

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MOHAMMED MADIEU DUMBUYA,
a.k.a TRAVIS ANDRE HAYNES

Defendant.

Case No. 1:25-MJ-651

Under Seal

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

1. I, Brian J. Kee, a special agent with the U.S. Department of State, Diplomatic Security Service (DSS) being duly sworn, hereby depose and state as follows:

INTRODUCTION

2. I submit this affidavit in support of a criminal complaint charging Mohammed Madieu DUMBUYA, also known as Travis Andre Haynes, (hereinafter DUMBUYA) with misuse of a passport intended for another in violation of 18 U.S.C. § 1544. Based on the facts set forth herein, your affiant submits that there is probable cause to believe that DUMBUYA fraudulently applied for, obtained, used, and attempted to use a United States passport under an identity belonging to another person, a person who is now deceased.

3. The information in this affidavit comes from my personal observations and my training and experience, as well as from information obtained from other law enforcement officers, witnesses, and cooperating sources. Because I submit this affidavit for the limited purpose of establishing probable cause for the requested warrant, this affidavit does not set forth all of my knowledge about the investigation to which it relates. Rather, I have set forth only the

information that I believe is necessary to establish probable cause. I have not, however, omitted information known to me that would defeat a finding of probable cause.

AFFIANT BACKGROUND

4. I am a “federal law enforcement officer” within the meaning of Federal Rules of Criminal Procedure, that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Secretary of State and Attorney General to request an arrest warrant. I am a duly sworn member of DSS and have been so employed since April 2024. In December 2024, I became a Special Agent with the powers and authorities outline in 18 U.S.C. § 2709 and have been assigned to the Washington Field Office in Dunn Loring, Virginia. While employed by the DSS, I have actively participated in investigations of criminal activity, including but not limited to investigations of passport fraud, visa fraud, and aggravated identity theft. During these investigations, I have participated in the execution of search warrants and the seizure of evidence, including evidence related to these activities. These investigations have resulted in the arrest and conviction of individuals responsible for committing these crimes.

5. I completed new agent training at the Foreign Affairs Security Training Center in Blackstone, Virginia, and have successfully completed in-service training courses on passport fraud, visa fraud, and other topics sponsored by DSS, the Department of State, and the U.S. Department of Justice.

6. Prior to joining DSS, I was a special agent with the Federal Bureau of Investigation (FBI) from January 2020 until December of 2022. While with the FBI, I actively participated in investigations of criminal activity, including, but not limited to, investigations of firearms offenses, violent crimes, gang-related violations, and drug trafficking. During these investigations, I participated in the execution of search warrants and the seizure of evidence, including evidence related to firearms offenses, violent crimes, and gang and drug trafficking

activities, and have applied for and served as the affiant for federal search warrants, and arrest warrants. These investigations have resulted in the arrest and conviction of numerous individuals responsible for trafficking narcotics and committing violent crimes.

SUMMARY OF PROBABLE CAUSE

7. In August 2023, the Diplomatic Security Service's Washington Field Office began investigating the suspected use of a United States passport bearing the assumed name Travis Andre Haynes ("Haynes") by Mohammed Madiou DUMBUYA, a national of Sierra Leone. This investigation found that the real Haynes died in 2019, and that DUMBUYA is an imposter who has been using the Haynes identity since at least 2013, when he first used it to obtain a U.S. passport. DUMBUYA subsequently traveled using the passport multiple times and attempted to renew the passport in 2023.

BACKGROUND ON MOHAMMED M. DUMBUYA

8. According to Department of Homeland Security (DHS) records, DUMBUYA entered and exited the United States on multiple occasions under both his true name and the assumed name of Travis Haynes.

9. According to DHS records, DUMBUYA claims he first entered the United States at John F. Kennedy airport in New York in approximately December of 1985 on a B1/B2 tourist visa. In multiple submissions to USCIS in his own name over the decades, DUMBUYA has confirmed his date of birth (DOB), in August of 1962, and his identity as a native and citizen of Sierra Leone.

10. U.S. Department of State records show that, in 2013, DUMBUYA first applied for a U.S. passport using the name Travis Andre Haynes. As part of the application process, he provided a birth certificate and New York driver's license in the Haynes name as proof of identity but used a photograph that investigators have now identified as DUMBUYA's. Based on this

application, the U.S. Department of State issued a U.S. passport with DUMBAYA's photograph but in Haynes' name. In 2023, when reviewing a request to renew the passport in the Haynes identity, the National Passport Center fraud prevention managers discovered that the Social Security Number (SSN) on the mailed renewal form DS-82 matched someone who was marked in Social Security Administration records as deceased. Specifically, the person with this SSN died on April 28, 2019 in New York and was issued a death certificate. In April 2025, Travis A. Haynes's wife spoke with investigators and confirmed her husband passed away in April 2019. Investigators received a report from the New York Police Department (NYPD) capturing the circumstances of Haynes' death in New York City on April 28, 2019. Investigators reviewed photographs of Haynes, and they did not match the photographs DUMBUYA submitted with the passport application using the Haynes identity. According to Haynes' death certificate, Haynes' was buried in Butler, New Jersey on May 10, 2019.

11. Fraud prevention managers also located a Maryland driver's license issued to Travis Andre Haynes in June 2010. Your affiant reviewed the license photo and compared it to the passport renewal. The photos also do not appear to be the same person.

12. According to Customs and Border Protection records, DUMBUYA, under the assumed identity of Travis A. Haynes, used a United States passport in his name to depart from Washington Dulles International Airport (IAD) located in Dulles, Virginia on October 13, 2018 and to return to IAD on November 20, 2018. DUMBUYA made a second international trip departing from IAD on February 26, 2019 and returning to IAD on April 3, 2019. IAD is within the Eastern District of Virginia.

13. As noted previously, on or about June 27, 2023, DUMBUYA executed a form DS-82 for a passport renewal by mail, pretending to be Haynes. While the form DS-82 was submitted under the Haynes name, the addresses in the passport renewal application were associated with

DUMBUYA. The permanent address listed in the application matched DUMBUYA's DMV records, and the mailing address included, matched DUMBUYA's place of employment. As part of the application, DUMBUYA also provided the previously issued United States passport in the name of Travis Andre Haynes. Included in this affidavit is the passport photo submitted with the 2023 DS-82, which is a photograph of DUMBAYYA.

14. Your affiant reviewed the 2013 passport that was submitted in 2023 with the DS-82. This passport shows that DUMBUYA, as Haynes, obtained a tourist visa from the government of Sierra Leone in October 2018, that was valid through January 2019, and entered the country of Sierra Leone in November 2018. It also had a visa, entrance stamp, and exit stamp for travel to Sierra Leone. The passport also contained entrance and exit stamps from Heathrow International Airport in London, United Kingdom, and Charles De Galle International Airport in Paris, France.



Passport Photo attached to DS-82 for Travis A. Haynes submitted by DUMBUYA

15. In April 2025, investigators submitted additional inquiries to the Maryland Motor Vehicle Administration (MVA) using DUMBUYA's name, DOB, and SSN. MVA records show DUMBUYA holds a current Maryland license valid through August 2025. Included in this affidavit is the current MVA photo on file for DUMBUYA, with his real name listed on the license.



MVA Photo for Mohammed Madieu DUMBUYA

16. In April 2025, investigators located a Form I-213, "Record of Deportable/Inadmissible Alien," dated November 6, 2022. This document states that DUMBUYA was apprehended at the U.S. Port of Entry located at Peace Bridge near Buffalo, NY on November 6, 2022. DUMBUYA was a failed refugee applicant in Canada and escorted to the port of entry by the Canadian Border Security Agency. DUMBUYA was provided with an I-862, "Notice to Appear," with an immigration court date of January 5, 2023, and was released on his own

recognizance. Ultimately, the I-862 Notice to Appear was not filed with the Immigration Court, so on January 5, 2023, the Immigration Court deemed the case a failure to prosecute. Included in this affidavit is a photo from the November 2022 CBP encounter.

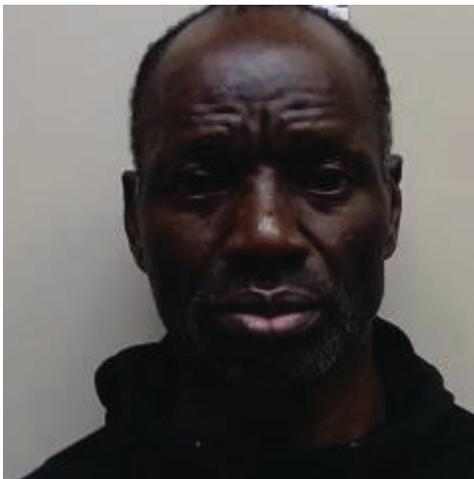


Photo of DUMBUYA from November 2022 Border Encounter

17. In April 2025, investigators identified a police report related to the arrest of DUMBUYA from July 2024 by the Upper Darby Township Police Department in Pennsylvania. According to the report, DUMBUYA was arrested while driving a vehicle reported stolen out of Prince George's County in Maryland. DUMBUYA was accompanied by two other foreign national males who were also identified in the report. Credit cards and a Maryland driver's license, in DUMBUYA's name, were located inside the vehicle and used to identify DUMBUYA as the driver. Attached to this affidavit is a DUMBUYA's arrest photo.



Upper Darby Twp Police Department

EVENT#: 735343892
SID#:
NAME: MOHAMMAD
DUMBUYA
ARREST DATE: Jul 18 2024 11:11PM
AGE AT ARREST: 61
HEIGHT: 602
WEIGHT: 185
HAIR COLOR: BLACK
EYE COLOR: BROWN



**LOCAL
ARRESTEE DATABASE**



Photo of 2024 arrest of DUMBUYA by Upper Darby Township, PA Police

18. Comparing these known photos from MVA records and the Pennsylvania arrest to the photos on the 2013 and 2023 U.S. passport applications in the name of Travis Haynes, your affiant believes the person captured in each of the respective photos is the same, and that person is Mohammed M. DUMBUYA.

CONCLUSION

19. Your affiant submits, based on the foregoing, that there is probable cause to believe on or about November 2018 and on or about April 2019, within the Eastern District of Virginia at the Washington Dulles International Airport, Mohammed M. DUMBUYA, willfully and knowingly misused a United States passport that was fraudulently obtained and intended for another in violation of 18 U.S.C. § 1544.

Respectfully submitted,



Brian J. Kee, Special Agent
Diplomatic Security Service
United States Department of State

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 10th day of November, 2025.



Digitally signed by Ivan Davis

Date: 2025.11.10 14:51:15

-05'00'

The Honorable Ivan D. Davis
United States Magistrate Judge Alexandria,
Virginia