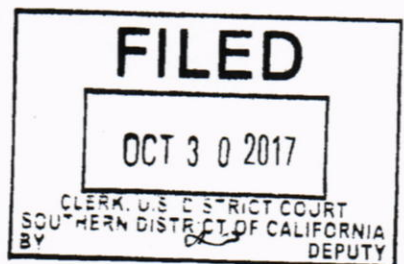


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA



UNITED STATES OF AMERICA,
Plaintiff,

vs.

RENAN DIAS DA ROCHA GOMES,
Defendant.

Magistrate Case No. _____

COMPLAINT FOR VIOLATION OF
Title 18, U.S.C., Sec. 1343 – Wire
Fraud

17MJ4059

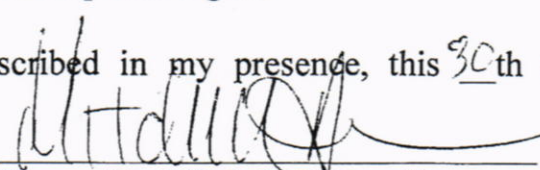
The undersigned complainant being duly sworn states:

Beginning upon the high seas, and elsewhere out of the jurisdiction of any particular State or district, from in or about October 2015 until October 27, 2017, defendant RENAN DIAS DA ROCHA GOMES did knowingly devise and intend to devise, with the intent to defraud, a material scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and omissions of materials facts, and in furtherance thereof transmitted and caused to be transmitted by means of wire and radio communication in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds for the purpose of executing such scheme and artifice to defraud, including a transmission from the VeriFone payment system aboard the Disney Wonder while on the high seas on or about October 25, 2017; all in violation of Title 18, United States Code Section 1343.

This complaint is based on the facts in the attached probable cause statement, which is incorporated herein by reference.


Joyce Deniz
FBI Special Agent

Sworn to before me and subscribed in my presence, this 30th day of October, 2017.


Honorable Mitchell D. Dembin
United States Magistrate Judge

PROBABLE CAUSE STATEMENT

I declare under penalty of perjury that the above statement of probable cause is true and correct:

I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to White-Collar Crimes. I have been an FBI agent for approximately 11 years. This probable cause statement is based upon information obtained from several sources, including but not limited to, information received from law enforcement, The Walt Disney Company ("Disney"), corporate records, my personal observations, and knowledge gained from my training and experience. Because this statement is written and offered for the limited purpose of establishing probable cause, it does not contain all of the information that the United States possesses relative to this investigation.

According to investigators with Disney, RENAN DIAS DA ROCHA GOMES ("GOMES") executed a scheme to defraud Disney while employed aboard the cruise ship named the Disney Wonder ("Disney Wonder"). In or about October 2015 and continuing up to and including October 27, 2017, GOMES was employed as a merchandise host and assigned to work in the merchandise stores aboard the Disney Wonder. GOMES executed a scheme to defraud Disney by fraudulently obtaining money by means of false and fraudulent pretenses and concealment of material facts, using his access to the VeriFone payment system in order to embezzle funds from Disney for his own personal benefit for which he was not otherwise entitled. As part of his scheme to defraud Disney, GOMES executed approximately \$275,000 in unauthorized charges to Disney's bank account, and loaded the value of the funds onto Disney gift cards while working in the merchandise stores aboard the Disney Wonder. On at least one occasion, GOMES used a means of identification of another person to conceal the fact that GOMES accessed the VeriFone payment system to defraud Disney.

From April 23, 2017 through May 7, 2017, GOMES spent approximately \$35,000 of the embezzled funds for his own personal benefit by taking his family on a Disney World vacation. While on this vacation, GOMES used the gift cards with the embezzled funds on lodging, food, beverage, merchandise, and entertainment. GOMES spent approximately \$8,700 on lodging. GOMES also spent approximately \$26,400 on food, beverage, merchandise, and entertainment.

On or about October 25, 2017, GOMES while upon the high seas, and elsewhere out of the jurisdiction of any particular State or district, for the purpose of executing and attempting to execute the above-described scheme, knowingly caused to be transmitted by means of wire and radio communication in interstate and foreign

commerce certain writings, signs, signals, pictures, and sounds, to wit: a wire transmission from the VeriFone payment system located on the Disney Wonder to Disney's bank account located in the United States related to the unauthorized charge of approximately \$1,000, which GOMES then loaded onto a Disney gift card for his own personal use and benefit, and for which he was not entitled.

On October 27, 2017, FBI agents met the Disney Wonder as it made port in San Diego, California. FBI agents boarded the ship and met with GOMES in the captain's conference room. At that time, FBI agents advised GOMES of his *Miranda* rights in the English-language. GOMES stated that he understood English and his rights and was willing to answer questions without an attorney present. GOMES admitted to fraudulently uploading funds on to gift cards using the VeriFone payment system saying that he realized it was easy to divert these Disney funds for his own personal use and benefit. GOMES further admitted that he began by embezzling approximately \$40, and realized that nothing happened to him. He immediately thereafter began loading the limit amount of \$1,000 onto multiple gift cards while working on the ship. GOMES admitted that he had been executing his scheme for approximately three years, and that he first began defrauding Disney working in the merchandise store while aboard the Disney Wonder out at sea. GOMES also admitted that he spent a substantial amount of the embezzled funds to take his family on a lavish vacation to Disney World in 2017. GOMES admitted that he knew that he was not authorized or entitled to any of the funds he stole from Disney's bank account which he loaded on to the gift cards. GOMES was arrested and transported to the Metropolitan Correctional Center in San Diego, California.

Executed on October 27, 2017 at 5:26 p.m.


JOYCE DENIZ
Special Agent

Federal Bureau Investigation

On the basis of the facts presented in the probable cause statement consisting of 2 pages, I find probable cause to believe that the defendant named in the probable cause statement committed the offense beginning in or about October 2015 and continuing up to and including October 27, 2017, in violation of 18 U.S.C. § 1343.


HONORABLE MITCHELL D. DEMBIN
United States Magistrate Judge

9:01 PM, Oct 27, 2017

Date/Time