

UNITED STATES DISTRICT COURT
for the
Middle District of Florida

United States of America
v.
Mario Cesar Dos Santos, Jr.
Case No. 5:26-mj-1025-PRL
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 27, 2025 in the county of Orange in the
Middle District of Florida, the defendant(s) violated:

Code Section Offense Description
18 U.S.C. § 506(a)(2) Unlawful Use of Government Seals

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Special Agent [Redacted], DHS OIG
Printed name and title

Sworn to before me over the telephone or other reliable electronic means and signed by me
pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: January 30, 2026

[Signature]
Judge's signature

City and state: Ocala, Florida

Philip R. Lammens, U.S. Magistrate Judge
Printed name and title

STATE OF FLORIDA

CASE NO. 5:26-mj-1025-PRL

COUNTY OF MARION

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, [REDACTED], being duly sworn, depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the U.S. Department of Homeland Security (“DHS”), Office of Inspector General (“OIG”), and have been employed in that capacity since July 2023. Prior to July 2023, I was employed as a Special Agent with the U.S. Air Force Office of Special Investigations (“AFOSI”) since October 2017, which is when I graduated from the Federal Law Enforcement Training Center (“FLETC”). I earned a bachelor’s degree in Intelligence Studies from the American Military University in Ranson, West Virginia, a master’s degree in National Securities Studies with a concentration in Cybersecurity from the American Military University in Ranson, West Virginia, as well as a Computer Information Systems certification from Lanier Technical College in Cumming, GA.

2. I have investigated felony economic crime violations since August 2019 and I currently investigate allegations of major felony fraud, waste, abuse, and corruption associated to the DHS, which includes agencies such as the U.S. Secret Service, U.S. Coast Guard, and the Federal Emergency Management Agency (“FEMA”). As a law enforcement officer of the United States, I am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in the

United States Code that are associated with the DHS. In my investigative experience, I have written multiple search warrants and executed multiple search and arrest warrants.

3. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging MARIO CESAR DOS SANTOS, JR. (“DOS SANTOS”) with fraudulent use of government seals, in violation of 18 U.S.C. § 506(a).

4. I submit this affidavit based on information known to me personally from the investigation, as well as information obtained from others who have investigated this matter or who have personal knowledge of the facts herein. Since this affidavit is submitted for the limited purpose of obtaining a criminal complaint, I have not included each and every fact known to me related to the underlying investigation. Rather, I have set forth only the facts that I believe are necessary to support probable cause for the issuance of a criminal complaint charging DOS SANTOS with the above-described criminal offense.

APPLICABLE LAW

5. Pursuant to 18 U.S.C. § 506(a), it is a violation of federal law if someone (1) falsely makes, forges, counterfeits, mutilates, or alters the seal of any department or agency of the United States, or any facsimile thereof; (2) knowingly uses, affixes, or impresses any such fraudulently made, forged, counterfeited, mutilated, or altered seal or facsimile thereof to or upon any certificate, instrument, commission, document, or paper of any description; or (3) with fraudulent intent, possesses, sells, offers for sale, furnishes, offers to furnish, gives away, offers to give away, transports, offers to

transport, imports, or offers to import any such seal or facsimile thereof, knowing the same to have been so falsely made, forged, counterfeited, mutilated, or altered.

PROBABLE CAUSE

6. In August 2025, DHS OIG initiated an investigation into Chaplain Emergency Management Agency Inc. (“CEMA”), an organization falsely claiming to be an agency of the United States. The investigation began after FEMA received reports via email from individuals indicating that CEMA and its president, DOS SANTOS,¹ were falsely representing themselves as affiliates of DHS and FEMA and fraudulently using the agencies’ seals to charge individuals to attend “Chaplaincy Training Courses” in Florida and other locations.

Civilian Interviews

7. As part of the investigation, I, along with other DHS OIG agents, conducted interviews of six individuals who reported having attended one of these courses in Clermont, Lake County, Florida, on July 26, 2025. These interviews were conducted in Portuguese and translated by a DHS OIG Special Agent who is fluent in the language. Generally, the interviewees provided the following information:

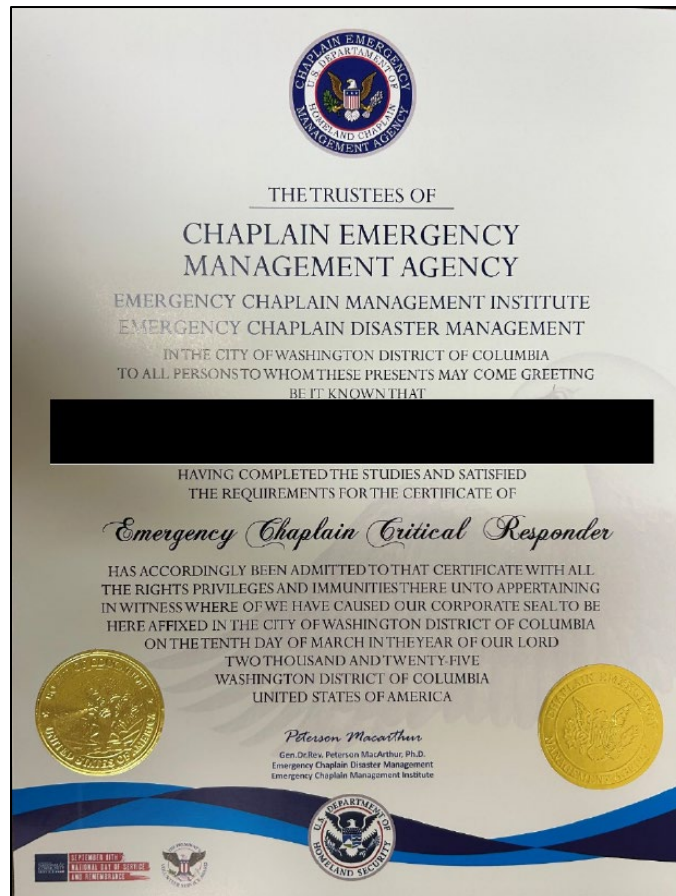
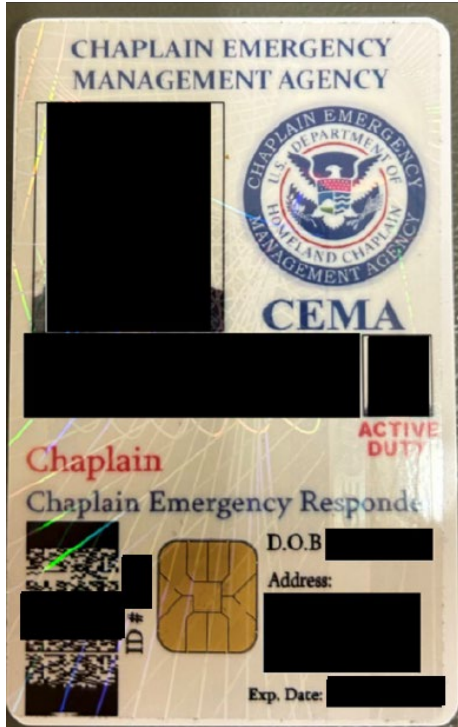
a. CEMA holds chaplain certification courses throughout the country for predominantly Brazilian immigrants and foreign nationals. DOS SANTOS told attendees that CEMA partnered with FEMA and that CEMA and its courses were endorsed by FEMA.

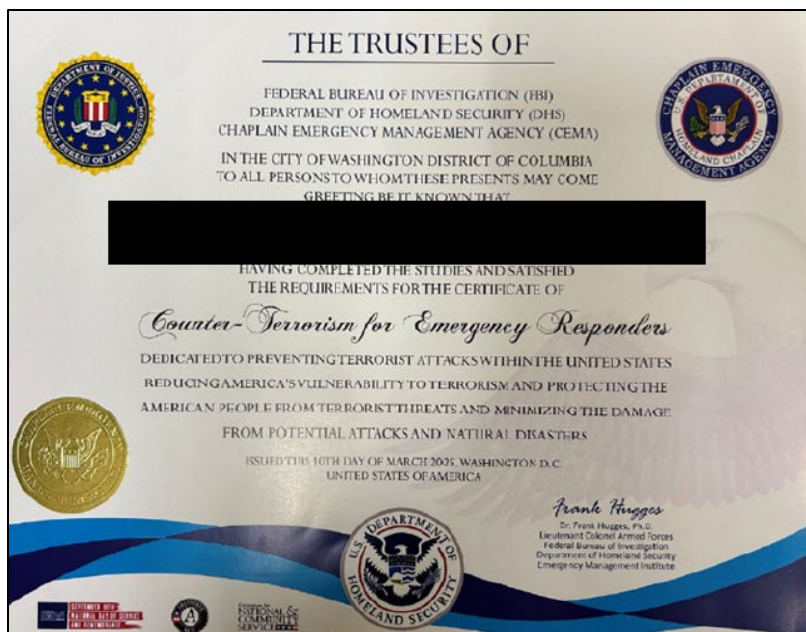
¹ The identification of DOS SANTOS by law enforcement is described later in this affidavit.

b. The courses were free to attend, but CEMA charged attendees approximately \$400 to \$450 for the chaplaincy certification. Upon completing the course and paying the associated fees, DOS SANTOS provided the attendees with an identification (“ID”) card and course completion certificates containing the DHS seal, as well as a law enforcement badge.

c. Included below are photographs of the ID card and certificates that DOS SANTOS provided to one of the interviewees.² As shown in the photographs, the front of the ID card contains one of CEMA’s logos, which is the DHS seal, modified to state, “U.S. Department of Homeland Chaplain.” The back of the ID card contains the DHS/FEMA seal (with no alterations). The certificates contain a slightly different version of the CEMA logo—an older version of the FEMA seal, modified to state, “U.S. Department of Homeland Chaplain”—and the FBI seal. Neither DOS SANTOS nor CEMA have authorization to use the seals of DHS, FEMA, or FBI, nor are they otherwise affiliated with DHS, FEMA, FBI, or any other agency of the federal government.

² These items are currently in the custody of DHS OIG.





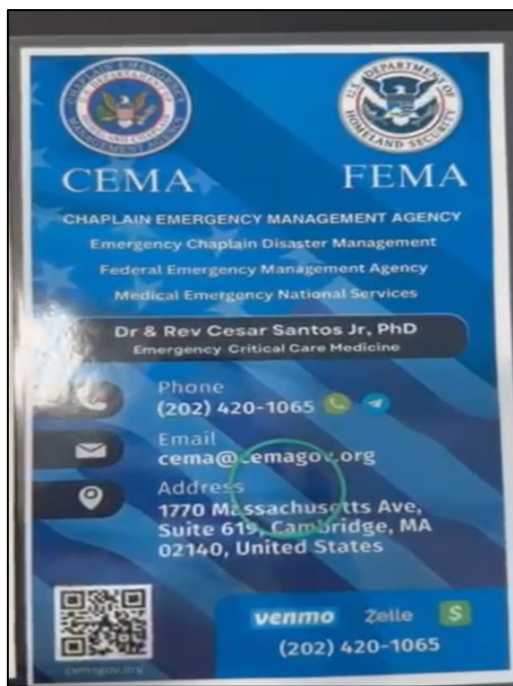
d. DOS SANTOS explained to the attendees that the ID cards and badges authorized them to support law enforcement during emergency situations and take control of emergency situations until law enforcement arrived. He also told them that this would give them a level of immunity from immigration enforcement and would keep them safe from deportation.

e. DOS SANTOS also had various CEMA merchandise for sale at the training, including polo shirts, bumper stickers, jackets, badges, and badge holders—all bearing either the DHS or FEMA seal. Four of the interviewees stated they purchased merchandise and paid for it via Zelle³ using a telephone number provided by DOS SANTOS: 202-[REDACTED].⁴ One of the interviewees also paid \$35

³ Zelle is a digital payment network that allows users to send and receive money directly between U.S. bank accounts using the end user's phone number or email address. It can be used through the bank's mobile app or the Zelle website.

⁴ As explained below, records subpoenaed from Zelle corroborate these payments.

for what DOS SANTOS claimed was an FBI background check. This fee was also paid via Zelle using the same phone number. Below are screenshots from a video, provided by one of the interviewees, showing some of the merchandise:



f. Attendees were also given access to a CEMA WhatsApp group chat, which DOS SANTOS uses to communicate with them and promote upcoming

courses. At the time the interviews were conducted, the group had approximately 759 members. The phone number used by DOS SANTOS to communicate in the WhatsApp group is the same phone number used for the Zelle transactions.

Undercover Operation

8. On September 27, 2025, DHS OIG and the FBI conducted an undercover operation at a CEMA training course held on that date from 8:00 a.m. to 5:00 p.m. in Orlando, Florida. As part of the operation, an FBI Confidential Human Source (CHS) attended the training and was equipped with audio and video recording equipment. One of the individuals that DHS OIG interviewed regarding the course in Clermont (“W1”) also attended and assisted agents in the operation. The course was conducted in Portuguese and was translated in real time by a DHS OIG Special Agent who is fluent in the language.

9. The CEMA training event began with an introduction from DOS SANTOS, wherein he discussed the CEMA training program and CEMA’s background. DOS SANTOS introduced himself as a Harvard graduate with a medical degree and spoke to the attendees, which included approximately 30 to 45 individuals, about health and diets.⁵ DOS SANTOS discussed the importance of being a member of CEMA and the prestige that came with being a CEMA training graduate.

10. One of the event’s speakers, who presented himself as a police officer, spoke about counterterrorism and conducted a presentation with the FBI seal. The

⁵ Agents subsequently confirmed that Dos Santos does not have a medical degree and is not a Harvard graduate.

police officer spoke about policing and terrorism, the role of a policeman during a terrorist attack, and what it means to be a chaplain. The officer added that a terrorist attack aims to create chaos, and one must develop the ability to not panic and bring stability to others. Soon after this police officer spoke, DOS SANTOS showed a short video regarding safety in active shooter situations.

11. Throughout the course of the training, DOS SANTOS presented multiple videos and discussed numerous topics. DOS SANTOS stated he was a pastor and a physician, and that once a week he works at FEMA. DOS SANTOS then showcased videos about the terrorist attacks of September 11, 2001, and terrorism. DOS SANTOS also stated that the federal government gave him permission to carry an AR-15 rifle in his vehicle.

12. During the event, W1 had a conversation with an unidentified female CEMA volunteer, who stated that her CEMA badge helped her get through an airport's security with no issues and that, because she displayed her CEMA badge, she did not have to pay for her extra luggage. The unidentified female CEMA volunteer also told W1 that having her CEMA shirt inside her suitcase made a difference when airport security scanned her luggage with an X-Ray. There were also numerous merchandise items present for sale with DHS seals and altered FEMA seals such as an ID Card holder, bumper stickers, Polo shirts with CEMA seals, and badges with CEMA seals. Consistent with the information presented by the witnesses discussed above, participants had to pay \$450 for the certificate and the badge along with the CEMA ID.

13. At the conclusion of the training, the CHS purchased, with cash, the following items from CEMA:



ID Holder with DHS Seal



Bumper Sticker with DHS Seal and Altered FEMA Seal



Badge with FEMA Seal



Polo Shirt with Altered Seals

Review of Relevant Records

14. According to records filed with the Commonwealth of Massachusetts Corporations Division, CEMA is a non-profit organization founded in Massachusetts on September 13, 2022. The four Annual Reports (2022 through 2025) filed by CEMA

list “MARIO C DOS SANTOS” as the organization’s President and Director. The latest filing is a “Certificate of Change of Directors or Officers,” filed on October 17, 2025, which lists “MARIO C DOS SANTOS” as the organization’s President, Treasurer, Clerk, and Director.

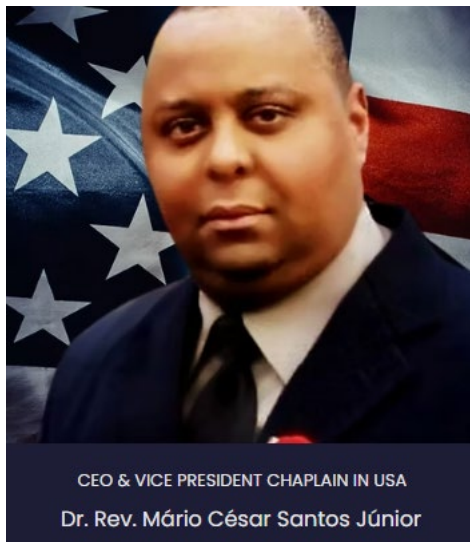
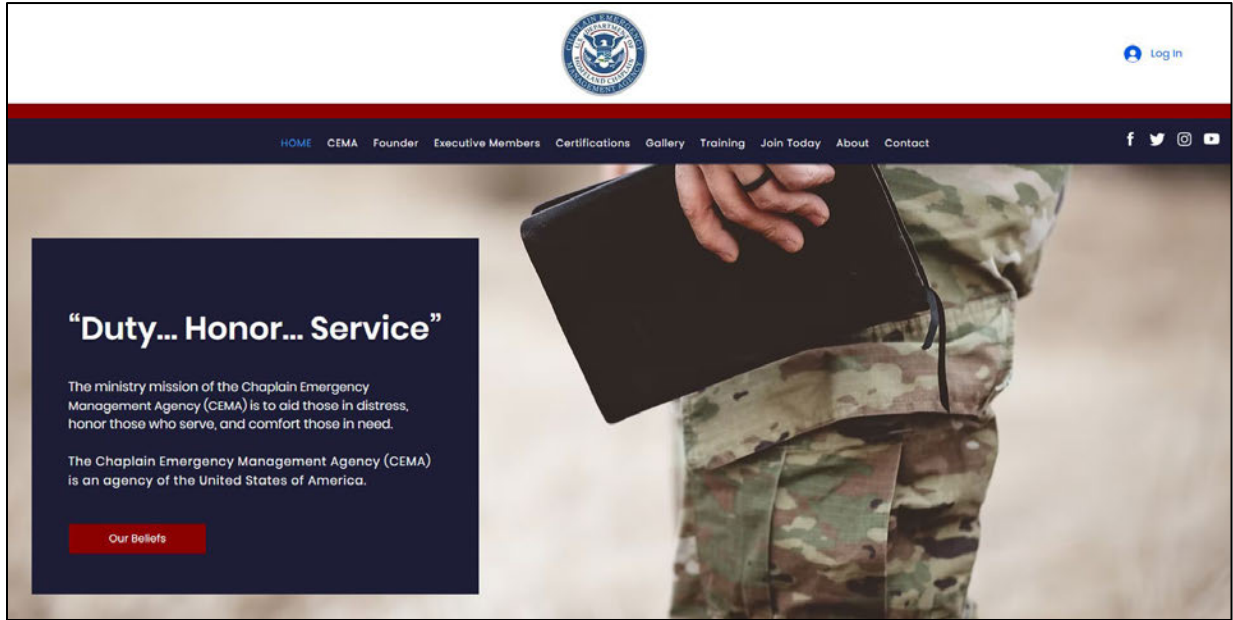
15. Records subpoenaed from Zelle in October 2025 show that the phone number DOS SANTOS provided for the payment of fees and merchandise at the July 2025 training (██████████) is associated with “MARIO JUNIOR” (as noted, DOS SANTOS’s full name is Mario Cesar Dos Santos, Jr.) and “CHAPLAIN EMERGENCY MANAGEMENT AGENCY INC.” The records revealed numerous transactions with “payment memos”⁶ referencing CEMA (e.g., “chaplain course,” “chaplain equipment,” “certification – cema,” “CEMA”). A number of these transactions are from July 26, 2025 (the date of the CEMA training in Clermont) and corroborate the attendees’ statements to agents regarding their purchases at the training.

Review of CEMA Website and Social Media

16. As part of the investigation, DHS OIG reviewed CEMA’s website: www.cemagov.org, which is the website that appears on the ID cards and the website that attendees provided to agents. The website displays the CEMA logo, which as noted above, is an altered version of the DHS logo. The website also falsely identifies CEMA as “agency of the United States” in various places, including its main

⁶ Zelle users can add a “memo” or note to a transaction to explain its purpose.

homepage. The website also identifies DOS SANTOS as CEMA’s CEO and Vice President. Screen captures of the website are shown below:



17. The website claims that CEMA was founded in 1980 by the “Presidential Reorganization Plan No. of 1980 and implemented by two Executive Orders on April 1, 1982.” As explained above, official records filed with the Massachusetts Corporations Division indicate that CEMA was founded on September 13, 2022.

18. CEMA's public social media profiles on Facebook (emergencychaplainphd) and Instagram (@chaplainemergency) each contain CEMA's logo (an altered version of the DHS seal) and falsely identify CEMA as a government organization or federal agency. They also contain numerous photographs of events and/or trainings using government seals.



Screenshot of Instagram Page



Screenshot of Facebook Page

19. DHS does not maintain a centralized Chaplain Corps, but some of its components, like FEMA, use chaplains or other faith-based support personnel in limited, case-by-case roles. The DHS Center for Faith-Based & Neighborhood

Partnerships collaborates with FEMA and faith communities to coordinate disaster resilience and community engagement. In September 2025, S. Lou Billyer, DHS OIG Assistant Special Agent in Charge, confirmed with the Acting Director of the DHS Center that CEMA is not associated with FEMA and that neither CEMA nor DOS SANTOS is associated with the DHS Center.

20. Throughout the course of this investigation, DHS OIG has coordinated with U.S. Citizenship and Immigration Services (“USCIS”) personnel, who confirmed that DOS SANTOS is a nonimmigrant overstay who is eligible for removal from the United States. Further, a USCIS Form I-360, Petition for Amerasian, Widow(er), or Special Immigrant application, was previously submitted on behalf of DOS SANTOS. According to USCIS, the application was officially denied on June 9, 2025, and, as such, DOS SANTOS will now begin removal proceedings with the first hearing tentatively scheduled to take place on January 29, 2026.

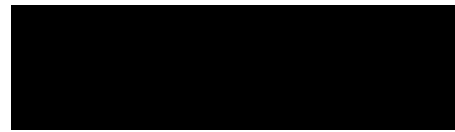
21. According to USCIS’s records and the information DOS SANTOS provided to USCIS, DOS SANTOS entered the United States on March 12, 2016. Many of the documents provided to USCIS in support of DOS SANTOS’s immigration application appeared to be altered or contained false information. This included numerous CEMA documents, records, and certificates; a “Certificate of Ordination,” and a 1999 Bachelor of Theology Diploma from the “University of Berkley” in Michigan. An open-source records search revealed the University does not exist. There were also multiple news articles regarding a previous investigation into the production of thousands of fraudulent “University of Berkley” diplomas.

CONCLUSION

22. Based on the foregoing facts, I respectfully submit there is probable cause to charge DOS SANTOS with a violation of 18 U.S.C. § 506(a)(2).

This concludes my affidavit.

Respectfully submitted,



Special Agent
U.S. Department of Homeland
Security Office of Inspector General

Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by telephone or other reliable electronic means consistent with Fed. R. Crim. P. 4.1 before me this 30th day of January 2026.

A handwritten signature in blue ink that reads "P. Lammens".

PHILIP R. LAMMENS
United States Magistrate Judge