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DISTRICT OF ARIZONA
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REDACTED FOR
PUBLIC DISCLOSURE

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF ARIZONA

12 United States of America,
13
14 Plaintiff,

15 vs.

16 Jeremie Andrew Sowerby,
17
18 Defendant.

No. CR-23-1757-PHX-SMB (ASB)

INDICTMENT

VIO: 18 U.S.C. § 1343
(Wire Fraud)
Counts 1-37

18 U.S.C. § 1957(a)
(Transactional Money Laundering)
Counts 38-50

18 U.S.C. § 981(a)(1)(C);
18 U.S.C. § 982(a)(1);
21 U.S.C. § 853;
28 U.S.C. § 2461(c)
(Forfeiture Allegations)

22
23 THE GRAND JURY CHARGES:

24 1. On or about and between November 2018 through November 2019, in the
25 District of Arizona and elsewhere, defendant Jeremie Andrew Sowerby (“SOWERBY”),
26 and others known and unknown to the Grand Jury, under the guise of a fraudulent business
27 called Dunamis Global Technologies (“Dunamis” or “DGT”), scammed at least 150
28 victims out of millions in a cryptocurrency investment fraud scheme.

1 victim's purported investment in particular machines; and the number of machines in
2 inventory was far less than what investors were told were in service of any kind based on
3 their investments).

4 • That he "owned" the Tempe and Lakeside warehouses where mining
5 machines were purportedly housed.

6 • That he had negotiated a 75-year utility contract for a mere 5 cents per
7 kilowatt hour power for the Lakeside facility. Instead, to the extent any machines were
8 hooked up to power in Lakeside, the cost was not discounted. This lie was a further
9 inducement to victims because mining machines consume a great deal of power.

10 • That he had special contacts and arrangements for purchasing state-of-the-
11 art mining machines at discounted prices before being made available to the public.

12 • That he had another special deal with a mining manufacturer to produce,
13 solely for Dunamis, certain proprietary mining machines dubbed "Hash Destroyers"
14 purportedly using never-before-seen technology.

15 • That victims' "earnings" were directed to individual crypto wallets for each
16 victim, when SOWERBY configured all mining machines to direct profits only to a
17 Dunamis company wallet controlled solely by defendant.

18 • That victims were told that Dunamis sold many Siacoin mining machines to
19 victims when very few were ever purchased. Those few Siacoin machines that were hooked
20 up to power did little or no mining of cryptocurrency.

21 • SOWERBY, in PowerPoint presentations, claimed he had "High Capacity
22 Secure Mining Spaces (HCSMS)" that had:

- 23 a. A high capacity electrical supply;
- 24 b. Discounted/subsidized energy machines;
- 25 c. 24/7/365 technical support;
- 26 d. A state-of-the-art security system; and
- 27 e. A fiber optic internet connection.

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THE SCHEME

11. The factual allegations in Paragraphs 1 to 10 are incorporated by reference and re-alleged as though fully set forth herein.

12. From in or about and between November 2018 through November 2019, defendant JEREMIE ANDREW SOWERBY, and others, devised and intended to devise a scheme to defraud Dunamis investors, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

13. It was part of the scheme:

a. That defendant SOWERBY fraudulently stated at conferences, marketing materials, and in private communications with prospective victim-investors that he had extensive business relationships abroad and outside Arizona.

b. That defendant fraudulently told victim-investors that he and others would make their initial investments back within months with significant profits thereafter, and that profits were digitally transferred to computer-based wallets that victims were falsely told they could access and liquidate immediately.

c. That defendant misled existing victims into luring others into investing in this fraudulent scheme by promising unrealistic, unattainable and guaranteed rates of return, and creating false but generally unachievable recruiting incentives (i.e., lavish cars, vacations, jewelry).

COUNTS 1-37
18 U.S.C. § 1343
[Wire Fraud]

14. The factual allegations in the preceding paragraphs of this Indictment are re-alleged and incorporated as though fully set forth herein.

15. Beginning at a time unknown to the Grand Jury, but at least as early as November 2018, and continuing until the present, in the District of Arizona and elsewhere, defendant JEREMIE ANDREW SOWERBY knowingly and willfully devised and intended to devise a scheme and artifice to defraud and to obtain money and property by

1 means of materially false and fraudulent pretenses, representations, and promises, and by
2 intentional concealment and omission of material facts.

3 16. On or about each of the dates set forth below, for the purpose of executing
4 the scheme described above, defendant SOWERBY did knowingly transmit or caused to
5 be transmitted by means of wire communication in interstate commerce to certain writings,
6 pictures, signals, and sounds with each wire transmission constituting a separate count:

Count	On or About Wire Date	Sender	Recipient	Amount
1	12/17/2018	L.D.	Global Works LLC (Chase Account -6773).	\$3,000.00
2	12/24/2018	T.M.	Dunamis Service (Wells Fargo Account -7585).	\$14,000.00
3	1/8/2019	L.D.	Global Works LLC (Chase Account -6773).	\$7,200.00
4	1/25/2019	L.C.	Global Works LLC (Chase Account -6773).	\$4,800.00
5	1/25/2019	T.M.	Global Works LLC (Chase Account -6773).	\$500.00
6	1/29/2019	F.J.	Dunamis Service (Wells Fargo Account -7585).	\$14,400.00
7	1/29/2019	T.M.	Dunamis Service (Wells Fargo Account -7585).	\$21,000.00
8	2/7/2019	T.M.	Dunamis Service (Wells Fargo Account -7585).	\$21,600.00
9	2/15/2019	D.L.	Dunamis Service (Wells Fargo Account -7585).	\$7,200.00
10	2/19/2019	T.M.	Dunamis Service (Wells Fargo Account -7585).	\$46,100.00
11	2/22/2019	F.J.	Dunamis Service (Wells Fargo Account -7585).	\$7,200.00
12	2/22/2019	F.J.	Dunamis Service (Wells Fargo Account -7585).	\$7,200.00
13	3/1/2019	F.J.	Dunamis Service (Wells Fargo Account -7585).	\$7,200.00
14	3/1/2019	T.M.	Dunamis Service (Wells Fargo Account -7585).	\$7,200.00

1	15	3/4/2019	G.H.	Global Works LLC (Chase Account -6773).	\$10,000.00
2	16	3/4/2019	L.D.	Global Works LLC (Chase Account -6773).	\$20,400.00
3	17	3/19/2019	A.R.	Dunamis Service (Wells Fargo Account -7585).	\$72,000.00
4	18	4/1/2019	J.W.	Dunamis Service (Wells Fargo Account -7585).	\$5,000.00
5	19	4/1/2019	W.S.	Dunamis Service (Wells Fargo Account -7585).	\$122,000.00
6	20	4/2/2019	G.H.	Global Works LLC (Chase Account -6773).	\$10,400.00
7	21	4/2/2019	G.H.	Global Works LLC (Chase Account -6773).	\$10,000.00
8	22	4/3/2019	B.J.	Dunamis Service (Wells Fargo Account -7585).	\$12,200.00
9	23	4/15/2019	R.M	Global Works LLC (Chase Account -6773).	\$69,000.00
10	24	4/17/2019	R.M	Global Works LLC (Chase Account -6773).	\$69,000.00
11	25	4/19/2019	W.S.	Dunamis Service (Wells Fargo Account -7585).	\$12,200.00
12	26	4/23/2019	D.L.	Global Works LLC (Chase Account -6773).	\$13,000.00
13	27	5/15/2019	K.T.	Dunamis Service (Wells Fargo Account -7585).	\$12,200.00
14	28	5/29/2019	R.M	Dunamis Service (Wells Fargo Account -7585).	\$4,200.00
15	29	5/29/2019	T.J.	Dunamis Service (Wells Fargo Account -7585).	\$12,200.00
16	30	5/29/2019	W.S.	Dunamis Service (Wells Fargo Account -7585).	\$10,200.00
17	31	6/4/2019	L.C.	Dunamis Service (Wells Fargo Account -7585).	\$1,200.00
18	32	6/4/2019	V.C.	Dunamis Service (Wells Fargo Account -7585).	\$1,200.00
19	33	6/10/2019	B.J.	Global Works LLC (Chase Account -6773).	\$36,600.00
20	34	7/2/2019	W.S.	Dunamis Service (Wells Fargo Account -7585).	\$130,000.00

35	8/2/2019	P.W.	Global Works LLC (Chase Account -6773).	\$32,000.00
36	10/18/2019	W.J.	Global Works LLC (Chase Account -6773).	\$1,365.80
37	12/2/2019	J.W.	Dunamis Global Technologies (US Bank Account -3708).	\$1,284.10

All in violation of Title 18, United States Code, Section 1343.

COUNT 38-50
18 U.S.C. § 1957(a)
[Transactional Money Laundering]

17. The factual allegations in the preceding paragraphs of this Indictment are re-alleged and incorporated as though fully set forth herein.

18. On or about the dates set forth below, in the District of Arizona and elsewhere, defendant JEREMIE ANDREW SOWERBY knowingly engaged in monetary transactions, of a value greater than \$10,000, occurring within the United States, with funds criminally derived from the Wire Fraud in violation of 18 U.S.C. § 1343, with each transaction being a separate count of this Indictment:

Count	Date	Monetary Transaction	Transaction Amount
38	3/28/2019	Purchase of a cashier's check payable to Tesla.	\$41,732.00
39	4/3/2019	Purchase of a cashier's check payable to Empire West Title.	\$11,929.13
40	4/26/2019	Purchase of a cashier's check payable to First Arizona Title.	\$43,455.23
41	6/28/2019	Purchase of a cashier's check payable to Tesla.	\$28,910.60
42	7/24/2019	Check payable to H.S.	\$12,000.00
43	8/12/2019	Wire transfer to J.S.	\$15,000.00
44	8/26/2019	Check payable to Mesa DJ Center.	\$14,000.00
45	8/27/2019	Wire transfer to J.T.	\$30,700.00

46	8/30/2019	Wire transfer to SMFI Advanced Business Concepts.	\$17,500.00
47	9/3/2019	Check payable to Radical Movement Inc.	\$15,000.00
48	9/4/2019	Wire transfer to J.S.	\$15,000.00
49	9/5/2019	Intrabank account transfer to Palmer Vending.	\$125,000.00
50	9/10/2019	Intrabank account transfer to Palmer Vending.	\$50,000.00

All in violation of Title 18, United States Code, Section 1957(a).

FORFEITURE ALLEGATION

**[18 U.S.C. § 981(a)(1)(C); 18 U.S.C. § 982(a)(1);
21 U.S.C. § 853; 28 U.S.C. § 2461(c)]**

19. The factual allegations in Counts 1 through 50 in the preceding paragraphs of this Indictment are re-alleged and incorporated as though fully set forth herein.

20. Pursuant to Title 18, United States Code, Sections 981 and 982, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c), and upon conviction of one or more of the offenses alleged in Counts 1 through 50 of this Indictment, defendant(s) shall forfeit to the United States all right, title, and interest in any and all property, real or personal, involved in such offense(s), or any property traceable to such property involved in the offense(s), or conspiracy to commit such offense(s), including the following: (a) all money or other property that was the subject of each transaction, transportation, transmission or transfer in violation of a statute listed in Title 18, United States Code, Section 982, (b) all other property constituting proceeds obtained as a result of those violations, and (c) all property used in any manner or part to commit or to facilitate the commission of those violations including, but not limited to the sum of money representing the amount of money involved in the offense(s).

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (1) cannot be located upon the exercise of due diligence,
- (2) has been transferred or sold to, or deposited with, a third party,

1 If any of the above-described forfeitable property, as a result of any act or omission
2 of the defendant(s):

3 (1) cannot be located upon the exercise of due diligence,

4 (2) has been transferred or sold to, or deposited with, a third party,

5 (3) has been placed beyond the jurisdiction of the court,

6 (4) has been substantially diminished in value, or

7 (5) has been commingled with other property which cannot be divided without
8 difficulty,

9 it is the intent of the United States to seek forfeiture of any other property of said
10 defendant(s) up to the value of the above-described forfeitable property, pursuant to Title
11 21, United States Code, Section 853(p).

12 All in accordance with Title 18, United States Code, Sections 981 and 982, Title 21,
13 United States Code, Section 853, Title 28, United States Code, Section 2461(c), and Rule
14 32.2, Federal Rules of Criminal Procedure.

15
16 A TRUE BILL

17
18 s/
19 FOREPERSON OF THE GRAND JURY
Date: December 12, 2023

20 GARY M. RESTAINO
21 United States Attorney
District of Arizona

22 s/
23 PETER SEXTON
24 LINDSAY SHORT
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