
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : HON. JAMES B. CLARK, III
 : :
 : Mag. No. 20-12418 (JBC)
 : :
JEFFERSON ROBERT : **CRIMINAL COMPLAINT**
a/k/a “Johnny Eto” : :

I, Darryl Williams, Jr., being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Darryl Williams, Jr., Postal Inspector
U.S. Postal Inspection Service

Sworn to before me and subscribed in my presence,

October 20, 2020

at New Jersey

HONORABLE JAMES B. CLARK, III
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

From in or about August 2019 through in or about September 2020, in Essex County, in the District of New Jersey and elsewhere, defendant JEFFERSON ROBERT, a/k/a “Johny Eto,” knowingly and intentionally conspired with others to devise and intend to devise a scheme and artifice to defraud companies and individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute 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, including a wire transfer from a location outside of New Jersey to a location inside of New Jersey, contrary to Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1349.

ATTACHMENT B

I, Darryl Williams, Jr., am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I am familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and in part unless otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act “CARES Act” was signed into law. The CARES Act created a new temporary federal program unemployment insurance program called Pandemic Unemployment Assistance (“PUA”). PUA provides unemployment insurance benefits (“UIBs”) for individuals who are not eligible for other types of unemployment (e.g., self-employed, independent contractors, gig economy workers). The CARES Act also created a new temporary federal program called Federal Pandemic Unemployment Assistance (“FPUC”) that provides an additional \$600 weekly benefit to those eligible for PUA and regular UIBs.

2. The Washington State Employment Security Department (“ESD”) administers and manages the regular unemployment and PUA programs in the State of Washington. Subject to certain eligibility requirements, a person who is unemployed, but who used to be employed by an employer in the State of Washington, can apply to receive UIBs from the State of Washington.

3. On or about August 6, 2019, defendant JEFFERSON ROBERT, a/k/a “Johny Eto,” (“ROBERT”) opened a bank account at Bank 1 in the name of “Johny Eto” (“Bank Account 1”). Defendant ROBERT used a United Kingdom of Great Britain and Northern Ireland passport (the “Passport”) to open the account. Law enforcement has determined that the Passport is fraudulent.

4. On or about May 8, 2020, an application was made to ESD for unemployment benefits in the name of an individual (“Victim 1”) using Victim 1’s personal identification information.

5. On or about May 12, 2020, pursuant to instructions by the individual purporting to be Victim 1, the State of Washington sent a wire transfer into Bank Account 1 in the approximate amount of \$7,930. This wire transfer was sent from a location outside of New Jersey to a location in New Jersey. Victim 1 has stated, in substance and in part, that Victim 1: (a) did not

seek unemployment benefits from the State of Washington; (b) did not direct the wire transfer discussed in this paragraph; and (c) does not know defendant ROBERT.

6. Bank Account 1 has received additional funds from fraudulent activity. For instance:

Business Enterprise Compromise¹

a. On or about April 6, 2020, approximately \$23,000 was transferred into Bank Account 1 from an entity (“Victim 2”). On or about April 22, 2020, approximately \$28,000, was transferred into Bank Account 1 from Victim 2. A representative of Victim 2 has stated, in substance and in part, that: (1) Victim 2 did not authorize the transfers discussed in this paragraph; and (2) these transfers were sent as a result of Victim 2’s being subject to a business enterprise compromise.

IRS Payments

b. On or April 22, 2020, an Internal Revenue Service payment in the amount of approximately \$11,977 was sent by wire transfer into Bank Account 1. The transfer indicated that the payment was to a certain individual (“Victim 3”). A relative of Victim 3 has stated, in substance and in part, that Victim 3 did not seek this payment and does not know defendant ROBERT. On or about March 11, 2020, March 12, 2020, and April 29, 2020, similar wire transfers totaling approximately \$20,000 were made from the Internal Revenue Service into Bank Account 1 in the names of three additional individuals, none of whom was defendant ROBERT. Based upon my training and experience, and the investigation to date, I believe that these transfers resulted from fraudulent activity.

7. Between on or about March 11, 2020 and May 1, 2020, a debit card associated with Bank Account 1 was used to purchase approximately 57 United States Postal Service Money Orders. The total value of the money orders was approximately \$52,000. The “from” information on most of the money orders listed the name “Jefferson Robert” and an address in Newark New

¹ Business email compromise (“BEC”) scams generally target businesses that regularly perform wire transfer payments. In the typical BEC scam, fraudsters compromise legitimate business email accounts through social engineering (such as email “spoofing”) or computer intrusion (such as a phishing email with a malicious link) to trick companies into conducting unauthorized transfers of funds.

Jersey (the “Address”). Records from New Jersey Motor Vehicle Commission reflect that defendant ROBERT provided the Address as his address when obtaining a driver’s license.

8. Law enforcement has obtained photographs of an individual making ATM withdrawals from Bank Account 1 in Northern New Jersey. Based upon a comparison of those pictures to the picture on defendant ROBERT’s driver’s license and a social media account in his name, I believe the individual making the withdrawals is defendant ROBERT.

9. Defendant ROBERT also used the Passport to open bank accounts at three other banks (“Bank Account 2,” “Bank Account 3,” and “Bank Account 4”). Bank Accounts 2 through 4 were opened on or about August 6, 2019, the same day as Bank Account 1. Bank Accounts 2 through 4 were frozen or closed by their respective banks due to suspicion of fraud on or before November 8, 2019. Based upon my training and experience, and the investigation to date, including the length of time Bank Accounts 2 through 4 were open and a review of the accounts’ activity, I believe Bank Accounts 2 through 4 received funds obtained through fraudulent activity.

10. For example, on or about September 19, 2019, a check payable to “Johny Eto” in the amount of approximately \$27,400 was deposited into Bank Account 4. The check was drawn on an account in the name of an individual (“Victim 4”). Victim 4 has stated, in substance and in part, that Victim 4 did not open the account and does not know either Johny Eto or defendant ROBERT.

11. In addition, on or about January 9, 2018, a bank account (“Bank Account 5”) was opened. Between on or about January 9, 2018, and on or about March 2, 2018, when the account was closed, approximately \$68,500 was deposited into Account 5. Five of the deposits, totaling approximately \$19,000, were from a bank account associated with an individual (“Victim 5”). Victim 5 has stated, in substance and in part, this transfer was the result of Victim 5 being a victim of a romance scam.² On or about January 20, 2018, a debit card associated with Bank Account 5 was used to make a purchase at a jewelry store in New Jersey. Records obtained concerning that purchase include a receipt listing the buyer as defendant ROBERT.

² A romance scam is a confidence trick involving feigning romantic intentions towards a victim, gaining their affection, and then using that goodwill to commit fraud.

12. Based upon the investigation, defendant ROBERT and his conspirators attempted to cause losses of more than \$600,000 and actually caused losses of more than \$500,000.