangela Dos Santos Moura.

u) NELSONS CLEANING CORP (Hereinafter referred to as NELSONS) is a corporation registered with Florida Department of State Division of Corporations on or about September 9, 2019. NELSONS is located at 3450 NW 85th Ct. #634 Doral, Miami-Dade County, Florida. The registered agent for NELSONS is Elisangela Dos Santos Moura. The same registered agent from the Santos Moura Corp.

v) TLX SPORTS LLC (Hereinafter referred to as TLX) is a corporation registered with Florida Department of State Division of Corporations on or about November 13, 2012. TLX is located at 8402 NW 114th Path Doral, Miami-Dade County, Florida. The registered agents for TLX are Thiago Lacerda and Priscilla Afonso.

w) Accounts held in the name of these businesses at multiple banks were subpoenaed and reviewed. The overall pattern of activity in the respective accounts specifically evidenced the illicit activity. There was a pattern of large incoming credits from cryptocurrency trading platforms followed by wire transfers or other debits that ultimately benefitted various companies that were engaged in such businesses as import/export, and electronics. The debits to these

businesses are consistent with third party payments made by entities acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

x) For the period reviewed, from September 2020 to March 2021, over \$42 million dollars was deposited into the various accounts in question from digital cryptocurrency trading platforms. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

y) During the same period, funds were debited from the accounts, primarily by wire transfer, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics.

z) Record checks with the Department of Homeland Security revealed that MAKE USA, VIRTUTE, and TLX reportedly sent a combined total of one hundred sixty-five (165) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay.

aa) A review of the related bank accounts revealed that no direct payments had ever been received by MAKE USA, VIRTUTE, or TLX for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market.

bb) During the same period, there were funds debited from the accounts by wire transfers that benefitted Fenner Tenamac Inc. totaling over \$5 million dollars. The Department of Homeland Security seized this company's bank account(s) on August 24, 2021 for Money Laundering and Unlicensed Money Transmitter activity.

cc) The State of Florida Office of Financial Regulation provided official certified records reflecting that MAKE USA, VIRTUTE, SANTOS, NELSONS, and TLX were not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money

Transmitter/Money Service Business.

SEIZURE WARRANTS #1:

dd) On August 18, 2021, seizure warrants were signed by the Honorable Judge Stacy Ross for accounts held in the name of the above listed companies.

ee) On August 24, 2021 the seizure warrants were served by the MLTF for the TLX SPORTS LLC., MAKE USA CORP, SANTOS MOURA CORP., and NELSONS CLEANING CORP accounts. These accounts were subsequently frozen and seized.

ENFORCEMENT #2:

ff) As the investigation progressed the following additional companies were identified as being involved in this illicit movement of funds: Go-In Export Inc., NTW USA Corp., and Fox In Trading Corp.

gg) GO-IN EXPORT INC. (Hereinafter referred to as GO-IN) is a corporation registered with Florida Department of State Division of Corporations on or about October 4, 2013. GO-IN is located at 2601 NW 105th Ave. Doral, Miami-Dade County, Florida. The registered agent for GO-IN is Renato Lopes. Renato Lopes is also the owner of NTW USA Corp and Fox In Trading Corp as discussed below.

hh) NTW USA CORP. (Hereinafter referred to as NTW) is a corporation registered with Florida Department of State Division of Corporations on or about December 24, 2008. NTW is located at 2601 NW 105th Ave. Doral, Miami-Dade County, Florida. The registered agent for NTW is Renato Lopes and Rita Lopes.

ii) FOX IN TRADING CORP. (Hereinafter referred to as FOX) is a corporation registered with Florida Department of State Division of Corporations on or about October 4, 2013. FOX is located at 2601 NW 105th Ave. Doral, Miami-Dade County, Florida. The registered agents for FOX IN TRADING CORP is Renato Lopes and Rita Lopes.

jj) Accounts held in the name of these businesses at multiple banks were subpoenaed and reviewed. The overall pattern of activity in the respective accounts specifically evidenced the illicit activity. There was a pattern of large incoming credits from cryptocurrency trading platforms followed by wire transfers or other debits that ultimately benefitted various companies that were engaged in such businesses as import/export, and electronics. The debits to these businesses are consistent with third party payments made by entities acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

kk) For the period reviewed, from July 2020 to July 2021, over \$39 million dollars was deposited into the various accounts in question from digital cryptocurrency trading platforms. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

ll) During the same period, funds were debited from the accounts, primarily by wire transfer, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics.

mm) Record checks with the Department of Homeland Security revealed that GO-IN, NTW, and FOX IN reportedly sent a combined total of four hundred forty-two (442) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay.

nn) A review of the related bank accounts revealed that no direct payments had ever been received by GO-IN, NTW, or FOX IN for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market.

oo) During the same period, there were funds debited from the accounts by wire transfers that benefitted Fenner Tenamac Inc., MZ Electronics Inc., and AE Trading Inc. totaling over \$3 million dollars. The Department of

Homeland Security seized these companies' bank account(s) on August 24, 2021 for Money Laundering and Unlicensed Money Transmitter activity.

pp) The State of Florida Office of Financial Regulation provided official certified records reflecting that GO-IN, NTW, and FOX IN were not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

SEIZURE WARRANTS #2:

qq) On September 17, 2021 seizure warrants were signed by the Honorable Judge Elizabeth Scherer for accounts held in the name of GO-IN EXPORT INC, NTW USA CORP., and FOX IN TRADING CORP.

rr) On September 21, 2021 the seizure warrants were served by your Affiant for the GO-IN EXPORT INC, NTW USA CORP., and FOX IN TRADING CORP accounts. These accounts were subsequently frozen and seized.

EXPANSION OF CURRENT INVESTIGATION
COOPERATING WITNESS:

ss) In September of 2021 your Affiant met with a cooperating witness who provided his/her firsthand knowledge and involvement in the money laundering scheme outlined in this affidavit. This witness had operated several of the businesses discussed above in order to facilitate the flow of illicit funds through the related accounts.

tt) The witness identified additional persons personally known to him/her that were illegally transferring funds between the US, Paraguay, and Brazil by way of the parallel market. These funds would be transferred into the US through cryptocurrency trading platforms and be used to purchase cell phones and other consumer electronics. These goods would then be smuggled in through Paraguay and ultimately sold. The illicit proceeds would then be laundered in the same manner perpetuating the overall scheme.

uu) Melik Najm and Mohamad Najm (brothers) were specifically identified as organizing and directing this elaborate scheme. TH191 Consulting

Corp., MDGNC LLC., and Nel One Group LLC., were specifically identified as companies (discussed below) that are being used by the Najm brothers to facilitate the illegal payments and other money laundering activity.

vv) This information was corroborated by the financial transactions observed in the bank accounts that were analyzed as well as by other information gathered by your Affiant.

**LAW ENFORCEMENT INFORMATION FROM BRAZILIAN
FEDERAL POLICE:**

ww) In early 2022 your Affiant received information directly from the Brazilian Federal Police related to this investigation. According to information they received, Melik Najm was involved of the illegal sale of iPhones that were being smuggled into Brazil from Paraguay. The profits from the sale of the smuggled phones were being laundered through local cryptocurrency trading platforms in Brazil, transferred to the US, and then being introduced into the US financial system. The funds were then being layered through multiple accounts to conceal the illicit source of the funds, purchase additional trade goods (to be smuggled), and to promote the overall illegal activity.

xx) The Brazilian Federal Police also advised that in addition to the profits from smuggled consumer electronics; Melik Najm was believed to be laundering funds derived from public corruption and narcotics trafficking in Brazil.

ENFORCEMENT #3:

yy) TH191 Consulting Corp. (Hereinafter referred to as TH191) is a corporation registered with Florida Department of State Division of Corporations on or about September 28, 2012. TH191 is located at 589 E Sample Rd. Pompano Beach, Broward County, Florida. This is the physical address of USA Tax Corporation, which is owned by Marco Reis. Marco Reis is married to Juliana De Oliveira Reis who is associated with MAKE USA and VIRTUTE. These companies' accounts were previously seized in this investigation by the MLTF as discussed above. The registered agent for TH191 is Melik Najm.

zz) Account #9146648251 held at Citibank was opened in the name of TH191 Consulting Corp. on or about August 23, 2019.

aaa) Your Affiant subpoenaed and reviewed the Citibank account for TH191 Consulting Corp; specifically account #9146648251 and found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes.

bbb) Account #762293352 held at JP Morgan Chase was opened in the name of TH191 Consulting Corp. on or about June 17, 2021.

ccc) Your Affiant subpoenaed and reviewed the JP Morgan Chase account for TH191 Consulting Corp; specifically account #762293352 and found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes.

ddd) For the limited purposes of this affidavit, your Affiant reviewed records for the TH191 accounts covering the period from April 2021 through April 2022.

eee) For the period reviewed, from April 2021 to April 2022, the sources of the funds deposited into the TH191 accounts included close to \$4 million dollars credited from OSL SG PTE LTD and OSL Digital Limited, which are digital cryptocurrency trading platforms. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

fff) During the same period over \$3.5 million dollars was credited from Virtute US Corp. and over \$1 million dollars was credited from Make USA Corp to the TH191 accounts. The MLTF seized these companies' bank account(s) on August 24, 2021, for Money Laundering and Unlicensed Money Transmitter Activity.

ggg) For the period reviewed, funds were debited from the TH191 accounts, primarily by wire transfer, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. These debits totaled over \$6 million dollars.

hhh) On June 2, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that both TH191 Consulting Corp. and Melik Najm are not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

iii) MDGNC LLC. (Hereinafter referred to as MDGNC) is a corporation registered with Florida Department of State Division of Corporations on or about April 24, 2019. MDGNC is located at 587 E Sample Rd. Pompano Beach, Broward County, Florida. This is the physical address of USA Tax Corporation, which is owned by Marco Reis. Marco Reis is married to Juliana De Oliveira Reis who is associated with MAKE USA and VIRTUTE. These companies' accounts were previously seized in this investigation by the MLTF as discussed above. The registered agent for MDGNC is Melik Najm.

jjj) Account #9146648329 held at Citibank was opened in the name of MDGNC LLC on or about August 23, 2019.

kkk) Your Affiant subpoenaed and reviewed the Citibank account for MDGNC; specifically account #9146648329 and found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes.

lll) Account #762312285 held at JP Morgan Chase was opened in the name of MDGNC LLC on or about August 17, 2021.

mmm) Your Affiant subpoenaed and reviewed the JP Morgan Chase account for MDGNC LLC; specifically account #762312285 and found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes.

nnn) For the limited purposes of this affidavit, your Affiant reviewed records for the MDGNC accounts covering the period from April 2021 through April 2022.

ooo) For the period reviewed, from April 2021 to April 2022, the sources of the funds deposited into the MDGNC accounts included close to \$32

million dollars credited from OSL SG PTE LTD and OSL Digital Limited, which are digital cryptocurrency trading platforms. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

ppp) During the same period \$119,000 dollars was credited from Virtute US Corp. The MLTF seized this company's bank account(s) on August 24, 2021, for Money Laundering and Unlicensed Money Transmitter Activity.

qqq) During the same period over \$4.8 million dollars was transferred from the TH191 Citibank account #9146648251.

rrr) For the period reviewed, funds were debited from the MDGNC accounts, primarily by wire transfer, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. These debits totaled over \$35 million dollars. The wire transfers to these businesses are consistent with third party payments made by an entity (MDGNC LLC) that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

sss) On June 2, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that both MDGNC LLC and Melik Najm are not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

ttt) Nel One Group LLC. (Hereinafter referred to as NEL ONE) is a corporation registered with Florida Department of State Division of Corporations on or about July 25, 2016. NEL ONE is located at 8216 NW 30th Terrace, Doral, Dade County, Florida. When NEL ONE was initially incorporated the listed address was 591 E. Sample Rd. Pompano Beach, Broward County, Florida. This is the physical address of USA Tax Corporation, which is owned by Marco Reis. Marco Reis is married to Juliana De Oliveira Reis who is associated with MAKE USA and VIRTUTE. These companies' accounts were previously seized in this investigation by the MLTF as discussed above. The registered agent for NEL ONE is Mohamad

Najm, brother of Melik Najm.

uuu) Account #0306290582 held at Regions Bank was opened in the name of NEL ONE GROUP LLC on or about November 23, 2020.

vvv) Your Affiant subpoenaed and reviewed the Regions Bank account for NEL ONE; specifically account #0306290582 and found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes.

www) Account #4377657875 held at TD Bank was opened in the name of NEL ONE GROUP LLC on or about October 9, 2020.

xxx) Your Affiant subpoenaed and reviewed the TD Bank account for NEL ONE; specifically account #4377657875 and found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes.

yyy) Account #31104173 held at Amerasia Bank was opened in the name of NEL ONE GROUP LLC on or about August 3, 2021.

zzz) Your Affiant subpoenaed and reviewed the Amerasia Bank account for NEL ONE; specifically account #31104173 and found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes.

aaaa) Account #9064103413 held at First Citizens Bank was opened in the name of NEL ONE GROUP LLC on or about January 6, 2022.

bbbb) Your Affiant subpoenaed and reviewed the First Citizens Bank account for NEL ONE; specifically account #9064103413 and found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes.

cccc) For the limited purposes of this affidavit, your Affiant reviewed records for the NEL ONE accounts covering the period from November 2021 through May 2022.

dddd) For the period reviewed, from November 2021 to May 2022, the sources of the funds deposited into the NEL ONE accounts included more than

\$70 million dollars credited from Paxos Trust Company LLC, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

eeee) For the period reviewed, funds were debited from the NEL ONE accounts, primarily by wire transfer, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. These debits totaled over \$70 million dollars, over \$11 million by check and over \$59 million by wire transfer. The payments to these businesses are consistent with third party payments made by an entity (NEL ONE GROUP LLC) that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

ffff) Record checks with the Department of Homeland Security revealed that NEL ONE reportedly sent a combined total of one hundred eighty-eight (188) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay.

gggg) A review of the related bank accounts revealed that no direct payments had ever been received by NEL ONE for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market.

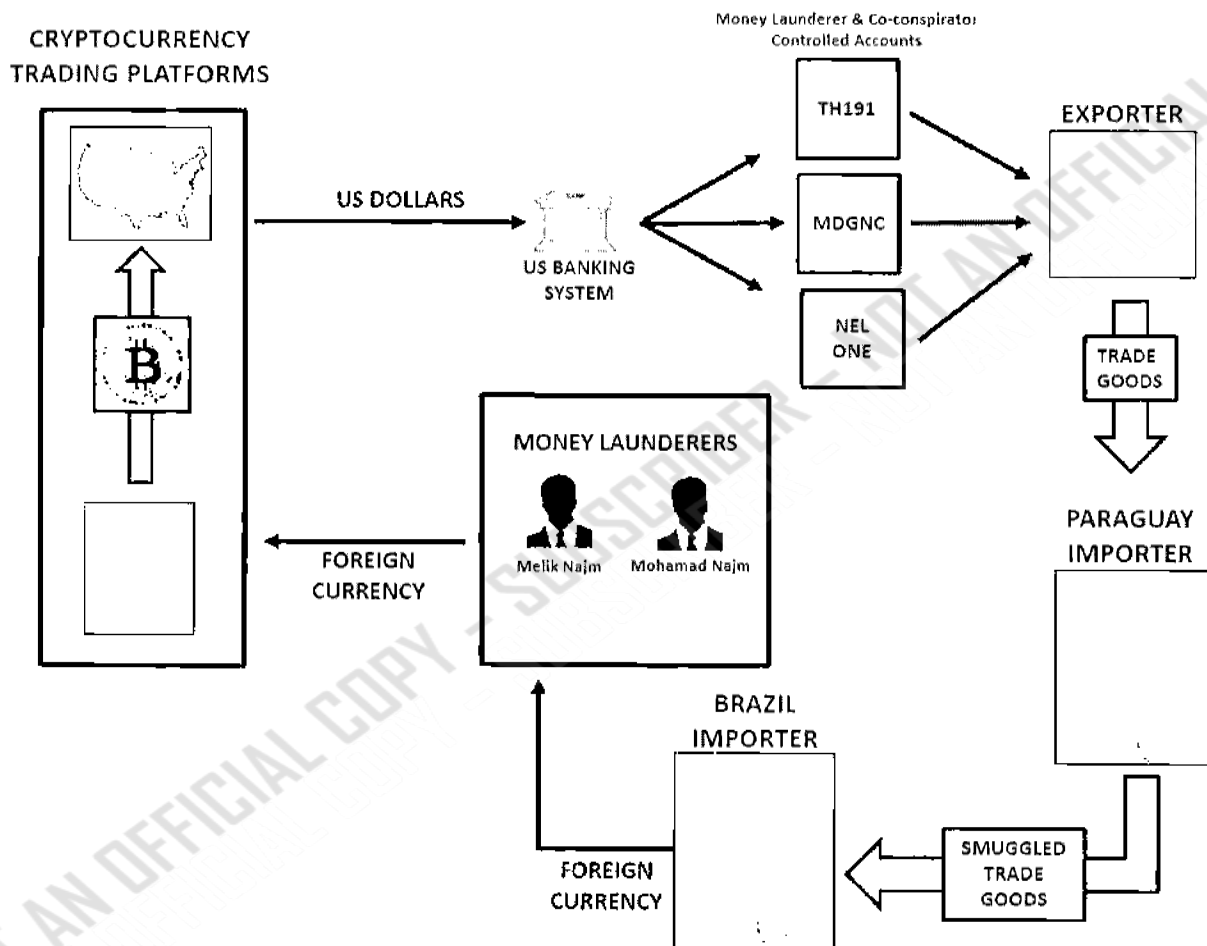
hhhh) On June 2, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that both NEL ONE and Mohamad Najm are not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

SEIZURE WARRANTS #3:

iiii) On June 10, 2022 seizure warrants were signed by the Honorable Judge Michael Lynch for accounts held in the name of TH191 CONSULTING CORP,

MDGNC LLC, and NEL ONE GROUP LLC.

jjjj) On June 14, 2022 the seizure warrants were served by your Affiant for the TH191 CONSULTING CORP, MDGNC LLC, and NEL ONE GROUP LLC accounts. These accounts were subsequently frozen and seized.



CURRENT INVESTIGATION

kkkk) In June 2022, your Affiant subpoenaed bank account records for multiple digital cryptocurrency trading platforms held at Silvergate Bank. The records included those for accounts held in the name of OSL Digital LTD, OSL SG PTE LTD, Paxos Global PTE LTD, and Paxos Trust Company LLC. In these records were the wire transfer payment details from the various operating accounts which

represented the funds being transferred off the respective cryptocurrency trading platforms and into the US financial system.

III) Your Affiant examined the records produced by Silvergate Bank and found the following:

- i. During the period of September 2021 to June 2022 ten companies had transferred a total of over \$425 million dollars off these cryptocurrency trading platforms into accounts held at different US banks.
- ii. The accounts of these ten companies were receiving funds in the same pattern as those previously identified and seized (discussed above) by the MLTF for being used to facilitate the laundering of illicit funds.
- iii. In addition to the transaction pattern of these ten companies being consistent with those previously identified as being used to facilitate money laundering, your Affiant noted that the transaction patterns of these ten companies were not consistent with the transaction patterns of thousands of other persons and businesses using the same digital cryptocurrency trading platforms contained in the same records.

mmmm) The ten companies identified by your Affiant were as follows:

- 1) Amazing Import & Export Corp – February 2022 to June 2022
\$26,564,292.87.
- 2) Cell World Electronics Corp. – for the month of June 2022
\$4,942,293.10.
- 3) Delta Machine Trading Corp. – December 2021 to June 2022
\$94,743,644.08.
- 4) JOV Global Trading Corp. – for the month of June 2022
\$18,895,251.38.
- 5) M4M Import & Export Corp – January 2022 to June 2022
\$70,076,815.04.

- 6) MMV Trading Corp. – February 2022 to June 2022 \$16,925,385.83.
- 7) T6P Tech Corp – February 2022 to June 2022 \$47,439,448.53.
- 8) Vepla Trading & Logistics LLC – February 2021 to June 2022 \$22,462,503.00.
- 9) GF Trading Solutions Corp. – September 2021 to June 2022 \$25,840,689.61.
- 10) WWB Ventures LLC – June 2021 to June 2022 \$97,733,683.21.

nnnn) In general, these companies all appeared to be shell companies, recently formed, with multiple things in common such as address, corporate officers, and other details that evidenced that these companies while appearing on the surface to be unrelated were in fact related and engaged in a common money laundering scheme. The specific details of each company is outlined below, however of particular note were connections your Affiant identified between the ten companies and Abboud Trading, the Najm brothers, and other targets of the Brazilian federal investigation.

oooo) Abboud Trading Corp. (hereinafter referred to as ABBOUD) is a corporation registered with the Florida Department of State Division of Corporations on or about November 13, 1996. The corporate officers for ABBOUD are brothers Roger Abboud and Ghassan Abboud. They are also both listed as the corporate officers for 17121 Jade Ocean Condo LLC. According to the Miami-Dade County Property Appraiser, this company is the owner of a condominium located at 17121 Collins Ave Unit 2407 Sunny Isles Beach, FL 33160 (hereinafter referred to as the SUNNY ISLES CONDO). It should be noted that a records check with the Department of Homeland Security revealed that Melik Najm, a Brazilian citizen, lists the SUNNY ISLES CONDO as his temporary residence when visiting the United States. This address is a small one-bedroom condominium in Sunny Isles.

pppp) Based on financial records and information received from other law enforcement sources, your Affiant knows that ABBOUD, and the Abboud brothers, are involved in the purchase of consumer electronics in the US,

the export of those electronics to Paraguay, as well as the ultimate resale of those goods in Paraguay and other jurisdictions.

qqqq) This is consistent with the scheme outlined above where businesses are being used to illegally transfer funds between the US, Paraguay, and Brazil by way of the parallel market. These funds are then transferred into the US through cryptocurrency trading platforms and used to purchase cell phones and other consumer electronics. These goods would be smuggled in through Paraguay and ultimately sold. The illicit proceeds are then being laundered in the same manner perpetuating the overall scheme.

AMAZING IMPORT & EXPORT CORP.

rrrr) Amazing Import & Export Corp (hereinafter referred to as AMAZING IMPORT) is a corporation registered with the Florida Department of State Division of Corporations on or about November 21, 2021.

- i. According to the State, AMAZING IMPORT is located at 1549 NE 123rd ST North Miami, FL 33161. MMV Trading Corp and M4M Import & Export Corp are also listed with the State as being located at this address.
- ii. The corporate officers for AMAZING IMPORT are Jair Aparecido Gerolin (discussed above as a target of the Brazilian Federal investigation) and Marcelo Marins Rodrigues. They are also both listed as the corporate officers for M4M Import & Export Corp.
- iii. According to bank documents, the address for AMAZING IMPORT and/or the business's corporate officers is the SUNNY ISLES CONDO that is owned by Abboud Trading Corp.'s Roger Abboud and Ghassan Abboud. This is the same one bedroom beach condominium that Melik Najm lists as his local address when he travels to the United States. It is also listed with various banks as the corporate address for T6P TECH, CELL WORLD, DELTA MACHINE TRADING CORP., and M4M IMPORTS.

ssss) Your Affiant identified two accounts for AMAZING IMPORT;

specifically account #3290420905 held at Citibank and account #817796011 held at JP Morgan Chase. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to these accounts.

tttt) From February 2022 to June 2022, the sources of the funds deposited into the AMAZING IMPORT accounts included over \$26.5 million dollars credited from OSL Digital Limited, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

uuuu) Record checks with the Department of Homeland Security revealed that between March and July 2022, AMAZING IMPORT sent a total of fourteen (14) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay. These shipments were reportedly valued at a total of just over \$2 million dollars.

vvvv) A review of the available related financial information revealed no direct payments received by AMAZING IMPORT for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market. The approximate \$24 million dollar discrepancy between the amounts received from OSL by AMAZING IMPORT and the reported outgoing shipments your Affiant believes can be explained by the layering of third party payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these businesses are consistent with third party payments made by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

wwww) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that AMAZING IMPORT is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money

Transmitter/Money Service Business.

CELL WORLD ELECTRONICS CORP.

xxxx) Cell World Electronics Corp (hereinafter referred to as CELL WORLD) is a corporation registered with the Florida Department of State Division of Corporations on or about March 1, 2022.

- i. According to the State, CELL WORLD is located at 15805 Biscayne Blvd Suite 201 Aventura, FL 33160. GF Trading Solutions Corp and WWB Ventures LLC are also listed with the State as being located at this address.
- ii. The corporate officer for CELL WORLD is Guilherme Augusto Viel. He is also listed as the corporate officer for Delta Machine Trading Corp. Guilherme's brother, Joao Vitor Viel, is listed as the corporate officer for JOV Global Trading Corp.
- iii. According to bank documents, the address for CELL WORLD and/or the business's corporate officer is the SUNNY ISLES CONDO that is owned by Abboud Trading Corp.'s Roger Abboud and Ghassan Abboud. This is the same one bedroom beach condominium that Melik Najm lists as his local address when he travels to the United States. It is also listed as the corporate address for T6P TECH, CELL WORLD, DELTA MACHINE TRADING CORP., and M4M IMPORTS.

yyyy) Your Affiant identified four accounts for CELL WORLD; specifically account #898133069502 held at Bank of America, account #9118972795 held at Citibank, account #817796011 held at JP Morgan Chase, and account #1100019408432 held at Truist Financial. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to these accounts.

zzzz) During the month of June 2022 the sources of the funds deposited into the CELL WORLD accounts included over \$4.9 million dollars

credited from OSL Digital Limited, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

aaaaa) Record checks with the Department of Homeland Security revealed that between June and July 2022, CELL WORLD sent a total of five (5) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay. These shipments were reportedly valued at a total of just over \$4.5 million dollars.

bbbbb) A review of the available related financial information revealed no direct payments received by CELL WORLD for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market.

ccccc) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that CELL WORLD is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

DELTA MACHINE TRADING CORP.

dddddd) Delta Machine Trading Corp (hereinafter referred to as DELTA) is a corporation registered with the Florida Department of State Division of Corporations on or about November 3, 2021.

- i. According to the State, DELTA is located at 409 NW 10th Terrace Hallandale Beach, FL 33009.
- ii. The corporate officer for DELTA is Guilherme Augusto Viel. He is also listed as the corporate officer for Cell World Electronics Corp. Guilherme's brother, Joao Vitor Viel, is the corporate officer for JOV Global Trading Corp.
- iii. According to bank documents, the address for DELTA and/or the

business's corporate officer is the SUNNY ISLES CONDO that is owned by Abboud Trading Corp.'s Roger Abboud and Ghassan Abboud. This is also the same address used by Melik Najm when he travels to the United States. It is also listed as the corporate address for T6P TECH, AMAZING IMPORT, CELL WORLD, and M4M IMPORTS.

eeee) Your Affiant identified two accounts for DELTA; specifically account #3290420536 held at Citibank and account #787502811 held at JP Morgan Chase. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to these accounts.

ffff) From December 2021 to June 2022 the sources of the funds deposited into the DELTA accounts included over \$94.7 million dollars credited from OSL Digital Limited, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

gggg) Record checks with the Department of Homeland Security revealed that between January and July 2022, DELTA sent a total of two hundred ninety-nine (299) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay. These shipments were reportedly valued at a total of just over \$12 million dollars.

hhhh) A review of the available related financial information revealed no direct payments received by DELTA for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market. The approximate \$82 million dollar discrepancy between the amounts received from OSL by DELTA and the reported outgoing shipments your Affiant believes can be explained by the layering of third-party payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these

businesses are consistent with third party payments made by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

iiii) A review of financial intelligence information related to DELTA revealed that the company was involved in a pattern of suspicious financial transactions linked to trade-based money laundering activity and the layering of illicit funds. These transactions also involved/were related to multiple other businesses including ABOUD and T6P Tech Corp.

jjjj) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that DELTA is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

JOV GLOBAL TRADING CORP.

kkkk) JOV Global Trading Corp (hereinafter referred to as JOV) is a corporation registered with the Florida Department of State Division of Corporations on or about January 26, 2022.

- i. According to the State, JOV is located at 22735 SW 66th Avenue Suite 206 Boca Raton, FL 33428. This is a residential condo/apartment building.
- ii. The corporate officer for JOV is Joao Vitor Viel. Joao's brother, Guilherme Augusto Viel, is the corporate officer for CELL WORLD and DELTA.

llll) Your Affiant identified three accounts for JOV; specifically account #898101667567 held at Bank of America, account #9117742939 held at Citibank, and account #825016816 held at JP Morgan Chase. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to these accounts.

mmmm) During the month of June 2022, the sources of the funds deposited into the JOV accounts included over \$18.8 million dollars credited from

OSL Digital Limited, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

nnnnn) Record checks with the Department of Homeland Security revealed that between May and July 2022, JOV sent a total of ten (10) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay. These shipments were reportedly valued at a total of just over \$3 million dollars.

ooooo) A review of the available related financial information revealed no direct payments received by JOV for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market. The approximate \$15 million dollar discrepancy between the amounts received from OSL by JOV and the reported outgoing shipments your Affiant believes can be explained by the layering of third-party payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these businesses are consistent with third party payments made by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

ppppp) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that JOV is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

M4M IMPORT & EXPORT CORP.

qqqqq) M4M Import & Export Corp (hereinafter referred to as M4M IMPORT) is a corporation registered with the Florida Department of State Division of Corporations on or about November 12, 2021.

i. According to the State, M4M IMPORT is located at 1549 NE 123rd ST

North Miami, FL 33161. MMV Trading Corp and AMAZING IMPORT are also listed with the State as being located at this address.

- ii. The corporate officers for M4M IMPORT are Jair Aparecido Gerolin (discussed above as a target of the Brazilian Federal investigation) and Marcelo Marins Rodrigues. They are also both listed as the corporate officers for AMAZING IMPORT.
- iii. According to bank documents, the address for M4M IMPORT and/or the business's corporate officers is the SUNNY ISLES CONDO that is owned by Abboud Trading Corp.'s Roger Abboud and Ghassan Abboud. This is the same one bedroom beach condominium that Melik Najm lists as his local address when he travels to the United States. It is also listed as the corporate address for T6P TECH, AMAZING IMPORT, CELL WORLD, and DELTA MACHINE TRADING CORP.

rrrrr) Your Affiant identified two accounts for M4M IMPORT; specifically account #3290417620 held at Citibank and account #788657630 held at JP Morgan Chase. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to these accounts.

sssss) From January 2022 to June 2022 the sources of the funds deposited into the M4M IMPORT accounts included over \$70 million dollars credited from OSL Digital Limited, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

ttttt) Record checks with the Department of Homeland Security revealed that between February and July 2022, M4M IMPORT sent a total of forty (40) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay. These shipments were reportedly valued at a total of just over \$7.5 million dollars.

uuuuu) A review of the available related financial information

revealed no direct payments received by M4M IMPORT for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market. The approximate \$63 million dollar discrepancy between the amounts received from OSL by M4M IMPORT and the reported outgoing shipments your Affiant believes can be explained by the layering of third-party payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these businesses are consistent with third party payments made by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

vvvvv) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that M4M IMPORT is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

MMV TRADING CORP.

wwwww) MMV Trading Corp (hereinafter referred to as MMV TRADING) is a corporation registered with the Florida Department of State Division of Corporations on or about November 5, 2021.

- i. According to the State, MMV TRADING is located at 1549 NE 123rd ST North Miami, FL 33161. M4M IMPORT and AMAZING IMPORT are also listed with the State as being located at this address.
- ii. The corporate officer for MMV TRADING is Murilo Borges Verdi.

xxxxx) Your Affiant identified three accounts for MMV TRADING; specifically account #898130238705 held at Bank of America, account #9116039834 held at Citibank, and account #795365755 held at JP Morgan Chase. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to these accounts.

yyyyy) From February 2022 to June 2022 the sources of the funds deposited into the MMV TRADING accounts included over \$16.9 million dollars credited from OSL Digital Limited, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

zzzzz) Record checks with the Department of Homeland Security revealed no records of exports by MMV TRADING.

aaaaa)The discrepancy between the amounts received from OSL by MMV TRADING and the lack of reported exports is consistent with MMV TRADING being used to layer, and further conceal the original source, of funds used for third party payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these businesses are consistent with third party payments made by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

bbbbbb)On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that MMV TRADING is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

T6P TECH CORP.

cccccc) T6P Tech Corp (hereinafter referred to as T6P TECH) is a corporation registered with the Florida Department of State Division of Corporations on or about December 10, 2021.

- i. According to the State, JOV is located at 1395 Brickell Ave Suite 852 Miami, FL 33131. This is a residential condo/apartment building.
- ii. The corporate officer for T6P Tech is Thiago Pinheiro Pereira.
- iii. According to bank documents, the address for T6P Tech Corp

and/or the business's corporate officer is the SUNNY ISLES CONDO that is owned by Abboud Trading Corp.'s Roger Abboud and Ghassan Abboud. This is the same one bedroom beach condominium that Melik Najm lists as his local address when he travels to the United States. It is also listed as the corporate address for AMAZING IMPORT, CELL WORLD, DELTA MACHINE TRADING CORP., AND M4M IMPORTS.

dddddd) Your Affiant identified two accounts for T6P TECH; specifically account #3290427173 held at Citibank and account #795288635 held at JP Morgan Chase. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to these accounts.

eeeeee) From February 2022 to June 2022, the sources of the funds deposited into the T6P TECH accounts included over \$47.4 million dollars credited from OSL Digital Limited, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

fffff) Record checks with the Department of Homeland Security revealed no records of exports by T6P TECH.

gggggg) The discrepancy between the amounts received from OSL by T6P TECH and the lack of reported exports is consistent with T6P TECH being used to layer, and further conceal the original source, of funds used for third party payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these businesses are consistent with third party payments made by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

hhhhh) A review of financial intelligence information related to T6P TECH revealed that the company was involved in a pattern of suspicious financial transactions linked to trade-based money laundering activity and the layering of

illicit funds. These transactions also involved/were related to multiple other businesses including ABBOUD and DELTA.

iiiiii) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that T6P TECH is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

VEPLA TRADING & LOGISTICS LLC

jjjjjj) Vepla Trading & Logistics LLC (hereinafter referred to as VEPLA) is a corporation registered with the Florida Department of State Division of Corporations on or about October 7, 2020. According to the State VEPLA is located at 1157 NW 159 Dr Miami, FL 33169. The corporate officers for VEPLA is Jose Malave and Marco Malave.

kkkkkk) Your Affiant identified two accounts for VEPLA; specifically account #898114129597 held at Bank of America and account #0322343970 held at Regions Bank. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to these accounts.

llllll) From February 2021 to June 2022, the sources of the funds deposited into the AMAZING IMPORT accounts included over \$22.4 million dollars credited from OSL SG PTE LTD and OSL Digital Limited, which are digital cryptocurrency trading platforms. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

mmmmmm) Record checks with the Department of Homeland Security revealed no records of exports by VEPLA.

nnnnnn) The discrepancy between the amounts received from OSL by VEPLA and the lack of reported exports is consistent with VEPLA being used to layer, and further conceal the original source, of funds used for third party

payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these businesses are consistent with third party payments made by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

ooooo) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that VEPLA is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

GF TRADING SOLUTIONS CORP.

ppppp) GF Trading Solutions Corp (hereinafter referred to as GF TRADING) is a corporation registered with the Florida Department of State Division of Corporations on or about December 23, 2020.

- i. According to the State, GF TRADING is located at 15805 Biscayne Blvd Suite 201 Aventura, FL 33160. CELL WORLD and WWB Ventures LLC are also listed with the State as being located at this address.
- ii. The corporate officer for GF TRADING is Rodrigo Jorge Silva Vittori. He is also listed as the corporate officer for WWB Ventures LLC.

qqqqq) Your Affiant identified one open account for GF TRADING; specifically account #9117744953 held at Citibank. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to this account.

rrrrr) From September 2021 to June 2022, the sources of the funds deposited into the GF TRADING accounts included over \$25.8 million dollars credited from Paxos Trust Company LLC, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

sssss) Record checks with the Department of Homeland Security revealed that between September 2021 and June 2022, GF TRADING sent a total of eleven (11) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay. These shipments were reportedly valued at a total of just over \$1.8 million dollars.

ttttt) A review of the available related financial information revealed no direct payments received by GF TRADING for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market. The approximate \$24 million dollar discrepancy between the amounts received from Paxos by GF TRADING and the reported outgoing shipments your Affiant believes can be explained by the layering of third-party payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these businesses are consistent with third party payments made by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

uuuuu) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that GF TRADING is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

WWB VENTURES LLC

vvvvv) WWB Ventures LLC (hereinafter referred to as WWB VENTURES) is a corporation registered with the Florida Department of State Division of Corporations on or about May 10, 2013. Based on corporate filings ownership/control of the business was acquired by Rodrigo Jorge Silva Vittori in February of 2021. At this time the corporate filing were amended to change the registered agent, corporate officer, and the listed addresses.

- i. According to the State, WWB VENTURES is located at 15805 Biscayne Blvd Suite 201 Aventura, FL 33160. CELL WORLD and GF TRADING are also listed with the State as being located at this address.
- ii. The corporate officer for WWB VENTURES is Rodrigo Jorge Silva Vittori. He is also listed as the corporate officer for GF TRADING.

wwwww) Your Affiant identified one account for WWB VENTURES; specifically account #9116035757 held at Citibank. Your Affiant found evidence of felony violations of §896.101 (Money Laundering), and §560.125 (Unlawful Money Transmitter), Florida Statutes related to this account.

xxxxxx) From June 2021 to June 2022, the sources of the funds deposited into the WWB VENTURES accounts included over \$97.7 million dollars credited from Paxos Trust Company LLC, which is a digital cryptocurrency trading platform. These platforms are useful in money laundering as they mask the source of the funds, making the international movement of funds difficult to trace.

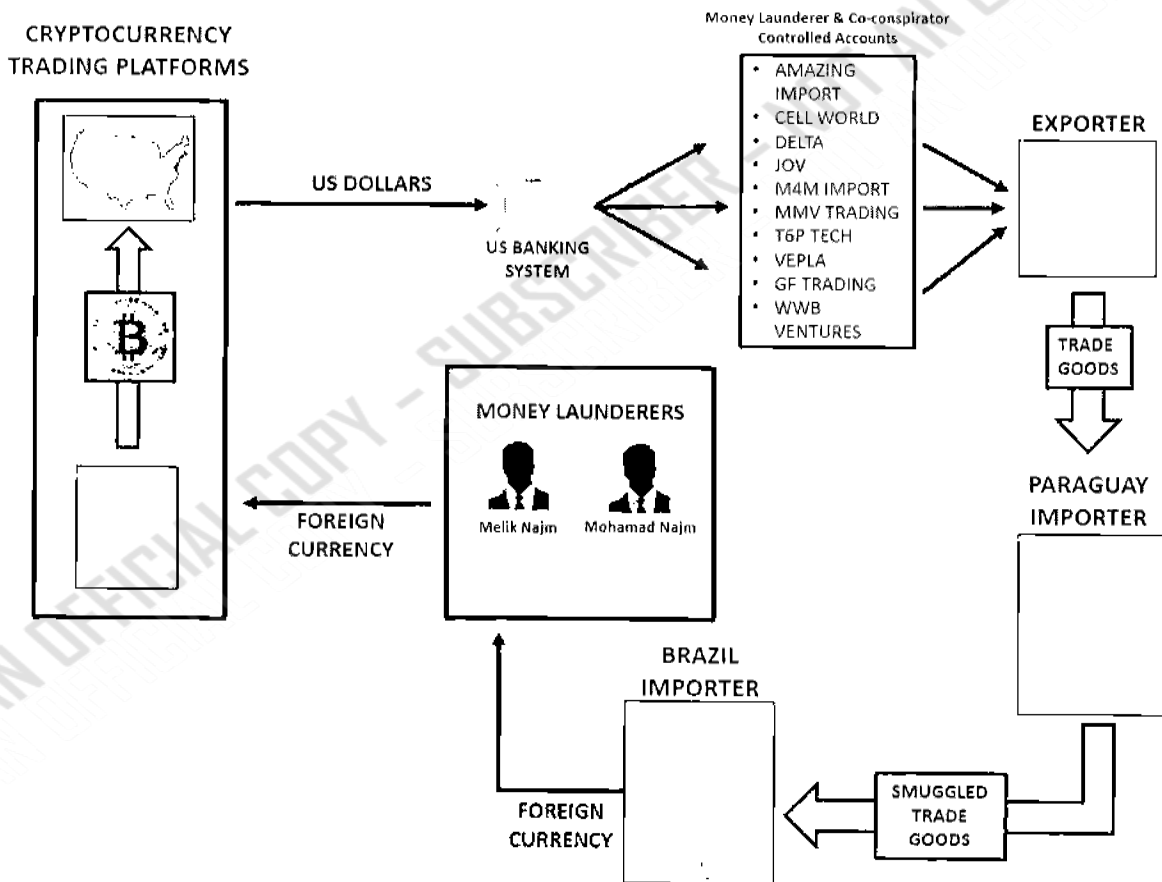
yyyyyy) Record checks with the Department of Homeland Security revealed that between September 2021 and July 2022, WWB VENTURES sent a total of ninety-five (95) shipments of consumer electronics to various consignees in Ciudad del Este, Paraguay and one (1) shipment to a consignee in Brazil. These shipments were reportedly valued at a total of just over \$9 million dollars.

zzzzzz) A review of the available related financial information revealed no direct payments received by WWB VENTURES for any of those shipments. Your Affiant knows that this lack of payment for outgoing shipments indicates participation in trade-based money laundering utilizing the parallel currency market. The approximate \$88 million dollar discrepancy between the amounts received from Paxos by WWB VENTURES and the reported outgoing shipments your Affiant believes can be explained by the layering of third-party payments, benefitting various companies that were engaged in such business as import/export, the sale of cellphones, and the sale of other consumer electronics. The payments to these businesses are consistent with third party payments made

by an entity that is acting as a Money Service Business, while operating in concert with a broker in the parallel currency market.

aaaaaaa) On July 18, 2022, your Affiant contacted the State of Florida Office of Financial Regulation and obtained official certified records reflecting that WWB VENTURES is not licensed by the State of Florida under the provisions of Chapter 560, Florida Statutes to do business in the State of Florida as a Money Transmitter/Money Service Business.

CONCLUSION



bbbbbbb) Based on the above-described activity relating to AMAZING IMPORT, CELL WORLD, DELTA, JOV, M4M IMPORT, MMV TRADING, T6P TECH, VEPLA, GF TRADING, and WWB VENTURES your Affiant has concluded the

following:

ccccccc) AMAZING IMPORT, CELL WORLD, DELTA, JOV, M4M IMPORT, MMV TRADING, T6P TECH, VEPLA, GF TRADING, and WWB VENTURES are not licensed by the State of Florida to conduct business as a Money Transmitter/Money Service Business.

ddddddd) The pattern of activity present in the accounts in the name of AMAZING IMPORT, CELL WORLD, DELTA, JOV, M4M IMPORT, MMV TRADING, T6P TECH, VEPLA, GF TRADING, and WWB VENTURES is consistent with an entity engaging in the business of a Money Service Business and conducting funds transmissions while working in concert with a broker in the parallel currency market. The funds being moved through the accounts were transferred into the US through cryptocurrency trading platforms and then used to purchase consumer electronics to be smuggled in through Paraguay and ultimately sold. The illicit proceeds were then cycled back and laundered through the accounts in the same manner continuing the overall scheme.

eeeeeee) Based upon the foregoing, your Affiant has probable cause to believe, and does believe, that accounts in the name of Cell World Electronics, Corp., JOV Global Trading, Corp., MMV Trading & Logistics, LLC, Amazing Import & Export, Corp., Delta Machine Trading, Corp., M4M IMPORT & Export, Corp., T6P Tech Corp., GF Trading Solutions, Corp., and WWB Ventures, LLC. have been used to commit felony violations of Florida Statutes §896.101, Florida Money Laundering Act by an entity engaged in the business of a Money Service Business without a license §560.125.

ffffff) The Florida Contraband Forfeiture Act prohibits the possession of any contraband article, and that a contraband article includes any personal property, including funds, currency, or negotiable instruments, which were used or attempted to be used as an instrumentality in the commission of, or in aiding and abetting in the commission of, any felony, or acquired by proceeds obtained as a result thereof, and subjects such property to seizure and forfeiture. Section 932.701 et seq., Florida Statutes (2022).

ggggggg) The **Bank of America account #898133069502, Bank of America account #898101667567, Bank of America account #898130238705, Bank of America account #898114129597, Citibank account #3290420905, Citibank account #9118972795, Citibank account #3290420536, Citibank account #9117742939, Citibank account #3290417620, Citibank account #9116039834, Citibank account #3290427173, Citibank account #9117744953, Citibank account #9116035757, JP Morgan Chase account #817796011, JP Morgan Chase account #837618971, JP Morgan Chase account #787502811, JP Morgan Chase account #825016816, JP Morgan Chase account #788657630, JP Morgan Chase account #795365755, JP Morgan Chase account #795288625, Regions Bank account #0322343970, and Truist Financial account #1100019408432** have been identified, analyzed, investigated, and are being utilized to introduce parallel market dollars into the banking system, whereby the illicit dollars are then attempted to be converted, disguised and layered through the accounts controlled by **AMAZING IMPORT & EXPORT CORP., CELL WORLD ELECTRONICS CORP., DELTA MACHINE TRADING CORP., JOV GLOBAL TRADING CORP., M4M IMPORT & EXPORT CORP., MMV TRADING CORP., T6P TECH CORP., VEPLA TRADING & LOGISTICS LLC, GF TRADING SOLUTIONS CORP., and WWB VENTURES LLC.**

7. Based on the totality of the circumstances, **\$2,048,229.48** was seized for forfeiture pursuant to the Florida Contraband Forfeiture Act as there is probable cause to believe that the Seized Property has become and is a "Contraband Article" as that term is defined in §932.701(2)(a)5., subject to seizure and forfeiture pursuant to §932.701 et seq., the Florida Contraband Forfeiture Act, the totality of the circumstances being such to establish that Seized Property was used, or was attempted to be used as in instrumentality in the commission of, or in aiding or abetting in the commission of, a felony, to wit:

- a. Money Service Business offenses in violation of Florida Statute §560.111(1)(c), by knowingly making false entries in money service business books, accounts, reports, files, or documents with intent to deceive or defraud another person, or with intent to deceive the State of Florida Office of Financial Regulation (hereinafter "Office"), any appropriate regulator, or

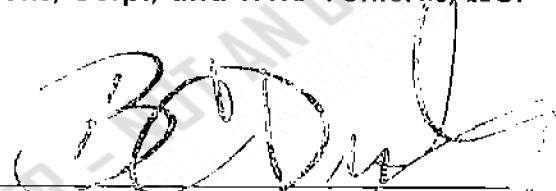
any authorized third party appointed by the Office to investigate the affairs of the money service business, a third degree felony;

- b. Money Service Business offenses in violation of Florida Statute §560.111(1)(d), by knowingly engaging in acts that violate 18 U.S.C. §1956 (Money Laundering); 18 U.S.C. §1957 (Engaging in Financial Transactions Involving Criminally Derived Property); 18 U.S.C. §1960 (Transportation/Transmission of Criminally Derived Funds); and, 31 U.S.C. §5324 (File False Currency Transaction Reports), a third degree felony;
- c. Money Service Business offenses in violation of Florida Statute §560.123(3), by willfully failing to keep an accurate record of each financial transaction occurring in this state which the money service business knows to involve currency or other payment instrument having a value greater than \$10,000, and such violation involves currency or payment instruments in excess of \$100,000 in a 12-month period, a first degree felony;
- d. Money Service Business offenses in violation of Florida Statute §560.123(4), by willfully failing to comply with the money laundering, enforcement, and reporting provisions of Florida Statute §655.50 relating to reports of transactions involving currency transactions, and such violation involves currency or other payment instruments in excess of \$100,000 in a 12-month period, a first degree felony;
- e. Money Laundering in violation of Florida Statute §896.101(3), and (5), by knowingly conducting or attempting to conduct financial transactions exceeding \$100,000 in a 12-month period knowing that the property involved in the financial transaction represents the proceeds of some form of unlawful activity, to wit: Organized Scheme to Defraud, Workers' Compensation Fraud, and Grand Theft, with the intent to promote the carrying on of the unlawful activity, or knowing that the transaction is designed in whole or part to conceal or disguise the nature, location, the

source, the ownership, or the control of proceeds of the unlawful activity, or to avoid a transaction reporting requirement, a first degree felony.

- f. Racketeering and Conspiracy in violation of Florida Statute §895.03, by receiving, with criminal intent, proceeds derived, directly or indirectly from a pattern of racketeering activity and using or investing such proceeds in the acquisition of title to, or right, interest, or equity in real property or in the establishment or operation of any enterprise, to wit: **Cell World Electronics, Corp., JOV Global Trading, Corp., MMV Trading & Logistics, LLC, Amazing Import & Export, Corp., Delta Machine Trading, Corp., M4M IMPORT & Export, Corp., T6P Tech Corp., GF Trading Solutions, Corp., and WWB Ventures, LLC.**

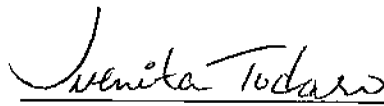
FURTHER AFFIANT SAYETH NAUGHT.



 BENJAMIN DUSENBERY, Deputy Sheriff

STATE OF FLORIDA:
COUNTY OF BROWARD:

The foregoing instrument was sworn to and subscribed before me by means of: physical presence or online notarization, this 16th day of August, 2022, by BENJAMIN DUSENBERY who is personally known to me, or who has produced _____ as identification.



 Signature of Notary Public



Juanita Todaro
 Comm #HH084132
 Expires: Jan 24, 2025
 Bonded Thru Aaron Notary

Print, type or stamp Commissioned Name