

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District Columbia

United States of America)

v.)

Prince Obiako) Case No.

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Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of 12/22/2019 through 2/3/2017 in the county of Washington in the District of Columbia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C section 1956(h)

did knowingly combine, conspire, and agree with other persons known and unknown to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and Section 1957.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Complainant's signature

FBI Special Agent John Gardner

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by Telephone (specific reliable electronic means).

Date: 12/22/2019

Judge's signature

City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PRINCE OBIAKO

Defendant.

SC No. _____

Filed Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, John Gardner, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) for more than ten years. I am currently assigned to the FBI’s Washington Field Office, Northern Virginia Resident Agency and to a squad which has investigative responsibility for economic crimes. I have participated in numerous criminal investigations to include violations related to corporate fraud, securities fraud, mail fraud, wire fraud, money laundering, computer intrusion, identity theft, and obstruction of justice.

2. I am assigned to this investigation and my involvement has included interviewing witnesses, reviewing emails and text messages, and reviewing financial records.

REASON FOR AFFIDAVIT

3. This affidavit is made in support of a criminal complaint and an arrest warrant charging **PRINCE OBIAKO** (“**OBIAKO**”) with Conspiracy to Launder Monetary Instruments in violation of 18 U.S.C. § 1956(h).

4. The facts and information contained in this affidavit are based on my personal knowledge of the investigation and the observations. This affidavit is not intended to include each and every fact and matter observed by me or known to the government relating to the subject matter of this investigation. Instead, this affidavit contains only those facts which are necessary to establish that probable cause exists.

PROBABLE CAUSE

Background

5. The investigation concerns a romance fraud scheme in which individuals induce women to send money to them allegedly overseas, to and including the countries of Turkey and Cyprus, based on romantic and other misrepresentations and promises to travel to the United States to unite with the women. The perpetrators use banks and financial services entities such as MoneyGram and Western Union, to transfer the money by wire. They utilize Federal Express and UPS, which provide logistics services, to transport packages. Additionally, the perpetrators appear to be moving the proceeds from the romance fraud scheme domestically and internationally using a network of individuals, known as “money mules,” located in the United States, Turkey and Cyprus, and other places yet unknown. Victims also become unknowing participants in the transfer of money to and from other victims. The perpetrators use various means to conceal their identity to prevent detection, including but not limited to using email accounts for the purpose of communicating with victims to defraud them and to communicate with others involved in the conspiracy to defraud victims.

6. Your affiant interviewed an individual, who is approximately 73-years-old, residing within the District of Columbia (Victim 1). Victim 1 was defrauded through a romance scheme and was the victim of various attempts to defraud by the same scheme. Victim 1 claims

a loss of approximately \$1 million to the perpetrators of the scheme between approximately November 2016 and approximately June 2017. Victim 1 provided financial documents, shipping records, and electronic communications related to the romance scheme, which substantiate the fraud and claimed loss.

7. Victim 1 was defrauded by an individual who identifies himself as “WILLIAM OTTO ABRESCH” (“ABRESCH”) and other coconspirators. In or around November 2016, Victim 1 met ABRESCH through online dating site Match.com. Shortly after meeting him online, the two communicated via phone calls and text messaging through WhatsApp. Those communications either originated from or were received by Victim 1 in the District of Columbia and allegedly were with ABRESCH who claimed to be stranded in Cyprus. WhatsApp is an application that can be installed on smartphones. WhatsApp users can talk, text, and share media with other WhatsApp users. According to Victim 1, ABRESCH used multiple WhatsApp phone numbers including but not limited to 201-566-3320, +90 533-825-4478, and 917-261-3711 to communicate with her. The area code for the Turkish Republic of Northern Cyprus is 533. Victim 1 also used her personal email account to exchange numerous emails with ABRESCH through his email account willabz16@gmail.com.

8. Victim 1 sent money by numerous wire transfers to ABRESCH or others, at his direction, for the alleged payment of (a) taxes or immigration fees to help ABRESCH get out of Cyprus, (b) an “OFAC” license, and (c) other fees related to his work ostensibly as a car importer.

9. Victim 2 is a 70-year-old woman residing in or near Leonia, New Jersey. Victim 2 lost approximately \$200,000 to a man she met online who identified himself as “WILLIAM ABRESCH.”

The Fraudulent Scheme

10. After Victim 1 met ABRESCH on Match.com, she exchanged thousands of messages with him using the WhatsApp phone numbers including but not limited to 201-566-3320, 917-261-3711, and +90-533-825-4478. Amid manipulative proclamations of love, lust, desperation, suicide and intentions to travel to the United States to further their romantic relationship, ABRESCH told Victim 1 that he needed her financial assistance to get out of Cyprus. ABRESCH claimed that the funds would be used to pay taxes and fees; for an “OFAC” license; and to pay other fees related to his alleged work as a car importer. ABRESCH claimed to be a resident of Richmond, Virginia, with significant assets that he could not access from Cyprus, but that he would use to repay Victim 1 with substantial returns on her money when they united in America. Based on ABRESCH’s representations and promised repayment, between approximately November 2016 and approximately June 2017, Victim 1 sent ABRESCH or others at his direction, approximately \$1 million in a series of wire transfers. Victim 1 also sent ABRESCH at his request, an Apple computer that cost approximately \$2,800 (“Victim 1 Laptop”).

11. Between about November 16, 2016 until about July 3, 2017, ABRESCH and Victim 1 exchanged more than 17,000 text messages via several WhatsApp phone numbers and emails using ABRESCH’S account willabz16@gmail.com. Examples of some of the text messages and the email communications between Victim 1 and ABRESCH that furthered the romantic fraud scheme are set forth below.

12. On or about November 16, 2016, ABRESCH and Victim 1 began exchanging text messages via WhatsApp from his phone number 917-261-3711. The individual using 917-261-3711 identified himself as “Wills.”

13. On or about November 18, 2016, Victim 1 acknowledged via WhatsApp that ABRESCH was currently in Cyprus.

14. On or about November 20, 2016, ABRESCH noted in a text message, “I’m just coming back from a contract that has been on for 4months [sic].” Victim 1, in anticipation of ABRESCH visiting her, asked him if he knew his way around Washington D.C. ABRESCH said that he could use Google Maps.

15. On or about November 22, 2016, ABRESCH sent a text message to Victim 1 stating, “I have to pay the taxes tomorrow here so I can get my check payment of \$25million [sic]. I won’t be able to transfer any monies. I have spent over \$19million [sic] on contract which includes buying and shipping the cars. I have a tax of almost \$3.7million [sic] to pay which is the only funds I have in my possession then I should get my check payment on Thursday morning. Whatever you spend in purchasing and sending it, I will give right back at the point of meeting.”

16. On or about November 23, 2016, at the request of ABRESCH, Victim 1 drove from her home in the District of Columbia to the Apple Store in Bethesda, Maryland to purchase ABRESCH a laptop that cost approximately \$2,800.

17. On or about November 25, 2016, Victim 1 went to a Federal Express branch located at 5225 Wisconsin Ave., N.W., in the District of Columbia. Victim 1 mailed the Apple computer from this Federal Express location to ABRESCH in Nicosia, Cyprus. A receipt provided by Victim 1 from Federal Express listed ABRESCH’s phone number 917-261-3711. Victim 1 used her credit card to pay Federal Express approximately \$281 in shipping fees.

18. On or about the same day, Victim 1 asked for ABRESCH's email address. ABRESCH responded that his email account is willabz16@gmail.com.

19. On or about November 26, 2016, ABRESCH claimed that he closed his Match.com account. Based on my review of other text messages from this timeframe, ABRESCH told Victim 1 that he closed the Match.com account to suggest that they were involved in a committed and exclusive relationship.

20. On or about November 29, 2016, ABRESCH sent a text message to Victim 1, which stated, "I just got the laptop and have been sorting the papers for the rest of the cars. I should be done today."

21. On or about the same day, ABRESCH sent a text message to Victim 1, stating, "I paid the taxes yesterday and supposed [sic] to get my paycheck but I'm a bit short on the taxes. Hence my check won't be released until I complete that payment. I'm just going to kill my self [sic]. No jokes!! [sic]." ABRESCH also sent a text message to Victim 1 in which he claimed that a friend was assisting him in paying the tax shortage, but the friend could not loan him the full amount due. In that message he told Victim 1, "[s]o he would agree to helping [sic] me however my check is for \$27,000,000. He's only able to help me with 55,000 euros so Im [sic] sure I can pay him double the amount. I'm quite sure I owe you about \$3500 [sic]." This text message and several similar text messages over the course of their communications appear designed to induce Victim 1 to send money to ABRESCH to help him with the alleged tax payment shortage so that he could leave Cyprus and unite with Victim 1 in or near the District of Columbia.

22. On or about December 12, 2016, ABRESCH sent a text message to Victim 1 via WhatsApp from phone number +90 533-825-4478. ABRESCH identified himself as "Wills."

23. On or about December 13, 2016, Victim 1 went to Capital One Bank, located at 1700 K Street, N.W., in the District of Columbia. At the direction of ABRESCH, Victim 1 sent \$20,025 by wire transfer to an account allegedly held by Coconspirator A at Akbank Private Banking in Istanbul, Turkey.

24. On or about December 14, 2016, ABRESCH sent a text message to Victim 1 noting, “[t]here are lots of scams, drug trafficking and terrorism. Obviously they would want to confirm you're not promoting none of this. You're a strong woman and you've been to turkey [sic] at least. So confidently tell them it's for renovation if [sic] property xxx. Hope you're well miss u xxxx [sic].” In this text message, ABRESCH encourages Victim 1 to make false statements to the bank, which is reluctant to process Victim 1’s request to perform the wire transfer because the bank suspects Victim 1 is being defrauded. Throughout their WhatsApp correspondence, ABRESCH frequently made statements to Victim 1 to overcome her concerns about fraud and he often directed her to make false statements to the financial institutions that suggested to Victim 1 that ABRESCH was engaged in fraud. ABRESCH also encouraged Victim 1 to use particular banks, such as Bank of America, because, he said, they would ask fewer questions.

25. On or about December 20, 2016, Victim 1 went to a Bank of America branch located in the Friendship Heights section of Northwest, Washington, D.C. At the direction of ABRESCH, Victim 1 sent a \$52,000 wire transfer to Coconspirator A’s bank account in Turkey.

26. On or about December 21, 2016, Victim 1 went to the same Bank of America branch located in the Friendship Heights section of Northwest, Washington, D.C. At the direction of ABRESCH, Victim 1 sent a \$91,000 wire transfer to Coconspirator A’s bank account in Turkey.

27. On or about December 22, 2016, Victim 1 returned to the Bank of America branch in the Friendship Heights section of Northwest, Washington, D.C. At the direction of ABRESCH, Victim 1 sent a \$40,000 wire transfer to **OBIAKO** who allegedly had a bank account at Akbank Tas in Istanbul, Turkey. On or about February 3, 2017, Victim 1 also sent **OBIAKO** a \$5,000 wire transfer.

28. On or shortly after February 17, 2017, Victim 1 received a UPS package from Victim 2 that was sent from New Jersey. The package, addressed to Victim 1 at her home in Washington, D.C., contained a PNC cashier's check #2823473 for \$46,000. The cashier's check was purchased on February 17, 2017, and was made payable by Victim 2 to Victim 1.

29. Records from Victim 2 show that between approximately 2016 and approximately 2017, Victim 2 sent multiple payments totaling more than \$200,000 to individuals including ABRESCH and **OBIAKO**.

30. On or about April 13, 2017, ABRESCH sent a text message to Victim 1 via WhatsApp from phone number 201-566-3320. The message stated, "Hello love xxxx." Victim 1 knew that it was ABRESCH because he was the only person with whom she communicated by WhatsApp.

31. On or about July 3, 2017, Victim 1 received a call from ABRESCH. He called from WhatsApp phone number 201-566-3320, the same phone number through which Victim 1 exchanged WhatsApp text messages with ABRESCH. The FBI monitored this call with Victim 1's consent. During the call, ABRESCH initially said that he received \$1 million from Victim 1, but later in the call, he confirmed that he received \$1.5 million from Victim 1. ABRESCH also asked for \$20,000 so that he could travel to see Victim 1 and he told her not to worry about

the \$200,000 that he previously asked her to send. Additionally, ABRESCH asked Victim 1 to send \$1,500 to SUNIL KAPOOR in Nicosia, Cyprus.

PRINCE OBIAKO

32. Records from Google indicate on or about January 18, 2017, willabz16@gmail.com sent an email to press-copy@outlook.com which had a picture embedded into the email. The picture was a wire transfer form that Victim 1 provided to ABRESCH. The wire transfer was dated January 10, 2017, in the amount of \$185,000 from Victim 1 to a Turkish bank account for the beneficiary of Coconspirator B. The wire transfer information is consistent with the documents provided by Victim 1.

33. On or about January 18, 2017, an email was sent from willabz16@gmail.com to press-copy@outlook.com which had a picture embedded into the email. The picture was an email dated January 17, 2017, from Bank of America to Victim 1 confirming a wire transfer.

34. Emails and email attachments show press-copy@outlook.com was accessed and/or controlled by **OBIAKO**. For example, records from Microsoft indicate that an email was forwarded on or about December 5, 2017, from pobiako@yahoo.com (sender listed as Obiako Prince) to press-copy@outlook.com. The email had two attachments. The first attachment was a letter addressed to a consular officer explaining why **OBIAKO** should not be banned from receiving a UK Passport; the letter referenced a passport number for **OBIAKO** of A08689518. The second document appeared to be a print out of a UK VISA Application. The applicant was **PRINCE OBIAKO** with date of birth of October 30, 1990 and passport number A08689518. During this investigation, I have learned that on or about January 9, 2018, **OBIAKO** was issued a US VISA with the same date of birth (October 30, 1990) and passport number (A08689518) as the UK VISA Application and listed pobiako@yahoo.com as his personal email account.

35. A review of records from Microsoft also indicates that an email thread that was sent on or about December 5, 2017 from “**Obiako Prince**” using email pneme7@gmail.com to press-copy@outlook.com. The subject of the email was “Reference letter for Prince Obiako Uk visa Application.” Based on the content of the email, pneme7@gmail.com appears to be **OBIAKO**’s email account that he used to communicate with a professor. The email asked for a reference letter for a UK VISA application with attachments. One of the attachments was a screenshot from a smart phone which appeared to be student information for **PRINCE OBIAKO** from the website student.gau.edu.tr with other information including his student number and a photograph of **OBIAKO**. Another attachment to the December 5 email was a reference letter for **OBIAKO** addressed to the British Consulate located in North Cyprus. The letter had a signature line at the end of the letter by a professor with her contact information at the Girne American University. The letter did not have a signature.

36. Records from Microsoft also indicate that an email was sent on or about December 19, 2017 from pobiako@yahoo.com to press-copy@outlook.com. The email had an attachment named prin.pdf which was an eight page US VISA Application for **PRINCE OBIAKO**.

37. Given the personal nature these emails and email attachments, it appears that press-copy@outlook.com was accessed and/or controlled by **OBIAKO**.

38. Records from internet service providers show that **OBIAKO** had access to multiple email accounts including but not limited to pneme7@gmail.com, scobiinter@yahoo.com, and pobiako@yahoo.com. Records from Google indicate that pneme7@gmail.com was registered to “Prince Neme” with a recovery email scobiinter@yahoo.com. Records from Apple indicate that the Apple ID pobiako@icloud.com

was also registered with scobiinter@yahoo.com and pobiako@yahoo.com. Records from Yahoo indicate that pobiako@yahoo.com was registered with an alternate email address scobiinter@yahoo.com. Records from Apple indicate that Apple ID pneme7@gmail.com was registered to “Willis Abresch.”

39. Records from MoneyGram show that between June 2016 and August 2017, **OBIAKO** received approximately 57 money transfers totaling approximately \$40,500. Approximately 12 US based individuals sent money transfers to **OBIAKO**, who received the money in Cyprus. One of the individuals that sent money was Victim 2; on or about January 25, 2017, she sent approximately \$700 to **OBIAKO**.

40. Victim 2 provided records related to the romance scam. Victim 2 also had WhatsApp messages with ABRESCH. For example, on October 17, 2016, ABRESCH and Victim 2 were discussing a \$22,000 wire transfer. ABRESCH provided Victim 2 new wiring instructions, “Because **Prince** can’t receive such amount from that bank.” Victim 2 also created a list of payments she made at the direction of ABRESCH. On October 11, 2016, Victim 2 sent two wire transfers, a \$4,000 and \$3,000 wire transfer from her Wells Fargo account to two different **OBIAKO**’s accounts at Turkiye Is Bankasi.

41. In summary, **OBIAKO** received money from Victim 1, Victim 2, and approximately 10 other US individuals between about 2016 and about 2017 totaling approximately \$92,000. One of **OBIAKO**’s Apple IDs pneme7@gmail.com was registered in the name of “Willis Abresch,” which is similar to the name that Victim 1 and Victim 2 were defrauded by, WILLIAM ABRESCH. The individual using willabz16@gmail.com sent **OBIAKO** emails containing information about Victim 1’s wire transfers.

42. On or about December 22, 2019, **OBIAKO** entered the United States at Hartsfield-Jackson Atlanta International Airport. At the time of his entry, he presented a passport to Customs and Border Protection that had been issued by the Federal Republic of Nigeria with the following identifying information: Date of Birth, October 30, 1990; Passport Number A08689518. This date of birth and passport number were the same as the dates of birth that I found included in the personal documents described above that came from the records for the “press-copy” email account. At the time of entry, **OBIAKO** told Customs and Border Protection that he did not have friends or family in the United States.

43. The passport that **OBIAKO** presented to Customs and Border Protection on or about December 22 also included a photograph. I have compared this passport photo to the student ID photo that I found as an attachment to an email message in the “press-copy” account for the user of the account named “Prince Obiako.” They appear to me to be the same person in both photos.

44. I have also compared the photograph that accompanied **OBIAKO**'s US visa application from January 2018. That photograph also appears to be the same person.

CONCLUSION

45. Based on my training and experience, and the information provided in this affidavit, there is probable cause to believe that between on or about December 22, 2016 and on or about February 3, 2017, in the District of Columbia and elsewhere, **PRINCE OBIAKO** and others unlawfully, willingly, and knowingly committed criminal offenses in violation of 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering).

Respectfully submitted,



John Gardner
Special Agent
Federal Bureau of Investigation, WFO-NVRA

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone this ___ day of December 2019:

JUDGE ROBIN M. MERIWEATHER
UNITED STATES MAGISTRATE JUDGE