

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 26-mj-6103-DSW

UNITED STATES OF AMERICA

v.

ANA DALILA VEGA,

Defendant.

FILED BY SM D.C.

Feb 26, 2026

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

Respectfully submitted,

JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY

By: /s/ Alexander Thor Pogozelski
Alexander Thor Pogozelski
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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

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ANGELA E. NOBLE
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United States of America)

v.)

Ana Dalila Vega)

Case No. 26-mj-6103-DSW

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2023 through January 2024 in the county of Broward in the

Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1349

Conspiracy to Commit Bank Fraud

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.



Complainant's signature

Tyler Halls, Special Agent, USSS

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by

Date: 2/26/2026



Judge's signature

City and state: Ft. Lauderdale, Florida

Hon. Detra Shaw-Wilder, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Tyler Halls, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent with the United States Secret Service and have been so employed since June 2024. During the course of my career, I have received training in conducting criminal investigations relating to the financial infrastructure of the United States. I have completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, and the United States Secret Service James J. Rowley Training Center in Beltsville, Maryland. I am currently assigned to the Protective Intelligence Squad in the Miami Field Office. Prior to my Protective Intelligence assignment, I was assigned to a criminal investigations squad where I participated in investigations into bank fraud, wire fraud, cybercrimes, identity theft, and access device fraud.

2. This affidavit is submitted in support of a criminal complaint charging that, between in or around March 2023 and continuing through in or around January 2024, Ana Dalila Vega (“VEGA”) conspired with Co-Conspirator 1, Co-Conspirator 2, and others to commit bank fraud, in violation of Title 18, United States Code, Section 1349.

3. The facts contained in this affidavit are based on my personal knowledge, as well as information provided to me by other law enforcement agents and officers involved in this investigation. Because this affidavit is being submitted for the limited purpose of establishing sufficient probable cause for the requested criminal complaint, it does not constitute all the facts known to law enforcement at this time.

The Defendant and Relevant Persons and Entities

4. **VEGA**, a resident of Broward County, was employed by Citibank as a Personal Banker from approximately October 2017 until on or about January 15, 2024. During the conspiracy, **VEGA** worked at Citibank branches located in the Southern District of Florida.

5. Citibank was a financial institution with offices located in the Southern District of Florida whose accounts were insured by the Federal Deposit Insurance Corporation.

6. Co-Conspirator 1 resided in the same apartment building as **VEGA** during the relevant time period and used an alias instead of his real name when interacting with **VEGA**.

7. Co-Conspirator 2 was a resident of Broward County.¹

8. Company 1 was a company formed under the laws of Nevada.

9. Victim C.A. was a resident of New York who held a bank account at Citibank.

10. Victim I.M. was a resident of New York who held a bank account at Citibank.

PROBABLE CAUSE

11. **VEGA**, in her capacity as a Personal Banker at Citibank, interacted with customers and provided banking services above and beyond simple deposits and withdrawals, primarily to clients who visited the branch in person. These services included, among other things, opening accounts for individuals or businesses at the bank, adding authorized signers to existing customer accounts, and processing wire transfers.

12. According to records provided by Citibank, on or about March 15, 2023, **VEGA** was the Personal Banker responsible for facilitating a fraudulent and unauthorized wire transfer in the approximate amount of \$60,000 from the Citibank account of victim C.A. to a JPMorgan Chase account in the name of "GETTHEBREAD LLC."

¹ Co-Conspirator 2 has not been charged.

13. According to surveillance footage provided by Citibank, on or about December 12, 2023, Co-Conspirator 2 visited the Citibank branch where **VEGA** worked and met with **VEGA**. During a voluntary, non-custodial interview of **VEGA** conducted by law enforcement (detailed further below), **VEGA** was shown photos of Co-Conspirator 2, as well as surveillance footage from the bank. **VEGA** stated she recalled Co-Conspirator 2. According to **VEGA**, during Co-Conspirator 2's initial visit to the branch, Co-Conspirator 2 told **VEGA** that Co-Conspirator 2's account – which in reality was Victim I.M.'s account – was blocked and Co-Conspirator 2 needed **VEGA** to unblock the account so that Co-Conspirator 2 could make a transfer from the account. **VEGA** stated that, as part of the verification process to unblock Victim I.M.'s account, Co-Conspirator 2 provided **VEGA** a T-Mobile phone number that matched the phone number listed in Victim I.M.'s account as well as photo identification that supported Co-Conspirator 2's claim that she was the account holder for Victim I.M.'s account. According to **VEGA**, she refused Co-Conspirator 2's request because the photo identification provided by Co-Conspirator 2 was that of a female, while Victim I.M. was a male.

14. According to surveillance footage provided by Citibank, Co-Conspirator 2 returned to the branch where **VEGA** worked the following day – on or about December 13, 2023 – along with a male individual. In her initial interview with law enforcement, **VEGA** stated that Co-Conspirator 2 returned to the bank with an unidentified male who presented photo identification identifying himself as Victim I.M. **VEGA** stated that she then completed the verification process for Co-Conspirator 2.

15. According to records provided by Citibank, on or about December 13, 2023, **VEGA** added Co-Conspirator 2 as an authorized signer on Victim I.M.'s account.

16. On or about December 14, 2023, Co-Conspirator 2 initiated approximately ten (10) fraudulent wire transfers, totaling approximately \$1 million, from Victim I.M.'s Citibank account to a personal brokerage account in Co-Conspirator 2's name.

17. According to surveillance footage provided by Citibank, on or about December 15, 2023, Co-Conspirator 2 returned to the branch and met with **VEGA**. According to information provided by Citibank, Victim I.M.'s account was blocked after Co-Conspirator 2 fraudulently initiated the \$1 million in wire transfers on or about December 14, 2025. According to information provided by Citibank, **VEGA** unblocked Victim I.M.'s account on or about December 15, 2023 – the same day surveillance footage shows Co-Conspirator 2 meeting with **VEGA**.

18. Also on or about December 15, 2023, Co-Conspirator 2 initiated two fraudulent wire transfers, totaling approximately \$224,958, from Victim I.M.'s Citibank account to a Bank of America account in the name of Company 1. On or about December 18 and 19, 2023, Co-Conspirator 2 initiated two additional fraudulent wire transfers, totaling approximately \$98,000, from Victim I.M.'s Citibank account to a Bank of America account in the name of Company 1.

19. On or about September 6, 2024, law enforcement interviewed Victim I.M. about the fraudulent transactions in his account. Victim I.M. stated that he had not authorized any other individuals to be added as signers on his account and had not authorized any of the approximately \$1.3 million in fraudulent wire transfers from his account in December 2023. Victim I.M. further stated that he did not know or recognize Co-Conspirator 2 or Company 1, the recipients of the fraudulent wire transfers from Victim I.M.'s account.

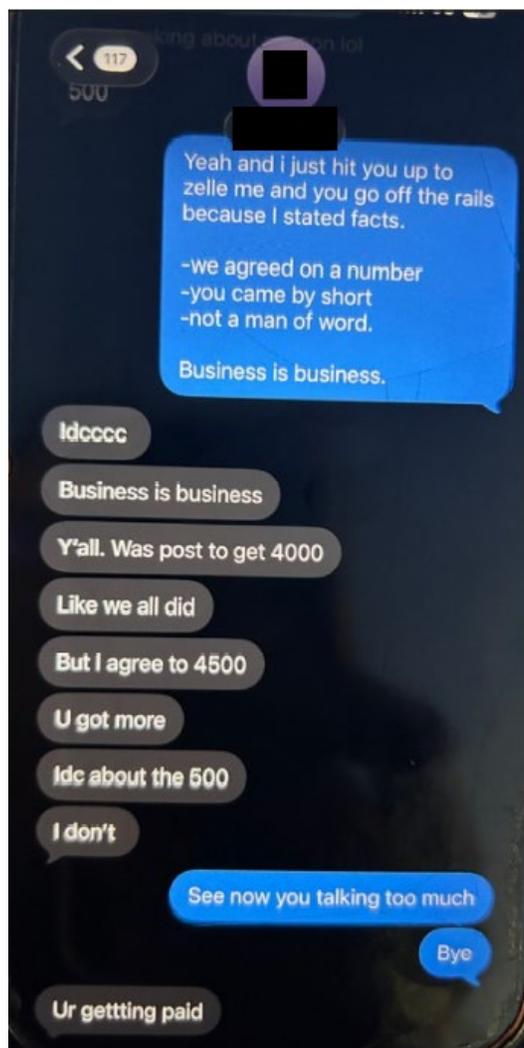
20. As stated above, **VEGA** was voluntarily interviewed by law enforcement regarding these fraudulent transactions. This first interview was conducted on November 20, 2025, in the parking lot where **VEGA** worked at the time. In addition to her admissions above, **VEGA** stated during this interview that she had first met Co-Conspirator 1 in her apartment building.² According to **VEGA**, Co-Conspirator 1 sold drugs and was aware that **VEGA** worked for a bank. **VEGA** stated that Co-Conspirator 1 told her he needed some help with a few accounts at Citibank. Specifically, Co-Conspirator 1 told **VEGA** he needed **VEGA**'s help unlocking different accounts at Citibank, adding new account holders to accounts at Citibank, and transferring money out of accounts at Citibank. Co-Conspirator 1 explained to **VEGA** that certain individuals would visit **VEGA** at the bank, and that **VEGA** needed to assist them with making wire transfers. **VEGA** admitted that she agreed to help Co-Conspirator 1 by unblocking certain Citibank accounts, adding authorized signers to Citibank accounts, and transferring funds between accounts. When **VEGA** asked Co-Conspirator 1 why he was sending people to her to unblock the accounts and transfer money, Co-Conspirator 1 told **VEGA**, "the less you know, the better." **VEGA** explained that each time Co-Conspirator 1 instructed her to move funds to different accounts, Co-Conspirator 1 would tell her who she needed to look for and what she needed to do when those individuals came to **VEGA**'s branch. **VEGA** admitted that Co-Conspirator 2 was one of the individuals Co-Conspirator 1 sent to the bank to conduct fraudulent transactions. **VEGA** also recalled the company GETTHEBREAD LLC because the name stuck out to her. **VEGA** acknowledged that she knew the individuals Co-Conspirator 1 sent to the bank to meet with **VEGA** did not have legal access to the accounts

² While **VEGA** initially denied engaging in any fraudulent activity and denied knowing Co-Conspirator 1, when confronted with evidence of her involvement, **VEGA** admitted to her criminal conduct, as discussed below.

and that the money in those accounts did not belong to those individuals. **VEGA** further admitted that she knew Co-Conspirator 1 was committing fraud and she knew what she was doing was illegal. **VEGA** stated that Co-Conspirator 1 paid her in lump-sum cash payments for her help in carrying out the fraud scheme but that she always argued with Co-Conspirator 1 regarding the amount of money she received for helping Co-Conspirator 1. **VEGA** estimated that Co-Conspirator 1 paid her somewhere between \$3,000 and \$4,000 in total but could not provide an exact figure.

21. On or about February 11, 2026, law enforcement conducted another voluntary, non-custodial interview of **VEGA** at a Starbucks. During the interview, **VEGA** explained that she primarily communicated with Co-Conspirator 1 in person but also exchanged text messages and used the messaging application Telegram with Co-Conspirator 1. **VEGA** showed law enforcement text exchanges she had with Co-Conspirator 1. When asked about a text message she received from Co-Conspirator 1 on or about February 13, 2023, which simply stated, “nothing landed,” **VEGA** explained that this meant a money/wire transfer had not yet been received by a bank. **VEGA** also showed law enforcement text messages between her and Co-Conspirator 1 dated on or about February 3, 2023, and allowed law enforcement to take a photo of the messages. These text messages discussed the money Co-Conspirator 1 was supposed to pay **VEGA** for her role in the fraud scheme, as depicted below:³

³ **VEGA**'s messages are on the right-hand side of the image while Co-Conspirator 1's messages are on the left-hand side of the image.



22. During this second interview, **VEGA** also recalled that Co-Conspirator 1 shared with her an article about an individual who was arrested for fraudulent conduct similar to that which they had engaged in and advised her to be careful. **VEGA** subsequently did some research, located the article, and sent it to law enforcement on or about February 11, 2026. The article was a press release issued by the Department of Justice on February 22, 2024, about an individual who was arrested in Miami for committing bank fraud and aggravated identity theft by obtaining the personally identifiable information of various bank account holders, posing as the account holders, fraudulently accessing their accounts, and causing more than \$2 million

in wire transfers from the victims' accounts. The victims in this case were Citibank account holders.

23. According to information obtained from the U.S. Department of Homeland Security ("DHS"), on or about January 17, 2026, **VEGA** booked a one-way ticket to Nicaragua, departing on February 26, 2026. As of the date of this affidavit, information available to DHS shows that **VEGA** has not booked a return trip to the United States.

24. On or about February 23, 2026, upon learning of **VEGA**'s travel plans, law enforcement contacted **VEGA** by telephone. This telephone conversation was recorded. During the recorded phone call, law enforcement asked **VEGA** if she could meet with them this week on Thursday, February 26, or Friday, February 27. **VEGA** stated she could not meet with law enforcement those days because she was having problems with her car and requested that they meet the following week, when she "hop[ed]" to have her car back from the dealership. **VEGA** made no mention of her plan to travel to Nicaragua.

25. During this recorded call, **VEGA** discussed her most recent contacts with Co-Conspirator 1 and agreed that she had previously told law enforcement that she recalled Co-Conspirator 2 visiting **VEGA** at Citibank and telling her (**VEGA**) that Co-Conspirator 1 had sent her. **VEGA** also reiterated that Co-Conspirator 1 sent her the article (DOJ press release) about an individual who was arrested for bank fraud and stated, "that's the guy I told you he (Co-Conspirator 1) hangs around with." **VEGA** agreed that she had seen Co-Conspirator 1 with the individual from the press release.⁴

⁴ The individual from the press release was indicted in the Southern District of Florida for committing the same type of fraud scheme as **VEGA**, Co-Conspirator 1, and Co-Conspirator 2, and the victims of his crimes were clients of Citibank. The time period alleged in the indictment was April 2022 through March 2023. This individual has since pleaded guilty and was sentenced to 65 months' incarceration.

26. Based on the foregoing facts, I respectfully submit that that there is probable cause to believe that, between in or around March 2023 and continuing through in or around January 2024, **VEGA** conspired with Co-Conspirator 1, Co-Conspirator 2, and others to commit bank fraud, in violation of Title 18, United States Code, Section 1349.

27. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief this 26th day of February, 2026, in Miami, Florida.

FURTHER AFFIANT SAYETH NAUGHT.



Tyler Halls, Special Agent
United States Secret Service

Attested to by the Applicant in accordance with the requirements of Federal Rule of Criminal Procedure 4.1 by Face Time this 26th day of February, 2026

Detra Shaw-Wilder

THE HONORABLE DETRA SHAW-WILDER
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 26-mj-6103-DSW

BOND RECOMMENDATION

DEFENDANT: Ana Dalila Vega

PTD
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: 
AUSA: Alexander Thor Pogozelski

Last Known Address: 2165 VAN BUREN ST APT 707
HOLLYWOOD, FL 33020-5195

What Facility: Broward County Jail

Agent(s): S/A Dennis McCarty
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)
FDIC-OIG