UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
26-mj-6617-Augustin-Birch

FILED BY SM D.C.
Oct 28, 2026
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

UNITED STATES OF AMERICA

v.

AL AMIN,

Defendant.
_____/

CRIMINAL COVER SHEET

1. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023?

2. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024?

3. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024?

4. Did this matter involve the participation of or consultation with Magistrate Judge Yeney Hernandez during her tenure at the U.S. Attorney's Office, which concluded on April 3, 2026?

5. Did this matter involve the participation of or consultation with Magistrate Judge Brandy Brentari Galler during her tenure at the U.S. Attorney's Office, which concluded on July 30, 2026?

Respectfully submitted,

JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY
By: *Joseph A. Cooley*
JOSEPH A. COOLEY
Assistant United States Attorney
Florida Bar No. 966460
500 E. Broward Bouvard, Suite 700
Fort Lauderdale, FL 33394
Tel# (954) 660-5694
Joseph.Cooley2@usdoj.gov

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

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ANGELA E. NOBLE
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United States of America
v.

Al Amin,

Defendant(s)

Case No. 26-mj-6617-Augustin-Birch

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2023 thru March 2026 in the county of Broward in the Southern District of Florida, the defendant(s) violated:

Code Section	*Offense Description*
18 USC § 371	Conspiracy to Obtain Unauthorized Use, Transfer, Acquisition, or Possession of Benefits in violation of 7 USC § 2024(b)(1), and
18 USC § 1349	Conspiracy to Committ Wire Fraud

This criminal complaint is based on these facts:

See Attached Affidavit

☑ Continued on the attached sheet.

Complainant's signature

Sara Gianino, TFO, HSI
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by:
FACETIME

Date: October 27, 2026

Judge's signature

City and state: Fort Lauderdale, FL

Hon. Panayotta Augustin-Birch, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Sara Gianino, being duly sworn, hereby depose and state as follows:

1. I am a Detective with the Lighthouse Point Police Department, Lighthouse Point, Broward County, Florida and have been so employed since November 2021. I am currently assigned as a full-time Task Force Officer ("TFO") with the United States Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI"), Assistant Special Agent in Charge Fort Lauderdale. I am currently assigned to the El Dorado Task Force – South (EDTFS) – financial crimes group and as such am responsible for conducting long-term financial investigations, in fraud, bribery, and money laundering. In my role as a Task Force Officer, I have experience and training in analyzing and gathering financial records, electronic data, and other types of evidence. I have conducted and/or assisted in several financial investigations and have received training in how to conduct such investigations. As a result of my experience and training, I am familiar with the strategies, methods and techniques of fraudsters.

2. This affidavit is submitted in support of a criminal complaint against defendant Al AMIN ("AMIN"). As explained in detail below, I respectfully submit that there is probable cause to believe that, from in or about October 2023 through March 2026, in Broward County, in the Southern District of Florida, and elsewhere, AMIN, did conspire with others known and unknown to unlawfully obtain SNAP benefits in violation of in violation of Title 7 United States Code, Section 2024(b)(1) & 18 United States Code, Section 371 and did conspire

with others known and unknown to commit wire fraud in violation of Title 18, United States Code, Section 1349.

3. The information contained in this Affidavit is based on my personal knowledge as well as information relayed to me by other law enforcement agents and officers involved in this investigation. The information set forth in this Affidavit is provided solely for the purpose of establishing probable cause for the arrest AMIN. As such, it does not include all the information known to me about this investigation.

THE SUPPLMENTAL NUTRITION PROGRAM

4. The Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program, is a federally funded, national program administered by the United States Department of Agriculture ("USDA") through its agency, the Food and Nutrition Services ("FNS"). Its purpose is to alleviate hunger and malnutrition among low-income families by providing "food stamp" benefits. These benefits are provided to recipients through Electronic Benefit Transfer ("EBT") cards, which are similar to debit cards.

5. In Florida, the SNAP is administered by the State of Florida Department of Children and Families (DCF). DCF is responsible for overall program administration, as well as approving, denying or revoking assistance for recipients. FNS and the State of Florida share jointly in the cost of administering the SNAP.

6. Recipients of these benefits use EBT cards to purchase eligible food items at approved retail stores, and the amount of the purchase is then debited

from the recipients SNAP benefit account. Recipients may not use their EBT card to purchase non-food items nor to obtain cash. SNAP recipients are not authorized to sell, trade, or use their benefits other than to purchase eligible food items.

7. Federal SNAP regulations specifically defines *trafficking* as, "The buying, selling, stealing or otherwise effecting an exchange of SNAP benefits issued and accessed via Electronic Benefits Transfer (EBT) cards, card numbers or personal identification numbers (PINs), or by manual voucher and signature, for cash or consideration other than eligible food, whether directly, indirectly in complicity or collusion with others or acting alone" (7 C.F.R. 271.2).

8. Federal SNAP regulations set national standards for eligibility, benefit levels, administration and oversight of the program. These regulations state that, "program benefits may be used only by the household, or other persons the household selects, to purchase eligible food for the household." 7 C.F.A. 274.7(a).

9. DCF contracted with Fidelity National Information Services ("FIS") to process EBT transactions in an accurate and timely manner. To process EBT transactions, a retailer could obtain a government point of sale ("POS") machine or contract with an approved third-party processing company to obtain the POS machine and associated software/equipment. FIS and its subsidiary, eFunds Corporation ("eFunds"), were approved, third party processing companies. FIS servers are in Brown Deer, Wisconsin.

10. Similarly, Conduent serves as a third-party processor for EBT services for various states. Conduent acts as an intermediary that operates the infrastructure needed to securely route, authorize and record EBT transactions. Conduent servers are in Sandy, Utah.

11. In a typical transaction, the cashier at a retail establishment or the recipient would swipe the EBT card through a POS machine. The recipient would then enter his or her Personal Identification Number ("PIN") on a wire keypad to obtain authorization for the purchase. Thereafter, the POS machine would record the USDA-FNS store number, the EBT card number, the date and time of the transaction, and the amount debited from the recipient's card. The retrieved data would be wired and transmitted through the third-party processor to FIS or Conduent for approval, processing, and ultimately, payment to the authorized retailer.

12. Unauthorized access to EBT cards occurs through illicit card skimming or complicit benefit card holders selling their information.

13. 13. Skimming is the illegal installation of devices on or inside ATM's, Point-of-Sale terminals or fuel pumps that capture card data and record PIN entries. Skimming has evolved, as they now employ Bluetooth technology. As nearly all credit cards have gone to the "chip" method, Scammers have pivoted to skimming EBT cards since they still use the magnetic strip.

14. USDAOIG has investigated many skimming cases, in which overlays were placed on POS terminals in various retail locations, in general, these numbers are then re-encoded on to a card with a magnetic strip, via

computer software. The numbers are then either used by the thief or sold via criminal enterprise. When purchasing the cards, they generally sell for half of the amount on the card. E.g. 500 in benefits for 250 dollars. Once skimmed, some criminals do not even reencode the data onto another card, they simply do a "manual entry" at the POS terminal e.g. they type the entire number of the card in, and the pin number.

PROBABLE CAUSE

Overview of Investigation

15. Around November 2024, Homeland Security Investigations El Dorado Task Force South ("HSI EDTFS") received information from the USDA Special Investigations Unit ("SIU") regarding suspected SNAP EBT fraud associated with residential address, 7210 Cody Street, Hollywood, FL 33024 and retailer, 72nd Avenue Food and Grocery LLC, doing business as, Kwik Stop 72 located at 2600 N 72nd Ave, Hollywood, FL 33024. USDA-SIU is a non-sworn regulatory branch that monitors SNAP retailers.

16. The information indicated that 7210 Cody Street and Kwik Stop 72 received a high volume of SNAP EBT transactions and associated deliveries. The purchases were conducted through retailers such as RETAILER 1, RETAILER 2, RETAILER 3 and local grocers.

17. RETAILER-1, an retailer authorized by FNS to accept SNAP benefits on-line and at brick-and-mortar locations operating point-of-sale ("POS") terminals

18. RETAILER-2, primarily an online retailer authorized by FNS to

accept SNAP benefits.

19. RETAILER-3, a retailer authorized by FNS to accept SNAP benefits at point-of-sale ("POS") terminals.

20. Records produced by RETAILER 1 revealed that from October 2023 to February 2025, 7210 Cody Street, Hollywood, FL received approximately 613 purchase orders involving approximately 448 SNAP EBT cards issued by various states in the amount of approximately $442,682.97. These orders included a high volume of energy drink brands such as Monster Energy Drinks, Red Bull, Celsius, as well as other bulk items often seen in a convenience store. Similarly, Kwik Stop 72 received 51 purchase orders involving 47 SNAP EBT cards totaling approximately $15,091.56.

21. Based on this information USDA-SIU, through a contracted private investigator (hereinafter "USDA SOI"), in an undercover capacity, conducted regulatory transactions at Kwik Stop 72. Between November 13, 2024, and February 26, 2025, the USDA SOI visited Kwik Stop 72 approximately 20 times to assess whether the store and its associates were in compliance with SNAP regulations.

22. During these visits, the USDA SOI met Al AMIN, who identified himself as the owner of Kwik Stop 72, M.I., a store clerk, and N.I., an affiliated party.

23. AMIN entered the United States in March of 2018 under a temporary business visitor visa. As of May 22, 2024, AMIN is a legal permanent resident of the United States.

24. Per the Drivers and Vehicle Information Database, AMIN and N.I. have resided at 7210 Cody Street, Hollywood, Broward County, Florida at all times relevant to this investigation.

25. Per DCF databases, AMIN, nor the individuals known to reside at 7210 Cody Street, Hollywood FL, are SNAP benefit recipients.

Transactions Using Fraudulently Obtained EBT Cards

26. On November 15, 2024, USDA SOI inquired if AMIN was interested in purchasing his/her EBT card. AMIN agreed and explained that he typically pays 50 percent of the benefit card's value.

27. In my experience investigating this case, and with speaking with USDA Office of Inspector General ("OIG") criminal investigators, I know that this is the common ratio that benefits are exchanged for cash, e.g. $100.00 in benefits for $50.00 in cash.

28. AMIN, N.I. and M.I. continued to purchase undercover EBT cards from the USDA SOI for half the benefit amount in cash.

USDA SOI meets Al AMIN and Others

29. From November 2024 to June 2025, the USDA SOI met with and sold AMIN, N.I. and M.I. undercover EBT cards, indistinguishable from standard EBT cards, in the amount of approximately $64,388.46. in exchange for $29,474.00 in cash. The undercover cards were swiped approximately 235 times at RETAILER 1, RETAILER 2, RETAILER 3 and other local grocery stores.

30. The EBT cards were utilized to purchase bulk merchandise, primarily energy drink brands such as Monster Energy, Red Bull and Celsius

from various retailers to both stock the convenience store(s) and to sell to other store owners/managers in the area.

31. The USDA SOI documented the following meets with AMIN:

Date	Card(s)	Cash Payment	Total Benefits Trafficked
11/13/2024	N/A	N/A	N/A
11/14/2024	N/A	N/A	N/A
11/15/2024	*3027	$575.00	$1159.90
11/17/2024	*3027	$332.00	$664.74
11/26/2024	*3027 *2954	$837.00	$2476.89
11/27/2024	N/A	$400.00	N/A
11/28/2024	*7861	$160.00	$359.93
12/15/2024	*3027 *2954	$900.00	$2100.17
12/20/2024	*2954	$1900.00	$4243.93
12/22/2024	*2828	$700.00	$1046.75
12/28/2024	*2828	$1200.00	$2479.44
01/03/2025	*8822 *6946	$400.00	$468.58
01/04/2025	*8822 *6946	$600.00	$1715.40
01/05/2025	*8822	$500.00	$809.28
01/12/2025	*2858	$500.00	$1189.32
01/22/2025	*5906	$250.00	$363.05
01/28/2025	*5136	$750.00	$1501.49
02/09/2025	*7906	$360.00	$729.41
02/11/2025	*4083	$120.00	$221.68
02/26/2025	*3512	$940.00	$2926.23

32. N.I. purchased 2 EBT cards from the USDA SOI on November 15, 2025, and November 28, 2025, and utilized benefits in the amount of $1,519.83. M.I. purchased one EBT card from the USDA SOI on November 26, 2024, and utilized benefits in the amount of $1,234.92.

33. The aforementioned cards sold to AMIN, N.I. and M.I. were swiped a total of 111 times at RETAILER 1, RETAILER 2, RETAILER 3 and other local

grocers. For example, on December 20, 2024, USDA SOI met with AMIN and provided EBT card ending in 2954. As pictured below, AMIN purchased $1,573.44 worth of energy drinks and candy boxes at RETAILER 3 located in Miramar, FL.

HSI EDTFS Joined Investigation with USDA SOI

34. Beginning in March 2025, USDA SIU meetings ceased. HSI EDTFS assumed responsibility for coverage and surveillance of the meets. From this point on, the USDA SOI was equipped with a button camera capable of covertly recording audio and video. The following meets took place:

a. On **March 4, 2025**, AMIN met the USDA SOI at Simms Grocery, located at 2243 Simms St., Hollywood, FL, a convenience store managed by AMIN. AMIN provided USDA SOI with a cash payment of $1,500.00, along with a depleted SNAP EBT card from a previous exchange, card number ending in 3512. The USDA SOI provided AMIN 2 pre-loaded undercover EBT cards, card numbers ending in 3706 and 7842 with an available balance of $3,900.00.

i. Transactional data of the undercover cards reveals that EBT card numbers ending in 3706 and 7842 were utilized between March 2, 2025, and March 12, 2025, 8 and 6 times respectively at retail stores in the amount of $3,970.67.

b. On **March 20, 2025**, AMIN and the USDA SOI met at AMIN's residence located at 7210 Cody Street, Hollywood, FL. AMIN provided the USDA SOI cash payment of $1,950.00 and 2 depleted EBT cards (ending in 3706 and 7842) from the previous exchange. The USDA SOI provided AMIN 2 pre-loaded undercover EBT cards; card numbers ending in 3512 and 8026 with an available balance of $5,997.36.

i. Transactional data of the undercover cards reveals that EBT card numbers ending in 3512 and 8026 were utilized between March 20, 2025, and March 27, 2025, 21 and 7 times respectively in the amount of $5,992.84.

c. On **March 31, 2025**, Your Affiant and TFO David Keyes observed AMIN at a self-checkout register at RETAILER 3 located in Miramar, FL with a cart full of Monster Energy and Celsius energy drink cases. Purchase data revealed AMIN utilized EBT card number ending in 3626 for approximately $755.44. The photograph below was captured:

i. Card 3626 is a Florida EBT card belonging to K.B. The card status is currently active and was not reported lost/stolen by K.B. indicating possible complicit sale of the benefit card.

d. On **April 2, 2025**, AMIN met with the USDA SOI at RETAILER 3 in Miramar, FL. AMIN provided cash payment of $3,000.00 and 2 depleted EBT cards from the previous exchange. The USDA SOI provided AMIN 2 pre-loaded undercover EBT cards; card numbers ending in 3706 and 5906 with an available balance of $6,027.19. The USDA SOI accompanied AMIN during a RETAILER 3 transaction, EBT card numbering ending in 3706 was swiped twice at RETAILER 3 in the amount of $1,269.30. The photograph below was captured:

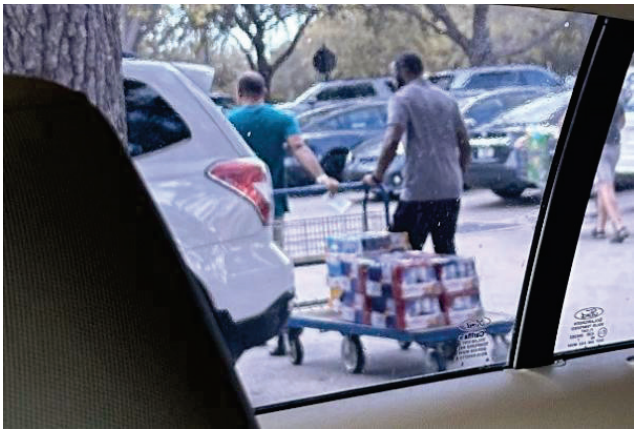
i. Transactional data of the undercover cards reveals that EBT card numbers ending in 3706 and 5906 were utilized between April 2, 2025, and April 9, 2025, 6 and 11 times respectively in the amount of $6,016.39.

e. On **April 16, 2025**, AMIN met the USDA SOI at RETAILER 3 in Miramar, FL. AMIN provided cash payment of $3,000.00 and 2 depleted EBT cards from the previous exchange. The USDA SOI provided AMIN 3 pre-loaded,

undercover EBT cards; card numbers ending in 3512, 8026 and 7842 with an available balance of $10,617.93.

i. Transactional data of the undercover cards reveals that EBT card numbers ending in 3512, 8026 and 7842 were utilized between April 16, 2025, and May 3, 2025, 10, 8 and 7 times respectively in the amount of $10,613.89.

f. On **May 5, 2025**, AMIN met with the USDA SOI at RETAILER 3 in Miramar, FL. AMIN provided cash payment of $5,500.00 and 2 depleted EBT cards (ending in 8026 and 3512) from the previous exchange. The USDA SOI provided AMIN 1 pre-loaded undercover EBT card; card number ending in 5906 with an available balance of $4,004.01. The USDA SOI accompanied AMIN during a RETAILER 3 transaction. EBT card *5906 was used in the amount of $661.72. The photograph below was captured:



i. Transactional data of the undercover card reveal that EBT card number ending in 5906 was utilized between May 5, 2025, and May 7, 2025, 9 times in the amount of $4004.01.

g. On **June 4, 2025**, USDA SOI met with AMIN at 7210 Cody Street, Hollywood, FL. AMIN provided cash payment of $2,000.00 and 1 depleted EBT (*5906) from a previous exchange. The USDA SOI provided 1 pre-loaded,

undercover EBT card; card number ending in 3706 with a total balance of $2,200.00.

i. Transactional data of the undercover cards reveal that EBT card number ending in 3706 was utilized between June 4, 2025, and June 11, 2025, 12 times in the amount of $2,198.59.

h. On **June 11, 2025**, AMIN met the USDA SOI at RETAILER 3 in Miramar, FL. AMIN provided cash payment of $1,100.00. The USDA SOI gave AMIN 1 pre-loaded undercover EBT card; card number ending in 5906 with an available balance of $2,700.00.

i. Transactional data of the undercover cards reveal that EBT card number ending in 5906 was utilized between June 12, 2025, and June 17, 2025, 11 times in the amount of $2,697.72.

i. To this date, AMIN still possesses EBT card numbers ending in 7842 and 5906. A review of transactional records reveal that AMIN utilized card number 7842 from June 27, 2025, to August 24, 2025, in the amount of $1,528.92 at RETAILER 2 and RETAILER 1 instore and online. This was not an authorized nor an arraigned transaction.

35. At the conclusion of each exchange, AMIN would instruct the USDA SOI to send a text message to his phone number 786-252-6089 with details including the respective card's PINs, balance and how much was owed at the next meeting. These communications have been preserved.

36. Additionally, records maintained by DCF reveal that AMIN's phone number (786-252-6089) was utilized approximately 52 times to check EBT card balances for EBT cards belonging to another person. The latest contact with the Florida EBT helpline was recorded on March 22, 2026.

37. To affect these transactions, AMIN, swiped fraudulently obtained EBT cards through POS machines, or by manually entering the EBT card numbers in online sites, thereby transmitting by means of interstate wire communications to FIS/eFunds and/or Conduent an electronic request for authorization of the transaction amounts. FIS servers' area located in Brown Deer, Wisconsin and Conduent servers' area located in Sandy, Utah.

CONCLUSION

WHEREFORE, based on the foregoing, your Affiant submits that there is probable cause to believe Al AMIN and other conspirators known and unknown, from October 2023 to March 2026 in the Southern District of Florida and elsewhere, AMIN, did conspire with others known and unknown to unlawfully obtain SNAP benefits in violation of in violation of Title 7 United States Code, Section 2024(b)(1) & 18 United States Code, Section 371 and did conspire with others known and unknown to commit wire fraud in violation of Title 18, United States Code, Section 1349.

Respectfully Submitted,

SARA GIANINO, TASK FORCE OFFICER
HOMELAND SECURITY INVESTIGATIONS

Attested to by the applicant in accordance with Fed. R. Crim. P. 4.1 in Fort Lauderdale by 27th this_ day of October 2026.

HONORABLE PANAYOTTA AUGUSTIN-BIRCH
UNITED STATES MAGISTRATE JUDGE