



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

VALENTINE IRO,

aka "Iro Enterprises,"

aka "Valentine Obinna Iro,"

aka "Obinna Iro,"

aka "Obinna Nassa,"

CHUKWUDI CHRISTOGUNUS IGBOKWE,

aka "Christogunus C.

Igbokwe,"

aka "Chris Kudon,"

aka "Atete,"

aka "Still Kudon,"

JERRY ELO IKOGHO,

aka "J Man,"

IZUCHUKWU KINGSLEY UMEJESI,

aka "Kingsley Umejesi,"

aka "Armenian Man,"

aka "Kingsley LA,"

aka "Izukung Aka Aku,"

ADEGOKE MOSES OGUNGBE,

aka "P & P Motors,"

aka "Pp,"

ALBERT LEWIS CATHEY,

aka "Alb,"

aka "Abert Jag,"

aka "Al,"

TITYAYE MARINA MANSBANGURA,

aka "Tityaye Igbokwe,"

aka "Marina Mansour,"

aka "Marina Mansaray,"

CR No. 19-

19CR00380 FMO

I N D I C T M E N T

[18 U.S.C. § 1956(h): Conspiracy to Engage in Money Laundering; 18 U.S.C. § 1349: Conspiracy to Commit Wire Fraud, Mail Fraud, and Bank Fraud; 18 U.S.C. § 1343: Wire Fraud; 18 U.S.C. § 1344(2): Bank Fraud; 18 U.S.C. § 1956(a)(1)(B)(i): Money Laundering; 18 U.S.C. § 1957: Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity; 18 U.S.C. §§ 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C): Operating an Unlicensed Money Transmitting Business; 18 U.S.C. § 2232(a): Destruction of Property to Prevent Seizure; 18 U.S.C. § 1001(a)(2): False Statements; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 2(a): Aiding and Abetting; 18 U.S.C. §§ 981 and 982 and 28 U.S.C. § 2461(c): Criminal Forfeiture]

1 aka "Marina Tityaye Mans
 Bangura,"
 2 CHUKWUDI COLLINS AJAEZE,
 aka "Thank You Jesus"
 3 EKENE AUGUSTINE EKECHUKWU,
 aka "Ogedi Power,"
 4 aka "Power,"
 CHUKS EROHA,
 5 aka "Chuks Nassa Iro,"
 aka "Nassa,"
 6 aka "Prince Chuddy,"
 aka "Nurse Chuddy,"
 7 COLLINS NNAEMEKA OJIMBA,
 aka "Collins Emeka Ojimba,"
 8 aka "Ojimba Collins,"
 aka "Charly.Africa,"
 9 FNU LNU,
 aka "Xplora G,"
 10 UCHENNA OCHIAGHA,
 aka "Urch Agu,"
 11 aka "Advanced Mega Plus Ltd,"
 NNAMDI THEOJOSEPH DURU,
 12 aka "Duru Theo Joseph
 Nnamdi,"
 13 aka "Williams High School,"
 aka "Ifytyps,"
 14 ERICSON UCHE OFORKA,
 aka "Oforka,"
 15 aka "Eric Oforka,"
 MARK IFEANYI CHUKWUOCHA,
 16 aka "Mark Iheanyi
 Chukwuocha,"
 17 aka "Chukwu Mark,"
 aka "Markife,"
 18 AUGUSTINE NNAMDI,
 aka "Nnamdi Augustine,"
 19 aka "Jazz,"
 CHIEMEZIE CHRISTOPHER CHILAKA,
 20 aka "Fanta,"
 CHARLES OHAJIMKPO,
 21 aka "Giggs,"
 aka "Ryan Giggs,"
 22 aka "Charles,"
 STANLEY UGOCHUKWU UCHE,
 23 aka "Ugo Law,"
 aka "Uche Stanley,"
 24 aka "He is risen.Happy
 Easter!,"
 25 CHIKA AUGUSTINE ODIONYENMA,
 aka "Tony Augustin
 Odionyenma,"
 26 aka "Chika Tony,"
 27 aka "CTA Finance Source
 Intl,"
 28 PASCHAL CHIMA OGBONNA,

1 aka "Chima,"
 aka "Paschal,"
 2 SAMUEL NNAMDI ONWUASOANYA,
 aka "Sammy Lee Nnamdi,"
 3 aka "Onwuasoanya Samuel
 Nnamdi,"
 4 aka "Enugu Ogo,"
 MACWILLIAM CHINONSO CHUKWUOCHA,
 5 aka "ChiBoy,"
 EMMANUEL ONYEKA UZOKA,
 6 aka "Emmanuel Mansion,"
 aka "Mansion,"
 7 aka "Son of God,"
 aka "Ezirim Uzoma,"
 8 JOSHUA ANIEFIOK AWAK,
 aka "Joe Awk,"
 9 aka "Kwee Tin Law,"
 GEORGE UGOCHUKWU EGWUMBA,
 10 aka "George Ugo,"
 aka "Ugo Aunty Scholar,"
 11 UCHECHUKWU SOLOMON EZIRIM,
 aka "Uche Nwanne,"
 12 aka "Uche Ezirim,"
 AUGUSTINE IFEANYI OKAFOR,
 13 aka "Zero,"
 aka "St.Austine,"
 14 aka "Austine,"
 aka "Ifeanyichukwu Okafor,"
 15 FNU LNU,
 aka "Okay Sam Mal,"
 16 LESLIE N. MBA,
 aka "Mystical,"
 17 aka "Nwachinemere Leslie,"
 OGOCHUKWU INNOCENT IKEWESI,
 18 aka "Ogoo UK,"
 aka "Innocent Ikewesi,"
 19 EMMANUEL UZOMA OGANDU,
 aka "Nwachinaemere,"
 20 aka "Uzoma,"
 AMARACHUKWU HARLEY ANYANWU,
 21 aka "GodisGod,"
 aka "War B,"
 22 BRIGHT IFEANYI AZUBUIKE,
 aka "Bright Bauer Azubuike,"
 23 aka "Ifeanyi Jnr,"
 EMEKA MOSES NWACHUKWU,
 24 aka "All Man,"
 aka "Omalitoto,"
 25 FNU LNU,
 aka "Donatus Izunwanne,"
 26 aka "Izunwanne Donatus
 Chibuikem,"
 27 aka "Deworlddonmax,"
 CHINWENDU KENNETH OSUJI,
 28 aka "Father,"

1 EUSEBIUS UGOCHUKWU ONYEKA,
 aka "Ugo UK,"
 2 aka "sly19 sly,"
 CHIDI ANUNOBI,
 3 aka "Anunobi Chidi,"
 aka "Chidioo,"
 4 ANTHONY NWABUNWANNE OKOLO,
 aka "Eric West,"
 5 aka "Erci West,"
 aka "Code,"
 6 OBINNA CHRISTIAN ONUWA,
 aka "Papa Chukwuezugbo,"
 7 aka "Obinna Onuwa Abala,"
 aka "Obyno Abala,"
 8 CHIJIJOKE CHUKWUMA ISAMADE,
 aka "Mr CJ,"
 9 aka "CJ,"
 LINUS NNAMDI MADUFOR,
 10 aka "Madufor Nnamdi,"
 CHRYSAUGONUS NNEBEDUM,
 11 aka "Cris,"
 UGOCHUKWU OKEREKE,
 12 aka "Blade,"
 aka "Kingsly Cris,"
 13 aka "Okereke Ugochukwu,"
 FIDEL LEON ODIMARA,
 14 aka "Fiedel Odimara,"
 aka "Ndaa,"
 15 aka "Dee Dutchman,"
 KINGSLEY CHINEDU ONUDOROGU,
 16 aka "OBJ,"
 DESSI NZENWAH,
 17 aka "Desmond Sage,"
 aka "Des Nzenwa,"
 18 aka "Saga Lounge,"
 CHIMAROKÉ OBASI,
 19 aka "Chima Russia"
 JAMES CHIGOZIE AGUBE,
 20 aka "Smart,"
 aka "Smart Agube,"
 21 aka "Smart Chigozie Agube"
 CHIMAOBI UZOZIE OKORIE,
 22 aka "Omaobi,"
 aka "Mobility,"
 23 OGOCHUKWU OHIRI,
 aka "Ogomegbulam Ohiri,"
 24 aka "Ologbo,"
 KENNEDY CHIBUEZE UGWU,
 25 aka "Kennedy David,"
 IFEANYICHUKWU OLUWADAMILARE
 26 AGWUEGBO,
 aka "B🌐\$\$ IFFY,"
 27 VICTOR IFEANYI CHUKWU,
 aka "Ifeannyi Soccer,"
 28 aka "Vic Chux,"

1 CHIDI EMMANUEL MEGWA,
 aka "Cantr,"
 2 aka "Canta Jr.,"
 PRINCEWILL ARINZE DURU,
 3 aka "Arnzi Prince Will,"
 aka "Arinze,"
 4 DESMOND IWU,
 aka "Desmond Chigozie Iwu,"
 5 aka "Lalaw,"
 aka "Odo Desmond,"
 6 ONYEKA VINCENT CHIKA,
 aka "Chyco,"
 7 aka "Chika Ejima,"
 aka "Vincent Chika Onyeka,"
 8 IFEANYI KINGSLEY MEZIENWA,
 aka "Ifeanyi Ali,"
 9 aka "Ifeanyichukwu Mezienwa,"
 VICTOR UCHENNA AGUH,
 10 aka "Orch Sod,"
 aka "Uche SP,"
 11 aka "Rich Homie Urch,"
 KEVIN AMARACHI ESHIMBU,
 12 aka "Humble,"
 aka "Humble Amarachukwu,"
 13 aka "Dato Humble,"
 VITALIS KELECHI ANOZIE,
 14 aka "Kelechi Vitalis Anozie,"
 aka "Kelechi Anozieh,"
 15 aka "Pastor Kel Anozie,"
 aka "Pastor Kc,"
 16 aka "Choice,"
 WILLIAMS OBIORA AGUNWA,
 17 aka "Don Williams,"
 GEORGE CHIMEZIE DIKE,
 18 aka "Chimekros,"
 aka "Slim Dad...No...1,"
 19 MUNACHISO KYRIAN UKACHUKWU,
 aka "Muna,"
 20 NWANNEBUIKE OSMUND,
 aka "Osmund Nwannebuike,"
 21 aka "Olivite,"
 aka "Nikky Bro.,"
 22 CHIDIEBERE FRANKLIN NWANGWU,
 aka "Frank Chidi,"
 23 aka "Franklin Nwangwu,"
 aka "Agogo,"
 24 DAMIAN UCHECHUKWU AJAH,
 aka "Uche Ajah,"
 25 aka "Ajah Damian Uchechukwu,"
 aka "Uchechukwu Demian Ajah,"
 26 EMEKA P. EJIOFOR,
 aka "Ejiofor Emeka,"
 27 LAWRENCE CHUKWUMA UBASINEKE,
 aka "Ubasineke Chuks,"
 28 aka "Chukwuma Ubasineke,"

CHINEDU BRIGHT IBETO,
aka "Doggy,"
aka "Doggy Lucino,"
VALENTINE AMARACHI NWANEGWO,
aka "Satis,"
aka "Satis Amarachi Satis,"
EMMANUEL CHIDIEBERE DIKE,
aka "Emmanet,"
JEREMIAH UTIEYIN EKI,
aka "Uti,"
CHINAKA DAVIDSON IWUOHA,
aka "Tmrw Afrika Will Wake
Up,"
aka "Cookie,"
aka "All Africa Media
Network,"
CHIMA DARLINGTON DURU,
aka "Kajad,"
aka "Kajad Jesus,"
IKENNA CHRISTIAN IHEJIUREME,
aka "Piper,"
aka "Am Happy!,"
OBI ONYEDIKA MADEKWE,
aka "Odu Investment,"

Defendants.

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

A. Defendants

1. Defendants VALENTINE IRO, also known as ("aka") "Iro Enterprises," aka "Valentine Obinna Iro," aka "Obinna Iro," aka "Obinna Nassa" ("IRO"); JERRY ELO IKOGHO, aka "J Man" ("IKOGHO"); IZUCHUKWU KINGSLEY UMEJESI, aka "Kingsley Umejesi," aka "Armenian Man," aka "Kingsley LA," aka "Izuking Aka Aku" ("UMEJESI"); ADEGOKE MOSES OGUNGBE, aka "P & P Motors," aka "Pp" ("OGUNGBE"); ALBERT LEWIS CATHEY, aka "Alb," aka "Abert Jag," aka "Al" ("CATHEY"); TITYAYE MARINA MANSBANGURA, aka "Tityaye Igbokwe," aka "Marina Mansour," aka "Marina Mansaray," aka "Marina Tityaye Mans Bangura" ("MANSBANGURA"); EKEKE AUGUSTINE EKECHUKWU, aka "Ogedi Power," aka "Power"

1 ("EKECHUKWU"); COLLINS NNAEMEKA OJIMBA, aka "Collins Emeka Ojimba,"
2 aka "Ojimba Collins," aka "Charly.Africa" ("OJIMBA"); GEORGE
3 UGOCHUKWU EGWUMBA, aka "George Ugo," aka "Ugo Aunty Scholar"
4 ("EGWUMBA"); VICTOR IFEANYI CHUKWU, aka "Ifeannyi Soccer," aka "Vic
5 Chux" ("CHUKWU"); CHIDI EMMANUEL MEGWA, aka "Cantr," aka "Canta Jr."
6 ("MEGWA"); and NWANNEBUIKE OSMUND, aka "Osmund Nwannebuike," aka
7 "Olivite," aka "Nikky Bro." ("OSMUND"), resided within the Central
8 District of California.

9 2. Defendant CHUKWUDI CHRISTOGUNUS IGBOKWE, aka "Christogunus
10 C. Igbokwe," aka "Chris Kudon," aka "Atete," aka "Still Kudon"
11 ("IGBOKWE") resided in Nigeria until on or about January 17, 2017,
12 and thereafter resided within the Central District of California.

13 3. Defendant CHUKWUDI COLLINS AJAEZE, aka "Thank You Jesus"
14 ("AJAEZE") resided in Nigeria until on or about June 19, 2017, and
15 thereafter resided within the Central District of California.

16 4. Defendant CHUKS EROHA, aka "Chuks Nassa Iro," aka "Nassa,"
17 aka "Prince Chuddy," aka "Nurse Chuddy" ("EROHA") resided within the
18 Central District of California until on or about July 29, 2017, and
19 thereafter resided outside the United States.

20 5. Defendant MACWILLIAM CHINONSO CHUKWUOCHA, aka "ChiBoy"
21 ("MACWILLIAM CHUKWUOCHA"); EMMANUEL ONYEKA UZOKA, aka "Emmanuel
22 Mansion," aka "Mansion," aka "Son of God," aka "Ezirim Uzoma"
23 ("UZOKA"); CHIJIJOKE CHUKWUMA ISAMADE, aka "Mr CJ," aka "CJ"
24 ("ISAMADE"); FIDEL LEON ODIMARA, aka "Fiedel Odimara," aka "Ndaa,"
25 aka "Dee Dutchman" ("ODIMARA"); KENNEDY CHIBUEZE UGWU, aka "Kennedy
26 David" ("UGWU"); IFEANYICHUKWU OLUWADAMILARE AGWUEGBO, aka "B👤\$\$
27 IFFY" ("AGWUEGBO"); PRINCEWILL ARINZE DURU, aka "Arnzi Prince Will,"
28 aka "Arinze" ("P. DURU"); and MUNACHISO KYRIAN UKACHUKWU, aka "Muna"

1 ("UKACHUKWU") resided in the United States, outside the Central
2 District of California.

3 6. CHIEMEZIE CHRISTOPHER CHILAKA, aka "Fanta" ("CHILAKA")
4 resided within the United States, outside the Central District of
5 California, between on or about January 17, 2017 and March 18, 2017,
6 and otherwise resided outside of the United States.

7 7. Defendant JOSHUA ANIEFIOK AWAK, aka "Joe Awk," aka "Kwee
8 Tin Law" ("AWAK") resided in Nigeria until on or about August 25,
9 2018, and thereafter resided within the Central District of
10 California.

11 8. Defendants First Name Unknown ("FNU") Last Name Unknown
12 ("LNU"), aka "Xplora G" ("XPLOA G"); UCHENNA OCHIAGHA, aka "Urch
13 Agu," aka "Advanced Mega Plus Ltd" ("OCHIAGHA"); NNAMDI THEOJOSEPH
14 DURU, aka "Duru Theo Joseph Nnamdi," aka "Williams High School," aka
15 "Ifytyns" ("N. DURU"); ERICSON UCHE OFORKA, aka "Oforka," aka "Eric
16 Oforka" ("OFORKA"); MARK IFEANYI CHUKWUOCHA, aka "Mark Iheanyi
17 Chukwuocha," aka "Chukwu Mark," aka "Markife" ("MARK CHUKWUOCHA");
18 AUGUSTINE NNAMDI, aka "Nnamdi Augustine," aka "Jazz" ("NNAMDI");
19 CHARLES OHAJIMKPO, aka "Giggs," aka "Ryan Giggs," aka "Charles"
20 ("OHAJIMKPO"); STANLEY UGOCHUKWU UCHE, aka "Ugo Law," aka "Uche
21 Stanley," aka "He is risen.Happy Easter!" ("UCHE"); CHIKA AUGUSTINE
22 ODIONYENMA, aka "Tony Augustin Odionyenma," aka "Chika Tony," aka
23 "CTA Finance Source Intl" ("ODIONYENMA"); PASCHAL CHIMA OGBONNA, aka
24 "Chima," aka "Paschal" ("OGBONNA"); SAMUEL NNAMDI ONWUASOANYA, aka
25 "Sammy Lee Nnamdi," aka "Onwuasoanya Samuel Nnamdi," aka "Enugu Ogo"
26 ("ONWUASOANYA"); UCHECHUKWU SOLOMON EZIRIM, aka "Uche Nwanne," aka
27 "Uche Ezirim" ("EZIRIM"); AUGUSTINE IFEANYI OKAFOR, aka "Zero," aka
28 "St.Austine," aka "Austine," aka "Ifeanyichukwu Okafor" ("OKAFOR");

1 FNU LNU, aka "Okay Sam Mal" ("SAM MAL"); LESLIE N. MBA, aka
2 "Mystical," aka "Nwachinemere Leslie" ("MBA"); OGOCHUKWU INNOCENT
3 IKEWESI, aka "Ogoo UK," aka "Innocent Ikewesi" ("IKEWESI"); EMMANUEL
4 UZOMA OGANDU, aka "Nwachinaemere," aka "Uzoma" ("OGANDU");
5 AMARACHUKWU HARLEY ANYANWU, aka "GodisGod," aka "War B" ("ANYANWU");
6 BRIGHT IFEANYI AZUBUIKE, aka "Bright Bauer Azubuike," aka "Ifeanyi
7 Jnr" ("AZUBUIKE"); EMEKA MOSES NWACHUKWU, aka "All Man," aka
8 "Omalitoto" ("NWACHUKWU"); FNU LNU aka "Donatus Izunwanne," aka
9 "Izunwanne Donatus Chibuikem," aka "Deworlddonmax" ("IZUNWANNE");
10 CHINWENDU KENNETH OSUJI, aka "Father" ("OSUJI"); EUSEBIUS UGOCHUKWU
11 ONYEKA, aka "Ugo UK," aka "sly19 sly" ("ONYEKA"); CHIDI ANUNOBI, aka
12 "Anunobi Chidi," aka "Chidioo" ("ANUNOBI"); ANTHONY NWABUNWANNE
13 OKOLO, aka "Eric West," aka "Erci West," aka "Code" ("OKOLO"); OBINNA
14 CHRISTIAN ONUWA, aka "Papa Chukwuezugbo," aka "Obinna Onuwa Abala,"
15 aka "Obyno Abala" ("ONUWA"); LINUS NNAMDI MADUFOR, aka "Madufor
16 Nnamdi" ("MADUFOR"); CHRYSAUGONUS NNEBEDUM, aka "Cris" ("NNEBEDUM");
17 UGOCHUKWU OKEREKE, aka "Blade," aka "Kingsly Cris," aka "Okereke
18 Ugochukwu" ("OKEREKE"); KINGSLEY CHINEDU ONUDOROGU, aka "OBJ"
19 ("ONUDOROGU"); DESSI NZENWAH, aka "Desmond Sage," aka "Des Nzenwa,"
20 aka "Saga Lounge" ("NZENWAH"); CHIMAROKÉ OBASI, aka "Chima Russia"
21 ("OBASI"); JAMES CHIGOZIE AGUBE, aka "Smart," aka "Smart Agube," aka
22 "Smart Chigozie Agube" ("AGUBE"); CHIMAOBI UZOZIE OKORIE, aka
23 "Omaobi," aka "Mobility" ("OKORIE"); OGOCHUKWU OHIRI, aka
24 "Ogomegbulam Ohiri," aka "Ologbo" ("OHIRI"); DESMOND IWU, aka
25 "Desmond Chigozie Iwu," aka "Lalaw," aka "Odo Desmond" ("IWU");
26 ONYEKA VINCENT CHIKA, aka "Chyco," aka "Chika Ejima," aka "Vincent
27 Chika Onyeka" ("CHIKA"); IFEANYI KINGSLEY MEZIENWA, aka "Ifeanyi
28 Ali," aka "Ifeanyichukwu Mezienwa" ("MEZIENWA"); VICTOR UCHENNA AGUH,

aka "Orch Sod," aka "Uche SP," aka "Rich Homie Urch" ("AGUH"); KEVIN AMARACHI ESHIMBU, aka "Humble," aka "Humble Amarachukwu," aka "Dato Humble" ("ESHIMBU"); VITALIS KELECHI ANOZIE, aka "Kelechi Vitalis Anozie," aka "Kelechi Anozieh," aka "Pastor Kel Anozie," aka "Pastor Kc," aka "Choice" ("ANOZIE"); WILLIAMS OBIORA AGUNWA, aka "Don Williams" ("AGUNWA"); GEORGE CHIMEZIE DIKE, aka "Chimekros," aka "Slim Dad...No...1" ("G. DIKE"); CHIDIEBERE FRANKLIN NWANGWU, aka "Frank Chidi," aka "Franklin Nwangwu," aka "Agogo" ("NWANGWU"); DAMIAN UCHECHUKWU AJAH, aka "Uche Ajah," aka "Ajah Damian Uchechukwu," aka "Uchechukwu Demian Ajah" ("AJAH"); EMEKA P. EJIOFOR, aka "Ejiofor Emeka" ("EJIOFOR"); LAWRENCE CHUKWUMA UBASINEKE, aka "Ubasineke Chuks," aka "Chukwuma Ubasineke" ("UBASINEKE"); CHINEDU BRIGHT IBETO, aka "Doggy," aka "Doggy Lucino" ("IBETO"); VALENTINE AMARACHI NWANEGWO, aka "Satis," aka "Satis Amarachi Satis" ("NWANEGWO"); EMMANUEL CHIDIEBERE DIKE, aka "Emmanet" ("E. DIKE"); JEREMIAH UTIEYIN EKI, aka "Uti" ("EKI"); CHINAKA DAVIDSON IWUOHA, aka "Tmrw Afrika Will Wake Up," aka "Cookie," aka "All Africa Media Network" ("IWUOHA"); CHIMA DARLINGTON DURU, aka "Kajad," aka "Kajad Jesus" ("C. DURU"); and IKENNA CHRISTIAN IHEJIUREME, aka "Piper," aka "Am Happy!" ("IHEJIUREME") resided outside of the United States.

9. OBI ONYEDIKA MADEKWE, aka "Odu Investment" ("MADEKWE") resided in the United States until on or about April 18, 2017, and thereafter resided outside the United States.

B. Unindicted Coconspirators

10. Unindicted Coconspirator #1 ("UICC 1"), UICC 2, UICC 7, UICC 9, UICC 10, UICC 11, UICC 12, UICC 13, UICC 14, UICC 15, UICC 16, UICC 17, UICC 18, UICC 20, UICC 21, UICC 22, UICC 23, and UICC 24 resided within the Central District of California.

1 11. UICC 8 and UICC 19 resided in the United States, outside
2 the Central District of California.

3 12. UICC 3, UICC 4, UICC 5, UICC 6, UICC 25, and 26 resided
4 outside of the United States.

5 C. Financial Institutions

6 13. At all times relevant to this Indictment, Bank of America
7 N.A. ("BOA"), BBVA Compass Bancshares, Inc. ("Compass Bank"), CalCom
8 Federal Credit Union ("CalCom FCU"), Capital One Bank ("Capital
9 One"), Citibank N.A. ("Citibank"), Citizens Financial Group
10 ("Citizens Bank"), Comerica Bank ("Comerica"), J.P. Morgan Chase N.A.
11 ("Chase"), PNC Bank, Regions Financial Corporation ("Regions Bank")
12 SunTrust Bank ("SunTrust"), TD Bank N.A. ("TD Bank"), US Bank N.A.
13 ("US Bank"), and Wells Fargo Bank, N.A. ("Wells Fargo") were
14 federally insured financial institutions.

15 D. Terminology

16 14. Business email compromise ("BEC") frauds may occur when a
17 hacker gains unauthorized access to a business email account, blocks
18 or redirects communications to and/or from the email account, and
19 then uses the compromised email account or a separate fraudulent
20 email account to communicate with personnel from a victim company,
21 attempting to trick them into making an unauthorized wire transfer.

22 15. Escrow fraud is a variation of a BEC fraud scheme, in which
23 a hacker may gain unauthorized access to the email account of an
24 escrow company or real estate agent, and then communicate with an
25 unsuspecting person who is seeking to purchase property, directing
26 that person to make a down-payment for purchase of property to a
27 fraudulent bank account, rather than the legitimate bank account of
28 an escrow company.

1 16. Romance scams target persons looking for romantic partners
2 or friendship on dating websites and other social media platforms.
3 The scammers may create profiles using fictitious or fake names,
4 locations, images, and personas, allowing the scammers to cultivate
5 relationships with prospective romance scam victims. Victims may be
6 convinced to provide money or gifts to the scammers, or may be asked
7 to conduct transactions on behalf of the scammers.

COUNT ONE

[18 U.S.C. § 1956(h)]

[ALL DEFENDANTS]

17. The Grand Jury re-alleges and incorporates paragraphs 1 through 16 of the Introductory Allegations of this Indictment here.

A. OBJECTS OF THE CONSPIRACY

18. Beginning on a date unknown to the Grand Jury, but no later than October 7, 2014, and continuing through an unknown date, but no earlier than on or about May 2, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendants IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA, XPLOA G, OCHIAGHA, N. DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA, OHAJIMKPO, UCHE, ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM CHUKWUOCHA, UZOKA, AWAK, EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA, IKEWESI, OGANDU, ANYANWU, AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI, ONYEKA, ANUNOBI, OKOLO, ONUWA, ISAMADE, MADUFOR, NNEBEDUM, OKEREKE, ODIMARA, ONUDOROGU, NZENWAH, OBASI, AGUBE, OKORIE, OHIRI, UGWU, AGWUEGBO, CHUKWU, MEGWA, P. DURU, IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE, AGUNWA, G. DIKE, UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR, UBASINEKE, IBETO, NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, IHEJIUREME, and MADEKWE, together with UICC 1 through UICC 26 and others known and unknown to the Grand Jury, knowingly conspired:

a. to conduct and attempt to conduct, financial transactions, affecting interstate and foreign commerce, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, which, in fact, involved

1 the proceeds of specified unlawful activity – namely, wire fraud, in
2 violation of Title 18, United States Code, Section 1343; mail fraud,
3 in violation of Title 18, United States Code, Section 1341; and bank
4 fraud, in violation of Title 18, United States Code, Section 1344(2)
5 – and knowing that the transactions were designed in whole and in
6 part to conceal and disguise the nature, location, source, ownership,
7 and control of the proceeds, in violation of Title 18, United States
8 Code, Section 1956(a)(1)(B)(i);

9 b. to transport, transmit, and transfer, and attempt to
10 transport, transmit, and transfer, funds from a place in the United
11 States to a place outside of the United States, knowing that the
12 property involved in the financial transactions represented the
13 proceeds of some form of unlawful activity, and which property was,
14 in fact, the proceeds of specified unlawful activity – namely, wire
15 fraud, in violation of Title 18, United States Code, Section 1343;
16 mail fraud, in violation of Title 18, United States Code, Section
17 1341; and bank fraud, in violation of Title 18, United States Code,
18 Section 1344(2) – and knowing that the transactions were designed in
19 whole and in part to conceal and disguise the nature, location,
20 source, ownership, and control of the proceeds, in violation of Title
21 18, United States Code, Section 1956(a)(2)(B)(i); and

22 c. to engage and attempt to engage in monetary
23 transactions involving criminally derived property of a value greater
24 than \$10,000, affecting interstate and foreign commerce, which was
25 derived from specified unlawful activity – namely, wire fraud, in
26 violation of Title 18, United States Code, Section 1343; mail fraud,
27 in violation of Title 18, United States Code, Section 1341; and bank
28 fraud, in violation of Title 18, United States Code, Section 1344(2)

1 – and knowing that the funds represented the proceeds of some form of
2 unlawful activity, in violation of Title 18, United States Code,
3 Section 1957.

4 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
5 ACCOMPLISHED

6 19. The objects of the conspiracy were to be accomplished, in
7 substance, as follows:

8 a. Defendants UMEJESI, OGUNGBE, EKECHUKWU, XPLORA G,
9 OCHIAGHA, N. DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA,
10 OHAJIMKPO, UCHE, ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM
11 CHUKWUOCHA, UZOKA, AWAK, EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA,
12 IKEWESI, OGANDU, ANYANWU, AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI,
13 ONYEKA, ANUNOBI, OKOLO, ONUWA, ISAMADE, MADUFOR, NNEBEDUM, OKEREKE,
14 ODIMARA, ONUDOROGU, NZENWAH, OBASI, AGUBE, OKORIE, OHIRI, UGWU,
15 AGWUEGBO, CHUKWU, MEGWA, IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE,
16 AGUNWA, G. DIKE, UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR,
17 UBASINEKE, IBETO, NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, and
18 IHEJIUREME would ask defendants IRO, IGBOKWE, and EROHA for a bank
19 account or money service account into which they could fraudulently
20 induce a victim to deposit funds from a BEC fraud, escrow fraud,
21 romance scam, or other fraudulent scheme.

22 b. In response to such a request, defendants IRO,
23 IGBOKWE, and EROHA would (i) select a bank account or money service
24 account that had previously been opened in order to receive
25 fraudulently-obtained funds, which could receive the fraudulently-
26 obtained funds; (ii) request that a coconspirator, including
27 defendants UMEJESI, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, OJIMBA,
28 ISAMADE, MEGWA, IKEWESI, ONYEKA, NZENWAH, P. DURU, and OBASI, provide

1 the account information for a bank account or money service account,
2 which could receive the fraudulently-obtained funds; or (iii) cause a
3 bank account or money service account to be opened, which could
4 receive the fraudulently-obtained funds.

5 i. For a bank account that was to be opened,
6 defendants IRO and IGBOKWE would request that a coconspirator,
7 including defendants UMEJESI, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU,
8 OJIMBA, ISAMADE, and P. DURU, open or cause to be opened a bank
9 account, which these coconspirators and others acting at their
10 direction would do through use of false or fraudulent pretenses,
11 representations, and promises, and concealment of material facts.

12 ii. For a bank account opened in a business name,
13 defendants IRO, IGBOKWE, EROHA, UMEJESI, CATHEY, MANSBANGURA, AJAEZE,
14 EKECHUKWU, OJIMBA, AWAK, ISAMADE, and P. DURU would file, or would
15 cause to be filed, a false and fraudulent Fictitious Business Name
16 Statement at the Los Angeles County Registrar-Recorder/County Clerk's
17 Office.

18 c. Defendants IRO, IGBOKWE, and EROHA would send
19 defendants UMEJESI, OGUNGBE, EKECHUKWU, XPLORA G, OCHIAGHA, N. DURU,
20 OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA, OHAJIMKPO, UCHE,
21 ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM CHUKWUOCHA, UZOKA, AWAK,
22 EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA, IKEWESI, OGANDU, ANYANWU,
23 AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI, ONYEKA, ANUNOBI, OKOLO, ONUWA,
24 ISAMADE, MADUFOR, NNEBEDUM, OKEREKE, ODIMARA, ONUDOROGU, NZENWAH,
25 OBASI, AGUBE, OKORIE, OHIRI, UGWU, AGWUEGBO, CHUKWU, MEGWA, IWU,
26 CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE, AGUNWA, G. DIKE, UKACHUKWU,
27 OSMUND, NWANGWU, AJAH, EJIOFOR, UBASINEKE, IBETO, NWANEGWO, E. DIKE,
28 EKI, IWUOHA, C. DURU, and IHEJIUREME the account information for the

1 bank account or money service account that could be used to receive
2 fraudulently-obtained funds. For such a bank account, defendants
3 IRO, IGBOKWE, and EROHA would, at a minimum, send the account number
4 and the routing number.

5 d. Defendants IRO, IGBOKWE, and EROHA would come to an
6 agreement with defendants UMEJESI, OGUNGBE, EKECHUKWU, XPLORA G,
7 OCHIAGHA, N. DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA,
8 OHAJIMKPO, UCHE, ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM
9 CHUKWUOCHA, UZOKA, AWAK, EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA,
10 IKEWESI, OGANDU, ANYANWU, AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI,
11 ONYEKA, ANUNOBI, OKOLO, ONUWA, ISAMADE, MADUFOR, NNEBEDUM, OKEREKE,
12 ODIMARA, ONUDOROGU, NZENWAH, OBASI, AGUBE, OKORIE, OHIRI, UGWU,
13 AGWUEGBO, CHUKWU, MEGWA, IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE,
14 AGUNWA, G. DIKE, UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR,
15 UBASINEKE, IBETO, NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, and
16 IHEJIUREME regarding the percentage of the fraudulently-obtained
17 funds that defendants IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, CATHEY,
18 MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA, ISAMADE, MEGWA, and P.
19 DURU would receive for their receiving and laundering services.

20 e. Defendants UMEJESI, OGUNGBE, EKECHUKWU, XPLORA G,
21 OCHIAGHA, N. DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA,
22 OHAJIMKPO, UCHE, ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM
23 CHUKWUOCHA, UZOKA, AWAK, EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA,
24 IKEWESI, OGANDU, ANYANWU, AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI,
25 ONYEKA, ANUNOBI, OKOLO, ONUWA, ISAMADE, MADUFOR, NNEBEDUM, OKEREKE,
26 ODIMARA, ONUDOROGU, NZENWAH, OBASI, AGUBE, OKORIE, OHIRI, UGWU,
27 AGWUEGBO, CHUKWU, MEGWA, IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE,
28 AGUNWA, G. DIKE, UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR,

1 UBASINEKE, IBETO, NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, and
2 IHEJIUREME, or their coconspirators, would, through false or
3 fraudulent pretenses, representations, and promises, and concealment
4 of material facts, persuade a victim to deposit, wire, or transfer
5 funds into a bank account or money service accounts identified by
6 defendants IRO, IGBOKWE, and EROHA.

7 f. Defendants and coconspirators would also make false or
8 fraudulent statements, representations, and promises, and conceal
9 material facts, in order to avoid discovery of the fraudulent nature
10 of the deposit, wire, or transfer.

11 g. Defendants IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE,
12 CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA, ISAMADE,
13 MEGWA, and P. DURU would withdraw, and attempt to withdraw, the
14 fraudulently-obtained funds from a bank account or money service
15 account, including through cash withdrawals, wire transfers, teller
16 transfers, check cashing, and deposits into further accounts used by
17 or under the control of defendants IRO, IGBOKWE, IKOGHO, UMEJESI,
18 OGUNGBE, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA,
19 ISAMADE, MEGWA, and P. DURU, and other coconspirators working at
20 their direction, before the victim became aware of the fraudulent
21 nature of the transactions, so as to obtain the money and so as to
22 conceal and disguise the nature, location, source, ownership and
23 control of the proceeds.

24 h. When a bank would question the source of the funds or
25 nature of a transaction, defendants IRO, IGBOKWE, IKOGHO, UMEJESI,
26 OGUNGBE, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA,
27 ISAMADE, MEGWA, and P. DURU, and others acting at their direction,
28 would lie and make material omissions about their ownership of and

entitlement to the funds, or the source of the funds, so as to obtain the money and so as to avoid detection and conceal the fact that the funds were fraudulently obtained from a victim.

i. Defendants IRO, IGBOKWE, UMEJESI, CATHEY, and MANSBANGURA would, on occasion, deposit funds, or cause funds to be deposited, into the bank account of an illicit and unlicensed money exchanger, including defendants IKOGHO, OGUNGBE, and MADEKWE, who would then transfer other funds from Nigerian bank accounts that they controlled to the Nigerian bank accounts of coconspirators.

Alternatively, defendants IRO and IGBOKWE would, on occasion, direct UICC 3, UICC 4, UICC 5, and UICC 6 to transfer other funds from Nigerian bank accounts that they controlled to the Nigerian bank accounts of coconspirators.

C. OVERT ACTS

20. In furtherance of the conspiracy, and to accomplish its objects, defendants IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA, XPLORA G, OCHIAGHA, N. DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA, OHAJIMKPO, UCHE, ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM CHUKWUOCHA, UZOKA, AWAK, EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA, IKEWESI, OGANDU, ANYANWU, AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI, ONYEKA, ANUNOBI, OKOLO, ONUWA, ISAMADE, MADUFOR, NNEBEDUM, OKEREKE, ODIMARA, ONUDOROGU, NZENWAH, OBASI, AGUBE, OKORIE, OHIRI, UGWU, AGWUEGBO, CHUKWU, MEGWA, P. DURU, IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE, AGUNWA, G. DIKE, UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR, UBASINEKE, IBETO, NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, IHEJIUREME, and MADEKWE, together with others known and unknown to the Grand Jury, on or about the dates set forth below, committed and caused to be committed

various overt acts, in the Central District of California and elsewhere, including, but not limited to, the following:

Victim M.S.

Overt Act No. 1: On or about September 3, 2015, defendant IRO sent defendant OGBONNA account information, including the account number and the routing number, for a Chase checking account ending in 9837 of defendant IRO, doing business as ("dba") "VOI Enterprises," in Carson, California ("Chase 9837 Account"), with the instruction to have victim M.S. include the following payment information in the notes of the wire transfer: "INV: VOI53753."

Overt Act No. 2: On or about September 3, 2015, an unknown coconspirator fraudulently induced M.S. to send a wire transfer of approximately \$23,000 from her BOA account in Monterey Park, California to IRO's Chase 9837 Account, with the wire transfer notes reading "OTHER INVOICE NO. VOI53753."

Overt Act No. 3: On or about September 4, 2015, defendant IRO withdrew approximately \$14,000 from the Chase 9837 Account and wrote on the withdrawal slip, "for Lexus RX330 and RX300."

Overt Act No. 4: On or about September 4, 2015, defendant IRO wrote a check to a relative for approximately \$1,500 from the Chase 9837 Account, and wrote on the memo line, "2002 Nissan Optima."

Overt Act No. 5: On or about September 8, 2015, an unknown coconspirator fraudulently induced M.S. to send a wire transfer of approximately \$46,500 from her BOA account in Monterey Park, California to defendant IRO's Chase 9837 Account.

Overt Act No. 6: On or about September 8, 2015, defendant IRO withdrew approximately \$8,000 from the Chase 9837 Account and wrote on the withdrawal slip, "Mercedes 2011 and Lexis RX 350 2008."

1 Overt Act No. 7: On or about September 10, 2015, defendant
2 IRO withdrew approximately \$30,000 from the Chase 9837 Account and
3 wrote on the withdrawal slip, "for Acura MDX 2007."

4 Overt Act No. 8: On or about September 10, 2015, defendant
5 IRO withdrew approximately \$9,000 from the Chase 9837 Account.

6 Overt Act No. 9: On or about September 10, 2015, an unknown
7 coconspirator fraudulently induced M.S. to send a wire transfer of
8 approximately \$4,700 from her BOA account in Monterey Park,
9 California to defendant IRO's Chase 9837 Account.

10 Overt Act No. 10: On or about September 11, 2015, defendant
11 IRO wrote a check to an acquaintance for approximately \$7,700, and
12 wrote on the memo line, "Camry 207 and Camry 05."

13 Overt Act No. 11: On or about September 14, 2015, defendant
14 IRO sent OGBONNA the instruction to have victim M.S. include the
15 following payment information in the notes of the wire transfer:
16 "Invoice number: VOI00462 R MODEL 89."

17 Overt Act No. 12: On or about September 14, 2015, an unknown
18 coconspirator fraudulently induced M.S. to send a wire transfer of
19 approximately \$17,000 from her BOA account in Monterey Park,
20 California to defendant IRO's Chase 9837 Account, with a wire
21 transfer note reading "INVOICE NO. VOI 00462 R MODEL 89."

22 Overt Act No. 13: On or about September 17, 2015, defendant
23 IRO withdrew approximately \$10,000 from the Chase 9837 Account.

24 Overt Act No. 14: On or about September 17, 2015, defendant
25 IRO withdrew approximately \$20,000 from the Chase 9837 Account.

26 Overt Act No. 15: On or about September 17, 2015, defendant
27 IRO withdrew approximately \$5,000 from the Chase 9837 Account.

Victim Company 2

Overt Act No. 16: On or about February 12, 2016, an unknown coconspirator fraudulently induced Victim Company 2 to send a wire transfer of approximately \$186,686 from its United Bank of Africa account to defendant IRO's Chase 9837 Account.

Overt Act No. 17: On or about February 12, 2016, defendant IRO transferred approximately \$188,600 from the Chase 9837 Account to a Chase savings account ending in 0820 of defendant IRO, dba "VOI Enterprises," in Carson, California ("Chase 0820 Account").

Overt Act No. 18: On or about February 12, 2016, defendant IRO transferred approximately \$161,700 from the Chase 0820 Account to the Chase 9837 Account.

Overt Act No. 19: On or about February 16, 2016, defendant IRO sent a wire transfer of approximately \$132,950 from the Chase 9837 Account to a Wells Fargo account ending in 6061 of defendant IRO, dba "Irva Auto Sales & Equip Broker LLC," in Carson, California ("Wells Fargo 6061 Account"), with a wire transfer note reading "Invoice: Mack Rd Model 2010 X."

Overt Act No. 20: On or about February 16, 2016, defendant IRO sent a wire transfer of approximately \$28,670 from the Chase 9837 Account to the bank account ending in 3107 of UICC 7 at CalCom FCU, in Torrance, California ("CalCom 3107 Account"), with the wire transfer note reading "Menhien Auction On Wednesday."

Overt Act No. 21: On or about February 16, 2016, UICC 7 attempted to send a wire transfer of approximately \$27,500 from the CalCom 3107 Account to the Wells Fargo 6061 Account, with the wire transfer note reading "Invoice for IRVA4646."

Overt Act No. 22: On or about February 16, 2016, defendant IRO sent a wire transfer of approximately \$50,000 from the Wells Fargo 6061 Account to a BOA account ending in 1824.

Overt Act No. 23: On or about February 16, 2016, defendant IRO withdrew approximately \$50,000 from the Wells Fargo 6061 Account.

Overt Act No. 24: On or about February 18, 2016, defendant IRO sent a wire transfer of approximately \$30,500 from the Chase 9837 Account to a Chase account ending in 1279 of UICC 8.

Victim R.B.

Overt Act No. 25: On or about March 31, 2016, an unknown coconspirator fraudulently induced R.B. to send a wire transfer of approximately \$18,000 from her Wells Fargo account in Panama City Beach, Florida, to a bank account at Comerica ending in 2663 of defendant IRO, dba "IRVA Auto Sales & Equip Broker LLC," in Carson, California ("Comerica 2663 Account").

Overt Act No. 26: On or about March 31, 2016, defendant ODIONYENMA emailed to defendant IRO a photograph of the wire transfer request for approximately \$18,000 submitted by R.B., which wire transfer request contained R.B.'s name, Florida driver's license number, address, phone number, and Wells Fargo bank account number.

Overt Act No. 27: On or about April 4, 2016, an unknown coconspirator fraudulently induced R.B. to send a wire transfer of approximately \$39,000 from her Wells Fargo account in Panama City Beach, Florida, to the Comerica 2663 Account.

Overt Act No. 28: On or about April 4, 2016, defendant ODIONYENMA sent an email titled "Payment Receipt \$39,000," and a thumbnail photograph, to defendant IRO.

1 Overt Act No. 29: On or about April 7, 2016, an unknown
2 coconspirator fraudulently induced R.B. to send a wire transfer of
3 approximately \$30,000 from her Wells Fargo account in Panama City
4 Beach, Florida, to a Wells Fargo account ending in 7410.

5 Overt Act No. 30: On or about April 12, 2016, defendant
6 ODIONYENMA sent defendant IRO a photograph of the wire transfer
7 request for approximately \$30,000 from the Wells Fargo account of
8 R.B.

9 Overt Act No. 31: On or about April 13, 2016, defendant IRO
10 emailed to defendant AWAK a photograph of the wire transfer request
11 by R.B. for approximately \$18,000 and a photograph of wire transfer
12 information for the wire by R.B. of approximately \$39,000, and asked
13 defendant AWAK to make a receipt "relating to equipment."

14 Overt Act No. 32: On or about April 14, 2016, defendant AWAK
15 emailed to defendant IRO a file containing a purported invoice from
16 "IRVA Auto Sales Equipment Broker LLC" to R.B., which invoice falsely
17 purported to be for two payments in January and February 2019,
18 totaling approximately \$39,000.

19 Victim F.K.

20 Overt Act No. 33: On or about May 30, 2016, an unknown
21 coconspirator fraudulently induced F.K. to send a wire transfer of
22 approximately \$6,824 from a bank account in Japan to a Chase account
23 ending in 1577 of UICC 2, in Los Angeles, California (the "Chase 1577
24 Account").

25 Overt Act No. 34: On or about July 13, 2016, an unknown
26 coconspirator fraudulently induced F.K. to send a wire transfer of
27 approximately \$33,128.26 from a bank account in Japan to a Chase
28

1 account ending in 0655 of UICC 1, in Los Angeles, California (the
2 "Chase 0655 Account").

3 Overt Act No. 35: On or about October 12, 2016, an unknown
4 coconspirator fraudulently induced victim F.K. to travel to Los
5 Angeles to assist in releasing the funds that F.K. sent to the Chase
6 0655 Account.

7 Overt Act No. 36: On or about October 13, 2016, defendant
8 MANSBANGURA took F.K. to a Chase branch in Los Angeles in an attempt
9 to have Chase release the funds that F.K. sent to the Chase 0655
10 Account.

11 Overt Act No. 37: On or about October 13, 2016, defendant
12 MANSBANGURA sent defendant IGBOKWE a photograph of F.K. in Los
13 Angeles, and told defendant IGBOKWE that she had just dropped off
14 F.K.

15 Overt Act No. 38: On an unknown date, an unknown coconspirator
16 fraudulently induced victim F.K. to send him a photograph of the wire
17 transfer request of approximately \$33,128.26 to the Chase 0655
18 Account, which listed F.K.'s name and address, and UICC 1's account
19 number, routing number, and address.

20 Overt Act No. 39: On or about March 24, 2017, defendant
21 ANUNOBI asked defendant IGBOKWE about the funds that F.K. sent
22 through a wire transfer to the Chase 0655 Account, and sent defendant
23 IGBOKWE the photograph of the wire transfer request of approximately
24 \$33,128.26 to the Chase 0655 Account, which listed F.K.'s name and
25 address, and UICC 1's account number, routing number, and address.

26 Overt Act No. 40: On or about March 27, 2017, defendant
27 IGBOKWE sent to defendant MANSBANGURA the photograph of the wire
28 transfer request of approximately \$33,128.26 to the Chase 0655

1 Account, which listed F.K.'s name and address, and UICC 1's account
2 number, routing number, and address, and requested that defendant
3 MANSBANGURA call Chase to inquire about the funds.

4 Victim J.G.

5 Overt Act No. 41: On or about October 26, 2016, an unknown
6 coconspirator fraudulently induced victim J.G. to send a wire
7 transfer of approximately \$30,000 from a bank account at Heritage
8 Bank of Nevada to a US Bank account ending in 2669 of UICC 1, in Los
9 Angeles, California (the "US Bank 2669 Account").

10 Overt Act No. 42: On or about October 27, 2016, defendants
11 IGBOKWE and MANSBANGURA caused a check for approximately \$5,500 to be
12 issued from the US Bank 2669 Account to defendant MANSBANGURA.

13 Overt Act No. 43: On or about October 27, 2016, defendants
14 IGBOKWE and MANSBANGURA caused a check for approximately \$7,580 to be
15 issued from the US Bank 2669 Account to UICC 2.

16 Overt Act No. 44: On or about October 28, 2016, defendants
17 IGBOKWE and MANSBANGURA caused a check for approximately \$8,845 to be
18 issued from the US Bank 2669 Account to UICC 2.

19 Overt Act No. 45: On or about October 31, 2016, defendants
20 IGBOKWE and MANSBANGURA caused a check for approximately \$7,500 to be
21 issued from the US Bank 2669 Account to defendant MANSBANGURA.

22 Victim Company 3

23 Overt Act No. 46: On or about December 19, 2016, an unknown
24 coconspirator fraudulently induced Victim Company 3 to send a wire
25 transfer of approximately \$18,457.13 from its Chase account in
26 Oklahoma to a US Bank account ending in 2982 of UICC 2, in Los
27 Angeles, California ("US Bank 2982 Account").

Overt Act No. 54: On or about March 27, 2017, defendant MANSBANGURA caused a check for approximately \$4,000 to be issued from the Chase 7605 Account, with the memo line indicating that the check was for "Rent."

Overt Act No. 55: On or about April 4, 2017, defendant IGBOKWE provided defendant ONUWA's name and Nigerian bank account number to UICC 4, with the instruction to pay approximately 3,123,000 naira to the account.

Overt Act No. 56: On or about April 6, 2017, defendant IGBOKWE provided defendant ONUWA's name and Nigerian bank account number to defendant IRO, with the request that he pay approximately 1,000,000 naira to the account.

Overt Act No. 57: On or about April 6, 2017, defendant IRO provided defendant ONUWA's name and Nigerian bank account number to UICC 3, with the request that he pay approximately 1,000,000 naira to the account.

Victim Company 4

Overt Act No. 58: On or about March 27, 2017, defendant UMEJESI sent defendant IGBOKWE the account information for a Wells Fargo account ending in 7245 of UICC 9 (the "Wells Fargo 7245 Account"), including the name of UICC 9, the account number, and the routing number.

Overt Act No. 59: On or about March 29, 2017, an unknown coconspirator fraudulently induced Victim Company 4 to send a wire transfer of approximately \$29,679.17 from Banco Bilbao Vizcaya Argentaria, S.A., in Colombia, to the Wells Fargo 7245 Account.

1 Overt Act No. 60: On or about March 29, 2017, defendant
2 IGBOKWE sent defendant UMEJESI a screenshot of a wire transfer
3 confirmation from Victim Company 4 for \$29,679.17.

4 Overt Act No. 61: On or about March 30, 2017, defendant
5 UMEJESI told defendant IGBOKWE that he was going to the bank, told
6 defendant IGBOKWE the username and password for online access to the
7 Wells Fargo 7245 Account, and sent defendant IGBOKWE the name of UICC
8 9.

9 Overt Act No. 62: On or about March 31, 2017, defendants
10 IGBOKWE and UMEJESI caused a check of approximately \$11,160 to be
11 issued in the name of defendant UMEJESI from the Wells Fargo 7245
12 Account.

13 Overt Act No. 63: On or about March 31, 2017, defendants
14 IGBOKWE and UMEJESI caused a check of approximately \$16,520 to be
15 issued in the name of defendant OJIMBA from the Wells Fargo 7245
16 Account.

17 Overt Act No. 64: On or about March 31, 2017, defendant
18 UMEJESI sent defendant IGBOKWE a photograph of a deposit slip showing
19 a deposit of approximately \$11,160 to a Chase account ending in 7290,
20 in Inglewood, California.

21 Overt Act No. 65: On or about March 31, 2017, defendant
22 UMEJESI sent defendant IGBOKWE a photograph of a deposit slip showing
23 the deposit of a check issued by UICC 9 to defendant OJIMBA in the
24 amount of approximately \$16,520 to a Chase account ending 1767, in
25 Inglewood, California.

26 Overt Act No. 66: On or about April 1, 2017, defendant IGBOKWE
27 told defendant UMEJESI that they were entitled to 40 percent of the
28

1 amount received from Victim Company 4, which was approximately
2 \$11,840.

3 Victim Company 5

4 Overt Act No. 67: On or about February 17, 2017, defendant IRO
5 told defendant IGBOKWE to have defendant MANSBANGURA take UICC 1 to a
6 bank to open a bank account in the name of Victim Company 5.

7 Overt Act No. 68: On or about February 17, 2017, defendant
8 IGBOKWE sent defendant MANSBANGURA the message from defendant IRO
9 about taking UICC 1 to a bank to open a bank account in the name of
10 Victim Company 5.

11 Overt Act No. 69: On or about February 22, 2017, defendant
12 MANSBANGURA caused UICC 1 to open a bank account at Chase ending in
13 5027 in a name similar to that of Victim Company 5 (the "Chase 5027
14 Account").

15 Overt Act No. 70: On or about March 20, 2017, defendant
16 IGBOKWE sent to defendant IRO the account information for the Chase
17 5027 Account, including the account number and the routing number.

18 Overt Act No. 71: On or about April 4, 2017, Wells Fargo
19 received a letter purporting to be from Victim Company 5, which
20 included a notarized letter and forged signature of the Chief
21 Executive Officer of Victim Company 5, requesting the closure of
22 Victim Company 5's Wells Fargo account and the transfer of the
23 current balance – which at the time was approximately \$17,300,844.58
24 – to the Chase 5027 Account.

25 Overt Act No. 72: On or about June 5, 2017, Wells Fargo
26 received a letter by U.S. Mail purporting to be from Victim Company
27 5, requesting the closure of Victim Company 5's Wells Fargo account
28

1 and transfer of the current balance – which at the time was
2 approximately \$12,760,922.93 – to the Chase 5027 Account.

3 Victim A.V.

4 Overt Act No. 73: On or about April 10, 2017, defendants
5 IGBOKWE and CHILAKA discussed a payment from A.V. anticipated to
6 arrive in a Wells Fargo account ending in 1147 of UICC 26, in Los
7 Angeles, California (the "Wells Fargo 1147 Account"), including
8 discussion of the name of UICC 26, the account number, and the
9 routing number.

10 Overt Act No. 74: On or about April 11, 2017, an unknown
11 coconspirator fraudulently induced A.V. to request a wire transfer of
12 approximately \$8,035 from her Capital One account in Maryland to the
13 Wells Fargo 1147 Account.

14 Overt Act No. 75: On or about April 11, 2017, defendant
15 CHILAKA sent defendant IGBOKWE a copy of a wire transfer request
16 submitted by A.V. on April 11, 2017, requesting transfer of
17 approximately \$8,035 from her Capital One account in Maryland to the
18 Wells Fargo 1147 Account.

19 Overt Act No. 76: On or about April 17, 2017, after defendant
20 IGBOKWE sent defendant CHILAKA the account information for a BOA
21 account ending in 3037 of UICC 26, defendant CHILAKA asked for a bank
22 account that did not use a Nigerian name.

23 Overt Act No. 77: On or about April 17, 2017, defendant
24 IGBOKWE sent defendant CHILAKA the account information for the Chase
25 5027 Account, including the name of UICC 1, the account number, and
26 the routing number.

27 Overt Act No. 78: On or about April 27, 2017, an unknown
28 coconspirator fraudulently induced A.V. to send a wire transfer of

1 approximately \$2,700 from her Capital One account in Maryland to the
2 Chase 5027 Account.

3 Overt Act No. 79: On or about April 27, 2017, defendant
4 MANSBANGURA sent defendant IGBOKWE photographs of a Chase banking
5 application on a phone showing that an approximately \$2,700 wire
6 transfer from A.V. was pending in the Chase 5027 Account.

7 Overt Act No. 80: On or about April 27, 2017, defendant
8 IGBOKWE sent defendant CHILAKA photographs of a Chase banking
9 application on a phone showing that an approximately \$2,700 wire
10 transfer from A.V. was pending in the Chase 5027 Account.

11 Overt Act No. 81: On or about May 1, 2017, an unknown
12 coconspirator fraudulently induced A.V. to send a wire transfer of
13 approximately \$3,360 from her Capital One account in Maryland to the
14 Chase 5027 Account.

15 Overt Act No. 82: On or about May 1, 2017, defendant
16 MANSBANGURA sent defendant IGBOKWE a photograph of a Chase banking
17 application on a phone showing that an approximately \$3,360 wire
18 transfer from A.V. was pending in the Chase 5027 Account.

19 Overt Act No. 83: On or about April 27, 2017, defendant
20 IGBOKWE sent defendant CHILAKA photographs of a Chase banking
21 application on a phone showing that an approximately \$3,360 wire from
22 A.V. was pending in the Chase 5027 Account.

23 Overt Act No. 84: On or about May 8, 2017, defendant
24 MANSBANGURA told defendant IGBOKWE not use the Chase 5027 Account to
25 receive transactions from Capital One because Chase was scrutinizing
26 transactions from Capital One for fraud.

27 Overt Act No. 85: On or about June 2, 2017, defendant CHILAKA
28 sent defendant IGBOKWE a voicemail from A.V. for a purported "Mr.

Davis," in which A.V. discussed having spoken to her Chase banker about the release of the \$3,360 wire.

Overt Act No. 86: On or about June 2, 2017, defendant IGBOKWE sent defendant CHILAKA an audio recording of defendant MANSBANGURA calling Chase while posing as UICC 1, and asking about the status of the \$3,360 wire.

Victims Je.F. and Jo.F.

Overt Act No. 87: On or about April 17, 2017, an unknown coconspirator fraudulently induced Je.F. to send a wire transfer of approximately \$135,800 from the BMO Harris Bank account of Je.F. and Jo.F. in Illinois to a Chase account ending in 6217 of UICC 24, in Hawthorne, California ("Chase 6217 Account").

Overt Act No. 88: On or about April 18, 2017, defendant IRO sent defendant EKECHUKWU the account information for the Chase 6217 Account, including the account number and the routing number, and told him "Check this. Something is inside[.]"

Overt Act No. 89: On or about April 19 and 20, 2017, defendant IRO discussed with defendant ANOZIE information from defendant AZUBUIKE related to defrauding Je.F. and Jo.F.

Overt Act No. 90: On or about April 19, 2017, defendant IRO complained to defendant EKECHUKWU that, after a call by Chase to UICC 24, UICC 24 stated that he wanted to send the \$135,800 back.

Victim Company 6

Overt Act No. 91: On or about April 10, 2017, defendant NNAMDI asked defendant IRO to open a bank account in the name of a specific Chinese company ("Chinese Company 1") with which Victim Company 6 had a business relationship.

1 Overt Act No. 92: On or about April 10, 2017, defendant IRO
2 asked defendant CATHEY to open a bank account in the name of Chinese
3 Company 1.

4 Overt Act No. 93: On or about April 12, 2017, defendant CATHEY
5 sent defendant IRO the account information for a PNC Bank account
6 ending in 7988, opened by UICC 10 in the name of Chinese Company 1,
7 in Atlanta, Georgia (the "PNC Bank 7988 Account").

8 Overt Act No. 94: On or about April 17, 2017, after defendant
9 NNAMDI told defendant IRO that he had emailed defendant IRO a copy of
10 the "invoice" sent to Victim Company 6, defendant IRO told defendant
11 CATHEY that Victim Company 6 was expected to pay \$900,000 to the PNC
12 Bank 7988 Account.

13 Overt Act No. 95: On or about April 18, 2017, an unknown
14 coconspirator fraudulently induced Victim Company 6 to send a wire
15 transfer of approximately \$900,000 from its Commerce State Bank
16 account in Wisconsin to the PNC Bank 7988 Account.

17 Overt Act No. 96: On or about April 18, 2017, defendant IRO
18 sent defendant CATHEY a screenshot of a wire confirmation page
19 containing details for the \$900,000 wire ordered by Victim Company 6
20 to the PNC Bank 7988 Account, and wrote, "Done [¶] Hahahaha."

21 Overt Act No. 97: On or about April 19, 2017, defendant CATHEY
22 told defendant IRO how defendant CATHEY had flown to Atlanta to
23 oversee withdrawal of the funds fraudulently obtained from Victim
24 Company 6.

25 Overt Act No. 98: On or about April 24, 2017, defendant CATHEY
26 sent defendant IRO account information for a Chase account ending in
27 5899, opened in the name of Chinese Company 1 in Los Angeles,
28

1 California ("Chase 5899 Account"), which defendant IRO said he would
2 keep for use later.

3 Victim Company 7

4 Overt Act No. 99: On or about April 21, 2017, an unknown
5 coconspirator fraudulently induced Victim Company 7 to send a wire
6 transfer of approximately \$23,789, intended for Victim Company 8,
7 from Victim Company 7's BOA account in North Carolina to the Chase
8 checking account ending in 7866 of UICC 25, in Carson, California
9 (the "Chase 7866 Account").

10 Overt Act No. 100: On or about April 21, 2017, defendant IRO
11 caused approximately \$2,700 to be transferred from the Chase 7866
12 Account to the Chase savings account ending in 9927 of UICC 25, in
13 Carson, California (the "Chase 9927 Account").

14 Overt Act No. 101: On or about April 24, 2017, defendant IRO
15 caused a wire transfer of approximately \$18,598 to be sent from the
16 Chase 7866 Account to a SunTrust account of "B&B Motors of Tampa Bay
17 Inc.," with the wire notes saying "This payment is for car purchase
18 of Mr. Brown's; Payment For Mr Brown's Car Buy."

19 Overt Act No. 102: On or about April 24, 2017, defendant IRO
20 caused approximately \$500 to be withdrawn from the Chase 7866 Account
21 as cash through an ATM.

22 Overt Act No. 103: On or about April 25, 2017, defendant IRO
23 caused a wire transfer of approximately \$1450 to be sent from the
24 Chase 7866 Account to a U.S. Bank account ending in 0953.

25 Overt Act No. 104: On or about April 26, 2017, defendant IRO
26 sent defendant ANOZIE photographs of a phone showing a Chase banking
27 application containing information related to the wire of
28 approximately \$23,789 from Victim Company 7.

1 Victim D.J.

2 Overt Act No. 105: On or about January 20, 2017, defendants
3 IGBOKWE and MANSBANGURA assisted defendant P. DURU in filing an
4 application for a Fictitious Business Name Statement with the Los
5 Angeles County Registrar-Recorder/County Clerk's Office in the name
6 "PD Enterprise."

7 Overt Act No. 106: On or about March 14, 2017, defendant
8 P. DURU sent defendant IGBOKWE account information for a Wells Fargo
9 account ending in 4859 of defendant P. DURU, dba "PD Enterprise," in
10 Sacramento, California (the "BOA 4859 Account").

11 Overt Act No. 107: On or about April 7, 2017, in response to
12 defendant IGBOKWE's request that defendant P. DURU open a bank
13 account at Wells Fargo, defendant P. DURU sent defendant IGBOKWE
14 account information for a Wells Fargo account ending in 4899 of
15 defendant P. DURU, dba "PD Enterprise," in San Francisco, California
16 (the "Wells Fargo 4899 Account").

17 Overt Act No. 108: On or about April 24, 2017, defendant
18 IGBOKWE sent defendant ODIONYENMA the account information for the
19 Wells Fargo 4899 Account, including the account number and the
20 routing number.

21 Overt Act No. 109: On or about May 3, 2017, defendant
22 ODIONYENMA asked defendant IGBOKWE to confirm that he could use the
23 Wells Fargo 4899 Account to receive a romance scam payment of
24 approximately \$25,000.

25 Overt Act No. 110: On or about May 5, 2017, an unknown
26 coconspirator fraudulently induced D.J. to purchase a money order of
27 approximately \$25,600 from United Southwest Bank in Minnesota and
28 deposit it into the Wells Fargo 4899 Account.

Overt Act No. 111: On or about May 5, 2017, defendant ODIIONYENMA sent defendant IGBOKWE a photograph of a check deposit receipt showing that approximately \$25,600 had been deposited into the Wells Fargo 4899 Account.

Overt Act No. 112: On or about May 5 and 6, 2017, defendants ODIONYENMA and IGBOKWE discussed the exchange rate that defendant IGBOKWE would provide, with defendant ODIONYENMA ultimately providing a Nigerian bank account where defendant IGBOKWE was to deposit 7,272,000 naira.

Overt Act No. 113: On or about May 11, 2017, defendant P. DURU complained to defendant IGBOKWE that receiving 10 percent of the fraudulently-obtained funds – rather than his usual 20 percent for romance scam laundering or 40 percent for BEC fraud laundering – was insufficient given the “risk” involved, and defendant IGBOKWE responded, “Lol.”

Victim L.B.

Overt Act No. 114: On or about May 1, 2017, defendant IGBOKWE sent defendant IRO the account information, including the account number and the routing number, for a BOA account ending in 2660, in Los Angeles, California (the "BOA 2660 Account") opened in defendant IGBOKWE's name.

Overt Act No. 115: On or about May 3, 2017, defendant IRO provided defendant AWAK with defendant IGBOKWE's BOA 2660 Account to receive an approximately \$3,000 romance scam payment.

Overt Act No. 116: On or about May 4, 2017, defendant AWAK sent defendant IRO a photograph of a wire transfer request from L.B.'s Wells Fargo account in Alabama to the BOA 2660 Account, but the wire transfer request spelled defendant IGBOKWE's name incorrectly.

Overt Act No. 117: On or about May 9, 2017, after defendant IRO sent defendant AWAK the correct account-holder name on the BOA 2660 Account, defendant AWAK told defendant IRO that L.B. was at the bank re-sending a wire transfer.

Overt Act No. 118: On or about May 9, 2017, an unknown coconspirator fraudulently induced L.B. to send a wire transfer of approximately \$3,000 from her Wells Fargo account to the BOA 2660 Account.

Overt Act No. 119: On or about May 15, 2017, defendant IRO instructed UICC 3 to pay 742,500 naira from his Nigerian bank account to defendant AWAK's Nigerian bank account.

Overt Act No. 120: On or about June 7, 2017, defendant IGBOKWE used approximately \$1,225 from the BOA 2660 Account to pay the U.S. Customs and Immigration Service in connection with his application for lawful permanent residence.

Victim Company 9

Overt Act No. 121: On or about April 24, 2017, defendant IGBOKWE sent defendant UZOKA the account information for a BOA account ending in 1004 of UICC 11, in Northridge, California (the "BOA 1004 Account"), including the name of UICC 11, the account number, and the routing number.

Overt Act No. 122: On or about April 28, 2017, in response to defendant UZOKA's inquiry about whether the BOA 1004 Account was "still good," defendant IGBOKWE responded with a "thumbs up" pictograph.

Overt Act No. 123: On or about May 3, 2017, defendant UZOKA sent defendant IGBOKWE an email that had been sent by an employee of Victim Company 9 to a hacked email account of a Caribbean company

1 with which Victim Company 9 was doing business, and defendant UZOKA
2 also told defendant IGBOKWE that the fraudulent transaction would be
3 approximately \$220,000.

4 Overt Act No. 124: On or about May 10, 2017, an unknown
5 coconspirator fraudulently induced Victim Company 9 to send a wire
6 transfer of approximately \$220,462.68 from its account at First
7 Caribbean International Bank to the BOA 1004 Account.

8 Overt Act No. 125: On or about May 10, 2017, defendant UMEJESI
9 sent defendant IGBOKWE a screenshot of a banking application
10 indicating that the fraudulent wire from Victim Company 9 had been
11 deposited into the BOA 1004 Account, which defendant IGBOKWE then
12 sent to defendant UZOKA.

13 Overt Act No. 126: On or about May 11, 2017, defendant IKOGHO
14 sent defendant IRO the account information for a BOA account ending
15 in 5283 (the "BOA 5283 Account"), including the account number and
16 the routing number.

17 Overt Act No. 127: On or about May 11, 2017, defendant OGUNGBE
18 sent defendant IRO the account information for a BOA account ending
19 in 9405 (the "BOA 9405 Account"), including the account number and
20 the routing number.

21 Overt Act No. 128: On or about May 11, 2017, defendant IGBOKWE
22 sent defendant UMEJESI the account information for the BOA 5283
23 Account and the BOA 9405 Account, including the account numbers and
24 the routing numbers, which information defendant IGBOKWE had received
25 from defendant IRO.

26 Overt Act No. 129: On or about May 11, 2017, defendant UMEJESI
27 caused a transfer of approximately \$60,000 to be made from the BOA
28 1004 Account to the BOA 5283 Account, and sent defendant IGBOKWE a

1 photograph of a deposit slip reflecting the transfer, which defendant
2 IGBOKWE, in turn, sent to defendant IRO.

3 Overt Act No. 130: On or about May 12, 2017, defendant UMEJESI
4 caused a transfer of approximately \$75,500 to be made from the BOA
5 1004 Account to the BOA 9405 Account, and sent defendant IGBOKWE a
6 photograph of a deposit slip reflecting the transfer, which defendant
7 IGBOKWE, in turn, sent to defendant IRO.

8 Overt Act No. 131: On or about May 13, 2017, defendant IGBOKWE
9 asked defendant IRO to make payments of approximately 21,300,000
10 naira and approximately 26,802,500 naira to the Nigerian bank account
11 of UICC 5.

12 Overt Act No. 132: On or about May 13, 2017, defendant IRO
13 asked defendant IKOGHO to pay approximately 21,300,000 naira from his
14 Nigerian bank account to the Nigerian bank account of UICC 5.

15 Overt Act No. 133: On or about May 15, 2017, defendant UMEJESI
16 caused a cashier's check of approximately \$21,000, addressed to
17 defendant UMEJESI, to be purchased from the BOA 1004 Account.

18 Overt Act No. 134: On or about May 15, 2017, defendant UMEJESI
19 caused a cashier's check of approximately \$9,500, addressed to
20 defendant IGBOKWE, to be purchased from the BOA 1004 Account.

21 Overt Act No. 135: On or about May 15, 2015, defendant UMEJESI
22 caused a transfer of approximately \$30,000 to be made from the BOA
23 1004 Account to the BOA 9405 Account.

24 Overt Act No. 136: On or about May 15, 2017, defendant IGBOKWE
25 asked UICC 5 to transfer approximately 7,750,000 naira from her
26 Nigerian bank account to the Nigerian bank account of defendant
27 UZOKA.

Overt Act No. 143: On or about May 11, 2017, an unknown coconspirator fraudulently induced the Victim Law Firm to send a wire transfer of approximately \$83,140.98 from its account at SunTrust in North Carolina to the Chase 5899 Account.

Overt Act No. 144: On or about May 11, 2017, defendant OCHIAGHA told defendant IGBOKWE that a fraudulent payment would arrive in the Chase 5899 Account.

Overt Act No. 145: On or about May 11, 2017, after defendant IRO told defendant CATHEY that a fraudulent payment would arrive in the Chase 5899 Account, defendant CATHEY reported to defendant IRO that \$83,000 had arrived.

Overt Act No. 146: On or about May 11, 2017, defendant IRO reported to defendant IGBOKWE that \$83,000 had arrived in the Chase 5899 Account.

Overt Act No. 147: On or about May 12 and 13, 2017, defendants IRO and CATHEY expressed concern to each other that the wire of approximately \$83,140.98 that had arrived was from a U.S. law firm, and discussed requesting that Chase return the funds in order to avoid further scrutiny for the transaction.

Victim D.V.

Overt Act No. 148: On or about May 13, 2017, an unknown coconspirator fraudulently induced D.V. to send approximately \$500 by Western Union to the account of UICC 1, in Los Angeles, California.

Overt Act No. 149: On or about May 14, 2017, defendant IGBOKWE sent defendant MANSBANGURA the information needed to receive the funds that D.V. sent by Western Union on May 13, 2015, including D.V.'s name, D.V.'s address, a unique tracking number needed to receive the money, and UICC 1's name.

1 Overt Act No. 150: On or about May 15, 2017, an unknown
2 coconspirator fraudulently induced D.V. to send approximately \$500 by
3 Western Union to the account of UICC 1, in Los Angeles, California.

4 Overt Act No. 151: On or about May 15, 2017, defendant IGBOKWE
5 sent defendant MANSBANGURA the information needed to receive the
6 funds that D.V. sent by Western Union on May 15, 2015, including
7 D.V.'s name, and D.V.'s address, and told defendant MANSBANGURA that
8 the funds had been sent to UICC 1's account.

9 Overt Act No. 152: On or about May 15, 2017, defendant
10 MANSBANGURA caused \$500 sent by D.V. to UICC 1 through Western Union
11 to be withdrawn in Los Angeles, California.

12 Overt Act No. 153: On or about May 15, 2017, defendant
13 MANSBANGURA caused \$500 sent by D.V. to UICC 1 through Western Union
14 to be withdrawn in Los Angeles, California.

15 Victim Company 10

16 Overt Act No. 154: On or about May 11, 2017, defendant OCHIAGHA
17 requested that defendant IGBOKWE open a bank account in the name of a
18 U.S. company based in Pennsylvania (the "Pennsylvania Company") at a
19 bank other than First National Bank, where defendant OCHIAGHA said
20 the Pennsylvania Company held its legitimate bank account.

21 Overt Act No. 155: On or about May 12, 2017, after defendant
22 IGBOKWE asked defendant IRO to open a bank account in the name of the
23 Pennsylvania Company, defendant IRO asked defendant CATHEY to open a
24 bank account in the name of the Pennsylvania Company.

25 Overt Act No. 156: On or about May 15, 2017, defendant CATHEY
26 provided account information to defendant IRO for a Chase account
27 ending in 7262, opened in the name of the Pennsylvania Company by
28

1 UICC 12, in Inglewood, California ("Chase 7262 Account"), including
2 the account number and the routing number.

3 Overt Act No. 157: On or about May 15, 2017, defendant IRO
4 provided account information to defendant IGBOKWE for the Chase 7262
5 Account, including the account number and the routing number, who
6 then provided the account information to defendant OCHIAGHA.

7 Overt Act No. 158: On or about May 17, 2017, an unknown
8 coconspirator fraudulently induced Victim Company 10 to send a wire
9 transfer of approximately \$301,201.20 from its account at China
10 Merchants Bank in China to the Chase 7262 Account.

11 Overt Act No. 159: On or about May 17, 2017, defendant IGBOKWE
12 sent defendant IRO a screenshot showing a wire confirmation page for
13 the wire from Victim Company 10 to the Chase 7262 Account.

14 Overt Act No. 160: On or about May 17, 2017, defendant IRO
15 instructed defendant CATHEY to begin to "service" the Chase 7262
16 Account, in anticipation of withdrawing the fraudulently-obtained
17 funds.

18 Overt Act No. 161: On or about May 19, 2017, defendants IRO and
19 CATHEY discussed that Victim Company 10 had found out about the BEC
20 fraud scheme.

21 Victim T.P.

22 Overt Act No. 162: On or about May 2, 2017, after defendant IRO
23 asked defendant CATHEY to open a bank account in the name of a
24 specific Chinese company ("Chinese Company 4"), defendant CATHEY sent
25 defendant IRO the account information for a Chase account ending in
26 7522, in Los Angeles, California (the "Chase 7522 Account"),
27 including the account number and routing number, and defendant IRO
28 sent that information to defendant NNAMDI.

1 Overt Act No. 163: On or about June 5, 2017, defendant NNAMDI
2 sent defendant IRO an email from T.P., which indicated that T.P. had
3 been fraudulently induced to make a payment.

4 Overt Act No. 164: On or about June 5, 2017, an unknown
5 coconspirator fraudulently-induced T.P. to send a wire transfer of
6 approximately \$64,554 from an HSBC account in Hong Kong to the Chase
7 7522 Account.

8 Overt Act No. 165: On or about June 5, 2017, defendant IRO told
9 defendant NNAMDI that the exchange rate that defendant IRO could
10 provide was 60 to 100 naira below market rates because his money
11 exchangers had to "clean" the funds which carried "risk."

12 Overt Act No. 166: On or about June 6, 2017, defendants IRO and
13 CATHEY caused approximately \$8,500 to be withdrawn as cash from the
14 Chase 7522 Account.

15 Overt Act No. 167: On or about June 7, 2017, defendants IRO and
16 CATHEY caused approximately \$7,100 to be withdrawn as cash from the
17 Chase 7522 Account.

18 Overt Act No. 168: On or about June 7, 2017, defendants IRO and
19 CATHEY caused an approximately \$47,000 wire transfer to be sent from
20 the Chase 7522 Account to the Citibank account of a company in Hong
21 Kong.

22 Overt Act No. 169: On or about June 7, 2017, defendant NNAMDI
23 sent defendant IRO account information for a Nigerian bank account to
24 which defendant IRO was to have his "exchanger" provide payment.

25 Overt Act No. 170: On or about June 9, 2017, defendant IRO sent
26 defendant OGUNGBE the Nigerian bank account information that
27 defendant NNAMDI had provided to him, with the instruction to
28 "[t]ransfer 7,965,000" naira and "[c]ount it as 27k usd."

1 Overt Act No. 171: On or about June 10, 2017, defendant OGUNGBE
2 confirmed that he had paid 7,965,000 naira to the Nigerian bank
3 account that defendant NNAMDI had provided to defendant IRO.

4 Victim Company 11

5 Overt Act No. 172: On or about May 25, 2017, defendant XPLOA G
6 asked defendant IRO to open a bank account in the name of a U.S.
7 company ("U.S. Company 1") in anticipation of an approximately
8 \$300,000 BEC fraud payment.

9 Overt Act No. 173: On or about May 26, 2017, after defendant
10 IRO asked defendant CATHEY to open a bank account in the name of U.S.
11 Company 1, defendant CATHEY caused UICC 12 to file a Fictitious
12 Business Name Statement in the name of U.S. Company 1 with the Los
13 Angeles County Registrar-Recorder/County Clerk's Office.

14 Overt Act No. 174: On or about May 26, 2017, after defendant
15 IRO asked defendant CATHEY to open a bank account in the name of U.S.
16 Company 1, defendant CATHEY sent defendant IRO the account
17 information for a BOA account ending in 4180, opened by UICC 12 in
18 the name of U.S. Company 1, in Inglewood, California (the "BOA 4180
19 Account"), including the account number and the routing number.

20 Overt Act No. 175: On or about May 26, 2017, defendant IRO sent
21 defendant XPLOA G the account information for the BOA 4180 Account,
22 including the account number and the routing number.

23 Overt Act No. 176: On or about June 13, 2017, an unknown
24 coconspirator fraudulently induced Victim Company 11 to send a wire
25 transfer of approximately \$297,617.11 from its account at Arab Bank
26 PLC in Lebanon to the BOA 4180 Account.

1 Overt Act No. 177: On or about June 13, 2017, defendant
2 XPLORA G told defendant IRO that Victim Company 11 had paid \$297,000
3 into the BOA 4180 Account.

4 Overt Act No. 178: On or about June 13, 2017, after defendant
5 CATHEY told defendant IRO that BOA had closed the BOA 4180 Account,
6 defendant IRO asked defendant CATHEY to reopen the account.

7 Overt Act No. 179: On or about June 14, 2017, defendant IRO
8 asked defendant UMEJESI to open a bank account at Chase or Wells
9 Fargo, but not BOA, in the name of U.S. Company 1.

10 Overt Act No. 180: On or about June 15, 2017, defendant UMEJESI
11 caused UICC 13 to file a Fictitious Business Name Statement in the
12 name of U.S. Company 1 with the Los Angeles County Registrar-
13 Recorder/County Clerk's Office.

14 Overt Act No. 181: On or about June 15, 2017, defendant UMEJESI
15 sent defendant IRO the account information for a Wells Fargo account
16 ending in 7984, opened by UICC 13, in Inglewood, California (the
17 "Wells Fargo 7984 Account"), including the account number and the
18 routing number.

19 Overt Act No. 182: On or about June 16, 2017, an unknown
20 coconspirator fraudulently induced Victim Company 11 to send a wire
21 transfer of approximately \$297,617.11 from its account at Arab Bank
22 PLC in Lebanon to the Wells Fargo 7984 Account.

23 Overt Act No. 183: On or about June 22, 2017, after defendant
24 IRO asked defendant MADEKWE if he was able to launder the funds
25 fraudulently obtained from Victim Company 11 and they discussed the
26 exchange rate that defendant MADEKWE would provide, defendant MADEKWE
27 reported that he was unable to launder the funds because his Wells
28 Fargo account had been closed.

Overt Act No. 184: On or about June 23, 2017, with defendant MADEKWE unable to launder the funds, defendant IRO told defendant UMEJESI to transfer \$84,755 from the Wells Fargo 7984 Account to the Wells Fargo account ending in 8463 of R.L., which account information, including R.L.'s name and the account number, had been provided to defendant IRO by defendant IKOGHO.

Overt Act No. 185: On or about June 25, 2017, defendant IRO caused defendant EROHA to file a Fictitious Business Name Statement with the Los Angeles County Registrar-Recorder/County Clerk's Office, in a name similar to that of U.S. Company 1.

Overt Act No. 186: On or about June 25, 2017, defendant IRO sent XPLORA G the account information for a BOA account ending in 3563 opened by defendant EROHA with a business name similar to that of U.S. Company 1, in Inglewood, California (the "BOA 3563 Account").

Victim B.P.

Overt Act No. 187: On or about June 23, 2017, defendant AGUNWA told defendant IGBOKWE that a coconspirator would use the Chase 7605 Account to receive an approximately \$750 fraud payment.

Overt Act No. 188: On or about June 23, 2017, an unknown coconspirator fraudulently induced B.P. to send a wire transfer of approximately \$750 from her First Hawaiian Bank account in Hawaii to the Chase 7605 Account.

Overt Act No. 189: On or about June 27, 2017, defendant IGBOKWE instructed UICC 4 to make payments of 26,000 naira to defendant AGUNWA's Nigerian bank account and 183,000 naira to the Nigerian bank account of AGUNWA's coconspirator.

Overt Act No. 190: On or about June 27, 2017, an unknown coconspirator fraudulently induced B.P. to send a wire transfer of

1 approximately \$1,500 from her First Hawaiian Bank account in Hawaii
2 to the Chase 7605 Account.

3 Overt Act No. 191: On or about June 29, 2017, defendant
4 MANSBANGURA checked the Chase 7605 Account for a payment from B.P.,
5 at the request of defendant IGBOKWE.

6 Overt Act No. 192: On or about July 5, 2017, defendant IGBOKWE
7 instructed UICC 4 to make payments of 50,000 naira to defendant
8 AGUNWA's Nigerian bank account and 367,000 naira to the Nigerian bank
9 account of AGUNWA's coconspirator.

10 Overt Act No. 193: On or about July 13, 2017, an unknown
11 coconspirator fraudulently induced B.P. to send a wire transfer of
12 approximately \$2,550 from her First Hawaiian Bank account in Hawaii
13 to the Chase 7605 Account.

14 Victim Solicitor Firm

15 Overt Act No. 194: On or about June 20, 2017, defendant
16 OCHIAGHA asked defendant IGBOKWE for a bank account that could be
17 used to receive an approximately \$200,000 BEC fraud payment from the
18 Victim Solicitor Firm.

19 Overt Act No. 195: On or about June 21, 2017, in response to
20 defendant IGBOKWE's request to open a bank account that could receive
21 an approximately \$200,000 BEC fraud payment, defendant IRO sent
22 defendant IGBOKWE the account information for a Chase account ending
23 in 7633 of UICC 14, in Culver City, California ("Chase 7633
24 Account"), including the account number and the routing number.

25 Overt Act No. 196: On or about June 22, 2017, an unknown
26 coconspirator fraudulently induced the Victim Solicitor Firm to send
27 a wire transfer of approximately \$199,960 from its account at Lloyds
28 Bank in the United Kingdom to the Chase 7633 Account.

Overt Act No. 197: On June 22, 2017, after defendant CATHEY told defendant IRO that a payment of approximately \$199,000 arrived in the Chase 7633 Account and asked about the cut he would receive, defendant IRO told him "[y]ou guys get 40k" and instructed him to "keep the acc[ount] good" by servicing it.

Overt Act No. 198: On or about June 23, 2017, defendants IRO and CATHEY caused a sum of approximately \$43,750 to be transferred from the Chase 7633 Account to a Chase account ending in 6781 of UICC 15 in Los Angeles, California ("Chase 6781 Account"), which was provided to defendant IRO by defendant IKOGHO.

Overt Act No. 199: On or about June 24, 2017, defendants IRO and CATHEY caused the purchase of a cashier's check of approximately \$9,150 from the Chase 7633 Account.

Victim Company 12

Overt Act No. 200: On or about May 25, 2017, following a request by defendant XPLORA G for a bank account in the name of a specific South Korean company (the "Korean Company"), defendant IRO asked defendant CATHEY to open a bank account in the name of the Korean Company.

Overt Act No. 201: On or about May 30, 2017, defendant CATHEY sent defendant IRO the account information for a Chase account ending in 6679 that had been opened in the name of the Korean Company, in Inglewood, California ("Chase 6679 Account"), including the account number and the routing number, which information defendant IRO provided to defendant XPLORE G.

Overt Act No. 202: On or about June 28, 2017, an unknown coconspirator attempted to fraudulently induce Victim Company 12 to

1 send a wire transfer of approximately \$2,502,585.30 from its account
2 in Texas to the Chase 6679 Account.

3 Overt Act No. 203: On or about June 30, 2017, defendant
4 XPLOA G told defendant IRO that the payment would be from Victim
5 Company 12 to the Korean Company, and defendant IRO provided that
6 information to defendant CATHEY.

7 Victim D.A.

8 Overt Act No. 204: On or about June 16, 2017, an unknown
9 coconspirator fraudulently induced D.A. to send a wire transfer of
10 approximately \$500 from his Capital City Bank account in Kansas to
11 the Chase 5027 Account.

12 Overt Act No. 205: On or about June 16, 2017, defendant NWANGWU
13 sent defendant IGBOKWE a wire transfer confirmation page for an
14 approximately \$500 wire from D.A. to the Chase 5027 Account, which
15 listed D.A.'s name, address, and social security number.

16 Overt Act No. 206: On or about June 16, 2017, defendant IGBOKWE
17 sent to defendant MANSBANGURA the wire confirmation page for the
18 approximately \$500 wire from D.A. to the Chase 5027 Account, which
19 listed D.A.'s name, address, and social security number.

20 Victim M.G.

21 Overt Act No. 207: On or about July 3, 2017, in response to
22 defendant MACWILLIAM CHUKWUOCHA's request for a bank account that
23 could receive an approximately \$11,000 romance scam payment from
24 Mexico, defendant IGBOKWE provided defendant MACWILLIAM CHUKWUOCHA
25 with the account information for the BOA 3563 Account, including the
26 account number and the routing number.

27 Overt Act No. 208: On or about July 6, 2017, an unknown
28 coconspirator fraudulently induced M.G. to send a wire transfer of

1 approximately \$11,000 from her HSBC account in Mexico to defendant
2 EROHA's BOA 3563 Account.

3 Overt Act No. 209: On or about July 6, 2017, defendant
4 MACWILLIAM CHUKWUOCHA told defendant IGBOKWE that the "client" had
5 paid approximately \$11,000, and sent a photograph of a computer
6 screen showing a wire-transfer order.

7 Overt Act No. 210: On or about July 10, 2017, defendant IGBOKWE
8 caused defendant EROHA to send a wire transfer of approximately
9 \$6,000 from the BOA 3563 Account to a Wells Fargo account ending in
10 5736 of defendant MACWILLIAM CHUKWUOCHA, in Orlando, Florida (the
11 "Wells Fargo 5736 Account").

12 Overt Act No. 211: On or about July 11, 2017, defendant IGBOKWE
13 caused to be sent a wire transfer of approximately \$2,800 from
14 defendant EROHA's BOA 3563 Account to the Wells Fargo 5736 Account.

15 Overt Act No. 212: On or about July 17, 2017, an unknown
16 coconspirator fraudulently induced M.G. to send a wire transfer of
17 approximately \$5,000 from her HSBC account in Mexico to defendant
18 EROHA's BOA 3563 Account.

19 Overt Act No. 213: On or about July 17, 2017, defendants
20 IGBOKWE and EROHA caused approximately \$5,000 to be withdrawn as cash
21 from the BOA 3563 Account and approximately \$4,150 to be redeposited
22 into the Wells Fargo 5736 Account.

23 Overt Act No. 214: On or about December 15, 2017, an unknown
24 coconspirator fraudulently induced M.G. to send a wire transfer of
25 approximately \$5,500 from her HSBC account in Mexico to a BOA account
26 ending in 3349 of defendant AJAEZE in Harbor City, California (the
27 "BOA 3349 Account").

Overt Act No. 215: On or about December 22, 2017, an unknown coconspirator fraudulently induced M.G. to send a wire transfer of approximately \$2,000 from her HSBC account in Mexico to the BOA 3349 Account.

Overt Act No. 216: On or about May 2, 2018, an unknown coconspirator fraudulently induced M.G. to send a wire transfer of approximately \$11,000 from her HSBC account in Mexico to a US Bank account ending in 2910 of defendant AJAEZE in Inglewood, California.

Victim Company 13

Overt Act No. 217: On or about July 9, 2017, defendant SAM MAL asked defendant IRO to open a bank account in the name of a Chinese company ("Chinese Company 2").

Overt Act No. 218: On or about July 11, 2017, defendant IRO asked defendant UMEJESI to open a bank account at BOA or Citibank in the name of Chinese Company 2.

Overt Act No. 219: On or about July 11, 2017, following a request by defendant IRO to open a bank account at Chase in the name of Chinese Company 2, defendant CATHEY sent defendant IRO account information for a Chase account ending in 5092 of UICC 16 opened in the name of Chinese Company 2, in Hawthorne, California (the "Chase 5092 Account").

Overt Act No. 220: On or about July 12, 2017, following a request by defendant IRO to open a bank account at Citibank or Wells Fargo in the name of Chinese Company 2, defendant EKECHUKWU sent defendant IRO account information for a Wells Fargo account ending in 4636 opened in the name of Chinese Company 2 (the "Wells Fargo 4636 Account").

1 Overt Act No. 221: On or about July 17, 2017, defendant SAM MAL
2 told defendant IRO that Victim Company 13 would be making a payment
3 to Chinese Company 2, which defendant IRO then told defendant CATHEY
4 on or about July 18, 2017.

5 Overt Act No. 222: On or about August 3, 2017, an unknown
6 coconspirator fraudulently induced Victim Company 13 to send a wire
7 transfer of approximately \$382,295 from its account at Abu Dhabi
8 Commercial Bank in Dubai to the Chase 5092 Account.

9 Overt Act No. 223: On or about August 5, 2017, defendants IRO
10 and CATHEY caused a cashier's check of approximately \$47,606.40
11 addressed to the name of a United Kingdom company to be purchased
12 from the Chase 5092 Account.

13 Overt Act No. 224: On or about August 5, 2017, defendants IRO
14 and CATHEY caused a cashier's check of approximately \$52,602
15 addressed to the name of Chinese Company 1 to be purchased from the
16 Chase 5092 Account.

17 Overt Act No. 225: On or about August 7, 2017, defendants IRO
18 and CATHEY caused a cashier's check of approximately \$65,965
19 addressed to UICC 10 to be purchased from the Chase 5092 Account.

20 Overt Act No. 226: On or about August 8, 2017, defendants IRO
21 and CATHEY caused a cashier's check of approximately \$35,000
22 addressed to a name similar to an Indian company to be purchased from
23 the Chase 5092 Account.

24 Overt Act No. 227: On or about August 9, 2017, defendants IRO
25 and CATHEY caused a cashier's check of approximately \$35,000
26 addressed to a name similar to an Indian company ("Indian Company 1")
27 to be purchased from the Chase 5092 Account.

1 the Mauritius Company as its business name, in Carson, California
2 (the "Chase 0038 Account").

3 Overt Act No. 235: On or about January 18, 2018, an unknown
4 coconspirator fraudulently induced Victim Company 14 to send a wire
5 transfer of approximately \$76,688.99 from its account at Commerzbank
6 AG in Germany to defendant AJAEZE's Chase 0038 Account.

7 Overt Act No. 236: On or about January 19, 2018, defendant
8 AJAEZE sent a wire transfer of approximately \$27,455 from the Chase
9 0038 Account to a Wells Fargo account in the name "Cadon Auto
10 Corporation."

11 Overt Act No. 237: On or about January 19, 2018, defendant
12 AJAEZE sent a wire transfer of approximately \$51,865 from the Chase
13 0038 Account to a Mashreqbank PSC account in the United Arab Emirates
14 in the name "Elite Auto Fze."

15 Overt Act No. 238: On or about January 22, 2018, defendants IRO
16 and AJAEZE withdrew approximately \$500 from the Chase 0038 Account
17 from an ATM in Los Angeles, California.

18 Overt Act No. 239: On or about January 23, 2018, defendant
19 AJAEZE withdrew approximately \$500 from the Chase 0038 Account from
20 an ATM in Carson, California.

21 Overt Act No. 240: On or about January 30, 2018, an unknown
22 coconspirator fraudulently induced Victim Company 14 to send a wire
23 transfer of approximately \$39,004.47 from its account at Commerzbank
24 AG in Germany to defendant AJAEZE's Chase 0038 Account.

25 Overt Act No. 241: On or about January 30, 2018, defendant
26 AJAEZE withdrew approximately \$500 from the Chase 0038 Account from
27 an ATM in Los Angeles, California.

Overt Act No. 250: On or about February 16, 2018, defendant AJAEZE sent a wire transfer of approximately \$189,000 from the Chase 0038 Account to a Compass Bank account ending in 3681 of defendant IKOGHO, in Lynwood, California (the "Compass Bank 3681 Account").

Overt Act No. 251: On or about February 16, 2018, defendant IKOGHO cashed a check for approximately \$8,000 from the Compass Bank 3681 Account.

Overt Act No. 252: On or about February 16, 2018, defendant IKOGHO purchased a cashier's check for approximately \$35,000 from the Compass Bank 3681 Account.

Overt Act No. 253: On or about February 16, 2018, defendant AJAEZE withdrew approximately \$8,000 from the Chase 0038 Account from a Chase bank branch in Carson, California.

Overt Act No. 254: On or about February 17, 2018, defendant AJAEZE withdrew approximately \$500 from the Chase 0038 Account from an ATM in Los Angeles, California.

Victim Company 16

Overt Act No. 255: On or about January 22, 2018, defendant AJAEZE opened a Wells Fargo account ending in 1849, in Carson, California (the "Wells Fargo 1849 Account").

Overt Act No. 256: On or about February 13, 2018, defendant AJAEZE filed a Fictitious Business Name Statement with the Los Angeles County Registrar-Recorder/County Clerk's Office in the name of a Washington-based company (the "Washington Company").

Overt Act No. 257: On or about February 15, 2018, an unknown coconspirator fraudulently induced Victim Company 16 to send a wire transfer of approximately \$1,750,000 from its account at National

Westminster Bank PLC, in the United Kingdom, to defendant AJAEZE's Wells Fargo 1849 Account.

Overt Act No. 258: On or about February 16, 2018, defendant AJAEZE opened a Wells Fargo account ending in 7748, in Westchester, California, in the name of the Washington Company (the "Wells Fargo 7748 Account").

Overt Act No. 259: On or about February 20, 2018, defendant AJAEZE made a wire transfer of approximately \$200,000 from the Wells Fargo 1849 Account to the Wells Fargo 7748 Account.

Overt Act No. 260: On or about February 20, 2018, defendant AJAEZE made a wire transfer of approximately \$500,000 from the Wells Fargo 1849 Account to the Wells Fargo 7748 Account.

Overt Act No. 261: On or about February 20, 2018, defendant AJAEZE made a wire transfer of approximately \$500,000 from the Wells Fargo 1849 Account to the Wells Fargo 7748 Account.

Additional Overt Acts

Overt Act No. 262: On or about October 7, 2014, defendant IRO told defendant IZUNWANNE that he could get personal and company bank accounts "everywhere," including Malaysia, Indonesia, China, Hong Kong, Italy, Germany, the United Kingdom, and India.

Overt Act No. 263: On or about November 3, 2014, in response to defendant IZUNWANNE's request for a bank account in the Ukraine that could receive the proceeds of a BEC fraud, defendant IRO negotiated the rate that he would charge – telling defendant IZUNWANNE "what matter is . . . making sure your money come out without any story" – and sent defendant IZUNWANNE the account information, including the account number and correspondent bank account number, for the Private Bank Dnipropetrovsk account of P.N.M.

1 Overt Act No. 264: On or about December 4, 2014, defendant IRO
2 sent defendant ONWUASOANYA the account information, including the
3 account number and the routing number, for a BOA account ending in
4 8074, opened by defendant IRO dba "Iro Enterprises," and defendants
5 IRO and ONWUASOANYA discussed the rates that defendant IRO would
6 charge for receiving and laundering the proceeds of BEC frauds and
7 romance scams.

8 Overt Act No. 265: On or about March 29, 2016, defendant IRO
9 asked defendant ISAMADE to open a bank account with a specific
10 company name at Chase or US Bank, but not Bank of America.

11 Overt Act No. 266: On or about November 21, 2016, defendant
12 IGBOKWE sent defendant EZIRIM the account information for the US Bank
13 2982 Account, including the name of UICC 2, the account number, and
14 the routing number.

15 Overt Act No. 267: On or about January 2, 2017, defendant UGWU
16 requested a bank account that could receive an approximately \$500,000
17 BEC fraud payment from Turkey.

18 Overt Act No. 268: On or about January 2, 2017, defendant
19 IGBOKWE sent defendant IWU the account information for the US Bank
20 2669 Account, including the name of UICC 1, the account number, and
21 the routing number.

22 Overt Act No. 269: On or about January 16, 2017, defendant
23 IGBOKWE sent defendant UBASINEKE the account information for a
24 SunTrust account ending in 8108 of UICC 18 (the "SunTrust 8108
25 Account"), including the name of UICC 18, the account number, and the
26 routing number, to use in receiving a \$150,000 BEC fraud payment.

27 Overt Act No. 270: On or about January 18, 2017, defendant
28 MEZIENWA told defendant IGBOKWE that he was using the SunTrust 8108

1 Account that defendant IGBOKWE had provided to him, including the
2 name of UICC 18, the account number, and the routing number, to use
3 in receiving a \$200,000 fraudulent payment.

4 Overt Act No. 271: On or about January 18, 2017, in response to
5 defendant ODIONYENMA's request for a bank account that could receive
6 an approximately \$10,000 BEC fraud payment, defendant IGBOKWE sent
7 defendant ODIONYENMA the account information, including the name of
8 UICC 9, the account numbers, and the routing numbers, for the US Bank
9 0362 Account and the Wells Fargo 7245 Account.

10 Overt Act No. 272: On or about January 21, 2017, in response to
11 defendant IKEWESI's request for a bank account that could receive an
12 approximately \$500,000 BEC fraud payment, defendant IGBOKWE sent
13 defendant IKEWESI the account information for a Wells Fargo account
14 ending in 1243 of UICC 17 ("Wells Fargo 1243 Account") and for the US
15 Bank 0362 Account, including the account numbers and the routing
16 numbers.

17 Overt Act No. 273: On or about January 21, 2017, in response to
18 defendant MEZIENWA's request for a bank account that could receive an
19 approximately \$3,000 fraudulent payment, defendant IGBOKWE sent
20 defendant MEZIENWA the account information for the Chase 7605
21 Account, including the account number and the routing number.

22 Overt Act No. 274: On or about January 23, 2017, in response to
23 defendant NZENWAH's request for a bank account that could receive an
24 approximately \$250,000 BEC fraud payment, defendant IGBOKWE sent
25 defendant NZENWAH the account information for a TD Bank account
26 ending in 2396 of UICC 19 (the "TD Bank 2396 Account"), a Regions
27 Bank account ending in 6371 (the "Regions Bank 6371 Account"), and
28

1 the SunTrust 8108 Account, including the account numbers and the
2 routing numbers.

3 Overt Act No. 275: On or about January 24, 2017, in response to
4 defendant IBETO's request for a bank account that could receive an
5 approximately \$1,300 fraudulent payment, defendant IGBOKWE sent
6 defendant IBETO the account information for the Chase 7605 Account,
7 including the account number and the routing number.

8 Overt Act No. 276: On or about January 25, 2017, defendant
9 MEGWA sent defendant IGBOKWE the account information for the US Bank
10 0362 Account, including the account number and the routing number.

11 Overt Act No. 277: On or about January 25, 2017, defendant
12 IGBOKWE sent defendant IBETO the account information for the Wells
13 Fargo 7245 Account and the US Bank 0362 Account, including the
14 account numbers and the routing numbers, to use in receiving a
15 fraudulent payment.

16 Overt Act No. 278: On or about January 26, 2017, defendant
17 MEGWA sent defendant IGBOKWE the account information for the Wells
18 Fargo 7245 Account, including the account number and the routing
19 number.

20 Overt Act No. 279: On or about January 26, 2017, defendant
21 IGBOKWE sent defendant MEGWA the account information for the US Bank
22 0362 Account, including the account number and the routing number.

23 Overt Act No. 280: On or about January 26, 2017, in response to
24 defendant IKEWESI's request for a BOA account that could receive an
25 approximately \$500,000 BEC fraud payment, defendant IGBOKWE sent
26 defendant IKEWESI the account information for a BOA account ending in
27 2942 of UICC 20 (the "BOA 2942 Account"), including the account
28 number and the routing number.

1 Overt Act No. 281: On or about January 26, 2017, in response to
2 defendant IKEWESI's request for a bank account that could receive an
3 approximately \$200,000 BEC fraud payment, defendant IGBOKWE sent
4 defendant IKEWESI the account information for the SunTrust 8108
5 Account, including the name of UICC 18, the account number, and the
6 routing number.

7 Overt Act No. 282: On or about January 27, 2017, in response to
8 defendant C. DURU's request for a bank account that could receive an
9 approximately \$7,000 fraudulent payment, defendant IGBOKWE sent
10 defendant C. DURU the account information for the Chase 7605 Account,
11 including the account number and the routing number.

12 Overt Act No. 283: On or about February 3, 2017, in response to
13 defendant AGUBE's request for a bank account that could receive an
14 approximately \$192,000 fraudulent payment, defendant IGBOKWE sent
15 defendant AGUBE the account information for the Chase 7605 Account,
16 including the account number and the routing number.

17 Overt Act No. 284: On or about February 6, 2017, defendant
18 IGBOKWE sent defendant UGWU the account information for the US Bank
19 2982 Account, including the name of UICC 2, the account number, and
20 the routing number.

21 Overt Act No. 285: On or about February 9, 2017, in response to
22 defendant OSUJI's request for a bank account that could receive an
23 approximately \$20,000 fraudulent payment, defendant IGBOKWE sent
24 defendant OSUJI the account information for the Chase 7605 Account,
25 including the account number and the routing number.

26 Overt Act No. 286: On or about February 10, 2017, in response
27 to defendant UCHE's request for a bank account that could receive an
28 approximately \$50,000 romance scam payment, defendant IGBOKWE sent

1 defendant UCHE the account information for the Chase 7605 Account,
2 including the account number and the routing number.

3 Overt Act No. 287: On or about February 11, 2017, after
4 defendant IGBOKWE sent defendant MEGWA the account information for
5 the US Bank 0362 Account and two Wells Fargo Accounts – including the
6 account numbers and the routing numbers – defendant MEGWA told
7 defendant IGBOKWE that the US Bank account was “alive” but that the
8 Wells Fargo accounts had been closed.

9 Overt Act No. 288: On or about February 13, 2017, in response
10 to defendant ONUDOROGU’s request for a bank account to receive an
11 approximately \$6,000 fraudulent payment, defendant IGBOKWE sent
12 defendant ONUDOROGU the account information for the Chase 7605
13 Account, including the account number and the routing number.

14 Overt Act No. 289: On or about February 15, 2017, defendant
15 IGBOKWE sent defendant IWUOHA the account information for the Chase
16 7605 Account, including the account number and the routing number,
17 for use in receiving fraudulent payments.

18 Overt Act No. 290: On or about February 16, 2017, defendant
19 IGBOKWE sent defendant MEGWA the account information for the US Bank
20 2982 Account, including the name of UICC 2, the account number, and
21 the routing number.

22 Overt Act No. 291: On or about February 20, 2017, in response
23 to defendant MARK CHUKWUOCHA’s request for a bank account that could
24 receive an approximately \$146,000 fraudulent payment, defendant
25 IGBOKWE sent defendant MARK CHUKWUOCHA the account information for
26 the US Bank 0362 Account, including the account number and the
27 routing number.

1 Overt Act No. 292: On or about February 21, 2017, in response
2 to defendant MACWILLIAM CHUKWUOCHA's request for a bank account that
3 could receive a fraudulent wire of approximately \$100,000 from Qatar,
4 defendant IGBOKWE provided defendant MACWILLIAM CHUKWUOCHA the
5 account information for a Chase account ending in 3228 of UICC 21
6 (the "Chase 3228 Account"), including the account number and the
7 routing number.

8 Overt Act No. 293: On or about February 21, 2017, after
9 defendant MARK CHUKWUOCHA told defendant IGBOKWE that approximately
10 \$8,304.57 had been deposited to the Wells Fargo 1243 Account,
11 defendant IGBOKWE told him that the account had been closed due to
12 fraudulent transactions.

13 Overt Act No. 294: On or about February 22, 2017, in response
14 to defendant OHAJIMKPO's request for a credit card to use in
15 receiving approximately \$850,000 in fraudulent funds, defendant
16 IGBOKWE responded, in part, "if use my card FBI will come 4 me."

17 Overt Act No. 295: On or about February 23, 2017, in response
18 to defendant EJIOFOR's request for a bank account that could receive
19 an approximately \$16,000 fraudulent payment, defendant IGBOKWE sent
20 defendant EJIOFOR the account information for the Wells Fargo 7245
21 Account, including the name of UICC 9, the account number, and the
22 routing number.

23 Overt Act No. 296: On or about February 24, 2017, in response
24 to defendant EZIRIM's request for a bank account that could receive
25 an approximately \$100,000 BEC fraud payment from Korea, defendant
26 IGBOKWE provided defendant EZIRIM the account information for the
27 Chase 3228 Account, including the account number and the routing
28 number.

1 Overt Act No. 297: On or about February 25, 2017, defendant IRO
2 sent defendant CHUKWU the account information for a Wells Fargo
3 account ending in 6969 of defendant EKECHUKWU (the "Wells Fargo 6969
4 Account"), including the account number and the routing number.

5 Overt Act No. 298: On or about February 28, 2017, in response
6 to defendant UCHE's request for a bank account that could receive an
7 approximately \$60,000 fraudulent payment, defendant IGBOKWE sent
8 defendant UCHE the account information for the US Bank 0362 Account,
9 including the account number and the routing number.

10 Overt Act No. 299: On or about March 1, 2017, defendant UMEJESI
11 sent defendant IGBOKWE the account information for the US Bank 0362
12 Account, including the account number and the routing number.

13 Overt Act No. 300: On or about March 1, 2017, defendant IGBOKWE
14 sent defendant UCHE the account information for the US Bank 0362
15 Account, including the account number and the routing number.

16 Overt Act No. 301: On or about March 1, 2017, defendant IGBOKWE
17 sent defendant UCHE the account information for the US Bank 2982
18 Account, including the name of UICC 2, the account number, and the
19 routing number.

20 Overt Act No. 302: On or about March 1, 2017, in response to a
21 request by defendant OFORKA in coded language for a bank account that
22 could receive a fraudulent payment of approximately \$28,000,
23 defendant IRO sent defendant OFORKA the account information for the
24 Wells Fargo 6969 Account, including the account number and the
25 routing number.

26 Overt Act No. 303: On or about March 2, 2017, defendant IGBOKWE
27 sent defendant IWU the account information for a Wells Fargo account
28 ending in 6307 of UICC 2 (the "Wells Fargo 6307 Account"), including

1 the account number and the routing number, to receive fraudulent
2 payments.

3 Overt Act No. 304: On or about March 3, 2017, in response to
4 defendant MBA's request for a bank account that could receive an
5 approximately \$32,000 BEC fraud payment, defendant IGBOKWE sent
6 defendant MBA the account information for the Wells Fargo 6307
7 Account, including the account number and the routing number.

8 Overt Act No. 305: On or about March 5, 2017, defendant IGBOKWE
9 sent defendant OHAJIMKPO the account information for the Wells Fargo
10 7245 Account, including the name of UICC 9, the account number, and
11 the routing number.

12 Overt Act No. 306: On or about March 6, 2017, in response to
13 defendant MBA's request for a bank account that could receive an
14 approximately \$25,000 BEC fraud payment, defendant IGBOKWE sent
15 defendant MBA the account information for the Wells Fargo 7245
16 Account, including the name of UICC 9, the account number, and the
17 routing number.

18 Overt Act No. 307: On or about March 6, 2017, in response to
19 defendant CHUKWU's request for a bank account that could receive an
20 approximately \$50,000 romance scam payment, defendant IGBOKWE sent
21 defendant CHUKWU the account information for the BOA 2942 Account,
22 including the account number and the routing number.

23 Overt Act No. 308: On or about March 6, 2017, defendant IGBOKWE
24 told defendant IWU that he could use the Wells Fargo 6307 Account to
25 receive a romance scam payment.

26 Overt Act No. 309: On an unknown date, no later than March 7,
27 2017, defendant UKACHUKWU gave defendant AGWUEGBO the phone number of
28 defendant IGBOKWE.

1 Overt Act No. 310: On or about March 7, 2017, after defendant
2 AGWUEGBO told defendant IGBOKWE that he needed Wells Fargo accounts
3 to receive BEC fraud payments from China, defendant IGBOKWE sent
4 defendant AGWUEGBO the account information for a US Bank account
5 ending in 9570 ("US Bank 9570 Account), including the account number
6 and the routing number.

7 Overt Act No. 311: On or about March 7, 2017, defendant IGBOKWE
8 sent defendant UCHE the account information for the US Bank 9570
9 Account, including the account number and the routing number.

10 Overt Act No. 312: On or about March 9, 2017, in response to
11 defendant MADUFOR's request for a bank account that could receive an
12 approximately \$130,000 fraudulent payment, defendant IGBOKWE sent
13 defendant MADUFOR the account information for the TD Bank 2396
14 Account, including the account number and the routing number.

15 Overt Act No. 313: On or about March 10, 2017, in response to
16 defendant OKORIE's request for a bank account that could receive an
17 approximately \$9,000 romance scam payment, defendant IGBOKWE sent
18 defendant OKORIE the account information for the Chase 7605 Account,
19 including the account number and the routing number.

20 Overt Act No. 314: On or about March 10, 2017, defendant
21 IGBOKWE sent defendant IBETO the account information for the US Bank
22 9570 Account, including the account number and the routing number.

23 Overt Act No. 315: On or about March 10, 2017, defendant
24 IGBOKWE sent defendant EJIOFOR the account information for the Chase
25 3228 Account, including the account number and the routing number, to
26 use in receiving a fraudulent transaction.

1 Overt Act No. 316: On or about March 14, 2017, defendant
2 IGBOKWE sent defendant UMEJESI the account information for the BOA
3 4859 Account, including the account number and the routing number.

4 Overt Act No. 317: On or about March 14, 2017, defendant
5 IGBOKWE sent defendant ISAMADE the account information for the BOA
6 4859 Account, including the account number and the routing number, to
7 receive romance scam payments, which defendant ISAMADE expected to
8 total approximately \$59,000.

9 Overt Act No. 318: On or about March 14, 2017, in response to
10 defendant AGWUEGBO's request for a bank account that could receive an
11 approximately \$100,000 fraudulent transaction, defendant IGBOKWE sent
12 defendant AGWUEGBO the account information for the US Bank 0362
13 Account, including the account number and the routing number.

14 Overt Act No. 319: On or about March 16, 2017, in response to
15 defendant UCHE's request for a bank account that could receive a
16 fraudulent payment of approximately \$1,300,000 from Tanzania,
17 defendant IGBOKWE provided defendant UCHE the account information for
18 the Chase 5027 Account, including the account number and the routing
19 number.

20 Overt Act No. 320: On or about March 16, 2017, defendant
21 IGBOKWE sent defendant UKACHUKWU the account information for the BOA
22 4859 Account, including the account number and the routing number.

23 Overt Act No. 321: On or about March 16, 2017, defendant
24 IGBOKWE sent defendant MBA the account information for the Wells
25 Fargo 7245 Account, including the account number and the routing
26 number.

27 Overt Act No. 322: On or about March 16, 2017, in response to
28 defendant OHIRI's request for a bank account that could receive an

1 approximately \$5,000 romance scam payment, defendant IGBOKWE sent
2 defendant OHIRI the account information for the US Bank 2982 Account,
3 including the account number and the routing number.

4 Overt Act No. 323: On or about March 17, 2017, defendant
5 UMEJESI sent defendant IRO the account information for the Wells
6 Fargo 7245 Account, including the account number and the routing
7 number.

8 Overt Act No. 324: On or about March 17, 2017, in response to
9 defendant OKAFOR's request for a bank account that could receive an
10 approximately \$88,000 BEC fraud payment, defendant IRO sent defendant
11 OKAFOR the account information for the Wells Fargo 7245 Account,
12 including the account number and the routing number.

13 Overt Act No. 325: On or about March 20, 2017, defendant
14 IGBOKWE sent defendant ONUWA the account information for the Chase
15 5027 Account, including the name of UICC 1, the account number, and
16 the routing number.

17 Overt Act No. 326: On or about March 21, 2017, in response to
18 defendant OGBONNA's request for a bank account that could receive an
19 approximately \$700,000 romance scam payment, defendant IRO sent
20 defendant OGBONNA the account information for the Chase 5027 Account,
21 including the account number and the routing number.

22 Overt Act No. 327: On or about March 21, 2017, defendant IRO
23 sent defendant OKAFOR the account information for the Chase 5027
24 Account, including the account number and the routing number, for use
25 in a romance scam scheme.

26 Overt Act No. 328: On or about March 22, 2017, defendant IRO
27 sent defendant OGUNGBE the account information for the Chase 5027
28

1 Account, including the account number and the routing number, to
2 receive an approximately \$3,000,000 transaction from the Philippines.

3 Overt Act No. 329: On or about March 23, 2017, defendant IRO
4 sent defendant ANOZIE an audio recording of himself on the phone with
5 a Chase representative, in which defendant IRO purported to be
6 defendant IGBOKWE while inquiring about a Chase account ending in
7 0595, opened by defendant IGBOKWE.

8 Overt Act No. 330: On or about March 29, 2017, defendant NNAMDI
9 DURU created an email account at the request of defendant IRO, which
10 email account used the name of UICC 25.

11 Overt Act No. 331: On or about March 29, 2017, in response to
12 defendant OKAFOR's request for a bank account that could receive an
13 approximately \$100,000 BEC fraud payment, defendant IRO sent
14 defendant OKAFOR the account information for a BOA account ending in
15 0358 (the "BOA 0358 Account"), including the account number and the
16 routing number.

17 Overt Act No. 332: On or about March 30, 2017, defendant
18 IGBOKWE sent defendant OBASI the account information for a Citibank
19 account ending in 0126 of UICC 2, including the account number and
20 the routing number, to receive a BEC fraud payment.

21 Overt Act No. 333: On or about April 2, 2017, in response to
22 defendant ANYANWU's request for a bank account that could receive
23 approximately \$59,000 in BEC fraud payments, defendant IRO sent
24 defendant ANYANWU the account information for a Wells Fargo account
25 ending in 7276 of UICC 21 (the "Wells Fargo 7276 Account"), including
26 the account number and the routing number.

27 Overt Act No. 334: On or about April 2, 2017, in response to
28 defendant OBASI's request for a bank account that could receive an

1 approximately \$159,000 BEC fraud payment, defendant IGBOKWE sent
2 defendant OBASI the account information for the Wells Fargo 7276
3 Account, including the account number and the routing number.

4 Overt Act No. 335: On or about April 3, 2017, defendant IRO
5 sent defendant NNAMDI DURU photographs of banking documents in the
6 name of UICC 25, including the Chase 7866 Account and the Chase 9927
7 Account.

8 Overt Act No. 336: On or about April 3, 2017, in response to
9 defendant OKAFOR's request for a bank account that could receive an
10 approximately \$70,000 BEC fraud payment, defendant IRO sent defendant
11 OKAFOR the account information for a BOA account ending in 8560 of
12 UICC 10 in Forest Park, Georgia (the "BOA 8560 Account"), including
13 the account number and the routing number.

14 Overt Act No. 337: On or about April 3, 2017, defendant IRO
15 assisted defendant NNAMDI DURU in purchasing a list of email
16 addresses of real estate agents in New York State for use in sending
17 emails intended to disseminate malicious software in furtherance of
18 fraudulent schemes.

19 Overt Act No. 338: On or about April 3, 2017, in response to
20 defendant OHAJIMKPO's request for a bank account that could receive
21 an approximately \$98,000 BEC fraud payment from China, defendant
22 IGBOKWE sent defendant OHAJIMKPO the account information for the BOA
23 1004 Account, including the account number and the routing number.

24 Overt Act No. 339: On or about April 4, 2017, defendant OJIMBA
25 opened a bank account at the request of defendant IRO, and assured
26 defendant IRO that his work for defendant would remain a "secret."

27 Overt Act No. 340: On or about April 4, 2017, in response to
28 defendant OFORKA's request in coded language for a bank account that

1 could receive an approximately \$600,000 BEC fraud payment, with total
2 anticipated BEC fraud payments of approximately \$12,000,000,
3 defendant IRO sent defendant OFORKA the account information for a BOA
4 account ending in 4560 of UICC 22 (the "BOA 4560 Account"), including
5 the account number and the routing number.

6 Overt Act No. 341: On or about April 4, 2017, in response to
7 defendant NNAMDI DURU's request for a bank account that could receive
8 a fraudulent payment of approximately \$1,700,000 from Dubai,
9 defendant IRO sent defendant NNAMDI DURU the account information for
10 the BOA 8560 Account, including the account number and the routing
11 number.

12 Overt Act No. 342: On or about April 7, 2017, in response to
13 defendant OHAJIMKPO's request for a bank account to receive an
14 approximately \$150,000 romance scam payment, defendant IGBOKWE sent
15 defendant OHAJIMKPO the account information for the Chase 5027
16 Account, including the account number and the routing number.

17 Overt Act No. 343: On or about April 10, 2017, defendant NNAMDI
18 DURU told defendant IRO about a Brazilian company that would be
19 making a fraudulent payment.

20 Overt Act No. 344: On or about April 12, 2017, defendant
21 IGBOKWE sent defendant MBA the account information for the Wells
22 Fargo 4899 Account of defendant P. DURU, including the account number
23 and the routing number, and told defendant MBA to use the bank
24 account for "big money."

25 Overt Act No. 345: On or about April 12, 2017, in response to
26 defendant ANYANWU's request for a bank account that could receive an
27 approximately \$100,000 BEC fraud payment, defendant IRO sent
28

1 defendant ANYANWU the account information for the BOA 8560 Account,
2 including the account number and the routing number.

3 Overt Act No. 346: On or about April 12, 2017, in response to
4 defendant ANYANWU's request for a bank account that could receive an
5 approximately \$80,000 romance scam payment, defendant IRO sent
6 defendant ANYANWU the account information for the Chase 7866 Account,
7 including the name of UICC 25, the account number, and the routing
8 number.

9 Overt Act No. 347: On or about April 12, 2017, in response to
10 defendant E. DIKE's request for a bank account that could receive
11 approximately \$3,000 in romance scam payments, defendant IRO sent
12 defendant E. DIKE the account information for the Chase 7866 Account,
13 including the name of UICC 25, the account number, and the routing
14 number.

15 Overt Act No. 348: On or about April 13, 2017, defendant
16 ODIMARA asked defendant IGBOKWE for multiple bank accounts to receive
17 fraudulent payments totaling more than \$450,000.

18 Overt Act No. 349: On or about April 13, 2017, in response to a
19 request from defendant AWAK for a bank account that could receive the
20 proceeds of a romance scam, defendant IRO sent defendant AWAK the
21 account information for the Chase 7866 Account, including the name of
22 UICC 25, the account number, and the routing number.

23 Overt Act No. 350: On or about April 13, 2017, defendant OJIMBA
24 sent defendant IRO the account information for a BOA account ending
25 in 7032 of UICC 22 (the "BOA 7032 Account"), including the name of
26 UICC 22, the account number, and the routing number, and asked
27 defendant IRO not to use that account again because BOA told UICC 22
28 it was investigating the account.

1 Overt Act No. 351: On or about April 13, 2017, defendant IRO
2 advised defendant OJIMBA to attempt to reopen the BOA 7032 Account at
3 Chase or US Bank, and to use the same business name as the BOA 7032
4 Account.

5 Overt Act No. 352: On or about April 14, 2017, defendant OJIMBA
6 sent defendant IRO the account information for a US Bank account
7 ending in 1789 (the "US Bank 1789 Account"), including the name of
8 UICC 22, the account number, and the routing number.

9 Overt Act No. 353: On or about April 14, 2017, after defendant
10 NNAMDI DURU requested a bank account that could receive \$200,000,000
11 in fraudulent funds, defendant IRO sent defendant NNAMDI DURU the
12 account information for the BOA 8560 Account and the Wells Fargo 4899
13 Account, but then sent the account information for the Chase 5027
14 Account, which defendant IRO said was "stronger."

15 Overt Act No. 354: On or about April 14, 2017, defendant
16 IGBOKWE sent defendant OCHIAGHA the account information for the Wells
17 Fargo 4899 Account and the BOA 1004 Account, including the account
18 numbers and the routing numbers, and told defendant OCHIAGHA that the
19 BOA 1004 Account could be used to receive a BEC fraud payment.

20 Overt Act No. 355: On or about April 16, 2017, in response to
21 defendant OGBONNA's request for a bank account that could receive an
22 approximately \$25,000 romance scam payment, defendant IRO sent
23 defendant OGBONNA the account information for the Chase 7866 Account,
24 including the name of UICC 25, the account number, and the routing
25 number.

26 Overt Act No. 356: On or about April 16, 2017, in response to
27 defendant CHIKA's request for a bank account that could receive an
28 approximately \$10,000 romance scam payment, defendant IRO sent

1 defendant CHIKA the account information for the Chase 7866 Account,
2 including the name of UICC 25, the account number, and the routing
3 number.

4 Overt Act No. 357: On or about April 17, 2017, after defendant
5 CHILAKA requested a bank account that could receive the proceeds of a
6 BEC fraud, defendant IGBOKWE sent defendant CHILAKA the account
7 information for the BOA 4859 Account, including the account number
8 and the routing number.

9 Overt Act No. 358: On or about April 20, 2017, defendant
10 IGBOKWE sent defendant UMEJESI the account information for the Wells
11 Fargo 4899 Account, including the account number and the routing
12 number.

13 Overt Act No. 359: On or about April 20, 2017, defendant
14 IGBOKWE sent defendant UZOKA the account information for the Wells
15 Fargo 4899 Account, including the account number and the routing
16 number.

17 Overt Act No. 360: On or about April 20, 2017, defendant
18 IGBOKWE sent defendant ODIONYENMA the account information for the
19 Wells Fargo 4899 Account, including the account number and the
20 routing number.

21 Overt Act No. 361: On or about April 24, 2017, defendant
22 IGBOKWE sent defendant ONUWA the account information for the Chase
23 5027 Account, including the name of UICC 1, the account number, and
24 the routing number.

25 Overt Act No. 362: On or about April 24, 2017, in response to
26 defendant MADUFOR's request for a bank account that could receive an
27 approximately \$150,000 BEC fraud payment, defendant IGBOKWE sent
28 defendant MADUFOR the account information for the Wells Fargo 4899

1 Account and the BOA 1004 Account, including the account numbers and
2 the routing numbers.

3 Overt Act No. 363: On or about April 25, 2017, defendant IRO
4 told defendant OJIMBA to "start servicing" the US Bank 1789 account
5 because he was expecting a payment of approximately \$1,700,000 to
6 arrive in the account.

7 Overt Act No. 364: On or about April 25, 2017, in response to a
8 request from defendant ISAMADE for a bank account that could receive
9 a BEC fraud payment, defendant IGBOKWE sent defendant ISAMADE the
10 account information for a Wells Fargo account ending in 5309 of UICC
11 23 ("Wells Fargo 5309 Account"), including the name of UICC 23, the
12 account number, and the routing number.

13 Overt Act No. 365: On or about April 25, 2017, defendant
14 IGBOKWE sent defendant NNEBEDUM the account information for the Wells
15 Fargo 5309 Account, including the account-holder's name, the account
16 number, and the routing number, to receive fraudulent transactions
17 totaling approximately \$157,000.

18 Overt Act No. 366: On or about April 27, 2017, defendant
19 IGBOKWE sent defendant UGWU the account information for the BOA 1004
20 Account, including the name of UICC 11, the account number, and the
21 routing number.

22 Overt Act No. 367: On or about April 28, 2017, defendants
23 ODIMARA and IGBOKWE discussed a fraudulent payment of approximately
24 \$36,274 made to the Wells Fargo 7276 Account.

25 Overt Act No. 368: On or about April 29, 2017, defendant
26 IGBOKWE sent defendant ONYEKA the account information for the US Bank
27 0362 Account, including the account number and the routing number.

1 Overt Act No. 369: On or about May 2, 2017, in response to
2 defendant OKOLO's request for a bank account that could receive an
3 approximately \$766,000 BEC fraud payment, defendant IGBOKWE sent
4 defendant OKOLO the account information for the Chase 5899 Account,
5 including the account number and the routing number.

6 Overt Act No. 370: On or about May 4, 2017, defendant IRO sent
7 defendant E. DIKE the account information for the BOA 2660 Account,
8 including the account number and the routing number, for use in
9 receiving a romance scam payment and told him how to avoid having his
10 victim learn the money would be deposited to a bank account in
11 California.

12 Overt Act No. 371: On or about May 5, 2017, defendant IGBOKWE
13 sent defendant ONUWA the account information for the Chase 5027
14 Account, including the name of UICC 1, the account number, and the
15 routing number.

16 Overt Act No. 372: On or about May 8, 2017, in response to a
17 request from defendant UZOKA for a bank account that could receive an
18 approximately \$300,000 BEC fraud payment, defendant IGBOKWE sent
19 defendant UZOKA the account information for the Chase 5899 Account,
20 including the account number and the routing number.

21 Overt Act No. 373: On or about May 15, 2017, in response to
22 defendant ONWUASOANYA's request for a bank account that could receive
23 a romance scam payment totaling approximately \$200,000, defendant IRO
24 sent defendant ONWUASOANYA the account information for defendant
25 IGBOKWE's BOA 2660 Account, including the account number and the
26 routing number.

27 Overt Act No. 374: On or about May 17, 2017, in response to a
28 request by defendant AZUBUIKE for a bank account that could receive

1 an approximately \$70,000 romance scam payment, defendant IGBOKWE sent
2 defendant AZUBUIKE the account information for a Wells Fargo account
3 ending in 4216 (the "Wells Fargo 4216 Account"), including the name
4 of UICC 22, the account number, and the routing number.

5 Overt Act No. 375: On or about May 17, 2017, defendant IGBOKWE
6 sent defendant UGWU the account information for a Chase account
7 ending in 3995 of UICC 22 (the "Chase 3995 Account"), including the
8 name of UICC 22, the account number, and the routing number.

9 Overt Act No. 376: On or about May 17, 2017, in response to
10 defendant OKEREKE's request for a bank account that could receive an
11 approximately \$35,000 romance scam payment, defendant IGBOKWE sent
12 defendant OKEREKE the account information for the Wells Fargo 1147
13 Account, including the account number and the routing number.

14 Overt Act No. 377: On or about May 17, 2017, defendant IGBOKWE
15 sent defendant OKEREKE the account information for the Chase 5027
16 Account, including the name of UICC 1, the account number, and the
17 routing number, to receive an approximately \$2,000 romance scam
18 payment.

19 Overt Act No. 378: On or about May 19, 2017, in response to a
20 request by defendant UZOKA for a bank account that could receive an
21 approximately \$350,000 romance scam payment, defendant IGBOKWE sent
22 defendant UZOKA the account information for the Chase 7605 Account,
23 including the name the account number and the routing number.

24 Overt Act No. 379: On or about May 23, 2017, defendant AGUH
25 told defendant IGBOKWE that he was using the BOA 2660 Account that
26 defendant IGBOKWE had provided to him, including the account number,
27 and the routing number, to use in receiving a fraudulent payment.

1 Overt Act No. 380: On or about May 23, 2017, defendants IRO and
2 EKI discussed whether the Chase 7866 Account had received a
3 fraudulent payment.

4 Overt Act No. 381: On or about May 26, 2017, in response to
5 defendant OFORKA's request for a bank account that could receive a
6 fraudulent payment of approximately \$100,000, defendant IRO sent
7 defendant OFORKA the account information for the Chase 5027 Account,
8 including the account number and the routing number.

9 Overt Act No. 382: On or about May 29, 2017, in response to
10 defendant OKOLO's request for a bank account that could receive an
11 approximately \$92,000 BEC fraud payment, defendant IGBOKWE sent
12 defendant OKOLO the account information for the Wells Fargo 5309
13 Account and the Chase 3995 Account, including the account numbers and
14 the routing numbers.

15 Overt Act No. 383: On or about June 1, 2017, defendant IGBOKWE
16 sent defendant ODIMARA the account information for the Wells Fargo
17 5309 Account, including the account number and the routing number.

18 Overt Act No. 384: On or about June 1, 2017, in response to
19 defendant OSUJI's request for a bank account that could receive an
20 approximately \$4,000 fraudulent payment, defendant IGBOKWE sent
21 defendant OSUJI the account information for the Chase 7605 Account,
22 including the name of UICC 1, the account number, and the routing
23 number.

24 Overt Act No. 385: On or about June 2, 2017, defendant IGBOKWE
25 sent defendant ONUDOROGU the account information for the BOA 2660
26 Account, including the account number and the routing number, to use
27 in receiving a fraudulent payment of approximately \$12,593.

1 Overt Act No. 386: On or about June 3, 2017, defendant IGBOKWE
2 sent defendant NWANEGWO the account information for the Chase 7605
3 Account, including the name of UICC 1, the account number, and the
4 routing number, for use in receiving a fraudulent transaction.

5 Overt Act No. 387: On or about June 6, 2017, in response to
6 defendant G. DIKE's request for a bank account that could receive an
7 approximately \$100,000 fraudulent payment, defendant IGBOKWE sent
8 defendant G. DIKE the account information for the BOA 7032 Account,
9 including the account number and the routing number.

10 Overt Act No. 388: On or about June 7, 2017, in response to a
11 request by defendant AZUBUIKE for a bank account that could receive
12 an approximately \$50,000 BEC fraud payment, defendant IGBOKWE sent
13 defendant AZUBUIKE the account information for the Wells Fargo 4216
14 Account, including the account number and the routing number.

15 Overt Act No. 389: On or about June 7, 2017, in response to
16 defendant OFORKA's request for a bank account that could receive an
17 approximately \$5,000 romance scam payment, defendant IGBOKWE sent
18 defendant OFORKA the account information for the Chase 5027 Account,
19 including the account number and the routing number.

20 Overt Act No. 390: On or about June 8, 2017, in response to
21 defendant EZIRIM's request for a bank account that could receive an
22 approximately \$100,000 fraudulent payment, defendant IGBOKWE provided
23 defendant EZIRIM the account information for the Chase 5027 Account,
24 including the account number and the routing number.

25 Overt Act No. 391: On or about June 8, 2017, defendants IRO and
26 OKAFOR discussed the closure of the Wells Fargo 4216 Account.

1 Overt Act No. 392: On or about June 9, 2017, defendant IGBOKWE
2 sent defendant OFORKA the account information for the US Bank 0362
3 Account, including the account number and the routing number.

4 Overt Act No. 393: On or about June 11, 2017, defendant IGBOKWE
5 sent defendant ODIMARA the account information for the Chase 7605
6 Account, including name of UICC 1, the account number, and the
7 routing number.

8 Overt Act No. 394: On or about June 12, 2017, in response to
9 defendant ONYEKA's request for a bank account that could receive a
10 BEC fraud payment, defendant IGBOKWE sent defendant ONYEKA the
11 account information for the BOA 1004 Account, including the account
12 number and the routing number.

13 Overt Act No. 395: On or about June 13, 2017, in response to
14 defendant AWAK's request for a bank account that could receive an
15 approximately \$50,000 romance scam payment, defendant IRO sent
16 defendant AWAK the account information for the BOA 2660 Account,
17 including the account number and the routing number.

18 Overt Act No. 396: On or about June 13, 2017, defendant IGBOKWE
19 sent defendant NWANEGWO the account information for the BOA 2660
20 Account, including the account number and the routing number, to use
21 in receiving a fraudulent payment.

22 Overt Act No. 397: On or about June 15, 2017, in response to
23 defendant OFORKA's request for a bank account that could receive a
24 fraudulent payment of approximately \$18,000, defendant IGBOKWE sent
25 defendant OFORKA the account information for the Chase 5027 Account,
26 including the account number and the routing number.

27 Overt Act No. 398: On or about June 17, 2017, defendant IGBOKWE
28 sent defendant ESHIMBU the account information for the BOA 2660

1 Account, including the account number and the routing number, to use
2 in receiving a fraudulent payment.

3 Overt Act No. 399: On or about June 18, 2017, in response to a
4 request by defendant EGWUMBA for a Chase bank account that could
5 receive an approximately \$2,000,000 fraudulent wire, defendant IRO
6 sent defendant EGWUMBA the account information for the Chase 5027
7 Account, including the account number and the routing number, and
8 told defendant EGWUMBA that the coconspirator conducting the fraud
9 would receive 40% of the proceeds, that the person who opened the
10 bank account would receive 40%, and that defendants IRO and EGWUMBA
11 would split the remaining 20%.

12 Overt Act No. 400: On or about June 18, 2017, in response to
13 defendant OHIRI's request for a bank account that could receive an
14 approximately \$500,000 BEC fraud payment, defendant IGBOKWE sent
15 defendant OHIRI the account information for a Citizens Bank account
16 ending in 7430 (the "Citizens Bank 7430 Account"), including the
17 account number and the routing number.

18 Overt Act No. 401: On or about June 19, 2017, in response to
19 defendant OGANDU's request for a bank account that could receive an
20 approximately \$50,000 romance scam payment, defendant IGBOKWE sent
21 defendant OGANDU the account information for the Chase 7605 Account,
22 including the name of UICC 1, the account number, and the routing
23 number.

24 Overt Act No. 402: On or about June 19, 2017, in response to a
25 request by defendant NWACHUKWU for a bank account that could receive
26 an approximately \$130,000 fraudulent payment, defendant IRO sent
27 defendant NWACHUKWU the account information for the Chase 5027
28 Account, including the account number and the routing number.

1 Overt Act No. 403: On or about June 21, 2017, defendant IRO
2 told defendant NNAMDI that the exchange rate that defendant IRO
3 provided was low given that his money exchangers provided a low
4 exchange rate to him because they helped "clean" the funds.

5 Overt Act No. 404: On or about June 22, 2017, defendant IGBOKWE
6 sent defendant AGWUEGBO the account information for the Wells Fargo
7 5309 Account, including the name of UICC 23, the account number, and
8 the routing number.

9 Overt Act No. 405: On or about June 22, 2017, defendant IGBOKWE
10 sent defendant IWUOHA the account information for the BOA 2660
11 Account, including the account number and the routing number, to use
12 in receiving a fraudulent payment.

13 Overt Act No. 406: On or about June 25, 2017, defendant AGUH
14 told defendant IGBOKWE that he was using the Chase 7605 Account that
15 defendant IGBOKWE had provided to him, including the name of UICC 1,
16 the account number, and the routing number, to use in receiving a
17 fraudulent payment.

18 Overt Act No. 407: On or about June 26, 2017, in response to
19 defendant G. DIKE's request for a MoneyGram account that could
20 receive a fraudulent payment, defendant IGBOKWE sent defendant
21 G. DIKE the name of UICC 1.

22 Overt Act No. 408: On or about June 27, 2017, after defendant
23 OSMUND asked for a bank account that could receive romance scam
24 funds, defendant IGBOKWE sent defendant OSMUND the account
25 information for the Chase 7605 Account, including the account number
26 and the routing number.

27 Overt Act No. 409: On or about June 28, 2017, in response to a
28 request by defendant OGANDU for a bank account that could receive an

1 approximately 43,000 euro BEC payment, defendant IGBOKWE sent
2 defendant OGANDU the account information for the BOA 7032 Account,
3 including the name of UICC 22, the account number, and the routing
4 number; and the Chase 7003 Account, including the account number and
5 the routing number.

6 Overt Act No. 410: On or about June 28, 2017, in response to
7 defendant ONYEKA's request for a bank account that could receive an
8 approximately \$200,000 BEC fraud payment, defendant IGBOKWE sent
9 defendant ONYEKA the account information for a BOA account ending in
10 0307 (the "BOA 0307 Account"), including the account number and the
11 routing number.

12 Overt Act No. 411: On or about June 29, 2017, in response to a
13 request by defendant EGWUMBA for a bank account that could receive a
14 BEC fraud payment, defendant IRO sent defendant EGWUMBA the account
15 information for the US Bank 1789 Account, including the name of
16 UICC 22, the account number, and the routing number.

17 Overt Act No. 412: On or about July 2, 2017, in response to a
18 request by defendant NWACHUKWU for a bank account that could receive
19 an approximately \$3,000 romance scam payment, defendant IRO sent
20 defendant NWACHUKWU the account information for a BOA account ending
21 in 0305 (the "BOA 0305 Account"), including the name of UICC 25, the
22 account number, and the routing number.

23 Overt Act No. 413: On or about July 5, 2017, defendant IRO sent
24 defendant CHIKA the account information for the BOA 3563 Account,
25 including the account number and the routing number, and the account
26 information for the BOA 0305 Account, including the name of UICC 25,
27 the account number, and the routing number, for use in receiving
28 romance scam payments.

1 Overt Act No. 414: On or about July 5, 2017, defendant IRO sent
2 defendant EKI the account information for the BOA 3563 Account,
3 including the account number and the routing number, and the account
4 information for the BOA 0305 Account, including the name of UICC 25,
5 the account number, and the routing number, for use in receiving
6 romance scam payments.

7 Overt Act No. 415: On or about July 6, 2017, in response to a
8 request by defendant AZUBUIKE for a bank account that could receive
9 an approximately \$370,000 payment, defendant IGBOKWE sent defendant
10 AZUBUIKE the account information for four BOA accounts, including the
11 account numbers and the routing numbers.

12 Overt Act No. 416: On or about July 7, 2017, in response to
13 defendant AJAH's request for a bank account that could receive
14 approximately \$15,000 in romance scam payments, defendant IRO sent
15 defendant AJAH the account information for the BOA 0305 Account,
16 including the name of UICC 25, the account number, and the routing
17 number, and the BOA 3563 Account, including the account number and
18 the routing number.

19 Overt Act No. 417: On or about July 8, 2017, defendant IGBOKWE
20 sent defendant IHEJIUREME the account information for a Wells Fargo
21 account ending in 0848, to use in receiving a fraudulent payment.

22 Overt Act No. 418: On or about July 9, 2017, in response to a
23 request by defendant EKECHUKWU for a bank account that could receive
24 a fraudulent wire of approximately \$500,000, defendant IGBOKWE sent
25 defendant EKECHUKWU the account information for the Wells Fargo 5309
26 Account, including the name of UICC 23, the account number, and the
27 routing number.

1 Overt Act No. 419: On or about July 11, 2017, in response to
2 defendant UCHE's request for a bank account that could receive an
3 approximately \$300,000 BEC fraud payment, defendant IGBOKWE sent
4 defendant UCHE the account information for the Wells Fargo 5309
5 Account and then sent him the account information for a Chase account
6 ending in 7003 of UICC 11 (the "Chase 7003 Account").

7 Overt Act No. 420: On or about July 11, 2017, in response to a
8 request by defendant MACWILLIAM CHUKWUOCHA for a bank account that
9 could receive a fraudulent wire of approximately \$280,000, defendant
10 IGBOKWE sent defendant MACWILLIAM CHUKWUOCHA the account information
11 for the Wells Fargo 5309 Account, including the name of UICC 23, the
12 account number, and the routing number.

13 Overt Act No. 421: On or about July 12, 2017, in response to a
14 request by defendant AWAK for a bank account that could receive a
15 fraudulent wire of approximately \$500,000, defendant IRO sent
16 defendant AWAK the account information for the BOA 3563 Account,
17 including the account number and the routing number.

18 Overt Act No. 422: On or about July 12, 2017, defendant EGWUMBA
19 discussed with defendant EROHA how defendant EGWUMBA had been using a
20 computer virus.

21 Overt Act No. 423: On or about July 12, 2017, defendant IRO
22 told defendant EROHA that for receiving and laundering the proceeds
23 of BEC transactions he would charge a rate of 45%-60% and for romance
24 schemes he could charge 20%-25%, and defendant EROHA provided that
25 information to defendant EGWUMBA.

26 Overt Act No. 424: On or about January 12, 2017, defendant
27 IGBOKWE sent defendant IHEJIUREME the name of defendant MANSBANGURA
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1 as the money service account to which defendant IHEJIUREME could
2 direct a fraudulent payment.

3 Overt Act No. 425: On or about July 13, 2017, defendant IGBOKWE
4 sent defendant ESHIMBU the account information for defendant
5 IGBOKWE's BOA account ending in 2673 (the "BOA 2673 Account"),
6 including the account number and the routing number, to use in
7 receiving a fraudulent payment.

8 Overt Act No. 426: On or about July 15, 2017, defendant IGBOKWE
9 sent defendant ODIMARA the account information for a BOA 4560
10 Account, including the account number and the routing number.

11 Additional Transfers to Nigerian Bank Accounts

12 Overt Act No. 427: On or about February 7, 2017, defendant IRO
13 instructed UICC 3 to transfer approximately 28,800,000 naira from his
14 Nigerian bank account to the Nigerian bank account of defendant
15 OGUNGBE, and noted that those funds were to "buy usd."

16 Overt Act No. 428: On or about April 4, 2017, defendant IRO
17 instructed UICC 3 to transfer approximately 3,300,000 naira from his
18 Nigerian bank account to the Nigerian bank account of defendant MBA.

19 Overt Act No. 429: On or about May 8, 2017, defendant OGUNGBE
20 confirmed to defendant IRO that he had paid approximately 5,000,000
21 naira to the Nigerian bank account of UICC 3 on or about April 16,
22 2017.

23 Overt Act No. 430: On or about April 19, 2017, defendant IRO
24 instructed defendant IKOGHO to transfer funds from his Nigerian bank
25 account to the Nigerian bank account of UICC 3 and two other Nigerian
26 bank accounts.

1 Overt Act No. 431: On or about April 24, 2017, defendant IRO
2 instructed defendant IKOGHO to transfer funds from his Nigerian bank
3 account to the Nigerian bank account of UICC 3.

4 Overt Act No. 432: On or about April 25, 2017, defendant IRO
5 instructed defendant IKOGHO to transfer approximately 1,250,510 naira
6 from his Nigerian bank account to the Nigerian bank account of UICC
7 3.

8 Overt Act No. 433: On or about April 25, 2017, defendant IRO
9 instructed defendant IKOGHO to transfer approximately 6,532,000 naira
10 from his Nigerian bank account to the Nigerian bank account of
11 defendant AZUBUIKE.

12 Overt Act No. 434: On or about April 28, 2017, defendant IRO
13 instructed defendant OGUNGBE to transfer approximately \$3,550,000
14 from his Nigerian bank account to the Nigerian bank account of UICC
15 3.

16 Overt Act No. 435: On or about May 3, 2017, defendant IRO
17 instructed UICC 3 to transfer approximately 5,000,000 naira from his
18 Nigerian bank account to the Nigerian bank account of defendant
19 N. DURU.

20 Overt Act No. 436: On or about May 8, 2017, defendant IRO
21 instructed defendant IKOGHO to transfer funds from his Nigerian bank
22 account to the Nigerian bank account of defendant N. DURU.

23 Overt Act No. 437: On or about May 9, 2017, defendant IRO
24 instructed defendant IKOGHO to transfer approximately 26,927,500
25 naira from his Nigerian bank account to the Nigerian bank account of
26 defendant N. DURU.

27 Overt Act No. 438: On or about May 9, 2017, defendant IRO
28 instructed defendant IKOGHO to transfer approximately 11,791,200

1 naira from his Nigerian bank account to the Nigerian bank account of
2 UICC 3.

3 Overt Act No. 439: On or about May 9, 2017, defendant IRO
4 instructed defendant IKOGHO to transfer approximately 1,600,000 naira
5 from his Nigerian bank account to the Nigerian bank account of
6 defendant NNAMDI.

7 Overt Act No. 440: On or about May 9, 2017, defendant IRO
8 instructed defendant IKOGHO to transfer approximately 3,960,000 naira
9 from his Nigerian bank account to the Nigerian bank account of UICC
10 5.

11 Overt Act No. 441: On or about May 9, 2017, defendant IRO
12 instructed defendant IKOGHO to transfer approximately 4,440,200 naira
13 from his Nigerian bank account to the Nigerian bank account of UICC
14 3.

15 Overt Act No. 442: On or about May 13, 2017, defendant IRO
16 instructed defendant IKOGHO to transfer approximately 21,300,000
17 naira from his Nigerian bank account to the Nigerian bank account of
18 UICC 5.

19 Overt Act No. 443: On or about May 15, 2017, defendant IRO
20 instructed UICC 3 to transfer approximately 24,700,000 naira from his
21 Nigerian bank account to the Nigerian bank account of defendant
22 N. DURU.

23 Overt Act No. 444: On or about May 15, 2017, defendant IRO
24 instructed UICC 3 to transfer approximately 742,500 naira from his
25 Nigerian bank account to the Nigerian bank account of defendant AWAK.

26 Overt Act No. 445: On or about May 15, 2017, defendant IRO
27 instructed UICC 3 to transfer approximately 200,000 naira from his
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1 Nigerian bank account to the Nigerian bank account of defendant
2 AZUBUIKE.

3 Overt Act No. 446: On or about May 7, 2017, defendant OGUNGBE
4 confirmed to defendant IRO that he had paid approximately 5,000,000
5 naira to the Nigerian bank account of UICC 3.

6 Overt Act No. 447: On or about July 12, 2017, defendants IRO
7 and OGUNGBE discussed a transfer of approximately 2,626,500 to the
8 Nigerian bank account of defendant AJAH.

COUNT TWO

[18 U.S.C. § 1349]

[ALL DEFENDANTS]

21. The Grand Jury re-alleges and incorporates paragraphs 1 through 16 of the Introductory Allegations of this Indictment here.

A. OBJECTS OF THE CONSPIRACY

22. Beginning on a date unknown to the Grand Jury, but no later than October 7, 2014, and continuing through an unknown date, but no earlier than on or about May 2, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendants IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA, XPLOA G, OCHIAGHA, N. DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA, OHAJIMKPO, UCHE, ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM CHUKWUOCHA, UZOKA, AWAK, EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA, IKEWESI, OGANDU, ANYANWU, AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI, ONYEKA, ANUNOBI, OKOLO, ONUWA, ISAMADE, MADUFOR, NNEBEDUM, OKEREKE, ODIMARA, ONUDOROGU, NZENWAH, OBASI, AGUBE, OKORIE, OHIRI, UGWU, AGWUEGBO, CHUKWU, MEGWA, P. DURU, IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE, AGUNWA, G. DIKE, UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR, UBASINEKE, IBETO, NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, IHEJIUREME, and MADEKWE, together with UICC 1 through UICC 26 and others known and unknown to the Grand Jury, knowingly conspired to commit the following offenses:

a. wire fraud, in violation of Title 18, United States Code, Section 1343;

b. mail fraud, in violation of Title 18, United States Code, Section 1341; and

1 c. bank fraud, in violation of Title 18, United States
2 Code, Section 1344(2).

3 B. THE MANNER AND MEANS OF THE CONSPIRACY

4 23. The objects of the conspiracy were to be accomplished, in
5 substance, as follows:

6 a. Defendants UMEJESI, OGUNGBE, EKECHUKWU, XPLOA G,
7 OCHIAGHA, N. DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA,
8 OHAJIMKPO, UCHE, ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM
9 CHUKWUOCHA, UZOKA, AWAK, EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA,
10 IKEWESI, OGANDU, ANYANWU, AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI,
11 ONYEKA, ANUNOBI, OKOLO, ONUWA, ISAMADE, MADUFOR, NNEBEDUM, OKEREKE,
12 ODIMARA, ONUDOROGU, NZENWAH, OBASI, AGUBE, OKORIE, OHIRI, UGWU,
13 AGWUEGBO, CHUKWU, MEGWA, IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE,
14 AGUNWA, G. DIKE, UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR,
15 UBASINEKE, IBETO, NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, and
16 IHEJIUREME, or their coconspirators, would identify a potential
17 victim of a BEC fraud, escrow fraud, romance scam, or other
18 fraudulent scheme.

19 i. As to a potential BEC fraud and escrow fraud
20 victim, this would be done in part by hacking into the email system
21 of either the potential BEC fraud victim or a party with whom the
22 potential BEC fraud victim was communicating, intercepting
23 communications, and directly communicating with the potential victim.

24 ii. As to a potential romance scam victim, this would
25 be done by employing false and fraudulent personas to virtually meet
26 a potential victim on online dating or social media platforms and
27 attempting to cultivate relationships such that the potential victim
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1 would incorrectly believe herself or himself to be in a relationship
2 or to be friends with the false and fraudulent persona.

3 b. The Grand Jury re-alleges and incorporates paragraphs
4 19.a through 19.i of Section B of Count One of this Indictment here.

5 C. OVERT ACTS

6 24. In furtherance of the conspiracy, and to accomplish its
7 objects, defendants IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, CATHEY,
8 MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA, XPLORA G, OCHIAGHA, N.
9 DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA, OHAJIMKPO, UCHE,
10 ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM CHUKWUOCHA, UZOKA, AWAK,
11 EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA, IKEWESI, OGANDU, ANYANWU,
12 AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI, ONYEKA, ANUNOBI, OKOLO, ONUWA,
13 ISAMADE, MADUFOR, NNEBEDUM, OKEREKE, ODIMARA, ONUDOROGU, NZENWAH,
14 OBASI, AGUBE, OKORIE, OHIRI, UGWU, AGWUEGBO, CHUKWU, MEGWA, P. DURU,
15 IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE, AGUNWA, G. DIKE,
16 UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR, UBASINEKE, IBETO,
17 NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, IHEJIUREME, and MADEKWE,
18 together with other known and unknown to the Grand Jury, on or about
19 the dates set forth below, committed and caused to be committed
20 various overt acts, in the Central District of California and
21 elsewhere, including, but not limited to, the following:

22 Overt Act Nos. 1-447: The Grand Jury re-alleges and
23 incorporates Overt Act Number 1 through Overt Act Number 447 of
24 Section C of Count One of this Indictment here.

1 COUNT THREE

2 [18 U.S.C. § 1349]

3 [DEFENDANTS IRO, ONWUASOANYA, AND IZUNWANNE]

4 25. The Grand Jury re-alleges and incorporates paragraphs 1 and
5 8 of the Introductory Allegations of this Indictment here.

6 A. OBJECTS OF THE CONSPIRACY

7 26. Beginning on a date unknown to the Grand Jury, but no later
8 than September 1, 2014, and continuing through an unknown date, but
9 no earlier than on or about September 11, 2014, in Los Angeles
10 County, within the Central District of California, and elsewhere,
11 defendants IRO, ONWUASOANYA, and IZUNWANNE, together with others
12 known and unknown to the Grand Jury, knowingly conspired to commit
13 wire fraud, in violation of Title 18, United States Code, Section
14 1343.

15 B. THE MANNER AND MEANS OF THE CONSPIRACY

16 27. The object of the conspiracy was to be accomplished, in
17 substance, as follows:

18 a. Defendants ONWUASOANYA, IZUNWANNE, or their
19 coconspirators, would identify a potential victim of BEC fraud. This
20 would be done in part by hacking into the email system of either the
21 potential BEC fraud victim or a party with whom the potential BEC
22 fraud victim was communicating, intercepting communications, and
23 directly communicating with the potential victims.

24 b. Defendants ONWUASOANYA, IZUNWANNE, or their
25 coconspirators, would through false and fraudulent pretenses,
26 representations, and promises, and concealment of material facts,
27 persuade a victim to wire funds into a bank account.

1 c. Defendants ONWUASOANYA, IZUNWANNE, IRO, and their
2 coconspirators, would also make false and fraudulent statements,
3 representations, and promises, and conceal material facts, in order
4 to avoid discovery of the fraudulent nature of the deposit, wire, or
5 transfer.

6 d. Defendants ONWUASOANYA, IZUNWANNE, or their
7 coconspirators would withdraw, and attempt to withdraw, the
8 fraudulently-obtained funds from a bank account before the victim
9 became aware of the fraudulent nature of the transactions, so as to
10 obtain the money and so as to conceal and disguise the nature,
11 location, source, ownership and control of the proceeds.

12 C. OVERT ACTS

13 Overt Act No. 1: On or about September 3, 2014, an unknown
14 coconspirator fraudulently induced Victim Company 1 to send a wire
15 transfer of approximately \$45,783.97 from its City National Bank
16 account in San Diego County, California, to a fraudulent bank account
17 at HSBC ending in 6100.

18 Overt Act No. 2: On or about September 11, 2014, prior to
19 Victim Company 1 discovering that it had been defrauded, defendant
20 ONWUASOANYA arranged for defendant IRO to impersonate an employee of
21 Victim Company 1 when speaking to a Chinese representative of Victim
22 Company 1, in order to avoid having the fraudulent scheme be
23 detected.

24 Overt Act No. 3: On or about September 11, 2014, prior to
25 Victim Company 1 discovering that it had been defrauded, defendant
26 IZUNWANNE provided information to IRO so that defendant IRO could
27 impersonate an employee of Victim Company 1 when speaking to a
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Chinese representative of Victim Company 1, in order to avoid having
the fraudulent scheme be detected.

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executing and attempting to execute the above-described schemes to defraud, transmitted and caused the transmission of the following items by means of wire communication in interstate and foreign commerce:

COUNT	DEFENDANT(S)	DATE	ITEM WIRED
Scheme as to Victim M.S.			
4	IRO and OGBONNA	9/3/2015	Wire transfer of approximately \$23,000 from the BOA account of M.S., held in Monterey Park, California, through interstate wires, to Chase checking account ending in 9837 of defendant IRO, doing business as ("dba") "VOI Enterprises," held in Carson, California (the "Chase 9837 Account")
5	IRO and OGBONNA	9/8/2015	Wire transfer of approximately \$46,500 from the BOA account of M.S., held in Monterey Park, California, through interstate wires, to the Chase 9837 Account
6	IRO and OGBONNA	9/10/2015	Wire transfer of approximately \$4,700 from the BOA account of M.S., held in Monterey Park, California, through interstate wires, to the Chase 9837 Account
7	IRO and OGBONNA	9/14/2015	Wire transfer of approximately \$17,000 from the BOA account of M.S., held in Monterey Park, California, through interstate wires, to the Chase 9837 Account
Scheme as to Victim Company 2			
8	IRO	2/12/2016	Wire transfer of approximately \$186,686 from the United Bank of Africa account of Victim Company 2, through interstate wires, to the Chase 9837 Account

Scheme as to Victim R.B.			
9	IRO, ODIONYENMA, and AWAK	3/31/2016	Wire transfer of approximately \$18,000 from a Wells Fargo account of R.B., held in Panama City Beach, Florida, to a bank account at Comerica ending in 2663 of defendant IRO, dba "IRVA Auto Sales & Equip Broker LLC," held in Carson, California ("Comerica 2663 Account")
10	IRO, ODIONYENMA, and AWAK	4/4/2016	Wire transfer of approximately \$39,000 from a Wells Fargo account of R.B., held in Panama City Beach, Florida, to the Comerica 2663 Account
11	IRO, ODIONYENMA, and AWAK	4/7/2016	Wire transfer of approximately \$30,000 from a Wells Fargo account of R.B., held in Panama City Beach, Florida, to a Wells Fargo account ending in 7410
Scheme as to Victim F.K.			
12	IGBOKWE, MANSBANGURA, and ANUNOBI	5/30/2016	Wire transfer of approximately \$6,824 from a bank account in Japan to a Chase account ending in 1577 of UICC 2, held in Los Angeles, California
13	IGBOKWE, MANSBANGURA, and ANUNOBI	7/13/2016	Wire transfer of approximately \$33,128.26 from a bank account in Japan to a Chase account ending in 0655 of UICC 1
Scheme as to Victim J.G.			
14	IGBOKWE and MANSBANGURA	10/26/2016	Wire transfer of approximately \$30,000 from a Heritage Bank of Nevada account to a US Bank account ending in 2669 of UICC 1, held in Los Angeles, California
Scheme as to Victim Company 3			
15	IGBOKWE and MANSBANGURA	12/19/2016	Wire transfer of approximately \$18,457.13 from Chase account of Victim Company 3, held in Oklahoma, to a US Bank account ending in 2982 of UICC 2, held in Los Angeles, California

Scheme as to Victim B.Z.			
16	IGBOKWE, MANSBANGURA, and ONUWA	3/16/2017	Wire transfer of approximately \$11,900 from a Chemical Bank account of B.Z., held in Michigan, to a Chase account ending in 7605 of UICC 1, in Los Angeles, California (the "Chase 7605 Account")
Scheme as to Victim Company 4			
17	IGBOKWE, UMEJESI, and OJIMBA	3/29/2017	Wire transfer of approximately \$29,679.17 from a Banco Bilbao Vizcaya Argentaria, S.A. account of Victim Company 4, held in Colombia, to a Wells Fargo account ending in 7245 of UICC 9, held in Whittier, California
Scheme as to Victim A.V.			
18	IGBOKWE, CHILAKA, and MANSBANGURA	4/11/2017	Wire transfer of approximately \$8,035 from a Capital One account of A.V., held in Maryland, to a Wells Fargo account ending in 1147 of UICC 24, in Los Angeles, California
19	IGBOKWE, CHILAKA, and MANSBANGURA	4/27/2017	Wire transfer of approximately \$2,700 from a Capital One account of A.V., held in Maryland, to a Chase account ending in 5027 of UICC 1, which account was held in Los Angeles, California (the "Chase 5027 Account")
20	IGBOKWE, CHILAKA, and MANSBANGURA	5/1/2017	Wire transfer of approximately \$3,360 from a Capital One account of A.V., held in Maryland, to the Chase 5027 Account
Scheme as to Victims Je.F. and Jo.F.			
21	IRO, EKECHUKWU, AZUBUIKE, and ANOZIE	4/17/2017	Wire transfer of approximately \$135,800 from a BMO Harris Bank account of Je.F. and Jo.F., held in Illinois, to a Chase account ending in 6217 of UICC 24, held in Hawthorne, California

Scheme as to Victim Company 6			
22	IRO, CATHEY, and NNAMDI	4/10/2017	Message from defendant NNAMDI requesting that defendant IRO open a bank account in the name of a Chinese company ("Chinese Company 1"), related to an approximately \$900,000 wire transfer to be fraudulently-obtained from Victim Company 6
Scheme as to Victim Company 7			
23	IRO and ANOZIE	4/21/2017	Wire transfer of approximately \$23,789 from a BOA account of Victim Company 7, held in North Carolina, to a Chase checking account ending in 7866 of UICC 25, held in Carson, California
Scheme as to Victim D.J.			
24	IGBOKWE, ODIONYENMA, MANSBANGURA, and P. DURU	5/5/2017	Photo of a deposit receipt sent by defendant ODIONYENMA to defendant IGBOKWE, from the deposit of a money order of approximately \$25,600 from a Wells Fargo branch in Minnesota, by D.J., into a Wells Fargo account ending in 4899 of defendant P. DURU
Scheme as to Victim L.B.			
25	IRO, AWAK, and IGBOKWE	5/9/2017	Wire transfer of approximately \$3,000 from a Wells Fargo account of L.B., held in Alabama, to a BOA account ending in 2660 of defendant IGBOKWE, held in Los Angeles, California
Scheme as to Victim Company 9			
26	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/10/2017	Wire transfer of approximately \$220,462.68 from a First Caribbean International Bank account of Victim Company 9, held in St. Vincent, to a BOA account ending in 1004 of UICC 11, held in Northridge, California

Scheme as to Victim Law Firm			
27	IRO, IGBOKWE, CATHEY, and OCHIAGHA	5/11/2017	Wire transfer of approximately \$83,140.98 from a SunTrust account of the Victim Law Firm, held in North Carolina, to a Chase account ending in 5899, held in Los Angeles, California
Scheme as to Victim D.V.			
28	IGBOKWE and MANSBANGURA	5/13/2017	Payment of approximately \$500 by D.V. via Western Union to the account of UICC 1, in Los Angeles, California
29	IGBOKWE and MANSBANGURA	5/15/2017	Payment of approximately \$500 by D.V. via Western Union to the account of UICC 1, in Los Angeles, California
Scheme as to Victim Company 10			
30	IRO, IGBOKWE, CATHEY, and OCHIAGHA	5/17/2017	Wire transfer of approximately \$301,201.20 from a China Merchants Bank account of Victim Company 10, held in China, to a Chase account ending in 7262 of UICC 12, held in Inglewood, California
Scheme as to Victim T.P.			
31	IRO, CATHEY, NNAMDI, and OGUNGBE	6/5/2017	Wire transfer of approximately \$64,554 from a HSBC bank account used by T.P., held in Hong Kong, to a Chase account ending in 7522, held in Los Angeles, California
Scheme as to Victim Company 11			
32	IRO, IKOGHO, UMEJESI, CATHEY, EROHA, and XPLORA G	6/13/2017	Wire transfer of approximately \$297,617.11 from an Arab Bank PLC account of Victim Company 11, held in Lebanon, to a BOA account ending in 4180, of UICC 12, held in Inglewood, California
33	IRO, IKOGHO, UMEJESI, CATHEY, EROHA, and XPLORA G	6/22/2017	Wire transfer of approximately \$297,617.11 from an Arab Bank PLC account of Victim Company 11, held in Lebanon, to a Wells Fargo account ending in 7984 of UICC 13, held in Inglewood, California

Scheme as to Victim B.P.			
34	IGBOKWE, MANSBANGURA, and AGUNWA	6/23/2017	Wire transfer of approximately \$750 from a First Hawaiian Bank account of B.P., held in Hawaii, to the Chase 7605 Account
35	IGBOKWE, MANSBANGURA, and AGUNWA	6/27/2017	Wire transfer of approximately \$1,500 from a First Hawaiian Bank account of B.P., held in Hawaii, to the Chase 7605 Account
36	IGBOKWE, MANSBANGURA, and AGUNWA	7/13/2017	Wire transfer of approximately \$2,550 from a First Hawaiian Bank account of B.P., held in Hawaii, to the Chase 7605 Account
Scheme as to Victim Solicitor Firm			
37	IRO, IGBOKWE, IKOGHO, CATHEY, and OCHIAGHA	6/22/2017	Wire transfer of approximately \$199,960 from a Lloyds Bank account of Victim Solicitor Firm, held in the United Kingdom, to a Chase account ending in 7633 of UICC 14, held in Culver City, California
Scheme as to Victim Company 12			
38	IRO, CATHEY, and XPLORA G	5/30/2017	Account information, including the account number and routing number, for a Chase account ending in 6679 sent by defendant IRO to defendant XPLORA G
Scheme as to Victim D.A.			
39	IGBOKWE, MANSBANGURA, and NWANGWU	6/16/2017	Wire transfer of approximately \$500 from a Capital City Bank account of a Kansas company, held in Kansas, to the Chase 5027 Account
Scheme as to Victim M.G.			
40	IRO, IGBOKWE, EROHA, and MACWILLIAM CHUKWUOCHA	7/6/2017	Wire transfer of approximately \$11,000 from an HSBC account of M.G., held in Mexico, to a BOA account ending in 3563 of defendant EROHA, held in Inglewood, California (the "BOA 3563 Account")
41	IRO, IGBOKWE, EROHA, and MACWILLIAM CHUKWUOCHA	7/17/2017	Wire transfer of approximately \$5,000 from an HSBC account of M.G., held in Mexico, to the BOA 3563 Account

42	IRO, IGBOKWE, AJAEZE, and MACWILLIAM CHUKWUOCHA	12/15/2017	Wire transfer of approximately \$5,500 from an HSBC account of M.G., held in Mexico, to a BOA account ending in 3349 of defendant AJAEZE in Harbor City, California (the "BOA 3349 Account")
43	IRO, IGBOKWE, AJAEZE, and MACWILLIAM CHUKWUOCHA	12/22/2017	Wire transfer of approximately \$2,000 from an HSBC account of M.G., held in Mexico, to the BOA 3349 Account
44	IRO, IGBOKWE, AJAEZE, and MACWILLIAM CHUKWUOCHA	5/2/2018	Wire transfer of approximately \$11,000 from an HSBC account of M.G., held in Mexico, to a US Bank account ending in 2910 of defendant AJAEZE, held in Inglewood, California
Scheme as to Victim Company 13			
45	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/3/2017	Wire transfer of approximately \$382,295 from an Abu Dhabi Commercial Bank of Victim Company 13, held in Dubai, to a Chase account ending in 5092 of UICC 16, held in Hawthorne, California (the "Chase 5092 Account")
Scheme as to Victim Company 14			
46	IRO and AJAEZE	1/18/2018	Wire transfer of approximately \$76,688.99 from Commerzbank AG account of Victim Company 14, held in Germany, to a Chase account ending in 0038 of defendant AJAEZE, held in Carson, California (the "Chase 0038 Account")
47	IRO and AJAEZE	1/30/2018	Wire transfer of approximately \$39,004.47 from Commerzbank AG account of Victim Company 14, held in Germany, to the Chase 0038 Account
Scheme as to Victim Company 15			
48	IRO, IKOGHO, and AJAEZE	2/14/2018	Wire transfer of approximately \$886,950 from a PT Bank Mandiri Tbk account, held in Indonesia, to the Chase 0038 Account

Scheme as to Victim Company 16			
49	IRO and AJAEZE	2/15/2018	Wire transfer of approximately \$1,750,000 from a National Westminster Bank PLC account, held in the United Kingdom, to a Wells Fargo account ending in 1849 of defendant AJAEZE, held in Carson, California

COUNTS FIFTY AND FIFTY-ONE

[18 U.S.C. §§ 1344(2); 2(a)]

[DEFENDANTS IRO, IGBOKWE, AND MANSBANGURA]

32. The Grand Jury re-alleges and incorporates paragraphs 1, 2, and 13 of the Introductory Allegations of this Indictment here.

A. THE SCHEME TO DEFRAUD

33. Beginning on an unknown date, but no later than on or about February 17, 2017, and continuing through on or about June 21, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants IRO, IGBOKWE, and MANSBANGURA, together with others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly and with intent to defraud, executed, and attempted to execute a scheme to obtain moneys, funds, credits, assets, and other property owned by and under the custody and control of Wells Fargo by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

34. The fraudulent scheme operated, in substance, in the following manner:

a. Defendant IRO would instruct defendant IGBOKWE to have defendant MANSBANGURA and UICC 1 open a bank account in the name of Victim Company 5.

b. Defendant IGBOKWE would relay to defendant MANSBANGURA defendant IRO's request to open a bank account in the name of Victim Company 5.

c. Defendant MANSBANGURA would cause to be filed with the Los Angeles County Registrar-Recorder/County Clerk's Office a Fictitious Business Name Statement similar to the name of Victim Company 5.

d. Defendant MANSBANGURA would cause to be opened a bank account in the name of UICC 1, with the business name of the bank account similar to that of Victim Company 5.

e. Defendant MANSBANGURA would provide the bank account information, including the name of UICC 1, the account number, and the routing number, to defendant IGBOKWE who, in turn, would provide it to defendant IRO.

f. Unknown coconspirators would send or cause to be sent to Wells Fargo a forged and fraudulent request purporting to be from Victim Company 5, requesting that Wells Fargo close the bank account of Victim Company 5 held at Wells Fargo and transfer the balance of the account to the bank account opened in the name of UICC 1.

B. EXECUTION OF THE FRAUDULENT SCHEME

35. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendants IRO, IGBOKWE, and MANSBANGURA, together with others known and unknown to the Grand Jury, each aiding and abetting the other, committed the following acts, each of which constituted an execution of the fraudulent scheme:

COUNT	DATE	ACT
50	3/29/17	An unknown coconspirator caused to be sent to Wells Fargo a forged and fraudulent request purporting to be from Victim Company 5, requesting that Victim Company 5's account at Wells Fargo be closed and that the balance, which was approximately \$17,300,844.58 at the time, be transferred to a Chase account ending in 5027 of UICC 1, which defendants IRO, IGBOKWE, and MANSBANGURA caused to be opened and which account was held in Los Angeles, California (the "Chase 5027 Account")

51	6/3/2017	An unknown coconspirator caused to be sent to Wells Fargo a forged and fraudulent request purporting to be from Victim Company 5, requesting that Victim Company 5's account at Wells Fargo be closed and that the balance, which was approximately \$12,760,922.93 at the time, be transferred to the Chase 5027 Account, which defendants IRO, IGBOKWE, and MANSBANGURA caused to be opened
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COUNTS FIFTY-TWO THROUGH ONE HUNDRED TWENTY-THREE

[18 U.S.C. §§ 1956(a)(1)(B)(i); 2(a)]

[DEFENDANTS IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA, OCHIAGHA, OGBONNA, MACWILLIAM CHUKWUOCHA, UZOKA, AWAK, SAM MAL, ONUWA, AND ANOZIE]

36. The Grand Jury re-alleges and incorporates paragraphs 1 through 16 of the Introductory Allegations of this Indictment here.

37. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, the following defendants and others known and unknown to the Grand Jury, each aiding and abetting the other, conducted and attempted to conduct the financial transactions described below affecting interstate and foreign commerce, knowing that the property involved represented the proceeds of some form of unlawful activity, and which transactions, in fact, involved the proceeds of specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343; and mail fraud, in violation of Title 18, United States Code, Section 1341; and bank fraud, in violation of Title 18, United States Code, Section 1344(2), and knowing that each of the transactions was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of such proceeds:

COUNT	DEFENDANT (S)	DATE	TRANSACTION
52	IRO and OGBONNA	9/4/2015	Withdrawal of approximately \$14,000 from the Chase checking account ending in 9837 of defendant IRO, doing business as ("dba") "VOI Enterprises," held in Carson, California (the "Chase 9837 Account")
53	IRO and OGBONNA	9/8/2015	Withdrawal of approximately \$8,000 from the Chase 9837 Account

54	IRO and OGBONNA	9/10/2015	Withdrawal of approximately \$30,000 from the Chase 9837 Account
55	IRO and OGBONNA	9/10/2015	Withdrawal of approximately \$9,000 from the Chase 9837 Account
56	IRO and OGBONNA	9/17/2015	Withdrawal of approximately \$10,000 from the Chase 9837 Account
57	IRO and OGBONNA	9/17/2015	Withdrawal of approximately \$20,000 from the Chase 9837 Account
58	IRO and OGBONNA	9/17/2015	Withdrawal of approximately \$5,000 from the Chase 9837 Account
59	IRO	2/12/2016	Transfer of approximately \$188,600 from the Chase 9837 Account to a Chase savings account ending in 0820 of defendant IRO, dba VOI Enterprises, held in Carson, California ("Chase 0820 Account")
60	IRO	2/12/2016	Transfer of approximately \$161,700 from the Chase 0820 Account to the Chase 9837 Account
61	IRO	2/16/2016	Wire transfer of approximately \$132,950 from the Chase 9837 Account to a Wells Fargo account ending in 6061 of defendant IRO, dba "Irva Auto Sales & Equip Broker LLC," held in Carson, California ("Wells Fargo 6061 Account")
62	IRO	2/16/2016	Wire transfer of approximately \$28,670 from the Chase 9837 Account to the bank account ending in 3107 of UICC 7 at CalCom FCU, held in Torrance, California ("CalCom 3107 Account")
63	IRO	2/16/2016	Wire transfer of approximately \$27,500 from the CalCom 3107 Account to the Wells Fargo 6061 Account
64	IRO	2/16/2016	Wire transfer of approximately \$50,000 from the Wells Fargo 6061 Account to a BOA account ending in 1824
65	IRO	2/16/2016	Withdrawal of approximately \$50,000 from the Wells Fargo 6061 Account
66	IRO	2/18/2016	Wire transfer of approximately \$30,500 from the Wells Fargo 6061 Account to a Chase account ending in 1279 of UICC 8
67	IGBOKWE and MANSBANGURA	10/28/2016	Withdrawal of approximately \$5,500 from a US Bank account ending in 2669 of UICC 1, held in Los Angeles, California (the "US Bank 2669 Account"), through check addressed to defendant MANSBANGURA
68	IGBOKWE and MANSBANGURA	10/28/2016	Withdrawal of approximately \$8,845 from the US Bank 2669 Account, through check addressed to UICC 2

69	IGBOKWE and MANSBANGURA	10/31/2016	Withdrawal of approximately \$7,580 from the US Bank 2669 Account, through check addressed to UICC 2
70	IGBOKWE and MANSBANGURA	11/1/2016	Withdrawal of approximately \$7,500 from the US Bank 2669 Account, through check addressed to defendant MANSBANGURA
71	IGBOKWE and MANSBANGURA	12/20/2016	Withdrawal of approximately \$8,500 from a US Bank account ending in 2982 of UICC 2, held in Los Angeles, California ("US Bank 2982 Account")
72	IGBOKWE, MANSBANGURA, and ONUWA	3/16/2017	Withdrawal of approximately \$4,000 from a Chase account ending in 7605 of UICC 1, in Los Angeles, California (the "Chase 7605 Account"), through a check for "Rent"
73	IGBOKWE, UMEJESI, and OJIMBA	3/31/2017	Withdrawal of approximately \$11,160 from a Wells Fargo account ending in 7245 of UICC 9, held in Whittier, California (the "Wells Fargo 7245 Account"), through a check addressed to defendant UMEJESI
74	IGBOKWE, UMEJESI, and OJIMBA	3/31/2017	Withdrawal of approximately \$16,520 from the Wells Fargo 7245 Account, through a check addressed to defendant OJIMBA
75	IRO and ANOZIE	4/21/2017	Transfer of approximately \$2,700 from a Chase checking account ending in 7866 of UICC 25, held in Carson, California (the "Chase 7866 Account") to a Chase savings account ending in 9927 of UICC 25, held in Carson, California (the "Chase 9927 Account")
76	IRO and ANOZIE	4/24/2017	Wire transfer of approximately \$18,598 from the Chase 7866 Account to a SunTrust account of "B&B Motors of Tampa Bay Inc."
77	IRO and ANOZIE	4/24/2017	Withdrawal of approximately \$500 from the Chase 7866 Account
78	IRO and ANOZIE	4/25/2017	Wire transfer of approximately \$1,450 from the Chase 7866 Account to a U.S. Bank account ending in 0953
79	IRO, IGBOKWE and AWAK	6/7/2017	Payment of approximately \$1,225 from a BOA account ending in 2660 of defendant IGBOKWE, held in Los Angeles, California (the "BOA 2660 Account") to U.S. Citizenship and Immigration services for defendant IGBOKWE's application for lawful permanent residence

80	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/11/2017	Wire transfer of approximately \$60,000 from a BOA account ending in 1004 of UICC 11, held in Northridge, California (the "BOA 1004 Account") to a BOA account ending in 5283, held in Paramount, California (the "BOA 5283 Account")
81	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/12/2017	Wire transfer of approximately \$75,500 from the BOA 1004 Account to a BOA account ending in 9405, held in Bellingham, Massachusetts (the "BOA 9405 Account")
82	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/15/2017	Withdrawal of a cashier's check of approximately \$21,000, addressed to defendant UMEJESI, from the BOA 1004 Account
83	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/15/2017	Purchase of a cashier's check of approximately \$9,500, addressed to defendant IGBOKWE, from the BOA 1004 Account
84	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/15/2017	Wire transfer of approximately \$30,000 from the BOA 1004 Account to the BOA 9405 Account
85	IGBOKWE and MANSBANGURA	5/15/2017	Withdrawal of approximately \$500 from the Western Union account of UICC 1, in Los Angeles, California
86	IGBOKWE and MANSBANGURA	5/15/2017	Withdrawal of approximately \$500 from the Western Union account of UICC 1, in Los Angeles, California
87	IRO, OGUNGBE, CATHEY, and NNAMDI	6/6/2017	Withdrawal of approximately \$8,500 from a Chase account ending in 7522, held in Los Angeles, California (the "Chase 7522 Account")
88	IRO, OGUNGBE, CATHEY, and NNAMDI	6/7/2017	Withdrawal of approximately \$7,100 from the Chase 7522 Account
89	IRO, OGUNGBE, CATHEY, and NNAMDI	6/7/2017	Wire transfer of approximately \$47,000 from the Chase 7522 Account to a Citibank account of a Hong Kong company

90	IRO, IGBOKWE, IKOGHO, CATHEY, and OCHIAGHA	6/23/2017	Withdrawal of approximately \$43,750 from a Chase account ending in 7633 of UICC 14, held in Culver City, California ("Chase 7633 Account"), through check deposited to a Chase account ending in 6781 of UICC 15 in Los Angeles, California ("Chase 6781 Account")
91	IRO, IGBOKWE, IKOGHO, CATHEY, and OCHIAGHA	6/26/2017	Withdrawal of approximately \$9,150 from the Chase 7633 Account through a cashier's check
92	IRO, IGBOKWE, AJAEZE, EROHA, and MACWILLIAM CHUKWUOCHA	7/10/2017	Wire transfer of approximately \$6,000 from a BOA account ending in 3563 of defendant EROHA, held in Inglewood, California (the "BOA 3563 Account") to a Wells Fargo account ending in 5736 of defendant MACWILLIAM CHUKWUOCHA, held in Orlando, Florida (the "Wells Fargo 5736 Account")
93	IRO, IGBOKWE, AJAEZE, EROHA, and MACWILLIAM CHUKWUOCHA	7/11/2017	Wire transfer of approximately \$2,800 from the BOA 3563 Account to the Wells Fargo 5736 Account
94	IRO, IGBOKWE, AJAEZE, EROHA, and MACWILLIAM CHUKWUOCHA	7/17/2017	Withdrawal of approximately \$5,000 from the BOA 3563 Account
95	IRO, IGBOKWE, AJAEZE, EROHA, and MACWILLIAM CHUKWUOCHA	7/17/2017	Deposit of approximately \$4,150 to the Wells Fargo 5736 Account
96	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/5/2017	Withdrawal of approximately \$47,606.40 from a Chase account ending in 5092 of UICC 16, held in Hawthorne, California (the "Chase 5092 Account") through a cashier's check
97	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/5/2017	Withdrawal of approximately \$52,602 from the Chase 5092 Account through a cashier's check

98	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/7/2017	Withdrawal of approximately \$65,965 from the Chase 5092 Account through a cashier's check
99	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/8/2017	Withdrawal of approximately \$35,000 from the Chase 5092 Account through a cashier's check
100	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/9/2017	Withdrawal of approximately \$35,000 from the Chase 5092 Account through a cashier's check
101	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/10/2017	Withdrawal of approximately \$35,000 from the Chase 5092 Account through a cashier's check
102	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/10/2017	Wire transfer of approximately \$60,000 from the Chase 5092 Account to the BOA 2660 Account
103	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/15/2017	Wire transfer of approximately \$54,600 from the BOA 2660 Account to a Chase account ending in 9931 of OGUNGBE, dba "P and P Motors LLC," held in Santa Fe Springs, California.
104	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/15/2017	Deposit of a cashier's check of approximately \$35,000, issued from Chase 5092 Account, into a Chase account ending in 5812 of UICC 16, held in Inglewood, California ("Chase 5812 Account")

105	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/22/2017	Deposit of a cashier's check of approximately \$35,000, issued from the Chase 5092 Account, into the Chase 5812 Account
106	IRO and AJAEZE	1/19/2018	Wire transfer of approximately \$27,455 from a Chase account ending in 0038 of defendant AJAEZE, held in Carson, California (the "Chase 0038 Account"), to a Wells Fargo account in the name "Cadon Auto Corporation"
107	IRO and AJAEZE	1/19/2018	Wire transfer of approximately \$51,865 from the Chase 0038 Account to a Mashreqbank PSC account, held in the United Arab Emirates, in the name "Elite Auto Fze"
108	IRO and AJAEZE	1/22/2018	Withdrawal of approximately \$500 from the Chase 0038 Account from an ATM in Los Angeles, California
109	IRO and AJAEZE	1/23/2018	Withdrawal of approximately \$500 from the Chase 0038 Account from an ATM in Carson, California
110	IRO and AJAEZE	1/30/2018	Withdrawal of approximately \$500 from the Chase 0038 Account from an ATM in Los Angeles, California
111	IRO and AJAEZE	1/31/2018	Wire transfer of approximately \$19,000 from the Chase 0038 Account to a PNC Bank account of The George Washington University to pay the Spring 2018 tuition of a student
112	IRO and AJAEZE	2/1/2018	Purchase of a cashier's check of approximately \$12,793 from the Chase 0038 Account
113	IRO and AJAEZE	2/5/2018	Withdrawal of approximately \$2,000 from the Chase 0038 Account from a Chase bank branch in Carson, California
114	IRO and AJAEZE	2/5/2018	Withdrawal of approximately \$500 from the Chase 0038 Account from an ATM in Carson, California
115	IRO, IKOGHO, and AJAEZE	2/15/2018	Wire transfer of approximately \$84,985 from the Chase 0038 Account to a BOA account ending in 5903
116	IRO, IKOGHO, and AJAEZE	2/16/2018	Wire transfer of approximately \$189,000 from the Chase 0038 Account to a Compass Bank account ending in 3681 of defendant IKOGHO, held in Lynwood, California (the "Compass Bank 3681 Account")
117	IRO, IKOGHO, and AJAEZE	2/16/2018	Check of approximately \$8,000 negotiated from the Compass Bank 3681 Account

118	IRO, IKOGHO, and AJAEZE	2/16/2018	Purchase of cashier's check of approximately \$35,000 from the Compass Bank 3681 Account
119	IRO, IKOGHO, and AJAEZE	2/16/2018	Withdrawal of approximately \$8,000 from the Chase 0038 Account from a Chase bank branch in Carson, California
120	IRO, IKOGHO, and AJAEZE	2/17/2018	Withdrawal of approximately \$500 from the Chase 0038 Account from an ATM in Los Angeles, California
121	IRO and AJAEZE	2/16/2018	Wire transfer of approximately \$200,000 from a Wells Fargo account ending in 1849 of defendant AJAEZE, held in Carson, California (the "Wells Fargo 1849 Account") to a Wells Fargo account ending in 7748 of defendant AJAEZE, held in Westchester, California (the "Wells Fargo 7748 Account")
122	IRO and AJAEZE	2/16/2018	Wire transfer of approximately \$500,000 from the Wells Fargo 1849 Account to the Wells Fargo 7748 Account
123	IRO and AJAEZE	2/16/2018	Wire transfer of approximately \$500,000 from the Wells Fargo 1849 Account to the Wells Fargo 7748 Account

COUNTS ONE HUNDRED TWENTY-FOUR THROUGH ONE HUNDRED SIXTY

[18 U.S.C. §§ 1957; 2(a)]

[DEFENDANTS IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, CATHEY, AJAEZE, EKECHUKWU, OCHIAGHA, OGBONNA, UZOKA, SAM MAL, AND ANOZIE]

38. The Grand Jury re-alleges and incorporates paragraphs 1 through 16 of the Introductory Allegations of this Indictment here.

39. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, the following defendants and others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly engaged in, attempted to engage in, and caused others to engage in and attempt to engage in the following monetary transactions, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, by making the following transfers, such property having been derived from specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344(2), knowing that the funds involved represented the proceeds of some form of unlawful activity:

COUNT	DEFENDANT(S)	DATE	TRANSACTION
124	IRO and OGBONNA	9/4/2015	Withdrawal of approximately \$14,000 from the Chase checking account ending in 9837 of defendant IRO, doing business as ("dba") "VOI Enterprises," held in Carson, California (the "Chase 9837 Account")
125	IRO and OGBONNA	9/10/2015	Withdrawal of approximately \$30,000 from the Chase 9837 Account

126	IRO	2/12/2016	Transfer of approximately \$188,600 from the Chase 9837 Account to a Chase savings account ending in 0820 of defendant IRO, dba VOI Enterprises, held in Carson, California ("Chase 0820 Account")
127	IRO	2/12/2016	Transfer of approximately \$161,700 from the Chase 0820 Account to the Chase 9837 Account
128	IRO	2/16/2016	Wire transfer of approximately \$132,950 from the Chase 9837 Account to a Wells Fargo account ending in 6061 of defendant IRO, dba "Irva Auto Sales & Equip Broker LLC," held in Carson, California ("Wells Fargo 6061 Account")
129	IRO	2/16/2016	Wire transfer of approximately \$28,670 from the Chase 9837 Account to the bank account ending in 3107 of UICC 7 at CalCom FCU, held in Torrance, California ("CalCom 3107 Account")
130	IRO	2/16/2016	Wire transfer of approximately \$27,500 from the CalCom 3107 Account to the Wells Fargo 6061 Account
131	IRO	2/16/2016	Wire transfer of approximately \$50,000 from the Wells Fargo 6061 Account to a BOA account ending in 1824
132	IRO	2/16/2016	Withdrawal of approximately \$50,000 from the Wells Fargo 6061 Account
133	IRO	2/18/2016	Wire transfer of approximately \$30,500 from the Wells Fargo 6061 Account to a Chase account ending in 1279 of UICC 8
134	IRO and ANOZIE	4/24/2017	Wire transfer of approximately \$18,598 from the Chase 7866 Account to a SunTrust account of B&B Motors of Tampa Bay Inc.
135	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/11/2017	Wire transfer of approximately \$60,000 from a BOA account ending in 1004 of UICC 11, held in Northridge, California (the "BOA 1004 Account") to a BOA account ending in 5283, held in Paramount, California
136	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/12/2017	Wire transfer of approximately \$75,500 from the BOA 1004 Account to a BOA account ending in 9405, held in Bellingham, Massachusetts (the "BOA 9405 Account")

137	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/15/2017	Withdrawal of cashier's check of approximately \$21,000, addressed to defendant UMEJESI, from the BOA 1004 Account
138	IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, and UZOKA	5/15/2017	Wire transfer of approximately \$30,000 from the BOA 1004 Account to the BOA 9405 Account
139	IRO, OGUNGBE, CATHEY, and NNAMDI	6/7/2017	Wire transfer of approximately \$47,000 from a Chase account ending in 7522, held in Los Angeles, California, to a Citibank account of a Hong Kong company
140	IRO, IGBOKWE, IKOGHO, CATHEY, and OCHIAGHA	6/23/2017	Withdrawal of approximately \$43,750 from a Chase account ending in 7633 of UICC 14, held in Culver City, California, through check deposited to a Chase account ending in 6781 of UICC 15 in Los Angeles, California
141	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/5/2017	Withdrawal of approximately \$47,606.40 from a Chase account ending in 5092 of UICC 16, held in Hawthorne, California (the "Chase 5092 Account") through a cashier's check
142	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/5/2017	Withdrawal of approximately \$52,602 from the Chase 5092 Account through a cashier's check
143	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/7/2017	Withdrawal of approximately \$65,965 from the Chase 5092 Account through a cashier's check
144	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/8/2017	Withdrawal of approximately \$35,000 from the Chase 5092 Account through a cashier's check

145	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/9/2017	Withdrawal of approximately \$35,000 from the Chase 5092 Account through a cashier's check
146	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/10/2017	Withdrawal of approximately \$35,000 from the Chase 5092 Account through a cashier's check
147	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/10/2017	Wire transfer of approximately \$60,000 from the Chase 5092 Account to the BOA 2660 Account
148	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/15/2017	Wire transfer of approximately \$54,600 from the BOA 2660 Account to a Chase account ending in 9931 of OGUNGBE, dba "P and P Motors LLC," held in Santa Fe Springs, California.
149	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/15/2017	Deposit of a cashier's check of approximately \$35,000, issued from Chase 5092 Account, into a Chase account ending in 5812 of UICC 16, held in Inglewood, California ("Chase 5812 Account")
150	IRO, IGBOKWE, UMEJESI, OGUNGBE, CATHEY, EKECHUKWU, and SAM MAL	8/22/2017	Deposit of a cashier's check of approximately \$35,000, issued from the Chase 5092 Account, into the Chase 5812 Account
151	IRO and AJAEZE	1/19/2018	Wire transfer of approximately \$27,455 from a Chase account ending in 0038 of defendant AJAEZE, held in Carson, California (the "Chase 0038 Account"), to a Wells Fargo account in the name "Cadon Auto Corporation"
152	IRO and AJAEZE	1/19/2018	Wire transfer of approximately \$51,865 from the Chase 0038 Account to a Mashreqbank PSC account, held in the United Arab Emirates, in the name "Elite Auto Fze"

153	IRO and AJAEZE	1/31/2018	Wire transfer of approximately \$19,000 from the Chase 0038 Account to a PNC Bank account of The George Washington University to pay the Spring 2018 tuition of a student
154	IRO and AJAEZE	2/1/2018	Purchase of cashier's check of approximately \$12,793 from the Chase 0038 Account
155	IRO, IKOGHO, and AJAEZE	2/15/2018	Wire transfer of approximately \$84,985 from the Chase 0038 Account to a BOA account ending in 5903
156	IRO, IKOGHO, and AJAEZE	2/16/2018	Wire transfer of approximately \$189,000 from the Chase 0038 Account to a Compass Bank account ending in 3681 of defendant IKOGHO, held in Lynwood, California (the "Compass Bank 3681 Account")
157	IRO, IKOGHO, and AJAEZE	2/16/2018	Purchase of a cashier's check of approximately \$35,000 from the Compass Bank 3681 Account
158	IRO and AJAEZE	2/16/2018	Wire transfer of approximately \$200,000 from a Wells Fargo account ending in 1849 of defendant AJAEZE, held in Carson, California (the "Wells Fargo 1849 Account") to a Wells Fargo account ending in 7748 of defendant AJAEZE, held in Westchester, California (the "Wells Fargo 7748 Account")
159	IRO and AJAEZE	2/16/2018	Wire transfer of approximately \$500,000 from the Wells Fargo 1849 Account to the Wells Fargo 7748 Account
160	IRO and AJAEZE	2/16/2018	Wire transfer of approximately \$500,000 from the Wells Fargo 1849 Account to the Wells Fargo 7748 Account

COUNT ONE HUNDRED SIXTY-ONE

[18 U.S.C. §§ 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C); 2(a)]

[DEFENDANT IRO]

Beginning on a date unknown, and continuing at least until May 2, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant VALENTINE IRO, also known as ("aka") "Iro Enterprises," aka "Valentine Obinna Iro," aka "Obinna Iro," aka "Obinna Nassa," doing business as ("dba") V.O.I Enterprises LLC, dba IRVA Auto Sales and Equip Broker LLC ("IRO"), knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business affecting interstate and foreign commerce that (1) operated without an appropriate money transmitting license in California where such operation is punishable as a felony under state law; (2) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder; and (3) involved the transportation and transmission of funds that were known to defendant IRO to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity.

COUNT ONE HUNDRED SIXTY-TWO

[18 U.S.C. §§ 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C); 2(a)]

[DEFENDANTS IGBOKWE AND MANSBANGURA]

Beginning on a date unknown, and continuing at least until May 2, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendants CHUKWUDI CHRISTOGUNUS IGBOKWE, also known as ("aka") "Christogunus C. Igbokwe," aka "Chris Kudon," aka "Atete," aka "Still Kudon" ("IGBOKWE") and TITYAYE MARINA MANSBANGURA, aka "Tityaye Igbokwe," aka "Marina Mansour," aka "Marina Mansaray," aka "Marina Tityaye Mans Bangura" ("MANSBANGURA"), each aiding and abetting the other, knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business affecting interstate and foreign commerce that (1) operated without an appropriate money transmitting license in California where such operation is punishable as a felony under state law; (2) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder; and (3) involved the transportation and transmission of funds that were known to defendants IGBOKWE and MANSBANGURA to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity.

COUNT ONE HUNDRED SIXTY-THREE

[18 U.S.C. §§ 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C); 2(a)]

[DEFENDANT IKOGHO]

Beginning on a date unknown, and continuing at least until February 17, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant JERRY ELO IKOGHO, also known as "J Man" ("IKOGHO"), knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business affecting interstate and foreign commerce that (1) operated without an appropriate money transmitting license in California where such operation is punishable as a felony under state law; (2) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder; and (3) involved the transportation and transmission of funds that were known to defendant IKOGHO to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity.

COUNT ONE HUNDRED SIXTY-FOUR

[18 U.S.C. §§ 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C); 2(a)]

[DEFENDANT UMEJESI]

Beginning on a date unknown, and continuing at least until 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant IZUCHUKWU KINGSLEY UMEJESI, also known as ("aka") "Kingsley Umejesi," aka "Armenian Man," aka "Kingsley LA," aka "Izukung Aka Aku" ("UMEJESI"), knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business affecting interstate and foreign commerce that (1) operated without an appropriate money transmitting license in California where such operation is punishable as a felony under state law; (2) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder; and (3) involved the transportation and transmission of funds that were known to defendant UMEJESI to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity.

COUNT ONE HUNDRED SIXTY-FIVE

[18 U.S.C. §§ 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C); 2(a)]

[DEFENDANT OGUNGBE]

Beginning on a date unknown, and continuing at least until 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant ADEGOKE MOSES OGUNGBE, also known as ("aka") "P & P Motors," aka "Pp," doing business as "P & P Motors LLC" ("OGUNGBE"), knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business affecting interstate and foreign commerce that (1) operated without an appropriate money transmitting license in California where such operation is punishable as a felony under state law; (2) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder; and (3) involved the transportation and transmission of funds that were known to defendant OGUNGBE to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity.

COUNT ONE HUNDRED SIXTY-SIX

[18 U.S.C. §§ 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C); 2(a)]

[DEFENDANT MADEKWE]

Beginning on a date unknown, and continuing at least until January 18, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant OBI ONYEDIKA MADEKWE, also known as "Odu Investment" ("MADEKWE"), knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business affecting interstate and foreign commerce that (1) operated without an appropriate money transmitting license in California where such operation is punishable as a felony under state law; (2) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder; and (3) involved the transportation and transmission of funds that were known to defendant MADEKWE to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity.

COUNT ONE HUNDRED SIXTY-SEVEN

[18 U.S.C. § 2232(a)]

[DEFENDANT IRO]

On or about July 19, 2017, in Los Angeles County, within the Central District of California, prior to and during execution of a federal search warrant by special agents of the Federal Bureau of Investigation, defendant VALENTINE IRO, also known as ("aka") "Iro Enterprises," aka "Valentine Obinna Iro," aka "Obinna Iro," aka "Obinna Nassa," knowingly destroyed, damaged, wasted, disposed of, and transferred, and knowingly attempted to destroy, damage, waste, dispose of, and transfer, a Samsung phone, Model Number SM-G925F, with IMEI 359523064940172 and serial number R58G60161CA, for the purpose of preventing and impairing the government's lawful authority to take such property into its custody and control.

COUNT ONE HUNDRED SIXTY-EIGHT

[18 U.S.C. § 2232(a)]

[DEFENDANT IGBOKWE]

On or about July 19, 2017, in Los Angeles County, within the Central District of California, prior to and during execution of a federal search warrant by special agents of the Federal Bureau of Investigation, defendant CHUKWUDI CHRISTOGUNUS IGBOKWE, also known as ("aka") "Christogunus C. Igbokwe," aka "Chris Kudon," aka "Atete," aka "Still Kudon," knowingly destroyed, damaged, wasted, disposed of, and transferred, and knowingly attempted to destroy, damage, waste, dispose of, and transfer, a gold Apple iPhone 7, Model A1784, FCC ID: BCG-E3092A, with IMEI 359217079598600 and serial number F2LSM1HZHFYH, and a silver Samsung Galaxy Note 5, with IMEI 356000070040951 and serial number RF8GA2MXBZD, for the purpose of preventing and impairing the government's lawful authority to take such property into its custody and control.

COUNT ONE HUNDRED SIXTY-NINE

[18 U.S.C. § 2232(a)]

[DEFENDANT EROHA]

On or about July 19, 2017, in Los Angeles County, within the Central District of California, prior to and during execution of a federal search warrant by special agents of the Federal Bureau of Investigation, defendant CHUKS EROHA, also known as ("aka") "Chuks Nassa Iro," aka "Nassa," aka "Prince Chuddy," aka "Nurse Chuddy," knowingly destroyed, damaged, wasted, disposed of, and transferred, and knowingly attempted to destroy, damage, waste, dispose of, and transfer, a black Apple iPhone 7 Plus, Model A1661, with IMEI 353818086081872 and serial number FCCSW9H3HFXW, for the purpose of preventing and impairing the government's lawful authority to take such property into its custody and control.

COUNT ONE HUNDRED SEVENTY

[18 U.S.C. § 1001(a)(2)]

[DEFENDANT IRO]

On or about July 19, 2017, in Los Angeles County, within the Central District of California, in a matter within the jurisdiction of the executive branch of the government of the United States of America, namely, an investigation by the Federal Bureau of Investigation ("FBI") into the receipt and laundering of proceeds of fraudulent schemes, defendant VALENTINE IRO, also known as ("aka") "Iro Enterprises," aka "Valentine Obinna Iro," aka "Obinna Iro," aka "Obinna Nassa" ("IRO"), knowingly and willfully made materially false, fictitious, and fraudulent statements and representations.

Specifically, defendant IRO stated: (1) that he had broken his Samsung phone, Model Number SM-G925F, with IMEI 359523064940172 (the "Samsung phone") on the morning of July 18, 2017 following a fight with his wife, a day prior to the execution of federal search warrants by special agents of the FBI at his apartment in Carson, California; and (2) that his breaking of the Samsung phone was unconnected to the FBI's execution of search warrants.

The statements were materially false, fictitious, and fraudulent because, as defendant IRO then knew: (1) the Samsung phone was functioning and unbroken at the time that the FBI knocked on the door of defendant IRO's apartment in Carson, California at approximately 6:00 a.m. on July 19, 2017; and (2) defendant IRO broke his Samsung phone at approximately 6:01 a.m. on or about July 19, 2017 after the FBI knocked and announced its intention to execute search warrants.

COUNTS ONE HUNDRED SEVENTY-ONE THROUGH TWO HUNDRED FORTY-NINE

[18 U.S.C. §§ 1028A(a)(1), 2(a)]

[DEFENDANTS IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, CATHEY, MANSBANGURA, AJAEZE, EKECHUKWU, EROHA, OJIMBA, XPLORA G, OCHIAGHA, N. DURU, OFORKA, MARK CHUKWUOCHA, NNAMDI, CHILAKA, OHAJIMKPO, UCHE, ODIONYENMA, OGBONNA, ONWUASOANYA, MACWILLIAM CHUKWUOCHA, UZOKA, AWAK, EGWUMBA, EZIRIM, OKAFOR, SAM MAL, MBA, IKEWESI, OGANDU, ANYANWU, AZUBUIKE, NWACHUKWU, IZUNWANNE, OSUJI, ONYEKA, ANUNOBI, OKOLO, ONUWA, ISAMADE, MADUFOR, NNEBEDUM, OKEREKE, ODIMARA, ONUDOROGU, NZENWAH, OBASI, AGUBE, OKORIE, OHIRI, UGWU, AGWUEGBO, CHUKWU, MEGWA, P. DURU, IWU, CHIKA, MEZIENWA, AGUH, ESHIMBU, ANOZIE, AGUNWA, G. DIKE, UKACHUKWU, OSMUND, NWANGWU, AJAH, EJIOFOR, UBASINEKE, IBETO, NWANEGWO, E. DIKE, EKI, IWUOHA, C. DURU, AND IHEJIUREME]

The Grand Jury re-alleges and incorporates paragraphs 1 through 8 of the Introductory Allegations of this Indictment here.

Beginning on or before October 7, 2014, and continuing through at least May 2, 2018, in Los Angeles County, within the Central District of California, and elsewhere, the following defendants knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation of Title 18, United States Code, Section 1349, Conspiracy to Commit Wire Fraud, Bank Fraud, and Mail Fraud, as charged in Count Two:

COUNT	DEFENDANT
171	IRO
172	IGBOKWE
173	IKOGHO
174	UMEJESI
175	OGUNGBE
176	CATHEY

1	177	MANSBANGURA
	178	AJAEZE
2	179	EKECHUKWU
	180	EROHA
3	181	OJIMBA
	182	XPLORA G
4	183	OCHIAGHA
	184	N. DURU
5	185	OFORKA
	186	MARK CHUKWUOCHA
6	187	NNAMDI
	188	CHILAKA
7	189	OHAJIMKPO
	190	UCHE
8	191	ODIONYENMA
	192	OGBONNA
9	193	ONWUASOANYA
10	194	MACWILLIAM CHUKWUOCHA
	195	UZOKA
11	196	AWAK
	197	EGWUMBA
12	198	EZIRIM
	199	OKAFOR
13	200	SAM MAL
	201	MBA
14	202	IKEWESI
	203	OGANDU
15	204	ANYANWU
	205	AZUBUIKE
16	206	NWACHUKWU
	207	IZUNWANNE
17	208	OSUJI
	209	ONYEKA
18	210	ANUNOBI
	211	OKOLO
19	212	ONUWA
	213	ISAMADE
20	214	MADUFOR
	215	NNEBEDUM
21	216	OKEREKE
	217	ODIMARA
22	218	ONUDOROGU
	219	NZENWAH
23	220	OBASI
	221	AGUBE
24	222	OKORIE
	223	OHIRI
25	224	UGWU
	225	AGWUEGBO
26	226	CHUKWU
	227	MEGWA
27	228	IWU
28	229	CHIKA

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231	AGUH
232	ESHIMBU
233	ANOZIE
234	AGUNWA
235	G. DIKE
236	UKACHUKWU
237	OSMUND
238	NWANGWU
239	AJAH
240	EJIOFOR
241	UBASINEKE
242	IBETO
243	NWANEGWO
244	E. DIKE
245	EKI
246	IWUOHA
247	C. DURU
248	IHEJIUREME
249	MADEKWE

COUNT TWO HUNDRED FIFTY

[18 U.S.C. §§ 1028A(a)(1), 2(a)]

[DEFENDANTS IRO, IGBOKWE, IKOGHO, UMEJESI, OGUNGBE, AND UZOKA]

Beginning on or before April 24, 2017, and continuing through at least May 16, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants VALENTINE IRO, also known as ("aka") "Iro Enterprises," aka "Valentine Obinna Iro," aka "Obinna Iro," aka "Obinna Nassa," CHUKWUDI CHRISTOGUNUS IGBOKWE, aka "Christogunus C. Igbokwe," aka "Chris Kudon," aka "Atete," aka "Still Kudon," JERRY ELO IKOGHO, aka "J Man," IZUCHUKWU KINGSLEY UMEJESI, aka "Kingsley Umejesi," aka "Armenian Man," aka "Kingsley LA," aka "Izaking Aka Aku," ADEGOKE MOSES OGUNGBE, aka "P & P Motors," aka "Pp," and EMMANUEL ONYEKA UZOKA, aka "Emmanuel Mansion," aka "Mansion," aka "Son of God," aka "Ezirim Uzoma," each aiding and abetting the other, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation of Title 18, United States Code, Section 1343, Wire Fraud, as charged in Count 26.

1 COUNT TWO HUNDRED FIFTY-ONE

2 [18 U.S.C. §§ 1028A(a)(1), 2(a)]

3 [DEFENDANTS IRO, CATHEY, AND NNAMDI]

4 Beginning on or before April 12, 2017, and continuing through at
5 least April 24, 2017, in Los Angeles County, within the Central
6 District of California, and elsewhere, defendants VALENTINE IRO, also
7 known as ("aka") "Iro Enterprises," aka "Valentine Obinna Iro," aka
8 "Obinna Iro," aka "Obinna Nassa," ALBERT LEWIS CATHEY, aka "Alb," aka
9 "Abert Jag," aka "Al," and AUGUSTINE NNAMDI, aka "Nnamdi Augustine,"
10 aka "Jazz," each aiding and abetting the other, knowingly
11 transferred, possessed, and used, without lawful authority, a means
12 of identification of another person during and in relation to a
13 felony violation of Title 18, United States Code, Section 1343, Wire
14 Fraud, as charged in Count 22.

COUNT TWO HUNDRED FIFTY-TWO

[18 U.S.C. §§ 1028A(a)(1), 2(a)]

[DEFENDANTS IGBOKWE, MANSBANGURA, ODIONYENMA, and P. DURU]

Beginning on or before January 19, 2017, and continuing through at least May 19, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants CHUKWUDI CHRISTOGUNUS IGBOKWE, also known as ("aka") "Christogunus C. Igbokwe," aka "Chris Kudon," aka "Atete," aka "Still Kudon," CHIKA AUGUSTINE ODIONYENMA, aka "Tony Augustin Odionyenma," aka "Chika Tony," aka "CTA Finance Source Intl," and TITYAYE MARINA MANSBANGURA, aka "Tityaye Igbokwe," aka "Marina Mansour," aka "Marina Mansaray," aka "Marina Tityaye Mans Bangura," each aiding and abetting the other, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation of Title 18, United States Code, Section 1343, Wire Fraud, as charged in Count 24.

On or about the above dates and place, defendant PRINCEWILL ARINZE DURU, aka "Arnzi Prince Will," aka "Arinze," knowingly and intentionally aided, abetted, counseled, commanded, induced, and procured the commission of the offense alleged above.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 982 and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(1) and Title 28, United States Code, Section 2461(c), in the event of any Defendant's conviction of the offenses set forth in any of Counts One and Fifty-Two through One Hundred Sixty-Six of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) Any property, real or personal, involved in such offense, and any property traceable to such property; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 18, United States Code, Section 982(b)(2), any defendant so convicted shall forfeit substitute property, if, by any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty. Substitution of assets shall not be ordered, however, where the convicted defendant acted merely as an

intermediary who handled but did not retain the property in the course of the money laundering offense unless the defendant, in committing the offense or offenses giving rise to the forfeiture, conducted three or more separate transactions involving a total of \$100,000.00 or more in any twelve-month period.

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[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any Defendant's conviction of the offenses set forth in any of Counts Two through Forty-Nine of this Indictment.

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any Defendant's conviction of the offenses set forth in any of Counts Two through Forty-Nine of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

1 in value; or (e) has been commingled with other property that cannot
2 be divided without difficulty.

FORFEITURE ALLEGATION FOUR

[18 U.S.C. §§ 982 and 1028 and 28 U.S.C. §2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Sections 982 and 1028 and Title 28, United States Code, Section 2461(c) in the event of any defendant's conviction of the offenses set forth in any of Counts One Hundred Seventy-One through Two Hundred Fifty-Two of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense;

(b) Any personal property used or intended to be used to commit the offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b) and 1028(g), any defendant so convicted shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party; (c) has been placed beyond the jurisdiction of the

1 court; (d) has been substantially diminished in value; or (e) has
2 been commingled with other property that cannot be divided without
3 difficulty.

4 A TRUE BILL

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6 151
7 Foreperson

8 NICOLA T. HANNA
9 United States Attorney

10 *PK R*
11 PATRICK R. FITZGERALD
12 Assistant United States Attorney
Chief, National Security Division

13 RYAN WHITE
14 Assistant United States Attorney
15 Chief, Cyber and Intellectual
Property Crimes Section

16 ANIL J. ANTONY
17 Assistant United States Attorney
Cyber and Intellectual Property
Crimes Section