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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2024 Grand Jury

UNITED STATES OF AMERICA,

CR No. 2:24-CR-00756-MCS

Plaintiff,

I N D I C T M E N T

v.

GABRIEL HAY,  
aka "Mr. Handz,"  
aka "Diamondhandz,"  
aka "Centurion,"  
aka "Vaultkeeper," and  
GAVIN MAYO,  
aka "Gavinm,"

[18 U.S.C. § 1349: Conspiracy to  
Commit Wire Fraud; 18 U.S.C.  
§ 1343: Wire Fraud; 18 U.S.C.  
§ 2261A(2) (B): Stalking;  
18 U.S.C. § 982: Criminal  
Forfeiture]

Defendants.

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS AND DEFINITIONS

At all times relevant to this Indictment:

A. DEFENDANTS AND RELEVANT INDIVIDUALS

1. Defendant GABRIEL HAY ("HAY"), also known as ("aka") "Mr. Handz," aka "Diamondhandz," aka "Centurion," aka "Vaultkeeper," resided in Los Angeles County, California.

1           2. Defendant GAVIN MAYO ("MAYO"), aka "Gavinm," resided in  
2 Pennsylvania, Florida, and Los Angeles County, California.

3           3. Co-Conspirator 1 ("CC-1") resided in Virginia and Los  
4 Angeles County, California.

5           4. Project Manager 1 resided in Orange County, California.

6           B. DEFINITIONS

7           5. Cryptocurrency, a type of virtual currency, is a  
8 decentralized, peer-to-peer, network-based medium of value or  
9 exchange that may be used as a substitute for fiat currency to buy  
10 goods or services or exchanged for fiat currency or other  
11 cryptocurrencies. Examples of cryptocurrency are Bitcoin, Ether,  
12 Solana, Tether ("USDT"), Chainlink ("LINK"), and Litecoin.

13 Cryptocurrency can exist digitally on the Internet, in an electronic  
14 storage device, or in cloud-based servers.

15           6. Cryptocurrencies operate on a "blockchain," which is a  
16 distributed public ledger, run by the decentralized network, containing  
17 an immutable and historical record of every transaction. Examples of  
18 blockchains are the Bitcoin blockchain, Ethereum blockchain, and Solana  
19 blockchain.

20           7. Cryptocurrency is stored in a virtual account called a  
21 wallet. Wallets are software programs that interface with  
22 blockchains and generate and/or store public and private keys used to  
23 send and receive cryptocurrency. A public key or address is akin to  
24 a bank account number, and a private key is akin to a PIN number or  
25 password that allows a user the ability to access and transfer value  
26 associated with the public address or key. To conduct transactions  
27 on a blockchain, an individual must use the public address (or  
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1 "public key") and the private address (or "private key").

2 8. A non-fungible token ("NFT") is a cryptographic token that  
3 exists on a blockchain and represents ownership of a specific item or  
4 asset. Similar to a digital certificate of authenticity, NFTs are  
5 used to verify the ownership or history of a specific item or asset.  
6 NFTs are secured by the blockchain, which allows for transfer of  
7 ownership and can be used to verify the provenance of an NFT. NFTs  
8 can be created for a variety of assets, including art, collectibles,  
9 and even real estate. NFTs are created through a process called  
10 minting, which is commonly done by the artists, creator, or license-  
11 holder, and involves publishing an NFT on a blockchain so that it can  
12 be bought, sold, and traded.

13 9. A rug pull is a type of fraud scheme in which the creator  
14 of an NFT or digital asset project fraudulently solicits funds from  
15 purchasers in connection with the project and then abruptly abandons  
16 the project and retains the funds.

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COUNT ONE

[18 U.S.C. § 1349]

[ALL DEFENDANTS]

The Grand Jury hereby realleges and incorporates by reference paragraphs 1 through 9 of the Introductory Allegations and Definitions of this Indictment as though fully set forth herein.

A. OBJECT OF THE CONSPIRACY

10. Beginning on a date unknown to the Grand Jury, but no later than in or around May 2021, and continuing through at least in or around May 2024, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAY and MAYO, CC-1, and others known and unknown to the Grand Jury knowingly conspired and agreed with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

B. MANNER AND MEANS OF THE CONSPIRACY

11. The object of the conspiracy was to be carried out, and was carried out, in substance, as follows:

a. Defendants HAY and MAYO, CC-1, and others would sponsor a number of NFT and other digital asset projects and undertake promotional activities in support of those projects.

b. During the launch and promotion of these projects, defendants HAY and MAYO, and CC-1, would make materially false and misleading statements, or cause others to make materially false and misleading statements, to potential purchasers concerning the NFTs or other digital assets being launched and the projects' potential to create value for purchasers of those assets.

1 c. Defendants HAY and MAYO, and CC-1, would publicize to  
2 potential purchasers false and misleading project "roadmaps"  
3 detailing plans for the NFTs and other digital asset projects after  
4 their launch.

5 d. Defendants HAY and MAYO, and CC-1, would hire other  
6 individuals to do a variety of tasks for the projects, including the  
7 creation of digital assets to sell to victims, the registration of  
8 email domains and social media accounts, and the moderation of chat  
9 groups affiliated with the projects to prevent the dissemination of  
10 information exposing the projects as rug pulls and the identity of  
11 the defendants.

12 e. Once purchasers paid for the NFTs and other digital  
13 assets, defendants HAY and MAYO, and CC-1, would abandon the projects  
14 and split the funds raised between themselves and other co-  
15 conspirators.

16 f. Defendants HAY and MAYO, and CC-1, would use a variety  
17 of means to conceal their involvement in the fraudulent NFTs and  
18 other digital asset projects including inventing aliases, falsely  
19 identifying other individuals or causing other individuals to be  
20 falsely identified as owners of the projects, falsely denying their  
21 involvement or causing others to deny their involvement to potential  
22 purchasers in chat groups associated with the projects, and harassing  
23 individuals who publicly identified them as being involved in the  
24 projects.

25 g. Combinations of defendants HAY and MAYO, and CC-1,  
26 would use the above-described tactics for several NFTs and other  
27 digital assets, including projects known as Vault of Gems, Faceless,  
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1 Sinful Souls, Clout Coin, Dirty Dogs, Uncovered, MoonPortal,  
2 Squiggles, and Roost Coin.

3 h. As a result, combinations of defendants HAY and MAYO,  
4 and CC-1, raised over \$22.4 million from purchasers.

5 i. Defendants HAY and MAYO, and CC-1, would use  
6 interstate and foreign wire communications in furtherance of the  
7 above-described scheme.

8 C. OVERT ACTS

9 12. On or about the following dates, in furtherance of the  
10 conspiracy and to accomplish its object, defendants HAY and MAYO, CC-  
11 1, and co-conspirators known and unknown, committed and knowingly  
12 caused others to commit various overt acts, within the Central  
13 District of California and elsewhere, including, but not limited to,  
14 the following:

15 **Vault of Gems NFT Rug Pull**

16 Overt Act No. 1: On August 31, 2021, defendant HAY registered  
17 the Vault of Gems Twitter account.

18 Overt Act No. 2: On September 4, 2021, defendant HAY  
19 registered the Vault of Gems website. The website falsely claimed  
20 that Vault of Gems was to be the "first NFT project to be pegged to a  
21 hard asset." The website further falsely claimed that the project's  
22 "goal is to deploy a private Vault of Gems marketplace where VOG  
23 virtual assets can be exchanged in real time for hard assets. This  
24 will be achieved by working firsthand in partnerships with jewelers  
25 around the globe."

1 Overt Act No. 3: In and around August and September 2021,  
2 defendant HAY promoted the Vault of Gems NFTs by creating, or causing  
3 the creation of, Vault of Gems NFTs resembling the images below:



11 Overt Act No. 4: On September 17, 2021, defendant MAYO posted  
12 a video on TikTok falsely claiming that Vault of Gems NFTs were the  
13 "first NFT[s] pegged to a hard asset, like jewelry" and that the  
14 project had "already started making [its] own exchange" for jewelers  
15 to use.

16 Overt Act No. 5: On September 20, 2021, defendant MAYO used  
17 his cryptocurrency account to supply the initial funds to the Vault  
18 of Gems contract creator address.

19 Overt Act No. 6: On September 21, 2021, defendant HAY made  
20 the Vault of Gems NFTs available for minting on the Ethereum  
21 blockchain, thereafter raising more than \$1,080,000 worth of Ether  
22 from purchasers who sent funds to the Vault of Gems mint address.

23 Overt Act No. 7: On an unknown date no later than September  
24 22, 2021, defendant HAY caused the Vault of Gems smart contract to  
25 distribute funds from the mint address to defendant HAY and others.

26 Overt Act No. 8: On September 22, 2021, and continuing until  
27 October 26, 2021, defendant HAY received approximately 269 Ether to  
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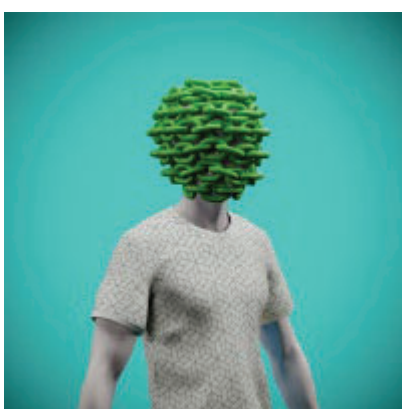
1 his cryptocurrency wallet from the Vault of Gems mint address.

2 Overt Act No. 9: On October 1, 2021, defendant HAY directed  
3 the registration of the Vault of Gems TikTok account.

4 Overt Act No. 10: On an unknown date no later than November  
5 20, 2021, defendants HAY and MAYO abandoned the Vault of Gems  
6 project.

7 **Faceless NFT Rug Pull**

8 Overt Act No. 11: On an unknown date no later than October 20,  
9 2021, defendant MAYO hired an artist to generate artwork for the  
10 Faceless NFT project resembling the images below:



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19 Overt Act No. 12: On an unknown date no later than October 19,  
20 2021, defendant MAYO hired Project Manager 1 to assist with the  
21 Faceless project.

22 Overt Act No. 13: On October 20, 2021, Project Manager 1 asked  
23 defendant MAYO about biographies of Faceless project team members to  
24 feature on the project's Discord, to which defendant MAYO responded,  
25 "[m]ake em up" and then supplied Project Manager 1 with an example of  
26 a made-up biography of an artist working on the project.

27 Overt Act No. 14: On October 22, 2021, defendant HAY  
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1 registered the Faceless website. The Faceless website included a  
2 project "roadmap" advertising the steps the project would take to  
3 achieve value for NFT purchasers. The website falsely claimed that:  
4 phase one of the Faceless NFT project was to include the release of  
5 the first edition of a "Faceless Chronicles" comic book; and phase  
6 two was to include: (1) the release of the second edition of the  
7 comic book, (2) the release of a Faceless movie, (3) the launch of a  
8 Faceless clothing company, and (4) "33% of secondary revenue [going]  
9 to [a] charity of [the] community's choice."

10 Overt Act No. 15: On November 19, 2021, defendants HAY and  
11 MAYO made the Faceless NFTs available for minting on the Solana  
12 blockchain, raising more than \$420,000 worth of Solana from  
13 purchasers who sent funds to the Faceless mint address.

14 Overt Act No. 16: On November 27, 2021, defendant MAYO  
15 received approximately 773 Solana (approximately \$153,000) from the  
16 Faceless mint address to an account set up for defendant MAYO's use.

17 Overt Act No. 17: On November 29, 2021, defendant HAY received  
18 approximately 1,006 Solana (approximately \$203,000) from the Faceless  
19 mint address to an account at a virtual currency exchange.

20 Overt Act No. 18: On November 29, 2021, defendant HAY  
21 converted the approximately 1,006 Solana into approximately 201,222  
22 USDT and then converted the USDT to approximately 8,028 LINK  
23 (approximately \$200,860).

24 Overt Act No. 19: In November 2021, when individuals  
25 participating in a public Discord chat group began to speculate as to  
26 the owners of the Faceless NFT project, defendants MAYO and HAY  
27 arranged for another individual to be identified as the owner to the  
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1 chat group.

2 Overt Act No. 20: On an unknown date no later than November  
3 20, 2021, defendants HAY and MAYO abandoned the Faceless project.

4 **Additional Digital Assets**

5 Overt Act No. 21: On May 21, 2021, defendant HAY drafted the  
6 following promotional language for the MoonPortal project: "Welcome  
7 to MoonPortal! 'Why fly to the moon, when you can teleport?' We are  
8 the most rapidly growing 'Moon Coin' on the market . . . ."

9 Overt Act No. 22: On June 24, 2021, defendant HAY drafted the  
10 following promotional language for the Clout Coin project: "From the  
11 people who did \$YUMMY, \$ELON, and \$MILF... The next \$100M Mcap gem  
12 hasn't even launched yet[.] The next big coin is launching TOMORROW  
13 and is doing a public presale so everyone can eat. It is called  
14 Clout Coin! \$CLOUT is creating the most user friendly NFT market  
15 place which aims to bridge the gap between your favorite influencers  
16 and the average joe."

17 Overt Act No. 23: In September and October 2021, defendant HAY  
18 hired an artist to create artwork for the Uncovered NFT project.

19 Overt Act No. 24: In October 2021, defendant MAYO hired  
20 Project Manager 1 to help set up the Discord server for the Sinful  
21 Souls project.

22 Overt Act No. 25: On October 12, 2021, defendant HAY wrote to  
23 CC-1 stating, "[l]et's start on dirty dogs asap," referring to the  
24 Dirty Dogs NFT project.

25 Overt Act No. 26: On February 10, 2022, a virtual currency  
26 exchange account controlled by defendant HAY funded the first  
27 transaction of the Squiggles contract creator address.

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1           Overt Act No. 27: In March 2024, defendant HAY recruited a team  
2 of people including CC-1 to assist in the launch of ROOST coin.

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COUNTS TWO THROUGH FIVE

[18 U.S.C. §§ 1343, 2(a)]

[ALL DEFENDANTS]

The Grand Jury hereby realleges and incorporates by reference paragraphs 1 through 9 of the Introductory Allegations and Definitions of this Indictment as though fully set forth herein.

A. SCHEME TO DEFRAUD

13. Beginning on a date unknown to the Grand Jury, but no later than in or around May 2021, and continuing through at least in or around May 2024, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAY and MAYO, CC-1, and others known and unknown to the Grand Jury knowingly and with the intent to defraud, devised, intended to devise, participated in, and executed a scheme to defraud victim-purchasers as to material matters, and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

14. The scheme operated, in substance, as set forth in paragraphs 11 and 12 of Count One of this Indictment, which is realleged and incorporated herein by reference as if set forth in full.

B. USE OF THE WIRES

15. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, for the purpose of executing the above-described scheme to defraud, defendants HAY and MAYO, each aiding and abetting each other, knowingly transmitted and caused the transmission of, the following

1 items by means of wire and radio communication, writings, signals,  
 2 pictures, and sounds in interstate and foreign commerce:

COUNT	DATE	INTERSTATE AND FOREIGN WIRE TRANSMISSION	DEFENDANT CHARGED
TWO	09/22/2021	Electronic transfer caused by defendant HAY (in California) of approximately 5.08 Ether from the Vault of Gems mint address to wallet address 0xede0...9eca at a virtual currency exchange (outside of California) through an intermediary address.	HAY
THREE	10/31/2021	Electronic communication from defendant MAYO (in California) to Project Manager 1 (in California) using Discord servers (outside of California) telling Project Manager 1 to "just make shit up" in connection with the Faceless project.	MAYO
FOUR	11/10/2021	Electronic communication from defendant MAYO (in California) to a family member (in Pennsylvania) telling the family member, "I need an untraced phone to put crypto on."	MAYO
FIVE	11/29/2021	Electronic transfer caused by defendant HAY (in California) of approximately 1,005 Solana from the Faceless project mint address to wallet address 0x4636...8b04 controlled by defendant HAY at a virtual currency exchange (outside of California).	HAY

COUNT SIX

[18 U.S.C. §§ 2261A(2)(B), 2(a)]

[ALL DEFENDANTS]

The Grand Jury hereby realleges and incorporates by reference paragraphs 1 through 9 of the Introductory Allegations and Definitions of this Indictment as though fully set forth herein.

16. Beginning on or about November 22, 2021, and continuing to at least on or about September 10, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants HAY and MAYO, with the intent to harass and intimidate Project Manager 1, aiding and abetting each other, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely cellular telephone networks, email, interstate wires, and the Internet, to engage in a course of conduct, including conduct described in Paragraph 17 below, that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Project Manager 1 and his parents.

17. Defendants HAY and MAYO's course of conduct included, among other things, the following:

a. On November 22, 2021, after Project Manager 1 revealed defendants HAY and MAYO as the owners of the Faceless NFT project, defendant HAY, with the assistance of defendant MAYO, sent, or caused the sending of, an email to Project Manager 1's parents falsely purporting to be from a law firm and threatening legal action. The message said in part, "[Project Manager 1] made some poor choices involving leaking sensitive information online" and included the home

1 address and ages of Project Manager 1's parents.

2 b. On November 22, 2021, defendants HAY and MAYO sent, or  
3 caused the sending of, a threatening text message to Project  
4 Manager 1 falsely purporting to be from an investor in the Faceless  
5 NFT Project. The message said, in part, that Project Manager 1 had  
6 "cause[d] serious damage to [himself] and [his] future" and  
7 instructed that he "message [the number] back when [he had] deleted  
8 and cleared the name of ALL those involved." The message said that  
9 Project Manager 1 had "1 hour" to remove the information. The  
10 message included the names and contact information for Project  
11 Manager 1's parents.

12 c. On November 28, 2021, defendants HAY and MAYO sent, or  
13 caused the sending of, an email purporting to be from a law firm to  
14 Project Manager 1's parents stating, in part: "[Project Manager 1]  
15 has tried multiple times to leak the personal information of a few  
16 individuals that are now going to make [his] family suffer unless he  
17 and his friend . . . stop their shenanigans in the next hour.  
18 Otherwise, strap in it's going to get real hectic." The email  
19 proceeded to make a number of threats including threats to falsely  
20 accuse Project Manager 1's parents of lewd sexual behavior. The  
21 email ended with the following message: "This is only the beginning  
22 if he doesn't [stop]."

23 d. On September 10, 2023, defendant MAYO sent, or caused  
24 the sending of, a direct message on Instagram to Project Manager 1  
25 stating, in part: "Don't think we forgot about you . . . Get ready to  
26 get destroyed . . . This account will be gone. Next is TikTok. Next  
27 is discord. After that you'll see what else."

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1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 982]

3 18. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 982(a)(2), in the event of any  
7 defendant's conviction of the offenses set forth in any of Counts One  
8 through Five of this Indictment.

9 19. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 (a) All right, title and interest in any and all property,  
12 real or personal, constituting, or derived from, any proceeds  
13 obtained, directly or indirectly, as a result of the offense; and

14 (b) To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph (a).

17 20. Pursuant to Title 21, United States Code, Section 853(p), as  
18 incorporated by Title 18, United States Code, Section 982(b), any  
19 defendant so convicted shall forfeit substitute property, up to the  
20 total value of the property described in the preceding paragraph if,  
21 as the result of any act or omission of said defendant, the property  
22 described in the preceding paragraph, or any portion thereof: (a)  
23 cannot be located upon the exercise of due diligence; (b) has been  
24 transferred, sold to or deposited with a third party; (c) has been  
25 placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

3 A TRUE BILL

4 /S/

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Foreperson

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7 E. MARTIN ESTRADA  
United States Attorney

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9  
10 DAVID T. RYAN  
Assistant United States Attorney  
11 Chief, National Security Division

12 KHALDOUN SHOBAKI  
Assistant United States Attorney  
13 Chief, Cyber & Intellectual Property Crimes Section

14 MAXWELL COLL  
Assistant United States Attorney  
15 Cyber & Intellectual Property Crimes Section

16 GLENN S. LEON  
Chief, Fraud Section  
17 U.S. Department of Justice

18 JOHN LYNCH  
Chief, Computer Crime & Intellectual Property Section  
19 U.S. Department of Justice

20 TIAN HUANG  
Trial Attorney, Fraud Section, Market Integrity & Major Frauds  
21 National Cryptocurrency Enforcement Team

22 TAMARA LIVSHIZ  
Trial Attorney, Fraud Section, Market Integrity & Major Frauds Unit  
23 National Cryptocurrency Enforcement Team

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