UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

ALEC TAHIR BAKER,

Defendant.

Cr. No. 1:24-cr-00099-JJM-PAS Violations: 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering) 18 U.S.C. §§ 1344(2) and 2 (Bank Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

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

Introduction

At all times relevant to this Indictment:

- Alec Tahir BAKER ("BAKER"), resided in Corona, California, Dallas,
 Texas, and Las Vegas, Nevada.
- 2. United For Energy and Consulting, Inc. ("United for Energy") was a corporation registered with the State of Washington with an address of 100 N Howard St Ste R, Spokane, Washington. BAKER was listed as the Governor of this corporation.
- 3. Baker Global Services, LLC., were corporations located in Texas and Washington with mailing addresses in Washington, Texas, California, and Nevada. Baker was the Managing Member and Governor of these corporations.
 - 4. Al Hujen Group for Oil & Gas Services, Inc. was a corporation located in

Washington with mailing addresses in Washington, California, Texas, and Tennessee.

BAKER was the Governor of this corporation.

- 5. Wall Edge Inc. was a corporation located in Tennessee with mailing addresses in Texas and Tennessee.
 - 6. R.K. was an individual residing in the State of Florida.
 - 7. T.P. was an individual residing in the State of Washington.
 - 8. S.T. was an individual residing in the State of Massachusetts.
- 9. Business Email Compromise ("BEC") schemes are a type of fraud scheme in which fraudsters send an email message that appears to come from a known source making a legitimate request, but in fact the fraudsters provide fraudulent financial account information and request payment go to the fraudulent account. Individuals who conduct BEC and other schemes often work with a vast network of money launderers to help them "clean" funds and then re-integrate the "cleaned" funds into the economy so that the funds can be used free from the taint of criminal activity.
- 10. In his personal name and in the names of corporations he controlled,
 BAKER opened bank accounts at American First Credit Union, Banner Bank, Bank of
 America, California Bank, Citibank, Comerica, Fifth Third Bank, Inwood National Bank,
 J.P. Morgan Chase, Navy Federal Credit Union, PNC Bank, US Bank, Western Alliance
 Bank/Bank of Nevada, and Zions Bancorporation ("Baker's Financial Institutions"). The
 deposits of Baker's Financial Institutions were insured by the Federal Deposit Insurance
 Corporation ("FDIC") or the National Credit Union Administration ("NCUA").
 - 11. In his personal name, BAKER opened an account at Coinbase. Coinbase is

a U.S.-based cryptocurrency exchange.

- 12. The Town of Bristol was a town in the State of Rhode Island that held a bank account at Citizens Bank, the deposits of which were insured by the FDIC.
- 13. Victim Company #1 was a company headquartered in Maryland that provided vehicle repair services. Victim Company #1 held a bank account at CFG Bank, the deposits of which were insured by the FDIC.
- 14. Victim Company #2 was a company headquartered in Hartland, Wisconsin that worked in the design and manufacturing of nitrogen generation systems. Victim Company #2 held a bank account at Huntington National Bank, the deposits of which were insured by the FDIC.
- 15. P.Z. was an individual residing in Batavia, New York who was building a home in Montana using a Montana building company named Blue Ribbon Builders.

 P.Z. held a bank account at Tompkins Community Bank, the deposits of which were insured by the FDIC.
- 16. Victim Company #3 was a company located in Colorado that was an American defense contractor. Victim Company #3 held a bank account at Citibank, the deposits of which were insured by the FDIC.
- 17. Victim Company #4 was a company located in California that was a commercial and residential real estate development firm. Victim Company #4 held a bank account at Umpqua Bank, the deposits of which were insured by the FDIC.
- 18. Victim Company #5 was a manufacturing company located in Owosso,
 Michigan. Victim Company #5 held a bank account at UMB Bank, the deposits of which

were insured by the FDIC.

The Conspiracy

19. Beginning on a date unknown to the Grand Jury but not later than May 2022, and continuing until at least on or about November 5, 2024, in the District of Rhode Island and elsewhere, the defendant,

ALEC TAHIR BAKER,

did knowingly combine, conspire and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of 18 U.S.C. §§ 1956 and 1957, to wit:

- a. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire fraud and bank fraud, in violation of 18 U.S.C. §§ 1343 and 1344, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of 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, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and,
- b. to knowingly engage and attempt to engage in a monetary transaction by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the withdrawal and transfer of U.S. currency, funds, and monetary instruments, such property having been derived from a specified unlawful activity, that is, wire fraud and bank fraud, in violation of 18 U.S.C. §§ 1343 and 1344, in violation of 18 U.S.C. § 1957.

The Objects of the Conspiracy

- 20. It was an object of the conspiracy for defendant BAKER and his coconspirators to unlawfully enrich themselves by obtaining money from individuals and companies who were defrauded through business email compromise and other schemes into transferring monies out of their bank accounts.
- 21. It was a further object of the conspiracy for defendant BAKER to conduct financial transactions and cause others to conduct financial transactions to conceal and disguise the nature, location, source, ownership, and control of the fraud proceeds.

Manner and Means of the Conspiracy

- 22. The manner and means by which the conspirators accomplished the objectives of the conspiracy included, among others, the following:
- 23. It was a part of the conspiracy that a member of the conspiracy would send a phishing email to an individual or corporation with a link that, if opened, would provide the conspirator with access to the victim's computer network. After obtaining access to the victim's computer network, a conspirator would direct the victim's bank to transfer money into a bank account controlled by BAKER or another co-conspirator.
- 24. It was a further part of the conspiracy that a member of the conspiracy would telephone the bank at which a victim company had an account, impersonate an employee of that business, and then cause the bank to transfer funds out of the business's account into an account controlled by BAKER or another conspirator.

- 25. It was a further part of the conspiracy that a member of the conspiracy would send an email to an employee of a victim company posing as a vendor to whom funds were owed by the victim company. The co-conspirator would then provide the victim company employee with new bank account information into which funds should be paid. The victim company employee would then unknowingly send company funds to a bank account controlled by BAKER or another conspirator.
- 26. It was a further part of the conspiracy that BAKER opened more than 40 bank accounts in his name and in the names of companies he created into which fraudulent funds from victims would be transferred.
- 27. It was a further part of the conspiracy that soon after BAKER received fraudulent funds into one of his bank accounts, he withdrew some funds in cash and cashiers' checks, and transferred fraudulent funds to other accounts under his control, including to Coinbase and other crypto accounts, and to other individuals and entities, including R.K., T.P. and S.T.
- 28. It was a further part of the conspiracy that after receiving fraudulent funds from BAKER, R.K., T.P., S.T. and other individuals would withdraw some of the fraudulent funds in cash and cashiers' checks and would transfer the fraudulent funds to other individuals and entities.
- 29. It was further part of the conspiracy that BAKER and others would conduct financial transactions with the fraud proceeds designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control, including, using bank accounts in their names, in the names of entities created and controlled by

them, and in the names of other persons and entities working with them, making withdrawals of fraud proceeds through cash withdrawals, cashiers' checks, and checks to each other and third parties; making deposits of cash, money orders, and checks derived from fraud proceeds; executing and receiving wire transfers.

- 30. It was a further part of the conspiracy that BAKER would provide false information and documents to the financial institutions at which he had bank accounts when those banks asked him to provide an explanation for large sums of money being deposited or wired into his accounts. BAKER falsely represented to the financial institutions that he had a legitimate business relationship with the victim company that wired money into his accounts. BAKER also provided fraudulent invoices and contracts to make it appear that there was a legitimate business purpose for the receipt of the fraudulent funds.
- 31. It was a further part of the conspiracy that the victim individuals and businesses lost at least \$8,854,243 and that approximately \$7,649,876 in fraudulent proceeds were transmitted to bank accounts under BAKER's control.

Acts in Furtherance of the Conspiracy

The following overt acts, among others, were committed in the District of Rhode Island and elsewhere in furtherance of the conspiracy:

Fraud on Town of Bristol

32. On or about January 18, 2023, a member of the conspiracy obtained access to the computer network used by the Town of Bristol, a town in the State of Rhode Island.

- 33. On or about January 19, 2023, a member of the conspiracy caused \$310,500 to be wired out of the Citizens Bank account of the Town of Bristol into a Citibank account of United For Energy, controlled by BAKER.
- 34. On or about January 20, 2023, BAKER withdrew \$75,000 from the Citibank account with the note "Q1 salary." On January 23, 2023, BAKER withdrew \$144,700 from the Citibank account by causing a bank check to be issued to a company named D Light Agency LLC that was deposited into a JP Morgan Chase account.
- 35. On or about January 31, 2023, BAKER withdrew \$89,169.87 in the form of a cashier's check made payable to Al Hujen Group. The cashier's check was then deposited into a US Bank account under the name Al Hujen Group, under BAKER's control. From the US Bank account, from February 1 -10, 2023, BAKER withdrew \$46,000.

- 36. In or about May 2022, a co-conspirator telephoned CFG Bank and pretended to be E.M., who manages the finances of Victim Company #1. The co-conspirator requested that they be sent an activation code to the account. The bank employee, believing they were speaking to E.M., provided the activation code.
- 37. On or about May 13, 2022, a co-conspirator accessed Victim Company #1's bank account and caused \$218,500 in funds to be transferred out of Victim #1 Company's account into the accounts of others. Of this total, \$120,000 was transferred into a Bank of America account of United For Energy, held by BAKER.

- 38. From May 13-18, 2022, BAKER transferred \$117,800 from the Bank of America account to another Bank of America account under BAKER's name. BAKER then sent \$110,700 to Coinbase from May 16, 2022 to May 20, 2022.
- 39. On May 20, 2022, BAKER was captured by a surveillance camera making two ATM withdrawals from the Bank of America account into which the fraudulent funds had been deposited.
- 40. On or about August 31, 2022, when questioned by the Baltimore County Police Department about the \$120,000 transfer to his bank account, BAKER told the police that he was a victim of an online romance scam. The Baltimore County Police sent BAKER a "money mule" letter, advising him that the \$120,000 wire he received was part of a fraud scheme and that knowingly engaging in a financial transaction involving funds from illegal activity may violate federal money laundering laws.

- 41. On or about May 22, 2022, A.W., an accounting supervisor for Victim Company #2, received an email from an individual claiming to be a vendor named Nano Solutions. The sender of the email asked A.W. to change the bank account information into which payments were to be made to Nano Solutions. A.W. changed the bank payment information and only later learned that there was a letter missing from the email address the request came from.
- 42. From on or about June 3, 2022, to July 8, 2022, Victim Company #2 sent 5 payments totaling \$325,496 to the bank account information provided by the co-

conspirator. The \$325,496 was sent to a Bank of America account in the name of United For Energy, with ALEC BAKER as the account signer.

43. Shortly after each of these five payments were received, BAKER made \$317,100 in online transfers to a Bank of America account controlled by BAKER, withdrew some of the fraud proceeds at ATMs near his house in Corona, California and transferred some of the fraud proceeds to his wife.

Fraud on P.Z.

- 44. In or about October 2023, a co-conspirator sent P.Z. an email purporting to be from Blue Ribbon Builders, a company P.Z. had hired to build a house in Montana. In the email, the co-conspirator requested that future payment to Blue Ribbon Builders be sent to an American First Credit Union account ending in x8215.
- 45. On or about October 10, 2023, P.Z. wired \$400,000 to the American First Credit Union account ending in x8215. That bank account is in the name of Baker Global Services, LLC and is controlled by BAKER.
- 46. On or about October 13, 2023, P.Z. wired \$137,854.95 to the American First Credit Union account ending in x8215 controlled by BAKER.
- 47. Between October 10, 2023, and October 20, 2023, BAKER conducted multiple bank-to-bank transactions from the American First Credit Union account, totaling \$527,136.22. These transfers included a total of \$26,420 transferred to an individual named F.N., \$199,216 transferred to T.P., \$191,360 transferred to S.T. and \$73,800 transferred to a savings account at American First Credit Union in the name of BAKER.

- 48. From April 2023, through September 2023, Victim Company #3 made 21 Automated Clearing House ("ACH") payments to subcontractor Quantum Dynamics, Inc. totalling \$4,525,978. These payments, however, were redirected to accounts under the control of BAKER and others.
- 49. From August 2, 2023, through August 9, 2023, a co-conspirator caused \$998,188.67 to be transferred from Victim Company #3's Citibank bank account to an account in the name of Al Hujen Group for Oil & Gas at Banner Bank. BAKER is the signer on this account. After receiving these fraudulent funds, BAKER engaged in numerous rapid transactions to move the fraudulent funds out of the Banner Bank account, including transferring funds to other accounts in his name and in the name of Baker Global Services at other banks and transferring the funds to T.P.
- 50. From May 10, 2023, to June 7, 2023, a co-conspirator caused \$1,568,494 to be transferred from Victim Company #3's Citibank account to an account in the name of Baker Global Services at Bank of the West. BAKER is the signer of this account.
- 51. From on or about September 6, 2023, through September 13, 2023, a co-conspirator caused \$754,928 from Victim Company #3's Citibank account to be wired to an account in the name of Al Hujen Group for Oil & Gas at Banner Bank. BAKER rapidly moved \$732,630 out of this account by transferring \$184,600 to T.P. and transferring \$584,030 to other bank accounts that BAKER controlled. From these accounts, BAKER wired the fraudulent funds to others, including R.K. and S.T.

- 52. On or about October 10, 2023, BAKER sent an email to a Banner Bank employee, falsely stating that Quantum Dynamics was a "trusted business partner with whom I have an ongoing professional relationship" and that Victim Company #3 often processes payments on the behalf Quantum Dynamics.
- 53. On or about October 11, 2023, BAKER emailed a Banner Bank employee a fraudulent contract between Al Hujen Group for Oil and Gas, Quantum Dynamics and Victim Company #3. In reality, neither Victim Company #3 nor Quantum Dynamics had a contract or any other business relationship with Al Hujen Group or BAKER. The fraudulent contract submitted by BAKER contained the name and forged signature of A.P., identified as the CEO of Quantum Dynamics.
- 54. On or about August 11, 2023, and October 9, 2023, BAKER emailed a Banner Bank employee two fraudulent invoices. The invoices purported to be from "Propst Companies," and utilized the legitimate logo of Propst Companies, a commercial real estate company based in Hunstville, Alabama. On these invoices, T.P. was listed as a "Logistics Manager" and T.P.'s address in Washington and telephone number were listed. T.P. has never been employed at Propst Companies and did not know of or authorize her name to be listed on these invoices.

55. In or about January 2024, Victim Company #4 transferred \$2,377,414.49 to an account it believed belonged to a vendor named Mason Builders. Instead, these funds were all transferred to an account at Fifth Third Bank in the company name Wall Edge, Inc. BAKER is the signer on this account.

56. After receiving the \$2,377,414.49 in fraudulent funds from Victim

Company #4, BAKER sent funds to another financial account under the name of Al

Hujen Group with BAKER as the signer, as well as eight additional recipients including

R.K. and T.P.

Fraud on Victim Company # 5

- 57. In or about July 2024, Victim Company #5 sent \$657,000 to an account it believed belonged to a vendor. Victim Company #5 had received an email from a coconspirator changing the wire instructions to instead go to a Plains Capital Bank account belonging to BAKER.
- 58. Soon after receiving the \$657,000 in fraudulent funds from Victim Company #5, BAKER transferred the funds to other accounts under his control and under the control of others.

All in violation of 18 U.S.C § 1956(h).

COUNT TWO

(18 U.S.C. § 1344(2) -Bank Fraud)

59. The allegations contained in paragraphs 1 through 58 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

Scheme and Artifice to Defraud

60. Beginning on a date unknown to the Grand Jury but not later than May 2022 and continuing until on or about November 4, 2024, in the District of Rhode Island, and elsewhere, the defendant,

ALEC TAHIR BAKER,

and others known and unknown to the Grand Jury, did knowingly execute, and attempt to execute, a scheme and artifice to obtain any of the money, funds, credits, assets or other property owned by, or under the custody or control of, a financial institution, by means of false and fraudulent pretenses, representations, and promises.

Objects of the Scheme to Defraud

- 61. The object of the scheme to defraud was for ALEC BAKER and others to unlawfully obtain monies through unauthorized transfers of funds from the bank accounts of individuals and companies.
- 62. The further object of the scheme to defraud was for ALEC BAKER to cause financial institutions that held accounts in his name or in the name of entities he controlled to permit BAKER to withdraw or wire funds from those accounts by means of false and fraudulent representations concerning the source of those funds.

Manner and Means of the Scheme to Defraud

63. The manner and means of the scheme to defraud were the same as the manner and means of the conspiracy to commit offenses against the United States.

Accordingly, paragraphs 22 through 31 are re-alleged and incorporated by reference as if fully set forth herein.

Acts in Furtherance of the Scheme to Defraud

64. The acts in furtherance of the Scheme to Defraud were the same as the acts in furtherance of the conspiracy to commit money laundering. Accordingly, paragraphs 32 through 58 are re-alleged and incorporated by reference as if fully set forth herein.

All in violation of 18 U.S.C. §§ 1344(2) and 2 and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THREE

(18 U.S.C. § 1028A -Aggravated Identity Theft)

- 65. The allegations contained in paragraphs 1 through 58 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
- 66. On or about October 9, 2023, in the District of Rhode Island elsewhere, the defendant,

ALEC TAHIR BAKER,

during and in relation to the felony of offense of bank fraud (18 U.S.C. § 1344(2)) and conspiracy to commit bank fraud (18 U.S.C. § 1349), did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to wit the name of T.P.

In violation of 18 U.S.C. § 1028A.

COUNT FOUR

(18 U.S.C. § 1028A - Aggravated Identity Theft)

- 67. The allegations contained in paragraphs 1 through 58 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
- 68. On or about October 11, 2023, in the District of Rhode Island elsewhere, the defendant,

ALEC TAHIR BAKER,

during and in relation to the felony of offense of bank fraud (18 U.S.C. § 1344(2)) and

conspiracy to commit bank fraud (18 U.S.C. § 1349), did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to wit the name of A.P.

In violation of 18 U.S.C. § 1028A.

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses of this Indictment, defendant

ALEC TAHIR BAKER,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. §§ 1343 and 1344, and a sum of money equal to the total amount of proceeds obtained as a result of the offenses.

All in accordance with 18 U.S.C. § 981(a)(1), as incorporated by 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

ZACHARY A. CUNHA UNITED STATES ATTORNEY

LEE H. VILKER

Assistant U.S. Attorney

Denie N. Borton

DENISE MARIE BARTON Assistant U.S. Attorney

A TRUE BILL:

Grand Jury Foreperson

Stacey Erickson

Deputy Chief, Criminal Division

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT		
BY: ☐ INFORMATION ☑ INDICTMENT ☐ COMPLAINT CASE NO. 1:24-cr-00099-JJM-PAS		
Matter Sealed: Juvenile Other than Juvenile Pre-Indictment Plea Superseding Defendant Added Indictment Charges/Counts Added Information Name of District Court, and/or Judge/Magistrate Location (City)		USA vs. Defendant: Address:
UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND Divisional Office Name and Office of Person ZACHARY A. CUNHA		
Name of A	Asst. ney Lee H. Vilker/Denise M. Barton	Interpreter Required Dialect: Birth
(if assigne	PROCEEDING	Date Female (if applicable)
Name of Complainant Agency, or Person (& Title, if any) Federal Bureau of Investigations (FBI)		Social Security Number
person is awaiting trial in another Federal or State Court (give name of court)		DEFENDANT
□ pe	is person/proceeding transferred from another district er (circle one) FRCrP 20, 21 or 40. Show District is is a reprosecution of charges	Issue: Warrant Summons Location Status: Arrest Date 11/5/2024 or Date Transferred to Federal Custody
this pen	eviously dismissed which were smissed on motion of: U.S. Atty Defense s prosecution relates to a ding case involving this same lendant. (Notice of Related se must still be filed with the	Currently in Federal Custody Currently in State Custody Writ Required Currently on bond Fugitive
beforega	or proceedings or appearance(s) or e U.S. Magistrate Judge arding this defendant were orded under MAG. JUDGE CASE NO. 1:24-MJ-00093-P/	Defense Counsel (if any):
Place of offense	RHODE ISLAND County	Appointed on Target Letter
This report amends AO 257 previously submitted		
OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS		
Total # of Counts 4		
Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged Felony/Misd.
		See Attachment Felony
		Felony Misdemeanor IFelony Misdemeanor
		Felony Misdemeanor
		Estimated Trial Days: 3
	Submit Go	

ATTACHMENT TO DEFENDANT INDICTMENT RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

DEFENDANT: ALEC TAHIR BAKER

COUNT I: – Conspiracy to Commit Money Laundering (18 U.S.C. § 1956(h))

MAXIMUM PENALTIES: Imprisonment: 20 years; Supervised release: 3 years; Fine: \$500,000; and Special assessment: \$100.

COUNT II: - Bank Fraud (18 U.S.C. § 1344(2))

MAXIMUM PENALTIES: Imprisonment: 30 years; Supervised release: 5 years; Fine: \$1,000,000; and Special assessment: \$100.

COUNT III: – Aggravated Identity Theft (18 U.S.C. § 1028A)

<u>MAXIMUM PENALTIES</u>: Imprisonment: 2 years Mandatory Minimum consecutive to underlying felony; Supervised release: 1 year; Fine: \$250,000; and Special assessment: \$100.

COUNT IV: - Aggravated Identity Theft (18 U.S.C. § 1028A)

MAXIMUM PENALTIES: Imprisonment: 2 years Mandatory Minimum consecutive to underlying felony; Supervised release: 1 year; Fine: \$250,000; and Special assessment: \$100.

FORFEITURE ALLEGATION