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13 **UNITED STATES DISTRICT COURT**

14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 JUAN TRANDAFIR,
19 aka “Juan Bobocel,”

20 Defendant.

Case No.: '24 MJ1736 SBC

COMPLAINT FOR VIOLATION OF:

Title 18, U.S.C., Sec. 1029(a)(2), (b)(1),
and (c)(1)(A)(i) - Use and Attempted Use
of Unauthorized Access Devices; Title 18,
United States Code, Sections 982(a)(2)(B)
and 1029(c)(1)(C) – Criminal Forfeiture

21
22 The undersigned Complainant, being duly sworn, states that, at all times material
23 to the Complaint:

24 **Introductory Allegations**

25 1. An “access device” was any card, plate, code, account number, electronic
26 serial number, personal identification number, or other means of account access that
27 could be used, alone or in conjunction with another access device, to obtain money,
28 goods, or services. Common forms of access devices were debit and credit cards, as

1 well as the account information typically encoded on the magnetic strips on the backs
2 of such cards.

3 2. An “unauthorized access device” was any access device that was lost,
4 stolen, or obtained with intent to defraud.

5 3. The U.S. Department of Health and Human Services, Administration for
6 Children and Families, administers the Temporary Assistance to Needy Families
7 (TANF) program. TANF is a federally funded assistance program that supports low-
8 income families with children. In California, TANF funds are used to operate
9 CalWORKS, a state public assistance program that provides cash aid to eligible families
10 with one or more children in the home. In California, CalWORKS public assistance
11 benefits are distributed by means of a card encoded with electronic account information,
12 similar to a debit or credit card, called the California Advantage Electronic Benefit
13 Transfer Card, which recipients use, along with a four-digit personal identification
14 number, to withdraw funds.

15 **Count 1**

16 **Use and Attempted Use of Unauthorized Access Devices**

17 **18 U.S.C. § 1029(a)(2) and (b)(1)**

18 4. Paragraphs 1 through 3 are hereby incorporated by reference as if fully
19 stated herein.

20 5. Between March 1, 2023 and January 2, 2024, in the Southern District of
21 California and elsewhere, defendant JUAN TRANDAFIR, aka “Juan Bobocel,” did
22 knowingly and with intent to defraud use one and more unauthorized access devices, to
23 wit, Electronic Benefit Transfer account information and personal identification
24 numbers issued to persons other than defendant, during a one-year period, and by such
25 conduct obtain cash and other things of value aggregating \$1,000 and more during such
26 one-year period, said use affecting interstate and foreign commerce;

1 All in violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and
2 1029(c)(1)(A)(i).

3 **Forfeiture Allegations**

4 6. The allegations above are incorporated herein for purposes of alleging
5 forfeiture to the United States pursuant to Title 18, United States Code, Section
6 982(a)(2)(B) and 1029(c)(1)(C).

7 7. Upon conviction of the offense set forth in the complaint, defendant JUAN
8 TRANDAFIR, aka “Juan Bobocel,” shall forfeit to the United States, pursuant to Title
9 18, United States Code, Section 982(a)(2)(B) and 1029(c)(1)(C), any property
10 constituting and derived from proceeds Defendants obtained directly and indirectly
11 from the offense, and any personal property used and intended to be used to commit the
12 offense.

13 This complaint is based on the attached Statement of Facts incorporated herein
14 by reference.



15 _____
16 Special Agent Eugene Scherba
17 U.S. Secret Service

18
19 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P.
20 4.1 by telephone on May 3, 2024.



21 _____
22 HON. STEVE B. CHU
23 U.S. Magistrate Judge

1 *Overview*

2 3. The United States Secret Service (USSS), along with Homeland Security
3 Investigations (HSI) and the Southern California Cyber Fraud Task Force (SoCal
4 CFTF), are working with state and federal agencies to investigate the theft and misuse
5 of funds electronically distributed to individuals receiving public assistance.

6 4. This Affidavit is submitted in support of an arrest warrant for JUAN
7 TRANDAFIR, aka “Juan Bobocel,” for violating 18 U.S.C. § 1029(a)(2) (access device
8 fraud) and (b)(1) (attempt). As outlined below, between March 1, 2023 and January 2,
9 2024, TRANDAFIR made a series of unauthorized withdrawals at San Diego County
10 ATMs in which he attempted to withdraw \$169,670.00 from the public assistance
11 benefit accounts of approximately 181 victims.

12 5. TRANDAFIR is a Romanian citizen and “TRANDAFIR” is the family
13 name this individual has registered with Romanian authorities. Records show that
14 TRANDAFIR flew from Los Angeles to Romania in 2017. No records available to the
15 USSS reflect TRANDAFIR thereafter entering the United States at a designated port of
16 entry.

17 *Background on Electronic Benefit Transfer Cards*

18 6. In 2022, California’s Department of Social Services (CalDSS) advised the
19 SoCal CFTF that it had detected a rise in fraud associated with the electronic debit cards
20 issued to individuals and families who qualify for California public benefits like
21 CalFresh and CalWORKS.

22 7. The U.S. Department of Agriculture also noticed a rise in fraud associated
23 with the Supplemental Nutrition Assistance Program (SNAP) that it administers
24 through its Food and Nutrition Service (FNS). SNAP is a federally funded assistance
25 program designed to help low-income individuals and families purchase food. In
26 California, SNAP public assistance benefits are distributed through CalFresh and
27 loaded to an account that a qualified recipient access by means of an access card, similar
28

1 to a debit or credit card, called the California Advantage Electronic Benefit Transfer
2 (EBT) Card. The EBT card system was developed to enable government agencies in
3 California and many other states to deliver public assistance benefits to recipients using
4 electronic transfers. The EBT system is a computer-based system through which
5 authorization for qualifying food purchases and cash withdrawals are received via either
6 a point-of-sale (POS) terminal or an ATM.

7 8. The U.S. Department of Health and Human Services, Administration for
8 Children and Families, administers the Temporary Assistance to Needy Families
9 (TANF) program. TANF is a federally funded assistance program that awards grants
10 to individual states to support low-income families with children. In California, TANF
11 grant funds are used to operate CalWORKS, a state public assistance program that
12 provides cash aid to eligible families with one or more children in the home. Families
13 that apply and qualify for ongoing CalWORKS assistance receive money each month
14 to help pay for housing, food, and other necessary expenses. Like CalFresh,
15 CalWORKS benefits are distributed by CalDSS through the California Advantage EBT
16 card.

17 9. After a recipient applies for, and is approved to receive, California public
18 assistance benefits like CalFresh and CalWORKS, the benefits are automatically
19 distributed to the recipient's EBT card on a designated day of the month (typically, in
20 California, the first five days of the month). To access their benefits to purchase eligible
21 food items, recipient swipe their card through a point-of-sale terminal, or insert it into
22 an ATM, that records the card number, date, time, and amount of the transaction. The
23 recipient then enters his/her unique Personal Identification Number (PIN) into a keypad
24 to complete the transaction.

25 10. The SoCal CFTF has gathered evidence indicating that members of what
26 appear to be one or more criminal enterprises are stealing California EBT account
27 information by installing skimmers on point-of-sale terminals, often by targeting point-
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1 of-sale terminals at large volume retailers, like Walmart, in communities with higher
2 concentrations of public benefit recipients. The skimmed data is then often re-encoded
3 onto the magnetic strips of cards that members of the conspiracy use to make
4 unauthorized withdrawals and purchases. These re-encoded cards are sometimes
5 referred to as “cloned” cards. Cloned cards can be a blank white plastic card, or another
6 debit, credit, or gift card. Cloned cards may have names or numbers embossed on the
7 physical face of the card. A common feature of cloned cards is that the account number
8 encoded on the card’s magnetic strip will not match the number embossed on the card’s
9 face. To facilitate the use of the stolen EBT benefits, members of the scheme will
10 commonly put stickers bearing the account’s PIN on the physical cards, or access
11 devices, that are swiped at a point-of-sale terminal along with the account balance.

12 11. Data provided by CalDSS indicates that, between approximately June
13 2022 and February 2024, in the Southern District of California and elsewhere,
14 unauthorized account users have stolen approximately \$181,208,693.00 from
15 CalWORKS recipients. These unauthorized withdrawals commonly occur at the start
16 of each month, when monthly CalWORKS benefits are distributed. Most of the stolen
17 funds were obtained through unauthorized ATM withdrawals.

18 12. In July and August 2022, the SoCal CFTF learned of connected incidents
19 at Walmart stores in Chula Vista, National City, and Sherman Heights involving overlay
20 skimmers that appeared to be part of an EBT fraud scheme.¹ According to police reports
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22 ¹ An overlay skimmer is a skimmer that is part of a counterfeit faceplate designed to
23 resemble the legitimate point-of-sale terminal. Overlay skimmers are mounted to the
24 legitimate point-of-sale terminal and allow a victim’s credit or debit card to be read by
25 the legitimate terminal. In the process of inserting the victim’s credit or debit card into
26 the legitimate terminal, the card is also read by the overlay skimmer, which stores the
27 card’s stolen electronic information for later unauthorized use. The overlay skimmers
28 that target EBT cards are not designed to read credit or debit cards embedded with a
chip (i.e., most credit and debit cards). Unlike most bank-issued credit and debit cards,

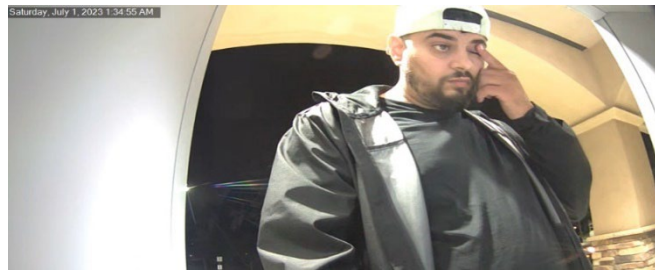
1 and records obtained by the task force, in June 2022, National City Police arrested a
2 Romanian national who was caught installing an overlay skimmer without authorization
3 at a National City Walmart. The suspect had at least one coconspirator assist him with
4 the installation. In July 2022, employees at a Chula Vista Walmart discovered an
5 unauthorized overlay skimmer installed on a point-of-sale terminal. Store surveillance
6 footage showed that the individual arrested by National City Police had, along with his
7 unidentified coconspirator, installed the overlay skimmer at the Chula Vista Walmart
8 two days before his arrest in National City. When arrested by National City Police, the
9 suspect presented a fake European ID that misrepresented his name and nationality
10 Record checks revealed his true name, Romanian nationality, and indicated that he had
11 entered the U.S. without inspection. Additional investigation revealed that this
12 individual, or someone closely matching his appearance, had installed an overlay
13 skimmer at a Sherman Heights Walmart in March 2022 with the assistance of two
14 additional coconspirators.

15 13. In spring 2023, the USSS conducted operations in the Southern and Central
16 Districts of California during which it surveilled ATMs that had historically been used
17 to make unauthorized EBT account withdrawals. During the March operation in Los
18 Angeles, the USSS arrested 14 individuals. During its June 2023 operation, the USSS-
19 San Diego and SoCal CFTF arrested five individuals, along with a sixth individual in
20 July 2023. Five of the six individuals arrested in San Diego County had a history of
21 making of unauthorized EBT account withdrawals in San Diego prior to the night of
22 their arrest. Several of these individuals had also previously installed skimming devices
23 on point-of-sale terminals or inside ATMs, and/or were found in possession of access-
24 device making equipment at the time of their arrest. Of the 20 people arrested in
25 Southern California between March and July 2023, all but one were Romanian.

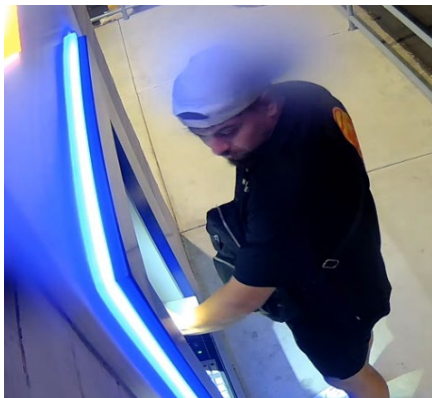
26 _____
27 EBT cards do not have chips (which makes the cards less expensive). The overlay
28 skimmers that cannot read cards with chips therefore typically target EBT cards.



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7 d. Continuing on July 1, 2023, at or about approximately 1:35 a.m.,
8 TRANDAFIR went to a different bank's ATMs located near the Lemon Grove ATM
9 he had accessed five minutes earlier and successfully withdrew \$2,900.00 from the EBT
10 accounts of four victims. The victims reside in Los Angeles and San Bernardino
11 Counties. Here is an ATM surveillance image of him at that ATM:



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17 e. On July 3, 2023, at or about approximately 1:32 a.m., TRANDAFIR
18 went to a bank ATM located in Fallbrook in San Diego County and successfully
19 withdrew \$6,580.00 from the EBT accounts of five victims. The victims reside in Los
20 Angeles County. Here are bank surveillance images of him at the ATM:



1 f. On August 1, 2023, at or about approximately 12:01 a.m.,
2 TRANDAFIR went to a bank ATM located in Oceanside in San Diego County and
3 attempted to withdraw \$9,900.00 from the EBT accounts of 11 victims. The victims
4 reside in Los Angeles and San Bernardino. Of the attempted withdrawals,
5 TRANDAFIR successfully withdrew \$9,100.00.

6 g. On August 2, 2023, at or about approximately 12:03 a.m.,
7 TRANDAFIR went to a bank ATM located in Oceanside and successfully withdrew
8 \$680.00 from the EBT accounts of 1 victim. The victim resides in San Bernardino
9 County.

10 h. Continuing on August 2, 2023, at or about approximately 12:09
11 a.m., TRANDAFIR went to different Oceanside ATM and successfully withdrew
12 \$21,460.00 from the EBT accounts of 24 victims. The victims reside in San Bernardino,
13 Los Angeles, and Orange Counties.

14 i. On August 3, 2023, at or about approximately 12:14 a.m.,
15 TRANDAFIR went to a bank ATM located in Oceanside and successfully withdrew
16 \$15,380.00 from the EBT accounts of 18 victims. The victims reside in San Bernardino,
17 Riverside, and Los Angeles Counties.

18 j. On September 2, 2023, at or about approximately 12:01 a.m.,
19 TRANDAFIR went to a bank ATM located in Oceanside and successfully withdrew
20 \$4,700.00 from the EBT accounts of 5 victims. The victims reside in Los Angeles and
21 San Bernardino Counties.

22 k. On September 3, 2023, at or about approximately 12:08 a.m.,
23 TRANDAFIR went to a bank ATM located in Oceanside and attempted to withdraw
24 \$13,220.00 from the EBT accounts of 14 victims. The victims reside in Los Angeles,
25 Ventura, and San Bernardino Counties. Of the attempted withdrawals, TRANDAFIR
26 successfully withdrew \$11,420.00.

1 1. On October 1, 2023, at or about approximately 12:00 a.m.,
2 TRANDAFIR went to a bank ATM located in San Marcos in San Diego County and
3 attempted to withdraw \$3,300.00 from the EBT accounts of four victims. The victims
4 reside in Los Angeles and Ventura Counties. Of the attempted withdrawals,
5 TRANDAFIR successfully withdrew \$2,380.00.

6 m. Continuing on October 1, 2023, at or about approximately 12:38
7 a.m., TRANDAFIR went to a bank ATM located in Escondido in San Diego County
8 and attempted to withdraw \$10,020.00 from the EBT accounts of 12 victims. The
9 victims reside in Los Angeles, San Bernardino, Ventura, and San Diego Counties. Of
10 the attempted withdrawals, TRANDAFIR successfully withdrew \$8,400.00.

11 n. On December 2, 2023, at or about approximately 12:14 a.m.,
12 TRANDAFIR went to a bank ATM located in San Diego and attempted to withdraw
13 \$9,580.00 from the EBT accounts of 11 victims. The victims reside in Orange, Los
14 Angeles, and Ventura Counties. Of the attempted withdrawals, TRANDAFIR
15 successfully withdrew \$7,900.00.

16 o. On January 1, 2024, at or about approximately 1:38 a.m.,
17 TRANDAFIR went to a bank ATM located in Carlsbad and attempted to withdraw
18 \$14,380.00 from the EBT accounts of 15 victims. The victims reside in Los Angeles,
19 San Bernardino, and Riverside Counties. Of the attempted withdrawals, TRANDAFIR
20 successfully withdrew \$9,500.00.

21 p. On January 2, 2024, at or about approximately 12:01 a.m.,
22 TRANDAFIR went to a bank ATM located in Escondido and successfully withdrew
23 \$3,360.00 from the EBT accounts of 4 victims. The victims reside in Los Angeles and
24 San Bernardino Counties.

25 q. Continuing on January 2, 2024, at or about approximately 12:09
26 a.m., TRANDAFIR went to a different Escondido ATM and attempted to withdraw
27 \$34,240.00 from the EBT accounts of 30 victims. The victims reside in San Bernardino,
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1 Riverside, Los Angeles, and Orange Counties. Of the attempted withdrawals,
2 TRANDAFIR successfully withdrew \$21,520.00

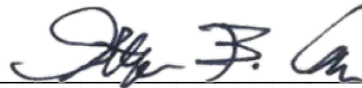
3 CONCLUSION

4 16. Based on the evidence described above, I submit there is probable cause to
5 believe that TRANDAFIR used unauthorized access devices, in the form of victims'
6 EBT account information and PINs, between March 1, 2023 and January 2, 2024, and
7 that his use of these access devices resulted in a loss of over \$1,000.00. In particular,
8 the evidence described above indicates that TRANDAFIR attempted to withdraw
9 \$169,670.00 from the EBT accounts of approximately 181 victims, and that, of this total
10 attempt, he successfully withdrew \$145,250.00. All these unauthorized withdrawals
11 occurred at ATMs located in San Diego County. Based on this evidence, I submit there
12 is probable cause to arrest him for violating 18 U.S.C. § 1029(a)(2), (b)(1), and
13 (c)(1)(A)(i).

14 

15 _____
16 Eugene J. Scherba
17 Special Agent
18 United States Secret Service

19 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
20 by telephone on May 3, 2024.

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22 _____
23 HON. STEVE B. CHU
24 U.S. MAGISTRATE JUDGE