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IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA,

vs. **OSP CASE NUMBER: 2024-OSP-0902**

(A) RUEL GREEN JR. 26010679CF10A
(B) TRACY HUNTER 26010907CF10A
(C) JOHNSON CUFFY
(D) SYLVESTER CUFFY 26010646CF10A
(E) SERENA MORRISEY 26010598CF10A
(F) SHARIKA MORGAN 26010906CF10A
(G) CHARLETTA GORDON 26011882CF10A

Defendants.
_____/

This Information incorporates by reference the arrest affidavits and orders determining probable cause filed in Broward County Court Case Numbers above

STATE'S FIRST AMENDED INFORMATION

COUNT 1: **ORGANIZED SCHEME TO DEFRAUD, MORE THAN $50,000.00**
F.S. 817.034(4)(a)1 & 777.011
F1-L7
(DEFENDANT C ONLY)

COUNT 2: **ORGANIZED SCHEME TO DEFRAUD, MORE THAN $20,000.00, LESS THAN $50,000.00**
F.S. 817.034(4)(a)(2) & 777.011
F2-L5
(DEFENDANTS A, B, D, E, F AND G ONLY)

COUNT 3: **CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**
F.S. 817.568(2)(a) & 777.011
F3-L4
(DEFENDANT A ONLY)

COUNT 4: **CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**
F.S. 817.568(2)(a) & 777.011
F3-L4
(DEFENDANT G ONLY)

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IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA

COUNT I
ORGANIZED SCHEME TO DEFRAUD
(MORE THAN $50,000.00)

BRADLEY R. MCVAY, Statewide Prosecutor for the State of Florida, by and through the undersigned Senior Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about **March 4, 2022**, and continuing through and including on or about **February 29, 2024,** in the Seventeenth, Second, Fifth, Eleventh, and Thirteenth Judicial Circuits, to-wit: Broward, Leon, Marion, Miami-Dade, and Hillsborough Counties, Florida, and any judicial circuit and county in the State of Florida pursuant to Fla. Stat. § 910.15, **JOHNSON CUFFY** did engage in a scheme to defraud, to-wit: a systematic, ongoing course of conduct with the intent to defraud one or more persons, to-wit: **THE STATE OF FLORIDA AND/OR THE FLORIDA DIVISION OF UNCLAIMED PROPERTY AND/OR OTHERS,** or with the intent to obtain property from **THE STATE OF FLORIDA AND/OR THE FLORIDA DIVISION OF UNCLAIMED PROPERTY AND/OR OTHERS** by false or fraudulent pretenses, representations, endorsements of nonconsenting parties, or promises or willful misrepresentations of a future act, and did obtain property, to-wit: United States Currency, with an aggregate value of $50,000.00 or more in violation of Fla. Stat. § 817.034(4)(a)l and § 777.011.

COUNT II
ORGANIZED SCHEME TO DEFRAUD
(MORE THAN $20,000.00, LESS THAN $50,000.00)

BRADLEY R. MCVAY, Statewide Prosecutor for the State of Florida, by and through the undersigned Senior Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about **March 4, 2022**, and continuing through and including on or about **February 29, 2024**, in the Seventeenth, Second, Fifth, Eleventh, and Thirteenth Judicial Circuits, to-wit: Broward, Leon, Marion, Miami-Dade, and Hillsborough Counties, Florida, and any judicial circuit and county in the State of Florida pursuant to Fla. Stat. § 910.15, **RUEL GREEN JR. and TRACY HUNTER and SYLVESTER CUFFY and SERENA MORRISEY and SHARIKA MORGAN and CHARLETTA GORDON** did engage in a scheme to defraud, to-wit: a systematic, ongoing course of conduct with the intent to defraud one or more persons, to-wit: **THE STATE OF FLORIDA AND/OR THE FLORIDA DIVISION OF UNCLAIMED PROPERTY AND/OR OTHERS,** or with the intent to obtain property from **THE STATE OF FLORIDA AND/OR THE FLORIDA DIVISION OF UNCLAIMED PROPERTY AND/OR OTHERS** by false or fraudulent pretenses, representations, endorsements of nonconsenting parties, or promises or willful misrepresentations of a future act, and did obtain property, to-wit: United States Currency, with an aggregate value of more than $20,000.00, but less than $50,000.00 in violation of Fla. Stat. §817.034(4)(a)2 and §

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777.011.

COUNT III
CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION

BRADLEY R. MCVAY, Statewide Prosecutor for the State of Florida, by and through the undersigned Senior Assistant Statewide Prosecutor, under oath, CHARGES that on or about **February 8, 2024,** in the Seventeenth, Thirteenth, Fifth, and Second Judicial Circuits, to wit: Broward, Hillsborough, Marion, and Leon Counties, Florida, and any judicial circuit and county in the State of Florida pursuant to Fla. Stat. § 910.15, **RUEL GREEN JR.** did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, the personal identification information of **INDYMAC VENTURE** without first obtaining **INDY MAC'S** consent, contrary to Fla. Stat. § 817.568(2)(a) and § 777.011.

COUNT IV
CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION

BRADLEY R. MCVAY, Statewide Prosecutor for the State of Florida, by and through the undersigned Senior Assistant Statewide Prosecutor, under oath, CHARGES that on or about **January 26, 2024, and/or February 6, 2024**, in the Seventeenth Thirteenth Judicial Circuit, to wit: Broward and Hillsborough County, Florida, and any judicial circuit and county in the State of Florida pursuant to Fla. Stat. § 910.15, **CHARLETTA GORDON** did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, the personal identification information of **FIRST FRANKLIN** without first obtaining **FIRST FRANKLIN'S** consent, contrary to Fla. Stat. § 817.568(2)(a) and § 777.011.

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AND SAID OFFENSES OCCURRED IN TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA AS PART OF A RELATED TRANSACTION OR SAID OFFENSES WERE CONNECTED WITH AN ORGANIZED CRIMINAL CONSPIRACY AFFECTING TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA AND/OR SAID OFFENSES WERE FACILITATED BY OR CONNECTED TO THE USE OF THE INTERNET.

BRADLEY R. MCVAY
STATEWIDE PROSECUTOR
STATE OF FLORIDA

Patrick Gilday
Senior Assistant Statewide
Prosecutor Florida Bar Number
1018008
Office of Statewide Prosecution
3507 E. Frontage Road, Suite 350,
Tampa, FL 33607

STATE OF FLORIDA
COUNTY OF
HILLSBOROUGH

Before me, the undersigned authority, personally appeared, Patrick Gilday, Senior Assistant Statewide Prosecutor, who, first being duly sworn, say that the allegations as set forth in the foregoing Information is based upon facts that have been sworn to as true, and which, if true, would constitute the offenses therein charged, that the prosecution is instituted in good faith, and certifies that he has received testimony under oath from the material witness or witnesses for the offenses.

Sworn to (or affirmed) and subscribed before me, **by means of□physical presence or online notarization,** this 16TH day of October, 2026, by Patrick Gilday, who is personally known to me.

VICTOR D. ZELAYA
Commission # HH 701898
Expires July 23, 2029

Notary Public - signature
NAME

Notary Public- printed name

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