

16. In addition to the \$12 million it received from ThinkTechAct, Empire Cuisine & Market also received more than \$12 million in Federal Child Nutrition Program funds during this same period directly from the two agencies that sponsored its participation in the Federal Child Nutrition Program—Partners in Quality Care and Feeding Our Future. Again, these payments were intended to serve as reimbursements for the cost of providing meals as part of the Federal Child Nutrition Program.

17. In all, bank records show that Empire Cuisine & Market received approximately \$11,346,307 from Partners in Nutrition between May 2020 and January 2022 and an additional approximately \$794,157 from Feeding Our Future between April and June 2021. These funds were deposited into accounts held by Empire Cuisine & Market at U.S. Bank, JP Morgan Chase, and Old National Bank. FARAH was signatory on the accounts.

18. These funds, like the funds from ThinkTechAct, were ostensibly reimbursements for food and meals provided and served by Empire Cuisine & Market as part of the Federal Child Nutrition Program. But, as explained below, little of this money was used to provide food or serve meals. Instead, FARAH misappropriated much of this money. He also sent money to an array of individuals involved in the scheme, including the CEO of ThinkTechAct, Individual M.I. Many of these transactions involved shell companies that appear to have been set up to launder and conceal the proceeds of the fraud scheme.

Entity	Relationship to FARAH	Amount
Empire Enterprises LLC	Owned by FARAH	\$2,310,786
Individual M.J.I.	Co-Owner of Empire Cuisine & Market	\$2,214,089
FARAH		\$1,177,964
Bushra Wholesaler	Owned by FARAH's brother, Individual S.F.	\$1,081,854
MIB Holdings LLC (Individual M.I.)	Owned by CEO of ThinkTechAct	\$915,300
BBI LLC		\$848,978
Individual S.F.	FARAH's brother	\$322,729
Individual M.I.	CEO of ThinkTechAct	\$42,000
Total		\$8,913,700

19. In addition, as explained below, FARAH used millions of dollars in Federal Child Nutrition Programs funds received by Empire Cuisine & Market to purchase real estate and cars.

C. Empire Enterprises LLC

20. As explained above, bank records show that another company owned by FARAH, Empire Enterprises LLC, received approximately \$3,189,199 in Federal Child Nutrition Program funds from ThinkTechAct in 2021. Again, the memo lines on the checks indicate that the money was being paid for the purchase of food or meals from Empire Enterprises.

21. Bank records further show that FARAH also transferred approximately \$2,310,786 in Federal Child Nutrition Program funds from Empire Cuisine & Market to Empire Enterprises between April and July 2021.

22. At first glance, these payments were made to appear as though they were for the purchase of food or meals to be served as part of the Federal Child

Nutrition Program. But this was not true. Bank records show that little or none of the money paid to Empire Enterprises was used to purchase food or meals. Instead, FARAH used Empire Enterprises and its bank accounts to launder and misappropriate Federal Child Nutrition Program funds. He also used the company to kick back misappropriated Federal Child Nutrition Program funds to Individual M.I., the CEO of ThinkTechAct, and others involved in the scheme.

23. Minnesota Secretary of State records show that FARAH formed Empire Enterprises LLC on or about April 5, 2021. FARAH listed his home address in Savage, Minnesota as the registered office address for Empire Enterprises.

24. On or about April 6, 2021—the day after he formed Empire Enterprises—FARAH opened a bank account on behalf of his new company at Old National Bank. FARAH deposited a \$432,796 check from ThinkTechAct into the account on the day he opened it. The memo line indicated that the check was for “CACFP Food.” The check was dated April 3, 2021—two days before FARAH registered Empire Enterprises LLC with the Minnesota Secretary of State.

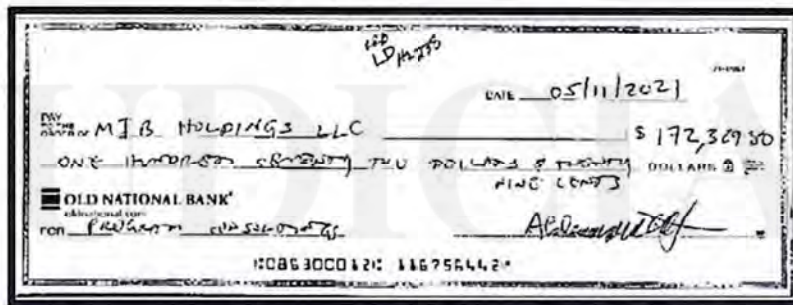
THINKTECHACT FOUNDATION 6452 KILLDEER DR LINO LAKES MN 55014-5162		Date <u>4/3/2021</u>
PAY TO THE ORDER OF	Empire Enterprise LLC	\$ 432,796.00
FOR DEPOSIT ONLY	Four hundred thirty-two Thousand seven hundred	← NO OTHER
USbank.	seventy-six dollars	
MEMO CACFP Food	<i>[Signature]</i>	
⑆091000022⑆ 1047853233791⑆ 64		
LOOK FOR AN FLD-DETERMINE FEDERAL RESERVE NUMBER THE SECURITY FEATURE AND WHAT REACTS WITH ULTRAVIOLET		
04/06/2021		\$432,796.00

25. Approximately two weeks later, on or about April 23, 2021, FARAH wrote a check for \$100,000 to MIB Holdings LLC. The memo line indicated that the payment was for "consulting."



26. According to Minnesota Secretary of State records, MIB Holdings LLC is a company owned by Individual M.I., the CEO of ThinkTechAct.

27. Over the course of the next five weeks, FARAH wrote two more checks to Individual M.I.'s company, MIB Holdings LLC. The memo line on the checks indicated that the payments were for "program consulting" and "program operations."



28. In all, bank records show that FARAH paid approximately \$538,829 to Individual M.I.'s company out of the Empire Enterprises account.

Date	Amount to MIB Holdings	Memo Line
April 23, 2021	\$100,000	Consulting
May 11, 2021	\$172,329	Program Consulting
May 31, 2021	\$266,500	Program operations
Total	\$538,829	

29. FARAH also paid approximately \$915,300 to Individual M.I.'s company, MIB Holdings LLC, out of the Empire Cuisine & Market accounts. All of these funds came from the Federal Child Nutrition Program.

30. These funds were deposited into accounts held by MIB Holdings LLC at Spire Federal Credit Union. Individual M.I. was the sole signatory on the accounts. Individual M.I. appears to have used MIB Holdings LLC and its bank account to launder and conceal misappropriated Federal Child Nutrition Program funds. Bank records show that more than \$1,454,000 in Federal Child Nutrition Program funds were deposited into the accounts from Empire Cuisine & Market LLC and Empire Enterprises LLC.

31. Individual M.I. also deposited \$570,000 into the MIB Holdings LLC's account from Bushra Wholesalers LLC, an entity created by FARAH's brother, Individual S.F. The checks indicated that the payments were for "consulting."

Date (approximate)	Memo Line	Amount from Bushra Wholesalers to MIB Holdings
July 7, 2021	Consulting	\$189,000
August 9, 2021	Consulting Program Management	\$221,456

September 3, 2021	Program Mgmt/Consulting	\$159,800
	Total	\$570,256

32. But these payments, which occurred between July and September 2021, appear to have been designed to launder misappropriated Federal Child Nutrition Program funds received by ThinkTechAct and create the false impression that funds were being used to purchase food. Specifically, bank records show that Individual M.I. had previously paid \$1,392,322 in Federal Child Nutrition Program funds from ThinkTechAct to Bushra Wholesalers LLC from between February and July 2021. The memo line on the checks indicated that the payments were for food.

Date (approximate)	Memo line	Amount from ThinkTechAct to Bushra Wholesalers
February 16, 2021	Food storage	\$100,000
February 24, 2021	Food	\$15,000
February 26, 2021	Food	\$40,000
June 11, 2021	CACFP Food	\$212,061
June 18, 2021	CACFP Food	\$212,061
June 22, 2021	CACFP Food	\$289,750
June 25, 2021	CACFP Food	\$228,950
July 27, 2021		\$294,500
	Total	\$1,392,322

33. Bank records show that little or none of this money sent to MIB Holdings LLC was used to purchase food or provide meals to underprivileged children. Instead, Individual M.I. converted the money to his own personal use. For example, in 2021, Individual M.I. sent \$620,000 in Federal Child Nutrition Program funds from MIB Holdings LLC to a custom home builder in Columbus, Ohio.

34. Records obtained from the home builder show that Individual M.I. made these payments for the construction of a new home on an empty lot in Lewis Center, Ohio. The total price of the project was approximately \$936,000.

35. Individual M.I. also sent approximately \$30,000 from MIB Holdings LLC to Coinbase.com, a cryptocurrency exchange, in May and June of 2021.

D. Empire Cuisine & Market Received approximately \$2.5 million in Federal Child Nutrition Program funds from a Company Created by a Member of the Partners in Nutrition Board of Directors

36. Bank records show that Empire Cuisine & Market received approximately \$2.5 million in Federal Child Nutrition Program funds from a company called The Free Minded Institute. As explained below, The Free Minded Institute was created and controlled by Individual J.S., who is a member of the board of directors of Partners in Quality Care, d/b/a Partners in Nutrition, the entity that sponsored Empire Cuisine & Market's participation in the Federal Child Nutrition Program.

37. Minnesota Secretary of State records show that Individual J.S. created The Free Minded Institute on or about July 29, 2021.

38. MDE records show that Individual J.S. is a member of the board of directors of Partners in Quality Care, d/b/a Partners in Nutrition. Individual J.S. also works as an employee of Partners in Nutrition in a "Site Support" position.

39. In or about October 2021, Individual J.S. opened a bank account on behalf of The Free Minded Institute. The address listed on the account is a single-family home located on the 600 block of Iglehart Avenue in St. Paul, Minnesota.

Individual J.S.'s grandmother lives in the home. On or about May 18, 2022, federal agents spoke with Individual J.S.'s grandmother. She said that Individual J.S. receives mail at the residence but that he does not live there. She said that she had never heard of The Free Minded Institute.

40. Approximately two months after being formed, The Free Minded Institute began receiving Federal Child Nutrition Program funds from Partners in Nutrition. Bank records show that The Free Minded Institute received approximately \$2,496,989 in Federal Child Nutrition Program funds from Partners in Nutrition between approximately October 2021 and January 2022. All of the money deposited into The Free Minded Institute's bank account was Federal Child Nutrition Program funds from Partners in Nutrition.

41. Bank records show that The Free Minded Institute sent almost all of the Federal Child Nutrition Program funds it received from Partners in Nutrition to Empire Cuisine & Market or its owner, FARAH. For example, on or about November 12, 2021, Individual J.S. wrote a \$595,000 check from The Free Minded Institute to Empire Cuisine for "October Food Service." Similarly, on or about January 14, 2022, Individual J.S. wrote a check for \$850,000 from The Free Minded Institute to Empire Cuisine & Market for "Dec. Catering."

42. In all, bank records show that Empire Cuisine & Market and FARAH received approximately \$2,428,030 from The Free Minded Institute between October 2021 and January 2022. This represented more than 97 percent of the

Federal Child Nutrition Program funds that The Free Minded Institute received from Partners in Nutrition.

43. For his part, Individual J.S. withdrew approximately \$13,400 in cash from The Free Minded Institute's account between November 2021 and February 2022. He also spent approximately \$3,500 on restaurants and meals, more than \$900 on GoPuff.com, an online food and alcohol delivery company, and more than \$1,000 at liquor stores.

44. FARAH and his companies, in turn, sent money to Individual J.S. On or about July 31, 2021—just two days after registering The Free Minded Institute with the Minnesota Secretary of State—Individual J.S. received a \$1,000 check from Empire Cuisine & Market. The memo line on the check indicated that the payment was for “program consulting.” Approximately two weeks later, on or about August 13, 2021, Individual J.S. received an additional \$10,000 in “Associate Fees” from Empire Enterprises LLC.

45. On or about November 2, 2021, the manager of Empire Cuisine & Market, Individual A.N., sent an email with the subject line “FMI October Invoice” to the executive director of Partners in Nutrition. Individual J.S. was copied on the email. Attached to the email was an invoice from The Free Minded Institute to Partners in Nutrition dated November 10, 2021. The invoice claimed that The Free Minded Institute was entitled to approximately \$679,507 in Federal Child Nutrition Program funds from Partners in Nutrition for having provided more than 150,000 meals at seven federal child nutrition program sites.

The Free Minded Institute

INVOICE
Submitted on 11/02/2021

Invoice for Partners in Quality Care 1035 West 7th Street St. Paul, MN 55102	Invoice # 8022021
Project CACFP	Due date 11/10/2021

Description	Qty	Unit price	Total price
Betel A fan Oromo	46,859	\$4.25	\$199,150.75
Cedar Cultural	30,186	\$4.25	\$128,290.50
Shamrock Court	8,908	\$4.25	\$37,859.00
La Cruz	29,713	\$4.25	\$126,280.25
Marshall Islamic Center	12,929	\$4.25	\$54,948.25
Somali Athletic Club	16,169	\$4.25	\$68,718.25
Sunrise Mobile	15,120	\$4.25	\$64,260.00

Notes

Subtotal	\$679,507.00
Adjustments	\$0.00
	\$679,507.00

46. Approximately one minute after that November 2, 2021 email was sent, Individual A.N. sent an email with the subject line "Empire October Invoice" to Individual J.S. Attached to the email was an invoice from Empire Cuisine & Market to The Free Minded Institute dated November 10, 2021. The invoice claimed that The Free Minded Institute owed Empire Cuisine & Market approximately \$642,733 for providing those same 150,000 meals at federal child nutrition program sites.

Empire Causine & Market			
232 Marshall Rd. Shakopee, MN 55379 952-658-6548			
INVOICE			
Submitted on 11/02/2021			
Invoice for		Invoice #	
The Free Minded Institute		8022023	
Project		Due date	
CACFP		11/10/2021	
Description	Qty	Unit price	Total price
Betel Afan Oromo	46,859	\$4.02	\$188,373.18
Cedar Cultural	30,186	\$4.02	\$121,347.72
Shamrock Court	8,908	\$4.02	\$35,810.16
La Cruz	29,713	\$4.02	\$119,446.26
Marshall Islamic Center	12,929	\$4.02	\$51,974.58
Somali Athletic Club	16,169	\$4.02	\$64,999.38
Sunrise Mobile	15,120	\$4.02	\$60,782.40
Notes			Subtotal \$642,733.68
			Adjustments \$0.00
			\$642,733.68

47. This represented approximately 5 percent less than the invoice that The Free Minded Institute submitted to Partners in Nutrition, suggesting that Individual J.S. was going to be keeping approximately 5 percent of the Federal Child Nutrition Programs received from Partners in Nutrition.

E. FARAH and his Companies Received more than \$30 Million in Federal Child Nutrition Program Funds

48. In all, bank records show that FARAH's companies received more than \$32 million in Federal Child Nutrition Program funds between approximately May 2020 and January 2022. This included more than \$15 million in payments from ThinkTechAct as well as nearly \$13 million in payments from Partners in Quality Care and Feeding Our Future. Federal Child Nutrition Program funds represented more than 90 percent of the total deposits into the companies' bank accounts.

49. A review of these accounts shows that most of this money was not used to buy food or other items related to participation in the Federal Child Nutrition Program. Instead, the most significant withdrawals from the Empire Cuisine & Market bank accounts were to limited liability companies controlled by Empire Cuisine & Market owners. This money was then used to purchase real estate, vehicles, and to send money abroad.

F. FARAH Used Fraudulently Obtained and Misappropriated Federal Child Nutrition Program Funds to Purchase Real Estate

50. Bank records show that FARAH used millions of dollars in Federal Child Nutrition Program funds to purchase houses and other real estate.

1. FARAH Used \$575,000 in Federal Child Nutrition Program Funds to Purchase a Home in Savage, Minnesota

51. FARAH used Federal Child Nutrition Programs funds from the Empire Enterprises LLC account to purchase a single-family home located at 15418 Hampshire Lane in Savage, Minnesota.



52. FARAH currently resides at 15418 Hampshire Lane as of January 2022.

53. Bank records show that on or about April 15, 2021, FARAH transferred \$575,000 from the Empire Enterprises LLC account at Old National Bank to Trademark Title Services. The wire transfer documents indicated that the funds were for the purchase of 15418 Hampshire Lane, Savage, Minnesota.

54. All of the funds used to purchase 15418 Hampshire Lane were derived from Federal Child Nutrition Program funds. After being received from the sponsoring entity, the funds were transferred to one or more other companies in an effort to launder and conceal the source of the funds.

2. FARAH Purchased Two Lots on Prior Lake for More than \$1 Million

55. FARAH purchased two lakefront lots on Prior Lake for more than \$1 million using misappropriated Federal Child Nutrition Program funds.

56. FARAH purchased these lots with a \$1,041,992 check from Empire Enterprises LLC. The check, dated July 7, 2021, was payable to Trademark

Title Services. The addresses "5594 & 5604 Candy Cove Trail SE, Prior Lake, MN" were handwritten on the check.

REMITTER		OLD NATIONAL BANK	1943086
EMPIRE ENTERPRISES		BRANCH # <u>1038</u> YOUR Bank, For life.	DATE July 7, 2021
PAY TO THE ORDER OF		TRADEMARK TITLE SERVICES**	\$1,041,986.08
5594 & 5604 Candy Cove Trail SE Prior Lake, MN		**One Million Forty One Thousand Nine Hundred Eighty Six Dollars and Eight Cents	
CASHIER'S CHECK		NAME AND TITLE	
21-3085		BRITTANY LAW, RD	
⑈ 1943086 ⑈ ⑆08663000⑆2⑆ ⑈⑈902000705⑈		PRINTED NAME AND TITLE	

57. A review of bank records shows that all of the money used to obtain this cashier's check was derived from fraudulently obtained Federal Child Nutrition Program funds received by ThinkTechAct Foundation or Empire Enterprises LLC.

58. This check was used to purchase two lakefront lots on Prior Lake. These lots are located in an upscale residential neighborhood on Prior Lake. According to Minnesota Department of Revenue records, Empire Enterprises LLC purchased these lots on or about July 26, 2021, for \$1.1 million in cash.

3. FARAH Sent \$1.5 Million in Federal Child Nutrition Program Funds to a Custom Home Builder

59. In 2021, FARAH paid \$1.5 million to a company that specializes in custom home building and remodeling in the south and southwestern metro area. According to records obtained pursuant to grand jury subpoena, the money was to be used to build an 8,000-square foot custom home for FARAH on the two lakefront lots he purchased on Prior Lake. The building plans refer to the project as "The Farah Residence" and indicate that FARAH is the homeowner. According to records

obtained from the builder, the Farah Residence was projected to cost approximately \$2.5 million.



60. Bank records show that FARAH used Federal Child Nutrition Program funds to pay the custom home builder, including:

a. a \$500,000 check from the Empire Cuisine & Market LLC account at Old National Bank on or about March 19, 2021;

b. a \$150,000 check for “project construction” from the Empire Cuisine & Market LLC account at Old National Bank on or about July 8, 2021; and

c. a \$250,000 check for “construction” from the Old National Bank account on or about May 15, 2021.

4. In October 2021 FARAH Purchased a Townhouse in Burnsville, Minnesota, for \$335,000 in Federal Child Nutrition Program Funds

61. In or about October 2021, FARAH purchased a townhouse in Burnsville, Minnesota, using Federal Child Nutrition Program funds. The townhouse was located at 438 Stonewood Lane, Burnsville, Minnesota.

62. FARAH signed a purchase agreement to buy 438 Stonewood Lane on or about September 26, 2021. The purchase price was \$335,000. Empire Enterprises LLC was listed as the buyer. FARAH signed the purchase documents as the “Chief Manager” of Empire Enterprises LLC.

63. Bank records show that on or about October 12, 2021, FARAH wired approximately \$334,632 from an account held by Empire Enterprises LLC at JP Morgan Chase to Trademark Title Services. This money funded the purchase of 438 Stonewood Lane. Bank records show that the money in the account was traceable to Federal Child Nutrition Program funds.

5. FARAH Sent \$1 Million to a Kentucky LLC for use in Purchasing Real Estate in Louisville, Kentucky

64. FARAH also sent approximately \$1 million from Empire Cuisine & Market to BBI LLC, a Kentucky limited liability company, in 2021. The money was used to purchase real estate in Louisville, Kentucky.

65. Kentucky Secretary of State records show that BBI LLC was created on or about March 22, 2021. Approximately ten days later, on or about April 2, 2021,

FARAH wrote a check for \$345,500 from Empire Cuisine & Market to BBI LLC. Over the next several months, FARAH wrote several more checks to BBI LLC. In all, FARAH sent approximately \$1,032,687 to BBI LLC—approximately \$996,000 from Empire Cuisine & Market and another \$35,000 from a personal account. Bank records show that essentially all of the money in the BBI LLC were Federal Child Nutrition Program funds from FARAH.¹

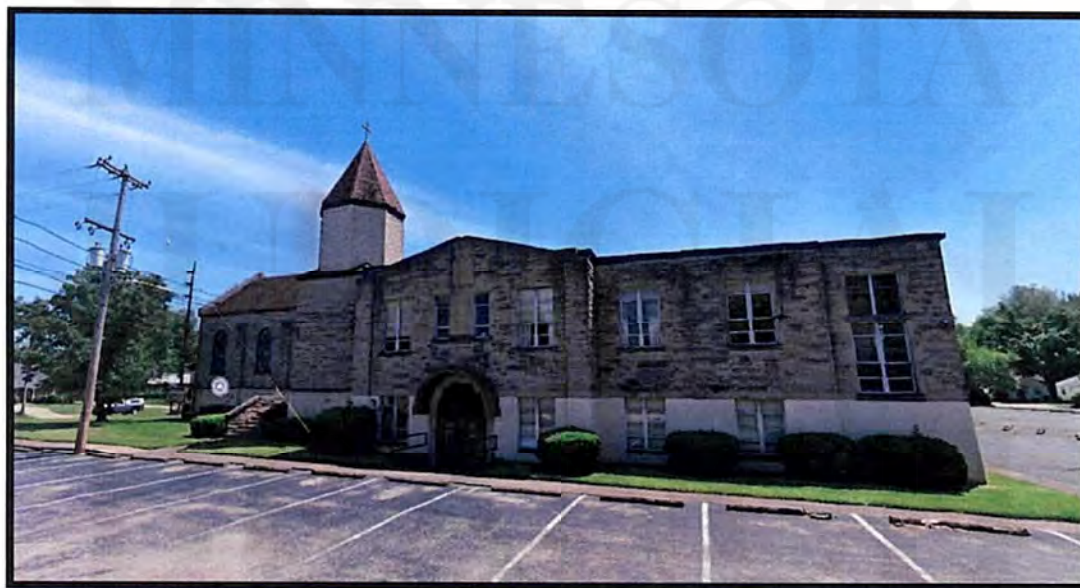
66. BBI LLC used money it had received from FARAH to purchase real estate in Louisville, Kentucky. In May 2021, BBI LLC purchased a commercial building located at 3847 Cane Run Road in Louisville, Kentucky, for approximately \$208,091.



67. In October 2021, BBI LLC used money it received from FARAH to purchase an old church located at 6200 South 3rd Street in Louisville, Kentucky. According to closing records, BBI LLC paid approximately \$10,000 earnest money

¹ Another entity involved in the scheme, Bushra Wholesalers, also sent approximately \$56,332 to BBI LLC. As discussed above, Bushra Wholesalers was a company created by FARAH's brother to obtain, launder, and misappropriate Federal Child Nutrition Program funds obtained by ThinkTechAct and FARAH's companies.

and signed over to the closing attorney four checks totaling approximately \$436,293 it had received from FARAH. The property was titled to "Masjid Bilal Islamic Center Inc." and is encumbered by a promissory note payable to BBI LLC.



G. FARAH Purchased Five Cars Using Federal Child Nutrition Program Funds in 2021

68. The investigation has revealed that FARAH purchased at least five cars in 2021 using funds derived from the Federal Child Nutrition Program.

1. FARAH purchased a 2021 Jeep Wrangler in May 2021

69. On or about May 15, 2021, FARAH purchased a 2021 Jeep Wrangler Unlimited for approximately \$79,000. FARAH purchased the car using a \$79,389 check from an account held by Empire Cuisine & Market LLC.

70. A review of bank records show that Federal Child Nutrition Program funds were used to purchase this jeep.

2. FARAH purchased a 2021 Porsche Macan in August 2021

71. In August 2021, FARAH traded in his Jeep Wrangler for credit towards the purchase of a 2021 Porsche Macan SUV. Records obtained from the car dealership show that FARAH purchased the Porsche Macan for approximately \$79,000. FARAH received a \$63,000 trade-in allowance for the Jeep Wrangler. He funded the balance of the purchase price with a \$29,095 check from an Empire Cuisine & Market account.

72. Minnesota Department of Motor Vehicle records show that FARAH is the registered owner of the 2021 Porsche Macan.

73. A review of bank records show that the funds FARAH used to purchase both the Jeep Wrangler and the Porsche Macan were traceable to Federal Child Nutrition Program funds.

3. FARAH Purchased a 2021 GMC Sierra Pickup Truck in August 2021

74. In August 2021, FARAH purchased a 2021 GMC Sierra pickup truck using \$65,000 in Federal Child Nutrition Program funds. FARAH purchased the GMC Sierra pickup truck using a \$65,005 check from Empire Cuisine & Market LLC.

75. According to Minnesota Department of Motor Vehicle records, the GMC Sierra is registered to Empire Cuisine & Market.

76. Again, bank records show that the money used to purchase this truck was derived from the Federal Child Nutrition Program.

4. FARAH purchased a 2021 Nissan Murano SUV in October 2021

77. In October 2021, FARAH purchased a 2021 Nissan Murano luxury SUV using Federal Child Nutrition Program funds.

78. Specifically, bank records show that on or about October 30, 2021, FARAH wrote a \$47,019 check from an Empire Cuisine & Market account at JP Morgan Chase to the Luther Nissan Kia dealership in Inver Grove Heights, Minnesota. The check was used to purchase a 2021 Nissan Murano SUV.

79. Minnesota Department of Motor Vehicle records show that the vehicle is registered to Empire Cuisine & Market LLC. FARAH's name is also listed on the vehicle's title.

5. FARAH Purchased a 2022 Tesla Model Y Sedan in December 2021

80. FARAH also purchased a 2022 Tesla Model Y sedan for approximately \$80,000 in December 2021.

81. Bank records show that FARAH paid for the Tesla via a \$80,753 debit card transaction through his personal bank account at JP Morgan Chase. A review of bank records show that the funds in this account prior to this debit card transaction were traceable to Federal Child Nutrition Program funds.

H. The Government Seized More than \$6 Million in Fraud Proceeds from FARAH on January 20, 2022

82. In January 2022, federal agents obtained federal seizure warrants to seize the funds in accounts held by FARAH and his entities, Empire Cuisine & Market LLC and Empire Enterprises LLC, on the grounds that the funds were proceeds of the scheme to fraudulently obtain, launder, and misappropriate Federal Child Nutrition Program funds. Federal agents executed these warrants on January 20, 2022. In all, agents seized approximately \$6,172,242 from these accounts.

Bank	Account Holder	Amount Seized (approximate)
JP Morgan Chase	Empire Cuisine & Market LLC	\$4,000,422
JP Morgan Chase	Empire Enterprises LLC	\$1,286,805
JP Morgan Chase	ABDIAZIZ SHAFII FARAH	\$460,319
US Bank	Empire Cuisine & Market LLC	\$424,695
	Total	\$6,172,241

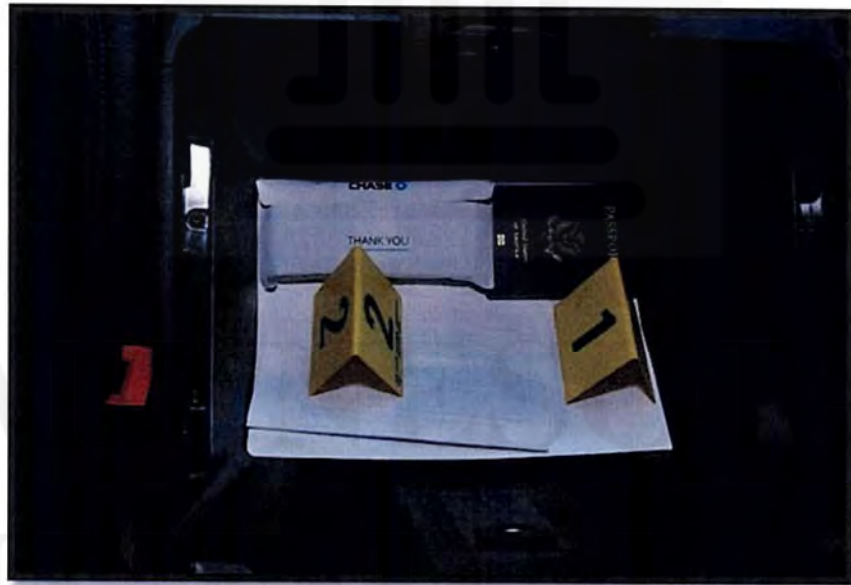
83. FARAH was the sole signatory on each of these accounts.

I. Federal Agents Seized Four Vehicles and More than \$65,000 in Cash from FARAH's Residence in January 2022

84. Federal agents also executed a search warrant at FARAH's home in Savage, Minnesota, on January 20, 2022. During the search, agents found parked at the residence four of the vehicles that FARAH had purchased using Federal Child

Nutrition Program funds—the 2021 Porsche Macan, the 2021 Nissan Murano, the 2021 GMC Sierra, and the 2022 Tesla Model Y. Federal agents seized each of these vehicles.

85. In the course of seizing the 2021 GMC Sierra pickup truck, agents conducted an inventory search of the truck. During the inventory search, agents found FARAH's U.S. passport and an envelope containing approximately \$18,000 in cash in the center console of the vehicle



86. Agents also found a laptop bag in the rear passenger seat of the vehicle. There was approximately \$42,500 in cash inside of the laptop bag.



J. FARAH Sent More than \$1.5 Million in Federal Child Nutrition Program Funds to Kenya and China in 2021

87. During the search of FARAH's residence, agents recovered receipts for more than \$800,000 in international wire transfers from entities controlled by FARAH to entities in China. Bank records show that all of the money sent to China was traceable to Federal Child Nutrition Program funds.

Date	Source of Wire	Beneficiary Location	Amount
February 18, 2021	Empire Cuisine & Market LLC	Qingdao Saftco Tire Co., Ltd Qingdao, China	\$131,632
March 1, 2021	Empire Cuisine & Market LLC	Prinx Chengshan (Shandong) Tire Co., Ltd. Rongchen City, China	\$80,000
March 31, 2021	Empire Cuisine & Market LLC	Prinx Chengshan (Shandong) Tire Co., Ltd. Rongchen City, China	\$189,787
May 6, 2021	Empire Enterprises LLC	Prinx Chengshan (Shandong) Tire Co., Ltd. Rongchen City, China	\$197,789
May 14, 2021	Empire Enterprises LLC	Junan Lishun Arts and Craft Co. Ltd. Shandong, China	\$227,582
		Total	\$826,790

88. FARAH was listed as the authorized signer for each of these international wire transfers.

89. Bank records show that FARAH made additional wire transfers to China that were unrelated to food purchases. On or around March 12, 2021, \$216,728 was wired from the Empire Cuisine & Market LLC account at Old National Bank to Jiangxi Enda Linen Co. Ltd. in Jiangxi, China. On or about March 23, 2021, FARAH wired \$197,872 from Empire Cuisine & Market LLC to Bright Element Limited in Hong Kong to “purchase diesel engines.”

90. Agents also recovered records of international wire transfers from entities controlled by FARAH to Nairobi, Kenya. The first receipt showed that on or about May 11, 2021, FARAH transferred \$300,000 from an account held by Empire Enterprises LLC to Capital View Properties LLC in Nairobi, Kenya. The wire receipt listed FARAH as the authorized signer on the account.

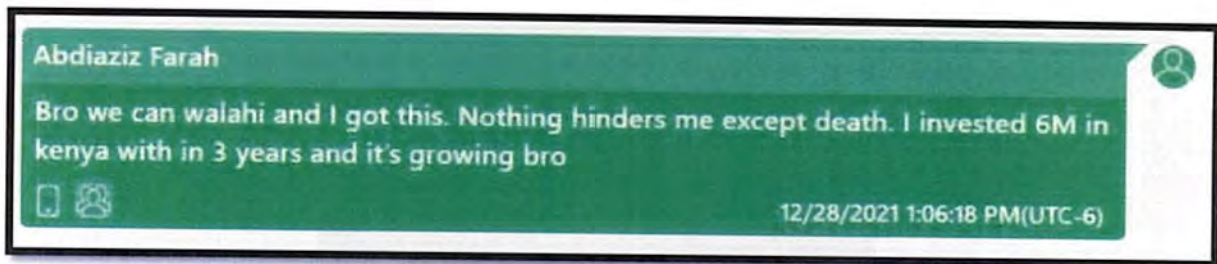
91. Agents also recovered a June 1, 2021, receipt documenting a \$206,428 wire transfer from Empire Enterprise LLC account at Old National Bank to Capital View Properties LLC in Nairobi, Kenya. Again, the wire receipt listed FARAH as the authorized signer on the account.

92. Bank records show that FARAH wired an additional \$204,795 from Empire Enterprises to Capital View Properties in Nairobi, Kenya, on or about May 4, 2021.

93. In all, bank records show that FARAH wired more than \$700,000 from Empire Enterprises to Nairobi, Kenya, in 2021.

Date	Source of Wire	Beneficiary	Amount (approximate)
May 4, 2021	Empire Enterprises LLC	Capital View Properties Nairobi, Kenya	\$204,795
May 11, 2021	Empire Enterprises LLC	Capital View Properties Nairobi, Kenya	\$300,000
June 1, 2021	Empire Enterprises LLC	Capital View Properties Nairobi, Kenya	\$206,428
		Total	\$711,223

94. In addition to these transfers, FARAH told Individual M.I. that he has invested \$6 million in Kenya over the past three years. During the search of FARAH's residence, agents recovered his cell phone. A search of his cell phone shows that FARAH exchanged messages with Individual M.I. over the WhatsApp messaging app. In a message sent on or about December 28, 2021, FARAH told Individual M.I. that he had invested \$6 million in Kenya over the past three years.



K. FARAH made False Statements on his Application for a New U.S. Passport

95. The current investigation became public on January 20, 2022, when federal agents executed search warrants at more than 20 locations around the Twin Cities, including FARAH's home in Savage and the office of Empire Cuisine & Restaurant in Shakopee.

96. During the execution of the search warrant on FARAH'S residence in Savage, federal agents seized FARAH's U.S. passport card. At the conclusion of the search, agents provided FARAH with a receipt detailing the property seized from his residence. This inventory list specified that agents had seized "US Passport Card Abdiaziz S. Farah XXXX2274."

97. As noted above, agents also seized a truck belonging to FARAH on January 20, 2022. During an inventory of the truck's contents, agents found FARAH's U.S. passport book.

98. In the wake of the search warrants, the press has regularly covered the scheme to fraudulently obtain Federal Child Nutrition Program funds. This press coverage has included FARAH's role in the scheme. According to an article published on February 3, 2022, FARAH founded and ran a charter school in Burnsville,

Minnesota,² Individual M.I., the owner of ThinkTechAct Foundation, previously served on the charter school's board of directors. The article reported that FARAH took a leave of absence effective January 21, 2022, the day after his role in the scheme became public.

99. On or about March 22, 2022, FARAH applied for a new U.S. Passport. He submitted his application to the Minneapolis Passport Agency in Minneapolis, Minnesota. According to his application, FARAH was born in Mogadishu, Somalia and became a naturalized U.S. citizen in 2012.


100. FARAH's application indicated that he had previously been issued both a U.S. passport book and a U.S. passport card. FARAH indicated on the application that his most recent U.S. passport card had been lost.

101. FARAH also submitted a Statement Regarding a Lost or Stolen U.S. Passport Book and/or Card, known as Form DS-64, as part of his U.S. passport application. On the Form DS-64, FARAH falsely represented that he had lost his U.S. passport. FARAH explained that he "could not find anywhere in my house or car." In the box asking him to "[e]xplain where the loss or theft occurred," FARAH said "unknown." Similarly, in the box asking when the passport was lost or stolen, FARAH stated "unknown."

² <https://sahanjournal.com/education/feeding-our-future-abdiaziz-farah-mahad-ibrahim/> (last accessed May 20, 2022).

2. VALID LOST OR STOLEN U.S. PASSPORT BOOK/CARD INFORMATION	
<p><small>Answer all questions completely. If you do not know the answer in detail, be as exact as possible.</small></p> <p><small>The passport book and card have different numbers. Please provide the correct number(s) if known. The passport number on a lost or stolen passport cannot be reused.</small></p> <p>Explain in detail how your valid U.S. passport book/card was lost or stolen. Include a photocopy of the valid passport book/card if available.</p> <p>I could not find anywhere in my house or car.</p>	
<p>Explain where the loss or theft occurred. Provide the address, if known (City and State, if in the U.S., or City and Country as it is presently known)</p> <p>UNKNOWN</p>	
<p>On what date was your valid U.S. passport book/card lost or stolen (mm-dd-yyyy)? If unknown, when was the last time you remember it being in your possession?</p> <p>UNKNOWN</p>	

102. FARAH signed the Form DS-64 under penalty of perjury.

3. YOU MUST SIGN AND DATE THE APPLICATION IN THE DESIGNATED AREA BELOW	
<p>I, the undersigned, declare under penalty of perjury all of the following: 1) that I have read and understand the warning on page one of this form; 2) the information provided herein is correct and complete; 3) I have not given my U.S. passport book and/or passport card to another person or disposed of it in an unauthorized manner; 4) I understand that the U.S. passport(s) I report as missing will be invalidated and cannot be used; and 5) if I subsequently find and recover it, I will immediately return the passport book and/or passport card to Passport Services at the address on page one of this form or to the nearest U.S. passport agency, U.S. embassy or U.S. consulate if abroad, and I will not attempt to use it.</p>	
<p> Applicant's Legal Signature - age 16 or older</p>	<p>03/16/2022 Date (mm/dd/yyyy)</p>

103. Based on FARAH's application, the U.S. Department of State issued FARAH a new U.S. passport on March 22, 2022.

104. On or about March 16 2022, FARAH booked a one-way flight from Minneapolis-St. Paul International Airport to Nairobi, Kenya (via Newark International Airport and John F. Kennedy International Airport). The flight was scheduled to depart on March 24, 2022. FARAH did not board the flight.

105. On or about May 19, 2022, federal agents conducted surveillance at FARAH's store, Empire Cuisine & Market. At approximately 11:00 a.m. on May 19, 2022, agents observed FARAH enter the store. At approximately 12:15 p.m., agents observed an unidentified man enter the store. The man appeared to be carrying a stack of passports.



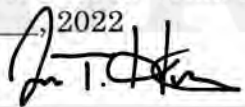
II. CONCLUSION

106. Based on the facts set forth above, and based on my training, experience, knowledge, and the aforementioned facts of this investigation, there is probable cause to believe that ABDIAZIZ SHAFII FARAH has violated 18 U.S.C. § 1542 (false statement in passport application).

Respectfully submitted,


 FBI Special Agent Travis Wilmer

SUBSCRIBED and SWORN before me by reliable
 electronic means (FaceTime and email)
 pursuant to Fed. R. Crim. P. 41(d)(3)
 on May 20, 2022 May 20, 2022


 The Honorable Jon T. Huseby
 United States Magistrate Judge

UNITED STATES DISTRICT COURT

for the
District of Minnesota

United States of America

v.

Aimee Marie Bock (1)

)
)
)
)
)
)

Case No. CR 22-223 MJD/DTS

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Aimee Marie Bock

who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

Pretrial Release Violation Petition

Count 1 – Conspiracy to Commit Wire Fraud, 18:371; Count 2, 4, 5, 12 – Wire Fraud, 18:1343; Count 15 – Conspiracy to Commit Federal Programs Bribery, 18:371; Count 40 – Federal Programs Bribery, 18:666(a)(1)(B) and (a)(2).

Date: 9/13/2022



Fogarty

Issuing officer's signature

City and state: Minneapolis, MN

Kate M. Fogarty, Clerk of Court

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (name, relation, address, phone number): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): _____

Date of last contact with pretrial services or probation officer (if applicable): _____

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 22-223 MSD/DTS
INDICTMENT

UNITED STATES OF AMERICA,

Plaintiff,

v.

18 U.S.C. § 371
18 U.S.C. § 666
18 U.S.C. § 1343
18 U.S.C. § 1956
18 U.S.C. § 1957

1. AIMEE MARIE BOCK,
2. ABDIKERM ABDELAHI EIDLEH,
3. SALIM AHMED SAID,
4. ABDULKADIR NUR SALAH,
5. AHMED SHARIF OMAR-HASHIM,
also known as "Salah Donyale,"
6. ABDI NUR SALAH,
7. ABDIHAKIM ALI AHMED,
8. AHMED MOHAMED ARTAN,
9. ABDIKADIR AINANSHE MOHAMUD,
also known as "AK,"
10. ABDINASIR MAHAMED ABSHIR,
11. ASAD MOHAMED ABSHIR,
12. HAMDY HUSSEIN OMAR,
13. AHMED ABDULLAHI GHEDI, and
14. ABDIRAHMAN MOHAMUD AHMED,
also known as "Chef Abcos,"

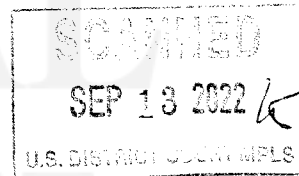
Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

At times relevant to the indictment:

INTRODUCTION

1. The defendants devised and carried out a massive scheme to defraud the federal child nutrition program, a program designed to provide free meals to children in need. The defendants obtained, misappropriated, and laundered millions of dollars in program funds that were intended as reimbursements for the cost of serving meals to children. The defendants exploited changes in the program intended to ensure



underserved children received adequate nutrition during the Covid-19 pandemic. Rather than feed children, the defendants took advantage of the Covid-19 pandemic—and the resulting program changes—to enrich themselves by fraudulently misappropriating millions of dollars in federal child nutrition program funds.

A. Background on the Federal Child Nutrition Program

2. The Food and Nutrition Service is an agency of the United States Department of Agriculture (USDA) that administers various federal child nutrition programs, including the Summer Food Service Program and Child and Adult Care Food Program (together “the Federal Child Nutrition Program”).

3. The Summer Food Service Program (SFSP) is a federal program established to ensure that children continue to receive nutritious meals when school is not in session. The Summer Food Service Program reimburses non-profit organizations and other participating entities that serve free healthy meals and snacks to children and teens in low-income areas.

4. The Child and Adult Care Food Program (CACFP) is a federal program that reimburses non-profit organizations and other participating entities that serve healthy meals and snacks to children and adults at participating childcare centers, daycares, and after-school programs.

5. The Federal Child Nutrition Program operates throughout the United States. The USDA’s Food and Nutrition Service administers the program at the national and regional levels by distributing federal funds to state governments, which provide oversight over the Federal Child Nutrition Program.

6. The Minnesota Department of Education (MDE) administers the Federal Child Nutrition Program in Minnesota.

7. Meals funded by the Federal Child Nutrition Program are served by “sites.” Each site participating in the Federal Child Nutrition Program must be sponsored by a sponsoring organization that is authorized to participate in the Federal Child Nutrition Program. Sponsors are required to submit an application to MDE for each site. Sponsors are responsible for monitoring each of their sites and preparing reimbursement claims for their sites.

8. Sponsors submit reimbursement claims to MDE on behalf of sites under their sponsorship. The USDA then provides federal reimbursement funds on a per-meal basis. MDE provides the federal funds to the sponsoring agency, which in turn pays the reimbursements to the sites under its sponsorship. The sponsoring agency retains 10 to 15 percent of the funds as an administrative fee in exchange for sponsoring the sites, submitting reimbursement claims, and disbursing the federal funds.

9. Historically, the Federal Child Nutrition Program has generally functioned by providing meals to children involved in educational-based programs or activities. During the Covid-19 pandemic, however, the USDA waived some of the standard requirements for participation in the Federal Child Nutrition Program. Among other things, USDA allowed for-profit restaurants to participate in the program. It also allowed for off-site food distribution to children outside of educational programs. At the same time, the state government’s stay-at-home order and telework

policies made it more difficult to oversee the program. These changes left the program vulnerable to fraud and abuse.

B. The Defendants and Their Roles

10. Defendant AIMEE MARIE BOCK was the founder and executive director of Feeding Our Future, a non-profit organization in the business of helping community partners participate in the Federal Child Nutrition Program and related federal programs. Feeding Our Future was an approved sponsor of the Federal Child Nutrition Program. As a sponsor, Feeding Our Future was responsible for submitting site applications to MDE for approval, monitoring active sites, submitting claims for reimbursement from MDE, and disbursing federal funds to sites under its sponsorship. Feeding Our Future received payment from MDE and kept an administrative fee—typically 10 to 15 percent. Feeding Our Future provided the remaining funds directly to sites.

11. Defendant ABDIKERM ABDELAHI EIDLEH was an employee of Feeding Our Future who was responsible for recruiting and supporting Federal Child Nutrition Program sites under Feeding Our Future's sponsorship.

12. Defendants SALIM AHMED SAID, ABDULKADIR NUR SALAH, and ABDIRAHMAN MOHAMUD AHMED, also known as "Chef Abcos," owned Cosmopolitan Business Solutions LLC, the entity that ran Safari Restaurant in Minneapolis. Safari Restaurant had approximately \$600,000 in annual revenue in each of the three years (2017-2019) prior to the onset of the Covid-19 pandemic. Safari Restaurant enrolled in the Federal Child Nutrition Program in April 2020 under the sponsorship of Feeding Our Future. Safari Restaurant also operated as a vendor

purporting to deliver food and meals to be served at other Federal Child Nutrition Program sites.

13. Defendants ABDIHAKIM ALI AHMED, SALIM SAID, and AHMED ABDULLAHI GHEDI created ASA Limited LLC in September 2020. ABDIHAKIM AHMED, SALIM SAID, and AHMED GHEDI were equal 33% partners in the company. ASA Limited opened federal child nutrition program sites in St. Paul, Minnesota, including a site on McKnight Road (the “ASA Limited site”).

14. Defendant AHMED SHARIF OMAR-HASHIM, also known as “Salah Donyale,” created a company called Olive Management Inc. in or about September 2020. Olive Management opened a federal child nutrition program site in St. Cloud, Minnesota (the “Olive Management site”).

15. Defendants ABDULKADIR NUR SALAH and AHMED OMAR-HASHIM operated Total Financial Solutions, a company that provided payroll and bookkeeping services to many of the companies involved in the fraud scheme.

16. Defendants ABDULKADIR NUR SALAH, ABDI NUR SALAH, and AHMED MOHAMED ARTAN, registered Stigma-Free International, a non-profit entity used to carry out the scheme. Stigma-Free International opened up several Federal Child Nutrition Program sites around the state of Minnesota, including in Willmar, Mankato, St. Cloud, Waite Park, and St. Paul.

17. Defendant ABDIKADIR AINANSHE MOHAMUD, also known as “AK,” ran the Stigma-Free site in Willmar, a small town in west-central Minnesota with a total population of approximately 21,000 (the “Stigma-Free Willmar site”).

18. Defendants ABDINASIR MAHAMED ABSHIR and ASAD MOHAMED ABSHIR ran the Stigma-Free site in Mankato, a mid-sized city in southwestern Minnesota (the “Stigma-Free Mankato site”).

19. Defendant HAMDY HUSSEIN OMAR ran the Stigma-Free site in Waite Park, a suburb of St. Cloud, Minnesota (the “Stigma-Free Waite Park site”).

20. Bet on Better Future was a non-profit organization created by ABDULKADIR SALAH in or about June 2021. Bet on Better Future opened several Federal Child Nutrition Program sites throughout Minnesota, including sites in Rochester, Minneapolis, Burnsville, and Faribault.

Count 1

(Conspiracy to Commit Wire Fraud)

21. From in or about April 2020 through in or about 2022, the defendants,

AIMEE MARIE BOCK,
ABDIKERM ABDELAHI EIDLEH,
SALIM AHMED SAID,
ABDULKADIR NUR SALAH,
AHMED SHARIF OMAR-HASHIM,
also known as “Salah Donyale,”
ABDI NUR SALAH,
ABDIHAKIM ALI AHMED,
AHMED MOHAMED ARTAN,
ABDIKADIR AINANSHE MOHAMUD,
also known as “AK,”
ABDINASIR MAHAMED ABSHIR,
ASAD MOHAMED ABSHIR,
HAMDY HUSSEIN OMAR, and
AHMED ABDULLAHI GHEDI,

conspired with each other, and others known and unknown to the grand jury, to devise a scheme and artifice to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, transmitted and caused to be transmitted writings, signs,

signals, pictures, and sounds by means of wire, radio or television communication in interstate or foreign commerce, in violation of Title 18, United States Code, Sections 371 and 1343.

Object and Purpose of the Conspiracy

22. The object and purpose of the conspiracy was to carry out a fraudulent scheme to obtain tens of millions of dollars in Federal Child Nutrition Program funds by submitting fraudulent claims that they were serving meals to thousands of children a day.

Manner and Means of the Conspiracy

23. The conspirators used the following manner and means, among others, to accomplish the objects and purpose of the conspiracy.

Feeding Our Future

24. As Executive Director of Feeding Our Future, AIMEE BOCK oversaw a massive scheme to defraud carried out by sites under its sponsorship. BOCK and her company recruited individuals and entities to open up more than 200 Federal Child Nutrition Program sites throughout the state of Minnesota. The sites fraudulently claimed to be serving meals to thousands of children a day within just days or weeks of being formed and despite having few, if any, staff and little to no experience serving this volume of meals.

25. Feeding Our Future also opened its own Federal Child Nutrition Program sites, including several sites in Minneapolis and a site in Burnsville. Feeding Our Future contracted with vendors who would, in theory, provide meals to be served to children by Feeding Our Future staff. In reality, the Feeding Our Future

sites were fraudulent and their claims to be serving meals to thousands of children a day, seven days a week, were false.

26. In support of these fraudulent claims, the conspirators created and submitted fake documentation to cover up their fraud. Sites submitted fraudulent meal count sheets purporting to document the number of children and meals served at each site. They also submitted fake invoices purporting to document their purchase of food to be served at the sites. Although some sites did purchase and serve some small amount of food, they obtained fraudulent invoices for inflated quantities of food purchased or meals served to make it appear as though they were serving meals to thousands of children each day. The conspirators also created fake invoices from legitimate food distribution companies in order to cover up their scheme to defraud.

27. The sites submitted fake attendance rosters. The rosters purported to list the name and age of each child that received a meal each day. But the rosters were fake and did not actually track the service of meals to children. Instead, the conspirators created the lists using fake names. Because the program only reimbursed for meals served to children, the conspirators sometimes used an Excel formula to insert a random age between 7 and 17 into the rosters.

28. Despite knowing the claims were fraudulent, BOCK and Feeding Our Future submitted her co-conspirators' fraudulent claims to MDE and then disbursed the fraudulently obtained Federal Child Nutrition Program funds to the individuals and entities involved in the scheme.

29. Beginning in approximately April 2020, Feeding Our Future dramatically increased both the number of sites under its sponsorship as well as the

amount of Federal Child Nutrition Program funds received by those sites. The company went from receiving and disbursing approximately \$3.4 million in federal funds to sites under its sponsorship in 2019 to nearly \$200 million in 2021. In all, Feeding Our Future fraudulently obtained and disbursed more than \$240 million in Federal Child Nutrition Program funds during the Covid-19 pandemic.

30. In exchange for sponsoring these sites' fraudulent participation in the program, Feeding Our Future received nearly \$18 million in Federal Child Nutrition Program funds as administrative fees in 2021. Because its administrative fees were tied to the amount of federal funds received by sites under its sponsorship, Feeding Our Future received tens of millions of dollars in administrative fees to which it was not entitled due to its sponsorship and facilitation of sites' fraudulent participation in the program.

31. In addition to the administrative fees, BOCK, ABDIKERM EIDLEH, and other Feeding Our Future employees also solicited and received bribes and kickbacks from individuals and companies sponsored by Feeding Our Future. In effect, Feeding Our Future operated a pay-to-play scheme, where individuals seeking to operate fraudulent sites under the sponsorship of Feeding Our Future had to kickback a portion of their fraudulent proceeds to Feeding Our Future employees. Many of these kickbacks were paid in cash or disguised as "consulting fees" paid to shell companies created by Feeding Our Future employees to conceal the true nature of the payments and to make them appear legitimate.

32. As part of the scheme, EIDLEH also created his own Federal Child Nutrition Program sites in the name of nominee owners. EIDLEH, through his

nominee owners, fraudulently claimed that the sites were serving meals to thousands of children per day. EIDLEH created shell companies purporting to be meal vendors providing food and meals to be served at these sites. EIDLEH also created and submitted fraudulent invoices purporting to document the sale of meals to the sites. In reality, these invoices were fake and designed to obtain, misappropriate, and launder Federal Child Nutrition Program funds.

33. In order to cover up and continue the fraud, BOCK and Feeding Our Future sought to divert attention away from their fraudulent scheme by blaming MDE when it attempted to perform legitimate and necessary oversight. MDE regularly raised questions about the number of sites and amount of claims being submitted by Feeding Our Future on behalf of sites under its sponsorship. BOCK and Feeding Our Future knew that MDE's concerns were valid, and that little of the Federal Child Nutrition Program funds disbursed by Feeding Our Future were used to feed children. BOCK further knew that if MDE discovered the true nature of the fraud, the flow of federal funds to Feeding Our Future and sites under its sponsorship would stop.

34. To allay MDE's concerns and suspicions, BOCK and Feeding Our Future gave false assurances that they were monitoring the sites under its sponsorship and that the sites were serving the meals as claimed. When MDE employees pressed BOCK for further clarification and answers, BOCK accused MDE of discrimination and unfairly scrutinizing Feeding Our Future's sites. When MDE denied Feeding Our Future site applications, BOCK and Feeding Our Future filed a lawsuit accusing

MDE of denying the site applications due to racial animus in violation of the Minnesota Human Rights Act.

Safari Restaurant

35. As part of the conspiracy, in April 2020, during the early days of the Covid-19 pandemic, the Safari Restaurant opened a Federal Child Nutrition Program site under the sponsorship of Feeding Our Future. By July 2020, Safari Restaurant claimed to be serving meals to 5,000 children a day, seven days a week. In all, the defendants claimed to have served more than 3.9 million meals to children at the Safari Restaurant site between April 2020 and November 2021.

36. In support of their fraudulent claims, the conspirators submitted fake attendance rosters purporting to list the names and ages of children who attended and received meals at the Safari Restaurant site's "after-school program." For example, in October 2021, SALIM SAID submitted a roster listing the names and ages of approximately 2,036 children who received the Safari Restaurant site. The roster was fraudulent. Of the more than 2,000 names on the list, only approximately 100 matched those of children attending school in the Minneapolis Public School District.

37. Safari Restaurant also operated as a vendor purporting to deliver food and meals to Federal Child Nutrition Program sites created by co-conspirators throughout the state of Minnesota. In all, the defendants claimed that Safari Restaurant provided more than 2.2 million meals to other Federal Child Nutrition Program sites involved in the scheme. In all, as part of the scheme to defraud, Safari Restaurant received more than \$16 million in Federal Child Nutrition Program funds

in 2020 and 2021. SALIM SAID and ABDULKADIR SALAH sent much of this money to their co-conspirators via shell companies created and used to receive and launder the proceeds of the fraudulent scheme.

38. Feeding Our Future received more than \$1.4 million in administrative fees for sponsoring Safari Restaurant's fraudulent participation in the program during this period. In addition, Safari Restaurant paid more than \$350,000 in bribes and kickbacks to BOCK and EIDLEH in exchange for Feeding Our Future's sponsorship of Safari Restaurant's fraudulent participation in the Federal Child Nutrition Program.

The ASA Limited and Olive Management Sites

39. In September and October 2020, SALIM SAID, ABDULKADIR SALAH, and other co-conspirators associated with Safari Restaurant applied to open new Federal Child Nutrition Program sites. They applied to open these sites under the names of newly created shell companies—ASA Limited and Olive Management.

40. As part of the scheme, ABDIHAKIM AHMED, SALIM SAID, and AHMED GHEDI opened up a Federal Child Nutrition Program site in St. Paul (the "ASA Limited site") in September 2020. The ASA Limited site claimed to have served meals to 2,000 or 3,000 children each day, seven days a week at the Gurey Deli, a small market located in a strip mall in St. Paul. During the one-year period from September 2020 to September 2021, the conspirators claimed to have served more than 1.6 million meals at the ASA Limited site. In support of these claims, ABDIHAKIM AHMED and his co-conspirators prepared and submitted fraudulent meal counts and invoices.

41. The conspirators also submitted a fake attendance roster that purported to identify both the names and ages of approximately 2,000 children that attended the ASA Limited site's "after-school program" in September 2021. The list was fake. Indeed, the spreadsheet contained a formula that inserted a random number between 7 and 17 in the age column for each "child" on the list.

42. Based on these false claims, ABDIHAKIM AHMED and his co-conspirators received approximately \$5 million in Federal Child Nutrition Program reimbursements for meals purported served at the ASA Limited site. ABDIHAKIM AHMED sent much of this money to his co-conspirators via shell companies created and used to receive and launder the proceeds of the fraudulent scheme. For its part, Feeding Our Future received more than \$400,000 in administrative fees for sponsoring the ASA Limited site's fraudulent participation in the program.

43. ABDIHAKIM AHMED also paid approximately \$49,000 in kickbacks from ASA Limited LLC to ABDIKERM EIDLEH, the Feeding Our Future employee who served as the site support manager for the ASA Limited site. These payments were made to entities controlled by EIDLEH, in order to disguise the nature of the kickback payments and to make them appear legitimate.

44. As part of the scheme, AHMED OMAR-HASHIM opened up the Olive Management site in September 2020. The Olive Management site fraudulently claimed to have served meals to 3,000 children a day, seven days a week, at the Hormud Meat and Deli, a small storefront deli located in a strip mall in St. Cloud. During the 12-month period from September 2020 to September 2021, OMAR-HASHIM and his co-conspirators fraudulently claimed to have served more than 1.6

million meals to children at the Olive Management site. In support of these claims, OMAR-HASHIM prepared and submitted fraudulent meal count sheets and invoices.

45. In support of their fraudulent claims, the conspirators also submitted a fake attendance roster purporting to list the names of 2,040 children who attended the Olive Management site's "after-school program." The roster was fraudulent. Of the approximately 2,040 names on the list, only approximately 20 matched the names of children attending school in the St. Cloud Public School District.

46. Based on these fraudulent claims, from in or about September 2020 to September 2021, OMAR-HASHIM and his co-conspirators received approximately \$5 million in Federal Child Nutrition Programs reimbursements for meals purportedly served to children at the Olive Management site.

47. OMAR-HASHIM sent much of this money to his co-conspirators via shell companies created and used to receive and launder the proceeds of the fraud scheme. OMAR-HASHIM also paid approximately \$45,000 in kickbacks from Olive Management to EIDLEH, the Feeding Our Future employee who served as the site support manager for the Olive Management site. Feeding Our Future also received approximately \$400,000 in administrative fees for sponsoring Olive Management's fraudulent participation in the program.

The Stigma-Free Sites

48. In October 2020, MDE announced that USDA was no longer allowing restaurants and other for-profit companies to enroll as Federal Child Nutrition Program sites. MDE explained that restaurants would only be allowed to participate as meal vendors providing food and not as distribution sites. MDE further announced

that any restaurants enrolled as distribution sites would be closed as of October 31, 2020. In response to this new policy, and in an effort to facilitate the sites' fraudulent participation in the scheme, on or about October 20, 2020, BOCK emailed a letter to MDE titled "Clarification – Restaurants." In the letter, BOCK falsely claimed that many of the sites opened at restaurants were actually being staffed and operated by Feeding Our Future employees, including the Safari Restaurant, Olive Management, and ASA Limited sites. With respect to each of these sites, BOCK claimed—falsely—that the "site is being staff[ed] by Feeding Our Future. . . . Only Feeding Our Future's trained staff and volunteers and sponsor trained site staff serving as volunteers are permitted to distribute the meals."

49. Shortly after MDE announced that it was no longer approving sites run by restaurants and other for-profit companies, the owners of Safari Restaurant and other associates, including ABDULKADIR SALAH, SALIM SAID, AHMED OMAR-HASHIM, ABDI SALAH, and AHMED ARTAN, obtained a new non-profit entity, Stigma-Free International, for use in carrying out the scheme. They immediately used their new non-profit to open a number of new Federal Child Nutrition Program sites. At the same time, other conspirators, including ABDIKADIR MOHAMUD, ABDINASIR ABSHIR, ASAD ABSHIR, and HAMDI OMAR, created additional shell companies to serve as meal vendor companies purporting to provide the meals to be served to children at these Stigma-Free International sites. Together, the defendants claimed to be serving meals to tens of thousands of children each day throughout the state of Minnesota, for which they fraudulently claimed and received millions of dollars in Federal Child Nutrition Program funds.

The Stigma-Free Willmar Site

50. As part of the conspiracy, AHMED ARTAN and ABDIKADIR MOHAMUD opened the Stigma-Free Willmar site in October 2020. The Stigma-Free Willmar site purported to serve meals to 2,000 or 3,000 children a day, seven days a week, from FaaFan restaurant, a small storefront restaurant in downtown Willmar. Prior to 2020, FaaFan Restaurant served a few dozen people a day. FaaFan Restaurant had only \$500 or \$600 in daily sales and less than \$200,000 in annual revenue. The owner of FaaFan Restaurant leased the storefront restaurant space for approximately \$1,600 per month. In or about October 2020, ABDIKADIR MOMAHUD approached the owner of FaaFan Restaurant and offered to pay him \$40,000 per month to use his small storefront restaurant for the Stigma-Free Willmar site. From January to November 2021, ABDIKADIR MOHAMUD paid more than \$570,000 to the owner of FaaFan Restaurant. ABDIKADIR MOHAMUD also created a shell company called Tunyar Trading that purported to be a meal vendor providing meals to be served at the Stigma-Free Willmar site.

51. During the one-year period from November 2020 to November 2021, ABDIKADIR MOHAMUD and his co-conspirators claimed to have served approximately 1.6 million meals at the Stigma-Free Willmar site. In support of these claims, ABDIKADIR MOHAMUD prepared and submitted fraudulent meal count sheets and invoices.

52. The conspirators submitted a fake attendance roster purporting to list the names and ages of approximately 2,000 children who attended the Stigma-Free Willmar site's "after-school program." The list was fake and submitted to support

their fraudulent claims. The 2,000 names on the roster would have represented nearly half of the total number of students who attended school in the Willmar public school district. But, in reality, only approximately 33 of the names on the roster matched the names of actual students attending school in the Willmar Public School District.

53. Based on these claims, ABDIKADIR MOHAMUD and his co-conspirators received more than \$4 million in Federal Child Nutrition Program funds. Rather than use this money to serve meals or feed children, the conspirators fraudulently misappropriated and stole much of it. ABDIKADIR MOHAMED transferred more than \$2 million from Tunyar Trading to himself and other co-conspirators, including SALIM SAID, ABDULKADIR SALAH, ADBI SALAH, and AHMED GHEDI. The bulk of this money was not transferred directly to the defendants, but instead routed to entities set up and used to disguise the source and use of the proceeds of the fraud scheme.

54. Feeding Our Future received nearly \$500,000 in administrative fees for sponsoring the Stigma-Free Willmar site's fraudulent participation in the program. ABDIKADIR MOHAMED also paid more than \$225,000 in bribes and kickbacks from Tunyar Trading LLC to ABDIKERM EIDLEH, the Feeding Our Future employee who served as the site support manager for the Stigma-Free Willmar site, in exchange for the sponsoring and facilitating Stigma-Free Willmar's fraudulent participation in the Federal Child Nutrition Program.

The Stigma-Free Mankato Site

55. ABDINASIR MAHAMED ABSHIR and ASAD MOHAMED ABSHIR opened the Stigma-Free Mankato site in October 2020. The Stigma-Free Mankato site purported to serve meals to 3,000 children a day, seven days a week. ABDINASIR MAHAMED ABSHIR and ASAD MOHAMED ABSHIR also created a shell company called Horseed Management that purported to serve as a meal vendor providing meals to be served at the site.

56. ABDINASIR ABSHIR and ASAD ABSHIR claimed to be operating the Stigma-Free Mankato site out of J's Sambusa, a small restaurant in North Mankato. ABDINASIR ABSHIR and Horseed Management LLC paid more than \$440,000 to the owner of J's Sambusa from December 2020 to December 2021 in exchange for using the restaurant for the Stigma-Free Mankato site.

57. During the one-year period from November 2020 to November 2021, ABDINASIR ABSHIR, ASAD ABSHIR, and their co-conspirators claimed to have served more than 1.6 million meals at the Stigma-Free Mankato site. In support of these claims, ABDINASIR ABSHIR and his co-conspirators prepared and submitted fraudulent meal count sheets, attendance rosters, and invoices.

58. As with the Stigma-Free Willmar site, the conspirators submitted a fake roster in support of its fraudulent claims for the Stigma-Free Mankato site. The roster purported to list the names and ages of approximately 2,032 children who attended and received meals at their "after school program" in Mankato. Again, the list was fake. Only 16 of the names on the roster matched the names of students who attended school in the Mankato Area Public School district.

59. Based on these claims, the co-conspirators received approximately \$5 million in Federal Child Nutrition Program funds. ABDINASIR ABSHIR, in turn, transferred millions of dollars from Horseed Management to himself and other co-conspirators, including defendants SALIM SAID, ASAD ABSHIR, and AHMED GHEDI, through entities set up and used to disguise the source and use of the proceeds of the fraud scheme.

60. Feeding Our Future also received nearly \$420,000 in administrative fees for sponsoring the Stigma-Free Mankato site's fraudulent participation in the program. ABDINASIR ABSHIR also paid more than \$100,000 in kickbacks from Horseed Management LLC to EIDLEH in exchange for sponsoring and facilitating Stigma-Free Mankato's fraudulent participation in the Federal Child Nutrition Program.

The Stigma-Free Waite Park Site

61. As part of the conspiracy, AHMED ARTAN and HAMDI OMAR opened the Stigma-Free Waite Park site in or about April 2021. The Stigma-Free Waite Park site claimed to have served 2,000 children a day, seven days a week, at the Green Market, a small market and grocery located in a strip mall in Waite Park. HAMDI OMAR created a company called Feeding Our Youth that purported to serve as a meal vendor for the site.

62. During the eight-month period from April to November 2021, HAMDI OMAR and her co-conspirators claimed to have served more than 500,000 meals at the Stigma-Free Waite Park site. In support of these claims, HAMDI OMAR and her co-conspirators prepared and submitted fraudulent meal counts and invoices.

63. The conspirators also prepared and submitted a fake attendance roster purporting to contain the names and ages of approximately 2,000 children who attended the Stigma-Free Waite Park site's "after school program." But there was no after-school program, and this roster was fake. Indeed, the age column on the roster spreadsheet contained an imbedded formula that inserted a random number between 7 and 17 in the age column of the spreadsheet. For this reason, each time HAMDI OMAR and her co-conspirators prepared and submitted the attendance roster for the Stigma-Free Waite Park site, the roster contained the same names but different, randomly generated ages for the "children" on the list.

64. Based on these claims, HAMDI OMAR and her co-conspirators received more than \$1 million in Federal Child Nutrition Program reimbursements. Feeding Our Future received more than \$100,000 in administrative fees for sponsoring the Stigma-Free Waite Park site's fraudulent participation in the program.

Bet on Better Future

65. As part of the scheme in late 2021, ABDULKADIR SALAH registered another non-profit entity, Bet on Better Future, for use in carrying out the scheme. ABDULKADIR SALAH and his co-conspirators opened several Federal Child Nutrition Program sites through Bet on Better Future, including sites in Rochester, Minneapolis, Burnsville, Faribault, and St. Paul.

66. ABDULKADIR SALAH and his co-conspirators claimed to be serving meals to thousands of children per day at the Bet on Better Future sites. In all, ABDULKADIR SALAH received more than \$1 million in Federal Child Nutrition

Program funds into Bet on Better Future bank accounts in December 2021 and January 2022.

Acts in Furtherance of the Conspiracy

67. In furtherance of the conspiracy and to affect its unlawful objections, the defendants committed and caused to be committed the following overt acts, among others, in the state and District of Minnesota, and elsewhere:

AIMEE BOCK and Safari Restaurant

68. In or about April 2020, during the early days of the Covid-19 pandemic, defendants AIMEE BOCK and SALIM SAID submitted an application to open a Federal Child Nutrition Program site at Safari Restaurant under the sponsorship of Feeding Our Future.

69. On or about April 10, 2020, BOCK and SAID signed a contract providing that Feeding Our Future would disburse Federal Child Nutrition Program funds to Safari Restaurant for serving meals at the Safari Restaurant site.

70. In July 2020, Safari Restaurant claimed to be serving meals to 5,000 children a day, seven days a week. Safari Restaurant claimed to be entitled to millions of dollars in Federal Child Nutrition Program reimbursements for serving these meals.

71. On or about March 1, 2021, SAID sent an email to EIDLEH with the subject line "February summer meal counts Claims for Safari restaurant." Attached to the email were meal count forms claiming that the Safari Restaurant site served breakfast and lunch to 6,000 children a day, seven days a week, during February 2021.

The ASA Limited Site

72. On or about September 4, 2020, ABDIHAKIM ALI AHMED registered ASA Limited LLC with the Minnesota Secretary of State.

73. Four days later, on or about September 8, 2020, BOCK and ABDIHAKIM AHMED submitted an application to open the ASA Limited site in St. Paul.

74. BOCK and SAID signed a vendor contract stating that Safari Restaurant would serve as a meal vendor providing food and meals for the ASA Limited site, for which Safari Restaurant would receive Federal Child Nutrition Program reimbursements from Feeding Our Future.

75. Beginning on September 25, 2020—just 3 weeks after the company was registered with the Minnesota Secretary of State, SAID, ABDIHAKIM AHMED, and AHMED GHEDI claimed that the ASA Limited site served both breakfast and lunch to approximately 2,500 children a day. By September 27, 2020, they claimed the site was serving breakfast and lunch to 3,000 children a day.

76. On or about September 2, 2021, ABDIHAKIM AHMED emailed to Feeding Our Future meal counts and invoices claiming that the ASA Limited site served breakfast and lunch to 2,000 children a day every day in August 2021.

77. On or about October 7, 2021, ABDIHAKIM AHMED responded to an email containing a list purporting to show attendance for the ASA Limited “After School Program for the Month of September 2021.” ABDIHAKIM AHMED asked, “can you make all the kids ages 6-17?”

78. Later that day, ABDIHAKIM AHMED submitted a spreadsheet containing another version of the fake attendance list with a formula that inserted a random number between 7 and 17 in the age column for each “child.”

79. On or about November 3, 2021, ABDIHAKIM AHMED sent BOCK an email containing meal counts, a fake attendance roster, and invoices claiming, fraudulently, that the ASA Limited site served supper and a snack to 2,000 children a day every day in October 2021.

80. On or about December 16, 2020, ABDIHAKIM AHMED sent \$250,000 from ASA Limited to Salim Limited LLC, a shell company created and used by SAID to receive and launder fraud proceeds.

81. On or about January 6, 2021, ABDIHAKIM AHMED wrote a \$203,700 check from ASA Limited to AG Limited LLC, a shell company created and used by AHMED GHEDI to receive and launder fraud proceeds.

82. On or about February 23, 2021, ABDIHAKIM AHMED wrote a \$130,000 check from ASA Limited to Salim Limited LLC, the shell company created and used by SAID to receive and launder fraud proceeds.

83. On or about March 31, 2021, ABDIHAKIM AHMED wrote a \$20,000 check from ASA Limited to 3017 LLC, the shell company created and used by ABDULKADIR SALAH to receive and launder fraud proceeds.

84. On or about May 12, 2021, ABDIHAKIM AHMED wrote a \$190,000 check from ASA Limited to AG Limited LLC, the shell company created and used by AHMED GHEDI to receive and launder fraud proceeds.

85. On or about May 25, 2021, ABDIHAKIM AHMED wrote a \$40,000 check from ASA Limited to 3017 LLC, the shell company created and used by ABDULKADIR SALAH to receive and launder fraud proceeds.

The Olive Management Site

86. On or about September 7, 2020, AHMED OMAR-HASHIM incorporated Olive Management, Inc.

87. Two days later, on or about September 9, 2020, OMAR-HASHIM submitted an application for Olive Management Inc. to participate in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future.

88. By September 28, 2020—less than 3 weeks after the company was formed—Olive Management Inc. claimed to be serving both breakfast and lunch to nearly 3,000 children a day at a small storefront deli located in a strip mall in St. Cloud, Minnesota.

89. On or about December 29, 2020, BOCK wrote a check for \$1,135,171 in Federal Child Nutrition Program funds from Feeding Our Future to Olive Management.

90. On or about October 4, 2021, ABDULKADIR SALAH sent OMAR-HASHIM an email containing fake meal counts, invoices, and receipts purporting to show that the Olive Management site served meals to 2,000 children a day the first week of September 2021.

91. On or about October 5, 2021, ABDULKADIR SALAH sent Feeding Our Future a fake roster purporting to list the names of approximately 2,040 children who attended the Olive Management-St. Cloud “after-school program” in September 2021.

92. On or about November 10, 2021, AHMED ARTAN sent an email to OMAR-HASHIM containing meal counts claiming that the Olive Management site served meals to 3,000 children beginning on September 28, 2020, and through December 31, 2020.

93. On or about January 18, 2021, OMAR-HASHIM wrote a \$313,000 check from Olive Management to Salim Limited LLC, a shell company created and used by SALIM SAID to receive and launder fraud proceeds.

94. On or about January 18, 2021, OMAR-HASHIM wrote a \$125,000 check from Olive Management to 3017 LLC, a shell company created and used by ABDULKADIR NUR SALAH to receive and launder fraud proceeds.

95. On or about February 19, 2021, OMAR-HASHIM wrote a \$80,000 check from Olive Management to 3017 LLC, a shell company created and used by ABDULKADIR SALAH to receive and launder fraud proceeds.

96. On or about February 22, 2021, OMAR-HASHIM wrote a \$229,000 check to Salim Limited LLC, a shell company created and used by SALIM AHMED SAID to receive and launder fraud proceeds.

97. On or about May 24, 2021, OMAR-HASHIM wrote a \$150,000 check from Olive Management to Salim Limited LLC, a shell company created and used by SAID to receive and launder fraud proceeds.

98. On or about September 15, 2021, OMAR-HASHIM wrote a \$20,000 check from Olive Management to AG Limited LLC, a shell company created and used by AHMED GHEDI to receive and launder fraud proceeds.

Stigma-Free International

99. Defendants ABDI SALAH and AHMED ARTAN acquired Stigma-Free International Inc., a non-profit organization that had been created by Individual A in or about August 2019.

100. On or about October 7, Individual A sent Stigma-Free International incorporation documents and board minutes for Stigma-Free International to ABDI SALAH. ABDI SALAH forwarded the documents to AHMED ARTAN.

101. On or about October 7, 2020, ABDI SALAH sent Individual A board minutes announcing the resignation of Individual A as president of Stigma-Free International and the appointment of AHMED ARTAN as the new president of Stigma-Free International.

102. On or about October 8, 2020, AHMED ARTAN replaced Individual A as the signatory on the Stigma-Free International bank account.

103. On or about October 9, 2020, AHMED ARTAN and BOCK prepared and signed on behalf of Stigma-Free International applications to open Federal Child Nutrition Program sites in Willmar and Mankato, Minnesota, under the sponsorship of Feeding Our Future.

The Stigma-Free Willmar Site

104. BOCK and AHMED ARTAN submitted an application to open the Stigma-Free Willmar site on or about October 19, 2020.

105. A few weeks earlier, on or about September 28, 2020, ABDIKADIR MOHAMUD created a company called Tunyar Trading LLC.

106. On or about October 10, 2020, ABDIKADIR MOHAMUD and BOCK entered into a vendor contract between Tunyar Trading LLC and Feeding Our Future providing that Tunyar Trading LLC would be reimbursed for providing meals to be served to children at the Stigma-Free Willmar site.

107. By October 20, 2020, less than a month after creating the Stigma-Free Willmar site, ABDIKADIR MOHAMUD and AHMED ARTAN claimed to be serving meals to 3,000 children a day, seven days a week, at the storefront restaurant.

108. On or about December 30, 2020, ABDIKADIR MOHAMUD sent Feeding Our Future meal counts claiming that the Stigma-Free Willmar site was serving nearly 3,000 meals a day in October 2020.

109. On or about February 28, 2021, AHMED ARTAN sent an email to EIDLEH and Feeding Our Future containing meal counts claiming that the Stigma-Free Willmar site had served nearly 3,000 meals a day in February 2021.

110. On or about November 3, 2021, ARTAN sent an email to Feeding Our Future that included meal counts claiming that the Stigma-Free Willmar site had served supper and a snack to 2,000 children a day in October 2021, as well as a fake attendance roster purporting to list the names and ages of approximately 2,000 children that attended the Stigma-Free Willmar site's "after-school program."

111. On or about February 19, 2021, ABDIKADIR MOHAMED wrote a \$150,000 check from Tunyar Trading to Stone Bridge Development LLC, a shell company created by ABDI SALAH to receive and launder fraud proceeds.

112. On or about May 27, 2021, ABDIKADIR MOHAMED wrote a \$70,000 check from Tunyar Trading to 3017 LLC, a shell company created by ABDULKADIR SALAH to receive and launder fraud proceeds.

113. On or about June 4, 2021, ABDIKADIR MOHAMED wrote a \$270,000 check from Tunyar Trading to Stone Bridge Development LLC, a shell company created by ABDI SALAH to receive and launder fraud proceeds.

114. On or about May 27, 2021, ABDIKADIR MOHAMED wrote a \$150,000 check from Tunyar Trading to Salim Limited LLC, a shell company created by SALIM SAID to receive and launder fraud proceeds.

115. On or about May 27, 2021, ABDIKADIR MOHAMED wrote a \$80,000 check from Tunyar Trading to AG Limited LLC, a shell company created by AHMED GHEDI to receive and launder fraud proceeds.

The Stigma-Free Mankato Site

116. BOCK and AHMED ARTAN completed and signed an application to open the Stigma-Free Mankato site on or about October 9, 2020.

117. On or about October 9, 2020—the same day that BOCK and ARTAN signed the Stigma-Free Mankato application—ABDINASIR ABSHIR and ASAD ABSHIR created a company called Horseed Management LLC to carry out the fraudulent scheme.

118. In or about October 2020, ABDINASIR ABSHIR and BOCK entered into a vendor contract between Horseed Management and Feeding Our Future providing that Horseed Management would be reimbursed for providing meals to children at the Stigma-Free Mankato site.

119. On or about December 30, 2020, ABDIKADIR MOHAMUD submitted meal counts indicating that Stigma-Free Mankato was serving both breakfast and lunch to 3,000 children a day, seven days a week, beginning on October 19, 2020—the same day that BOCK and ABDINASIR ABSHIR applied to open the site and two months before they rented out the restaurant.

120. On or about April 1, 2021, AHMED ARTAN sent an email to EIDLEH and Feeding Our Future containing meal counts claiming that the Stigma-Free Mankato site served breakfast and lunch to 3,000 children a day, seven days a week, during March 2021.

121. On or about November 2, 2021, AHMED ARTAN sent Feeding Our Future meal counts claiming that Horseed Management had served meals to 2,000 children a day, seven days a week in October 2021 as well as a fake attendance roster purporting to list the names and ages of approximately 2,032 children who attended Horseed Management Mankato's "after-school program" in October 2021.

122. On or about January 28, 2021, ABDINASIR ABSHIR wrote a \$155,000 check from Horseed Management to Salim Limited LLC, the shell company created by SALIM SAID to receive and launder fraud proceeds.

123. On or about February 8, 2021, ABDINASIR ABSHIR wrote a \$70,000 check from Horseed Management to AG Limited LLC, the shell company created by AHMED GHEDI to receive and launder fraud proceeds.

124. On or about February 22, 2021, ABDINASIR ABSHIR wrote a \$75,391 check from Horseed Management to Santana LLC, the shell company created by ASAD ABSHIR to receive and launder fraud proceeds.

125. On or about February 24, 2021, ABDINASIR ABSHIR wrote a \$125,000 check from Horseed Management to Salim Limited LLC.

126. On or about March 17, 2021, ABDINASIR ABSHIR wrote a \$118,958 check from Horseed Management to Santana LLC.

127. On or about May 26, 2021, ABDINASIR ABSHIR transferred \$298,958 from Horseed Management to Calikamin Enterprise, a shell company he created to receive and launder fraud proceeds.

128. On or about May 27, 2021, ABDINASIR ABSHIR transferred \$294,187 from Horseed Management to Calikamin Enterprise.

The Stigma-Free Waite Park Site

129. On or about December 30, 2020, BOCK and AHMED ARTAN signed and submitted an application to open the Stigma-Free Waite Park site.

130. On or about April 9, 2021, HAMDI OMAR created a company called Feeding Our Youth LLC, ostensibly to run the Stigma-Free Waite Park site.

131. On or about June 18, 2021, AHMED ARTAN and HAMDI OMAR prepared and submitted to Feeding Our Future meal counts purporting to show that the Stigma-Free Waite Park site served both an afternoon snack and supper to 1,700 to 2,000 children a day, seven days a week beginning on April 4, 2021—five days before HAMDI OMAR registered Feeding Our Youth LLC with the Minnesota Secretary of State.

132. On or about November 2, 2021, HAMDI OMAR sent meal counts claiming that the Stigma-Free Waite Park site had served meals to more than 2,000 children a day, seven days a week in October 2021. In support of that claim, HAMDI

OMAR also sent a fake attendance roster containing the names and ages of approximately 2,000 children who attended Feeding Our Youth's "after-school program" in October 2021.

133. On or about August 10, 2021, HAMDI OMAR wrote a \$116,000 check from Feeding Our Youth to Salim Limited LLC, the shell company created and used by SALIM SAID to receive and launder fraud proceeds.

134. On or about August 30, 2021, HAMDI OMAR wrote a \$90,000 check from Feeding Our Youth to Salim Limited LLC.

135. On or about August 31, 2021, HAMDI OMAR wrote a \$38,000 check from Feeding Our Youth to Omar Management Corporation, a shell company that OMAR created and used to receive and launder fraud proceeds.

136. On or about January 6, 2022, HAMDI OMAR wrote a \$250,000 check from Feeding Our Youth to a newly created company that used the money to purchase commercial bakery equipment for use in starting a new bakery company.

Bet on Better Future

137. On or about June 21, 2021, ABDULKADIR SALAH created another non-profit company called Bet on Better Future.

138. On or about November 24, 2021, ABDULKADIR SALAH submitted on behalf of Bet on Better Future applications to open Federal Child Nutrition Program sites at a number of locations, including Minneapolis, St. Paul, Burnsville, Rochester, and St. Cloud.

139. On or about December 2, 2021, ABDULKADIR SALAH submitted to Feeding Our Future claims that Stigma-Free International and Bet on Better Future

sites had served more than 250,000 meals to children at 12 sites located around the state of Minnesota during the month of November 2021.

The Southcross Site

140. On or about October 13, 2020, BOCK and Feeding Our Future opened a Federal Child Nutrition Program site in Burnsville, Minnesota (the “Southcross site”).

141. On or about August 13, 2021, BOCK sold the Southcross site to ABDULKADIR SALAH, SALIM SAID, and Cosmopolitan Business Solutions for \$310,000. In order to make this transaction appear legitimate, BOCK created a contract stating that the transaction involved the sale of a childcare center.

142. On or about December 2, 2021, ABDULKADIR SALAH submitted to Feeding Our Future meal count sheets claiming that the Southcross site provided food to 1,718 children per day in November 2021. ABDULKADIR SALAH also attached a fake roster purporting to identify the children who received meals at the Southcross site.

All in violation of Title 18, United States Code, Section 371.

Counts 2-14
(Wire Fraud)

143. Paragraphs 1 through 141 are incorporated herein.

144. From at least in or about April 2020 through in or about January 2022, in the State and District of Minnesota, and elsewhere, the defendants as set forth below, and others known and unknown to the grand jury, did knowingly devise and participate in a scheme and artifice to defraud and to obtain money by means of

materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts.

145. On or about the dates listed below, in the State and District of Minnesota and elsewhere, the defendants, as set forth below, for the purpose of executing the scheme described above, knowingly caused to be transmitted by means of a wire communication in interstate commerce, certain writings, signs, signals, and sounds, including the following:

Count	Defendants	Date (on or about)	Wire Details
2	AIMEE BOCK SALIM SAID ABDIKAHKIM AHMED AHMED GHEDI	September 8, 2020	An email from BOCK to MDE containing an application to open the ASA Limited site that traveled through servers located outside the state of Minnesota
3	ABDI SALAH AHMED ARTAN	October 8, 2020	An email from ABDI SALAH to AHMED ARTAN containing resignation letter and board minutes announcing the appointment of AHMED ARTAN as president of Stigma-Free International that traveled through servers located outside the state of Minnesota
4	AIMEE BOCK ABDI SALAH AHMED ARTAN ABDIKADIR MOHAMUD	October 19, 2020	An email from BOCK to MDE containing an application to open the Stigma-Free Willmar site that traveled through servers located outside the state of Minnesota
5	AIMEE BOCK SALIM SAID ABDULKADIR SALAH AHMED OMAR-HASHIM ABDIHAKIM AHMED AHMED GHEDI	October 20, 2020	An email from BOCK to MDE with the subject line "For-Profit Restaurant Clarifications" that traveled through servers located outside the state of Minnesota
6	ABDIKERM EIDLEH ABDI SALAH AHMED ARTAN	December 30, 2020	An email from ABDIKADIR MOHAMUD to ABDIKERM EIDLEH with the subject line

	ABDIKADIR MOHAMUD		"Stigma-Free (Willmar) October/November" that traveled through servers located outside the state of Minnesota
7	ABDIKERM EIDLEH AHMED ARTAN ABDINASIR ABSHIR ASAD ABSHIR	December 30, 2020	An email from ABIDKADIR MOHAMUD to ABDIKERM EIDLEH with the subject line "Stigma-Free (Mankato) October/November" that passed through servers located outside the state of Minnesota
8	ABDIKERM EIDLEH SALIM SAID ABDULKADIR SALAH	March 1, 2021	An email from SALIM SAID to ABDIKERM EIDLEH with the subject line "February summer meal counts Claims for Safari Restaurant" that traveled through servers located outside the state of Minnesota
9	AHMED ARTAN HAMDI OMAR	June 18, 2021	An email from AHMED ARTAN to Feeding Our Future containing meal count sheets for Stigma-Free Waite Park that traveled through servers located outside the state of Minnesota
10	AHMED ARTAN HAMDI OMAR	November 2, 2022	An email from HAMDI OMAR to AHMED ARTAN containing a Feeding Our Youth meal counts and attendance roster that traveled through servers located outside the state of Minnesota
11	AHMED OMAR-HASHIM	November 3, 2021	An email from AHMED OMAR-HASHIM to Feeding Our Future containing meal counts and a fake roster for the Olive Management site that traveled through servers located outside the state of Minnesota
12	AIMEE BOCK SALIM SAID ABDIHAKIM AHMED AHMED GHEDI	November 4, 2021	An email from ABDIHAKIM AHMED to BOCK containing fraudulent meal counts and a fake roster for the ASA Limited site that traveled through servers located outside the state of Minnesota
13	ABDULKADIR SALAH AHMED ARTAN	December 2, 2021	An email from ABDULKADIR SALAH containing meal counts

	ABDINASIR ABSHIR ASAD ABSHIR		and a fake roster for the Stigma-Free Mankato site that traveled through servers located outside the state of Minnesota
14	ABDULKADIR SALAH	December 2, 2021	An email from ABDULKADIR SALAH to Feeding Our Future with the subject line "all the companies" that traveled through servers located outside the state of Minnesota

All in violation of Title 18, United States Code, Section 1343.

Count 15

(Conspiracy to Commit Federal Programs Bribery)

146. Paragraphs 1 through 141 are incorporated herein.

147. From in or about April 2020 to in or about January 2022, in the state and District of Minnesota, the defendants,

**AIMEE MARIE BOCK,
ABDIKERM ABDELAHI EIDLEH,
SALIM AHMED SAID,
ABDULKADIR NUR SALAH,
AHMED SHARIF OMAR-HASHIM,
also known as "Salah Donyale,"
ABDIHAKIM ALI AHMED,
AHMED MOHAMED ARTAN,
ABDIKADIR AINANSHE MOHAMUD,
also known as "AK," and
ABDINASIR MOHAMED ABSHIR,**

conspired with each other and with others known and unknown to the Grand Jury to commit federal programs bribery, that is, to corruptly solicit, demand, accept, or agree to accept, and to give, offer, and agree to give, anything of value to any person, with intent to influence and reward an agent of an organization, to wit, agents of Feeding Our Future, in connection with any business, transaction and series of transactions with Feeding Our Future involving anything of value of \$5,000 or more,

that is, in exchange for sponsoring their fraudulent participation in the Federal Child Nutrition Program, where Feeding Our Future received benefits in excess of \$10,000 under federal programs involving grants, contracts, subsidies, loan guarantees, insurance and other forms of federal assistance in any one-year period, in violation of Title 18, United States Code, Sections 666(a)(1)(B) and (a)(2).

Purpose and Object of the Conspiracy

148. The object and purpose of the conspiracy was for individuals and entities participating in the fraudulent scheme to obtain Federal Child Nutrition Program funds to pay bribes and kickbacks to Feeding Our Future employees in exchange for Feeding Our Future's sponsorship of their participation in the Federal Child Nutrition Program.

Manner and Means of the Conspiracy

149. The conspirators used the following manner and means, among others, to accomplish the objects and purpose of the conspiracy:

- a. Employees of Feeding Our Future solicited and accepted bribes and kickbacks from individuals who opened Federal Child Nutrition Program sites under the sponsorship of Feeding Our Future.
- b. Employees of Feeding Our Future created shell companies for use in accepting and hiding the bribe and kickback payments.
- c. Individuals who ran sites under the sponsorship of Feeding Our Future paid bribes and kickbacks to Feeding Our Future employees. Many of these bribes and kickbacks were disguised as consulting payments or other legitimate payments to shell companies created by Feeding Our Future employees.

Overt Acts in Furtherance of the Conspiracy

150. The conspirators used the following manner and means, among others, to accomplish the objects and purpose of the conspiracy:

151. On or about July 28, 2020, SALIM SAID wrote a \$1,500 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.

152. On or about August 20, 2020, SALIM SAID wrote a \$2,500 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.

153. On or about September 15, 2020, SALIM SAID wrote a \$5,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.

154. On or about November 24, 2020, ABDIKERM EIDLEH registered Bridge Consulting & Logistics LLC with the Minnesota Secretary of State.

155. On or about November 25, 2020, SALIM SAID wrote a \$5,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.

156. On or about November 28, 2020, ABDULKADIR SALAH wrote a \$5,000 check from Cosmopolitan Business Solutions to Eidleh Inc.

157. On or about December 4, 2020, EIDLEH registered Bridge Logistics LLC with the Minnesota Secretary of State.

158. On or about December 14, 2020, EIDLEH registered Hope Suppliers LLC with the Minnesota Secretary of State.

159. On or about December 30, 2020, ABDIHAKIM AHMED wrote a \$14,000 check from ASA Limited LLC to Hope Suppliers LLC.

160. On or about January 8, 2021, ABDULKADIR SALAH wrote a \$7,000 check from Cosmopolitan Business Solutions to Eidleh Inc.

161. On or about January 13, 2021, AHMED GHEDI made a \$5,000 online payment from AG Limited LLC to ABDIKERM EIDLEH.

162. On or about January 18, 2021, ABDULKADIR SALAH wrote a \$7,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.

163. On or about January 18, 2021, AHMED OMAR-HASHIM wrote a \$24,000 check from Olive Management Inc. to Eidleh Inc.

164. On or about January 29, 2021, ABDIHAKIM AHMED wrote a \$7,000 check from ASA Limited LLC to Hope Suppliers LLC.

165. On or about February 8, 2021, ABDINASIR ABSHIR wrote a \$56,000 check from Horseed Management LLC to Eidleh Inc.

166. On or about February 8, 2021, ABDINASIR ABSHIR wrote a \$56,000 check from Horseed Management LLC to Bridge Logistics LLC.

167. On or about February 19, 2021, ABDIKADIR MOHAMUD wrote a \$68,333 check from Tunyar Trading LLC to Bridge Logistics LLC.

168. On or about February 19, 2021, ABDIKADIR MOHAMUD wrote a \$68,333 check from Tunyar Trading LLC to Hope Suppliers LLC.

169. On or about February 19, 2021, ABDIKADIR MOHAMUD wrote a \$68,333 check from Tunyar Trading LLC to Eidleh Inc.

170. On or about February 25, 2021, SALIM SAID wrote a \$14,000 check from Salim Limited LLC to Eidleh Inc.

171. On or about March 1, 2021, AHMED OMAR-HASHIM wrote a \$7,000 check from Olive Management Inc. to Eidleh Inc.

172. On or about March 9, 2021, SALIM SAID wrote a \$14,000 check from Salim Limited LLC to Hope Suppliers LLC.

173. On or about March 19, 2021, AHMED OMAR-HASHIM wrote a \$7,000 check from Olive Management Inc. to Eidleh Inc.

174. On or about March 23, 2021, SALIM SAID wrote a \$7,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.

175. On or about March 25, 2021, SALIM SAID wrote a \$7,000 check from Salim Limited LLC to Eidleh Inc.

176. On or about May 27, 2021, SALIM SAID wrote a \$14,000 check from Cosmopolitan Business Solutions to Eidleh Inc.

177. On or about May 27, 2021, AHMED OMAR-HASHIM wrote a \$7,000 check from Olive Management to Eidleh Inc.

178. On or about August 13, 2021, ABDULKADIR SALAH obtained a \$310,000 cashier's check from Cosmopolitan Business Solutions LLC to AIMEE MARIE BOCK.

All in violation of Title 18, United States Code, Section 371.

Counts 16-40
(Federal Programs Bribery)

179. Paragraphs 146 through 180 are incorporated herein.

180. On or about the dates set forth below, in the State and District of Minnesota, and elsewhere, the defendants as set forth below, corruptly gave, offered and agreed to give anything of value to any person with intent to influence and reward an agent of an organization, as set forth below, in connection with any business, transaction and series of transactions of each organization involving

anything of value of \$5,000 or more, where such organization received benefits in excess of \$10,000 annually under federal programs involving grants, contracts, subsidies, loan guarantees, insurance and other forms of federal assistance in any one-year period, as follows:

Count	Defendant(s)	Date (on or about)	Payment
16	ABDIKERM EIDLEH SALIM SAID	July 28, 2020	A \$1,500 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
17	ABDIKERM EIDLEH SALIM SAID	August 20, 2020	A \$2,500 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
18	ABDIKERM EIDLEH SALIM SAID	September 15, 2020	A \$5,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
19	ABDIKERM EIDLEH SALIM SAID	November 25, 2020	A \$5,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
20	ABDIKERM EIDLEH ABDULKADIR SALAH	November 28, 2020	A \$5,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
21	ABDIKERM EIDLEH ABDIHAKIM AHMED	December 30, 2020	A \$14,000 check from ASA Limited LLC to Hope Suppliers LLC
22	ABDIKERM EIDLEH ABDULKADIR SALAH	January 8, 2021	A \$7,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
23	ABDIKERM EIDLEH AHMED GHEDI	January 8, 2021	A \$5,000 payment from AG Limited LLC to ABDIKERM EIDLEH
24	ABDIKERM EIDLEH ABDULKADIR SALAH	January 18, 2021	A \$7,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
25	ABDIKERM EIDLEH AHMED OMAR-HASHIM	January 18, 2021	A \$24,000 check from Olive Management Inc. to Eidleh Inc.
26	ABDIKERM EIDLEH ABDIHAKIM AHMED	January 29, 2021	A \$7,000 check from ASA Limited LLC to Hope Suppliers LLC

27	ABDIKERM EIDLEH ABDINASIR ABSHIR	February 8, 2021	A \$56,000 check from Horseed Management LLC to Eidleh Inc.
28	ABDIKERM EIDLEH ABDINASIR ABSHIR	February 8, 2021	A \$56,000 check from Horseed Management to Bridge Logistics LLC
29	ABDIKERM EIDLEH ABDIKADIR MOHAMUD	February 19, 2021	A \$68,333 check from Tunyar Trading LLC to Eidleh, Inc.
30	ABDIKERM EIDLEH ABDIKADIR MOHAMUD	February 19, 2021	A \$68,333 check from Tunyar Trading LLC to Hope Suppliers LLC
31	ABDIKERM EIDLEH ABDIKADIR MOHAMUD	February 19, 2021	A \$68,333 check from Tunyar Trading to Bridge Logistics LLC
32	ABDIKERM EIDLEH SALIM SAID	February 25, 2021	A \$14,000 check from Salim Limited LLC to Eidleh Inc.
33	ABDIKERM EIDLEH AHMED OMAR HASHIM	March 1, 2021	A \$7,000 check from Olive Management Inc. to Eidleh Inc.
34	ABDIKERM EIDLEH SALIM SAID	March 9, 2021	A \$14,000 check from Salim Limited to Hope Suppliers LLC
35	ABDIKERM EIDLEH AHMED OMAR-HASHIM	March 19, 2021	A \$7,000 check from Olive Management Inc. to Eidleh Inc.
36	ABDIKERM EIDLEH SALIM SAID	March 23, 2021	A \$7,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
37	ABDIKERM EIDLEH SALIM SAID	March 25, 2021	A \$7,000 check from Salim Limited to Eidleh Inc.
38	ABDIKERM EIDLEH SALIM SAID	May 27, 2021	A \$14,000 check from Cosmopolitan Business Solutions LLC to Eidleh Inc.
39	ABDIKERM EIDLEH AHMED OMAR-HASHIM	May 27, 2021	A \$7,000 check from Olive Management Inc. to Eidleh Inc.
40	AIMEE BOCK ABDULKADIR SALAH	August 13, 2021	A \$310,000 check from Cosmopolitan Business Solutions to BOCK

All in violation of Title 18, United States Code, Sections 666(a)(1)(B) and (a)(2).

Count 41

(Conspiracy to Commit Money Laundering)

181. Paragraphs 1 through 141 are incorporated herein.

182. From at least in or about April 2020 through in or about January 2022, in the State and District of Minnesota, the defendants,

ABDIKERM ABDELAHI EIDLEH,
SALIM AHMED SAID,
ABDULKADIR NUR SALAH,
AHMED SHARIF OMAR-HASHIM,
also known as "Salah Donyale,"
ABDI NUR SALAH,
ABDIHAKIM ALI AHMED,
AHMED MOHAMED ARTAN,
ABDIKADIR AINANSHE MOHAMUD,
also known as "AK,"
ABDINASIR MAHAMED ABSHIR,
ASAD MOHAMED ABSHIR,
HAMDI HUSSEIN OMAR,
AHMED ABDULLAHI GHEDI, and
ABDIRAHMAN MOHAMUD AHMED,
also known as "Chef Abcos."

conspired with each other and with others known and unknown to the Grand Jury to conduct and attempt to conduct financial transactions knowing that the property involved in such transactions represented the proceeds of some sort of unlawful activity and which, in fact, involved the proceeds of a specific unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, and knowing those transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specific unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Purpose and Object of the Conspiracy

183. The purpose and object of the conspiracy was to conceal, hide, and launder the proceeds of the fraudulent scheme to obtain Federal Child Nutrition Program funds.

Manner and Means of the Conspiracy

184. The conspirators used the following manner and means, among others, to accomplish the objects and purpose of the conspiracy:

a. The defendants created limited liability companies for use in hiding the source and ownership of proceeds of the fraudulent scheme to obtain Federal Child Nutrition Program funds.

b. Some of these companies purported to be meal vendors providing meals and food to the Federal Child Nutrition Program sites. In reality, these companies were shells designed to disguise the source and ownership of the proceeds of the fraud scheme.

c. The defendants also created shell companies in order to receive, misappropriate, and launder the proceeds of their fraud scheme.

d. The defendants transferred funds among their shell companies in order to conceal the source of nature of the funds. After laundering the proceeds of their scheme, the defendants used their shell companies to purchase real estate, cars, and other personal items.

e. On or about September 4, 2020, SALIM SAID, ABDIHAKIM AHMED, and AHMED GHEDI created a company called ASA Limited LLC to carry out the fraudulent scheme. ASA Limited purported to be a meal vendor company that

provided food and meals to be served at the ASA Limited site in St. Paul. In reality, SALIM SAID, ABDIHAKIM AHMED, and AHMED GHEDI used ASA Limited as a shell company to obtain and launder fraud proceeds. In all, SALIM SAID, ABDIHAKIM AHMED, and AHMED GHEDI deposited more than \$4 million in Federal Child Nutrition Program funds into ASA Limited bank accounts.

f. On or about September 7, 2020, AHMED OMAR-HASHIM created a company called Olive Management Inc. to carry out the fraudulent scheme. Olive Management purported to be a meal vendor company that provided food and meals to be served at the Olive Management site in St. Cloud, Minnesota. In reality, AHMED OMAR-HASHIM used Olive Management as a shell company to obtain and launder fraud proceeds. In all, AHMED OMAR-HASHIM deposited more than \$6 million in Federal Child Nutrition Program funds into Olive Management bank accounts.

g. On or about September 28, 2020, ABDIKADIR MOHAMUD created a company called Tunyar Trading LLC to carry out the fraudulent scheme. Tunyar Trading purported to be a meal vendor company that provided food and meals to be served at the Stigma-Free Willmar site. In reality, ABDIKADIR MOHAMUD used Tunyar Trading as a shell company to obtain and launder fraud proceeds. In all, ABDIKADIR MOHAMUD deposited more than \$5 million in Federal Child Nutrition Program funds into Tunyar Trading bank accounts.

h. On or about October 7, 2020, ABDI SALAH and AHMED ARTAN acquired control over Stigma-Free International for use in carrying out the fraud scheme. Stigma-Free International purported to be a non-profit company involved in

providing free meals to children at various sites around the state of Minnesota. In reality, ABDI SALAH and AHMED ARTAN used Stigma-Free International as a shell company to obtain and launder fraud proceeds. In all, AHMED ARTAN deposited more than \$10 million in Federal Child Nutrition Program funds into Stigma-Free International bank accounts.

i. On or about October 9, 2020, ABDINASIR ABSHIR and ASAD ABSHIR created a company called Horseed Management LLC to carry out the fraudulent scheme. Horseed Management purported to be a food vendor company that provided food and meals to be served at the Stigma-Free Mankato site. In reality, ABDINASIR ABSHIR and ASAD ABSHIR used Horseed Management as a shell company to obtain and launder fraud proceeds. In all, ABDINASIR ABSHIR and ASAD ABSHIR deposited more than \$5 million in Federal Child Nutrition Program funds into Horseed Management bank accounts.

j. On or about March 17, 2021, ABDIHAKIM AHMED created 1130 Holdings LLC to carry out the fraudulent scheme. 1130 Holdings LLC purported to be a food vendor company that provided food and meals to be served at a Federal Child Nutrition Program site in St. Paul. In reality, ABDIHAKIM AHMED used 1130 Holdings as a shell company designed to obtain and launder fraud proceeds. In all, ABDIHAKIM AHMED deposited more than \$1 million in Federal Child Nutrition Program funds into 1130 Holdings bank accounts.

k. On or about April 9, 2021, HAMDI OMAR created a company called Feeding Our Youth LLC, ostensibly to run the Stigma-Free Waite Park site. Feeding Our Youth purported to be a food vendor company that provided food and

meals to be served at the Stigma-Free Waite Park site. In reality, HAMDI OMAR used Feeding Our Youth as a shell company designed to obtain and launder fraud proceeds. In all, HAMDI OMAR deposited more than \$1 million in Federal Child Nutrition Program funds into Feeding Our Youth bank accounts.

185. As part of the conspiracy, the defendants also created a series of companies for use in receiving their cut of the fraud proceeds while hiding the source and their ownership of those funds.

186. For example, on or about July 30, 2020, SALIM SAID created Salim Limited LLC. SAID used Salim Limited LLC as a shell company to hide and disguise the source and ownership of his portion of the fraud proceeds. From in or about August 2020 to January 2022, SAID deposited more than \$6 million in Federal Child Nutrition Program funds into Salim Limited LLC bank accounts. Among other things, he used this money to purchase real estate and cars.

187. ABDULKADIR SALAH used 3017 LLC as a shell company to hide and disguise the source and ownership of his portion of the fraud proceeds. Between in or about November 2020 and January 2022, ABDULKADIR SALAH deposited more than \$4 million in Federal Child Nutrition Program funds into 3017 LLC bank accounts. Among other things, he used this money to purchase real estate and cars.

188. On or about May 14, 2021, SALIM SAID, ABDULKADIR SALAH and ABDIRAHMAN AHMED, also known as "Chef Abcos," registered Afrikan Village LLC with the Ohio Secretary of State. SALIM SAID, ABDULKADIR SALAH, and ABDIRAHMAN AHMED each transferred more than \$800,000 in Federal Child Nutrition Program funds to an Afrikan Village bank account in June and July 2021.

They then used this money to purchase a commercial building in Columbus, Ohio, that formerly housed the Columbus Culinary Institute for approximately \$2.4 million.

189. ABDIRAHMAN AHMED also used another company, Afra Grill LLC, to receive and launder his share of the fraud proceeds. Between approximately September 2020 to May 2021, ABDIRAHMAN AHMED deposited more than \$2 million in Federal Child Nutrition Program funds into Afra Grill accounts. He then transferred the bulk of this money into his personal bank accounts. Among other things, ABDIRAHMAN AHMED used this money to purchase a single-family home in Delaware, Ohio, and a Lexus RX350 sport utility vehicle.

190. On or about December 14, 2020, AHMED GHEDI created AG Limited LLC. GHEDI used AG Limited as a shell company to hide and disguise the source and ownership of his portion of the fraud proceeds. Between December 2020 and November 2021, AHMED GHEDI deposited more than \$2 million in Federal Child Nutrition Program funds into AG Limited LLC bank accounts. GHEDI used this money to purchase more than \$245,000 in motor vehicles, to fund more than \$200,000 in credit card spending, and to purchase real estate.

191. On or about January 11, 2021, ABDINASIR ABSHIR created Calikamin Enterprise LLC. ABDINASIR ABSHIR used Calikamin Enterprise LLC as a shell company to hide and disguise the source and ownership of his portion of the fraud proceeds. In 2021, ABDINASIR ABSHIR deposited more than \$1.8 million in Federal Child Nutrition Program funds into Calikamin Enterprise bank accounts. He used the money to pay personal expenses and fund international travel.

192. On or about January 11, 2021, ASAD ABSHIR registered Santana LLC with the Minnesota Secretary of State. ASAD ABSHIR used Santana LLC as a shell company to hide and disguise the source and ownership his cut of the fraud proceeds. In 2021, ASAD ABSHIR deposited more than \$750,000 in Federal Child Nutrition Program funds into Santana LLC bank accounts. He used this money to, among other things, pay for personal spending, international travel, and to purchase a 2022 GMC Sierra 1500 pickup truck for approximately \$78,000.

193. On or about September 24, 2020, HAMDI OMAR registered Omar Management Corporation, which she used as a shell company to receive and launder her cut of the fraud proceeds.

194. ABDI SALAH created two shell companies to receive and launder his share of the fraud proceeds. On or about January 20, 2021, ABDI SALAH created Stone Bridge Development LLC, which he used as a shell company to receive and launder his share of the fraud proceeds. ABDI SALAH used Stone Bridge Development LLC to receive more than \$1 million in Federal Child Nutrition Program funds, which he used to purchase real estate and to fund his own personal spending.

195. ABDI SALAH then sent much of the money to other entities he created in order to purchase real estate, including \$200,000 to ANS Projects LLC, an entity that ABDI SALAH created in August 2021. ABDI SALAH used ANS Projects LLC to purchase a multi-family home in Minneapolis along with another individual involved in the scheme to fraudulently obtain Federal Child Nutrition Program funds, Sharmarke Issa.

196. In October 2021, ABDI SALAH, ABDIKADIR MOHAMUD, AHMED ARTAN, ABDIHAKIM AHMED, and AHMED OMAR-HASHIM created a shell company Five A's Projects LLC, a shell company in which they were all equal partners. ABDI SALAH, ABDIKADIR MOHAMUD, AHMED ARTAN, ABDIHAKIM AHMED, and AHMED OMAR-HASHIM together transferred more than \$1 million in Federal Child Nutrition Program funds to Five A's Projects LLC, which they used to purchase the former location of Kelly's 19th Hole, a bar and restaurant in Brooklyn Park, Minnesota.

197. ABDIKERM EIDLEH created and used a number of shell companies to receive and conceal the bribe and kickback payments he received from individuals involved in the fraud scheme, including Hope Suppliers LLC, Bridge Logistics LLC, Bridge Consulting and Logistics LLC, and Eidleh Inc. In all, he deposited more than \$5 million in kickbacks, bribes, and other fraud proceeds into bank accounts opened in the name of these companies.

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

Counts 42-61
(Money Laundering)

198. Paragraphs 1 through 141 and 183 to 196 are incorporated herein.

199. On or about the dates listed below, in the State and District of Minnesota and elsewhere, the defendants as set forth below, knowingly engaged and attempted to engage in monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, as describe below, such property having been derived

from specified unlawful activities, namely, wire fraud, in violation of Title 18, United States Code, Section 1343:

Count	Defendant(s)	Date (on or about)	Transaction
42	SALIM SAID	February 24, 2021	Payment of approximately \$47,000 towards the purchase of a 2021 Chevrolet Silverado truck
43	AHMED GHEDI	March 3, 2021	Payment of approximately \$114,887 to Gretna Auto Outlet for the purchase of a 2021 Cadillac Escalade
44	SALIM SAID	March 4, 2021	Payment of approximately \$60,000 towards the purchase of a 2021 Mercedes Benz GLA
45	ABDINASIR ABSHIR	March 8, 2021	Payment of approximately \$45,000 towards the purchase of a 2021 Land Rover
46	AHMED GHEDI	March 25, 2021	Payment of approximately \$35,000 to Dodge of Burnsville towards the purchase of a 2020 Dodge Charger Hellcat
47	AHMED OMAR-HASHIM	April 27, 2021	Payment of approximately \$100,000 towards the purchase of the single-family home located at 1336 Vincent Avenue N, Minneapolis, Minnesota
48	ABDIRAHMAN AHMED	May 4, 2021	Payment of approximately \$42,233 towards the purchase of a 2021 Lexus RX350
49	ABDIKERM EIDLEH	May 6, 2021	Payment of approximately \$95,000 towards mortgage on residence at 15101 County Road 5, Burnsville, Minnesota
50	ABDIHAKIM AHMED	May 17, 2021	Payment of approximately \$44,037 towards the

			purchase of a 2022 Mini Cooper S Countryman
51	SALIM SAID	July 1, 2021	Purchase of the single-family home located at 5150 Alvarado Lane N, Plymouth, Minnesota, for approximately \$1,175,000 million
52	SALIM SAID ABDULKADIR SALAH	July 26, 2021	Purchase of the commercial building located at 2722-42 Park Avenue S, Minneapolis, Minnesota for approximately \$2,735,000
53	AHMED GHEDI	July 29, 2021	A check for approximately \$48,474 to Dodge of Burnsville towards the purchase of a 2021 Dodge Ram 1500
54	AHMED OMAR-HASHIM	August 9, 2021	Payment of approximately \$30,000 towards the purchase of a 2020 Lexus RX 350
55	ABDIKADIR MOHAMUD	August 11, 2021	Payment of approximately \$39,276 towards the purchase of the single-family home located at 1485 66th Avenue NE, Fridley, Minnesota
56	AHMED GHEDI	August 26, 2021	A \$45,000 wire transfer to Eurocar of Costa Mesa for the lease of a 2021 Mercedes S-Class S580 sedan
57	SALIM SAID ABDULKADIR SALAH ABDIRAHMAN AHMED	August 30, 2021	Payment of approximately \$2.4 million towards the purchase of the commercial building located at 2435 Stelzer Road, Columbus, Ohio
58	ABDULKADIR SALAH, ABDI SALAH, ABDIKAHAKIM AHMED, AHMED ARTAN, AHMED OMAR-HASHIM	October 22, 2021	Purchase of the bar and restaurant located at 8432 Noble Avenue N, Brooklyn Park, Minnesota, for approximately \$1 million

59	ABDI SALAH	October 29, 2021	Purchase of the residential property located at 2529 12th Avenue South, Minneapolis, Minnesota, for approximately \$386,000
60	ABDIRAHMAN AHMED	November 12, 2021	Payment of approximately \$291,981 towards the purchase of a single-family home located at 185 Harness Way, Delaware, Ohio
61	ASAD ABSHIR	December 30, 2021	Payment of approximately \$77,353 towards the purchase of a 2022 GMC Sierra 1500 truck

All in violation of Title 18, United States Code, Section 1957.

FORFEITURE ALLEGATIONS

1. Counts 1 through 61 of this Indictment are incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) in conjunction with Title 28, United States Code, Section 2461(c), and pursuant to Title 18, United States Code, Section 982(a)(1).

2. If convicted of any of Counts 1-40 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to Counts 1-40 of the Indictment.

3. If convicted of any of Counts 41-61 of this Indictment, the defendants shall also forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in a transaction or

attempted transaction in violation of 18 U.S.C. §§ 1956 and 1957 and any property traceable to such property.

4. The property subject to forfeiture includes, but is not limited to:
 - a. \$3,506,066.80 seized from Bank of America account No. 374004673156, held in the name of Feeding Our Future DBA Teaching Our Future, (AIMEE BOCK);
 - b. \$6,347.85 seized from US Bank, account No. 104791224223, held in the name of AIMEE BOCK;
 - c. \$179,455.87 seized from US Bank, account No. 204788895306, held in the name of AIMEE BOCK;
 - d. 2013 Porsche Panamera, VIN: WP0AA2A79DL015044, registered to AIMEE BOCK;
 - e. \$13,462.00 in U.S. Currency seized from AIMEE BOCK on January 20, 2022;
 - f. miscellaneous clothing, accessories and jewelry seized from 13299 Bronze Parkway, Rosemount, Minnesota (the residence of AIMEE BOCK), on January 20, 2022;
 - g. miscellaneous electronics seized from 13299 Bronze Parkway, Rosemount, Minnesota (the residence of AIMEE BOCK), on January 20, 2022;
 - h. miscellaneous clothing, accessories and jewelry seized from 5150 Alvarado Lane, Plymouth, Minnesota (the residence of SALIM SAID), on January 20, 2022;

- i. miscellaneous electronics seized from 5150 Alvarado Lane, Plymouth, Minnesota (the residence of SALIM SAID), on January 20, 2022;
- j. TD Ameritrade acct no. 235832888 held in the name of ABDIKERM EIDLEH, (\$500,948.72 balance at the time of seizure);
- k. Firearms seized from 2722 Park Avenue, Minneapolis, Minnesota the registered business location of Cosmopolitan Business Solutions (PSA serial number SCB003791 and Anderson serial number 20113938);
- l. miscellaneous Electronics seized from 2722 Park Avenue, Minneapolis, Minnesota the registered business location of Cosmopolitan Business Solutions;
- m. Coinbase account in the name of EIDLEH valued at \$94,984.36 at the time of seizure in January 2022;
- n. \$1,231.07 seized from Bell Bank, account No. 6521110434, in the name of ASA Limited LLC (ABDIHAKIM AHMED, SALIM SAID, and AHMED GHEDI);
- o. \$309,882.51 seized from Bell Bank account No. 6521112638 held in the name of Cosmopolitan Business Solutions D.B.A. Safari Restaurant;
- p. \$435,512.44 seized from Bell Bank account No. 6521116548 held in the name 3017 LLC (ABDULKADIR SALAH);
- q. \$378,207.20 seized from JPMorgan Chase Bank account No. 702380061 held in the name of Tunyar Trading LLC (ABDIKADIR MOHAMUD);
- r. \$472,889.08 seized from Northeast Bank account number1075100 held in the name of 3017 LLC (ABDULKADIR SALAH);

- s. \$343,418.98 seized from Star Choice Credit Union account No. 31109-10 held in the name of Stone Bridge Development, LLC (ABDI SALAH);
- t. \$424,762.51 seized from Think Mutual Bank account No. 7450000590146 held in the name of Santana LLC (ASAD ABSHIR);
- u. \$973.03 seized from Wells Fargo Bank account No. 6817825661 held in the name of SALIM SAID;
- v. \$196,744.11 seized from Wells Fargo Bank account No. 3665380451 held in the name of Salim Limited LLC (SALIM SAID);
- w. \$5,050.20 seized from Wells Fargo Bank account No. 6338840173 held in the name of Salim Limited LLC (SALIM SAID);
- x. \$300,790.88 seized from Wells Fargo Bank account No. 9988038718 held in the name of Olive Management Inc. (AHMED OMAR-HASHIM);
- y. \$96,130.50 seized from Wells Fargo Bank account No. 2133303996, held in the name of AHMED OMAR-HASHIM;
- z. \$664,812.22 seized from Bank of America account No. 374004831833 held in the name Bridge Consulting and Logistics LLC (ABDIKERM EIDLEH);
- aa. \$95,085.21 seized from JPMorgan Chase Bank account No. 706558175 held in the name of Delta Food Services LLC (ABDIKERM EIDLEH);
- bb. \$88,779.49 seized from JPMorgan Chase Bank account No. 675303306 held in the name of Math Tech Tutoring LLC (ABDIKERM EIDLEH);
- cc. \$320.00 seized from JPMorgan Chase Bank account No. 3860250571 held in the name of Math Tech Tutoring LLC (ABDIKERM EIDLEH);

dd. \$31,372.65 seized from JPMorgan Chase Bank account No. 776023092, held in the name of Hope Suppliers LLC (ABDIKERM EIDLEH);

ee. \$33,513.74 seized from Wells Fargo Bank account No. 3230374864, held in the name of Eidleh Inc. (ABDIKERM EIDLEH);

ff. miscellaneous Electronics seized from 3055 Old Highway 8, St. Anthony, Minnesota;

gg. 2018 Lexus RX 350, VIN 2T2BZMCA1JC153144, registered to Sagal Aden (ABDIRAHMAN AHMED);

hh. 2022 GMC Sierra 1500 Ltd. Denali, VIN: 3GTU9FEL9NG140144, registered to Santana LLC (ASAD ABSHIR);

ii. 2021 Chevrolet Silverado, VIN: 1GC4YUEY4MF160143, registered to SALIM SAID;

jj. 2021 Mercedes Benz GLA, VIN: 4JGFF5KE1MA421736, registered to SALIM SAID and Individual A.C.;

kk. 2022 Mini Cooper S Countryman, VIN: WMZ83BR09N3N39411, registered to ABDIHAKIM AHMED;

ll. 2021 Jeep Grand Cherokee, VIN: 1C4RJFN96MC659204, registered to AHMED GHEDI;

mm. 2020 Lexus RX, VIN: 2T2HZMDA0LC212244, registered to OMAR SHARIFF OMAR-HASHIM;

nn. 2021 Range Rover, VIN: SALWV2SE2MA776221, registered to ABDINSANIR ABSHIR;

oo. The real property located at 2722 Park Avenue South, Minneapolis, Minnesota;

pp. The real property located at 2742 Park Avenue South, Minneapolis, Minnesota;

qq. The real property located at 5150 Alvarado Lane, Plymouth, Minnesota;

rr. The real property located at 2529 12th Avenue South, Minneapolis, Minnesota;

ss. The real property located at 8432 Noble Avenue, North Brooklyn Park, Minnesota, known previously as Kelly's 19th Hole.

tt. The real property located at 15101 County Road 5, Burnsville, Minnesota;

uu. The real property located at 1336 Vincent Avenue N, Minneapolis, Minnesota;

vv. The real property located at 185 Harness Way, Delaware, Ohio;
and

ww. The real property located at 2435 Stelzer Road, Columbus, Ohio.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON

MINNESOTA
JUDICIAL
BRANCH