

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED

AUG 28 2019

U.S. CLERK'S OFFICE
EVANSVILLE, INDIANA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
V.)
)
EDWIN AGBI, A/K/A)
"KAREEM SUNDAY,")
)
Defendant.)

CAUSE NO. 1:19-cr-280-JRS-DLP

INDICTMENT

GENERAL ALLEGATIONS

Scheme to Defraud Person E.M.

1. Between on or about February 1, 2018 and March 1, 2019, persons known and unknown to the Grand Jury targeted person E.M., an elderly man residing in Levittown, Pennsylvania, as part of a scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises. One or more of the individuals involved in the scheme pretended to be a single woman named "Elizabeth Stevens" on an internet dating site. E.M. developed a relationship with "Stevens," and believed that she was his girlfriend. On multiple occasions, "Stevens" requested that E.M. send her money. In response to these requests, E.M. sent "Stevens" United States currency via mail and wire transfers.

2. On or about February 26, 2019, "Stevens" told E.M. that she needed more money. Because "Stevens" was allegedly in Egypt, she directed E.M. to send \$20,000 in United States

currency to “Kareem Sunday,” one of her personal bankers, via mail, at an address known to the Grand Jury on Consulate Lane, in Indianapolis, Indiana.

Mailing

3. On or about February 26, 2019, E.M. sent \$20,000 in United States currency from Pennsylvania to the address on Consulate Lane, in Indianapolis, Indiana, via United States mail. The parcel was identified as United States Postal Service Priority Two Day Parcel No. XXXXXX12424US (“the Subject Parcel”).

4. On or about March 1, 2019, the Subject Parcel was delivered to the Consulate Lane, Indianapolis, Indiana address by the United States Postal Service. The Subject Parcel contained \$20,000 in United States currency.

SPECIFIC OFFENSE

[Mail Fraud – 18 U.S.C. § 1341]

The Grand Jury charges that:

5. The General Allegations are re-alleged and incorporated herein as if set out in full.

6. Between on or about February 26, 2019 and March 1, 2019, in the Southern District of Indiana, and elsewhere,

EDWIN AGBI, A/K/A “KAREEM SUNDAY,”

the defendant herein, for purposes of executing the scheme, and attempting to do so, did knowingly cause to be delivered by United States mail any matter or thing in the furtherance of the scheme, that is the Subject Parcel, did take and receive the Subject Parcel, and aided and abetted others in so doing.

All of which is in violation of Title 18, United States Code, Sections 1341 and 2.

FORFEITURE

1. The allegations in this Indictment are realleged as if fully set forth here, for the purpose of giving the defendant notice, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, that the United States intends to pursue forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 1956(c)(7)(A), 1961(1) and Title 28, United States Code, Section 2461(c), as part of any sentence imposed.

2. Upon conviction of the offense set forth in this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, \$31,800.00 in United States currency that was seized at the defendant's residence, in Indianapolis, Indiana, on or about March 1, 2019.

3. If any of the property described above, as a result of any act or omission of the defendant:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or 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 which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c). In keeping with the foregoing, it is the intent of the United States to seek forfeiture of any other


property of the defendant up to the value of all forfeitable property as described above in paragraph 2.

A TRUE BILL:



JOSH J. MINKLER
United States Attorney

By:


Matthew B. Miller
Assistant United States Attorney