AUSAs: Ioannis D. Drivas and Daniel B. Listwa

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA v. PARIS BAKER and MICHAEL SULLIVAN, Defendants.	26 mj 4615 **SEALED COMPLAINT** Violations of 18 U.S.C. §§ 1028A, 1029, 1343, 1349, and 1956(h) COUNTY OF OFFENSE: ROCKLAND

SOUTHERN DISTRICT OF NEW YORK, ss.:

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

COUNT ONE
(Conspiracy to Commit Wire Fraud)

1. From at least in or about 2019 through at least in or about 2024, in the Southern District of New York and elsewhere, PARIS BAKER and MICHAEL SULLIVAN, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Sections 1343.

2. It was a part and an object of the conspiracy that PARIS BAKER and MICHAEL SULLIVAN, the defendants, and others known and unknown, 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, would and did transmit and cause 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, in violation of Title 18, United States Code, Section 1343, to wit, PARIS BAKER and MICHAEL SULLIVAN agreed to engage in a scheme, and engaged in a scheme, as part of which they incorporated shell entities in the names of victims of identity theft, created accounts on behalf of those shell entities with payment processors, and initiated unauthorized debits of third parties' bank accounts, purportedly in consideration for services rendered by the shell companies.

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

COUNT TWO
(Conspiracy to Commit Money Laundering)

3. From at least in or about 2019 through at least in or about 2024, in the Southern District of New York and elsewhere, PARIS BAKER and MICHAEL SULLIVAN, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and

agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

4. It was a part and an object of the conspiracy that PARIS BAKER and MICHAEL SULLIVAN, the defendants, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction, which transaction affected interstate and foreign commerce and involved the use of a financial institution which was engaged in, and the activities of which affected, interstate and foreign commerce, and which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

COUNT THREE
(Wire Fraud)

5. From at least in or about 2019 through at least in or about 2024, in the Southern District of New York and elsewhere, PARIS BAKER and MICHAEL SULLIVAN, the defendants, 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, BAKER and SULLIVAN engaged in a scheme as part of which they incorporated shell entities in the names of victims of identity theft, created accounts on behalf of those shell entities with payment processors, and initiated unauthorized debits of third parties' bank accounts, purportedly in consideration for services rendered by the shell companies.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT FOUR
(Conspiracy to Commit Access Device Fraud)

6. From at least in or about 2019 through at least in or about 2024, in the Southern District of New York and elsewhere, PARIS BAKER and MICHAEL SULLIVAN, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(2) and (a)(5).

7. It was a part and an object of the conspiracy that PARIS BAKER and MICHAEL SULLIVAN, the defendants, and others known and unknown, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did traffic in and use one and more unauthorized access devices during a one-year period, and by such conduct

obtain items of value aggregating $1,000 and more during that period, in violation of Title 18, United States Code, Section 1029(a)(2).

8. It was further a part and an object of the conspiracy that PARIS BAKER and MICHAEL SULLIVAN, the defendants, and others known and unknown, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did effect transactions, with one and more access devices issued to another person and persons, to receive payment and any other thing of value during a one-year period the aggregate value of which was equal to and greater than $1,000, in violation of Title 18, United States Code, Section 1029(a)(5).

Overt Acts

9. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere[1]:

a. From at least in or about 2019 through in or about 2024, BAKER, SULLIVAN, and/or their co-conspirators used personally identifiable information of identity theft victims to incorporate fictitious shell companies, including (i) Sebi Property Management; (ii) Sada Property Group; (iii) Vollen Medical Center; (iv) Acclimate Property Management; (v) Majani Wellness Center; and (vi) Fruitive Medical & Rehab Center.

b. From at least in or about 2020 through in or about 2024, BAKER, SULLIVAN, and/or their co-conspirators applied on behalf of each of the shell companies, using Identity Theft Victims' personally identifiable information without authorization, for merchant payment processor accounts with Victim Payment Processors, after which, BAKER, SULLIVAN, and/or their co-conspirators initiated fraudulent transactions using certain of those merchant payment processor accounts, leading to funds being deposited in bank accounts controlled by certain of the shell entities.

c. On or about October 17, 2022, December 15, 2022, February 21, 2023, March 16, 2023, and April 25, 2023, BAKER deposited funds totaling approximately $2,850 into Sada's bank account.

d. On or about March 28, 2024, July 14, 2024, and August 2, 2024, BAKER withdrew funds from Majani's bank account, totaling approximately $2,840.

e. On or about February 16, 2022, February 17, 2022, February 18, 2022, and February 22, 2022, SULLIVAN withdrew funds totaling approximately $258,000 in the form of cashier's checks from Vollen's bank account.

f. On or about May 4, 2023, May 5, 2023, May 10, 2023, and May 11, 2023, SULLIVAN withdrew funds totaling approximately $497,000 in the form of cashier's checks from Sada's bank account.

[1] Capitalized terms have the same meaning as defined later in this affidavit.

(Title 18, United States Code, Section 1029(a)(2), (a)(5), and (b)(2).)

COUNT FIVE
(Access Device Fraud)

10. From at least in or about 2019 through at least in or about 2024, in the Southern District of New York and elsewhere, PARIS BAKER and MICHAEL SULLIVAN, the defendants, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did (i) traffic in and use one and more unauthorized access devices during a one-year period, and by such conduct obtained items of value aggregating $1,000 and more during that period, in violation of Title 18, United States Code, Section 1029(a)(2) and (ii) effect transactions, with one and more access devices issued to another person or persons, to receive payment and any other thing of value during a one-year period the aggregate value of which was equal to and greater than $1,000, in violation of Title 18, United States Code, Section 1029(a)(5); to wit, BAKER and SULLIVAN fraudulently applied for, and obtained, merchant payment processor accounts using identity theft victims' personally identifiable information that they were not authorized to use and then used those payment processor accounts to effect transactions and receive at least thousands of dollars of U.S. Currency.

(Title 18, United States Code, Sections 1029(a)(2), (a)(5), and 2.)

COUNT SIX
(Aggravated Identity Theft)

11. From at least in or about 2019 through at least in or about 2024, in the Southern District of New York and elsewhere, PARIS BAKER and MICHAEL SULLIVAN, 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, BAKER and SULLIVAN used and transferred the names and means of identification of other persons to incorporate shell entities and to apply for, and maintain, payment processor accounts during and in relation to the conspiracy to commit conspiracy to commit access device fraud charged in Count Four and the access device fraud charged in Count Five of this Complaint.

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

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

12. I am a Special Agent with the FBI, and I have been personally involved in the investigation of this matter. This affidavit is based in part on my conversations with other law enforcement agents and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all 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. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

Overview of the Conspiracy

13. Based on my personal participation in this investigation, including my interview of witnesses, my review of subpoena returns, my conversations with other law enforcement agents, my review of electronic data retrieved from online accounts controlled by PARIS BAKER and MICHAEL SULLIVAN, the defendants, and my training and experience, I have learned the following about a fraudulent Automated Clearing House (ACH) transaction scheme perpetrated by BAKER, SULLIVAN, and others known and unknown (the "ACH Fraud Scheme"):

a. Between approximately 2019 and 2024, BAKER, SULLIVAN and others conducted a fraudulent payment scheme, as part of which they incorporated shell entities in the names of victims of identity theft (the "Identity Theft Victims"). They then created accounts on behalf of the shell entities with certain payment processors (the "Victim Payment Processors") and initiated unauthorized debits of third parties' bank accounts, purportedly in consideration for services rendered by the shell companies. BAKER, SULLIVAN, and others involved in the scheme applied for payment process applications and communicated with the Victim Payment Processors principally using corporate email accounts attributed to the shell entities.

b. Some of the unauthorized transactions initiated by the shell entities were cleared by the payment processors, who transferred funds into bank accounts controlled by the shell entities. Those funds were subsequently spent by BAKER, SULLIVAN, and others involved in the scheme, or were transferred to other accounts under their control.

c. At least three Victim Payment Processors were targeted in connection with the ACH Fraud Scheme: (i) Victim Payment Processor-1, which is a multi-service payment processing business that was headquartered in Valley Cottage, Rockland County, New York at the time of the ACH Fraud Scheme; (ii) Victim Payment Processor-2, which is a payment processing provider, headquartered in Atlanta, Georgia; and (iii) Victim Payment Processor-3, which is a payment processing and financial services provider, headquartered in Monett, Missouri.

d. BAKER, SULLIVAN, and others involved in the scheme attempted to defraud victims of at least approximately $3.7 million in connection with the ACH Fraud Scheme and successfully procured at least approximately $1.3 million in fraudulent proceeds through the scheme. They employed at least six shell entities in connection with the ACH Fraud Scheme: (i) Sebi Property Management; (ii) Sada Property Group; (iii) Vollen Medical Center; (iv) Acclimate Property Management; (v) Majani Wellness Center; and (vi) Fruitive Medical & Rehab Center.

Sebi Property Management

14. Sebi Property Management Corp. ("Sebi") was incorporated in Florida on or about September 26, 2019. Sebi's filings with the Florida Department of State identified a particular individual—Identity Theft Victim-1—as the entity's CEO and registered agent. Based on my interview of Identity Theft Victim-1, I understand he was not involved in Sebi's incorporation or in its operations, and he did not give permission for his identity to be used in Sebi's incorporation. Based on my participation in this investigation, my training and experience, my review of

documents concerning Sebi, and my interviews of witnesses, I believe Sebi is a fictitious shell entity that conducts no legitimate business and has no genuine customers.

15. Based on my review of records provided by a particular business software provider ("Software Provider-1"), I understand that, on multiple occasions in or about 2020, an individual purporting to represent Sebi called Software Provider-1, to inquire about, and to manage, business website domain hosting services on Sebi's behalf. Based on my review of audio recordings of those calls, I believe the individual calling on Sebi's behalf was PARIS BAKER, the defendant, though he identified himself by a different name on those calls. I base this belief on my review of audio recordings of other calls to certain financial institutions, including Reach Financial and Discover, in which an individual—whose voice I recognize from the calls to Software Provide-1 on Sebi's behalf—identifies himself by name as PARIS BAKER.

16. On or about June 1, 2020, Sebi applied, in the name of Identity Theft Victim-1, for a payment processor account with Victim Payment Processor-2. Between in or about June 2020 and July 2020, Victim Payment Processor-2 processed approximately 268 ACH payments on Sebi's behalf totaling approximately $576,672.60. The vast majority of these payments were returned as invalid and/or unauthorized. As a result, I understand that Victim Payment Processor-2 anticipated a loss of more than approximately $100,000 in connection with payments initiated by Sebi. I further understand that Victim Payment Processor-2 refused to process additional transactions involving Sebi and deactivated Sebi's account on or about April 11, 2023.

17. Between in or about June 2020 and July 2020, representatives of Victim Payment Processor-2 corresponded with Sebi via a particular corporate email account (the "Sebi Email"), often addressing their emails to Identity Theft Victim-1. This correspondence concerned, among other things, Sebi's creation of a payment processor account and suspicious activity on Sebi's account.

18. On or about July 30, 2020, Sebi submitted a merchant application in the name of Identity Theft Victim-1 for a payment processor account with another entity, Victim Payment Processor-3. In connection with that application, Sebi submitted a bank account statement with an account summary and transaction history that I know to be false, based on my review of Sebi's true bank records. In or around September and October 2020, Victim Payment Processor-3 processed approximately 209 ACH payments on Sebi's behalf totaling approximately $415,770. The vast majority of these payments were returned as invalid and/or unauthorized. I understand that on or about October 8, 2020 Victim Payment Processor-3 refused to process additional transactions involving Sebi and terminated Sebi's account.

19. Representatives of Victim Payment Processor-3 corresponded with Sebi via the Sebi Email in or about October 2020, often addressing their emails to Identity Theft Victim-1. This correspondence concerned, among other things, (a) Sebi's filings maintained by the Florida Secretary of State; (b) Victim Payment Processor-3's decision to cease processing Sebi's transactions and to terminate Sebi's account; and (c) the status of outstanding balances purportedly owed to Sebi. Representatives of Victim Payment Processor-3 continued to correspond with Sebi via the Sebi Email between in or around December 2020 and January 2021 concerning the status of funds deposited in Sebi's account and outstanding balances purportedly owed to Sebi.

20. Based on my review of records provided by Victim Payment Processor-3, I understand that, on or about December 2, 2020 an individual who identified himself as Identity Theft Victim-1 called representatives of Victim Payment Processor-3 to inquire about outstanding balances purportedly owed to Sebi. Based on my review of an audio recording of the December 2, 2020 call, and my review of audio recordings of other calls involving PARIS BAKER, the defendant, I believe that the individual who called Victim Payment Processor-3 on or about December 2, 2020 and identified himself as Identity Theft Victim-1 was in fact BAKER.

21. Based on my review of bank records, I understand that funds received by Sebi from Victim Payment Processor-2 and Victim Payment Processor-3 were transferred to accounts controlled by PARIS BAKER, the defendant, and his associates. For example, funds were transferred in the form of payments to credit cards in BAKER's name and to an account controlled by an individual, whom I understand, based on my review of BAKER's birth certificate, to be a member of BAKER's immediate family.

Sada Property Group

22. Sada Property Group Corp. ("Sada") was incorporated in Illinois on or about August 31, 2021. Sada's filings with the Illinois Secretary of State identified a particular individual—Identity Theft Victim-2—as Sada's president and registered agent. Based on my interview of Identity Theft Victim-2, I understand that Identity Theft Victim-2 was not involved in Sada's incorporation or in its operations and only learned of Sada's existence in or about March 2024, when he received corporate credit cards in Sada's name in the mail. Identity Theft Victim-2 did not consent to the use of his identity in Sada's incorporation. Based on my participation in this investigation, my training and experience, my review of documents concerning Sada, and my interviews of witnesses, I believe Sada is a fictitious shell entity that conducts no legitimate business and has no genuine customers.

23. On several occasions in or about 2021, 2022, and 2023, an individual purporting to represent Sada called Software Provider-1 to inquire about, to purchase, and/or to manage business services on Sada's behalf, including services related to website domain hosting. Based on my review of audio recordings of those calls, and my review of audio recordings of other calls involving PARIS BAKER, the defendant, I believe the individual calling on Sada's behalf was BAKER, though he identified himself by a different name.

24. On or about November 16, 2021, Sada submitted a merchant application in the name of Identity Theft Victim-2 for a payment processor account with Victim Payment Processor-2, identifying a particular email address (the "Sada Email") as Sada's corporate email for purposes of that application. In or around December 2021, Victim Payment Processor-2 processed approximately 58 ACH payments on Sada's behalf, totaling approximately $595,639. In each transaction, Sada initiated a debit from a purported customer's bank account. Funds from those accounts were transferred first to Victim Payment Processor-2's bank account and subsequently to a particular bank account controlled by Sada with an account number ending in 7292 (the "7292 Account"). On several occasions, an individual, whose voice I recognize as PARIS BAKER, the defendant, called the bank managing the 7292 Account to inquire about the status of funds in the account.

25. The vast majority of ACH payments initiated on Sada's behalf were returned as invalid and/or unauthorized. I understand that Victim Payment Processor-2 refused to process additional transactions involving Sada and deactivated Sada's account on or about December 13, 2021.

26. Between in or about October 2021 and December 2021, representatives of Victim Payment Processor-2 corresponded with Sada via the Sada Email, often addressing their emails to Identity Theft Victim-2. This correspondence concerned, among other things, Sada's creation of a payment processor account, Sada's receipt of ACH payments, and details regarding Sada's bank account.

27. On or about November 30, 2021, Sada submitted a merchant application in the name of Identity Theft Victim-2 for a payment processor account with Victim Payment Processor-3, listing the Sada Email as Sada's corporate email address for purposes of the application. In connection with that application, Sada submitted several bank account statements with false account summaries and transaction histories. In or about December 2021, Victim Payment Processor-3 processed approximately 61 ACH payments on Sada's behalf totaling approximately $476,714.25. In each transaction, Sada initiated a debit from a purported customer's bank account. A portion of the requested funds were transferred first to Victim Payment Processor-3's bank account and subsequently to the 7292 Account. The vast majority of ACH payments initiated on Sada's behalf were returned as invalid and/or unauthorized. I understand that Victim Payment Processor-3 refused to process additional transactions involving Sada and deactivated Sada's account on or about January 4, 2022.

28. Representatives of Victim Payment Processor-3 corresponded with Sada via the Sada Email in or about December 2021, often addressing their emails to Identity Theft Victim-2. This correspondence concerned, among other things, Sada's application for a payment processor account and Victim Payment Processor-3's suspension of Sada's account due to a high volume of unauthorized debits.

29. Based on my review of bank records, I understand that a portion of the funds that the 7292 Account received from Victim Payment Processor-2 and Victim Payment Processor-3 were subsequently transferred to an account controlled by PARIS BAKER, the defendant. For example, more than approximately $2,500 was transferred in the form of payments to a credit card in BAKER's name. Other funds from the 7292 Account were withdrawn as cash or spent on luxury apparel shopping.

30. On or about November 30, 2021, Sada submitted a merchant application in the name of Identity Theft Victim-2 for a payment processor account with Victim Payment Processor-1, identifying the Sada Email as Sada's corporate email address for purposes of the application. Between in or about September 2022 and May 2023, Victim Payment Processor-1 processed approximately 91 ACH payments on Sada's behalf totaling more than $675,000. In each transaction, Sada initiated a debit of a purported customer's bank account. Funds were transferred from those accounts first to Victim Payment Processor-1's bank account and subsequently to a particular bank account with an account number ending in 9399, on which MICHAEL SULLIVAN, the defendant, was the sole signor (the "9399 Account").

Between on or about October 2022 and April 2023, an individual who I recognize from my comparison to a known photograph as PARIS BAKER, the defendant, was recorded on bank video surveillance engaging in several transactions involving the 9399 Account.



In or about May 2023, an individual who I recognize from my comparison to a known photograph as SULLIVAN was recorded on bank video surveillance engaging in several transactions involving the 9399 Account, including withdrawing funds from the account via cashier's checks.



31. Victim Payment Processor-1 flagged many of these ACH transactions with Sada as suspicious after the transactions had been cleared: several transactions were returned as "No Account," while others were labeled "Customer Advises Not Authorized" or "Stop Payment." I understand that Victim Payment Processor-1 attempted to investigate these suspicious ACH transactions, including by emailing Identity Theft Victim-2 at the Sada Email to inquire about the payments, but received only generic responses, providing no substantive explanation. At a certain point, Victim Payment Processor-1 attempted to reverse these ACH transactions but was unable to do so because the 9399 Account had been closed, and the funds could not be returned. Based on my conversations with several of the purported customers whose bank accounts were debited by Sada, I understand that Sada's initiation of payments from their accounts was unauthorized.

32. Based on my review of bank records, I understand that funds received from Victim Payment Processor-1 in the 9399 Account were siphoned out of the account into other accounts—

including a savings bank account on which MICHAEL SULLIVAN, the defendant, was the sole signor, and which was identified as an associated account with respect to a loan application made in PARIS BAKER's true name. Funds were also withdrawn from the 9399 Account and/or the savings account and subsequently transferred to other accounts controlled by BAKER, SULLIVAN, and their associates. For example, more than approximately $102,000 was transferred via cashier's checks to an account controlled by an individual from whom I understand BAKER rented a luxury apartment. More than approximately $113,000 was transferred in the form of payments to credit cards and in service of a loan in BAKER's name. More than approximately $130,000 was transferred via cashier check and ultimately deposited in accounts controlled by a member of BAKER's immediate family. And more than approximately $259,000 was withdrawn from the 9399 Account via cashier checks and ultimately transferred into accounts controlled by SULLIVAN. Funds were also withdrawn from the 9399 Account in cash.

Vollen Medical Center

33. Vollen Medical Center, Inc. ("Vollen") was incorporated in Illinois on or about August 31, 2021. Vollen's filings with the Illinois Secretary of State identified a particular individual—Identity Theft Victim-3—as Vollen's registered agent and incorporator. Based on my interview of Identity Theft Victim-3 on or about March 3, 2025, I understand that Identity Theft Victim-3 was not involved in Vollen's incorporation or in its operations, did not know of Vollen's existence or of his association with it prior to our interview, and did not authorize the use of his identity for purposes of incorporating the entity. Based on my participation in this investigation, my training and experience, my review of documents concerning Vollen, and my interviews of witnesses, I believe Vollen is a fictitious shell entity that conducts no legitimate business and has no genuine customers.

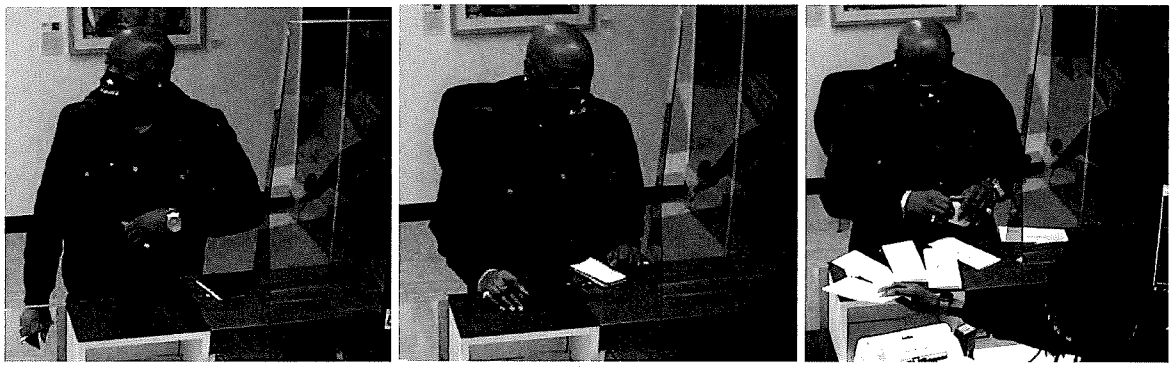
34. An individual purporting to represent Vollen called Software Provider-1 on several occasions in or about 2021 and 2022 to inquire about, to purchase, and/or to manage business services on Vollen's behalf, including services related to website domain hosting. Based on my review of audio recordings of those calls, and my review of audio recordings of other calls involving PARIS BAKER, the defendant, I believe the individual calling on Vollen's behalf was BAKER, though he identified himself by multiple names in these calls.

35. In one such call in or around May 2022, the representative of Software Provider-1 asked to speak with the account holder, who PARIS BAKER, the defendant, identified as his partner. A different male individual, who identified himself by the account holder's name, then joined the call. Based on my review of audio recordings of this call—and my review of an audio recording of a call to Citibank, in which an individual identified himself by name as "Michael Sullivan" and called to dispute charges on an account in SULLIVAN's true name—I believe the second individual heard on this call was MICHAEL SULLIVAN, the defendant.

36. Vollen submitted a merchant application in the name of Identity Theft Victim-3 for a payment processor account with Victim Payment Processor-2 on or about February 11, 2022, identifying a particular email (the "Vollen Email") as Vollen's corporate email address for purposes of the application. In or about February 2022, Victim Payment Processor-2 processed approximately 97 ACH payments on Vollen's behalf totaling approximately $719,941.44. In each transaction, Vollen initiated a debit from a purported customer's bank account. Funds from those accounts were transferred first to Victim Payment Processor-2's bank account and subsequently

to a particular bank account with an account number ending in 1689, on which MICHAEL SULLIVAN, the defendant, was the sole signor (the "1689 Account").

37. In or around January and February 2022, a particular individual, who I recognize as MICHAEL SULLIVAN, the defendant, was recorded on bank video surveillance at multiple bank locations engaging in transactions involving the 1689 Account.



38. The vast majority of ACH payments initiated on Vollen's behalf were returned as invalid and/or unauthorized, such that Victim Payment Processor-2 estimated a potential loss on the account of more than $500,000. I understand that Victim Payment Processor-2 refused to process additional transactions involving Vollen and deactivated Vollen's account on or about March 22, 2022. Based on my conversations with purported customers of Vollen whose bank accounts were debited, I understand that Vollen's initiation of payments from their accounts was in fact unauthorized.

39. Representatives of Victim Payment Processor-2 corresponded with Vollen via the Vollen Email between in or about October 2021 and March 2022, often addressing their emails to Identity Theft Victim-3. This correspondence concerned, among other things, Vollen's creation of a payment processor account and Vollen's receipt of ACH payments.

40. Based on my review of bank records, I understand that funds received from Victim Payment Processor-2 into the 1689 Account were subsequently transferred to other accounts controlled by PARIS BAKER and MICHAEL SULLIVAN, the defendants, and their associates. For example, more than approximately $35,000 was transferred via cashier's checks to a particular individual from whom I understand BAKER rented a luxury apartment. More than approximately $13,000 was transferred in the form of payments to credit cards in BAKER's name. More than approximately $59,000 was transferred to accounts controlled by SULLIVAN. And more than approximately $164,000 was transferred via cashier's checks into accounts controlled by BAKER's mother.

41. On or about February 9, 2022, Vollen submitted a merchant application in the name of Identity Theft Victim-3 for a payment processor account with Victim Payment Processor-3, identifying the Vollen Email as Vollen's corporate email address for purposes of the application. Representatives of Victim Payment Processor-3 corresponded with Vollen via the Vollen Email regarding Vollen's application for an account in or around March 2022, often addressing their emails to Identity Theft Victim-3. I understand that Victim Payment Processor-3 denied Vollen's application.

Acclimate Property Management

42. Acclimate Property Management, Inc. ("Acclimate") was incorporated in Florida on or about September 1, 2021. Acclimate's filings with the Florida Department of State identified a particular individual—Identity Theft Victim-4—as Acclimate's CEO and registered agent. Based on my interview of Identity Theft Victim-4, I understand that Identity Theft Victim-4 was not involved in Acclimate's incorporation or its operations and did not give permission for his identity to be used in the incorporation of the entity. Based on my participation in this investigation, my training and experience, my review of documents concerning Acclimate, and my interviews of witnesses, I believe Acclimate is a fictitious shell entity that conducts no legitimate business and has no genuine customers.

43. On several occasions in or about 2021, 2022, and 2023, an individual purporting to represent Acclimate called Provider-1 to inquire about, to purchase, and/or to manage business services on Acclimate's behalf, including services related to website domain hosting. Based on my review of audio recordings of those calls, and my review of audio recordings of other calls involving PARIS BAKER, the defendant, I believe the individual calling on Acclimate's behalf was BAKER, though he identified himself by a different name.

44. Acclimate submitted a merchant application in the name of Identity Theft Victim-4 for a payment processor account with Victim Payment Processor-2 on or about November 28, 2022, identifying a particular email (the "Acclimate Email") as Acclimate's corporate email address for purposes of the application. Representatives of Victim Payment Processor-2 corresponded with Acclimate via the Acclimate Email regarding Acclimate's application for an account in or around October 2021, often addressing their emails to Identity Theft Victim-4.

45. Acclimate applied for a payment processor account in the name of Identity Theft Victim-4 with Victim Payment Processor-3 on or about October 18, 2022, identifying the Acclimate Email as Acclimate's corporate email address for purposes of the application. Victim Payment Processor-3 corresponded with Acclimate via the Acclimate Email regarding Acclimate's application for an account in October and November 2022, often addressing their emails to Identity Theft Victim-4. I understand that Victim Payment Processor-3 denied Acclimate's application.

46. Based on my review of bank records, I understand that several bank accounts controlled by Acclimate, on which MICHAEL SULLIVAN was the sole signor, received payments via cashier's checks from accounts controlled by Sada and Vollen, and a substantial amount of cash was withdrawn from Acclimate's accounts thereafter.

Majani Wellness Center

47. Majani Wellness Center, Inc. ("Majani") was incorporated in Florida on or about August 4, 2022. Majani's filings with the Florida Department of State identified a particular individual—Identity Theft Victim-5—as Majani's CEO and registered agent. Based on my interview of Identity Theft Victim-5, I understand that Identity Theft Victim-5 was not involved in Majani's incorporation or in its operations and did not give his permission to incorporate Majani using his identity. Based on my participation in this investigation, my training and experience, my review of documents concerning Majani, and my interviews of witnesses, I believe Majani is a fictitious shell entity that conducts no legitimate business and has no genuine customers.

48. On several occasions in or about 2022 and 2023, an individual purporting to represent Majani called Software Provider-1, including to manage digital business services on Majani's behalf. Based on my review of audio recordings of these calls, and my review of audio recordings of other calls involving PARIS BAKER, the defendant, I believe the individual calling on Majani's behalf was BAKER, though he identified himself by another name—specifically, the first name of Identity Theft Victim-5.

49. Majani submitted a merchant application in the name of Identity Theft Victim-5 for a payment processor account with Victim Payment Processor-2 on or about January 16, 2024, identifying a particular email (the "Majani Email") as Majani's corporate email address for purposes of the application. Between in or about January 2024 and March 2024, Victim Payment Processor-2 processed approximately 52 ACH payments on Majani's behalf totaling approximately $267.361.32. The vast majority of ACH payments initiated on Majani's behalf were returned as invalid and/or unauthorized. I understand that Victim Payment Processor-2 refused to process additional transactions involving Majani and deactivated Majani's account on or about March 7, 2024.

50. In these transactions, Majani initiated a debit from a purported customer's bank account. Funds from those accounts were transferred first to Victim Payment Processor-2's bank account and subsequently to a particular bank account controlled by Majani with an account number ending in 4852, on which MICHAEL SULLIVAN, the defendant, was the sole signor (the "4852 Account").

51. Based on my review of bank records, I understand that funds were transferred from the 4852 Account to other accounts controlled by or associated with PARIS BAKER, the defendant, SULLIVAN, and their associates. For example, substantial payments were made from the 4852 Account to other accounts on which SULLIVAN is the sole signor, to a particular credit card in BAKER's name, and to entities under the control of a member of BAKER's immediate family.

52. On or about February 13, 2024, Majani submitted a merchant application in the name of Identity Theft Victim-5 for a payment processor account with Victim Payment Processor-3, identifying the Majani Email as Majani's corporate email address for purposes of application. I understand that Victim Payment Processor-3 determined that Majani's application was fraudulent, including based on Victim Payment Processor-3's assessment of public information regarding Majani and Majani's links to other fraudulent accounts implicated in the ACH Fraud Scheme. Victim Payment Processor-3 denied Majani's application on these bases.

53. Majani submitted a merchant application in the name of Identity Theft Victim-5 for a payment processor application with Victim Payment Processor-1 on or about January 29, 2024, identifying the Majani Email as Majani's corporate email address for purposes of the application. Victim Payment Processor-1 processed approximately three transactions for Majani between in or around April 2024 and July 2024. I understand that Victim Payment Processor-1 flagged Majani's application as suspicious on several grounds, including that (1) a sales representative of Victim Payment Processor-1 had a call with a Majani representative, who identified himself as Identity Theft Victim-5, in which the Majani representative asked unusual questions regarding Victim Payment Processor-1's daily ACH amount and volume limit; and (2) the Majani Email was associated with an account that had been debited by Sada in a prior transaction that had been

deemed fraudulent by Victim Payment Processor-1. At a certain point, I understand that Victim Payment Processor-1 declined to process any further transactions for Majani.

54. Victim Payment Processor-1 corresponded with Majani via the Majani Email between in or about January 2024 and July 2024 regarding Majani's application for an account and Victim Payment Processor-1's subsequent decision to place a hold on that account, often addressing their emails to Identity Theft Victim-5.

Fruitive Medical & Rehab Center

55. Fruitive Medical & Rehab Center Corp. ("Fruitive") was incorporated in Illinois on or about August 4, 2022, with a particular listed address in Downers Grove, Illinois (the "Downers Grove Address"). Fruitive was incorporated in the name of a particular individual—Identity Theft Victim-6—who I understand, based on my interview of him, had no involvement in Fruitive's incorporation or operations and did not give permission for his identity to be used in the creation of the entity. I understand that, in or about October 2024, officers of the Downers Grove Police Department visited the Downers Grove Address and determined that it was a virtual office space. No representative of Fruitive was present at that location. Based on my participation in this investigation, my training and experience, my review of documents concerning Fruitive, and my interviews of witnesses, I believe Fruitive is a fictitious shell entity that conducts no legitimate business and has no genuine customers.

56. On several occasions in or about 2022 and 2023, an individual purporting to represent Fruitive called Software Provider-1 to manage business services on Fruitive's behalf, including services related to website domain hosting. Based on my review of audio recordings of those calls, and my review of audio recordings of other calls involving PARIS BAKER, the defendant, I believe the individual calling on Fruitive's behalf was BAKER though he identified himself by another name—specifically, the first name of Identity Theft Victim-6.

57. Fruitive controls multiple bank accounts, each of which lists MICHAEL SULLIVAN, the defendant, as the sole signor.

58. On or about May 24, 2024, Fruitive applied in the name of Identity Theft Victim-6 for a payment processor account with Victim Payment Processor-1, identifying a particular email (the "Fruitive Email") as Fruitive's corporate email address for purposes of the application. Representatives of Victim Payment Processor-1 corresponded with Fruitive via the Fruitive Email between in or about May and August 2024 regarding Fruitive's application for an account, often addressing their emails to Identity Theft Victim-6.

59. In or around May 2024, Fruitive submitted an inquiry to Victim Payment Processor-3 regarding a potential application for a payment processor account. Representatives of Victim Payment Processor-3 corresponded with Fruitive via the Fruitive Email concerning that inquiry, often addressing their emails to Identity Theft Victim-6. I understand that Victim Payment Processor-3 declined to pursue Fruitive's inquiry.

60. On or about July 19, 2024, Fruitive submitted a merchant application in the name of Identity Theft Victim-6 for a payment processor account with Victim Payment Processor-2, identifying the Fruitive Email as Fruitive's corporate email address for purposes of the application.

Representatives of Victim Payment Processor-2 corresponded with Fruitive via the Fruitive Email in or around July 2024 regarding Fruitive's application, which was never completed, often addressing their emails to Identity Theft Victim-6.

Shell Entity Email Accounts

61. Based on my training and experience and my participation in this investigation, including my review of records associated with each of the shell entity email accounts employed in the ACH Fraud Scheme, I know that there are links among email accounts associated with various shell entities described above that indicate they were likely created, accessed, and controlled by the same people. For example:

a. The "recovery email," for the Vollen Email *i.e.*, the secondary email provided for the account, is the Sebi Email.

b. The Vollen Email and the Fruitive Email share the same recovery telephone number.

c. The Majani Email and the Fruitive Email share the same Term of Service ("TOS") IP.

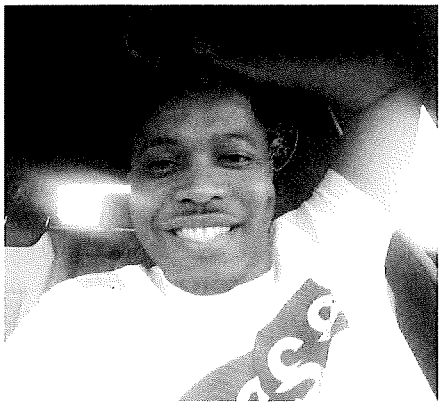
d. On several occasions in or about 2023 and 2024, a particular IP address accessed two or more of the shell entity email accounts in close temporal proximity. For example, on or about July 17, 2023, a particular IP address accessed each of the Acclimate Email, the Majani Email, the Fruitive Email, and the Sada Email. Similarly, or about January 5, 2024, a particular IP address accessed each of the Acclimate Email, the Vollen Email, the Fruitive Email, and the Sada Email.

e. The Sada Email, the Acclimate Email, the Majani Email, and the Fruitive Email are all linked to a particular International Mobile Equipment Identity (IMEI) number ending in 7322 (the "7322 IMEI"), which is associated with a specific Android device.

62. Moreover, evidence gathered in this investigation indicates that both PARIS BAKER and MICHAEL SULLIVAN, the defendants, accessed and controlled the shell entity emails employed in the ACH Fraud Scheme. For example:

PARIS BAKER

a. The Sebi Email contains a photo, dated on or about June 19, 2021, which depicts an individual who I recognize as BAKER, seated in what appears to be a Lamborghini.



b. Between in or about October 2021 and December 2021, Google search history associated with the Sebi Email includes several queries for directions on Google Maps to an address in Chicago, Illinois, where I understand BAKER resided at the time.

c. On or about October 18, 2021, the Sada Email received a sales receipt for checks shipped to an address in Chicago, Illinois, where I understand BAKER resided at the time.

d. On or about January 11, 2022, the Acclimate Email received a sales receipt for the purchase of approximately 250 checks, which were shipped to an address in Chicago, Illinois, where I understand BAKER resided at the time.

e. On or about July 19, 2024, the Fruitive Email sent an email attaching an insurance policy in the name of BAKER.

f. On or about May 29, 2025, an IP address serviced by Comcast—for which BAKER is the subscriber—logged into the Majani Email.

g. The Sada Email is associated with a particular TOS IP, which is also associated with a group of email addresses, all of which include the phrase "baker" in the account name. That group of email accounts was created on or about August 23, 2020, and each includes as its recovery email a particular email address linked to BAKER. These email accounts include, without limitation, "bakerinthotelandtower@gmail.com," "bakerintrealty@gmail.com," "bakerinvestmentequitygr@gmail.com," "bakerparking@gmail.com," "bakerstorages@gmail.com," and "tbakerorganization@gmail.com."

h. On several occasions, the same IP address that accessed BAKER's personal email account[2] accessed the Majani Email and the Acclimate Email in close temporal proximity.

i. In addition to the Sada, Acclimate, Majani, and Fruitive Emails, the 7322 IMEI associated with a particular Android device is also linked to a telephone number ending in 5805 ("the 5805 Number"), which as described below, belongs to BAKER.

[2] BAKER provided this email address as his contact information for several accounts in his true name, and the account name for the email includes the phrase "parisbaker88" (*i.e.*, an apparent reference to BAKER's name and birth year).

MICHAEL SULLIVAN

j. In or around 2023 and 2024, the Acclimate Email received a substantial number of messages addressed to SULLIVAN, including without limitation, from a virtual office provider, banks, a credit reporting agency, and a ride-sharing service.

k. In or around 2023 and 2024, the Fruitive Email received a substantial number of messages addressed to SULLIVAN, including from a business analytics provider, a bank, and a virtual workspace provider.

l. On or about February 7, 2024, the Majani Email sent a message to a virtual office provider, acknowledging that a package had arrived at Majani's virtual office and that it was forwarded to an address in Calumet City, Illinois, where I understand SULLIVAN resided at the time.

m. On or about March 16, 2024, the Majani Email sent a message attaching a photo of SULLIVAN's driver's license.

n. On or about June 3, 2024, the Majani Email received a receipt for checks shipped to an address in Calumet City, Illinois, where I understand SULLIVAN resided at the time.

o. In or around November 2024, the Majani Email received confirmation that a hotel stay in Inverness, Florida had been booked in the name of "Michael." The Majani Email subsequently received a request for "Michael" to rate his stay at that hotel "where [he] checked out on November 21, 2024."

p. In or around November 2024, the Majani Email received a message from a particular hotel in Panama City Beach, Florida, thanking "Michael Sullivan" for his stay and sending an invoice for that stay.

q. In or around November 2024, the Acclimate Email composed a message attaching a bill from a particular internet service provider in the name of "Michael Sullivan."

r. In or around December 2024, the Acclimate Email corresponded with a hotel in Las Vegas, Nevada, sending, among other things, a photo of SULLIVAN's driver's license and credit card details for a card belonging to SULLIVAN.

SULLIVAN'S iCloud

63. Finally, an iCloud Account associated with MICHAEL SULLIVAN, the defendant,[3] contains a substantial number of documents and communications pertinent to the ACH Fraud Scheme. For example:

a. SULLIVAN's iCloud contains several documents that appear to outline information regarding shell companies employed in the ACH Fraud Scheme. For example, for

[3] The iCloud Account is subscribed to in SULLIVAN's name, at an address in Calumet City, Illinois where SULLIVAN resided and is linked to a phone number used by SULLIVAN.

Sada, Acclimate, Vollen, Majani, and Fruitive, the iCloud contains a document listing an address, phone number, email address, incorporation date, and a description of the purported services offered by the shell company. Some of the documents—*e.g.*, the Acclimate summary—also provide "location landmark[s]" near the company's purported address, the number of employees supposedly working at the company, and a rationale for "what made you start the company" (in Acclimate's case, "worked as a kid with father started my own establishment").

b. SULLIVAN's iCloud contains documents listing names, addresses, and amounts for various individuals and entities that received funds transferred from shell entity accounts in connection with the ACH Fraud Scheme, including without limitation, information related to entities controlled by a member of the immediate family of PARIS BAKER, the defendant, that received funds from shell entity bank accounts via cashier's checks.

c. Between approximately 2023 and 2024, the iCloud exchanged a substantial number of text messages with the 5805 Number, which I believe to belong to BAKER. Without limitation, and as noted above, an individual who I believe to be BAKER called Software Provider-1 on many occasions regarding each of the shell entities employed in the ACH Fraud Scheme—on approximately 40 such occasions BAKER did so using the 5805 Number. Moreover, in or around 2024, the 5805 Number placed several calls to a number associated with a member of BAKER's immediate family, and, between approximately 2024 and 2026, the 5805 Number was involved in many calls with numbers associated with individuals with whom BAKER shared financial accounts. Finally, the 5805 Number is linked to the 7322 IMEI—an identifier associated with a particular Android device that is also linked to the Sada, Acclimate, Majani, and Fruitive Emails, each of which has been accessed by BAKER and SULLIVAN, as described above.

d. Over the course of 2023 and 2024, SULLIVAN and BAKER (who is listed in the iCloud account under the contact name, "Buddy") exchanged hundreds of messages, as well as numerous audio and/or video calls, which further indicate that SULLIVAN and BAKER jointly conducted the ACH Fraud Scheme. Without limitation:

i. BAKER frequently sent SULLIVAN verification codes required to access accounts;

ii. On one occasion in or about December 2021, BAKER asked SULLIVAN, in sum and substance, if "they" are helping SULLIVAN and instructed SULLIVAN to ask how much longer because SULLIVAN had other business to attend to;

iii. In or around February 2024, BAKER texted SULLIVAN the name of the Fruitive Email and asked, in substance and in part, if "they" were helping SULLIVAN, who responded, in substance and in part, that he was next in line;

iv. On another occasion in or about March 2024, BAKER instructed SULLIVAN to close the 4852 Account employed in the ACH Fraud Scheme and to open another bank account;

v. In or around June 2024, BAKER texted SULLIVAN the name of the Acclimate Email; and

vi. On or about December 18, 2024, SULLIVAN asked BAKER, in substance and in part, "What's her number"? BAKER responded with a particular number ending in 4231 and further instructed SULLIVAN, "Your Name: Mike Thomas . . . Her relationship will be your friend for 2 yr . . . Name[:] April Griffin," seemingly instructing SULLIVAN to assume a false identity and back story for purposes of a call or meeting. SULLIVAN responded, in substance and in part, "Okay give me a hour and the phone will be on."

e. Between approximately 2022 and 2024, BAKER and SULLIVAN also discussed what I believe—based on my training and experience, my involvement in this investigation, my review of SULLIVAN's iCloud, and my review of law enforcement records—to be efforts to cash fraudulent checks. For example:

i. On or about January 5, 2022, BAKER asked SULLIVAN, in substance and in part, "What's going on . . . Are they helping u or giving a[n] issue," to which SULLIVAN responded "Yes they trying to keep the check." BAKER replied "Just get id n come out" and subsequently asked "Are they going to cash yes or no?" SULLIVAN responded "No . . . I'll tell when I come out." BAKER reiterated "Get everything n come out."

ii. On or about November 14, 2024, BAKER sent SULLIVAN screenshots showing a variety of check cashing locations in or around Michigan. SULLIVAN sent BAKER photos of receipts from check cashing businesses, including a receipt from a check cashing location in or around Big Rapids, Michigan, reflecting that SULLIVAN had cashed a check in the name of National Shelf Corp. for approximately $1,490.

iii. On or about December 8, 2024, SULLIVAN sent BAKER a screenshot of an email he received from a deputy of the Washtenaw County, Michigan Sheriff's Office, which stated, in substance and in part, that the deputy was investigating potential check fraud with respect to a check cashing transaction involving SULLIVAN. After sending the screenshot, SULLIVAN stated, in substance and in part, "Call me in the morning." SULLIVAN and BAKER had an audio and/or video call the following morning.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of PARIS BAKER and MICHAEL SULLIVAN, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

Christopher Merriman
Special Agent
Federal Bureau of Investigation

Sworn to before me this 2nd day of November, 2026.

THE HONORABLE JUDITH C. McCARTHY
Chief United States Magistrate Judge
Southern District of New York