

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

GUYATREE SINGH,

Defendant.

SEALED INDICTMENT

23 Cr.

23 CRIM 393

COUNT ONE  
(Wire Fraud)

The Grand Jury charges:

Overview

1. From at least in or about April 2019 through at least in or about May 2023, GUYATREE SINGH, the defendant, engaged in a scheme to defraud at least approximately 120 Supplemental Nutrition Assistance Program (“SNAP”) recipients (the “Victims”) living in the Southern District of New York—a majority of whom appear to be elderly—of their SNAP benefits. In total, SINGH defrauded the Victims out of at least approximately \$49,754.52 in benefits.

The Supplemental Nutrition Assistance Program

2. SNAP provides low-income individuals with electronic benefits that can be used like cash to purchase food. People eligible for SNAP benefits are given an electronic benefit transfer (“EBT”) card, which looks like a debit card and gives a person access to his or her SNAP benefits—allowing the SNAP recipient to buy groceries and other items at participating stores. Each month, the EBT card is reloaded with additional funds. To use the EBT card, a SNAP recipient simply swipes the EBT card like he or she would a debit card, and then enters a personal identification number (“PIN”) into the card reader. Alternatively, if the SNAP recipient does not

have his or her physical EBT card available, the recipient can type in the account number listed on the EBT card into the card reader, followed by the PIN. If a recipient loses his or her account number, he or she can call New York City Human Resources Administration (“HRA”) to request it. And if a recipient wants to change his or her PIN, he or she can call HRA and change the PIN through an automated system, by providing his or her date of birth and social security number.

GUYATREE’s SNAP Fraud and Identity Theft Scheme

3. Beginning in at least in or about April 2019, GUYATREE SINGH, the defendant, called the Victims and pretended to be a New York State employee working for SNAP. SINGH asked the Victims for their personal identifying information, including their dates of birth and social security numbers. Unbeknownst to the Victims, SINGH then called HRA and used this information to reset the PINs for the Victims’ EBT cards. SINGH made these calls using her personal cellphone number, which ends in 7015.

4. Once the PINs were reset, in lieu of using the physical EBT card itself, GUYATREE SINGH, the defendant, used the PINs and EBT account numbers for the Victims to make purchases at grocery stores in Florida. On at least 15 occasions, SINGH, herself a SNAP recipient, depleted the balance on the Victim’s EBT card and then completed the purchase using her own EBT card.

5. Surveillance video from the grocery stores shows GUYATREE SINGH, the defendant, making the fraudulent purchases. The photograph below on the top left is from a grocery store in Florida, on or about March 20, 2023, at approximately 2:26pm, of SINGH leaving a pay terminal moments after having made a fraudulent purchase. The photograph below on the top right is from a grocery store in Florida, on or about March 26, 2023, at approximately 2:32pm, of SINGH leaving a pay terminal moments after having made a fraudulent purchase:



Statutory Allegations

6. From at least in or about April 2019 through at least in or about May 2023, in the Southern District of New York and elsewhere, GUYATREE SINGH, the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, SINGH engaged in a scheme to make false statements to approximately 120 SNAP recipients in order to fraudulently obtain their SNAP benefits through unauthorized use of the Victims' EBT account numbers, and made telephone calls from Florida to the Southern District of New York and elsewhere in furtherance of that scheme.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT TWO**  
**(Aggravated Identity Theft)**

The Grand Jury further charges:

7. From at least in or about April 2019 up to and including in or about May 2023, in the Southern District of New York and elsewhere, GUYATREE SINGH, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, SINGH used the names, dates of birth, and social security numbers of at least approximately 120 New York SNAP recipients during and in relation to the wire fraud violation charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

**FORFEITURE ALLEGATION**

8. As a result of committing the offense alleged in Count One of this Indictment, GUYATREE SINGH, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(e), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

9. If any of the above described forfeitable property, as a result of any act or omission 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 person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)



*Damian Williams*  
DAMIAN WILLIAMS  
United States Attorney