

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 21-
 :
 v. : 18 U.S.C. §§ 1349, 1956(h) and
 : 26 U.S.C. § 7201
 RUBBIN SARPONG :

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

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

The Defendant and His Co-Conspirators

1. At all times relevant to this Information:
 - a. Defendant RUBBIN SARPONG was a citizen of Ghana and a legal permanent resident of the United States, and resided in Cumberland County, New Jersey.
 - b. Defendant RUBBIN SARPONG alleged to have owned and operated an entity named RUBBIN SARPONG AUTOSALES within the State of New Jersey, which is a fictitious entity that is not registered in the State of New Jersey, or otherwise known to exist.
 - c. Defendant RUBBIN SARPONG maintained, used and/or controlled the following thirteen bank accounts at seven different banks, which he used in furtherance of the scheme described herein:

BANK	NAME OF ACCOUNT HOLDER	LAST FOUR DIGITS OF BANK ACCOUNT NUMBER
Bank 1	RUBBIN SARPONG	-2889
Bank 1	RUBBIN SARPONG AUTO SALES	-1851
Bank 2	RUBBIN SARPONG	-0564

BANK	NAME OF ACCOUNT HOLDER	LAST FOUR DIGITS OF BANK ACCOUNT NUMBER
Bank 2	RUBBIN SARPONG	-0556
Bank 2	FRIEND 1	-1760
Bank 2	FRIEND 2	-1446
Bank 2	FRIEND 2	-1408
Bank 3	RUBBIN SARPONG	-2547
Bank 3	RUBBIN SARPONG	-6523
Bank 4	RUBBIN SARPONG	-5749
Bank 5	RUBBIN SARPONG	-7517
Bank 6	RUBBIN SARPONG	-3063
Bank 7	RELATIVE 1	-7764

- d. Defendant RUBBIN SARPONG also maintained, controlled, used and directed the use of at least eight money transfer service accounts at three separate money transfer service businesses, to receive monies from victims and also to send proceeds to himself, via family members, and his conspirators in Ghana and elsewhere, including:

MONEY TRANSFER SERVICE BUSINESS	NAME OF ACCOUNT HOLDER
Money Transfer Service Business 1	SARPONG
Money Transfer Service Business 1	FRIEND 2
Money Transfer Service Business 1	FRIEND 1
Money Transfer Service Business 2	SARPONG
Money Transfer Service Business 2	FRIEND 2
Money Transfer Service Business 2	FRIEND 1
Money Transfer Service Business 3	SARPONG
Money Transfer Service Business 3	FRIEND 2

- e. Defendant RUBBIN SARPONG used various forms of wire communications to perpetrate the scheme, including his cellular telephone and an email account (hereinafter “SARPONG EMAIL 1”), from which he corresponded with banks, co-conspirators and at least one victim of the offense (identified herein as “Victim 9”).
- f. Co-Conspirator 1 (hereinafter “CC1”) is an unindicted co-conspirator who resided in Ghana.

- i. CC1 maintained, controlled, used and directed the use of various forms of wire communications to perpetrate the scheme, including two cellular telephones and at least two email accounts which were used to correspond with conspirators, including a hotmail account (hereafter, “CC1 EMAIL 1”) and a gmail account (hereafter, “CC1 EMAIL 2”). CCI also maintained, controlled, used and directed the use of at least ten additional email accounts which were used to correspond directly with victims of the offense.
- ii. CC1 maintained and controlled two bank accounts at a bank in Ghana ending in the last four digits -1220 and -1230, which CC1 used to receive monies obtained from the fraudulent scheme, sent to CC1 from defendant RUBBIN SARPONG or from one of SARPONG’s nominees. Defendant RUBBIN SARPONG also sent monies from the fraudulent scheme to CC1 via Money Transfer Service Businesses.
- g. Co-Conspirator 2 (hereinafter “CC2”) is an unindicted co-conspirator who resided in Ghana. CC2 maintained and controlled two bank accounts at a bank in Ghana ending in the last four digits -3230 and -3220, which CC2 used to receive monies obtained from the fraudulent scheme sent to CC2 from defendant RUBBIN SARPONG or from one of SARPONG’s nominees. Defendant RUBBIN SARPONG also sent monies from the fraudulent scheme to CC2 via Money Transfer Service Businesses.

THE CONSPIRACY

2. From at least as early as January 2016 through on or about September 3, 2019, in Cumberland County, in the District of New Jersey, and elsewhere, the defendant

RUBBIN SARPONG,

did knowingly and intentionally conspire and agree with CC1, CC2 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 SARPONG and his co-conspirators to financially enrich themselves by establishing phony online romantic relationships with mostly older and lonely victims, con those victims into sending monies to SARPONG and his co-conspirators through false and fraudulent pretenses, launder those proceeds through various bank accounts and money transfer service accounts in New Jersey and elsewhere with the intent to conceal the monies, evade detection of law enforcement, evade paying taxes on such monies, continue the operation of the wire fraud scheme, and distribute proceeds from the scheme to defendant RUBBIN SARPONG and his co-conspirators in Ghana and elsewhere.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that the co-conspirators initially established contact with victims through various online dating websites, including but not limited to Plenty of Fish (“pof.com”), Ourtime.com, and Match.com. The co-conspirators often posed as United States military personnel who were stationed overseas, and used fictitious or stolen identities of United States military personnel in their online dating profiles.

5. It was part of the conspiracy that the co-conspirators contacted victims through the dating websites and then pretended to strike up a romantic relationship with them.

6. It was part of the conspiracy that the co-conspirators created numerous email accounts and Voice over Internet Protocol (hereafter “VoIP”) phone numbers, which they used to

communicate with victims, initially to further the illusion of the romantic relationship, and later, to ask for money from the victims, and to provide the victims with instructions on how to wire the money, including recipient names, addresses, financial institutions, and account numbers.

7. It was part of the conspiracy that, after establishing virtual romantic relationships with victims on the online dating platforms and via email and VoIP, the co-conspirators asked for money from victims, often for the purported purpose of paying to ship gold bars to the United States. Although the stories the co-conspirators told the victims varied, most often the co-conspirators claimed to be members of the United States military stationed in Syria who received, recovered, or were awarded gold bars. The co-conspirators told many victims that their money would be returned once the gold bars were received in the United States. In most cases, the co-conspirators introduced additional fictitious persons with whom the victims were directed to correspond to make arrangements for the payment of monies and the shipment of the gold bars to the United States.

8. It was part of the conspiracy that defendant RUBBIN SARPONG was one of several co-conspirators in the United States who received victim funds directly from victims. As such, defendant RUBBIN SARPONG insulated CC1, CC2 and other co-conspirators living in Ghana from direct financial transactions with victims.

9. It was part of the conspiracy that defendant RUBBIN SARPONG received victim monies by various means, including:

- a. Wire transfers to bank accounts held by defendant RUBBIN SARPONG, including in the name of a non-existent entity, RUBBIN SARPONG AUTOSALES;
- b. Wire transfers to bank accounts held in the names of friends and relatives of defendant RUBBIN SARPONG;
- c. Money orders, personal checks and/or cashier's checks mailed to the defendant

RUBBIN SARPONG, his friends and relatives; and

- d. Money transfers to the defendant RUBBIN SARPONG and his friends and relatives via various money transfer services.

10. It was part of the conspiracy that defendant RUBBIN SARPONG used numerous bank accounts, including nominee accounts in the names of his friends and families as well as a fictitious business entity, RUBBIN SARPONG AUTOSALES, to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the scheme, and also to evade paying income tax on the proceeds of the scheme.

11. It was part of the conspiracy that defendant RUBBIN SARPONG, CC1, CC2 and their co-conspirators defrauded approximately 40 victims out of approximately \$1,765,358.56

12. It was part of the conspiracy that defendant RUBBIN SARPONG and his co-conspirators used the monies sent by the victims for their own purposes and not for the purposes claimed by the co-conspirators – that is, to transport non-existent gold bars to the United States for the alleged use of the victims and their phony romantic interests. Rather, the co-conspirators used the monies to continue the fraudulent scheme, and also to enrich themselves.

13. It was part of the conspiracy that defendant RUBBIN SARPONG and his co-conspirators converted the victims' monies to their own use by several means, including by making and causing to be made cash withdrawals from bank accounts maintained and controlled by defendant RUBBIN SARPONG, by wiring and causing to be wired the fraudulently obtained monies to other domestic and foreign bank accounts, including to bank accounts controlled by defendant RUBBIN SARPONG'S family members, CC1, CC2 and other co-conspirators, and by wiring and causing to be wired the fraudulently obtained monies through money transfer service businesses held in the name of defendant RUBBIN SARPONG, and the names of his friends and relatives to accounts controlled by defendant RUBBIN SARPONG'S friends and relatives, CC1, CC2 and other co-conspirators.

FURTHERING THE CONSPIRACY

14. In furtherance of the conspiracy and to affect its object, its members committed and caused to be committed the following acts, among others, in the District of New Jersey and elsewhere.

15. On or about the following dates, defendant RUBBIN SARPONG and his co-conspirators caused the following victims to make wire transfers into the following bank accounts held by defendant RUBBIN SARPONG and/or his friends and relatives:

VICTIM	DATE OF WIRE	AMOUNT OF WIRE	RECIPIENT/ACCOUNT HOLDER	RECIPIENT'S BANK	ACCOUNT NUMBER LAST 4 DIGITS
Victim 1	12/6/17	\$10,000	SARPONG	Bank 1	-2889
Victim 1	12/13/17	\$20,000	SARPONG	Bank 1	-2889
Victim 1	12/19/17	\$17,400	SARPONG	Bank 1	-2889
Victim 1	1/3/18	\$48,000	SARPONG	Bank 1	-2889
Victim 1	1/10/18	\$39,850	SARPONG	Bank 1	-2889
Victim 2	5/22/18	\$2,860	RUBBIN SARPONG AUTOSALES	Bank 1	-1851
Victim 2	5/30/18	\$5,600	RUBBIN SARPONG AUTOSALES	Bank 1	-1851
Victim 2	6/1/18	\$28,400	RUBBIN SARPONG AUTOSALES	Bank 1	-1851
Victim 2	6/11/18	\$15,150	RUBBIN SARPONG AUTOSALES	Bank 1	-1851
Victim 2	6/12/18	\$22,800	RUBBIN SARPONG AUTOSALES	Bank 1	-1851
Victim 3	5/28/16	\$5,600	SARPONG	Bank 2	-0564
Victim 3	6/4/16	\$50,000	SARPONG	Bank 2	-0564
Victim 3	6/9/16	\$36,500	SARPONG	Bank 2	-0564
Victim 3	6/9/16	\$2,015	SARPONG	Bank 2	-0564
Victim 3	6/20/16	\$950	SARPONG	Bank 2	-0564
Victim 3	6/21/16	\$3,500	SARPONG	Bank 2	-0564
Victim 3	6/23/16	\$35,000	SARPONG	Bank 2	-0564
Victim 4	8/22/18	\$2,860	SARPONG	Bank 3	-2547
Victim 5	5/7/18	\$18,300	SARPONG	Bank 1	-2889
Victim 5	5/8/18	\$14,890	SARPONG	Bank 1	-2889
Victim 5	5/15/18	\$18,900	SARPONG	Bank 1	-2889
Victim 5	5/31/18	\$25,500	SARPONG	Bank 1	-2889
Victim 5	6/5/18	\$17,800	SARPONG	Bank 1	-2889
Victim 6	11/15/17	\$7,000	SARPONG	Bank 1	-2889

VICTIM	DATE OF WIRE	AMOUNT OF WIRE	RECIPIENT/ ACCOUNT HOLDER	RECIPIENT'S BANK	ACCOUNT NUMBER LAST 4 DIGITS
Victim 6	11/17/17	\$7,980	SARPONG	Bank 1	-2889
Victim 6	11/20/17	\$2,000	SARPONG	Bank 1	-2889
Victim 6	11/29/17	\$36,000	SARPONG	Bank 1	-2889
Victim 6	11/29/17	\$12,000	SARPONG	Bank 1	-2889
Victim 7	10/31/16	\$680	SARPONG	Bank 4	-5749
Victim 8	11/18/16	\$2,800	SARPONG	Bank 5	-7517
Victim 8	11/23/16	\$7,800	SARPONG	Bank 5	-7517
Victim 8	11/28/16	\$5,460	SARPONG	Bank 5	-7517
Victim 8	12/02/16	\$13,500	SARPONG	Bank 5	-7517
Victim 8	12/03/16	\$7,900	SARPONG	Bank 5	-7517
Victim 8	12/09/16	\$46,800	SARPONG	Bank 5	-7517
Victim 8	12/27/16	\$10,000	SARPONG	Bank 4	-5749
Victim 8	01/09/17	\$1,500	SARPONG	Bank 4	-5749
Victim 8	01/23/17	\$2,000	SARPONG	Bank 4	-5749
Victim 10	10/27/16	\$7,074	SARPONG	Bank 4	-5749
Victim 10	11/2/16	\$9,604	SARPONG	Bank 4	-5749
Victim 10	11/4/16	\$3,500	FRIEND 1	Bank 2	-1760
Victim 11	8/8/17	\$2,500	SARPONG	Bank 1	-2889
Victim 12	5/22/17	\$5,600	SARPONG	Bank 1	-2889
Victim 13	8/23/17	\$500	SARPONG	Bank 1	-2889
Victim 13	8/29/17	\$12,000	SARPONG	Bank 1	-2889
Victim 13	9/1/17	\$48,000	SARPONG	Bank 1	-2889
Victim 13	9/27/17	\$20,200	SARPONG	Bank 1	-2889
Victim 14	4/11/18	\$6,860	SARPONG	Bank 1	-2889
Victim 14	4/18/18	\$2,800	SARPONG	Bank 1	-2889
Victim 14	4/23/18	\$3,920	SARPONG	Bank 1	-2889
Victim 14	4/30/18	\$5,400	SARPONG	Bank 1	-2889
Victim 14	5/7/18	\$7,350	SARPONG	Bank 1	-2889
Victim 14	10/17/18	\$2,206.54	RELATIVE 1	Bank 1	-7764
Victim 15	4/9/18	\$21,441.72	SARPONG	Bank 1	--1851
Victim 19	6/19/17	\$9,200	FRIEND 2	Bank 2	-1446
Victim 19	6/20/17	\$11,200	SARPONG	Bank 6	-3063
Victim 20	10/26/16	\$600	SARPONG	Bank 4	-5749
Victim 20	10/31/16	\$850	SARPONG	Bank 4	-5749
Victim 20	12/22/16	\$1,200	SARPONG	Bank 4	-5749
Victim 21	5/15/17	\$4,980	SARPONG	Bank 1	-2889
Victim 21	5/16/17	\$5,600	SARPONG	Bank 1	-2889
Victim 21	5/26/17	\$9,650	FRIEND 2	Bank 2	-1446
Victim 22	5/31/17	\$200	SARPONG	Bank 1	-2889
Victim 23	7/5/17	\$5,600	SARPONG	Bank 1	-2889
Victim 25	9/27/18	\$453.59	RELATIVE 1	Bank 7	-7764

VICTIM	DATE OF WIRE	AMOUNT OF WIRE	RECIPIENT/ ACCOUNT HOLDER	RECIPIENT'S BANK	ACCOUNT NUMBER LAST 4 DIGITS
Victim 25	11/15/18	\$439.82	RELATIVE 1	Bank 7	-7764
Victim 26	10/26/18	\$2,800	RELATIVE 1	Bank 7	-7764
Victim 27	11/16/18	\$3,990	RELATIVE 1	Bank 7	-7764
Victim 28	12/3/18	\$3,980	RELATIVE 1	Bank 7	-7764
Victim 29	1/16/19	\$502.32	RELATIVE 1	Bank 7	-7764
Victim 30	3/8/19	\$1,500	RELATIVE 1	Bank 7	-7764
Victim 30	3/29/19	\$1,000	RELATIVE 1	Bank 7	-7764
Victim 30	4/2/19	\$600	RELATIVE 1	Bank 7	-7764
Victim 38	5/31/19	\$7,000	FRIEND 2	Bank 2	-1408
Victim 39	6/5/19	\$700	FRIEND 2	Bank 2	-1408
Victim 40	4/10/17	\$5,600	SARPONG	Bank 3	-2547

16. On or about the following dates, defendant RUBBIN SARPONG wired and caused to be wired proceeds from the fraudulent scheme out of the country to CC1, CC2 and one of SARPONG'S relatives:

DATE OF WIRE	AMOUNT OF WIRE	SENDER	SENDER'S BANK	RECIPIENT	RECIPIENT'S BANK	TIMING RE: RECEIPT OF VICTIMS' WIRES
10/2/17	\$10,000	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired 5 days after receipt of \$20,200 from Victim 13
10/4/17	\$5,800	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired 7 days after receipt of \$20,200 from Victim 13
11/20/17	\$7,500	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired after receipt of three wires from Victim 6 on 11/15/17, 11/17/17 and 11/20/17 totaling \$16,980
11/30/17	\$20,000	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired 1 day after receiving two wires

DATE OF WIRE	AMOUNT OF WIRE	SENDER	SENDER'S BANK	RECIPIENT	RECIPIENT'S BANK	TIMING RE: RECEIPT OF VICTIMS' WIRES
						totaling \$48,000 from Victim 6
12/4/17	\$17,000	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired 5 days after receiving two wires totaling \$48,000 from Victim 6
12/13/17	\$7,800	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired within 7 days of receipt of two wires totaling \$30,000 from Victim 1
12/15/17	\$15,700	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired within 9 days of receipt of two wires totaling \$30,000 from Victim 1
12/20/17	\$13,700	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired 1 day after receipt of \$17,400 wire from Victim 1
1/5/18	\$17,500	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired 2 days after receipt of \$48,000 wire from Victim 1
1/8/18	\$20,000	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired 5 days after receipt of \$48,000 wire from Victim 1
1/11/18	\$20,000	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired 1 day after receipt of \$39,850 wire from Victim 1
1/16/18	\$10,900	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired within 13 days of receipt of two wires totaling \$87,850 from Victim 1
4/11/18	\$5,300	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired within 2 days of receipt of \$21,441.72 wire from

DATE OF WIRE	AMOUNT OF WIRE	SENDER	SENDER'S BANK	RECIPIENT	RECIPIENT'S BANK	TIMING RE: RECEIPT OF VICTIMS' WIRES
						Victim 15, and on the same day as receipt of \$6,860 wire received from Victim 14
5/1/18	\$4,140	SARPONG	Bank 1 -2889	CC1	Ghanaian Bank -1220	Wired within 19 days of receipt of four wires totaling \$18,980 from Victim 14
5/9/18	\$16,000	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired within 2 days of receipt of three wires totaling \$40,540 from Victims 5 and 14
5/9/18	\$16,000	RUBBIN SARPONG AUTOSALES	Bank 1 -1851	CC1	Ghanaian Bank -1220	Wired within 2 days of receipt of three wires totaling \$40,540 from Victims 5 and 14
5/16/18	\$17,000	SARPONG	Bank 1 -2889	CC2	Ghanaian Bank -3230	Wired within 8 days of receipt of two wires totaling \$33,790 from Victim 5
5/16/18	\$6,900	RUBBIN SARPONG AUTOSALES	Bank 1 -1851	CC1	Ghanaian Bank -1220	Wired within 8 days of receipt of two wires totaling \$33,790 from Victim 5
5/29/18	\$17,500	RUBBIN SARPONG AUTOSALES	Bank 1 -1851	CC2	Ghanaian Bank -3220	Wired within 14 days of receipt of two wires totaling \$21,760 from Victims 2 and 5
5/29/18	\$3,700	RUBBIN SARPONG AUTOSALES	Bank 1 -1851	CC1	Ghanaian Bank -1220	Wired within 14 days of receipt of two wires

DATE OF WIRE	AMOUNT OF WIRE	SENDER	SENDER'S BANK	RECIPIENT	RECIPIENT'S BANK	TIMING RE: RECEIPT OF VICTIMS' WIRES
						totaling \$21,760 from Victims 2 and 5
6/1/18	\$17,500	RUBBIN SARPONG AUTOSALES	Bank 1 -1851	CC1	Ghanaian Bank -1220	Wired within 2 days of receipt of three wires totaling \$59,500 from Victims 2 and 5
6/1/18	\$17,500	RUBBIN SARPONG AUTOSALES	Bank 1 -1851	CC2	Ghanaian Bank -3220	Wired within 2 days of receipt of three wires totaling \$59,500 from Victims 2 and 5
6/13/18	\$18,000	RUBBIN SARPONG AUTOSALES	Bank 1 -1851	CC1	Ghanaian Bank -1220	Wired within 2 days of receipt of two wires totaling \$37,950 from Victim 2
7/9/18	\$23,100	RUBBIN SARPONG AUTOSALES	Bank 1 -1851	CC1	Ghanaian Bank -1220	
8/13/18	\$17,900	SARPONG	Bank 3 -2547	CC1	Ghanaian Bank -1220	
9/6/18	\$4,280	SARPONG	Bank 3 -2547	CC1	Ghanaian Bank -1220	Wired within 15 days of receipt of two wires totaling \$5,720 from Victim 4
7/15/19	\$10,000	FRIEND 2	Bank 2 -0567	RELATIVE 2	Nigerian Bank -5061	
9/3/19	\$35,018	FRIEND 2	Bank 2 -1408	CC1	Ghanaian Bank -1230	

17. On or about January 31, 2016, defendant RUBBIN SARPONG sent a series of email messages from his SARPONG EMAIL 1 account to Victim 9 in furtherance of the scheme and specifically intended to fraudulently obtain monies from Victim 9:

- a. In response to an email from Victim 9, stating that Victim 9 had sent \$2,999

to defendant RUBBIN SARPONG via PayPal which Victim 9 intended to be used to purchase airplane tickets for a fictitious military service member to fly home, defendant RUBBIN SARPONG responded via email, stating, “Am trying my best for him to get home to u. But the money u sent to me on my PayPal account is still pending so u have to get hold [sic] at PayPal for them to release the money to me. Thanks.”

- b. When defendant RUBBIN SARPONG was unable to retrieve Victim 9’s funds through his PayPal account, defendant RUBBIN SARPONG asked VICTIM 9 to send the money via Western Union. VICTIM 9 responded she did not have the time or the extra money to send a payment via Western Union and asked defendant RUBBIN SARPONG, “Can you just get him into a safe country for now and we shall see if he can get out from there.” Defendant RUBBIN SARPONG again responded to Victim 9 via email, “Okay can u put it in my bank account. That’s free. Or transfer it into my bank account.”

Thereafter, defendant RUBBIN SARPONG sent Victim 9 his bank account information for a bank account in his name at Bank 2, ending in the last four digits -9153.

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

COUNT 2 – CONSPIRACY TO COMMIT MONEY LAUNDERING
(18 U.S.C. § 1956(h))

18. Paragraphs 1 and 3 through 17 of this Information are realleged as if set forth in full herein.

19. From at least as early as January 2016 through on or about September 3, 2019, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

RUBBIN SARPONG,

knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, namely, the wire fraud scheme described in Count 1, and (A) with the intent to promote the carrying on of a specified unlawful activity, and (B) with the intent to engage in conduct constituting a violation of section 7201 or 7206 of the Internal Revenue Code of 1986, namely, tax evasion in violation of 26 U.S.C. § 7201, and (C) knowing that the transaction was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, did knowingly and intentionally conspire and agree with CC1, CC2 and others to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, specifically, the receipt, transfer, and other disposition of funds that were the proceeds of the wire fraud scheme charged in Count 1, contrary to Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(A)(ii) and 1956(a)(1)(B)(i).

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

COUNT 3 – TAX EVASION
(26 U.S.C. § 7201)

20. From at least as early as 2015 and continuing through 2019, defendant RUBBIN SARPONG, was a resident of Cumberland County, New Jersey, and was engaged in the fraudulent scheme described in Count 1 above, from his home and elsewhere in New Jersey.

21. At times relevant to this Information, defendant RUBBIN SARPONG:
- a. Knew that he was responsible for filing income tax returns, and, indeed, had previously filed income tax returns for tax years 2011 and 2012;
 - b. Failed to file income tax returns for tax years 2016 through 2018, despite having earned substantial taxable income in each of those years from the scheme described in Count 1; and
 - c. Earned approximately \$1,144,850 in taxable income during tax years 2016 through 2018 from the fraudulent scheme described in Count 1, upon which he failed to pay any of the tax due and owing, which totaled \$387,923, as indicated in the below table:

TAX YEAR	TAXABLE INCOME EARNED FROM COUNT 1 SCHEME	TAX DUE AND OWING
2016	\$325,404	\$108,536
2017	\$395,686	\$135,361
2018	\$423,760	\$144,026
TOTAL TAX LOSS FOR TAX YEARS 2016-2018		\$387,923

22. On or about April 17, 2019, defendant SARPONG failed to file a 2018 tax return on behalf of himself, and failed to seek an extension to file such a return. His taxable income for the calendar year 2018 was \$423,760 and the amount of tax due and owing was \$144,026.

23. From in or about January 2018 through on or about April 17, 2019, in the District of New Jersey, and elsewhere, defendant

RUBBIN SARPONG

knowing that he had received taxable income upon which there was income tax due and owing to the United States of America, and failing to make an income tax return on or before April 17, 2019, as required by law, to any proper officer of the Internal Revenue Service, and to pay income tax to the Internal Revenue Service, the defendant RUBBIN SARPONG did willfully attempt to evade and defeat substantial income tax due and owing by him to the United States of America for the calendar year 2018 by concealing his possession, control and use of the taxable income, by:

- a. Maintaining, using and controlling bank accounts at multiple different banks, including an account in his name at Bank 1 having the last four digits -2889, an account in the name of fictitious entity RUBBIN SARPONG AUTO SALES at Bank 1 having the last four digits -1851, an account in his name at Bank 3 having the last four digits -2547, and an account in the name of one of his relatives, RELATIVE 1, at Bank 7, having the last four digits -7764;
- b. Using accounts at Money Transfer Service Businesses 1 and 3, which operate outside the banking system, to send proceeds from the Count 1 offense to his co-conspirators, including CC1 and CC2 in Ghana;
- c. Withdrawing monies in cash from the various bank accounts and money service transfer accounts that he owned, controlled and used to receive proceeds from victims, and using such cash to pay his personal expenses,

including by purchasing money orders to pay his rent and other personal expenses;

- d. Falsely denying such income and assets when applying for and receiving Medicaid benefits in or about September 2018 and Supplemental Nutrition Assistance Program (“SNAP”) benefits in or about October 2018; and
- e. Transferring monies outside of the United States to Ghana for the alleged purpose of purchasing and maintaining real estate and assets in Ghana.

In violation of Title 26, United States Code, Section 7201.

A handwritten signature in blue ink that reads "Rachael A. Honig" with a stylized flourish at the end.

RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: 21-_____

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

UNITED STATES OF AMERICA

v.

RUBBIN SARPONG

INFORMATION

18 U.S.C. §§ 1349, 1956(h) and 26 U.S.C. § 7201

RACHAEL A. HONIG
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FOR THE DISTRICT OF NEW JERSEY

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