

DECLARATION OF HSI TASK FORCE OFFICER SCOTT FINCH

Pursuant to 28 U.S.C. § 1746 and the laws of the United States, I, Scott Finch, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief:

INTRODUCTION

I am a Task Force Officer (“TFO”) of the Department of Homeland Security (“DHS”), under Homeland Security Investigations (“HSI”). I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have been a TFO with the federal government for approximately eight years. I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 18, 19, and 21 of the United States Code.

Prior to my appointment as an ICE-HSI TFO, I was a Senior Special Agent (SSA) with the North Carolina Department of Insurance, Criminal Investigations Division (NCDOI-CID) since 2016 and a local law enforcement officer since 1997. As part of my duties, I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other economic violations. While employed with the NCDOI-CID, I worked along with the North Carolina License and Theft Bureau and the National Insurance Crime Bureau (NICB) in numerous investigations related to illegal chop shops and VIN cloning investigations that led to the arrest and successful prosecution of offenders involved. As a local law enforcement officer, I have assisted in investigations that included



illegal gambling operations as a part of a narcotics investigation. These investigations generally involved illegal poker games held by those involved in other criminal activities.

This Declaration is made in support of the forfeiture of \$57,200.00 in United States Currency seized from FOSTON CURTIS III (CURTIS) on August 9, 2024. The information contained in this declaration is based on personal knowledge I have gained from my participation in this investigation, conclusions I have reached based on my training and experience in the investigation of offenses involving the transportation and receipt of stolen vehicle and gambling offenses and information and statements relayed to me by other HSI Agents, Task Force Officers, and state and local law enforcement officers who are involved in the investigation, reviewed reports of other law enforcement personnel and information provided by other sources. This Declaration is intended to show merely that there is sufficient probable cause for the seizure and forfeiture of \$57,200.00 in U.S. currency and does not set forth all of my knowledge about this matter.

I make this declaration based on evidence that there is sufficient probable cause to believe that CURTIS was involved in the unlawful gambling operation, within the Eastern District of North Carolina and by doing such, committed violations of federal laws, as set forth in Title 18, United States Code, Section 1955 (unlawful gambling operation). Further, the proceeds derived from such unlawful activities and the property involved in any financial transactions executed with the proceeds of the specified unlawful activity are forfeitable pursuant to Title 18, United

States Code, Section 981.

PROBABLE CAUSE

1. HSI Agents and TFO's along with North Carolina Division of Motor Vehicles License and Theft Bureau (NC DMV Theft Bureau) inspectors have been investigating a theft ring that targets high-end Dodge Hellcat vehicles.

2. On August 5, 2024, a North Carolina Highway Patrol trooper was involved in a high-speed chase on Interstate 40 with a stolen black Dodge Hellcat Charger. The vehicle came to a stop after crashing into a pickup truck. The driver, Donovan Michael Curtis (age 19), was arrested and charged in Wake County with possession of a stolen vehicle, felony flee to elude arrest, possession of marijuana, and carrying a concealed weapon, according to arrest record reports in *State of North Carolina v. Curtis.*, File No. 24CRS377313. Agents later learned that on the night of the crash, CURTIS drove to the scene of the accident and retrieved his son Donovan's I-phone.

3. C. Scarboro of the NC DMV License and Theft Bureau searched the Dodge Charger and identified the Public Vehicle Identification Number (VIN) attached to the driver's side dash was VIN 2C3CDXJG1GH160937. The federal decal on the inside of the driver's side door frame also displayed VIN 2C3CDXJG1GH160937. Inspector Scarboro ran the VIN and discovered it was in fact associated with a 2016 Dodge Charger salvage vehicle. According to HSI, salvage vehicles are often purchased for their VIN numbers which are then removed and

placed on stolen vehicles to create “Clones.”* The stolen cars will then be titled and registered under the VINs for the salvage vehicles.

4. C. Scarboro then checked for a secondary VIN on the Charger and located a VIN derivative under the driver's seat carpet-HH514707. He ran the VIN derivative and discovered that the Dodge was a stolen 2017 Dodge Charger “Clone” vehicle with VIN 2C3CDXGJ7HH514707. Records indicate that the 2017 Dodge Charger was stolen in Clayton, North Carolina on July 4, 2024, in Clayton Police Incident/Investigation case number # 2024-0003751.

5. C. Scarboro investigated the salvage/fraudulent VIN 2C3CDXJG1GHI60937 used to clone the stolen Dodge Charger. He discovered that claimant CURTIS purchased the salvage Dodge Charger online from an Insurance Auto Auction (IAA) auto auction on June 25, 2024.

6. According to the Buyer Receipt, CURTIS paid \$3,990.44 for the vehicle via an online PayPal account and listed his address as 7017 Farmdale Rd, Raleigh, NC. C. Scarboro spoke with the IAA branch manager who confirmed that CURTIS bought the 2016 Dodge Charger, and the vehicle was shipped and delivered to 7017 Farmdale Rd, Raleigh, NC.

7. C. Scarboro also obtained a copy of the North Carolina Salvage Certificate of Title for the 2016 Dodge Charger, which lists Foston Curtis III as the

* VIN cloning or car cloning is a practice of using a vehicle identification number (VIN) from a legally registered car to hide the identity of a stolen or salvaged vehicle. The procedure involves replacing the serial plate of a stolen or salvage repaired vehicle with a plate containing the number of a validly registered vehicle of similar make, model and year from another state, province or country.

owner with his 7017 Farmdale Rd address. The Salvage Title also identifies that the 2016 Dodge Charger VIN number is: VIN 2C3CDXJG1GHI60937-the VIN found on the stolen 2017 Dodge Charger driven by Donovan Michael Curtis.

8. C. Scarboro confirmed that CURTIS and Donovan Michael Curtis live at the 7017 Farmdale Rd residence. Thereafter, C. Scarboro obtained a state search warrant to execute on CURTIS's house. On August 9, 2024, agents with HSI, the NC DMV Theft Bureau, and task force officers executed the search warrant at the 7017 Farmdale Rd residence. During the search of the property, agents found the salvage 2016 Dodge Charger that CURTIS had bought from the online auction. The 2016 Dodge Charger was tucked into the woods of the property, hiding from plain view. The VIN and the left front door were missing from the vehicle, which would have contained the federal decal that the manufacturer placed on the vehicle at the factory.

9. Agents also discovered that the 7017 Farmdale Rd property was equipped with a surveillance system. Agents seized (1) the surveillance system hard drives, (2) CURTIS's iPhone, (3) Donovan Curtis's iPhone (picked up from the scene of the crash in the stolen vehicle by CURTIS); (4) a MacBook Air laptop, (5) the 2016 Dodge Charger, (6) and the Ford F-150.

10. Inside of the home, officers found an illegal gambling and alcohol establishment on the lower floor of the residence. Specifically, the downstairs portion of the residence contained several poker tables with cameras in the lights to record the table, along with a full alcohol bar. The agents contacted the North Carolina Alcohol law enforcement, who responded and seized the alcohol and gambling related

items and filed the appropriate state charges related to the operation of an unlicensed alcohol and gambling establishment against CURTIS and his wife, Tamara Welsh, *State of North Carolina v. Curtis, et al.*, File No. 24CR41604. These criminal charges are currently pending in Wake County court and related to operating an unlicensed alcohol and gambling establishment.

11. TFO Finch also asked CURTIS if there was any bulk U.S. currency inside the house. CURTIS said that he had "thousands" in a free standing safe in a downstairs room to the right of the front door. The TFO searched the safe and found several stacks of bulk U.S. currency. A TFO asked CURTIS how he obtained the money, and he said he regularly kept cash because he liked to play cards, and the money was proceeds of playing cards. Tamara Welsh was also present during the interview and immediately spoke up and said the cash was proceeds from the sale of land. CURTIS explained the cash totaled approximately \$57,000.00.

12. An HSI TFO seized the currency due to CURTIS's purchase of the 2016 salvaged Dodge Charger that was recovered on the property with the VIN removed and which was used to create the stolen 2017 Dodge Charger clone. HSI also notes that CURTIS said that the cash was poker proceeds for the games that he held at his house. The official count of the seized currency was \$57,200.00.

13. HSI TFO Finch performed a preliminary search of data from the forensic extraction of the laptop computer owned by CURTIS. The cursory search of this data began with the preview of text files that contained names and numbers. The data obtained from the laptop is approximately 869,844 artifacts. The cursory search

began with text files in an attempt to identify names or numbers that may be associated with the vehicle theft ring. During the search of files TFO Finch identified five or more persons, specifically one poker bar tender, one poker massager, five poker dealers and one poker game cook, accompanied with their names and phone numbers labeled as such in the files. These people either conduct, manage, supervise or direct the gambling operation hosted and housed by CURTIS at his residence located at 7017 Farmdale Rd. A preliminary search of the messages captured from this laptop indicates that CURTIS has been organizing these illegal gambling games in a substantially continuous operation for a period in excess of thirty days over the past three years. A clear correlation to the actions of CURTIS and the elements of Title 18, United States Code, Section 1955 (Unlawful Gambling Operation) was made based on the statements made by CURTIS at the time of the seizure regarding the bulk currency, the charge and arrest of CURTIS by the North Carolina Law Enforcement in the *State of North Carolina v. Curtis, et al.*, File No. 24CR41604 for operating an illegal gambling establishment coupled with the preliminary review of data obtained pursuant to a forensic examination of the laptop seized from CURTIS.

Based on the foregoing, probable cause exists to believe that the aforementioned \$57,200.00 in United States Currency was used or intended to be used in exchange for both stolen vehicles and gambling or represent proceeds of the alleged crimes or was used or intended to be used to facilitate a violation of the alleged crimes. Furthermore, the foregoing facts are sufficient to support a reasonable belief

that the \$57,200.00 is forfeitable to the United States pursuant to Title 18, United States Code, Section 1955 (unlawful gambling operation).

I declare under penalty of perjury that the foregoing information, as known or provided to me, is true and correct.

Respectfully submitted this 20th day of December 2024.

A handwritten signature in black ink, appearing to read "Scott Finch", written over a horizontal line.

Scott Finch
Task Force Officer
Homeland Security Investigations