

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONAYERIN K. OGOLOR,
[DOB: 01/15/1969]

Defendant.

Case No. _____

COUNT ONE:

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

NMT 20 Years Imprisonment and/or a fine of

NMT \$20,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNTS TWO through NINE:

Money Laundering

18 U.S.C. § 1956

NMT 20 Years Imprisonment and/or a fine of

NMT \$500,000 Fine or twice the value of the
property involved in the transaction

NMT 3 Years Supervised Release

Class C Felony

COUNTS TEN through FIFTEEN:

Money Laundering

18 U.S.C. § 1957

NMT 10 Years Imprisonment and/or a fine of

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNT SIXTEEN:

Unlawful Procurement of Citizenship

18 U.S.C. § 1425(b)

NMT 10 Years

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

REVOCACTION OF CITIZENSHIP

8 U.S.C. § 1451(e)

ALLEGATIONS OF CRIMINAL
FORFEITURE

\$100 Mandatory Special Assessment Each
Count

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

The Scheme

1. From 2013 to the date of this Indictment, Ronayerin Ogolor lived in the Western District of Missouri. From 2013 to the date of this Indictment, Ogolor participated in a wire fraud and money-laundering conspiracy targeting people, some of them elderly, in search of companionship or romance through online websites such as Facebook, ChristianMingle.com, or Hangout.com. The perpetrators of the romance scams created several profiles on online dating sites. The conspirators then contacted men and women throughout the United States, Canada, and Europe, with whom they cultivated a sense of affection and often romance.

2. Having established relationships with the victims, the perpetrators of the romance scams ultimately requested money: for hospital fees; travel fees; ‘customs expenses;’ ‘gold import taxes;’ or investment opportunities. The conspirators directed the victims to wire transfer or deposit money into various accounts, including accounts established and maintained by Ogolor. Often after the victims transferred money into the specified accounts, conspirators claimed more money was needed, ‘to release the package’ or ‘to pay customs expenses’ on money or gold.

3. On other occasions, the conspirators fraudulently obtained checks through business email compromise, and had the victims deposit the checks into their accounts and wire and deposit money into various accounts, including accounts established and maintained by Ogolor. In a business email compromise, the conspirators hack into a business email account, and then send an email from what appears to be an employee with authority to approve payments, instructing that a check be disbursed in the victim’s name and sent to the victim. By using victims to deposit the checks and distribute the money, the conspirators distanced themselves from the business email hacking and fraud.

4. In furtherance of the scheme and conspiracy, Ogolor opened and maintained a series of bank accounts. Some of the accounts were in his name and some were in business names. Ogolor provided false information to the banks regarding the businesses, including the businesses' primary activity. Victims, following the directions of unknown co-conspirators, wired or deposited money into the accounts established by Ogolor. Upon receipt of the money, Ogolor withdrew some of the proceeds in cash and wired some of the proceeds to other accounts in the United States and overseas.

COUNT ONE
(Wire Fraud Conspiracy)

5. The allegations contained in Paragraphs 1 through 4 of this Indictment are alleged and incorporated by reference.

6. From on or about 2014 through the date of this Indictment, in the Western District of Missouri and elsewhere, defendant RONAYERIN OGOLOR and other persons both 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 State Code, Section 1343.

Overt Acts

7. In furtherance of the conspiracy and to accomplish the object of the conspiracy, one or more members of the conspiracy committed and caused to be committed the following overt acts in the Western District of Missouri and elsewhere.

8. In furtherance of the scheme and conspiracy, Ogolor opened several bank accounts in his name and in the name of sham businesses. The romance fraud victims wired and deposited their money and money from counterfeit or fraudulently obtained checks into Ogolor's accounts. Soon after receiving the fraudulently obtained wires or deposits, Ogolor wired money to co-conspirators and/or withdrew the money in cash.

a. US Bank, from December 2010 to May 2016, Ogolor maintained accounts in his name in numbers ending 8969 and 1885. Ogolor was the sole signature authority on the accounts. US Bank closed Ogolor's accounts in May 2016.

b. Wells Fargo, from July 2016 to September 2016, Ogolor maintained a business account in the name Ronayerin Ogolor dba 'Ronayerin Ogolor Merchandise,' number ending 6281. Ogolor was the sole signature on this account and classified 'Ogolor Merchandise' as engaged in the sales business, specifically, 'buying cards.' From August 16, 2016 to September 2016, Ogolor maintained a business account in the name 'Ovrichona,' number ending 2141. Ogolor classified 'Ovrichona' as partnership engaged in 'overseas auto sales.' Ogolor and a co-conspirator had signature authority on account number ending 2141. Wells Fargo closed Ogolor's accounts in September 2016.

c. Bank of America, from February 2012 to March 2017, Ogolor maintained an American Quarter Horse Association eBanking account in his name, number ending 6776. From June 2016 to March 2017, Ogolor had business accounts in the name 'Ogolor Merchandise,' account numbers ending 4957 and 1988. Ogolor classified 'Ogolor Merchandise' as engaged in the sales business, specifically, 'buying cards.' Ogolor was the sole signature authority on all accounts. Bank of America closed Ogolor's accounts in March 2017.

d. Bank Midwest, from October 2017 to the date of this Indictment, Ogolor maintained a business account in the name 'Rons Solutions,' number ending 6726. Ogolor

classified 'Rons Solutions' with Bank Midwest as a Beauty Salon. Ogolor told a Bank Midwest official in September 2018 that he bought goods in the United States, such as cars and diapers, and shipped them to Nigeria. Ogolor is the sole signature authority on the accounts.

9. For tax years 2012 - 2017, Ogolor filed joint personal tax returns with the Internal Revenue Service, and reported only his and his wife's W-2 (earned wages) income. Ogolor did not declare as a business receipt, nor pay taxes on, any of the funds wire transferred and deposited into his accounts by fraud victims. He filed no federal business income tax returns for his sham businesses Ogolor Merchandise or Ovrichona.

10. Ogolor made eight payments to AlcudaBill through his US Bank account number ending 1885. AlcudaBill is a payment processor that handles payments to various online dating websites. Ogolor made two payments to Badoo, an online dating website.

11. For years 2013 - 2018, the following approximate amounts of fraudulently obtained funds were wire transferred and deposited into Ronayerin Ogolor's various bank accounts.

2013: \$750
2014: \$14,500
2015: \$17,500
2016: \$586,622.16
2017: \$195,427.08
2018: \$63,690
Total: \$878,489.24

12. As detailed below, all of the victims lived in states other than Missouri or a different country, and conducted the described financial transactions where they lived, wiring money from their state or country to Ogolor's accounts in the Western District of Missouri. Thus, the wire transfers described below occurred in interstate commerce.

Victims and Wire Transfers

13. In 2014, Victim 1, an Alabama resident, met a person she believed to be Charles Zolt on the online dating website ChristianMingle.com. “Zolt” told Victim 1 that he was working on an oil rig. “Zolt” asked Victim 1 for money so that he could travel home and for charity. At “Zolt’s” suggestion, Victim 1 sold her car for \$9,500. On August 12, 2014, Victim 1 wired \$4,500 and on August 15, 2014, she wired \$5,000, both to Ogolor’s Bank of America account number 6776. The money Victim 1 wired to Ogolor’s account was not used for “Zolt’s” travel or charity.

14. In February 2015, Victim 2, a widow and Ohio resident, met a man she believed to be Bradley Majestic on the online dating website ChristianMingle.com. “Majestic” said he was a widower working on an oil rig in Texas. Victim 2 and “Majestic” texted and talked on the phone a few times. “Majestic” spoke English with an accent and claimed to have been born in Belgium.

15. In March 2015, “Majestic” asked Victim 2 to send him money because his bank account was frozen. On March 5, 2015, Victim 2 wired \$3,500 to Ogolor’s US Bank account number 1885. On March 10, 2015, Victim 2 wired \$4,000 to Ogolor’s US Bank account number 1885. On March 31, Victim 2 wired \$6,500 to Ogolor’s US Bank account number 1885. The money Victim 2 wired to Ogolor’s account was not used to unfreeze “Majestic’s” account. Victim 2 lost a total of about \$30,000 in the scheme.

16. Victim 3, a widow and Indiana resident, received a friend request on Facebook from a man she believed to be Lawrence Garrison. “Garrison” claimed to be a widower working on an oil rig off the coast of Louisiana. Victim 3 and “Garrison” communicated daily via Facebook messenger. Victim 3 and “Garrison” talked on the phone a few times. “Garrison” spoke English with an accent and claimed to have been born in Denmark.

17. Beginning in April 2015, “Garrison” told Victim 3 that he finished his contract on the oil rig, but couldn’t return home until he was paid. “Garrison” sent Victim 3 a photo of a \$4 million check, and said he would endorse it over to her for her help in paying his expenses until he could cash the check. “Garrison” also told Victim 3 that he needed money to pay customs, and to tow a \$500,000 drill head to Ohio. Victim 3 sent money to accounts designated by “Garrison” to help him with these requests.

18. In January 2016, “Garrison” told Victim 3 that he needed help paying his twelve workers. On January 28, 2016, Victim 3 wired \$6,000 to Ogolor’s US Bank account number 1885 and \$20,000 to Ogolor’s Bank of America account number 6776. On February 10, 2016, Victim 3 wired \$10,000 to Ogolor’s US Bank account number 1885 and \$10,000 to Ogolor’s Bank of America account number 6776. The money Victim 3 wired to Ogolor’s accounts was not used to pay an oil rig crew. Victim 3 lost a total of about \$450,000 in the scheme.

19. Victim 4, a Washington resident, met a number of people online from 2014 to 2016, who emailed and text messaged him that he could receive amounts from \$400,000 to \$1 million if he would send payments to cover fees associated with the money transfers. At the direction of others, on August 10, 2016, Victim 4 deposited \$14,600 to Ogolor’s Wells Fargo account number 6281. After Victim 4 deposited the money, the people who instructed him to send it told him that additional fees were required. The money Victim 4 deposited to Ogolor’s account was not used to pay fees associated with transferring money to Victim 4.

20. In August 2016, Victim 5, a Minnesota resident, received a friend request on Facebook from a man she believed was David Stasiak. “Stasiak” told Victim 5 that he was a general contractor for Baytex Energy Corp. and he was going to California to spend several months working on an oil rig. On August 27, 2016, “Stasiak” asked Victim 5 to send \$2,550 via MoneyGram to a person in Minnesota because he had bought a large amount of gold and had to

pay taxes on it. “Stasiak” told Victim 5 that he had \$450,000 in his bank account but the account was locked due to the large amount of gold he had bought. Victim 5 sent \$1,650 on September 7, 2016, to an account for a tax to be paid to Qatar, and sent \$1,275 on September 14, 2016, for a tax to be paid to Turkey.

21. In mid-September 2016, “Stasiak” told Victim 5 that he needed help paying the taxes on the \$6 million worth of gold he had bought in order to get it into the United States. On September 19, 2016, Victim 5 received a text message from “PayPoint Deliveries” requesting \$32,000 for a package sitting in customs in Hartsfield Airport in Atlanta, Georgia. “Stasiak” told Victim 5 that he negotiated the price down to approximately \$24,000. “PayPoint Deliveries” requested that Victim 5 send money to Ogolor Merchandise, Bank of America account number 4957. Victim 5 did not send the money, because her bank told her sending money to pay taxes on imported gold was a scam.

22. In 2013, Victim 6, an Arizona resident, met a woman on an online dating website who he believed to be Samantha Brown, living in Australia. In 2015 or 2016, “Brown” told Victim 6 that she had received a \$250,000 inheritance from her mother and she intended to use the money to renovate her house. “Brown” asked Victim 6 to deposit the check into his account and make three distributions: \$60,000 to Haxzades Auto, LLC; \$80,000 to Ronnie Leon Hammers; and \$70,000 to Wells Fargo account number 2141, Ronayerin Ogolor dba Ovrichona Company. “Brown” also asked Victim 6 to withdraw \$11,000 of the \$250,000 in cash, and wire the money to two individuals in Nigeria. The \$250,000 check was fraudulently obtained by a business email compromise in which an unknown person hacked into a capital management company, and using the comptroller’s email address, instructed that a \$250,000 check be drawn and mailed to Victim 6. The \$70,000 that Victim 6 distributed to Ogolor’s account was not used to renovate “Samantha Brown’s” house.

23. Around November 2015, Victim 7, a Texas resident, met a man online who she believed to be James Philip. 'Philip' told Victim 7 he was a widower and U.S. Army general deployed in Afghanistan. 'Philip' asked Victim 7 for money to help two cases containing \$5 million in cash through various stages of customs. At "Philip's" direction, Victim 7 made three wire transfers totaling \$88,000 into Ogolor's Bank of America account number 4957: 1) \$20,000 on September 27, 2016; 2) \$28,000 on October 21, 2016; and 3) \$40,000 on November 23, 2016. Victim 7 lost at least \$300,000. The money Victim 7 sent to Ogolor was not used to get cases through customs.

24. Victim 8, a Florida resident, received a friend request on Facebook from a man she believed to be Gary Ross Rodney. "Rodney" told Victim 8 that he was working overseas on an oil rig. Victim 8 communicated with "Rodney" via Skype and email. However, "Rodney" said he was not allowed to use the video function of Skype for "security reasons."

25. Around November 2016, "Rodney" told Victim 8 that he had a bank account in the United Kingdom worth approximately \$500,000. "Rodney" told Victim 8 that he was trying to withdraw the money but had to pay taxes on the withdrawal and asked for her help. "Rodney" told Victim 8 that he put the account in her name as an assurance that she would be repaid.

26. In November 2016, Victim 8 sold her home in Florida to secure the money requested by "Rodney." At "Rodney's" direction, on November 4, 2016, Victim 8 wired \$56,000; and on November 23, 2016, she wired \$65,000; both to the Ogolor Merchandise Bank of America account, number 4957. The money Victim 8 wired to Ogolor's account was not used to pay taxes on a United Kingdom bank account for "Gary Ross Rodney."

27. Victim 9, an Illinois resident, met a man she believed to be Manuel Rigby on Facebook. "Rigby" told Victim 9 he worked on an oil rig. He said he finished his job and was travelling with his earnings. In December 2016, "Rigby" told Victim 9 he had been detained in a

detention center in Atlanta, Georgia, because he had not properly recorded the money he was travelling with. A man identifying himself as “Pedro Martinez” called Victim 9. “Martinez” told Victim 9 he was a law enforcement officer, that he had a photograph of her, and her home address and phone number. “Martinez” arranged a phone call between Victim 9 and “Rigby.”

28. “Rigby” asked Victim 9 to send \$23,000 to get him out of jail. Victim 9 sent money via MoneyGram and Western Union. Victim 9 continued to send money because she was afraid and because she thought “Rigby” had not been released from the detention center. Among other payments, Victim 9 wired \$5,200 into Ogolor’s Bank of America account number 4957 on December 7, 2016. Victim 9 lost a total of about \$60,000. The money was not used to release “Rigby” from detention.

29. In February 2017, Victim 10, a Texas resident, met a man on an online dating website, either ChristianMingle.com or EHarmony.com, who she believed to be Jonathan Lester. “Lester” told Victim 10 that he was an engineer on an oil rig and lived in Atlanta. They communicated on Hangouts, a phone application. They talked once on the phone. “Lester” spoke English with an accent and claimed to be born in France.

30. “Lester” told Victim 10 that he had a box of money containing approximately \$2.75 million waiting for clearance through U.S. Customs. “Lester” told Victim 10 that U.S. Customs needed money to assure that the money being held was not involved in money laundering. “Lester” provided routing instructions via Hangouts message, and asked Victim 10 to send the money to a Bank of America account in the name Ogolor Merchandise, account number 4957. On May 2, 2017, Victim 10 sent a \$24,500 cashier’s check to the Ogolor Merchandise account.

31. “Lester” told Victim 10 that he needed more money to get the box of money out of U.S. Customs. On May 4, 2017, Victim 10 sent a \$91,900 cashier’s check to the Ogolor Merchandise account to get the money out of U.S. Customs. “Lester” said more money was

needed to release the funds. On May 10, 2017, Victim 10 withdrew \$10,000 in cash and deposited it into an account at “Lester’s” direction. On May 15, 2017, Victim 10 went to her bank to attempt to make a fourth money transfer. The bank manager talked to Victim 10 and told her this was possibly a fraud scheme and encouraged Victim 10 to contact the police. Victim 10 lost a total of about \$126,400. The money Victim 10 wired to Ogolor’s account was not used to pay customs expenses.

32. In approximately May 2017, Victim 11, a Florida resident, met a woman who he believed to be Linda Stout on Hangout.com, an online dating website. “Stout” told Victim 11 that she lived in Texas. “Stout” sent a \$6,500 check to Victim 11 and told him he could keep \$1,500 of the funds if he deposited the check into his account and transferred \$5,000 into the Ogolor Merchandise account at Bank of America, account number 4957. On May 12, 2017, Victim 11 withdrew \$5,000 in cash and deposited it into the Ogolor Merchandise account. The \$6,500 check was fraudulent.

33. In February 2018, Victim 12, an Italian resident and citizen, met a man on Facebook who she believed to be Alexander McFelix. Victim 12 communicated with “McFelix” via Hangout.com and Facebook messenger. “McFelix” told Victim 12 he was a U.S. soldier serving in Afghanistan who wanted to retire to be with his son in the United States. “McFelix” asked Victim 12 for a loan so he could retire early.

34. At the direction of “McFelix,” Victim 12 wired money to three accounts: 1) \$1,325 on March 26, 2018, to Vanessa.c.young account; 2) \$9,850 on April 10, 2018, to Ronayerin Ogolor dba Rons Solutions account at Bank Midwest; and 3) \$2,500 on April 16, 2018, to Classie Auto Brokers in Atlanta, Georgia. The money Victim 12 wired was not used to help “McFelix” retire from the U.S. military.

35. In August 2018 Victim 13, a California resident who does not speak English well, received a friend request on Facebook from a man she believed to be Robert Williams. “Williams” told Victim 13 that he was a widower working for an oil company in Saudi Arabia. “Williams” said his salary was paid in cash so he kept the cash, about \$2.6 million, in a box at a security company in Saudi Arabia.

36. In mid-August 2018, “Williams” told Victim 13 that his daughter in boarding school in the United States needed money, but “Williams” didn’t have access to his money. At “Williams’s” request, Victim 13 withdrew \$1,500 in cash and sent it via Priority Mail to Milwaukee, Wisconsin.

37. “Williams” then told Victim 13 that the security company holding his money had filed for bankruptcy. He said a diplomat, “Mr. Moses,” had agreed to help him transport his money from Saudi Arabia to the United States for a delivery fee. On August 28, 2018, at “Williams’s” request, Victim 13 wired \$10,960 to Ogolor’s Rons Solutions Bank Midwest account number 6726. “Williams” then told Victim 13 that “Mr. Moses” attempted to transport the money out of Saudi Arabia and was confronted by a customs officer, who demanded money to allow the currency out of Saudi Arabia. Therefore, on September 4, 2018, again at “Williams’s” request, Victim 13 wired \$30,000 to Ogolor’s same Rons Solutions Bank Midwest account.

38. “Williams” then told Victim 13 that the customs officer demanded more money. Therefore, on September 7, 2018, again at “Williams’s” request, Victim 13 wired approximately \$26,000 to a Citibank account in the name of Owurachanel LLC. Similarly, on September 8, 2018, again at “Williams’s” request, Victim 13 wired \$47,000 to an account in the name of BJs Global Sales. “Williams” next told Victim 13 that “Mr. Moses” had transported the money to the United States and that the money was in the Los Angeles Airport. “Williams” said that U.S. Customs demanded payment to release the money from its custody. Thus, on September 11,

2018, again at “Williams’s” request, Victim 13 wired \$120,000 to an account in the name Vinpep Services LLC. Again, on September 14, 2018, again at “Williams’s” request, Victim 13 wired \$65,000 to an account in the name of TLA Technology & Consulting LLC.

39. “Williams” next told Victim 13 that the September 8, 2018, \$47,000 wire transfer had not gone through. Thus, on September 15, 2018, again at “Williams’s” request, Victim 13 wired another \$47,000 to an account in the name Owurachanel LLC. A friend saw Victim 13’s Skype conversation with “Williams,” including the wire transfers, and talked to Victim 13. Victim 13 then realized she had been defrauded. Victim 13 last communicated with “Williams” on September 29, 2018. “Williams” requested more money for his daughter. Victim 13 told “Williams” that she had reported the wire transfers to the FBI. “Williams” responded that the FBI was lying and the wire transfers did not go through. Victim 13’s money was not used for “Williams’s” daughter, diplomat transfer fees, Saudi Arabian customs, nor U.S. customs. Victim 13’s total loss was \$347,460.

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

COUNTS TWO through NINE
(Money Laundering)

40. The allegations contained in Paragraphs 1 through 39 of this Indictment are re-alleged and incorporated by reference.

41. On or about following dates, in the Western District of Missouri, and elsewhere, the defendant, RONAYERIN OGOLOR, did knowingly conduct and attempt to conduct the financial transactions listed below, which involved the use of a financial institution that was engaged in, or the activities of which affected, interstate commerce, and which involved the proceeds of a specified unlawful activity, that is, including, but not limited to Conspiracy to Commit Wire Fraud and Wire Fraud, in violation of Title 18, United States Code, Sections 1349

and 1343, knowing that each transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such 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	Dates and Amounts of Fraudulent Wire/ Deposit	Date of Ogolor's Transactions	Transaction	Amount
2	8/12/14, \$4,500 wire from Victim 1	8/13/14	Cash withdrawal from Bank of America account # 6776	\$3,500
3	8/15/14, \$5,000 wire from Victim 1	8/18/14	Cash withdrawal from Bank of America account #6776	\$4,000
4	3/10/15, \$4,000 wire from Victim 2	3/11/15	Cash withdrawal from Bank of America account # 6776	\$2,800
5	1/28/16, \$20,000 wire from Victim 3	2/1/16	Cash withdrawal from Bank of America account # 6776	\$5,000
6	2/10/16, \$10,000 wire from Victim 3	2/11/16	Cash withdrawal from US Bank account #1885	\$7,000
7	9/1/16, \$70,000 deposit from Victim 6	9/2/16	Wire transfer from Wells Fargo account # 2141 to Changrong Industry account at Hang Seng Bank	\$50,000
8	11/23/16, \$65,000 wire from Victim 7 and \$40,000 from Victim 6	11/30/16	Wire transfer from Bank of America Account # 4957 to Gregory Akinbowale Lawson account at MSU Federal Credit Union	\$4,600
9	4/12/18, \$9,850 wire from Victim 12	4/16/18	Ogolor wrote a check to himself from Rons Solutions Bank Midwest account 6726	\$7,500

All in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

COUNTS TEN through FIFTEEN
(Money Laundering over \$10,000)

42. The allegations contained in Paragraphs 1 through 39 of this Indictment are re-alleged and incorporated by reference.

43. On or about the below-listed dates, in the Western District of Missouri and elsewhere, RONAYERIN OGOLOR, defendant herein, did knowingly engage and cause to be engaged in a monetary transaction, in or affecting interstate commerce, in criminally derived property of a value greater than \$10,000, with the funds represented by the transaction having been derived from a specified unlawful activity, to wit: conspiracy to commit wire fraud and wire fraud, and Ronayerin Ogolor knew said monetary transaction involved proceeds of a criminal offense, and so knowing, Ronayerin Ogolor conducted transactions in the below listed amounts.

Count	Dates and Amounts of Fraudulent Wires/Deposits	Date of Ogolor's Transactions	Transaction	Amount
10	10/21/16, \$28,000 wire from Victim 6	10/24/16	Wire transfer from Bank of America account #4957 to Ovrich Solutions, Santander Bank account #6714	\$18,000
11	11/4/16, \$56,000 wire from Victim 7	11/7/16	Wire transfer from Bank of America account # 4957 to Total Golf Construction, Inc., Wells Fargo account # 3605	\$56,000
12	11/23/16, \$65,000 wire from Victim 7 and \$50,000 from Victim 6	11/25/16	Wire transfer from Bank of America account #4957 to Daw Shipping Services, Suntrust Bank account # 2153	\$15,950
13	11/23/16, \$65,000 wire from Victim 7 and \$50,000 from Victim 6	11/25/16	Wire transfer from Bank of America account #4957 to Ovrich Solutions, Santander Bank account # 6714	\$35,000
14	11/23/16, \$65,000 wire from Victim 7 and \$40,000 from Victim 6	11/28/16	Wire transfer from Bank of America account #4957 to Pedro Diaz, Bank of America account # 6179	\$40,000
15	3/21/17 \$16,550 Counter credit and 3/22/17 \$14,865 return wire transfer	3/23/17	Wire transfer from Bank of America account # 4957 to Fastlane Logistics LLC, Brotherhood Bank & Trust account # 2508	\$14,865

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

Citizenship Fraud

44. The defendant, Ronayerin Ogolor, was born in Nigeria in 1969. He was admitted to the United States as a lawful permanent resident on March 31, 2009.

45. On or about October 20, 2014, defendant, Ronayerin Ogolor, completed a naturalization application (Form N-400) to become a United States citizen. Question 22 of Part 11 on page 15 stated: “Have you **ever** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **not** arrested?” (Emphasis in original.) Ronayerin Ogolor falsely checked the box marked “No” when in fact, Ronayerin Ogolor knew that he had committed the crimes of conspiracy to commit wire fraud, wire fraud, and money laundering.

46. On or about January 29, 2015, in the Western District of Missouri, a United States Citizenship and Immigration Services officer interviewed Ronayerin Ogolor to discuss and review defendant’s completed Form N-400. In that meeting, Ronayerin Ogolor specifically reaffirmed his answers on the completed form including the false response to question 22 of Part 11, again stating that he had never knowingly committed a criminal offense for which he had not been arrested.

47. On or about March 19, 2015, in the Western District of Missouri, Ronayerin Ogolor completed a Form N-445, entitled “Notice of Naturalization Oath Ceremony.” Question 3 of that form stated: “Since your interview, have you knowingly committed any crime or offense, for which you have not been arrested?” Ronayerin Ogolor placed a “√” in the box marked “No” and signed the Form N-445, falsely certifying that he had committed no crime between the date of his interview with Citizenship and Immigration Services (January 29, 2015) and the date he completed the Form N-445 (March 19, 2015) when in fact, the defendant knew he had committed the crimes of conspiracy to commit wire fraud, wire fraud, and money laundering.

48. On or about March 19, 2015, in the Western District of Missouri, Ronayerin Ogolor was sworn in as a United States citizen in an oath ceremony conducted by United States Citizenship and Immigration Services at the United States Courthouse in Kansas City, Missouri. Had Ogolor been truthful about his criminal activities, he would not have been granted United States citizenship.

COUNT SIXTEEN
(Unlawful Procurement of United States Citizenship)

49. The allegations contained in Paragraphs 1 through 48 of this Indictment are re-alleged and incorporated by reference.

50. On or about March 19, 2015, in the Western District of Missouri, the defendant, RONAYERIN OGOLOR, knowingly procured his naturalization as a United States citizen, to which he was not entitled. Defendant Ronayerin Ogolor obtained his citizenship despite having committed a criminal offense, by knowingly making a material false statement on his Form N-400, by knowingly making a material false statement to an immigration officer, and by knowingly making a material false statement on his Form N-445, each of which related to his criminal history and his good moral character, and each of which omitted the wire fraud conspiracy, wire fraud, and money laundering offenses which he had committed.

All in violation of Title 18, United States Code, Sections 1425(b).

Revocation of Citizenship

51. Upon defendant's conviction for unlawfully procuring his naturalization, in violation of 18 U.S.C. § 1425(b), as charged in Count Sixteen, defendant, Ronayerin Ogolor's March 19, 2015, naturalization shall, by Court order, be revoked, set aside, and declared void, and defendant's certificate of naturalization shall, by the same order, be cancelled. This is pursuant to 8 U.S.C. § 1451(e).

ALLEGATION OF WIRE FRAUD FORFEITURE

52. The allegations of Count One 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 in which the defendant has an interest, pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), Title 28, United States Code, Section 2461(c), and the procedures outlined in Title 21, United States Code, Section 853.

53. Upon conviction of any violation of Title 18, United States Code, Section 1349, defendant shall forfeit to the United States any property constituting, or derived from, proceeds the person obtained directly or indirectly pursuant to Title 18, United States Code, Sections 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and 982(a)(2)(A).

54. 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 \$878,489.24, representing the proceeds obtained by defendant Ronayerin Ogolor, in that such sum in aggregate is involved in, or is derived from, proceeds traceable to the offenses set forth in Count One.

- b. Substitute Assets:

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

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) 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)(C) and 982(a)(2)(A), Title 28, United States Code, Section 2461(c), and the procedures outlined in Title 21, United States Code, Section 853(p)

ALLEGATION OF MONEY LAUNDERING FORFEITURE

55. The allegations of Counts Two – Fifteen 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 in which the defendant has an interest, pursuant to the provisions of Title 18, United States Code, Section 982(a)(1)(E), and the procedures outlined in Title 21, United States Code, Section 853.

56. 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 constituting, or derived from, proceeds the person obtained directly or indirectly pursuant to Title 18, United States Code, Section 982(a)(1)(E).

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

a. **Money Judgment Involved In or Traceable to the Offenses:**

Any interest or proceeds traceable to the offenses set forth in Counts Two – Fifteen.

b. **Substitute Assets**

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

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) 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, Section 982(a)(1)(E) and the procedures outlined in Title 21, United States Code, Section 853(p)

A TRUE BILL.

/s/ Shannon Cassidy
FOREPERSON OF THE GRAND JURY

/s/ Kathleen D. Mahoney
Kathleen D. Mahoney
Assistant United States Attorney

Dated: 10/24/2018
Kansas City, Missouri

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

CRIMINAL CASE COVER SHEET

Division of Filing <input checked="" type="checkbox"/> Western <input type="checkbox"/> Central <input type="checkbox"/> Southwestern	<input type="checkbox"/> St. Joseph <input type="checkbox"/> Southern	Place of Offense <u>Jackson</u> County and elsewhere	Matter to be Sealed <input type="checkbox"/> Secret Indictment <input type="checkbox"/> Juvenile
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Defendant Information

Defendant Name Ronayerin Ogolor
 Alias Name _____
 Birthdate 01/15/1969

Related Case Information

Superseding Indictment/Information Yes No if yes, original case number _____
 New Defendant Yes No
 Prior Complaint Case Number, if any 18-mj-00154-LMC
 Prior Target Letter Case Number, if any _____

U.S. Attorney Information

AUSA Kathleen D. Mahoney

Interpreter Needed

Yes Language and/or dialect _____
 No

Location Status

Arrest Date _____
 Currently in Federal Custody
 Currently in State Custody
 Currently on Bond
 Writ Required Yes No
 Warrant Required Yes No

U.S.C. Citations

Total # of Counts 17

Set	Index Key/Code/Offense Level	Description of Offense Charged	Count(s)
1	18:1349.F/4700/4	Conspiracy to Commit Wire Fraud	1
2	18:1956-3300.F/3300/4	Money Laundering Conspiracy	2 - 9
3	18:1957-3300.F/3300/4	Money Laundering	10 - 15
4	18:1425.F/4970/4	Unlawful Procurement of Citizenship	16
5	8:1451	Revocation of Citizenship	
6	21:0853.F/6911/4	Criminal Forfeiture	

(May be continued on reverse)

Date 10/24/18 Signature of AUSA /s/ Kathleen D. Mahoney