

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

No. 10-2580 RLD

UNITED STATES OF AMERICA

vs.

KRISTOPHER HENRIQSON and
GRANT VON MANSTEIN MORSE,

Defendants.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 14, 2003? _____ Yes x No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to September 1, 2007? _____ Yes x No

Respectfully submitted,

JEFFREY H. SLOMAN
UNITED STATES ATTORNEY

BY: 

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United States District Court

SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

KRISTOPHER HENRIQSON and
GRANT VON MANSTEIN MORSE

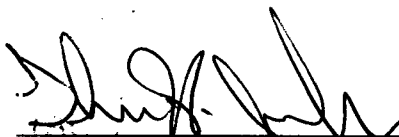
CASE NUMBER:

10-2580RLD

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about April 28, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants, KRISTOPHER HENRIQSON and GRANT VON MANSTEIN MORSE, did knowingly and with intent to defraud traffic in and use one or more unauthorized access devices during a one-year period, and by such conduct obtain a thing of value aggregating \$1,000 or more, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

I further state that I am a Special Agent of the U.S. Secret Service and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT.



Signature of Complainant
THOMAS JOHNSON, SPECIAL AGENT
U.S. SECRET SERVICE

Sworn to before me, and subscribed in my presence,

APRIL 29, 2010

Date

at Miami, Florida

City and State

ROBERT L. DUBÉ
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

I, Thomas Johnson, being duly sworn, depose and say:

1. I am a Special Agent of the United States Secret Service ("USSS"), and I have been so employed since January 2009. As a USSS Special Agent ("SA"), I am responsible for the investigation of violations of United States law, including violations of Title 18 of the United States Code. I have received extensive training in the investigation of access device fraud and identity theft, among other things.
2. The information in this affidavit is based on my personal knowledge and information obtained from others, including other law enforcement personnel. The information set forth here is provided solely for the purpose of establishing probable cause in support of the criminal complaint. Because this affidavit is submitted for the limited purpose of establishing probable cause, it does not include all of the details of the investigation of which your affiant is aware.
3. On or about April 28, 2010, at approximately 5:42 p.m., officers of the Aventura Police Department observed a green van sitting in the Aventura Mall parking lot, in Aventura, Florida, in the Southern District of Florida. Officers observed an individual, later identified as Grant Von Manstein MORSE, sitting in the van's driver seat. Officers observed an individual, later identified as Kristopher HENRIQSON, walk through the parking lot carrying a Louis Vuitton brand bag and get into the van's passenger seat. Officers observed HENRIQSON appear to rummage through the bag, while MORSE sat next to him. MORSE then left the van and entered the Aventura Mall. Approximately six minutes later, HENRIQSON left the van and entered the mall.
4. Officers observed HENRIQSON walk into a Sony Style electronics store and purchase a

laptop computer. Officers then observed HENRIQSON meet briefly with MORSE in one of the mall's atria. MORSE and HENRIQSON then split up and left the mall separately. Officers observed MORSE walk to the green van and slide into the passenger seat from a crouched position. Shortly thereafter, HENRIQSON walked to the van and entered the driver side.

5. While MORSE and HENRIQSON were in the mall, officers heard a radio call reporting a burglary of a gym locker at the Equinox gym, located on the third floor of the mall. According to the radio call, the victim's bag and wallet had been taken. A marked unit of the Aventura Police Department proceeded to Equinox.

6. Officers approached the green van and asked HENRIQSON and MORSE for identification. HENRIQSON produced a Florida driver license. However, MORSE claimed that he did not have any identification on him, including any driver license or credit cards. MORSE voluntarily exited the van and began to pat his pockets, as if he was searching for his wallet. Through the open door, an officer observed what appeared to be two (2) American Express credit cards on the passenger seat that MORSE had just vacated. The officer asked MORSE if the cards belonged to him, and MORSE gave a non-verbal shrug. The officer also observed an open Louis Vuitton bag between the driver and passenger seat, as well as a black Louis Vuitton wallet on the floorboard of the passenger seat. The officer then observed that the name on the credit cards was "D.V." The officer asked MORSE, "Who is 'D.V.'?" using only "D.V.'s" first name. MORSE responded that he did not know "D.V."

7. The officer confirmed via radio that "D.V." was the victim of the reported burglary at Equinox, and that "D.V." had given a description of a bag and wallet matching the bag and wallet observed in the van. The officers then confirmed with employees of the Sony Style store

that a laptop had been purchased at approximately 6:44 p.m. using an American Express card ending in 11008 belonging to "D.V." The laptop cost approximately \$2,674.99, including tax. Both HENRIQSON and MORSE were placed under arrest.

8. An inventory search of the van discovered a total of four (4) American Express credit cards belonging to "D.V." The inventory search also discovered the Sony laptop, an Apple laptop, a flat-screen television, and a bag of children's sneakers, among other items.

9. HENRIQSON and MORSE were placed in a marked police vehicle equipped with a recording device. A recording of the conversation between MORSE and HENRIQSON included MORSE suggesting to HENRIQSON that they not "tell on" each other.

10. In a post-*Miranda* interview, MORSE admitted to participating in three separate thefts of credit cards from gym lockers that day. MORSE further admitted that the cards were used to make purchases of electronics and other items.

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11. Based upon the foregoing your affiant attests that there is probable cause to believe that Kristopher HENRIQSON and Grant Von Manstein MORSE did knowingly and with intent to defraud, traffic in and use one or more unauthorized access devices during a one-year period, and by such conduct obtain a thing of value aggregating \$1,000 or more, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



THOMAS JOHNSON, SPECIAL AGENT
UNITED STATES SECRET SERVICE

Sworn and subscribed before
me this 29th day of April, 2010



HONORABLE ROBERT L. DUBE
UNITED STATES MAGISTRATE JUDGE