



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

April 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ABDULRAHMAN IMRAAN JUMA,
aka "Abdul,"
aka "Rahman,"
KELLY CHIBUZO VINCENT,
aka "Vincent Kelly Chibuzo,"
ABBA ALHAJI KYARI,
RUKAYAT MOTUNRAYA FASHOLA,
aka "Morayo,"
BOLATITO TAWAKALITU AGBABIKA,
aka "Bolamide,"
YUSUF ADEKINKA ANIFOWOSHE,
aka "AJ,"
aka "Alvin Johnson,"

Defendants.

CR 2:21-cr-00203-RGK

I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to Commit Wire Fraud; 18 U.S.C. § 1956(h): Conspiracy to Engage in Money Laundering; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 2(a): Aiding and Abetting; 18 U.S.C. §§ 981, 982, and 1028 and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1 A. Defendants

2 1. Defendant ABDULRAHMAN IMRAAN JUMA, also known as ("aka")
3 "Abdul," aka "Rahman" ("JUMA"), was a resident of the Republic of
4 Kenya ("Kenya").

5 2. Defendant KELLY CHIBUZO VINCENT, aka "Vincent Kelly
6 Chibuzo" ("VINCENT"), and defendant ABBA ALHAJI KYARI ("KYARI") were
7 residents of the Federal Republic of Nigeria ("Nigeria").

8 3. Defendant RUKAYAT MOTUNRAYA FASHOLA, aka "Morayo"
9 ("FASHOLA"), defendant BOLATITO TAWAKALITU AGBABIAKA, aka "Bolamide"
10 ("AGBABIAKA"), and defendant YUSUF ADEKINKA ANIFOWOSHE, aka "AJ," aka
11 "Alvin Johnson" ("ANIFOWOSHE"), were residents of New York State.

12 B. Victim

13 4. The "Victim Businessperson" resided in the State of Qatar
14 ("Qatar").

15 5. The "Qatari Victim Company" was a company founded by the
16 Victim Businessperson to build an international school for children
17 in Qatar.

18 C. Bank Accounts

19 6. The "Capital One Account" was a bank account of defendant
20 AGBABIAKA, with an account number ending in 2389, at Capital One Bank
21 USA, NA, held in Staten Island, New York.

22 7. The "Kenyan Bank Account" was the bank account of a law
23 firm at the Co-operative Bank of Kenya, in Kenya.

24 8. The "Qatari Bank Account" was a bank account of the Qatari
25 Victim Company at Qatar National Bank ("QNB"), in Qatar.

26 9. "TD Bank Account 1" was a bank account of defendant
27 AGBABIAKA, with an account number ending in 1471, at TD Bank, NA ("TD
28 Bank"), held in Staten Island, New York.

1 10. "TD Bank Account 2" was a bank account of an unindicted
2 coconspirator, with an account number ending in 0789, at TD Bank,
3 held in Brooklyn, New York.

4 11. The "Wells Fargo Account 1" was a bank account of an
5 unindicted coconspirator, with an account number ending in 5320, at
6 Wells Fargo Bank, NA ("Wells Fargo"), held in Canoga Park,
7 California.

8 12. "Wells Fargo Account 2" was a bank account, with an account
9 number ending in 6742, at Wells Fargo, held in Tallahassee, Florida.

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COUNT ONE

[18 U.S.C. § 1349]

13. The Grand Jury re-alleges and incorporates here paragraphs 1 through 12 of the Introductory Allegations of this Indictment.

A. OBJECT OF THE CONSPIRACY

14. Beginning no later than on or about November 11, 2019, and continuing until on or about April 26, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants ABDULRAHMAN IMRAAN JUMA, also known as ("aka") "Abdul," aka "Rahman" ("JUMA"), KELLY CHIBUZO VINCENT, aka "Vincent Kelly Chibuzo" ("VINCENT"), ABBA ALHAJI KYARI ("KYARI"), RUKAYAT MOTUNRAYA FASHOLA, aka "Morayo" ("FASHOLA"), BOLATITO TAWAKALITU AGBABIAKA, aka "Bolamide" ("AGBABIAKA"), and YUSUF ADEKINKA ANIFOWOSHE, aka "AJ," aka "Alvin Johnson" ("ANIFOWOSHE"), and unindicted coconspirator #1 ("UICC 1"), unindicted coconspirator Ramon Olorunwa Abbas ("UICC Abbas"), unindicted coconspirator #3 ("UICC 3"), unindicted coconspirator #4 ("UICC 4"), unindicted coconspirator #5 ("UICC 5"), and unindicted coconspirator #6 ("UICC 6"), together with others known and unknown to the Grand Jury, knowingly conspired to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

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

a. UICC 1 would refer a victim to defendant JUMA, who would, in turn, falsely claim that he would provide a loan sought by the victim, through a company defendant JUMA owned in Kenya.

1 b. Defendant JUMA would meet with the victim and falsely
2 promise to provide the loan to the victim in exchange for a
3 consultancy fee paid by wire transfer to a bank account in Kenya.

4 c. After the victim paid the consultancy fee and other
5 fees requested by defendant JUMA, defendant JUMA would provide the
6 victim with forged and fraudulent paperwork that would make it appear
7 that the loan had been paid to the victim's bank account.

8 d. Defendant JUMA would then instruct the victim that
9 additional payments, to be paid by wire transfer to a bank account in
10 Kenya, would be needed to secure the loan.

11 e. In coordination with defendant JUMA, UICC Abbas would
12 interact with the victim, fraudulently claiming to be a director of a
13 U.S. bank that would assist in transferring the loan to the victim.

14 f. Defendant JUMA and UICC Abbas would devise false
15 stories and artifices -- some created by defendant VINCENT and other
16 coconspirators -- to induce the victim to send additional payments to
17 bank accounts in the United States and Kenya.

18 g. UICC Abbas would arrange for coconspirators, including
19 defendant ANIFOWOSHE and UICC 3, to take steps to further the false
20 stories and artifices, to trick the victim into paying additional
21 funds. These steps would include pretending to be an employee of a
22 U.S. bank, filing a Fictitious Business Name Statement with the Los
23 Angeles County Registrar-Recorder/County Clerk's Office, and opening
24 a bank account in Los Angeles County.

25 h. UICC Abbas would ask defendants FASHOLA and AGBABIAKA
26 to identify bank accounts in the United States that could receive
27 payments from the victim.

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1 i. Defendants FASHOLA and AGBABIKA would negotiate with
2 coconspirators about the coconspirators' terms for use of their bank
3 accounts to receive funds from the victim. When defendant FASHOLA or
4 defendant AGBABIKA located a bank that could be used to receive
5 funds from the victim, they would send UICC Abbas a message or
6 messages (a) about the terms demanded by the accountholder, and (b)
7 containing information about the bank account, such as the name of
8 the accountholder, the bank account number, the routing number, and
9 the Society for Worldwide Interbank Financial Telecommunication
10 ("SWIFT") code. At times, defendant AGBABIKA would provide UICC
11 Abbas with information regarding her own bank account, which she
12 would provide to UICC Abbas to be used to receive funds from the
13 victim.

14 j. After UICC Abbas had selected a bank account in the
15 United States to receive a fraudulent payment from the victim,
16 defendant JUMA and UICC Abbas would communicate the account
17 information to the victim, and defendant JUMA and UICC Abbas would,
18 through false or fraudulent pretenses, representations, and promises,
19 and concealment of material facts, cause the victim to deposit, wire,
20 or transfer funds into the bank account that had been identified.

21 k. After the victim had wire transferred funds to a bank
22 account in the United States, UICC Abbas would arrange with
23 defendants FASHOLA and AGBABIKA, and UICC 5 and UICC 6, to withdraw
24 the fraudulently obtained funds from the bank account through
25 (i) wire transfers and teller transfers to other accounts, (ii) the
26 issuance of cashier's checks, and (iii) cash withdrawals in order to
27 obtain the money and so as to conceal and disguise the nature,
28 location, source, ownership, and control of the proceeds.

1 1. Defendants FASHOLA and AGBABIKA, and UICC 4, would
2 also, at times, help UICC Abbas purchase items of value with funds
3 fraudulently obtained from the victim. Defendants FASHOLA,
4 AGBABIKA, and ANIFOWOSHE, with UICC 5, would, at times, assist UICC
5 Abbas in transporting those items of value to him in the United Arab
6 Emirates ("U.A.E").

7 m. At UICC Abbas's request, defendant AGBABIKA would, at
8 times, deposit funds, or cause funds to be deposited, into the bank
9 account of an illicit and unlicensed money exchanger, who would then
10 transfer other funds from a Nigerian bank account that he or she
11 controlled to a Nigerian bank account of a coconspirator specified by
12 UICC Abbas, so that UICC Abbas could obtain the victim's funds.

13 n. When a person, such as a former coconspirator, would
14 contact the victim directly without the approval of defendant JUMA
15 and UICC Abbas -- thereby jeopardizing the success of defendant
16 JUMA's and UICC Abbas' scheme -- UICC Abbas would arrange to have
17 defendant KYARI arrest the former coconspirator and hold the person
18 in jail. UICC Abbas would arrange payment to defendant KYARI
19 (i) using a bank account of another person and (ii) making a transfer
20 to a bank account in Nigeria in the name of a person other than
21 defendant KYARI.

22 C. OVERT ACTS

23 16. In furtherance of the conspiracy, and to accomplish its
24 objects, defendants JUMA, VINCENT, KYARI, FASHOLA, AGBABIKA, and
25 ANIFOWOSHE, and UICC 1, UICC Abbas, UICC 3, UICC 4, UICC 5, and UICC
26 6, together with others known and unknown to the Grand Jury, on or
27 about the dates set forth below, committed and caused to be committed
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1 various overt acts, in the Central District of California and
2 elsewhere, including, but not limited to, the following:

3 Overt Act No. 1: On an unknown date before November 11, 2019,
4 UICC 1 referred the Victim Businessperson's financial advisor to
5 defendant JUMA's company, Westload Financial Solutions Limited,
6 purportedly to assist in arranging a loan to the Qatari Victim
7 Company.

8 Overt Act No. 2: On November 12, 2019, during an in-person
9 meeting in Kenya, defendant JUMA falsely told the Victim
10 Businessperson that defendant JUMA's company, Westload Financial
11 Solutions Limited, would provide a \$15 million loan to the Qatari
12 Victim Company to aid the construction of an international school in
13 Qatar in exchange for a consultancy fee and other legal fees.

14 Overt Act No. 3: On November 13 and 14, 2019, using
15 electronic messages, defendant JUMA fraudulently induced the Victim
16 Businessperson to wire transfer approximately \$164,450, in
17 approximately four transactions, from the Qatari Bank Account to the
18 Kenyan Bank Account.

19 Overt Act No. 4: On December 1, 2019, through an electronic
20 message, defendant JUMA sent the Victim Businessperson a forged and
21 fraudulent wire transfer confirmation purporting to show that \$15
22 million had been transferred from a bank account in the United
23 Kingdom to the Qatari Bank Account.

24 Overt Act No. 5: On December 5, 2019, after the Victim
25 Businessperson learned that the Qatari Bank Account had not received
26 the purported \$15 million wire transfer, defendant JUMA told the
27 Victim Businessperson that the Victim Businessperson would need to
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1 pay an additional fee of \$150,000 to secure the release of the loan
2 funds.

3 Overt Act No. 6: On December 6 and 7, 2019, using electronic
4 messages, defendant JUMA fraudulently induced the Victim
5 Businessperson to wire transfer approximately \$150,000, in
6 approximately four transactions, from the Qatari Bank Account to the
7 Kenyan Bank Account.

8 Overt Act No. 7: On December 10, 2019, defendant JUMA and
9 UICC Abbas, using electronic messages, agreed that UICC Abbas would
10 pose in communications with the Victim Businessperson as a director
11 of a bank that would be involved in releasing the loan funds that the
12 Victim Businessperson expected to receive.

13 Overt Act No. 8: On December 11, 2019, defendant JUMA and
14 UICC Abbas, using electronic messages, discussed with each other what
15 amount of the funds fraudulently obtained from the Victim
16 Businessperson UICC Abbas would receive for his involvement in the
17 scheme.

18 Overt Act No. 9: On December 11, 2019, UICC Abbas sent
19 electronic messages to the Victim Businessperson introducing himself
20 as "Malik," a director at Wells Fargo.

21 Overt Act No. 10: On December 16, 2019, defendant ANIFOWOSHE
22 and UICC Abbas discussed, by phone and electronic messages, a plan
23 for defendant ANIFOWOSHE to call the Victim Businessperson in which
24 defendant ANIFOWOSHE, who spoke English with a less strong accent
25 than did UICC Abbas, would pose as a bank executive from New York.

26 Overt Act No. 11: On December 16, 2019, at the request of UICC
27 Abbas, defendant ANIFOWOSHE called the Victim Businessperson, posing
28 as a bank executive from New York.

1 Overt Act No. 12: On December 17, 2019, acting upon the
2 request of UICC Abbas, UICC 3 filed a Fictitious Business Name
3 Statement with the Los Angeles County Registrar-Recorder/County
4 Clerk's Office in the name of the Qatari Victim Company.

5 Overt Act No. 13: On December 17, 2019, UICC Abbas arranged to
6 have UICC 3 open Wells Fargo Account 1 at a Wells Fargo branch in
7 Canoga Park, California, using the name of the Qatari Victim Company
8 as the business name of the bank account.

9 Overt Act No. 14: On December 19, 2019, using electronic
10 messages, UICC Abbas sent defendant VINCENT the names of the Victim
11 Businessperson, the Qatari Victim Company, and UICC 3, and a
12 photograph of the Fictitious Business Name Statement filed by UICC 3.

13 Overt Act No. 15: On December 19, 2019, after defendant
14 VINCENT created and sent a false and fictitious "Durable Power of
15 Attorney" document to UICC Abbas, UICC Abbas sent the document to the
16 Victim Businessperson in an electronic message.

17 Overt Act No. 16: On December 19, 2019, UICC Abbas
18 communicated with defendant AGBABIAKA about a bank account that could
19 receive funds that were to be fraudulently obtained from the Victim
20 Businessperson.

21 Overt Act No. 17: On December 19, 2019, defendant AGBABIAKA
22 sent UICC Abbas electronic messages containing the account
23 information for the Capital One Account, including the account
24 number, the routing number, the bank's address, and defendant
25 AGBABIAKA's home address.

26 Overt Act No. 18: On December 20, 2019, defendant JUMA and
27 UICC Abbas discussed with each other their plan to have the Victim
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1 Businessperson pay an additional £250,000 to fund a purported
2 "investor's account" in the United Kingdom.

3 Overt Act No. 19: On December 21, 2019, defendant ANIFOWOSHE
4 and UICC Abbas discussed, by phone and electronic messages, a plan
5 for defendant ANIFOWOSHE to call to the Victim Businessperson, again
6 posing as a bank executive from New York.

7 Overt Act No. 20: On multiple dates in December 2019,
8 including December 24, 2019, UICC Abbas negotiated with a watch
9 seller for the purchase of and payment for a rose gold and titanium
10 Richard Mille RM 11-03 watch, which payment was to be directed to
11 Wells Fargo Account 2.

12 Overt Act No. 21: On December 24, 2019, UICC Abbas sent the
13 Victim Businessperson electronic messages containing the account
14 information -- including the accountholders' names and addresses, the
15 account numbers, the routing numbers, and the SWIFT codes -- for the
16 Capital One Account and Wells Fargo Account 2, and provided
17 instructions that the Victim Businessperson should wire transfer a
18 total of \$330,000 to the accounts.

19 Overt Act No. 22: On December 26, 2019, after the Capital One
20 Account received a wire transfer of \$100,000 from the Victim
21 Businessperson's Qatari Bank Account, defendant AGBABIKA withdrew
22 approximately \$7,100 from the Capital One Account to provide to an
23 illicit currency exchanger who would then transfer Nigerian Naira to
24 a Nigerian bank account specified by UICC Abbas.

25 Overt Act No. 23: On December 26, 2019, UICC Abbas asked
26 defendant AGBABIKA, through an electronic message, to exchange an
27 additional \$20,000 using an illicit currency exchanger.

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1 Overt Act No. 24: On December 26, 2019, UICC Abbas sent
2 defendant ANIFOWOSHE electronic messages containing a photograph of a
3 wire transfer confirmation showing a \$230,000 wire by the Victim
4 Businessperson to Wells Fargo Account 2; a photograph of a Richard
5 Mille RM 11-03 watch; and a screenshot of a banking application
6 displaying the balance of the Capital One Account as \$100,058.31.

7 Overt Act No. 25: On December 26, 2019, after UICC Abbas sent
8 an electronic message to defendant ANIFOWOSHE saying that he was
9 “[t]hinking what to buy” with the \$100,000 in the Capital One
10 Account, UICC Abbas and defendant ANIFOWOSHE discussed whether UICC
11 Abbas should purchase an Audemars Piguet Skeleton watch.

12 Overt Act No. 26: On December 27, 2019, defendant AGBABIAKA
13 withdrew approximately \$10,000 from the Capital One Account through a
14 cashier’s check, which she deposited into TD Bank Account 1.

15 Overt Act No. 27: On multiple dates in December 2019,
16 including December 30, 2019, UICC Abbas and UICC 4 sent electronic
17 messages discussing the amount that UICC Abbas would pay to obtain
18 St. Christopher and Nevis (“St. Kitts”) citizenship and a passport.

19 Overt Act No. 28: On December 31, 2019, at the request of UICC
20 Abbas, defendant AGBABIAKA purchased a cashier’s check of
21 approximately \$40,000 drawn from the Capital One Account, which she
22 then mailed to an address in Georgia specified by UICC 4, to pay for
23 St. Kitts citizenship and a passport for UICC Abbas.

24 Overt Act No. 29: On January 3, 2020, at UICC Abbas’ request,
25 defendant AGBABIAKA picked up, from a location in New York State, the
26 rose gold and titanium Richard Mille RM 11-03 watch, which UICC Abbas
27 had purchased using the \$230,000 wire by the Victim Businessperson to
28 Wells Fargo Account 2.

1 Overt Act No. 30: On January 4, 2020, defendant ANIFOWOSHE and
2 UICC Abbas discussed a coconspirator whom defendant Abbas wanted to
3 transport the rose gold and titanium Richard Mille RM 11-03 watch to
4 UICC Abbas in the U.A.E.

5 Overt Act No. 31: On January 4, 2020, at UICC Abbas' request,
6 defendant AGBABIAKA provided the rose gold and titanium Richard Mille
7 RM 11-03 watch to defendant FASHOLA.

8 Overt Act No. 32: On January 4, 2020, defendant FASHOLA
9 provided the rose gold and titanium Richard Mille RM 11-03 watch to
10 UICC 5, to transport the watch to UICC Abbas.

11 Overt Act No. 33: On January 4, 2020, UICC 5 transported the
12 rose gold and titanium Richard Mille RM 11-03 watch by airplane to
13 the U.A.E., where he hand-delivered it to UICC Abbas.

14 Overt Act No. 34: On January 4, 2020, defendant VINCENT sent
15 UICC Abbas, through electronic messages, the phone number for a false
16 and fictitious "telephone banking" system, designed to induce the
17 Victim Businessperson to make additional fraudulent payments.

18 Overt Act No. 35: On January 8, 2020, defendant VINCENT sent
19 UICC Abbas, through electronic messages, the phone number for a
20 different false and fictitious "telephone banking" system, which they
21 would later use to induce the Victim Businessperson to make
22 additional fraudulent payments.

23 Overt Act No. 36: On January 8, 2020, defendant JUMA and UICC
24 Abbas discussed, through electronic messages, how much money they
25 would attempt to extract from the Victim Businessperson using the
26 "telephone banking" system.

27 Overt Act No. 37: On January 8, 2020, defendant VINCENT
28 communicated with UICC Abbas, through electronic messages, about a

1 fake Wells Fargo banking website that he was creating with another
2 coconspirator, designed to induce the Victim Businessperson to make
3 additional fraudulent payments.

4 Overt Act No. 38: On January 8, 2020, defendant VINCENT sent
5 UICC Abbas, through electronic messages, information about a new
6 "storyline" to induce the Victim Businessperson to make a payment of
7 \$575,000.

8 Overt Act No. 39: On January 11, 2020, defendant FASHOLA
9 discussed with UICC Abbas finding a bank account that could be used
10 to receive an additional fraudulently induced payment from the Victim
11 Businessperson.

12 Overt Act No. 40: On January 13, 2020, after learning that
13 defendant VINCENT contacted the Victim Businessperson to tell him/her
14 that UICC Abbas was "fake," defendant JUMA and UICC Abbas discussed
15 what to do to keep defendant VINCENT from interfering in the fraud
16 scheme.

17 Overt Act No. 41: On January 13, 2020, defendant KYARI and
18 UICC Abbas spoke about a plan to arrest defendant VINCENT.

19 Overt Act No. 42: On January 14, 2020, defendant FASHOLA and
20 UICC Abbas communicated, through electronic messages, about a bank
21 account that UICC Abbas could use to receive funds fraudulently
22 obtained from the Victim Businessperson.

23 Overt Act No. 43: On January 14, 2020, UICC 5 sent UICC Abbas
24 the account information for TD Bank Account 2 of UICC 6, through
25 electronic messages.

26 Overt Act No. 44: On January 14, 2020, defendant AGBABIKA
27 told UICC Abbas, through electronic messages, that he could use the
28 Capital One Account to receive a second wire transfer of \$100,000.

1 Overt Act No. 45: On January 14, 2020, UICC Abbas sent
2 defendant JUMA the account information for the Capital One Account
3 and TD Bank Account 2, through electronic messages.

4 Overt Act No. 46: On January 16, 2020, UICC Abbas communicated
5 with defendant KYARI by electronic message and phone about arresting
6 defendant VINCENT and about paying "the team" for arresting defendant
7 VINCENT.

8 Overt Act No. 47: On January 20, 2020, defendant KYARI sent
9 UICC Abbas electronic messages containing biographical information of
10 defendant VINCENT and a photograph of defendant VINCENT, and saying,
11 "We have arrested the guy . . . He is in my Cell now [¶] This is his
12 picture after we arrested him today."

13 Overt Act No. 48: On January 20, 2020, after receiving the
14 photograph of defendant VINCENT, UICC Abbas sent an electronic
15 message to defendant KYARI saying, "I want him to go through serious
16 beating of his life."

17 Overt Act No. 49: On January 20, 2020, in response to
18 defendant KYARI's request for details about what defendant VINCENT
19 did "on audio," so that defendant KYARI would "know what to do," UICC
20 Abbas sent defendant KYARI an audio recording explaining how
21 defendant VINCENT had attempted to interfere in a fraud scheme and
22 steal a victim away from UICC Abbas.

23 Overt Act No. 50: On January 20, 2020, UICC Abbas stated in
24 electronic messages to defendant KYARI, in regard to defendant
25 VINCENT, "Please sir I want to spend money to send this boy to jail,
26 let him go for a very long time."

27 Overt Act No. 51: On January 20, 2020, UICC Abbas stated in
28 electronic messages to defendant KYARI, in regard to the arrest of

1 defendant VINCENT, "Let me know how I can send money to the team
2 sir[,] let them deal with him like armed robber."

3 Overt Act No. 52: On January 20, 2020, defendant KYARI sent an
4 electronic message to UICC Abbas containing the account information
5 for a bank account at a Nigerian bank, Zenith Bank, in the name of a
6 person other than defendant KYARI himself, where UICC Abbas was to
7 direct payment for the arrest and imprisonment of defendant VINCENT.

8 Overt Act No. 53: Between February 5 and 7, 2020, defendant
9 JUMA fraudulently induced the Victim Businessperson to send
10 approximately seven wire transfers, totaling approximately
11 \$299,983.58, from the Qatari Bank Account to the Kenyan Bank Account.

12 Overt Act No. 54: On February 14, 2020, after the Victim
13 Businessperson confided to UICC Abbas that s/he had lost more than
14 \$1,000,000 in the fraud scheme and wrote, "I know that you think I am
15 stupid but I trusted [defendant JUMA] and now I'm going bankrupt,"
16 UICC Abbas -- pretending to be "Malik" -- responded, "Wow 😱, over
17 one million?," and falsely promised to try to help the Victim
18 Businessperson.

19 Overt Act No. 55: On February 17, 2020, using electronic
20 messages, UICC Abbas provided the Victim Businessperson with the
21 account information for the Capital One Account and the TD Bank
22 Account 2, and instructed the Victim Businessperson to wire transfer
23 \$100,000 and \$80,000 to the accounts, respectively, to purportedly
24 facilitate payment of the \$15 million loan to the Victim
25 Businessperson.

26 Overt Act No. 56: On March 3, 2020, after the Victim
27 Businessperson sent UICC Abbas photographs of wire transfer
28 confirmations showing transfers of \$100,000 to the Capital One

1 Account and \$80,000 to TD Bank Account 2, UICC Abbas, using
2 electronic messages, sent the photograph of the wire transfer paid to
3 TD Bank Account 2 to defendant FASHOLA.

4 Overt Act No. 57: On March 3, 2020, defendant AGBABIKA
5 purchased a cashier's check of approximately \$50,000 drawn from the
6 Capital One Account and deposited it to TD Bank Account 1.

7 Overt Act No. 58: On March 3, 2020, defendant AGBABIKA
8 withdrew approximately \$15,000 in cash from the Capital One Account.

9 Overt Act No. 59: On March 4, 2020, defendant AGBABIKA sent a
10 wire transfer of approximately \$50,000 from TD Bank Account 1 to a
11 bank account at Emirates NBD Bank, in the U.A.E.

12 Overt Act No. 60: On March 5, 2020, defendant AGBABIKA
13 withdrew approximately \$10,000 in cash from the Capital One Account.

14 Overt Act No. 61: On March 7, 2020, defendant AGBABIKA
15 withdrew approximately \$7,000 in cash from the Capital One Account.

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COUNT TWO

[18 U.S.C. § 1956(h)]

17. The Grand Jury re-alleges and incorporates here paragraphs 1 through 12 of the Introductory Allegations of this Indictment.

A. OBJECTS OF THE CONSPIRACY

18. Beginning no later than on or about November 11, 2019, and continuing until on or about April 26, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants ABDULRAHMAN IMRAAN JUMA, also known as ("aka") "Abdul," aka "Rahman" ("JUMA"), KELLY CHIBUZO VINCENT, aka "Vincent Kelly Chibuzo" ("VINCENT"), ABBA ALHAJI KYARI ("KYARI"), RUKAYAT MOTUNRAYA FASHOLA, aka "Morayo" ("FASHOLA"), BOLATITO TAWAKALITU AGBABIAKA, aka "Bolamide" ("AGBABIAKA"), and YUSUF ADEKINKA ANIFOWOSHE, aka "AJ," aka "Alvin Johnson" ("ANIFOWOSHE"), and unindicted coconspirator #1 ("UICC 1"), unindicted coconspirator Ramon Olorunwa Abbas ("UICC Abbas"), unindicted coconspirator #3 ("UICC 3"), unindicted coconspirator #4 ("UICC 4"), unindicted coconspirator #5 ("UICC 5"), and unindicted coconspirator #6 ("UICC 6"), together with 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 the proceeds of specified unlawful activity -- namely, wire fraud, in violation of Title 18, United States Code, Section 1343 -- and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and

1 control of the proceeds, in violation of Title 18, United States
2 Code, Section 1956(a) (1) (B) (i);

3 b. to transport, transmit, and transfer, and attempt to
4 transport, transmit, and transfer, funds from a place in the United
5 States to a place outside of the United States, knowing that the
6 property involved in the financial transactions represented the
7 proceeds of some form of unlawful activity, and which property was,
8 in fact, the proceeds of specified unlawful activity -- namely, wire
9 fraud, in violation of Title 18, United States Code, Section 1343 --
10 and knowing that the transportation, transmittal, and transfer were
11 designed in whole and in part to conceal and disguise the nature,
12 location, source, ownership, and control of the proceeds, in
13 violation of Title 18, United States Code, Section 1956(a) (2) (B) (i);
14 and

15 c. to engage and attempt to engage in monetary
16 transactions involving criminally derived property of a value greater
17 than \$10,000, affecting interstate and foreign commerce, which was
18 derived from specified unlawful activity -- namely, wire fraud, in
19 violation of Title 18, United States Code, Section 1343 -- and
20 knowing that the funds represented the proceeds of some form of
21 unlawful activity, in violation of Title 18, United States Code,
22 Section 1957.

23 B. THE MANNER AND MEANS OF THE CONSPIRACY

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

26 a. The Grand Jury re-alleges and incorporates here
27 paragraphs 15.a through 15.n of Section B of Count One of this
28 Indictment.

1 C. OVERT ACTS

2 20. In furtherance of the conspiracy, and to accomplish its
3 objects, defendants JUMA, VINCENT, KYARI, FASHOLA, AGBABIKA, and
4 ANIFOWOSHE, and UICC 1, UICC Abbas, UICC 3, UICC 4, UICC 5, and UICC
5 6, together with others known and unknown to the Grand Jury, on or
6 about the dates set forth below, committed and caused to be committed
7 various overt acts, in the Central District of California and
8 elsewhere, including, but not limited to, the following:

9 Overt Act Nos. 1-61: The Grand Jury re-alleges and incorporates
10 here Overt Act Number 1 through Overt Act Number 61 of Section C of
11 Count One of this Indictment.

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COUNT THREE

[18 U.S.C. §§ 1028A(a)(1); 2(a)]

21. The Grand Jury re-alleges and incorporates here paragraphs 1 through 12 of the Introductory Allegations of this Indictment.

22. Beginning no later than on or about November 11, 2019, and continuing until on or about April 26, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants ABDULRAHMAN IMRAAN JUMA, also known as ("aka") "Abdul," aka "Rahman," KELLY CHIBUZO VINCENT, aka "Vincent Kelly Chibuzo," ABBA ALHAJI KYARI, RUKAYAT MOTUNRAYA FASHOLA, aka "Morayo," BOLATITO TAWAKALITU AGBABIKA, aka "Bolamide," and YUSUF ADEKINKA ANIFOWOSHE, aka "AJ," aka "Alvin Johnson," together with others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly transferred, possessed, and used, without lawful authority, a means of identification that each defendant knew belonged to another person, during and in relation to a felony violation of Title 18, United States Code, Section 1349, Conspiracy to Commit Wire Fraud, as charged in Count 1.

FORFEITURE ALLEGATION ONE

[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 offense set forth in Count One 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 offenses; 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), any defendant 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.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States will seek
5 forfeiture as part of any sentence, pursuant to Title 18, United
6 States Code, Section 982(a)(1), in the event of any defendant's
7 conviction of the offenses set forth in Count Two of this Indictment.

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

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

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

15 3. Pursuant to Title 21, United States Code, Section 853(p),
16 as incorporated by Title 18, United States Code, Section 982(b)(1),
17 and Title 18, United States Code, Section 982(b)(2), any defendant so
18 convicted shall forfeit substitute property, if, by any act or
19 omission of said defendant, the property described in the preceding
20 paragraph, or any portion thereof: (a) cannot be located upon the
21 exercise of due diligence; (b) has been transferred, sold to, or
22 deposited with a third party; (c) has been placed beyond the
23 jurisdiction of the court; (d) has been substantially diminished in
24 value; or (e) has been commingled with other property that cannot be
25 divided without difficulty. Substitution of assets shall not be
26 ordered, however, where the convicted defendant acted merely as an
27 intermediary who handled but did not retain the property in the
28 course of the money laundering offense unless the defendant, in

1 committing the offense or offenses giving rise to the forfeiture,
2 conducted three or more separate transactions involving a total of
3 \$100,000.00 or more in any twelve-month period.

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FORFEITURE ALLEGATION THREE

[18 U.S.C. §§ 982 and 1028]

1 Pursuant to Rule 32.2 of the Federal Rules of Criminal
2 Procedure, notice is hereby given that the United States of America
3 will seek forfeiture as part of any sentence, pursuant to Title 18,
4 United States Code, Sections 982 and 1028, in the event of any
5 defendant's conviction of the offense set forth in Count Three of
6 this Indictment.
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9 2. Any defendant so convicted shall forfeit to the United
10 States of America the following:

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

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

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

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

1 been commingled with other property that cannot be divided without
2 difficulty.

3 A TRUE BILL

4
5 /S/

6 _____
Foreperson

7 TRACY L. WILKISON
Acting United States Attorney

8
9 

10 CHRISTOPHER D. GRIGG
Assistant United States Attorney
11 Chief, National Security Division

12 CAMERON L. SCHROEDER
Assistant United States Attorney
13 Chief, Cyber & Intellectual
Property Crimes Section

14 ANIL J. ANTONY
Assistant United States Attorney
15 Deputy Chief, Cyber &
16 Intellectual Property Crimes
Section

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