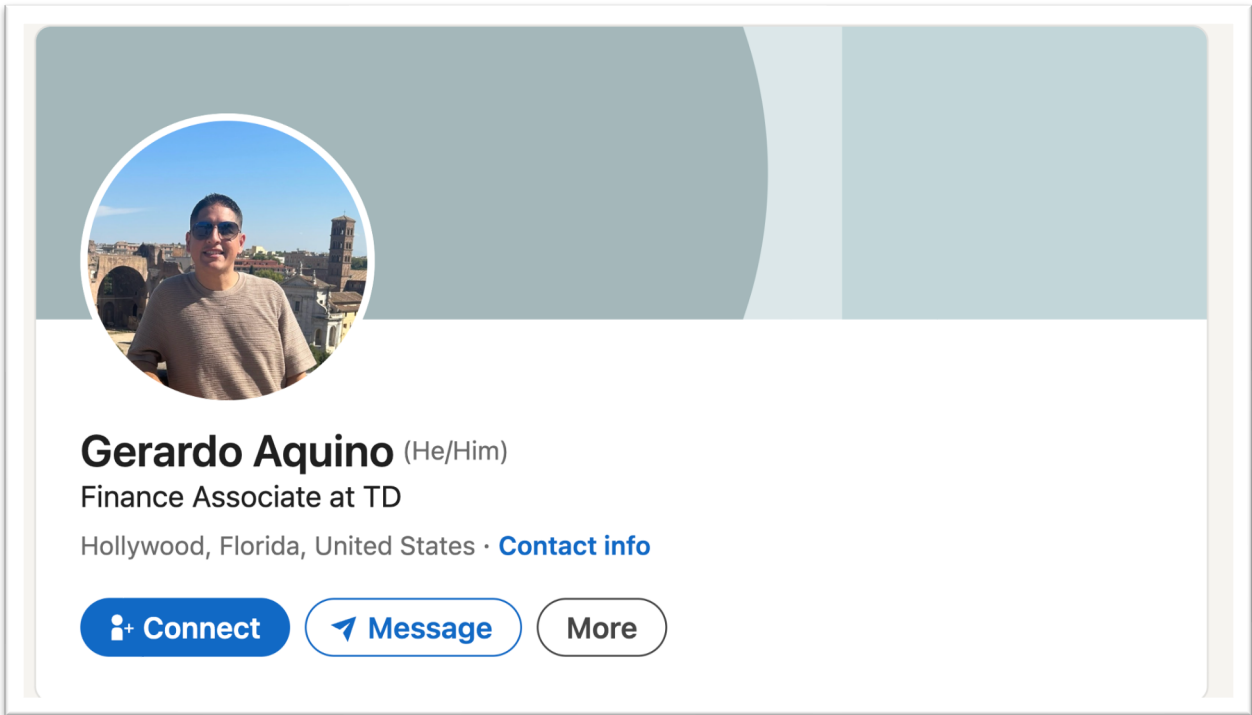


TWO MORE TD INSIDERS IMPLICATED IN INSIDER FRAUD. HOW DEEP DOES THIS GO?



An IRS Investigation is revealing how multiple TD Banking employees helped move millions through shell companies using an army of debit cards.

Leonardo Ayala, who worked as a retail banker at TD Bank's Doral, Florida branch, is accused of exploiting his position to facilitate international money laundering by issuing dozens of debit cards for shell company accounts that were originally opened in New Jersey by another employee **Gerardo Vargas** who accepted bribes for opening at least 28 bank accounts in the names of straw owners who weren't present at the account opening, prosecutors said.



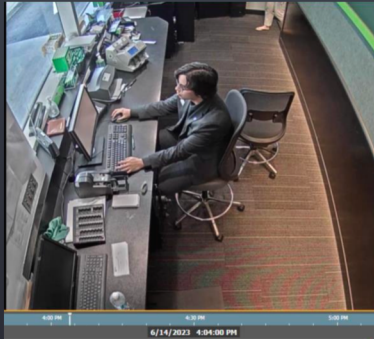
How Ayala and Vargas Ran The Scheme

The scheme, as detailed by Special Agent Nicholas Brancato of the IRS Criminal Investigation division, operated with precision. For example, in June 2023, Ayala received an email requesting him to issue approximately 25 debit cards for a New Jersey-registered shell company account. "Las estoy mandando a la direccion de Nueva Jersey verdad?" ("I'm sending them to the New Jersey address, right?") Ayala allegedly wrote in response, demonstrating his awareness of the operation's mechanics.

The investigation revealed a pattern where shell companies would be established in New Jersey by Vargas with Venezuelan and Colombian nationals listed as nominees. Bank surveillance footage showed Ayala working at his drive-through window terminal while allegedly issuing unauthorized debit cards, which were then mailed to addresses in Plainfield, New Jersey.

One shell company account saw over \$500,000 moved to Colombia via ATM withdrawals between July and September 2023. Another account processed more than \$800,000 in similar transactions from June through November 2023.

Ayala At Work Issuing Fraudulent Debit Cards



Text messages recovered by investigators paint a picture of Ayala's alleged involvement. In one exchange with an associate who warned him about Venezuelan scammers, Ayala responded, "No babe im not dumb... They paid me a large chunk and haven't asked for anything until this weekend." The complaint alleges that Ayala received approximately \$2,250 in payments from one of his co-conspirators through an online money transfer application.

Associate: *Do you want to go to the gym with me tomorrow*

Ayala: *Ima bring a gymbag but i might not be able to go, i have to go pick up more money bc im standing on business, no more helping the venezuelans until my full tabs paid*

Associate: *They still didn't pay you and you kept doing things for them*

Associate: *I told you already babe esos typos no sirven (unofficially translated as "those guys are useless")*

Associate: *Lo mas descarado que ay es un estafador venezolano (unofficially translated as "The most shameless thing there is is a Venezuelan scammer")*

Ayala: *No babe im not dumb*

Ayala: *They paid me a large chunk and haven't asked for anything until this weekend when you saw me texting them*

Ayala: *So im telling them what they gotta have and that i want my bread so tomorrow allegedly they're gonna wire and withdraw the rest of my money*

Associate: *Be careful*

Ayala: *Always baby*

When interviewed by federal agents in November 2023, Ayala demonstrated his understanding of financial crimes, explaining money laundering as "when someone opens a bank account in order to disguise the money moving through the account." Despite this knowledge, and having seen suspicious patterns of "large incoming transfers and then subsequent withdrawals overseas" in accounts he handled, Ayala allegedly continued his involvement in the scheme.

"We identified the activity, reported it, and cooperated closely with authorities in their investigation," a TD spokeswoman said on Wednesday, referring to the charges against Ayala. "We continue to actively support their efforts."

The Other Employee Vargas Worked At TD For A Decade

Gerardo Vargas, worked at TD for a decade. According to Special Agent Nicholas Brancato of the IRS Criminal Investigation division, Aquino's scheme demonstrated a sophisticated understanding of banking systems and their vulnerabilities. Communications detailed in court documents show how Vargas allegedly monetized his position, charging varying rates for his services. "I have Venezuelans, Israelis, Bolivians, all the way to Peruvians, I work with them for much more than \$100," he wrote in one message to a co-conspirator, demonstrating the breadth of his alleged operation.

The investigation uncovered a pattern of digital payments that contradicted Aquino's statements to federal agents. While he claimed to authorities that he "opened these accounts because he is nice and can't say no," financial records tell a different story. Investigators found that in 2023 alone, one co-conspirator transferred at least \$5,600 to Aquino through Zelle payments.

The scheme's sophistication becomes apparent in the pricing structure Aquino allegedly employed. Text messages reveal he typically charged \$200 per account for preferred clients, while charging others between \$500 and \$800 per account. "That \$200 I'm giving you guys, I'm not doing anymore. With other people it's \$500-\$800 per account man. You guys know that you are my thing," Aquino wrote in one message to associates.

When confronted by federal agents in November 2023, Vargas allegedly attempted to minimize his involvement, claiming there was only "one case or a couple of cases" where he opened accounts for absent individuals. This statement, according to investigators, directly contradicted evidence showing he had opened approximately 28 accounts in May and June 2023 alone.

How Much Deeper Does This Go At TD?

At a press conference in October, Attorney General Merrick Garland indicated more charges were coming against individuals allegedly involved in money laundering at TD. “We do expect to see more prosecutions,” Garland said at the time.

ATTACHMENT A

COUNT ONE

(Obstruction of Justice – Grand Jury Proceeding)

In or around November 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

GERARDO FERMIN AQUINO VARGAS,

did corruptly endeavor to influence, obstruct, and impede the due administration of justice, namely, a grand jury investigation being conducted in the United States District Court for the District of New Jersey.

In violation of Title 18, United States Code, Sections 1503 and 2.

ATTACHMENT B

I, Nicholas Brancato, am a Special Agent with the United States Department of the Treasury, Internal Revenue Service, Criminal Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

The Defendant, Relevant Entities, and Overview of the Scheme

1. At all times relevant to this Complaint:
 - a. Defendant Gerardo Fermin Aquino Vargas (“Aquino”) resided in Florida and, from in or around 2012 to in or around November 2023, worked at a branch of an international financial institution (“Financial Institution-A”) in Hollywood, Florida (the “Hollywood Branch”), most recently as a Retail Banker.
 - b. As part of his duties as a Retail Banker, Aquino was the customer liaison for the Hollywood Branch and, as a subject matter expert regarding Financial Institution-A’s products, services, policies, and procedures, assisted new and existing customers with their banking needs.
 - c. Financial Institution-A, one of the largest retail banks in the United States, maintained policies and procedures related to anti-money laundering (“AML”), anti-bribery, and anti-corruption. Pursuant to these policies and procedures, Financial Institution-A prohibited any employee from requesting or receiving anything of value in exchange for influence over that employee’s act or decision. Financial Institution-A also prohibited employees from falsifying accounts, documents, and records. Financial Institution-A provided these policies and procedures to all employees and required employees, including Aquino, to complete annual AML and anti-bribery trainings.
 - d. Financial Institution-A also had policies and procedures regarding onboarding new individual customer accounts. As part of these policies and procedures, a Financial Institution-A representative was required to verify the identity of any individual opening an account.
2. As explained further below, Aquino repeatedly and corruptly accepted bribes from individuals in return for creating accounts at Financial Institution-A in the names of individuals who were not present at account opening and who Aquino knew were not in fact controlling the accounts. In exchange for the bribes, Aquino also provided debit cards associated with each account, online access to the accounts,

and other account services. These accounts were used to transfer millions of dollars from the United States to Colombia, primarily through withdrawals at Automated Teller Machines (“ATMs”) in Colombia. However, when law enforcement interviewed Aquino in or around November 2023, he made multiple false statements, including that he had only opened one or two accounts in this manner and that he had never received payment for such actions.

Victim-1 Accounts

3. In or around April 2022, Aquino began working with a Colombian national (“Co-Conspirator-1”) and others to open fraudulent bank accounts at Financial Institution-A. In return for a fee, Aquino used the names and identification of witting and unwitting foreign nationals to open accounts, which Co-Conspirator-1 and others controlled and used to transfer money from the United States to Colombia. Dozens of accounts Aquino opened in this manner shared a common address in Miami, Florida (the “Common Miami Address”).

4. For example, on or about July 10, 2023, at 9:06:39 AM, Aquino opened two bank accounts at the Hollywood Branch in the name of Victim-1, a 77-year-old Colombian woman. On the account opening forms, Victim-1’s address was identified as the Common Miami Address.

5. The following surveillance screenshot from Financial Institution-A depicts Aquino (at left) on or about July 10, 2023, at 9:06:39 AM, the same day and time that Aquino opened Victim-1’s accounts at Financial Institution-A:



6. That same day, Aquino issued a debit card for each account opened in Victim-1’s name. On or about July 27, 2023, Financial Institution-A froze both of Victim-1’s debit cards due to potentially fraudulent ATM withdrawals in Colombia.

7. On or about August 3, 2023, Co-Conspirator-1 sent Aquino a text message in Spanish¹ requesting help getting multiple Financial Institution-A debit cards unblocked, including the two debit cards associated with Victim-1, which Co-Conspirator-1 identified as a priority. On or about August 3, 2023, in a recorded call, Aquino contacted Financial Institution-A's debit card hotline from the Hollywood Branch and identified several flagged ATM transactions as "valid," resulting in two of Victim 1's debit cards being unblocked and available for continued usage. On or about that same day, Aquino texted Co-Conspirator-1 in Spanish that he had unblocked Victim-1's debit cards.

8. Subsequently, Co-Conspirator-1 and others used the debit cards linked to Victim-1's accounts to purchase airfare from Colombia to the United States in or around September 2023. Co-Conspirator-1 and others provided the Common Miami Address as their personal residence address when purchasing their flights.

9. On or about September 25, 2023, Aquino, with Co-Conspirator-1 present, opened multiple additional accounts on behalf of Co-Conspirator-1 in the names of nominee owners, which accounts were then used to move funds from the United States to Colombia.

Payments from Co-Conspirator-1 to Aquino

10. In or around 2023, Co-Conspirator-1 transferred at least \$5,600 to Aquino through a series of Zelle payments. Aquino received these payments in his personal account held at Financial Institution-A.

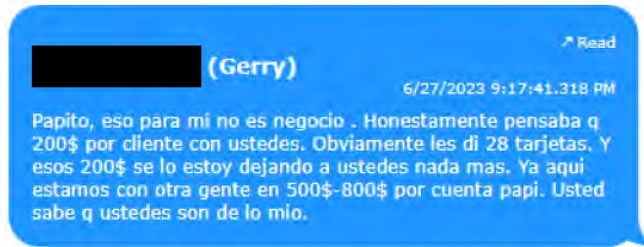
11. According to WhatsApp² conversations between Aquino and Co-Conspirator-1, these payments were in exchange for Aquino opening bank accounts at Financial Institution-A and providing ongoing services like unblocking debit cards. The messages also show that Aquino typically charged Co-Conspirator-1 approximately \$200 per account and that Aquino opened approximately 28 accounts for Co-Conspirator 1 in or around May and June of 2023.

12. For example, on or about June 27, 2023, Aquino, who goes by the name "Gerry," sent the below message to Co-Conspirator-1. In the message, Aquino admitted he gave Co-Conspirator-1 at least 28 debit cards and claimed he charged Co-Conspirator-1 a lower rate per card than what he charged others for a similar service (translated to: "Man, to me this isn't business. Honestly I was thinking \$200 per client with you guys. Obviously I gave you 28 cards. That \$200 I'm giving you

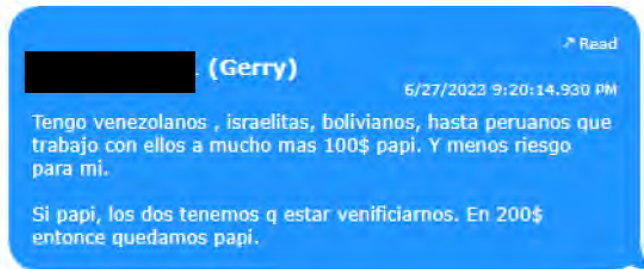
¹ This and other Spanish language messages described herein have been informally translated and summarized by a Spanish-speaking agent for the purposes of this Complaint.

² WhatsApp is an encrypted messaging application.

guys, I'm not doing anymore. With other people it's \$500-\$800 per account man. You guys know that you are my thing.”):



13. A few minutes later, Aquino sent the below message to Co-Conspirator-1 in Spanish confirming he charged \$200 per debit card he provided (translated to: “I have Venezuelans, Israelis, Bolivians, all the way to Peruvians, I work with them for much more than \$100 man. And less risk for me. Yes man, we both have to benefit. So we will stay at \$200 then man.”):



14. On or about July 26, 2023, Co-Conspirator-1 transferred \$2,800 to Aquino through Zelle. The same day, Co-Conspirator-1 sent Aquino a screenshot of the payment confirmation via WhatsApp. Aquino responded, “Gracias,” and sent Co-Conspirator-1 a GIF of martial artist and actor Jean-Claude Van Damme giving a thumbs-up:



First Aquino Interview

15. On or about November 8, 2023, I, along with Special Agent Peter Chartier of the Federal Deposit Insurance Corporation, Office of Inspector General, interviewed Aquino at his home in Hollywood, Florida. During the interview, we informed Aquino that he needed to be truthful, and that lying to federal law enforcement agents could have negative consequences.

16. During the interview, Aquino said in relevant part:
- a. As a Retail Banker, Aquino applied for loans, opened accounts, and applied for credit cards on behalf of customers.
 - b. Customers had to appear in person to open accounts at Financial Institution-A.
 - c. In 2022 or early 2023, a man approached Aquino at Financial Institution-A to open an account and presented a foreign passport that Aquino believed to be the individual's legitimate passport. The same man also asked whether Aquino would open an account for a relative who was currently in Colombia, which Aquino did.
 - d. Aquino was not compensated for opening these accounts; rather, he opened these accounts because he is "nice and can't say no."
 - e. Aquino typically communicated with this individual through WhatsApp.

Second Aquino Interview & Obstruction

17. At all times relevant to this Complaint, a federal grand jury, empaneled in the District of New Jersey, was investigating Aquino's conduct at Financial Institution-A.

18. On or about November 29, 2023, Special Agent Chartier and I spoke with Aquino again, this time by telephone. Special Agent Chartier and I were located in the District of New Jersey at the time of the call.

19. At the outset of the conversation, Special Agent Chartier informed Aquino that the conversation was being recorded; that lying to federal law enforcement agents is potentially a crime; and that the conversation related to an ongoing grand jury investigation in the District of New Jersey and that the information would be relayed to the grand jury.

20. During the ensuing conversation, Aquino made the following materially false statements:

- a. There was “one case or a couple of cases” where Aquino opened accounts in the names of individuals who were not present at the time of account opening.
- b. While he may have opened accounts for individuals that were not present at the time of account opening, Aquino was never paid, including by Zelle or with cash, for doing so.

ATTACHMENT A

COUNT ONE

(Conspiracy to Launder Monetary Instruments)

From in or around June 2023 through in or around November 2023, in Union County, in the District of New Jersey, and elsewhere, the defendant,

LEONARDO AYALA,

did knowingly and intentionally conspire and agree with others to transport, transmit, transfer, and attempt to transport, transmit, and transfer, a monetary instrument or funds from a place in the United States to or through a place outside the United States and to a place in the United States from or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, and knowing that the monetary instrument or funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(a)(2)(B)(i).

In violation of Title 18, United States Code, Section 1956(h).

ATTACHMENT B

I, Nicholas Brancato, am a Special Agent with the United States Department of the Treasury, Internal Revenue Service, Criminal Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

The Defendant, Relevant Entities, and Overview of the Scheme

1. At all times relevant to this Complaint, unless otherwise specified:
 - a. Defendant Leonardo Ayala (“Ayala”) resided in Florida and, from in or around in February 2023 through in or around November 2023, worked as a Retail Banker at a TD Bank, N.A. (“TD Bank”) store in Doral, Florida (the “Doral Store”).
 - b. As part of his duties as a Retail Banker, Ayala was a “customer liaison” for the Doral Store and assisted both new and existing customers with their banking needs.
 - c. TD Bank, one of the largest retail banks in the United States, maintained policies, procedures, and training related to anti-money laundering (“AML”), anti-bribery, and anti-corruption. Pursuant to these policies and procedures, employees of TD Bank were prohibited from requesting or receiving anything of value in exchange for influence over an act or decision. Employees of TD Bank were also prohibited from falsifying accounts, documents, and records. TD Bank provided these policies and procedures to all employees and required employees, such as Ayala, to complete annual AML and anti-bribery training.
 - d. As explained further below, Ayala repeatedly and corruptly issued numerous debit cards for TD Bank accounts originally opened in New Jersey, and had those debit cards mailed to an address in New Jersey, despite knowing that he was being directed to do so by individuals that were not the identified account holder. Those debit cards were then used to launder millions of dollars from the United States to Colombia, primarily through withdrawals at Automated Teller Machines (“ATMs”) in Colombia.

Shell Company-A Account

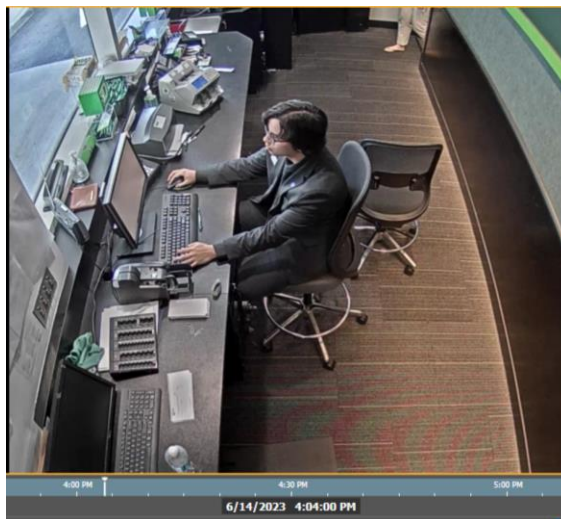
2. On or about June 1, 2023, at the TD Bank store in Scotch Plains, New Jersey (the “Scotch Plains Store”), a TD Bank employee (“Individual-A”) opened a

bank account for a company registered in New Jersey (“Shell Company-A”). On the account opening documents, Individual-A identified a Venezuelan national (“Nominee-A”) as the “Individual with Control” of the account, even though Individual-A knew that Nominee-A would not control the account. TD Bank surveillance video shows that there was no customer with Individual-A when he opened the account for Shell Company-A (the Shell Company-A Account”).

3. On or about June 14, 2023, at approximately 3:59 PM, Ayala received an email at his TD Bank address from a third party, requesting that Ayala issue debit cards for the Shell Company-A Account. In the email, the third party, who was neither the account holder nor the “Individual with Control,” provided Ayala with approximately twenty-five names and corresponding dates-of-birth with which to issue debit cards.

- a. On or about June 14, 2023, at approximately 4:13 PM, Ayala replied, “Las estoy mandando a la direccion de Nueva Jersey verdad?” (unofficially translated as “I’m sending them to the New Jersey address, right?”)
- b. On or about June 14, 2023, at approximately 4:22 PM, the third party responded, “Si claro, por favor las envías a la dirección que está registrada a la cuenta. Gracias[.]” (unofficially translated as “Yes, of course, please send them to the address that is registered to the account. Thank you[.]”)

4. The screenshot below is from the Doral Store’s surveillance video on or about June 14, 2023, at approximately 4:04 PM, when Ayala accessed the Shell Company-A Account in TD Bank’s systems for the first time. Ayala was working at the Doral Store’s drive-through window when he accessed the Shell Company-A Account:



5. Over approximately the next hour, Ayala created approximately 25 debit cards for the Shell Company-A Account. The names and dates-of-birth associated with these debit cards match the information provided in the email described in Paragraph 3, above. When creating these approximately 25 debit cards, Ayala selected the “Mail to Customer” option, resulting in the debit cards being mailed to an address in Plainfield, New Jersey (the “Plainfield Address”). As a result, TD Bank mailed each of the 25 debit cards to the Plainfield Address. All of the debit cards were subsequently activated.

6. From on or about July 7, 2023 through on or about September 7, 2023, the debit cards Ayala issued for the Shell Company-A Account were used to move over \$500,000 from the United States to Colombia via ATM withdrawals.

7. On or about June 15, 2023, the same third party contacted Ayala requesting information about a different account, with a different nominee owner, that had also been opened by Individual-A in New Jersey. Ayala accessed the account in TD Bank’s system and reviewed the customer information and account activity, which included over \$550,000 in ATM withdrawals in Colombia. Ayala then replied, “Esta cuenta esta en estado de bloqueo en este momento, hay una persona asignada a este caso que voy a intentar de contactar para ver que es lo que hace falta para quitar este bloqueo.” (unofficially translated as “This account is blocked at the moment, there is a person assigned to this case that I will try to contact to see what is needed to remove the block.”)

Shell Company-B Account

8. On or about June 7, 2023, Individual-A received an email from a third party at Individual-A’s TD Bank email account with an email address and telephone number. Attached to the email was a Florida company’s (“Shell Company-B”) articles of incorporation, IRS tax identification number, and confirmation of corporate status, as well as copies of a Colombian passport and U.S. visa for the purported beneficial owner, a 77-year-old, female Colombian national (“Nominee-B”).

9. On or about June 12, 2023, Individual-A, at the Scotch Plains Store, opened an account for Shell Company-B. On the account opening documentation, the owner and “Individual with Control” of Shell Company-B was identified as Nominee-B. The documents attached to the email detailed in the previous paragraph were among those included in the account onboarding package. Individual-A opened the account for Shell Company-B (the “Shell Company-B Account”) knowing that it was going to be used to launder money related to illegal narcotics. Individual-A, after opening the account on or about June 12, 2023, never accessed the account again.

10. From the date the account was opened through on or about October 31, 2023, Ayala accessed the Shell Company-B Account in TD Bank’s systems

approximately 15 times, including issuing debit cards for the account on or about June 23, 2023; August 1, 2023; and August 29, 2023.

11. For example, on or about June 23, 2023, at approximately 2:48 PM, Ayala accessed the Shell Company-B Account in TD Bank's system for the first time and issued approximately 25 debit cards for the account.¹

12. Approximately one minute later, at approximately 2:49 PM, Ayala received an email at his TD Bank account from a Venezuelan national known to Ayala ("Individual-B") that included the Shell Company-B Account number and approximately twenty-six names, each accompanied by a date of birth.

13. The screenshot below is from the Doral Store's surveillance video on or about June 23, 2023, at approximately 2:48 PM, the precise time Ayala accessed the Shell Company-B Account to issue debit cards and approximately one minute before he received the email from Individual-B identifying the debit card recipients for the Shell Company-B Account. Ayala is shown at the computer, wearing a suit, while Individual-B is in the lower righthand corner:



14. From on or about June 29, 2023 through in or around November 2023, the Shell Company-B Account was used to move over \$800,000 from the United States to Colombia via ATM withdrawals.

15. Individual-B also transferred money directly to Ayala. For example, between on or about September 28, 2023 and November 7, 2023, using an online money transfer application, Ayala received five payments from Individual-B totaling approximately \$2,250.

¹ Over the course of the two other sessions in or around August 2023, Ayala issued approximately 14 more debit cards linked to the Shell Company-B Account.

16. On or about October 25, 2023, shortly after receiving an approximately \$400 payment from Individual-B, Ayala exchanged the following texts with an associate:

Associate: *Do you want to go to the gym with me tomorrow*

Ayala: *Ima bring a gymbag but i might not be able to go, i have to go pick up more money bc im standing on business, no more helping the venezuelans until my full tabs paid*

Associate: *They still didn't pay you and you kept doing things for them*

Associate: *I told you already babe esos typos no sirven (unofficially translated as "those guys are useless")*

Associate: *Lo mas descarado que ay es un estafador venezolano (unofficially translated as "The most shameless thing there is is a Venezuelan scammer")*

Ayala: *No babe im not dumb*

Ayala: *They paid me a large chunk and haven't asked for anything until this weekend when you saw me texting them*

Ayala: *So im telling them what they gotta have and that i want my bread so tomorrow allegedly they're gonna wire and withdraw the rest of my money*

Associate: *Be careful*

Ayala: *Always baby*

Ayala Interview

17. On or about November 20, 2023, law enforcement interviewed Ayala in Doral, Florida. During the interview, law enforcement informed Ayala that he needed to be truthful, and that lying to federal law enforcement agents is a crime.

18. During the interview, Ayala said, among other things:

- a. At both TD Bank and a prior financial institution, Ayala received trainings on money laundering, bribery, and other types of financial crime.
- b. Ayala explained that money laundering is when someone opens a bank account in order to disguise the money moving through the account, and bribery is getting paid to open bank accounts, either in the form of gifts above \$25 or money of any value.

- c. Ayala recalled seeing account activity at TD Bank, including in accounts that he opened, that included large incoming transfers and then subsequent withdrawals overseas. He described this type of activity as “money laundering.”
- d. Ayala acknowledged that he knows Individual-B and had exchanged messages with him on social media, but stated that he had never been paid in exchange for influence over an act or decision at TD Bank, including by Individual-B.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre
:
v. : Mag. No. 24-13291
:
LEONARDO AYALA : **SEALING ORDER**

24-MJ-4531-REID

Upon application of the United States Attorney for the District of New Jersey (by Mark J. Pesce, Assistant United States Attorney), for an order sealing the Complaint, arrest warrant, and all supporting papers in the above-captioned matter, and good and sufficient cause having been shown,

IT IS on this 9th day of December, 2024,

ORDERED that the Complaint and all supporting papers in the above-captioned matter be sealed, except for such copies of the arrest warrant, Complaint, or supporting papers, if any, that are needed to effectuate its purpose, until the arrest warrant is executed or until further order of the Court.

IT IS FURTHER ORDERED that, once the arrest warrant is executed, the Complaint, arrest warrant, and this Order be and are hereby unsealed.

/s/ Hon. Leda Dunn Wettre
HONORABLE LEDA DUNN WETTRE
United States Magistrate Judge