AUSA: Dana R. McCann

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

26 Mag 2988

UNITED STATES OF AMERICA

v.

CATORA NOEL,
DARREN STEPHENSON, and
IMANI-KAI BROWN,

Defendants.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1349, 1028A, 1029, and 2

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

MELWIN GEEVARGHESE, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Bank Fraud Conspiracy)

1. From at least in or about July 2022 through at least in or about September 2024, in the Southern District of New York and elsewhere, CATORA NOEL, DARREN STEPHENSON, and IMANI-KAI BROWN, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that CATORA NOEL, DARREN STEPHENSON, and IMANI-KAI BROWN, the defendants, and others known and unknown, knowingly would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, NOEL, STEPHENSON, and BROWN agreed to make and cause to be made false statements to a particular bank ("Victim Institution-1") in order to obtain funds.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Aggravated Identity Theft**)**

3. From at least in or about July 2022 through at least in or about September 2024, in the Southern District of New York and elsewhere, CATORA NOEL, DARREN STEPHENSON, and IMANI-KAI BROWN, the defendants, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony

violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, NOEL, STEPHENSON, and BROWN used and transferred the names, dates of birth, social security numbers, and debit card numbers of other persons during and in relation to the conspiracy to commit bank fraud charged in Count One of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

COUNT THREE
(Access Device Fraud**)**

4. In or about April 2024, in the Southern District of New York and elsewhere, CATORA NOEL, the defendant, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, attempted to and did traffic in and use one and more unauthorized access devices and by such conduct did obtain something of value aggregating $1,000 or more, to wit, NOEL used and trafficked in debit cards obtained by fraudulent means to unlawfully obtain over $40,000 in goods.

(Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.)

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

5. I have been a Special Agent with the FBI for approximately six years. I have been personally involved in the investigation of this matter. I am familiar with the information contained in this Complaint based on my participation in the investigation, my review of documents, surveillance footage and other records and reports, my conversations with other law enforcement personnel, and my training and experience. Because this Complaint is being submitted for the limited purpose of demonstrating probable cause, I have not included 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, except where otherwise indicated.

Overview of the Fraud Scheme

6. As set forth below, there is probable cause to believe that, for nearly two years, from at least in or about July 2022 to at least in or about September 2024, DARREN STEPHENSON, CATORA NOEL, and IMANI-KAI BROWN, the defendants, participated in an identity theft scam and related fraud operation involving Victim Institution-1 (the "Fraud Scheme"). By way of overview, the Fraud Scheme operated as follows:

a. One or more of the Fraud Scheme participants, including NOEL, intercepted new or replacement bank debit cards that Victim Institution-1, a bank with locations throughout the Southern District of New York, mailed to customers. The defendants, including NOEL, unlawfully obtained customers' bank debit cards by, among other means:

i. stealing bank debit cards from mail deposits; and

ii. placing inbound recorded calls to Victim Institution-1, impersonating Victim Institution-1 customers by providing the customer's name, personal identifying information ("PII"), and debit card number, and requesting that Victim Institution-1 mail a bank debit card for the customer's account to an address accessible to the defendants or their co-conspirators.

b. STEPHENSON, NOEL, and BROWN communicated through, among other means, text messages and an encrypted messaging application (the "Encrypted Messaging Application") and exchanged the information, including names, PII, and bank card and account numbers, of customers of Financial Institution-1 and other financial institutions. STEPHENSON, a Victim Institution-1 employee, used his privileged access to customer account information to steal this PII and provide it to his co-conspirators in furtherance of the Fraud Scheme.

c. NOEL then posed as bank customers with Victim Institution-1 to conduct unauthorized and fraudulent transactions, including wire transfers, teller withdrawals, and automated teller machine ("ATM") withdrawals. Specifically, NOEL posed as bank customers by calling and visiting Victim Institution-1, providing the customer's PII and account information, and requesting a wire transfer or withdrawal of funds from the customer's Victim Institution-1 account to another bank account. Alternatively, NOEL would use the intercepted bank cards to conduct fraudulent withdrawals from ATM machines.

CATORA NOEL and DARREN STEPHENSON Exchange Stolen Victim Identifying Information to Use in the Fraud Scheme

7. As set forth below, between in or about May 2024 and September 2024, CATORA NOEL and DARREN STEPHENSON, the defendants, exchanged the PII of customers of Victim Institution-1.

8. Based on my conversations with other law enforcement officers, my review of the data from a cellphone seized from CATORA NOEL, the defendant, and searched pursuant to a judicially authorized search warrant, my review of law enforcement reports and records, as well as records from Victim Institution-1, including a report of Victim Institution-1's interview of DARREN STEPHENSON, the defendant, I have learned, among other things, the following:

a. Between in or about January 2022 and October 2024, STEPHENSON was employed as a bank teller at a branch of Victim Institution-1 located in Westbury, New York.

b. Between in or about May 2024 and September 2024, STEPHENSON and NOEL exchanged information of bank customers. Specifically, NOEL sent STEPHENSON photos of what appear to be stolen debit cards belonging to customers of Victim Institution-1 and, in response, STEPHENSON accessed Victim Institution-1's internal systems to obtain and provide customer account information to NOEL and other co-conspirators. For example:

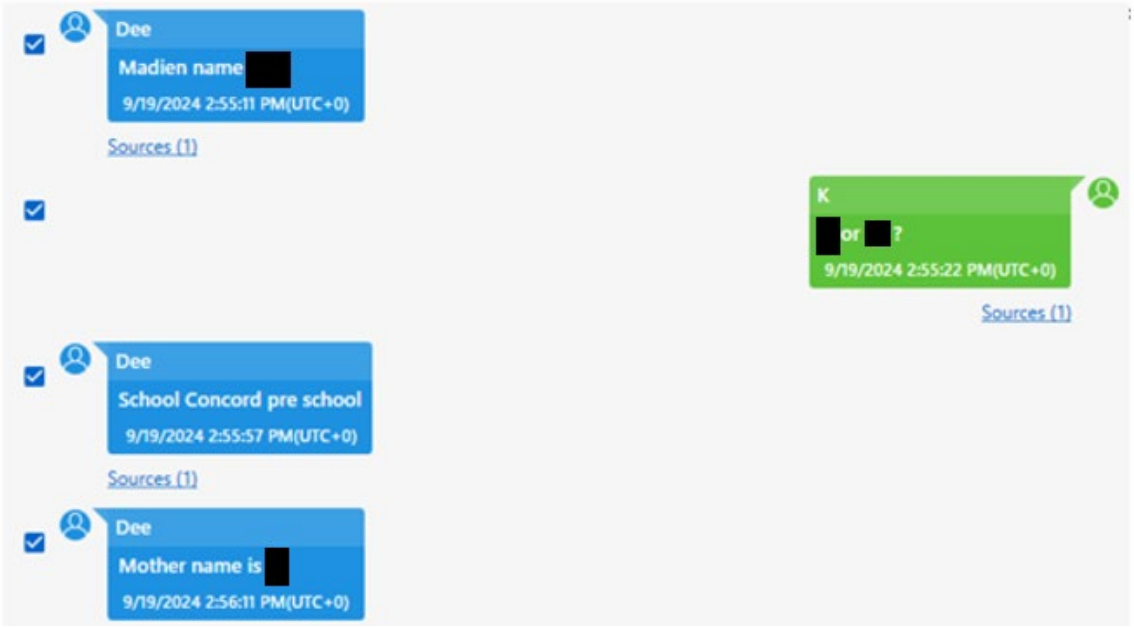
i. On or about August 22, 2024, NOEL provided STEPHENSON with the name, residential address, social security number, and date of birth of a Victim Institution-1 customer. NOEL asked STEPHENSON to provide the maiden name and school associated with the customer's account, which I believe, based on my training and experience, to be an attempt to gather personal information that could be used to fraudulently verify the customer's identity in communications with Victim Institution-1. The following day, on or about August 23, 2024,

STEPHENSON messaged NOEL the maiden name and school associated with the customer's account.

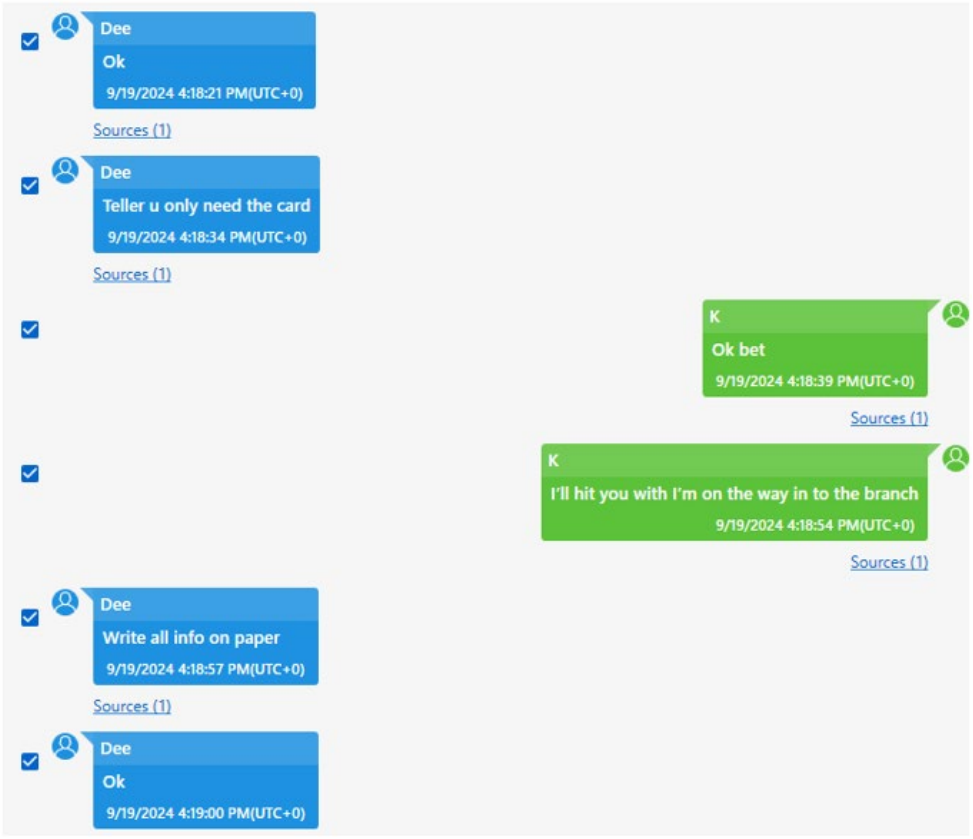
ii. On or about August 28, 2024, NOEL provided STEPHENSON with photos of two different bank debit cards from Victim Institution-1 depicting the names of victims of the Fraud Scheme. NOEL also sent the address of one of the victims to STEPHENSON.

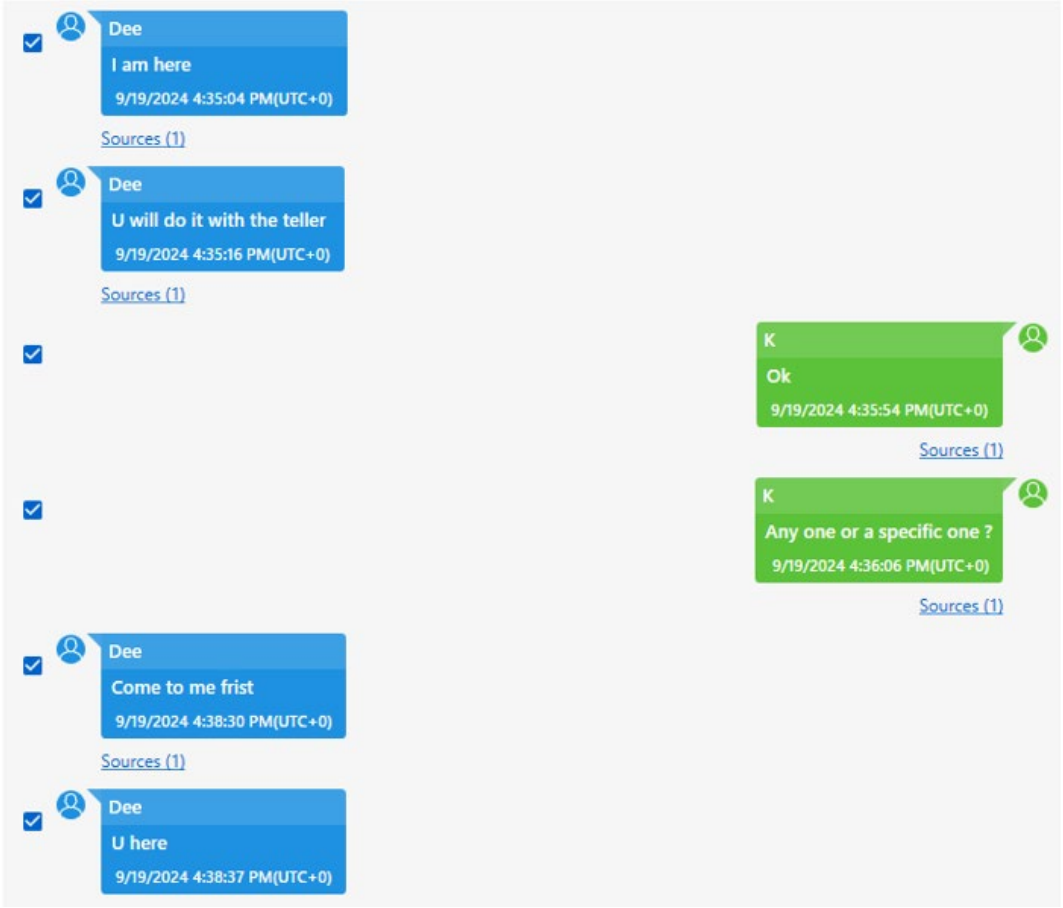
iii. On or about September 19, 2024, STEPHENSON messaged NOEL the maiden name and school associated with a bank account belonging to another customer of Victim Institution-1 ("Victim-1"). As discussed below, on or about September 19, 2024, and September 20, 2024, NOEL visited a Victim Institution-1 branch located in Westbury, New York—the same branch where STEPHENSON was employed— to initiate fraudulent wire transfers from the bank account belonging to Victim-1. *See infra* ¶ 13.a.ix. While employed as a bank teller at Victim Institution-1, STEPHENSON also facilitated the fraudulent wire transfers from Victim-1's bank account by, for example, directing NOEL to make her requests to certain bank tellers at the branch location.

iv. Screenshots of messages between STEPHENSON (in blue) and NOEL (in green) on or about September 19, 2024, are depicted below and show STEPHENSON and NOEL exchanging victim identifying information for use in the Fraud Scheme: [1]

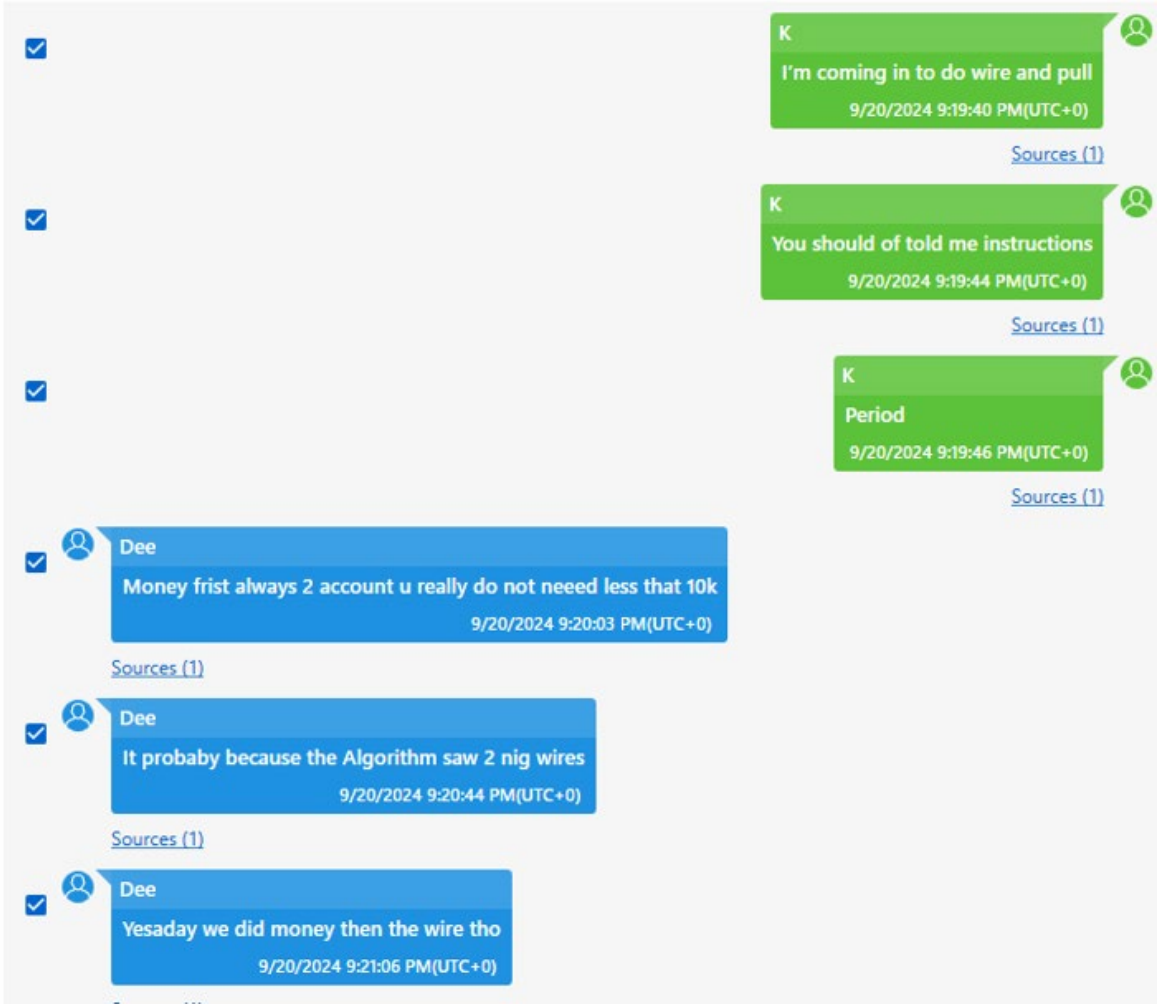


[1] I believe the messages in blue under the name "Dee" are from STEPHENSON because the phone number associated with the blue-colored messages is the same one that STEPHENSON provided Victim Institution-1 in connection with his employment at Victim Institution-1.


Dee
Ok
9/19/2024 4:18:21 PM(UTC+0)
Sources (1)
Dee
Teller u only need the card
9/19/2024 4:18:34 PM(UTC+0)
Sources (1)
K
Ok bet
9/19/2024 4:18:39 PM(UTC+0)
Sources (1)
K
I'll hit you with I'm on the way in to the branch
9/19/2024 4:18:54 PM(UTC+0)
Sources (1)
Dee
Write all info on paper
9/19/2024 4:18:57 PM(UTC+0)
Sources (1)
Dee
Ok
9/19/2024 4:19:00 PM(UTC+0)



v. Screenshots of messages between STEPHENSON (in blue) and NOEL (in green) on or about September 20, 2024, are depicted below, and further show STEPHENSON and NOEL discussing fraudulent wire transfers using the stolen victim account information:



9. Based on my conversations with other law enforcement officers, my review of records and reports from Victim Institution-1, including Victim Institution-1's interview of DARREN STEPHENSON, the defendant, on or about October 21, 2024, I have learned, in substance and in part, the following:

a. Records from Victim Institution-1 reflect that STEPHENSON accessed bank accounts of Fraud Scheme victims in as early as July 2022.

b. In addition, STEPHENSON told investigators from Victim Institution-1 that CATORA NOEL, the defendant, agreed to pay STEPHENSON in exchange for the customer account information that STEPHENSON provided.

c. STEPHENSON also explained that at least a portion of the funds received from the fraudulent transactions were used to purchase Apple products.

Identification of IMANI-KAI BROWN as a Participant in the Fraud Scheme

10. Based on my participation in this investigation, including my conversations with other law enforcement officers, my review of a cellphone seized from CATORA NOEL, the defendant, and searched pursuant to a judicially authorized warrant, records from credit-reporting agencies, and records received from an airline company and a car rental company, I have learned, among other things, the following:

a. Between at least in or about January 2024 and September 25, 2024, NOEL routinely communicated through the Encrypted Messaging Application with an individual, who used a particular phone number (the "BROWN Phone Number"), later attributed to IMANI-KAI BROWN, the defendant, and is saved as a contact in NOEL's cellphone under the name "Scottie."

b. Records received from an airline and car rental company reflect that an individual named "ImaniKai Brown" has listed the BROWN Phone Number in connection with specific flight and rental car reservations. For example:

i. On or about November 30, 2023, "ImaniKai Brown" booked a flight and provided an email address that contains the name "ImaniKai Brown," a date of birth, and the BROWN Phone Number.

ii. On or about February 22, 2024, "ImaniKai Brown" rented a car at LaGuardia Airport in Queens, New York and provided an email address that contains the name "ImaniKai Brown," a date of birth, and the BROWN Phone Number. In addition, "ImaniKai Brown" provided a residential address in connection with the car renter's account profile.

c. In addition, IMANI-KAI BROWN's date of birth and home address in records provided by a credit-reporting company are the same date of birth and residential address that "ImaniKai Brown" provided in connection with the above-mentioned flight and car rental reservations, with which an individual named "ImaniKai Brown" has provided the BROWN Phone Number as a contact phone number.

d. Accordingly, I believe that IMANI-KAI BROWN used the BROWN Phone Number from at least in or about January 2024 and September 2024 to communicate with CATORA NOEL, including about the Fraud Scheme.

CATORA NOEL and IMANI-KAI BROWN Exchange Stolen Victim Identifying Information to Use in the Fraud Scheme

11. As described below, between in or about January 2024 and September 2024, CATORA NOEL and IMANI-KAI BROWN, the defendants, communicated by Encrypted Messaging Application and exchanged the stolen PII of customers of Victim Institution-1 in connection with the Fraud Scheme.

12. Specifically, based on my conversations with other law enforcement officers, my review of law enforcement reports and records, as well as records from Victim Institution-1, my review of the data from the cellphone of CATORA NOEL, the defendant, searched pursuant to a judicially authorized warrant, and surveillance photos, I have learned, among other things, the following:

a. On or about April 15, 2024, IMANI-KAI BROWN, the defendant, sent NOEL a message on the Encrypted Messaging Application providing the name, date of birth, address, and social security number of a customer ("Victim-2") of Victim Institution-1, which NOEL used on the same day to call Victim Institution-1 and fraudulently obtain Victim-2's account information to use in the Fraud Scheme. *See infra* ¶ 15.a.i.

b. On or about April 19, 2024, BROWN sent NOEL a message on the Encrypted Messaging Application providing the name, date of birth, and social security number of a customer ("Victim-3") of Victim Institution-1, which NOEL used on the same day to call Victim Institution-1 to fraudulently obtain Victim-3's account information. *See infra* ¶ 15.a.ii. In addition, BROWN sent NOEL a photo of a fraudulent New Jersey State ID, which depicts NOEL's photo and contains the name, date of birth, and residential address of Victim-3.

c. On or about April 30, 2024, BROWN used the Encrypted Messaging Application to send NOEL a message containing the full name, residential address, date of birth, and social security number of a customer ("Victim-4") of Victim Institution-1.

d. On or about the same date, surveillance photos reflect that NOEL visited two Apple Stores located in New York, New York and Brooklyn, New York. NOEL used a debit card belonging to Victim-4 to purchase approximately $40,541.77 in merchandise.

e. On or about the same date, NOEL and BROWN exchanged messages on the Encrypted Messaging Application related to Apple store purchases, which amounted to approximately $38,000. Specifically, NOEL sent BROWN a message on the Encrypted Messaging Application with the following information: three "iPhone pro max 512 gb" for $1,399 each; one "se [Apple] watch" for $249; five "16 inch MacBook Pro" laptops for $3,999 each, and four "14 inch MacBook Pro" laptops for $3,199 each). The images below depict those messages between NOEL (in green) and BROWN (in blue) on or about April 30, 2024:[2]

[2] The phone numbers shown in these images reflect call numbers assigned by the Encrypted Messaging Application and to a user's Encrypted Messaging Application account. Accordingly, the number associated with the Encrypted Messaging Application may not match the call number assigned to the phone from which an individual uses to access the Encrypted Messaging Application.

f. On or about May 9, 2024, Victim-4 filed a complaint with the New York City Police Department ("NYPD") and reported unauthorized transactions on a debit card issued in her name in the amount of approximately $40,541.77 at two different Apple stores from on or about April 30, 2024. Victim-4 reported that she was supposed to receive a debit card in the mail but never

received it. Victim-4 also reported that her phone was SIM swapped, and her cellphone number was used to activate the debit card.[3]

g. Furthermore, between in or about January 2024 and September 2024, BROWN and NOEL exchanged messages on the Encrypted Messaging Application regarding BROWN traveling to various Bank branches with NOEL in furtherance of the Fraud Scheme. For example:

i. On or about March 18, 2024, BROWN sent NOEL the address of a branch of Victim Institution-1 located on Broadway in New York, New York, and NOEL responded that she was walking to the branch location.

ii. On or about September 16, 2024, BROWN sent NOEL an address of a bank branch of Victim Institution-1, and BROWN and NOEL discussed meeting nearby.

iii. On or about September 25, 2024, BROWN also sent NOEL the name, address, date of birth, and social security number of a bank customer ("Victim-5"), whom NOEL impersonated on the same date. *See infra* ¶ 14.a.

iv. On or about September 24, 2024, the day before NOEL's arrest in Memphis, Tennessee, BROWN sent NOEL a screenshot of a next-day flight from New York to Memphis, Tennessee. On or about September 25, 2024, BROWN and NOEL discussed traveling to the airport. On the same date, BROWN sent NOEL the phone number of a bank customer ("Victim-6"), whom NOEL impersonated on or about September 25, 2024. *See infra* ¶ 14.b.

The Fraudulent Transactions

13. Based on my conversations with other individuals, including other law enforcement officers and employees of Victim Institution-1, and my review of law enforcement reports and records provided by Victim Institution-1, including Victim Institution-1's surveillance video and transaction history of bank accounts belonging to customers of Victim Institution-1, I have learned, among other things, the following:

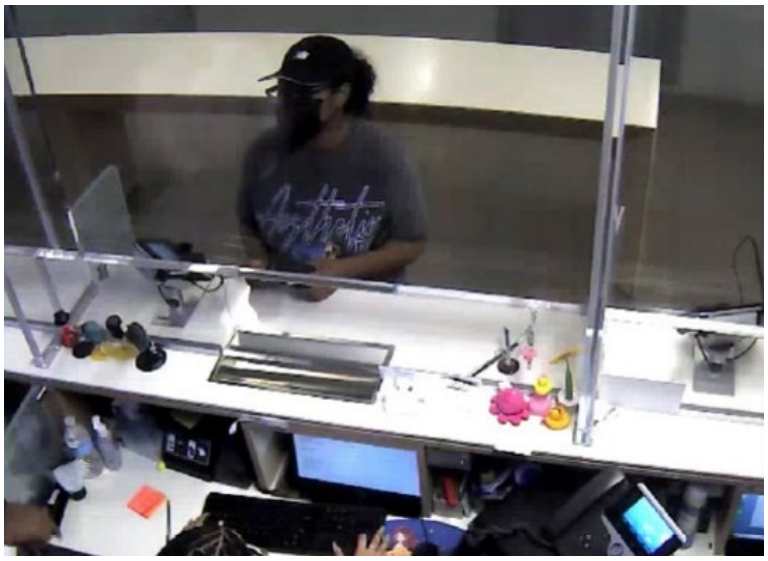
a. From in or about July 2022 through in or about September 2024, CATORA NOEL, the defendant, visited various branches of Victim Institution-1 and conducted and attempted to conduct at least approximately 29 fraudulent transactions (the "Fraudulent Transactions") totaling over $1.6 million in connection with approximately 18 different customer accounts at Victim Institution-1. In addition to withdrawing funds directly, NOEL also fraudulently transferred funds from victim accounts to other accounts operated by co-conspirators in the Fraud Scheme. The Fraudulent Transactions included, among others, the following:

i. On or about August 29, 2023, NOEL visited a branch of Victim Institution-1 in Brooklyn, New York and withdrew approximately $4,900 in cash from a bank account belonging to a customer of Victim Institution-1.

ii. On or about August 30, 2023, NOEL visited a branch of Victim Institution-1 in New York, New York and initiated a wire transfer of approximately $150,000 from a bank account belonging to a customer of Victim Institution-1. The image below depicts NOEL, whom

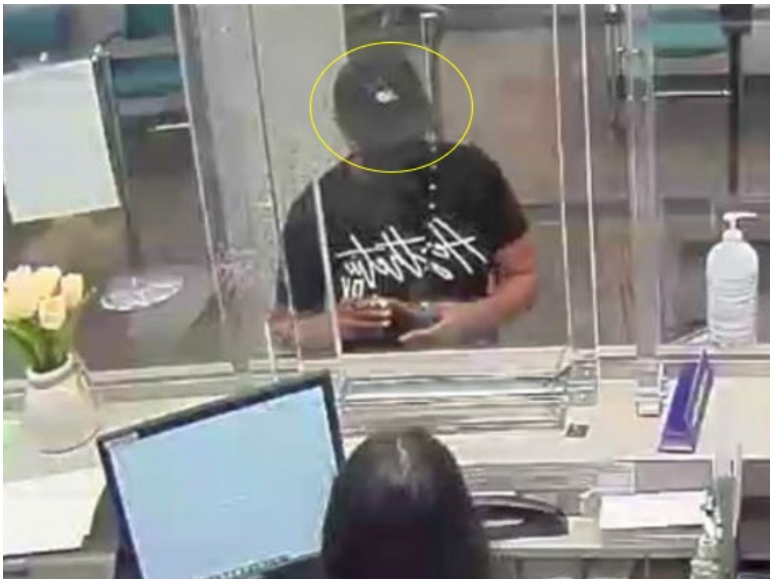
[3] "SIM swap" refers to the process through which an individual transfers a victim's phone number to a new SIM card, which allows the individual to use the victim's call number and access the victim's mobile banking accounts from their own device.

I recognize based on my involvement in this investigation and my review of the photo from NOEL's September 2024 arrest (*see infra* ¶ 14.f, on or about August 30, 2023, at Victim Institution-1's branch location:



iii. On or about September 23, 2023, NOEL visited a branch of Victim Institution-1 in Brooklyn, New York and withdrew approximately $4,900 in cash from a bank account belonging to a customer of Victim Institution-1.

iv. On or about October 5, 2023, NOEL visited a branch of Victim Institution-1 in Astoria, New York and initiated a wire transfer of approximately $150,000 from a bank account belonging to a customer of Victim Institution-1. The image below depicts NOEL at Victim Institution-1's branch on or about October 5, 2023, and wearing what appears to be the same hat (highlighted by a yellow circle) and a similar t-shirt that NOEL wore during the August 30, 2023, transaction (*supra* ¶ 13.a.ii):



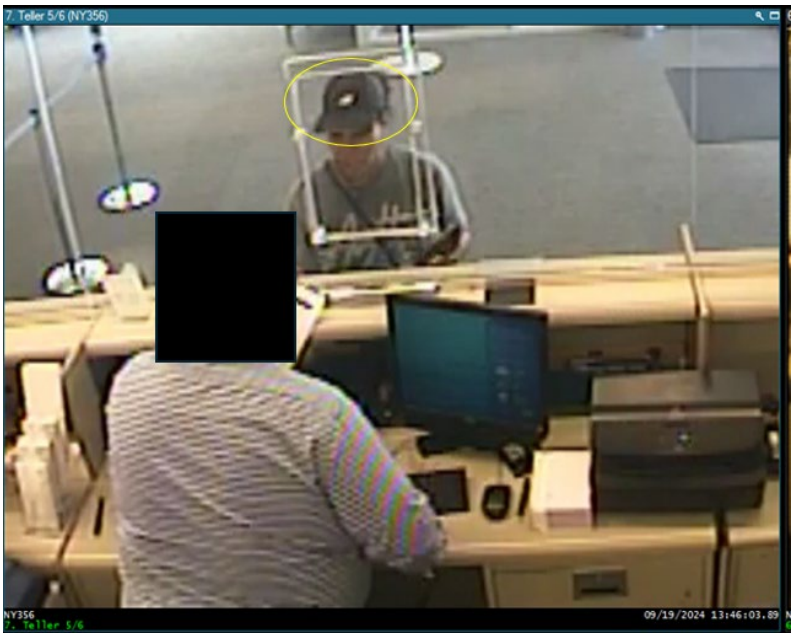
v. On or about October 6, 2023, NOEL visited a branch of Victim Institution-1 in Brooklyn, New York and initiated a wire transfer of approximately $90,000 from a bank account belonging to a customer.

vi. On or about October 10, 2023, NOEL visited a branch of Victim Institution-1 in Ridgewood, New York and initiated a wire transfer of approximately $64,000 from a bank account belonging to a customer.

vii. On or about October 12, 2023, NOEL visited a branch of Victim Institution-1 in Brooklyn, New York and initiated a wire transfer of approximately $64,000 from a bank account belonging to a customer.

viii. Between on or about November 2, 2023, and July 24, 2024, NOEL visited at least five different branches of Victim Institution-1 in New York, New York and one branch of Victim Institution-1 in Mohegan Lake, New York and initiated wire transfers totaling approximately $637,760 from bank accounts belonging to eight different customers.

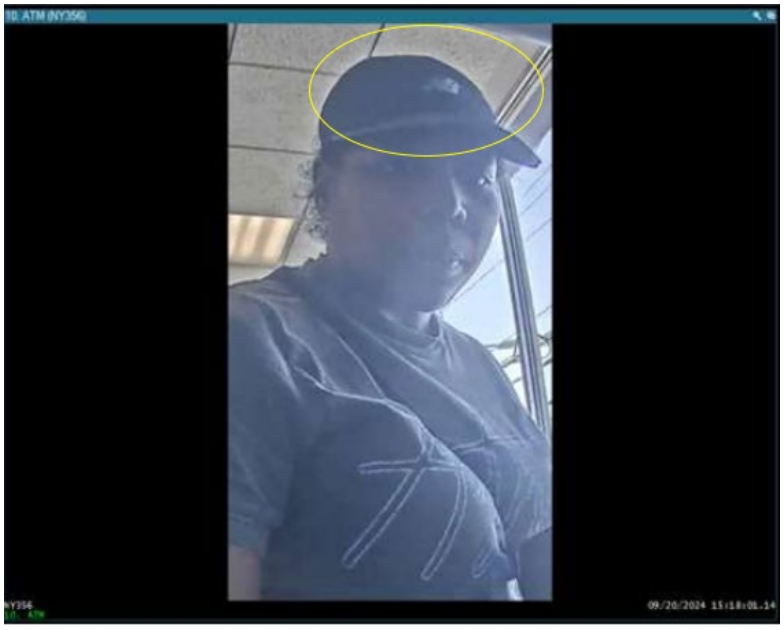
ix. On or about September 19, 2024, NOEL visited a branch of Victim Institution-1 in Westbury, New York. NOEL withdrew approximately $4,900 in cash and initiated a wire transfer of approximately $175,000 from a bank account belonging to Victim-1 to a bank account owned by an entity called "The Passport Management LLC." The image below depicts NOEL at a teller window at the Victim Institution-1 branch in Westbury, New York on or about September 19, 2024 and wearing what appears to be the same hat (highlighted by a yellow circle) and t-shirt that NOEL wore during the August 30, 2023, and October 5, 2023, Fraudulent Transactions (*supra* ¶¶ 13.a.ii, iv):



x. On or about September 20, 2024, NOEL visited a branch of Victim Institution-1 in Westbury, New York—the same branch location where STEPHENSON was employed—and initiated a wire transfer of approximately $95,000 from a bank account belonging to Victim-1 to a bank account owned by The Passport Management LLC. The image below depicts NOEL (highlighted by a yellow circle) at Victim Institution-1 branch on or about September 20,

2024 and wearing what appears to be the same t-shirt that NOEL wore during the August 30, 2023, October 5, 2023, and September 19, 2024, Fraudulent Transactions (*supra* ¶¶ 13.a.ii, iv, ix):

xi. In addition, on or about September 20, 2024, at a branch of Victim Institution-1 in Westbury, New York, NOEL attempted to withdraw cash from an ATM from a bank account belonging to Victim-1. Surveillance footage from the ATM captured NOEL's face and hand, which bears a tattoo between the thumb and index finger. The images below depict NOEL at the ATM at a Victim Institution-1 branch in Westbury, New York on or about September 20, 2024, including NOEL's hand tattoo and the same hat and t-shirt (highlighted by yellow circles) that NOEL appears to have worn during earlier transactions, *supra* ¶¶ 13.a.ii, iv, ix, and x.



CATORA NOEL's Arrest and Identification as a Participant in the Fraud Scheme

14. Based my conversations with other individuals, including other law enforcement officers, and my review of law enforcement reports and records, including records from Memphis Police Department regarding the arrest of CATORA NOEL, the defendant, in Memphis, Tennessee on or about September 25, 2024, and records from a financial institution ("Victim Institution-2" and, collectively with Victim Institution-1, the "Victim Institutions") in Memphis, Tennessee, I have learned, among other things, the following:

a. On or about September 25, 2024, NOEL visited a branch of Victim Institution-2 in Memphis, Tennessee, impersonated Victim-5, and transferred approximately $85,000 from a bank account belonging to Victim-5.

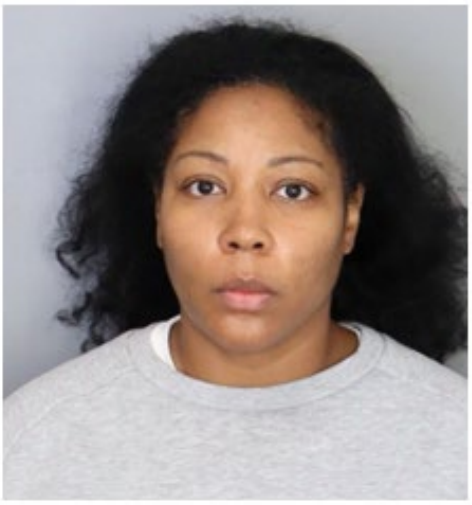
b. On the same date, on or about September 25, 2024, NOEL visited another branch of Victim Institution-2. While at the branch, NOEL provided a false Florida State driver's license (the "Driver's License"), bearing a photo of NOEL and the name of Victim-6, to an employee of Victim Institution-2. NOEL then attempted to wire approximately $55,000 from Victim-6's bank account. The image below depicts the Driver's License that NOEL provided to an employee at the Victim Institution-2 branch in Memphis, Tennessee.

c. I have reviewed the person depicted on the Driver's License and compared it with the surveillance images of the woman depicted at the various Victim Institution-1 locations above and believe they are the same person—*i.e.*, NOEL.

d. Given the large amount of the requested wire transfer, the bank employee asked NOEL for account-verifying information, including the date Victim-6's bank account was opened and the amount of the most recent withdrawal. After NOEL failed to accurately respond to the verification questions and the bank employee refused to return the Driver's License to NOEL, NOEL left the Victim Institution-2 branch.

e. As NOEL left, one of the bank employees followed NOEL outside, flagged down law enforcement officers from the Memphis Police Department, who were nearby, and reported NOEL's attempt to fraudulently wire funds from a customer's bank account. As a result, the law enforcement officers arrested NOEL and seized NOEL's cellphone incident to her arrest. In addition, during NOEL's arrest, NOEL identified herself to law enforcement as "Catora Noel."

f. The images below depict NOEL following her September 25, 2024, arrest in Memphis, Tennessee. Specifically, the photo on the left depicts NOEL's arrest photo, and the photo on the right depicts NOEL's hand, which appears to depict a similar tattoo (highlighted by a yellow circle) reflected in the ATM surveillance of the September 20, 2024, transaction, *supra* ¶ 13.a.xi.



CATORA NOEL Impersonates Victims in Calls to Victim Institution-1 to Fraudulently Obtain Bank Funds

15. Based on my conversations with other individuals, including other law enforcement officers and employees of Victim Institution-1, and my review of reports and records provided by Victim Instiution-1, including recorded calls from CATORA NOEL, the defendant, to Victim Institution-1, and my review of data extracted from NOEL's cellphone, which was seized incident to her arrest on or about September 25, 2024, I have learned, among other things, the following:

a. The cellphone seized from NOEL on or about September 25, 2024 is assigned a phone number that was used to call Victim Institution-1 between in or about March 2024 and June 2024. These calls were recorded by Victim Institution-1, and I have reviewed them in connection with this investigation. During these calls, NOEL posed as at least three different bank customers to obtain information regarding the customers' accounts in furtherance of the Fraud Scheme. For example:

i. On or about April 15, 2024, NOEL called Victim Instiution-1 to confirm the shipment status of a replacement debit card for Victim-2. During the call, NOEL falsely identified herself as Victim-2 and, upon request, provided the name of Victim-2's spouse.

ii. On or about April 19, 2024, NOEL called Victim Instiution-1 to obtain the shipment status of a replacement debit card for a bank customer Victim-3. During the call, NOEL falsely identified herself as Victim-3 and stated, for authentication purposes, that she entered the last four digits of Victim-3's social security number.

iii. On or about June 6, 2024, NOEL called Victim Instiution-1 to obtain the balance for a checking account belonging to a bank customer ("Victim-7"). In addition, NOEL requested information regarding recent transactions from the account. NOEL falsely identified herself as Victim-7 and provided the debit card number and the last four digits of Victim-7's social security number.

WHEREFORE, I respectfully request that warrants be issued for the arrests of CATORA NOEL, DARREN STEPHENSON, and IMANI-KAI BROWN, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

/s/ Melwin Geevarghese, by the Court with permission
MELWIN GEEVARGHESE
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 24th day of July, 2026.

RTarnofsky
THE HONORABLE ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK