

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

MISTY SARFO-ADU

Crim. No.

18 U.S.C. § 1349

18 U.S.C. § 1029(b)(2)

INFORMATION

The defendant, having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Conspiracy to Commit Bank Fraud)

People and Entities

1. At all times relevant to this Information:
 - a. Defendant MISTY SARFO-ADU was a resident of Deptford, New Jersey.
 - b. Eugene O. Koranteng, who was a co-conspirator but not named as a defendant herein and charged elsewhere, was a resident of Maple Shade, New Jersey.
 - c. Emmanuel S. Yirenkyi, who was a co-conspirator but not named as a defendant herein and charged elsewhere, was a resident of Maple Shade, New Jersey.
 - d. Credit Card Company 1 issued branded credit cards that cardholders could use to purchase goods and services. Cardholders could also use their accounts to write checks to obtain cash advances and transfer balances from other credit cards.
 - e. Bank 1 and Credit Union 1 were financial institutions whose accounts were insured by, respectively, the Federal Deposit Insurance Act and National Credit Union Share Insurance Fund, Title 18, United States Code, Section 20.

The Bank Fraud Conspiracy

2. From in or around May 2018 through in or around July 2019, in Camden County, in the District of New Jersey and elsewhere, defendant

MISTY SARFO-ADU

did knowingly and intentionally conspire and agree with Eugene O. Koranteng, Emmanuel S. Yirenkyi, and others, known and unknown, to execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

The Object of the Conspiracy

3. It was the object of the conspiracy to obtain money from financial institutions by acquiring blank checks containing the names and account information of unsuspecting customers of Credit Card Company 1, making the checks payable to members of the conspiracy, forging the customers' signatures on the checks, and negotiating the checks at financial institutions.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant MISTY SARFO-ADU, Emmanuel S. Yirenkyi, and others caused blank cash advance and balance transfer checks, which listed Credit Card Company 1's customers as the checks' payors, to be sent to residential addresses in New Jersey and elsewhere without the knowledge or authorization of the listed payors.

5. It was further part of the conspiracy that defendant MISTY SARFO-ADU, Emmanuel S. Yirenkyi, and others caused these cash advance and balance transfer checks to be made payable to Eugene O. Koranteng and others who agreed to serve as the payees of the checks, which were purportedly signed by the payors of the checks even though the listed payors

had no knowledge of and never authorized the checks.

6. It was further part of the conspiracy that Eugene O. Koranteng and other payees negotiated at least 17 fraudulent checks totaling approximately \$129,420 at financial institutions in New Jersey and elsewhere, including Bank 1 and Credit Union 1, with the payee keeping a portion of the proceeds and sending the remainder of the proceeds to defendant MISTY SARFO-ADU, Emmanuel S. Yirenkyi, and other members of the conspiracy.

In violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Conspiracy to Commit Access Device Fraud)

1. Paragraph 1 of Count One of this Information is realleged as if set forth in full herein.

The Access Device Fraud Conspiracy

2. From in or about April 2017 through in or about September 2018, in the District of New Jersey, and elsewhere, defendant

MISTY SARFO-ADU

did knowingly conspire and agree with Emmanuel S. Yirenkyi and others to traffic in and use, with the intent to defraud, unauthorized access devices to obtain things of value aggregating \$1,000 or more during a one-year period, in a manner affecting interstate and foreign commerce, contrary to 18 U.S.C. § 1029(a)(2).

The Object of the Conspiracy

3. It was the object of the conspiracy to use credit card accounts belonging to unsuspecting customers of Credit Card Company 1 to obtain goods and services without those customers' knowledge or authorization.

Overt Acts in Furtherance of the Conspiracy

4. On or about September 16, 2018, defendant MISTY SARFO-ADU caused the purchase of an airline ticket for \$3,349 for SARFO-ADU to travel to London, England, on September 18, 2018, using an account belonging to a customer of Credit Card Company 1 that SARFO-ADU had obtained with the intent to defraud and without that customer's knowledge or authorization.

5. On or about September 25, 2018, Emmanuel S. Yirenkyi sent messages to defendant MISTY SARFO-ADU with the account information for several customers of Credit

Card Company 1, which Emmanuel S. Yirenkyi had obtained with the intent to defraud and without those customers' knowledge or authorization, in response to SARFO-ADU's request for credit card information to enable SARFO-ADU to purchase a return flight from London, England.

In violation of Title 18, United States Code, Section 1029(b)(2).

FORFEITURE ALLEGATION AS TO COUNT ONE

1. As a result of committing the bank fraud conspiracy offense, in violation of 18 U.S.C. § 1349, the defendant,

MISTY SARFO-ADU,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offense charged in Count One of this Information.

FORFEITURE ALLEGATION AS TO COUNT TWO

2. As a result of committing the access device fraud conspiracy offense, in violation of 18 U.S.C. § 1029, the defendant,

MISTY SARFO-ADU,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, and pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property that was used or intended to be used to commit or to facilitate the commission of the offense charged in Count Two of this Information.

Substitute Assets Provision
(Applicable to all Forfeiture Counts)

3. If any of the above-described forfeitable property, 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 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A handwritten signature in black ink, reading "Philip R. Sellinger" with a stylized flourish at the end.

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: _____

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INFORMATION FOR

**18 U.S.C. § 1349
18 U.S.C. § 1029(b)(2)**

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