

Approved: Andrew A. Rohrbach
ANDREW A. ROHRBACH
Assistant United States Attorney

Before: THE HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

20 MAG 8410

- - - - -	X	:	
		:	<u>SEALED COMPLAINT</u>
UNITED STATES OF AMERICA		:	
		:	Violations of
- v. -		:	18 U.S.C. §§ 1349,
		:	1344, 1028A,
		:	and 2
SAIBO SIDIBEH,		:	
MOUKHAMEDE FALL,		:	
MAMADY DANFAKHA,		:	
ALHASANA HYDARA,		:	COUNTY OF OFFENSE:
MAMADOU DIALLO,		:	NEW YORK
DEMBA DIAKITE,		:	
MOHAMMED SABALY,		:	
BANGALY DOUMBIA, and		:	
ABUBACKR DANSO,		:	
		:	
Defendants.		:	
		:	
- - - - -	X	:	

SOUTHERN DISTRICT OF NEW YORK, ss.:

ROBERT MOERLER, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE
(Conspiracy to Commit Bank Fraud)

1. From at least in or about July 2018 up to and including in or about August 2019, in the Southern District of New York and elsewhere, MOUKHAMEDE FALL, MAMADY DANFAKHA, MAMADOU DIALLO, ALHASANA HYDARA, and DEMBA DIAKITE, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree 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 object of the conspiracy that MOUKHAMEDE FALL, MAMADY DANFAKHA, MAMADOU DIALLO, ALHASANA HYDARA, and DEMBA DIAKITE, the defendants, and other known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

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

COUNT TWO
(Bank Fraud)

3. From at least in or about July 2018 up to and including in or about August 2019, in the Southern District of New York and elsewhere, MOUKHAMEDE FALL, MAMADY DANFAKHA, MAMADOU DIALLO, ALHASANA HYDARA, and DEMBA DIAKITE, the defendants, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendants deposited fraudulent, forged, and/or altered checks into third-party bank accounts in an attempt to fraudulently withdraw said funds.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE
(Aggravated Identity Theft)

4. From at least in or about July 2018 up to and including in or about August 2019, in the Southern District of New York and elsewhere, MOUKHAMEDE FALL, MAMADY DANFAKHA, MAMADOU DIALLO, ALHASANA HYDARA, and DEMBA DIAKITE, the defendants, knowingly did transfer, possess, and use, 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, FALL, DANFAKHA, DIALLO, HYDARA, and DIAKITE deposited fraudulent,

forged, and/or altered checks using the banking information of third parties during and in relation to the conspiracy to commit bank fraud and bank fraud charged in Counts One and Two of this Complaint.

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

COUNT FOUR
(Bank Fraud)

5. From at least in or about October 2018 up to and including in or about December 2018, in the Southern District of New York and elsewhere, MOHAMMED SABALY, the defendant, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendant deposited fraudulent, forged, and/or altered checks into third-party bank accounts in an attempt to fraudulently withdraw said funds.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT FIVE
(Aggravated Identity Theft)

6. From at least in or about October 2018 up to and including in or about December 2018, in the Southern District of New York and elsewhere, MOHAMMED SABALY, the defendant, knowingly did transfer, possess, and use, 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, SABALY deposited fraudulent, forged, and/or altered checks using the banking information of third parties during and in relation to the bank fraud charged in Count Four of this Complaint.

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

COUNT SIX
(Bank Fraud)

7. From at least in or about October 2018 up to and including in or about April 2019, in the Southern District of New York and elsewhere, SAIBO SIDIBEH, the defendant, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendant deposited fraudulent, forged, and/or altered checks into third-party bank accounts in an attempt to fraudulently withdraw said funds.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT SEVEN
(Aggravated Identity Theft)

8. From at least in or about October 2018 up to and including in or about April 2019, in the Southern District of New York and elsewhere, SAIBO SIDIBEH, the defendant, knowingly did transfer, possess, and use, 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, SIDIBEH deposited fraudulent, forged, and/or altered checks using the banking information of third parties during and in relation to the bank fraud charged in Count Six of this Complaint.

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

COUNT EIGHT
(Bank Fraud)

9. From at least in or about September 2018 up to and including in or about August 2019, in the Southern District of New York and elsewhere, BANGALY DOUMBIA, the defendant, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the

custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, DOUMBIA deposited fraudulent, forged, and/or altered checks into third-party bank accounts in an attempt to fraudulently withdraw said funds.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT NINE

(Aggravated Identity Theft)

10. From at least in or about September 2018 up to and including at least in or about August 2019, in the Southern District of New York and elsewhere, BANGALY DOUMBIA, the defendant, knowingly did transfer, possess, and use, 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, DOUMBIA deposited fraudulent, forged, and/or altered checks using the banking information of third parties during and in relation to the bank fraud charged in Count Eight of this Complaint.

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

COUNT TEN

(Bank Fraud)

11. From at least in or about May 2019 up to and including in or about June 2019, in the Southern District of New York and elsewhere, ABUBACKR DANSO, the defendant, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, DANSO deposited a fraudulent, forged, and/or altered check into a third-party bank account in an attempt to fraudulently withdraw said funds.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT ELEVEN
(Aggravated Identity Theft)

12. From at least in or about May 2019 up to and including in or about June 2019, in the Southern District of New York and elsewhere, ABUBACKR DANSO, the defendant, knowingly did transfer, possess, and use, 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, DANSO deposited a fraudulent, forged, and/or altered check using the banking information of a third party during and in relation to the bank fraud charged in Count Ten 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 charge are, in part, as follows:

13. I am a United States Postal Inspector. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, my conversations with other law enforcement officials, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts 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

14. Based on my involvement in this investigation, I have learned that SAIBO SIDIBEH, MOUKHAMEDE FALL, MAMADY DANFAKHA, ALHASANA HYDARA, MAMADOU DIALLO, DEMBA DIAKITE, MOHAMMED SABALY, BANGALY DOUMBIA, and ABUBACKR DANSO, the defendants, engaged in a scheme to defraud banks by depositing fraudulent, forged, and/or altered checks at ATMs into the bank accounts of third parties. Before the bank realized the fraud, the defendants withdrew the funds in cash or by purchasing postal money orders.

The Bank Fraud

15. Based on my review of records from a national bank ("Bank-1") and my conversations with a Bank-1 employee, I have learned that from in or about July 2018 up to and including August 2019, the defendants individually, and with each other and/or others, did deposit or attempt to deposit fraudulent, forged, or altered checks into bank accounts not belonging to them. Specifically, I have learned in substance and in part:

a. On or about July 9, 2018, eight checks in the amount of approximately \$10,000 (collectively, "Check-1") were deposited at a Bank-1 Automated Teller Machine ("ATM") in White Plains, NY, into a bank account ("Account-1"). All eight checks were later identified by Bank-1 as altered and/or counterfeit and Bank-1 returned the checks.

b. On or about July 10, 2018, approximately \$9,500 in postal money orders were purchased using funds from Account-1.

c. On or about September 5, 2018, a check in the amount of approximately \$8,195 ("Check-2") was deposited at a Bank-1 ATM in the Bronx, New York, into the account of a third party ("Account-2") by a person later identified as BANGALY DOUMBIA, the defendant. Check-2 was later identified by Bank-1 as altered and/or counterfeit.

d. On or about September 7, 2018, a person later identified as DOUMBIA attempted to withdraw \$200 in cash from Account-2 at an ATM in New York, New York.

e. On or about October 12, 2018, a check in the amount of approximately \$14,100 ("Check-3") was deposited at a Bank-1 ATM in Mount Vernon, New York, into the account of a third party ("Account-3") by a person later identified as MOHAMMED SABALY, the defendant. Check-3 was later identified by Bank-1 as altered and/or counterfeit.

f. On or about October 23, 2018, approximately \$9,416.05 in postal money orders were purchased using funds from Account-3.

g. On or about October 29, 2018, a check in the amount of approximately \$9,700 ("Check-4") was deposited at a Bank-1 ATM in New York, New York, into the account of a third party ("Account-4"), by a person later identified as SAIBO

SIDIBEH, the defendant. Check-4 was later identified by Bank-1 as altered and/or counterfeit.

h. On or about November 1, 2018, a check in the amount of approximately \$30,567.00 ("Check-5") was deposited at a Bank-1 ATM in New Rochelle, New York, into the account of a third party ("Account-5"), by a person later identified as SIDIBEH. Check-5 was later identified by Bank-1 as a piece of paper that was jammed into the machine, causing a malfunction that permitted the machine to register a check.

i. On or about November 2, 2018, a check in the amount of approximately \$9,217.77 ("Check-6") was deposited at a Bank-1 ATM in the Bronx, New York, into the account of a third party ("Account-6"), by a person later identified as DOUMBIA. Check-6 was later determined by Bank-1 to be altered and/or counterfeit.

j. On or about November 19, 2018, two checks totaling approximately \$14,000 (collectively, "Check-7") were deposited at a Bank-1 ATM in Yonkers, New York, into the bank account of a third party ("Account-7") by a person later determined to be SABALY. One check was later determined by Bank-1 to be altered and/or counterfeit. Based on my conversations with a representative of the company on whose account the other check was drawn, I know that the company did not write a check to Account-7.

k. On or about November 29, 2018, approximately \$9,816.50 in postal money orders were purchased using funds from Account-7.

l. On or about November 21, 2018, two checks totaling approximately \$11,000 (collectively, "Check-8") were deposited at a Bank-1 ATM in Beverly Hills, Florida, into the bank account of a third party ("Account-8") by a person later determined to be SABALY. One check was later determined by Bank-1 to be altered and/or counterfeit. Based on my conversations with a representative of the company on whose account the other check was drawn, I know that the company did not write a check to Account-8.

m. On or about December 4, 2018, approximately \$8,814.85 in postal money orders were purchased using funds from Account-8.

n. On or about December 11, 2018, two checks totaling approximately \$10,000 (collectively, "Check-9") were deposited at a Bank-1 ATM in White Plains, New York, into the account of a third party ("Account-9") by a person later determined to be SABALY. Based on my conversations with a representative of the company on whose account the checks were drawn, I know that the company did not write a check to Account-9.

o. On or about December 11, 2018, a check in the amount of approximately \$36,000 ("Check-10") was deposited at a Bank-1 ATM in White Plains, New York, into the account of a third party ("Account-10") by a person later identified as SABALY. Bank-1 later identified Check-10 as counterfeit and/or altered.

p. On or about December 27, 2018, a check in the amount of approximately \$9,653.54 ("Check-11") was deposited at a Bank-1 ATM in Leonia, New Jersey, in the account of a third party ("Account-11") by a person later determined to be SIDIBEH. Based on my conversations with a representative of the company on whose account the other was drawn, I know that the company did not write a check to Account-11.

q. On or about April 15, 2019, a check in the amount of approximately \$12,332 ("Check-12") was deposited at a Bank-1 ATM in the Bronx, New York, into a bank account ("Account-12"). Check-12 was later identified by Bank-1 as altered and/or counterfeit.

r. On or about April 24, 2019, a postal money order in the amount of \$600 was purchased using funds from Account-12.

s. On or about July 1, 2019, a check in the amount of approximately \$8,036.32 ("Check-13") was deposited at a Bank-1 ATM in the Bronx, New York, into Account-12, by a person later identified as MAMADY DANFAKHA, the defendant. Check-13 was later returned by Bank-1.

t. On or about May 1, 2019, a check in the amount of approximately \$8,625.23 ("Check-14") was deposited at a Bank-1 ATM in New York, New York, into a bank account ("Account-13"). Bank-1 returned Check-14 on or about May 3, 2019.

u. On or about May 6, 2019, a check in the amount of approximately \$12,000 ("Check-15") was deposited at a Bank-1 ATM in New York, New York, into Account-13. Check-15 was later identified by Bank-1 as altered and/or counterfeit.

v. On or about May 15, 2019, approximately \$10,000 in postal money orders were purchased from Account-13.

w. On or about May 3, 2019, a check in the amount of approximately \$23,555.81 ("Check-16") was deposited at a Bank-1 ATM in New York, New York, into a bank account ("Account-14"). Check-16 was later identified by Bank-1 as a piece of paper that was jammed into the machine, causing a malfunction that permitted the machine to register a check.

x. On or about May 6, 2019, a check in the amount of approximately \$23,497.00 ("Check-17") was deposited at a Bank-1 ATM in New York, New York, into Account-14 by a person later identified as MAMADOU DIALLO, the defendant. Based on my conversations with the person on whose account Check-17 was drawn, I know that the person did not write a check to Account-14.

y. On or about May 15, 2019, approximately \$9,015.30 in postal money orders were purchased using funds from Account-14.

z. On or about May 6, 2019, a check in the amount of approximately \$216,877.49 ("Check-18") was deposited at a Bank-1 ATM in Mount Vernon, New York, into the bank account of a third party ("Account-15") by a person later identified as ABUBACKR DANSO, the defendant. Check-18 was later identified by Bank-1 as altered and/or counterfeit.

aa. On or about May 15, 2019, approximately \$29,991 in postal money orders were purchased using funds from Account-15.

bb. On or about May 20, 2019, a check in the amount of approximately \$147,333.32 ("Check-19") was deposited at a Bank-1 ATM in New York, New York, into the bank account of a third party ("Account-16") by a person later identified as DIALLO. Check-19 was later identified by Bank-1 as altered and/or counterfeit.

cc. On or about May 23, 2019, a check in the amount of approximately \$19,662.70 ("Check-20") was deposited at

a Bank-1 ATM in New York, New York, into Account-16 by a person later identified as ALHASANA HYDARA, the defendant. Based on my review of Check-20 and my training and experience, I believe that Check-20 was altered.

dd. On or about June 4, 2019, approximately \$18,030 in postal money orders were purchased using funds from Account-16. Additionally, on or about June 4, 2019, approximately \$1,100 in cash was withdrawn from Account-16 at an ATM in New Haven, Connecticut, by a person later identified as HYDARA.

ee. On or about May 23, 2019, a check in the amount of approximately \$18,400 ("Check-21") was deposited at a Bank-1 ATM in New York, New York, into the bank account of a third party ("Account-17") by a person later identified as HYDARA. Check-21 was later identified by Bank-1 as altered and/or counterfeit.

ff. On or about June 4, 2019, approximately \$7,000 in postal money orders were purchased using funds from Account-17.

gg. On or about June 3, 2019, a check in the amount of approximately \$13,567 ("Check-22") was deposited at a Bank-1 ATM in the Bronx, New York, into the bank account of a third party ("Account-18") by a person later identified as DANFAKHA. Check-22 was later identified by Bank-1 as altered and/or counterfeit.

hh. On or about June 12, 2019, approximately \$13,523 in postal money orders were purchased using funds from Account-18.

ii. On or about June 7, 2019, a check in the amount of approximately \$9,422.04 ("Check-23") was deposited at a Bank-1 ATM in the Bronx, New York, into a bank account ("Account-19"). Check-23 was later identified by Bank-1 as altered and/or counterfeit.

jj. On or about June 18, 2019, approximately \$9,316.55 in postal money orders were purchased using funds from Account-23.

kk. On or about June 14, 2019, a check in the amount of approximately \$8,600.00 ("Check-24") was deposited at a Bank-1 ATM in the Bronx, New York, into the bank account of a third party ("Account-20") by a person later identified as

DANFAKHA. Check-24 was later identified by Bank-1 as altered and/or counterfeit.

ll. On or about June 20, 2019, a check in the amount of approximately \$9,449.00 ("Check-25") was deposited into a Bank-1 ATM in the Bronx, New York, into a bank account ("Account-21"). Check-25 was later identified by Bank-1 as altered and/or counterfeit.

mm. On or about July 1, 2019, approximately \$9,416.55 in postal money orders were purchased using funds from Account-21.

nn. On or about August 6, 2019, a check in the amount of approximately \$8,750 ("Check-26") was deposited at a Bank-1 ATM in the Bronx, New York, into the account of a third party ("Account-22"), by a person later identified as DOUMBIA. Check-26 was later identified by Bank-1 as altered and/or counterfeit.

oo. On or about August 15, 2019, approximately \$2,985.79 in postal money orders were purchased using funds from Account-22. Additionally, on or about August 15, 2018, a person later identified as DOUMBIA withdrew approximately \$1,500 in funds from Account-22 at a Bank-1 ATM in the Bronx, New York.

pp. Account-9 and Account-10 were accessed by the same device cookie.

qq. Account-14, Account-17, and Account-20 were accessed by the same device cookie.

rr. The deposits of Bank-1 are insured by the Federal Deposit Insurance Corporation.

16. Based on my training and experience, I understand that a device cookie is a unique file that contains data specific to each website that is visited from a particular web browser on a particular device. The device cookie allows that particular web browser on that particular device to remember certain types of information specific to the user of the device from previous sessions. If device cookies are enabled on a browser, then they are automatically generated whenever the user visits a new webpage. Furthermore, I understand that because device cookies are unique files specific to particular devices, if the same device cookie was used to access a particular

website at different times, then that particular website was visited using the same device.

17. Based on my review of records from another national bank ("Bank-2"), I have learned the following, in substance and in part:

a. On or about July 30, 2018, a check in the amount of approximately \$5,175 ("Check-27") was deposited at a Bank-2 ATM in Fort Lee, New Jersey, into the account of a third party ("Account-23") by a person later identified as SAIBO SIDIBEH, the defendant. Bank-2 returned the check because it was altered and/or counterfeit.

b. The deposits of Bank-2 are insured by the Federal Deposit Insurance Corporation.

18. Based on my review of records from the Federal Reserve of deposited postal money orders, and based on my training and experience, I have learned the following, in substance and in part:

a. Every postal money order has a unique serial number. After a money order is cashed or deposited, the Federal Reserve obtains an image of the money order.

b. In order to cash a postal money order at a post office, the individual cashing the money order must show identification proving that the individual is the person to whom the money order is payable.

c. On or about April 24, 2019, a money order purchased from Account-12 was cashed at a post office by DEMBA DIAKITE, the defendant.

d. On or about May 24, 2019, a money order purchased from Account-14 was cashed at a post office by MAMADOU DIALLO, the defendant.

e. On or about May 31, 2019, a money order purchased from Account-13 was cashed at a post office by MAMADY DANFAKHA, the defendant.

f. On or about June 15, 2019, a money order from Account-17 was cashed at a post office by DIALLO.

19. Based on my review of records from Bank-1 and three other national banks ("Bank-3," "Bank-4," and "Bank-5"), I have learned the following, in substance and in part:

a. MOUKHAMEDE FALL, the defendant, had a bank account at Bank-3 (the "FALL Bank Account").

b. DEMBA DIAKITE, the defendant, had a bank account at Bank-4 (the "DIAKITE Bank Account").

c. ABUBACKR DANSO and BANGALY DOUMBIA, the defendants, had bank accounts at Bank-5 (the "DANSO Bank Account" and the "DOUMBIA Bank Account," respectively).

d. Postal money orders purchased from Account-16, Account-17, Account-19, and Account-21 were deposited into the FALL Bank Account.

e. Postal money orders purchased from Account-13, Account-14, Account-15, and Account-18 were deposited into the DIAKITE Bank Account.

f. Postal money orders purchased from Account-1 and Account-15 were deposited into the DANSO Bank Account.

g. A postal money order purchased from Account-22 was deposited into the DOUMBIA Bank Account.

h. Postal money orders purchased from Account-13, Account-17, and Account-19 were deposited into the account at Bank-1 of an unnamed co-conspirator ("CC-1"). The postal money orders drawn from Account-13 and Account-17 were made payable to MAMADY DANFAKHA, the defendant. The person depositing the postal money order drawn from Account-19 was later identified as DANFAKHA.

20. Based on my review of information obtained by search warrant from the Facebook account "dourblunt.lb," I have learned the following, in substance and in part:

a. Because the account username is "Lblacc Sidibeh" and the account displays images of SAIBO SIDIBEH, the defendant, I believe the account belongs to SIDIBEH.

b. On or about July 31, 2018, the day after Check-27 was deposited at Bank-2, SIDIBEH sent a message stating "I got 2 [Bank-2]."

c. On or about October 29, 2018, within days of when Check-4 and Check-5 were deposited, SIDIBEH sent a message stating "We can make \$25K with" followed by a slang term for Bank-1.

d. On or about April 2, 2019, SIDIBEH messaged another person stating, in substance and in part, "[G]et some fire OA food cook it up with Chevy routing number and wen you go drip you drop in a new box you can do it for 15k and better it's gonna clear in two days wen you drop you return the check but hold down the deposit don't let it spit back out for two mons and it's gonna read and give you tecipt then boom you lit." Based on my training and experience, I understand this statement to mean that one can forge a check to Bank of America ("OA") with a Chase ("Chevy") routing number for up to \$15,000 and convince Bank of America to clear the check in two days. In order to do so, one should tell an ATM to "return" the check but block the reader from doing so ("don't let it spit back out"), which will cause an error letting the check clear.

21. Based on my review of information obtained by search warrant from the Instagram account "moh_jefe," I have learned the following, in substance and in part:

a. Because the account displays several photos, including a profile photo, of MOUKHAMEDE FALL, the defendant, I believe the account belongs to FALL.

b. The account contains photos of debit cards in the names of other individuals, including cards issued by Bank-1. The account also contains requests to be contacted by persons with accounts at various banks, including Bank-1.

c. On or about March 27, 2019, FALL exchanged messages with the account "_topcheff_" ("Account-1") in which Account-1 stated, in substance and in part, "What's the sause bro," and FALL replied "My mans got it littt he Gon give me da sauce tho." Based on my training and experience, I have learned that "sauce" is a slang term referring to items used to commit fraud, such as altered checks or debit cards to third party bank accounts.

d. On or about July 13 and 23, 2019, FALL exchanged messages with Account-1 in which Account-1 stated, in substance and in part, that he had received at least two "mo"s.

Based on my training and experience, a "mo" refers to a money order.

e. I believe that Account-1 belongs to DEMBA DIAKITE, the defendant, because FALL's Instagram account contains a photo of DIAKITE tagged with the username of Account-1.

22. Based on my review of information obtained by search warrant from the Instagram account "tg_ballav7," I have learned the following, in substance and in part:

a. Because the account displays several photos, including a profile photo, of ALHASANA HYDARA, the defendant, I believe the account belongs to HYDARA.

b. The account contains photos of account information for multiple bank accounts, including at Bank-1. The account also contains requests to be contacted by persons with accounts at various banks, including Bank-1.

c. On or about May 20, 2019, days before Check-20 and Check-21 were deposited, HYDARA exchanged messages with the account "fulani_baller" ("Account-2"). HYDARA stated, in substance and in part, "U still need me to do tht / Depo," to which Account-2 replied, in substance and in part, "Oh yeah not today son . . . forgot pin now I gotta wait till they send son a new pin in the mail." Based on my training and experience, I believe that "depo" refers to a deposit which Account-2 told HYDARA to delay until the bank accountholder obtained a new PIN number.

d. I believe that Account-2 belongs to MAMADOU DIALLO, the defendant. Based on my review of publicly available information from Account-2, I have learned that Account-2 contains multiple photos of DIALLO, including a profile photo.

Identification of the Defendants

23. I have compared surveillance footage of the person depositing Check-2, Check-6, and Check-26, and of the person withdrawing funds from Account-2 and Account-22, with records maintained by the New York City Police Department ("NYPD") and New York Department of Motor Vehicles ("DMV") for BAGALY DOUMBIA, the defendant. Based on that comparison, I believe that the person on surveillance footage for each transaction is DOUMBIA.

24. I have compared surveillance footage of the person depositing Check-3, Check-7, Check-8, Check-9, and Check-10 with records maintained by the NYPD and DMV for MOHAMED SABALY, the defendant. Based on that comparison, I believe that the person depositing each of those checks is SABALY.

25. I have compared surveillance footage of the person depositing Check-4, Check-5, Check-11, and Check-27 with records maintained by the NYPD for SAIBO SIDIBEH, the defendant. Based on that comparison, I believe that the person depositing each of those checks is SIDIBEH.

26. I have compared surveillance footage of the person depositing Check-13, Check-22, and Check-24, and the person depositing a money order into the account of CC-1, with records maintained by the NYPD and DMV for MAMDY DANFAKHA, the defendant. Based on that comparison, I believe that the person making each of these deposits is DANFAKHA.

27. I have compared surveillance footage of the person depositing Check-17 and Check-19 with records maintained by the NYPD for MAMADOU DIALLO, the defendant, and with Account-2. Based on that comparison, I believe that the person depositing each of those checks is DIALLO.

28. I have compared surveillance footage of the person depositing Check-18 with records maintained by the DMV and criminal history records for ABUBACKR DANSO, the defendant, and surveillance footage from the DANSO Bank Account. Based on that comparison, I believe that the person depositing Check-18 is DANSO.

29. I have compared surveillance footage of the person depositing Check-20 and Check-21, and of the person withdrawing funds from Account-14, with records maintained by the NYPD and DMV for ALHASANA HYDARA, the defendant. Based on that comparison, I believe that the person surveillance footage for each transaction is HYDARA.

30. As described above in Paragraph 19, postal money orders funded from accounts that had received fraudulent or counterfeit checks were deposited into the account of MOUKHAMEDE FALL, the defendant.


postal money orders / AR, RWM, OTW

31. As described above in Paragraph 19, funded from accounts that had received fraudulent or counterfeit checks were deposited into the account of DEMBA DIAKITE, the defendant.

WHEREFORE, deponent respectfully requests that warrants be issued for the arrests of SAIBO SIDIBEH, MOUKHAMEDE FALL, MAMADY DANFAKHA, ALHASANA HYDARA, MAMADOU DIALLO, DEMBA DIAKITE, MOHAMMED SABALY, BANGALY DOUMBIA, and ABUBACKR DANSO, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

s/ Robert W. Moerler / otm
ROBERT W. MOERLER Work Rep. # 6951
Postal Inspector
United States Postal Inspection Service

Sworn to me through the transmission of this Complaint by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1, this 10th day of August, 2020


THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK