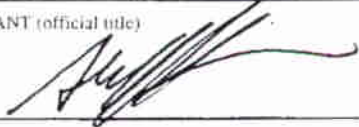



United States District Court		DISTRICT Eastern District of Pennsylvania	
UNITED STATES OF AMERICA v. JEFFREY BRUTEYN		DOCKET NO.	
		MAGISTRATE'S CASE NO.	
Complaint for violation of Title 18 United States Code § 1542			
NAME OF JUDGE OR MAGISTRATE Honorable L. FELIPE RESTREPO		OFFICIAL TITLE U.S. Magistrate Judge	LOCATION Philadelphia, PA
DATE OF OFFENSE October 25, 2007	PLACE OF OFFENSE Philadelphia, PA	ADDRESS OF ACCUSED (if known)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION On October 25, 2007, in Philadelphia, PA., Jeffrey Bruteyn willfully and knowingly made a false statement in an application for passport with the intent to induce or secure the issuance of a passport under the authority of the United States, either for his own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED. SEE AFFIDAVIT ATTACHED HERETO.			
MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT (official title) Alex E. Zuchman 	
		OFFICIAL TITLE Special Agent, United States Department of State	
Sworn to before me and subscribed in my presence.			
SIGNATURE OF MAGISTRATE ¹⁾  Honorable L. FELIPE RESTREPO, United States Magistrate Judge		DATE 2/26/08	

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JEFFREY BRUTEYN

WARRANT FOR ARREST

CASE NUMBER:

To: The United States Marshal and any Authorized
United States Officer

YOU ARE HEREBY COMMANDED to arrest JEFFREY BRUTEYN

and bring him or her forthwith to the nearest magistrate judge to answer a

*C Complaint

charging him or her with (brief description of offense)

On October 25, 2007, in Philadelphia, PA., Jeffrey Bruteyn willfully and knowingly made a false statement in an application for passport with the intent to induce or secure the issuance of a passport under the authority of the United States, either for his own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws.

In violation of Title 18, United States Code, Section 1542

Honorable L. FELIPE RESTREPO

United States Magistrate Judge

Name of Issuing Officer

Title of Issuing Officer



2/26/08

Philadelphia, PA

Signature of Issuing Officer

Date and Location

Bail fixed at \$ _____ by _____
Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

[Agent's Name]
[Agent's Title], [Agency Name]

[First Initial/Last Name AUSA] Authorizing

AFFIDAVIT

I, Alex E. Zuchman, being duly sworn, do hereby depose and state the following:

1. I am a Special Agent with the United States Department of State, Diplomatic Security Service (DSS), and have been so employed since September 2004. Prior to joining the DSS, I was a Marine for approximately eight years. My responsibilities at DSS include conducting investigations into criminal violations of the laws governing the issuance of United States Passports and travel documents used to transit international borders, and the protection of dignitaries both domestically and abroad. Because this affidavit is submitted for the limited purpose of establishing probable cause for a Criminal Complaint, it does not include every fact known by me in connection with this investigation.
2. Jeffrey BRUTEYN is the subject of a joint Federal Bureau of Investigation and Security and Exchange Commission investigation in Dallas, Texas.
3. In August 2007, BRUTEYN, who knew he was under investigation, was asked by Assistant United States Attorney Jeffrey Ansley in Dallas, Texas, to turn in his United States passport as a gesture of good faith. The passport was received by FBI Special Agent Deen Abbott on September 7, 2007.
4. Numerous sources have relayed to the FBI that BRUTEYN possesses several passports and that he intends to flee to Europe on February 26, 2008. A records check reveals that after BRUTEYN turned his passport into the FBI, in October of 2007, he went to Philadelphia, PA and applied for a new passport. During this process, BRUTEYN submitted a "Statement Regarding a Lost or Stolen Passport," in which he claims that the old passport "was accidentally removed from my office with old documents." This statement is false, because BRUTEYN knowingly turned in the referenced passport to the United States Attorney's office in Dallas.

Texas. BRUTEYN signed the form at the bottom on October 25, 2007.

5. Several FBI recordings of BRUTEYN's girlfriend, Tonia Stevens, reveal discussions of fleeing to Europe with BRUTEYN, as well as discussions involving BRUTEYN's ability to launder money.

6. Based upon the above information learned during the investigation of a lead from the Diplomatic Security office in Dallas, TX and the FBI office in Dallas, TX, I have probable cause to believe that Jeffrey BRUTEYN, DPOB: 1970, Lancaster, PA, violated federal law by committing the following felony offense:

a) On October 26, 2007 at the Philadelphia Passport Agency, located at 2nd and Chestnut Streets, in Philadelphia, Pennsylvania willfully and knowingly made false statements in an application for a U.S. Passport, by submitting an intentionally deceptive Statement Regarding a Lost or Stolen Passport, with the intent to secure the issuance of a passport under the authority of the United States, for the use of himself, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, in violation of Title 18 United States Code, Section 1542.

7. Therefore, your Affiant respectfully requests an arrest warrant be issued for Jeffrey BRUTEYN.



ALEX E. ZUCHMAN, SPECIAL AGENT
DIPLOMATIC SECURITY SERVICE
UNITED STATES DEPARTMENT OF STATE

Sworn to before me this
26th day of February 2008.



HONORABLE L. FELIPE RESTREPO
UNITED STATES MAGISTRATE JUDGE