

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 26-
v.	:	DATE FILED:
IBRAHIM TOUGOUMA	:	VIOLATIONS:
TYLER GLENN-HAYWARD	:	18 U.S.C. § 371 (conspiracy to steal
	:	government funds – 1 count)
	:	18 U.S.C. § 1344 (bank fraud – 2 counts)
	:	18 U.S.C. § 1708 (possession of stolen mail
	:	– 2 counts)
	:	18 U.S.C. § 641 (theft of government
	:	funds – 4 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notices of forfeiture

INDICTMENT

COUNT ONE
(Conspiracy)

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant IBRAHIM TOUGOUMA and defendant TYLER GLENN-HAYWARD were residents of the Eastern District of Pennsylvania.
2. The United States Department of the Treasury, Bureau of the Fiscal Service (“BFS”), was responsible for printing and mailing United States Treasury checks to individuals and businesses throughout the United States. These Treasury checks represented payments from a large number of federal agencies and included, among many other payments, income tax refunds from the Internal Revenue Service (“IRS”), social security benefit payments from the Social Security Administration (“SSA”), and veterans benefit payments from the Department of Veterans Affairs.

3. Treasury checks, each with a unique treasury check number, were issued on behalf of federal agencies, such as the IRS and SSA, to a specific named payee, in a specific amount. These Treasury checks represented the payment of government funds to the individual named as the payee on the Treasury check in the amount listed on the Treasury check.

4. BFS operated two separate facilities, one of which was located in Philadelphia, Pennsylvania from which Treasury checks were mailed via United States Postal Service on a daily basis to individuals and businesses around the United States.

5. From in or about May 2024 to on or about August 14, 2024, in the Eastern District of Pennsylvania, and elsewhere, defendants

**IBRAHIM TOUGOUAMA and
TYLER GLENN-HAYWARD**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to steal and knowingly convert to their own use a thing of value of the United States in an amount over \$1,000, to which the defendants knew they were not entitled, in violation of Title 18, United States Code, Section 641.

MANNER AND MEANS

It was part of the conspiracy that:

6. Defendant IBRAHIM TOUGOUAMA and defendant TYLER GLENN-HAYWARD came into possession of stolen Treasury checks.

7. Defendant TYLER GLENN-HAYWARD altered and counterfeited the stolen Treasury checks, including at the direction of defendant IBRAHIM TOUGOUAMA.

8. Defendant IBRAHIM TOUGOUAMA paid defendant TYLER GLENN-HAYWARD for altering and counterfeiting the stolen Treasury checks through peer-to-peer mobile payment systems such as CashApp.

9. Defendant IBRAHIM TOUGOUMA and defendant TYLER GLENN-HAYWARD communicated on Telegram regarding their scheme to alter stolen Treasury checks. On Telegram, defendant TOUGOUMA utilized the name “Unlike Tim,” and defendant GLENN-HAYWARD utilized the name “OSAMABINSWIPINN” for the purpose of communicating about counterfeiting Treasury checks, reselling the Treasury checks they obtained, and aiding and abetting the deposit of stolen Treasury checks and altered Treasury checks into financial institutions.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants IBRAHIM TOUGOUMA and TYLER GLENN-HAYWARD, together and with others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about May 24, 2024:

1. Defendant IBRAHIM TOUGOUMA, utilizing Telegram, sent a photograph of a stolen Treasury check to defendant TYLER GLENN-HAYWARD. The stolen Treasury check in the photograph was issued by the SSA for victim M.O. in the amount of \$15,926.25 (“Check #1”).

2. Defendant IBRAHIM TOUGOUMA, utilizing Telegram, asked defendant TYLER GLENN-HAYWARD if defendant GLENN-HAYWARD could alter the payee information and provide a counterfeit of the valid Treasury check with the altered payee information for Check #1.

3. Defendant TYLER GLENN-HAYWARD, utilizing Telegram, confirmed he could alter and produce a counterfeit of Check #1. In response, defendant IBRAHIM

TOUGOUAMA inquired how much this would cost, to which defendant GLENN-HAYWARD responded, a “bean,” which the defendants understood to mean \$100.

4. Defendant IBRAHIM TOUGOUAMA, utilizing Telegram, sent the altered payee information that he wanted used for Check #1 to defendant TYLER GLENN-HAYWARD.

5. Defendant TYLER GLENN-HAYWARD sent defendant IBRAHIM TOUGOUAMA his CashApp address, and defendant TOUGOUAMA sent a snapshot of a \$100 peer-to-peer payment confirmation to the CashApp address provided by defendant GLENN-HAYWARD as compensation for the alteration of Check #1.

6. Defendant TYLER GLENN-HAYWARD altered the payee information on Check #1 as instructed by defendant IBRAHIM TOUGOUAMA, without the authority or permission of victim M.O. Defendant GLENN-HAYWARD reproduced the rest of the information on Check #1, such as the issue date, agency code, check serial number, Treasury routing number, and the proper payment amount of \$15,926.25.

7. After receiving proof of the payment, defendant TYLER GLENN-HAYWARD, utilizing Telegram, sent defendant IBRAHIM TOUGOUAMA two .pdf files of the counterfeit Treasury check for Check #1, with the payee information altered as directed by defendant TOUGOUAMA.

8. On or about May 29, 2024, defendant IBRAHIM TOUGOUAMA caused the counterfeit Treasury check for Check #1 to be deposited at Wells Fargo, a financial institution, via an ATM located in Wilmington, Delaware.

On or about July 11, 2024:

9. Defendant IRBAHIM TOUGOUAMA and defendant TYLER GLENN-HAYWARD exchanged messages via Telegram containing photographs of Treasury checks. In these Telegram messages, defendants TOUGOUAMA and GLENN-HAYWARD discussed the resale of these checks and how to deposit the checks themselves at either a check casher or a financial institution.

10. In the Telegram exchange, defendant TYLER GLENN-HAYWARD directed defendant IBRAHIM TOUGOUAMA to send him an image of a stolen Treasury check.

11. Defendant IBRAHIM TOUGOUAMA, utilizing Telegram, sent defendant TYLER GLENN-HAYWARD an image of a stolen Treasury check issued by the IRS for victim G.M., in the amount of \$173,194 ("Check #2").

12. Defendant TYLER GLENN-HAYWARD altered the payee information on Check #2, without the authority or permission of victim G.M. Defendant GLENN-HAYWARD reproduced the rest of the information on Check #2, such as the issue date, agency code, check serial number, Treasury routing number, and the proper payment amount of \$173,194.

13. On or about July 12, 2024, defendant TYLER GLENN-HAYWARD caused the counterfeit Treasury check for Check #2 to be deposited at USAA Federal Savings Bank, a financial institution, via an ATM located in Annapolis, Maryland.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
(Bank Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 4 of Count One are incorporated here.
2. Wells Fargo was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, with certificate number 3511.
3. From on or about May 24, 2024, to on or about May 29, 2024, in the Eastern District of Pennsylvania, and elsewhere, defendants

**IBRAHIM TOUGOUAMA and
TYLER GLENN-HAYWARD,**

together with others, both known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Wells Fargo, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

4. Defendants IBRAHIM TOUGOUAMA and TYLER GLENN-HAYWARD, together with others both known and unknown to the grand jury, participated in a scheme to unjustly enrich themselves by possessing stolen Treasury checks assigned to be paid to legitimate payees and then altering or otherwise counterfeiting the payee information on these stolen checks, and causing and aiding and abetting the depositing of these counterfeit checks into various bank accounts.

MANNER AND MEANS

It was part of the scheme that:

5. Paragraphs 6 through 9, and Overt Acts 1 through 8, of Count One are incorporated here.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THREE
(Bank Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 4 of Count One are incorporated here.
2. USAA Federal Savings Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 34168.
3. From on or about July 11, 2024, to on or about July 12, 2024, in the Eastern District of Pennsylvania, and elsewhere, defendants

**IBRAHIM TOUGOUAMA and
TYLER GLENN-HAYWARD,**

together with others, both known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud USAA Federal Savings Bank, and to obtain monies owned by and under the care, custody, and control of USAA by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

4. Defendants IBRAHIM TOUGOUAMA and TYLER GLENN-HAYWARD, together with others both known and unknown to the grand jury participated in a scheme to unjustly enrich themselves by possessing stolen Treasury checks assigned to be paid to legitimate payees, and then altering or otherwise counterfeiting the payee information on these stolen checks, and causing and aiding and abetting the depositing of these counterfeit checks into various bank accounts.

MANNER AND MEANS

It was part of the scheme that:

5. Paragraphs 6 through 9, and Overt Acts 9 through 13, of Count One are incorporated here.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT FOUR
(Possession of Stolen Mail)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 of Count One are incorporated here.
2. On or about August 14, 2024, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

IBRAHIM TOUGOUMA

knowingly unlawfully possessed stolen United States mail knowing it to have been stolen, that is, approximately 77 pieces of United States mail, containing Treasury Checks, which had been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.

COUNT FIVE
(Possession of Stolen Mail)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 of Count One are incorporated here.
2. From in or about August 2024 through on or about September 11, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TYLER GLENN-HAYWARD

knowingly unlawfully possessed stolen United States mail knowing it to have been stolen, that is, approximately 95 pieces of United States mail, containing Treasury Checks, which had been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.

COUNTS SIX THROUGH NINE
(Theft of Government Funds)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 of Count One are incorporated here.
2. On or about the below listed dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

TYLER GLENN-HAYWARD

embezzled, stole, purloined, and knowingly converted to his use, and the use of others known and unknown to the grand jury, a thing of value of the United States in excess of \$1,000, that is, United States Treasury checks in the approximate amounts listed below, in government benefits to which the defendant knew he was not entitled, with each transaction constituting a separate count:

Count	Victim	Approx. Check Deposit Date	Approx. Amount	Federal Agency
6	L.S. altered to R.M.	April 5, 2024	\$1,555	IRS
7	D.Y.	April 8, 2024	\$1,685	SSA
8	S.V.	April 9, 2024	\$1,682	SSA
9	R.S.	April 10, 2024	\$1,590	SSA

In violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE NO. 1

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 641 and 1708, set forth in this indictment, defendants

**IBRAHIM TOUGOUIMA and
TYLER GLENN-HAYWARD**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violations, or a conspiracy to commit such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

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

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

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

NOTICE OF FORFEITURE NO. 2

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344, set forth in this indictment, defendants

**IBRAHIM TOUGOUIMA and
TYLER GLENN-HAYWARD**

shall forfeit to the United States of America any property constituting, or derived from, proceeds the person obtained directly or indirectly, as a result of such violations, including, but not limited to, the sum of \$189,120.25.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

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

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

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

A large black rectangular redaction box covering a signature.

Christine E. Angier, Esq.

DAVID METCALF
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

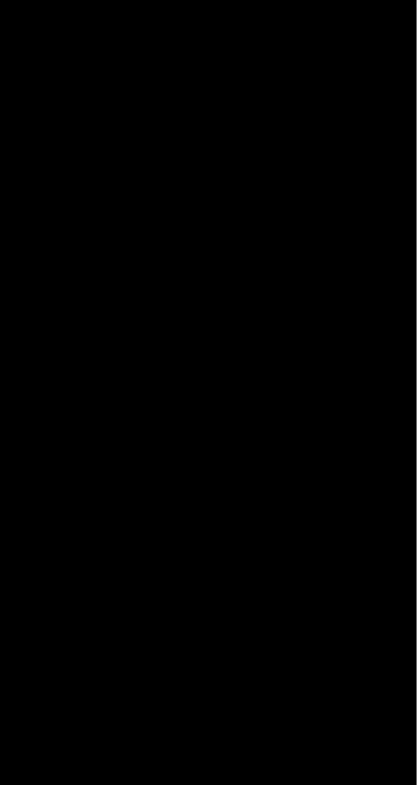
vs.

**IBRAHIM TOUGOU/MA
TYLER GLENN-HAYWARD**

INDICTMENT

18 U.S.C. § 371 (conspiracy to steal government funds – 1 count)
18 U.S.C. § 1344 (bank fraud – 2 counts)
18 U.S.C. § 1708 (possession of stolen mail – 2 counts)
18 U.S.C. § 641 (theft of government funds – 4 counts)
18 U.S.C. § 2 (aiding and abetting)

ay,



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

INDICTMENT

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia

County: Philadelphia

City and State of Defendant: See reversed side

County: See reversed side

Register number: See reversed side

Place of accident, incident, or transaction: Eastern District of Pennsylvania

Post Office: Philadelphia

County: Philadelphia

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: No

Case Number: N/A

Judge: N/A

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

1. Antitrust
2. Income Tax and other Tax Prosecutions
3. Commercial Mail Fraud
4. Controlled Substances
5. Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
6. General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)
18 U.S.C. § 371 (conspiracy to steal government funds – 1 count); 18 U.S.C. § 1344 (bank fraud – 2 counts); 18 U.S.C. § 1708 (possession of stolen mail – 2 counts); 18 U.S.C. § 641 (theft of government funds – 4 counts); 18 U.S.C. § 2 (aiding and abetting)

DATE: January 20, 2026

/s Megan Curran

MEGAN CURRAN

Special Assistant United States Attorney

File No. 2025R00308

U.S. v. IBRAHIM TOUGOUIMA and TYLER GLENN-HAYWARD

TYLER GLENN-HAYWARD
City & State: Pennsauken, NJ
County: Camden
Register # N/A

IBRAHIM TOUGOUAMA
City & State: Philadelphia, PA
County: Philadelphia
Register # N/A