

3:24-mj-00112

DISTRICT OF OREGON, ss: AFFIDAVIT OF CRAIG ROBINSON

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Craig Robinson, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I have been a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”) since March 2020. I am currently assigned to the Salem Resident Agency in Portland, Oregon, Field Office. I have training and experience in federal criminal law and procedure, interview and interrogation techniques, arrest procedures, search and seizure procedures, computer crimes, evidence identification and collection, including electronic evidence. I have personally been involved in matters concerning white collar crimes, illegal narcotics, gun crimes, and the sexual exploitation of children.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for **Ramaraj Ganesan** (hereinafter **Ganesan**), an Indian male, with date of birth 03/xx/1985, for Conspiracy to Commit Mail and Wire Fraud, in violation of Title 18, United States Code, Sections 371, 1341, and 1343. As set forth below, there is probable cause to believe, and I do believe, that **Ganesan** committed Conspiracy to Commit Mail and Wire Fraud, in violation of Title 18, United States Code, Sections 371, 1341, and 1343.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation,

communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

4. Title 18, United States Code, Section 371, which prohibits a person from conspiring to commit any offense against the United States and for a person involved in the conspiracy to do an act to effect the object of the conspiracy.

5. Title 18, United States Code, Section 1341, which prohibits a person, having devised a scheme to defraud, from obtaining money or property by means of false or fraudulent pretenses, representations, or promises and for the purpose of executing the fraud or attempting to do so places, deposits, or causes to be deposited any matter to be sent or delivered by the Postal Service or any private or commercial interstate carrier.

6. Title 18, United States Code, Section 1343, which prohibits a person, having devised a scheme to defraud, from obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce.

Statement of Probable Cause

7. On May 28, 2024, Adult Victim 1, date of birth 11/xx/1940, contacted the FBI Portland Division, Salem Resident Agency to report that he was a victim of fraud being committed by individuals impersonating FBI Agents. At the time of reporting, Adult Victim 1 had lost approximately \$90,000 as a result of the fraud scheme he fell victim to. Adult Victim 1 resides in Salem, Oregon.

///

8. Adult Victim 1 began being victimized in this fraud scheme after clicking on a pop-up screen on his computer, which in turn froze his computer. A phone number then appeared on the screen, which Adult Victim 1 called, and he was informed that his computer system would be fixed, but that they would transfer him to a Special Agent with the FBI who was investigating the matter. Adult Victim 1 was transferred to an individual claiming to be a Special Agent named Jon Stryker (Stryker). Stryker told Adult Victim 1 that during his investigation, Adult Victim 1 was identified as an individual responsible for a cyber attack that occurred at the FBI Sacramento office, and that he would have to pay reparations for the financial loss of the office or else his assets would be frozen, and he would be arrested. Fearing that he would be arrested and also that he would not have any funds to pay for essential food or medical services for him and his wife, Adult Victim 1 followed the instructions given to him by Stryker. Adult Victim 1 reported that Stryker continuously called Adult Victim 1 from telephone number 786-648-5937, which was a Voice-over IP phone number. I know that Voice-over IP communications (Internet communications) involve communications in interstate and foreign commerce.

9. Adult Victim 1 made three separate payments as directed by Stryker, for a total of \$90,000. Adult Victim 1 sent two payments, via UPS, a private commercial interstate carrier, on March 25, 2024 and May 14, 2024, both equaling \$20,000 in cash. Adult Victim 1 mailed the payments to address that he was provided. The shipping labels were sent to Adult Victim 1 and he was instructed to download and affix them to the packages.

10. Adult Victim 1 made a third payment on April 3, 2024, in the amount of \$50,000 in cash. Adult Victim 1 was called by Stryker and instructed to place the \$50,000 in cash in a

package and one of his “Agents” would come by to pick it up. On April 3, 2024, Adult Victim 1 reported that while he was at home a white car pulled up to and parked in front of his residence and rolled down its rear window. Stryker instructed Adult Victim 1 to place the package in the rear seat, which he did. After Adult Victim 1 placed the package in the car, the car drove off.

11. Stryker later contacted Adult Victim 1 again and instructed him to make an additional payment of \$86,000, that would be picked up on May 28, 2024. Stryker told Adult Victim 1 that one of his “Agents” would drive by Adult Victim 1’s residence to pick up the payment similar to the events that took place on April 3, 2024.

12. After consulting with Special Agents in the Salem Resident Agency, Adult Victim 1 informed Stryker that he would be unable to make the payment that day and would have to reschedule for a later date. Stryker eventually, over the phone, informed Adult Victim 1 that the payment will be picked up on May 30, 2024. In anticipation of the pickup, I put together a decoy package consisting of a USPS box with serial number 93060108.

13. On May 30, 2024, at approximately 8:12 a.m., Adult Victim 1 contacted me and informed me that he received a call from Stryker, telling him that one of his “Agents” would arrive in about 20-30 minutes to pick up the payment of \$86,000. I, along with Detectives with the Salem Police Department, set up surveillance near Adult Victim 1’s residence to identify the vehicle picking up the payment and subsequently conduct a follow that would result in a traffic stop of the target vehicle.

14. At approximately 8:30 a.m., I observed a gray Ford Edge, California license plate 9EVZ778, drive by Adult Victim 1’s residence at in Salem, Oregon. At approximately 8:34 a.m., I observed the same vehicle park in front of Adult Victim 1’s residence and turn its hazard

lights on. I then observed Adult Victim 1 walking to the vehicle with the decoy package and place the decoy package in the rear seat of the vehicle. A photo of Adult Victim 1 placing the decoy package into the target vehicle is below:



15. I observed the vehicle then depart from Adult Victim 1's residence and turn south. After a short follow, a marked patrol unit with Salem Police Department conducted a traffic stop. The driver in the vehicle was identified as **Ganesan**. Inside the vehicle Detectives and Agents observed the decoy package on the rear seat.

16. **Ganesan** provided written consent to search the vehicle. During the search, **Ganesan** informed Agents that there was approximately 36 ounces of gold bars in his backpack and asked for Agents to retrieve them. **Ganesan** informed Agents that the gold bars were from a separate package pick-up that he conducted prior to the pick-up at Adult Victim 1's residence. Agents observed the below gold bars located in his backpack:



17. During the traffic stop, when asked what he was doing, **Ganesan** told Agents and Detectives that he received a call from an unknown number on Tuesday, May 28, 2024, threatening to harm his family unless he picked up a package in Salem, Oregon. **Ganesan** stated that the person booked him a flight and rental car for him. He then later told Agents and Detectives that he also picked up a package containing gold bars from a person outside of Seattle, Washington, prior to driving to Salem. **Ganesan** stated that he intended to drive directly from Salem to the Ventura County Sheriff's Office in California to report all that was going on. When we asked where his family was located so we could help by performing a welfare check on them, **Ganesan** initially declined to tell us where they were and he did not want to worry them. **Ganesan** was transported to Salem Police Department for further interview by me and Special Agent Jess Huckemeyer.

Affidavit of Craig Robinson

18. While at Salem Police Department, **Ganesan** reiterated the story he told during the traffic stop and said that this was the only time he agreed to pick up packages. **Ganesan** also stated that he had not traveled much in the last month, only to San Francisco. When told that we did not believe he was being truthful, that we believed that he had traveled much more often and that this activity had been going on longer than he was claiming, **Ganesan** then admitted that he had been communicating with the individual over the phone since approximately February and admitted to picking up other packages in South Carolina, Florida, Arizona, Utah, and Washington. Inside the vehicle **Ganesan** was driving we found receipts, boarding passes, and other information indicating he had traveled to Florida, New Jersey, South Carolina, Washington, Colorado, and Utah. **Ganesan** stated he would fly to some locations and drive to others, often staying at hotels during his travels. **Ganesan** initially stated that he traveled alone, but then admitted to traveling with other individuals when confronted with information contradicting his initial claim. When we asked **Ganesan** why he did not previously tell law enforcement about the purported threats he told us he did not know.

19. As this investigation has developed, I learned of a similar case being investigated by the FBI Los Angeles Field Office involving FBI impersonators and a fraud scheme involving payment in the form of gold bars. In that case, the victim clicked on a link on his computer, which caused his computer to glitch and a pop-up appear on his screen with a phone number. After calling the phone number, the victim was transferred to an individual claiming to be FBI Special Agent Jon Stryker and he was told the same fabricated story involving the FBI Sacramento office as Adult Victim 1 was told. In the Los Angeles case, Stryker called the victim from telephone number 786-648-5937 and he instructed the victim to purchase \$90,000 in gold

bars and that one of his “Agents” would pick up the payment in the same manner as the “Agent” did with Adult Victim 1. The victim purchased the gold bars and an individual arrived at his residence in a car, the “Agent” rolled down the rear window, the victim placed the package with the gold bars in the rear seat, and the “Agent” drove away.

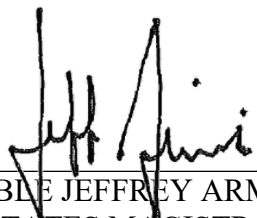
Conclusion

20. Based on the foregoing, I have probable cause to believe, and I do believe, that Ramaraj Ganesan, an Indian male with date of birth 03/XX/1985, committed the crime of Conspiracy to Commit Mail and Wire Fraud, in violation of Title 18, United States Code, Sections 371, 1341, and 1343. I therefore request that the Court issue a criminal complaint and arrest warrant for **Ganesan**.

21. Prior to being submitted to the Court, this affidavit, the accompanying application, and the requested arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Scott Kerin and AUSA Kerin advised me that, in his opinion, the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

By phone pursuant to Fed. R. Crim. P. 41.
Craig Robinson
Special Agent
Federal Bureau of Investigation

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at
4:45 pm on May 31, 2024.



HONORABLE JEFFREY ARMISTEAD
UNITED STATES MAGISTRATE JUDGE