

SECRET

JTM (3)

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HENRY N. ASOMANI,
[DOB: 03/23/1985]

Defendant.



No. 18-00291-01-CR-W-HFS

COUNT ONE:

Conspiracy to Commit Wire Fraud

18 U.S.C. §§ 1343 & 1349
NMT 20 Years Imprisonment
NMT 3 Years Supervised Release
NMT \$250,000 Fine

COUNTS TWO & THREE:

Wire Fraud

18 U.S.C. §§ 1343 & 2
NMT 20 Years Imprisonment
NMT 3 Years Supervised Release
NMT \$250,000 Fine

COUNT FOUR:

Money Laundering Conspiracy

18 U.S.C. § 1956(h)
NMT 20 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release

COUNT FIVE and SIX:

Money Laundering

18 U.S.C. §§ 1957 & 2
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release

FORFEITURE ALLEGATIONS:

18 U.S.C. §§ 981(a)(1), 982(a), 28 U.S.C. § 2461
21 U.S.C. § 853

INDICTMENT

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Defendant HENRY N. ASOMANI owned, operated or was the registered agent for the following businesses:

a. Xtreme Custom LLC, formed on 01/27/2017, with an office listed as 3204 Jasper Hill Court, Dumfries, Virginia;

b. Elite Group Custom LLC, formed on 02/28/2016, with an office listed as 9532 Liberia Avenue, Suite 723, Manassas, Virginia;

c. Crystal Custom LLC, formed on 12/30/2014, with an office listed as 6501 Tower Drive, Apt. 102, Alexandria, Virginia;

d. Ringle Custom Auto LLC, formed on 04/26/2014, with an office listed as 6501 Tower Drive, Apt. 102, Alexandria, Virginia; and

e. Mega Auto Custom LLC, formed on 06/19/2012, with an office listed as 6501 Tower Drive, Apt. 102, Alexandria, Virginia.

2. Defendant HENRY N. ASOMANI opened and had signatory power over the following bank accounts:

a. Mega Auto Custom LLC, Navy Federal Credit Union account numbers XX6597 & XX4908;

b. Mega Auto Custom LLC, Bank of America account numbers XX6359 & XX5105;

c. Crystal Custom LLC, M & T Bank account numbers XX8245 & XX9456;

d. Crystal Custom LLC, PNC account number XX3444;

e. Elite Group Custom LLC, Industrial Bank account numbers XX6699 & XX3433;

- f. Henry Asomani, Navy Federal Credit Union account numbers XX4761 & XX0493;
 - g. Henry Asomani, PNC Bank account numbers XX7019, XX2224, & XX7491;
 - h. Henry Asomani, M&T Bank account number XX8237;
 - i. Henry Asomani, Pentagon Federal Credit Union account number XX7022;
- and
- j. Henry Asomani, US Bank account number XX1955;

COUNT ONE

3. Paragraphs 1 and 2 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

4. From on or about September 15, 2015 through October 17, 2017, in the Western District of Missouri, and elsewhere, the defendant HENRY N. ASOMANI, and other persons known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit offenses against the United States, that is having devised and intending to devise a scheme for obtaining money by means of materially false and fraudulent pretenses, representations, and promises, transmitted or caused to be transmitted by means of wire communications in interstate commerce writings, signs and signals for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

Manner and Means of the Conspiracy

5. Unknown co-conspirators would target individuals through online dating websites with various romance frauds. The unknown co-conspirators would impersonate individuals who were involved in businesses overseas. The unknown co-conspirators would convince the victims

that they needed funds to help with moving gold from a foreign country, orphanage expenses, and school and travel expenses. The co-conspirators told the victims they would share the profits when the gold was returned to the United States. In fact, none of the victims received any profit or received any gold from the co-conspirators.

6. Victim number 1 (V1) resides in the Western District of Missouri. V1 set up a profile on ChristianMingle.com following the death of her husband to brain cancer. In October 2015, an individual claiming to be “Larry B. White” initiated contact with V1. Following numerous conversations by email and telephone, “White” convinced V1 to invest in a Ghana gold mine. “White” promised a 40% return to V1 for the investment of money. From November 2015, through January 2016, under the direction of “White”, V1 sent funds to multiple entities by check and wire from Lee’s Summit, Missouri, totaling approximately \$3,292,000. Of that amount, the following transfers were made to accounts controlled by defendant HENRY N. ASOMANI:

Date	Method	Bank	Account Name	Account Number	Amount
11/05/2015	Wire	Navy Federal CU	Mega Auto Custom LLC	6597	\$70,000
11/12/2015	Wire	Navy Federal CU	Mega Auto Custom LLC	6597	\$70,000
11/19/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$50,000
11/19/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$50,000
11/24/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$70,000
11/25/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$70,000
11/25/2015	Check	Bank of America	Mega Auto Custom LLC	5105	\$60,000
12/01/2015	Check	Bank of America	Mega Auto Custom LLC	5105	\$50,000
12/01/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$50,000
12/03/2015	Check	Bank of America	Mega Auto Custom LLC	5105	\$80,000
12/03/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$80,000
12/14/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$90,000
12/14/2015	Check	Bank of America	Mega Auto Custom LLC	5105	\$90,000
12/15/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$90,000
12/15/2015	Check	Bank of America	Mega Auto Custom LLC	5105	\$90,000
12/16/2015	Check	Bank of America	Mega Auto Custom LLC	5105	\$90,000
12/16/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$90,000
12/16/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$40,000
12/21/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$90,000

12/21/2015	Check	Bank of America	Mega Auto Custom LLC	5105	\$90,000
12/21/2015	Check	Bank of America	Mega Auto Custom LLC	5105	\$51,000
12/21/2015	Check	Bank of America	Mega Auto Custom LLC	6359	\$51,000
01/19/2016	Check	Bank of America	Mega Auto Custom LLC	5105	\$138,500
01/19/2016	Check	Bank of America	Mega Auto Custom LLC	5105	\$138,500
01/22/2016	Check	Bank of America	Mega Auto Custom LLC	6359	\$151,000
01/22/2016	Check	Bank of America	Mega Auto Custom LLC	5105	\$151,000
01/22/2016	Check	Bank of America	Mega Auto Custom LLC	6359	\$151,000
Total					\$2,292,000

To date, V1 has not received any money or gold profits from “White”.

7. Victim number 2 (V2) lives in Bridgewater, New Jersey. V2 met “Antonio” through an online dating site chemistry.com. “Antonio” convinced V2 to send money for gold and gold mine-related expenses such as machine repairs, labor, and shipping. V2 had a total loss of approximately \$250,000. Of that amount, V2 sent \$60,000 to Mega Auto Custom LLC Bank of America account XX6539 between September 15, 2015, and December 2, 2015.

8. Victim number 3 (V3) is a resident of Anchorage, Alaska. V3 met “Dickey James” on Match.com. “James” convinced V3 to send money for gold -related expenses such as customs, taxes and shipping. V3 had a total loss of approximately \$137,369. Of that amount, V3 sent approximately \$72,828 by two wire transfers to Pentagon Federal Credit Union account X7022, in the name of HENRY ASOMANI, on October 24, 2015, and October 31, 2015. “James” promised to send V3 gold in exchange for the gold -related expense payments. To date, V3 has not received any gold from “James”.

9. Victim number 4 (V4) resides in Norman, Oklahoma. V4 met “Steve Stankovich” on Match.com. “Stankovich” convinced V4 to send money for personal assistance and oil investment issues such as customs. Between December 31, 2015, and July 10, 2017, V4 had a total loss of approximately \$80,000. Of that amount, V4 sent a total of \$66,126 to accounts in the

name of Henry Asomani, Mega Auto Custom, Crystal Custom LLC, and Elite Group Custom. On January 6, 2016, V4 sent \$10,000 via check to HENRY ASOMANI's Navy Federal Credit Union account X0493. On January 29, 2016, V4 sent \$25,045 via check to Crystal Custom LLC, PNC Bank account X3444. On February 5, 2016, V4 sent \$7,372 to HENRY ASOMANI's PNC Bank account X7019. "Stankovich" promised to pay V4 back, and to send V4 the profits from the oil investment. To date, V4 has not received any money back or oil profits from "Stankovich".

10. Victim number 5 (V5) resides in Lakeland, Florida. V5 met "Greg Van Hoof" on Match.com. "Van Hoof" convinced V5 to send money to assist in orphanage repairs and shipping expenses for gold. V5 had a total loss of approximately \$19,500. Of that amount, V5 deposited \$11,500 via 3 checks into Mega Auto Custom LLC, Bank of America account X5105, on January 7, 19, and 21, 2016.

11. Victim number 6 (V6) resides in Melbourne, Florida. V6 met "Greg Van Hoof" on Match.com. "Van Hoof" convinced V6 to send money to assist in orphanage repairs and shipping expenses for gold. V6 had a total loss of approximately \$35,000. Of that amount, V6 deposited \$2,500 cash into Mega Auto Custom LLC, Bank of America account X5105, on January 7, 2016. "Van Hoof" promised to ship gold to V6's house. To date, V6 has not received any gold from "Van Hoof".

12. Victim number 7 (V7) resides in Fairbanks, Alaska. V7 met "David Dickey" on Eharmony.com or Match.com. "Dickey" convinced V7 to send funds to form a partnership in a gold mining business. V7 had a total loss of \$86,200. On February 10, 2016, V7 wired \$50,000 to HENRY ASOMANI's Navy Federal credit Union account X 4761. On February 19, 2016, V7 wired \$36,200 to HENRY ASOMANI's Navy Federal Credit Union account X 4761. To date,

the partnership between “Dickey” and V7 was never formed and V7 has not received any money back from “Dickey”.

13. Victim number 8 (V8) resides in North Fort Myers, Florida. V8 met “James Van Cole”, aka “James Van Hoff” on Eharmony.com. Van Cole convinced V8 to send funds for vehicle repairs and funeral expenses. V8 had a total loss of approximately \$225,000. Of that amount, V8 wired \$40,000 to the Mega Auto Custom LLC account at Navy Federal Credit Union, account number X 6597, on February 10, 2016. “Van Cole” promised to pay V8 back for the expenses. To date, V8 has not received any money from “Van Cole”.

14. Victim number 9 (V9) resides in Hurst, Texas. V9 met “Greg Van Hoof” on Eharmony.com. “Van Hoof” convinced V9 to send funds for orphanage repair and gold related expenses. V9 had a total loss of approximately \$57,500. Of that amount, V9 sent \$52,500 by three wire transfers to the Crystal Custom LLC bank account at M & T Bank, account number X 8245, on May 4, 13 and 18, 2016. “Van Hoof” promised to pay V9 back with money from the gold. To date, V9 has not received any money from “Van Hoof”.

15. Victim number 10 (V10) resides in Ottawa, Kansas. V10 met “James Macovedder” on an online dating website. “Macovedder” convinced V10 to send funds for orphanage repairs and gold related expenses. On July 15, 2016, V10 wired \$10,000 to the Crystal Custom LLC, M & T Bank, account number X8245. “Macovedder” promised V10 a share of the gold. To date, V10 has not received any gold from “Macovedder”.

16. Victim number 11 (V11) resides in Newhall, Iowa. V11 met “Danny Heinrich” on Match.com. “Heinrich” convinced V11 to send funds for school expenses, travel expenses and customs fees for a bag with contents worth millions of dollars. V11 had a total loss of approximately \$60,000. Of that amount, V11 sent three wire transfers totaling \$55,000 to

US Bank, account number 1955, in the name of Henry Asomani. The three wire transfers occurred on November 8, 9 and 15, 2016. "Heinrich" promised to pay V11 back with the contents of the bag. To date, V11 has not received any money from "Heinrich" or a bag with contents worth millions of dollars.

17. Victim number 12 (V12) resides in Leawood, Kansas. V12 met "George Bill Parker" on Facebook. "Parker" convinced V12 to send funds for gold related expenses such as legal fees, customs, storage, farm related expenses and ransom. "Parker" promised V12 that he would pay V12 back with money or gold. V12 had a total loss of approximately \$800,000. Of that amount, V12 sent approximately \$220,700 to accounts in the name of Mega Auto Custom LLC, Crystal Custom LLC, and HENRY ASOMANI. Between March 2017 and October 2017, V12 sent \$110,700 via PayPal to accounts in the names of Mega Auto Custom LLC and Crystal Custom LLC. On July 21, 2017, V12 wired \$50,000 to Pentagon Federal Credit Union account X7022, in the name of HENRY ASOMANI. On August 18, 2017, V12 wired \$60,000 to US Bank account X 1955, in the name of HENRY ASOMANI. To date, V12 has received no money or gold from "Parker".

18. Victim number 13 (V13) resides in Kansas City, Missouri. V13 met "Bradley Fischer" on ChristianMingle.com. "Fischer" convinced V13 to send funds for school expenses, travel expenses and to start a new life in Kansas City. On July 19, 2017, V13 wired \$24,000 to US Bank account X 1955, in the name of HENRY ASOMANI. "Fischer" promised to pay V13 back when he got to Kansas City. To date, V13 received \$1,000 back from "Fischer".

19. Between September 15, 2015 and October 17, 2017, HENRY ASOMANI received a total of \$2,993,354 in the banks accounts listed above because of the scheme.

20. Of the \$2,993,354 received due to the scheme, between November 1, 2015, and March 7, 2016, defendant HENRY ASOMANI received a total of \$2,498,617 in the bank accounts listed above. Between November 1, 2015 and March 7, 2016, defendant HENRY ASOMANI wired \$1,789,416.71 from his bank accounts listed above to bank accounts in Ghana.

21. Between November 1, 2015 and March 7, 2016, defendant HENRY ASOMANI spent approximately \$342,278 on auto purchases and auto- or shipping-related expenses. Over the same time, defendant HENRY ASOMANI shipped 18 vehicles to Accra, Ghana, having a declared value of approximately \$284,190.

22. Between November 1, 2015 and March 7, 2016, defendant HENRY ASOMANI spent approximately \$331,339 of the funds received from the fraud scheme, including but not limited to:

- a. \$88,402 in cash or cashier's checks;
- b. \$36,873 to other Asomani-controlled accounts;
- c. \$23,589 in Paypal expenditures;
- d. \$23,293 in retail expenses;
- e. \$20,218 to T.M.C.C. car loan payments (Toyota Motor Credit Corporation);
- f. \$17,654 to Marie Ackah (HENRY ASOMANI's fiancé);
- g. \$6,429 in utilities;
- h. \$5,860 in bank fees;
- i. \$5,341 in entertainment, food, and travel expenses;
- j. \$4,639 in taxes or government fees; and,
- k. \$4,597 in education expenses

All in violation of Title 18, United States Code, Sections 1349 & 1343.

COUNTS TWO and THREE
Wire Fraud

23. Paragraphs 1, 2, 5, and 6 of this Indictment are re-alleged and incorporated by reference as more fully set forth herein.

24. On or about the dates listed below, in the Western District of Missouri, and elsewhere, defendant HENRY ASOMANI, aided and abetted by persons known and unknown to the Grand Jury, for the purpose of executing the afore-described scheme and artifice to defraud V1, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<u>Count</u>	<u>Date</u>	<u>From</u>	<u>To</u>	<u>Amount</u>
2	11/05/2015	Hawthorne Bank Account No. X 1872 Lee's Summit, Missouri	Mega Auto Custom LLC Navy Federal CU Account No. X 6597 Alexandria, Virginia	\$70,000
3	11/12/2015	Hawthorne Bank Account No. X 1872 Lee's Summit, Missouri	Mega Auto Custom LLC Navy Federal CU Account No. X 6597 Alexandria, Virginia	\$70,000

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

COUNT FOUR
Money Laundering Conspiracy

25. Beginning at an unknown date, but from at least September 15, 2015 and continuing to at least on or about October 17, 2017, the exact date being unknown to the Grand Jury, in the Western District of Missouri and elsewhere, defendant HENRY ASOMANI did knowingly combine, conspire, agree, and have a tacit understanding with others known and unknown to the Grand Jury to commit an offense against the United States, that is, to knowingly engage in

monetary transactions by, through, and to a financial institution, affecting interstate or foreign commerce, that is wire transfers of United States currency, knowing that said transactions involved criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, including but not limited to wire fraud, in violation of Title 18, United States Code, Section 1957.

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

COUNTS FIVE & SIX
Money Laundering

26. The allegations in paragraphs 1 through 24 of this indictment are re-alleged and incorporated as if fully set forth herein.

27. On or about the dates set forth below, in the Western District of Missouri and elsewhere, defendant HENRY N. ASOMANI, and others known and unknown to the grand jury, knowingly engaged in, attempted to engage in and caused to be engaged in, a monetary transaction affecting interstate or foreign commerce, that is, the withdrawal, deposit and transfer of funds from and to the financial institutions identified below, in criminally derived property of a value greater than \$10,000 derived from specified unlawful activity, including but not limited to wire fraud, to wit:

Count	Date	Type	From	To	Amount
5	11/12/2015	Check	Mega Auto Custom LLC Navy Federal CU Account X6597 (Alexandria, Virginia)	Mega Auto Custom LLC Bank of America Account X6359 (Alexandria, Virginia)	\$20,000
6	11/13/2015	Wire	Mega Auto Custom LLC Bank of America Account X6359 (Alexandria, Virginia)	Have Mercy Automobile Access Bank Account X9011 (Accra, Ghana)	\$23,385

All in violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE ALLEGATIONS

26. The allegations of Counts One through Three of this Indictment are re-alleged and fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property, real and personal, in which the defendant has an interest, pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), and Title 28, United States Code, Section 2461, and the procedures outlined in Title 21, United States Code, Section 853.

27. Upon conviction of any violation of Title 18, United States Code, Sections 1343 and 1349, the defendant shall forfeit to the United States any property, real or personal, constituting, or derived from, or traceable to proceeds the person obtained directly or indirectly pursuant to Title 18, United States Code, Sections 981(a)(1) and (a)(2).

28. The property subject to forfeiture includes, but is not limited to, the following:

- a. Money Judgment and Other Property Involved In or Traceable to the Offenses:

Any interest or proceeds traceable thereto of at least \$2,993,354, representing the proceeds obtained by defendant HENRY ASOMANI, in that such sum in aggregate is involved in, or is derived from, proceeds traceable to the offenses set forth in Counts One through Three;

- b. a 2019 silver Lexus NX300, VIN JTJBARBZ5K2180053.

29. The allegations of Counts Four through Six of this Indictment are re-alleged and fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property, real and personal, in which the defendant has an interest, pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

30. Upon conviction of any violation of Title 18, United States Code, Sections 1956 and 1957, the defendant shall forfeit to the United States any property, real or personal, constituting, or derived from, or traceable to proceeds the person obtained directly or indirectly pursuant to Title 18, United States Code, Sections 981(a)(1) and (a)(2).

31. The property subject to forfeiture includes, but is not limited to, the following:

a. Money Judgment and Other Property Involved In or Traceable to the Offenses:

Any interest or proceeds traceable thereto of at least \$2,993,354, representing the proceeds obtained by defendant HENRY ASOMANI, in that such sum in aggregate is involved in, or is derived from, proceeds traceable to the offense set forth in Count Four and a 2019 silver Lexus NX300, VIN JTJBARBZ5K2180053 in that the 2019 silver Lexus NX300 is involved in, or is derived from, proceeds traceable to the offense set forth in Count Four;

Any interest or proceeds traceable thereto of at least \$20,000, representing the proceeds obtained by defendant HENRY ASOMANI, in that such sum in aggregate is involved in, or is derived from, proceeds traceable to the offense set forth in Count Five; and

Any interest or proceeds traceable thereto of at least \$23,385, representing the proceeds obtained by defendant HENRY ASOMANI, in that such sum in aggregate is involved in, or is derived from, proceeds traceable to the offense set forth in Count Six;

SUBSTITUTE ASSETS

32. If the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the above-forfeitable property or to seek return of the property to the jurisdiction of the Court so that the property may be seized and forfeited.

All pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1), 982(a)(1), and Title 28, United States Code, Section 2461, and the procedures outlined in Title 21, United States Code, Section 853(p).

A TRUE BILL.


FOREPERSON OF THE GRAND JURY


Paul S. Becker
Assistant United States Attorney

Dated: 10/23/18
Kansas City, Missouri