

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DIOR JAY-JARRETT,

Defendant.

**SEALED COMPLAINT**

Violation of 18 U.S.C. § 1343

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

AARON GREENBERG, being duly sworn, deposes and says that he is a Special Agent with the United States Attorney's Office for the Southern District of New York, and charges as follows:

**COUNT ONE**  
**(Wire Fraud)**

1. From at least in or about October 2021 through at least in or about September 2024, in the Southern District of New York and elsewhere, DIOR JAY-JARRETT, the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, JAY-JARRETT engaged in scheme to falsify military deployment documents in order to obtain free travel benefits, and sent and received, and caused others to send and receive, electronic communications, to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Section 1343.)

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

2. I have been personally involved in the investigation of this matter. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part.

**The Defendant Lied About His Military Service to Take Free Vacations**

3. For the reasons that follow, I believe that DIOR JAY-JARRETT, the defendant, a federal law enforcement officer and retired Marine, falsified military deployment documents in order to obtain travel benefits for which he otherwise would not have been eligible. Specifically,

based on my participation in the investigation of this matter, my conversations with other law enforcement agents, my review of documents and other records, and my interviews with various involved individuals, I have learned, in substance and in part, the following:

a. According to Department of the Navy records, JAY-JARRETT served on active-duty in the United States Marine Corps from on or about December 9, 2013, until he was medically retired on or about November 29, 2022. JAY-JARRETT attained the rank of Staff Sergeant before his retirement.

b. Based on my conversations with officials from a major airline (“Airline-1”), as well as documents provided by Airline-1, I have learned that, while still on active-duty, on or about October 20, 2021, JAY-JARRETT also began employment as a baggage handler for Airline-1. After completing approximately one week of training, JAY-JARRETT requested and received from Airline-1 an approximately eight-month period of military leave by submitting falsified documents purporting to be Marine Corps orders he in fact had never been issued. In documents he provided to Airline-1, JAY-JARRETT claimed that the Marine Corps had ordered him on or about October 23, 2021, to report for duty in Kuwait beginning on or about November 12, 2021. The purported Marine Corps document was signed with the name of a military official who had, according to Department of Defense records, retired in 1997. In fact, according to authentic military documents, JAY-JARRETT had been assigned to duty as a military guard in Garden City, New York, guarding the 1<sup>st</sup> Marine Corps District Headquarters between in or about July 2020 until his retirement in 2022.

c. In or about June 2023, JAY-JARRETT again submitted falsified documents to Airline-1 in order to receive another extended, approximately two-and-a-half-year long period of further military leave. In those documents, JAY-JARRETT claimed to still be in active-duty military service, when in fact he had already retired from the military in or about November 2022. JAY-JARRETT falsely claimed in an email to be “deploy[ed]” to the “South West Border right now,” and said he was “unsure when I’ll be able to return to work.” He falsely claimed that “11/29/2025 is the end date of my contract as of right now.” JAY-JARRETT attached a falsified document which claimed he would be on duty in New York beginning on or about June 27, 2023, for a period of three years. The document was signed “J. W. Bordgurt,” a purported Marine Corps official who, according to a search of the Department of Defense Person Search database, appears to not exist.<sup>1</sup>

d. On or about July 17, 2024, JAY-JARRETT again submitted falsified military orders to Airline-1, forwarding the same orders he provided the previous year. JAY-JARRETT wrote in an email that the document represented his “most recent, and current orders which should take me through the end of my military contract” and that he did not “intend to re-enlist.” In fact, according to Department of the Navy records, JAY-JARRETT had retired from the Marine Corps more than a year and a half earlier. JAY-JARRETT claimed, in his email to an employee at Airline-1, that he “hope[d] to rejoin you guys [at Airline-1] soon!”

e. Based on my conversations with Airline-1 officials, I have learned that, by submitting falsified documents, JAY-JARRETT became entitled to military leave and Airline-1

---

<sup>1</sup> JAY-JARRETT’s signature also appears on the falsified document. I recognize his signature as resembling the signature as it appears on his New York driver’s license.

travel privileges without actually performing work as a baggage handler. According to employment records, rather than start work at Airline-1 in 2021, JAY-JARRETT instead continued working both as a military guard—while still on fulltime active-duty in Garden City, New York—and simultaneously as a Loss Prevention Lead at a sporting goods store (“Retailer-1”) in Garden City, a second job he began in or about March 2021.<sup>2</sup> JAY-JARRETT remained on military leave at Airline-1 even as he became a Federal Air Marshal with the Department of Homeland Security in or about October 2022, shortly before he retired from the Marine Corps.<sup>3</sup>

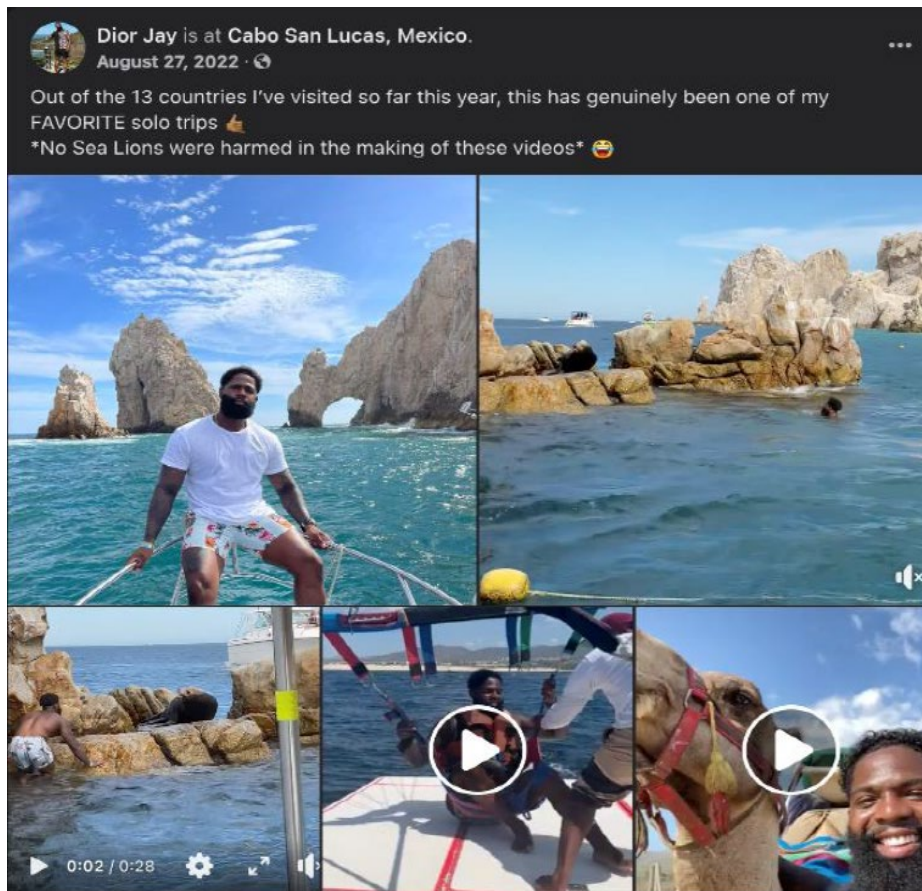
f. According to payroll records from each employer, JAY-JARRETT earned approximately \$90,000 per year as a military Staff Sergeant shortly before his retirement, \$24.50 per hour at Retailer-1 in 2021, and \$69,873 per year as his starting salary as a Federal Air Marshal—increasing to \$127,704 by 2023. By contrast, according to employment documents from Airline-1, JAY-JARRETT would have earned only \$17 per hour as a baggage handler. Because JAY-JARRETT continuously worked multiple, fulltime, and higher-paying jobs between 2021 and the present, I believe he never intended to actually begin work as a baggage handler at Airline-1.

g. Based on my conversations with Airline-1 officials, I have learned that, by remaining on long-term military leave at Airline-1, JAY-JARRETT remained entitled to travel benefits including the ability to take unlimited, free flights on Airline-1 alongside ticketed family members or travel companions (who generally paid for a portion of their tickets, but at reduced rates). From in or about November 2021 through September 2024, JAY-JARRETT took at least 130 such flights—and his family and friends approximately 20 more—at a value of nearly \$70,000. For example, JAY-JARRETT took a five-day trip to Cabo San Lucas at Airline-1’s expense in or about August 2022, which he described on his Facebook page as being in one of 13 countries he had visited that year:

---

<sup>2</sup> According to employment documents, JAY-JARRETT also took military leave from Retailer-1 between on or about June 16, 2022, and on or about June 15, 2023. On or about July 3, 2022, JAY-JARRETT provided Retailer-1 falsified military orders claiming he would be stationed in Las Vegas, Nevada, for the following year. The orders were signed by “Dior Jay-Jarrett” and purported to be authorized by a Marine Corps official identified as “J.W. Bordgurt.” On the basis of my conversations with an official from Retailer-1, I believe JAY-JARRETT may have maintained an extended military leave at Retailer-1 in order to benefit from the store’s employee discount.

<sup>3</sup> Federal Air Marshals are law enforcement officers who provide in-flight security.



h. Based on my review of Airline-1’s employment policies, I have learned that JAY-JARRETT’s false statements to Airline-1 were prohibited by those employment policies, which prohibit making misrepresentations in employment applications and “obtaining a leave of absence by false pretense.” JAY-JARRETT signed a document, dated October 15, 2021, acknowledging he had received the policies and agreed to abide by them.

i. Employment documents completed by JAY-JARRETT as part of his application to become a Federal Air Marshal indicate that he was aware his active-duty military service would end in or about November 2022. In signed, sworn documents JAY-JARRETT submitted in or about July 2022, JAY-JARRETT hand-wrote that he would soon be “medically retired from the United States Marine Corps.”

j. Documents obtained from the Transportation Security Administration (“TSA”) indicate that JAY-JARRETT initially sought to conceal his ongoing employment at Airline-1 when he applied to become a Federal Air Marshal, failing to disclose his shadow employment on his application for a security clearance. During a personnel security interview conducted in or about November 2022, JAY-JARRETT admitted, in sum and substance, that he attended training but said he never started work at Airline-1, taking military leave because he was unable to work as a baggage handler in addition to his active military service. He did not disclose that he continued to remain on extended military leave at Airline-1. Only weeks before, JAY-JARRETT took six free Airline-1 flights, including to Phoenix, Barbados, and London—including a flight from New York to London in first class. Later, in an email he sent from his personal email

address to his TSA account in or about August 2023, JAY-JARRETT attached a resume listing his work as a Federal Air Marshal, at Retailer-1, and in the military, but excluding his employment at Airline-1.

k. In a voluntary statement made to Airline-1 Corporate Security in or about August 2024, JAY-JARRETT admitted, in sum and substance, that his fulltime job at the time was working as a Federal Air Marshal, but that he had also taken a “part time” baggage handler job with Airline-1 for the travel benefits.

l. In text messages sent to a girlfriend on or about April 3, 2023, JAY-JARRETT explained that he “got a discount” he could give her to take Airline-1 flights, but she responded that she was hesitant to take up his offer, asking “should you be using that for yourself?” and explaining, “just understand I’m not used to this . . .” JAY-JARRETT expressed reluctance to answer the question, explaining with frustration that he had “resent my same message pertaining to my discount twice.” When JAY-JARRETT’s girlfriend asked, “How do you get that benefit?” he declined to explain further, saying only “I explained it to you already.”

m. JAY-JARRETT also repeatedly messaged his girlfriend on or about August 4, 2024, when he began to worry that his scheme would be uncovered. That morning, JAY-JARRETT and his girlfriend traveled to JFK Airport for an Airline-1 flight to San Antonio, Texas. According to Airline-1 officials, JAY-JARRETT used his Security Identification Display Area (“SIDA”) credentials in order to bypass the security line and then requested to complete Airline-1 paperwork permitting him to fly with his TSA service weapon.<sup>4</sup> A gate agent, confused that an employee flying stand-by on personal travel would also be carrying a weapon as a Federal Air Marshal, notified Corporate Security. JAY-JARRETT explained to an Airline-1 security supervisor that in addition to working as an Airline-1 crewmember, he was a Federal Air Marshal, providing his TSA credentials. Later that day, JAY-JARRETT texted his girlfriend that “I think I just walked into a trap,” explaining that he had been asked to provide Airline-1 with the paperwork he had completed. The “[i]ssue with that is on multiple fronts,” JAY-JARRETT explained, writing that “For [the Federal Air Marshals], I went through [security] with my [SIDA credentials]. For Airline-1[,] they’ve just got something with my signature and info on it. . . . I just have a funny feeling.” JAY-JARRETT added, “I’m just hoping nothing comes from this.” I understand these messages to indicate, in sum and substance, that JAY-JARRETT feared that any subsequent Airline-1 investigation would inevitably discover that JAY-JARRETT was actually working fulltime as a Federal Air Marshal and was not in fact deployed with the Marine Corps or eligible for military leave from Airline-1.

n. On or about September 29, 2024, during an interview I conducted along with another law enforcement official, JAY-JARRETT admitted, in sum and substance, that he retired from the Marine Corps in November 2022 but never notified Airline-1 that he had done so. JAY-JARRETT said, “With [Airline-1], I never really officially [started] work[ing] for them” and he later “never submitted [a document indicating] . . . I’m leaving here from you guys.” JAY-JARRETT identified his signature on falsified military deployment documents and admitted that he was never actually deployed to Kuwait. JAY-JARRETT said that “I just asked somebody in my admin, ‘Hey can you just, you know, draft me up a pair of orders so just I can provide it to

---

<sup>4</sup> SIDA credentials are issued to certain airport employees and law enforcement officials to bypass normal security protocols.

[Airline-1]? . . . All they need is a pair of military orders, it doesn't matter, I just need military orders to provide to them.” JAY-JARRETT explained that, in order to submit an additional set of falsified orders, “Once it was sent to me, I had it, so all I had to do was just change it to whatever it is that I needed at that time.”

o. Over the course of the scheme, from at least in or about December 2021 through in or about September 2024, based on my review of Airline-1 travel documents, I have learned that JAY-JARRETT took free first-class flights to Los Angeles, London, San Diego, St. George's, Las Vegas, and Dublin, and dozens more standard class flights to destinations including Antigua (five times), Aruba (three times), Bermuda (three times), Curaçao (twice), Barbados (twice), Belize (twice), the Grand Caymans (twice), Grenada (twice), Guatemala (twice), and a variety of other destinations including Mexico, Trinidad and Tobago, Peru, Jamaica, Turks and Caicos, the Dominican Republic, and St. Maarten. JAY-JARRETT electronically made or modified at least one reservation as part of the scheme while in the Southern District of New York.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of DIOR JAY-JARRETT, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

---

AARON GREENBERG  
Special Agent  
United States Attorney's Office  
for the Southern District of New York

Sworn to me on this 19th day of March, 2025

---

THE HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York