AO 257 (Rev. 6/78)

[redacted]

# DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. § 371 (Count One);
18 U.S.C. § 1028A (Counts Two and Three).

☐ Petty
☐ Minor
☐ Misde-meanor
☒ Felony

PENALTY: See Attached.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

## DEFENDANT - U.S

Indigo Kiara GRAHAM, Cortez Tarmar CRAWFORD, and Trevon Demar ALLEN

DISTRICT COURT NUMBER

CR 24 0566 JST

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form: Ismail J. Ramsey

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned): Michelle J. Kane

## DEFENDANT

### IS *NOT* IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

FILED

NOV 07 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

### IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction } ☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No } If "Yes" give date filed

**DATE OF ARREST** Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED TO U.S. CUSTODY** Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:
☐ Arraignment ☐ Initial Appearance

** Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment*

Defendant Address:

Date/Time: Before Judge:

Comments:

# United States District Court

FOR THE
**NORTHERN DISTRICT OF CALIFORNIA**

VENUE: OAKLAND

FILED
NOV 07 2024
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

[redacted]

INDIGO KIARA GRAHAM,
CORTEZ TARMAR CRAWFORD, and
TREVON DEMAR ALLEN

CR 24 0566 JST

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 371 – Conspiracy;
18 U.S.C. § 1028A – Aggravated Identity Theft;
18 U.S.C. § 2 – Aiding and Abetting;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

*/S/ Foreperson of the Grand Jury*
Foreman

Filed in open court this 7th day of

November, 2024.

Lucy L. Garcia 11/7/24
Clerk

Bail, $ No ~~Process~~ Bail warrant
11/7/24

Hon. ~~Kandis A. Westmore~~ Donna Ryu, U.S. Magistrate Judge

FILED
NOV 07 2024
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

[redacted]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

| | |
|---|---|
| UNITED STATES OF AMERICA,<br><br>Plaintiff,<br><br>v.<br><br>INDIGO KIARA GRAHAM,<br>CORTEZ TARMAR CRAWFORD, and<br>TREVON DEMAR ALLEN,<br><br>Defendants. | CASE NO. CR 24 0566 JST<br><br><u>VIOLATIONS</u>:<br>18 U.S.C. § 371 – Conspiracy;<br>18 U.S.C. § 1028A – Aggravated Identity Theft;<br>18 U.S.C. § 2 – Aiding and Abetting;<br>18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation<br><br>OAKLAND VENUE<br><br>[redacted] |

INDICTMENT

The Grand Jury charges:

Introduction

At all times relevant to this Indictment:

1. From at least in or around April 17, 2023, until at least in or around May 17, 2024, INDIGO KIARA GRAHAM, CORTEZ TARMAR CRAWFORD, and TREVON DEMAR ALLEN conspired with each other and others to carry out fraudulent "SIM swap" attacks. As part of this scheme, the co-conspirators shared with each other the personal identifying information ("PII") of victims; created fraudulent identification documents in victims' names; used fraudulent identification documents to impersonate victims; took over victim cellular telephone accounts; obtained unauthorized multi-factor

authentication ("MFA") codes for various accounts; and accessed victims' online accounts for the purpose of stealing money and data.

Background Regarding SIM Swapping

2. A Subscriber Identity Module ("SIM") card is a chip that stores information identifying and authenticating a cell phone subscriber. When a cell phone carrier reassigns a phone number from one physical phone to another – such as when a customer purchases a new phone but wants to retain the same number – the carrier switches the assignment of the cell phone number from the SIM card in the old phone to the SIM card in the new phone, a process sometimes referred to as "porting" a number.

3. A SIM swap attack refers to the process of fraudulently inducing a carrier to reassign a cell phone number from the legitimate subscriber or user's SIM card to a SIM card controlled by a criminal actor. SIM swap attacks are often conducted for the purpose of defeating MFA and/or two-step verification. MFA and two-step verification add an additional layer of security to the authentication process for accessing online accounts, such as cloud storage, financial, or social media accounts. A SIM swap attack allows a criminal actor to defeat the MFA and/or two-step verification process to access a victim's account so that the criminal actor may steal money and/or data from the victim.

4. IMEI stands for International Mobile Equipment Identity. It is a unique number that identifies a mobile device.

5. ICCID stands for Integrated Circuit Card Identifier. It is a unique number that identifies a SIM card.

Co-Conspirators

6. INDIGO KIARA GRAHAM was an individual who resided in Elkhart, Indiana. GRAHAM used several online monikers, including "Blue Taylor."

7. CORTEZ TARMAR CRAWFORD was an individual who resided in South Bend, Indiana.

8. TREVON DEMAR ALLEN was an individual who resided in Elkhart, Indiana.

Other Individuals and Entities

9. An individual with the initials B.K. was the primary user of a mobile phone that had service provided by Verizon. B.K. was an employee of IGM Biosciences, Inc., and a resident of

Hillsborough, California.

10. IGM Biosciences was a biotechnology company with its headquarters in Mountain View, California.

11. An individual with the initials J.K. was the primary user of a mobile phone that had service provided by Verizon. J.K. was a resident of Massachusetts.

12. An individual with the initials M.E. was the primary user of a mobile phone that had service provided by Verizon. M.E. was an employee of Cytek Biosciences, Inc. and a resident of San Jose, California.

13. Cytek Biosciences was a pharmaceutical company with its headquarters in Fremont, California.

14. Telegram was a messaging app that allowed users to communicate both privately and with large audiences. Users could send messages, share media, and engage in video calls and voice chats. Telegram provided an option for "Secret Chats," which supported "self-destructing" messages and were end-to-end encrypted.

COUNT ONE: (18 U.S.C. § 371 – Conspiracy to Commit Aggravated Identity Theft, Traffic in Unauthorized Access Devices, and Obtain Information from a Protected Computer)

15. The factual allegations contained in paragraphs one through twelve are realleged and incorporated herein.

The Conspiracy

16. Beginning on a date unknown to the grand jury, but no later than April 17, 2023, and continuing to at least May 17, 2024, in the Northern District of California and elsewhere, the defendants,

INDIGO KIARA GRAHAM,
CORTEZ TARMAR CRAWFORD, and
TREVON DEMAR ALLEN,

and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to commit offenses against the United States, that is:

a. to knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to an enumerated felony violation as defined by Title 18, United States Code, Section 1028A(c), in violation of Title 18, United States

Code, Section 1028A(a)(l);

b. to knowingly and with intent to defraud traffic in unauthorized access devices, that is, multi-factor authentication codes obtained through SIM swapping, to obtain things of value aggregating at least $1,000 within a one-year period and, by such conducted, affect interstate and foreign commerce, in violation of Title 18, United States Code Section 1029(a)(2); and

c. to intentionally access a computer without authorization and exceed authorized access, and thereby obtain information from any protected computer, and commit the offense for purposes of commercial advantage and private financial gain, and commit the offense in furtherance of any criminal and tortious act in violation of the Constitution and laws of the United States and of any State, in violation of Title 18, United States Code, Section 1030(a)(2)(C) and (c)(2)(B)(i), (ii).

Purpose of the Conspiracy

17. The object of the conspiracy was for GRAHAM, CRAWFORD, ALLEN, and others (collectively, the "co-conspirators") to unjustly enrich themselves by targeting victims for SIM swaps, creating fraudulent identification documents in victims' names, performing SIM swaps in exchange for money, fraudulently obtaining two-factor authentication codes, accessing and stealing victims' money and data, extorting victims for money in exchange for restoring access to data, and concealing the ill-gotten funds through cryptocurrency transactions.

Manner and Means

18. Beginning on a date unknown to the grand jury, but no later than April 17, 2023, and continuing until at least May 17, 2024, GRAHAM, CRAWFORD, ALLEN, and other co-conspirators, within the Northern District of California and elsewhere, carried out the conspiracy through the following manner and means, among others:

a. It was part of the conspiracy that co-conspirators, including GRAHAM, obtained victims' PII and mobile phone identifying information from other co- conspirators for the purpose of effectuating SIM swaps;

b. It was further part of the conspiracy that co-conspirators, including GRAHAM, shared with other co-conspirators victims' PII and mobile phone identifying information via encrypted messaging services;

c. It was further part of the conspiracy that co-conspirators, including GRAHAM, purchased equipment and supplies used to make identity documents over the internet and had them shipped in interstate commerce;

d. It was further part of the conspiracy that, using victims' PII, including names and dates of birth, co-conspirators, including GRAHAM, used identification card printers to create fraudulent identification documents to be used during SIM swaps;

e. It was further part of the conspiracy that co-conspirators travelled to retail stores throughout the United States, including, but not limited to, those in California and Ohio, for the purpose of conducting, or attempting to conduct, SIM swaps;

f. It was further part of the conspiracy that co-conspirators, including GRAHAM, CRAWFORD, and ALLEN, effectuated and attempted to effectuate SIM swaps of victim phone numbers at mobile service provider stores, including Verizon, AT&T, and T-Mobile stores, by impersonating victims and presenting fraudulent identification documents to retail store employees;

g. It was further part of the conspiracy that co-conspirators, including GRAHAM, caused multiple unsolicited commercial advertisements and other unsolicited text messages to be sent to victims' phones to prevent victims from noticing the legitimate messages from mobile phone providers alerting them of the transfer of account services;

h. It was further part of the conspiracy that co-conspirators, including GRAHAM, CRAWFORD, and ALLEN, caused the unauthorized transfer of account services from phones controlled by victims to phones controlled by the co-conspirators;

i. It was further part of the conspiracy that co-conspirators, after gaining access to victim phone numbers, generated, received, and shared with other co-conspirators various MFA methods, including access device codes, to gain unauthorized access to victims' other accounts, including corporate cloud storage accounts, virtual currency exchange accounts, social media accounts, and electronic communication accounts;

j. It was further part of the conspiracy that co-conspirators exploited the unauthorized access to victims' accounts, including corporate cloud storage accounts, virtual currency exchange accounts, social media accounts, and electronic communication accounts to steal money and data from those victims for the purpose of unjustly enriching themselves;

k. It was further part of the conspiracy that co-conspirators used electronic communication accounts, including cellular service providers, email accounts, and messaging applications, to communicate about the SIM swapping scheme, including the transmission of victim PII, account access codes, and other fraudulently obtained information; and

l. It was further part of the conspiracy that co-conspirators created and used virtual currency exchange accounts for the purpose of receiving and transferring payments for SIM swapping services and stolen funds derived from unauthorized account intrusions.

Acts in Furtherance of the Conspiracy

19. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Northern District of California and elsewhere:

a. On or about April 17, 2023, a co-conspirator transmitted PII to GRAHAM via Telegram, asking her to conduct a SIM swap on the victim's phone and noting that she had not yet successfully conducted a SIM swap on an AT&T mobile phone.

b. On or about July 21, 2023, GRAHAM and a co-conspirator discussed via Telegram shipping ten mobile phones.

c. On or about August 15, 2023, GRAHAM and a co-conspirator discussed via Telegram SIM swaps and shipping identification documents.

*Victims B.K. and IGM Biosciences*

d. On or about December 22, 2023, GRAHAM and CRAWFORD entered the Verizon Store in the El Cerrito Plaza shopping center, 410 El Cerrito Plaza, El Cerrito, California.

e. On or about December 22, 2023, CRAWFORD presented false identification with his photograph and B.K.'s name to a Verizon Store employee.

f. On or about December 22, 2023, GRAHAM and CRAWFORD executed a SIM swap of B.K.'s cellular telephone account to a physical phone in GRAHAM and CRAWFORD's possession.

g. On or about December 22, 2023, while still at the Verizon Store in El Cerrito, California, GRAHAM and CRAWFORD charged $639.42 to B.K.'s Verizon account for two pairs of Beats wireless headphones.

h. On or about December 22, 2023, co-conspirators used the Microsoft One Drive security codes generated during the execution of the SIM swap to facilitate the theft of confidential IGM Biosciences data from B.K's corporate One Drive account.

*Victim J.K.*

i. On or about December 29, 2023, CRAWFORD entered the Verizon Store in the El Cerrito Plaza shopping center, 410 El Cerrito Plaza, El Cerrito, California.

j. On or about December 29, 2023, CRAWFORD presented false identification with his photograph and a variation of J.K.'s name to a Verizon Store employee.

k. On or about December 29, 2023, CRAWFORD attempted to execute a SIM swap of J.K.'s cellular telephone account to a physical phone in CRAWFORD's possession.

*Victims M.E. and Cytek Biosciences*

l. On or about February 9, 2024, a co-conspirator sent GRAHAM M.E.'s name and mobile phone number via Telegram.

m. On or about February 10, 2024, GRAHAM transmitted an image via Telegram of ALLEN's photo with M.E.'s name.

n. On or about February 10, 2024, GRAHAM and ALLEN entered the Verizon Store at 3650 Stonecreek Blvd., Cincinnati, Ohio.

o. On or about February 10, 2024, ALLEN presented false identification with his photograph and M.E.'s name to a Verizon Store employee.

p. On or about February 10, 2024, GRAHAM and ALLEN executed a SIM swap of M.E.'s cellular telephone account to a physical phone in GRAHAM and ALLEN's possession.

q. On or about February 10, 2024, co-conspirators used the MFA security codes generated during the execution of the SIM swap to facilitate the theft of confidential Cytek

Biosciences data from M.E.'s corporate Office 365/SharePoint account.

r. On or about February 11, 2024, a co-conspirator sent an email to M.E. confirming the theft of Cytek Biosciences data and asking to be contacted on a messaging platform.

s. On or about February 12, 2024, a co-conspirator sent a message to Cytek Biosciences through the messaging platform asking for payment of $9.4 million in cryptocurrency in exchange for deleting the stolen data.

*Other Victims*

t. On or about March 21, 2024, GRAHAM transmitted an image of the device information for a mobile phone via Telegram, including the IMEI and ICCID, to a co-conspirator.

u. On or about May 9, 2024, GRAHAM sent an image of a Bank of America Secured Transfer code and a Verizon authentication request message to a co-conspirator via Telegram.

v. On or about May 17, 2024, a co-conspirator sent GRAHAM images via Telegram of the front and back of a Texas driver license.

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

<u>COUNT TWO</u>: (18 U.S.C. § 1028A – Aggravated Identity Theft)

20. The factual allegations contained in paragraphs one through seventeen are realleged and incorporated herein.

21. On or about December 22, 2023, within the Northern District of California and elsewhere, the defendants,

INDIGO KIARA GRAHAM and
CORTEZ TARMAR CRAWFORD

did knowingly possess and use, without lawful authority, a means of identification of another person, that is, a counterfeit driver license bearing the name of B.K., during and in relation to violations of Title 18, United States Code, Sections 1029(a)(2), and 1030(a)(2)(C), (c)(2)(B)(i) and (ii), in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT THREE: (18 U.S.C. § 1028A – Aggravated Identity Theft)

22. The factual allegations contained in paragraphs one through seventeen are realleged and incorporated herein.

23. On or about December 29, 2023, within the Northern District of California and elsewhere, the defendants,

CORTEZ TARMAR CRAWFORD

did knowingly possess and use, without lawful authority, a means of identification of another person, that is, a counterfeit driver license bearing the name of J.K., during and in relation to violations of Title 18, United States Code, Sections 1029(a)(2), and 1030(a)(2)(C), (c)(2)(B)(i) and (ii), in violation of Title 18, United States Code, Sections 1028A(a)(1).

FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

24. The allegations contained in this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

25. Upon conviction of the offense set forth in Count One of this Indictment, the defendants,

INDIGO KIARA GRAHAM,
CORTEZ TARMAR CRAWFORD,
TREVON DEMAR ALLEN

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived from proceeds the defendant obtained directly and indirectly, as the result of those violations.

26. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

HC

DATED: 11/7/2024

A TRUE BILL.

Foreperson

FOREPERSON

ISMAIL J. RAMSEY
United States Attorney

MICHELLE J. KANE
Assistant United States Attorney