



**ATTACHMENT A**

**Counts One and Two**  
**(Transacting in Criminal Proceeds)**

From in or around January 2020 through in or around February 2020, in the District of New Jersey and elsewhere, the defendant,

ESEOSA OBASEKI,

did knowingly engage and attempt to engage in monetary transactions by, through, or 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, namely, wire fraud in violation of Title 18, United States Code, Section 1343, each transaction constituting a separate count of this Complaint:

Count	Date	Description
1	January 15, 2020	OBASEKI withdrew approximately \$12,370 from the bank account ending in 3912, constituting a portion of Victim-1's January 9, 2020 \$100,000 wire transfer into that account.
2	February 7, 2020	OBASEKI withdrew approximately \$24,394 from the account ending in 3912, constituting a portion of Victim-1's February 6, 2020 \$210,000 wire transfer into that account.

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

## ATTACHMENT B

I, Anthony Bellitti, am a Special Agent with the Federal Bureau of Investigation ("FBI"). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including video surveillance, business records, bank records, and other documents. 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 the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where 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. At various times relevant to this complaint:

a. Defendant ESEOSA OBASEKI was a resident of Linden, New Jersey.

b. MKO Deliveries, Inc. ("MKO"), was a New Jersey-based corporation formed in or around January 2018 with a principal address at OBASEKI's residence in Linden, New Jersey. The certificate of incorporation for MKO was signed by OBASEKI and listed OBASEKI as the registered agent, incorporator, and 100 percent owner of MKO.

c. Victim-1 was a resident of Washington State.

d. Individual-1 was a fictitious online persona created to defraud Victim-1 and others on online dating and social media applications.

e. Bank-1 was a financial institution as defined in Title 18, United States Code, Section 1956(c)(7).

2. In or around January 2020, the FBI commenced an investigation of an elaborate scheme, commonly referred to as a romance-scheme, aimed at duping victims on dating and social media applications into transferring large sums of United States currency into various bank accounts under false or fraudulent pretenses.

3. In or around March or April 2019, Victim-1 was contacted by Individual-1 while playing an internet-based word-game. The pair continued the conversation on a separate internet-based communications platform ("Application-A"). Individual-1 and Victim-1 communicated for months on

Application-A before Individual-1 began asking Victim-1 for money in or around July 2019. During this time, Individual-1, under false pretenses, convinced Victim-1 of his romantic interest in Victim-1, and in doing so, gained Victim-1's trust.

4. In or around June 2019, Individual-1 utilized Application-A to ask Victim-1 for money. Shortly thereafter, Individual-1 falsely stated to Victim-1 that the money was for business expenses and shipping expenses for a package containing a "box of valuables" that he said he intended to ship to Victim-1. To further the deception, Individual-1 sent Victim-1 emails and messages containing false invoices from a fake shipping company for various fictitious customs fees related to the package.

5. Beginning in or around January 2020, Individual-1 asked Victim-1 to transfer a large sum of U.S. currency to a bank account at Bank-1 ending in 3912 (the "3912 Account") for the release of the "box of valuables" that Individual-1 had falsely promised to send to Victim-1 after the money was wired.

6. Records from Bank-1 records indicate that the 3912 Account was a business account in the name of MKO and that ESEOSA OBASEKI was the sole signatory. Additionally, records for the 3912 Account list OBASEKI as the president of MKO and OBASEKI'S personal address in Linden, New Jersey as the address for MKO.

7. In or around January 2020, Individual-1 asked Victim-1 to transfer \$100,000 into the 3912 Account, which only contained \$0.41 at the time. Individual-1 falsely represented to Victim-1 that this payment was for expenses associated with the "box of valuables." For example, in a conversation on Application-A on or about January 9, 2020, Individual-1, after repeatedly professing his love to Victim-1, falsely represented to Victim-1 that the package was being held in Dubai and that it would not be released until Victim-1 wired \$100,000 to the 3912 Account. On or about January 9, 2020, based on the fraudulent pretenses, representations, and promises of Individual-1, Victim-1 arranged to have \$100,000 wire-transferred from her bank account to the 3912 Account.

8. Over the next several weeks, OBASEKI systematically drained the 3912 Account through a series of withdrawals, cashier's checks, and other transactions.

a. For instance, on or about January 15, 2020, OBASEKI withdrew approximately \$12,370 from the 3912 Account at a branch in Elizabeth, New Jersey, in the form of cash, cashier's checks, and bank fees.

b. Within approximately one week, OBASEKI nearly depleted the funds from the 3912 Account, which as of January 17, 2020, only had a balance of \$317.41.

9. In the following weeks, Individual-1 continued soliciting additional funds from Victim-1 for expenses associated with the "box of valuables." For example, on or about January 29, 2020, Individual-1 sent Victim-1 a message over a chat application in which he falsely represented that a shipping company informed him that the "box of valuables" was being held in Wenatchee, Washington by customs and would not be released until Victim-1 wired approximately \$450,000 to the shipping company. On or about February 6, 2020, based on the fraudulent pretenses, representations, and promises of Individual-1, Victim-1 arranged to have \$210,000 wire-transferred from her bank account to the 3912 Account.

10. Again, OBASEKI systematically drained the funds from the 3912 Account through a series of withdrawals, cashier's checks, and other transactions.

a. For instance, on or about February 7, 2020, OBASEKI withdrew approximately \$24,394 from the 3912 Account at a branch in Newark, New Jersey, in the form of cash, cashier's checks, and bank fees.

b. As of February 19, 2020, the 3912 Account had a balance of \$4,466.87.

11. Victim-1 never received a package from Individual-1, including any package containing the "box of valuables."

12. On or about February 21, 2020, an investigator employed by Bank-1 contacted OBASEKI to discuss the wire transfers that occurred in January and February 2020. In a recorded call, OBASEKI falsely stated that the recent \$210,000 wire transfer had come from someone with whom he had just started working in his car part business. OBASEKI further misrepresented that he received wire transfers from individuals purchasing cars and car parts. When asked by the bank representative who sent the wire for \$210,000, OBASEKI stated that he spoke to the individual the day before but would have to check his records before providing the name. Following the call, OBASEKI failed to provide to the bank representative the name of the individual who had provided him with the \$210,000, or, for that matter, the names of anyone who had transferred money into the 3912 Account.