

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

OCT 17 2017

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Kathy Row, DEPUTY

UNITED STATES OF AMERICA,)
)
 Plaintiff,)

-vs-

No. CR 17-246-D

NNAMDI FRANKLIN OJIMBA,)
)
 Defendant.)

Violations: 18 U.S.C. § 1349
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 2
18 U.S.C. § 1343
18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(2)(B)
18 U.S.C. § 1028(b)(5)
28 U.S.C. § 2461

INDICTMENT

The Federal Grand Jury charges:

COUNT 1

(Conspiracy to Commit Wire Fraud)

1. From on or about May 2014, and thereafter until in or about
January 2016, within the Western District of Oklahoma and elsewhere,

-----NNAMDI FRANKLIN OJIMBA -----

knowingly, intentionally, and with interdependence combined, conspired, and
agreed with other persons both known and unknown to the Federal Grand Jury to
commit the offense of wire fraud, in violation of Title 18, United States Code,
Section 1343.

OBJECT OF THE CONSPIRACY

2. It was the object of the conspiracy to obtain money by fraudulently inducing victims to wire transfer money to the defendant and his co-conspirators.

MANNER AND MEANS OF THE CONSPIRACY

3. The defendant and his co-conspirators used the following means, among others, to achieve the object of the conspiracy:

a. The defendant and his co-conspirators would open or cause to be opened user accounts on online dating websites using false profile information.

b. The defendant and his co-conspirators would use these false profiles to communicate with other users on the dating websites. This was done under the guise of forming an online relationship, but was actually for the purpose of attempting to scam money from the users with whom they communicated. In doing so, the defendant and his co-conspirators used false names, including "Edward Peter Duffey," used false biographical information, and claimed to be successful financial advisors or affiliated with charitable causes.

c. In order to further the illusion that a genuine relationship was developing and to gain the trust and confidence of their intended victims, the

defendant and his co-conspirators caused wire transmissions to be made in interstate commerce. These included telephone calls, cell phone text messages, messages through the dating website, and using the telephone and internet to order flowers to be delivered to their intended victims, accompanied by personalized messages.

d. As the online relationships progressed, the defendant and his co-conspirators would make inquiries about their potential victims' finances and investments. The defendant and his co-conspirators would claim to have inside information, such as knowledge that the investment firm used by the victim was under investigation by government authorities or was financially unsound, and used these false claims to persuade the victims that their money or investments were unsafe.

e. The defendant and his co-conspirators would then persuade the victims to wire money to them by promising to manage their money and investments for them. In reality, the defendant and his co-conspirators kept the victims' money for themselves.

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

COUNT 2
(Aggravated Identity Theft)

4. On or about March 13, 2015, in the Western District of Oklahoma and elsewhere,

-----NNAMDI FRANKLIN OJIMBA,-----

during and in relation to the offense charged in Count 1 of this Indictment, knowingly used without lawful authority the means of identification of another person, that being the name of H.F., which, along with a photograph of H.F., was used to create a profile on the dating site ChristianMingle.com.

All in violation of Title 18, United States Code, Section 1028A(a)(1) and Section 2.

COUNT 3
(Wire Fraud)

5. On or about May 11, 2015, within the Western District of Oklahoma and elsewhere,

-----NNAMDI FRANKLIN OJIMBA,-----

having knowingly devised and intended to devise a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and acting with intent to defraud, caused a wire transfer of money to be made in interstate and foreign commerce for the purpose of executing such scheme. Specifically, the defendant and his co-conspirators caused P.B., who was located in Oklahoma City, Oklahoma, to wire transfer \$500,000.00 from her bank account to an account at Barclays Bank in London.

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

COUNT 4
(Wire Fraud)

6. On or about May 14, 2015, within the Western District of Oklahoma and elsewhere,

-----**NNAMDI FRANKLIN OJIMBA**,-----

having knowingly devised and intended to devise a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and acting with intent to defraud, caused a wire transfer of money to be made in interstate and foreign commerce for the purpose of executing such scheme. Specifically, the defendant and his co-conspirators caused P.B., who was located in Oklahoma City, Oklahoma, to wire transfer \$501,000.00 from her bank account to an account at Barclays Bank in London.

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

FORFEITURE

A. The allegations contained in the Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

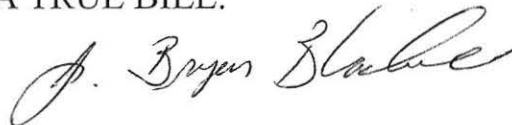
B. Upon conviction of any of the offenses alleged in Counts 1 - 4 of this Indictment, defendant **NNAMDI FRANKLIN OJIMBA** shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended

to be used, in any manner or part, to commit or to facilitate the commission of such offense, including but not limited to a money judgment representing the proceeds obtained as a result of the offenses.

C. Pursuant to Title 21, United States Code, Section 853(p), as adopted by Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property that cannot be subdivided without difficulty.

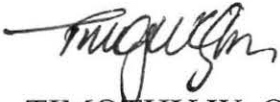
All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(2)(B), Title 18, United States Code, Section 1028(b)(5), and Title 28, United States Code, Section 2461.

A TRUE BILL:

A handwritten signature in cursive script, appearing to read "J. Bryan Blake".

FOREPERSON OF THE GRAND JURY

MARK A. YANCEY
United States Attorney

A handwritten signature in cursive script, appearing to read "Timothy W. Ogilvie".

TIMOTHY W. OGILVIE
Assistant U.S. Attorney