

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

WILFORD OSEI,

Defendant.

UNDER SEAL

Case No. 1:25-MJ-16

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Brandon Twentymon, a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an investigative and law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Titles 18, 21, and 26 of the United States Code.

2. I am a Task Force Officer with ATF, assigned to the Strategic Task Force of Narcotics and Guns Initiative in the Washington, D.C. area. During my participation in law enforcement, I have conducted and assisted with arrests, search warrants, and court orders. I have investigated and assisted in investigations involving firearms and other matters, which have resulted in arrests and convictions.

3. The facts and information contained in this Affidavit are based upon my training and experience, participation in investigations, personal knowledge and observations during the course of this investigation, as well as the observations, training, and experience of other agents

and law enforcement officers involved in this investigation. All observations not personally made by me were relayed to me by the individuals who made them or are based on my review of reports, records, documents, videos, and other evidence obtained during the course of this investigation.

4. Because this Affidavit is being submitted for the limited purpose of obtaining a 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 for the issuance of the Complaint and Arrest Warrant.

5. I make this Affidavit in support of an application for a Criminal Complaint and Arrest Warrant for **WILFORD OSEI**. For the reasons set forth below, I submit that there is probable cause to believe that OSEI has committed a violation of 18 U.S.C. § 1029(a)(5) (access device fraud).

PROBABLE CAUSE

6. This case relates to a series of fraudulent purchases and attempted purchases of firearms that OSEI made using other individuals' names and credit card numbers. OSEI made these purchases and attempted purchases without these individuals' authorization. OSEI engaged in this conduct from approximately June through August 2024.

7. OSEI made these purchases and attempted purchases using an online service (hereinafter referred to as the "Online Service"), which is based principally in Utah. The Online Service allows customers to purchase firearms on its website. Once the firearms are purchased, the Online Service ships the firearms to retail federal firearms licensee ("FFL") dealers throughout the United States. The customers visit the retail FFLs in-person, and the FFLs conduct the requisite background checks on the customers to complete the sale and transfer the firearms to the customers.

8. On or around June 2, 2024, OSEI placed an order through the Online Service for a handgun, specifically, a FN Five sevenN MRD 5.7x28mm pistol. OSEI placed this order using the name, address, and credit card number of another person (hereinafter, “Victim-1”). OSEI charged \$1,249.00 to Victim-1’s credit card as part of this transaction. Victim-1 is a resident of Michigan.

9. OSEI placed this order using an email address, telephone number, and IP address associated with him, as subscriber data shows. The IP address that OSEI used to place this order can be traced to a residence in Woodbridge, Virginia, which is within the Eastern District of Virginia.

10. The Online Service completed this order and shipped the FN Five sevenN MRD pistol to a FFL dealer in Woodbridge. A few weeks later, on or around June 24, 2024, OSEI picked up the firearm from the FFL dealer, at which time, OSEI provided his name, signature, and photo identification to the FFL dealer, as part of the FFL dealer’s background-check process.

11. Victim-1’s credit card was later reported stolen. Law enforcement also contacted Victim-1, who stated that he had not made or authorized any firearms purchases online.

12. In at least six instances over the following weeks—on or around June 24, July 5, July 8, July 16, July 17, and August 30—OSEI placed additional firearms orders through the Online Service using the credit cards, names, and billing information of other individuals. These individuals reside throughout the United States, including in states outside Virginia.

13. OSEI placed these orders using the same IP address as the order he placed on or around June 2, 2024. He placed several of them using the same telephone number as the order he placed on or around June 2, 2024.

14. The Online Service blocked or cancelled these orders, and the orders were not fulfilled. In response to several of the blocked or cancelled orders, OSEI placed telephone calls to

customer service representatives of the Online Service. OSEI placed these calls using the same telephone number as the one he provided in connection with the order placed on or around June 2, 2024. These calls were recorded. In two of these calls, OSEI identified his first name as “Wilford” and his initials as “W.O.”

15. The Online Service’s customer service representatives informed OSEI on these calls that the orders had been cancelled because of certain irregularities in the order information. In one call, which was recorded, a customer service representative told OSEI that she was aware that OSEI had called the Online Service using multiple different names in the past. The customer service representative told OSEI that placing orders under the names of different individuals was “fraud.” Nevertheless, after this call, OSEI continued attempting to place firearms orders through the Online Service using the names, credit cards, and billing information of other individuals.

16. I have reviewed credit card statements of the individuals whose names, credit card numbers, and billing information OSEI used to place the above-referenced orders. In multiple instances, the credit card statements show charges to food establishments in Woodbridge, Virginia on or around the dates that OSEI also used the cards to place firearms orders with the Online Service. Most of these food establishments are located near the residence associated with the IP address that OSEI was using.

17. Each of these credit cards was eventually reported stolen, and many of the charges to the Woodbridge food establishments were disputed or reported as fraudulent.

CONCLUSION

18. Based on the foregoing, I submit there is probable cause to believe that on or around June 2, 2024, in Woodbridge, Virginia, within the Eastern District of Virginia, WILFORD OSEI committed a violation of 18 U.S.C. § 1029(a)(5) (access device fraud).

Respectfully submitted,



Brandon Twentymon
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms, and
Explosives (“ATF”)

Subscribed and sworn to me by telephone in accordance
With Fed. R. Crim. P. 4.1 on January 22, 2025

William E. Fitzpatrick

The Honorable William E. Fitzpatrick
United States Magistrate Judge
Alexandria, Virginia