

UNITED STATES DISTRICT COURT
for the
District of Minnesota

IN THE MATTER OF THE SEARCH OF THE
SINGLE-FAMILY HOME LOCATED AT 10032
SCOTT AVENUE NORTH, BROOKLYN PARK,
MINNESOTA 55443, AS FURTHER DESCRIBED
IN ATTACHMENT A-1

SEALED BY ORDER OF THE COURT

Case No. 22-MJ-31 TNL

APPLICATION FOR A SEARCH WARRANT

I, Travis Wilmer, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A-1, incorporated here

located in the State and District of Minnesota, there is now concealed:

See Attachment B-1, incorporated here

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- X evidence of a crime;
X contraband, fruits of crime, or other items illegally possessed;
X property designed for use, intended for use, or used in committing a crime;
a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Table with 2 columns: Code Section, Offense Description. Rows include Title 18, United States Code, Section 1341 (Mail Fraud), Section 1343 (Wire Fraud), Section 1349 (Conspiracy), and Section 1956, 1957 (Money Laundering).

The application is based on these facts:

See Affidavit, incorporated here

X Continued on the attached sheet.

Travis Wilmer
Applicant's Signature

SUBSCRIBED and SWORN before me by reliable
electronic means (FaceTime, Zoom and/or email)
pursuant to Fed. R. Crim. P. 41(d)(3)

Date: January 13, 2022

Travis Wilmer, Special Agent
Federal Bureau of Investigation
Printed Name and Title

Tony N. Leung
Judge's Signature

City and State: Minneapolis, MN

The Honorable Tony N. Leung
United States Magistrate Judge
Printed Name and Title

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN) ss. AFFIDAVIT OF TRAVIS WILMER

Your affiant, Travis Wilmer, being duly sworn, does state the following is true and correct to the best of his knowledge and belief:

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since November 8, 2021.

2. As a Special Agent, my primary duties and responsibilities consist of conducting investigations of individuals and businesses for possible violations of federal laws. I am presently assigned to the FBI's Minneapolis, Minnesota field office where I am a member of the Civil Rights and Public Corruption Squad.

3. During my employment as a Special Agent, I have conducted and participated in investigations of varying degrees involving mail fraud, wire fraud, fraud against the government, money laundering, and other criminal acts, including criminal schemes where individuals misappropriate money from the investing public. Furthermore, in the course of my training and experience, I have become familiar with the types of records businesses typically maintain in the course of their regular activity, including ledgers, journals, invoices, receipts, and bank documents.

4. Based upon my work experience and training, as well as discussions with law enforcement agents, I know that:

 a. Businesses generally maintain or keep journals, ledgers, bank statements and records, receipts, invoices and other documents evidencing the

receipts and disbursements of funds, inventories, assets of the business and personnel information. These records are usually kept and maintained for extended periods of time, often several years, at the place of business or residence. I know from previous investigations that such records are also often maintained at the residence of subjects.

b. Individuals, including those receiving income from fraud schemes, often maintain within their residence records of assets and financial transactions. These items often include financial statements, receipts, invoices, bank statements and records, bank money order and cashier's check receipts, property records, investment records, assets, stock and bond records, tax records, correspondence, diaries, and handwritten notes. These records are often maintained for extended periods of time, often several years.

c. Due to the increasing prevalence of electronic communications and storage, paper records can be converted and stored electronically. As a result, any record or document could be found in either paper or electronic format.

d. Almost all wire transfers, even intrastate wire transfers, cross state lines.

5. This affidavit is submitted in support of an application for warrants to search:

a. The business located at 307 East Lake Street, Minneapolis, Minnesota 55408 ("**Subject Premises 1**");

b. The single-family home located at 10032 Scott Avenue North, Brooklyn Park, Minnesota 55443 (“**Subject Premises 2**”);

c. The business office located at 2434 University Ave West, Lower Level, St. Paul, Minnesota 55114 (“**Subject Premises 3**”);

d. The business located at 309 East Lake Street, Minneapolis, Minnesota 55408 (“**Subject Premises 4**”); and

e. The townhouse located at 3415 Fordham Court NE, Saint Anthony, Minnesota 55421 (“**Subject Premises 5**”) (collectively, the **Subject Premises**);

for evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1341 (mail fraud), 1343 (wire fraud), 1349 (conspiracy), and 1956/1957 (money laundering).

6. This affidavit is based on my personal knowledge, interviews of witnesses, physical surveillance, information received from other law enforcement agents, my experience and training, and the experience of other agents. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a search warrant for the Subject Premises, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence, instrumentalities, and fruits of violations of Title 18, United States Code, Sections 1341, 1343, 1349, and 1956/1957 are located at the Subject Premises.

I. OVERVIEW

7. In recent years, individuals and companies in Minnesota have engaged in a large-scale scheme to fraudulently obtain and misappropriate federally funded child nutrition programs. The scheme was carried out by individuals who owned and operated companies purportedly in the business of providing federally funded free meals to underprivileged children and adults, including during the global Covid-19 pandemic. The companies and their owners received tens of millions of dollars in federal funds for use in providing nutritious meals to underprivileged children and adults. Almost none of this money was used to feed children. Instead, the participants in the scheme misappropriated the money and used it to purchase real estate, cars, and other luxury items. To date, the conspirators have stolen millions of dollars in federal funds. The scheme is ongoing.

II. LOCATIONS TO BE SEARCHED

A. Subject Premises 1

8. **Subject Premises 1** is the business office located at 307 East Lake Street, Minneapolis, Minnesota 55408. **Subject Premises 1** is the location of S & S Catering Inc., a company that has fraudulently obtained and misappropriated Federal Child Nutrition Program funds.

9. According to Minnesota Secretary of State records, S & S Catering Inc. was created in 2018 by Qamar Ahmed Hassan. Secretary of State records identify **Subject Premises 1** as the address for S & S Catering.

10. On or about June 2, 2021, S & S Catering Inc. submitted an application to participate in the federal child nutrition program to the Minnesota Department of

Education. On the application, S & S Catering Inc. identified **Subject Premises 1** as the location for its food distribution site.

11. S & S Catering Inc. has an account at Woodlands National Bank into which federal funds were received and later misappropriated. **Subject Premises 1** is listed as the address on the account.

12. As explained below, in August 2021, members of the scheme purchased the building in which **Subject Premises 1** is located for \$3 million using misappropriated federal child nutrition program funds.

13. As of January 11, 2022, **Subject Premises 1** has a poster in the window that reads "S & S Catering."

14. There is a row of mailboxes inside of the building in which **Subject Premises 1** is located. As of January 4, 2022, one of the mailboxes is labeled "S & S Catering 307 E. Lake St." (a/k/a **Subject Premises 1**).

B. Subject Premises 2

15. **Subject Premises 2** is the single-family home located at 10032 Scott Avenue N, Brooklyn Park, Minnesota. **Subject Premises 2** is the home of Qamar Ahmed Hassan, the CEO of S & S Catering Inc.

16. Secretary of State records identify Qamar Ahmed Hassan as the CEO of S & S Catering Inc. and list **Subject Premises 2** as her address.

17. According to Hennepin County property records, **Subject Premises 2** is owned by Ali Mohamed Yusuf, who is believed to be Qamar Ahmed Hassan's husband. Bank records show that Ali Mohamed Yusuf received misappropriated

federal child nutrition program funds from S & S Catering Inc. and Academy for Youth Excellence, two of the companies involved in the scheme.

18. According to the Minnesota Department of Motor Vehicles, Qamar Ahmed Hassan has two vehicles registered to **Subject Premises 2**.

19. Qamar Ahmed Hassan has an account at Sunrise Bank into which she deposited misappropriated federal child nutrition program funds. **Subject Premises 2** is listed as the address on the account.

20. U.S. Postal Service records show that Qamar Ahmed Hassan receives mail at **Subject Premises 2**. Records show that Qamar Ahmed Hassan has received mail at **Subject Premises 2** in December 2021 and January 2022, including mail from TruStone Financial and Toyota Financial Services. During this same time period, mail addressed to S & S Catering Inc. and Youth Higher Educational Achievement, two of the companies that involved in the scheme to fraudulently misappropriate federal child nutrition program funds, has been sent to **Subject Premises 2**.

21. As explained below, in April and September 2021, Qamar Ahmed Hassan made international wire transfers to Nairobi, Kenya. These wire transfers totaled approximately \$505,000 and were used to purchase an apartment. Bank records show that these wire transfers were funded by misappropriated federal child nutrition program funds. Qamar Ahmed Hassan listed **Subject Premises 2** as her address on the wire transfers.

C. Subject Premises 3

22. **Subject Premises 3** is the business located at 2434 University Ave W, Lower Level, St. Paul, Minnesota 55114. **Subject Premises 3** is the location of Youth Inventor's Lab, a company used to fraudulently obtain and misappropriate Federal Child Nutrition Program funds.

23. According to Minnesota Secretary of State records, Youth Inventor's Lab is located at **Subject Premises 3**. Bekam Merdassa is listed as the President of Youth Inventor's Lab.

24. Youth Inventor's Lab began leasing out **Subject Premises 3** on or about June 1, 2020. The lease extends through May 31, 2022. Bekam Merdassa signed the lease as the Executive Director of Youth Inventor's Lab.

25. Youth Inventor's Lab participates in the federal child nutrition program through which it receives federal funds via the Minnesota Department of Education. The company's application to participate in the program identified **Subject Premises 3** as the company's address.

26. On or about January 11, 2022, an FBI agent conducted surveillance at **Subject Premises 3**. There was a sign that read "Epic" on the door. Bank records show that the owner of Youth Inventor's Lab, Bekam Merdassa, also owns a company called Epic Therapy.

D. Subject Premises 4

27. **Subject Premises 4** is the business located at 309 East Lake Street, Minneapolis, Minnesota 55408. Academy for Youth Excellence is located at **Subject Premises 4**.

28. As explained below, Academy for Youth Excellence is a company that receives and misappropriates federal child nutrition program funds. According to records obtained from the Minnesota Department of Education, Academy for Youth Excellence's program application identified **Subject Premises 4** as the location at which it purports to serve meals to underprivileged children. Academy for Youth Excellence has continued to identify **Subject Premises 4** as its location on its claims for reimbursements as part of the federal child nutrition program fund. According to Minnesota Secretary of State records, Academy for Youth Excellence is located at 309 East Lake Street.

29. As explained below, in August 2021, members of the scheme purchased the building in which **Subject Premises 4** is located for \$3 million using misappropriated federal child nutrition program funds.

E. Subject Premises 5

30. **Subject Premises 5** is the townhouse located at 3415 Fordham Court NE, Saint Anthony, Minnesota 55421. **Subject Premises 5** is the residence of Sahra Mohamed Nur, the owner of Academy for Youth Excellence. **Subject Premises 5** is also the office location and mailing address of Academy for Youth Excellence, a company used to fraudulently obtain and misappropriate Federal Child Nutrition Program funds.

31. According to Minnesota Secretary of State records, Academy for Youth Excellence was incorporated by Sahra Mohamed Nur on or about November 18, 2020. **Subject Premises 5** is listed as the company's address with the Secretary of State.

32. As explained below, Sahra Mohamed Nur and Abdiwahab Mohamud incorporated a company called Golis Properties LLC and used it to purchase three buildings in August 2021. They used \$2.5 million in misappropriated federal child nutrition program funds. Minnesota Secretary of State records list **Subject Premises 5** as the address for Golis Properties LLC. **Subject Premises 5** is listed as the address on the Golis Properties bank account used to purchase this real estate.

33. U.S. Postal Service records shows that Sahra Mohamed Nur and Golis Properties LLC received mail at **Subject Premises 5** in December 2021-January 2022. Specifically, Golis Properties LLC received a letter from Woodlands National Bank, the same bank through which the company purchased three buildings in Minneapolis (including the buildings in which **Subject Premises 1** and **Subject Premises 4** are located) using misappropriated federal funds.

34. On or about January 12, 2022, FBI surveillance agents observed a female driver in a blue Audi bearing Minnesota license plate BNK 861 driving south on Fordham Road away from **Subject Premises 5**. Minnesota Department of Motor Vehicles records shows that the Audi is registered to Sahra Mohamed Nur.

III. BACKGROUND

A. The Federal Child Nutrition Programs

35. This warrant relates to an ongoing investigation into a scheme to defraud U.S. Department of Agriculture (USDA) programs that provide federal funding to nutrition programs for children and low-income individuals across the nation. The USDA operates two such programs—the Summer Food Service Program and the Child and Adult Care Food Program.

36. The Summer Food Service Program (SFSP) is a federal program designed to ensure that low-income children continue to receive nutritious meals when school is not in session.

37. The Child and Adult Care Food Program (CACFP) is a federal program that provides reimbursements for nutritious meals and snacks to eligible children and adults who are enrolled for care at participating child care centers, day care homes, and adult day care centers. CACFP also provides reimbursements for meals served to children and youth participating in afterschool care programs, children residing in emergency shelters, and adults over the age of 60 or living with a disability and enrolled in day care facilities.

38. The Summer Food Service Program and Child and Adult Care Food Program (together, the “Federal Child Nutrition Programs”) operate throughout the United States. The USDA’s Food and Nutrition Service administers the programs at the national and regional levels by disbursing federal funds to state governments, which provide oversight over the Federal Child Nutrition Programs.

39. Within each state, the Federal Child Nutrition Programs are administered by the state department of education or an alternate state-designated agency. In Minnesota, the programs are administered by the Minnesota Department of Education (MDE).

40. Locally, meals funded by the Federal Child Nutrition Program are served at sites such as schools or daycare centers (“Sites”). Each Site must be sponsored by a public or private non-profit organization that is authorized to

participate in the Federal Child Nutrition Programs (“Sponsors”). Sponsors seeking to participate in the Federal Child Nutrition Programs are required to submit an application to the MDE for approval for each site from which they intend to operate Federal Child Nutrition Programs. Sponsors are responsible for monitoring each of their sites and preparing reimbursement claims for their sites.

41. Federal Child Nutrition Program funds are supposed to be used to provide nutritious meals and food to children and low-income individuals. *See* 7 C.F.R. § 225.15(a)(4) (“All Program reimbursement funds must be used solely for the conduct of the nonprofit food service operation.”).

42. Historically, the Federal Child Nutrition Program has generally functioned through the provision of meals to children involved in educational-based programs or activities. During the Covid-19 pandemic, however, the USAO waived some of the standard requirements for participation in the Federal Child Nutrition Program. Among other things, USDA allowed for-profit restaurants to participate in the program. It also allowed for off-site food distribution to children outside of educational program. At the same time, MDE’s stay-at-home order and telework policies interfered with the ability to oversee the program. According to MDE officials, this left the program vulnerable to fraud and abuse.

B. Feeding Our Future

43. This warrant related to the investigation of the widespread diversion and misuse of Federal Child Nutrition Program funds during the Covid-19 pandemic. In or about April 2021, MDE provided information to the FBI alleging that Feeding Our Future and sites under its sponsorship were diverting funds away from the

nutrition program. MDE believed certain sites were submitting fraudulent documents to support reimbursement of funds in addition to artificially inflating the number of children and low-income individuals receiving benefits in order to obtain funds.

44. Feeding Our Future is a non-profit organization purportedly in the business of helping community partners participate in the Federal Child Nutrition Program and related federal programs. Feeding Our Future sponsors and helps administer sites that participate in the Federal Child Nutrition Program. According to its website, Feeding Our Future “utilize[s] the Child and Adult Care Food Program to increase healthy food access for Minnesota’s youth and seniors.” The website lists Aimee Bock as the founder and executive director of Feeding Our Future.

45. Records obtained from MDE show that after being formed in 2017, Feeding Our Future quickly began receiving and distributing millions of dollars in Federal Child Nutrition Program Funds. The company went from receiving \$3.4 million in 2019 to more than \$197 million in 2021.

Year	Approximate amount of Federal Child Nutrition Program funds to Feeding Our Future
2018	\$307,253
2019	\$3,487,168
2020	\$42,681,790
2021	\$197,932,695
Total	\$244,408,906

46. MDE became concerned about the massive increase in Federal Child Nutrition Program funds going to sites sponsored by Feeding Our Future as well as the large increase in number of sites under Feeding Our Future sponsorship.

According to MDE employees, MDE began more carefully scrutinizing new site applications submitted by Feeding Our Future. Feeding Our Future later sued MDE, alleging that it unlawfully denied its site applications and withheld reimbursements to which Feeding Our Future and sites under its sponsorship were entitled. This lawsuit is currently pending in Ramsey County District Court.

47. At various times during this litigation, the presiding judge has concluded that MDE wrongfully withheld funds and violated federal regulations in its attempts to oversee Feeding Our Future and sites under its sponsorship.

48. In April 2021, MDE provided information to the FBI alleging that Feeding Our Future and sites under its sponsorship were diverting funds away from the nutrition program. MDE believed certain sites were submitting fraudulent documents to support reimbursement of funds in addition to artificially inflating the number of children and low-income individuals receiving benefits in order to obtain funds. But MDE did not have access to the participating companies' bank records so was unable to conclusively determine whether they were misappropriating Federal Child Nutrition Program funds.

49. In May 2021, the FBI began investigating the allegations surrounding the misuse of federal funds intended for feeding children and the low-income individuals. As part of this investigation, the FBI obtained records of hundreds of bank accounts that received, either directly or indirectly, Federal Child Nutrition Program funds. A review of these financial records showed a massive fraud scheme

involving the misuse and theft of tens of millions of dollars in Federal Child Nutrition Program funds.

IV. PROBABLE CAUSE


50. After learning of the potential scheme to fraudulently obtain and misappropriate Federal Child Nutrition Program funds, an FBI Forensic Accountant reviewed records of Minnesota companies submitting claims for reimbursements through the program. This review showed that S & S Catering, Youth Inventor's Lab, Academy for Youth Excellence, and Advance Youth Athletic Development appeared to be receiving suspiciously high amounts of reimbursements. These companies also appeared to be sharing funds and working together to carry out a scheme to fraudulently obtain and launder Federal Child Nutrition Program funds. The Forensic Accountant obtained records of bank accounts used by these companies to receive Federal Child Nutrition Program funds. A review of these records showed that the companies used little, if any, of this money to purchase food or provide meals to underprivileged children. Instead, they transferred the money among several companies in an order to launder and conceal the source and use of the funds. They then used much of the funds to purchase real estate, cars, and other items.


A. Youth Inventor's Lab

51. Youth Inventor's Lab is a Minnesota limited liability company located at **Subject Premises 3**. Bekam Merdassa is the Executive Director of Youth Inventor's Lab.

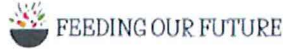
52. According to records obtained from MDE, Youth Inventor's Lab has been participating in the Federal Child Nutrition Program since in or about December

2020. In January 2021, Youth Inventor's Lab claimed to be serving breakfast and lunch to 300 children a day, six days a week.


FEEDING OUR FUTURE
SUMMER MEAL COUNTS – CLICKER

Sponsor	FEEDING OUR FUTURE		Email	almon@feedingourfuturemn.org		Phone	612.345.4922	
Site	YOUTH INVENTORS LAB		Supervisor			Week of		
Meal Type	<input checked="" type="checkbox"/> Breakfast	<input type="checkbox"/> Lunch	<input type="checkbox"/> Snack			1/17/2021		
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared	300	300	300	300	300	300	300	2100
Number of meals from yesterday	0	0	0	0	0	0	0	0
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children	300	300	300	300	300	300	300	2100
Number of second meals served to children (not reimbursed)	0	0	0	0	0	0	0	0
Number of meals served to program adults (not reimbursed)	0	0	0	0	0	0	0	0
Number of meals served to non-program adults (not reimbursed)	0	0	0	0	0	0	0	0
Number of children requesting meals of food is gone	0	0	0	0	0	0	0	0
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Number of non-reimbursable, incomplete or damaged meals	0	0	0	0	0	0	0	0
Number of leftover meals	0	0	0	0	0	0	0	0
Initials of person taking daily meal count certifying that the information is true and accurate	MA	MA	MA	MA	MA	MA	MA	MA
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature						Date	1/23/2021	

53. MDE records show that by February 2021, Youth Inventor's Lab claimed to be providing meals to 3,290 children a day. They reported that they were receiving food from S & S Catering.



AFTER-SCHOOL MEAL COUNTS – CLICKER

Sponsor	FEEDING OUR FUTURE		Email	aimee@feedingourfuturemn.org		Phone	612.345.4922	
Site	YOUTH INVENTORS LAB		Supervisor			Week of	02/21/2021	
Meal Type	X	SUPPER			X	SNACK		
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared	3290	3290	3290	3290	3290	3290	3290	23030
Number of meals from yesterday	0	0	0	0	0	0	0	0
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children	3290	3290	3290	3290	3290	3290	3290	23030
Number of second meals served to children (not reimbursed)	0	0	0	0	0	0	0	0
Number of meals served to program adults (not reimbursed)	0	0	0	0	0	0	0	0
Number of meals served to non-program adults (not reimbursed)	0	0	0	0	0	0	0	0
Number of children requesting meals of food is gone	0	0	0	0	0	0	0	0
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE	NA	NA	NA	NA	NA	NA	NA	
Number of non-reimbursable, incomplete or damaged meals	0	0	0	0	0	0	0	0
Number of leftover meals	0	0	0	0	0	0	0	0
Initials of person taking daily meal count certifying that the information is true and accurate	AA	AA	AA	AA	AA	AA	AA	
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature						Date	2/27/2021	

54. MDE records show that Youth Inventor’s Lab received approximately \$843,000 in reimbursements from the Federal Child Nutrition Program for January and February 2021.

55. In all, MDE records show that Youth Inventor’s Lab received more than \$3.6 million in Federal Child Nutrition Program funds from Feeding Our Future in 2021.

56. Most of these funds were deposited into an account held by Youth Inventor’s Lab at U.S. Bank. Bank records show that the Youth Inventor’s Lab received approximately \$3,028,786 in Federal Child Nutrition Program funds from Feeding Our Future from March to July 2021. This represented more than 97 percent of the total deposits into the account during that time period.

57. A review of bank records show that Youth Inventor's Lab did not use the Federal Child Nutrition Program funds to purchase food or serve meals to underprivileged. Of this money, approximately \$2,708,981 was sent to S & S Catering and \$322,780 was sent to Gusto, a company that provides cloud-based payroll services.

58. Records obtained from MDE show that S & S Catering was ostensibly a vendor providing meals to Youth Inventor's Lab. So, at first glance, the \$2,708,981 appears as though it could have been used to purchase food or meals from S & S Catering. But a review of S & S Catering's bank accounts shows that little of the money it received from Youth Inventor's Lab (and other sites) was used to purchase food or prepare meals for underprivileged children. Instead, as explained below, the money was fraudulently misappropriated and used to benefit members of the scheme.

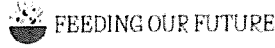
B. Academy for Youth Excellence

59. Academy for Youth Excellence is another company that appears to be fraudulently misappropriating Federal Child Nutrition Program funds. Academy for Youth Excellence is located at **Subject Premises 4** and using **Subject Premises 5** as its mailing address.

60. Sahra Mohamed Nur obtained an Employer Identification Number (EIN) for Academy for Youth Excellence from the Internal Revenue Service on or about November 2, 2020. The address listed on the EIN form was 309 East Lake Street, Suite 200, Minneapolis, Minnesota (a/k/a **Subject Premises 4**). According to Minnesota Secretary of State records, Sahra Mohamed Nur incorporated Academy for Youth Excellence on or about November 18, 2020.

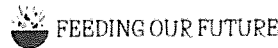
61. On or about December 2, 2020, Sahra Mohamed Nur emailed Academy for Youth Excellence's incorporation paperwork to Aimee Bock. Academy for Youth Excellence applied to participate in the Federal Child Nutrition Program starting in December 2020. According to its application submitted via Feeding Our Future, meals provided by Academy for Youth Excellence were to be prepared on site at 309 East Lake Street, Suite 200, Minneapolis, Minnesota (a/k/a **Subject Premises 4**). Based on surveillance, **Subject Premises 4** is Benadir Hall, a large banquet hall. According to Minnesota Secretary of State records, Benadir Hall Inc.'s principal place of business is 309 East Lake Street (**Subject Premises 4**) and its mailing address is 3415 Fordham Court NE, Minneapolis, Minnesota 55421 (a/k/a **Subject Premises 5**). 3415 Fordham Court NE is also the mailing address of Academy for Youth Excellence.

62. By December 27, 2020, Sahra Mohamed Nur claimed that Academy for Youth Excellence was serving breakfast and lunch to 2,500 children a day, five days a week.



SUMMER MEAL COUNTS – CLICKER


Sponsor	FEEDING OUR FUTURE	Email	aimie@feedingourfuturemn.org				Phone	612 345 4922	
Site	ACADEMY FOR YOUTH EXCELLENCE	Supervisor					Week of	12/27/20	
Meal Type	<input checked="" type="checkbox"/> BREAKFAST						<input type="checkbox"/> LUNCH		
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
Number of meals received/prepared	2500	2500	2500	2500	2500			12500	
Number of meals from yesterday	0	0	0	0	0			0	
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
Number of firsts served to children	2500	2500	2500	2500	2500			12500	
Number of second meals served to children (not reimbursable)	0	0	0	0	0			0	
Number of meals served to program adults (not reimbursable)	0	0	0	0	0			0	
Number of meals served to non-program adults (not reimbursable)	0	0	0	0	0			0	
Number of children requesting meals of food is gone	0	0	0	0	0			0	
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
FOOD TEMPERATURE	N/A	N/A	N/A	N/A	N/A			N/A	
Number of non-reimbursable, incomplete or damaged meals	0	0	0	0	0			0	
Number of leftover meals	0	0	0	0	0			0	
Initials of person taking daily meal count certifying that the information is true and accurate	SN	SN	SN	SN	SN			SN	
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.									
Signature	SAHRA M. NUR					Date	12/31/20		



SUMMER MEAL COUNTS – CLICKER

Sponsor	FEEDING OUR FUTURE	Email	aimie@feedingourfuturemn.org				Phone	612 345 4922	
Site	ACADEMY FOR YOUTH EXCELLENCE	Supervisor					Week of	12/27/20	
Meal Type	<input type="checkbox"/> BREAKFAST						<input checked="" type="checkbox"/> LUNCH		
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
Number of meals received/prepared	2500	2500	2500	2500	2500			12500	
Number of meals from yesterday	0	0	0	0	0			0	
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
Number of firsts served to children	2500	2500	2500	2500	2500			12500	
Number of second meals served to children (not reimbursable)	0	0	0	0	0			0	
Number of meals served to program adults (not reimbursable)	0	0	0	0	0			0	
Number of meals served to non-program adults (not reimbursable)	0	0	0	0	0			0	
Number of children requesting meals of food is gone	0	0	0	0	0			0	
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL	
FOOD TEMPERATURE	N/A	N/A	N/A	N/A	N/A			N/A	
Number of non-reimbursable, incomplete or damaged meals	0	0	0	0	0			0	
Number of leftover meals	0	0	0	0	0			0	
Initials of person taking daily meal count certifying that the information is true and accurate	SN	SN	SN	SN	SN			SN	
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.									
Signature	SAHRA M. NUR					Date	12/31/20		

63. By the week of January 4, 2021, Sahra Mohamed Nur was claiming that Academy for Youth Excellence was serving breakfast and lunch to 2,500 children a day, seven days a week.

 FEEDING OUR FUTURE SUMMER MEAL COUNTS – CLICKER										
Sponsor	FEEDING OUR FUTURE	Email	ajmee@feedingourfuturemn.org				Phone	612.345.4922		
Site	ACADEMY FOR YOUTH EXCELLENCE	Supervisor					Week of	1/24/21		
Meal Type	<input checked="" type="checkbox"/> BREAKFAST				<input type="checkbox"/> LUNCH					
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL		
Number of meals received/prepared	2500	2500	2500	2500	2500	2500	2500	17500		
Number of meals from yesterday	0	0	0	0	0	0	0	0		
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL		
Number of firsts served to children	2500	2500	2500	2500	2500	2500	2500	17500		
Number of second meals served to children (not reimbursed)	0	0	0	0	0	0	0	0		
Number of meals served to program adults (not reimbursed)	0	0	0	0	0	0	0	0		
Number of meals served to non-program adults (not reimbursed)	0	0	0	0	0	0	0	0		
Number of children requesting meals if food is gone	0	0	0	0	0	0	0	0		
FOOD TEMPERATURE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Number of non-reimbursable, incomplete or damaged meals	0	0	0	0	0	0	0	0		
Number of leftover meals	0	0	0	0	0	0	0	0		
Initials of person taking daily meal count certifying that the information is true and accurate	SN	SN	SN	SN	SN	SN	SN	SN		
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate										
Signature	SAHRA M. NUR					Date	1/30/21			

64. Based on these claims, Academy for Youth Excellence received approximately \$739,000 in Federal Child Nutrition Program funds for January and February 2021.

65. Bank records show that Academy for Youth Excellence received more than \$4.1 million in Federal Child Nutrition Program funds in 2021. These funds were deposited into accounts held by Academy for Youth Excellence at Woodlands Bank and TruStone Financial Credit Union.

66. Bank records show that approximately \$3,337,547 in Federal Child Nutrition Program funds were deposited into Academy for Youth Excellence's account

at Woodlands Bank between February and November 2021. This represented more than 92 percent of the total deposits into the account during that period.

67. Bank records show that almost all of this money was transferred to S & S Catering, Sahra Mohamed Nur, or Benadir Hall.

Entity	Owner	Amount Transferred (approximate)
S & S Catering	Qamar Ahmed Hassan	\$2,666,000
Benadir Hall	Abdullahe Jesow	\$115,000
Sahra Mohamed Nur	Sahra Mohamed Nur	\$89,340
S & S Catering	Qamar Ahmed Hassan	\$50,000
	Total	\$2,920,340

68. A review of these bank accounts show that little or none of this money was used to purchase food or provide meals to underprivileged children.

69. Bank records show that Academy for Youth Excellence received approximately \$948,541 in Federal Child Nutrition Program funds into its account at TruStone Financial Credit Union between February and May 2021. This represented more than 95 percent of the total deposits into the account during that period.

70. Bank records show that none of this money appears to have been used to purchase food or serve meals. Instead, approximately \$820,000 of this money was transferred to accounts held by S & S Catering. Another \$100,000 was transferred to another account held by Academy for Youth Excellence.

Entity	Owner	Amount Transferred (approximate)
S & S Catering Inc.	Qamar Ahmed Hassan	\$460,000
S & S Catering	Qamar Ahmed Hassan	\$250,000
S & S Catering	Qamar Ahmed Hassan	\$110,000
Academy for Youth Excellence	Sahra Mohamed Nur	\$100,000

	Total	\$920,000
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71. Records obtained from MDE show that S & S Catering was supposed to be a vendor providing meals to Academy for Youth Excellence. But a review of S & S Catering's bank accounts show that little of the money it received from Youth Academy for Youth Excellence was used to purchase food or prepare meals for underprivileged children.

C. Advance Youth Athletic Development

72. Advance Youth Athletic Development, also known as "Central Avenue Lofts," also appears to have fraudulently received Federal Child Nutrition Program funds.

73. Advance Youth Athletic Development was incorporated in February 2021. Minnesota Secretary of State records list 920 24th Avenue NE, Unit 220, Minneapolis, Minnesota 55418 as the address for Advance Youth Athletic Development. This is a unit in the Central Avenue Lofts apartment building.

74. Advance Youth Athletic Development applied to participate in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future. The application indicated that the meals would be served at the Central Avenue Lofts apartment building. Advance Youth Athletic Development submitted claims to MDE that it was serving an afterschool snack and supper to 5,000 children a day in March 2021. The company claimed that it was entitled to approximately \$730,000 in reimbursements from the Federal Child Nutrition Program for that month alone.

75. This is an exceedingly large number of children. By way of comparison, the largest high school in the state of Minnesota—Wayzata High School—has an enrollment of approximately 3,600 students.

76. MDE initially denied the site application in April 2021. In May 2021, Feeding Our Future appealed MDE's decision, and eventually was enrolled in the program and provided reimbursements from the Federal Child Nutrition Program.

77. In all, MDE records show that Advance Youth Athletic Development, also known as "Central Avenue Lofts," received approximately \$3.2 million in Federal Child Nutrition Program funds in 2021.

78. By way of comparison, the average McDonalds franchise has approximately \$2.9 million in annual revenue, according to QSR, a trade magazine for the quick-service and fast-casual restaurant industry.¹

D. S & S Catering Inc.

79. S & S Catering Inc. is one of the companies fraudulently receiving and misappropriating Federal Child Nutrition Program funds.

80. According to the Minnesota Secretary of State, S & S Catering Inc. was organized in or about November 2018 by Qamar Ahmed Hassan. The company's registered office and principal executive office is listed as 307 East Lake Street, Minneapolis, Minnesota 55407 (a/k/a **Subject Premises 1**).

¹ See <https://www.qsr magazine.com/content/these-29-fast-food-brands-earn-most-restaurant> (last accessed Nov. 2, 2021).

81. S & S Catering LLC participated in the Federal Child Nutrition Program under the sponsorship of both Feeding Our Future and Partners in Nutrition. S & S Catering is a for-profit company that participated in the Federal Child Nutrition Program both as a vendor that provided food to sites that claimed to be serving meals to underprivileged children and as a site that itself served meals to children.

82. S & S Catering received its reimbursements from the Federal Child Nutrition Program into an array of banks accounts it held at Bank of America, Woodlands National Bank, Sunrise Bank, JP Morgan Chase, and TruStone Financial. Qamar Ahmed Hassan and Mohamed A. Mohamud are signatories on the accounts.

83. A review of these accounts shows that in 2020 and 2021 S & S Catering received more than \$3.2 million in Federal Child Nutrition Program funds directly from Feeding Our Future and another \$1.3 million from Partners in Nutrition. As discussed above, bank records show that S & S Catering also received millions of dollars from other companies that participated in and received money from the Federal Child Nutrition Program, including Youth Inventor’s Lab, Academy for Youth Excellence, Youth High Educational Achievement, and Advance Youth Athletic Development. In all, S & S Catering received more than \$13.8 million in Federal Child Nutrition Programs funds in 2020 and 2021.

Source of Funds	Entity Owner	Amount Deposited (approximate)
Academy for Youth Excellence	Sahra Mohamed Nur	\$3,486,000

Feeding Our Future	--	\$3,244,314
Youth Inventor's Lab	Bekam Merdassa	\$2,358,926
Advance Youth Athletic Development	Guhaad Said	\$2,013,000
Youth Higher Educational Achievement	Filsan Mumin Hassan ²	\$1,448,000
Partners in Nutrition	--	\$1,316,310
	Total	\$13,866,550

84. A review of records from the S & S Catering bank accounts show that S & S Catering only used approximately \$465,000—or 3.3 percent—of the Federal Child Nutrition Program funds it received to buy food or meals to serve to underprivileged children. Instead, bank records show that the vast majority of the money was transferred to the owners of S & S Catering or used for the benefit of individuals involved in the scheme.

Use of Funds	Related Person or Entity	Amount (approximate)
Transfers to Golis Properties	Qamar Ahmed Hassan Mohamed A. Mohamud Sahra Mohamed Nur	\$3,865,932
Transfers to Transportation Companies	--	\$2.2 million
Payments to Individuals employed by or related to S & S Catering	--	\$1,397,000
Transfers to Title Companies for Purchase of Real Estate	Bankers Title Executive Title North Star Realty North Title	\$1,190,000
Payments to Qamar Ahmed Hassan	Qamar Ahmed Hassan, owner of S & S Catering	\$757,624
Cash Withdrawals		\$281,382
Payments to Benadir Hall	Abdullahe Jesow	\$224,300

² U.S. Postal Service records show that Filsan Mumin Hassan lives with Qamar Ahmed Hassan at **Subject Premises 2**.

Wire Transfer to China	Kafi General Trading	\$160,000
Payments to Sahra Mohamed Nur	Sahra Mohamed Nur, owner of Academy for Youth Excellence	\$92,200
HOM Furniture ³	--	\$52,412
	Total⁴	\$10,168,438

85. Based on my training and experience, and conversations with other federal agents and FBI forensic accountants, this activity appears to have been designed to launder the money fraudulently obtained from the Federal Child Nutrition Program.

E. Qamar Ahmed Hassan and Sahra Mohamed Nur Used Federal Child Nutrition Program Funds to Purchase Real Estate in Minneapolis

86. In or about August 2021, Qamar Ahmed Hassan and Sahra Mohamed Nur used \$2.5 million in Federal Child Nutrition Program funds to purchase three buildings in south Minneapolis. As explained below, they created an LLC for use in purchasing the properties and through which they concealed both their ownership of the property and the fact that they purchased the buildings using Federal Child Nutrition Program funds.

87. According to Minnesota Secretary of State records, Sahra Mohamed Nur created Golis Properties LLC in December 2020. Secretary of State records list 309 East Lake Street, Minneapolis, Minnesota 55408 a/k/a **Subject Premise 4**, as the company's registered address and principal executive office. Sahra Mohamed Nur is

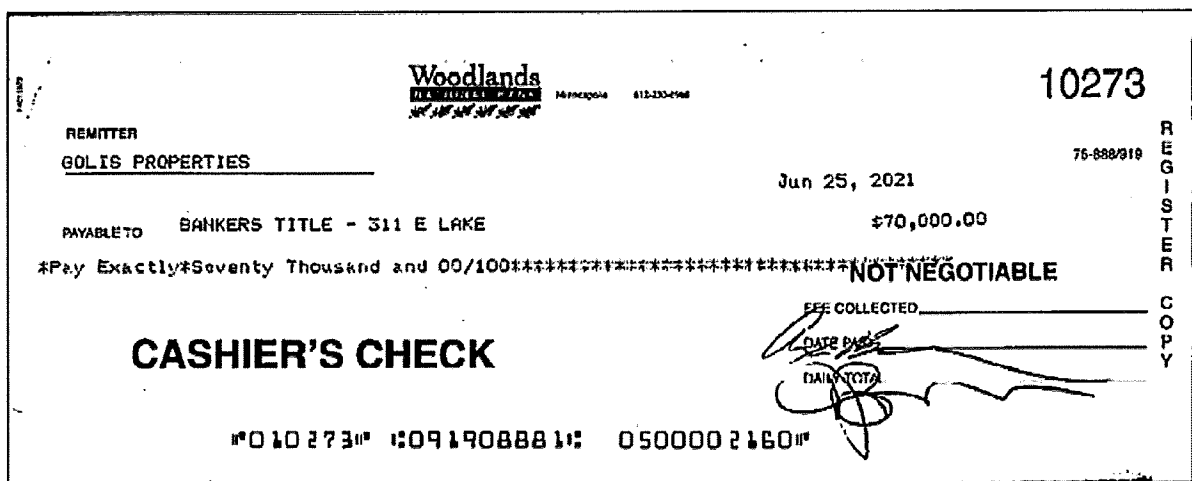
³ HOM Furniture is a retail furniture store with locations in the Twin Cities and throughout the upper Midwest.

⁴ S & S Catering had approximately \$2.3 million remaining in its accounts as of late 2021.

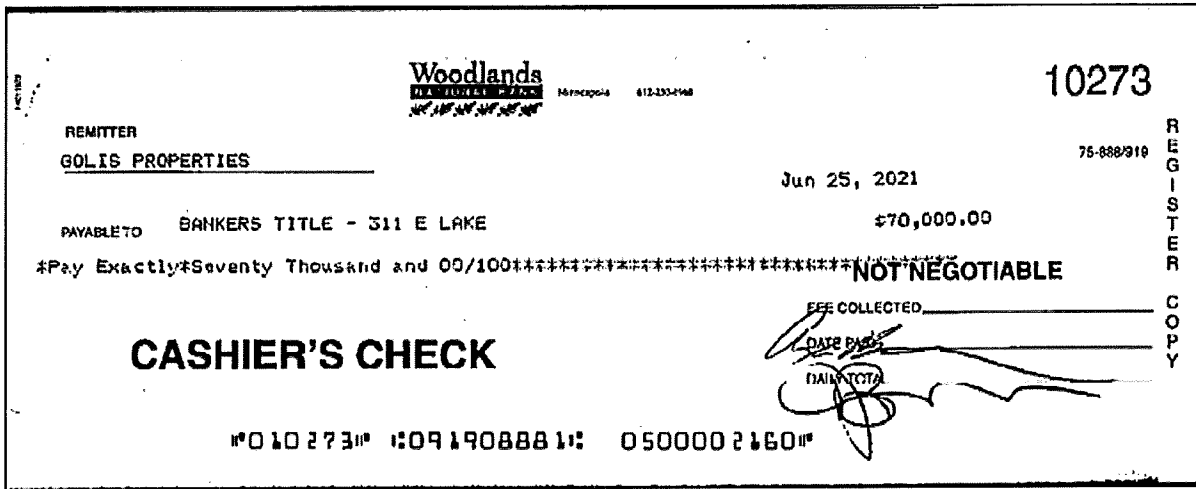
listed as the company's organizer. 3415 Fordham Court NE, Minneapolis, Minnesota 55421 (a/k/a **Subject Premises 5**) is listed as Sahra Mohamed Nur's address with the Secretary of State. Abdiwahab Mohamud is currently listed as the company's registered agent. 3415 Fordham Court NE, Minneapolis, Minnesota 55421 (a/k/a **Subject Premises 5**) is listed as his address.

88. Golis Properties LLC has an account at Woodlands National Bank. Bank records show that Qamar Ahmed Hassan, Sahra Mohamed Nur, and Abdiwahab A. Mohamud are signatories on the account.

89. Bank records show that Qamar Ahmed Hassan obtained two cashier's checks from the Golis Properties LLC account at Woodlands National Bank to Banker's Title, a title company based in Mendota Heights, Minnesota. The first check was for \$70,000 and was written to "Banker's Title – 311 E. Lake."



90. The second check was for \$30,000 and was written to "Banker's Title – 301 E. Lake."



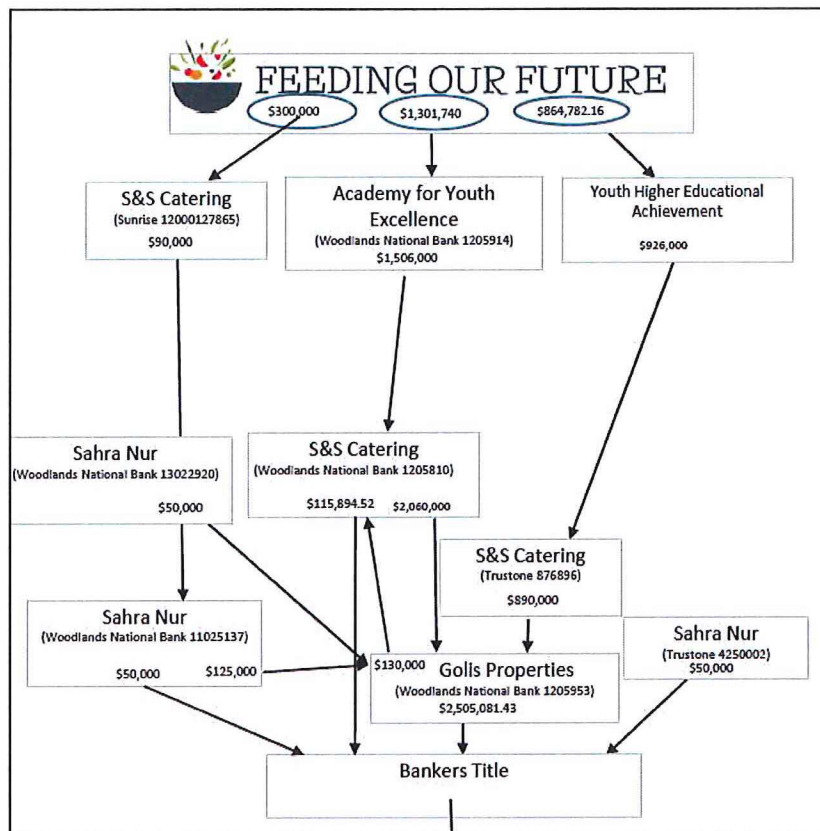
91. Bank records show that on or about August 26, 2021, Abdiwahab A. Mohamud wired approximately \$2,395,966 from the Golis Properties LLC account at Woodlands National Bank to Banker's Title. In all, Golis Properties paid approximately \$2,505,081 to Banker's Title in the summer of 2021.

92. Records obtained from Banker's Title show that Golis Properties LLC used this money to purchase three properties in Minneapolis on or about August 30, 2021:

- a. The commercial building located at 301-309 East Lake Street for approximately \$3 million;
- b. The commercial building located at 311-319 East Lake Street for approximately \$1.7 million; and
- c. The residential building located at 3018 3rd Avenue South for approximately \$257,732.

93. As depicted in the below chart, the vast majority of the money used to purchase these buildings was derived from fraudulently misappropriated Federal

Child Nutrition Program funds. Specifically, this money was derived from Federal Child Nutrition Program funds paid to companies run by partners in Golis Properties—S & S Catering (Qamar Ahmed Hassan), Academy for Youth Excellence (Sahra Mohamed Nur) or their associates—Youth Higher Educational Achievement (Filsan Mumin Hassan, who lives with Qamar Ahmed Hassan at **Subject Premises 2**).





94. Hennepin County property records show that Golis Properties LLC is the current owner of each of these properties.

95. Bank records show that the Golis Properties LLC account at Woodlands National Bank has a balance of approximately \$1.3 million as of October 22, 2021. Bank records show that all of this money was derived from Federal Child Nutrition Program funds.

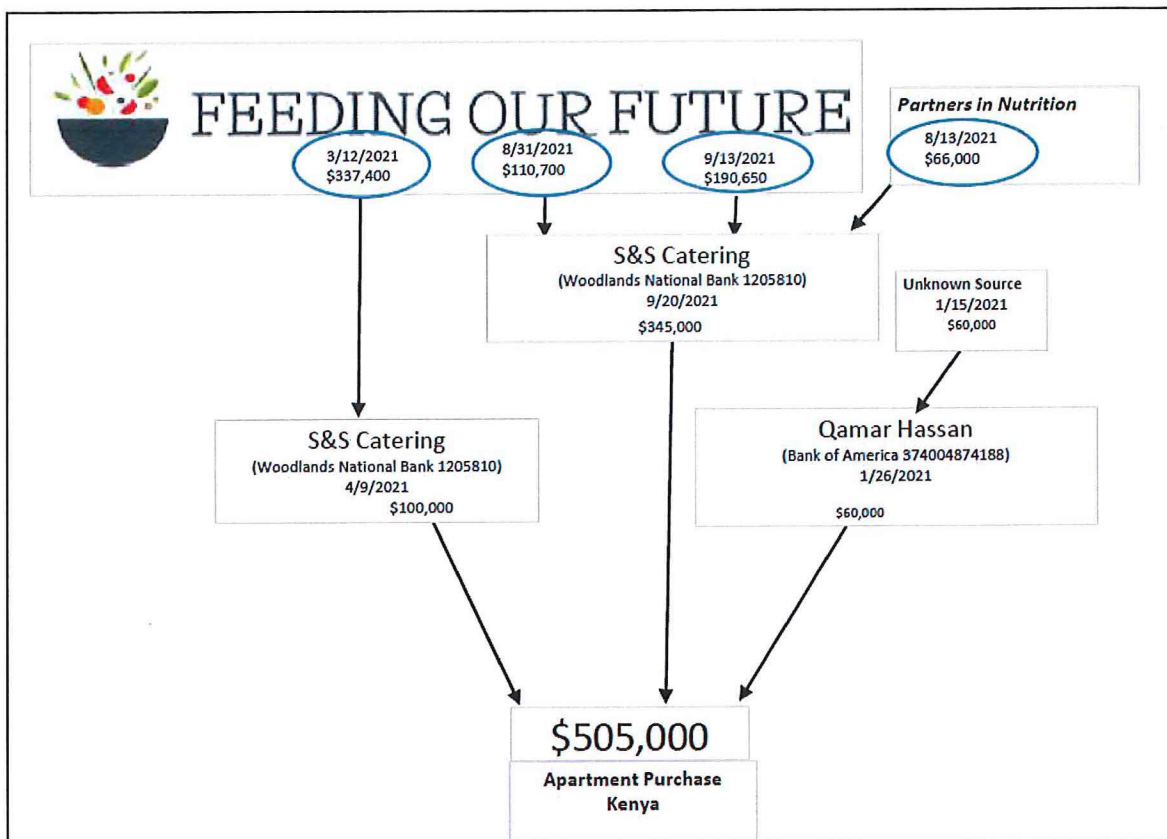
F. The Owner of S & S Catering Used More Than \$500,000 in Federal Child Nutrition Program Funds to Purchase Real Estate in Nairobi, Kenya

96. The owner of S & S Catering, Qamar Ahmed Hassan, also used \$505,000 in Federal Child Nutrition Program funds to purchase an apartment in Nairobi, Kenya.

97. Bank records show that on or about April 9, 2021, Qamar Ahmed Hassan wired \$100,000 from the an S & S Catering account at Woodlands National Bank to North Star Realty Limited in Nairobi, Kenya. The transcription description on the wire transfer states that the money was for an “apartment purchase.”

98. Several months later, on or about September 17, 2021, Qamar Ahmed Hassan wired another \$345,000 from that same S & S Catering account at Woodlands National Bank to North Star Realty Limited. The transcription description on this request also indicates that the money was for an “apartment purchase.”

99. As depicted in the below chart, bank records show that Qamar Ahmed Hassan used Federal Child Nutrition Program funds to purchase this apartment. Specifically, the money transferred to Kenya can be traced to Federal Child Nutrition Program funds paid to S & S Catering by Feeding Our Future and deposited into accounts held by S & S Catering at Woodlands National Bank.



G. S & S Catering also used Federal Child Nutrition Program Funds to Purchase Cars and Fund Personal Travel

100. The owners of S & S Catering also used Federal Child Nutrition Program funds to buy cars and to fund personal travel.

101. For example, bank records show that approximately \$100,000 in checks were written from S & S Catering bank accounts to car dealerships in 2021, including:

- a. On or about January 19, 2021, Qamar Ahmed Hassan wrote a \$5,000 check from an S & S Catering account at Bank of America to Big & Save Auto Sales, a used car dealership in Minneapolis.

b. On or about June 10, 2021, a \$20,000 check from an S & S Catering account at TruStone Financial to McKay's Dodge, a car dealership in Waite Park, Minnesota.

c. On or about June 17, 2021, a \$60,000 cashier's check was obtained from the S & S Catering account at TruStone Financial to Luther Brookdale Jeep, a car dealership in Brooklyn Park, Minnesota.

d. On or about October 2021, Qamar Ahmed Hassan wrote a \$15,000 check from an S & S Catering account at Woodlands National Bank to East Side Auto, a used car dealership in St. Paul.

102. Bank records show that Qamar Ahmed Hassan also used Federal Child Nutrition Program funds for personal travel, including:

a. In May and June 2021, Qamar Ahmed Hassan wrote approximately \$27,000 in checks from S & S Catering bank accounts at TruStone Financial and Woodlands National Bank to Amax Travel, a travel agency that specializes in Hajj travel packages.

b. In July 2020, Qamar Ahmed Hassan wrote a check for \$21,848 from an S & S Catering account at TruStone Financial to Universal Travel, a travel agency in Minneapolis.

V. COMPUTERS, ELECTRONIC STORAGE, AND FORENSIC ANALYSIS

103. Based upon my knowledge, training, experience, and the experience of other law enforcement personnel, I know that computer hardware and computer software may be utilized to store records which include, but are not limited to: those relating to business activities, criminal activities, associate names and addresses,

victims' names, addresses, and images, the identity and location of assets illegally gained through criminal activity, and other information related to criminal activity.

104. As described above and in Attachment B, this application seeks permission to search for records that might be found at the Subject Premises, in whatever form they are found. One form in which the records might be found is data stored on a computer's hard drive, cellular telephone, or other storage media. Thus, the warrant applied for would authorize the seizure of electronic storage media or, potentially, the copying of electronically stored information, all under Rule 41(e)(2)(B).

Probable Cause to Seize Electronic Devices at Subject Premises

105. I submit that if a computer, cellular telephone, or other storage medium is found on the Subject Premises, there is probable cause to believe those records will be stored on that computer or storage medium, for at least the following reasons:

a. Based on my knowledge, training, and experience, I know that computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files downloaded to a storage medium can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. This is so because when a person "deletes" a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the storage medium until it is overwritten by new data.

b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the storage medium that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer’s operating system may also keep a record of deleted data in a “swap” or “recovery” file.

c. Wholly apart from user-generated files, computer storage media—in particular, computers’ internal hard drives—contain electronic evidence of how a computer has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory “swap” or paging files. Computer users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.

d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or “cache.”

e. Based on actual inspection of other evidence related to this investigation, including emails obtained through search warrants, I am aware that computer equipment was used to carry out this fraud scheme. There is reason to believe that there is a computer system currently located on the Subject Premises.

106. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only computer files that might serve as direct evidence of the crimes described on the warrant, but also for forensic electronic

evidence that establishes how computers were used, the purpose of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on any storage medium in the Subject Premises because:

a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created, although this information can later be falsified.

b. As explained herein, information stored within a computer and other electronic storage media may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, information stored within a computer or storage media (e.g., registry information, communications, images and movies, transactional information, records of session times and

durations, internet history, and anti-virus, spyware, and malware detection programs) can indicate who has used or controlled the computer or storage media. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. The existence or absence of anti-virus, spyware, and malware detection programs may indicate whether the computer was remotely accessed, thus inculcating or exculpating the computer owner. Further, computer and storage media activity can indicate how and when the computer or storage media was accessed or used. For example, as described herein, computers typically contain information that log: computer user account session times and durations, computer activity associated with user accounts, electronic storage media that connected with the computer, and the IP addresses through which the computer accessed networks and the internet. Such information allows investigators to understand the chronological context of computer or electronic storage media access, use, and events relating to the crime under investigation. Additionally, some information stored within a computer or electronic storage media may provide crucial evidence relating to the physical location of other evidence and the suspect. For example, images stored on a computer may both show a particular location and have geolocation information incorporated into its file data. Such file data typically also contains information indicating when the file or image was created. The existence of such image files, along with external device connection logs, may also indicate the presence of additional electronic storage media (e.g., a digital camera or cellular phone with an incorporated camera). The geographic and timeline information

described herein may either inculcate or exculpate the computer user. Last, information stored within a computer may provide relevant insight into the computer user's state of mind as it relates to the offense under investigation. For example, information within the computer may indicate the owner's motive and intent to commit a crime (e.g., internet searches indicating criminal planning), or consciousness of guilt (e.g., running a "wiping" program to destroy evidence on the computer or password protecting/encrypting such evidence in an effort to conceal it from law enforcement).

c. A person with appropriate familiarity with how a computer works can, after examining this forensic evidence in its proper context, draw conclusions about how computers were used, the purpose of their use, who used them, and when.

d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of forensic evidence on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. While it is possible to specify in advance the records to be sought, computer evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

107. I know that when an individual uses a computer to commit a crime, in this case, tax evasion and fraudulent tax returns, the individual's computer will

generally serve both as an instrumentality for committing the crime, and also as a storage medium for evidence of the crime. The computer is an instrumentality of the crime because it is used as a means of committing the criminal offense. The computer is also likely to be a storage medium for evidence of crime. From my training and experience, I believe that a computer used to commit a crime of this type may contain: data that is evidence of how the computer was used; data that was sent or received; notes as to how the criminal conduct was achieved; records of Internet discussions about the crime; and other records that indicate the nature of the offense.

108. *Necessity of seizing or copying entire computers or storage media.* Based upon my knowledge, training and experience, and the experience of other law enforcement personnel, I know that in order to completely and accurately retrieve data maintained in computer hardware or on computer software, all computer equipment, should be processed by a qualified computer specialist in a laboratory or other competent setting. This is due to:

a. *The volume of evidence.* Computer storage devices (like hard disks, removable media, optical media, diskettes, tapes, laser disks, Bernoulli drives) can store the equivalent of millions of pages of information. Additionally, a suspect may try to conceal criminal evidence; he or she might store it in random order with deceptive file names, or use encryption or steganography software. This may require searching authorities to examine all the stored data to determine which particular files are evidence or instrumentalities of crime. This sorting process can take weeks

or months, depending on the volume of data stored, and it would be impractical to attempt this kind of data search on site;

b. *The technical requirements.* Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert is qualified to analyze a system and its data. In any event, however, data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to inadvertent or intentional modification or destruction (from external sources or destructive code imbedded in the system as a booby trap), a controlled environment is essential to its complete and accurate analysis. Further, when a user deletes a file on a computer, only the pointer (a tool that tells the operating system where the file is located on the media) to the file is deleted. The actual file may remain on the media for a long period of time, possibly years. Forensics examiners can use software tools that can locate and partially and/or fully recover deleted files;

c. *System functionality.* Computer systems are very complicated and the proper operation of the system may be dependent upon the hardware that is connected to it. For this reason, it is usually necessary to seize all hardware connected

to the equipment in order to ensure the proper operation of the system during the analysis process.

d. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the device consistent with the warrant. The examination may require authorities to employ techniques, including, but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

109. The search warrant requests authorization to use the biometric unlock features of a device, based on the following, which I know from my training, experience, and review of publicly available materials:

a. Users may enable a biometric unlock function on some digital devices. To use this function, a user generally displays a physical feature, such as a fingerprint, face, or eye, and the device will automatically unlock if that physical feature matches one the user has stored on the device. To unlock a device enabled with a fingerprint unlock function, a user places one or more of the user's fingers on a device's fingerprint scanner for approximately one second. To unlock a device enabled with a facial, retina, or iris recognition function, the user holds the device in front of the user's face with the user's eyes open for approximately one second.

b. In some circumstances, a biometric unlock function will not unlock a device even if enabled, such as when a device has been restarted or inactive, has not been unlocked for a certain period of time (often 48 hours or less), or after a

certain number of unsuccessful unlock attempts. Thus, the opportunity to use a biometric unlock function even on an enabled device may exist for only a short time. I do not know the passcodes of the devices likely to be found in the search.

110. Thus, the warrant I am applying for would permit law enforcement personnel to, with respect to any device that appears to have a biometric sensor and falls within the scope of the warrant. As set forth above, the Subject Premises are locations from which fraudulent companies are being run and where multiple individuals who, together, commit fraud together may be found. In my training and experience, I know that business locations often contain a variety of electronics, to include computers and cellular telephones. I further know that in this case, such electronic are being actively used to carry out the fraud scheme, to include being used to email lead leads and to make fraudulent phone calls to customers. Digital devices found at the Subject Premises may or may not have a clearly identifiable user based on the exterior of the device and/or may have multiple users whose biometric features may unlock the devices. Thus, if while executing the warrant, law enforcement personnel encounter a digital device within the scope of the warrant that may be unlocked using one of the aforementioned biometric features, the warrant I am applying for would permit law enforcement personnel to, with respect to every person who is located at the Subject Premises during the execution of the search: (1) depress the person's thumb- and/or fingers on the device(s); and (2) hold the device(s) in front of the face of the person with his or her eyes open to activate the facial-, iris-, and/or retina-recognition feature.

VI. CONCLUSION

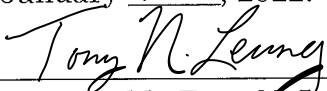
111. Based on the facts set forth above, and based on my training, experience, knowledge, and the aforementioned facts of this investigation, there is probable cause to believe that evidence and instrumentalities of tax evasion and related tax offenses, in violation of 18 U.S.C. §§ 1341, 1343, 1349 1956 and 1957, as described in Attachment B, can be found at the Subject Premises, as further described in Attachment A.

Respectfully submitted,



FBI Special Agent Travis Wilmer

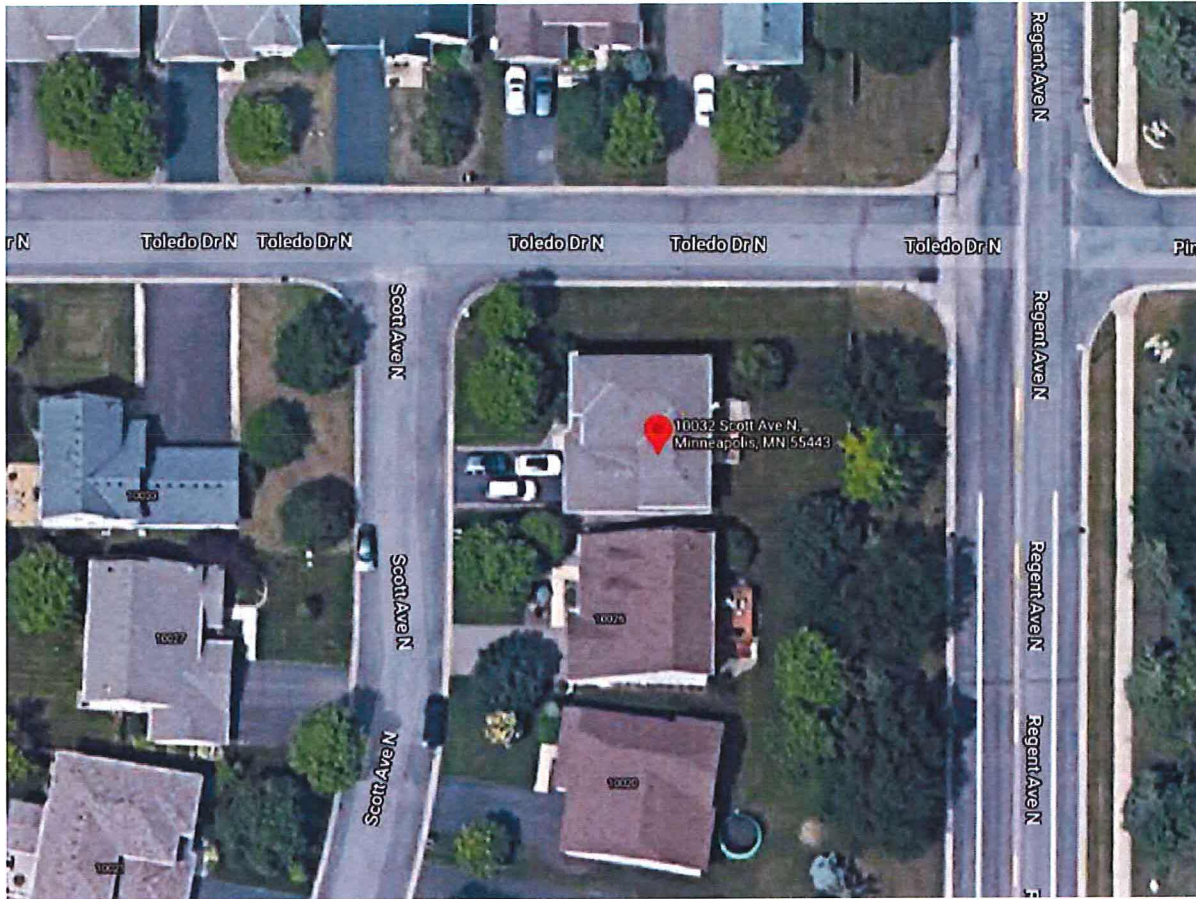
SUBSCRIBED AND SWORN TO before me
by reliable electronic means (FaceTime, Zoom
and/or email) pursuant to Fed. R. Crim. P. 41(d)(3)
on January 13, 2022.

 January 13, 2022

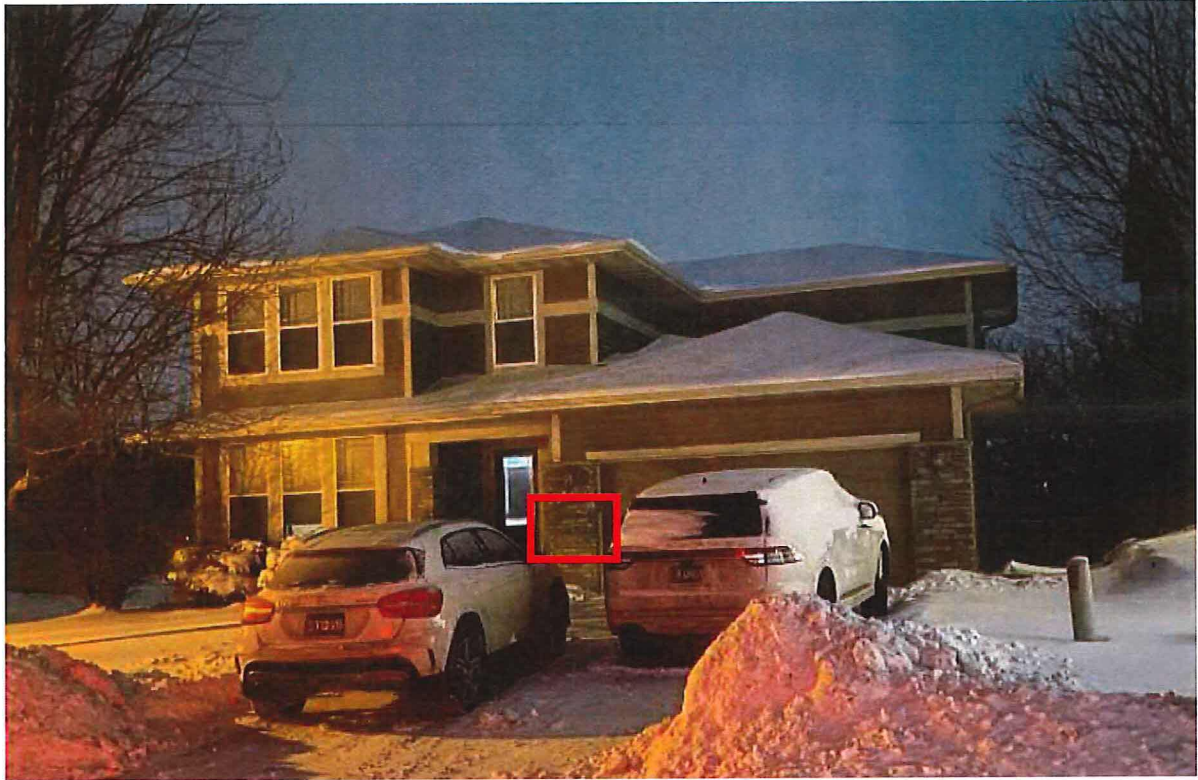
The Honorable Tony N. Leung
United States Magistrate Judge

Attachment A-2

Subject Premises 2 is the single-family home located at 10032 Scott Avenue North, Brooklyn Park, Minnesota 55408. 10032 Scott Avenue North is located on the east side of Scott Avenue, just south of Toledo Drive North.



10032 Scott Avenue North is a two-story house with tan siding. There is an attached garage with a tan garage door located on the right side of the house. The numbers “10032” are written on the house to the left of the garage door.



ATTACHMENT B
(List of Items to be Seized)

Items to be seized include all evidence of violations of Title 18, United States Code, Sections 1341 (mail fraud), 1343 (wire fraud), 1349 (conspiracy), 1956 and 1957 (money laundering), for the period of January 1, 2019 through the present, related to a scheme to fraudulently obtain and misappropriate federal child nutrition program funds, including the following:

1. All documents, correspondence, or information related to participation in federal child nutrition programs, including applications, claims, invoices, records, reimbursements, contracts, site locations, and identification of children served.

2. All correspondence or communication with the Minnesota Department of Education, Feeding Our Future, Partners in Nutrition/Partners in Quality Care, or other entities related to participation in federal child nutrition programs.

3. All personal financial documents, records and information for Qamar Ahmed Hassan, Filsan Mumin Hassan, Ali Mohamed Yusuf, Bekam Merdassa, Sahra Mohamed Nur, Abdiwahab Mohamud, Mohamed Abdishakur Mohamud, and Abdullahe Jesow, including but not limited to the following:

a. Financial records including bank statements, deposit tickets, canceled checks, credit and debit memos, wire transfers, bank money orders, cashier's checks, investment records, stock and bond records, loan records, safety deposit box records, financial statements, tax returns, and records utilized in the preparation of tax returns;

b. Retained copies of personal and business tax returns;

c. Receipts and other documents showing disbursement of funds and ownership of assets, including purchases of real estate and other assets, home improvement, and casino player cards; and

d. Documents showing the location of other records including receipts and contracts for rental units, and change of address or post office box records.

4. All documents, records and information pertaining to S & S Catering Inc., Academy for Youth Excellence, Youth Higher Educational Achievement, Youth Inventor's Lab, Golis Properties LLC, Benadir Hall, Advance Youth Athletic Development, Central Avenue Lofts, Kafi General Trading, or related entities, including but not limited to the following:

a. Accounting records including financial statements, chart of accounts, account ledgers, general ledgers, cash receipt journals, cash disbursement journals, payroll registers, check registers, accounts payable ledgers, accounts receivable ledgers, general journal and overhead rates and calculations;

b. Records that show ownership, control, affiliation, and operation of S & S Catering Inc., Academy for Youth Excellence, Youth Higher Educational Achievement, Youth Inventor's Lab, Golis Properties LLC, Benadir Hall, Advance Youth Athletic Development, Central Avenue Lofts, Kafi General Trading, or any other associated companies, entities, investments, or assets, including but not limited to articles of incorporation, corporate resolutions or minutes, other business or corporate records, memoranda, by-laws, shareholder information, donor information,

service agreements, partnership agreements, memoranda of understanding, and other documents evincing ownership, control, affiliation, and operation.

c. Financial records including bank statements, deposit tickets, canceled checks, credit and debit memos, wire transfers, bank money orders, cashier's checks, investment records, stock and bond records, safety deposit box records, tax returns, and records utilized in the preparation of tax returns;

d. Personnel files and employee information for all employees, volunteers, and/or independent contractors, including, but not limited to, payroll records, time sheets and other records of work performed, applications for employment, background checks, Forms 1099, Forms W-2, and Forms W-4; and

e. Business records including invoices, statements, contracts and agreements, purchase and sale records, records of donations, and correspondence.

5. Property records, receipts, investment records, stock and bond records, mortgages, rental or lease agreements, promissory notes, handwritten notes, calendars, day planners, logs, records related to wire transfers or reflecting financial transactions, and records related to or tending to identify the source, accumulation, disposition, location or ownership of assets, money, wealth, property, safe deposit records, and safe deposit keys.

6. Records reflecting business or personal travel, including passports;

7. All documents identifying potential victim companies, including but not limited to financial records, and business documents.

8. Information that constitutes evidence of meals served to underprivileged children.

9. Cash or cash equivalent, coins, stocks, bonds, gold, jewelry, watches or other proceeds of the fraud offense.

10. Correspondence, memos, reports, notes, and e-mails pertaining to the business and personal financial affairs described above.

11. All documents and records tending to show the identities of associates or co-conspirators, or tending to show the location of assets including notes, telephone messages, telephone numbers, email addresses, address books, and appointment books.

12. Smartphones or cellular telephones, computers, tablet computers, and other digital storage media that may contain any of the records or information described above.

13. Any computer software (and related instructions or manuals) that was used or may have been used to operate the computer hardware listed above, access remote computers, communicate with others, or to manage and record financial transactions, including but not limited to Internet browsers, Internet access software, word processing programs, email software, banking software, business management tools, and accounting software.

14. Any access devices, records, or information needed to open or fully operate the computer hardware or software listed above, including but not limited to

physical keys, account numbers, screen names, passwords, personal identification numbers (PINs), or digital certificates.

15. The terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any electrical, electronic, or magnetic form (such as any information on an electronic or magnetic storage device, including hard disks, ZIPdisks, optical discs, backup tapes, smart cards, memory calculators, personal digital assistants, as well as printouts or readouts from any magnetic storage device); any handmade form (such as writing, drawing, painting); any mechanical form (such as printing or typing); and any photographic form (such as prints, negatives, videotapes, motion pictures, photocopies).

16. Any and all records related to the use of post office boxes, virtual offices, or mail service providers.

17. Items needed to access the information listed above, such as:

- a. Cabinet and desk keys;
- b. Documents and items regarding the rental or use of a storage unit, including contracts, rental agreements, and keys; and
- c. Safe and lock combination and keys.

18. Any digital device capable of storing information related to the commission or attempted commission of the above listed violations, or used to facilitate the above-listed violations, and forensic copies thereof.

19. With respect to any digital-device containing evidence falling within the scope of the foregoing categories of items to be seized:

a. evidence of who used, owned, or controlled the device at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, e-mail, e-mail contacts, chat and instant messaging logs, photographs, and correspondence;

b. evidence of the presence or absence of software that would allow others to control the device, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;

c. evidence of the attachment of other devices;

d. evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the device;

e. evidence of the times the device was used;

f. passwords, encryption keys, and other access devices that may be necessary to access the device;

g. applications, utility programs, compilers, interpreters, or other software, as well as documentation and manuals, that may be necessary to access the device or to conduct a forensic examination of it;

h. records of or information about Internet Protocol addresses used by the device;

i. records of or information about the device's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

20. As used herein, the terms "records," "documents," "programs," "applications," and "materials" includes records, documents, programs, applications, and materials created, modified, or stored in any form, including in digital form on any digital device and any forensic copies thereof.

21. As used herein, the term "digital device" includes any electronic system or device capable of storing or processing data in digital form, including central processing units, desktops, laptops, notebooks, and tablet computers; personal digital assistants; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media, such as hard disk drives, floppy disks, memory cards, optical disks, and magnetic tapes used to store digital data (excluding analog tapes such as VHS); and security devices.

SEARCH WARRANT ADDENDUM

1. In conducting the search authorized by this warrant, the government shall make reasonable efforts to utilize search methodology that avoids searching files, documents or other electronically stored information which is not identified in the warrant.
2. If electronically stored data, information, documents or other records have been identified and seized by the government pursuant to this warrant, the government may retain the electronic storage device (e.g., computer, hard drive, mobile device, smartphone, cell phone). The person from whom the electronic storage device was seized may request that the government provide him or her with electronic copies of the data, information, documents or other records by making a written request to the United States Attorney's Office, identifying with specificity the data, information, documents or other records sought to be copied. The government must respond to all such requests within a reasonable amount of time, and must provide a copy of the electronically stored data, information, documents or other records requested unless the copies requested constitute contraband, instrumentalities, or property subject to forfeiture.
3. Nothing in this warrant shall limit or prevent the government from seizing the electronic storage device as contraband or an instrumentality of a crime or commencing forfeiture proceedings against the electronic storage device and the data contained in the device. Nothing in this warrant shall limit or prevent the owner of the electronic storage device, files, software, hardware, data, information, documents or other records from (a) filing a motion with the Court pursuant to Rule 41(g) of the Federal Rules of Criminal Procedure for the Return of Property, or (b) making a request of the government to return certain specified electronic storage devices, files, software, hardware, data, information, documents or other records.
4. The government shall establish a search methodology governing the review of seized data to ensure that no attorney-client privileged communications will be inadvertently reviewed by the prosecution team. In the event that data seized pursuant to this warrant are identified by the government as possibly containing attorney-client privileged communications, an Assistant United States Attorney, who is not a member of the prosecution team and who is not participating in the search, shall act as a "taint team" to set up an ethical wall between the evidence and the prosecution team that will prevent any privileged material from getting through to the prosecution team.

UNITED STATES DISTRICT COURT
for the
District of Minnesota

IN THE MATTER OF THE SEARCH OF THE
SINGLE-FAMILY HOME LOCATED AT 10032
SCOTT AVENUE NORTH, BROOKLYN PARK,
MINNESOTA 55443, AS FURTHER DESCRIBED
IN ATTACHMENT A-1

SEALED BY ORDER OF THE COURT

Case No. 22-MJ-31 TNL

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the State and District of Minnesota:

See Attachment A-1, incorporated here.

The person or property to be searched, described above, is believed to conceal:

See Attachment B-1, incorporated here.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property.

YOU ARE COMMANDED to execute this warrant on or before January 27, 2022 (not to exceed 14 days)

X in the daytime 6:00 a.m. to 10 p.m. at any time in the day or night as I find reasonable cause has been established.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the current United States Magistrate Judge on duty.

Date and Time issued: January 13, 2022, 4:50 pm

Tony N. Leung
Judge's Signature

City and State: Minneapolis, MN

The Honorable Tony N. Leung
United States Magistrate Judge
Printed Name and Title

Return

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed Name and Title

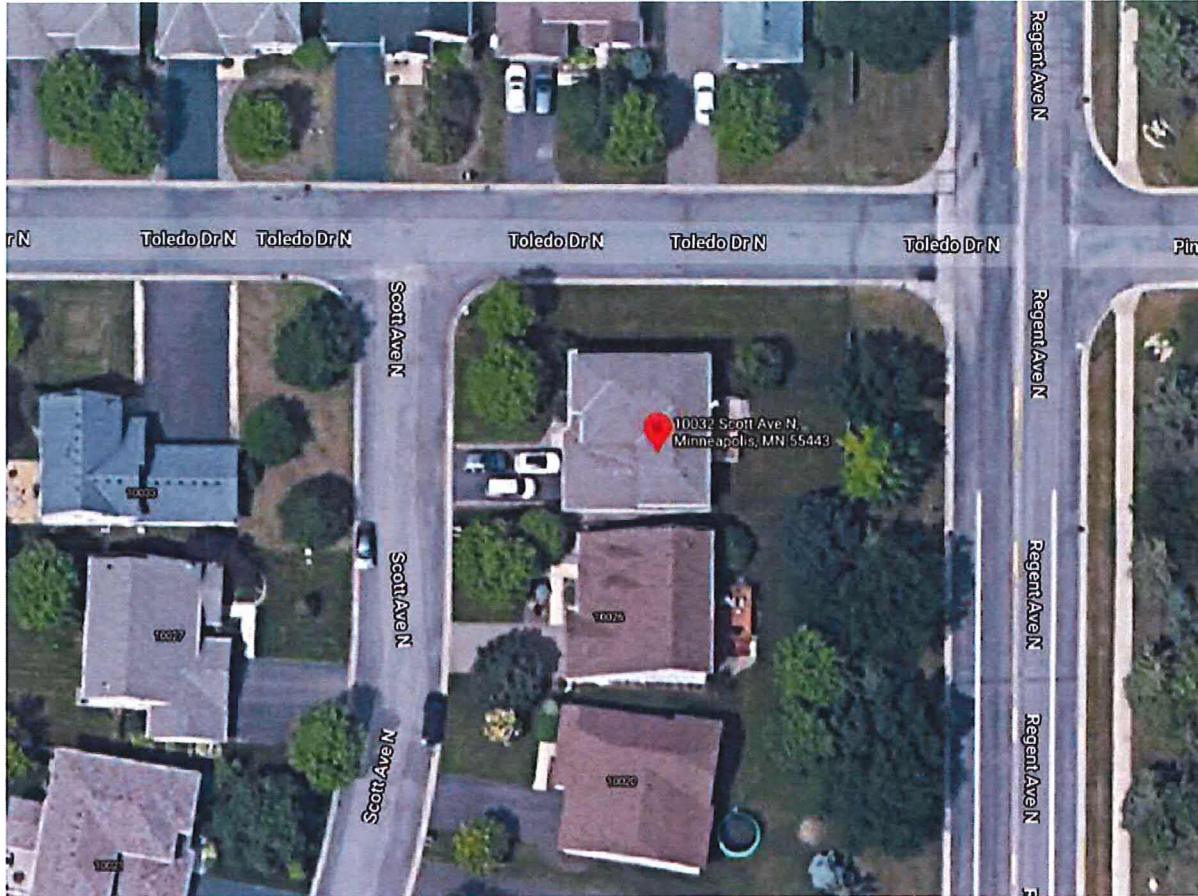
SUBSCRIBED and SWORN before me by reliable electronic means (FaceTime, Zoom and/or email) pursuant to Fed. R. Crim. P. 41(d)(3)

United States Magistrate Judge

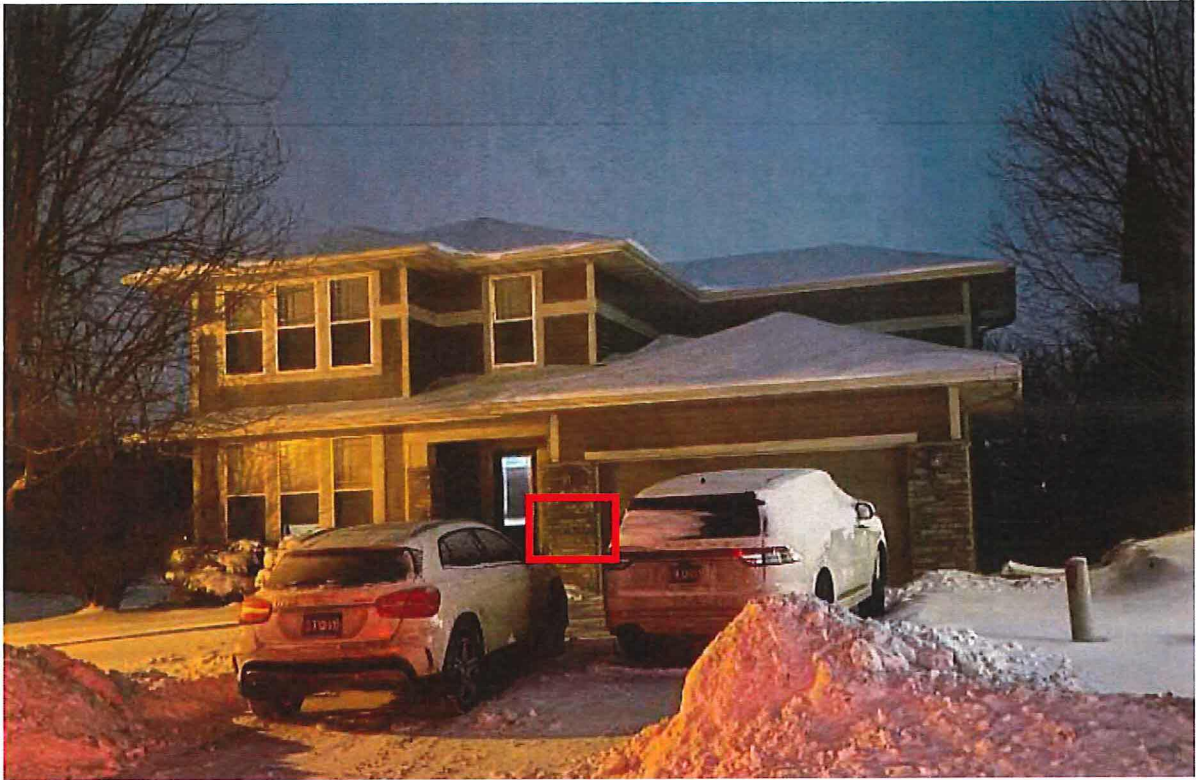
Date

Attachment A-2

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service agreements, partnership agreements, memoranda of understanding, and other documents evincing ownership, control, affiliation, and operation.

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15. The terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any electrical, electronic, or magnetic form (such as any information on an electronic or magnetic storage device, including hard disks, ZIPdisks, optical discs, backup tapes, smart cards, memory calculators, personal digital assistants, as well as printouts or readouts from any magnetic storage device); any handmade form (such as writing, drawing, painting); any mechanical form (such as printing or typing); and any photographic form (such as prints, negatives, videotapes, motion pictures, photocopies).

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19. With respect to any digital-device containing evidence falling within the scope of the foregoing categories of items to be seized:

a. evidence of who used, owned, or controlled the device at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, e-mail, e-mail contacts, chat and instant messaging logs, photographs, and correspondence;

b. evidence of the presence or absence of software that would allow others to control the device, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;

c. evidence of the attachment of other devices;

d. evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the device;

e. evidence of the times the device was used;

f. passwords, encryption keys, and other access devices that may be necessary to access the device;

g. applications, utility programs, compilers, interpreters, or other software, as well as documentation and manuals, that may be necessary to access the device or to conduct a forensic examination of it;

h. records of or information about Internet Protocol addresses used by the device;

i. records of or information about the device's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

20. As used herein, the terms "records," "documents," "programs," "applications," and "materials" includes records, documents, programs, applications, and materials created, modified, or stored in any form, including in digital form on any digital device and any forensic copies thereof.

21. As used herein, the term "digital device" includes any electronic system or device capable of storing or processing data in digital form, including central processing units, desktops, laptops, notebooks, and tablet computers; personal digital assistants; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media, such as hard disk drives, floppy disks, memory cards, optical disks, and magnetic tapes used to store digital data (excluding analog tapes such as VHS); and security devices.

SEARCH WARRANT ADDENDUM

1. In conducting the search authorized by this warrant, the government shall make reasonable efforts to utilize search methodology that avoids searching files, documents or other electronically stored information which is not identified in the warrant.
2. If electronically stored data, information, documents or other records have been identified and seized by the government pursuant to this warrant, the government may retain the electronic storage device (e.g., computer, hard drive, mobile device, smartphone, cell phone). The person from whom the electronic storage device was seized may request that the government provide him or her with electronic copies of the data, information, documents or other records by making a written request to the United States Attorney's Office, identifying with specificity the data, information, documents or other records sought to be copied. The government must respond to all such requests within a reasonable amount of time, and must provide a copy of the electronically stored data, information, documents or other records requested unless the copies requested constitute contraband, instrumentalities, or property subject to forfeiture.
3. Nothing in this warrant shall limit or prevent the government from seizing the electronic storage device as contraband or an instrumentality of a crime or commencing forfeiture proceedings against the electronic storage device and the data contained in the device. Nothing in this warrant shall limit or prevent the owner of the electronic storage device, files, software, hardware, data, information, documents or other records from (a) filing a motion with the Court pursuant to Rule 41(g) of the Federal Rules of Criminal Procedure for the Return of Property, or (b) making a request of the government to return certain specified electronic storage devices, files, software, hardware, data, information, documents or other records.
4. The government shall establish a search methodology governing the review of seized data to ensure that no attorney-client privileged communications will be inadvertently reviewed by the prosecution team. In the event that data seized pursuant to this warrant are identified by the government as possibly containing attorney-client privileged communications, an Assistant United States Attorney, who is not a member of the prosecution team and who is not participating in the search, shall act as a "taint team" to set up an ethical wall between the evidence and the prosecution team that will prevent any privileged material from getting through to the prosecution team.

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 22-MJ-31 TNL

IN THE MATTER OF THE SEARCH OF
THE SINGLE-FAMILY HOME LOCATED
AT 10032 SCOTT AVENUE NORTH,
BROOKLYN PARK, MINNESOTA 55443,
AS FURTHER DESCRIBED IN
ATTACHMENT A-1

**SEALED BY ORDER OF THE
COURT**
PETITION OF THE UNITED
STATES FOR AN ORDER
SEALING SEARCH WARRANT,
AFFIDAVIT, RETURN,
PETITION AND ORDER
FOR SEALING

COMES NOW the United States of America by its undersigned attorneys and in support of its Petition for an Order Sealing Search Warrant, Affidavit, Return, and Petition in the above-captioned matter, states as follows:

1. On January 13, 2022, The Honorable Tony N. Leung issued a warrant authorizing the search of the single-family home located at 10032 Scott Avenue North, Brooklyn Park, Minnesota 55443, as further described in attachment A-1.

2. The Affidavit of Special Agent Travis Wilmer submitted in support of the search warrant, sets forth facts regarding an ongoing investigation into violations of Title 18, United States Code, Sections 1341 (mail fraud), 1343 (wire fraud), 1349 (conspiracy), and 1956/1957 (money laundering).

3. The search warrant documents presented to this Court for *in camera* review include detailed and highly sensitive investigative information. Disclosure of the information would jeopardize an ongoing investigation into alleged criminal offenses and the privacy of individuals unlikely to be, and/or who may ultimately not be, indicted.

4. Nondisclosure of the search warrant documents is necessary to prevent the ongoing investigation from being compromised. Immediate public filing of the search warrant documents would, *inter alia*, compromise details about the nature, extent, and scope of the investigation.

5. The search warrant documents contain identifying information of and circumstances relating to an individual involved in criminal activity in some way who may not be indicted in this case. Nondisclosure of the search warrant documents at this stage is necessary to protect the person's identity and/or to minimize the substantial risk that revelation of details set forth in the search warrant documents could cause to the person's reputation.

6. The Court's power to prevent disclosure of its files, especially for a limited period of time, is well established. This general power has been recognized by the United States Supreme Court.

It is uncontested, however, that the right to inspect and copy judicial records is not absolute. Every court has supervisory power over some records and files and access has been denied where court files might have become a vehicle for improper purposes.

Nixon v. Warner Communications, Inc., 435 U.S. 589, 598 (1978).

7. The Eighth Circuit has recognized the Court's specific power to restrict access to search warrant documents like those at issue here:

We hold that the qualified first amendment right of public access extends to the documents filed in support of search warrants and that the documents may be sealed if the district court specifically finds that sealing is necessary to protect a compelling government interest and that less restrictive alternatives are impracticable.

In re Search Warrant for Secretarial Area Outside Office of Gunn, 855 F.2d 569, 574 (8th Cir. 1988).

8. The Eighth Circuit and district courts within the Circuit have recognized that the circumstances surrounding ongoing investigations constitute compelling government interests warranting the sealing of search warrant documents. For example, the Eighth Circuit has approved sealing search warrant documents that “describe[d] in detail the nature, scope and direction of the government’s investigation and the individuals and specific projects involved,” resulting in “substantial probability that the government’s on-going investigation would be severely compromised if the sealed documents were released.” *Gunn* at 574. Other compelling interests have similarly been recognized as justifying sealing. *Certain Interested Individuals, John Does I-V, Who Are Employees of McDonnell Douglas Corporation v. Pulitzer Publishing Co.*, 895 F.2d 460, 466 (8th Cir. 1990) (“[w]here no indictments have issued against persons allegedly involved in criminal activity, there is a clear suggestion that whatever their truth, the Government cannot prove these allegations. . . . All citizens, whatever their real or imagined past history, are entitled to the protection of a grand jury proceeding.”).

9. Moreover, the Eighth Circuit has recognized that search warrant affidavits permeated with references to individuals other than the subjects of the search warrant and/or with information revealing the nature, scope and direction of the government’s ongoing investigation may be sealed not only because they present compelling government interests justifying sealing, but also because less restrictive

alternatives to sealing are in such circumstances impracticable. *Gunn*, 855 F.2d at 574.

10. Based upon the foregoing and all the files and proceedings to date, the United States respectfully requests that this Court issue an Order Sealing the Warrant, Application, Affidavit of Special Agent Travis Wilmer, Return, this Petition, and the Sealing Order until the close of business on July 13, 2022, unless a compelling interest is shown by the United States for a continuation of the sealing.

Dated: January 13, 2022

Respectfully submitted,

CHARLES J. KOVATS, JR.
Acting United States Attorney

BY: /s/ Joseph H. Thompson
JOSEPH H. THOMPSON
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 22-MJ-31 TNL

IN THE MATTER OF THE SEARCH OF
THE SINGLE-FAMILY HOME LOCATED
AT 10032 SCOTT AVENUE NORTH,
BROOKLYN PARK, MINNESOTA 55443,
AS FURTHER DESCRIBED IN
ATTACHMENT A-1

**SEALED BY ORDER OF THE
COURT**

ORDER FOR SEALING

This Court, having reviewed the Petition of the United States herein, finds that the United States has shown a compelling interest in the sealing of documents in the above-captioned matter because:

- a. Nondisclosure of the search warrant documents is necessary to prevent the ongoing investigation from being compromised.
- b. Nondisclosure of the search warrant documents is necessary to protect the privacy of an individual who may ultimately remain unindicted.

This Court also finds that less restrictive alternatives to sealing are impracticable or not appropriate.

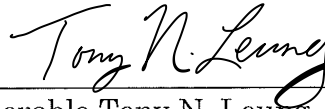
It is therefore:

ORDERED that all documents filed in the above-captioned matter are hereby sealed until the close of business on July 13, 2022.

IT IS FURTHER ORDERED that these documents will be unsealed at the above time unless further compelling interest is shown by the United States for continuing this Order for an additional period of time.

January 13, 2022

Date



The Honorable Tony N. Leung
United States Magistrate Judge