

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. *8:21-cr-283-KKM-AEP*

KEAUJAY HORNSBY,  
a/k/a "Plug"  
KAREEM SPANN,  
a/k/a "Reem,"  
TYWON SPANN,  
a/k/a "Weez," and  
ERIAIUS BENTLEY

18 U.S.C. § 1962(d)  
18 U.S.C. § 1959  
18 U.S.C. § 924(c)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 371  
18 U.S.C. § 1029  
18 U.S.C. § 1028A

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**  
**(RICO Conspiracy)**

**A. The Enterprise**

1. At various times relevant to this Indictment, the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG,"  
KAREEM SPANN,  
a/k/a "REEM," and  
TYWON SPANN,  
a/k/a "WEEZ,"

together with others known and unknown, were members and associates of a group referred to as "Robles Park," a criminal organization whose members and associates

engaged in acts involving murder, assault, intimidation, narcotics trafficking, access device fraud, identity theft, obstruction of justice, and other crimes. Robles Park operated principally in the Middle District of Florida.

2. Robles Park, including its leadership, membership, and associates, constituted an “enterprise,” as defined in 18 U.S.C. §§ 1961(4) and 1959(b)(2) (hereinafter, “the Enterprise”), that is, a group of individuals associated in fact, although not a legal entity, that was engaged in and the activities of which affected interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

**B. Purposes of the Enterprise**

3. The purposes of the Enterprise included:
- a. Enriching the members and associates of the Enterprise through, among other things, identity theft, access device fraud, wire fraud, and narcotics trafficking.
  - b. Protecting and increasing the power, territory, and profits of the Enterprise through criminal activity, intimidation, violence, and threats of violence.
  - c. Promoting and enhancing the reputation of the Enterprise and its members and associates.
  - d. Keeping victims in fear of the Enterprise through violence and threats of violence.

e. Protecting Enterprise members by concealing, destroying evidence of, and tampering with witnesses to, its illegal activities.

**C. Means and Methods of the Enterprise**

4. Among the means and methods by which the members of the Enterprise and their associates agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

a. Members of the Enterprise and their associates would and did commit, conspire to commit, attempt to commit, and threaten to commit acts of violence, to protect and expand the Enterprise's criminal operations, and to intimidate witnesses and rivals, including members of the West Tampa neighborhood gang;

b. Members of the Enterprise and their associates would and did use interstate wire and electronic communications to promote and conduct the affairs of the Enterprise;

c. Members of the Enterprise and their associates would and did use vehicles, cellphones, and the internet to promote and conduct the affairs of the Enterprise.

d. Members of the Enterprise would and did acquire and share firearms to promote and conduct the affairs of the Enterprise.

e. Members of the Enterprise and their associates would and did traffic in the personally identifiable information (PII) of other persons, fraudulently obtained funds, and controlled substances, including marijuana and cocaine.

**D. Racketeering Conspiracy**

5. From an unknown date no later than on or about March 8, 2014, continuing through and including the date of this Indictment, in the Middle District of Florida and elsewhere, the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG"  
KAREEM SPANN,  
a/k/a "REEM," and  
TYWON SPANN,  
a/k/a "WEEZ,"

together with others known and unknown, being persons employed by and associated with the Robles Park Enterprise described in paragraphs One through Four of this Indictment, which Enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly, willfully, and unlawfully conspired with persons, both known and unknown to the Grand Jury, to violate 18 U.S.C. § 1962(c); that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity.

**E. Pattern of Racketeering Activity**

6. The pattern of racketeering activity, as defined in 18 U.S.C. §§ 1961(1) and (5), through which the defendants and their co-conspirators agreed to conduct and participate in the conduct of the affairs of the Enterprise, consisted of multiple:

- a. acts involving murder in violation of Sections 782.04, 777.011, and 777.04 of the Florida Statutes;

acts indictable under the following provisions of federal law:

- b. 18 U.S.C. § 1029 (relating to access device fraud);
- c. 18 U.S.C. § 1343 (relating to wire fraud);
- d. 18 U.S.C. § 1503 (relating to obstructing justice); and
- e. 18 U.S.C. § 1512 (relating to tampering with witnesses, victims, or informants);

and offenses involving the felonious manufacture, receiving, concealment, buying, selling, and otherwise dealing in controlled substances or listed chemicals, in

violation of:

- f. 21 U.S.C. § 841 (distributing and possessing with intent to distribute controlled substances);
- g. 21 U.S.C. § 846 (conspiracy and attempt to distribute and possess with intent to distribute controlled substances); and
- h. 21 U.S.C. § 856 (maintaining a drug premises).

7. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

#### **F. Overt Acts**

8. In furtherance of the conspiracy and to accomplish the objects of the conspiracy, the defendants and other Enterprise members committed, within the Middle District of Florida and elsewhere, the following Overt Acts, among others:

a. From an unknown date, beginning no later than on or about March 8, 2014, up to and including the date of this Indictment, the defendants, KEAUJAY HORNSBY, a/k/a “PLUG,” KAREEM SPANN, a/k/a “REEM,” and TYWON SPANN, a/k/a “WEEZ,” and other Enterprise members and associates did knowingly and intentionally distribute controlled substances, including cocaine and marijuana.

b. From an unknown date, up to and including on or about January 5, 2021, the defendants, KEAUJAY HORNSBY, a/k/a “PLUG,” KAREEM SPANN, a/k/a “REEM,” and TYWON SPANN, a/k/a “WEEZ,” and other Enterprise members and associates did knowingly rent, lease, use, and maintain a premises located at 803 E. Lake Avenue, Unit 4, in Tampa, Florida, for the purpose of using and distributing controlled substances, including cocaine and marijuana.

c. From an unknown date no later than in or around June 2020, and continuing through at least in or around January 2021, the defendants, KEAUJAY HORNSBY, a/k/a “PLUG,” KAREEM SPANN, a/k/a “REEM,” and TYWON SPANN, a/k/a “WEEZ,” and other Enterprise members and associates did fraudulently obtain unemployment benefits to which they were not entitled from multiple states by producing, using, and trafficking in multiple counterfeit access devices, by committing wire fraud, and by committing identity theft.

d. On or about June 23, 2020, the defendant, KEAUJAY HORNSBY, a/k/a “PLUG,” knowing he was a convicted felon, possessed a firearm and

published evidence of his possession of that firearm on social media, to project the strength of the Enterprise and intimidate rivals.

e. In or around June 2020, the defendant KEAUJAY HORNSBY, a/k/a “PLUG,” and other Enterprise Members and associates publicly assaulted a rival gang member in response to an attack on defendant HORNSBY’s reputation.

f. On or about July 19, 2020, outside the Truth Lounge in Tampa Florida, the defendant, KEAUJAY HORNSBY, a/k/a “PLUG,” aided and abetted by the defendant KAREEM SPANN, a/k/a “REEM,” and other Enterprise members and associates, shot at several rival gang members and other persons.

g. On or about July 25, 2020, at International Plaza in Tampa, Florida, the defendants KEAUJAY HORNSBY, a/k/a “PLUG,” and KAREEM SPANN, a/k/a “REEM,” assisted each other in shooting at rival gang members.

h. From an unknown date no earlier than on or about October 8, 2020, up to and including the present, Enterprise Members and their associates threatened witnesses by publishing a \$50,000.00 reward for killing any witness who appeared in federal court against the defendants.

i. On or about January 5, 2021, the defendants KEAUJAY HORNSBY, a/k/a “PLUG,” and KAREEM SPANN, a/k/a “REEM,” and other Enterprise members and associates did knowingly and intentionally possess with intent to distribute cocaine and marijuana.

All in violation of 18 U.S.C. § 1962(d).

**COUNT TWO**

**(Assault with a Dangerous Weapon in Aid of Racketeering Activity)**

1. Paragraphs One through Four of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. Robles Park, through its members and associates, engaged in racketeering activity as defined in 18 U.S.C. §§ 1959(b)(1) and 1961(1), that is acts indictable under 18 U.S.C. § 1029 (relating to access device fraud); 18 U.S.C. § 1343 (relating to wire fraud); and offenses involving the felonious manufacture, receiving, concealment, buying, selling, and otherwise dealing in controlled substances or listed chemicals, in violation of: 21 U.S.C. § 841 (distributing and possessing with intent to distribute controlled substances); 21 U.S.C. § 846 (conspiracy and attempt to distribute and possess with intent to distribute controlled substances); and 21 U.S.C. § 856 (maintaining a drug premises).

3. On or about July 19, 2020, in the Middle District of Florida, the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG," and  
KAREEM SPANN,  
a/k/a "REEM,"

while aiding and abetting each other, and for the purpose of gaining entrance to and maintaining and increasing position in Robles Park, an enterprise engaged in racketeering activity, unlawfully and knowingly committed an assault with a



dangerous weapon by shooting at rival gang members and others, in violation of Fla. Stat. §§ 784.021, 777.011, and 784.045.

In violation of 18 U.S.C. §§ 1959(a)(3) and 2.

**COUNT THREE**  
**(Use of a Firearm During and in Relation to a Crime of Violence)**

On or about July 19, 2020, in the Middle District of Florida, the defendants,

KEAUJAY HORNSBY,  
a/k/a “PLUG,” and  
KAREEM SPANN,  
a/k/a “REEM,”

while aiding and abetting each other, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, Assault with a Dangerous Weapon in Aid of Racketeering Activity, as charged in Count Two of this Indictment, which Count is realleged and incorporated by reference as though fully set forth herein.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(iii) and 2.

**COUNT FOUR**  
**(Assault with a Dangerous Weapon in Aid of Racketeering Activity)**

1. Paragraphs One through Four of Count One and Paragraph Two of Count Two of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about July 25, 2020, in the Middle District of Florida, the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG," and  
KAREEM SPANN,  
a/k/a "REEM,"

while aiding and abetting each other, and for the purpose of gaining entrance to and maintaining and increasing position in Robles Park, an enterprise engaged in racketeering activity, unlawfully and knowingly committed an assault with a dangerous weapon by shooting at rival gang members, in violation of Fla. Stat. §§ 784.021, 777.011, and 784.045.

In violation of 18 U.S.C. §§ 1959(a)(3) and 2.

**COUNT FIVE**  
**(Use of a Firearm During and in Relation to a Crime of Violence)**

On or about July 25, 2020, in the Middle District of Florida, the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG," and  
KAREEM SPANN,  
a/k/a "REEM,"

while aiding and abetting each other, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, Assault with a Dangerous Weapon in Aid of Racketeering Activity, as charged in Count Four of this Indictment, which Count is realleged and incorporated by reference as though fully set forth herein.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(iii) and 2.

**COUNT SIX**  
**(Felon in Possession of Ammunition)**

On or about July 25, 2020, in the Middle District of Florida, the defendant,

KAREEM SPANN,  
a/k/a "REEM,"

while aided and abetted by another, knowing he had been previously convicted in any court of a crime punishable by imprisonment for a term exceeding one year, including:

- a. **Theft of Government Funds**, on or about January 28, 2016;
- b. **Aggravated Identity Theft**, on or about January 28, 2016;
- c. **Delivery of Cocaine within 1000 Feet of a School**, on or about February 9, 2017;
- d. **Possession of Cocaine**, on or about February 9, 2017;
- e. **Delivery of Cannabis within 1000 Feet of a School**, on or about February 9, 2017; and
- f. **Delivery of Cannabis within 1000 Feet of a Park**, on or about February 9, 2017;

did knowingly possess, in and affecting interstate and foreign commerce, ammunition.

In violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 2.

**COUNT SEVEN**  
**(Conspiracy)**

**A. Introduction**

At all times material to this Indictment:

1. The defendants, KEUJAY HORNSBY, a/k/a “PLUG,” KAREEM SPANN, a/k/a “REEM,” TYWON SPANN, a/k/a “WEEZ,” and ERLAIUS BENTLEY, resided in the Middle District of Florida, in the Robles Park area of Tampa, Florida.

2. Unemployment Insurance (UI) was a state-federal program that provided monetary benefits to eligible lawful workers. Although state workforce agencies (SWAs) administered their respective UI programs, they did so in accordance with federal laws and regulations. UI payments (benefits) were intended to provide temporary financial assistance to lawful workers who were unemployed through no fault of their own. Each state set its own additional requirements for eligibility, benefit amounts, and length of time benefits were paid. Generally, UI weekly benefit amounts were based on a percentage of one’s earnings over a base period.

3. In Arizona, the Arizona Department of Economic Security (ADES) administered the UI program.

4. In California, the California Employment Development Department (CEDD) administered the UI program.

5. In Nevada, the Nevada Department of Employment, Training and Rehabilitation (NDETR) administered the UI program.

6. In Pennsylvania, the Pennsylvania Department of Labor and Industry (PDLI) administered the UI program.

7. Financial Institution #1 was a financial institution, as defined in 18 U.S.C. § 20, headquartered in Minneapolis, Minnesota, and its deposits were insured by the Federal Deposit Insurance Corporation (FDIC). PDLI made UI benefit payments to UI claimants via Financial Institution #1 debit cards.

8. Financial Institution #2 was a financial institution, as defined in 18 U.S.C. § 20, headquartered in Charlotte, North Carolina, and its deposits were insured by the FDIC. ADES, CEDD, and NDETR made UI benefit payments to UI claimants via Financial Institution #2 debit cards.

9. In March 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. The Coronavirus Aid, Relief, and Economic Security (CARES) Act was also signed into law in March 2020. It expanded states' ability to provide UI benefits for many workers impacted by COVID-19, including workers who were not ordinarily eligible for UI benefits. The CARES Act provided for three new UI programs: Pandemic Unemployment Assistance, Federal Pandemic Unemployment Compensation, and Pandemic Emergency Unemployment Compensation.

10. The term "access device" included any card, plate, code, account number, electronic serial number, mobile identification number, personal identification number, or other telecommunications service, equipment, or

instrument identifier, or other means of account access that could be used alone or in conjunction with another access device to obtain money, goods, services, or any other thing of value, or that could be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument).

11. A credit card or debit card was an “access device.” A credit card was a thin plastic card, usually 3-1/8 inches by 2-1/8 inches that contained identification information and authorized the person named on the card to make charges for which he or she was billed periodically by the card issuer. A debit card looked like and generally contained the same information as a credit card, but immediately withdrew the money from the card holder's affiliated bank account.

12. Each credit or debit card account had a unique number issued to it. A credit card or debit card account number was also an “access device.” Credit or debit card issuers, such as Financial Institution #1 and Financial Institution #2, and some federally insured banks and credit unions, placed personal information on each card by physically stamping or embossing information such as the account number, the account holder's name, and the expiration date for the account. Credit or debit card issuers and financial institutions also programmed the magnetic strip on the back of the card with the account holder's name and account number, and the expiration date for the account.

13. The term “counterfeit access device” included any access device, including a credit card, debit card, credit card number, or debit card number that was

counterfeit, fictitious, altered, or forged, or an identifiable component of an access device or a counterfeit access device.

14. The term “unauthorized access device” included any access device, including a credit card, debit card, credit card number, or debit card number that was lost, stolen, expired, revoked, canceled, or obtained with the intent to defraud.

15. The term “means of identification” included any name or number that could be used, alone or in conjunction with any other information, to identify a specific individual, including any access device. A credit card or debit card number was a means of identification.

#### **B. The Conspiracy**

16. From an unknown date, beginning no later than in or around June 2020, and continuing up through and including the date of this indictment, in the Middle District of Florida, and elsewhere, the defendants,

KEAUJAY HORNSBY,  
a/k/a “PLUG,”  
KAREEM SPANN,  
a/k/a “REEM,”  
TYWON SPANN,  
a/k/a “WEEZ,” and  
ERIAIUS BENTLEY,

did knowingly and willfully combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to commit an offense against the United States, that is:

- a. access device fraud, in violation of 18 U.S.C. § 1029(a); and

- b. aggravated identity theft, in violation of 18 U.S.C. § 1028A.

**C. Manner and Means of the Conspiracy**

17. The manner and means by which the defendants and others sought to accomplish the objects of the conspiracy included, among others:

- a. It was part of the conspiracy that the conspirators would and did obtain PII of other persons (the “PII Victims”), without said persons’ knowledge or consent.

- b. It was further part of conspiracy that the conspirators would and did submit false and fraudulent UI claims to various state agencies for UI benefits using, without lawful authority, the PII Victims’ names, Social Security Numbers, and other information.

- c. It was further part of conspiracy that the conspirators would and did submit false and fraudulent UI claims in their own names to various state agencies for UI benefits using false information about their own residencies and employment histories.

- d. It was further part of the conspiracy that the conspirators would and did cause UI benefits to be transferred via interstate wire transmissions to bank accounts and onto debit cards issued in the names of persons, including PII Victims and themselves.

- e. It was further part of the conspiracy that the conspirators would and did use, and attempt to use, said debit cards loaded with UI benefits to withdraw



money from bank automated teller machines (ATMs) and to purchase items from retail establishments and share in the proceeds of their crimes.

f. It was further part of the conspiracy that the conspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose and objects of the conspiracy and the acts committed in furtherance thereof.

#### **D. Overt Acts**

18. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the Middle District of Florida, and elsewhere:

a. On or about August 12, 2020, at 8112 Tom Sawyer Drive in Tampa, Florida, defendants TYWON SPANN, a/k/a “WEEZ,” and ERIAIUS BENTLEY possessed 15 or more counterfeit or unauthorized access devices.

b. On or about September 22, 2020, at 8112 Tom Sawyer Drive in Tampa, Florida, defendants TYWON SPANN, a/k/a “WEEZ,” and ERIAIUS BENTLEY possessed 15 or more counterfeit or unauthorized access devices.

c. On or about October 20, 2020, PII and counterfeit or unauthorized access devices were recovered at 11613 Hammocks Glade Drive, the permanent residence of defendant KEAUJAY HORNSBY, a/k/a “PLUG,” and a coconspirator.

d. On or about January 5, 2021 at 803 East Lake Avenue, in Tampa, Florida, defendants KEAUJAY HORBSBY, a/k/a “PLUG,” and KAREEM SPANN, a/k/a REEM,” and others, possessed multiple counterfeit or unauthorized access devices.

e. On or about the dates set forth below, each of which constitutes a separate overt act, the identified coconspirator, alone and together with others known and unknown to the Grand Jury, used and attempted to use the unauthorized or counterfeit access device identified below, issued to the account holder victims listed below, to engage in the transaction described below, without the account holder’s knowledge or consent:

OVERT ACT	DATE	CONSPIRATOR(S)	VICTIM	ACCESS DEVICE	TRANSACTION INFORMATION
e.1	7/27/2020	TYWON SPANN	F.G.	Financial Institution #1 debit card ending in - 9965	\$1003.00 ATM withdrawal
e.2	7/28/2020	KEAUJAY HORNSBY and TYWON SPANN	F.G.	Financial Institution #1 debit card ending in - 9965	\$1003.00 ATM withdrawal
e.3	7/28/2020	KEAUJAY HORNSBY and TYWON SPANN	A.S.1	Financial Institution #1 debit card ending in - 6081	\$1003.00 ATM withdrawal

OVERT ACT	DATE	CONSPIRATOR(S)	VICTIM	ACCESS DEVICE	TRANSACTION INFORMATION
e.4	7/28/2020	KEAUJAY HORNSBY and TYWON SPANN	J.C.	Financial Institution #1 debit card ending in - 5633	\$1003.00 ATM withdrawal
e.5	7/28/2020	KEAUJAY HORNSBY and TYWON SPANN	A.G.	Financial Institution #1 debit card ending in - 4335	\$1003.00 ATM withdrawal
e.6	7/28/2020	KEAUJAY HORNSBY and TYWON SPANN	S.J.	Financial Institution #2 debit card ending in - 2529	\$1000.00 ATM withdrawal
e.7	7/29/2020	TYWON SPANN	F.G.	Financial Institution #1 debit card ending in - 9965	\$1003.00 ATM withdrawal
e.8	7/31/2020	KAREEM SPANN and TYWON SPANN	F.G.	Financial Institution #1 debit card ending in - 9965	\$1003.00 ATM withdrawal
e.9	7/31/2020	KAREEM SPANN and TYWON SPANN	A.S.1	Financial Institution #1 debit card ending in - 6081	\$1003.00 ATM withdrawal
e.10	7/31/2020	KAREEM SPANN and	J.C.	Financial Institution	\$1003.00 ATM withdrawal

OVERT ACT	DATE	CONSPIRATOR(S)	VICTIM	ACCESS DEVICE	TRANSACTION INFORMATION
		TYWON SPANN		#1 debit card ending in - 5633	
<b>e.11</b>	7/31/2020	KAREEM SPANN and TYWON SPANN	A.G.	Financial Institution #1 debit card ending in - 4335	\$1003.00 ATM withdrawal
<b>e.12</b>	7/31/2020	KAREEM SPANN and TYWON SPANN	A.P.	Financial Institution #1 debit card ending in - 8690	\$1003.00 ATM withdrawal
<b>e.13</b>	7/31/2020	KAREEM SPANN and TYWON SPANN	S.J.	Financial Institution #2 debit card ending in - 2529	\$1000.00 ATM withdrawal
<b>e.14</b>	7/31/2020	KAREEM SPANN and TYWON SPANN	J.B.	Financial Institution #2 debit card ending in - 9644	\$1000.00 ATM withdrawal
<b>e.15</b>	8/1/2020	TYWON SPANN	F.G.	Financial Institution #1 debit card ending in - 9965	\$1003.00 ATM withdrawal
<b>e.16</b>	8/4/2020	TYWON SPANN	F.G.	Financial Institution #1 debit	\$1003.00 ATM withdrawal

OVERT ACT	DATE	CONSPIRATOR(S)	VICTIM	ACCESS DEVICE	TRANSACTION INFORMATION
				card ending in - 9965	
e.17	8/4/2020	TYWON SPANN	A.S.2	Financial Institution #1 debit card ending in - 6594	\$1003.00 ATM withdrawal
e.18	8/5/2020	TYWON SPANN	F.G.	Financial Institution #1 debit card ending in - 9965	\$1003.00 ATM withdrawal
e.19	8/5/2020	KEAUJAY HORBSBY	A.S.2	Financial Institution #1 debit card ending in - 6594	\$1003.00 ATM withdrawal
e.20	8/7/2020	TYWON SPANN	A.S.2	Financial Institution #1 debit card ending in - 6594	\$1003.00 ATM withdrawal
e.21	8/9/2020	TYWON SPANN	A.S.2	Financial Institution #1 debit card ending in - 6594	\$1003.00 ATM withdrawal
e.22	8/10/2020	TYWON SPANN	A.S.2	Financial Institution #1 debit card	\$1003.00 ATM withdrawal

OVERT ACT	DATE	CONSPIRATOR(S)	VICTIM	ACCESS DEVICE	TRANSACTION INFORMATION
				ending in - 6594	
e.23	8/11/2020	TYWON SPANN	A.S.2	Financial Institution #1 debit card ending in - 6594	\$1003.00 ATM withdrawal
e.24	8/15/2020	ERIAIUS BENTLEY	J.B.	Financial Institution #2 debit card ending in - 6335	\$1000.00 ATM withdrawal
e.25	8/16/2020	ERIAIUS BENTLEY	J.B.	Financial Institution #2 debit card ending in - 6335	\$500.00 ATM withdrawal

All in violation of 18 U.S.C. § 371.

**COUNTS EIGHT AND NINE**  
**(Access Device Fraud)**

1. The allegations contained in paragraphs 1 through 15 of Count Seven of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about the date listed below in each Count, in the Middle District of Florida and elsewhere, the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG," and  
TYWON SPANN,

a/k/a "WEEZ,"

aided and abetted by others, did knowingly and with intent to defraud traffic in and use an unauthorized access device during a one-year period, and by such conduct obtained anything of value aggregating \$1,000.00 or more during that period, said conduct affecting interstate and foreign commerce, as detailed below:

COUNT	DATE	VICTIM	ACCESS DEVICE	AMOUNT
EIGHT	7/28/2020	F.G.	Financial Institution #1 debit card ending in -9965	\$1003.00
NINE	7/28/2020	A.S.1	Financial Institution #1 debit card ending in -6081	\$1003.00

In violation of 18 U.S.C. §§ 1029(a)(2) and 2.

**COUNTS TEN AND ELEVEN**  
**(Access Device Fraud)**

1. The allegations contained in paragraphs 1 through 15 of Count Seven of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about the date listed below in each Count, in the Middle District of Florida and elsewhere, the defendants,

KAREEM SPANN,  
a/k/a "REEM," and  
TYWON SPANN,  
a/k/a "WEEZ,"

aided and abetted by others, did knowingly and with intent to defraud traffic in and use an unauthorized access device during a one-year period, and by such conduct

obtained anything of value aggregating \$1,000.00 or more during that period, said conduct affecting interstate and foreign commerce, as detailed below:

COUNT	DATE	VICTIM	ACCESS DEVICE	AMOUNT
TEN	7/31/2020	F.G.	Financial Institution #1 debit card ending in -9965	\$1003.00 withdrawal
ELEVEN	7/31/2020	A.S.1	Financial Institution #1 debit card ending in -6081	\$1003.00 withdrawal

In violation of 18 U.S.C. §§ 1029(a)(2) and 2.

**COUNT TWELVE**  
**(Access Device Fraud)**

1. The allegations contained in paragraphs 1 through 15 of Count Seven of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about August 12, 2020, in the Middle District of Florida, the defendants,

TYWON SPANN,  
a/k/a "WEEZ," and  
ERIAIUS BENTLEY,

while aiding and abetting each other and others, did knowingly and with the intent to defraud possess fifteen or more unauthorized access devices, as defined in 18 U.S.C. § 1029(e), that is, debit cards, debit card account numbers, credit cards, credit card account numbers, and PII, said possession affecting interstate and foreign commerce.

In violation of 18 U.S.C. §§ 1029(a)(3), (c)(1)(A)(i), and 2.



**COUNT THIRTEEN**  
**(Access Device Fraud)**

1. The allegations contained in paragraphs 1 through 15 of Count Seven of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about September 22, 2020, in the Middle District of Florida and elsewhere, the defendants,

TYWON SPANN,  
a/k/a "WEEZ," and  
ERIAIUS BENTLEY,

while aiding and abetting each other and others, known and unknown to the Grand Jury, did knowingly and with the intent to defraud, possess fifteen or more unauthorized access devices, as defined in 18 U.S.C. § 1029(e), that is, debit cards, debit card account numbers, credit cards, credit card account numbers, social security numbers, and other PII, said possession affecting interstate and foreign commerce.

In violation of 18 U.S.C. §§ 1029(a)(3), (c)(1)(A)(i), and 2.

**COUNT FOURTEEN**  
**(Aggravated Identity Theft)**

1. The allegations contained in paragraphs 1 through 15 of Count Seven of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. In or around July 2020, in the Middle District of Florida, and elsewhere, the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG,"

KAREEM SPANN,  
a/k/a "REEM,"  
TYWON SPANN,  
a/k/a "WEEZ," and  
ERIAIUS BENTLEY,

while aiding and abetting each other and others, did knowingly possess and use without lawful authority, a means of identification of another person, specifically, the debit card in the name of F.G. ending in -9965, during and in relation to a federal violation of 18 U.S.C. § 1029(a)(2) (access device fraud) as charged in Counts Eight and Ten of this Indictment, knowing that such means of identification belonged to an actual person.

In violation of 18 U.S.C. §§ 1028A and 2.

**FORFEITURE**

1. The allegations contained in Counts One through Thirteen of the Indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 1963, 982(a)(2)(B), and 1029(c)(1)(C).

2. Upon conviction of a violation of 18 U.S.C. § 1962(d), the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG,"  
KAREEM SPANN,  
a/k/a "REEM," and  
TYWON SPANN,  
a/k/a "WEEZ,"

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 1963:

- a. any interest acquired or maintained in violation of section 1962;
- b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendant established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; and
- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of section 1962.

3. Upon conviction of a violation of 18 U.S.C. §§ 922 and/or 924(c), the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG," and  
KAREEM SPANN,  
a/k/a "REEM,"

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the violation.

4. Upon conviction of a violation of 18 U.S.C. § 1029, or a conspiracy to violate 18 U.S.C. § 1029, the defendants,

KEAUJAY HORNSBY,  
a/k/a "PLUG,"  
KAREEM SPANN,  
a/k/a "REEM,"  
TYWON SPANN,  
a/k/a "WEEZ," and  
ERIAIUS BENTLEY,

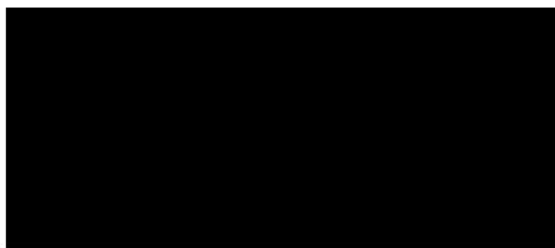
shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as a result of such violation, and pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property used or intended to be used to commit the offense.

5. The property to be forfeited includes, but is not limited to, an order of forfeiture in the amount of proceeds obtained from the offenses.

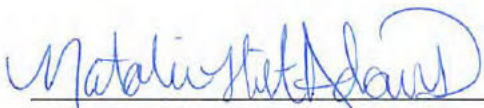
6. If any of the property described above, as a result of any acts or omissions of the defendant:

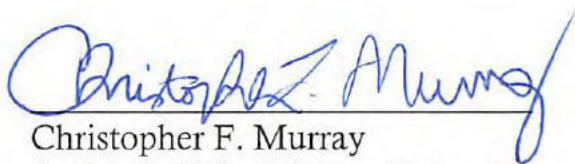
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property, which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 18 U.S.C. § 1963(m) and 21 U.S.C. § 853(p), directly and as incorporated by 28 U.S.C. § 2461(c) and 18 U.S.C. §§ 982(b)(1) and 1029(c)(2).



KARIN HOPPMANN  
Acting United States Attorney

By:   
Natalie Hirt Adams  
Assistant United States Attorney

By:   
Christopher F. Murray  
Assistant United States Attorney  
Chief, Violent Crimes and Narcotics Section

August 21

No.

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UNITED STATES DISTRICT COURT  
Middle District of Florida  
Tampa Division

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THE UNITED STATES OF AMERICA

vs.

KEAUJAY HORNSBY, a/k/a "Plug"  
KAREEM SPANN, a/k/a "Reem,"  
TYWON SPANN, a/k/a "Weez," and  
ERIAIUS BENTLEY

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INDICTMENT

Violations: 18 U.S.C. § 924(c)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 371  
18 U.S.C. § 1029  
18 U.S.C. § 1028A

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Filed in open court this 25<sup>th</sup> day  
of August, 2021.

\_\_\_\_\_  
Clerk

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Bail \$ \_\_\_\_\_