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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

MUHAMED DIEYE (01)
a/k/a MJ
a/k/a JayJay
a/k/a Medici
a/k/a Lambomotion Tony
a/k/a Adam Fedler
a/k/a Gabriel Colon
a/k/a Sebastian King
a/k/a James Stovall
MAURICE RASHAD MCDUFFIE (02)
a/k/a Heavvvy Motion
SAAD NASHAT BOTROS (03)
a/k/a Felix Saucedo
a/k/a Wesley Swipes
a/k/a Wesley Swipes II
SAMMED KWEKU OKYNE (04)
a/k/a OKC
a/k/a Paris Jawn
RENALDO SANTEZ GAINES (05)
a/k/a BlackMigo
a/k/a OsamaCapone
a/k/a OsamaBin57
ALPHONSO BRNDON SEKE-HORTON JR. (06)
a/k/a The Wizard 302
TERRY LEON DANIELS JR. (07)
a/k/a onedayrealsoon
a/k/a Teazy Daniels
TERRENCE DUDLEY (08)
a/k/a Willy Watkins
a/k/a Brian Faceman
JAMEL ALLEN SMALL (09)
a/k/a Paypawerk
KEMAR FITZROY NEEDHAM (10)
a/k/a Swap King Fx

NO.

3-26CR-548-B

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a/k/a kingzmanfx
COLLIN SLEASMAN (11)
a/k/a Mrgetmoney1k Swindle man
KEVIN BRANDON FLORES CAZARES (12)
a/k/a John First B
a/k/a First B (Call)
DYLON AMARI RUBY (13)
a/k/a slimeyluhdude
a/k/a AT&T
COURTNEY JANE SUTTON (14)

SEALED INDICTMENT

The Grand Jury Charges:

At all times material to this indictment:

Summary of the Conspiracy and Scheme to Defraud

1. From at least in or about July 2023 through in or about November 2024, in the Dallas Division of the Northern District of Texas and elsewhere, defendants **Muhamed Dieye**, **Maurice Rashad McDuffie**, **Saad Nashat Botros**, **Sammed Kweku Okyne**, **Renaldo Santez Gaines**, **Alphonso Brndon Seke-Horton**, **Terry Leon Daniels Jr.**, **Terence Dudley**, **Jamel Allen Small**, **Kemar Fitzroy Needham**, **Collin Sleasman**, **Kevin Brandon Flores Cazares**, **Dylan Amari Ruby**, and **Courtney Jane Sutton**, and co-conspirator Eldrige Keen Massington II (charged elsewhere), along with others known and unknown to the Grand Jury, engaged in a nationwide bank account takeover conspiracy.

2. Defendants selected individual victims and located their bank accounts based largely, though not solely, on data contained in a spreadsheet known as "the Morris

Spreadsheet," which **Dieye** personally possessed. The Morris Spreadsheet contained the personally identifying information ("PII") of nearly 3,000 individuals. More specifically, the Morris Spreadsheet included: (1) victims' names, dates of birth, social security numbers, cell phone numbers, and home addresses; (2) each victim's business address, name, type, employer identification number ("EIN"), date of establishment, phone number, email address, and monthly revenue totals; and (3) a link to a Google drive containing, among other things, multiple bank statements and other documents for the owner and his or her business. According to the monthly revenue totals documented in the Morris Spreadsheet, the victims held over $373,000,000 across their bank accounts.

3. After selecting their individual victims, defendants and their coconspirators ordered and/or generated counterfeit identification documents ("counterfeit IDs"), collated additional PII concerning the individual victims, and coordinated each "play"—defendants' term for an individual instance of fraud—through Telegram. Telegram is an encrypted, cloud-based messaging application that features self-destructing messages, user anonymity through Telegram-generated usernames and "phone numbers," and minimal content moderation. Defendants and their coconspirators communicated primarily through Telegram's direct and group messaging functions. Unless otherwise indicated, any reference to "messages," "messaging," or a "message" in this indictment is a reference to a communication via Telegram.

4. Defendants and coconspirators then enlisted imposters—known as "Scotties"—to assume the individual victims' identities and open new accounts under their identities and/or transfer funds from the victims' accounts.

5. Defendants and coconspirators also leveraged insider banking and telecommunication employees—known as "Innys"—including some of the defendants, to bypass corporate safety measures and enable defendants' access to individual victims' accounts.

6. As the scheme grew, defendants and coconspirators also selected and targeted high-net-worth victims beyond the Morris Spreadsheet.

7. Using this infrastructure, defendants and their coconspirators attempted to and did withdraw or transfer funds from individual victims' accounts at financial institutions and financial services companies.

8. Defendants and coconspirators used the identities of at least 75 individual victims—from the Morris Spreadsheet and beyond—whose financial accounts collectively held at least $11,000,000.

Parties

Defendants

9. **Muhamed Dieye** resided in Dallas, Texas. **Dieye** used the aliases "MJ," "JayJay," "Medici," "Lambomotion Tony," and the synthetic identities "Adam Fedler," "Gabriel Colon," "Sebastian King," and "James Stovall," among others, during the

scheme. **Dieye** was the lead orchestrator and facilitator of the scheme and possessed the Morris Spreadsheet.

10. **Maurice Rashad McDuffie** resided in North Carolina. **McDuffie** used the alias "Heavvvy Motion" during the scheme. **McDuffie** was an orchestrator and facilitator of the scheme.

11. **Saad Nashat Botros** resided in Georgia. **Botros** used the aliases "Felix Saucedo," "Wesley Swipes," and "Wesley Swipes II" during the scheme. **Botros** was an orchestrator and facilitator of the scheme.

12. **Sammed Kweku Okyne** resided in Pennsylvania. **Okyne** used the aliases "OKC" and "Paris Jawn" during the scheme. **Okyne** was an orchestrator and facilitator of the scheme.

13. **Renaldo Santez Gaines** resided in Maryland. **Gaines** used the aliases "BlackMigo," "OsamaCapone," and "OsamaBin57" during the scheme. **Gaines** was an orchestrator and facilitator of the scheme.

14. **Alphonso Brndon Seke-Horton** resided in Dallas. **Seke-Horton** used the alias "The Wizard 302" during the scheme. **Seke-Horton** was an orchestrator and facilitator of the scheme.

15. **Terry Leon Daniels Jr.** resided in Dallas. **Daniels** used the aliases "onedayrealsoon" and "Teazy Daniels" during the scheme. **Daniels** was an orchestrator and facilitator of the scheme.

16. **Terence Dudley** resided in Florida. **Dudley** used the aliases "Willy Watkins" and "Brian Faceman" during the scheme. **Dudley** was a counterfeit document vendor during the scheme.

17. **Jamel Allen Small** resided in Georgia. **Small** used the alias "Paypawerk" during the scheme. **Small** was a counterfeit document vendor during the scheme.

18. **Kemar Fitzroy Needham** resided in Massachusetts. **Needham** used the aliases "Swap king Fx" and "kingzmanfx" during the scheme. **Needham** was a telecommunication insider at AT&T during the scheme.

19. **Collin Sleasman** resided in South Carolina. **Sleasman** used the alias "Mrgetmoney1k Swindle man" during the scheme. **Sleasman** was a counterfeit document vendor during the scheme.

20. **Kevin Brandon Flores Cazares** resided in California. **Flores Cazares** used the aliases "John First B" and "First B (Call)" during the scheme. **Flores Cazares** was a financial institution insider at First Bank during the scheme.

21. **Dylan Amari Ruby** resided in Missouri. Ruby used the aliases "slimeyluhdue" and "AT&T" during the scheme. **Ruby** was a telecommunication insider at AT&T during the scheme.

22. **Courtney Jane Sutton** resided in South Carolina in or around the relevant period. **McDuffie** was **Sutton's** handler. **Sutton** was a financial institution insider at Bank of America during the scheme.

Financial Institutions and Companies

23. JPMorgan Chase Bank, N.A. ("Chase Bank"), Woodforest National Bank, Truist Bank, First Bank, and Bank of America, N.A. ("Bank of America") were financial institutions within the meaning of 18 U.S.C. § 20 whose accounts were then insured by the Federal Deposit Insurance Corporation ("FDIC").

24. Charles Schwab & Co., Inc. ("Charles Schwab") was a financial services company that provided brokerage, banking, and financial advisory services.

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Count One
Conspiracy to Commit Wire Fraud and Bank Fraud
(Violation of 18 U.S.C. § 1349 (18 U.S.C. §§ 1343 and 1344(2)))

25. Paragraphs 1–24 of this indictment are realleged and incorporated by reference as though fully set forth herein.

26. From in or about July 2023 through in or about November 2024, in the Dallas Division of the Northern District of Texas and elsewhere, defendants

MUHAMED DIEYE
MAURICE RASHAD MCDUFFIE
SAAD NASHAT BOTROS
SAMMED KWEKU OKYNE
RENALDO SANTEZ GAINES
ALPHONSO BRNDON SEKE-HORTON
TERRY LEON DANIELS JR.
TERENCE DUDLEY
JAMEL ALLEN SMALL
KEMAR FITZROY NEEDHAM
COLLIN SLEASMAN
KEVIN BRANDON FLORES CAZARES
DYLAN AMARI RUBY
COURTNEY JANE SUTTON

along with others, known and unknown, including co-conspirator Eldridge Keen Massington II, did knowingly and intentionally conspire, combine, and agree to commit wire fraud, in violation of 18 U.S.C. § 1343, and bank fraud, in violation of 18 U.S.C. § 1344(2).

Purpose of the Conspiracy

27. It was the general purpose of the conspiracy for defendants and their co-conspirators to enrich themselves by fraudulently assuming the identities of individual

victims and withdrawing or transferring funds belonging to those individual victims from federally insured financial institutions and financial services companies.

Manner and Means of the Conspiracy

28. The manner and means by which the defendants and their coconspirators sought to accomplish the purpose of the conspiracy and scheme include, among other things:

a. Defendants and their coconspirators utilized a spreadsheet—the Morris Spreadsheet—which contained the personally identifying information of more than 3,000 individuals, to identify victims, select bank accounts to take over, and plan fraudulent bank account takeover plays across multiple financial institutions and financial services companies. Among the individual victims listed in the Morris Spreadsheet were E.D., R.M., J.G., C.H., M.D., S.F., B.H., C.C., S.G., P.R.S., and S.M.J.

b. As defendants and their coconspirators impersonated victims from the Morris Spreadsheet, they also selected and targeted high-net-worth victims beyond the Morris Spreadsheet, including, among others, L.E.

c. Defendants and their coconspirators obtained, generated, and trafficked in counterfeit IDs—including drivers' licenses, state identification cards, passports, credit cards, and social security cards—by ordering them from Telegram-based document vendors, paying in cryptocurrency or through

digital payment applications, and shipping the counterfeit IDs across state lines for use by imposters, or Scotties, acting in victims' names.

d. Defendants and their coconspirators compiled additional sensitive personal and financial data for targeted victims by purchasing credit reports, background reports, and other PII from Telegram data vendors. Defendants utilized this additional information to impersonate victims, satisfy bank authentication procedures, open new accounts, add fraudulent authorized signatories, and initiate transfers, withdrawals, and other financial transactions.

e. Defendants and their coconspirators coordinated the execution of each bank account takeover play using Telegram direct and group chats, voice messages, deleted messages, spreadsheets, and real-time communications to direct Scotties, arrange counterfeit ID drops, instruct financial and telecommunication "Innys," and time fraudulent withdrawals, transfers, and other financial transactions.

f. Defendants and their coconspirators recruited and deployed "Scotties" to enter bank branches, present counterfeit identification documents, answer security questions, and/or conduct fraudulent withdrawals, transfers, or other financial transactions while defendants and coconspirators remotely coached the Scotties, monitored their interactions, and directed their responses.

g. Defendants and their conspirators leveraged corrupt Innys at financial institutions and telecommunications carriers to bypass multifactor authentication, override fraud controls, perform unauthorized account access, view victim bank account funds, process wires or cashier's checks without proper oversight, and manipulate customer telephone records to facilitate account takeovers.

h. Defendants and their conspirators manipulated victims' phone lines by spoofing numbers, swapping SIMs, and intercepting one-time security codes, using telecom insiders to gain access to the verification credentials necessary to reset online banking profiles, respond to fraud alerts, and authorize transfers.

i. Defendants and their conspirators opened fraudulent financial accounts in victims' names and added co-conspirators as signatories to existing victim accounts, using those accounts as vehicles to make fraudulent withdrawals, transfers, and other financial transactions.

j. Defendants and their coconspirators traveled across state lines—including to and from Texas, Georgia, South Carolina, Missouri, and New York—to execute in-person financial transactions, impersonate victims, engage bank insiders, retrieve counterfeit IDs, and complete high-value withdrawals, transfers, and other financial transactions.

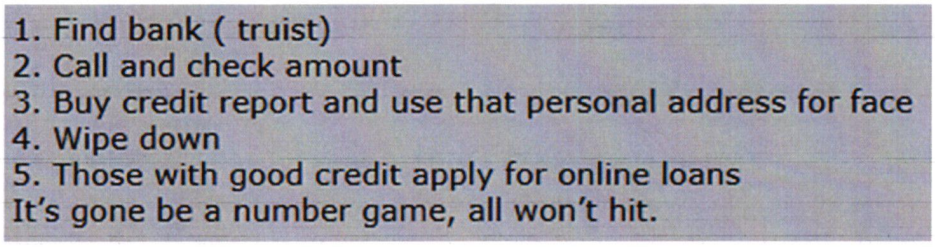
Acts in Furtherance of the Conspiracy

29. In furtherance of the conspiracy and to achieve its objects and purpose, the following acts, among others, were committed in the Northern District of Texas, Dallas Division, and elsewhere.

The E.D. Play

30. On or about July 28, 2023, **Dieye**, Massington, and **Seke-Horton** met at a Sheraton Hotel in Dallas, Texas, to develop a gameplan for the bank account takeover scheme.

31. On or about July 30, 2023, **Dieye** messaged Massington and **Seke-Horton** and instructed them to "hit the small balance first . . . Then save the big ones for wire." **Seke-Horton** responded:



32. On or about August 1, 2023, **Dieye** messaged **Dudley** to place a bulk order for ten "faces"—a slang term for counterfeit IDs. **Dieye** informed **Dudley**: "Need rasin n uv all bank work so I need it to be on point gang." **Dieye** reminded **Dudley** again the next day: "Need them to scan and rasin for light this is all bank shyt gang."

33. On or about August 20, 2023, **Dieye** ordered ten more faces from **Dudley** via Telegram. **Dieye** provided **Dudley** with the name, date of birth, address, social

security number, and driver's license number for E.D. **Dieye** requested that **Dudley** ship the faces to Massington's address in Mesquite, Texas.

34. On or about August 22, 2023, Massington deposited a $9,000 PNC Bank check into E.D.'s Truist business account. The next day, Massington withdrew $8,000 from the account.

The R.M. Play

35. On or about August 20, 2023, **Dieye** ordered ten more faces from **Dudley** via Telegram. **Dieye** provided **Dudley** with the name, date of birth, address, social security number, and driver's license number for R.M. **Dieye** requested that **Dudley** ship the faces to Massington's address in Mesquite.

36. On or about August 25, 2023, **Dieye** messaged Massington and **Seke-Horton** and provided them with R.M.'s name, address, date of birth, social security number, driver's license, business information, and, among other things, amount in his business account. Massington responded: "On our way to wood forest." Massington then opened a new Woodforest National Bank account ("WF-3349") under R.M.'s identity. Massington made an initial deposit into WF-3349 of $9,175 via a Truist Bank check on behalf of R.M.'s business.

37. On or about August 27, 2023, Massington paid **Dieye** $4,900 and **Seke-Horton** $4,300 via peer-to-peer payment applications.

The J.G. and C.H. Play

38. On or about August 2, 2023, **Dieye** messaged **Dudley** and requested "Eyes (B&B)"—a slang term synonymous with faces—for J.G. and C.H. **Dieye** provided **Dudley** with both individual victims' dates of birth, addresses, and social security numbers. **Dieye** reminded **Dudley**: "Need them to scan and rasin for light this is all bank shyt gang."

39. On or about August 2, 2023, **Dieye** messaged Massington and **Seke-Horton** and requested that they compile J.G.'s and C.H.'s PII in a credit report format so that **Dieye** could order J.G.'s and C.H.'s credit reports and counterfeit IDs from a vendor on Telegram. **Seke-Horton** responded: "My 5 five I check all credit was terrible smh about to check el [*i.e.*, Massington's] 5 now."

40. On or about August 7, 2023, **Dieye** messaged an unindicted coconspirator ("UC-1") to request a driver's license number for J.G. **Dieye** then messaged Massington and **Seke-Horton** and provided them with J.G.'s driver's license number.

41. On or about August 14, 2023, **Seke-Horton** messaged **Dieye** and Massington, asking: "Which ones y'all trynna clear today?" **Seke-Horton** provided **Dieye** and Massington with J.G.'s and C.H.'s PII and bank account balances.

42. On or about September 11, 2023, Massington attempted to apply for a line of credit of $163,614 to purchase a 2021 Mercedes using J.G.'s identity. Massington listed C.H. as a cosigner.

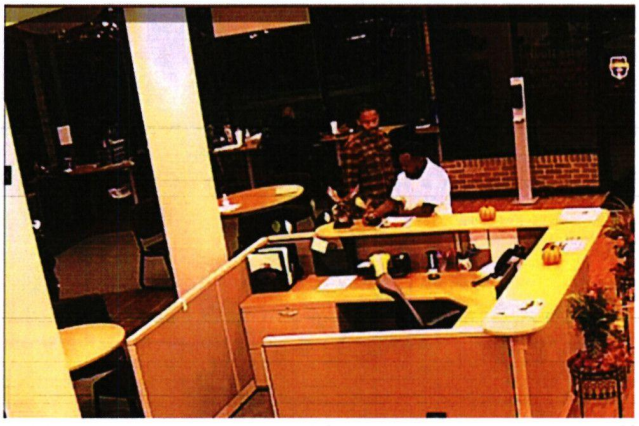
The M.D. Play

43. On or about August 7, 2023, **Dieye** messaged UC-1 to request a driver's license number for M.D. **Dieye** then messaged Massington and **Seke-Horton** and provided them with M.D.'s driver's license number.

44. On or about October 25, 2023, Massington withdrew $5,000 from M.D.'s D.G., LLC, business account at Truist Bank ending in 3212.

45. On or about November 15, 2023, **Daniels** and Massington attempted to obtain financing of $73,835 to purchase a vehicle in Atlanta, Georgia, using M.D.'s identity.





The S.F. Play

46. On or about August 7, 2023, **Dieye** messaged UC-1 to request S.F.'s driver's license number. **Dieye** messaged Massington and **Seke-Horton** later and provided them with S.F.'s driver's license number.

47. On or about August 8, 2023, **Dieye** messaged **Dudley**, provided him with S.F.'s name, date of birth, address, and social security number, and ordered a counterfeit ID for S.F.

48. On or about August 10, 2023, **Dudley** shipped **Dieye's** order.

49. On or about August 14, 2023, **Seke-Horton** messaged **Dieye** and Massington, asking: "Which ones y'all trynna clear today?" **Seke-Horton** provided **Dieye** and Massington with S.F.'s PII and bank account balance.

50. On or about August 15, 2023, **Dieye** messaged Massington and **Seke-Horton** and provided them with S.F.'s PII. **Dieye** then stated: "We gotta wire 100k out . . . We have to [sic] much info not to."

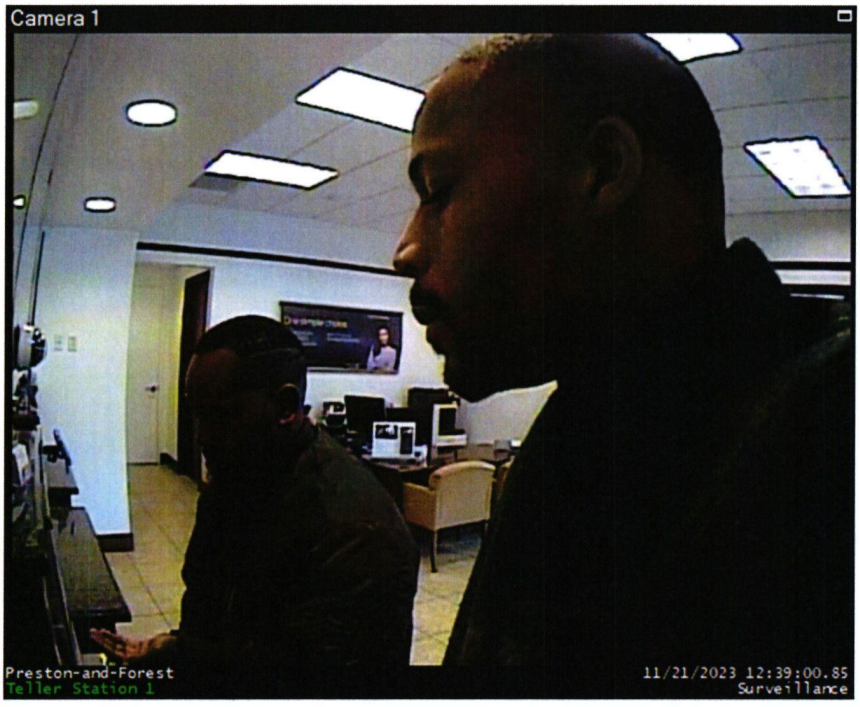
51. On or around November 14, 2023, Massington and **Daniels** traveled to Suwanee, Georgia to add **Daniels**, posing as "D.F."— S.F.'s brother—as an authorized signatory to S.F.'s Truist Bank accounts ending in 1634 and 1531.

52. On or about November 20, 2023, Massington and **Daniels** added **Daniels**, posing as D.F., to S.F.'s Truist Bank account ending in 1493 at a Truist Bank branch in Garland, Texas.

53. On or about November 21, 2023, **Daniels** withdrew $1,200 from S.F.'s Truist Bank account ending in 1493 at a Truist Bank branch in Mesquite.

54. On or about November 21, 2023, **Daniels** withdrew $18,600 from S.F.'s Truist Bank account ending in 1493 at a Truist Bank branch in Rockwall, Texas.

55. On or about November 21, 2023, **Daniels** withdrew $5,300 from S.F.'s Truist Bank account ending in 1493 at a Truist Bank branch in Dallas.



The B.H. Play

56. On or about January 11, 2024, **Dieye** messaged **Small** and ordered a counterfeit ID with B.H.'s PII, including B.H.'s name, address, date of birth, driver's license number, and social security number.

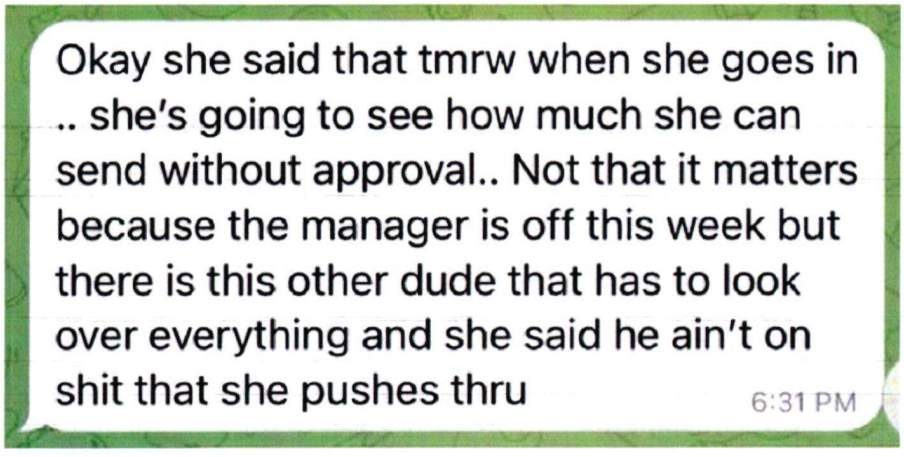
57. On or about January 12, 2024, **Small** shipped the counterfeit B.H. ID to the home address of **Dieye**'s relative.

58. On or about March 28, 2024, **Dieye** messaged **Okyne** and asked if he could join the B.H. play in Rock Hill, South Carolina. **Okyne** agreed to join the play.

59. On or about March 29, 2024, **Dieye** messaged **Okyne** to discuss using an unindicted co-conspirator ("UC-2") as their Scottie on the play. **Okyne** suggested that they pay UC-2 $450 to serve as their Scottie.

60. Later that day, **Dieye** messaged **Okyne**: "Banker waiting." **Dieye** instructed **Okyne** to prepare UC-2 for the play, stating: "Have him read things out loud when he gets in car . . . Text him like you're the banker." Once UC-2 entered a Bank of America branch in Rock Hill, **Dieye** instructed **Okyne**: "DONT let them leave till wire completed from parking lot." **Dieye** messaged **Okyne** later that day: "95,000 woulda shot thru . . . We went too high bro."

61. On or about April 1, 2024, **McDuffie** messaged **Dieye**: "BOA A GO !!!" **Dieye** asked what the Bank of America Inny's "limit" was, referring to the wire transfer authority of **Sutton**, a Bank of America employee. **McDuffie** responded:

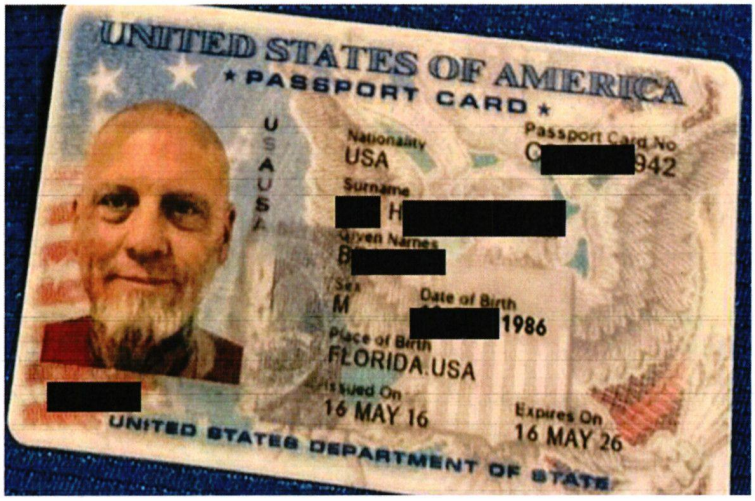


62. That same day, **Dieye** messaged **Okyne** and provided him with a screenshot of his messages with **McDuffie** concerning **Sutton's** wire authority. **Dieye** and **Okyne** then discussed getting "security questions ready" for the play. **Dieye** also sent **Okyne** B.H.'s PII along with **Sleasman's** Cash App handle.

63. On or about April 2, 2024, **McDuffie** messaged **Dieye** to inform him that **Sutton** was instructing them to have an ID and social security card for the play. **Dieye**

responded: "Salaam bro mashallah [Allah has willed it] didn't even know but yeah we got all that then." **Dieye** informed **McDuffie** that his AT&T "Inny"—**Needham**—was prepared to spoof B.H.'s phone line.

64. On or about April 3, 2024, **Dieye** messaged **Okyne** and provided him with a screenshot of his messages with **Sleasman**. In those messages, **Sleasman** informed **Dieye** that he required a drop address for counterfeit B.H. IDs because he would not be "handing 2 handing anything." That same day, **McDuffie** retrieved the IDs from the address drop that **Sleasman** provided, one of which included UC-2's face with B.H.'s PII.



After retrieving the counterfeit B.H. IDs, **McDuffie** messaged **Dieye** that UC-2 "can go in [to the Bank of America branch] and ask for Courtney [**Sutton**] she has someone in her office but she said she can get him."

65. That same day, **Dieye** messaged **Needham** and provided **Needham** with B.H.'s PII. **Dieye** asked **Needham** to provide him with a 4-digit AT&T verification code.

Needham responded: "Sent . . . Let him accept . . . Let me kno when to refresh . . . Just let me kno when he accept so I can refresh."

The S.G. and P.R.S. Play

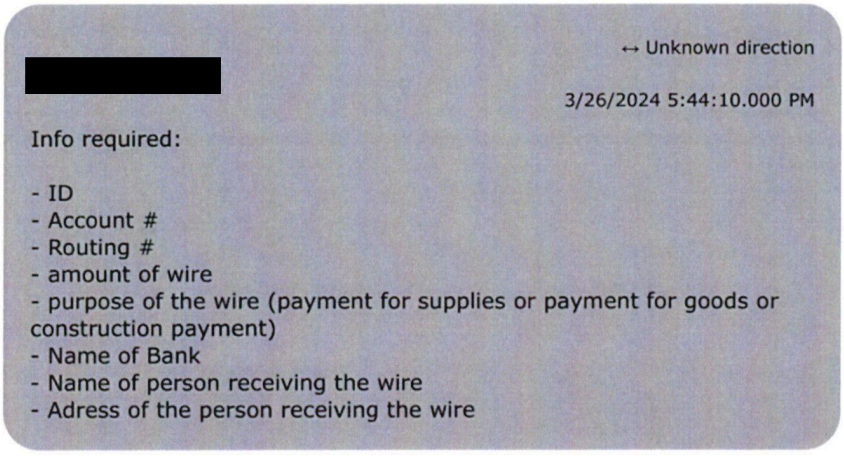
66. On or about March 24, 2024, an unindicted co-conspirator ("UC-3") messaged **Dieye** on Telegram, stating: "Wassup with first bank work bro let's get active . . . We got first bank inny and us bank inny." **Dieye** responded: "Back to work lol[.]"

67. On or about March 25, 2024, **Dieye**, **Flores Cazares**, and UC-3 created a group message in Telegram where they discussed the S.G. and P.R.S. play. **Flores Cazares**, a First Bank employee, messaged **Dieye** and UC-3: "I can cook a wire under 100k or a cashier's check 25k and under. . . . I'll ask minimal questions just to follow policy and procedures but nothing out of hand, basic shit."

68. On or about March 25, 2024, **Dieye** messaged a Telegram bot and requested "2 bg's"—a slang term for background reports (*e.g.*, credit reports and bank accounts)—for S.G. and P.R.S. **Dieye** provided the bot with the names, social security numbers, and addresses for S.G. and P.R.S, as well as the date of birth for S.G.

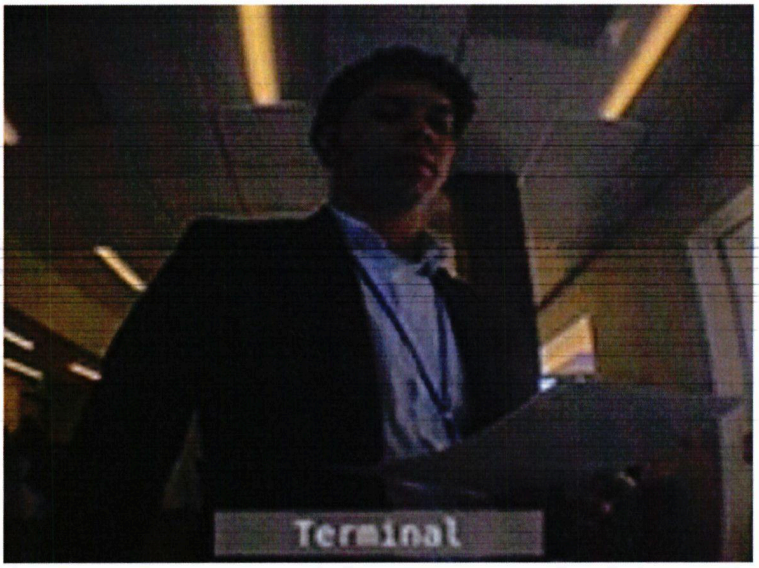
69. On or about March 26, 2024, **Dieye** messaged **Flores Cazares** and UC-3 and provided them with P.R.S.'s PII. **Flores Cazares** confirmed that he could see P.R.S.'s account, but he then sent **Dieye** and UC-3 a screenshot of P.R.S.'s account, stating: "It was a business credit card not an account and it's closed." **Dieye** then provided **Flores Cazares** with S.G.'s PII, to which **Flores Cazares** responded: "We got

one boys." **Flores Cazares** provided **Dieye** and UC-3 with the information that the Scottie should be prepared to share once inside the branch, stating:



70. On or about April 2, 2024, **Dieye** messaged **Flores Cazares** and UC-3: "We wiring gang." **Flores Cazares** responded: "Just clocked in but alright today might be busy so it'll be good."

71. On or about April 2, 2024, **Flores Cazares** caused First Bank to issue two cashiers' checks for $7,600 and $5,400 from S.G.'s business account ending in 7118. The transaction was recorded:

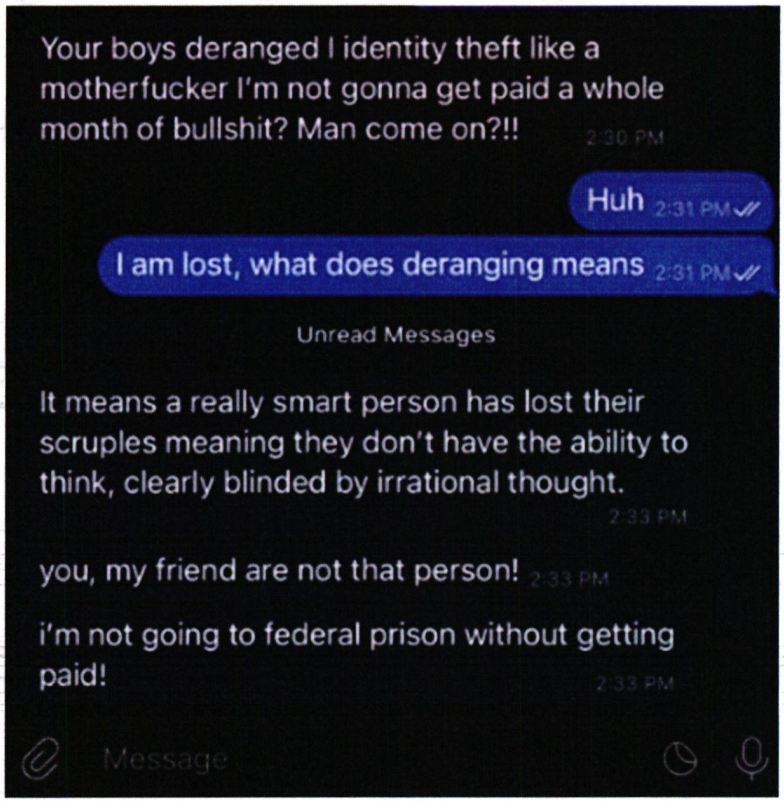


The C.C. Play

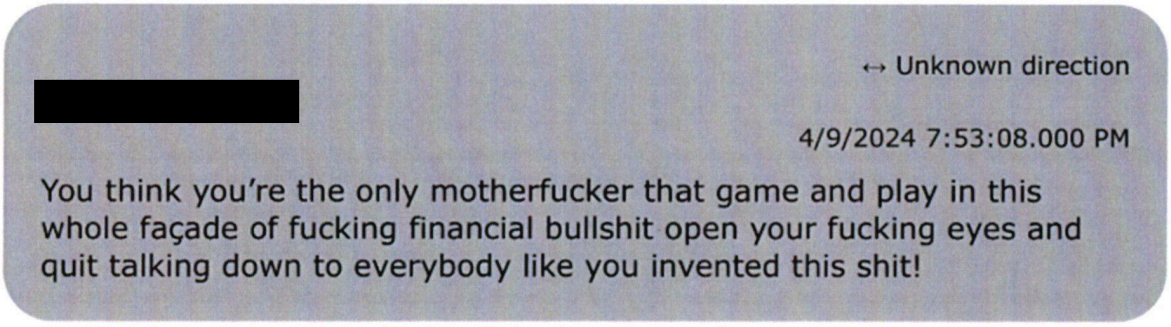
72. On or about April 3, 2024, **Dieye** messaged **Okyne** and provided him with C.C.'s PII and Bank of America holdings.

73. On or about April 4, 2024, **Okyne** messaged **Dieye** that UC-2 agreed to help with the play.

74. On or about April 9, 2024, **Okyne** messaged **Dieye** that UC-2 was complaining about being abandoned during the play. **Okyne** sent **Dieye** a screenshot of a conversation wherein UC-2 bragged about identity theft and stated that he would "not go[] to "federal prison without getting paid!"



Dieye responded:



75. On April 22, 2024, **Dieye** messaged **Ruby**—then an AT&T employee who functioned as an AT&T Inny—and provided him with C.C.'s PII and International Mobile Equipment Identity ("IMEI") to **Ruby**. **Ruby** responded: "we're green after the social. My guy is ready to come in." In a separate Telegram group chat, **Dieye** sent **Ruby** a barcode to review C.C.'s account. **Ruby** reported: "No notes. Account is clean." He then asked **Dieye**: "you got all the fraud answers if needed?" **Dieye** then provided **Ruby** with D.C.'s (C.C.'s brother) address, SSN, and DOB and stated: "Don't take line yet."

76. That same day, on April 22, 2024, **Sutton**, using her Bank of America credentials, accessed C.C.'s Bank of America account five times.

77. On April 23, 2024, **Dieye** messaged **McDuffie**: "Ok let's get active." **McDuffie** responded: "Got my man's meeting with his other boa inny about attachments, the original Boa inny said that it looks like a planned and orchestrated scam. So she [*i.e.*, **Sutton**] isn't comfortable doing it that way. But she's good with wire, cashiers checks."

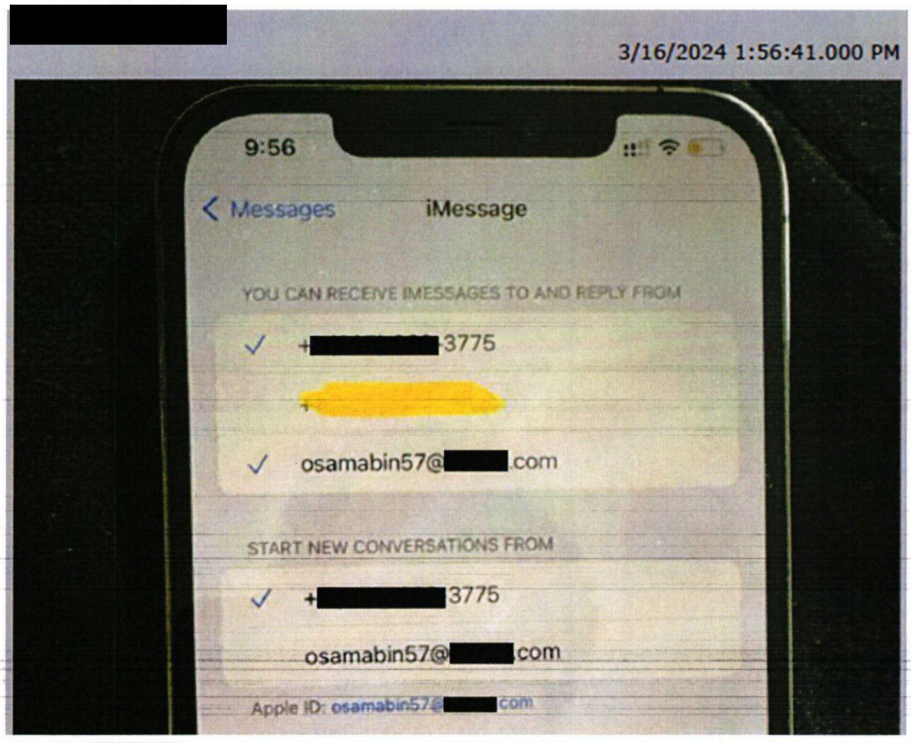
The L.E. Play

78. On or about March 15, 2024, **Dieye** messaged **Gaines** and attached a since-deleted photograph, stating: "I swapped this line this morning I spoof victim look what it

showing." **Gaines** then sent **Dieye** several screenshots of "Truist Alerts" providing one-time security codes.

79. On or about March 15, 2024, **Dieye** caused a $275,000 wire transfer from L.E.'s Truist Bank account ending in 3332 to a luxury jewelry store. **Dieye** also attempted to cause an additional $225,000 wire from L.E.'s Truist Bank account ending in 3332 to a Canadian wristwatch store.

80. On or about March 16, 2024, **Gaines** messaged **Dieye** and sent a picture of his phone with L.E.'s phone number listed as his phone number. **Gaines** then sent a screenshot showing that he linked L.E.'s phone number to his Osamabin57 email address:

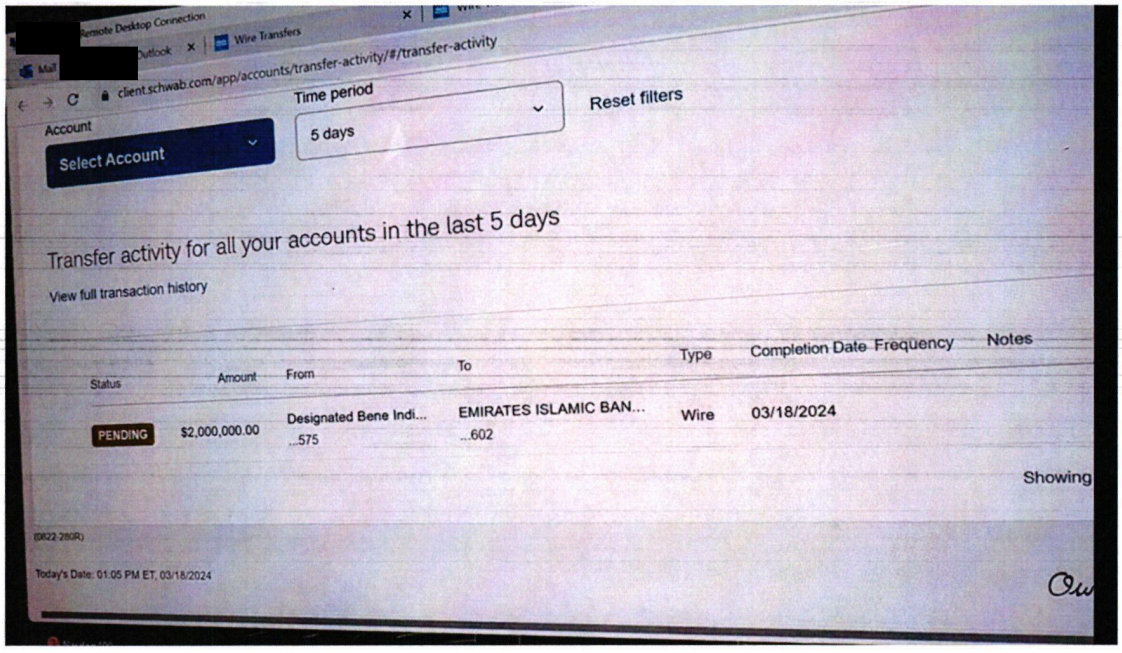


After **Dieye** requested the text message history for L.E.'s phone number, **Gaines** sent a screenshot that included the Truist Bank one-time alerts from on or about March 15, 2024.

81. On or about March 17, 2024, **Dieye** messaged **Gaines** and instructed him to "reply to [a Charles Schwab] fraud alert . . . put yes to all of them." **Gaines** informed **Dieye** that he complied and provided **Dieye** with a Charles Schwab security code.

82. On or about March 17, 2024, **Okyne** booked **Dieye** a flight from Dallas to Newark, New Jersey, and informed **Dieye** that he would pick him up at the airport for the play. **Dieye** also separately messaged an unindicted co-conspirator ("UC-4") to request L.E.'s "bg." **Dieye** provided UC-4 with L.E.'s name, address, and date of birth.

83. On or about March 18, 2024, **Dieye**, **Okyne**, and **Gaines** met in New York. **Dieye** attempted to cause a $2,000,000 wire from L.E.'s Charles Schwab account ending in 5575 to Emirates Islamic Bank. In attempting to cause the wire to clear, **Dieye**, **Okyne**, and **Gaines** called Charles Schwab, impersonated L.E., and asked Charles Schwab to approve the wire. **Dieye** also utilized a VPN when placing the transaction to mask his location and IP address as originating from Dallas during the play.



The S.M.J. Play

84. On or about July 24, 2023, **Dieye** messaged an unindicted co-conspirator ("UC-5") and provided her with the PII for ten individual victims. **Dieye** ordered 10 faces from UC-5 and instructed her: "All this work is bank work they gonna scan it gang." The next day, **Dieye** provided UC-5 with S.M.J.'s name, date of birth, address, and social security number, and requested that UC-5 ship a counterfeit ID to Dallas.

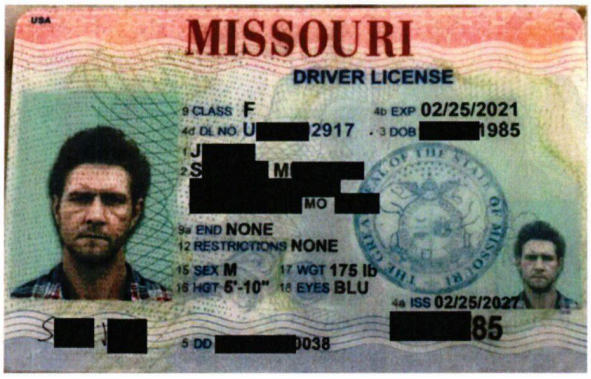
85. On or about May 1, 2024, **Dieye** messaged **Ruby** and provided him with S.M.J.'s PII. **Ruby** informed **Dieye** that he searched for S.M.J. in AT&T's records and did not find anything.

86. On or about May 1, 2024, **Dieye** messaged **Botros**: "100% total-20%(Inny) - 15%(mans)-15% (spammer) = 50% left . . . VZ or ATT No Asians Male . . . EZ Money." **Dieye** then provided **Botros** with S.M.J.'s number and sent him a screenshot of his messages with **Ruby**, wherein **Ruby** notified **Dieye** that S.M.J. is not an AT&T customer.

87. On or about May 2, 2024, **Botros** messaged **Small** and provided him with S.M.J.'s PII. He then ordered two counterfeit S.M.J. IDs.

88. On or about May 7, 2024, **Small** delivered the two counterfeit S.M.J. IDs—which featured two Scotties—to **Botros**.





89. On or about May 6, 2024, **Dieye** messaged **Gaines**: "need Verizon inny bro." The next day, **Gaines** responded: One second bro."

90. On or about May 13, 2024, **Botros** messaged **Dieye** and provided him with information concerning S.M.J.'s age, relatives, addresses, phone numbers, email, credit cards, business checking and savings accounts, and personal checking and savings accounts. In turn, **Dieye** provided **Botros** with a script for calling Bank of America.

[redacted]

I'm doing an Internal transfer
From my personal account to my online currency exchange platform

What branch did you open your account?

Age:39

What's is this wire for? Investing in my currency exchange platform 60% of millionaires in invest in cryptocurrency

Signature

Mmn? [redacted]

How many accounts do you have with us? Omg so many probably 7-9 accounts

Debit card ??? Don't carry that card I normally jsut use my Amex

Old wire (complain about how long it took)
Hey every time I send a wire I have to call in or come back in to verify my self so I would like a manager to come verify please.

91. On or about May 15, 2024, **Dieye** messaged **Botros** to inform him that he was traveling from Dallas to St. Louis, Missouri for the S.M.J. play. **Botros** confirmed he was also in St. Louis and would pick **Dieye** up from the airport.

92. On or about May 16, 2024, **Gaines** traveled from Washington, D.C., to St. Louis to meet **Dieye** and **Botros** for the S.M.J. play.

93. On May 20, 2024, **Sutton**, using her Bank of America credentials, accessed S.M.J.'s account with Bank of America three times.

All in violation of 18 U.S.C. § 1349 (18 U.S.C. §§ 1343 and 1344(2)).

Counts Two through Eight
Bank Fraud
(Violation of 18 U.S.C. § 1344(2))

94. Paragraphs 1–24 and 28–93 of this indictment are realleged and incorporated by reference as though fully set forth herein.

95. From in or about July 2023 through in or about November 2024, in the Dallas Division of the Northern District of Texas and elsewhere, defendants, as identified in the chart below, knowingly and with intent to defraud, did execute a scheme and artifice to obtain moneys, funds, credits, and other property owned by and under the custody and control of financial institutions, as identified in the chart below, by means of materially false and fraudulent pretenses, representations, and promises, each transaction constituting a separate count:

Count	Defendants	Date (On or About)	Execution
2	**Dieye** **Seke-Horton** **Dudley**	August 22, 2023	Deposit of a $9,000 PNC Bank check into E.D.'s Truist business account ending in 3486.
3	**Dieye** **Seke-Horton** **Dudley** **Daniels**	October 25, 2023	Withdrawal of $5,000 from M.D.'s Truist Bank business account ending in 3212.
4	**Dieye** **Seke-Horton** **Dudley** **Daniels**	November 21, 2023	Withdrawal of $1,200 from S.F.'s Truist Bank account ending in 1493.
5	**Dieye** **Seke-Horton** **Dudley** **Daniels**	November 21, 2023	Withdrawal of $18,600 from S.F.'s Truist Bank account ending in 1493.

6	**Dieye** **Seke-Horton** **Dudley** **Daniels**	November 21, 2023	Withdrawal of $5,300 from S.F.'s Truist Bank account ending in 1493.
7	**Dieye** **Flores Cazares**	April 2, 2024	Issuance of cashier check 1585, in the amount of $7,600, from S.G.'s business account ending in 7118.
8	**Dieye** **Flores Cazares**	April 2, 2024	Issuance of cashier check 1586, in the amount of $5,400, from S.G.'s business account ending in 7118.

All in violation of 18 U.S.C. §§ 1344(2).

[Remainder of page intentionally blank]

Counts Nine through Sixteen
Wire Fraud
(Violation of 18 U.S.C. § 1343)

96. Paragraphs 1–24 and 28–93 of this indictment are realleged and incorporated by reference as though fully set forth herein.

97. From in or about July 2023 through in or about November 2024, in the Dallas Division of the Northern District of Texas and elsewhere, defendants, as identified in the chart below, knowingly and with intent to defraud, did devise, participate in, and execute, a scheme and artifice to defraud financial institutions and financial services companies, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing the scheme and artifice to defraud described above, caused to be transmitted by means of wire communications in interstate and foreign commerce the following writings, signs, signals, pictures, and sounds:

Count	Defendants	Date (On or About)	Description of Wire
9	**Dieye** **Okyne**	March 17, 2024	Telegram communication from **Okyne** to **Dieye** wherein **Okyne** provided **Dieye** with a screenshot of an American Airlines flight reservation for a flight from DFW to EWR.
10	**Dieye** **Gaines**	March 17, 2024	Telegram communication from **Gaines** to **Dieye** wherein **Gaines** provided **Dieye** with a screenshot of one-time Charles Schwab security codes.

11	**Dieye** **Botros**	May 15, 2024	Telegram communication from **Botros** to **Dieye** wherein **Botros** provided **Dieye** with a screenshot of an American Airlines flight from DFW to STL.
12	**Dieye** **McDuffie**	April 1, 2024	Telegram communication from **McDuffie** to **Dieye** wherein **McDuffie** stated: "BOA A GO !!!"
13	**Dieye** **Needham**	April 3, 2024	Telegram communication from **Needham** to **Dieye** wherein **Needham** stated: "Sent . . . Let him accept . . . Let me kno when to refresh . . . Just let me kno when he accept so I can refresh."
14	**Dieye** **Small**	January 10, 2024	Telegram communication from **Small** to **Dieye** wherein **Small** stated: "If it wasnt in Atl it would be a no cause it's past cut off time but since it's where I'm at I can drop them in an Uber tomorrow night and have it dropped off[.]"
15	**Dieye** **Sleasman**	April 3, 2024	Telegram communication from **Sleasman** to **Dieye** wherein **Sleasman** asked: "Will he pick it up cause I'm not handing 2 handing anything[?]"
16	**Dieye** **Ruby**	April 22, 2024	Telegram communication from **Ruby** to **Dieye** wherein **Ruby** stated: "we're green after the social. My guy is ready to come in."

All in violation of 18 U.S.C. § 1343.

Counts Seventeen – Twenty-Two
Aggravated Identity Theft
(Violation of 18 U.S.C. § 1028A)

98. Paragraphs 1–24 and 28–93 of this indictment are realleged and incorporated by reference as though fully set forth herein.

99. On or about the dates listed in the table below, in the Dallas Division of the Northern District of Texas, the defendant, **Muhamed Dieye**, knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, that is, the means of identification identified in the table below, belonging to individuals whose initials are identified in the table below, during and in relation to the enumerated offenses identified in the table below, knowing that the means of identification belonged to another real person.

Count	Defendant	Date (On or About)	Description	Enumerated Offense/Count
17	**Dieye**	August 20, 2023	The name, date of birth, social security number, and driver's license number belonging to an individual whose initials are E.D.	Bank fraud (18 U.S.C. § 1344(2)) Count Two
18	**Dieye**	August 2, 2023	The name, date of birth, and social security number belonging to an individual whose initials are M.D.	Bank fraud (18 U.S.C. § 1344(2)) Count Three
19	**Dieye**	August 2, 2023	The name, date of birth, and social security number belonging to an individual whose initials are S.F.	Bank fraud (18 U.S.C. § 1344(2)) Count Six
20	**Dieye**	January 11, 2024	The name, date of birth, social security number,	Conspiracy to commit wire

			and driver's license number belonging to an individual whose initials are B.H.	fraud and bank fraud 18 U.S.C. § 1349 (18 U.S.C. §§ 1343 and 1344(2)) Count One
21	**Dieye**	March 17, 2024	The name and date of birth belonging to an individual whose initials are L.E.	Wire fraud (18 U.S.C. § 1343) Count Nine
22	**Dieye**	July 24, 2023	The name, date of birth, and social security number belonging to an individual whose initials are S.M.J.	Wire fraud (18 U.S.C. § 1343) Count Eleven

All in violation of 18 U.S.C. § 1028A(a)(1).

[Remainder of page intentionally blank]

Notice of Criminal Forfeiture
(18 U.S.C. § 982(a)(2) and 18 U.S.C. § 1028(b))

100. Paragraphs 1–99 of this indictment are realleged and incorporated by reference as though fully set forth herein.

101. Pursuant to 18 U.S.C. § 982(a)(2)(A), upon conviction of any of the offenses alleged in Counts One through Sixteen, the defendants,

MUHAMED DIEYE
MAURICE RASHAD MCDUFFIE
SAAD NASHAT BOTROS
SAMMED KWEKU OKYNE
RENALDO SANTEZ GAINES
ALPHONSO BRANDON SEKE-HORTON
TERRY LEON DANIELS JR.
TERENCE DUDLEY
JAMEL ALLEN SMALL
KEMAR FITZROY NEEDHAM
COLLIN SLEASMAN
KEVIN BRANDON FLORES CAZARES
DYLAN AMARI RUBY
COURTNEY JANE SUTTON

shall forfeit to the United States of America any property constituting, or derived from, proceeds the defendants obtained directly or indirectly as the result of the offense.

102. Pursuant to 18 U.S.C. § 982(a)(2)(B) and 18 U.S.C. § 1028(b), upon conviction of any of the offenses alleged in Counts Seventeen through Twenty-Two, the defendant, **Muhamed Dieye**, shall forfeit to the United States any property constituting, or derived from, proceeds the defendant obtained directly or indirectly as the result of the offense as well as any personal property used or intended to be used to commit the offense.

103. The above-referenced property subject to forfeiture includes, but is not limited to, a "money judgment" in the amount of U.S. currency constituting the gross proceeds traceable to the offense.

104. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States intends to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

A TRUE BILL:

[redacted]

FOREPERSON

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UNITED STATES ATTORNEY

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Facsimile: (214) 659-8805
Michael.Murtha@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

MUHAMED DIEYE (01)
a/k/a MJ
a/k/a JayJay
a/k/a Medici
a/k/a Lambomotion Tony
a/k/a Adam Fedler
a/k/a Gabriel Colon
a/k/a Sebastian King
a/k/a James Stovall
MAURICE RASHAD MCDUFFIE (02)
a/k/a Heavvvy Motion
SAAD NASHAT BOTROS (03)
a/k/a Felix Saucedo
a/k/a Wesley Swipes
a/k/a Wesley Swipes II
SAMMED KWEKU OKYNE (04)
a/k/a OKC
a/k/a Paris Jawn
RENALDO SANTEZ GAINES (05)
a/k/a BlackMigo
a/k/a OsamaCapone
a/k/a OsamaBin57
ALPHONSO BRNDON SEKE-HORTON JR. (06)
a/k/a The Wizard 302
TERRY LEON DANIELS JR. (07)
a/k/a onedayrealsoon
a/k/a Teazy Daniels
TERRENCE DUDLEY (08)
a/k/a Willy Watkins
a/k/a Brian Faceman
JAMEL ALLEN SMALL (09)
a/k/a Paypawerk
KEMAR FITZROY NEEDHAM (10)
a/k/a Swap King Fx
a/k/a kingzmanfx
COLLIN SLEASMAN (11)
a/k/a Mrgetmoney1k Swindle man

KEVIN BRANDON FLORES CAZARES (12)
a/k/a John First B
a/k/a First B (Call)
DYLON AMARI RUBY (13)
a/k/a slimeyluhdude
a/k/a AT&T
COURTNEY JANE SUTTON (14)

SEALED INDICTMENT

18 U.S.C. § 1349 (18 U.S.C. §§ 1343 and 1344(2))
Conspiracy to Commit Wire Fraud and Bank Fraud
(Count 1)
18 U.S.C. § 1344(2)
Bank Fraud
(Counts 2-8)
18 U.S.C. § 1343
Wire Fraud
(Counts 9-16)
18 U.S.C. § 1028A
Aggravated Identity Theft
(Counts 17-22)
18 U.S.C. § 982(a)(2) and 18 U.S.C. § 1028(b)
Forfeiture Notice

22 Counts

A true bill rendered

[redacted]

DALLAS FOREPERSON

Filed in open court this 26 day of August, 2026.

Warrant to be Issued for Defendants 02-14
Defendant 1 – In Federal Custody as of 7/21/2026

UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 3:26-MJ-769-BW