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WILLIAM T. WALSH  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Michael A. Shipp
	:	
v.	:	Crim. No. 21-735 (MAS)
	:	
TORITSEJU GABRIEL OTUBU,	:	18 U.S.C. § 1028A 18
a/k/a "Andy Richards,"	:	U.S.C. § 1343 18
a/k/a "Ann Petersen"	:	U.S.C. § 1349 18
	:	U.S.C. § 1956
	:	

**INDICTMENT**

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

**COUNT ONE**

(Wire Fraud Conspiracy – 18 U.S.C. § 1349)

1. At times relevant to this Indictment:

a. Defendant TORITSEJU GABRIEL OTUBU, a/k/a "Andy Richards," a/k/a "Ann Petersen," was a resident of South Africa and a citizen of Nigeria. OTUBU controlled the entity Otubu Properties Pty Ltd. ("Otubu Properties").

b. Co-conspirator-1 was a citizen of Nigeria and a resident of South Africa. Co-conspirator-1 was a founding member of the Cape Town, South Africa Zone of the Neo Black Movement of Africa. The Neo Black Movement of Africa, which is also known as the "Black Axe," was an organization that originated and is headquartered in Benin City, Nigeria. Black Axe operated in various countries, including South Africa, and was

organized into regional chapters known as “zones.” Co-conspirator-1 controlled a business entity that was used, among other things, to receive proceeds of Romance Scams.

c. “Romance Scams” involved perpetrators creating fictitious profiles using aliases on online dating or social websites, gaining the trust of potential victims by convincing the victims that they are in a romantic relationship with the perpetrator, and then directing such victims to transfer or receive money that the perpetrator later tried to collect, all under false pretenses.

d. “Business-Email Compromise” was a type of internet-related fraud often targeting businesses, entities, or individuals working with businesses on transactions involving wire transfer payments. The fraud was carried out by compromising and/or “spoofing” legitimate email accounts through social engineering or computer intrusion techniques to cause employees of the target company (or other individuals involved in legitimate business transactions) to conduct unauthorized transfers of funds, most often to accounts controlled by the scammers.

e. All wire transfers processed through the Fedwire Funds Service (“Fedwire”) were processed in a way that caused an electronic communication to travel through a Federal Reserve facility in New Jersey.

f. “University-1” was a university located in Connecticut.

g. “Business-1” was a company located in Pennsylvania.

h. “Victim-1” and “Victim-2” were both victims of Romance Scams who resided in the United States.

### **The Conspiracy**

2. From at least in or about October 2016 through in or about September 2021, in the District of New Jersey, and elsewhere, the defendant,

**TORITSEJU GABRIEL OTUBU,**  
a/k/a “Andy Richards,”  
a/k/a “Ann Petersen,”

did knowingly and intentionally conspire and agree with Co-conspirator-1 and others to devise a scheme and artifice to defraud, and to obtain money and property from victims by means of false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, to 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.

### **The Goal of the Conspiracy**

3. It was the goal of the conspiracy for OTUBU, Co-conspirator-1, and others (the “Co-conspirators”) to enrich themselves and others by tricking individuals they targeted via the internet through materially false and fraudulent pretenses, representations, promises, and omissions to obtain

money and other items of value.

**Manner and Means of the Conspiracy**

4. It was part of the conspiracy that:

a. The Co-conspirators used aliases to misrepresent the true identities of the individuals communicating with victims in furtherance of the fraud scheme, including the following:

i. OTUBU used the aliases “Andy Richards” and “Ann Petersen,” purportedly from Aberdeen, Scotland, in furtherance of the fraud scheme.

ii. The Co-conspirators used the aliases “Dioli Guarneri,” “Frederick Alonzo,” “Richard Luregn,” “Chris Frank,” “Kenneth Voitus Giorgio,” and others, in furtherance of the fraud scheme.

b. The Co-conspirators often used aliases not only of the purported love interest of a victim, but also of other people involved in the purported love interest’s life, including a business partner or a friend, to bolster the perceived legitimacy of the stories portrayed as a part of the Romance Scam and to further induce the victims to send money on behalf of the purported love interest.

c. The Co-conspirators perpetrated Business Email Compromises to obtain money. For example:

i. Business-1 was a victim of a Business Email

Compromise perpetrated by the Co-conspirators, which caused Business-1 to unwittingly send more than approximately \$2 million into financial accounts from in or about July 2020 to in or about August 2020.

ii. University-1 was a victim of a Business Email

Compromise perpetrated by the Co-conspirators, which caused University-1 to unwittingly send more than approximately \$4,644,000 in payments from in or about August 2020 through in or about November 2020.

d. The Co-conspirators utilized the financial accounts of other victims and individuals to conceal and disguise the illegally obtained funds.

e. The Co-conspirators communicated with Romance Scam victims and convinced victims to send money and items of value for the Co-conspirators' benefit, including money obtained by Business Email Compromises.

f. The Co-conspirators convinced Romance Scam victims to open accounts at cryptocurrency exchanges to conduct cryptocurrency transactions and to permit the Co-conspirators to conduct cryptocurrency transactions for the Co-conspirators' benefit, including cryptocurrency transactions that derived from Business Email Compromises.

g. OTUBU used Otubu Properties to receive money from Romance Scams. For example, in or about December 2017, a Romance Scam victim who believed that she was in a relationship with "Dioli Guarneri," sent

international wire transfers to an account in the name of Otubu Properties.

All in violation of Title 18, United States Code, Section 1349.

**COUNTS TWO THROUGH FIVE**  
(Wire Fraud – 18 U.S.C. §§ 1343 and 2)

1. Paragraphs 1, 3, and 4 of Count One of the Indictment are re-alleged here.
2. From in or around 2016 through the present, in the District of New Jersey and elsewhere, the defendant,

**TORITSEJU GABRIEL OTUBU,**  
a/k/a “Andy Richards,”  
a/k/a “Ann Petersen,”

and others did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud victims of money and property by means of materially false and fraudulent pretenses, representations, and promises, and on or about the dates listed below, in the District of New Jersey and elsewhere, for the purposes of executing and attempting to execute this scheme and artifice to defraud, did knowingly and intentionally transmit and cause to be transmitted by means of wire, radio and television communications in interstate commerce, certain writings, signs, signals, pictures and sounds, as listed below:

<b>COUNT</b>	<b>APPROXIMATE DATE</b>	<b>WIRE</b>
2	December 18, 2017	Causing the transfer of approximately \$32,000 by an interstate wire that traveled through New Jersey via Fedwire.
3	July 30, 2020	Causing the transfer of approximately \$150,000 by an interstate wire that traveled through New Jersey via Fedwire.

4	November 17, 2020	Causing the transfer of approximately \$245,000 by an interstate wire that traveled through New Jersey via Fedwire.
5	November 27, 2020	Causing the transfer of approximately \$150,000 by an interstate wire that traveled through New Jersey via Fedwire.

In violation of Title 18, United States Code, Section 1343 and Section 2.



**COUNT SIX**

(Money Laundering Conspiracy – 18 U.S.C. § 1956(h))

1. Paragraphs 1, 3, and 4 of Count One, and Counts Two through Five of this Indictment, are re-alleged here.

**The Conspiracy**

2. From in or about October 2016 through in or about September 2021, in the District of New Jersey, and elsewhere, the defendant,

**TORITSEJU GABRIEL OTUBU,**  
a/k/a “Andy Richards,”  
a/k/a “Ann Petersen,”

did knowingly and intentionally conspire and agree with Co-conspirator-1 and others to conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of 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 knew 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).

**The Goal of the Conspiracy**

3. It was the goal of the conspiracy for OTUBU, Co-conspirator-1, and others to obtain money obtained by wire fraud that traveled through the United States in a manner that concealed the illegal nature of the funds.

**Manner and Means**

4. It was part of the conspiracy that:

a. The Co-conspirators used individuals, including Romance Scam victims, to open and access U.S.-based bank accounts and cryptocurrency accounts so the Co-conspirators could launder illegally obtained money.

b. OTUBU provided U.S. bank account information to other Co-conspirators to conceal money deposited into these bank accounts from other individuals, including the Romance Scam victims.

c. OTUBU and Co-conspirator-1 used false invoices addressed to Romance Scam victims to conceal the illegal nature of funds sent by the victims. OTUBU and Co-conspirator-1 used the false invoices to, among other things, provide to banks as the purported proof of why the Romance Scam victims transferred money to the accounts that OTUBU and Co-conspirator-1 controlled, as opposed to admitting that the funds were transferred as a part of a fraudulent Romance Scam.

d. OTUBU received money that was the result of Business

Email Compromises and Romance Scams, including through an account held in the name of Otubu Properties.

e. OTUBU and other Co-conspirators utilized cryptocurrency accounts to facilitate the transfer of illegally obtained money from the United States.

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

**COUNTS SEVEN THROUGH NINE**

(Aggravated Identity Theft – 18 U.S.C. §§ 1028A and 2)

1. Paragraphs 1, 3, and 4 of Count One of this Indictment are re-alleged here.
2. On or about the following dates, in the District of New Jersey and elsewhere, the defendant,

**TORITSEJU GABRIEL OTUBU,**  
a/k/a “Andy Richards,”  
a/k/a “Ann Petersen,”

did knowingly and intentionally transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, wire fraud conspiracy, contrary to 18 U.S.C. § 1349, set forth in Count One of this Indictment, knowing that the means of identification belonged to another actual person:

<b>COUNT</b>	<b>APPROXIMATE DATE(S)</b>	<b>MEANS OF IDENTIFICATION</b>
7	November 12, 2018	OTUBU possessed and transferred an invoice bearing the name of Victim-1 to facilitate the receipt of funds sent from Victim-1’s bank account.
8	September 30, 2019	OTUBU possessed and caused to be transferred the username and password of Victim-2’s cryptocurrency exchange account.
9	February 2020- May 2020	OTUBU possessed and caused to be transferred the bank debit card with an account number belonging to Victim-2.

In violation of Title 18, United States Code, Section 1028A and Section 2.

**FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH FIVE**

1. As a result of committing the wire fraud conspiracy offense charged in Count One and wire fraud offenses charged in Counts Two through Five of this Indictment, the defendant, **TORITSEJU GABRIEL OTUBU**, shall forfeit to the United States, pursuant to Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, constituting or derived from proceeds traceable to the wire fraud conspiracy offense alleged in Count One and wire fraud offenses alleged in Counts Two through Five of this Indictment.

**FORFEITURE ALLEGATION AS TO COUNT SIX**

2. As a result of committing the money laundering conspiracy offense charged in Count Six of this Indictment, the defendant, **TORITSEJU GABRIEL OTUBU**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such money laundering conspiracy offense, and all property traceable to such property.

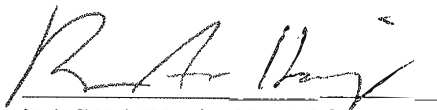
**SUBSTITUTE ASSETS PROVISION**  
**(Applicable to All Forfeiture Allegations)**

3. 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 in Forfeiture Allegation paragraphs 1 and 2.

A True Bill,



RACHAEL A. HONIG  
Acting United States Attorney

**CASE NUMBER: 21-735 (MAS)**

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

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**UNITED STATES OF AMERICA**

**v.**

**TORITSEJU GABRIEL OTUBU,  
a/k/a "Andy Richards,"  
a/k/a "Ann Petersen"**

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**INDICTMENT FOR**

**18 U.S.C. § 1028A**

**18 U.S.C. § 1343**

**18 U.S.C. § 1349**

**18 U.S.C. § 1956**

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**A True Bill,**

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**Foreperson** 

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RACHAEL A. HONIG  
ACTING UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

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