

RTP:MWG
F. #2021R00179

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

- against -

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF ARREST WARRANTS

ROMEAN BROWN, TYREK CLARKE,
KENNITH DESIR, STEPHAN DORMINVIL, KAI (18 U.S.C. §§ 1028A(a)(1) and 1029(b)(2))
HEYWARD, KEITH JAMES, CHRISTOPHER
JEAN PIERRE, ONEAL MARKS, JAHRIAH No. 22-MJ-169
OLIVIERRE, ROLEEKE SMITH and
CHRISTOPHER TOPEY,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

JAMES WOODS, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Labor, Office of Inspector General, duly appointed according to law and acting as such.

In or about and between March 2020 and October 2021, within the Eastern District of New York and elsewhere, the defendants ROMEAN BROWN, TYREK CLARKE, KENNITH DESIR, STEPHAN DORMINVIL, KAI HEYWARD, KEITH JAMES, CHRISTOPHER JEAN PIERRE, ONEAL MARKS, JAHRIAH OLIVIERRE, ROLEEKE SMITH and CHRISTOPHER TOPEY, together with others, did knowingly and with intent to defraud conspire to use, and effect transactions with, one or more unauthorized access devices issued to one or more other persons, to wit: debit cards and Social Security numbers, in a manner affecting interstate commerce, and by such conduct obtained and

received payments and things of value aggregating \$1,000 or more during any one-year period, contrary to Title 18, United States Code, Sections 1029(a)(2) and 1029(a)(5).

(Title 18, United States Code, Section 1029(b)(2))

In or about and between March 2020 and October 2021, within the Eastern District of New York and elsewhere, the defendants ROMEAN BROWN, TYREK CLARKE, KENNITH DESIR, STEPHAN DORMINVIL, KAI HEYWARD, KEITH JAMES, CHRISTOPHER JEAN PIERRE, ONEAL MARKS, JAHRIAH OLIVIERRE, ROLEEKE SMITH and CHRISTOPHER TOPEY, together with others, during and in relation to the crime charged above, did knowingly and intentionally transfer, possess and use, without lawful authority, one or more means of identification of one or more persons, knowing that the means of identification belonged to other persons.

(Title 18, United States Code, Section 1028A(a)(1))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the United States Department of Labor, Office of Inspector General ("DOL-OIG"), and have been since 2006. As part of my work with the DOL-OIG, I investigate, among other offenses, unemployment insurance fraud and identity theft offenses. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

defendants' criminal history records; and from reports of other law enforcement officers involved in the investigation.

I. The New York State Unemployment System and Pandemic Unemployment Assistance

2. The United States Social Security Act established a federal and state unemployment insurance ("UI") system designed to provide benefits to unemployed people. Each state administers a separate UI program with guidelines established by federal law. The United States Department of Labor exercises general oversight over the UI program. In New York, the New York State Department of Labor ("NYDOL") operates the unemployment system and distributes UI benefits through the New York State Unemployment Insurance Fund ("NYSUIF").

3. On March 13, 2020, the President of the United States declared that the ongoing Coronavirus Disease 2019 ("COVID-19") pandemic was of sufficient severity and magnitude to warrant an emergency declaration for all states, tribes and territories, and the District of Columbia, pursuant to Section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207 (the "Stafford Act").

4. On March 18, 2020, the President of the United States signed the Families First Coronavirus Response Act ("FFCRA") into law. The FFCRA provided additional flexibility for state UI agencies and additional administrative funding to respond to the COVID-19 pandemic.

5. On March 27, 2020, the Coronavirus, Relief, and Economic Security ("CARES") Act was signed into law. It expanded states' ability to provide UI for many workers impacted by COVID-19, including for workers not ordinarily eligible for UI

benefits. The CARES Act created several new programs, including Pandemic Unemployment Assistance (“PUA”) and Federal Pandemic Unemployment Compensation (“FPUC”).

6. PUA provided for up to 39 weeks of benefits to individuals who were self-employed, seeking part-time employment, or who otherwise would not qualify for regular UI or extended benefits under state or federal law or Pandemic Emergency Unemployment Compensation (“PEUC”) under Section 2107 of the CARES Act. Coverage included individuals who had exhausted all rights to regular UI or extended benefits under state or federal law or PEUC. Under the PUA provisions of the CARES Act, a person who was a business owner, self-employed worker, independent contractor or “gig” worker could qualify for PUA benefits administered by NYSDOL if he or she previously performed such work in New York and was unemployed, partially unemployed, unable to work or unavailable to work due to a COVID-19-related reason. A PUA claimant was required to answer various questions to establish eligibility for PUA benefits. Claimants were required to provide their name, date of birth, Social Security number and mailing address. Claimants were also required to identify a qualifying occupational status and COVID-19-related reason for being out of work. The eligible timeframe to receive PUA was from weeks of unemployment beginning on or after January 27, 2020 through December 31, 2020.

7. FPUC provided individuals who were collecting regular UI and PUA benefits, among other forms of benefits, with an additional \$600 per week. In New York, the eligible timeframe to receive FPUC was from weeks of unemployment beginning on or about April 5, 2020 through July 26, 2020.

8. On August 8, 2020, the President of the United States signed a Presidential Memorandum authorizing the Federal Emergency Management Agency (“FEMA”) to use disaster relief funds pursuant to Section 408 of the Stafford Act to provide supplemental payments for lost wages and to help ease the financial burden on individuals unemployed as a result of COVID-19. These supplemental payments were administered through the Lost Wages Assistance Program (“LWAP”), which served as a temporary measure to provide an additional \$300 per week through a total of \$44 billion in FEMA funds. LWAP was available from on or about August 1, 2020 through December 27, 2020.

9. On December 27, 2020, the President of the United States signed the Consolidated Appropriations Act, 2021 into law, which included the Continued Assistance for Unemployed Workers Act of 2020 (the “Continued Assistance Act”). The Continued Assistance Act extended PUA benefits to March 14, 2021 and reauthorized and modified FPUC to provide supplemental payments of \$300 per week for the period between on or about December 26, 2020 through March 14, 2021.

10. There were two primary methods to file for NYSUIF benefits: online through the NYDOL website and by telephone through a NYDOL call center. If the claim was accepted, the claimant was required to establish, on a weekly basis, his or her continued eligibility for UI benefits. The claimant could complete this recertification by answering a series of questions on the NYSDOL website or through a NYSDOL call center.

11. KeyBank National Association (“KeyBank”) was a bank headquartered in Cleveland, Ohio. The NYSDOL used KeyBank bank accounts to fund NYSUIF benefits. KeyBank issued some claimants debit cards to which NYSUIF benefit payments were credited. Other claimants acquired reloadable cards issued by different banks and provided

the information for the reloadable cards through the NYSDOL website, which cards were then loaded with NYSUIF benefit payments. Other claimants had NYSUIF benefits directly deposited into personal bank accounts.

II. The Fraudulent Scheme

12. As described below, I have probable cause to believe that the defendants ROMEAN BROWN, TYREK CLARKE, KENNITH DESIR, STEPHAN DORMINVIL, KAI HEYWARD, KEITH JAMES, CHRISTOPHER JEAN PIERRE, ONEAL MARKS, JAHRIAH OLIVIERRE, ROLEEKE SMITH and CHRISTOPHER TOPEY are all members or associates of the Woo street gang, which is based in Brooklyn, New York.

13. In or about and between March 2020 and October 2021, the defendants ROMEAN BROWN, TYREK CLARKE, KENNITH DESIR, STEPHAN DORMINVIL, KAI HEYWARD, KEITH JAMES, CHRISTOPHER JEAN PIERRE, ONEAL MARKS, JAHRIAH OLIVIERRE, ROLEEKE SMITH and CHRISTOPHER TOPEY, together with others, submitted and caused to be submitted nearly 1,000 fraudulent claims to the NYSDOL for NYSUIF benefits using the personal identifying information (“PII”), including names, dates of birth, and Social Security numbers, of real individuals (the “Victims”), whose identities are known to your deponent.

14. Using the Victims’ PII, the defendants ROMEAN BROWN, TYREK CLARKE, KENNITH DESIR, STEPHAN DORMINVIL, KAI HEYWARD, KEITH JAMES, CHRISTOPHER JEAN PIERRE, ONEAL MARKS, JAHRIAH OLIVIERRE, ROLEEKE SMITH and CHRISTOPHER TOPEY, together with others, created or caused to be created fraudulent NYSDOL UI benefits accounts in the Victims’ names, and thereby

caused NYSDOL to load benefit funds onto KeyBank debit cards in the names of the Victims. The addresses associated with the accounts, which were provided by the defendants and their co-conspirators, were not the Victims' true addresses, but were instead addresses controlled by the defendants and their co-conspirators, including residences of the defendants located in the Eastern District of New York and elsewhere. Therefore, KeyBank sent debit cards in the Victims' names, via the United States mail, to the defendants and their coconspirators, rather than to the Victims.

15. The defendants ROMEAN BROWN, TYREK CLARKE, KENNITH DESIR, STEPHAN DORMINVIL, KAI HEYWARD, KEITH JAMES, CHRISTOPHER JEAN PIERRE, ONEAL MARKS, JAHRIAH OLIVIERRE, ROLEEKE SMITH and CHRISTOPHER TOPEY, together with others, used the KeyBank debit cards bearing the names of the Victims to withdraw U.S. currency from ATM machines located in the Eastern District of New York and elsewhere.

16. According to information from the NYS-DOL, fraudulent unemployment insurance claims connected to the defendants' fraudulent scheme have been certified as recently as October 2021.²

17. The above-described fraudulent scheme resulted in an actual loss of approximately \$4,339,475.90 and an intended loss of approximately \$20,992,365.00, which includes additional claims filed by the defendants and their co-conspirators that were blocked as fraudulent.

² Based on my training, experience, and investigation of this case to date, I know that the NYS-DOL requires claimants to certify their continuing eligibility for unemployment insurance periodically. A claimant may complete the certification online.

A. CHRISTOPHER JEAN PIERRE

18. CHRISTOPHER JEAN PIERRE (“JEAN PIERRE”) is a resident of Brooklyn, New York. I have examined the contents of four telephones used by CHRISTOPHER JEAN PIERRE that were searched pursuant to search warrants.

i. Claims in the Names of Victims 1 Through 4

19. JEAN PIERRE’s cellular telephones contain numerous Telegram Messenger (“Telegram”) messages between JEAN PIERRE and others concerning the purchase of stolen identities and the filing of fraudulent unemployment insurance claims.

20. For instance, beginning on or about October 6, 2020, JEAN PIERRE sent Telegram messages to an individual identified in JEAN PIERRE’s cellular telephone as “Skyscraper TLO and Profiles” (“Skyscraper”), in which JEAN PIERRE asked Skyscraper to purchase stolen identities. On or about October 6, 2020, JEAN PIERRE and Skyscraper exchanged the following messages:

JEAN PIERRE: Yoo bro I need NY pros with the DL ASAP

Skyscraper: is 150

JEAN PIERRE: Ok
Send Address

Skyscraper: 1N5iCjnJK6abiVx8[XXXXXXXXXXXXXXXXXXXX]

Based on my training, experience, and investigation of this case to date, I believe that JEAN PIERRE was asking to purchase stolen identities of New York residents (“pros”), including driver license numbers (“DL”), and that Skyscraper was setting the price at \$150 per stolen identity. The last message from Skyscraper appears to be the address of a virtual currency wallet to accept payment.

21. Later that day, Skyscraper sent JEAN PIERRE the name, date of birth, social security number, address, phone number, email address, and driver license number of a New York resident (“Victim 1”).

22. NYS-DOL records show that an unemployment insurance claim was then filed that same day on or about October 7, 2020 in Victim 1’s name. The application listed Victim 1’s true name, date of birth, and social security number, but listed a certain address on Nostrand Avenue in Brooklyn, New York (“the Nostrand Avenue Address”) as Victim 1’s mailing address. The claim in Victim 1’s name was blocked as potentially fraudulent.

23. The next day, on or about October 8, 2020, JEAN PIERRE asked Skyscraper to purchase additional stolen identities and wrote in one message: “Im tryna get rich bro.” Later that day, Skyscraper sent JEAN PIERRE the names, dates of birth, social security numbers, addresses, email addresses, and driver license numbers of three New York residents: Victim 2, Victim 3, and Victim 4.

24. NYS-DOL records show that unemployment insurance claims were then filed later that day and the next day in the names of Victim 2, Victim 3, and Victim 4. The applications listed the true names, dates of birth, and social security numbers of Victims 2, 3, and 4, but listed apartments at the Nostrand Avenue Address as their mailing address.

25. With respect to the claim filed in Victim 2’s name, a KeyBank debit card ending in 1632 (the “1632 KeyBank Card”) was issued in the name of Victim 2.³

³ The claims in the names of Victims 3 and 4 were blocked as potentially fraudulent.

26. On or about November 12, 2020, at approximately 9:40 a.m., JEAN PIERRE used the 1632 KeyBank Card in Victim 2's name to withdraw approximately \$180.00 from an ATM in the Gateway Center shopping mall in Brooklyn, New York (the "Gateway Center"). Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of JEAN PIERRE from law enforcement databases and publicly-available social media postings, I believe that the individual depicted in the photograph is JEAN PIERRE:



27. Based upon information provided to me by NYPD officers, on or about December 1, 2020, an NYPD police officer stopped an Infiniti Q50 vehicle for driving with excessively tinted windows. Upon approaching the driver's side of the vehicle, the police officer observed JEAN PIERRE seated in the driver's seat and another individual seated in the front passenger's seat. The officer smelled marijuana emanating from the vehicle. The police officer then searched the vehicle and recovered, among other items, marijuana from the center console and a Gucci purse-style bag from the back seat. The officer searched the bag and recovered, among other items, three KeyBank debit cards in the name of individuals other than JEAN PIERRE, including the 1632 KeyBank Card issued in Victim 2's name. In

sum and substance, JEAN PIERRE admitted that the bag and the cards inside the bag belonged to him.

28. According to the NYS-DOL, the actual loss associated with the claim in Victim 2's name is approximately \$15,596.00.

ii. Other Claims Connected to JEAN PIERRE

29. JEAN PIERRE's cellular telephones contain numerous Telegram messages between JEAN PIERRE and others concerning the purchase of stolen identities and the filing of fraudulent unemployment insurance claims. Some of these messages are discussed below in more detail with respect to other defendants.

30. For instance, on or about and between March 2 and March 4, 2020, in a Telegram conversation with an individual identified in JEAN PIERRE's cellular telephone as "Flossbready101," JEAN PIERRE sent two photographs of driver licenses belonging to individuals other than himself.

31. On or about September 19, 2020, JEAN PIERRE sent Flossbready101 a series of screenshots showing that JEAN PIERRE was intending to submit an application for unemployment insurance with the State of Nebraska on the basis of hardship due to COVID-19. Below are two of those screenshots:

11:42 networks.nebraska.gov

To file an unemployment insurance claim, make that selection during Registration for an Individual account or under Unemployment Services if you have an existing account.
Para llenar un reclamo de desempleo, haga esa selección mientras se registra como individuo o bajo el menú de Servicios de Desempleo si ya tiene una cuenta existente.

Home My Dashboard Sign Out
Services for Individuals Services for Employers
Labor Market Analysis

Page 1 of 1

COVID-19 Self-Certification: I acknowledge that I understand that: a) making this certification is under the penalty of perjury; b) intentional misrepresentation in self-certifying that I am affected by COVID-19 in one or more of these categories is fraud; and c) if it is determined that I have committed fraud, I may be subject to criminal prosecution.

I have read and understand the information regarding potential fraud penalties and acknowledge that the information on this page is true and accurate and wish to continue to file my weekly certification.

[[Unemployment Compensation Fraud Information](#)]

<< Back Next >>

Exit Weekly Certification

11:21 networks.nebraska.gov

To file an unemployment insurance claim, make that selection during Registration for an Individual account or under Unemployment Services if you have an existing account.
Para llenar un reclamo de desempleo, haga esa selección mientras se registra como individuo o bajo el menú de Servicios de Desempleo si ya tiene una cuenta existente.

My Dashboard Register/Sign In Services for Individuals Services for Employers

who is closed due to COVID-19.

You become the breadwinner or major support for a household because the head of the household has died as a direct result of COVID-19.

You were to start working but was unable to due to the closure of the business caused by COVID-19.

You were laid off due to a lack of work after a business closure caused by COVID-19.

Your employer reduced your hours due to COVID-19.

A reason not listed above.

* Do you currently have a business license?
 Yes No

* What is the date that you last performed work?
 (mm/dd/yyyy) Today

* Did your employer offer you the ability to

32. In addition, according to records obtained from CSC Holdings, LLC, an IP address ending in .207 (the “.207 IP Address”) is associated with JEAN PIERRE’s residence, which is a certain apartment on East 87th Street in Brooklyn, New York. According to NYS-DOL records, approximately 46 different unemployment insurance claims were accessed from the .207 IP Address. None of those claims was in JEAN PIERRE’s name.

33. In addition, approximately 10 separate unemployment insurance claims (none of which was in JEAN PIERRE’s names) listed JEAN PIERRE’s residence on East 87th Street in Brooklyn, New York as the mailing address.

B. CHRISTOPHER TOPEY

34. NYS-DOL records show that, on or about November 9, 2020, an unemployment insurance claim was filed in the name of a New York resident (“Victim 5”). The application used the true name, date of birth, and social security number of Victim 5 but listed a certain address on East 84th Street in Brooklyn, New York (the “East 84th Street Address”), which is a single-family residence, as Victim 5’s mailing address.

35. With respect to the claim filed in Victim 5’s name, a KeyBank debit card ending in number 1733 (the “1733 KeyBank Card”) was issued in the name of Victim 5.

36. On or about December 21, 2020, Telegram user “T Pop” sent JEAN PIERRE a screenshot from the NYS-DOL website showing information relating to the claim in Victim 5’s name. I believe that Telegram user “T Pop” was TOPEY because the Telegram Peer ID number for user “T Pop” is linked in the Contacts application of JEAN PIERRE’s cellular telephones with a certain telephone number ending in -3323 (the “3323 Phone Number”). According to records obtained from AT&T Corporation, the 3323 Phone Number is subscribed in the name of an individual believed to be TOPEY’s mother (also with the last name Topey) at a certain address on Beach Place in Brooklyn, New York.⁴

37. Two days later, on or about December 23, 2020, TOPEY sent JEAN PIERRE the following Telegram message: “I’m about to put apps in tomorrow.” Based on my training, experience, and investigation of this case to date, I believe that TOPEY was indicating his intention to file additional applications (“apps”) for unemployment insurance.

⁴ On or about December 18, 2021, NYPD officers knocked on the door of the Beach Place residence and encountered TOPEY’s mother, who identified herself as such.

38. On or about December 27, 2020, at approximately 12:28 p.m., JEAN PIERRE used the 1733 KeyBank Card in Victim 5's name to withdraw approximately \$1,000.00 from an ATM in the Gateway Center. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of JEAN PIERRE from law enforcement databases and publicly-available social media posts, I believe that the individual shown in the photograph is JEAN PIERRE:



39. Two days later, on or about December 29, 2020, at approximately 1:19 p.m., TOPEY used the 1733 KeyBank Card in Victim 5's name to withdraw approximately \$400.00 from an ATM in Brooklyn, New York. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of TOPEY from law enforcement databases and publicly-available social media posts, I believe that the individual shown in the photograph is TOPEY:



40. NYS-DOL records show that an individual using the 3323 Phone Number, i.e., TOPEY's phone number, called the NYS-DOL on or about January 16, 2021 to check the balance of the 1733 KeyBank Card issued in the name of Victim 5.

41. According to the NYS-DOL, the actual loss associated with the claim in Victim 5's name is approximately \$12,178.00.

C. ROLEEKE SMITH

i. Claim in the Name of Victim 6

42. I have examined the contents of a telephone seized from ROLEEKE SMITH incident to his arrest by NYPD officers on or about August 7, 2021, and searched pursuant to a search warrant.

43. On or about December 8, 2020, JEAN PIERRE sent via Telegram the name, address, birth date, social security number, and driver license of a New York resident (“Victim 6”) to SMITH.⁵

44. NYS-DOL records show that an unemployment insurance claim was then filed in the name of Victim 6 the next day on or about December 9, 2020 from the .207 IP Address linked to JEAN PIERRES’s residence. Thus, I have probable cause to believe that JEAN PIERRE was involved in the submission of the fraudulent unemployment insurance claim in Victim 6’s name.

45. I also have probable cause to believe that SMITH was involved in the submission of the fraudulent unemployment insurance claim in Victim 6’s name. The application listed the true name, date of birth, and social security number of Victim 6 but listed a certain address on Metropolitan Avenue in Brooklyn, New York (“the Metropolitan Avenue Address”) as Victim 6’s mailing address. The Metropolitan Avenue Address is saved as a note on SMITH’s cellular telephone.

46. The fraudulent unemployment insurance claim in Victim 6’s name also used the email address robready19@gmail.com as an email address for Victim 6. According to records obtained from Google LLC, the recovery phone number for the email address robready19@gmail.com is a certain telephone number ending in -2254 (the “2254 Number”), and according to records obtained from AT&T, the 2254 Number is registered to SMITH’s father at a certain address located at East 99th Street in Brooklyn, New York (the

⁵ This message was recovered from both JEAN PIERRE’s cellular telephone and SMITH’s cellular telephone.

“East 99th Street Address”). Further, when SMITH was arrested on or about August 7, 2021, he told NYPD officers that he resided at the East 99th Street Address.

47. According to the NYS-DOL, no actual loss was associated with this claim because the claim was blocked as potentially fraudulent.

ii. Additional Claims Connected to SMITH, Including Claims in the Names of Victims 7, 8, 9, 10 and 11

48. NYS-DOL records show that an unemployment insurance claim was filed in the name of a New York resident (“Victim 7”) on or about February 15, 2021. The application listed the true name, date of birth, and social security number of Victim 7 but, as with the application submitted in Victim 6’s name, listed the Metropolitan Avenue Address as the mailing address.

49. With respect to the claim filed in Victim 7’s name, a KeyBank debit card ending in number 8651 (the “8651 KeyBank Card”) was issued in the name of Victim 7.

50. On or about March 12, 2021, at approximately 11:30 a.m., SMITH used the 8651 KeyBank Card in Victim 7’s name to withdraw approximately \$800.00 from an ATM in the Gateway Center. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of SMITH from law enforcement databases and publicly-available social media postings, I believe that the individual depicted in the photograph is SMITH:



51. According to the NYS-DOL, the actual loss associated with the claim in Victim 7's name is approximately \$14,042.00.

52. NYS-DOL records also show that approximately eight fraudulent unemployment insurance claims in the names of New York residents other than SMITH have been submitted using the East 99th Street Address where SMITH resides.

53. One of those claims, filed in the name of a New York resident ("Victim 8"), was submitted on or about November 18, 2020 from the .207 IP Address associated with JEAN PIERRE's residence. According to the NYS-DOL, the actual loss associated with the claim in Victim 8's name is approximately \$728.00.

54. Another one of these claims was filed in the name of a New York resident ("Victim 9") on or about November 20, 2020. The application listed the true name, date of birth, and social security number of Victim 9 but listed the East 99th Street Address as Victim 9's mailing address. The application in Victim 9's name listed the email address offathirty22@gmail.com, which according to records obtained from Google LLC is associated with a certain telephone number ending in -2078 (the "2078 Phone Number").

According to records obtained from AT&T Corporation, the user of the 0278 Number is “Roleek Smith” at the East 99th Street Address where SMITH resides. Moreover, AT&T records show that the bills for the 2078 Phone Number for the months of January 2021, March 2021, and April 2021 were paid using two bank cards in the names of individuals other than SMITH who are California residents (“Victim 10” and “Victim 11”). According to DOL records, both of those bank cards are associated with claims for unemployment insurance filed in Victims 10 and 11’s names with the State of California.

55. Three days later, on or about November 23, 2020, SMITH sent to another Telegram user (“BREADD5”) a screenshot from the NYS-DOL concerning the unemployment insurance claim in Victim 9’s name. On or about January 6, 2021, SMITH sent via Telegram to another Telegram user the names, addresses, and dates of birth of Victims 10 and 11, as well as the bank card numbers issued in their names that were used to pay SMITH’s telephone bill.

D. ONEAL MARKS

i. Claim in the Name of Victim 12

56. On or about October 15, 2020, an unemployment insurance claim was filed in the name of a New York resident (“Victim 12”). The application listed the true name, date of birth, and social security number of Victim 12 but listed an address on East 85th Street in Brooklyn, New York as Victim 12’s mailing address.

57. With respect to the claim filed in Victim 12’s name, a KeyBank debit card ending in 9013 (the “9013 KeyBank Card”) was issued in the name of Victim 12.

58. On or about November 13, 2020, at approximately 9:26 a.m., MARKS used the 9013 KeyBank Card in Victim 12’s name to withdraw approximately \$1,000.00

from an ATM in the Gateway Center. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of MARKS from law enforcement databases and publicly-available social media postings, I believe that the individual depicted in the photograph is MARKS:



59. According to the NYS-DOL, the actual loss associated with the claim in Victim 12's name is approximately \$26,112.00.

ii. Additional Claims Connected to MARKS, Including Claim in the Name of Victim 13

60. On or about March 30, 2020, an individual identified in JEAN PIERRE's cellular telephone as "Omelly" sent the following Telegram messages to JEAN PIERRE and others:

Woke up and cleaned already
Did like 2.5 already got one more band
20k tomorrow watch

JEAN PIERRE replied: "That's a breesh." Based on my training, experience, and investigation of this case to date, I believe that "Omelly" was stating that he had successfully filed for \$2,500 worth of unemployment insurance ("Did like 2.5 already") and planned to do

more the next day (“20k tomorrow watch”), to which JEAN PIERRE commented that it was a big score (“a breesh”).

61. I believe that Telegram user “Omelly” is ONEAL MARKS because the Peer ID number for Telegram user “Omelly” is associated with a certain phone number ending in -9589 (the “9589 Phone Number”) in one of JEAN PIERRE’s cellular telephones. According to records obtained from T-Mobile, the 9589 Phone Number is subscribed to an individual believed to be a close relative of MARKS (also with the last name Marks).⁶

62. The Peer ID number for Telegram user “Omelly” is the same Peer ID for Telegram user “Oneal.” Based on my training, experience, and investigation of this case to date, I understand that a Telegram Peer ID number remains fixed even though a Telegram user can change his or her username (such as “Omelly” and “Oneal”). Accordingly, I believe that MARKS uses both Telegram user names “Oneal” and “Omelly.”

63. On or about December 2, 2020, Telegram user “Oneal” sent ROLEEKE SMITH the name, address, date of birth, social security number, and driver license number of a New York resident (“Victim 13”). Telegram user “Oneal” then wrote: “Ight made a email and create an account” and “Start it,” to which SMITH replied: “Bet.”

64. The same day, on or about December 2, 2020, an unemployment insurance claim was filed in the name of Victim 13. The application used the true name,

⁶ Law enforcement agents were able to view the license plate of the vehicle that MARKS was driving in the photograph depicted in paragraph 58, and based on the license plate, law enforcement agents have determined that this vehicle is registered to the same individual believed to be a close relative of MARKS. Moreover, based on my review of NYPD records, I know that MARKS was issued two summonses for driving infractions — one on or about March 4, 2021, and a second on or about June 27, 2021 — while driving an Infiniti vehicle registered to that same individual.

date of birth, and social security number of Victim 13 but listed the East 99th Street Address (SMITH's address) as Victim 13's mailing address. According to the NYS-DOL, no actual loss was associated with this claim because the claim was blocked as potentially fraudulent.

E. KENNITH DESIR

i. Claim in the Name of Victim 14

65. NYS-DOL records show that an unemployment insurance claim was filed on or about March 3, 2021, in the name of another New York resident ("Victim 14"). The application listed Victim 14's true name, date of birth, and social security number, but listed a different address in Brooklyn, New York as Victim 14's mailing address.

66. I have examined the contents of a telephone seized from DESIR incident to his arrest by NYPD officers on or about July 14, 2021, and searched pursuant to a search warrant (the "DESIR Cell Phone"). The Notes application of the DESIR Cell Phone contains a saved note, created on or about March 3, 2021, i.e., the same day that Victim 14's unemployment insurance claim was filed, which lists the username of the online account that was created in Victim 14's name to submit the claim.

67. With respect to this claim in Victim 14's name, a KeyBank debit card ending in 4139 (the "4139 KeyBank Card") was issued in the name of Victim 14.

68. On or about August 24, 2021 at approximately 8:56 a.m., DESIR used the 4139 KeyBank Card in Victim 14's name to withdraw approximately \$480.00 from a certain ATM in Brooklyn, New York. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of DESIR from law enforcement databases and publicly-available social media posts, I believe that the individual shown in the photograph is DESIR:



69. According to the NYS-DOL, the actual loss associated with the claim in Victim 14's name is approximately \$16,934.00.

ii. Additional Claims Connected to DESIR, Including Claims in the Names of Victims 15 and 16

70. Based on my review of the contents of the DESIR Cell Phone, I know that the Telegram Peer ID associated with DESIR's Telegram account is 1299856097. JEAN PIERRE's cellular telephones contain a series of Telegram messages sent on or about August 10, 2020 between JEAN PIERRE and DESIR (using the Telegram account associated with Peer ID 1299856097), in which JEAN PIERRE and DESIR exchange the names and addresses of certain individuals whom I believe are the victims of identity theft.⁷

⁷ These messages are not on the DESIR Cell Phone that I have reviewed. That cellular telephone contains Telegram messages between DESIR and JEAN PIERRE beginning only on or about April 8, 2021.

71. For example, NYS-DOL records show that an unemployment insurance claim was filed on or about October 21, 2020, in the name of another New York State resident (“Victim 15”). The application listed Victim 15’s true name, date of birth, and social security number, but listed DESIR’s address, which is a certain address at 85th Street in Brooklyn, New York, as Victim 15’s mailing address.

72. Nine days later, on or about October 30, 2020, DESIR sent via Telegram the name, address, birth date, social security number, and driver license number of Victim 15 to a Telegram user named “Akil.” DESIR then sent another message containing DESIR’s home address on 85th Street in Brooklyn.

73. According to the NYS-DOL, the actual loss associated with the claim in Victim 15’s name is approximately \$504.00.

74. NYS-DOL records show that an unemployment insurance claim was filed on or about February 15, 2021, in the name of another New York State resident (“Victim 16”). The application listed Victim 16’s true name, date of birth, and social security number, but listed an address on East 84th Street in Brooklyn, New York as Victim 16’s residence. The application also listed the email address brimjew@gmail.com. I am aware from my review of the DESIR Cell Phone records that the email address “brimjew@gmail.com” is a user account on the DESIR Cell Phone.

75. A few weeks later, on or about March 4, 2021, DESIR sent via Telegram the name, address, birth date, social security number, and driver license number of Victim 16 to a Telegram user named “CallOut CashOut.”

76. According to the NYS-DOL, the claim in Victim 16’s name was blocked as potentially fraudulent.

77. In addition to email address brimjew@gmail.com, the email address kdesir@victorycollegiate.org is another user account on the DESIR Cell Phone. Notably, according to information obtained from Google LLC, the email address kdesir@victorycollegiate.org is linked by web cookies to email addresses associated with other defendants.⁸ For instance, kdesir@victorycollegiate.org is linked by web cookies to email address MG82BB@gmail.com, which was the email address used to file the above-described claim in Victim 8's name, and which is connected with JEAN PIERRE and SMITH. Because these records obtained from Google LLC establish that both kdesir@victorycollegiate.org and MG82BB@gmail.com were accessed during the same browser session, I have probable cause to believe that DESIR, JEAN PIERRE, and SMITH were working together to defraud NYS-DOL using stolen identities.

F. KEITH JAMES

i. Claim in the Name of Victim 17

78. NYS-DOL records show that an unemployment insurance claim was filed on or about November 4, 2020, in the name of another New York resident ("Victim 17"). The application used Victim 17's true name, date of birth, and social security number, but listed a different address in Queens, New York as Victim 17's mailing address.

⁸ Based on my training and experience, a "web cookie" or "cookie" allows an online service provider to determine whether multiple online accounts are accessed during the same browser session and thus are controlled by the same user. A "cookie" is a piece of data stored on a user's computer sent from a website that the user accessed for the purpose of, among other things, tracking a user's browsing activity or account(s) that the user has logged into.

79. With respect to this claim in Victim 17's name, a KeyBank debit card ending in 9413 (the "9413 KeyBank Card") was issued in the name of Victim 17.

80. On or about April 28, 2021, at approximately 2:30 p.m., JAMES used the 9413 KeyBank Card in Victim 17's name to withdraw approximately \$470.00 from an ATM in the Gateway Center. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of JAMES from law enforcement databases and publicly-available social media posts, I believe that the individual shown in the photograph is JAMES:



81. According to the NYS-DOL, the actual loss associated with the claim in Victim 17's name is approximately \$26,200.00.

ii. Additional Claims Connected to JAMES

82. Telegram Peer ID 1022991278 is connected with a certain telephone number ending in -0842 (the "0842 Phone Number") that is listed in JEAN PIERRE's cellular telephone. According to records obtained from Sprint Corporation, the 0842 Phone Number is subscribed in the name of an individual believed to be JAMES's mother (also with the last name James) who resides at JAMES's residence on East 99th Street in

Brooklyn, New York.⁹ Accordingly, I believe that JAMES uses Telegram Peer ID 1022991278.

83. As noted above, I have reviewed the contents of SMITH's cellular telephone pursuant to a search warrant. SMITH's cellular telephone contains numerous Telegram messages with Telegram Peer ID 1022991278 (identified by the username "Keith") in SMITH's cellular telephone concerning unemployment insurance claims and identity theft.

84. For instance, on or about December 8, 2020, SMITH sent JAMES the Metropolitan Avenue Address, which, as discussed above, was used in connection with the claims filed in the names of Victim 6 and Victim 7.

85. On or about February 19, 2021, SMITH sent JAMES the name, address, date of birth, and social security number of Victim 6.

86. NYS-DOL records show that four other unemployment insurance claims were filed listing a certain address at East 99th Street in Brooklyn, New York as the mailing address. This address is JAMES's home address. Moreover, NYS-DOL records show that those claims were accessed from an IP addressing ending in 16.32 (the "16.32 IP Address"), which is registered to an individual believed to be JAMES's mother at the same address on East 99th Street in Brooklyn, New York.

⁹ On or about December 18, 2021, NYPD officers knocked on the door of JAMES's residence at East 99th Street in Brooklyn, New York and encountered JAMES's mother, who identified herself as such.

87. According to NYS-DOL records, approximately 94 separate unemployment insurance claims in names other than JAMES's were accessed from the 16.32 IP Address, including the above-described claim in the name of Victim 17.

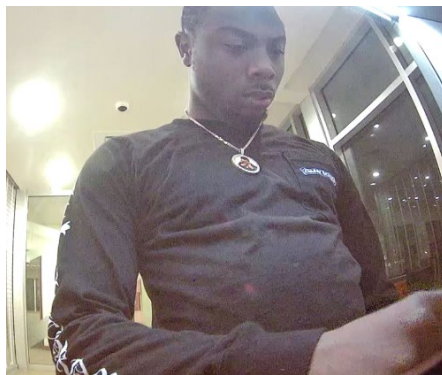
G. TYREK CLARKE

88. NYS-DOL records show that an unemployment insurance claim was filed on or about November 7, 2020, in the name of another New York resident ("Victim 18"). The application used Victim 18's true name, date of birth, and social security number, but listed a different address in Queens, New York as Victim 18's mailing address.

89. The claim in Victim 18's name was submitted from the 16.32 IP Address, which, as noted above, is registered to JAMES's address. Accordingly, I believe that JAMES was involved in the filing of this claim, as well.

90. With respect to the claim filed in Victim 18's name, a KeyBank debit card ending in 5420 (the "5420 KeyBank Card") was issued in the name of Victim 18.

91. On or about December 8, 2020 at approximately 7:42 p.m., CLARKE used the 5420 KeyBank Card in Victim 18's name to withdraw approximately \$1,000.00 from a certain ATM in Miami, Florida. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of CLARKE from law enforcement databases and publicly-available social media posts, I believe that the individual shown in the photograph is CLARKE:



92. Based on Miami Beach Police reports that I have reviewed, I am aware that three days later, on or about December 11, 2020, Miami Beach Police officers stopped a Mercedes vehicle driven by CLARKE for failing to maintain a single lane as he drove on a causeway. CLARKE attempted to switch seats with the front passenger before the officers arrived at the vehicle, and while doing so, the vehicle switched gears into reverse and crashed into an officer's vehicle. CLARKE admitted, in sum and substance, that he switched seats with the passenger because he did not have a valid driver license. CLARKE was arrested and found to be in possession of the 5420 KeyBank Card in Victim 18's name.

93. According to the NYS-DOL, the actual loss associated with the claim in Victim 18's name is approximately \$12,048.00.

H. JAHRIAH OLIVIERRE

i. Claim in the Name of Victim 19

94. NYS-DOL records show that an unemployment insurance claim was filed on or about January 20, 2021, in the name of another New York resident ("Victim 19"). The application used Victim 19's true name, date of birth, and social security number, but listed a different address in Brooklyn, New York as Victim 19's mailing address. The email address listed for this claim is bigbready@mail.com.

95. According to records obtained from Mail.com, the backup email address associated with bigbready@mail.com is bigbready016@gmail.com. Email address bigbready016@gmail.com is linked by web cookies with email address bigbready117@gmail.com, among other email addresses. Email address bigbready117@gmail.com was recovered as a user account for a cellular telephone that was seized from OLIVIERRE incident to an unrelated arrest by NYPD officers on or about March 26, 2021, and searched pursuant to a search warrant.¹⁰ Accordingly, I believe that OLIVIERRE was the user of email addresses bigbready@mail.com and bigbready016@gmail.com, and that OLIVIERRE was therefore involved in the filing of the claim in Victim 19's name.

96. With respect to the claim filed in Victim 19's name, a KeyBank debit card ending in 6424 (the "6424 KeyBank Card") was issued in the name of Victim 19.

97. On or about February 10, 2021 at approximately 1:53 p.m., OLIVIERRE used the 6424 KeyBank Card in Victim 19's name to withdraw approximately \$100.00 from a certain ATM in Miami, Florida. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of OLIVIERRE from law enforcement databases and publicly-available social media posts, I believe that the individual shown in the photograph is OLIVIERRE:

¹⁰ Thus far, law enforcement has managed to create only a partial forensic extraction from this cellular telephone.



Notably, OLIVIERRE is wearing the same distinctive bracelets on both his right and left wrists as he is wearing in the below photograph of OLIVIERRE posted on social media:



98. According to the NYS-DOL, the actual loss associated with the claim in Victim 19's name is approximately \$482.00.

ii. Additional Claims Connected to OLIVIERRE

99. I have reviewed the contents of a partial forensic extraction of OLIVIERRE's cellular telephone pursuant to a search warrant. OLIVIERRE's cellular telephone was associated with the Apple ID therealbready22@icloud.com.

100. According to records from Apple, Inc., the billing profile for Apple ID therealbready22@icloud.com was created on or about January 30, 2021, from an IP address ending in .223.6 (the ".223.6 IP Address").

101. According to NYS-DOL records, 106 separate unemployment insurance claims were accessed from the .223.6 IP Address, including the above-described claim in the name of Victim 19, as well as the above-described claim in the name of Victim 8, which is also connected to JEAN PIERRE and SMITH.

102. As noted above, email address bigbready117@gmail.com was recovered as a user account associated with OLIVIERRE's cellular telephone seized incident to arrest and searched pursuant to a search warrant. Email address bigbready117@gmail.com is linked by web cookies to the following email addresses, all of which were used to file separate unemployment insurance claims in the names of individuals other than OLIVIERRE, among others: bigbready023@gmail.com, bigbready151@gmail.com, bigbready155@gmail.com, bigbready31@gmail.com, bigbready8@gmail.com, and bigbready87@gmail.com. Accordingly, I have probable cause to believe that OLIVIERRE was involved in the submission of those fraudulent claims, as well.

I. KAI HEYWARD

i. Claim in the Name of Victim 20

103. NYS-DOL records show that an unemployment insurance claim was filed in the name of Victim 20 on or about January 16, 2021. The application used the true name, date of birth, and social security number of Victim 20 but listed a certain address on East 83rd Street in Brooklyn, New York (the "East 83rd Street Address") as Victim 20's mailing address.

104. According to an NYPD arrest report, HEYWARD was arrested on or about December 3, 2020, and provided the East 83rd Street Address as his address.

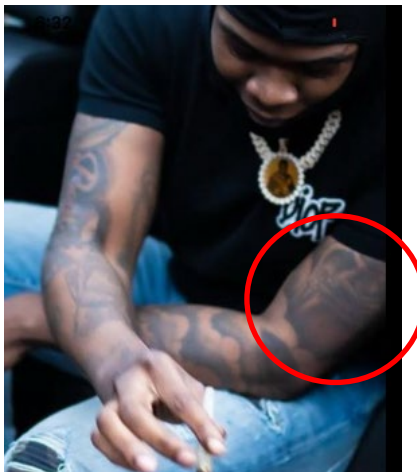
105. The claim in Victim 20's name was accessed multiple times from an IP address ending in 230.96 (the "230.96 IP Address"), which, according to records obtained from CSC Holdings, LLC, is the IP address linked with the East 83rd Street Address, i.e., HEYWARD's residence.

106. With respect to the claim filed in Victim 20's name, a KeyBank debit card ending in 0684 (the "0684 KeyBank Card") was issued in the name of Victim 20.

107. On or about June 8, 2021, at approximately 10:37 a.m., HEYWARD used the 0684 KeyBank Card in Victim 20's name to withdraw approximately \$480.00 from an ATM in Brooklyn, New York. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of HEYWARD from law enforcement databases and publicly-available social media postings, I believe that the individual depicted in the photograph is HEYWARD:



Below is a photograph from a publicly-available social media post of HEYWARD with the same distinctive tattoo on his left arm (circled in red above and below):



108. According to the NYS-DOL, the actual loss associated with the claim in Victim 20's name is approximately \$16,870.00.

ii. Additional Claims Connected to HEYWARD

109. According to NYS-DOL records, 23 separate unemployment insurance claims in names other than HEYWARD's were accessed from the 230.96 IP Address, including the above-described claim in the name of Victim 20.

110. According to records obtained from Google, email address kaithegod24@gmail.com is subscribed in the name of "Kai Heyward" and has been accessed multiple times from the 230.96 IP Address. Google records also show that this email address was accessed three times from the 16.32 IP Address (the IP address associated with JAMES's address), including once on or about December 6, 2020, at approximately 8:23 a.m. Less than two hours later, at approximately 10:05 a.m., the claim in the name of Victim 17 (tied to JAMES) was certified from the same 16.32 IP Address. Accordingly, I have probable cause to believe that HEYWARD and JAMES were together on this date and time when the claim in the name of Victim 17 was certified.

J. ROMEAN BROWN

i. Claim in the Name of Victim 21

111. NYS-DOL records show that an unemployment insurance claim was filed in the name of Victim 21 on or about December 14, 2020. The application used the true name, date of birth, and social security number of Victim 21 but listed a certain address on Maujer Street in Brooklyn, New York as Victim 21's mailing address.

112. With respect to the claim filed in Victim 21's name, a KeyBank debit card was issued in the name of Victim 21.

113. Based upon information provided to me by NYPD officers, on or about January 8, 2021, NYPD officers pulled over a BMW vehicle driven by BROWN on 84th Street in Brooklyn, New York for failing to stop at a stop sign. The officers ordered BROWN to exit the vehicle after smelling marijuana and then searched a bag inside the vehicle. The officers recovered three KeyBank debit cards in the names of individuals other than BROWN, including a KeyBank debit card in the name of Victim 21, from the bag. BROWN was then released from custody after the officers issued BROWN a summons.

114. The next day, on or about January 9, 2021, an individual called KeyBank pretending to be Victim 21 and stated, in sum and substance, that he had lost his card.

According to records obtained from KeyBank, the individual called KeyBank from a certain telephone number ending in -7211 (the "7211 Phone Number"). According to records obtained from the telecommunications provider Pinger, an account for the 7211 Phone Number had been created less than one month earlier from email address romean.brown21@gmail.com.

115. Thereafter, a new KeyBank debit card ending in 0092 (the “0092 KeyBank Card”) was issued in the name of Victim 21.

116. On or about January 24, 2021, at approximately 3:16 p.m., BROWN used the 0092 KeyBank Card in Victim 21’s name to withdraw approximately \$1,000.00 from a certain ATM in Redding, Connecticut. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of BROWN from law enforcement databases and publicly-available social media postings, I believe that the individual depicted in the photograph is BROWN:



Below is a photograph from a publicly-available social media post of BROWN, in which BROWN is wearing the same outfit:



117. According to the NYS-DOL, the actual loss associated with the claim in Victim 21's name is approximately \$15,006.00.

ii. Additional Claims Connected to BROWN

118. On or about August 5, 2020, BROWN posted the following messages to his publicly-accessible Facebook account: "Should I make a new tele chat ?? Drop all the waves rn ! Shit is too easy." Based on my training, experience, and investigation of this case to date, I believe that "a new tele chat" refers to a new Telegram chat, and that BROWN was referring to the use of Telegram to discuss fraudulent schemes ("waves"). Among other replies, Facebook user "Keith Mula" responded by listing his username. According to records provided by Facebook, Facebook user "Keith Mula" is associated with the 0842 Phone Number, which belongs to KEITH JAMES for the reasons discussed above. Thus, I have probable cause to believe that JAMES accepted BROWN's invitation to discuss the fraudulent scheme described herein over Telegram.

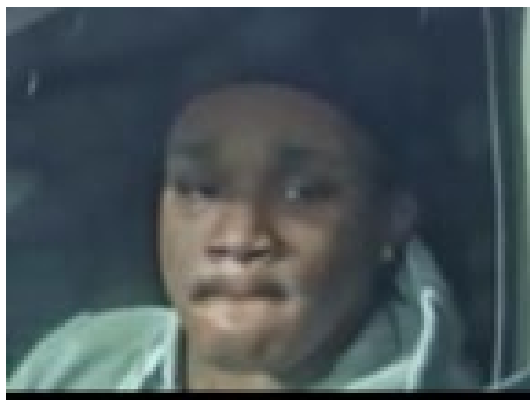
K. STEPHAN DORMINVIL

i. Claim in the Name of Victim 22

119. NYS-DOL records show that an unemployment insurance claim was filed in the name of Victim 22 on or about December 18, 2020. The application used the true name, date of birth, and social security number of Victim 22 but listed a certain address on Winthrop Street in Brooklyn, New York as Victim 22's mailing address.

120. With respect to the claim filed in Victim 22's name, a KeyBank debit card ending in 9415 (the "9415 KeyBank Card") was issued in the name of Victim 22.

121. On or about March 1, 2021, at approximately 3:14 p.m., DORMINVIL used the 9415 KeyBank Card in Victim 22's name to withdraw approximately \$480.00 from a certain ATM in Brooklyn, New York. Below is a still image from video surveillance for that ATM transaction; based on my investigation of this case to date, including my review of photographs of DORMINVIL from law enforcement databases and publicly-available social media postings, I believe that the individual depicted in the photograph is DORMINVIL:



122. According to the NYS-DOL, the actual loss associated with the claim in Victim 22's name is approximately \$25,074.00.

ii. Additional Claims Connected to DORMINVIL, Including Claim in the Name of Victim 23

123. On or about March 21, 2021, at approximately 12:35 p.m., the claim in the name of Victim 22 was certified from an IP address ending in 253.44 (the “253.44 IP Address”). According to records from CSC Holdings, LLC, the 253.44 IP Address is subscribed in the name of an individual believed to be DORMINVIL’s girlfriend at a certain address on Sterling Place in Brooklyn, New York (the “Sterling Place Address”), with telephone number ending in -0575 (the “0575 Phone Number”).¹¹

124. According to NYS-DOL records, approximately sixteen separate unemployment insurance claims in names other than DORMINVIL’s were accessed from the 253.44 IP Address, including the above-described claim in the name of Victim 22. Claims filed in the names of DORMINVIL and DORMINVIL’s girlfriend were also accessed from the 253.44 IP Address.

125. According to NYS-DOL records, approximately six separate unemployment insurance claims in names other than DORMINVIL’s used the Sterling Place Addresses as the mailing address.

126. According to NYS-DOL records, an unemployment insurance claim in DORMINVIL’s own name was filed on or about April 24, 2021, from the 253.44 IP

¹¹ Based on my review of certain NYPD reports, I know that this address and telephone number are associated with DORMINVIL’s girlfriend because she filed a complaint against DORMINVIL with the NYPD on or about March 31, 2021, and provided the Sterling Place Address as her address and the 0575 Phone Number as her telephone number.

Address. The claim listed a certain apartment on Covert Street in Brooklyn, New York (the “Covert Street Address”) as the mailing address.

127. NYS-DOL records show that an unemployment insurance claim was filed in the name of another New York resident (“Victim 23”) on or about November 28, 2020. The application used the true name, date of birth, and social security number of Victim 23 but listed the Covert Street Address as Victim 23’s mailing address.

128. NYS-DOL records also show that this claim in the name of Victim 23 was accessed from the .207 IP Address, which is the IP address linked to JEAN PIERRE’s address.

L. SOCIAL MEDIA EVIDENCE AND WOO GANG AFFILIATION

129. Photographs and videos of the defendants posted on publicly-accessible social media pages show them (a) expressing their allegiance to the Woo street gang through hand signs and other means, and (b) flaunting their ill-gotten gains by displaying large stacks of United States currency and standing near luxury vehicles.

130. Several of the defendants appeared in a music video entitled “Trappin,” which was posted to YouTube on or about May 8, 2021, and which I have reviewed.

131. Specifically, the defendants JEAN PIERRE, SMITH, TOPEY, DESIR, and MARKS all participated in the music video. Below are still images from the music video showing each of them:



JEAN PIERRE



SMITH



TOPEY



DESIR



MARKS

132. The lyrics of the song include the following: “It was me and Porter, we was huggin’ the block. Unemployment got us workin’ a lot.” Based on my training, experience, and investigation of this case, I believe that “Porter” refers to JEAN PIERRE because, among other things, JEAN PIERRE uses the name “Porter B” in music videos, and his cellular telephones are associated with email addresses porterbaby80z@icloud.com and porterbaby12@icloud.com and Telegram user name “Chris Porter.” I believe that the lyrics “unemployment got us workin’ a lot” refer to the above-described fraudulent scheme.

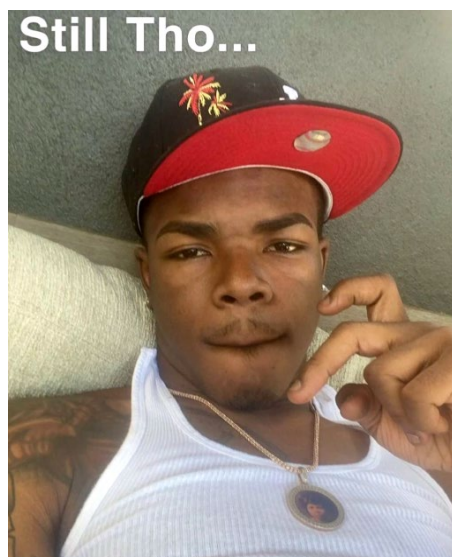
133. Additionally, below are publicly-accessible social media photographs of ROMEAN BROWN. In the first photograph, BROWN is holding a large stack of United States currency. In the second photograph, BROWN is making the letter “W” with his left hand. Based on my training, experience, and investigation of this case to date, I know that members of the Woo street gang use this hand sign to indicate their affiliation with the Woo street gang (the “W” stands for “Woo”).



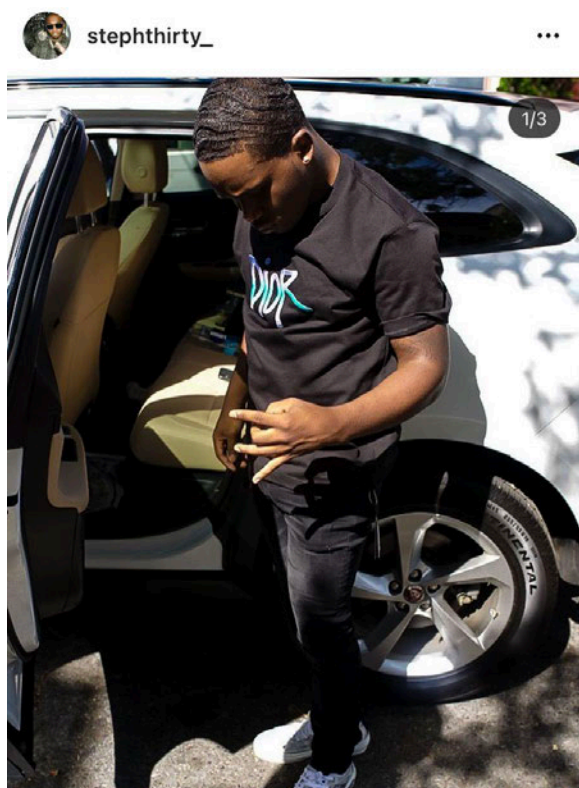
134. Below are publicly-accessible social media photographs relating to TYREK CLARKE. In the first photograph, CLARKE (using the user name “trey_woo”) posted a photograph of a large amount of United States currency. In the second photograph, CLARKE is making the Woo street gang sign (“W”) with his right hand while sitting on a BMW 7 series vehicle.



135. Below are publicly-accessible social media photographs of KENNITH DESIR. In the first photograph, DESIR is standing in front of a Maybach vehicle. In the second photograph, DESIR is making a hand sign that, based on my training and experience, I recognize to be “dropping rakes,” which is a gesture intended to show disrespect to the Gangster Disciples street gang. Based on my training and experience, I know that the Gangster Disciples street gang are a rival gang of the Woo street gang.



136. Below are publicly-accessible social media photographs of STEPHAN DORMINVIL. In the first photograph, DORMINVIL is standing in front of a Jaguar vehicle. In the second photograph, DORMINVIL is making the Woo street gang sign (“W”) with his left hand.



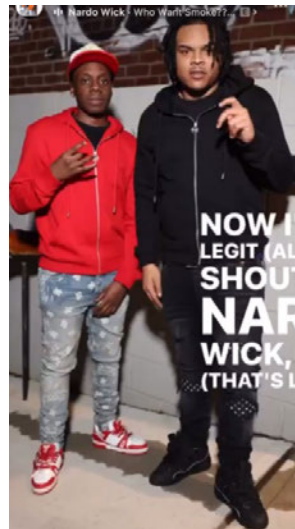
137. Below is a publicly-accessible social media photograph of KAI HEYWARD holding a large stack of United States currency.



138. Below are publicly-accessible social media photographs of KEITH JAMES. In the first photograph, JAMES is holding a large stack of United States currency with the caption “Happy Wooday To My Fucking Blood Brother Anything Go Up For You.” Based on my training and experience, I believe that “Wooday” is a reference to the Woo street gang. In the second photograph, JAMES is making the Woo street gang sign (“W”) with both hands.



139. Below are publicly-accessible social media photographs of ONEAL MARKS. In the first photograph, MARKS is sitting on top of a Lamborghini vehicle. In the second photograph, MARKS (left) is standing next to SMITH (right). MARKS is making the Woo street gang sign (“W”) with his right hand, and SMITH is “dropping the rake” with his left hand.



140. Below are publicly-accessible social media photographs of JAHRIAH OLIVIERRE. In the first photograph, OLIVIERRE is displaying a large stack of United States currency. In the second photograph, OLIVIERRE is making the Woo street gang sign (“W”) with his right hand.



141. Below are publicly-accessible social media photographs of CHRISTOPHER JEAN PIERRE. In the first photograph, JEAN PIERRE is displaying a large stack of United States currency. In the second photograph, JEAN PIERRE (left) is making the Woo street gang sign (“W”) with both hands.



142. Below are publicly-accessible social media photographs of ROLEEKE SMITH. In the first photograph, SMITH is displaying a large stack of United States currency while holding a Saks Fifth Avenue shopping bag. In the second photograph,

SMITH is “dropping the rake” with his right hand and holding a large stack of United States currency in his left hand.



143. Below is a publicly-accessible photograph of CHRISTOPHER TOPEY “dropping the rake” with both hands.



144. Below is a publicly-accessible social media photograph showing multiple individuals, including STEPHAN DORMINVIL, KAI HEYWARD, KEITH

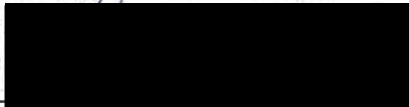
JAMES, CHRISTOPHER JEAN PIERRE, JAHRIAH OLIVIERRE, ROLEEKE SMITH, and CHRISTOPHER TOPEY. DORMINVIL and JEAN PIERRE are making the Woo street gang's "W" hand sign, and HEYWARD, JAMES, OLIVIERRE, SMITH, and TOPEY are "dropping the rake." Moreover, based on my training, experience, and investigation of this case to date, I believe that the "FREE DAFI" message on the t-shirts is a reference to Khadafi "Dafi" Julio, who was arrested by the NYPD on or about August 13, 2020, for criminal possession of a weapon. Based on my training, experience, and investigation of this case to date, I know that Khadafi "Dafi" Julio is believed to be a member of the Woo gang from the Canarsie neighborhood of Brooklyn, whose rap name is "Dafi Woo."



III. Conclusion and Request for Sealing


145. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrants. All defendants are currently at liberty. I believe that sealing these documents is necessary to preserve the integrity of this ongoing criminal investigation. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the Internet. Therefore, premature disclosure of this affidavit and related documents may seriously jeopardize the investigation, including by giving targets an opportunity to flee from prosecution, destroy or tamper with evidence, and change patterns of behavior.

WHEREFORE, your deponent respectfully requests that arrest warrants be issued for the defendants ROMEAN BROWN, TYREK CLARKE, KENNITH DESIR, STEPHAN DORMINVIL, KAI HEYWARD, KEITH JAMES, CHRISTOPHER JEAN PIERRE, ONEAL MARKS, JAHRIAH OLIVIERRE, ROLEEKE SMITH and CHRISTOPHER TOPEY so that they may be dealt with according to law.


 JAMES WOODS
 Special Agent
 United States Department of Labor

Sworn to before me this
14 day of February, 2022

Sworn via Telephone



 THE HONORABLE SANKET J. BULSARA
 UNITED STATES MAGISTRATE JUDGE
 EASTERN DISTRICT OF NEW YORK