

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THE PEOPLE OF THE STATE OF NEW YORK,

-against-

INDICTMENT NO.
74317-2022

1. SALIMOU DABO
2. TAMEK SKINNER
3. JAYVON MOORE
4. TONY BLATHERS

Defendants.

-----X

COUNT 1

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER, JAYVON MOORE and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Conspiracy in the Fourth Degree, in violation of New York State Penal Law § 105.10(1)**, committed as follows:

The defendants, from on or about and between **July 27, 2018, and March 2, 2020, in New York County, Kings County, Westchester County, Oneida County, Ulster County, and Bronx County, New York and elsewhere inside and outside the State of New York**, intending that conduct constituting a class C felony be performed, to wit: **Criminal Possession of Stolen Property in the Second Degree, in violation of New York State Penal Law § 165.52**, agreed with one or more persons to engage in or cause the performance of such conduct.

COUNT 2

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER, JAYVON MOORE and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Conspiracy in the Fifth Degree, in violation of New York State Penal Law § 105.05(1)**, committed as follows:

The defendants, from on or about and between **July 27, 2018, and March 2, 2020, in New York County, Kings County, Westchester County, Oneida County, Ulster County, and Bronx County, New York and elsewhere inside and outside the State of New York**, intending that conduct constituting a felony be performed, to wit: **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(5)**, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of the conspiracies to steal, possess, and export high-end stolen vehicles, in New York County, Kings County, Westchester County, Ulster County, Oneida County, Bronx County, New York and other jurisdictions inside and outside the State of New York. These vehicles were stolen from rental car businesses and from private individuals for the purpose of shipping the stolen vehicles to Africa for resale.

It was the role of **SALIMOU DABO** to oversee and manage this vehicle-theft and export operation. **SALIMOU DABO** provided fraudulent identification

documents and stolen credit card numbers to his co-conspirators and then directed them to steal specific vehicles from rental businesses. Additionally, **SALIMOU DABO** coordinated the transport of the stolen vehicles from the theft locations to the shipping yards, which were located in the State of Florida. In preparation for export, **SALIMOU DABO** handled all of the container and shipping reservations for the stolen vehicles that were Africa-bound.

It was the role of **TAMEK SKINNER**, to steal high-end vehicles from rental businesses using fraudulent identification documents and stolen credit card numbers and to transport the stolen vehicles to shipping yards in preparation for the vehicles' export.

It was the role of **JAYVON MOORE**, to steal high-end vehicles, to transport stolen vehicles to the State of Florida to prepare for their export and to assist **SALIMOU DABO** with loading the stolen vehicles into the shipping containers.

It was the role of **TONY BLATHERS**, to supply the stolen credit card numbers and create and supply fraudulent credit cards and fraudulent identification documents to **SALIMOU DABO**, **TAMEK SKINNER** and other members of the conspiracies, in furtherance of this auto-theft and export operation.

It was also part of these conspiracies for members of the conspiracies to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

OVERT ACTS:

In the furtherance of said Conspiracy in the Fourth Degree (Count 1) and Conspiracy in the Fifth Degree (Count 2), and to effect the objects thereof, from on or about and between July 27, 2018, and March 2, 2020, the following overt acts, among others, were committed:

1. On December 12, 2018, **SALIMOU DABO** insured a 2017 Land Rover Discovery, with a fraudulent vehicle identification number (“VIN”) SALCP2BG588676772, under Geico Policy Number 4572-29-49-00.

2. On August 25, 2019, **SALIMOU DABO** engaged in a phone conversation with an unidentified male, whereby he stated, in sum and substance, “I need, I need a place to park my car, man.... A couple of days. One week. No, not too long, you know.... I have one 4Runner and one, one Range. Is that good? Yeah, but I need good space that’s safe, you know what I’m saying?”

3. On September 13, 2019, **SALIMOU DABO** drove a stolen 2019 black Range Rover SVR, baring fraudulent North Carolina license plate HCT-8239 and forged VIN SALWZ2EF8GA547605 on 1230 Broadway, New York, New York.

4. On November 17, 2019, **TAMEK SKINNER**, utilizing a fraudulent identification and a stolen credit card number, rented-to-steal a 2019 blue Infinity QX80 baring VIN JN8AZ2NE4K9233666 from the rental business The Hertz Corporation (“Hertz”), located at Westchester County Airport, 240 Airport Road, White Plains, New York.

5. On December 18, 2019, **TAMEK SKINNER** engaged in a phone conversation with **SALIMOU DABO**, whereby he stated, in sum and substance, “Remember, I told you what happened last time...Remember the bank shit didn’t even match. I didn’t even know no better. I remember him telling me.... I said I feel like I can go back in there. Yeah. I feel like I could go back in there, maybe not that same time. I went there in the morning, so I’ll probably go there in the afternoon. That shit was so easy man. One, two, three. They had a Pathfinder...”

6. On October 29, 2019, **TONY BLATHERS** engaged in a phone conversation with **SALIMOU DABO** whereby he stated, in sum and substance, “Okay, so the swipes you want me to use the UV light?” to which **DABO** replied, in sum and substance, “No, the last five that I’m sending you, you don’t got to do the UV light with those”. **TONY BLATHERS** replied, in sum and substance, “Okay, so the seven you sent me for you, you want me to do the UV light for those?” to which **SALIMOU DABO** stated, in sum and substance, “Yeah”.

7. On October 28, 2019, **TONY BLATHERS** engaged in a phone conversation with **SALIMOU DABO**. **SALIMOU DABO** stated, in sum and substance, “So, I’m using these blanks, like, you know, in the, like, somewhere where ... you know, they check the thing, like, the light and shit. You know what I’m saying? So, if I give you the, the blanks, if I give you the blanks, you can do that for me, right?” to which **TONY BLATHERS** replied, in sum and substance, “Yeah, my joints check the light too. So what’s the problem?” **SALIMOU DABO** replied, in sum and

substance, “It, it, it beats the light?” to which **TONY BLATHERS** stated, in sum and substance, “Yeah, of course.”

8. On or about November 22, 2019 to on or about November 23, 2019, **JAYVON MOORE**, transported a stolen Hertz vehicle – a 2018 blue Toyota 4Runner, containing VIN JTEBU5JR6J5572861 – from Kingston, New York to Miami, Florida, in preparation for export to Africa.

9. On December 23, 2019, **JAYVON MOORE**, engaged in a phone conversation with **SALIMOU DABO**, whereby he stated, in sum and substance, “Hell, I aint gonna lie it was easy. 1,2,3 – 1,2,3. Like I sat in front of that shit watch that nigga go in and out. Hell, yeah.... I’m about to park this shit and go in the crib though.”

COUNT 3

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER, JAYVON MOORE and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, committed the crime of **Scheme to Defraud in the First Degree, in violation of New York State Penal Law § 190.65(1)(b)**, as follows:

The defendants, from on or about and between **July 27, 2018, and March 2, 2020, in New York County, Kings County, New York and elsewhere inside and outside the State of New York**, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain

property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property with value in excess of one thousand dollars from one or more such persons, to wit: Hertz and CMC Investments, Inc., doing business as Dollar Rent A Car (“Dollar”).

COUNT 4

The Grand Jury of New York County, by this Indictment, accuses the defendant, **SALIMOU DABO**, of the crime of **Criminal Possession of Stolen Property in the Second Degree, in violation of New York State Penal Law § 165.52**, committed as follows:

The defendant, from on or about and between **July 27, 2018, and February 4, 2020, in New York County, Bronx County, New York and Suffolk County, Massachusetts**, knowingly possessed stolen property, with intent to benefit himself or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded fifty thousand dollars, to wit: a 2017 Land Rover Discovery, VIN SALCP2BG6HH657552.

COUNT 5

The Grand Jury of New York County, by this Indictment, accuses the defendant, **SALIMOU DABO**, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(5)**, committed as follows:

The defendant, from on or about and between **July 27, 2018, and February 4, 2020, in New York County, Bronx County, New York and Suffolk County,**

Massachusetts, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, other than a motorcycle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2017 Land Rover Discovery, VIN SALCP2BG6HH657552.

COUNT 6

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Second Degree, in violation of New York State Penal Law § 165.52**, committed as follows:

The defendants, from on or about and between **July 21, 2019, and December 27, 2019, in New York County, Bronx County, New York, and Essex County, New Jersey**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded fifty thousand dollars, to wit: a 2017 Range Rover SVR, VIN SALWZ2FE5HA145192.

COUNT 7

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of

Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(5), committed as follows:

The defendants, from on or about and between **July 21, 2019, and December 27, 2019, in New York County, Bronx County, New York, and Essex County, New Jersey**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, other than a motorcycle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2017 Range Rover SVR, VIN SALWZ2FE5HA145192.

COUNT 8

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and JAYVON MOORE**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Third Degree, in violation of New York State Penal Law § 165.50**, committed as follows:

The defendants, from on or about and between **July 27, 2019, and January 29, 2020, in New York County, New York, Kings County, Washington and Broward County, Florida**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded three thousand dollars, to wit: a 2019 Toyota 4Runner, VIN JTEBU5JR4K5681126.

COUNT 9

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and JAYVON MOORE** acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(5)**, committed as follows:

The defendants, from on or about and between **July 27, 2019, and January 29, 2020, in New York County, New York, Kings County, Washington and Broward County, Florida**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, other than a motorcycle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2019 Toyota 4Runner, VIN JTEBU5JR4K5681126.

COUNT 10

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Second Degree, in violation of New York State Penal Law § 165.52**, committed as follows:

The defendants, from on or about and between **August 24, 2019, and October 11, 2019, in New York County, Westchester County, New York and Duval County, Florida**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded fifty thousand dollars, to wit: a 2019 Range Rover, VIN SALWV2SV3KA421202.

COUNT 11

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(5)**, committed as follows:

The defendants, from on or about and between **August 24, 2019, and October 11, 2019, in New York County, Westchester County, New York and Duval County, Florida**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, other than a motorcycle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2019 Range Rover, VIN SALWV2SV3KA421202.

COUNT 12

The Grand Jury of New York County, by this Indictment, accuses the defendant, **SALIMOU DABO**, of the crime of **Criminal Possession of Stolen Property in the Second Degree, in violation of New York State Penal Law § 165.52**, committed as follows:

The defendant, from on or about and between **September 18, 2019, and October 20, 2019, in New York County and Kings County, New York** knowingly possessed stolen property, with intent to benefit himself or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded fifty thousand dollars, to wit: a 2017 Mercedes Benz GLE, VIN 4JGED6EB1HA074424.

COUNT 13

The Grand Jury of New York County, by this Indictment, accuses the defendant, **SALIMOU DABO**, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(5)**, committed as follows:

The defendant, from on or about and between **September 18, 2019, and October 20, 2019, in New York County and Kings County, New York** knowingly possessed stolen property, with intent to benefit himself or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, other than a motorcycle, as defined in section one hundred twenty-five

of the vehicle and traffic law, to wit: a 2017 Mercedes Benz GLE, VIN 4JGED6EB1HA074424.

COUNT 14

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and JAYVON MOORE**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Second Degree, in violation of New York State Penal Law § 165.52**, committed as follows:

The defendants, from on or about and between **October 22, 2019, and December 26, 2019, in New York County, Westchester County, Bronx County, New York and Miami-Dade County, Florida**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded fifty thousand dollars, to wit: a 2019 Infinity QX80, VIN JN8AZ2NE4K9233666 and a 2018 Toyota 4Runner, VIN JTEBU5JR6J5572861.

COUNT 15

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and JAYVON MOORE**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(5)**, committed as follows:

The defendants, from on or about and between **October 22, 2019, and December 26, 2019, in New York County, Westchester County, Bronx County, New York and Miami-Dade County, Florida,** knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, other than a motorcycle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2018 Toyota 4Runner, VIN JTEBU5JR6J5572861.

COUNT 16

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and JAYVON MOORE,** acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree,** in violation of **New York State Penal Law § 165.45(5),** committed as follows:

The defendants, from on or about and between **October 22, 2019, and December 26, 2019, in New York County, Westchester County, Bronx County, New York and Miami-Dade County, Florida,** knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, other than a motorcycle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2019 Infinity QX80, VIN JN8AZ2NE4K9233666.

COUNT 17

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand Larceny in the Second Degree, in violation of New York State Penal Law § 155.40(1)**, committed as follows:

The defendants, on or about **November 17, 2019, in New York County and Westchester County, New York**, stole property, and when the value of the property exceeded fifty thousand dollars, to wit: a 2019 Infinity QX80, VIN JN8AZ2NE4K9233666, owned by Hertz.

COUNT 18

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand Larceny in the Fourth Degree, in violation of New York State Penal Law § 155.30(8)**, committed as follows:

The defendants, on or about **November 17, 2019, in New York County and Westchester County, New York**, stole property, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2019 Infinity QX80, VIN JN8AZ2NE4K9233666, owned by Hertz.

COUNT 19

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand Larceny in the Third Degree, in violation of New York State Penal Law § 155.35**, committed as follows:

The defendants, on or about **November 18, 2019, in New York County and Ulster County, New York**, stole property, and when the value of the property exceeded three thousand dollars, to wit: 2018 Toyota 4Runner, VIN JTEBU5JR6J5572861, owned by Hertz.

COUNT 20

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand Larceny in the Fourth Degree, in violation of New York State Penal Law § 155.30(8)**, committed as follows:

The defendants, on or about **November 18, 2019, in New York County and Ulster County, New York**, stole property, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: 2018 Toyota 4Runner, VIN JTEBU5JR6J5572861, owned by Hertz.

COUNT 21

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of a Forged Instrument in the Second Degree, in violation of New York State Penal Law § 170.25**, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2020**, in **New York County, Kings County and Westchester County, New York** possessed a forged instrument, knowing that it was forged and with the intent to defraud, deceive or injure another, they uttered or possessed any forged instrument as defined by **New York State Penal Law §170.10**, to wit: Citibank credit card number 5466160361828260.

COUNT 22

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(3)**, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2019**, in **New York County and Westchester County, New York**, knowingly and with intent to defraud, assumed the identity of another person by

presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a class D felony or higher level felony or acted as an accessory in the commission of a class D or higher level felony; to wit: Grand Larceny in the Second Degree.

COUNT 23

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO** and **TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(3)**, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2019, in New York County and Westchester County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a felony or acted as an accessory to the commission of a felony; to wit: Grand Larceny in the Fourth Degree.

COUNT 24

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand

Jury, of the crime of **Criminal Possession of a Forged Instrument in the Second Degree, in violation of New York State Penal Law § 170.25**, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2020, in New York County, Kings County and Ulster County, New York**, possessed a forged instrument, knowing that it was forged and with the intent to defraud, deceive or injure another, they uttered or possessed any forged instrument as defined by **New York State Penal Law §170.10**, to wit: Citibank credit card number 5466160441897129.

COUNT 25

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(3)**, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2019, in Ulster County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a class D felony or higher level felony or acted as an accessory in the commission of a class D or higher level felony; to wit: Grand Larceny in the Third Degree.

COUNT 26

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(3)**, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2019, in Ulster County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a felony or acted as an accessory to the commission of a felony; to wit: Grand Larceny in the Fourth Degree.

COUNT 27

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Third Degree, in violation of New York State Penal Law § 165.50**, committed as follows:

The defendants, from on or about and between **October 22, 2019, and December 26, 2019**, in **New York County, Oneida County, New York and Broward County, Florida**, knowingly possessed stolen property, with intent to

benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded three thousand dollars, to wit: a 2019 Toyota 4Runner, VIN JTEBU5JJR4K5657361.

COUNT 28

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(5)**, committed as follows:

The defendants, from on or about and between **October 22, 2019, and December 26, 2019**, in **New York County, Oneida County, New York and Broward County, Florida**, knowingly possessed stolen property, with intent to benefit themselves or persons other than the owners thereof, or impede the recovery by the owners thereof, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, other than a motorcycle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2019 Toyota 4Runner, VIN JTEBU5JJR4K5657361.

COUNT 29

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand**

Larceny in the Third Degree, in violation of New York State Penal Law § 155.35, committed as follows:

The defendants, on or about **December 23, 2019, in New York County and Oneida County, New York**, stole property, and when the value of the property exceeded three thousand dollars, to wit: a 2019 Toyota 4Runner, VIN JTEBU5JJR4K5657361.

COUNT 30

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand Larceny in the Fourth Degree, in violation of New York State Penal Law § 155.30(8)**, committed as follows:

The defendants, on or about **December 23, 2019, in New York County and Oneida County, New York**, stole property, and when the value of the property exceeded one hundred dollars and the property consists of a motor vehicle, as defined in section one hundred twenty-five of the vehicle and traffic law, to wit: a 2019 Toyota 4Runner, VIN JTEBU5JJR4K5657361.

COUNT 31

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of a Forged Instrument in the Second**

Degree, in violation of New York State Penal Law § 170.25, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2020**, in **New York County, Kings County and Oneida County**, possessed a forged instrument, knowing that it was forged and with the intent to defraud, deceive or injure another, they uttered or possessed any forged instrument as defined by **New York State Penal Law §170.10** to wit: Citibank credit card number 5466160392319586

COUNT 32

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(3)**, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2019**, **Oneida County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a class D felony or higher level felony or acted as an accessory in the commission of a class D or higher level felony; to wit: Grand Larceny in the Third Degree.

COUNT 33

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(3)**, committed as follows:

The defendants, from on or about and between **October 22, 2019 and December 26, 2019, in Oneida County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a felony or acted as an accessory to the commission of a felony; to wit: Grand Larceny in the Fourth Degree.

COUNT 34

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER, JAYVON MOORE and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Conspiracy in the Fifth Degree, in violation of New York State Penal Law § 105.05(1)**, committed as follows:

The defendants, from on or about and between **September 19, 2019, and December 24, 2019, in New York County, Westchester County and elsewhere inside and outside the State of New York**, intending that conduct constituting a

felony be performed, to wit: **Criminal Possession of Stolen Property in the Fourth Degree in violation of New York State Penal Law § 165.45(2)**, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to acquire stolen credit card information and use the stolen credit card information, fraudulent credit cards and fraudulent identification documents to purchase property or services at various retailers and hotels, in New York County, Westchester County and other jurisdictions inside and outside the State of New York. Through the use of the stolen credit card information, fraudulent credit cards and fraudulent identification documents, the members of this conspiracy obtained stolen property or services from victims, including: Acne Studios, Arlo Soho Hotel, Fred Perry, Porsche of Larchmont, Sleepare Florida LLC and Thom Browne.

It was the role of **TONY BLATHERS** to create and supply fraudulent credit cards and fraudulent identification documents to **SALIMOU DABO, TAKEK SKINNER** and other members of the conspiracy, in furtherance of this fraudulent credit card conspiracy.

It was the role of **SALIMOU DABO** to disseminate the stolen credit card information, fraudulent credit cards and fraudulent identification documents to other members of this conspiracy in furtherance of defrauding the above-named victims and to utilize the stolen credit card information, fraudulent credit cards and

fraudulent identification documents to purchase property or services from the above-named retailers in furtherance of this conspiracy.

It was the role of **TAMEK SKINNER and JAYVON MOORE** to utilize the stolen credit card information, fraudulent credit cards and fraudulent identification documents to purchase property or services from the above-named retailers in furtherance of this conspiracy, and, at times, to transport the stolen property to a location designated by **SALIMOU DABO**.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

OVERT ACTS:

In the furtherance of said Conspiracy in the Fifth Degree and to effect the objects thereof, from on or about and between September 19, 2019, and December 24, 2019, the following overt acts, among others, were committed:

1. On December 23, 2019 and December 24, 2019, **SALIMOU DABO** engaged in several phone conversations with employees at Acne Studios, a clothing store located at 33 Greene Street, New York, NY. On December 24, 2019, during one of the phone conversations between **SALIMOU DABO** and an employee of Acne Studios, **SALIMOU DABO** stated, in sum and substance, "I sent you the email. Everything, um, my card and the back. It's safe to send you guys that, its confidential, right?". During the same phone conversation, the Acne Studios employee stated, in

sum and substance, “So, it’s \$1,948.47. So, \$1,948.47 total. I’m going to put in your card number. So, it’s authorizing right now. Is it okay if I sign for you?”.

2. On December 24, 2019, **TAMEK SKINNER** went to Acne Studios [same location as listed above] and picked up the clothing that **SALIMOU DABO** had ordered over the phone using a stolen credit card number. The retail value of the clothing that **TAMEK SKINNER** picked up was \$ 2,630.97.

3. On December 24, 2019, at approximately 4:35 P.M., **TAMEK SKINNER** engaged in a phone conversation with **SALIMOU DABO**, whereby he stated, in sum and substance, “I ain’t going to lie, that shit was definitely, know the vibes in there. That place got security all through the shit. That’s a high-end store Moe. Those niggas are ready.”

4. On December 9, 2019, **SALIMOU DABO** engaged in a phone conversation with an employee of Porsche of Larchmont, whereby he stated, in sum and substance, “Yes, hi I would like to order a bumper for a 2014 Cayenne S.”

5. On December 12, 2019, **JAYVON MOORE** and **TAMEK SKINNER** were at Porsche of Larchmont, located at 2500 Boston Road, Larchmont, New York. **JAYVON MOORE** and **TAMEK SKINNER** exited the Porsche of Larchmont store with a large box and placed it in the back of a blue Audi that they were operating.

6. On December 12, 2019, at approximately 12:12 P.M., **SALIMOU DABO** engaged in a phone conversation with **TAMEK SKINNER**, whereby he stated, in sum and substances, “Yo, you go punch that shit and keep pushing bro, keep working for that. You laughing my nigga like you crazy man. If I was to pay everything these

niggas want me to pay for the Porsche like this bumper and all of this shit over here like you know what I'm saying. This is eight hundred I'm coming to pick up right now. You know what I'm saying? Like the mechanic, the shop that store it I gotta pay them cash. Them niggas like a small company like. Know what I mean? Unless I try to hit them with the slide but that shit Jersey man, when that shit come back they going to hunt you down. Yo just come I'm going to give you the, the thing man. The, the receipt."

7. On December 11, 2019, **SALIMOU DABO** engaged in a phone conversation with **TONY BLATHERS**, whereby they discussed, in sum and substance, stolen credit card information. More specifically, they referenced one of the credit cards having an expiration date of 11/21 and a CCV number of 881. This particular Royal Bank of Canada credit card, with an expiration date of 11/21 and a CCV number of 881, was then used to acquire property at Acne Studios, Fred Perry and Porsche of Larchmont.

COUNT 35

The defendants, **SALIMOU DABO, TAMEK SKINNER, JAYVON MOORE and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, committed the crime of **Scheme to Defraud in the First Degree, in violation of New York State Penal Law § 190.65(1)(b)**, as follows:

The defendants, from on or about and between **September 13, 2019, and December 24, 2019**, in the **New York County, Kings County, Westchester**

County, and elsewhere inside and outside the State of New York, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property with value in excess of one thousand dollars from one or more such persons, to wit: Acne Studios, Arlo Soho Hotel, Fred Perry, Porsche of Larchmont, Sleepare Florida LLC and Thom Browne.

COUNT 36

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER, JAYVON MOORE and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(2)**, committed as follows:

The defendants, from on or about **December 10, 2019 and December 22, 2019, in New York County and Westchester County, New York**, knowingly possessed stolen property, with intent to benefit himself or a person other than an owner thereof or to impede the recovery by an owner thereof, and when the property consisted of a credit card, to wit: Royal Bank of Canada credit card number 4646923600112333.

COUNT 37

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(2)**, committed as follows:

The defendants, on or about **December 24, 2019, in New York County, New York**, knowingly possessed stolen property, with intent to benefit himself or a person other than an owner thereof or to impede the recovery by an owner thereof, and when the property consisted of a credit card, to wit: Royal Bank of Canada credit card number 4646923200276033.

COUNT 38

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(2)**, committed as follows:

The defendants, on or about **December 24, 2019, in New York County, New York**, knowingly possessed stolen property, with intent to benefit himself or a person other than an owner thereof or to impede the recovery by an owner thereof, and when

the property consisted of a credit card, to wit: Royal Bank of Canada account number 4646923600136472.

COUNT 39

The Grand Jury of New York County, by this Indictment, accuses the defendant, **SALIMOU DABO**, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(2)**, committed as follows:

The defendant, on or about **November 5, 2019, in New York County, New York**, knowingly possessed stolen property, with intent to benefit himself or a person other than an owner thereof or to impede the recovery by an owner thereof, and when the property consisted of a credit card, to wit: Royal Bank of Canada account number 4646923200188873.

COUNT 40

The Grand Jury of New York County, by this Indictment, accuses the defendant, **SALIMOU DABO**, of the crime of **Criminal Possession of Stolen Property in the Fourth Degree, in violation of New York State Penal Law § 165.45(2)**, committed as follows:

The defendant, on or about **December 24, 2019, in New York County, New York**, knowingly possessed stolen property, with intent to benefit himself or a person other than an owner thereof or to impede the recovery by an owner thereof, and when the property consisted of a credit card, to wit: Royal Bank of Canada account number 4646913200279376.

COUNT 41

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Petit Larceny in, in violation of New York State Penal Law § 155.25**, committed as follows:

The defendants, on or about **December 22, 2019, in New York County, New York**, stole property, to wit: clothing items from Acne Studios with a retail value of \$642.36 United States Dollars.

COUNT 42

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Petit Larceny in, in violation of New York State Penal Law § 155.25**, committed as follows:

The defendants, on or about **December 22, 2019, in New York County, New York**, stole property, to wit: clothing items from Acne Studios with a retail value of \$892.78 United States Dollars.

COUNT 43

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand**

Larceny in the Fourth Degree, in violation of New York State Penal Law § 155.30(1), committed as follows:

The defendants, on **December 24, 2019, in New York County, New York**, stole property, and when the value of the property exceeded one thousand dollars, to wit: clothing items from Acne Studios with a retail value of \$1,948.97 United States Dollars.

COUNT 44

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Petit Larceny, in violation of New York State Penal Law § 155.25**, committed as follows:

The defendants, on or about **December 22, 2019, in New York County, New York**, stole property, to wit: food, gift shop items and a two-night stay at the Arlo Soho Hotel, with a retail value of \$497.46 United States Dollars.

COUNT 45

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand Larceny in the Fourth Degree, in violation of New York State Penal Law § 155.30(1)**, committed as follows:

The defendants, on or about **December 22, 2019, in New York County, New York**, stole property, and when the value of the property exceeded one thousand dollars, to wit: clothing items from Fred Perry with a retail value of \$1,045.20 United States Dollars.

COUNT 46

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TAMEK SKINNER**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Grand Larceny in the Third Degree, in violation of New York State Penal Law § 155.35(1)**, committed as follows:

The defendants, on or about **December 24, 2019, in New York County, New York**, stole property, and when the value of the property exceeded three thousand dollars, to wit: clothing items from Fred Perry with a retail value of \$3,324.72 United States Dollars.

COUNT 47

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and JAYVON MOORE**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Petit Larceny, in violation of New York State Penal Law § 155.25**, committed as follows:

The defendants, on or about **December 10, 2019, in Westchester County, New York**, stole property, to wit: a Porsche Cayenne bumper with a retail value of \$848.39 United States Dollars.

COUNT 48

The Grand Jury of New York County, by this Indictment, accuses the defendant, **SALIMOU DABO**, of the crime of **Grand Larceny in the Third Degree, in violation of New York State Penal Law § 155.35(1)**, committed as follows:

The defendant, on or about **November 5, 2019, in New York County, New York**, stole property, and when the value of the property exceeded three thousand dollars, to wit: a mattress from Sleepare Florida LLC, with a retail value of \$3,810.63 United States Dollars / \$5,147.85 Canadian Dollars.

COUNT 49

The Grand Jury of New York County, by this Indictment, accuses the defendant, **SALIMOU DABO**, of the crime of **Grand Larceny in the Third Degree, in violation of New York State Penal Law § 155.35(1)**, committed as follows:

The defendant, on or about **December 24, 2019, in New York County, New York**, stole property, and when the value of the property exceeded three thousand dollars, to wit: clothing items from Thom Browne, with a retail value of \$3,745.30 United States Dollars.

COUNT 50

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(1)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property, or services or uses credit in the name of such other person in an aggregate amount that exceeded two thousand dollars, to wit: Acne Studios goods valued at \$3,484.11 United States Dollars.

COUNT 51

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(2)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent

to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded two thousand dollars, to wit: \$3,484.11 United States Dollars of financial loss to Acne Studios.

COUNT 52

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(1)**, committed as follows:

The defendants, from on or about **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property or services or used credit in the name of such other person in an aggregate amount that exceeded five hundred dollars, to wit: Acne Studios goods valued at \$3,484.11 United States Dollars.

COUNT 53

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**,

acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(2)**, committed as follows:

The defendants, from on or about **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded five hundred dollars, to wit: \$3,484.11 United States Dollars of financial loss to Acne Studios.

COUNT 54

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(3)**, committed as follows:

The defendants, from on or about **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a felony or acted

as an accessory to the commission of a felony, to wit: Grand Larceny in the Fourth Degree.

COUNT 55

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Third Degree, in violation of New York State Penal Law § 190.78(1)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 23, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property or services or used credit in the name of such other person or caused financial loss to such person or to another person or persons, to wit: Arlo Soho Hotel services.

COUNT 56

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Third Degree, in violation of New York State Penal Law § 190.78(2)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 23, 2019**, knowingly and with intent to defraud, assumed the identity of another person by presenting himself as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby commits a class A misdemeanor or higher-level crime, to wit: Petit Larceny.

COUNT 57

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(1)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property, or services or used credit in the name of such other person in an aggregate amount that exceeded two thousand dollars, to wit: Fred Perry goods valued at \$4,369.92 United States Dollars.

COUNT 58

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**,

acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(2)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded two thousand dollars, to wit: \$4,369.92 United States Dollars in financial loss to Fred Perry.

COUNT 59

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(3)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a

class D felony or higher level felony or acted as an accessory in the commission of a class D or higher level felony, to wit: Grand Larceny in the Third Degree.

COUNT 60

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(1)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property or services or used credit in the name of such other person in an aggregate amount that exceeded five hundred dollars, to wit: Fred Perry goods valued at \$4,369.92 United States Dollars.

COUNT 61

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(2)**, committed as follows:

The defendants, from on or about from on or about and between **December 11, 2019 and December 24, 2019**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded five hundred dollars, to wit: \$4,369.92 United States Dollars in financial loss to Fred Perry.

COUNT 62

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(3)**, committed as follows:

The defendants, from on or about and between **December 11, 2019 and December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a felony or acted as an accessory to the commission of a felony, to wit: Grand Larceny in the Fourth Degree.

COUNT 63

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER, JAYVON MOORE and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree**, in violation of **New York State Penal Law § 190.79(1)**, committed as follows:

The defendants, from on or about and between **December 9, 2019 and December 12, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property or services or used credit in the name of such other person in an aggregate amount that exceeded five hundred dollars, to wit: Porsche of Larchmont goods valued at \$848.39 United States Dollars.

COUNT 64

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO, TAMEK SKINNER, JAYVON MOORE and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree**, in violation of **New York State Penal Law § 190.79(2)**, committed as follows:

The defendants, from on or about and between **December 9, 2019 and December 12, 2019**, knowingly and with intent to defraud, assumed the identity of

another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded five hundred dollars, to wit: financial loss of \$848.39 United States Dollars to Porsche of Larchmont.

COUNT 65

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(1)**, committed as follows:

The defendants, from on or about and between **November 5, 2019 and December 10, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property, or services or used credit in the name of such other person in an aggregate amount that exceeded two thousand dollars, to wit: Sleepare Florida, LLC goods valued at \$3,810.63 United States Dollars / \$5,147.85 Canadian Dollars.

COUNT 66

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each

other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(2)**, committed as follows:

The defendants, from on or about and between **November 5, 2019 and December 10, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded two thousand dollars, to wit: financial loss of \$3,810.63 United States Dollars / \$5,147.85 Canadian Dollars to Sleepare Florida LLC.

COUNT 67

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(3)**, committed as follows:

The defendants, from on or about and between **November 5, 2019 and December 10, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a

class D felony or higher level felony or acted as an accessory in the commission of a class D or higher level felony, to wit: Grand Larceny in the Third Degree.

COUNT 68

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(1)**, committed as follows:

The defendants, from on or about and between **November 5, 2019 and December 10, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property or services or used credit in the name of such other person in an aggregate amount that exceeded five hundred dollars, to wit: Sleepare Florida LLC goods valued at \$3,810.63 United States Dollars / \$5,147.85 Canadian Dollars.

COUNT 69

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(2)**, committed as follows:

The defendants, from on or about and between **November 5, 2019 and December 10, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded five hundred dollars, to wit: financial loss of \$3,810.63 United States Dollars / \$5,147.85 Canadian Dollars to Sleepare Florida LLC.

COUNT 70

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(3)**, committed as follows:

The defendants, from on or about **November 5, 2019 and December 10, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a felony or acted as an accessory to the commission of a felony, to wit: Grand Larceny in the Fourth Degree.

COUNT 71

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(1)**, committed as follows:

The defendants, on or about **December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property, or services or used credit in the name of such other person in an aggregate amount that exceeded two thousand dollars, to wit: Thom Browne goods valued at \$3,745.30 United States Dollars.

COUNT 72

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(2)**, committed as follows:

The defendants, on or about **December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or

by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded two thousand dollars, to wit: \$3,745.30 United States Dollars in financial loss to Thom Browne.

COUNT 73

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the First Degree, in violation of New York State Penal Law § 190.80(3)**, committed as follows:

The defendants, on or about **December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a class D felony or higher level felony or acted as an accessory in the commission of a class D or higher level felony, to wit: Grand Larceny in the Third Degree.

COUNT 74

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of

Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(1), committed as follows:

The defendants, on or about **December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby obtained goods, money, property or services or used credit in the name of such other person in an aggregate amount that exceeded five hundred dollars, to wit: Thom Browne goods valued at \$3,745.30 United States Dollars.

COUNT 75

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(2)**, committed as follows:

The defendants, on or about **December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby caused financial loss to such person or to another person or persons in an aggregate amount that exceeded five hundred dollars, to wit: \$3,745.30 United States Dollars in financial loss to Thom Browne.

COUNT 76

The Grand Jury of New York County, by this Indictment, accuses the defendants, **SALIMOU DABO and TONY BLATHERS**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of **Identity Theft in the Second Degree, in violation of New York State Penal Law § 190.79(3)**, committed as follows: The defendants, on or about **December 24, 2019, in New York County, New York**, knowingly and with intent to defraud, assumed the identity of another person by presenting themselves as that other person, or by acting as that other person or by using personal identifying information of that other person, and thereby committed or attempted to commit a felony or acted as an accessory to the commission of a felony, to wit: Grand Larceny in the Third Degree.

Dated: October 11, 2022
New York, New York

Nicole Keary
Deputy Attorney General
Organized Crime Task Force

By _____
Brandi Kligman
Assistant Deputy Attorney General
Statewide Organized Crime Task Force
44 South Broadway
White Plains, NY 10601

A TRUE BILL

GRAND JURY FOREPERSON
Dated: October 11, 2022