65.

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

:	Hon. Renée Marie Bumb
:	
:	Crim. No. 25-
:	
:	18 U.S.C. § 1960(a)
:	18 U.S.C. § 1960(b)(1)(A)
:	18 U.S.C. § 2
	::

### INFORMATION

The defendant having waived in open court prosecution by Indictment and any objection based on venue, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Defendant ESTHER AMPPIAW was a resident of Florida.

b. ESTHER AMPPIAW did not have the appropriate money

transmitting license in the state of her residence, Florida.

c. Victim-1 was a resident of Camden County, New Jersey, and was over the age of 75.

d. Victim-2 was a resident of New Jersey and was over the age of

2. Between in or around January 2022 and in or around June 2023, ESTHER AMPPIAW received checks, money orders, and electronic payments totaling approximately \$317,290 from individuals she did not know. Among those individuals were Victim-1 and Victim-2, who had been tricked into sending such funds by one or more individuals falsely pretending over the internet to be romantically interested in them.

3. ESTHER AMPPIAW deposited the funds into bank accounts she controlled and/or cashed the checks or money orders.

4. ESTHER AMPPIAW transmitted the bulk of the funds, less a portion that she kept, to other individuals, including recipients overseas.

5. From in or around January 2022 through in or around June 2023, in the District of New Jersey, the Southern District of Florida, and elsewhere, the defendant,

#### ESTHER AMPPIAW,

knowingly conducted, controlled, managed, supervised, directed, and owned all and part of an unlicensed money transmitting business, which affected interstate and foreign commerce and was operated without the appropriate money transmitting license in a State, namely the State of Florida, where such operation is punishable as a misdemeanor or a felony under Florida law.

In violation of Title 18, United States Code, Sections 1960(a), 1960(b)(1)(A), and 2.

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#### **FORFEITURE ALLEGATION**

1. Upon conviction of the offense in violation of 18 U.S.C. § 1960 alleged in this Information, defendant ESTHER AMPPIAW shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the offense, and all property traceable to such property, including but not limited to a money judgment in the amount of \$317,290, representing the property involved in the offense, and all property traceable to such property.

#### Substitute Assets Provision

2. If any of the property described above, 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 party;
- (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 divided 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 the defendant up to the value of the forfeitable property described above.

United States Attorney

CASE NUMBER: 25-

United States District Court District of New Jersey

## UNITED STATES OF AMERICA

v.

ESTHER AMPPIAW

# **INFORMATION FOR**

18 U.S.C. § 1960(a) 18 U.S.C. § 1960(b)(1)(A) 18 U.S.C. § 2

ALINA HABBA UNITED STATES ATTORNEY FOR THE DISTRICT OF NEW JERSEY

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