

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FILED

Jun 25 2025
Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

CRIMINAL COVER SHEET

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. Patrick Omeife

CASE NUMBER: 3:25-cr-00175 JSC

CR

Is This Case Under Seal?

Yes

No ☒

Total Number of Defendants:

1 ☒

2-7

8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes

No ☒

Venue (Per Crim. L.R. 18-1):

SF ☒

OAK

SJ

Is this a potential high-cost case?

Yes

No ☒

Is any defendant charged with a death-penalty-eligible crime?

Yes

No ☒

Is this a RICO Act gang case?

Yes

No ☒

Assigned AUSA
(Lead Attorney): Kristina Green

Date Submitted: 6/24/2025

Comments:

United States District Court
FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

Jun 25 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

Patrick Omeife

DEFENDANT(S).

INDICTMENT

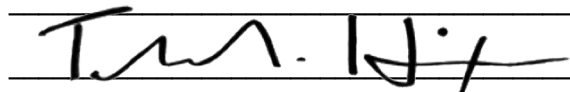
18 U.S.C. §§ 1956 & 2 – Money Laundering
18 U.S.C. § 982(a)(1) & 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury
Foreman

Filed in open court this 24th day of
June, 2025.

Rose Maher

 Clerk

Bail, \$ Warrant

Hon. Thomas Hixson, U.S. Magistrate Judge

1 CRAIG H. MISSAKIAN (CABN 125202)
2 United States Attorney

3 LORINDA LARYEA
4 Acting Chief
5 Criminal Division, Fraud Section
6 U.S. Department of Justice
7
8

FILED

Jun 25 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,) CASE NO. 3:25-cr-00175 JSC
13)
14 Plaintiff,) VIOLATIONS:
15) 18 U.S.C. §§ 1956 & 2 – Money Laundering
16 v.) 18 U.S.C. § 982(a)(1) & 28 U.S.C. § 2461(c) –
17) Forfeiture Allegation
18 PATRICK OMEIFE,)
19) SAN FRANCISCO VENUE
20 Defendant.)
21)
22)
23)
24)
25)
26)
27)
28)

INDICTMENT

21 The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

23 At all times relevant to this Indictment:

24 1. Defendant PATRICK OMEIFE (“OMEIFE”), in the Northern District of California and
25 elsewhere, conducted a financial transaction involving the proceeds of specified unlawful activity,
26 knowing that the property involved in the financial transaction represented the proceeds of some form of
27 unlawful activity, and with the intent to conceal the carrying on of the specified unlawful activity.
28

INDICTMENT

1 THE DEFENDANT AND RELEVANT INDIVIDUALS

2 2. Defendant OMEIFE resided outside the United States and used alias “Peter Calderon.”

3 3. Victim 1 resided in the Northern District of California.

4 4. Victim 2 resided in the Southern District of New York.

5 THE CARES ACT PROVIDER RELIEF FUND

6 5. In March 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security
7 (“CARES”) Act, which was designed to provide emergency financial assistance to the millions of
8 Americans suffering due to the COVID-19 pandemic.

9 6. The CARES Act appropriated funds to help health care providers (“Providers”) that were
10 financially impacted by COVID-19, as well as to provide care to patients who were suffering from
11 COVID-19 and compensate Providers for the cost of that care (the “Provider Relief Fund” or “PRF”).
12 The United States Department of Health and Human Services (“HHS”), through its agency the Health
13 Resources and Services Administration (“HRSA”), oversaw and administered the Provider Relief Fund.

14 7. Providers applied for Provider Relief Fund distributions through the online Provider
15 Relief Fund Attestation and Application Portal. During the PRF application process, applicants
16 submitted information that HHS used to determine their eligibility for PRF payments, correspond with
17 the provider, and otherwise administer the PRF program. Required application information included,
18 but was not limited to, tax ID number, name as shown on the Provider’s income tax return, National
19 Provider Identifier (“NPI”) number, contact person name, contact person phone number, contact person
20 email, revenue amounts, supporting documents, bank name, ABA routing number, account holder name,
21 and account number.

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FRAUDULENT PROVIDER RELIEF FUND APPLICATIONS

8. In or around July 2022, HRSA identified a group of suspicious PRF applications that exhibited characteristics indicative of fraud, including generic email domain names, near-identical supporting documents across applications, identical dollar amounts for listed incomes, and repeating bank account numbers. Investigation by the HHS Office of Inspector General identified additional PRF applications with the same indicators of fraud. Through investigation of the bank accounts connected to the fraudulent PRF applications, federal law enforcement identified at least \$1.6 million of fraudulent disbursements of funds related to COVID-19 relief programs stemming from the identified group of applications.

9. Victim #1 was an optometrist who maintained an optometry practice in the Northern District of California. On September 17, 2020, a fraudulent application purportedly from Victim #1 on behalf of Victim #1's optometry practice was submitted to HRSA for a Provider Relief Fund distribution. The application contained Victim #1's name and the taxpayer identification number and NPI number for Victim #1's practice. The application also contained a bank account number for an account owned by Victim #2, who is unknown to Victim #1. Victim #1 did not submit or have knowledge of this application. As a result of the fraudulent application, on or about October 16, 2020, approximately \$33,765 was transferred from the Provider Relief Fund purportedly for Victim #1 to the bank account identified on the application, which was owned by Victim #2.

10. Victim #2 believed that she was in an online romantic relationship with OMEIFE, who communicated with Victim #2 using the alias “Peter Calderon.” OMEIFE, as “Peter Calderon,” told Victim #2 that he was a covert government agent, which required him to receive funds through Victim #2’s bank account. At OMEIFE’s direction, Victim #2, via a cryptocurrency exchange based in the Northern District of California, converted \$32,500 of the \$33,765 Provider Relief Fund disbursement sent to her bank account into the cryptocurrency known as Bitcoin. Subsequently, through transactions on October 27 and 28, 2020, Victim #2 transferred approximately \$35,000 of Bitcoin to a separate cryptocurrency account controlled by OMEIFE.

11. The cryptocurrency account that received the Bitcoin from Victim #2 was owned by “Patrick OMEIFE.” The cryptocurrency exchange that maintained OMEIFE’s account periodically requested identity verification from OMEIFE. In response to these identity verification requests, OMEIFE provided the cryptocurrency exchange with images of his driver’s license issued by the Republic of Ghana, identifying himself as Patrick OMEIFE. Additionally, OMEIFE accompanied the driver’s license pictures with “selfie” pictures of his face and bare upper body, depicting a distinctive tattoo on his chest corresponding to the Bitcoin currency symbol.

COUNT ONE:

(18 U.S.C. § 1956(a)(1)(B)(i) – Concealment Money Laundering)

12. Paragraphs 1 through 11 of this Indictment are re-alleged and incorporated as if fully set forth here.

13. On or about the dates set forth below, in the Northern District of California and elsewhere, the defendant,

PATRICK OMEIFE,

aided and abetted by others known and unknown to the Grand Jury, did knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, that is, identity theft and wire fraud, in violation of Title 18, United States Code, Sections 1028 and 1343, respectively, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct the financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

Count	Approximate Date	Approximate Amount	Description of Financial Transaction
1	10/27/2020	\$27,364.44	Transfer of Bitcoin from Victim #2’s account to OMEIFE’s cryptocurrency account
2	10/28/2020	\$7,442.70	Transfer of Bitcoin from Victim #2’s account to OMEIFE’s cryptocurrency account

Each in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Section 2.

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33. The allegations contained in this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(7) and Title 28, United States Code, Section 2461(c).

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

- a. cannot be located upon 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,

All pursuant to Title 18, United States Code, Section 982(a)(1), Title 28, United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

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1 DATED: June 24, 2025

A TRUE BILL.

2
3 /s/
4 FOREPERSON
SAN FRANCISCO, CA

5 CRAIG H. MISSAKIAN
6 United States Attorney

7
8 /s/ Kristina Green
9 KRISTINA GREEN
Assistant United States Attorney

10 LORINDA LARYEA
11 Acting Chief
12 Criminal Division, Fraud Section
U.S. Department of Justice

13
14 /s/ S. Babu Kaza
15 S. BABU KAZA
16 Trial Attorney, Fraud Section
U.S. Department of Justice

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

18 U.S.C. §§ 1956 & 2 - Money Laundering
 18 U.S.C. § 982(a)(1) & 28 U.S.C. § 2461(c) - Forfeiture

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: Maximum of 20 years' imprisonment, maximum \$500,000 fine;
 three years supervised release; forfeiture; restitution; \$100
 special assessment per count

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

▶ Patrick Omeife

DISTRICT COURT NUMBER
 3:25-cr-00175 JSC

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Eric Panicucci, HHS-OIG

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW
DOCKET NO.

☐ this prosecution relates to a
 pending case involving this same
 defendant

MAGISTRATE
CASE NO.

☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person
 Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned)

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior
 summons was served on above charges ▶

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
 been filed? ☐ No

If "Yes"
 give date
 filed

**DATE OF
 ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
 TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

PATRICK OMEIFE

Case No.3:25-cr-00175 JSC

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

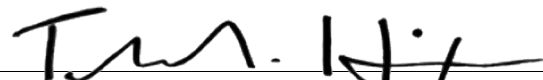
YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) PATRICK OMEIFE,
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Counts 1 and 2 (18 U.S.C. § 1956) (money laundering)

Date: 06/24/2025


Issuing officer's signature

City and state: San Francisco, CA

Hon. Thomas S. Hixson, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: PATRICK OMEIFE

Known aliases: Peter Calderon; Veny Calderon; Cindy Barrett

Last known residence: Republic of Ghana

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 01/27/1992

Social Security number: _____

Height: _____ Weight: _____

Sex: Male Race: African

Hair: Black Eyes: Brown

Scars, tattoos, other distinguishing marks: Tattoo of Bitcoin currency symbol on left pectoral muscle

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: HHS-OIG Special Agent Eric Panicucci; FBI Special Agents Jason Willis and Doug McBride

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____