

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

4: CR 19
CRIMINAL NO.

361

v.

: JUDGE BRANN
: VIO: 18 U.S.C. §§1349; 1341;
: 1343; 1956;
: 1957; 1001

JABIN GODSPOWER OKPAKO
and
CHRISTINE BRADLEY OKPAKO,
Defendants

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
Conspiracy to Commit Mail
and Wire Fraud
18 U.S.C. § 1349

FILED
WILLIAMSPORT
DEC 12 2019
PER *[Signature]*
DEPUTY CLERK

A. Introduction

At times material to the Indictment:

1. Defendants Jabin Godspower Okpako and Christine Bradley Okpako (“Bradley”) resided at 803 West Lockhart Street in Sayre, Pennsylvania.

2. Okpako controlled bank accounts in the United States at TD Bank, Bank of America, M&T Bank, Community Bank, NBT Bank, First National Bank, and Wayne Bank.

3. Okpako also had access to bank accounts in the Federal Republic of Nigeria at Guaranty Trust Bank LLC and First Bank of Nigeria.

4. Christine Bradley Okpako (“Bradley”) controlled bank accounts in the United States at TD Bank, Citibank, Bank of America, JPMorgan Chase, BB&T, and a credit union account at Ingersoll-Rand Federal Credit Union.

5. TD Bank, M&T Bank, Community Bank, NBT Bank, Citibank, Bank of America, JPMorgan Chase, BB&T, Wayne Bank, and Ingersoll-Rand Federal Credit Union were financial institutions engaged in, and whose activities affected, interstate and foreign commerce.

6. Western Union, MoneyGram, World Remit, and Remitly were money service businesses (“MSB”) that conducted international wire transfers of funds for their customers.

B. The Mail and Wire Fraud Conspiracy

7. From in or about January 2016 through in or about February 2019, in Bradford County, within the Middle District of Pennsylvania, and elsewhere, the defendants,

JABIN GODSPOWER OKPAKO
and
CHRISTINE BRADLEY OKPAKO,

did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States:

(a) having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice, and attempting to do so, depositing and causing to be deposited any matter and thing whatever to be sent and delivered by any private and commercial carrier, and taking and receiving therefrom any such matter and thing, in violation of Title 18, United States Code, Section 1341.

(b) having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice, and attempting to do so, to transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds, said scheme and artifice having affected a financial institution, in violation of Title 18, United States Code, Section 1343;

C. Manner and Means – Mail and Wire Fraud Conspiracy

8. It was part of the conspiracy and scheme and artifice that the conspirators, located in both West Africa and the United States, employed the following manner and means:

9. The conspirators devised and executed a scheme to defraud multiple female victims throughout the United States, ranging between ages 55 and 85, who visited online game, relationship and dating web sites, including Instagram, Facebook, Words with Friends, and What's App.

10. The conspirators posed as various fictitious individuals, using names that included “Harry Robinson,” “Shaun Corey Roberts,” “Gilbert Thompson,” “Shawn Davids,” “General John Francis Campbell,” “Wayne Christopher,” “Todd Godson,” “Craig Henry,” and “Dennis Smith,” among others.

11. The conspirators befriended the victims through interaction and exchanges of photos on the web sites via text and instant messaging.

12. After cultivating online relationships with the victims, the conspirators fraudulently induced the victims to send and transmit to the conspirators funds for various fictitious reasons and purposes, including to assist a worker in Alaska who fell from a tower, to purchase an apartment in Washington, D.C., to assist the United Nations, to repair machinery and equipment on an oil drilling rig, to pay for medicine, to recover a \$6 million inheritance, and to make an investment in gold, among others.

13. After fraudulently inducing the victims to provide funds for these fictitious reasons, the conspirators instructed the victims to transmit checks and cash to Okpako and Bradley at their residence in

Sayre, Pennsylvania via the United States Postal Service and commercial interstate carriers, including FedEx.

14. After fraudulently inducing the victims to provide funds for these fictitious reasons, the conspirators instructed the victims to transmit funds by interstate wire and electronic funds transfers to the bank accounts controlled by the Okpako and Bradley and to the defendants via money service businesses (MSB), including Western Union, MoneyGram, and Remitly.

15. Between January 2016 through June 2019, Okpako and Bradley received and deposited, in the bank accounts that they controlled, mail and wire fraud proceeds from the victims, in the form of wire and electronic transfers, checks, and cash, as follows:

Bank	Account Name	Transaction Period	Wire In	Checks/ Cash In	MSB Transfer In
Bank of America xxxxxxx 9337	Christine Bradley	02/06/2017 - 12/20/2018	\$ 223,508.27		
Bank of America xxxxxxx 81026	Jabin G Okpako	07/27/2018 - 08/02/2018	\$ 11,831.19		
Citibank xxxxxxx 0450	Chris B Okpako	01/24/2019 - 05/31/2019	\$ 126,830.17	\$ 28,770.00	
Community Bank xxxxxxx 5735	Jabin Okpako	01/31/2019 - 02/07/2019		\$ 15,700.00	
Ingersoll-Rand FCU	Christine E Bradley	01/01/2016 - 02/28/2019		\$ 131,713.34	\$ 2,355.94

xxxxx-016, xxxxx-013, 073	Okpako Christine E Bradley				
JP Morgan Chase xxxxxx 324	Christine Bradley Okpako	03/12/2019 - 04/24/2019		\$ 46,880.00	
BB&T xxxxxxxx2856	Chris Bradley Okpako	10/04/2018 - 5/21/2019	\$ 9,500.00	\$ 55,350.00	
BB&T xxxxxxxx9823	Jabin Godspower Okpako	11/01/2018- 12/18/2018	\$61,519.75	\$ 19,760.00	
M&T Bank xxxxxx 5857	Jabin Okpako	07/25/2018 - 09/25/2018		\$ 261,010.00	
NBT Bank xxxxxx 0677 xxxxxx9479 (S)	Jabin Godspower. Okpako	01/28/2019 - 05/22/2019	\$ 11,696.70	\$ 42,790.00	
TD Bank xxxxxx 7212	Christine Bradley Okpako	02/01/2018 - 10/16/2018			
TD Bank xxxxxx 7395	Chris E Okpako	01/01/2018 - 10/31/2018	\$ 325,660.20	\$ 102,460.00	\$ 6,314.98
TD Bank xxxxxx 3633	Jabin G Okpako	06/18/2018 - 10/07/2018	\$ 278,225.47	\$ 99,510.00	\$ 4,519.99
First National Bank xxxxx8646	Jabin Godspower Okpako	01/02/2019 - 02/11/2019	\$ 20,000.00		
Wayne Bank xxxxxx 41	Jabin Godspower Okpako	2/21/2019		\$ 12,140.00	
Totals			\$ 1,068,771.75	\$ 816,083.34	\$ 13,190.91

16. As a result of the false and fraudulent pretenses, representations, and promises that the conspirators made to the victims, Okpako and Bradley received funds from the victims totaling approximately \$1,898,046.00, consisting of cash and checks received via the mails, commercial interstate carriers, and funds received via

interstate wire and electronic funds transfers to accounts they controlled.

17. On or about the following dates, Bradley received in her TD Bank account the following wire transfers of funds from the following victims of the mail and wire fraud scheme and conspiracy:

VICTIM:	DATE OF WIRE:	AMOUNT OF WIRE:
L.N.	04/16/2018	\$2,000
L.N.	04/25/2018	\$1,200
L.N.	05/10/2018	\$2,000
L.N.	06/20/2018	\$1,000
L.N.	06/28/2018	\$4,000
T.W.	06/01/2018	\$4,000
T.W.	06/20/2018	\$1,000
E.W.	06/26/2018	\$10,000

18. On or about the following dates, Okpako received in his TD Bank account the following wire transfers of funds from the following victims of the mail and wire fraud scheme and conspiracy:

VICTIM:	DATE OF WIRE:	AMOUNT OF WIRE:
J.S.	07/10/2018	\$20,000
L.N.2	08/20/2018	\$3,500
L.N.2	09/17/2018	\$2,000
L.N.2	09/24/2018	\$2,700
L.N.2	11/07/2018	\$5,000
L.N.2	11/13/2018	\$3,000
E.H.	08/24/2018	\$2,000
M.B.	09/20/2018	\$2,500

M.B.	09/21/2018	\$1,500
J.W.	10/02/2018	\$26,000
J.S.	10/04/2018	\$35,000
D.G.	10/30/2018	\$50,000
D.G.	10/30/2018	\$40,000

19. On or about the following dates, Bradley received in her BB&T account the following wire transfers of proceeds from the mail and wire fraud scheme and conspiracy:

DATE	SENDER	AMOUNT OF WIRE	RECIPIENT/ ACCT. NO
05/02/2019	DB	\$2,000.00	C. OKPAKO *2856
03/28/2019	DP	\$2000.00	C. OKPAKO *2856
05/02/2019	KA	\$2,500.00	C. OKPAKO * 2856
04/18/2019	DO	\$2,000.00	C. OKPAKO * 2856
03/11/2019	SA	\$3,000.00	C. OKPAKO * 2856
02/05/2019	DB	\$2,000.00	C. OKPAKO * 2856
11/07/2018 - 03/12/2019	27 REMITLY TRANSFERS	\$48,229.74	C. OKPAKO * 2856

20. On or about the following dates, Okpako received in his BB&T account the following wire transfers of proceeds funds from the mail and wire fraud scheme and conspiracy:

DATE	SENDER	AMOUNT OF WIRE	RECIPIENT/ ACCT. NO.
11/29/2018	SH	\$3,292.75	J. OKPAKO

			*9823
11/28/2018	ZD	\$524.00	J. OKPAKO *9823
11/27/2018	LN2	\$40,000.00	J. OKPAKO *9823
11/26/2018	TP	\$3,000.00	J. OKPAKO *9823
11/20/2018	MR	\$1,500.00	J. OKPAKO *9823
11/23/2018	PD	\$5,000.00	J. OKPAKO *9823
11/19/2018	ZD	\$603.00	J. OKPAKO *9823
11/13/2018	BA	\$2,600.00	J. OKPAKO *9823

21. On or about the following dates, Okpako and Bradley received the following shipments of cash and checks from victims of the mail and wire fraud scheme and conspiracy, via the U.S. Postal Service (“USPS”) and FedEx at their residence in Sayre, Pennsylvania:

VICTIM	DATE	INSTRUMENT	AMOUNT	DELIVERY SERVICE:	ADDRESS/ ADDRESSEE	CHECK PAYEE
JH	11/28/2018	CASH	\$3,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
JH	11/29/2018	CASH	\$3,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
JH	01/30/2019	CASH	\$3,300	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
JH	02/01/2019	CASH	\$1,100	FEDEX	AUSTIN CARTER/803 W LOCKART	N/A

					ST. SAYRE PA	
JH	02/22/2019	CASH	\$7,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
JH	03/08/2019	CASH	\$2,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
JH	04/03/2018	CASH	\$3,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
LL	03/13/2019	CASH	\$1,150	USPS	JAMES CARTER/803 W. LOCK HEART ST., SAYRE PA	N/A
LL	03/28/2019	CASH	\$750	USPS	JAMES CARTER/803 W. LOCK HEART ST., SAYRE PA	N/A
LL	03/28/2019	CASH	\$2,500	USPS	JAMES CARTER/803 W. LOCK HEART ST. SAYRE PA	N/A
BH2	05/01/2019	TELLERS CHECK	\$4,000	FEDEX	AGENT AUSTIN CARTER/ 803 W. LOCKHART ST. SAYRE PA	AUSTIN CARTER
BH	05/02/2019	CASH	\$5,000	FEDEX	AUSTIN CARTER/803 W. LOCKHART ST. SAYRE	N/A
JS3	05/02/2019	PERSONAL CHECK	\$9,500	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	JABIN GODSPOWER OKPAKO

22. On May 2, 2019, Okpako and Bradley received at their residence in Sayre, Pennsylvania two FedEx parcels sent to their address by victims of the mail and wire fraud scheme and conspiracy, one containing a \$4,000 cashier's check and the other delivered \$5,000 in cash.

23. The Grand Jury incorporates herein by reference as additional manner and means paragraphs 25 and 26 of this Indictment.

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

THE GRAND JURY FURTHER CHARGES

COUNTS 2 through 15 Mail Fraud 18 U.S.C. § 1341

24. The Grand Jury incorporates by reference herein paragraphs 1 through 6 and 8 through 22 of this Indictment.

25. Beginning in or about September 2018 and continuing through in or about May 2019, in Bradford County, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**JABIN GODSPOWER OKPAKO
and
CHRISTINE BRADLEY OKPAKO,**

having devised a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice, knowingly caused to be deposited and delivered by the United States Postal Service (“USPS”) and FedEx, a private interstate commercial carrier, packages containing cash and checks from the victims identified below, and to carry out the scheme and artifice to defraud and obtain money and property from the victims did employ the manner and means set forth in Count One of the indictment.

26. On or about the dates listed below, for the purpose of executing, and attempting to execute, the above-described scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, the conspirators fraudulently induced the victims listed below to send the cash and checks listed below, and thereby caused the cash and checks listed below to be deposited with the United States Postal Service and FedEx, to be sent and delivered by United States Postal Service and FedEx, to the address of Okpako and Bradley at 803 West Lockhart

Street, Sayre, Pennsylvania, each separate ordering, depositing and delivering constituting a separate count of this Indictment:

COUNT	VICTIM	DATE	INSTRUMENT AMOUNT	DELIVERY SERVICE	ADDRESSEE/ ADDRESS	CHECK PAYEE
2	JH	09/14/2018	CASH \$19,500	USPS	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
3	JH	11/28/2018	CASH \$3,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
4	JH	11/29/2018	CASH \$3,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
5	JH	01/30/2019	CASH \$3,300	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
6	JH	02/01/2019	CASH \$1,100	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
7	JH	02/22/2019	CASH \$7,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
8	JH	03/08/2019	CASH \$2,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
9	JH	04/03/2018	CASH \$3,000	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	N/A
10	LL	03/13/2019	CASH \$1,150	USPS	JAMES CARTER/803 W. LOCK HEART ST., SAYRE PA	N/A

11	LL	03/28/2019	CASH \$750	USPS	JAMES CARTER/803 W. LOCK HEART ST., SAYRE PA	N/A
12	LL	03/28/2019	CASH \$2,500	USPS	JAMES CARTER/803 W. LOCK HEART ST., SAYRE PA	N/A
13	BH2	05/01/2019	BANK TELLERS CHECK \$4,000	FEDEX	AGENT AUSTIN CARTER/803 W. LOCKHART ST., SAYRE PA	AUSTIN CARTER
14	BH	05/02/2019	CASH \$5,000	FEDEX	AUSTIN CARTER/803 W. LOCKHART ST. SAYRE	N/A
15	JS3	05/02/2019	PERSONAL CHECK \$9,500	FEDEX	AUSTIN CARTER/803 W LOCKART ST. SAYRE PA	JABIN GODSPOWER OKPAKO

All in violation of Title 18, United States Code, Sections 1341 and

2.

THE GRAND JURY FURTHER CHARGES:

COUNT 16
Conspiracy to Launder
Monetary Instruments
18 U.S.C. § 1956(h)

27. The Grand Jury incorporates herein paragraphs 1 through 6, 8 through 22 and 26 of this Indictment.

D. The Money Laundering Conspiracy

28. Beginning in or around February 2017, and continuing through in or about 2019, the defendants,

JABIN GODSPOWER OKPAKO
and
CHRISTINE BRADLEY OKPAKO,

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Sections 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, mail fraud and wire fraud and conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. §§ 1341; 1343; 1349, 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 Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds involving the proceeds of specified unlawful activity, that is, mail fraud and wire fraud and conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. §§ 1341; 1343; 1349, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and

(c) to knowingly engage and attempt to engage, in monetary transactions, 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, that is, mail fraud and wire fraud and conspiracy to commit mail and wire fraud, in violation of

18 U.S.C. §§ 1341; 1343; 1349, in violation of Title 18, United States Code, Section 1957.

E. Manner and Means - Money Laundering Conspiracy

29. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

30. Okpako and Bradley opened multiple bank and credit union accounts in Pennsylvania and other states for the purpose of receiving and depositing proceeds of the mail and wire fraud scheme and conspiracy and then transferring those funds from the United States to bank accounts in Nigeria.

31. Okpako and Bradley used the bank accounts that they controlled to transmit via wire and electronic funds transfers approximately \$1,849,893.65 in proceeds from the mail and wire fraud scheme and conspiracy to the bank accounts in Nigeria.

32. Okpako and Bradley used the bank and credit union accounts that they controlled in the United States to transmit wire and mail fraud proceeds, via electronic and wire funds transfers, to bank accounts in Nigeria at Guaranty Trust Bank, First City Monument Bank, and United Bank of Africa, as follows:

Bank	Account Name	Transaction Period	Wire Out	Cash Out	MSB Transfer Out
Bank of America xxxxxxx 9337	Christine Bradley	02/06/2017 - 12/20/2018	\$ 374,421.00		
Bank of America xxxxxxx 81026	Jabin G Okpako	07/27/2018 - 08/02/2018			
Citibank xxxxxxx 0450	Chris B Okpako	01/24/2019 - 05/31/2019	\$ 141,584.44	\$ 25,020.00	
Community Bank xxxxxxx 5735	Jabin Okpako	01/31/2019 - 02/07/2019		\$ 15,750.15	
Ingersoll-Rand FCU xxxxx-016, xxxxx-013, 073	Christine E Bradley Okpako Christine E Bradley	01/01/2016 - 02/28/2019		\$ 76,587.00	\$ 27,267.80
JP Morgan Chase xxxxxxx 324	Chris Bradley Okpako	03/12/2019 - 04/24/2019	\$ 46,550.00		
BB&T BANK xxxxxxx2856	Chris Bradley Okpako	10/04/2018 - 05/21/2019		\$ 5,686.00	\$ 51,664.69
BB&T BANK xxxxxxx9823	Jabin Godspower Okpako	11/01/2018 - 12/18/2018	\$ 13,900.00	\$65,163.45	\$ 4,244.98
M&T Bank xxxxxxx 5857	Jabin Okpako	07/25/2018 - 09/25/2018	\$ 256,625.00		
NBT Bank xxxxxxx 0677 xxxxxxx9479 (S)	Jabin Godspower Okpako	01/28/2019 - 05/22/2019	\$ 4,930.00		
TD Bank xxxxxxx 7212	Christine Bradley Okpako	02/01/2018 - 10/16/2018	\$ 21,559.00		
TD Bank xxxxxxx 7395	Chris E Okpako	01/01/2018 - 10/31/2018	\$ 274,266.00	\$ 4,536.00	\$ 56,649.56
TD Bank xxxxxxx 3633	Jabin G Okpako	06/18/2018 - 10/07/2018	\$ 232,135.00	\$ 81,127.00	58,086.58
Wayne Bank xxxxxxx 41	Jabin Godspower Okpako	2/21/2019	\$ 12,140.00		

Totals			\$ 1,378,110.44	\$ 273,869.60	\$ 197,913.61
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33. To conceal the nature, location, source, and control of the mail and wire fraud proceeds, Bradley and Okpako used the proceeds to make multiple bank and ATM deposit transactions, during short intervals of time, in amounts below the \$10,000 level requiring the filing of currency transaction reports, at various bank branches in Pennsylvania, New York, New Jersey, and Maryland.

34. Between January 1, 2018 and October 31, 2018, Bradley received and deposited mail and wire fraud proceeds totaling approximately \$434,435.18 into her account at TD Bank, at 10 different TD branches in Florida and New York.

35. Between January 24, 2019 and May 31, 2019, Bradley made multiple ATM deposits of mail and wire fraud proceeds, totaling \$155,600.17, into her Citibank account, and made wire transfers to accounts in Nigeria totaling \$41,584.44.

36. Between March 12, 2019 and April 24, 2019, Bradley moved approximately \$46,880 in mail and wire fraud proceeds through her account at JPMorgan Chase by conducting multiple ATM deposits into her account at multiple JPMorgan Chase branches in New York, and

then making online wire transfers of the funds to bank accounts in Nigeria.

37. Between February 6, 2017 and December 20, 2018, Bradley transferred mail and wire fraud proceeds totaling approximately \$374,421 through her Bank of America accounts in the United States to bank accounts in Nigeria.

38. Between October 4, 2018 and May 21, 2019, Bradley received and deposited mail and wire fraud proceeds totaling \$55,350 into her BB&T account, via approximately 22 ATM and counter deposit transactions at the BB&T branch in Muncy, Pennsylvania, including \$22,000 in cash deposits.

39. During the approximately two and one-half month period between February 6, 2019 and April 19, 2019, Bradley made 13 separate deposits of mail and wire fraud proceeds, totaling \$28,500, into her account at BB&T.

40. On February 26, 2019, between 10:56 am and 10:59 am, Bradley made three separate cash ATM deposits of mail and wire fraud proceeds into her BB&T account ranging between \$700 and \$4,800.

41. Between February 15, 2013 and October 24, 2018, Bradley wire transferred mail and wire fraud proceeds totaling \$35,777 via Western Union to Okpako and other individuals in Nigeria and Ghana in 180 separate wire transfer transactions.

42. Between November 25, 2015 through January 11, 2017, Bradley transferred mail and wire fraud proceeds totaling \$32,610, in 173 separate transactions, via World Remit, to Okpako in Nigeria.

43. Between November 6, 2018 and March 12, 2019, Bradley transferred, and attempted to transfer, via Remitly, mail and wire fraud proceeds totaling \$146,690, in 61 attempted and 31 completed transactions to conspirators in Nigeria.

44. Between July 25, 2018 and September 25, 2018, Okpako used mail and wire fraud proceeds received from the victims of the mail and wire fraud scheme and conspiracy to make 90 separate ATM cash deposits and four in-person deposits at branches of M&T Bank in Pennsylvania and New York, totaling approximately \$260,000, and then wire transferred approximately \$256,000 to an account at Guaranty Trust Bank in Nigeria.

45. When questioned by M&T Bank employees about the source of the funds deposited and transmitted to Nigerian bank accounts and the purpose of the transfers, Okpako stated that he obtained the funds from performing odd jobs and the funds were to pay for the purchase of products and properties.

46. Between January 28, 2019 and February 7, 2019, Okpako made multiple cash deposits of mail and wire fraud proceeds totaling \$15,700 at multiple Community Bank branches, including a branch in Kingston, Pennsylvania, and then made two unsuccessful attempts to transfer \$15,574 to Nigeria, initially at the Towanda, Pennsylvania branch, and then at the Johnson City, New York branch.

47. When questioned about the source of the cash deposits by employees at the Towanda Branch of Community Bank, Okpako stated that he obtained the cash from buying and selling wristwatches.

48. From January 2, 2019 through May 22, 2019, Okpako received and deposited approximately \$54,486 in mail and wire fraud proceeds into his account at NBT Bank, which included three ATM cash deposits and one branch teller deposit at separate branch locations in New York and New Jersey totaling \$13,270, two incoming deposits from

a victim of the mail and wire fraud scheme and conspiracy, and wire transfers to an account in Nigeria and to Bradley's Citibank account.

49. Between July 13, 2018 through August 2, 2018, Okpako opened his Bank of America account in New York and made cash deposits and received incoming wire transfers of mail and wire fraud proceeds, totaling approximately \$11,831, at branches in Maryland and New York.

50. From June 18, 2018 through October 31, 2018 when the account was closed by the bank, Okpako moved mail and wire fraud proceeds, totaling \$377,735.47, through one of his accounts at TD Bank, including 36 incoming wire transfers from victims of the mail and wire fraud scheme and conspiracy, totaling approximately \$278,225.47, and outgoing wire transfers to bank accounts in Nigeria, totaling approximately \$232,000.

51. From January 2, 2019 through January 16, 2019, Okpako attempted to wire transfer mail and wire fraud proceeds totaling \$22,674 from his account at First National Bank of Pennsylvania to bank accounts in Nigeria, but the bank declined to conduct the transfer after bank employees discovered that the source of the funds transfer

was a \$20,000 wire transfer deposit from a victim of the mail and wire fraud scheme and conspiracy.

52. From December 10, 2018 through December 12, 2018, Okpako attempted to open an account at Fidelity Bank at the bank's Green Ridge Branch in Scranton, Pennsylvania, but bank employees closed the account after Okpako asked bank employees if the bank would file reports based upon multiple cash deposits.

53. From January 28, 2019 through April 19, 2019, Okpako opened a Fidelity Bank checking account in his name at the Kingston, Pennsylvania branch and moved mail and wire fraud proceeds, totaling \$6,950, into the account before it was closed by bank employees based on suspicious incoming wire transfers to the account and the distance of the bank branch from Okpako's residence in Sayre, Pennsylvania.

54. The grand jury incorporates by reference herein paragraphs 56 through paragraph 62 as additional manner and means of the money laundering conspiracy.

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

THE GRAND JURY FURTHER CHARGES:

**COUNTS 17 to 26
Money Laundering
18 U.S.C. § 1956 (a)(2)(B)(i)**

55. The Grand Jury incorporates herein paragraphs 1 through 6, 8 through 22, 26 and 29 through 53 of this Indictment.

56. On or about the dates and in the following amounts set forth below, in Bradford County, within the Middle District of Pennsylvania, the defendant,

CHRISTINE BRADLEY OKPAKO,

did transmit, transfer, and attempt to transmit and transfer funds, that is, proceeds of the mail and wire fraud scheme, from places in the United States, via the Internet, to a place outside the United States, that is Guaranty Trust Bank and First Bank of Nigeria in Nigeria, knowing that the funds involved in the transportation represented the proceeds of some form of unlawful activity and knowing that such transportation was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit: mail fraud and wire fraud and

conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. §§
1341; 1343; 1349:

COUNT	DATE	U.S. BANK, BRANCH & ACCOUNT NUMBER	AMOUNT	NIGERIAN BANK & ACCOUNT NUMBER
17	05/17/2017	Bank of America -9337	\$6,818.00	FIRST BANK OF NIGERIA -2256
18	08/01/2017	BANK OF AMERICA -9337	\$2,540.00	FIRST BANK OF NIGERIA -8681
19	08/08/2017	BANK OF AMERICA/NY -9337	\$665.00	FIRST BANK OF NIGERIA -2256
20	08/17/2017	BANK OF AMERICA -9337	\$1,755.00	FIRST BANK OF NIGERIA -9489
21	08/28/2017	BANK OF AMERICA -9337	\$1,305.00	FIRST BANK OF NIGERIA -8681
22	11/03/2017	BANK OF AMERICA -9337	\$ 8,000.00	FIRST BANK OF NIGERIA -2256
23	11/17/2017	BANK OF AMERICA -9337	\$13,555.00	FIRST BANK OF NIGERIA - 1716
24	11/17/2017	BANK OF AMERICA -9337	\$14,655.00	FIRST BANK OF NIGERIA - 6624
25	03/26/2019	JPMORGAN CHASE -3324	\$6,710.00	Guaranty Trust Bank -2427
26	04/24/2019	JPMORGAN CHASE -3324	\$13,790.00	Guaranty Trust Bank /Nigeria -2888

In violation of Title 18, United States Code, Sections
1956(a)(2)((B)(i) and 2.

THE GRAND JURY FURTHER CHARGES:

**COUNTS 27 to 37
Money Laundering
18 U.S.C. § 1956 (a)(2)(B)(i)**

57. The Grand Jury incorporates herein paragraphs 1 through 6, 8 through 22, 26, 29 through 53 and the factual allegations of paragraph 56 of this Indictment.

58. On or about the dates and in the following amounts set forth below, in Bradford County, within the Middle District of Pennsylvania, the defendant,

JABIN GODSPOWER OKPAKO,

did transmit, transfer, and attempt to transmit and transfer funds, that is, proceeds of the mail and wire fraud scheme, from places in the United States, specifically Sayre and Towanda, in Bradford County, Pennsylvania, to a place outside the United States that is Guaranty Trust Bank in Nigeria, knowing that the funds involved in the transportation represented the proceeds of some form of unlawful activity and knowing that such transportation was designed in whole or in part to conceal and disguise the nature, location, source, ownership,

and control of the proceeds of specified unlawful activity, to wit: mail fraud and wire fraud and conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. §§ 1341; 1343; 1349:

COUNT	DATE	U.S. BANK, BRANCH & ACCOUNT NUMBER	AMOUNT	NIGERIAN BANK & ACCOUNT NUMBER
27	08/06/2018	MT&T BANK/SAYRE -5857	\$7,925	Guaranty Trust Bank -2427
28	08/13/2019	MT&T BANK/SAYRE -5857	\$36,500	Guaranty Trust Bank -2427
29	08/22/2019	MT&T BANK/SAYRE -5857	\$5,500	Guaranty Trust Bank -2427
30	08/27/2019	MT&T BANK/SAYRE -5857	\$41,200	Guaranty Trust Bank -2427
31	08/30/2019	MT&T BANK/SAYRE -5857	\$26,400	Guaranty Trust Bank -2427
32	09/04/2019	MT&T BANK/SAYRE -5857	\$26,300	Guaranty Trust Bank -2427
33	09/06/2019	MT&T BANK/SAYRE -5857	\$17,500	Guaranty Trust Bank -2427
34	09/10/2019	MT&T BANK/SAYRE -5857	\$13,000	Guaranty Trust Bank -2427
35	09/14/2019	MT&T BANK/SAYRE -5857	\$17,400	Guaranty Trust Bank -2427
36	09/19/2019	MT&T BANK/SAYRE -5857	\$34,000	Guaranty Trust Bank -2427

37	02/06/2019	COMMUNITY BANK -Towanda Branch	(attempted) \$15,574	Guaranty Trust Bank -2427
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All in violation of Title 18, United States Code, Sections 1956(a)(2)((B)(i) and 2.

THE GRAND JURY FURTHER CHARGES:

**COUNTS 38 to 44
Engaging in Monetary Transactions
in Property Derived from Specified Unlawful Activity
18 U.S.C. § 1957**

59. The Grand Jury incorporates herein paragraphs 1 through 6, 8 through 22, 26, 29 through 53 and the factual allegations of paragraphs 56 and 58 of this Indictment.

60. On or about the dates and in the amounts set forth below, in Bradford County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

CHRISTINE BRADLEY OKPAKO,

did knowingly engage and attempt to engage in the following monetary transactions by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value

greater than \$10,000, that is the international transfer of funds, such property having been derived from a specified unlawful activity, that is, mail fraud and wire fraud and conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. §§ 1341; 1343; 1349:

COUNT	DATE	U.S. BANK, BRANCH & ACCOUNT NUMBER	AMOUNT	NIGERIAN/GHAN A BANK & ACCOUNT NUMBER
38	08/04/2017	Bank of America -9337	\$25,130.00	ECOBANK -4101
39	09/06/2017	Bank of America -9337	\$17,805.00	First Bank of Nigeria -
40	09/12/2017	Bank of America -9337	\$15,300.00	Fidelity Bank -3110
41	09/13/2017	Bank of America -9337	\$17,400.00	-First Bank of Nigeria -0584
42	09/19/2017	Bank of America -9337	\$10,045.00	EcoBank Ghana - 1901
43	09/25/2017	Bank of America -9337	\$14,955.00	EcoBank Ghana -4101
44	04/24/2019	JP Morgan Chase	\$13,790.00	Guaranty Trust Bank -2888

All in violation of Title 18, United States Codes, Sections 1957 and

2.

THE GRAND JURY FURTHER CHARGES:

**COUNTS 45 to 53
Engaging in Monetary Transactions
in Property Derived from Specified Unlawful Activity
18 U.S.C. § 1957**

61. The Grand Jury incorporates herein paragraphs 1 through 6, 8 through 22, 26, 29 through 53 and the factual allegations of paragraphs 56, 58 and 60 of this Indictment.

62. On or about the dates and in the amounts set forth below, in Bradford County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

JABIN GODSPOWER OKPAKO,

did knowingly engage and attempt to engage in the following monetary transactions by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the international transfer of funds, such property having been derived from a specified unlawful activity, that is, mail fraud and wire fraud and conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. §§ 1341; 1343; 1349:

COUNT	DATE	U.S. BANK, BRANCH & ACCOUNT NUMBER	AMOUNT	NIGERIAN BANK & ACCOUNT NUMBER

45	08/13/2019	MT&T BANK/SAYRE -5857	\$36,500	Guaranty Trust Bank -2427
46	08/27/2019	MT&T BANK/SAYRE -5857	\$41,200	Guaranty Trust Bank -2427
47	08/30/2019	MT&T BANK/SAYRE -5857	\$26,400	Guaranty Trust Bank -2427
48	09/04/2019	MT&T BANK/SAYRE -5857	\$26,300	Guaranty Trust Bank -2427
49	09/06/2019	MT&T BANK/SAYRE -5857	\$17,500	Guaranty Trust Bank -2427
50	09/10/2019	MT&T BANK/SAYRE -5857	\$13,000	Guaranty Trust Bank -2427
51	09/14/2019	MT&T BANK/SAYRE -5857	\$17,400	Guaranty Trust Bank -2427
52	09/19/2019	MT&T BANK/SAYRE -5857	\$34,000	Guaranty Trust Bank -2427
53	02/06/2019	COMMUNITY BANK -Towanda Branch	(attempted) \$15,574	Guaranty Trust Bank -2427

All in violation of Title 18, United States Codes, Sections 1957 and

2.

THE GRAND JURY FURTHER CHARGES:

**COUNT 54
False Statements
18 U.S.C. § 1001**

63. The Grand Jury incorporates herein paragraphs 1 through 6, 8 through 22, 26, 29 through 53 and the factual allegations of paragraphs 56, 58, 60 and 62 of this Indictment.

64. On or about February 8, 2019, in Bradford County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

JABIN GODSPOWER OKPAKO,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by falsely stating to special agents of the Federal Bureau of Investigation (“FBI”) and Department of Homeland Security (“DHS”), specifically during an interview on February 8, 2019 by FBI and DHS agents investigating international transfers of mail and wire fraud proceeds from the United States to Nigeria, the defendant falsely stated that he did not open or maintain any bank accounts in the United States, when in fact those statements and representations were false because, as JABIN GODSPOWER OKPAKO then and there knew, OKPAKO had opened prior to the interview a number of bank accounts in his name at M&T Bank, TD Bank, Bank of America, Community

Bank, First National Bank, and Wayne Bank which he used to make deposits and transfer funds to accounts in Nigeria.

All in violation of Title 18, United States Code, Section 1001.

THE GRAND JURY FINDS:

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 53 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982.

2. Pursuant to Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982, upon conviction of an offense in violation of Title 18, United States Code, Section 1349, Title 18, United States Code, Section 1341, Title 18, United States Code, Section 1956 and Title 18, United States Code, 1957.

JABIN GODSPOWER OKPAKO

and
CHRISTINE BRADLEY OKPAKO

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense.

3. By virtue of the commission of the offenses charged in Count 1 through 53 of this Indictment by the defendants,

JABIN GODSPOWER OKPAKO
and
CHRISTINE BRADLEY OKPAKO

any and all right, title, and interest the defendants may have had in the any of the property involved in or traceable to the offense alleged in Counts 1 through 53 of this Indictment is vested in the United States and is hereby forfeited to the United States pursuant to Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982.

4. The property to be forfeited includes:

a. United States currency in the amount of \$1,849,893.65;

- b. \$33,820 in U.S. Currency recovered during the execution of a search warrant on May 2, 2019 at 803 West Lockhart Street in Sayre, Pennsylvania.
- c. All funds on deposit in the following accounts:
 - i. Bank of America account ending in 9337 in the name of Christine Bradley;
 - ii. Bank of America account ending in 81026 in the name of Jabin Godspower Okpako;
 - iii. Citibank account ending in 0450 in the name of Chris Bradley Okpako;
 - iv. Community Bank account ending in 5735 in the name of Jabin Okpako;
 - v. Ingersoll-Rand FCU accounts ending in 016, 013, and 073 in the name of Christine E. Bradley Okpako and Christine E. Bradley;
 - vi. JP Morgan Chase account ending in 324 in the name of Chris Bradley Okpako;
 - vii. M&T Bank account ending in 5857 in the name of Jabin Okpako;
 - viii. NBT Bank accounts ending in 0677 and 9479(S) in the name of Jabin G. Okpako;
 - ix. TD Bank account ending in 7212 in the name of Christine Bradley Okpako;

- x. TD Bank ending in 7395 in the name Chris B. Okpako;
- xi. TD Bank ending in 3633 in the name of Jabin G. Okpako; and
- xii. Wayne Bank ending in 41 in the name of Jabin Godspower Okpako.

5. If any of the property involved in or traceable to the offenses alleged in Counts 1 through 53 of this Indictment, 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL



FOREPERSON

Date: 12-12-19

DAVID J. FREED
United States Attorney

BY:


GEORGE J. ROCKTASHEL
Assistant United States Attorney