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26-12259 [1]

COVER SHEET
FOR
PROBABLE CAUSE

FROM:	Detective Brittany Lowery #624 Florida Department of Financial Services Criminal Investigations Division
DATE:	August 27, 2026
TELEPHONE:	(850) 413-3913 / (850) 320-1709
E-MAIL:	Brittany.Lowery@myfloridacfo.com
SUBJECT:	Johnson Cuffy, Serena Ann Morrisey, Tracy Hunter Sharika Morgan, Ruel B. Green Jr., Charletta Gordon, and Sylvester Cuffy
CASE NUMBER:	23-1891

CHARGES:

Johnson Cuffy

§ 817.034(4)(a)1, Fla. Stat. – Scheme to Defraud >$50,000– First Degree Felony

§ 775.0844(5)(d), Fla. Stat. – Aggravated White Collar – First Degree Felony

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State Agencies Impacted

Florida Division of Corporations

The Florida Division of Corporations, hereafter referred to as Sunbiz, is the official state agency responsible for registering and overseeing business entities. It acts as the main hub for business filings and public records, handling the formation of corporations, LLCs, and partnerships, processing annual reports, and maintaining more than 8 million records that enable businesses to operate legally within Florida.

Florida Division of Unclaimed Property

The Florida Division of Unclaimed Property (DUP) serves as the state's guardian of lost or forgotten assets—like inactive bank accounts, uncashed checks, and the contents of safe deposit boxes—working to return them to their rightful owners. It receives these assets from businesses after 1–5 years of inactivity, safeguards them indefinitely, and enables residents to search for and claim their property at no cost through FLTreasureHunt.gov.

Both agencies are in Tallahassee, Florida.

The Scheme/Probable Cause

Between 2022 and 2024, Johnson Cuffy and his associates engaged in an organized scheme to defraud the State of Florida Department of Financial Services (DFS), DUP by utilizing public records to file fraudulent claims for unclaimed property. The suspects were located in multiple counties within Florida including Miami-Dade, Broward, Hillsborough and Polk, and the victim (Florida Department of Unclaimed Property) is located in Leon County. The fraudulent claims were initiated online and then involved mailed documents, telephone calls, faxes or emails to the victim.

During this investigation, your affiant identified approximately 57 fraudulent claims made by the suspects. The suspects attempted to obtain $1,990,533.71; however, were only successful in obtaining $240,566.58. The fraudulent claims were identified as being linked to the following legitimate organizations:

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Countrywide Homes Loans Inc., Ditech Financial, IndyMac Venture LLC, Creekside Mortgage Services, Washington Mutual, American Home Mortgage, Aegis Mortgage Company, First Franklin, GMAC Mortgage, Argent Mortgage, Sand Canyon Corporation, Ameriquest Mortgage, New Century Mortgage, New Residential Investments, and Nationstar Mortgage, Bluekap Assets Recovery, Inc., MMA Mortgage Investment Corporation and Citigroup Global Markets.

Due to the magnitude of this investigation, this document will provide detailed information on only the claims paid by DUP.

Countrywide Home Loans Inc.

In this case, the suspect(s) located money being held by DUP for Countrywide Home Loans Inc. According to the Sunbiz website, the 2022 Annual Report for Countrywide Home Loans Inc., lists [redacted] and others as officers of the company.

**It should be noted the annual reports are available via open public record, on the Sunbiz website.*

The suspect(s) then filed for a business license under a similar name, Countrywide Home Loans Depot (Sunbiz filing #L22000295263). Filing records provided by DC showed that the 2022 [redacted]

Records with DC show that the above-listed document was filed on 6/22/2022, by Serena [redacted]

The 2023 Annual Report for Countrywide Home Depot (document # 4694310050CC) shows [redacted]

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Per the Florida Division of Treasury (DOT), the bank of first deposit was Wells Fargo.

A subpoena production from Wells Fargo Bank revealed the above-listed warrant was deposited into account [redacted] on September 7, 2022. The account was opened on July 25, 2022, in Bartow, Florida, and it belongs to Countrywide Home Loans Depot, LLC., under the sole signature authority of [redacted] SSN #[redacted]

The Wells Fargo production provided a record of Zelle transactions that were made using the account. It was determined that funds were sent to Tracy Hunter ($1,225) and Serena Morrisey ($790), CashApp transactions to Cuff Banderas ($8,622.14), payments to Docupost.com, Sunbiz, Mailform and Anytime Mailbox within weeks of the fraudulently obtained check deposit.

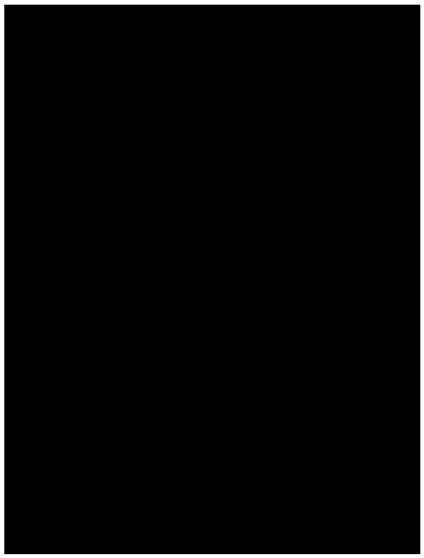
The Zelle transactions to Serena Morrisey were sent to a Citibank account. A subpoena production for Serena Brown (Aka Serena Morrisey's) Citibank account ending in [redacted] revealed:

> Between September 18 and October 11, 2022, [redacted] was sent $890.00
> Between September 22 and October 22, 2023, Sylvester Cuffy was sent $1100.00.

A subpoena production from IONOS for the email address [redacted] revealed an alternate email address of [redacted] A search warrant of the Google address revealed communication between Johnson Cuffy and Serena Morrisey where Morrisey advised she is sitting outside of Wells Fargo and then proceeds to send Johnson photographs of the Countrywide check and a debit card that corresponds to the account (see below).

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Morrisey then sent him the Notice of Hold from Regions Bank with the customer's name Nationstar Mortgage and Loans Inc. This is the deposit receipt from [redacted] deposit where she was in the driver's seat of the vehicle.

Conclusion

Between 2022 and 2024, Johnson Cuffy, an inmate serving a sentence for racketeering orchestrated an unclaimed property scheme which required him to utilize contacts outside of the prison facility to help him complete the fraudulent claims to the Florida Division of Unclaimed Property. The investigation revealed that Johnson Cuffy would obtain documentation and file the initial claims with DUP and then send the claim forms and documents to individuals who were not incarcerated for them to sign the documents and mail them to DUP. Based on the investigation, the checks from the fraudulent claims would then either be mailed to the individual who Johnson was working with, or they would go to a community mailbox for another co-defendant to pick up. Once obtained, the checks would get deposited and funds would be dispersed between the individuals who mailed the claim, cashed the check, or other members of the scheme to defraud who were involved in the claim. *It should be noted that each fraudulent claim would often have different people working on the scheme.*

Your affiant believes Johnson Cuffy is the orchestrator of the fraud scheme. Between 2022 and

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2024, Johnson Cuffy and his associates successfully obtained $240,566.58 based on the above stated facts, I believe that probable cause exists to charge the DEFENDANT, **Johnson Cuffy** with a violation of F.S.S. 817.034 (4)(a)(1), - Organized Scheme to Defraud >$50,000 and F.S.S. 775.0844(5)(d) – Aggravated White-Collar Crime.

Serena Morrisey, Johnson's girlfriend, was seen in CCTV footage at Regions Bank when [redacted] deposited the fraudulent Nationstar Mortgage warrant for $12,571.84. Morrisey was the signature authority of the TD Bank account the $11,776.19 Nationstar Mortgage check was deposited. Morrisey sent and received funds from [redacted] who is the signature authority of the Countrywide Wells Fargo account where the fraudulently obtained $12,238.31 Countrywide Home Loans, Inc. warrant was deposited, additionally Morrisey sent photographs of the check and debit card for Kelly's Countrywide account, showing she was at the bank. Morrisey received $9,600 from the fraudulently obtained IndyMac Venture, LLC check that was deposited into Ruel Green's fraudulent bank account. Morrisey received funds from the fraudulently obtained First Franklin checks that were deposited into a fraudulent Wells Fargo account for Charletta Gordon. Communication records between Morrisey, Johnson, Daniel Cox, Morgan, and Green Jr. only further confirm Morrisey's involvement in the scheme to defraud. Based on the above stated facts, I believe that probable cause exists to charge the DEFENDANT, **Serena Ann Morrisey** with a violation of F.S.S. 817.034 (4)(a)(1), - Organized Scheme to Defraud >$50,000.

Tracy Hunter, an associate of Johnson Cuffy is on surveillance withdrawing money from a fraudulent created Bank of America account for [redacted] where the $12, 258.15 fraudulent obtained DUP warrant for Ameriquest Mortgage was deposited. Communications between Tracy Hunter and Johnson Cuffy show that not only was Hunter involved in the scheme, but that Hunter brought his girlfriend, Sharika Morgan into the scheme as well. Johnson Cuffy and Hunter's conversation revealed that Hunter was the individual who deposited the $20,383.73 fraudulently obtained warrant into Sharika Morgan's Regions Bank account in the name of Ameriquest. Based on the above stated facts, I believe that probable cause exists to charge the DEFENDANT, **Tracy Hunter** with a violation of F.S.S. 817.034 (4)(a)(2), - Organized Scheme to Defraud $20,000<$100,000.

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