

~~SEALED~~

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

UNITED STATES OF AMERICA

v.

ABDUL RAHEEM ABDUL JABBAR,  
DBA FREEDOM AZ, LLC and  
DESERT MOBILE TRANSPORT, LLC;  
and  
NOHAD LOABNEH and  
ABEDELHALIM LAWABNI,  
DBA A & N SERVICES, LLC.

CRIMINAL COMPLAINT

CASE NUMBER: 20-3133MJ

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

Since at least April 1, 2020, during the COVID-19 public emergency, within the District of Arizona and elsewhere, defendants ABDUL RAHEEM ABDUL JABBAR, doing business as FREEDOM AZ, LLC, and DESERT MOBILE TRANSPORT, LLC, and NOHAD LOABNEH and ABEDELHALIM LAWABNI, doing business as A & N SERVICES, LLC, knowingly and willfully conspired to commit health care fraud (18 U.S.C. § 1347) by submitting false and fraudulent claims for non-emergency medical transportation services to the Arizona Health Care Cost Containment System (AHCCCS) in violation of Title 18, United States Code, Section 371.

I further state that I am a Special Agent with the FBI and this complaint is based on the following facts:

**See Attached Statement of Probable Cause Incorporated By Reference Herein.**

Continued on the attached sheet and made a part hereof:  Yes  No

AUTHORIZED BY: M. Bridget Minder and Peter Sexton, AUSAs

SA Jennifer M. Schlinz, FBI – Phoenix Division  
Name of Complainant

  
Signature of Complainant

Sworn telephonically

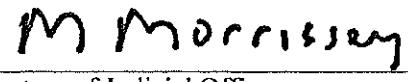
Date

5-21-20

at

Phoenix, Arizona  
City and State

HONORABLE MICHAEL T. MORRISSEY  
United States Magistrate  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

**STATEMENT OF PROBABLE CAUSE**

I, Jennifer M. Schlinz, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been employed with the FBI since December 2010. I am authorized to investigate violations of laws of the United States. I am a law enforcement officer with authority to execute arrest, search, and seizure warrants under the authority of 18 U.S.C. § 3052. I have a Master's degree in Accounting and Information Systems, and I am a Certified Public Accountant and a Certified Fraud Examiner. I am currently assigned to the Phoenix Division's Complex Financial Crimes Squad, specializing in a variety of financial investigations, including health care fraud.

2. This Statement of Probable Cause is intended to show only that there is sufficient probable cause for the requested summonses and does not set forth all of my knowledge about this matter. The facts in this Statement of Probable Cause come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

3. In April 2020, the Phoenix Division of the FBI received information regarding FREEDOM AZ, LLC (FREEDOM), DESERT MOBILE TRANSPORT, LLC (DESERT MOBILE), and A & N SERVICES, LLC (A&N) from the Arizona Health Care Cost Containment System (AHCCCS), Office of the Inspector General (OIG). AHCCCS-OIG ran an analysis for the year 2019 and reported to FBI that in 2019 more than 85% of the claims submitted for medical transportation by these three companies were unmatched to a corresponding medical or behavioral health claim covered by AHCCCS, which is a common indicator of fraud. FREEDOM is 95% owned and operated by ABDUL RAHEEM ABDUL JABBAR (ABDUL JABBAR), who resides in Phoenix, Arizona. DESERT MOBILE is owned and operated in part by Person 1; ABDUL JABBAR also operates DESERT MOBILE. A&N is 50% owned and operated by NOHAD LOABNEH, who resides in Fountain Hills, Arizona. LOABNEH's brother, ABEDELHALIM LAWABNI, is also 50% owner of A&N and resides in Fountain Hills, Arizona.

The COVID-19 Outbreak

4. In late 2019, a novel coronavirus, SARS-CoV-2 (the “coronavirus” or “COVID-19”), was first detected in Wuhan, Hubei Province of the People’s Republic of China (“PRC”). Since that time, COVID-19 has spread rapidly across the globe. On January 31, 2020, the United States Secretary of Health and Human Services (“HHS”) declared a national public health emergency under 42 U.S.C. § 247d as a result of the spread of COVID-19 to and within the United States. On March 11, 2020, the Director-General of the World Health Organization (“WHO”) characterized COVID-19 as a pandemic. On March 13, 2020, the President of the United States issued Proclamation 9994 declaring a national emergency beginning on March 1, 2020, as a result of the rapid spread of COVID-19 within the United States.

5. Starting around March 2020, COVID-19 has been spreading rapidly in Arizona. The Governor of the State of Arizona issued a declaration of Public Health Emergency to mitigate the spread of COVID-19, Executive Order 2020-07, “Protective Measures to Protect Against COVID-19,” which was signed on March 11, 2020. Also on March 11, 2020, the Navajo Nation tribal President declared that the Navajo Nation, a sprawling reservation that includes parts of Arizona, New Mexico and Utah, was under a public health state of emergency due to the spread of the coronavirus.

6. In an attempt to prevent the spread of COVID-19, Arizona and the Navajo Nation have instituted social distancing requirements, curfews, and other proactive measures. For example, on March 25, 2020, Governor Ducey signed Executive Order 2020-15, “Expansion of Telemedicine,” to promote the use of telemedicine in Arizona thereby reducing the number of in-person medical appointments. This order specifically directed AHCCCS to make telemedicine accessible to its members. On March 30, 2020, Governor Ducey signed Executive Order 2020-18,

"Stay Home, Stay Healthy, Stay Connected: Physical Distancing to Mitigate COVID-19 Transmission." This order directed Arizonans to stay at home with certain exceptions (primarily related to essential functions and businesses). In addition, the Navajo Nation later instituted 57-hour weekend curfews beginning Friday, April 10, 2020, to combat the spread of the coronavirus.

7. As a result of these orders and other measures to promote social distancing, the number of in-person medical appointments and gatherings, such as Alcoholics Anonymous (AA) meetings, has dramatically decreased since mid- to late-March of this year.

8. In April 2020, I contacted a church in Chinle, Arizona that was a frequent location for non-emergency medical transportation (NEMT) companies to transport patients to AA meetings. The pastor advised that as of March 25, 2020, the church was no longer holding AA meetings, except for once a day over the phone. Additionally, I spoke to an employee of the Alano Club in Flagstaff, Arizona who confirmed that his facility had cut meetings down to only two per day, at 12:00 p.m. and 6:00 p.m. The meetings typically had around 20 attendees, although the number varied; the 6:00 p.m. meeting generally had more attendees than the noon meeting. He also stated that Winslow, Arizona was not holding AA meetings during this time. According to websites, information provided by an AHCCCS investigator, and phone interviews, there were various options for virtually attending AA meetings through conference phone calls or Zoom meetings online.

The Arizona Health Care Cost Containment System

9. AHCCCS administers Medicaid health care programs to Arizona residents and is a health care benefit program as defined by 18 U.S.C. § 24(b). To obtain AHCCCS services, individuals must meet certain income and other requirements. The federal government pays states for a specified percentage of program expenditures, called the Federal Medical Assistance

Percentage (FMAP). AHCCCS is partially funded by the federal government through the FMAP. Since 2016, the FMAP for Arizona/AHCCCS has been between 68 and 70%. On March 18, 2020, the President of the United States signed into law H.R. 6021, *the Families First Coronavirus Response Act* (FFCRA) (Pub. L. 116-127). Section 6008 of the FFCRA provides a temporary 6.2% increase to each qualifying state's FMAP during the public health emergency. Depending on the length of the public health emergency, it is estimated that Arizona may receive additional federal funding of approximately \$700 million due to the temporary FMAP increase.

10. AHCCCS pays for covered medical appointments and other services for its members, including non-emergency transportation services for members who do not have transportation to covered medical appointments. Chapter 14 of the AHCCCS Fee-For-Service (FFS) Provider Manual, in effect during all relevant times, addresses non-emergency medical transportation services and sets forth the following:

a. "When free transportation services are unavailable and an eligible person is unable to arrange or pay for transportation, AHCCCS covers medically necessary non-emergency medical transportation to and from an AHCCCS covered medical or behavioral health service for most recipients. Non-emergency medical transportation (NEMT) is not covered for Emergency Services Program members."

b. "Transportation is limited to the cost of transporting the recipient to and from either of the following active AHCCCS registered provider locations capable of meeting the member's needs: 1) The nearest appropriate IHS/Tribal 638 medical or behavioral health facility; or 2) The nearest appropriate medical or behavioral health provider."

11. Charges for non-emergency medical ground transportation are based on a small fixed-base fee per recipient plus an amount computed for round-trip miles driven per recipient. AHCCCS will pay separately for each passenger that is being transported on a given trip. Conceptually, it is akin to the flag drop charge for a taxi, plus an additional charge per mile for the mileage driven.

12. Prior authorization from AHCCCS is normally required for NEMT trips over 100 miles (one-way, round-trip, or multiple trips in the same day) for both medical and behavioral health services for FFS members. During the COVID-19 public emergency, however, AHCCCS waived this requirement, allowing providers to submit claims for any number of miles without prior authorization, effective April 1, 2020.

13. To participate in the fee-for-service transportation of AHCCCS beneficiaries, a Provider must register with AHCCCS and review, complete and sign a number of documents (including a “Provider Participation Agreement,” a “Disclosure of Ownership/Control and Criminal Offenses Statement,” a W-9 “Request for Taxpayer Identification Number and Certification,” and a “Provider Type Profile”), as well as provide proof of insurance for the vehicles to be used for NEMT.

14. AHCCCS information and guidance can be reviewed at any time through the State Medicaid website (<https://www.azahcccs.gov/PlansProviders/GuidesManualsPolicies/index.html>). At all relevant times, this website could be used to submit claims, check claim status, review AHCCCS guides/manuals, check prior authorization requests, and check recipient eligibility and enrollment status.

The Conspiracy to Commit Health Care Fraud

15. As discussed more below, defendants conspired to submit false and fraudulent

claims to AHCCCS for non-emergency transports. Defendants' false and fraudulent claims continued during the COVID-19 emergency.

16. Business records, bank records, and interviews show defendants are working together to commit health care fraud:

a. I interviewed Person 1 by phone on May 14, 2020. Person 1 is the registered owner of DESERT MOBILE. Person 1 told me that he allows ABDUL JABBAR to use DESERT MOBILE's provider ID number to bill AHCCCS for NEMTs, starting around 2018. Person 1 and ABDUL JABBAR made an agreement that Person 1 would receive 5% of ABDUL JABBAR's reimbursements from AHCCCS in exchange for Person 1 letting ABDUL JABBAR use DESERT MOBILE's provider ID number.

b. According to AHCCCS records, AHCCCS makes payments to DESERT MOBILE by wiring claim reimbursement amounts to a bank account in the name of "The Life Transport, LLC." According to bank records, the authorized signers on The Life Transport, LLC's bank account are ABDUL JABBAR and LOABNEH, owner of A&N.

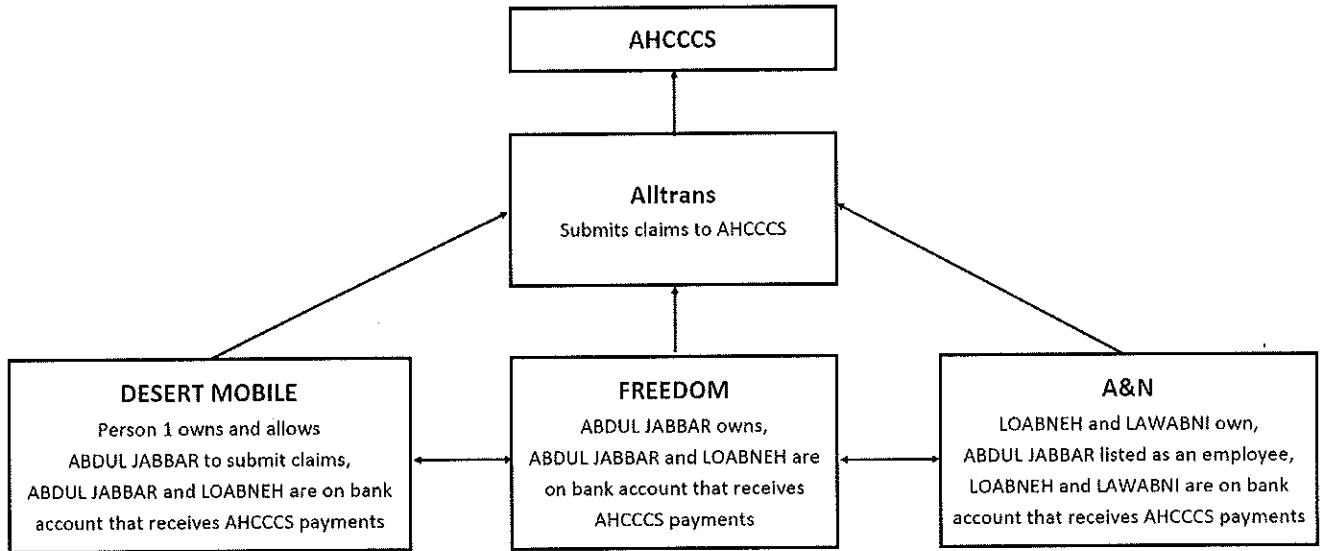
c. Also according to AHCCCS and bank records, both ABDUL JABBAR and LOABNEH are authorized signers on the bank account to which AHCCCS makes payments for FREEDOM's NEMT claims.

d. According to AHCCCS records, ABDUL JABBAR is registered with AHCCCS as an employee of A&N.

e. According to records of the Arizona Corporation Commission (ACC), in February 2020, LOABNEH (using Nohad and Suzan Loabneh Trust, dated February 7, 2019) formed Valley Investment Group, LLC, with ABDUL JABBAR, with a business address that is ABDUL JABBAR's current residence.

f. FREEDOM, DESERT MOBILE, and A&N all currently use Alltrans Software, a Minnesota-based software company, to submit claims to AHCCCS.

17. A chart summarizing the relationship among the defendants is as follows:



#### Freedom AZ, LLC

18. According to ACC records, FREEDOM was incorporated in Arizona on or about November 28, 2012, by J.M. and C.M. According to ACC records, defendant ABDUL JABBAR was added as a member/manager and 95% owner of Freedom as of July 23, 2018, with a business address that is similar to ABDUL JABBAR's current residence.

19. Effective May 8, 2013, FREEDOM became registered with AHCCCS as a NEMT provider and was assigned provider number 814388. On June 26, 2018, a "Change in Ownership" document was submitted to AHCCCS, signed by C.M., which listed ABDUL JABBAR as the 95% owner of FREEDOM. On November 6, 2019, defendant signed a Provider Participation Agreement in which he agreed to comply with State and Federal laws, as well as all AHCCCS service and policy manuals.

20. In late 2019, when ABDUL JABBAR took over ownership and control of FREEDOM, FREEDOM began submitting significantly more claims for NEMT to AHCCCS, including an increasing number of claims that did not correspond to a medical or behavioral service covered by AHCCCS. According to claims data from AHCCCS, during the first three quarters of 2019, FREEDOM's monthly claims to AHCCCS for NEMT ranged from about \$225,000 to \$335,000 per month. In October and November 2019, FREEDOM's monthly claims for NEMT increased to about \$445,000 (October) and \$412,000 (November). Starting in December 2019, FREEDOM's monthly claims for NEMT more than doubled: more than \$968,000 in December 2019; more than \$1,000,000 each month in January and February 2020; and more than \$933,000 in March 2020.

Desert Mobile Transport, LLC

21. According to ACC records, DESERT MOBILE was incorporated in Arizona on or about September 17, 2010, by Person 1. According to ACC records, Person 1 is the only manager/member with a business address that appears to be Person 1's residence in Queen Creek, Arizona.

22. Effective January 1, 2011, DESERT MOBILE became registered with AHCCCS as a NEMT provider and was assigned provider number 586611. On January 14, 2011, Person 1 signed a Provider Participation Agreement in which he agreed to comply with State and Federal laws, as well as all AHCCCS service and policy manuals.

23. In the second half of 2019, after ABDUL JABBAR became more involved in the company, DESERT MOBILE began submitting significantly more claims for NEMT to AHCCCS, including an increasing number of claims that did not correspond to a medical or behavioral service covered by AHCCCS. According to claims data from AHCCCS, during the first quarter of 2019,

DESERT MOBILE's monthly claims to AHCCCS for NEMT ranged from about \$195,000 to \$300,000 per month. Starting in May 2019, DESERT MOBILE's claims for NEMT increased dramatically each month. From September 2019 through March 2020, DESERT MOBILE submitted claims for over \$1 million per month: with \$1 million in September 2019, \$1.2 million in October 2019, \$1.3 million in November 2019, \$1.5 million in December 2019, \$1.6 million in January 2020, \$1.7 million in February 2020, and \$1.3 million in March 2020.

A & N Services, LLC

24. According to ACC records, A&N was incorporated in Arizona on or about December 10, 2012, by LOABNEH and LAWABNI. According to ACC records, defendants are both listed as managers with a business address showing 8441 Wayzata Blvd, Suite 125, Golden Valley, Minnesota 55426.

25. Effective March 1, 2013, A&N became registered with AHCCCS as a NEMT provider and was assigned provider number 788265. On December 18, 2012, defendant LOABNEH signed a Provider Participation Agreement in which he agreed to comply with State and Federal laws, as well as all AHCCCS service and policy manuals. LAWABNI was identified on the AHCCCS registration paperwork as Vice President of A&N with 50% ownership.

26. A&N has consistently submitted a high number of claims over the past year with an average of 93% of claims being unmatched to a corresponding medical or behavioral health service covered by AHCCCS. According to claims data from AHCCCS, A&N submitted approximately \$1 million in claims for 10 out of 12 months in 2019. Also for the year 2019, 78% of all trips claimed were exactly 100 miles. In 2020, A&N billed over \$800,000 in January and February and over \$700,000 in March.

Health Care Fraud

27. In April 2020, during the COVID-19 emergency, FREEDOM, DESERT MOBILE, and A&N all continued submitting a significant number of claims for purported NEMT services, despite the significant decrease in in-person medical appointments and behavioral services that might be covered for certain AHCCCS members (such as AA meetings).

28. According to AHCCCS claims data, FREEDOM, DESERT MOBILE and A&N submitted claims to AHCCCS, seeking a total of more than \$2.75 million in reimbursement for non-emergency medical transports purportedly provided in April 2020:

a. FREEDOM submitted claims purporting to have provided approximately 3,728 transports in April 2020, during a time when there were very strict Stay-At-Home orders and Navajo Nation curfews in place. Of the 3,728 alleged transports, FREEDOM claimed 45% of the transports were either exactly 98 or exactly 100 miles and 45% were trips greater than 100 miles. In contrast, in 2019, only 4% of FREEDOM's transports were more than 100 miles. (As mentioned above, beginning April 1, 2020, prior authorization was no longer required for trips greater than 100 miles.) FREEDOM received a total of \$900,104 in payments from AHCCCS for transports purportedly provided in April 2020.

b. DESERT MOBILE submitted claims purporting to have provided approximately 3,598 transports in April 2020. Of the 3,598 alleged transports, DESERT MOBILE claimed 47% of the transports were either exactly 98 or exactly 100 miles and 47% were trips greater than 100 miles. In contrast, in 2019, only 2% of DESERT MOBILE's transports were more than 100 miles. DESERT MOBILE received a total of \$967,772 in payments from AHCCCS for transports purportedly provided in April 2020.

c. A&N submitted claims purporting to have provided approximately 2,552 transports in April 2020. Of the 2,552 alleged transports, A&N claimed 82% were trips greater than 100 miles. In contrast, in 2019, only 1% of A&N's transports were more than 100 miles. A&N received a total of \$888,094 in payments from AHCCCS for transports purportedly provided in April 2020.

29. I reviewed supporting documents (including selected "trip sheets") submitted to AHCCCS by FREEDOM, DESERT MOBILE, and A&N for transports purportedly provided in April 2020. My review showed that nearly all of the trip sheets submitted by FREEDOM, DESERT MOBILE, and A&N claimed the NEMT was for a ride to an AA meeting. As noted above, very few locations were open for in-person AA meetings during the COVID-19 public emergency. My review of the trip sheets showed other indicators of health care fraud, for example:

a. FREEDOM's trip sheets for April 8, 2020 purport to show that one driver, T.J., transported nine passengers at the same time (for a total of ten people in the car) to the Alano Club in Flagstaff, Arizona for an AA meeting that was supposedly at noon on April 8, 2020. According to the trip sheets, T.J. drove a Toyota Highlander, which typically holds (at most) seven people including the driver. Among the nine passengers supposedly in the Highlander for the AA meeting were a two-year-old and a 16-year-old, plus a parent as an escort. All of the trip sheets reported the same pickup and drop-off times and the same odometer readings, even though the trip sheets also show the passengers were picked up from two different towns. The number of miles submitted for each passenger was exactly 260 miles roundtrip. In short, the trip sheets claim that 10 people spent approximately four hours driving to and from Flagstaff for an AA meeting that lasted one hour, while virtual AA meetings were available. On April 13, 2020, FREEDOM submitted

claims to AHCCCS for transporting eight of the passengers (excluding the parental escort), each for 260 miles roundtrip.

b. The April 8, 2020 trip sheets for FREEDOM that I reviewed also showed that another FREEDOM driver, H.Y., purportedly transported six passengers in a 2006 Honda Pilot with all trip sheets containing the same drop-off odometer readings and similar times. Five of those passengers were supposedly dropped off at the Alano Club in Flagstaff, Arizona for the AA meeting at noon on April 8, 2020, while one passenger was supposedly dropped off at the Alano Club in Winslow, Arizona—in other words, FREEDOM’s trip sheets for driver H.Y. claim she was dropping off patients at two difference locations, more than an hour away, in the same car at the same time. Additionally, the Alano Club in Winslow, Arizona was closed on April 8, 2020 due to the COVID-19 public emergency. The number of miles submitted for each passenger was exactly 380 miles roundtrip with a total driving time of over five hours. On April 13, 2020, FREEDOM submitted claims to AHCCCS for transporting six of passengers, each for 380 miles roundtrip.

c. DESERT MOBILE’s trip sheets for April 9, 2020 purport to show that one driver, A.N., transported ten passengers at the same time (for a total of 11 people in the car, including A.N.) to the Alano Club in Winslow, Arizona for an AA meeting that was supposedly at 8:00 AM on April 9, 2020. According to the trip sheets, A.N. drove a Nissan Quest, which typically holds (at most) seven people including the driver. The odometer readings listed on the trip sheets had been crossed out and re-written, and the mileage numbers provided were inconsistent between the trip sheets even though the drop off and pick up locations were the same. The number of miles submitted for each passenger was 100 miles roundtrip. Additionally, the Alano Club in Winslow, Arizona was closed on

April 9, 2020 due to the COVID-19 public emergency. In short, the trip sheets claim that 11 people spent approximately two hours driving to and from Winslow, AZ to a facility that was closed. On April 13, 2020, DESERT MOBILE submitted claims to AHCCCS for transporting 10 passengers, each for 100 miles roundtrip.

d. The April 9, 2020 trip sheets I reviewed also showed that another DESERT MOBILE driver, R.T., purportedly transported 10 passengers to the same AA meeting in Winslow, AZ at 8:00 AM on April 9, 2020. According to the trip sheets, R.T. drove a Toyota Sienna, which typically holds (at most) seven people including the driver. In short, the trip sheets claim that 11 people spent approximately two hours driving to and from Winslow, AZ to a facility that was closed. On April 13, 2020, DESERT MOBILE submitted claims to AHCCCS for transporting 10 passengers, each for 100 miles roundtrip.

e. I also reviewed trip sheets for A&N for April 9, 2020. A&N submitted more than 60 claims to AHCCCS for transports that purportedly took place on April 9, 2020, all of which purported to transport an individual to the Alano Club in Flagstaff for an AA meeting at 12:00 PM. Per a phone discussion with a male who works at the Alano Club, this AA meeting place and time was still being held during the COVID-19 public emergency; however, only about 20 people attended the 12:00 p.m. meeting.

f. A&N's April 9, 2020 trips sheets also purport to show that one driver, N.Y., transported eight passengers at the same time (for a total of nine people in the car, including N.Y.) to the Alano Club in Winslow, Arizona for an AA meeting that was supposedly at 9:00 AM on April 9, 2020. According to the trip sheets, N.Y. drove a "Blue 2006 Toyota" and did not identify the model of the vehicle. The odometer readings provided were inconsistent between the trip sheets even though the drop off location was the same.

Additionally, the Alano Club in Winslow was closed on April 9, 2020, due to the COVID-19 public emergency. In short, the trip sheets claim that nine people spent approximately two hours driving in one car to and from Winslow, AZ to a facility that was closed. On April 14, 2020, A&N submitted claims to AHCCCS for transporting 8 passengers, each for exactly 100 miles roundtrip.

30. To further investigate the false and fraudulent claims submitted by FREEDOM, DESERT MOBILE, and A&N, on April 27, 2020, FBI agents and task force officers conducted surveillance at 2102 East 3rd Avenue, Flagstaff, Arizona from approximately 11:00 am to 1:22 p.m. This location is the Flagstaff Alano Club, which is frequently identified on trip sheets submitted by defendants as the place to which they're transporting AHCCCS members to and from. Although there was an AA meeting held at this location at 12:00 p.m. on April 27, 2020, FBI's surveillance revealed that less than 20 people were dropped off at the meeting, and there were no vehicles present from A&N, FREEDOM, or DESERT MOBILE.

31. I then reviewed trip sheets for claims submitted by A&N, FREEDOM, and DESERT MOBILE for transports they purportedly provided on April 27, 2020. Each company purported to have transported more than 20 passengers to the Flagstaff Alano Club (2102 East 3<sup>rd</sup> Avenue) on April 27, 2020 for the AA meeting at noon: FREEDOM claimed to have transported 57 people; DESERT MOBILE claimed to have transported 61 people (including a one-year old); and A&N claimed to have transported 64 people—a total of 182 people.

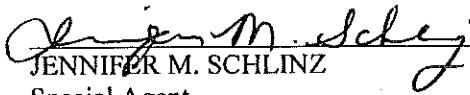
32. FREEDOM, DESERT MOBILE, and A&N submitted additional claims with similar indicators of fraud through the end of April 2020 and have continued to submit false and fraudulent claims for non-emergency transportation in May 2020.

33. Based upon the aforementioned facts, I believe that probable cause exists that, starting at least by April 1, 2020 and continuing through the present, ABDUL RAHEEM ABDUL JABBAR, doing business as FREEDOM AZ, LLC and DESERT MOBILE TRANSPORT, LLC, and NOHAD LOABNEH and ABEDELHALIM LAWABNI, doing business as A & N SERVICES, LLC, have conspired to commit Health Care Fraud (18 U.S.C. § 1347) by submitting false and fraudulent claims to AHCCCS during the COVID-19 public health emergency for NEMT services, in violation of 18 U.S.C. § 371.

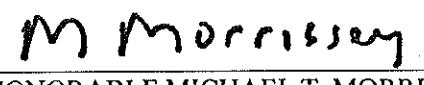
34. The FBI seeks a summons for ABDUL RAHEEM ABDUL JABBAR, NOHAD LOABNEH, and ABEDELHALIM LAWABNI. The FBI plans to promptly serve the summonses on these individuals once the complaint is signed.

Respectfully submitted,

Executed On (Date)

  
JENNIFER M. SCHLINZ  
Special Agent  
Federal Bureau of Investigation

X Sworn by Telephone  
5-21-20  
Date & Time

  
HONORABLE MICHAEL T. MORRISSEY  
United States Magistrate Judge