

SEALED

FILED

OCT 19 2023

Mark C. McCart, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

WYATT DOUGLAS MILLER,
KEVIN RAMSES ROCHA,
TYLER DEWAYNE ROGERS,
JONAH MAXWELL FESMAN,
ANTONIO ERNESTO MUNOZ,
JUAN MANUEL CAMACHO-
ZARATE,
CAMERON DAVID MARTIN,
ILYESS HADRI TALBI,
STEVEN LIN,
GILBERT IMMANUEL,

Defendants.

Case No. 23 CR 331 JFH

FILED UNDER SEAL

INDICTMENT

[18 U.S.C. § 1349 – Conspiracy to
Commit Wire Fraud;
Forfeiture Allegation: 18 U.S.C.
§§ 981(a)(1)(C) and 982(a)(2)(A),
and 28 U.S.C. § 2461—Fraud
Forfeiture]

THE GRAND JURY CHARGES:

Introductory Allegations

1. The defendants, WYATT DOUGLAS MILLER, KEVIN RAMSES ROCHA, TYLER DEWAYNE ROGERS, JONAH MAXWELL FESMAN, ANTONIO ERNESTO MUNOZ, JUAN MANUEL CAMACHO-ZARATE, CAMERON DAVID MARTIN, ILYESS HADRI TALBI, STEVEN LIN, and GILBERT IMMANUEL, and other persons known and unknown to the Grand Jury (collectively referred to as “the Artemis Refund Group” or “ARG”) developed a scheme to commit refund fraud against various retail outlets around the world. Refund fraud is a criminal enterprise by which complicit parties purchase an item,

have the purchase refunded, and, through various means, keep the refunded item for personal use or to sell for profit. The scheme included soliciting individuals to place online orders with retail outlets for high-end items for which ARG would then initiate a return and refund through various methods, including claiming the item either never arrived or arrived defective. Retailers would then provide a full refund. While the individuals who ordered the item were enabled to keep the item and receive a full refund, their agreement with ARG included a fee of 15%-20% of the purchase price. Effectively, ARG allowed the individuals to receive a high-end product for only 15%-20% of the list price. The Artemis Refund Group illegally profited 15%-20% of the price of every item refunded. There were thousands of items refunded.

2. The Artemis Refund Group collectively worked together using a Telegram channel along with shared cloud resources, such as online forms to accept orders and spreadsheets to track them. Members of ARG were given access to these resources in accordance with their role within the enterprise.

The Conspiracy and its Object

3. From at least on or about April 5, 2019, through the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the Artemis Refund Group, knowingly conspired to commit Wire Fraud, a violation of Title 18, United States Code, Section 1349, in the following manner:

The Purpose of the Conspiracy

4. It was the purpose of the Conspiracy to enrich ARG unlawfully by defrauding retailers through a scheme of online refund fraud, which utilized a variety of different techniques to deceive victim retailers into supplying full refunds for purchases in which the items were not returned.

The Manner and Means of the Conspiracy

5. ARG used the following manner and means, among others, to achieve the object of the Conspiracy:

6. It was part of the Conspiracy that ARG would use Telegram, a cloud-based instant messaging service that enabled ARG to send and receive end-to-end encrypted messages. A Telegram channel allowed users to disseminate messages to other Telegram users who subscribed to the channel. Telegram accounts have a username, also known as a handle, that identifies the user's account. Telegram handles are preceded by an "@" symbol. The screenshot below shows a point in time of the ARG Telegram channel, with the owner being an unindicted co-conspirator operating the Telegram handle "@vaelxn".

Group Info



Team Artemis Refund

1,383 members



t.me/teamartemis
Link

Trust the process.

owner: @vaeLxn

vouches: @vaeLxnrefvouches

workers:

@marypopz

Store: @artemislist

Description



Notifications



58 photos



1 file



3456 shared links



32 GIFs

7. It was further part of the Conspiracy that ARG would offer refund fraud services to the public on Telegram.

8. It was further part of the Conspiracy that ARG would recruit other individuals (the “Purchasers”) who subscribed to Telegram channels to purchase expensive items from victim retail companies. Once the purchase was made, ARG engaged in different methods to deceive the victim retailers into believing a refund should be generated and the purchased item was being returned when, in truth and fact, it had not been.

9. It was further part of the Conspiracy that ARG used several techniques to create fraudulent refunds which deceived the victim retail companies into issuing refunds through false and fraudulent material representations. For example:

- a. Mail-in Fraud: ARG (or the Purchasers at ARG's direction) requested a return authorization from the victim retailer for an item that has already been received. The victim retailer initiated the return and sent a return label, while simultaneously refunding the payment method on file. ARG would then send an empty package, or a package filled with some other item back to the retailer.
- b. Did Not Arrive (DNA)/Concession Fraud: ARG claimed that the item was not received and that the item was defective and caused the victim retailer to issue a refund.
- c. Fake Tracking Identification Number ("FTID") Fraud: Once the victim retailer provided a shipping label to facilitate the return, ARG would manipulate the shipping label provided to have the item sent to a different address. The victim retailer was notified that the item had shipped, but it never reached the retailer's location.

10. It was further part of the Conspiracy that the Purchasers completed an online form provided by ARG to initiate all fraudulent refunds. The form provided purchase details, that is, a store name, contact information for the order, order ID, and delivery status, as well as payment information for the refund. Below is a screenshot of the form utilized by ARG.

Have you received your products? *

Your answer

Courier and Tracking ID

Your answer

Order ID

Your answer

Account login details

Your answer

Package *

Not signed, handed to resident

Left at door

Fake signature

Real signature

Other

How did you pay for your order? *

If you used your Credit/Debit to pay, please include the last 4 digits

Your answer

11. It was further part of the Conspiracy that ARG entered into an agreement with the Purchasers whereby the Purchasers would receive the purchased item, keep it, and receive a full refund of the purchase price.

12. It was further part of the Conspiracy that Purchasers returned the completed form to ARG, who then inserted its data into a spreadsheet utilized by all ARG members to receive orders and initiate the refund process.

13. It was further part of the Conspiracy that, in exchange for ARG's assistance in the scheme, the Purchasers would pay ARG a percentage of the purchase price, thus receiving the item for only a fraction of its actual value.

14. It was further part of the conspiracy that the fees received by ARG would often be deposited into a Bitcoin wallet, which was then used by other members of ARG to collect their refund fraud fees.

15. It was further part of the Conspiracy that ARG would recruit employees of victim retailers who worked in the company's return division to facilitate the refund fraud.

16. It was further part of the Conspiracy that ARG shared methods with its users to enhance the process of refund fraud. For example, some un-indicted co-conspirators recruited insiders from the return department at Walmart. Other members of ARG would use the insiders recruited by the un-indicted co-conspirators for their own refund fraud.

17. It was further part of the scheme that many members of ARG would effectuate the refund fraud themselves using ARG's resources, including Telegram channels, insiders, and methods, to receive the items from victim retailers. These items were later sold on various selling platforms such as eBay and Mercari.

18. Thousands of Purchasers used ARG's refund scheme to benefit from ARG's knowledge, experience, and contacts in the refund fraud industry. In exchange for ARG's services and level of expertise, Purchasers paid between 15 and 20 percent of the refunded item's purchase price.

19. While victim retailers are numerous and worldwide, the totality of the conspiracy impacted victim retailers with significant financial losses over the course of the conspiracy. In just one example, Amazon has been able to ascertain that its

losses from the conspiracy were in excess of \$700,000. Other victim retailers estimate losses from refund fraud as well into the millions of dollars.

20. ARG co-conspirators handling customer support created the Telegram channel “@vaelsupport” (“VaelSupport”) to be used and shared by all ARG conspirators to facilitate refund fraud on Telegram by putting a Purchaser in contact with a member of ARG to begin the refund fraud process.

21. On February 22, 2023, upon the request of a Confidential Human Source (CHS) who contacted VaelSupport on Telegram, VaelSupport indicated that it would complete the fraudulent return once the CHS had made the purchase of a \$541.41 Kate Spade handbag.

22. On March 3, 2023, the CHS contacted VaelSupport via Telegram and advised that the handbag had been received. The CHS then filled out the form provided by ARG to initiate the refund fraud. VaelSupport indicated that they would be in contact with the CHS and that the refund would take a few days.

23. On March 13, 2023, the CHS received confirmation that the handbag had been refunded by the victim retailer. VaelSupport provided the CHS with a Bitcoin payment address ending in “sgywu.”

24. VaelSupport advised that the CHS owed VaelSupport 15 percent of the purchase price for the refund of the handbag.

25. The CHS subsequently sent payment to the address provided by VaelSupport.

26. On May 1, 2022, a refund order was placed for a Macbook Pro ordered from a victim retailer, Amazon. The name and address on the order sheet came back to an

individual and location in the Northern District of Oklahoma. Records provided by the victim retailer revealed an account created with the same email address, using the same physical address based in the Northern District of Oklahoma. The UPS tracking number corresponded to a delivery at the same physical address provided to ARG and contained in the Amazon account.

27. The table below provides an overview of the accounts controlled by ARG co-conspirators and overt acts taken by them in furtherance of the conspiracy. Because the actors in some instances used or obtained hundreds of email accounts in furtherance of the conspiracy, the list of accounts and acts is not exhaustive.

Defendant	Account(s)	Overt Act(s)
Wyatt Douglas Miller	lax.wyatt4@gmail.com unplayablehost@gmail.com unplayablehost10@gmail.com wyattsamazon760@gmail.com	Hosted "Artemis Dropshipping Log" which contained refund information; Obtained numerous emails used for refunding; Resold refunded merchandise on various marketplaces (e.g. eBay, Mercari); Extensive financial transactions with co-conspirators; Requested numerous FTIDs from "FTID" service offered by co-conspirators vaelxn and Gilbert Immanuel;
Antonio Ernesto Munoz	animuslearned@gmail.com antoniov32013@gmail.com duperdown@gmail.com metrikeagle@gmail.com saranness2108@gmail.com	Obtained numerous emails used for refunding; Arranged for mobile storage units at Rocha's Littlerock, CA address to store refunded merchandise; Extensive financial transactions with co-conspirators; Communicated directly with ARG regarding specific refunds and methods via Telegram;
Kevin Ramses Rocha	ramsesmailbox@gmail.com ramsesexotics@gmail.com rzrramses@gmail.com kevinramsesrocha@gmail.com	Obtained numerous emails used for refunding; Received refunded merchandise at Littlerock, CA residence; Extensive financial transactions with co-conspirators;

Tyler Dewayne Rogers	rogers.tyler287@gmail.com 99tylerrogers@gmail.com 1999tylerrogers@gmail.com tylerrogerswmt@gmail.com	Placed refund orders on Telegram channels of ARG and others; Obtained numerous emails used for refunding; Resold refunded merchandise on various marketplaces (e.g. eBay, Mercari);
Jonah Maxwell Fesman	jonah@fesman.co fesmanking@gmail.com	Communicated directly with Team Artemis regarding refunds and methods; Placed refund orders on Telegram channel of Team Artemis; Obtained numerous emails used for refunding;
Cameron David Martin	master troll360@gmail.com notcameronmartin@gmail.com	Collaborated on “Artemis Dropshipping Log” associated with refunding; In an application to work for a different refunder, claimed to have done refunds and familiarity with refund methods; Received money from Wyatt Douglas Miller on multiple occasions;
Ilyess Hadri Talbi	dabagger614@gmail.com hoesisbad@gmail.com lewisnellie601@gmail.com brandojackson614@gmail.com	Collaborated on “Artemis Dropshipping Log” associated with refunding; Paypal account contained numerous high-dollar refunds; Transferred money to Antonio Munoz; Placed multiple orders with ARG; Requested numerous FTIDs from “FTID” sheets maintained by vaelxn and Gilbert Immanuel;
Juan Manuel Camacho-Zarate	camatrack@gmail.com jcpumas@gmail.com jcwack04@gmail.com jcwack03@gmail.com jcwack02@gmail.com jcwack097@gmail.com	Conducted refunds on behalf of DeathStroke
Steven Lin	stevenwlin11@gmail.com stevenwlin19@gmail.com wu1234lin@gmail.com	Conducted refunds on behalf of DeathStroke; Placed orders on DeathStroke Telegram channel;
Gilbert Immanuel	kusapolisi@gmail.com dragoncrusaderv@gmail.com jasonruslan2929@gmail.com cooperson10@gmail.com clarekusa78@gmail.com	Handled FTIDs for ARG co-conspirators; Placed refund orders on DeathStroke and ARG telegram channels;

28. ARG’s success with refund fraud resulted in partnerships with off-shoot groups, likely due to ARG's ability to gain instant refunds from certain retailers. One

such off-shoot group which worked in conjunction with ARG was known as “Deathstroke.” This group included several un-indicted co-conspirators.

29. In some instances, ARG would coordinate certain refunds with specific individuals. For instance, ARG assigned some orders from UK stores to be handled by a UK-based unindicted co-conspirator operating a sheet known as “DH Orders”.

30. These offshoot groups and individuals operated similar patterns of refund fraud using ARG’s methods, resources, and assistance, as well as its refund fraud model.

31. It was part of the Conspiracy that ARG caused to be transmitted by means of wire communications in interstate commerce writings, signs, signals, pictures, and sounds that crossed state and international lines, including, but not limited to, electronic communications between the CHS and VaelSupport, as set out more fully in paragraphs 11 through 15 of this Indictment. Additionally, all members of the ARG conspiracy utilized Telegram messaging and cloud-based forms to complete the refund fraud.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

[18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2)(A), and 28 U.S.C. § 2461]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(2)(A), and Title 28, United States Code, Section 2461.

Upon conviction of the offenses alleged in this Indictment, as a part of their sentences, the defendants, **WYATT DOUGLAS MILLER, KEVIN RAMSES ROCHA, TYLER DEWAYNE ROGERS, JONAH MAXWELL FESMAN, ANTONIO ERNESTO MUNOZ, JUAN MANUEL CAMACHO-ZARATE, CAMERON DAVID MARTIN, ILYESS HADRI TALBI, STEVEN LIN, and GILBERT IMMANUEL**, shall forfeit to the United States, any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law.

The property to be forfeited includes, but is not limited to:

MONEY JUDGMENT

A money judgment in an amount representing proceeds obtained by the defendants as a result of the offenses.

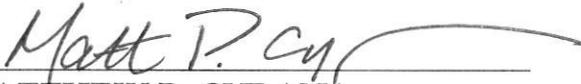
Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value

of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(2)(A), and Title 28, United States Code, Section 2461.

CLINTON J. JOHNSON
United States Attorney

A TRUE BILL


MATTHEW P. CYRAN
Assistant United States Attorney

s/ Grand Jury Foreperson
Grand Jury Foreperson