



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD ISIOMA UGBAH,
aka "David Sanders,"

Defendant.

CR 17CR00636-RGK

I N F O R M A T I O N

[18 U.S.C. § 1349: Conspiracy to
Commit Wire Fraud]

The United States Attorney charges:

[18 U.S.C. § 1349]

A. THE OBJECT OF THE CONSPIRACY

1. Beginning on or before March 1, 2015, and continuing through on or about February 16, 2016, in Los Angeles County, within the Central District of California, and elsewhere, defendant RICHARD ISIOMA UGBAH, also known as ("aka") "David Sanders" ("UGBAH"), together with others known and unknown to the United States Attorney, knowingly combined, conspired, and agreed with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

1 B. THE MANNER AND MEANS OF THE CONSPIRACY

2 2. The object of the conspiracy was carried out, and was to be
3 carried out, in substance, as follows:

4 a. Co-conspirators known and unknown to the United States
5 Attorney would target individuals looking for romance ("romance-scam
6 victims") by creating fake dating profiles and fictitious personas on
7 popular Internet dating websites. Using their fake online personas,
8 the co-conspirators would falsely express strong romantic interest in
9 the romance-scam victims in order to develop an online relationship
10 and gain their trust.

11 b. After gaining their trust, defendant UGBAH and the co-
12 conspirators would concoct elaborate false stories to trick the
13 romance-scam victims into unwittingly acting as "money mules" by
14 allowing their bank accounts to be used for the wire transfer of
15 funds they thought were legitimately for their online "boyfriend" or
16 "girlfriend," but which, unbeknownst to the romance-scam victims, had
17 been stolen through a sophisticated "Business Email Compromise"
18 ("BEC") scheme involving the use of fraudulent emails to trick
19 businesses into making unauthorized wire transfers, as described
20 further below.

21 c. In concocting such elaborate false stories, co-
22 conspirators known and unknown to the United States Attorney, while
23 posing as the online "boyfriend" or "girlfriend," would usually claim
24 that he or she was working or detained overseas. Sometimes, the co-
25 conspirators acting as the online "boyfriend" or "girlfriend" would
26 falsely claim that they could not access a large inheritance or
27 offshore bank account from overseas and needed to use the romance-
28 scam victim's bank account to receive a wire transfer of funds.

1 d. To accomplish the BEC scheme involving the use of
2 fraudulent emails to trick victim businesses into making unauthorized
3 wire transfers, defendant UGBAH and co-conspirators known and unknown
4 to the United States Attorney would target businesses and do online
5 searches to obtain lists containing the names, titles and email
6 addresses for the Chief Executive Officers (CEO's) and the Chief
7 Financial Officers (CFO's) of potential victim businesses.

8 e. To further accomplish the BEC scheme, and while posing
9 as the online "boyfriend" or "girlfriend," co-conspirators known and
10 unknown to the United States Attorney would refer the romance-scam
11 victims to their purported financial advisor, "David Sanders"
12 (defendant UGBAH), so that defendant UGBAH could obtain the romance-
13 scam victim's bank account information to use them as money mules to
14 facilitate the transfer of stolen BEC funds through their bank
15 accounts.

16 f. Fraudulently posing as financial advisor "David
17 Sanders," defendant UGBAH would contact the romance-scam victims by
18 text, phone, and/or email purportedly on behalf of their online
19 "boyfriend" or "girlfriend" to facilitate the transfer of funds
20 through their bank accounts. Defendant UGBAH would corroborate the
21 elaborate false story of their online "boyfriend" or "girlfriend" and
22 instruct the romance-scam victims to provide their full bank account
23 information and other personal information in order for them to
24 receive a wire transfer purportedly for the benefit of their online
25 "boyfriend" or "girlfriend" when, in reality, the transferred funds
26 were stolen from a business as part of the BEC scheme.

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g. Defendant UGBAH would coordinate the transfer of funds into and out of the romance-scam victims' bank accounts with co-conspirators known and unknown to the United States Attorney.

h. Defendant UGBAH would provide co-conspirators known and unknown to the United States Attorney with the bank account and other information of the romance-scam victims, which the co-conspirators would then include in fraudulent emails to be sent to victim businesses as part of the BEC scheme.

i. Once UGBAH provided them with the name and bank account information of the romance-scam victims, co-conspirators known and unknown to the United States Attorney would send fraudulent emails to victim businesses to trick them into making unauthorized wire transfers into the romance-scam victims' bank accounts. The fraudulent emails would use "spoofed" email addresses fraudulently appearing to be from real email addresses belonging to those with authority to authorize the wire transfer of company funds, e.g., a President or CEO of the company, and would usually be sent to a CFO or other employee with the responsibility to send wire transfers for the victim company. The emails would provide instructions to wire a large sum of money for a purported legitimate business purpose to a specified bank account which, unbeknownst to the victim company, was actually the bank account of a romance-scam victim with whom defendant UGBAH had been communicating for the BEC scheme.

j. Defendant UGBAH would coordinate with co-conspirators who sent the fraudulent emails to verify receipt of the stolen BEC funds into the unwitting romance-scam victims' bank account. Defendant UGBAH would also instruct the romance-scam victims on transferring all or part of the (stolen BEC) funds from their

1 accounts into bank accounts owned by other unwitting romance-scam
2 victims or into fraudulently-opened bank accounts owned or controlled
3 by co-conspirators.

4 k. Defendant UGBAH would coordinate with co-conspirators
5 regarding further transfer of the stolen BEC funds.

6 C. OVERT ACTS

7 4. In furtherance of the conspiracy and to accomplish its
8 object, defendant UGBAH, together with other co-conspirators known
9 and unknown to the United States Attorney, on or about the dates set
10 forth below, committed, willfully caused others to commit, and aided,
11 abetted, counseled, commanded, induced and procured others to commit
12 the following overt acts, among others, within the Central District
13 of California and elsewhere:

14 BEC Victim Q.T. (Romance-Scam Victim: R.G.)

15 Overt Act No. 1: Sometime prior to March 31, 2015, a co-
16 conspirator met R.G. through an Internet dating website while posing
17 as "Josh Smith," who falsely claimed to R.G. that he had acquired a
18 loan from "David Sanders" to cover the legal costs from an automobile
19 accident..

20 Overt Act No. 2: On or about March 31, 2015, defendant UGBAH
21 emailed R.G. to obtain her bank information and when she would not
22 provide it, he obtained it from the co-conspirator posing as "Josh
23 Smith."

24 Overt Act No. 3: On or about March 31, 2015, unknown co-
25 conspirators sent a fraudulent email with a spoofed email address to
26 the Controller at Q.T. in Cerritos, California, purporting to be from
27 the CEO of Q.T. and instructing the Controller to process a wire
28 transfer in the amount of \$68,290 and to code it as "professional

1 expenses" and attaching wiring instructions to R.G.'s bank account in
2 the City of Industry, California.

3 Overt Act No. 4: As a result of the fraudulent email to Q.T.,
4 on or about March 31, 2015, defendant UGBAH and the unknown co-
5 conspirators caused the wire transfer of approximately \$68,290 from
6 Q.T.'s bank account to R.G.'s bank account.

7 Overt Act No. 5: On or about March 31, 2015, defendant
8 UGBAH, posing as "David Sanders," sent an email to R.G. instructing
9 R.G. to withdraw \$60,000 in cash, and to deposit the money into a
10 bank account owned by another unwitting romance-scam victim, E.E., in
11 Irvine, California.

12 BEC Victim Business W.A. (Romance-Scam Victim W.C.)

13 Overt Act No. 6: Sometime prior to June 30, 2015, a co-
14 conspirator who had met W.C. on an Internet dating website while
15 posing as "Terry Lee Ruggles" referred W.C. to his purported
16 financial advisor, "David Sanders" (defendant UGBAH) for assistance
17 in accessing his dormant offshore bank account while allegedly
18 working overseas.

19 Overt Act No. 7: On or about June 30, 2015, defendant UGBAH,
20 posing as financial advisor "David Sanders" on behalf of "Ruggles,"
21 contacted W.C. to obtain her bank account information.

22 Overt Act No. 8: On or about June 30, 2015, as a result of a
23 fraudulent email to W.A. containing W.C.'s bank account information,
24 defendant UGBAH and co-conspirators caused the wire transfer of
25 approximately \$54,000 from the bank account of BEC victim business
26 W.A. in North Carolina to W.C.'s bank account in New York.

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1 BEC Victim Business T.G.H. (Romance-Scam Victim S.R.)

2 Overt Act No. 9: In approximately April 2015, a co-
3 conspirator, who had met S.R. on an Internet dating website while
4 posing as "Chris Hill," referred S.R. to his purported financial
5 advisor, "David Sanders" (defendant UGBAH) for assistance in
6 purportedly accessing his offshore bank account in the Cayman
7 Islands.

8 Overt Act No. 10: Between April 2015 and July 1, 2015,
9 defendant UGBAH, posing as "David Sanders," contacted S.R. to
10 corroborate the false story and to obtain her bank account
11 information.

12 Overt Act No. 11: On or about July 1, 2015, as a result of a
13 fraudulent email to T.G.H. containing S.R.'s bank account
14 information, defendant UGBAH and co-conspirators caused the wire
15 transfer of approximately \$78,610 from the bank account of BEC victim
16 business T.G.H. in Atlanta, Georgia, to S.R.'s bank account in
17 Florida.

18 BEC Victim Business B.I. (Romance-Scam Victim M.G.)

19 Overt Act No. 12: On or before July 14, 2015, and posing as
20 financial advisor "David Sanders" on behalf of a co-conspirator,
21 defendant UGBAH fraudulently obtained the bank account information of
22 M.G. and provided it to co-conspirators.

23 Overt Act No. 13: On or about July 14, 2015, as a result of a
24 fraudulent email containing M.G.'s bank account information,
25 defendant UGBAH and co-conspirators caused the wire transfers of
26 approximately \$248,500 and \$290,000, respectively, from BEC victim
27 business B.I.'s bank account to M.G.'s bank account.

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1 BEC Victim Business I.C. (Romance-Scam Victim M.G.)

2 Overt Act No. 14: On or before July 14, 2015, and posing as
3 financial advisor "David Sanders" on behalf of a co-conspirator,
4 defendant UGBAH obtained the bank account information of M.G. and
5 provided it to co-conspirators.

6 Overt Act No. 15: In approximately August 2015, as a result of
7 a fraudulent email containing M.G.'s bank account information,
8 coconspirators and defendant UGBAH caused wire transfers totaling
9 approximately \$187,550 from BEC victim business I.C.'s bank account
10 to M.G.'s bank account.

11 BEC Victim Business S.B.E. (Romance-Scam Victim B.G.S.)

12 Overt Act No. 16: In approximately August 2015, a co-
13 conspirator who had met B.G.S. on an Internet dating website while
14 posing as "John Adams" referred B.G.S. to his purported financial
15 advisor, "David Sanders" (defendant UGBAH) for purported assistance
16 in getting payment owed to him by an employer in England.

17 Overt Act No. 17: On or about August 4, 2015, after obtaining
18 B.G.S.'s bank account information, defendant UGBAH, posing as "David
19 Sanders," emailed B.G.S. regarding an incoming wire transfer she
20 would be receiving into her account.

21 Overt Act No. 18: On or about August 10, 2015, as a result of
22 a fraudulent email to S.B.E. containing B.G.S.'s bank account
23 information, defendant UGBAH and co-conspirators caused the wire
24 transfer of approximately \$136,500 from the bank account of BEC
25 victim business S.B.E. in Fayetteville, North Carolina to B.G.S.'s
26 bank account in Beverly Hills, California.

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BEC Victim Business F.F.C. (Romance-Scam victim: A.S.)

Overt Act No. 19: In approximately August 2015, a co-conspirator who had met A.S. on an Internet dating website while posing as "Jesse Alfredo-Vita" referred A.S. to his purported financial advisor, "David Sanders" (defendant UGBAH), for purported assistance in funding an engineering project in Turkey.

Overt Act No. 20: On or about September 29, 2015, after sending A.S. fictitious documentation regarding his purported business relationship with the co-conspirator, defendant UGBAH, posing as "David Sanders," caused A.S. to send him an email providing defendant UGBAH with her bank account information.

Overt Act No. 21: On or about October 13, 2015, unknown co-conspirators sent a fraudulent email with a spoofed email address to the controller of business F.F.C. in Bristol, Tennessee, purporting to be from the CEO of F.F.C. and instructing the controller to process a wire transfer in the amount of \$43,350 to A.S.'s bank account.

Overt Act No. 22: On or about October 13, 2015, as a result of the fraudulent email to F.F.C., co-conspirators and defendant UGBAH caused the wire transfer of \$43,350 from BEC victim business F.F.C. in Bristol, Tennessee to A.S.'s bank account in Los Angeles, California.

Overt Act No. 23: On or about October 13, 2015, defendant UGBAH, posing as "David Sanders," emailed A.S. confirming that \$43,350 had been wired into her bank account.

Overt Act No. 24: On or about October 14, 2015, defendant UGBAH, posing as "David Sanders," sent an email to A.S. instructing

1 her to wire transfer \$43,000 (of the \$43,350) from her bank account
2 and into a co-conspirator's account.

3 BEC Victim Business N.C. (Romance-Scam victim: Y.R.)

4 Overt Act No. 25: In approximately November 2015, a co-
5 conspirator, who had met Y.R. through an Internet dating website
6 while posing as "Robert Spencer Alberto," referred Y.R. to his
7 purported financial advisor, "David Sanders" (defendant UGBAH), to
8 facilitate the transfer of money through Y.R.'s bank account.

9 Overt Act No. 26: On or about December 6, 2015, defendant
10 UGBAH, posing as "David Sanders," caused Y.R. to send him an email
11 providing him with Y.R.'s bank account information.

12 Overt Act No. 27: On or about December 7, 2015, unknown co-
13 conspirators sent a fraudulent email with a spoofed email address to
14 the Controller of business N.C. in Los Angeles, California,
15 purporting to be from the Chairman of N.C. and requesting the
16 Controller to process a wire transfer in the amount of \$44,650 to
17 Y.R.'s bank account.

18 Overt Act No. 28: On or about December 7, 2015, as a result of
19 the fraudulent email to N.C., defendant UGBAH and co-conspirators
20 caused the wire transfer of \$44,650 from N.C.'s bank account in Los
21 Angeles, California to Y.R.'s bank account in Kokomo, Indiana.

22 Overt Act No. 29: On or about December 8, 2015, defendant
23 UGBAH, posing as "David Sanders," instructed Y.R. to wire transfer
24 \$43,000 (of the \$44,650) from her bank account and into a co-
25 conspirator's bank account.

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1 BEC Victim Business C.D.S. (Romance-Scam Victim T.M.)

2 Overt Act No. 30: On or about December 24, 2015, unknown co-
3 conspirators sent a fraudulent email with a spoofed email address to
4 the CFO at C.D.S. in Beverly Hills, California, purporting to be from
5 the CEO of C.D.S. and instructing the CFO to process a wire transfer
6 in the amount of \$57,380, to code it as "professional expenses" and
7 to wire the funds to a Wells Fargo Bank ("WFB") account in Colorado.

8 Overt Act No. 31: As a result of their fraudulent email
9 communications to C.D.S., on or about December 24, 2015, the co-
10 conspirators caused the wire transfer of \$57,380 from C.D.S.'s bank
11 account in Los Angeles, California to bank account in Colorado.

12 Overt Act No. 32: Between on or about December 10, 2015 and on
13 or about December 28, 2015, a co-conspirator, who had met T.M.
14 through an Internet dating website while posing as "Lois Hurwitz,"
15 asked T.M. to accept \$250,000 on her behalf falsely claiming that it
16 would be coming from one of her business vendors in \$50,000
17 increments.

18 Overt Act No. 33: Believing that the earlier \$57,380 wire was
19 unsuccessful due to a bank error, on or about December 28, 2016, co-
20 conspirators sent another fraudulent email with a spoofed email
21 address to the CFO of C.D.S., instructing him to instead wire
22 transfer the funds to T.M.'s bank account in Los Angeles.

23 Overt Act No. 34: On or about December 29, 2015, defendant
24 UGBAH, posing as "Lois Hurwitz's" financial adviser, "David Sanders,"
25 sent a text message to T.M. with instructions to wire \$50,000 (of the
26 stolen BEC funds) to a co-conspirator.

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1 BEC Victim Business M.K. (Romance-Scam Victim S.C.)

2 Overt Act No. 35: On or about December 3, 2015, defendant
3 UGBAH, purportedly acting on behalf of an online friend, "Roseline
4 Ellis," caused S.C. to send him an email providing defendant UGBAH
5 with her bank account information.

6 Overt Act No. 36: On or about January 6, 2016, an unknown co-
7 conspirator sent a fraudulent email with a spoofed email address
8 purportedly from the Chairman of M.K. approving a wire transfer of
9 \$69,430 for payment to S.C. at a bank account in Virginia, which was
10 received by the CFO of M.K. for payment.

11 Overt Act No. 37: On or about January 6, 2016, as a result of
12 the fraudulent email sent to M.K., defendant UGBAH and the co-
13 conspirators caused a wire transfer of \$69,430 from M.K.'s bank
14 account in Minnesota to S.C.'s bank account in Virginia.

15 Overt Act No. 38: On or about January 7, 2016, based on
16 instructions provided to S.C. from defendant UGBAH, posing as
17 financial advisor "David Sanders," co-conspirators caused a wire
18 transfer of \$40,000 to be sent from S.C.'s bank account to a bank
19 account controlled by a co-conspirator.

20 BEC Victim Business T.T.T. (Romance-Scam Victim W.M.)

21 Overt Act No. 39: Sometime prior to January 22, 2016, a co-
22 conspirator, who had met W.M. on an Internet dating website while
23 posing as "Kate Carlson," falsely claimed to W.M. that she could not
24 access a \$5 million inheritance and referred W.M. to her purported
25 financial advisor, "David Sanders" (defendant UGBAH) for assistance
26 in accessing funds in an offshore bank account.

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1 Overt Act No. 40: On or about January 22, 2016, defendant
2 UGBAH, posing as financial advisor "David Sanders" on behalf of "Kate
3 Carlson," caused W.M. to send an email to defendant UGBAH confirming
4 W.M.'s bank account information, which W.M. sent to defendant UGBAH
5 at defendant UGBAH's request.

6 Overt Act No. 41: On or about January 27, 2016, unknown co-
7 conspirators sent a fraudulent email with a spoofed email address to
8 the Accounts Payable Supervisor at business T.T.T. in Michigan,
9 purporting to be from the CEO of T.T.T. and instructing the Accounts
10 Payable Supervisor to process a wire transfer in the amount of
11 \$83,670 to W.M.'s bank account in Florida.

12 Overt Act No. 42: On or about January 27, 2016, as a result of
13 the fraudulent email to T.T.T., defendant UGBAH and co-conspirators
14 caused the wire transfer of \$83,670 from BEC victim business T.T.T.
15 in Michigan to W.M.'s bank account in Florida.

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Overt Act No. 43: On or about February 2, 2016, co-conspirators sent a second fraudulent email with a spoofed email address to the Accounts Payable Supervisor at T.T.T., purporting to be from the CEO of T.T.T. and providing instructions to process a wire transfer in the amount of \$85,500 to W.M.'s bank account in Florida.

SANDRA R. BROWN
Acting United States Attorney

Peter F. D.

PATRICK R. FITZGERALD
Assistant United States Attorney
Chief, National Security Division

STEPHANIE S. CHRISTENSEN
Assistant United States Attorney
Chief, Cyber and Intellectual
Property Crimes Section

LISA E. FELDMAN
Assistant United States Attorney
Cyber and Intellectual Property
Crimes Section