

Approved:



JUN XIANG / MATTHEW R. SHAHABIAN / JUSTIN HORTON  
Assistant United States Attorneys

Before:

THE HONORABLE ONA T. WANG  
United States Magistrate Judge  
Southern District of New York

# 23 MAG 1108

UNITED STATES OF AMERICA

v.

CHRISTOPHER PEEPLES,  
a/k/a "Jerry Chen,"  
a/k/a "Reginald Griffin,"  
a/k/a "Charles Richardson,"  
a/k/a "Robert Wolff,"  
KHALIL BEY-MUHAMMAD,  
GERALD LEE,  
a/k/a "Pimp,"  
MALCOLM REASONOVER,  
a/k/a "Uncle,"  
DEMETRIUS TORRY,  
a/k/a "Meechie,"  
GILBERT HUERTAS,  
a/k/a "Bully," and  
ANAYDA HUERTAS,

*Defendants*

**SEALED COMPLAINT**

Violations of 18 U.S.C. §§ 1343, 1344,  
1349, 1028A, 1029 and 2

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

DAVID SCHWARTZ, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service, and charges as follows:

**COUNT ONE**  
**(Conspiracy to Commit Wire and Bank Fraud)**

1. From at least in or about 2020 up to and including at least in or about 2022, in the Southern District of New York and elsewhere, CHRISTOPHER PEEPLES, a/k/a, "Jerry Chen," a/k/a "Reginald Griffin," a/k/a "Charles Richardson," a/k/a "Robert Wolff," KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a "Pimp," MALCOLM REASONOVER, a/k/a "Uncle," DEMETRIUS TORRY, a/k/a "Meechie," GILBERT HUERTAS, a/k/a "Bully," and ANAYDA HUERTAS, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit

wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a “Pimp,” MALCOLM REASONOVER, a/k/a “Uncle,” DEMETRIUS TORRY, a/k/a “Meechie,” GILBERT HUERTAS, a/k/a “Bully,” and ANAYDA HUERTAS, the defendants, and others known and unknown, 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, would and did transmit and cause 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, in violation of Title 18, United States Code, Section 1343.

3. It was further a part and an object of the conspiracy that CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a “Pimp,” MALCOLM REASONOVER, a/k/a “Uncle,” DEMETRIUS TORRY, a/k/a “Meechie,” GILBERT HUERTAS, a/k/a “Bully,” and ANAYDA HUERTAS, the defendants, and others known and unknown, knowingly would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

**COUNT TWO**  
**(Conspiracy to Commit Access Device Fraud)**

4. From at least in or about 2020 up to and including at least in or about 2022, in the Southern District of New York and elsewhere, CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a “Pimp,” MALCOLM REASONOVER, a/k/a “Uncle,” DEMETRIUS TORRY, a/k/a “Meechie,” GILBERT HUERTAS, a/k/a “Bully,” and ANAYDA HUERTAS, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit access device fraud, in violation of Title 18, United States Code, Section 1029(a)(2) and (a)(3).

5. It was a part and an object of the conspiracy that CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a “Pimp,” MALCOLM REASONOVER, a/k/a “Uncle,” DEMETRIUS TORRY, a/k/a “Meechie,” GILBERT HUERTAS, a/k/a “Bully,” and ANAYDA HUERTAS, the defendants, and others known and

unknown, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did traffic in and use one and more unauthorized access devices during a one-year period, and by such conduct did obtain one and more things of value aggregating \$1,000 and more during that period, in violation of Title 18, United States Code, Section 1029(a)(2).

6. It was further a part and an object of the conspiracy that CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a “Pimp,” MALCOLM REASONOVER, a/k/a “Uncle,” DEMETRIUS TORRY, a/k/a “Meechie,” GILBERT HUERTAS, a/k/a “Bully,” and ANAYDA HUERTAS, the defendants, and others known and unknown, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did possess fifteen and more devices which are unauthorized access devices, in violation of Title 18, United States Code, Section 1029(a)(3).

#### Overt Acts

7. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 10, 2020, a member of the conspiracy unlawfully accessed the online banking profile of a victim (“Victim-1”) who resides in Westchester County, New York and who maintained accounts at a commercial bank (“Bank-1”); created new accounts in Victim-1’s name at Bank-1; and transferred thousands of dollars from Victim-1’s existing Bank-1 accounts to the newly created accounts that was controlled by the member of the conspiracy.

b. On or about April 10, 2020, one or more members of the conspiracy entered Bank-1 branch locations in Arizona and made cash withdrawals from Victim-1’s existing bank accounts by filling out withdrawal slips bearing the account numbers for those accounts.

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

### **COUNT THREE** **(Aggravated Identity Theft – PEEPLES and LEE)**

8. In or about April 2020, in the Southern District of New York and elsewhere, CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” and GERALD LEE, the defendants, knowingly did transfer, possess, and use, 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, PEEPLES procured and provided to LEE a fraudulent driver’s license bearing the name and driver’s license number of Victim-1, who resides in Westchester County, New York, and LEE, and others, known and unknown, used the fraudulent driver’s license to unlawfully access Victim-1’s bank accounts, during and in relation to the wire and bank fraud

conspiracy charged in Count One and the access device fraud conspiracy charged in Count Two of this Complaint.

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

**COUNT FOUR**

**(Aggravated Identity Theft – PEEPLES, BEY-MUHAMMAD, and TORRY)**

9. In or about August 2020, in the Southern District of New York and elsewhere, CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” KHALIL BEY-MUHAMMAD, and DEMETRIUS TORRY, a/k/a “Meechie,” the defendants, knowingly did transfer, possess, and use, 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, PEEPLES procured and caused to be shipped to TORRY a fraudulent driver’s license bearing the name and driver’s license number of a victim (“Victim-5”) who resides in Orange County, New York, and BEY-MUHAMMAD, and others, known and unknown, used the fraudulent driver’s license to unlawfully access Victim-5’s bank accounts, during and in relation to the wire and bank fraud conspiracy charged in Count One and the access device fraud conspiracy charged in Count Two of this Complaint.

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

**COUNT FIVE**

**(Aggravated Identity Theft – PEEPLES and REASONOVER)**

10. In or about July 2020, in the Southern District of New York and elsewhere, CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” and MALCOLM REASONOVER, a/k/a “Uncle,” the defendants, knowingly did transfer, possess, and use, 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, PEEPLES procured and provided to REASONOVER a fraudulent driver’s license bearing the name and driver’s license number of a victim who resides in Florida (“Victim-9”), and REASONOVER, and others, known and unknown, used the fraudulent driver’s license to unlawfully access Victim-9’s bank accounts, during and in relation to the wire and bank fraud conspiracy charged in Count One and the access device fraud conspiracy charged in Count Two of this Complaint.

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

**COUNT SIX**

**(Aggravated Identity Theft – PEEPLES, GILBERT HUERTAS, and ANAYDA HUERTAS)**

11. In or about March 2021, in the Southern District of New York and elsewhere, CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a

“Charles Richardson,” a/k/a “Robert Wolff,” GILBERT HUERTAS, and ANAYDA HUERTAS, the defendants, knowingly did transfer, possess, and use, 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, GILBERT HUERTAS provided a photograph of ANAYDA HUERTAS to PEEPLES so that PEEPLES could furnish the photograph to a identity document forger to create a fraudulent driver’s license bearing the name and driver’s license number of a victim who resided in Texas (“Victim-14”), and ANAYDA HUERTAS, and others, known and unknown, used the fraudulent driver’s license to take over control of Victim-14’s cellphone, during and in relation to the wire and bank fraud conspiracy charged in Count One and the access device fraud conspiracy charged in Count Two of this Complaint.

**COUNT SEVEN**  
**(Aggravated Identity Theft – PEEPLES and ANAYDA HUERTAS)**

12. In or about March 2021, in the Southern District of New York and elsewhere, CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” and ANAYDA HUERTAS, the defendants, knowingly did transfer, possess, and use, 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, PEEPLES procured and provided to ANAYDA HUERTAS a fraudulent driver’s license bearing the name and driver’s license number of a victim who resides in Illinois (“Victim-10”), and ANAYDA HUERTAS, and others, known and unknown, used the fraudulent driver’s license to unlawfully access Victim-10’s bank accounts, during and in relation to the wire and bank fraud conspiracy charged in Count One and the access device fraud conspiracy charged in Count Two of this Complaint.

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

The bases for my knowledge and the foregoing charges are, in part, as follows:

13. I am a Postal Inspector with the United States Postal Inspection Service. I have been personally involved in the investigation of this matter. This affidavit is based upon my investigation, my conversations with law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

14. Since in or about 2020, law enforcement has been investigating a fraud crew (the “Crew”) led by CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” the defendant, and whose members also include KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a “Pimp,” MALCOLM

REASONOVER, a/k/a “Uncle,” DEMETRIUS TORRY, a/k/a “Meechie,” GILBERT HUERTAS, a/k/a “Bully,” and ANAYDA HUERTAS, the defendants.

15. The investigation has revealed that, since at least in or about 2020 and up to and including at least in or about 2022, the Crew has obtained stolen personally identifiable and financial information (the “Stolen Information”) belonging to numerous victims (the “Victims”) and used the Stolen Information to take over and withdraw money from the Victims’ bank accounts. In total, the Crew has stolen at least approximately \$1 million from bank accounts belonging to Victims, including Victims who reside in the Southern District of New York. The banks where the Victims’ accounts were maintained have reimbursed the Victims and borne the losses.

16. In the course of the investigation, I have participated in interviews of witnesses, including Victims and an individual who sold Stolen Information to the Crew and who is cooperating with law enforcement (“CW-1”),<sup>1</sup> and I have reviewed notes of interviews conducted by other law enforcement officers. I have also reviewed bank, travel, and other records, and reviewed the contents of two iCloud accounts belonging to PEEPLES (together, the “PEEPLES iClouds”), which were searched pursuant to a judicially authorized warrant.<sup>2</sup> Based on my review of the evidence described above, and my discussions with other law enforcement officers participating in this investigation, I have learned, among other things, the following regarding the methods of the Crew:

a. During the charged period, CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” the defendant, and/or KHALIL BEY-MUHAMMAD, the defendant, purchased or otherwise

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<sup>1</sup> CW-1 was previously convicted of offenses that included forgery, identity theft, possession of fraudulent documents, possession of stolen property, first-degree robbery, larceny, and vehicle-related crimes. CW-1 has pleaded guilty, pursuant to a cooperation agreement, to conspiracy to commit wire and bank fraud, conspiracy to commit access device fraud, wire fraud, aggravated identity theft, and passport fraud. CW-1 is assisting law enforcement under the terms of the cooperation agreement, in the hope of leniency at sentencing. Law enforcement deems the information provided by CW-1 in the course of this investigation to be credible and it has been corroborated, at least in part, by other witnesses, electronic evidence, bank records, and travel records.

<sup>2</sup> Based on my discussions with other law enforcement officers and my review of travel records, I have learned, among other things, the following regarding the PEEPLES iClouds (“iCloud-1” and “i-Cloud-2”): (a) iCloud-1’s username is the email address that was used by PEEPLES to book a flight for CW-1 to Chicago, Illinois, in or about July 2020, so that CW-1 could meet PEEPLES in person, (b) iCloud-2’s username is the email address that was used by PEEPLES to book a flight for CW-1 to Phoenix, Arizona, in or about July 2020, so CW-1 could join the Crew’s bank fraud activities, (c) iCloud-1’s username is “c.peeps12@gmail.com,” which is a shortened form of CHRISTOPHER PEEPLES’s name, and (d) iCloud-2’s username is the email address listed on account holder information for a bank account in the name of “Reginald Griffin,” which is one of PEEPLES’s known aliases.

obtained, through the Internet, personally identifiable and financial information belonging to Victims. Such information would generally include Victims' names, dates of birth, home addresses, Social Security Numbers, driver's license numbers, bank account information (sometimes including passwords), and phone numbers. PEEPLES purchased Stolen Information from, among others, CW-1.

b. Once PEEPLES and/or BEY-MUHAMMAD obtained Stolen Information for a Victim, they would provide that information to confederates responsible for forging identification documents (the "ID Forgers"). Using the Stolen Information, the ID Forgers would manufacture a counterfeit driver's license and sometimes a secondary form of false identification (each a "Fake ID") in the Victim's identity. If the Fake ID was a form of photo identification, it would bear the photograph of one of the Crew's members, typically GERALD LEE, a/k/a "Pimp," MALCOLM REASONOVER, a/k/a "Uncle," or ANAYDA HUERTAS, the defendants. Below are examples of photographs, saved on the PEEPLES iClouds, of Fake IDs in the identities of Victims and bearing the photographs<sup>3</sup> of LEE, REASONOVER, or ANAYDA HUERTAS:



c. In some cases, the Crew would take over the Victim's phone number through a "SIM swap" fraud—that is, by tricking the Victim's cellphone service

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<sup>3</sup> In the course of the investigation, I have received, from various state motor vehicle departments, official driver's license records for each defendant, and have reviewed those records. Based on that review, I recognize the faces of PEEPLES, BEY-MUHAMMAD, LEE, REASONOVER, GILBERT HUERTAS, and ANAYDA HUERTAS.

provider to switch service for the Victim's cellphone number to a SIM card<sup>4</sup> or cellphone controlled by the Crew. Members of the Crew would either impersonate the Victim and claim that the Victim's existing cellphone had been lost or would enlist the assistance of corrupt cellphone store employees who would agree to process the SIM swap in exchange for payment. The purpose of the SIM swap was to take over control of the Victim's cellphone number in order to gain access to the Victim's bank accounts—for example, to receive two-factor authentication or security text messages intended for the Victim.

d. In some cases, the Crew would use Stolen Information to log into Victims' online banking profiles, create new accounts in the Victim's name at the banks, and transfer funds from the Victim's existing accounts to the newly created accounts. The purpose of doing so was to divide the Victims' funds among as many bank accounts as possible, so the Victims' funds could be stolen through smaller withdrawals spread out among different bank accounts, which would be less likely to attract scrutiny from individual bank tellers processing single withdrawals in a single account.

e. Following the preparatory steps described above, the Crew would fly to a city to withdraw funds from Victims' accounts over a period of days. During these trips, a Crew member (the "Runner") would enter different bank locations impersonating the Victim. The Runner would bring Fake IDs in the Victim's identity (and bearing a photograph of the Runner). At the teller window, the Runner would request a withdrawal, typically for less than \$5,000 at a time to avoid triggering heightened bank scrutiny. In cases in which the Crew also obtained a "SIM-swapped" cellphone, that cellphone could also be used to intercept and impersonate the Victim in response to the bank's identification verification procedures. After a successful withdrawal, the Runner—and any Crew members participating in that trip—would drive to another bank branch location nearby to repeat the process until the Victim's bank accounts were substantially drained of funds. On a given trip, the Crew typically targeted multiple different Victims' accounts and typically stole tens of thousands of dollars, or more.

f. The Crew would use the proceeds from the trips to pay criminal confederates whose services they had employed, including the individuals from whom the Crew purchased the Stolen Information and the ID Forgers. For example, CW-1 has informed law enforcement, in substance and in part, that PEEPLES paid CW-1 for Stolen Information by sending cash in FedEx parcels to CW-1.

g. The Crew focused primarily on Victim accounts custodied at two major commercial banks ("Bank-1" and "Bank-2"), both of which are insured by the Federal Deposit Insurance Corporation ("FDIC").

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<sup>4</sup> Based on my training and experience, a subscriber identity module ("SIM") card is an electronic chip inside a cellphone that stores data necessary for that cellphone to make and receive calls from a particular phone number.



## Victim-1 and Victim-2

17. On or about October 7, 2022, a law enforcement officer interviewed a Victim who resides in Westchester County, New York (“Victim-1”). Based on my review of notes from that interview, I have learned that Victim-1 stated, in substance and in part, that: (a) in or about April 2020, Victim-1 learned from Bank-1 that tens of thousands of dollars were stolen from Victim-1’s accounts at Bank-1 through cash withdrawals from bank locations in Phoenix, Arizona, (b) at the time of the fraud, Victim-1 was home in New York, (c) Victim-1 noticed his phone behaving abnormally around the time that the fraudulent withdrawals occurred, and (d) Victim-1 did not open, or authorize anyone else to open, new accounts at Bank-1 in April 2020.

18. Based on my review of financial records of Victim-1’s accounts at Bank-1, I have learned, among other things, the following:

a. On or about April 10, 2020, new accounts in Victim-1’s name were opened at Bank-1 and thousands of dollars were transferred from Victim-1’s existing bank accounts to the newly opened accounts.

b. On or about April 10, 2020, multiple cash withdrawals—totaling approximately \$25,000—were made from the Victim-1 accounts (including the newly opened accounts) at various Bank-1 branch locations in Arizona. The person or persons who made the withdrawals forged Victim-1’s name on the withdrawal slips. Each individual withdrawal was for slightly less than \$5,000.

19. Based on my review of the contents of the PEEPLES iClouds, I know that the following were saved on the PEEPLES iClouds:

a. Photographs of Bank-1 receipts documenting the withdrawals of cash from the Victim-1 accounts on or about April 10, 2020.

b. And a photograph of a device logged into Victim-1’s online banking profile at Bank-1.

20. On or about October 12, 2022, a law enforcement officer interviewed a Victim who resides in Nassau County, New York (“Victim-2”). Based on my review of notes from that interview, I have learned that Victim-2 stated, in substance and in part, that: (a) in or about April 2020, Victim-2 learned from Bank-1 that approximately \$30,000 was stolen from Victim-2’s accounts at Bank-1, (b) at the time of the fraud, Victim-2 was driving cross-country, and (c) Victim-2 attempted to log into his online banking profile but the login credentials had been changed.

21. Based on my review of financial records of Victim-2’s accounts at Bank-1, I have learned, among other things, that on or about April 8, 2020, multiple cash withdrawals—totaling approximately \$30,000—were made from Victim-2’s accounts at various

Bank-1 branch locations in Arizona. Each individual withdrawal was for slightly less than \$5,000.

22. Based on my review of the contents of the PEEPLES iClouds, I know that the following were saved on the PEEPLES iClouds:

- a. Photographs of Bank-1 receipts documenting the withdrawals of cash from the Victim-2 accounts on or about April 8, 2020.
- b. A photograph of a device logged into Victim-2's online banking profile.
- c. And a photograph of a fraudulent driver's license with Victim-2's name, date of birth, and home address, but bearing the photograph of GERALD LEE, the defendant.

23. Based on my review of travel records, I have learned, among other things, that: (a) on or about April 5, 2020, CHRISTOPHER PEEPLES, a/k/a, "Jerry Chen," a/k/a "Reginald Griffin," a/k/a "Charles Richardson," a/k/a "Robert Wolff," KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a "Pimp," the defendants flew together from Chicago, Illinois to Phoenix, Arizona; (b) on or about April 10, 2020, BEY-MUHAMMAD rented a vehicle in Phoenix, Arizona; (c) on or about April 11, 2020, PEEPLES, BEY-MUHAMMAD, LEE, GILBERT HUERTAS, and ANAYDA HUERTAS, the defendants, flew together from Phoenix, Arizona to Chicago, Illinois.

#### Victim-3

24. On or about October 12, 2022, a law enforcement officer interviewed a Victim who resides in in Manhattan, New York ("Victim-3"). Based on my review of notes from that interview, I have learned that Victim-3 stated, in substance and in part, that: (a) in or about May 2020, Victim-3 learned from Bank-1 that approximately \$20,000 was stolen from Victim-3's accounts at Bank-1 through cash withdrawals of slightly less than \$5,000 each, (b) Victim-3 noticed his phone behaving abnormally around the time that the fraudulent withdrawals occurred, and (c) Victim-3 learned from Bank-1 that a new account at Bank-1 was opened in Victim-3's name around the time that the fraudulent withdrawals occurred.

25. Based on my review of the contents of the PEEPLES iClouds, I know that the following were saved on the PEEPLES iClouds:

- a. A photograph of a fraudulent driver's license with Victim-3's name, date of birth, and home address, but bearing the photograph of GERALD LEE, the defendant, and a credit card in Victim-3's name.
- b. A photograph of an electronic document showing Victim-3's name, home address, phone number, card number, PIN number, and Social Security number, among other information.

Victim-4

26. Based on my review of records of the financial accounts at Bank-1 of a Victim who lived in Chicago, Illinois (“Victim-4”), I have learned, among other things, the following:

- a. Victim-4 lived in Chicago, Illinois.
- b. On or about May 14, 2020, new accounts in Victim-4’s name were opened at Bank-1.
- c. On or about May 14, 2020, multiple cash withdrawals—totaling approximately \$25,000—were made from the Victim-4 accounts (including the newly opened accounts) at various Bank-1 branch locations in Arizona, including in Phoenix, Arizona. The person or persons who made the withdrawals forged Victim-4’s name on the withdrawal slips. Each individual withdrawal was for slightly less than \$5,000.

27. Based on my review of the contents of the PEEPLES iClouds, I know that the following were saved on the PEEPLES iClouds:

- a. A photograph of a Bank-1 receipt documenting the withdrawal of cash from one of Victim-4’s accounts on or about May 14, 2020.
- b. Photographs of a device logged into Victim-4’s online banking profile at Bank-1.
- c. Photographs of FedEx receipts for parcels mailed from Avondale, Arizona to an address in Brooklyn, New York.<sup>5</sup> As discussed above, CW-1 has informed law enforcement, in substance and in part, that CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” the defendant, sometimes paid for Stolen Information by sending FedEx parcels with cash to the sellers of Stolen Information.

28. Based on my review of travel records, I have learned, among other things, that: (a) on or about May 11, 2020, CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” and GERALD LEE, a/k/a “Pimp,” the defendants, flew together from Chicago, Illinois to Phoenix, Arizona; and (b) on or about May 11, 2020, GILBERT HUERTAS, the defendant, rented a vehicle in Phoenix, Arizona.

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<sup>5</sup> Based on my review of public domain sources, I have learned that Avondale is approximately 19 minutes away from Phoenix by car.

## Roles in the Crew

### *CHRISTOPHER PEEPLES*

29. Based on my interviews with CW-1, my review of the contents of the PEEPLES iClouds, and my review of law enforcement records, I have learned, among other things, that:

a. CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” the defendant, was the leader of the Crew and was responsible for, among other things, purchasing the Stolen Information, sending the Stolen Information to the ID Forgers, logging into the online banking profiles, booking and participating in trips to steal Victim funds, and otherwise directing the activities of other members of the Crew.

b. PEEPLES used the aliases “Jerry Chen,” “Reginald Griffin,” “Charles Richardson,” and “Robert Wolff” to operate the Crew and communicate with coconspirators. Based on my review of records maintained by the United States Postal Office, I have learned that PEEPLES received mail in the aliases of “Charles Richardson” and “Reginald Griffin” as recently as on or about December 19, 2022. Based on my review of electronic evidence in the investigation, I have learned that PEEPLES regularly used “Jerry Chen” as his alias in electronic communications with sellers of Stolen Information.

30. As discussed above, the PEEPLES iClouds contains numerous photographs of PEEPLES documenting the operation of the Crew, including, among other things, (a) photographs of Fake IDs bearing the Stolen Information of Victims, but photographs of Crew members, (b) photographs of an individual, believed to be PEEPLES,<sup>6</sup> holding withdrawal receipts documenting cash withdrawals from Victim accounts, (c) photographs of the online banking profiles of Victims, and (d) photographs of receipts showing that an individual, believed to be PEEPLES, had mailed specific FedEx parcels, which, as discussed, CW-1 described as the method that PEEPLES used to deliver cash to sellers of Stolen Information.

31. In addition to the above, the PEEPLES iClouds contains substantial other evidence of PEEPLES’s role in the Crew, including, for example:

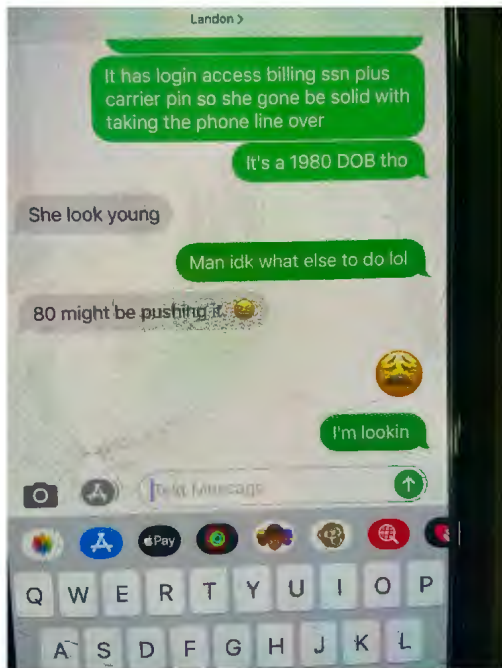
a. Numerous photographs of PEEPLES displaying large quantities of cash, such as the photographs below.

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<sup>6</sup> Based on my review of law enforcement records related to PEEPLES’s arrest in Iowa in or about 2009, I have learned that PEEPLES has a tattoo with the words “In Virum” on his wrist. That tattoo is visible in multiple photographs in the PEEPLES iClouds.



b. Photographs of PEEPLES's communications with coconspirators and sellers of Stolen Information regarding the operations of the Crew. For example, in the text messages below, PEEPLES communicated with a coconspirator ("CC-1") about recruiting a Runner who could impersonate a Victim with a birthdate in 1980 ("It's a 1980 DOB tho") and explained that the Crew already had access to Stolen Information for the Victim and a SIM-swapped phone ("It has login access billing ssn plus carrier pin so she gone be solid with taking the phone line over.").



c. Photographs of Fake IDs bearing the Stolen Information of Victims and PEEPLES's photograph, including the below fraudulent Arizona driver's license bearing PEEPLE's photograph but the name and personal identifying information of a Victim who resides in Avondale, Arizona.



*KHALIL BEY-MUHUMMAD*

32. Based on my interviews with CW-1, my review of the contents of the PEEPLES iClouds, and my review of law enforcement records, I have learned, among other things, that KHALIL BEY-MUHAMMAD, the defendant, was second-in-command of the Crew and was responsible for, among other things, purchasing the Stolen Information, participating in trips to steal Victim funds, and occasionally acting as a Runner. CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” the defendant, referred to BEY-MUHAMMAD as his brother.

33. Based on my review of the contents of the PEEPLES iClouds, I know that the following were saved on the PEEPLES iClouds:

a. A photograph of BEY-MUHAMMAD posing for a photograph to be used for the creation of Fake IDS, as well as a photograph of a Fake ID (bearing Stolen Information from a Victim) that was created as a result.



b. Photographs of the real driver's license of a Victim who resides in Middletown, New York (“Victim-5”) as well as a loan application in Victim-5's name and a sample of Victim-5's signature.

34. On or about February 8, 2023, I interviewed Victim-5. During that interview, Victim-5 stated, in substance and in part: (a) in or about August 2020, Victim-5 learned, from Bank-1, that a cash withdrawal of approximately \$5,000 was attempted from a branch location in Ohio, (b) Victim-5 did not make or authorize the attempted withdrawal, and



(c) at or around the time of the attempted withdrawal, Victim-5 had submitted loan applications in connection with his business.

35. Based on my review of law enforcement records, I have learned, among other things, the following:

a. On or about June 1, 2022, a man (“CC-2”) walked into a cellphone store in Michigan impersonating a Victim who resided in North Carolina (“Victim-6”) and requested that a new SIM card be added to Victim-6’s cellphone plan. The store employee called the police. When police officers arrived, they observed CC-2 entering a vehicle, which was occupied by two other men, later identified to be BEY-MUHAMMAD and DEMETRIUS TORRY, a/k/a “Meechie,” the defendant. Police officers stopped the vehicle and placed BEY-MUHAMMAD and CC-2 under arrest. Inside the vehicle, police officers found a fraudulent New York driver’s license bearing Victim-5’s Stolen Information and BEY-MUHAMMAD’s photograph, as well as additional Fake IDs bearing other Victims’ Stolen Information and CC-2’s photograph. As discussed above at paragraphs 33(b) and 34, Victim-5’s driver’s license and loan application were saved on the PEEPLES iClouds and in or about August 2020, an individual attempted to fraudulently withdraw approximately \$5,000 from Victim-5’s bank account at Bank-1.

b. On or about November 20, 2020, police officers conducted a traffic stop of BEY-MUHAMMAD in Chicago, Illinois. The officers observed a vehicle that BEY-MUHAMMAD was driving through a stop sign and double-park in the street. After the officers stopped the vehicle, they smelled the odor of marijuana emanating from inside the vehicle. The officers directed BEY-MUHAMMAD to exit the vehicle to search the vehicle for controlled substances. Inside the vehicle that BEY-MUHAMMAD was driving, the officers found numerous Fake IDs, including a fraudulent driver’s license and a fraudulent debit card in the name of a Victim who resides in North Carolina (“Victim-7”). On or about February 5, 2023, a law enforcement officer interviewed Victim-7. Based on my review of notes from that interview, I have learned that Victim-7 stated, in substance and in part, that: (a) in or about November 2020, Victim-7 learned from a major commercial bank that is FDIC-insured (“Bank-3”) that thousands of dollars were stolen from Victim-7’s accounts at Bank-3 through cash withdrawals from a branch location in Chicago and (b) according to a Bank-3 employee, the person who withdrew the funds presented a driver’s license in Victim-7’s name.

#### GERALD LEE

36. Based on my interviews with CW-1, my review of the contents of the PEEPLES iClouds, and my review of law enforcement records, I have learned, among other things, that GERALD LEE, a/k/a “Pimp,” the defendant, was a principal Runner for the Crew and regularly participated in trips to steal Victims’ funds. During those trips, LEE entered bank locations and impersonated Victims, in order to fraudulently withdraw money.

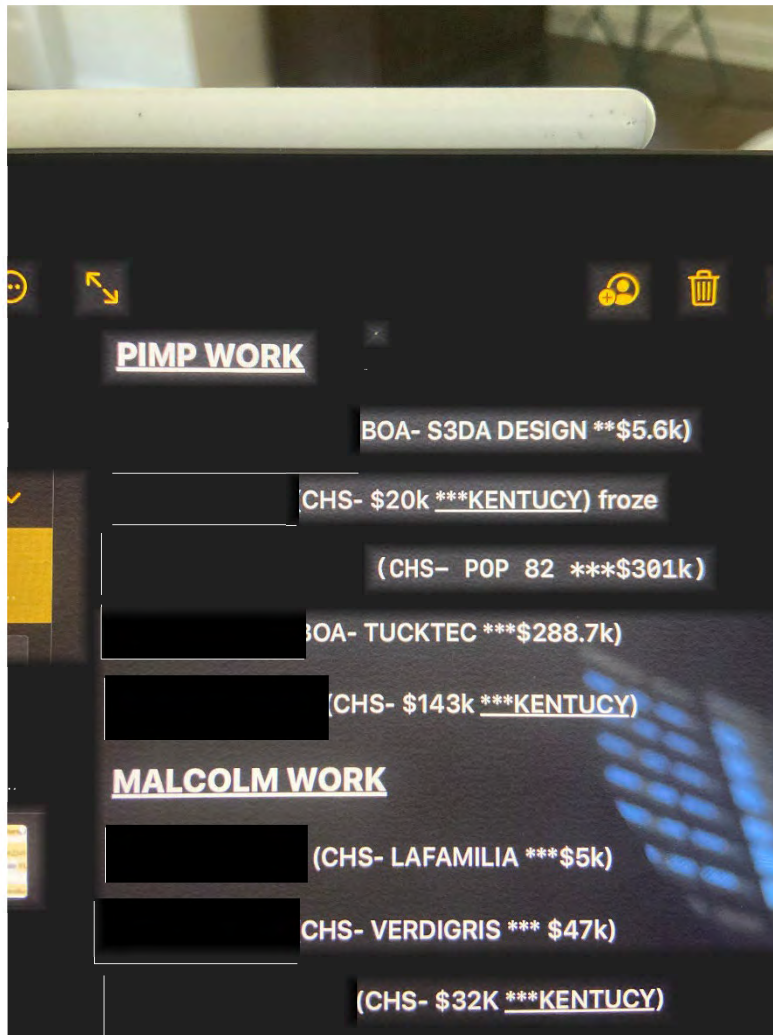
37. Based on my review of the contents of the PEEPLES iClouds, I know that the following were saved on the PEEPLES iClouds:



a. Photographs of Fake IDs bearing the Stolen Information of Victims and LEE's photograph, such as the photograph below.



b. A photograph, which appears below, of an electronic document with the headings "PIMP WORK" and "MALCOLM WORK," under which are listed the names of several Victims, the banks at which those Victims have funds, and the approximate amount of the balances in the Victims' bank accounts. Based on my involvement in this investigation, I believe that "PIMP WORK" refers to Victims whom LEE, a/k/a "Pimp," was responsible for impersonating, whereas "MALCOLM WORK" refers to Victims whom MALCOLM REASONOVER, a/k/a "Uncle," was responsible for impersonating.



c. As discussed above, at paragraphs 20 through 25, the Victims whom LEE impersonated included Victim-2, from whose accounts approximately \$30,000 was stolen, and Victim-3, from whose accounts approximately \$20,000 was stolen. Saved on the PEEPLES iClouds were photographs of Fake IDs in the identities of Victim-2 and Victim-3, which bore the Victims' names, home addresses, dates of birth, and driver's license numbers, but the photograph of LEE.

#### MALCOLM REASONOVER

38. Based on my interviews with CW-1, my review of the contents of the PEEPLES iClouds, and my review of law enforcement records, I have learned, among other things, that MALCOLM REASONOVER, a/k/a "Uncle," the defendant, was a principal Runner for the Crew and regularly participated in trips to steal Victims' funds. During those trips, REASONOVER entered bank locations and impersonated Victims, in order to fraudulently withdraw money.

39. Based on my review of the contents of the PEEPLES iClouds, I know that the following were saved on the PEEPLES iClouds:

a. Photographs of Fake IDs bearing the Stolen Information of Victims and REASONOVER's photograph, such as the photograph below. These Fake IDs include a fraudulent New Jersey driver's license bearing the Stolen Information of a Victim who resides in Basking Ridge, New Jersey ("Victim-8") and a fraudulent Florida Driver's license bearing the Stolen Information of a Victim who resides in Florida ("Victim-9").



b. As discussed above at paragraph 37(b), a photograph of an electronic document with the headings "PIMP WORK" and "MALCOLM WORK," under which are listed the names of several Victims, the banks at which those Victims have funds, and the approximate amount of the bank balances in the Victim accounts.

40. On or about February 3, 2023, I interviewed Victim-8, who resides in New Jersey and whose Stolen Information was used to create a fraudulent New Jersey driver's license bearing REASONOVER's photograph. During that interview, Victim-8 stated, in substance and in part: (a) approximately two years ago, Victim-8 learned that an unknown individual used a fraudulent debit card in Victim-8's name to make several thousand dollars of purchases at luxury stores, and (b) approximately five months ago, Victim learned, from Bank-1, that unknown individuals fraudulently withdrew approximately \$5,000 from Victim-8's account at a Bank-1 branch location in Ohio.

41. On or about February 6, 2023, I interviewed Victim-9, who resides in Florida, who resides in Florida and whose Stolen Information was used to create a fraudulent Florida driver's license bearing REASONOVER's photograph. During that interview, Victim-9 stated, in substance and in part: (a) in or about July 2020, Victim-9 received an alert from Bank-1 in regard to his accounts, (b) at around that time, Victim-9's cellphone stopped working and Victim-9 learned that service to his cellphone number had been switched to another SIM card, and (c) Victim-9 later learned, from Bank-1, that unknown individuals had opened multiple new accounts in Victim-9's name, transferred funds from Victim-9's existing accounts to the newly created accounts, and successfully withdrawn a portion of the transferred funds.

42. Based on my review of law enforcement records, I have learned, among other things, the following:

a. On or about July 20, 2019, police officers arrested MALCOM REASONOVER, the defendant, based on information provided by a banker at a Bank-1 branch in Chicago, Illinois, who identified REASONOVER as a person who presented the banker with a fraudulent California driver's license in the name of a Victim who resides in California ("Victim-12"), and attempted to withdraw \$4,950 from Victim-12's account.

b. When arrested, REASONOVER possessed, among other things, the fraudulent driver's license in Victim-12's name, as well as a fraudulent credit card in Victim-12's name.

#### DEMETRIUS TORRY

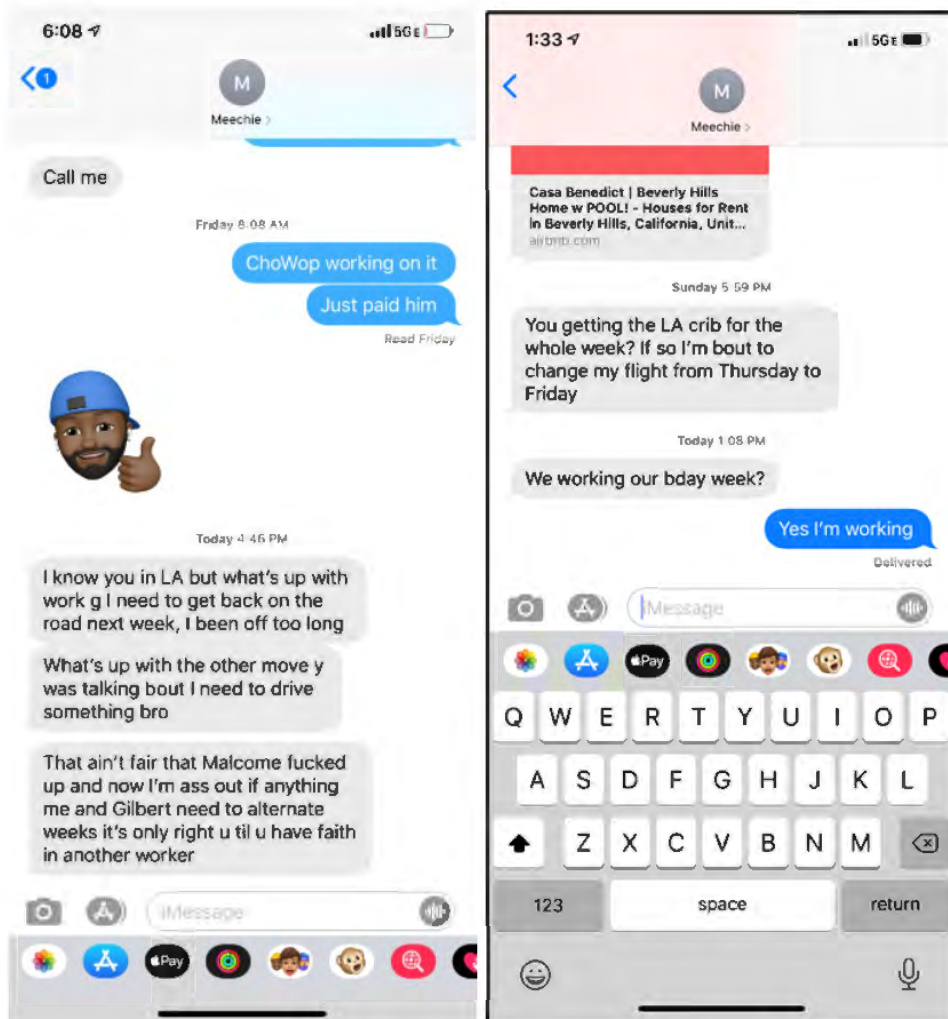
43. Based on my review of the contents of the PEEPLES iClouds, and my review of law enforcement records, I have learned, among other things, that DEMETRIUS TORRY, a/k/a "Meechie," the defendant, was a member of the Crew who participated in trips to steal Victims' funds and, among other things, received Fake IDs on behalf of the Crew and served as a driver for the Crew's jobs.

44. Based on my review of subscriber records for a CashApp account for the user "meechbilli," I know that the listed subscriber is TORRY. Based on my review of publicly available social media information for an Instagram account for the user "billionaire meech," including photographs posted to the account, which show TORRY, I believe that the user of that account is TORRY. Based on the foregoing, I believe that "Meechie" or "Meech" are aliases used by TORRY.

45. Based on my review of the contents of the PEEPLES iClouds, I know that the following were saved on the PEEPLES iClouds:

a. An insurance document, listing DEMETRIUS TORRY, the defendant, as the insured, saved in the PEEPLES iClouds as “SafeAutoInsurance (PG.2) MEECHIE-01.png.”

b. Text messages, such as those captured in the photographs below, between TORRY, who uses the alias “Meechie,” and CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” the defendant, discussing TORRY’s being a “worker,” along with “Malcolme” (MALCOLM REASONOVER) and “Gilbert” (GILBERT HUERTAS).



c. An electronic document with instructions to ship Fake IDs to TORRY, including Fake IDs for Victim-5, as shown below (with red redactions in original).





46. As discussed above at paragraph 35(a), on or about June 1, 2022, police officers found a fraudulent New York driver’s license bearing Victim-5’s Stolen Information and a photograph of KHALIL BEY-MUHAMMAD, the defendant, inside a vehicle with BEY-MUHAMMAD and TORRY.

### GILBERT HUERTAS

47. Based on my review of the contents of the PEEPLES iClouds, and my review of law enforcement records, I have learned, among other things, that GILBERT HUERTAS, a/k/a “Bully,” the defendant, was a member of the Crew who participated in trips to steal Victims’ funds and, among other things, served as a driver for the Crew as they traveled from bank branch to bank branch to fraudulently withdraw money.

48. Based on my review of travel records, I have learned, among other things, that GILBERT HUERTAS traveled with CHRISTOPHER PEEPLES, a/k/a, “Jerry Chen,” a/k/a “Reginald Griffin,” a/k/a “Charles Richardson,” a/k/a “Robert Wolff,” the defendant, during trips, including the April 2020 trip to Phoenix, Arizona to steal from Victim-1’s accounts and the May 2020 trip to Phoenix, Arizona to steal from Victim-4.

49. As discussed above, based on my review of the contents of the PEEPLES iClouds, I have learned, among other things, the following:

a. DEMETRIUS TORRY, a/k/a “Meechie,” texted with PEEPLES about, among other things, “me and Gilbert need to alternate weeks it’s only right u til u have faith in another worker.” Based on my involvement in the investigation, I believe that TORRY was telling PEEPLES that PEEPLES should alternate between using TORRY and GILBERT HUERTAS as the driver of the Crew.

b. PEEPLES texted an unknown individual that PEEPLES had recently “doubled what I pay Gil.” Based on the context of the conversation, and my involvement in the investigation, I believe that PEEPLES was telling the recipient of this text message that PEEPLES had recently increased the compensation paid to GILBERT HUERTAS.

c. PEEPLES provided the name, driver’s license, date of birth, and home address of a Victim who resided in Houston, Texas (“Victim-14”) to an individual that

CW-1 has identified to be an ID Forger. In the same message, PEEPLES provided a headshot photograph of ANAYDA HUERTAS, who is GILBERT HUERTAS's mother. The metadata on the headshot photograph shows that it was sent to PEEPLES by "Bully," which I know to be an alias for GILBERT HUERTAS because, among other things, GILBERT HUERTAS's name and home address are associated with the CashApp account "ghostxbully" and the user of the Instagram Account "millionairebully" posted numerous photographs of GILBERT HUERTAS. I have also reviewed a fraud complaint, filed by Victim-14 on or about July 22, 2020 with the Federal Bureau of Investigation Internet Complaint Center, in which Victim-14 stated, in substance and in part: "A scammer is using my phone number and I receive tons of phone call of random People if I have called them when I have." Based on the foregoing, I believe that GILBERT HUERTAS sent the headshot photograph of his mother, ANAYDA HUERTAS, to PEEPLES so PEEPLES could have a Fake ID made in Victim-14's name with ANAYDA HUERTAS's photograph and that, in fact, the Crew performed a "SIM swap" on Victim-14's cellphone.

50. Based on my review of law enforcement records, I have learned, among other things, the following:

a. On or about September 17, 2020, police officers responded to a Bank-1 branch location in Utah where GERALD LEE, the defendant, had attempted, unsuccessfully, to withdraw money from a Victim's account while impersonating the Victim ("Victim-13"). GILBERT HUERTAS and KHALIL BEY-MUHAMMAD, the defendant, were in a vehicle outside the bank branch where LEE had attempted to make the withdrawal. A police officer asked GILBERT HUERTAS about LEE, and GILBERT HUERTAS responded, in substance and in part, that LEE was a family friend whom GILBERT HUERTAS knew as "Pimp." HUERTAS also claimed that he and BEY-MUHAMMAD had rented an Airbnb in Utah in order to go hiking and that he did not know what was happening inside the bank.

b. The police officer interviewed LEE, who stated, in substance and in part, that BEY-MUHAMMAD and HUERTAS were not involved in the activities inside the bank. During this same interaction, LEE claimed to be "Barney," before ultimately admitting his real name.

51. Based on my interviews with CW-1, I have learned, among other things, that CW-1 knows GILBERT HUERTAS to be a driver and bodyguard for the Crew and that, among other things, GILBERT HUERTAS was the driver for a Crew trip to Utah, where other Crew members stole Victims' funds.

52. Based on my review of the contents of the PEEPLES iClouds, I know that saved on the PEEPLES iClouds were numerous photographs of brand-new Apple iPhones and other devices being purchased by the Crew, as well as photographs of new SIM cards. Based on my training and experience and my involvement in this investigation, I believe that the new cellphones were being purchased so that they could be used for "SIM swaps" and that the Crew continually purchased new cellphones for this purpose to evade detection by law enforcement. In one of the photographs, the name "Gilbert Huertas" is visible as the individual who picked up the new cellphone.

ANAYDA HUERTAS

53. Based on my interviews with CW-1, my review of the contents of the PEEPLES iClouds, and my review of law enforcement records, I have learned, among other things, that ANAYDA HUERTAS, the defendant, was a Runner for the Crew and participated in trips to steal Victims' funds. During those trips, ANAYDA HUERTAS entered bank locations and impersonated Victims, in order to withdraw money. ANAYDA HUERTAS is GILBERT HUERTAS's mother.

54. Based on my review of the contents of the PEEPLES iClouds, I know that saved on the PEEPLES iClouds were photographs of Fake IDs bearing the Stolen Information of Victims and ANAYDA HUERTAS's photograph, such as those below. These Fake IDs include a fraudulent Illinois driver's license bearing the Stolen Information of a Victim who resides in Springfield, Illinois ("Victim-10") and a fraudulent New York driver's license bearing the Stolen Information of a Victim who resides in Bellmore, New York ("Victim-11").



55. On or about February 2, 2023, another law enforcement officer interviewed Victim-10. Based on my review of the interview notes, I have learned that Victim-10 stated, in substance and in part, that, in or about March 2021, Victim-10 unexpectedly no longer received cellphone service on Victim-10's phone and learned, from Bank-1, that multiple unauthorized cash withdrawals had been made at Bank-1 branch locations from Victim-10's accounts, and that, in total, at least approximately \$50,000 was fraudulently withdrawn.



56. On or about February 2, 2023, another law enforcement officer interviewed Victim-11. Based on my review of the interview notes, I have learned that Victim-11 stated, in substance and in part, that in or about April 2021, Victim-11 learned, from Bank-1, that multiple unauthorized cash withdrawals had been made at Bank-1 branch locations from Victim-11's accounts, and that, in total, approximately \$20,000 to \$30,000 was fraudulently withdrawn.

WHEREFORE, I respectfully request that warrants be issued for the arrest of CHRISTOPHER PEEPLES, a/k/a, "Jerry Chen," a/k/a "Reginald Griffin," a/k/a "Charles Richardson," a/k/a "Robert Wolff," KHALIL BEY-MUHAMMAD, GERALD LEE, a/k/a "Pimp," MALCOLM REASONOVER, a/k/a "Uncle," DEMETRIUS TORRY, a/k/a "Meechie," GILBERT HUERTAS, a/k/a "Bully," and ANAYDA HUERTAS, the defendants and that they be arrested, and imprisoned or bailed, as the case may be.

S/ David Schwartz /otw

DAVID SCHWARTZ  
Postal Inspector  
United States Postal Inspection Service

Sworn to me through the transmission of this  
Complaint by reliable electronic means, pursuant to  
Federal Rules of Criminal Procedure 4.1 and 41(d)(3), this  
11<sup>th</sup> ~~10<sup>th</sup>~~ day of February, 2023

  
THE HONORABLE ONA T. WANG  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK