2024R00445/AE/BB

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. André M. Espinosa, U.S.M.J.
	:	
v.	:	Magistrate. No. 25-11265
	:	
WAYNE BESSANT,	:	**CRIMINAL COMPLAINT**
BRITANY BROWN,	:	
JOHN GERARD EBERT,	:	
JOSEPH GRAVES-CARMICHAEL,	:	
ANDREW HOOPER,	:	
PATRICIA KEARSE,	:	
THOMAS LEE,	:	
DWAYNE REDDON,	:	
SHABAZZ ROUZARD,	:	
CLARENCE SEMMON,	:	
RYAN SMALL, and	:	
RAYMOND WADE	:	

I, Roberto Brasile, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

Roberto Brasile, Special Agent
Homeland Security Investigations

Special Agent Roberto Brasile attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 6th day of November, 2025.

s/ André M. Espinosa

Hon. André M. Espinosa
United States Magistrate Judge

ATTACHMENT A

Count One
(Conspiracy to Commit Bank Fraud)

From in or about March 2023 to in or about June 2025, in Union, Middlesex, Mercer and Burlington Counties, in the District of New Jersey, and elsewhere, defendants

WAYNE BESSANT,
BRITANY BROWN,
JOHN GERARD EBERT,
JOSEPH GRAVES-CARMICHAEL,
ANDREW HOOPER,
PATRICIA KEARSE,
THOMAS LEE,
DWAYNE REDDON,
SHABAZZ ROUZARD,
CLARENCE SEMMON,
RYAN SMALL, and
RAYMOND WADE

knowingly and intentionally did conspire and agree with each other and others to execute a scheme and artifice to defraud financial institutions as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation and whose accounts were insured by the National Credit Union Insurance Fund, and to obtain monies, funds, assets, and other property owned by and under the custody and control of such financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

ATTACHMENT B

I, Roberto Brasile, am a Special Agent with the Homeland Security Investigations. The information contained in this complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including video surveillance, business records, bank records, and other documents. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Relevant Individuals

1. At all times relevant to this Criminal Complaint:

   a. Wayne Bessant's last known address was in Hamilton Township, New Jersey.

   b. Britany Brown's last known address was in Philadelphia, Pennsylvania.

   c. John Gerard Ebert's last known address was in Trenton, New Jersey.

   d. Joseph Graves-Carmichael's last known address was in Trenton, New Jersey.

   e. Andrew Hooper's last known address was in New Brunswick, New Jersey.

   f. Patricia Kearse's last known address was in Trenton, New Jersey.

   g. Thomas Lee's last known address was in Beverly, New Jersey.

   h. Dwayne Reddon's last known address was in Trenton, New Jersey.

   i. Shabazz Rouzard's last known address was in Ewing, New Jersey.

   j. Clarence Semmon's last known address was in Trenton, New Jersey.

k. Ryan Small's last known address was in Trenton, New Jersey.

l. Raymond Wade's last known address was in Morrisville, Pennsylvania.

Overview of the Conspiracy

2. The Defendants, Wayne Bessant ("BESSANT"), Britany Brown ("BROWN"), John Gerard Ebert ("EBERT"), Joseph Graves-Carmichael ("CARMICHAEL"), Andrew Hooper ("HOOPER"), Patricia Kearse ("KEARSE"), Thomas Lee ("LEE"), Dwayne Reddon ("REDDON"), Shabazz Rouzard ("ROUZARD"), Clarence Semmon ("SEMMON"), Ryan Small ("SMALL"), and Raymond Wade ("WADE") (collectively, the "Defendants"), in some manner, worked together and with others to enrich themselves by depositing (1) stolen commercial checks and/or (2) stolen checks issued by the United States Department of Treasury ("Treasury")[1] at various banks in New Jersey and/or Pennsylvania. The Defendants impersonated businesses and/or individuals listed as payees on the stolen checks ("Payees") to open bank accounts and deposit the stolen checks.

3. In or around March 2023, BESSANT, the facilitator of the fraudulent scheme, began organizing the operation from his home in Hamilton Township, New Jersey.

4. First, BESSANT received the stolen checks.

5. Second, BESSANT and others acquired business documents in the name of the payees on the stolen check using a combination of three methods: (1) the *Hijack Method*: where the registered agent on the Payee's official records was changed to one of the Defendants; (2) the *Spoofing Method*: where the business formation documents were applied for on behalf of fictitious companies using a name that was the same or similar to that of the Payee; and/or (3) the *Alteration Method*: where official and/or unofficial documents were altered by changing the company name, registered agent, and/or the address.

6. Third, using those documents, Bessant created and/or directed his co-defendants and/or co-conspirators to create fraudulent bank accounts in the name of the Payees, in a name similar to the Payees, in the name of a co-defendant, and/or in the name of a co-defendant's business.

[1] Many of the stolen Treasury checks were tax refunds issued by the Internal Revenue Service ("IRS") pursuant to the Employee Retention Credit ("ERC") created during the COVID-19 pandemic to encourage a business to keep employees on payroll while the business was closed.

7. Fourth, Bessant deposited the stolen checks and/or gave the stolen checks to a co-defendant and directed the co-defendant to deposit the stolen checks in the fraudulent bank accounts.

8. Fifth, the Defendants withdrew and/or transferred the proceeds to themselves.

9. As a result of the activities BESSANT directed, between in or around March 2023 and in or around June 2025, the Defendants obtained approximately 99 Treasury checks and 27 commercial checks from approximately 91 Payees, totaling approximately $12,730,162 and deposited or attempted to deposit approximately 84 Treasury checks and 27 commercial checks, totaling approximately $11,889,531 at approximately 30 financial institutions. Several illustrative examples are outlined below.

Payee-1

10. Between on or about June 25, 2023 and July 17, 2023, Defendants BESSANT, BROWN, and SEMMON (1) used the Spoofing Method and the Alteration Method to impersonate Payee-1, a healthcare provider operating in Hasbrouck Heights, New Jersey, (2) deposited three Treasury checks belonging to Payee-1 into a bank account they controlled, and (3) transferred and/or attempted to transfer the funds to accounts they controlled.

11. On or about June 25, 2023, a business charter for a company with a similar name to Payee-1 ("Fictitious Company-1") was filed with New Jersey Department of Treasury Division of Revenue and Enterprise Services ("DORES") and confirmation was emailed to BESSANT on the same day.[2] Official records for Fictitious Company-1 listed a registration date of June 25, 2023, with BROWN as the registered agent.

12. Between on or about June 25, 2023 and June 26, 2023, BESSANT emailed Co-Conspirator-1, an individual he paid to falsify documents and who resided in India, and asked him to make changes to business documents for Fictitious Company-1. These documents included the official DORES documents and an IRS Form SS-4, which identifies a company's employer identification number ("EIN"). Among other things, BESSANT instructed Co-Conspirator-1 to change Fictitious Company-1's New Jersey identification number to match Payee-1's New Jersey

[2] DORES uses an online self-service portal for individuals to electronically file business documents and/or change information related to a business. After an individual files a document and/or changes information for a business registered with DORES, an email is sent to the individual confirming the filing or change of information and often includes a link to download a copy of the new document.

identification number. Co-Conspirator-1 made the alterations and sent the falsified documents to BESSANT.

13. On or about June 26, 2023, BESSANT emailed the falsified documents to SEMMON, who at the time was in a relationship with BROWN.

14. On or about June 26, 2023, a business bank account ending in 8790 for Fictitious Company-1, was opened at a branch of Financial Institution-1[3] ("Account 8790"), using the falsified documents and listing BROWN as a signatory.

15. In the following days, BROWN deposited three Treasury checks payable to Payee-1 into the account. On or about June 28, 2023, BROWN deposited the first Treasury check for approximately $52,142.24. On or about July 6, 2023, BROWN deposited the second and third Treasury checks for approximately $31,959.76 and $107,130.23, respectively. All three checks were deposited at a branch of Financial Institution-1.

16. On or about July 7, 2023, BESSANT sent BROWN a text message containing a screenshot of an email from Co-Conspirator-1 depicting an altered DORES document for Fictitious Company-1. On or about July 15, 2023, BROWN sent BESSANT the amounts of the Treasury checks deposited in Account 8790.

17. Between on or about June 30, 2023 and on or about July 17, 2023, the following checks were made out from Account 8790 to co-defendants and/or businesses associated with a co-defendant:

Approximate Date	Approximate Amount	Payee	Intended Beneficiary
6/30/2023	$16,000	Britany Brown	BROWN
7/1/2023	$7,000	Premier Concrete Systems LLC	BESSANT
7/3/2023	$16,000	Clarence Semmon	SEMMON
7/13/2023	$2,345.33	Medly Inc.	REDDON

Payee-1 did not authorize the Treasury check deposits or the subsequent outgoing fund transfers.

[3] Financial Institution-1 is a bank headquartered in Delaware and is insured by Federal Deposit Insurance Corporation ("FDIC").

Payee-2a and Payee-2b

18. Between on or about June 3, 2023 and on or about August 30, 2023, Defendants BESSANT, SMALL, ROUZARD, and EBERT (1) used the Hijack Method, the Spoofing Method, and the Alteration Method to impersonate Payee-2a, a construction company operating in Englewood Cliffs, New Jersey, and/or Payee-2b, the owner of Payee-2a, (2) deposited a Treasury check belonging to Payee-2a and Payee-2b into a bank account they controlled, and (3) transferred funds to co-defendants.

19. On or about June 3, 2023, BESSANT emailed Co-Conspirator-1 a DORES document and instructed Co-Conspirator-1 to use the Alteration Method to change Payee-2b's name to REDDON's name and address.

20. On or about June 15, 2023, the Defendants using the Spoofing Method, filed a business charter for a company with a similar name to Payee-2a's name ("Fictitious Company-2"), and BESSANT received email confirmation from DORES.

21. Finally, on or about August 30, 2023, BESSANT hijacked the official records of Payee-2a by changing the registered agent from Payee-2b to Individual-1, an alias used by BESSANT. Later the same day, BESSANT received email confirmation of the change from DORES.

22. On or about July 5, 2023, BESSANT opened a business bank account ending in 1124 in a company name similar to Payee-2a at the branch of Financial Institution-2[4] located in Pennington, New Jersey ("Account 1124"), by using Individual-1's name and the falsified documents. On or about July 12, 2023, BESSANT deposited a Treasury check payable to Payee-2a and Payee-2b, in the amount of approximately $448,445.14 into Account 1124 at a branch of Financial Institution-2. Still images from bank video surveillance show BESSANT opening the account and depositing the Treasury check.

23. After depositing the funds, BESSANT and SMALL enlisted EBERT to impersonate Payee-2b. Between on or about July 14, 2023 and on or about July 19, 2023, SMALL texted BESSANT photographs of EBERT and discussed enlisting EBERT to impersonate Payee-2b to conduct transactions at Financial Institution-2.

24. On or about July 31, 2023, BESSANT and EBERT went to the Pennington, New Jersey branch of Financial Institution-2 to add EBERT, using Payee-2b's name, as a signatory to Account 1124. As proof of identification, EBERT provided the bank with a fraudulent driver's license bearing Payee-2b's name and

[4] Financial Institution-2 is a FDIC-insured international bank with U.S. headquarters in New York.

EBERT's picture. Still images from video surveillance confirm that EBERT, the individual who accompanied BESSANT to the Pennington, New Jersey branch of Financial Insitution-2, is the same individual depicted on the purported driver's license for Payee-2b and the same individual depicted in photographs SMALL sent to BESSANT.

25. Between on or about August 4, 2023 and on or about August 25, 2023, the following checks were made out to businesses associated with the Defendants from Account 1124.

Approximate Date	Approximate Amount	Payee	Intended Beneficiary
8/4/2023	$35,000	Medly, Inc.	REDDON
8/15/2023	$27,500	Joel Getzler Trust	CARMICHAEL
8/23/2023	$5,000	DMR Architects	BESSANT
8/23/2023	$1,500	Joker Kid Inc.	CARMICHAEL
8/23/2023	$8,800	CNS Data Inc.	BROWN
8/25/2023	$7,000	DMR Architects	BESSANT

Neither Payee-2a nor Payee-2b authorized the Treasury check deposit or the subsequent outgoing fund transfers.

Payee-3

26. Between on or about June 28, 2023 and on or about August 9, 2023, Defendants BESSANT and ROUZARD (1) used the Hijack Method, the Spoofing Method, and the Alteration Method to impersonate Payee-3, a retail store operating in Paterson, New Jersey, (2) deposited four Treasury checks belonging to Payee-3 into two bank accounts they controlled, and (3) transferred funds to an account REDDON controlled.

27. On or about July 12, 2023, Fictitious Company-3 was created to spoof Payee-3 using NJ Portal, the website that handles New Jersey's government services, and BESSANT received a confirmation email. On the same day, BESSANT emailed Co-Conspirator-1 DORES business documents for Fictitious Company-3 and asked him to change the business identification number, date, and business name to match the information for Payee-3. Co-Conspirator-1 returned the altered documents to BESSANT the same day.

28. On or about June 28, 2023, a business bank account ending 8736 was opened on behalf of Fictitious Company-3, at Financial Institution-3[5] ("Account 8736"), with ROUZARD listed as the signatory. On or about the same day, a Treasury check payable to Payee-3 for approximately $33,641.98 was deposited in Account 8736.

29. Between on or about June 28, 2023 and June 29, 2023, BESSANT and ROUZARD texted about the opening of Account 8736 and Financial Institution-3's hold on the Treasury check. BESSANT told ROUZARD that the hold was because the payee's name on the Treasury check did not match the name on Account 8736 and assured ROUZARD he would fix the mistake.

30. On or about August 1, 2023, BESSANT or a co-defendant used the Hijack Method to change the registered agent for Payee-3 from Individual-2 to ROUZARD. According to DORES records, Payee-3 was registered in New Jersey on September 11, 2019, with Individual-2 listed as the registered agent, not ROUZARD.

31. On or about August 2, 2023, ROUZARD opened a second bank account at a branch of Financial Insitution-2 located in Hamilton Township, New Jersey, in the name of Payee-3, with account ending in 0820 ("Account 0820"). In the following days, ROUZARD deposited three Treasury checks payable to Victim Payee-3 into Account 0820.

32. On or about August 4, 2023, ROUZARD deposited the first Treasury check for $35,953.45. On or about August 10, 2023, ROUZARD deposited the second and third Treasury checks in the amounts of $28,848.65 and $28,917.23, respectively. Still images of bank video surveillance places ROUZARD at a branch of Financial Institution-2 on all three days.

33. On or about August 9, 2023, the following check was issued from Account 0820.

Approximate Date	Approximate Amount	Payee	Intended Beneficiary
8/9/2023	$26,000	Medly, Inc.	REDDON

[5] Financial Institution-3 is a federal credit union headquartered in Virginia and is insured by the National Credit Union Association ("NCUA").

Payee-3 did not authorize the deposit of the Treasury check or the subsequent outgoing fund transfer.

Payee-4a and Payee-4b

34. Between on or about December 18, 2023 and on or about February 3, 2024, Defendants BESSANT and CARMICHAEL used the Hijack Method and the Alteration Method to impersonate Payee-4a, a construction company operating in Brooklyn, New York, and Payee-4b, the owner of Payee-4a. They then deposited one Treasury check belonging to Payee-4a and Payee-4b into a bank account they controlled and transferred funds to accounts in other co-defendants' control.

35. According to DORES, Payee-4a was registered as a foreign limited liability company on or about May 20, 2019, with Individual-3 listed as the registered agent. However, on or about December 18, 2023, the registered agent for Payee-4a was changed from Individual-3 to Individual-4, an alias used by BESSANT.

36. On or about December 21, 2023, BESSANT instructed Co-Conspirator-1 to modify DORES documents and an IRS SS-4 in the name of Payee-4a by replacing Individual-4's name and address as registered agent with CARMICHAEL's name and address. On or about the same date, Co-Conspirator-1 emailed BESSANT the forged documents with these alterations.

37. On or about January 4, 2024, CARMICHAEL, using the forged documents, opened a business account ending in 1716 in the name of Payee-4a at a branch of Financial Institution-4[6] located in Burlington Township, New Jersey ("Account 1716"). On or about January 11, 2024, CARMICHAEL and a known male individual enlisted to impersonate Payee-4b ("Co-Conspirator-2") went to a branch of Financial Institution-4 located in Mt. Laurel Township, New Jersey to add Payee-4b as a signatory to the account.[7]

38. On or about January 8, 2024, after Account 1716 was opened, CARMICHAEL texted BESSANT login information believed to be for that account.

39. On or about January 11, 2024, BESSANT then deposited a Treasury check payable to Payee-4a and Payee-4b for $319,536.81 into Account 1716 at a branch of Financial Institution-4 located on Joint Base Mcquire-Dix-Lakehurst in Hanover Township, New Jersey. Video surveillance shows CARMICHAEL opening the account and BESSANT depositing the Treasury check. After the risk

[6] Financial Institution-4 is an NCUA-insured federal credit union headquartered in Maryland.

[7] When adding Payee-4b to the account, Co-Conspirator-2 provided a fraudulent driver's license bearing his photograph with a misspelled version of Payee-4b's name.

management team at Financial Institution-4 emailed CARMICHAEL on or about February 15, 2024, CARMICHAEL took a screenshot of the email and texted it to BESSANT.

40. After the Treasury check was deposited, the following checks were made out from Account 1716 to various co-defendants, a business associated with a co-defendant, and Co-Conspirator-2.

Approximate Date	Approximate Amount	Payee	Intended Beneficiary
1/25/2024	$8,800	Reddon Construction	REDDON
1/25/2024	$8,000	Co-Conspirator-2	Co-Conspirator-2
1/25/2024	$8,000	Thomas Lee	LEE
1/29/2024	$9,200	Reddon Construction	REDDON
1/31/2024	$9,800	Reddon Construction	REDDON
2/1/2024	$15,500	Reddon Construction	REDDON
2/3/2024	$14,500	Reddon Construction	REDDON

Neither Payee-4a nor Payee-4b authorized the Treasury check deposit or the subsequent outgoing fund transfers.

Payee-5

41. Between on or about March 26, 2024 and April 11, 2024, Defendants BESSANT and KEARSE used the Spoofing Method to impersonate Payee-5, a trade corporation representing insurance companies in Philadelphia, Pennsylvania. They then deposited one commercial check belonging to Payee-5 into a bank account they controlled and transferred funds to LEE.

42. According to DORES, a business charter for Fictitious Company-4, a company with a similar name to Payee-5, was filed on or about March 26, 2024. On or about April 4, 2024, the registered agent for Fictitious Company-4 was changed, and BESSANT received email confirmation. According to official DORES records, KEARSE was the last registered agent for Fictitious Company-4.

43. On or about March 26, 2024 and on or about March 27, 2024, BESSANT and Co-Conspirator-1 exchanged fake DORES documents for Fictitious Company-4. On or about April 9, 2024, BESSANT emailed KEARSE business documents in the name of Payee-5.

44. On or about April 5, 2024, KEARSE opened a business bank account ending in 4907 in the name of Payee-5 at a branch of Financial Institution-5[8] located in Edison, New Jersey ("Account 4907"). On or about April 8, 2024, BESSANT deposited a commercial check payable to Payee-5 for $2,561,423.93 in Account 4907. Video surveillance shows BESSANT and KEARSE opening the account and BESSANT depositing the check.

45. The following checks from Account 4907 were made payable to LEE.

Approximate Date	Approximate Amount	Payee	Intended Beneficiary
4/9/2024	$31,900.18	Thomas Lee	LEE
4/11/2024	$42,856.30	Thomas Lee	LEE

Payee-5 did not authorize the check deposit or the subsequent outgoing fund transfers.

Payee-6

46. Between on or about July 22, 2024 and on or about August 2, 2024, Defendants BESSANT and CARMICHAEL used the Spoofing Method to impersonate Payee-6, a media partnership operating in Las Vegas, Nevada, and deposited one Treasury check payable to Payee-6 into a bank account they controlled.

47. On or about July 22, 2024, a fraudulent company was registered with DORES using Payee-6's name ("Fictitious Company-5"), and BESSANT received email confirmation.

48. Between on or about July 21, 2024 and on or about July 30, 2024, BESSANT and CARMICHAEL exchanged text messages that included personal identifying information ("PII") and other information related to Payee-6 and discussed opening an account at Financial Institution-6.[9]

[8] Financial Institution-5 is an FDIC-insured bank headquartered in Virginia.

[9] Financial Institution-6 is an FDIC-insured bank headquartered in New York.

49. On or about July 31, 2024, CARMICHAEL opened a business account ending in 3365 for Fictitious Company-5 at a branch of Financial Institution-6 ("Account 3365") and set up an online banking profile for Account 3365, which was confirmed by an email from Financial Institution-6 to BESSANT.

50. On or about August 2, 2024, BESSANT deposited a Treasury check payable to Payee-6 for approximately $175,259.99 into Account 3365 at a branch of Financial Institution-6 located in Robbinsville, New Jersey.

51. Video surveillance shows CARMICHAEL and BESSANT at the branch for Financial Institution-6 on or about both July 31, 2024 and August 2, 2024.

Payee-7

52. On or about July 29, 2024, Defendant REDDON opened a business bank account ending in 4764 for his purported company, Reddon Construction LLC, at a branch of Financial Institution-7[10] located in Hamilton Township, New Jersey ("Account 4764").

53. On or about August 3, 2024, SMALL, impersonating Payee-7, an individual operating a company in Deltona, Florida, went with REDDON to the Hamilton Township branch of Financial Institution-7 to add Payee-7 as a signatory on Account 4764. Video surveillance shows SMALL believed to be signing the updated signature card for Account 4764. On or about August 6, 2024, REDDON deposited a Treasury check payable to Payee-7 for approximately $173,194.00 into Account 4764 at the Hamilton Township branch of Financial Institution-7. Video surveillance also shows REDDON depositing the Treasury check on August 6, 2024. On or about August 6, 2024, REDDON sent BESSANT the full account number for Account 4764.

54. Payee-7 did not authorize the Treasury check deposit.

Payee-8

55. Between on or about July 8, 2024, and August 9, 2024, Defendants BESSANT and SEMMON used the Hijack Method and Spoofing Method to impersonate Payee-8, an energy company operating in Charlotte, North Carolina. They then deposited one Treasury check belonging to Payee-8 into a bank account they controlled and transferred the funds into bank accounts controlled by co-defendants.

[10] Financial Institution-7 was an FDIC-insured bank headquartered in New Jersey. In and around May 2024, Financial Institution-7 merged with Financial Institution-8, an FDIC-insured bank also headquartered in New Jersey.

56. According to DORES records, on or about November 9, 2020, Payee-8 filed as a foreign LLC in New Jersey. On or about July 8, 2024, the registered agent for Payee-8 was changed to "Christophe White".[11] On the same day a business charter was filed for a fictitious company with a similar name to Payee-8 ("Fictitious Company-6"), confirmation of which was emailed to BESSANT.

57. On or about July 31, 2024, SEMMON opened a business bank account ending 4799 in the name of Payee-8 at a branch of Financial Institution-7 located in Hamilton Township, New Jersey ("Account 4799"). On or about the same day, SEMMON asked BESSANT for the address for Financial Institution-7 before opening the account and continued to text BESSANT while he was in the bank. Video surveillance shows SEMMON entering the bank on July 31, 2024. On or about August 8, 2024, a Treasury check payable to Payee-8 for approximately $851,849.68 was deposited into Account 4799.

58. The following checks were made out from Account 4799 to various co-defendants and/or a business associated with a co-defendant.

Approximate Date	Approximate Amount	Payee	Intended Beneficiary
8/9/2024	$9,800	River North Institutional Partners LP	SMALL
8/9/2024	$20,000	Raymond Wade	WADE
8/9/2024	$18,500	Andrew Hooper	HOOPER

Payee-8 did not authorize the Treasury check deposit or subsequent outgoing fund transfers.

[11] CARMICHAEL and SEMMON opened multiple bank accounts using the alias "Christophe White" and/or "Christopher White."

Payee-9

59. Between on or about July 22, 2024 and on or about August 6, 2024, Defendants BESSANT, CARMICHAEL, SEMMON, and HOOPER used the Spoofing Method to impersonate Payee-9, a realtor operating in Carolina, Puerto Rico, deposited a Treasury check belonging to Payee-9 into a bank account they controlled, and transferred the funds to accounts controlled by the Defendants.

60. According to DORES, a business charter for a fictitious company using Payee-9's name ("Fictitious Company-7") was filed on or about July 22, 2024 and confirmation was emailed to BESSANT.

61. On or about July 18, 2024, HOOPER, opened an individual bank account ending 0612 at a branch of Financial Institution-5 ("Account 0612"). On or about August 5, 2024, HOOPER deposited a Treasury check payable to Payee-9 into Account 0612 for approximately $168,078.21. Video Surveillance shows HOOPER making the deposit at a branch of Financial Institution-5 located in North Plainfield, New Jersey.

62. To facilitate the deposit for Victim Payee-9, BESSANT communicated with three co-defendants. First, on or about July 25, 2024, BESSANT sent PII and information related to Payee-9 to CARMICHAEL. Second, on or about August 1, 2024, SEMMON texted BESSANT a screenshot of Account 0612 with HOOPER's name and Payee-9's name. Third, on or about August 13, 2023, BESSANT requested the full account number for Account 0612 from HOOPER, who provided a screenshot with the information.

63. The following checks were issued from Account 0612.

Approximate Date	Approximate Amount	Payee	Intended Beneficiary
8/6/2024	$1,500	Gregory McVay	SMALL/ REDDON
8/6/2024	$2,500	Reddon Construction	REDDON

Payee-10

64. Between on or about August 24, 2024 and September 26, 2024, Defendants BESSANT and WADE used the Spoofing Method to impersonate Payee-10, a daycare facility operating in Brooklyn, New York, and deposited two Treasury checks belonging to Payee-10 into two bank accounts they controlled.

65. According to records from Pennsylvania Department of State, articles of incorporation for a fictitious company with a name similar to Payee-10's name ("Fictitious Company-8"), were filed on or about August 24, 2024. On or about August 29, 2024, BESSANT received an email confirmation regarding the filing.

66. On or about September 4, 2024, WADE, using the official documents for Fictitious Company-8, opened a business bank account ending in 1554 for Fictitious Company-8 at a branch of Financial Institution-9[12] ("Account 1554"). On or about the same day, WADE deposited a Treasury check for approximately $30,800 made out to Payee-10. Video surveillance captures WADE at the bank.

67. A week later, on or about September 11, 2024, BESSANT texted WADE an address for Financial Institution-10.[13] On or about September 12, 2024, a second business bank account ending in 1539 for Fictitious Company-8 was opened with WADE as the sole signatory, at a branch of Financial Insitution-10 ("Account 1539"). On or about September 19, 2024, a Treasury check payable to Payee-10 for approximately $50,179.34 was deposited into Account 1539. On or about September 26, 2024, WADE texted BESSANT a screenshot of the online balance for Account 1539. Payee-10 did not authorize the deposit of the Treasury check deposit.

Payee-11

68. Between on or about January 9, 2025 to January 29, 2025, Defendants BESSANT and LEE used the Spoofing Method to impersonate Payee-11, an energy company operating in Linden, New Jersey, and deposited a Treasury check belonging to Payee-11 into a bank account they controlled.

69. On or about January 9, 2025, a fraudulent company with a name similar to Payee-11's name ("Fictitious Company-9") was registered with DORES listing LEE as the registered agent, confirmation of which was emailed to BESSANT. On or about the same day, BESSANT emailed himself DORES documents for Fictitious Company-9, altered to remove the number "1" from the company's name to match Payee-11's name.

70. On or about January 27, 2025, LEE opened a business bank account ending 8473 in the name of Payee-11 at a branch of Financial Institution-11[14] ("Account 8473"), using the altered documents Bessant emailed to himself on January 9, 2025. On or about January 29, 2025, BESSANT deposited a Treasury check

[12] Financial Institution-9 is a FDIC-insured bank headquartered in Pennsylvania.

[13] Financial Institution-10 is a FDIC-insured bank headquartered in Pennsylvania.

[14] Financial Institution-11 is a NCUA-insured federal credit union headquartered in New Jersey.

payable to Payee-11 for approximately $139,383.59 into Account 8473 at a branch of Financial Institution-11. Video surveillance shows LEE and BESSANT on January 27, 2025 and January 29, 2025, respectively.

Payee-12

71. Between on or about December 8, 2024 and on or about March 12, 2025, Defendants BESSANT and CARMICHAEL used the Spoofing Method and Alteration method to impersonate Payee-12, an investment partnership operating in Jersey City, New Jersey. They then deposited a Treasury check belonging to Payee-12 in an account they controlled and quickly withdrew the funds from the account.

72. According to official DORES records, on or about December 8, 2024, a fictitious company was created using the same name as Payee-12 ("Fictitious Company-10"), confirmation of which was emailed to BESSANT. On or about January 16, 2025, BESSANT emailed himself purported DORES documents and an IRS SS-4 in the name of Payee-12 with Individual-5 listed as the registered agent.

73. On or about January 29, 2025, according to an email from NJ Portal to BESSANT, the registered agent for Fictitious Company-10 was changed. On or about the same day, BESSANT emailed himself DORES documents and an IRS SS-4 for Fictitious Company-10 with LEE listed as the registered agent. Then, on or about March 6, 2025, BESSANT emailed himself DORES documents and an IRS SS-4 that were identical to the documents sent on January 29, 2025, except the address was changed and registered agent was changed to "Christophe White".

74. On or about March 8, 2025, CARMICHAEL, using the name "Christopher White" and the altered documents BESSANT sent himself on March 6, 2025, opened a business bank account ending 2629 in the name of Payee-12 at a branch of Financial Insitution-12[15] located in Flemington, New Jersey ("Account 2629"). On or about March 12, 2025, BESSANT deposited a Treasury check payable to Payee-12 for approximately $536,153.82 at a branch of Financial Insitution-12 located in Edison, New Jersey. Video surveillance captures BESSANT and CARMICHAEL opening the account and BESSANT depositing the Treasury check at the respective branch locations. Video surveillance also captures BESSANT making numerous ATM withdrawals after the deposit at a branch of Financial Insitution-12 located in Lawrenceville, New Jersey. Payee-12 did not authorize the Treasury check deposit.

[15] Financial Institution-12 is a NCUA-insured federal credit union headquartered in New Jersey.

Payee-13a and Payee-13b

75. On March 13, 2025, law enforcement lawfully searched BESSANT's home pursuant to a search warrant.

76. On or about May 29, 2025, after law enforcement searched BESSANT's home, a known female individual ("Co-Conspirator-3"), opened a business bank account ending 1343 in the name of Payee-13a, a manufacturing company operating in Waunakee, Wisconsin, at a branch of Financial Institution-13[16] ("Account 1343"). Video surveillance shows Co-Conspirator-3 opening the account

77. On or about June 5, 2025, Co-Conspirator-3 added Payee-13b, the owner of Payee-13a, impersonated by an unknown male individual ("Individual-6"), to Account 1343. On or about the same day, BESSANT deposited a Treasury check payable to Payee-13a and Payee-13b for approximately $262,268.12 in Account 1343. Video surveillance shows Co-Conspirator-3 and Individual-6 adding Payee13-b's name to the account and shows BESSANT depositing the Treasury check. Neither Payee-13a nor Payee-13b authorized the deposit of the Treasury check.

[16] Financial Institution-13 is a FDIC-insured bank headquartered in New Jersey.