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2022R00692/BL/SN

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AT 8:00 12:44 pm. M QA
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA	:	Hon. Esther Salas
	:	
v.	:	Crim. No. 24-827
	:	
MANASEH MAWUFEMOR MINTAH	:	18 U.S.C. § 1956(h)
	:	18 U.S.C. § 1956(a)(1)(B)(i)
	:	18 U.S.C. § 1957
	:	18 U.S.C. § 1960(a)
	:	18 U.S.C. § 2

SECOND SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE

(Money Laundering Conspiracy)

1. At various times relevant to this Second Superseding Indictment:
 - a. Defendant MANASEH MAWUFEMOR MINTAH ("MINTAH")
was a resident of Massachusetts.
 - b. Dazionking LLC ("Dazionking") was a Massachusetts business
entity formed, owned, and controlled by MINTAH.
 - c. All wire transfers were processed through the Federal Wire
Transfer Network ("Fedwire") and were processed in a way that caused an electronic
communication to travel through a Federal Reserve facility in New Jersey.

The Conspiracy

2. Between at least as early as in or around 2020 and in or around August 2022, in the District of New Jersey and elsewhere, the defendant,

MANASEH MAWUFEMOR MINTAH,

did knowingly and intentionally conspire and agree with others:

a. to conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity (to wit, wire fraud, contrary to Title 18, United States Code, Section 1343), knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i); and

b. to engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, withdrawal, transfer, and exchange of United States currency and funds, such property having been derived from a specified unlawful activity (to wit, wire fraud, contrary to Title 18, United States Code, Section 1343), contrary to Title 18, United States Code, Section 1957.

Goal of the Conspiracy

3. The goal of the conspiracy was for MINTAH and his coconspirators to enrich themselves by laundering and transmitting funds obtained through fraud from U.S.-based victims to those coconspirators in their overseas jurisdictions, concealing the illegal nature of those funds, and for MINTAH to retain portions of those funds as compensation for his unlawful money-laundering services.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. MINTAH's coconspirators (the "Fraud Coconspirators") were generally based in West Africa and perpetrated Internet-enabled fraud against U.S. victims. For example, and among other Internet-enabled fraud, the Fraud Coconspirators perpetrated "romance scams," in which the perpetrators created fake online personas that they used to form bogus online romantic relationships with U.S.-based victims. The perpetrators would then, through these online personas and under the ruse of these fake romantic relationships, persuade their victims to send them money under a variety of false pretenses. The Internet-enabled fraud committed by the Fraud Coconspirators constituted, among other crimes, wire fraud, contrary to Title 18, United States Code, Section 1343.

b. The Fraud Coconspirators perpetrating these romance scams and other Internet-enabled frauds, being based in Western Africa and other jurisdictions outside the United States, needed to employ money-laundering techniques to move the proceeds of their fraud—which U.S.-based victims paid to U.S. bank accounts—

to overseas accounts under their control. Otherwise, U.S. banks would likely detect and stop large transfers of U.S. victim funds to overseas financial institutions.

c. MINTAH conspired with the Fraud Coconspirators to provide them with these money-laundering services, allowing the Fraud Coconspirators to move funds that they fraudulently obtained from U.S. victims to their own control in their own jurisdictions and evading detection by U.S. banks and law enforcement. To do so, MINTAH allowed the Fraud Coconspirators to use bank accounts both in his own name, and also under the name of Dazionking, a shell business entity that he formed for this unlawful purpose.

d. Specifically, in or around August 2020, MINTAH formed Dazionking, a business entity that was entirely under his ownership and control. At times, and in responses to questions received from financial institutions, MINTAH knowingly made false representations about Dazionking's business and operations. But in fact, and as MINTAH well knew, Dazionking was a shell entity that provided no legitimate business services and existed to facilitate MINTAH's and the Fraud Coconspirators' money-laundering activities. MINTAH then opened multiple bank accounts with numerous banks for Dazionking, with himself as signatory.

e. MINTAH would then provide the Fraud Coconspirators with the account information for both the Dazionking accounts, which he controlled, and his own personal accounts. In turn, the Fraud Coconspirators would then direct their U.S. victims—as part of their romance scams and other Internet-enabled frauds—to

send the money requested under fraudulent pretenses to these accounts through various means, including wire transfers.

f. MINTAH would then move these victim proceeds from the Dazionking accounts and his own personal accounts to the Fraud Coconspirators through wire transfers, cash withdrawals, and other means. In so doing, and in order to evade detection by the banks, MINTAH would knowingly provide false information on the wire-transfer requests he initiated that misrepresented the true nature of the requested wire transfers. Many of the wire transfers MINTAH initiated were processed by Fedwire.

g. As compensation for his unlawful money-laundering services for his Fraud Coconspirators, MINTAH retained portions of the illicit funds that he caused to pass through his Dazionking and personal accounts. MINTAH then converted those funds to his personal use. Throughout the conspiracy, MINTAH well knew that he was transacting in the proceeds of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT TWO
(Money Laundering)

1. The allegations contained in paragraphs 1, 3, and 4 of Count One of this Second Superseding Indictment are realleged here.

2. On or about the date set forth in the table below, in the District of New Jersey and elsewhere, the defendant,

MANASEH MAWUFEMOR MINTAH,

did knowingly conduct and attempt to conduct the financial transaction set forth below affecting interstate commerce, which involved the proceeds of specified unlawful activity (to wit, wire fraud, contrary to Title 18, United States Code, Section 1343), knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity and that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, as set forth more fully below:

Count	Approximate Date	Description of Monetary Transaction
Two	2/18/20	\$65,000 wire transfer

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Section 2.

COUNTS THREE AND FOUR

(Money Laundering)

1. The allegations contained in paragraphs 1, 3, and 4 of Count One of this Second Superseding Indictment are realleged here.

2. On or about the dates set forth in the table below, in the District of New Jersey and elsewhere, the defendant,

MANASEH MAWUFEMOR MINTAH,

did knowingly engage and attempt to engage in the monetary transactions set forth below by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity (to wit, wire fraud, contrary to Title 18, United States Code, Section 1343), each such transaction constituting a separate count of this Second Superseding Indictment:

Count	Approximate Date	Description of Monetary Transaction
Three	2/18/20	\$65,000 wire transfer from a personal bank account to another bank account, processed by Fedwire
Four	7/26/21	Initiation of a \$108,000 wire transfer from a Dazionking bank account to another bank account, processed by Fedwire

In violation of Title 18, United States Code, Section 1957 and Section 2.

COUNT FIVE

(Operating an Unlicensed Money Transmitting Business)

1. The allegations contained in paragraphs 1, 3, and 4 of Count One of this Second Superseding Indictment are realleged here.

2. From in or around 2020 through in or around August 2022, in the District of New Jersey and elsewhere, the defendant,

MANASEH MAWUFEMOR MINTAH,

did knowingly conduct, control, manage, supervise, direct, and own all and part of an unlicensed money transmitting business, that is, a money transmitting business that affected interstate and foreign commerce, and that failed to comply with the money transmitting business registration requirements under Title 31, United States Code, Section 5330, and regulations prescribed under such section.

In violation of Title 18, United State Code, Sections 1960(a) and (b)(1)(B).

FORFEITURE ALLEGATION

1. Upon conviction of the money laundering offenses charged in Counts One through Four of this Second Superseding Indictment, the defendant,

MANASEH MAWUFEMOR MINTAH,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such money laundering offenses of conviction, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

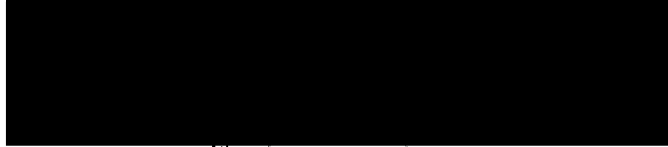
2. If any of the property described above, as a result of any act or omission of the defendant:

- 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 Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title

28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described above.

A TRUE BILL



Foreperson

ROBERT FRAZER
United States Attorney

Benjamin *Sean*

Benjamin Levin
Sean Nadel
Assistant U.S. Attorneys

Approved by:

A handwritten signature in black ink, appearing to be 'ELK'.

Elaine K. Lou
Chief, Criminal Division

CASE NUMBER: 24-CR-827

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

MANASEH MAWFEMOR MINTAH

SECOND SUPERSEDING INDICTMENT FOR

**18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1957
18 U.S.C. § 1960(a)
18 U.S.C. § 2**

A True Bill

Foreperson

**ROBERT FRAZER
UNITED STATES ATTORNEY**

**BENJAMIN LEVIN
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NEWARK, NEW JERSEY
(973) 645-2700**
