

14-0079-AF10

BS13-07-03241

**IN THE COUNTY/CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA**

STATE OF FLORIDA,

Plaintiff,

Vs.

AFFIDAVIT TO ARREST

Karen Cypress, W/F, 07/26/1988 Defendant,

BEFORE ME, Judge of the Circuit Court in and for Broward County, personally came Detective Ronald Faircloth of the Broward County Sheriff's Office who after being duly sworn, deposes and says that on the 3rd day of June, A.D. 2013 through the 9th day of June A.D. 2013, in the County and State aforesaid, one Karen Cypress, W/F 07/26/1988 did then and there unlawfully

Alberto Delgado and Karen Cypress did engage in a scheme constituting a systematic, ongoing course of conduct with intent to defraud one or more online auction sites, or to obtain property from one or more online auction sites by false or fraudulent representations, or promises, and did obtain property from one or more of such online auction sites.

On July 18, 2013 I was contacted by eBay Investigator Jeff McGuire regarding Alberto Delgado and Karen Cypress. Investigator McGuire advised me that eBay had been the victim of a scheme that caused a loss of \$52,585.29 to their company. He explained that this scheme was acted out between June 3, 2013 and June 11, 2013 by Alberto and Karen and he provided me with records outlining the history and the activity of what these suspects did. According to those records, on May 24, 2010 Alberto opened up an eBay account under the address of 2415 Lincoln Street # 106, Hollywood, FL. The email address that was associated with that account was chinodelgado27@gmail.com. Then on June 7, 2010 he opened up a PayPal account, which is owned by eBay, using the same physical address and the same email address. The bank account that was on file for his PayPal account was a Bank of America account, account number [REDACTED] and check card number [REDACTED]. Additionally, with these accounts there was a phone number that was attached of (954) 534-6277. From June 10, 2010 through April 16, 2013 there were a total of 55 purchases that were made through this PayPal account with an average transaction amount of under \$150. Most of these items were inexpensive items such as auto parts and clothing, with high-priced items sporadically purchased. All of these transactions were purchased through PayPal without any issues. On June 3, 2013 Alberto began making a large amount of high dollar transactions with total transaction attempts of \$54,412.78 by June 9, 2013. Below is a breakdown of the daily purchase amounts.

Date	Total Transactions	Total Amount
June 3, 2013	22	\$18,401.01
June 4, 2013	31	\$6,090.34
June 5, 2013	34	\$11,578.65
June 6, 2013	8	\$8,693.84
June 7, 2013	4	\$7,749.94
June 9, 2013	1	\$1,899.00
Totals	100	\$54,412.78

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Upon speaking with Investigator McGuire, he advised me that these transactions were processed as instant wire transfers. He further explained that these types of transactions can take approximately 3 days or longer to get the funds from the bank. Additionally, these transactions are processed by an automated system. Once the system is notified by the bank that the account does not have sufficient funds to process the transactions, PayPal's system automatically attempts to bill the backup payment source that is on file for the account. In this case, that would be the check card that is attached to Alberto's PayPal account. It can then take a couple of more days for the bank to notify PayPal that the transactions are being denied. Based on an automated algorithm that checks the account history to determine if the transactions could be fraudulent, the Fraud Department is automatically notified. On June 8, 2013 PayPal's Fraud Department sent an email to the on file address that was listed above for Alberto. This email was to notify the account holder that their PayPal account had been restricted due to unusual activity. In order to rectify this, PayPal requests that the account holder submit a copy of their identification, proof of address, and proof of the on file bank accounts to make sure that they are who they say they are and that the accounts are valid and the transactions have been authorized by the account holder. Also on June 8, 2013 Alberto sent a photograph of his driver's license and bank records that confirmed his identity, address, and bank account. That same day, he was advised that the restrictions had been lifted from his account. It should also be noted that on that day, 4 phone calls were placed to PayPal and that the ANI (Automated Number Identifier) System showed that the calls came in from the phone number on Alberto's account. On June 9, 2013 two additional transactions were initiated on eBay through his PayPal account; these transactions were in the amounts of \$1,899.00 and \$840.25. They were made between 16:33:05 hours and 17:09:39 hours. At approximately 21:01:38 hours PayPal sent another email to Alberto's on file address and advised him that a restriction had been placed on his account. This was done because PayPal received notification from Bank of America that the account that they had been trying to charge had insufficient funds. On this day, 3 phone calls were made to PayPal that was identified by the ANI System as being the numbers on Alberto's account. In the first phone call, the caller requested that the restrictions were released. The phone operator placed in their notes that due to the dollar amount they were requesting that the Fraud Department handle it. In the second phone call the operator noted that the caller was requesting that the funds be released. After the third phone call, the operator advised the caller that they were waiting for the payments to process before they would release the holds on the account. Also on June 9, 2013 the account owned by Karen Cypress attempted to make a \$400 purchase from the same computer on the same IP address that Alberto had been using. Karen's eBay account had first been opened on March 14, 2013 with the physical address of 5648 Arthur Street in Hollywood, FL and the email address of momma0811@gmail.com. The PayPal account had been opened one day prior on March 13, 2013 with the same email address and physical address, as well as the physical address of 5609 Taylor Street in Hollywood, FL. Additionally, this PayPal account had a JP Morgan Chase bank account attached to it of [REDACTED] and a check card number of [REDACTED]. The first phone number that was on this account was (954) 248-7759. A second phone number was added on July 7, 2013 of (954) 699-6920. After PayPal discovered that Karen was utilizing the same computer and same IP address, they sent her an email on July 2, 2013 similar to what they had sent to Alberto. On July 6, 2013, in response to PayPal trying to clear up the restrictions on her account, Karen sent them a photograph of her FL driver's license and Chase bank account letter confirming both of her addresses on file with her account. Additionally, she provided an image with her bank account numbers that confirmed the Chase bank account that was attached to her PayPal account. PayPal received a phone call from the phone number of (954) 699-6920 claiming to be Karen and requested that her appeal be reviewed as soon as possible. They advised her that the first image was not clear and asked her to re-send it, which she did. On July 18, 2013 PayPal denied her appeal to release the restrictions on her account based on the letter that she had sent in stating "Insufficient Funds Notice" at the bottom. As part of his investigation, Investigator McGuire provided a photograph that was obtained from Facebook. In this photograph it shows Alberto and Karen sitting on a couch together. I verified that this photograph was present on Karen's Facebook page (<http://www.facebook.com/karen.cypress.7>) in her publicly accessible photographs. I also located Alberto's Facebook page (<http://www.facebook.com/EASTSIDECHINO>) and discovered that he was listed as "friends" with Karen.

On August 1, 2013 I received the phone records from Sprint for the phone numbers that were associated with

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Karen's eBay and PayPal accounts. Upon reviewing those phone records, I found that both phone numbers were in the name of Dakota Cypress with an address in Hollywood of 6481 Mary Osceola Drive Apartment C2. I checked Karen's Facebook page and found that she had Dakota listed as one of her friends. The email address on the account, however, was momma0811@gmail.com, the same email address that PayPal communicated to Karen through and the email address that she listed on those accounts.

I compared the phone records and searched for Alberto's number of (954) 534-6277 that was listed on his eBay and PayPal accounts. Upon doing so, I found that on the phone records for (954) 248-7759 between April 1, 2013 and June 9, 2013 there were a total of 307 incoming or outgoing phone calls and incoming and outgoing text messages. I also checked (954) 699-6920 and found that there were a total of 226 incoming and outgoing phone calls and incoming and outgoing text messages. This shows that Karen and Alberto know each other and communicate more frequently than just acquaintances. I also verified the phone calls that eBay stated they had record of someone claiming to be Karen calling from the (954) 699-6920 phone number. Below are the phone calls that were made from that phone number:

Date	Time	Verified	Dialed Number	Call Duration
July 6, 2013	18:56:47	Yes	(888) 221-1161	9:55
July 6, 2013	20:05:03	Yes	(888) 221-1161	6:05
July 6, 2013	20:11:47	Yes	(888) 221-1161	11:12

According to PayPal records, on July 7, 2013 a female called from Karen's cell phone number of (954) 699-6920 and claimed that she was Karen. She asked that her PayPal account be re-instated as soon as possible because "she was planning on making a lot of purchases on eBay and needed her account.

On August 6, 2013 I received the subpoenaed phone records from AT&T for the phone number that was listed on Alberto's eBay and PayPal accounts. Upon reviewing those phone records, I first looked at the subscriber information and found that the phone was registered to Alberto Delgado with a date of birth of 12/31/1991 and a Social Security Number of [REDACTED]. The physical address and the email address that were associated with the AT&T account were the same addresses on file with eBay.

I examined the phone records to determine if there were outgoing calls made from Alberto's phone on the dates and times that eBay and PayPal showed that his number called in on his account. I found that of the 8 phone calls that registered on his account, 7 of them I was able to verify on his phone account. The last 2 phone calls on June 11, 2013 were made seconds apart, so it appears as though there was a connection issue as the eBay records show that the first phone call failed to authenticate.

Date	Time	Verified	Dialed Number	Call Duration
June 8, 2013	13:06:04	Yes	(888) 215-5506	6:11
June 8, 2013	16:24:28	Yes	(888) 215-5506	5:47
June 8, 2013	22:53:40	Yes	(888) 215-5506	16:15
June 9, 2013	15:47:45	Yes	(888) 215-5506	15:24
June 9, 2013	19:39:44	Yes	(888) 215-5506	1:07
June 9, 2013	19:40:45	Yes	(888) 215-5506	16:04
June 11, 2013	12:55:06	No		
June 11, 2013	12:55:29	Yes	(888) 215-5506	6:13

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I found some additional information while looking through his phone records. I discovered that he had called a number of toll free numbers during the time period that he started placing orders on eBay through June 11, 2013. There were a few of those numbers that were of interest. Below is a list of the phone calls that were of interest:

Date	Time	Number	Company	Incoming/Outgoing
June 3, 2013	14:48:00	(800) 683-7800	Seminole Tribe	Outgoing
June 6, 2013	10:06:00	(800) 933-6262	Bank of America	Outgoing
June 8, 2013	1:14:00	(888) 537-5503	Wal-Mart Gift Card Check	Outgoing
June 8, 2013	11:49:00	(888) 345-7940	Finish Line Gift Cards	Outgoing
June 11, 2013	14:45:00	(800) 683-7800	Seminole Tribe	Outgoing
June 11, 2013	13:53:00	(866) 762-8327	Bank of America	Incoming
June 11, 2013	13:59:00	(866) 762-8327	Bank of America	Outgoing
June 11, 2013	14:05:00	(866) 762-8327	Bank of America	Outgoing
June 11, 2013	16:00:00	(877) 411-2232	Lou Bachrodt (Cars)	Outgoing
June 12, 2013	22:40:00	(888) 237-8289	Best Buy Customer Service	Outgoing
June 13, 2013	14:15:00	(800) 344-7779	USPS	Outgoing
June 13, 2013	15:58:00	(800) 463-3339	FedEx	Outgoing
June 13, 2013	15:59:00	(800) 463-3339	FedEx	Outgoing
June 13, 2013	21:16:00	(800) 344-7779	USPS	Outgoing
June 14, 2013	11:30:00	(800) 344-7779	USPS	Outgoing
June 14, 2013	23:24:00	(800) 435-9792	Southwest Airlines	Outgoing
June 14, 2013	23:25:00	(800) 435-9792	Southwest Airlines	Outgoing
June 18, 2013	20:49:00	(800) 511-2752	Bloomingdale's	Outgoing
June 18, 2013	20:51:00	(800) 511-2752	Bloomingdale's	Outgoing
June 18, 2013	20:51:00	(800) 511-2752	Bloomingdale's	Outgoing
June 19, 2013	0:30:00	(888) 345-7940	Finish Line Gift Cards	Outgoing
June 19, 2013	0:35:00	(888) 345-7940	Finish Line Gift Cards	Outgoing
June 19, 2013	0:36:00	(888) 345-7940	Finish Line Gift Cards	Outgoing
June 24, 2013	18:33:00	(888) 943-7956	Wheel Agora (Rims)	Outgoing
June 26, 2013	17:15:00	(800) 652-1111	Bank of America	Outgoing
June 26, 2013	17:18:00	(800) 652-1111	Bank of America	Outgoing

As can be seen above, there are a number of retail establishment phone numbers listed such as, Wal-Mart, Finish Line, BestBuy, Southwest Airlines, and Bloomingdale's. These are of interest because they match the eBay records for some of the gift cards that were purchased and some of the phone numbers are the actual gift card balance phone numbers, such as the Wal-Mart and Finish Line numbers. Additionally, there were a number of phone calls to USPS and FedEx in the days following all of the online eBay orders that would have been mailed. The number listed under Lou Bachrodt is a number that was found on Craig's List for an individual named Patrick. There was a photograph of a vehicle for sale parked in front of Lou Bachrodt. Further investigation into Alberto's D.A.V.I.D. information revealed that he acquired a 2012 Chevrolet Suburban on June 18, 2013, just after all of these purchases. It should be noted that the other 2 vehicles registered to Alberto are a 1981 Chevrolet and a 1998 Honda. Then there are the calls to Bank of America, which is the bank that was listed on Alberto's eBay and PayPal accounts. Additionally, there were numerous calls made to the

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Seminole Tribe and it has been discovered that Karen is Native American.

On August 12, 2013 I received the results from my Comcast subpoena to identify the owner of the leased IP address, 174.48.28.55, which was used to conduct all of these purchases. According to Comcast records, the IP address was leased to Karen Cypress at 5648 Arthur Street in Hollywood. They further advised that this IP address is dynamically assigned as opposed to a static IP address. A dynamic IP address is subject to change as needed, where as a static IP address is permanently assigned to a single subscriber. I requested the records for the above IP address between June 3, 2013 and June 9, 2013. According to Comcast records, this IP address was assigned to Karen Cypress for the duration of that period.

Also on that date, I reached out to BestBuy Asset Protection Fraud Analyst, Paula Wilson, to see if there were any transactions that were conducted by Karen or Alberto. On August 14, 2013 Paula advised me that there were orders placed utilizing gift cards. She advised me that one of the orders was completed online and it was shipped to 5648 Arthur Street in Hollywood, the same address for Karen's residence and her Comcast account; that order was placed on June 12, 2013. The gift card that was used for that purchase was [REDACTED] which was a \$50 gift card that BestBuy was able to link as being purchased from a Kohl's store in Carrollson, TX on June 4, 2013. According to their records, there were 6 \$50 gift cards purchased from that Kohl's store on June 4, 2013 at the same time. The eBay listing was for \$300 in BestBuy gift cards. Additionally, the records for that online BestBuy purchase list that it was to be shipped to Alberto Delgado at 5648 Arthur Street. The total for that online purchase was \$42.39, leaving just over \$7 left on the card. According to the eBay records, there were two transactions for BestBuy gift cards; one for \$300 and one for \$250. The one for \$250 was shipped on June 6, 2013 via USPS with a tracking number of 9400109699938534442560. Upon checking that tracking number in the USPS website it showed that the shipment delivered on June 10, 2013 in Hollywood, FL. The eBay records indicate that the gift card was shipped to 2415 Lincoln Street # 106 in Hollywood. The \$300 gift card was also shipped to that address on June 5, 2013 with a tracking number of 9402109699939984569850 via USPS. I also checked the USPS website for the tracking information and discovered that it was delivered on June 7, 2013 to Hollywood, FL and signed for by R. Rescigno.

There was another purchase made at the BestBuy in Pembroke Pines on June 12, 2013 at 21:10 hours. This purchase was for a pre-order of a PS3 game, Grand Theft Auto 5. The customer information was supplied for this transaction, since it was a pre-order. That information that was provided was Alberto Delgado at 2415 Lincoln Street # 106 in Hollywood, FL and an email address of chinodelgado27@gmail.com. The total for that purchase was \$59.99 and there were 2 gift cards used for the purchase; [REDACTED] for \$39.92 and [REDACTED] for \$20.07.

Based on those 2 transactions listed above, we can link the other cards to Alberto as well. Just minutes before the in store purchase on June 12, 2013 there was another purchase made at the BestBuy in Pembroke Pines utilizing the card ending in [REDACTED] listed above. That transaction was for \$110.08 and there were 3 of the 6 \$50 gift cards used for that purchase including the one ending in 2645. The other 2 were [REDACTED] for \$50 and [REDACTED] for \$50. There was another transaction on June 25, 2013 at the BestBuy in Aventura for a total purchase amount of \$168.77. For that transaction there were 4 gift cards utilized; the one ending in [REDACTED] mentioned above for \$29.93, [REDACTED] for \$50, [REDACTED] for \$7.61, and [REDACTED] for \$81.23. That card ending in [REDACTED] had an original balance of \$250 which is the exact amount of the other eBay BestBuy gift card purchased from Alberto's account. The last transaction was conducted on July 24, 2013 at the BestBuy in Pembroke Pines for a total of \$105.99. The \$250 gift card ending in [REDACTED] was used for this purchase leaving a balance on the card of \$62.78. Based on all of these transactions, that links all 6 \$50 gift cards and the \$250 gift card to Alberto.

Also on August 14, 2013 I drove past the 3 addresses associated with Alberto and Karen in Hollywood. When I located the 5648 Arthur Street address, I observed Alberto's new 2012 Chevrolet Suburban that was bearing FL tag

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L17RD parked in the driveway. I conducted surveillance on the residence again on August 15, 2013 and once again observed the vehicle parked in the driveway.

The BestBuy Fraud Analyst, Paula, monitored the gift cards that still had a remaining balance. On August 18, 2013 at 18:43 and 18:45 hours, there were 2 additional transactions; transferring the balance of card ending in [REDACTED] to card ending in [REDACTED] and then a second transaction utilizing card ending in [REDACTED] to make a purchase. I was able to obtain the video of these transactions and I was able to identify Alberto Delgado and Karen Cypress together at the register. They then left the store and got into a Chevrolet Suburban that appeared to be Alberto's.

On September 3, 2013 I received the results from a subpoena to Finish Line. These results showed that Alberto Delgado placed an order on June 19, 2013 utilizing a \$25 gift card as part of the payment. Additionally, this order was placed from the same IP address, 174.48.28.55, and was shipped to 5648 Arthur Street in Hollywood, FL. That IP address is the same IP address that made the initial eBay purchases.

On September 4, 2013 I received the results of a subpoena that I had issued to Southwest Airlines as one of the things purchased by Alberto on eBay was a \$500 gift card for Southwest Airlines. I had requested any flight information for Alberto Delgado and they were able to provide me with a booking for Alberto Delgado and Desiree Rescigno. This flight was booked on June 13, 2013 from Fort Lauderdale International Airport to LaGuardia Airport via a connection through Atlanta, GA. The departure date was on June 14, 2013 and return flight was on June 17, 2013. As noted previously, the USPS signature had the last name of Rescigno as well. Additionally, the combined price for both of these tickets was \$707.20 of which \$500 was paid with a gift card and the remaining balance was paid utilizing a Wells Fargo card number that appeared to be in the name of Desiree Rescigno.

On September 12, 2013 I received the results of a search warrant for Alberto and Karen's Facebook pages. I was able to verify the identities of both owner's as Alberto Delgado and Karen Cypress. Additionally, I was able to verify the email addresses that were listed on eBay and PayPal. I was also able to verify the phone numbers of (954) 534-6277 for Alberto and (954) 248-7759 for Karen. Karen also had a message that she sent to someone shortly after the eBay purchases that she has a new phone number of (954) 699-6920 which was the other phone number listed on her account and the phone number that she had utilized to contact eBay and PayPal. My examination of their Facebook accounts also revealed activity that was conducted from the IP address of 174.48.28.55, which was the IP address that was used to make the purchases. Alberto had a conversation with someone who lived in New York and he told him that he was getting ready to travel to New York. The date of that conversation was June 14, 2013. I also observed that there was activity from the Facebook logs that showed that the accounts were accessed from an iPhone. Alberto's phone was through AT&T and Karen's was through Sprint. There were two iPhones that were purchased through Alberto's eBay account during the transactions; one was for AT&T and the other was for Sprint. Both of these phone accounts had two separate phone numbers attached to them.

Based on the fact that Alberto had purchased a 2012 Chevrolet Suburban on June 18, 2013 I requested certified records on the vehicle from Tallahassee. Upon doing so, I found out that the vehicle was purchased from Florida Fine Cars Inc. in Hollywood, FL. I issued a subpoena to Florida Fine Cars Inc. for the account information regarding this vehicle. Those records indicate that Alberto paid approximately \$32,088.00 for that vehicle and made a down payment in cash for \$21,000 leaving a balance of \$13,263.28 that he financed over the course of 90 days.

On September 19, 2013 a search warrant was issued by Judge Singhal for the iCloud backup information from Apple for Alberto and Karen's Apple accounts. I received the results from that search warrant on January 21, 2014. Upon reviewing those records I found that Alberto had not utilized his iCloud account to backup the majority of his cell phone and I did not observe any information that I felt was of value to my investigation. When I looked through the

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records of Karen's iCloud account I learned that she used it to backup a large amount of information. In those records I found a large amount of photographs and videos that had been present on Karen's phone and then backed up to her iCloud account. When I reviewed those photographs I learned that numerous items that had been purchased with Alberto's eBay account were being utilized for personal use by both Alberto and Karen, these items include a 10k yellow gold and diamond Jesus pendant, a 14k yellow gold bead ball chain necklace, a Louis Vuitton purse, a 14k yellow gold 3 carat diamond ladies bracelet, a round cut engagement ring, a Pamp Suisse 1oz gold bar that Alberto turned into a pendant, a 10k white gold 1.96 diamond cross pendant, and a Rolex 18k yellow gold bracelet type replacement band. Both suspects are observed in multiple photographs wearing the jewelry over the course of multiple months.

As many phones in this day and age contain the ability to use GPS locations, these coordinates are also embedded inside of the photographs that people take on these devices. The embedding of this GPS information is referred to as geo-tagging and this information can be obtained from within the meta-data/EXIF data of the images. I checked numerous images where Karen and Alberto were captured wearing the above mentioned items and I discovered that there were a number of photographs that were taken at their residence of 5648 Arthur Street in Hollywood. As mentioned previously, this was the same residence where the IP address that conducted the eBay transactions was registered.

On September 19, 2013 when I requested the search warrant for their iCloud accounts, I also requested incoming and outgoing email records from their Gmail accounts that were connected to their eBay accounts. I received those records on January 23, 2014 and began sorting through them. There were approximately 55 emails that I found to be of value to this case, most of which were between eBay sellers and Alberto. There were a couple of occasions where the seller advised him that they lived in the South Florida area and could meet up to save on the shipping costs, but Alberto always wanted them to ship the items. In one email he said that he had the items being shipped to his mother's address, which the posting showed that the item was shipped to 2415 Lincoln Street # 106, Hollywood, FL. On June 6, 2013 Alberto began getting a large amount of emails from PayPal saying that his primary method of payment was declined by his bank. Between June 6, 2013 and June 7, 2013 he received approximately 39 emails from PayPal notifying him of these declines. Even though these decline emails came through, Alberto continued to make purchases until his eBay and PayPal accounts were frozen on June 9, 2013. Furthermore, he sent messages to sellers wanting to know when his items were going to ship. In some emails, sellers informed him that they would ship within a few days, but Alberto said he needed the items shipped sooner, as if he believed that his accounts would be shut down soon and he wanted the items shipped before eBay blocked the account and requested the items be held by the seller. As mentioned previously, Alberto took it another step further and confirmed this bank account and his identity with PayPal and eBay on June 8, 2013 in an attempt to keep his accounts open further.

I also subpoenaed the Bank of America bank records for Alberto's account that was connected to his PayPal account. I received those records in September of 2013 as well. Those records indicated that at no time did Alberto ever have close to \$50,000 in his account. Furthermore, his account was used for deposits and withdrawals from the time it was opened on January 11, 2010 until May of 2013. The balance in the account fluctuated between its low point of \$3.27 and its high point of \$7,357.81 until May of 2013. In May the money was drained from the account leaving \$2.60 as of May 24, 2013; a few days later all of the eBay purchases began. Between May 24, 2013 and June 25, 2013 Bank of America showed that approximately \$52,445.33 of withdrawals were conducted against Alberto's account.

Additionally, I subpoenaed Chase for any accounts for Karen and Alberto as the account attached to Karen's PayPal account was a Chase account. Those records were sent to me by Chase on September 16, 2013 and they revealed that Karen and Alberto had opened an account together on April 11, 2013, which was not attached to either of their PayPal accounts. At the time the purchases started, their joint account had approximately \$6000 in it, which would not have covered the purchases that were made. In looking at the account that was connected with Karen's account I learned that it was a secondary account for the main account of [REDACTED]. There was also 1 additional account connected to that

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primary account. As of May 15, 2013 all of these accounts had a cumulative balance of \$1,383.39. By June 17, 2013 the ending balance of these accounts was -\$219.86.

Sometime in the beginning of 2014 Alberto and Karen moved out of their residence on Arthur Street. Karen is currently in a substance abuse facility while Alberto is living at 2840 Fillmore Street Apartment 6 in Hollywood. Surveillance on Saturday, March 15, 2014 confirmed this information.

As can be seen by the evidence mentioned in this affidavit, Alberto and Karen did not have the money to make these purchases, but they made them anyways. They then furthered their activity by requesting that the items be shipped as soon as possible knowing that there was no money to pay for the items. When their accounts were frozen, they went over and above to get them re-activated so that they could continue to make large purchases, even after being notified by PayPal that there were insufficient funds in their accounts. Knowing that these items were not paid for, they did not make attempts to return these items; instead they have acquired a large portion of the items for personal use. They have both benefited from this scheme and they have both attempted to make purchases utilizing this scheme.

Defendant- Karen Cypress, W/F, 07/26/1988

LKA: 2840 Fillmore Street Apartment 6, Hollywood, FL

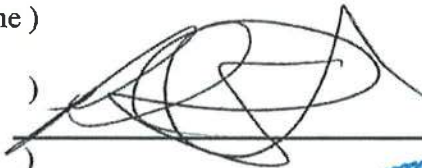
██████████ FLDL # C162-516-88-766-0

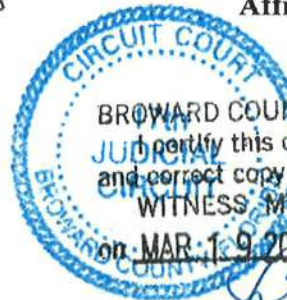
CASE # BS13-07-03241

The offense(s) set forth in the foregoing Affidavit is/are contrary to the statute(s) in such case made and provided, and against the peace and dignity of the State of Florida.

Sworn to and subscribed before me)
this 19 day of March, A.D. 2014.)


(Seal)
JUDGE, CIRCUIT COURT


)
Affiant



BROWARD COUNTY, FLORIDA
I certify this document to be a true
and correct copy of the original.
WITNESS MY HAND AND SEAL
on MAR 19 2014

Clerk of the Court
BY  D.C.

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IN THE COUNTY/CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA:

STATE OF FLORIDA, :
Plaintiff, :
Vs. : WARRANT To Arrest
Karen Cypress, W/F, 07/26/1988 Defendant, :
.....:

COUNTS 1 - 2

One (1) count of Organized Scheme to Defraud and One (1) count of Conspiracy

IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR THE SHERIFFS AND
CONSTABLES OF THE STATE OF FLORIDA:

WHEREAS, Detective Ronald Faircloth of the Broward County Sheriff's Office has this day made oath before
me that on the 3rd day of June 2013 through the 9th day of June 2013, in the County aforesaid, one Karen Cypress, W/F
07/26/1988 did then and there unlawfully:

COUNT ONE:

ORGANIZED SCHEME TO DEFRAUD

did engage in a scheme constituting a systematic, ongoing course of conduct with intent to defraud one or more retail
establishments, or to obtain property from one or more retail establishments by false or fraudulent, representations, or
promises, and did obtain property from one or more of such retail establishments, contrary to Florida Statute 817.034-4a1.

COUNT TWO:

CRIMINAL CONSPIRACY

did then and there unlawfully agree, conspire, combine, or confederate with each other to commit a criminal offense, to-
wit: Organized Scheme to Defraud, in that the said persons did unlawfully agree, conspire, combine, or confederate with
each other to commit organized scheme to defraud, contrary to F.S. 777.04 and F.S. 817.034-4a1,

The offense(s) set forth in the foregoing Warrant is/are contrary to the statute(s) in such case made and provided,
and against the peace and dignity of the State of Florida. Attached hereto and made a part hereof by incorporation is the
affidavit executed by Detective Ronald Faircloth Affiant herein.

*The offense(s) set forth in the foregoing Warrant is/are contrary to the Florida Statute(s) in such case made and
provided, and against the peace and dignity of the State of Florida. Attached hereto and made a part hereof by
incorporation is the Affidavit to Arrest executed by Detective Ronald Faircloth herein.*

1 Count Organized Scheme to Defraud
• FSS: 817.034(4)

Bond Amount: \$ 50,000.

BS13-07-03241

4 Counts Criminal Conspiracy

- FSS: 777.04

Bond Amount: \$ 50,000.-**SPECIAL BOND CONDITIONS**

1. The Defendant shall secure his/her release pursuant to a surety bond that is fully collateralized. The net asset value of the collateral must be in an amount equal to or greater than the bond amount.
2. **Prior to the Defendant's release**, the Defendant must fulfill a "Nebbia" requirement, as provided for under Florida Statute 903.046(2) and Florida Rule of Criminal Procedure 3.131.(b), wherein there will be an inquiry into the source of funds used to post bail. The Defendant will submit for the State's review documentation showing proof that the bond is fully collateralized and the legality of the funds used for both the bond premium and bond collateral. The State or the Defendant has the right to object and request a further hearing as to the sufficiency of the collateral and legality of the funds.
3. Only **after** the Court's subsequent review and issuance of an Order approving the Nebbia requirement of the legality of the funds and sufficiency of the collateral, will the Defendant then be eligible for release upon the posting of the said bond.
4. Any property used to collateralize the bond shall not be further encumbered or liquidated during the pendency of the bond.
5. The Surety shall provide to the State an updated title search with ten (10) days of the Defendant's release reflecting recorded mortgages of the properties utilized for bond collateral.
6. The Defendant will be monitored by Pretrial Services.
7. The Defendant will not possess any firearms.
8. The Defendant's shall surrender his/her passport and the surrendered passport shall remain in the custody of the Broward County Clerk. The defendant shall not reapply for any passport.

THESE ARE, THEREFORE, to command you forthwith to arrest the said Karen Cypress, and bring him/her before me to be dealt with according to law.

Given under my hand and seal the 19 day of March A.D. 2014.

BROWARD COUNTY, FLORIDA
 I certify this document to be a true
 and correct copy of the original.
 WITNESS MY HAND AND SEAL
 on MAR 19 2014
 BY [Signature] Clerk of the Court
 D.C.

[Signature]
 HONORABLE
 Judge of the Circuit/County Court