UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-20382-DPG

UNITED STATES OF AMERICA

v.

ZACHARY KAMERON RAMYARD,

Defendant.
_____/

PRELIMINARY ORDER OF FORFEITURE

THIS MATTER is before the Court for entry of a Preliminary Order of Forfeiture against the defendant Zachary Kameron Ramyard. Having reviewed the record and the applicable law, the Cour is otherwise advised in the premises, and finds as follows:

On August 29, 2024, the United States filed an Information charging the defendant with conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349. DE 4. The Information also contained forfeiture allegations, which alleged that upon conviction of a violation of 18 U.S.C. § 1349, the Defendant shall forfeit any property that constitutes or is derived from proceeds traceable to the offense *See id.* at 4–5.

On October 31, 2024, the Court accepted the defendant's guilty plea to the Information. *See* Minute Entry, DE 14; Plea Agreement ¶ 1, DE 16. As part of the guilty plea, the defendant agreed to a forfeiture money judgment in the amount of $1,288,500.

In support of the guilty plea, the defendant executed a Factual Proffer, and the Court found that there was a factual basis to support the defendant's conviction. *See* Factual Proffer, DE 15. The Factual Proffer also provided a basis for the forfeiture of property. *See id.* at 2.

As the defendant agreed in his factual proffer: Unemployment Insurance ("UI") was a joint

state and federal program that provided monetary benefits to eligible beneficiaries. UI payments were intended to provide temporary financial assistance to lawful workers who were unemployed through no fault of their own. Beginning in or around March 2020, in response to the COVID-19 pandemic, several federal programs expanded UI eligibility and increased UI benefits, including the Pandemic Unemployment Assistance Program (PUA), Federal Pandemic Unemployment Compensation Program (FPUC), and the Lost Wages Assistance Program (LWAP). In the State of California, the Employment Development Department (EDD), based in Sacramento, California, administered the UI program. Those seeking UI benefits submitted online applications. In order to successfully file an unemployment claim with EDD, the applicant had to pass an identity verification process with "ID.me" (www.id.me) by submitting the applicant's personal information, a copy of the applicant's driver's license, and a selfie photograph to ID.me for identity verification. Applicants also had to provide their name, Social Security Number (SSN), and mailing address, among other things, and to self-certify that they met a COVID-19-related reason for being unemployed, partially employed, or unable to work. The EDD relied upon the information in the application to determine UI benefits eligibility. Once an application was approved, the EDD typically distributed state and federal UI benefits electronically to a debit card, which claimants could use to withdraw funds and/or make purchases. These debit cards, which were issued by Bank of America, were sent via the U.S. Postal Service to the address the claimant provided. Claimants could activate their debit card via telephone or online.

From in or around August 2020 through in or around August 2022, the Defendant agreed with co-conspirators to submit fraudulent UI claims to the EDD on behalf of dozens of individuals without their authorization. To do so, the Defendant purchased their personal identifiable information ("PII") online and used burner phones to disguise his identity when communicating

with co-conspirators and submitting the electronic applications. The Defendant created new contact email addresses to submit and track fraudulent applications, including drjohn3900@yahoo.com. In order to verify the fraudulent applications with ID.me, the Defendant and co-conspirators created counterfeit driver's licenses with victims' PII and the faces of Co-Conspirator 1 and other co-conspirators. In turn, the Defendant instructed Co-Conspirator 1, a Miami-Dade County resident, to take selfie photographs of himself to match the counterfeit driver's licenses. The fraudulent UI claims triggered interstate wires to EDD and caused Bank of America to mail debit cards to Florida and California addresses controlled by the defendant and co-conspirators.

As a result of 68 of the Defendant's fraudulent applications in different victims' names, the California EDD deposited $1,288,500 in UI claims onto fraudulent debit cards controlled by the Defendant and co-conspirators. The Defendant used rental cars to travel throughout Florida to different ATMs to withdraw hundreds of thousands of dollars in UI funds from various debit cards. For example, on November 4, 2020, ATM surveillance shows the defendant withdrawing $980 from a debit card ending in 0371, issued to "M.O.M.," at a Bank of America ATM in Osceola County, Florida. M.O.M. confirmed that he never filed for unemployment benefits or authorized anyone to do so on his behalf. The Defendant used the fraudulent UI proceeds to make luxury purchases in Miami, Florida, and elsewhere.

Accordingly, based on the foregoing, the evidence in the record, and for good cause shown, it is hereby **ORDERED** that:

1. Pursuant 18 U.S.C. § 981(a)(1)(C) and Rule 32.2 of the Federal Rules of Criminal Procedure, a forfeiture money judgment in the amount of $1,288,500 is hereby entered against the defendant.

2. The United States is authorized to conduct any discovery that might be necessary to identify, locate, or dispose of forfeited property, and to resolve any third-party petition, pursuant to Rule 32.2(b)(3), (c)(1)(B) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(m).

3. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Order is final as to the defendant.

4. The Court shall retain jurisdiction in this matter for the purpose of enforcing this Order, and pursuant to Rule 32.2(e)(1) of the Federal Rules of Criminal Procedure, shall amend this Order, or enter other orders as necessary, to forfeit additional specific property when identified.

DONE AND ORDERED in Miami, Florida, this 26th day of March 2025.

DARRIN P. GAYLES
UNITED STATES DISTRICT JUDGE