

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Renée Marie Bumb
	:	
v.	:	Crim. No. 25-
	:	
FELIX CLARK,	:	18 U.S.C. § 1349
a/k/a “Joseph Moore,”	:	18 U.S.C. § 1343
a/k/a “Stanley Smith”	:	

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:

COUNT 1 – CONSPIRACY TO COMMIT WIRE FRAUD
(18 U.S.C. § 1349)

1. At all times relevant to this Information:
 - a. Victim-1 was a resident of Camden County, New Jersey, and was over the age of 75.
 - b. Defendant FELIX CLARK was a resident of Florida, a native of Ghana, and a naturalized United States citizen. “Joseph Moore” was a fake persona and an alias of FELIX CLARK. “Stanley Smith” was a fake persona and an alias of FELIX CLARK.
 - c. Co-Conspirator 1 (“CC-1”) was a resident of Ghana.
 - d. Individual-1 was a resident of Florida and was directed by FELIX CLARK.

THE CONSPIRACY

2. From in or around June 2022 through in or around September 2022, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

**FELIX CLARK,
a/k/a “Joseph Moore,”
a/k/a “Stanley Smith,”**

did knowingly and intentionally conspire and agree with CC-1 and others, to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was for defendant FELIX CLARK and his co-conspirators to financially enrich themselves by establishing phony online romantic relationships with mostly older and lonely victims, conning those victims into sending monies to FELIX CLARK and his co-conspirators through false and fraudulent pretenses, and distributing proceeds from the romance fraud scheme to defendant FELIX CLARK and his co-conspirators in Ghana and elsewhere.

MEANS AND MANNER OF THE CONSPIRACY

4. It was part of the means and manner of the conspiracy that CC-1 and/or other co-conspirators sent electronic messages to Victim-1 and other victims (collectively, the “Victims”), tricking them into sending funds, including but not limited to mailing checks and money orders to locations including but not limited to defendant FELIX CLARK’s residence in Delray Beach, Florida (“CLARK’s Residence”).

5. It was further part of the means and manner of the conspiracy that CC-1 and/or other co-conspirators falsely represented themselves on dating websites aimed at the elderly as being romantically interested in the Victims. Once a Victim became engaged in communication with a co-conspirator, the co-conspirator made multiple false statements to induce the Victim to part with his or her funds, typically including that the purported paramour had a large amount of gold waiting to be claimed, as long as the Victim paid taxes, storage fees, and other purported—but in fact fake—expenses; or that the purported paramour was in trouble and needed money.

6. It was further part of the means and manner of the conspiracy that FELIX CLARK and CC-1 corresponded electronically, and CC-1 periodically asked FELIX CLARK for a name and address where CC-1 and/or other co-conspirators could direct a Victim to send proceeds of the fraudulent scheme.

7. It was further part of the means and manner of the conspiracy that FELIX CLARK told CC-1 to have the Victims send funds made out to and/or

addressed to: (a) Individual-1; (b) FELIX CLARK's alias "Joseph Moore"; and (c) FELIX CLARK's alias "Stanley Smith."

8. It was further part of the means and manner of the conspiracy that FELIX CLARK (either directly or through others whom he directed): received funds from the Victims; kept some of the funds for himself; and forwarded some of the funds on to CC-1 in Ghana and others.

9. It was further part of the means and manner of the conspiracy that FELIX CLARK electronically sent CC-1 photographs of checks, money orders, and notes that he or Individual-1 received in the mail from Victim-1. FELIX CLARK knew that the funds he was receiving were being mailed from New Jersey by Victim-1, who believed that he was sending funds to, or for the benefit of, a romantic interest. FELIX CLARK also knew that CC-1 was personally making such misrepresentations to Victim-1 or causing others to do so. By sending these messages, FELIX CLARK served and perpetuated the conspiracy by allowing CC-1 and/or other co-conspirators to communicate with and trick the Victims more convincingly.

FURTHERING THE CONSPIRACY

10. In furtherance of the conspiracy, CC-1 and/or other co-conspirators overseas exchanged electronic messages with Victim-1 in New Jersey, expressing romantic interest in Victim-1 and asking Victim-1 to send funds under false pretenses.

11. For instance, in mid-June 2022, CC-1 or another co-conspirator used electronic messages from overseas to New Jersey to fraudulently induce Victim-1 to send \$2,000 in money orders to CLARK's Residence. On June 16, 2022, FELIX

CLARK electronically sent CC-1 a photograph of two \$1,000 money orders from Victim-1 and a photograph of a post-it note bearing the handwritten message: “I Love U / Miss You Sweetheart [Victim-1] xoxo.” Within minutes, CC-1 or another co-conspirator electronically messaged Victim-1 to say the money orders had arrived.

12. Additionally, in furtherance of the conspiracy, FELIX CLARK exchanged electronic messages with CC-1, Individual-1, and others regarding the funds FELIX CLARK would directly or indirectly receive.

13. For instance, on August 4, 2022, CC-1 sent FELIX CLARK an electronic message that Victim-1 was about to send \$10,000 and asked FELIX CLARK whether CC-1 and/or other co-conspirators should direct Victim-1 to address the funds to Individual-1 or to “Joseph Moore.” FELIX CLARK responded, “Joseph Moore.”

14. During the course of the conspiracy, FELIX CLARK and Individual-1 each deposited checks and/or money orders addressed to “Joseph Moore” into a bank account in the name of “Joseph Moore.”

15. In total, between in or around June 2022 and in or around September 2022, Victim-1 mailed approximately 23 checks totaling more than \$275,000 to CLARK’s Residence from New Jersey. Of these, approximately six checks were made out to Individual-1 between June 17 and July 22, 2022—just over one month—totaling \$24,500. The other approximately 17 checks, totaling more than \$250,000 between July 15 and September 7, 2022—less than two months—were made out to “Joseph Moore.” All of the checks made out to “Joseph Moore” were deposited into bank accounts held in the name of “Joseph Moore.”

16. On several occasions, FELIX CLARK was outside the United States at a time when Victim-1 mailed funds to his residence in Florida. In furtherance of the conspiracy, FELIX CLARK exchanged electronic messages with Individual-1 to: provide the tracking numbers FELIX CLARK had received from CC-1 for the expected packages to Individual-1; confirm a package had been received; relay photographs of the checks or money orders and any messages from Victim-1; and confirm the funds had been deposited into an account FELIX CLARK, Individual-1, or a co-conspirator controlled.

17. For example, on or about July 16, 2022, while he was overseas, FELIX CLARK electronically sent Individual-1 the tracking number for a package containing a check from Victim-1 addressed to “Joseph Moore.” Two days later, on July 18, 2022, a check from Victim-1 for \$69,381 made out to “Joseph Moore” was deposited into a bank account held in the name of “Joseph Moore.”

Contrary to Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1349.

COUNT 2 – WIRE FRAUD
(18 U.S.C. §§ 1343 and 2)

1. Paragraphs 1 and 3 through 17 of Count 1 of this Information are realleged and incorporated by reference as if set forth in full herein.
2. On or about July 16, 2022, in the District of New Jersey, the Southern District of Florida, and elsewhere, the defendant,

FELIX CLARK,
a/k/a “Joseph Moore,”
a/k/a “Stanley Smith,”

knowingly devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and aided and abetted the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent presents, representations, and promises, and for the purpose of executing and attempting to execute such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of wire, radio, and television communications in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, that is, FELIX CLARK sent an electronic message to Individual-1 containing the tracking number for a package from Victim-1 containing a fraudulently obtained check for more than \$69,000.

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATIONS

Count 1

1. Upon conviction of the offense in violation of 18 U.S.C. § 1349 charged in Count 1 of this Information, defendant FELIX CLARK shall forfeit to the United States all property, real and personal—

- a. used or intended to be used to commit, to facilitate, or to promote the commission of such offense, pursuant to 18 U.S.C. § 982(a)(8)(A), including, but not limited to, any equipment, software, or other technology used or intended to be used to commit or to facilitate the commission of such offense, pursuant to 18 U.S.C. § 2328(a)(2); and
- b. constituting, derived from, or traceable to the gross proceeds the defendant obtained directly or indirectly as a result of the offense; and all property traceable to such property, pursuant to 18 U.S.C. §§ 982(a)(8)(B) and 2328(a)(1).

Count 2

2. Upon conviction of the offense in violation of 18 U.S.C. § 1343 charged in Count 2 of this Information, defendant FELIX CLARK shall forfeit to the United States all property, real and personal—

- a. used or intended to be used to commit, to facilitate, or to promote the commission of such offense, pursuant to 18 U.S.C. § 982(a)(8)(A), including, but not limited to, any equipment, software, or other technology used or intended to be used to

commit or to facilitate the commission of such offense, pursuant to 18 U.S.C. § 2328(a)(2); and

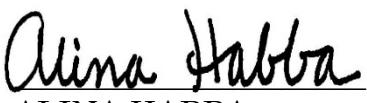
- b. constituting, derived from, or traceable to the gross proceeds the defendant obtained directly or indirectly as a result of the offense; and all property traceable to such property, pursuant to 18 U.S.C. §§ 982(a)(8)(B) and 2328(a)(1).

**SUBSTITUTE ASSETS PROVISION
(APPLICABLE TO ALL FORFEITURE ALLEGATIONS)**

4. 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) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.


ALINA HABBA
United States Attorney

CASE NUMBER: 25-_____

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UNITED STATES OF AMERICA

v.

**FELIX CLARK,
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INFORMATION FOR

**18 U.S.C. § 1349
18 U.S.C. § 1343**

**ALINA HABBA
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FOR THE DISTRICT OF NEW JERSEY**

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