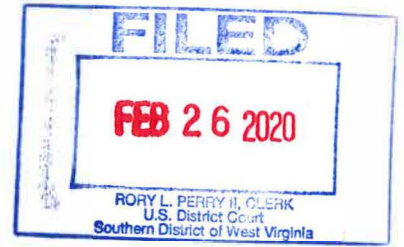


UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON GRAND JURY 2019
FEBRUARY 25, 2020 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:20-cr-00042

18 U.S.C. § 1956(h)

18 U.S.C. § 1344(2)

18 U.S.C. § 1957

PATRICIA DUDDING

I N D I C T M E N T

The Grand Jury charges:

At all times relevant to the Indictment:

Background

1. From at least May 2018 until at least July 2019, defendant PATRICIA DUDDING was involved in an international money-laundering scheme with an individual believed to be from Nigeria, known as "Lucas," and others known and unknown to the Grand Jury, located in the United States.

2. As a result of the fraud associated with this scheme, victims have been identified from across multiple states and several different foreign countries.

3. Defendant DUDDING and Lucas worked together, and with others both known and unknown, in orchestrating this large international fraud scheme, and illegally obtaining money from individuals located both within the United States and abroad.

4. Defendant DUDDING acted as a “money mule” for Lucas, meaning that numerous victims funneled money to defendant DUDDING’s bank accounts, at Lucas’ direction.

5. Defendant DUDDING opened and maintained bank accounts for a period of time with JP Morgan Chase Bank, N.A. (“JP Morgan Chase”), SunTrust Bank (“SunTrust”), United Bank, Community Trust Bank, Inc., First State Bank, Huntington National Bank, Branch Banking and Trust (“BB&T”), City National Bank, People’s Bank, WesBanco Bank, and Huntington Federal Savings.

6. JP Morgan Chase, SunTrust, United Bank, Community Trust Bank, Inc., First State Bank, Huntington National Bank, BB&T, City National Bank, People’s Bank, WesBanco Bank, and Huntington Federal Savings were all “financial institutions” as the term “financial institution” is defined in 18 U.S.C. § 20, whose deposits’ accounts were insured by the Federal Deposit Insurance Corporation (“FDIC”)

7. At all relevant times, JP Morgan Chase, SunTrust, United Bank, Community Trust Bank, Inc., First State Bank, Huntington National Bank, BB&T, City National Bank, People’s Bank, WesBanco Bank, and Huntington Federal Savings were also financial institutions as defined in 31 U.S.C. § 5312(a)(2), which engaged in, and the activities of which affected, interstate commerce.

8. Victim Bank 1 is a “financial institution” as defined in 18 U.S.C. § 20 which has a branch at or near Huntington, Cabell County, West Virginia.

9. Victim Bank 2 is a “financial institution” as defined in 18 U.S.C. § 20 which has a branch at or near Huntington, Cabell County, West Virginia.

10. Victim Bank 3 is a “financial institution” as defined in 18 U.S.C. § 20 which has a branch at or near Huntington, Cabell County, West Virginia.

11. Known Person 1 is a person known to the Grand Jury, who is another money mule and associate of defendant DUDDING and Lucas.

Count One
(Conspiracy to Commit Money Laundering 18 U.S.C. § 1956(h))

12. From in or around May 2018 until at least July 2019, at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant PATRICIA DUDDING and others both known and unknown to the Grand Jury, did willfully, that is, with the intent to further the objects of the conspiracy, knowingly combine, conspire, confederate, and agree with each other, to commit certain offenses against the United States, in violation of 18 U.S.C. § 1956, that is, to wit:

(a) to knowingly conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that such financial transaction represented the proceeds of some form of unlawful activity, and knowing that such financial transaction was designed in whole and in part to conceal and disguise the nature, the location, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

13. It is further alleged that the specified unlawful activity the funds were derived from were wire fraud, in violation of 18 U.S.C. 1343; mail fraud, in violation of 18 U.S.C. § 1341; and bank fraud, in violation of 18 U.S.C. § 1344(2).

General Manner and Means of Carrying out the Conspiracy

14. The manner and means used to accomplish the objectives of the conspiracy included among others, the following:

15. Lucas gave defendant DUDDING's personal bank account numbers to victims who wire transferred money into their personal bank accounts and mailed cash, personal checks or Cashier's checks to money mules, including defendant DUDDING, who then deposited into their personal bank accounts.

16. Victims also sent these funds to defendant DUDDING's bank accounts via Western Union, Money Gram, Stripe, and Square Inc.

17. After the deposit of the funds in defendant DUDDING's accounts, defendant DUDDING would then transfer these funds to Nigerian companies, such as Keibler Couture Global Ltd., whose bank account is located in Nigeria. Defendant DUDDING also transferred large sums of money between herself and other money mules during the scheme.

18. Lucas and defendant DUDDING communicated frequently from early spring 2018 until at least July 30, 2019, either online or through text messages.

19. Lucas then asked defendant DUDDING to set up numerous bank accounts in her name, at over 10 different banks.

20. Defendant DUDDING received numerous deposits from at least 23 different individuals located domestically and abroad in the bank accounts that she either opened or held on

Lucas' behalf. Defendant DUDDING neither spoke with or met many of the individuals who either transferred money into her bank accounts or sent her checks and cash which she then deposited into her bank accounts.

21. Lucas would contact defendant DUDDING to tell her how much money he was going to have deposited into her account. Each time after Lucas would have wire transfers and checks sent to her personal bank accounts, Lucas would tell her when to send a wire transfer to Nigeria or make other disbursements.

22. Sometimes bank officials questioned defendant DUDDING about the incoming wire transfers into her account and her outgoing wire transfers to Nigeria. Defendant DUDDING lied to the bank officials who questioned her about her financial transactions.

23. Several different bank officials employed at different banks informed defendant DUDDING that she was being used as part of a scam.

24. After defendant DUDDING sent numerous wire transfers to Nigeria, numerous banks closed defendant DUDDING's accounts due to suspected fraudulent activity.

25. When a bank closed defendant DUDDING's account, she would open a new account at another bank.

26. On January 11, 2019, a bank known to the Grand Jury (hereinafter, Victim Bank 1), was alerted about unusual activity within defendant DUDDING's account. When Victim Bank 1's Fraud Department contacted defendant DUDDING, she stated that her cousin "Brenda" relocated to the United Kingdom in the summer of 2018. Defendant DUDDING did not have a cousin named Brenda living in the United Kingdom. Defendant DUDDING elaborated further

that Brenda's husband Lucas worked in oil and gas investments and that the transactions from within her accounts were done for Lucas's associates in the industry.

27. In the spring of 2019, defendant DUDDING received a letter from a bank known to the Grand Jury, wherein she was advised that the bank was closing her account for suspected fraudulent activity and that funds within her account were frozen.

28. Defendant DUDDING opened a checking account with another bank known to the Grand Jury, in April 2019. Defendant DUDDING was questioned by a bank employee regarding a Stripe payment for \$30,269.99 that was pending in her account. When questioned, defendant DUDDING falsely told the bank employee that defendant DUDDING's cousin was building a gas station in England and was sending defendant DUDDING these funds so she could send them to another relative in California to purchase equipment for him. The bank employee then told defendant DUDDING that the activity seemed suspicious.

29. On April 26, 2019, defendant DUDDING sent a wire transfer from her account held by a bank known to the Grand Jury (hereinafter, Victim Bank 3) to a person known to the Grand Jury (hereinafter, Known Person 1), in Montana for \$39,000. A Victim Bank 3 employee spoke to defendant DUDDING about this wire transfer and defendant DUDDING informed the bank employee that Known Person 1 worked with defendant DUDDING's cousin in real estate and she had dealt with her in the past and trusted her, which was false.

30. Defendant DUDDING used over \$100,000 of victim funds for her personal benefit over the course of the scheme. For example, defendant DUDDING used the funds to pay for her utility bills, Direct TV service, groceries, drug store purchases, gasoline purchases, department

store purchases, restaurants, cashed checks, and numerous cash withdrawals. During the period of the scheme, defendant DUDDING's cash withdrawals alone totaled to \$41,928.

31. The loss amount attributed to the fraudulent scheme is at approximately \$3.2 million. Defendant DUDDING received over \$3.2 million in her accounts and transferred approximately \$1,167,070 to Nigeria during the course of the money laundering scheme.

All in violation of Title 18, United States Code, Section 1956(h).

**Count Two
(Bank Fraud)**

1. Paragraphs 1-31 are incorporated by reference herein.

2. Victim Bank 1 is a “financial institution” as defined in 18 U.S.C. § 20 which has a branch at or near Huntington, Cabell County, West Virginia.

The Scheme

3. From on or about January 11, 2019, at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant PATRICIA DUDDING did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money, funds, credits and property owned by and under the custody and control of a financial institution, that is, Victim Bank 1, by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means of the Scheme

4. It was part of the scheme that defendant DUDDING knowingly opened bank accounts at financial institutions in her name. Further, defendant DUDDING would use these bank accounts to wire and receive fraudulent funds.

5. It was further a part of the scheme that defendant DUDDING used false and fraudulent pretenses and made false and fraudulent representations to the financial institutions to make it appear that wire transfers were being sent for legitimate purposes, and defendant DUDDING falsely and fraudulently failed to disclose to the financial institutions the true purpose of these wire transfers.

6. On or about January 11, 2019, defendant DUDDING sent a wire transfer of \$26,300 from her Victim 1 bank account.

7. On January 11, 2019, Victim Bank 1 was alerted about unusual activity within defendant DUDDING's account. The bank's Fraud Department contacted defendant DUDDING, who falsely stated that her cousin "Brenda" relocated to the United Kingdom in the summer of 2018. Defendant DUDDING falsely elaborated further that Brenda's husband Lucas works in oil and gas investments and that the transactions from within her accounts were done for Lucas's associates in the industry.

In violation of Title 18, United States Code, Section 1344(2).

**Count Three
(Bank Fraud)**

1. Paragraphs 1-31 are incorporated by reference herein.
2. Victim Bank 2 is a “financial institution” as defined in 18 U.S.C. § 20 which has a branch at or near Huntington, Cabell County, West Virginia.

The Scheme

3. From on or about April 26, 2019, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant PATRICIA DUDDING did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money, funds, credits and property owned by and under the custody and control of a financial institution, that is, Victim Bank 2, by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means of the Scheme

4. It was part of the scheme that defendant DUDDING knowingly opened bank accounts at financial institutions in her name. Further, defendant DUDDING would use these bank accounts to wire and receive fraudulent funds.

5. It was further a part of the scheme that defendant DUDDING used false and fraudulent pretenses and made false and fraudulent representations to the financial institutions, to send wire transfers for illegitimate purposes, and defendant DUDDING falsely and fraudulent failed to disclose to the financial institutions the true purpose of these wire transfers.

6. On April 26, 2019, defendant DUDDING sent a wire transfer from her Victim Bank 2 account to a person known to the Grand Jury (hereinafter, Known Person 1), in Montana for \$39,000. A Victim Bank 2 employee spoke to defendant DUDDING about this wire transfer and

defendant DUDDING falsely informed the bank employee that Known Person 1 worked with defendant DUDDING's cousin in real estate and she had dealt with her in the past and trusted her, which defendant DUDDING knew was false.

In violation of Title 18, United States Code, Section 1344(2).

**Counts Four -Eleven
(Unlawful Monetary Transactions)**

1. Paragraphs 1-31 are incorporated by reference herein.
2. At all relevant times, WesBanco, JP Morgan Chase and SunTrust were financial institutions as defined in 31 U.S.C. § 5312(a)(2), which engaged in, and the activities of which affected, interstate commerce.
3. Wesbaco, JP Morgan Chase and SunTrust were “financial institutions” as defined in 18 U.S.C. § 20.
4. WesBanco, JP Morgan Chase and SunTrust all had branches in Huntington, Cabell County, West Virginia.
5. On or about the date listed below for each Count, in Huntington, Cabell County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant PATRICIA DUDDING knowingly engaged in and caused others to engage in a monetary transaction by, through, and to a financial institution, as specified below for each Count, in criminally derived property that was of a value greater than \$10,000 and which was derived from specified unlawful activities, that is, wire fraud in violation of 18 U.S.C. § 1343, and bank fraud in violation of 18 U.S.C. § 1344.
6. While engaging in and causing others to engage in the monetary transaction, defendant DUDDING knew that the property involved in the monetary transaction was criminally derived.

Count	Approx. Date	Monetary Transaction
4	February 19, 2019	Wire transfer of \$94,000 from defendant DUDDING ’s JP Morgan Chase account held at or near Huntington, Cabell

Count	Approx. Date	Monetary Transaction
		County, West Virginia, to United Bank for Africa located in Lagos, Nigeria
5	March 6, 2019	Wire transfer of \$98,000 from defendant DUDDING 's JP Morgan Chase account held at or near Huntington, Cabell County, West Virginia, to United Bank for Africa located in Lagos, Nigeria
6	March 14, 2019	Wire transfer of \$98,000 from defendant DUDDING 's JP Morgan Chase account held at or near Huntington, Cabell County, West Virginia, to United Bank for Africa located in Lagos, Nigeria
7	April 8, 2019	Deposited a check for \$42,390 written from a person known to the Grand Jury, into defendant DUDDING's SunTrust account held at or near Huntington, Cabell County, West Virginia
8	June 10, 2019	Deposit of \$45,000 in defendant DUDDING's WesBanco account held at or near Huntington, Cabell County, West Virginia
9	June 12, 2019	Withdrawal of \$63,321 from defendant DUDDING's SunTrust account held at or near Huntington, Cabell County, West Virginia
10	June 12, 2019	Withdrawal of \$37,212 from defendant DUDDING's SunTrust account held at or near Huntington, Cabell County, West Virginia
11	June 13, 2019	Withdrawal of \$89,789 from defendant DUDDING 's SunTrust account held at or near Huntington, Cabell County, West Virginia

All in violation of Title 18, United States Code, Section 1957.

**Count Twelve
(Bank Fraud)**

1. Paragraphs 1-31 are incorporated by reference herein.

2. Victim Bank 3 is a “financial institution” as defined in 18 U.S.C. § 20 which has a branch at or near Huntington, Cabell County, West Virginia.

The Scheme

3. From in or about December 16, 2019 to on or about December 18, 2019, at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant PATRICIA DUDDING did knowingly devise and intend to devise a scheme and artifice to attempt to defraud and to attempt to obtain money, funds, credits and property owned by and under the custody and control of a financial institution, that is, Victim Bank 3, by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means of the Scheme

4. It was part of the scheme that defendant DUDDING attempted to open a bank account in her and her daughter’s name at Victim Bank 3 on December 16, 2019.

5. During the process to open an account, a Victim Bank 3 employee informed defendant DUDDING that there were multiple inquiries about defendant DUDDING from other financial institutions.

6. Defendant DUDDING falsely and fraudulently informed the Victim Bank 3 employee that she had been previously used as a money mule but that those charges were dismissed against her and that nothing was supposed to show up because her records were sealed by the Department of Justice. The Victim Bank 3 employee refused to open the account.

7. On December 18, 2019, defendant DUDDING returned to Victim Bank 3 after her request to open an account was denied. The bank again refused to open the account.

In violation of Title 18, United States Code, Section 1344(2).

NOTICE OF FORFEITURE

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of giving notice of forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1)-(2) and 28 U.S.C. § 2461(c).

2. 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 18 U.S.C. § 982 and/or 28 U.S.C. § 2461(c):

- a. all property which constitutes or is derived from proceeds of the violations set forth in this bill of information;
- b. all property involved in such violations or traceable to property involved in such violations; and
- c. if, as set forth in 21 U.S.C. § 853(p), any property described in paragraphs (a) or (b) 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) and (b).

The following property is subject to forfeiture on one or more of the grounds stated above:

- a. A forfeiture money judgment in the amount of at least \$100,000, such amount constituting of the proceeds of the violations set forth in this bill of information.
- b. Approximately \$29,781.79 seized from personal account number ending in 4743 and personal account number ending in 1317. Both accounts were held at Huntington Federal Savings Bank.
- c. Approximately \$9,627.27 seized from personal account number ending in 2878 at WesBanco Bank.
- d. Approximately \$1,606,353.51 seized from personal account number ending in 6498 at SunTrust Bank.
- e. Approximately \$114,826.67 seized from personal account number ending in 5372 in JP Morgan Chase Bank.

The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- f. Approximately \$29,781.79 seized from personal account number ending in 4743 and personal account number ending in 1317. Both accounts were held at Huntington Federal Savings Bank.
- g. Approximately \$9,627.27 seized from personal account number ending in 2878 at WesBanco Bank, opened August 9, 2013.
- h. Approximately \$1,606,353.51 seized from personal account number ending in 6498 at SunTrust Bank.

- i. Approximately \$114,826.67 seized from personal account number ending in 5372 in JP Morgan Chase Bank.

MICHAEL B. STUART
United States Attorney

By 
KATHLEEN ROBESON
Assistant United States Attorney