

UNITED STATES DISTRICT COURT
for the
District of South Carolina

In the Matter of the Seizure of
(Briefly describe the property to be seized)
ALL FUNDS, MONIES, AND OTHER THINGS OF
VALUE NOT TO EXCEED \$34,000.00 STORED IN
JP MORGAN CHASE BANK ACCOUNT NUMBER 3
Case No. 2:24-cr-0004

APPLICATION FOR A WARRANT
TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the District of South Carolina is subject to forfeiture to the United States of America under 18 U.S.C. § 981(a)(1)(C) (describe the property):

FUNDS, MONIES, AND OTHER THINGS OF VALUE NOT TO EXCEED \$34,000.00 STORED IN JP MORGAN CHASE BANK ACCOUNT NUMBER 3983622656 OR ANY OTHER ACCOUNT UNDER THE CONTROL OF AND/OR IN THE NAME OF BINGSONG ZHOU

The application is based on these facts:
See Affidavit of USSS Special Agent Iris Joliff, dated December 8, 2023

Continued on the attached sheet.

Iris R. Joliff
Applicant's signature

Special Agent Iris Joliff, USSS
Printed name and title

Sworn to before me and signed in my presence.

Date: December 8, 2023



Mary Gordon Baker
Judge's signature

City and state: Charleston, South Carolina

Hon. Mary Gordon Baker, U.S. Magistrate Judge
Printed name and title

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

IN THE MATTER OF THE SEIZURE
OF ALL FUNDS, MONIES, AND
OTHER THINGS OF VALUE NOT TO
EXCEED \$34,000.00 STORED IN JP
MORGAN CHASE BANK ACCOUNT
NUMBER 3983622656 OR ANY
OTHER ACCOUNT UNDER THE
CONTROL OF AND/OR IN THE NAME
OF BINGSONG ZHOU

Case No. 2:24-cr-0004

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEIZURE WARRANT**

I, Special Agent Iris Jolliff, your Affiant, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Secret Service (USSS) and have been so employed since February 2000. As a Special Agent of the United States Secret Service, I received extensive training at the Federal Law Enforcement Training Center and the James J. Rowley Training Center. This training covered all aspects of financial investigations including counterfeit currency, bank fraud, wire fraud, access device fraud, identity theft, money laundering and asset forfeiture. Throughout my career, I have participated in numerous investigations of violations of criminal law including matters involving fraud and white-collar crime.

2. I am submitting this affidavit in support of an application which seeks the issuance of a federal seizure warrant authorizing agents of the United States Secret Service who are involved in the investigation to seize the below described account:

JP Morgan Chase Bank Account No. 3983622656 or any other account under the control of and/or in the name of Bingsong Zhou (hereinafter referred to as the “Subject Bank Account 1”).

3. Your Affiant has probable cause to believe that the funds in **Subject Bank Account 1**, described above, are unlawful proceeds of violations relating to Title 18 U.S.C. § 1343 (Wire Fraud) and are thereby subject to civil and criminal forfeiture pursuant to Title 18 U.S.C. § 981(a)(1)(C), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). The funds described herein are also thereby subject to civil and criminal seizure pursuant to Title 18 U.S.C. § 981(b) and Title 21 U.S.C. § 853(e) and (f) by Title 18 U.S.C. § 982(b)(1).

4. This affidavit does not purport to set forth all my knowledge or investigation concerning this case. The statements contained in this affidavit are based on my personal knowledge or from information that I have learned during my investigation, including information from financial institutions, witnesses, and others participating in the investigation.

BACKGROUND ON NORTON ANTIVIRUS SCAMS

5. The U. S. Secret Service has observed an increase in reports of phishing scams. Criminals are posing as legitimate representatives of real companies and, through a series of impersonations, are negotiating the transfer of funds via wire transfers from a victim bank account to an account controlled by the criminal. The scams operate, generally, as described below.

6. The criminal sends a phishing email with the subject “Invoice from Norton Antivirus LLC” claiming users owe a certain dollar amount for a Norton Purchase/Renewal. In some instances, the email might even claim that the transaction has already occurred. The email provides a fraudulent phone number and tells the recipient to call to resolve any issues.

7. Once the victim calls the fraudulent phone number in an attempt to cancel the subscription or get a refund for the amount deducted, the scam can take on several forms.

8. Once the criminal receives the fraudulently obtained funds, it is common practice to move the funds rapidly between accounts to prevent law enforcement detection.

FACTS SUPPORTING PROBABLE CAUSE

9. On November 30, 2023, the victim in this case, Anthony Ferrari (“Ferrari”), contacted the U.S. Secret Service (USSS) Field Office located in Columbia, SC and spoke with Special Agent Matthew Hannon. Ferrari explained to Special Agent Hannon that he was a victim of a wire fraud scam. Specifically, Ferrari stated that on November 28, 2023, he wired \$34,000.00 from his South State Bank checking account to an account located at JP Morgan Chase Bank. Special Agent Hannon was able to speak with a representative from both South State Bank and JP Morgan Chase Bank in hopes of reversing the wire but it was too late in the process to conduct a wire reversal. Because Ferrari resides in the USSS Charleston, SC Resident Office district, Special Agent Matthew Hannon contacted me to provide further assistance to the victim.

10. On December 7, 2023, your Affiant spoke with Ferrari regarding this case and he provided the below details:

- a. On November 28, 2023, Ferrari received an email stating in order to cancel his Norton Antivirus subscription, he needed to contact a representative at a telephone number provided in the email.
- b. The subscription showed Ferrari was going to be charged \$349.95 unless he cancelled.
- c. Ferrari called the telephone number provided and spoke with an individual who identified themselves as a representative for Norton.
- d. During the telephone conversation the individual purporting to be the representative requested Ferrari to read a number that he was provided in the email.

- e. Once Ferrari provided the representative with the number from the email, the number allowed the representative remote access into Ferrari's laptop.
 - f. After Ferrari complied with the individual's request, he noticed his laptop screen turned all blue and he could see the cursor moving around in the background.
 - g. At this point, the representative requested Ferrari to check his bank account to make sure the \$349.95 was refunded and deposited into his account. The representative followed up by stating the company accidentally deposited \$34,000.00 instead of the \$349.95 for the refund and Ferrari needed to return the money.
 - h. While still on the phone with the representative, Ferrari then accessed his South State Bank account on his laptop and saw a deposit in his checking account for \$34,000.00.
 - i. The representative instructed Ferrari to go to his bank and send a wire transfer for the \$34,000.00 so he would not get into trouble by keeping money that was not the amount of his refund. Additionally, the representative told Ferrari to keep him on the phone while Ferrari conducted the wire transfer. Further, the representative told Ferrari as to not raise suspicion from his bank he should tell them the wire was for some sort of purchase.
 - j. Continuing on November 28, 2023, Ferrari initiated a wire transfer of \$34,000.00 from his South State Bank Checking account to the **Subject Bank Account 1** with the listed Beneficiary Bingsong Zhou. On the wire instructions he stated it was for the purchase of a vehicle.
11. Unbeknownst to Ferrari, once the representative gained remote access to his laptop, and while Ferrari was in his South State Banking online portal, the representative transferred

\$34,000.00 from Ferrari's own Money Market account to his Checking account. This is the \$34,000.00 that Ferrari ultimately wired to the JP Morgan Chase account under the control of the criminal.

12. On December 7, 2023, I spoke with a representative from JP Morgan Chase who confirmed that JP Morgan Chase had restricted Zhou's access to the funds in all of his accounts he controlled and those funds were moved to a suspense account controlled by the Bank.

13. After speaking with Ferrari and the representative from JP Morgan Chase, it is clear to your Affiant that all communication from the individual purporting to be a legitimate representative of Norton was fraudulent and Ferrari is a victim of wire fraud. Again, as is noted in the above "Background on Norton Antivirus Scams," the above communication is typical of these scams.

14. The **Subject Bank Account 1** in the name of Bingsong Zhou that received the funds from Ferrari does not belong to the legitimate representatives of Norton.

CONCLUSION


15. I submit that this affidavit supports probable cause for a warrant to seize all funds, monies, and other things of value not to exceed \$34,000.00 stored in **Subject Bank Account 1**.

16. Based upon the foregoing facts and upon Affiant's training and experience, there is probable cause to believe that the funds in **Subject Bank Account 1** are proceeds traceable to violations of Title 18 U.S.C. § 1343 and subject to civil and criminal forfeiture to the United States pursuant to Title 18 U.S.C. § 981(a)(1)(C) made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c); and are thereby also subject to seizure pursuant to Title 18 U.S.C. § 981(b) and Title 21 U.S.C. § 853(e) and (f) by Title 18 U.S.C. § 982(b)(1).

17. THEREFORE, your Affiant respectfully requests the issuance of a seizure warrant that will authorize the seizure of funds up to \$34,000.00 in **Subject Bank Account 1**.

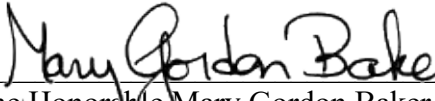
18. This affidavit has been reviewed by AUSA Whit Sowards.

Respectfully submitted,



Iris Jolliff, Senior Special Agent
United States Secret Service

Sworn to me via telephone or other reliable electronic means and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d) or 41(d)(3), as applicable on this the 8th day of December 2023.



The Honorable Mary Gordon Baker
United States Magistrate Judge