

"UNDER SEAL"
FILED

CHARLOTTE, NC

JUN 18 2019

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA

DOCKET NO. 3:19-cr-00170-MOC

v.

BILL OF INDICTMENT

SULEMAN ALHASSAN

Violations:

18 U.S.C. § 1349

18 U.S.C. § 1341

18 U.S.C. § 1343

THE GRAND JURY CHARGES:

INTRODUCTION

1. From in or about at least March 2016 and continuing until the date of this Indictment, Defendant SULEMAN ALHASSAN (ALHASSAN), a resident of Charlotte, North Carolina, engaged in a fraudulent scheme to obtain money from victims, who were frequently elderly, by perpetrating romance and precious metal scams. The total loss associated with the scheme is more than \$1,000,000.

SCHEME TO DEFRAUD

2. ALHASSAN, together with co-conspirators known and unknown to the Grand Jury, targeted potential fraud victims through online dating websites, personal contact, and direct mailings sent through the United States Postal Service (USPS) with false promises of romantic relationships.

3. ALHASSAN and his co-conspirators would communicate with victims by various methods to include e-mail, texting, phone calls and on-line forums from within the Western District of North Carolina, and elsewhere, and would purport to develop romantic relationships with the victims.

4. ALHASSAN, and his co-conspirators, would falsely claim to own large quantities of gold located in Ghana and would falsely tell victims that the victims needed to send funds to ALHASSAN and his co-conspirators to help ship the gold from Ghana to the United States or to another foreign country where the gold could be sold. ALHASSAN, and his co-conspirators, would falsely tell the victims that the victims would share in the profits when the gold was sold or was brought into to the United States.

5. ALHASSAN, and his co-conspirators, would further request that victims send funds in a purported effort to secure travel documents for the person with whom the victim believed he was in a romantic relationship.

6. ALHASSAN, and his co-conspirators, would contact the victims again and pretend

to be third party associates of the person with whom the victim believed he was in a romantic relationship with in order to obtain additional funds through fraud.

7. ALHASSAN, and his co-conspirators, would request additional funds from the victims due to fictitious problems, such as falsely informing the victims that there were problems obtaining travel Visas or that the gold, or bank accounts associated with already liquidated gold, had been seized or frozen by customs officials.

8. ALHASSAN, and his co-conspirators, would continue to call, text, and e-mail the victims and insist that additional payments be made for new fees until the victim either ran out of money or discovered the fraudulent nature of the scheme.

9. In truth and fact, none of the victims received any profit or received any gold from ALHASSAN or the co-conspirators.

Purpose of the Conspiracy

10. The purpose of the conspiracy was to enrich ALHASSAN and his co-conspirators by fraudulently inducing victims to pay thousands of dollars by falsely representing that the funds were going to be used for travel documents and shipping of gold from Ghana, and that the victim would receive a large monetary sum once the gold was shipped and sold.

Manner and Means Used in the Conspiracy

11. ALHASSAN and his co-conspirators carried out the conspiracy by the following manner and means, among others:

a. Beginning in or about March of 2016, ALHASSAN and his co-conspirators operated a romance scheme based, in part, in Ghana and in Charlotte, North Carolina as described above;

b. ALHASSAN and his co-conspirators would conceal their actual identities from the victims by using aliases when contacting victims and soliciting money from them;

c. ALHASSAN and his co-conspirators would and did make false representations and false statements to victims, including by email and text messages. For example:

i. They would and did falsely represent themselves to be romantically interested in the victims;

ii. They would and did falsely inform the victims that they resided in Ghana and were in possession or control of a large quantity of gold;

iii. They would and did falsely inform the victims that they needed funds to secure travel documents and airfare to travel to the United States;

iv. They would and did falsely inform the victims that they needed funds to ship gold from Ghana to the United States or another foreign country where the gold could be sold or liquated;

v. They would and did falsely claim that the victim would receive a large portion of the gold or the funds from the sale of the gold in exchange for the victims' monetary assistance in travel and shipping expenses; and

vi. After receiving money from the victims, the co-conspirators would and did re-contact the victims who had already sent payments and falsely state that additional payments were needed because of trouble with customs and travel documents.

d. ALHASSAN and his co-conspirators would and did direct victims to send payments via bank wire, Western Union, Money Gram and other wire transfer services to people and accounts under their control inside the United States and in Ghana;

e. ALHASSAN and his co-conspirators would and did direct victims to purchase cashier's checks and money orders and instruct them to send the checks, money orders or cash to identified parties and addresses using the USPS or other common courier;

f. ALHASSAN and his co-conspirators would and did cause the money orders and cashier's checks to be cashed and the proceed distributed amongst the conspirators; and

g. ALHASSAN and his co-conspirators would keep the funds received to pay the continued costs of operating the romance scheme and to use for their personal benefits.

COUNT ONE
(Conspiracy to Commit Mail Fraud and Wire Fraud – 18 U.S.C. § 1349)

12. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 11 of the Bill of Indictment, and further alleges that:

13. Beginning in or about March 2016, the exact date being unknown to the Grand Jury, and continuing up and to the date of this Indictment, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

SULEMAN ALHASSAN,

did knowingly and willfully combine, conspire, confederate, and agree with and other persons known and unknown to the Grand Jury, to devise and execute a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and during such period, in the course of executing said scheme and artifice by:

a. Depositing and causing to be deposited any mail matter to be sent or delivered by the USPS and any private and commercial interstate carrier, for the purpose of executing the scheme and artifice to defraud, specifically checks, money orders and currency, in violation of Title 18, United States Code, Section 1341; and

b. Transmitting and causing to be transmitted, by means of wire, radio and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, , specifically, emails, text messages, bank wires, and Western Union wire-transfers, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1349.

COUNTS TWO THROUGH SEVEN

(Mail Fraud – 18 U.S.C. § 1341)

14. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 11 of the Bill of Indictment, and further alleges that:

15. On or about the respective dates set forth below, each such date constituting a separate count of the Indictment, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

SULEMAN ALHASSAN,

acting in concert with others, with the intent to defraud, did knowingly and intentionally devise the above described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, did cause the, placed and caused to be placed in a post office and authorized depository for mail matter, to be sent and delivered by the USPS and deposited and caused to be deposited matter and things to be delivered by private and commercial interstate carriers, specifically cash, cashier's checks and money orders, contrary to Title 18, United States Code, Section 1341:

Count	Sender Initials	Mail Sent From	Received	Date	Amount
2	MG	Burlington, NJ	Charlotte, NC	4/7/2017	\$17,600
3	EB	Naples, FL	Charlotte, NC	6/19/2017	\$28,500
4	KE	Inglis, FL	Charlotte, NC	5/21/2018	\$850
5	JP	West Point, VA	Charlotte, NC	7/10/2018	\$400
6	WM	St. Louis, MO	Charlotte, NC	6/22/2017	\$60,000
7	RG	Hillsboro, TX	Charlotte, NC	7/11/2018	\$800

All in Violation of Title 18, United States Code, Sections 1341 and 2.

NOTICE OF FORFEITURE

Notice is hereby given of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under Section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by Section 981(a)(1)(C). The following property is subject to forfeiture in accordance with Section 982 and/or 2461(c):

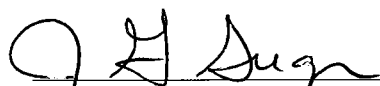
- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment; and
- b. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a).

A TRUE BILL



FOR PERSON

R. ANDREW MURRAY
UNITED STATES ATTORNEY


JENNY GRUS SUGAR
ASSISTANT UNITED STATES ATTORNEY

"UNDER SEAL"**NEW CRIMINAL CASE COVER SHEET****U. S. DISTRICT COURT**

(To be used for all new Bills of Indictments and Bills of Information)

CASE SEALED: ☒ YES ☐ NO**DOCKET NUMBER:**

3:19-cr-170-MCC

If case is to be sealed, a Motion to Seal and proposed Order **must** be attached.)**CASE NAME** : US vs Suleman Alahassan**COUNTY OF OFFENSE** : Mecklenburg**RELATED CASE INFORMATION** :

Magistrate Judge Case Number :

Search Warrant Case Number :

Miscellaneous Case Number :

Rule 20b :

SERVICE OF PROCESS : Arrest warrant**U.S.C. CITATIONS** (Mark offense carrying greatest weight):☐ Petty☐ Misdemeanor☒ Felony

18 U.S.C. Section 1349

JUVENILE: ☐ Yes ☒ No**ASSISTANT U. S. ATTORNEY** : Jenny Sugar**VICTIM/WITNESS COORDINATORS:** Shirley Rutledge**INTERPRETER NEEDED** : N/A**LIST LANGUAGE AND/OR DIALECT:****REMARKS AND SPECIAL INSTRUCTIONS:**