

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.

4. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint charging MOHAMED MUSE NOOR with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Sections 371 and 1343.

5. 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 the requested complaint and arrest warrant, 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 MOHAMED MUSE NOOR has committed conspiracy to commit wire fraud, in violation of Title 18, United States Code, Sections 371 and 1343.

I. PROBABLE CAUSE

A. NOOR is a Target of a Federal Investigation of a Scheme to Misappropriate Millions of Dollars in Federal Child Nutrition Program Funds

6. MOHAMED MUSE NOOR is one of the targets of the continuing investigation into a scheme to fraudulently obtain and misappropriate millions of dollars in federal child nutrition program funds. NOOR and others obtained, misappropriated, and laundered program funds that were intended as reimbursements for the cost of serving meals to children. NOOR and others carried out their scheme by taking advantage of changes in the program intended to ensure underserved children received adequate nutrition during the Covid-19 pandemic. Rather than feed children, NOOR and others exploited the Covid-19 pandemic—and the resulting program changes—to enrich themselves by fraudulently misappropriating federal child nutrition program funds, which they spent for their own personal benefit on such expenditures as vehicles.

7. On the evening of Sunday, September 25, 2022, investigators learned that NOOR booked a flight to Istanbul, Turkey. NOOR's flight is scheduled to depart

Minneapolis-St. Paul International Airport at approximately 8:00 a.m. on September 26, 2022.

B. The Federal Child Nutrition Program

8. This complaint for an arrest warrant relates to an ongoing investigation into a scheme to defraud United States Department of Agriculture (USDA) programs that provide federal funding to nutrition programs for children and low-income individuals across the nation. The Food and Nutrition Service is an agency of the United States Department of Agriculture (USDA) that administers various federal child nutrition programs, including the Summer Food Service Program and Child and Adult Care Food Program (together “the Federal Child Nutrition Program”).

9. The Summer Food Service Program is a federal program established to ensure that children continue to receive nutritious meals when school is not in session. The Summer Food Service Program reimburses non-profit organizations and other participating entities that serve free healthy meals and snacks to children and teens in low-income areas.

10. The Child and Adult Care Food Program is a federal program that reimburses non-profit organizations and other participating entities that serve healthy meals and snacks to children and adults at participating childcare centers, day care homes, and after-school programs.

11. The Federal Child Nutrition Program operates throughout the United States. The USDA’s Food and Nutrition Service administers the program at the national and regional levels by distributing federal funds to state governments, which provide oversight over the Federal Child Nutrition Program.

12. The Minnesota Department of Education (MDE) administers the Federal Child Nutrition Program in Minnesota.

13. Meals funded by the Federal Child Nutrition Program are served by “sites.” Each site participating in the Federal Child Nutrition Program must be sponsored by a sponsoring organization that is authorized to participate in the Federal Child Nutrition Program. Sponsors are required to submit an application to MDE for each site. Sponsors are responsible for monitoring each of their sites and preparing reimbursement claims for their sites.

14. Sponsors submit reimbursement claims to MDE on behalf of sites under their sponsorship. The USDA then provides federal reimbursement funds on a per-meal basis. MDE provides the federal funds to the sponsoring agency, which in turn pays the reimbursement to the sites under its sponsorship. The sponsoring agency retains 10 to 15 percent of the funds as an administrative fee in exchange for sponsoring the sites, submitting reimbursement claims, and disbursing the federal funds.

15. Historically, the Federal Child Nutrition Program has generally functioned by providing meals to children involved in educational-based programs or activities. During the Covid-19 pandemic, however, the USDA 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 programs. At the same time, the state government’s stay-at-home order and telework

policies made it more difficult to oversee the program. These changes left the program vulnerable to fraud and abuse.

C. Feeding Our Future

16. Feeding Our Future was a Minnesota non-profit organization purportedly in the business of helping community partners participate in the Federal Child Nutrition Program. Aimee Bock was the founder and executive director of Feeding Our Future. Feeding Our Future was an approved sponsor of the Federal Child Nutrition Program.

17. Prior to the onset of the Covid-19 pandemic, Feeding Our Future was a small non-profit that sponsored the participation of Minnesota daycares and after school programs in the Federal Child Nutrition Program.

18. Beginning in approximately April 2020, Feeding Our Future dramatically increased the number of sites under its sponsorship as well as the amount of Federal Child Nutrition Program funds received by those sites. Feeding Our Future went from receiving and disbursing approximately \$3.4 million in federal funds to sites under its sponsorship in 2019 to nearly \$200 million in 2021.

19. Aimee Bock oversaw a scheme to defraud, carried out by sites under the sponsorship of Feeding Our Future. Aimee Bock and Feeding Our Future sponsored entities that submitted fraudulent reimbursement claims and fake documentation. In 2020 and 2021, Aimee Bock and her company sponsored the opening of more than 250 Federal Child Nutrition Program sites, knowing that the sites were submitting fraudulent claims.

20. In exchange for sponsoring the sites' fraudulent participation in the program, Feeding Our Future received nearly \$18 million in Federal Child Nutrition Program funds as administrative fees in 2021. Because the amount of administrative fees it received was based on the amount of federal funds received by sites under its sponsorship, Feeding Our Future received millions of dollars in administrative fees to which it was not entitled, due to its sponsorship and facilitation of fraudulent sites participating in the program.

21. In addition to receiving tens of millions of dollars in administrative fees, Feeding Our Future employees solicited and received bribes and kickbacks from individuals and sites under the sponsorship of Feeding Our Future. In effect, Feeding Our Future operated a "pay-to-play" scheme in which individuals seeking to operate fraudulent sites under the sponsorship of Feeding Our Future had to kick back a portion of their fraudulent proceeds to Feeding Our Future employees. Many of these kickbacks were paid in cash or disguised as "consulting fees" paid to shell companies created by Feeding Our Future employees to conceal the true nature of the payments and to make them appear legitimate.

22. On or about September 13, 2022, a federal grand jury returned six sealed indictments charging more than 40 defendants with participating in a scheme to defraud the Federal Child Nutrition Program. Specifically, in *United States v. Bock et al.*, 22 CR 223 (NEB/TNL), Aimee Bock and another Feeding Our Future employee, Abdikerm Abdelahi Eidleh, were among the defendants charged. In addition to being charged with conspiracy to commit wire fraud, both Bock and Eidleh

were also charged with conspiracy to solicit and receive kickbacks in violation of 18 U.S.C. §§ 371 and 666. The indictment alleges that “[e]mployees of Feeding Our Future solicited and accepted bribes and kickbacks from individuals who opened Federal Child Nutrition Program sites under the sponsorship of Feeding Our Future.” The indictment further alleges that “[i]ndividuals who ran sites under the sponsorship of Feeding Our Future paid bribes and kickbacks to Feeding Our Future employees. Many of these bribes and kickbacks were disguised as consulting payments or other legitimate payments to shell companies created by Feeding Our Future employees.”

23. The indictment identified several entities that Eidleh created and used to receive and conceal bribe and kickback payments, including:

- a. Bridge Consulting and Logistics LLC, a company that Eidleh registered on or about November 24, 2020;
- b. Bridge Logistics LLC, a company that Eidleh registered on or about December 4, 2020;
- c. Hope Suppliers LLC, a company that Eidleh registered on or about December 14, 2020; and
- d. Eidleh Inc.

24. A review of bank records shows that Eidleh opened accounts on behalf of these entities and used them to receive more than \$3 million in kickbacks from entities participating in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future.

D. Defendant NOOR and Xogmaal Media Group

25. The investigation has revealed that MOHAMED MUSE NOOR is the cousin of Abdikerm Eidleh. NOOR is also the owner of Xogmaal Media Group, one of the companies that fraudulently received and misappropriated Federal Child Nutrition Program funds.

26. According to its website, Xogmaal Media Group is a “Minneapolis-based Somali marketing, advertising, and communications firm.” The company also appears to operate an online news outlet focused on the Somali community in Minnesota. According to the Minnesota Secretary of State, NOOR incorporated Xogmaal Media Group on or about November 25, 2020. NOOR listed himself as the president of Xogmaal Media Group.

27. On or about November 30, 2020, NOOR opened a bank account in the name of Xogmaal Media Group. Bank records show that NOOR was the lone signatory on the account.

28. Shortly thereafter, NOOR enrolled Xogmaal Media Group as a Federal Child Nutrition Program site under the sponsorship of Feeding Our Future. NOOR and Aimee Bock signed and submitted a site application on behalf of Xogmaal Media Group on or about December 29, 2020. The application claimed that the Xogmaal Media Group site would be located at 2222 Park Avenue in Minneapolis.

29. MDE approved Xogmaal Media Group’s application to participate in the Federal Child Nutrition Program in or about February 2021. On or about February 26, 2021, Aimee Bock sent an email to Feeding Our Future staff with the subject line “App update.” In the email, Bock explained that “Xogmaal Media Group moved to

step 2 of the application” process and instructed Feeding Our Future staff to “Please have them start if they haven’t already.”

App update

From: Aimee Bock <aimee@feedingourfuturemn.org>
To: FOF Office Staff <office@feedingourfuturemn.org>
Date: Fri, 26 Feb 2021 17:15:46 -0600

Xogmaal Media Group moved to step 2 of the application. Please have them start if they haven't already.

—
Aimee Bock
Founder/Executive Director

30. The following day, February 27, 2021, a Feeding Our Future employee sent an email to Aimee Bock expressing concern about sponsoring Xogmaal Media Group and other sites that had no connection to children. The Feeding Our Future employee explained, “We took a lot of organization[s] that don’t work with children or are advocate[s]. I am just realizing that now. For example xogmaal is a TV show program. They have no interest with children. These are the things we need to clean up.”

Xogmaal

From: [REDACTED]@feedingourfuturemn.org
To: Aimee Bock <aimee@feedingourfuturemn.org>
Date: Sat, 27 Feb 2021 11:22:13 -0600

Hello boss.


We took a lot of organization that don't work with children or are advocate, I am just realizing that now. For example xogmaal is a TV show program. They have no interest with children. These are the things we need to clean up.


[REDACTED]
Program Support Staff

31. Aimee Bock responded, “yes, I agree.”

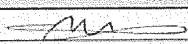
32. Despite these concerns, Aimee Bock allowed Xogmaal Media Group to participate in the Federal Child Nutrition Program under Feeding Our Future's sponsorship. Within weeks of enrolling in the program, NOOR claimed that Xogmaal Media Group was serving meals to 1,000 children a day.

33. For example, on or about February 14, 2021, NOOR submitted an after-school meal count form to Feeding Our Future. The form identified NOOR as the supervisor of the Xogmaal Media Group site. On the form, NOOR claimed that Xogmaal Media Group served supper and a snack to exactly 1,000 children a day. NOOR further claimed that exactly 200 children requested meals after the food was gone each day. The meal count sheet appear to be signed by NOOR. Investigators reviewed the Division of Motor vehicle signature and compared it with the signature on the meal count sheets and they appear to be the same signature.



FEEDING OUR FUTURE




AFTER-SCHOOL MEAL COUNTS – CLICKER

Sponsor	FEEDING OUR FUTURE		Email	aimee@feedingourfuturemn.org		Phone	612.345.4922	
Site	Xogmaal		Supervisor	Mohammed Noor		Week of	2/14/21	
Meal Type	<input checked="" type="checkbox"/> SUPPER				<input checked="" type="checkbox"/> SNACK			
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared	1000	1000	1000	1000	1000	1000	1000	7000
Number of meals from yesterday	—	—	—	—	—	—	—	—
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children	1000	1000	1000	1000	1000	1000	1000	7000
Number of second meals served to children (not reimbursed)	—	—	—	—	—	—	—	—
Number of meals served to program adults (not reimbursed)	—	—	—	—	—	—	—	—
Number of meals served to non-program adults (not reimbursed)	—	—	—	—	—	—	—	—
Number of children requesting meals of food is gone	200	200	200	200	200	200	200	1400
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE	—	—	—	—	—	—	—	—
Number of non-reimbursable, incomplete or damaged meals	—	—	—	—	—	—	—	—
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								
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature						Date	2/14/2021	


34. Similarly, in April 2021, NOOR submitted meal count forms claiming that the Xogmaal Media Group site served supper and a snack to 1,500 children a day, seven days a week, during April 2021. The form identified NOOR as the site supervisor and NOOR’s initials appear on each form to certify that the meal count information was “true and accurate.”


FEEDING OUR FUTURE
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AFTER-SCHOOL MEAL COUNTS – CLICKER

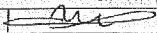
Sponsor	FEEDING OUR FUTURE		Email	amee@feedingourfuturemn.org		Phone	612.345.4922	
Site	Xogmaal Media Group #9000017993		Supervisor	MOHAMED NOOR		Week of	4/18/21	
Meal Type	<input checked="" type="checkbox"/> SUPPER			<input checked="" type="checkbox"/> SNACK				
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared	1500	1500	1500	1500	1500	1500	1500	10500
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	1500	1500	1500	1500	1500	1500	1500	10500
Number of second meals served to children <small>(not reimbursed)</small>	0	0	0	0	0	0	0	0
Number of meals served to program adults <small>(not reimbursed)</small>	0	0	0	0	0	0	0	0
Number of meals served to non-program adults <small>(not reimbursed)</small>	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	0	0	0	0	0	0	0	0
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:	MN	MN	MN	MN	MN	MN	MN	MN
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature						Date	04/18/2021	

35. NOOR continued to claim that the Xogmaal Media Group site was serving meals to 1,500 children a day throughout the summer of 2021. On or about June 11, 2021, NOOR submitted an after-school meal count for the week of June 6, 2021. The form again claimed that Xogmaal Media Group served meals to 1,500 children a day.



FEEDING OUR FUTURE

AFTER-SCHOOL MEAL COUNTS – CLICKER

Sponsor	FEEDING OUR FUTURE	Email	aimee@feedingourfuturemn.org		Phone	612.345.4922		
Site	Xogmaal media	Supervisor	Mohamed Noor		Week of	6-6-21		
Meal Type	SUPPER			SNACK				
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared	1500	1500	1500	1500	1500	1500	—	9000
Number of meals from yesterday	—	—	—	—	—	—	—	—
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children								
Number of second meals served to children (not reimbursed)								
Number of meals served to program adults (not reimbursed)								
Number of meals served to non-program adults (not reimbursed)								
Number of children requesting meals of food is gone								
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE								
Number of non-reimbursable, incomplete or damaged meals								
Number of leftover meals								
Initials of person taking daily meal count certifying that the information is true and accurate	MN	MN	MN	MN	MN	MN	MN	
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature					Date	6/11/2021		

36. Based on these meal counts, Xogmaal Media Group submitted to Feeding Our Future claims for reimbursements from the Federal Child Nutrition Program. For example, in an invoice dated May 31, 2021, Xogmaal Media Group claimed it was entitled to \$285,975 in Federal Child Nutrition Program funds for having served 46,500 meals in May 2021.

10/19/21, 9:58 AM Invoice Template :: Free Printable Invoice :: Skynova.com

From

XOGMAAL MEDIA GROUP
 2222 Park Ave South, Minneapolis, MN
 55407.

To

FEEDING OUR FUTURE
 3055 OLD HIGHWAY 8
 MINNEAPOLIS, MN 55418

INVOICE

Invoice # 603
 Invoice Date 05/31/2021
 Due Date 06/15/2021

Item	Description	Unit Price	Quantity	Amount
Product	BREAKFAST AND LUNCH FOR 31 DAYS OF MAY SERVED AT 1500	6.15	46500.00	285975.00

Notes

Subtotal 285975.00
Total 285975.00
Amount Paid 0.00
Balance Due \$285975.00

37. NOOR and his co-conspirators sent interstate wire transmissions in furtherance of their fraudulent scheme. For example, on or about June 17, 2021, NOOR used a Gmail account to send an email with the subject line “Xogmaal Media Group Food Claim” to a Feeding Our Future employee in Minnesota. The email contained links to several invoices and related documents in support of Xogmaal Media Group’s claim for Federal Child Nutrition Program reimbursements. Based on my training and experience, I know that Gmail servers are located outside of the state of Minnesota.

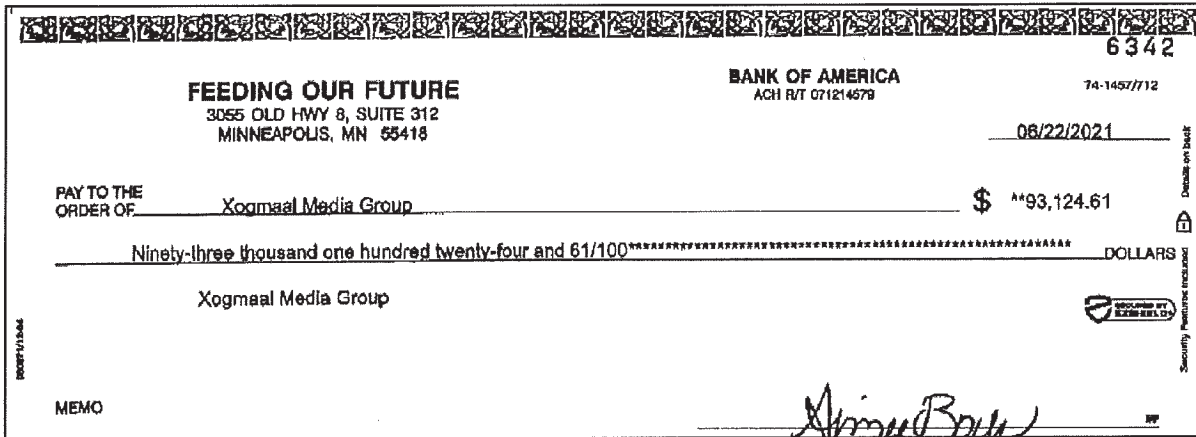
E. Xogmaal Media Group Received Nearly \$500,000 in Federal Child Nutrition Program Funds

38. In all, Xogmaal Media Group received approximately \$494,316 in Federal Child Nutrition Program funds from Feeding Our Future. NOOR deposited these funds into the bank account he opened on November 30, 2020, and for which he was the lone signatory. These deposits represented more than 95 percent of the total deposits into the account.

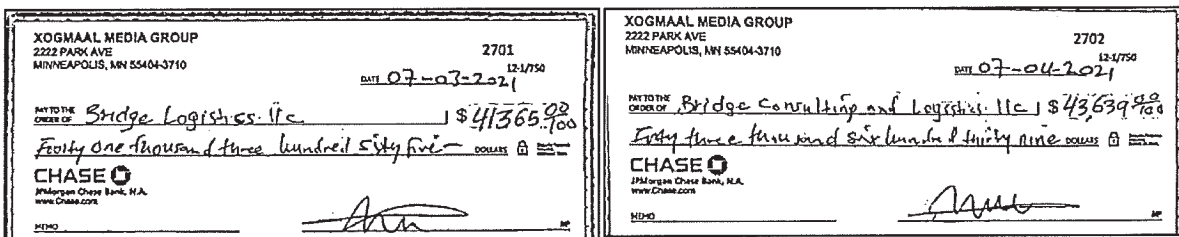
39. Bank records show that Xogmaal Media Group used little, if any, of this money to purchase food or provide meals. Instead, bank records show that Xogmaal Media Group appears to have sent most of the money to shell companies owned by Abdikerm Abdelahi Eidleh, NOOR's cousin and a former Feeding Our Future employee who has been indicted for soliciting and receiving kickbacks from sites participating in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future.

40. Xogmaal Media Group received its first two Federal Child Nutrition Program payments from Feeding Our Future in June and July 2021: (a) approximately \$93,124 on or about June 22, 2021; and (b) approximately \$330,770 on or about July 14, 2021. Bank records show that Xogmaal Media Group transferred approximately \$387,431—approximately 91 percent—of this money to shell companies created and used by Eidleh to receive and conceal kickbacks from sites participating in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future.

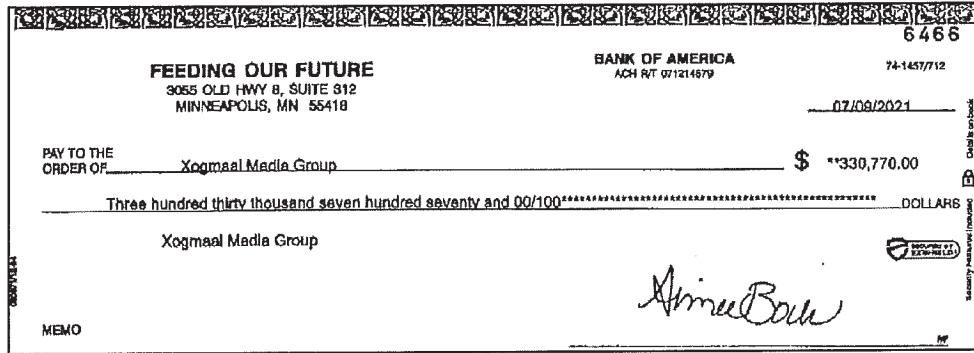
41. On or about June 22, 2021, NOOR deposited a check for \$93,124 into the Xogmaal Media Group account. At the time, the account had an existing balance of approximately \$67.33.



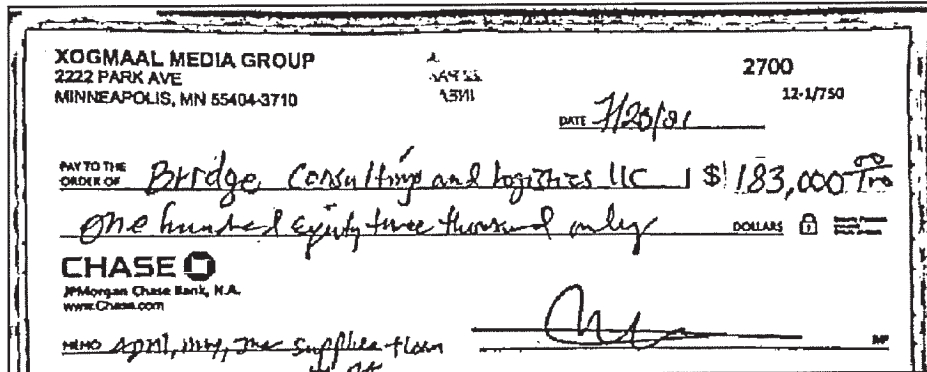
42. Shortly thereafter, NOOR wrote two checks totaling approximately \$85,000 to shell companies created by Eidleh. First, on or about July 3, 2021, NOOR wrote a check for \$41,365 from Xogmaal Media Group to Bridge Logistics LLC. The following day, NOOR wrote another check for \$43,639 from Xogmaal Media Group to Bridge Consulting and Logistics LLC.



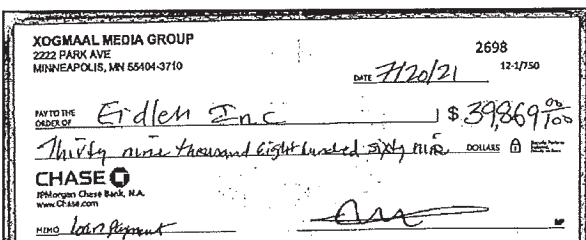
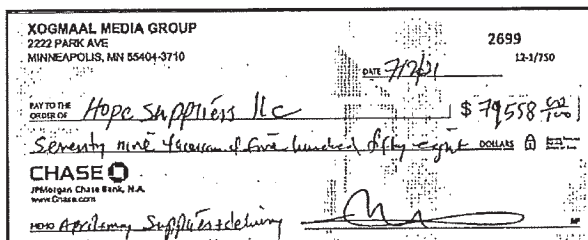
43. On or about July 9, 2021, NOOR deposited a \$330,770 check from Feeding Our Future into the Xogmaal Media Group account.



44. Less than two weeks later, NOOR paid more than \$300,000—or 90 percent—of this money to shell companies owned by Eidleh. On or about July 20, 2021, NOOR wrote a \$183,000 check from Xogmaal Media Group to Bridge Consulting and Logistics LLC. The memo line on the check indicated that the payment was for “April, May, June Supplies + Loan.”



45. That same day, NOOR wrote a \$79,558 check to Hope Suppliers LLC for “April + May Supplies + Delivery” and a \$39,869 check to Eidleh Inc.



46. In all, bank records show that NOOR paid more than \$387,000 in Federal Child Nutrition Program funds from Xogmaal Media Group to entities controlled by Abdikerm Abdelahi Eidleh in July 2021.

Date	Entity	Amount	Memo Line
July 3, 2021	Bridge Logistics LLC	\$41,365	
July 4, 2021	Bridge Consulting and Logistics LLC	\$43,639	
July 20, 2021	Bridge Consulting and Logistics LLC	\$183,000	April, May, June Supplies + Loan
July 28, 2021	Hope Suppliers LLC	\$79,558	April + May Supplies + Delivery
July 20, 2021	Eidleh Inc.	\$39,869	Loan payment
	Total	\$387,431	

47. Bank records show that Eidleh did not use this money (or the money he received from other Federal Child Nutrition Program sites) to provide food or meals to underprivileged children. Instead, he appears to have used much of the funds in the accounts of his various shell companies to fund his lifestyle and enrich himself. For example, he paid approximately \$212,000 towards the mortgage on his home. He also sent approximately \$88,000 to Coinbase.com, an online cryptocurrency exchange, and \$73,000 to an online currency trading brokerage. Bank records show that he spent \$50,000 at a jewelry store in Dubai.

48. Eidleh is currently a fugitive believed to be residing in Mogadishu, Somalia.

II. CONCLUSION

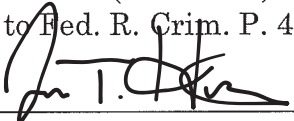
49. Based on the facts set forth above, and based on my training, experience, knowledge, and the aforementioned facts of this investigation, there is probable cause to believe that MOHAMED MUSE NOOR has committed conspiracy to commit wire fraud, in violation of 18 U.S.C. §§ 371 and 1343.

Respectfully submitted,



FBI Special Agent Travis Wilmer

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



The Honorable Jon T. Huseby
United States Magistrate Judge

September 26, 2022