

AUSAS: MARGERY FEINZIG
JAMES MCMAHON

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UNITED STATES OF AMERICA :
- v. - :
OSHA NE MULLINGS, :
a/k/a "Ghost," :
Defendant. :

SEALED COMPLAINT 26mJ42
Violations of
18 U.S.C. § 1349, 1956(h)
COUNTY OF OFFENSE:
Dutchess

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SOUTHERN DISTRICT OF NEW YORK, ss.:

SEAN SMYTH, being duly sworn, deposes and says that he is a Special Agent with the United States Attorney's Office for the Southern District of New York ("USAO"), and charges as follows:

COUNT ONE
(Conspiracy to Commit Wire Fraud)

1. From at least in or about January 2019 through the present, in the Southern District of New York and elsewhere, OSHANE MULLINGS, a/k/a "Ghost," the defendant, 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, Section 1343.

2. It was a part and an object of the conspiracy that OSHANE MULLINGS, a/k/a "Ghost," the defendant, 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 materially false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio 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, MULLINGS and others, using interstate and international phone calls, text messages and emails, among other means, agreed to make and caused to be made false statements to victims representing that they were bank investigators and law enforcement officers and that the victims needed to transfer money out of their bank and investment accounts, including by interstate and international wire transfers, to assist them in the conduct of investigations, when, in fact, MULLINGS and his coconspirators were not bank investigators or law enforcement officers conducting investigations and, thereafter, MULLINGS and his co-conspirators misappropriated the victims' funds.

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

COUNT TWO
(Conspiracy to Commit Money Laundering)

3. From at least in or about January 2019 through the present, in the Southern District of New York and elsewhere, OSHANE MULLINGS, a/k/a “Ghost,” the defendant, 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, Sections 1956(a)(1)(B)(i), 1956(a)(2)(B)(i), 1956(a)(1)(A)(i) and 1957.

4. It was a part and an object of the conspiracy that OSHANE MULLINGS, a/k/a “Ghost,” the defendant, 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).

5. It was further a part and an object of the conspiracy that OSHANE MULLINGS, a/k/a “Ghost,” the defendant, and others known and unknown, would and did knowingly engage and attempt to engage in monetary transactions, as defined in Title 18, United States Code, Section 1957(f)(1), in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, the transfer of funds in amounts greater than \$10,000, to bank accounts in Japan, with proceeds derived from wire fraud, in violation of Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1957.

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

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

6. I have been a Special Agent with the USAO since 2015. From 2002 to 2015, I was a Special Agent with the Department of Homeland Security. During the course of my career, I have participated in hundreds of fraud investigations and in the arrests of numerous individuals charged with wire fraud, money laundering, and conspiring to commit those offenses, among other things. I have been personally involved in the investigation of this matter. I base this affidavit on my training and experience, my personal knowledge as well as my conversations with other law enforcement officers, other individuals, and my examination of various reports and records.

7. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during this 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.

Background of the Fraud

8. Based on my interviews of victims, my review of bank records, and my review of electronic communications and documents, I have learned that from at least in or about January 2019 through the present, a group of individuals has been contacting victims all over the United States and inducing them to transfer their money out of their own bank and investment accounts by making false statements and representations to the victims, including, among other things, (i) claiming they are bank investigators and/or law enforcement officers who need the victims to assist them in conducting confidential investigations; and/or (ii) claiming the victims' bank accounts have been compromised and the victims need to transfer their money out of their accounts to protect it from loss. Thereafter, victims' funds are deposited into bank accounts in other people's names, and, among other things, wire transferred to bank accounts in Japan, withdrawn in cash from ATM machines in Jamaica, and used to make purchases in Jamaica and elsewhere via debit cards. In addition, fraudulent charges are being made using victims' credit cards. I believe OSHANE MULLINGS, a/k/a "Ghost," the defendant, is a leader of the organization that the members call the Modern Boyz.

9. Based on information obtained during the investigation, there appear to be over 100 victims who have been defrauded out of over \$6 million.

10. During the investigation, we executed search warrants of two TextNow accounts used by the perpetrators to communicate with Victim-1 and other apparent victims. In addition, we also executed search warrants on Apple iCloud accounts that contain data back-up from the account users' iPhones. The Apple account for one of the iCloud back-ups is subscribed to OSHANE MULLINGS and has a verified cellphone number containing an area code in Jamaica and ending in 2150 (the "MULLINGS iCloud Account"). A search of the iCloud Accounts revealed numerous text and voice exchanges among MULLINGS, using the cellphone for the 2150 number (the "2150 iPhone"), and his coconspirators, in which they discussed defrauding Victim-1 and other victims. In addition, The MULLINGS iCloud Account contained images of: MULLINGS's passport and driver's license; documents that appear to be scripts for use in perpetrating the fraud, one of which was entitled "Fraud Script;" and lists of names and contact information that appear to be lists of potential victims to contact to defraud. The identification documents confirm other information obtained during the investigation that indicates OSHANE MULLINGS, a/k/a "Ghost," the defendant, is a Jamaican national who resides in Jamaica.

Victim-1

11. Based on information provided by an 84-year-old victim ("Victim-1") and her son, I have learned that, in or about October 2022, Victim-1 received a telephone call from an individual who identified himself as a member of the fraud department of a particular bank ("Bank-1") and told her Bank-1 was conducting an undercover investigation and needed her help in connection with a criminal case in the Eastern District of New York involving an Adrian Lawrence. She was instructed that the investigation was so confidential, even other Bank-1 employees did not know about it, and she should not tell anyone about it. Victim-1 communicated with two men, through voice calls and text messages, who identified themselves

as “Steve Baxter” and “Trevor Bingley.” As discussed below, I believe that OSHANE MULLINGS, a/k/a “Ghost,” the defendant, communicated with Victim-1 as “Trevor Bingley.”

12. Based on the investigation, I have learned that to call and text Victim-1, “Baxter” and “Bingley” used two phone numbers that were each associated with TextNow accounts. TextNow is a Voice over Internet Protocol (VoIP) service that allows users to text and call any number in the United States and Canada. It provides users with a 10-digit phone number that can be used on any smartphone, tablet, or desktop computer with an internet connection.

13. According to Victim-1, her son, and bank records, between in or about October 5, 2022 and in or about July 2023, Victim-1 provided approximately \$1.5 million to the perpetrators, mostly by drawing checks on her own accounts and depositing them into other peoples’ bank accounts at the instruction of “Steve Baxter” and “Trevor Bingley.” For example, on or about June 14, 2023, Victim-1 wrote a check from her retirement account in the amount of \$37,000 that was deposited into a third party’s bank account at a bank branch in Dutchess County, New York. Victim-1 also withdrew cash from her bank account and left it on the porch of her home to be picked up and, on one occasion, she brought cash to an individual who met her outside an Ulster County post office. There were also fraudulent charges to Victim-1’s credit cards.

14. Bank records confirm that Victim-1 wrote checks drawn on her own accounts and the checks were deposited into other people’s bank accounts. Bank and Zelle¹ records reveal that after being deposited into those bank accounts, Victim-1’s money was transferred to, among other things, bank accounts in the United States and Japan that were in the names of various people. Victim-1’s money was also withdrawn in cash from ATM machines in Jamaica and used to make purchases in Jamaica via a bank debit card.

15. For example, according to bank records, on or about October 21, 2022, Victim-1 withdrew \$89,000 from her bank account. \$39,000 was deposited to an account in the name of a third party. From there, \$24,000 was transferred to an account in Japan. In another other example, on or about November 7, 2022, Victim-1 withdrew \$50,000 from her bank account and deposited it to an account in the name of a third party. From there, \$20,000 and \$30,000 were transferred to two different individual’s bank accounts. Thereafter, \$17,000 was transferred from the first account to an account in Japan and \$24,000 was transferred from the second account to a different account in Japan. In a third example, on or about June 8, 2023, \$37,500 that Victim-1 had withdrawn from her retirement account was transferred to an account in the name of a third party and approximately \$14,000 of that was withdrawn in cash and for purchases in Jamaica.

16. According to Victim-1’s son, Victim-1 received a purported \$3,000,000 cashier’s check that, she was told, was to reimburse her for the money she provided and some extra “for

¹ According to Zelle’s website, to send money using Zelle, users enroll their email or U.S. mobile number through their mobile banking app or with the Zelle app. They enter an email address or cellphone number of the recipient, enter the amount to send, and if the recipient is already enrolled with Zelle, the money will go directly into their bank account. If the recipient is not enrolled, they will get a notification explaining how to receive the money. <https://www.zellepay.com/>

her troubles.” According to Victim-1, she thought the \$3,000,000 check was being given to her as a “reward” for her assistance and she was instructed not to deposit the check until the investigation was over.

17. Victim-1’s son also provided a letter and invoice Victim-1 received on or about May 24, 2023, from a purported judicial clerk in Fort Myers, Florida. Both documents displayed fraudulent letterhead of the United States District Court for the Southern District of New York. Among other things, the letter thanked Victim-1 for “aiding in the process of apprehending and convicting some top profiled criminal who were apart of numerous fraud schemes.” (sic). The invoice contained purported fees owed to the court. The letter was forwarded from an email account, that, based on our investigation, is tied to the perpetrators.

18. According to Victim-1’s son and Victim-1, after flagging suspicious activity in Victim-1’s bank account, a bank representative contacted her county’s Adult Protective Services (“APS”) and in or about July 2023, APS contacted Victim-1’s son. Victim-1’s son then confronted his mother, but she was reluctant to explain what was happening because she believed the Bank-1 investigation was real and she had been instructed not to tell anyone about it. Victim-1 told “Baxter” that she had talked to her son and he was concerned. She provided “Baxter” with her son’s cellphone number. Victim-1’s son received a call from the phone associated with one of the telephone numbers “Baxter” and “Bingley” used to communicate with Victim-1 but did not answer it. Victim-1’s son contacted the New York State Police.

19. According to Victim-1, during the course of the fraud, she was told to delete texts. Based on a review of text messages remaining on Victim-1’s cellphone, which were exchanged on or about the day Victim-1’s son talked to her about the suspicious activity in her bank account but before she comprehended that she had been victimized, Victim-1 and “Baxter” exchanged the following text messages:

a. On or about July 27, 2023, at 9:17 PM, Victim-1 sent the following text message to “Baxter:” “You said you would get back to me.”

b. At 11:23 PM, “Baxter” responded: “I just got off phone I confirmed deposited but cannot be done tomorrow On Saturday You can”

c. Victim-1 responded: “OK will be at bank Sat. This better be good check. I need to report to State troopers. Never heard from Trever.

d. About an hour later, at 12:48 AM, “Baxter” responded: “He will call tomorrow He’s doing his best in this case because you mess things up So he’ll call tomorrow At noon”

e. Victim-1 responded “OK sorry but adult protective services started this today by contacting my son”

f. “Baxter” responded: “It’s a big mess right now because it was a private investigation And you open it To public”

g. Victim-1 responded: "He's concerned and that wants to make sure I'm OK. I'm glad he cares. Yea"

h. "Baxter" responded "I know but we have things in control It now out of control because it's now open"

20. According to Victim-1 and a New York State Police report, on or about July 31, 2023, Victim-1 met with New York State police officers and provided information about her banking activities, credit card transactions and interactions with the perpetrators. A New York State Trooper informed her the \$3,000,000 check was not genuine and she realized there was a fraud.

21. Based on my review of text exchanges in the MULLINGS iCloud Account OSHANE MULLINGS, a/k/a "Ghost," the defendant, appears to have been posing as "Trevor Bingley" and communicating directly with Victim-1. On or about October 23, 2022, MULLINGS, using the 2150 iPhone, sent a co-conspirator a screenshot of text exchanges with Victim-1 from that day. In the text exchanges, Victim-1 complained about her account being overdrawn and it is apparent that "Trevor" was impersonating a bank employee as he told her "I will be in office early tomorrow morning to get it resolve (sic). My humblest apologies [Victim-1]." I found the same text exchange in one of the TextNow accounts the perpetrators used to communicate with Victim-1.

22. Further, on or about November 14, 2022, OSHANE MULLINGS, a/k/a "Ghost, the defendant, using the 2150 iPhone, sent a co-conspirator a screenshot of text exchanges with Victim-1 from that day. In the text exchanges, Victim-1 told "Trevor" "Spoke with Steve. Sure he told you. Not really OK this is really getting to me – tired of everything (running around and funds being removed from my accounts and credit card etc. hope it ends soon (sic)". He replied "yes it will. I will call you when I get some time." This exchange was also found in one of the TextNow accounts the perpetrators used to communicate with Victim-1.

23. In addition to the text messages exchanged with Victim-1 above, we found numerous text messages in the iCloud accounts of MULLINGS's co-conspirators in which they discussed, among themselves, picking up cash from Victim-1, instructing Victim-1 to withdraw money from her accounts and deposit it into other people's bank accounts, and their purchases of airplane tickets, iPhones, and other items using Victim-1's money. We also found screenshots of transactions in Victim-1's bank account that MULLINGS's co-conspirator sent to him.

24. As noted above, Victim-1 told the perpetrators that she was speaking with the New York State Police. Based on our review of communications in the co-conspirators' iCloud Accounts, in or about November 2023, OSHANE MULLINGS, a/k/a/ "Ghost," the defendant, and his co-conspirators learned again, through a local TV news report, that Victim-1 had had also made a complaint to federal law enforcement. But, as demonstrated below, that did not stop MULLINGS and his co-conspirators from continuing to defraud more victims.

Victim-2

25. I interviewed Victim-2 who resided in California. According to Victim-2, in or about April 2024, he was contacted on his home phone by a "Steve Baxter," who claimed to be from a particular credit card services company, informed Victim-2 his account was compromised, and transferred Victim-2 to a "Phil Lamar," who represented he was with the fraud division of Victim-2's bank ("Bank-2"). "Lamar" instructed Victim-2 to make wire transfers to a holding account at another bank to protect Victim-2's funds. Victim-2 also spoke with a "David Peck," a supposed FBI agent/forensic accountant and a "Marjorie Coughlin," his purported supervisor. "Peck" provided instructions on where Victim-2 should send his money and "Coughlin" told him they were involved in an undercover operation, and he should not contact the FBI to ask questions. According to Victim-2, between April 25, 2024 and September 3, 2024, on the instruction of the perpetrators, he transferred over \$1 million – his retirement savings -- out of his account. With each transaction, Victim-2 faxed wire transfer confirmations to a number the co-conspirators provided to him. Victim-2 provided those records to law enforcement. They reflect that nearly all of Victim-2's money was transferred from Victim-2's account at Bank-2 to accounts in Japan. During a review of MULLINGS's iCloud Account, we also found images of some of Victim-2's wire transfer records.

26. In addition to the wire transfer records, other electronic evidence connects OSHANE MULLINGS, a/k/a "Ghost," to the defrauding of Victim-2. Text messages found in the iCloud accounts we reviewed included messages among the co-conspirators in which they sent each other fraudulent email accounts to use to communicate with Victim-2; Victim-2's email address; and messages with wire transfer instructions to send to Victim-2. In one text message, on or about June 20, 2024, a co-conspirator sent MULLINGS bank information for a wire transfer to an account in Japan and MULLINGS responded, "Let me know if you call the man so I can know what's what." Based on my review of the texts and information learned during the investigation, I believe "the man" to whom he is referring is Victim-2. On or about July 2, 2024, Victim-2 wire transferred \$80,000 to an account in Japan. That transfer did not go through. In a text message on or about July 9, 2024, MULLINGS instructed another co-conspirator to "Fix up this and send to [Victim-2's first name]." On the same day, Victim-2 wire transferred \$100,000 to the same account in Japan.

Victim-3

27. I interviewed Victim-3, who lived in Delaware. According to Victim-3, on or about September 19, 2024, she received a voicemail message in which she was instructed to contact her bank because her account was compromised. Victim-3 called the number provided and spoke to a "Mr. Tavern," who told her he suspected an "inside job" and advised her to stay away from her bank branch. Victim-3 was subsequently instructed to call the FBI at a particular number and speak to Agent "Phil Lamarr."

28. Victim-3 spoke with "Lamarr," and he told her a network of people at her bank were involved in fraud and to get to the bottom of it, she should wire transfer money to a particular account owned by "Zachary Webber" and he provided wire transfer information. Victim-3 did not go through with the transaction because a bank employee was "leery" about the transaction.

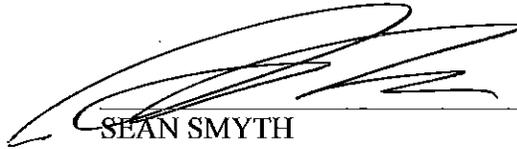
29. Later, "Tavern" called and instructed Victim-3 to purchase a cashier's check, which, he said, would provide documentation and allow them to catch the perpetrator. She agreed. He instructed her to go to a different branch of her bank, get a cashier's check for \$39,871 in the name of an individual ("Individual-1"), at a particular address in Philadelphia, and to deposit the check into Individual-1's account. He provided an account number, bank, and routing number ("Individual-1 Account"). On or about September 20, 2024, she bought the cashier's check as instructed and provided "Tavern" with the transaction numbers on the receipt of the check and the deposit slip. He promised to update her. Thereafter, Victim-3 received an email from her bank informing her that the password to her account had been changed and she realized she had been defrauded.

30. Bank records show that on or about September 20, 2024, the \$39,871 check Victim-3 had purchased was deposited into the Individual-1 Account as "Tavern" instructed. Those records also reflect that on or about October 4, 2024, there were two withdrawals from the Individual-1 Account in the amounts of \$31,500 and \$5,800. The \$31,500 was used to purchase another cashier's check. That check was in the amount of \$31,500, was payable to OSHANE MULLINGS, and was deposited into a bank account in his name.

31. Meanwhile, our review of the MULLINGS iCloud Account revealed that it contained the following images relating to Victim-3 and Victim-3's \$39,871 cashier's check: (1) a screenshot displaying a call to Victim-3, with Victim-3's name and phone number; (2) a screenshot showing the account number for the Individual-1 Account and the bank routing number for the bank where that account was located; (3) a screenshot with bank account information reflecting the deposit of the \$39,871 cashier's check; (4) a second screenshot showing the deposit of the \$39,871 cashier's check with the transaction circled in yellow; (5) a photograph of the \$31,500 cashier's check made payable to OSHANE MULLINGS; (6) a photograph of a deposit slip for the deposit of the \$31,500 check; and (7) a notice of hold slip relating to that check.

32. The investigation has disclosed the fraud appears to be ongoing. For example, we interviewed a victim who conducted a transaction involving the deposit of money into a bank account linked to OSHANE MULLINGS, a/k/a "Ghost," the defendant, and his co-conspirators in or about September 2025.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of OSHANE MULLINGS, a/k/a "Ghost," the defendant, and that he be arrested and imprisoned or bailed, as the case may be.



SEAN SMYTH
Special Agent
United States Attorney's Office for the
Southern District of New York

Sworn to before me this
9th day of January 2026



THE HONORABLE ANDREW E. KRAUSE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK