

AUG 07 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

By:  JAMES N. HATTEN, Clerk
Deputy Clerk

UNITED STATES OF AMERICA

v.

ONOSEMERAJA IDODO-UMEH,
aka "B," "Blast," and "Sese"

Criminal Indictment

No. **1 : 1 8 - C R - 3 0 8**

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Defendant ONOSEMERAJA IDODO-UMEH, also known as "B," "Blast," and "Sese," resided in the Northern District of Georgia.
2. "Umeh & Sons LLC" was a business entity owned and controlled by defendant IDODO-UMEH in furtherance of the conspiracy.
3. "Sahchi LLC" was a business entity owned and controlled by co-conspirator C.O. in furtherance of the conspiracy.
4. Bank of America is a financial institution insured by the Federal Deposit Insurance Corporation.
5. JPMorgan Chase is a financial institution insured by the Federal Deposit Insurance Corporation.
6. "Personal Identifying Information," or "PII," is any name or number that may be used, alone or in conjunction with any other information, to identify

a specific individual. Examples of PII include, but are not limited to, a person's name, date of birth, address, and social security number.

7. A "payment processor" is a business that facilitates credit card payments to merchants by customers. Payment processors allow business owners to establish "merchant accounts," which are specialized accounts that permit a business to accept credit card and debit card payments and then transfer the funds into the business owner's bank account.

8. Intuit Inc. is a payment processor. Intuit requires business owners to provide certain PII to establish a merchant account to ensure that the business owner is an actual person.

COUNT ONE

Conspiracy to Commit Wire Fraud and Bank Fraud
(18 U.S.C. § 1349)

9. Beginning on a date unknown to the Grand Jury, but no later than in or about April of 2011, and continuing until an unknown date, but until at least in or about March of 2018, in the Northern District of Georgia and elsewhere, the defendant, ONOSEMERAJA IDODO-UMEH, did knowingly and willfully combine, conspire, confederate, and agree with C.O., O.I.U., M.S.Y., C.L.R., B.B., E.W., J.P., G.D., and with others known and unknown to the Grand Jury, to commit the following offenses against the United States:

a. Wire fraud in violation of Title 18, United States Code, Section 1343; that is, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, to transmit and cause to be transmitted in interstate and foreign commerce certain wire communications for the purpose of executing the scheme and artifice; and

b. Bank fraud in violation of Title 18, United States Code, Section 1344; that is, to knowingly execute and attempt to execute a scheme and artifice to obtain funds under the custody and control of financial institutions by means of false and fraudulent pretenses and representations.

Manner and Means of the Conspiracy

10. The primary purpose of the conspiracy was for defendant IDODO-UMEH and others to enrich themselves by obtaining money through fraudulent means.

11. In furtherance of the conspiracy, defendant IDODO-UMEH and co-conspirators would use cell phones to communicate with one another.

12. In furtherance of the conspiracy, defendant IDODO-UMEH would use the email account "fizo1232003@hotmail.com" to communicate with co-conspirators and to store and transfer stolen PII, credit card numbers, and bank and treasury check images.

13. In furtherance of the conspiracy, defendant IDODO-UMEH and others would recruit new members to open personal bank accounts in the recruits' own names and provide IDODO-UMEH and other conspirators the account number and password to allow them access. IDODO-UMEH and others would use those accounts to obtain, store, and transfer fraud proceeds. The account holders would receive a percentage of the fraud proceeds as compensation. Account holders were encouraged to recruit even more new members in order to further grow the size of the fraud network.

14. In furtherance of the conspiracy, defendant IDODO-UMEH and others would execute "Merchant Account Schemes" as follows:

a. IDODO-UMEH and others would obtain stolen PII, belonging to actual persons, for use in the fraud scheme.

b. IDODO-UMEH and others would use the stolen PII, belonging to actual persons, to open fictitious merchant accounts with payment processors.

c. IDODO-UMEH and others would obtain stolen credit card and debit card numbers for use in the fraud scheme.

d. IDODO-UMEH and others would use the stolen credit card and debit card numbers to make fraudulent unauthorized payments to the fictitious merchant accounts.

e. IDODO-UMEH and others would transfer funds from the merchant accounts into bank accounts controlled by members of the conspiracy.

f. IDODO-UMEH and others would withdraw the fraudulently obtained funds from the bank accounts.

15. In furtherance of the conspiracy, defendant IDODO-UMEH and others would execute "Check Schemes" as follows:

a. IDODO-UMEH and others would obtain and create stolen and counterfeit checks.

b. IDODO-UMEH and others would deposit the stolen and counterfeit checks into bank accounts controlled by members of the conspiracy.

c. IDODO-UMEH and others would withdraw and transfer money from the bank accounts before the banks could discover that the checks were illegitimate.

16. In furtherance of the conspiracy, defendant IDODO-UMEH and others would protect their fraudulent activities from detection, including by:

a. Using pre-paid debit cards, such as T-Mobile Visa cards, to store money and conduct transactions under false names;

b. Using false identities when sending funds through money-transfer services such as Western Union;

c. Dividing money transfers into multiple smaller transactions, conducted at multiple different locations, to avoid suspiciously large dollar amounts;

d. Transferring fraud proceeds from the United States to Nigeria through one channel, and then promptly back to the United States through a different channel, while stating on the transfer documents vague reasons such as "UPKEEP," "WELFARE," and "BUYING OF VEHICLES."

Overt Acts

17. In order to accomplish the objects of the conspiracy, defendant IDODO-UMEH and co-conspirators committed overt acts in furtherance of the conspiracy, including but not limited to the following:

18. At various times, including on or about April 26, 2011, defendant IDODO-UMEH met with co-conspirator M.S.Y. for the purpose of planning, explaining, and conducting the fraud schemes.

19. At various times, including on or about May 3, 2011, defendant IDODO-UMEH caused fraud proceeds to be sent to Nigeria via Western Union.

20. In or about the spring and summer of 2013, defendant IDODO-UMEH and co-conspirators undertook a Check Scheme relating to "O V Collection" as detailed in part below:

a. Prior to May of 2013, co-conspirator C.L.R. opened a bank account with Bank of America in the business name "O V Collection Clothing Company," account number ending in 9646 (the "9646 Account").

b. On or about May 2, 2013, co-conspirator C.L.R. sent a text message containing the account number, routing number, username, and password for the 9646 Account to co-conspirator M.S.Y.

c. On or about May 4, 2013, co-conspirator M.S.Y. forwarded the text message containing the 9646 Account information to IDODO-UMEH.

d. On or about June 12, 2013, a conspirator deposited into the 9646 Account a forged check in the amount of \$9,900 from victim corporation A.C.L., with an address in Norcross, GA.

e. On or about November 9, 2013, a conspirator sent IDODO-UMEH an email containing victim corporation A.C.L.'s name, along with an address and routing number identical to the address and routing number on the check deposited into the 9646 Account.

21. In or about September of 2013, defendant IDODO-UMEH and co-conspirators undertook a Check Scheme relating to "Bright Star" as detailed in part below:

a. Prior to September of 2013, co-conspirators B.B. and M.B. opened a business bank account with Bank of America in the name of "Bright Star," account number ending in 9120 (the "9120 Account").

b. On or about September 5, 2013, IDODO-UMEH sent to a co-conspirator an email that contained the phrase "THE COMPANY ACCOUNT," followed by B.B.'s name and address, and the account number for the 9120 Account.

c. On or about September 9, 2013, a conspirator attempted to deposit a forged check made out to "Bright Star" into the 9120 Account, in the amount of \$77,500 from the bank account of victims P.W. and V.W.

d. On or about September 10, 2013, a conspirator attempted to deposit a forged check made out to "Bright Star" into the 9120 Account, in the amount of \$48,900 from the bank account of victim corporation G.T.S.

e. On or about September 13, 2013, a conspirator attempted to deposit a forged check made out to "Bright Star" into the 9120 Account, in the amount of \$9,900 from the bank account of victim R.V.

22. In or about October of 2013, defendant IDODO-UMEH and co-conspirators perpetrated a Merchant Account Scheme relating to "Synergy Renovataion" [sic] as detailed in part below:

a. Prior to October of 2013, co-conspirator E.W. opened a personal bank account with Bank of America, account number ending in 3066 (the "3066 Account").

b. On or about October 5, 2013, co-conspirator E.W. sent a text message containing the username and password for the 3066 Account to co-conspirator M.S.Y., who forwarded the message to IDODO-UMEH.

c. On or about October 11, 2013, a conspirator used the PII of victim J.H., without J.H.'s permission, to open an Intuit merchant account in the business name "Synergy Renovataion" (the "Synergy Account").

d. On or about October 21, 2013, a conspirator caused Intuit to process two fraudulent payments to the Synergy Account totaling \$2,464.70: one payment in the amount of \$1,250.00 from the credit card of D.C., ending in 0799, without D.C.'s permission; and one payment in the amount of \$1,214.70 from the credit card of P.S., ending in 3157, without P.S.'s permission.

e. On or about October 22, 2013, a conspirator transferred \$2,464.70 from the Synergy Account to the 3066 Account.

f. On or about October 23, 2013, IDODO-UMEH sent the following text message to co-conspirator M.S.Y.: "This gat 2300 in it WD: [XXXXXXXXXX]3066," referring to the 3066 Account belonging to co-conspirator E.W. Immediately thereafter, co-conspirator M.S.Y. placed a phone call to E.W.

g. On or about October 23, 2013, co-conspirator E.W. withdrew \$2,385 from the 3066 Account.

h. On or about October 25, 2013, IDODO-UMEH sent the following text message to co-conspirator M.S.Y.: "Pay \$1800 to sahchi llc Business acct: [XXXXXXXXXX]7469[.] Then d rest 4650 to [co-conspirator C.O.] [XXXXXXXXXX]6968[.]"

i. On or about October 25, 2013, a conspirator deposited \$1,700 into Bank of America account number XXXX-XXXX-7469, a business account in the name "Sachi LLC;" and \$4,630 into Bank of America account number XXXX-XXXX-6968, a personal account belonging to co-conspirator C.O.

23. On or about July 1, 2014, defendant IDODO-UMEH listened on the phone while co-conspirator M.S.Y. threatened to kill co-conspirator J.P. because IDODO-UMEH and M.S.Y. believed J.P. was stealing fraud proceeds from them.

24. In or about December of 2014, defendant IDODO-UMEH and co-conspirators perpetrated a Merchant Account Scheme relating to “Four Seasons Custom Tailoring” [sic] as detailed in part below:

a. Prior to December of 2014, co-conspirator G.D. opened a personal bank account with Bank of America, account number ending in 9643 (the “9643 Account”).

b. On or about December 1, 2014, a conspirator used the PII of victim C.B., without C.B.’s permission, to open an Intuit merchant account in the business name “Four Seasons Custom Tailoring” (the “Four Seasons Account”).

c. On or about December 1, 2014, a conspirator processed a fraudulent payment to the Four Seasons Account of \$1,298 from the credit card of S.M., ending in 1009, without S.M.’s permission.

d. On or about December 1, 2014, co-conspirator G.D. sent a text message containing the account number and routing number for the 9643 Account to co-conspirator M.S.Y., who forwarded the message to IDODO-UMEH.

e. On or about December 2, 2014, a conspirator transferred \$1,298 from the Four Seasons Account to the 9643 Account.

f. On or about the morning of December 3, 2014, IDODO-UMEH sent the following text message to co-conspirator M.S.Y.: "He gat \$2200 in his act," and forwarded to M.S.Y. the account information for the 9643 Account. Immediately thereafter, M.S.Y. forwarded the message "He gat \$2200 in his act" to co-conspirator G.D.

g. On or about December 3, 2014, co-conspirator G.D. withdrew \$1,221.86 from the 9643 Account.

h. On or about the afternoon December 3, 2014, IDODO-UMEH sent to co-conspirator M.S.Y. the text message "When can I pick up the little thing," and then placed two phone calls to M.S.Y., and then sent M.S.Y. the text message "Come bro I gat to make the bank mennnn."

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

COUNTS TWO THROUGH ELEVEN

Wire Fraud

(18 U.S.C. § 1343 and § 2)

25. The Grand Jury re-alleges and incorporates by reference the factual allegations in Paragraphs 1-8 and 10-24 of this Indictment as if fully set forth herein.

26. On or about each of the dates listed below, in the Northern District of Georgia and elsewhere, defendant ONOSEMERAJA IDODO-UMEH, aided and abetted by others known and unknown to the grand jury, knowingly devised and

intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises, and by omission of material facts, well knowing and having reason to know that said pretenses, representations, and promises were false and fraudulent when made and caused to be made and that said omissions were and would be material, and in so doing did cause to be transmitted by means of wire communication in interstate commerce the writings, signals, and sounds described below, each transmission constituting a separate count, and all of which affecting a financial institution:

Count	Date	Description
2	8/16/2012	Payment of \$932 to "Grayhawk Window Systems"
3	8/17/2012	Transfer of \$1,827 from "Grayhawk Window Systems" to Bank of America account ending in 5594
4	9/5/2013	Email of "Bright Star" account information from IDODO-UMEH to co-conspirator for fraudulent check deposit
5	10/21/2013	Payment of \$1,250 to "Synergy Renovataion"
6	10/21/2013	Payment of \$1,214.70 to "Synergy Renovataion"
7	10/22/2013	Transfer of \$2,464.70 from "Synergy Renovataion" to Bank of America account ending in 3066
8	11/26/2014	Payment of \$1,299 to "HW Roofing Concepts"
9	11/27/2014	Transfer of \$1,299 from "HW Roofing Concepts" to Bank of America account ending in 2533
10	12/1/2014	Payment of \$1,298 to "Four Seasons Tayloring"
11	12/2/2014	Transfer of \$1,298 from "Four Seasons Tayloring" to Bank of America account ending in 9643

All in violation of Title 18, United States Code, Section 1343 and Section 2.

COUNTS TWELVE THROUGH SIXTEEN

Aggravated Identity Theft
(18 U.S.C. § 1028A and § 2)

27. The Grand Jury re-alleges and incorporates by reference the factual allegations in Paragraphs 1-8 and 10-24 of this Indictment as if fully set forth herein.

28. On or about each of the dates specified below in Column B, in the Northern District of Georgia and elsewhere, defendant ONOSEMERAJA IDODO-UMEH, aided and abetted by others known and unknown to the grand jury, did knowingly transfer, possess, and use, without lawful authority, the means of identification of other persons, that is, the defendant knowingly used the names, addresses, and social security numbers of actual persons, specified below in Column C, to open the fictitious merchant accounts listed below in Column D, during and in relation to the corresponding federal wire fraud and fraud offenses charged in this Indictment and referenced in Column E below:

A	B	C	D	E
Count	Date	Actual Person	Fictitious Merchant Account	Related Counts
12	10/11/13	J.H.	Synergy Renovataion	1, 5, 6, 7
13	1/31/14	S.S.	4978 Louisville Housekeeping Services	1
14	8/27/14	K.H.	Hines Roofing Services	1
15	11/24/14	H.H.	HW Roofing Concepts	1, 8, 9
16	12/1/14	C.B.	Four Seasons Custom Tayloring	1, 10, 11

All in violation of Title 18, United States Code, Section 1028A and Section 2.

COUNT SEVENTEEN
Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956)

29. The Grand Jury re-alleges and incorporates by reference the factual allegations in Paragraphs 1-8 and 10-24 of this Indictment as if fully set forth herein.

30. Beginning on a date unknown to the Grand Jury, but no later than in or about April of 2011, and continuing until an unknown date, but until at least in or about March of 2018, in the Northern District of Georgia and elsewhere, the defendant, ONOSEMERAJA IDODO-UMEH, did knowingly and willfully combine, conspire, confederate, and agree with C.O., O.I.U., M.S.Y., C.L.R., B.B., E.W., J.P., G.D., and with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

a. to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity — that is, wire fraud and bank fraud — with the intent to promote the carrying on of specified unlawful activity — that is, wire fraud and bank fraud — and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form

of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

b. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity — that is, wire fraud and bank fraud — knowing that the transactions were 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 such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

c. to transport, transmit and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(A); and

d. to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds involving the proceeds of specified unlawful activity — that is, wire fraud and bank fraud — from a place in the United States to and through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer 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, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

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

COUNT EIGHTEEN
Unlawful Procurement of Naturalization
(18 U.S.C. § 1425)

31. The Grand Jury re-alleges and incorporates by reference the factual allegations in Paragraphs 1-8 and 10-24 of this Indictment as if fully set forth herein.

32. On or about May 13, 2011, in the Northern District of Georgia, defendant ONOSEMERAJA IDODO-UMEH knowingly attempted to procure and did procure, contrary to law, his naturalization, by making materially false statements on his Application for Naturalization (form N-400) and during his sworn interview with Citizenship and Immigration Services, to wit: IDODO-UMEH stated that he had never committed a crime for which he was not arrested, when in truth and fact, as he well knew, he was at that time engaged in the fraud conspiracy described in this Indictment and had committed overt acts in furtherance of that criminal conspiracy.

All in violation of Title 18, United States Code, Section 1425(a).

FORFEITURE PROVISIONS

33. Upon conviction of one or more of the offenses alleged in Counts One through Eleven of this Indictment, the defendant, ONOSEMERAJA IDODO-UMEH, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(2); and Title 28, United States Code, Section 2461, all property, real and personal, constituting or derived from proceeds traceable to the offenses.

34. Additionally, upon conviction of the offense alleged in Count Eighteen of this Indictment, the defendant, ONOSEMERAJA IDODO-UMEH, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in said offense, and all property traceable to such property.

35. Finally, if, as a result of any act or omission of the defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

the United States intends, pursuant to Title 18, United States Code, Section 982(b)(1); Title 21, United States Code, Section 853(p); and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

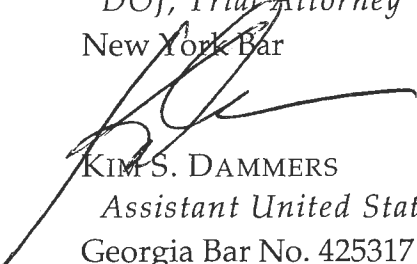
A True BILL

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