

**UNDER SEAL**

Eastern District of Kentucky

**FILED**

AUG 15 2019

AT LEXINGTON  
ROBERT R. CARR  
CLERK U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENTUCKY  
CENTRAL DIVISION  
LEXINGTON**

**UNITED STATES OF AMERICA**

**V.**

**INDICTMENT NO. 5:19-CR-139-JmH**

**THOMAS D. INKOOM,  
BAAKI ABDUL MAJEED, and  
KAHAD A. WUUPINI**

\* \* \* \* \*

**THE GRAND JURY CHARGES:**

**Background**

1. Defendant **THOMAS D. INKOOM**, a citizen of Ghana with permanent resident status in the United States, was a resident of Newark, New Jersey, with a business located in Bronx, New York.

2. At all relevant times, Defendant **THOMAS D. INKOOM** owned, operated or was registered agent of a business named Lucky Star Auto, registered in May 2017, in New York.

3. At all relevant times, Defendant **THOMAS D. INKOOM** opened and had signatory authority of bank account \*\*\*-\*\*\*4825, in the name of Lucky Star Auto, at TD Bank, registered to a New York address, and bank account \*\*\*\*\*9074, in the name of **THOMAS D. INKOOM**, dba Lucky Star Auto, at Capital One, registered to a New Jersey address.

4. Defendant **BAAKI ABDUL MAJEED**, a U.S. citizen, was a resident of Tacoma, Washington.

5. At all relevant times, Defendant **BAAKI ABDUL MAJEED** owned, operated or was registered agent of a business named All Green Global, registered in Washington.

6. At all relevant times, Defendant **BAAKI ABDUL MAJEED** opened and had signatory authority of bank account \*\*\*\*\*0269 in the name of **BAAKI ABDUL MAJEED** and T.A.M., and bank account \*\*\*\*\*4796 in the name of **BAAKI ABDUL MAJEED**, both at US Bank, registered to a Washington address, and bank account \*\*\*\*\*8593, in the name of **BAAKI ABDUL MAJEED**, dba All Green Global, at US Bank, registered to a Washington address.

7. Defendant **KAHAD A. WUUPINI**, a citizen of Ghana with permanent resident status in the United States, was a resident of Auburn, Washington.

8. At all relevant times, Defendant **KAHAD A. WUUPINI** owned, operated or was registered agent of a business named Bradas Delivery and Shipping Service, registered in Washington.

9. At all relevant times, Defendant **KAHAD A. WUUPINI** opened and had signatory authority of bank accounts \*\*\*\*-\*\*\*\*-6323 and \*\*\*\*-\*\*\*\*-2118, both in the name of **KAHAD A. WUUPINI** Sole Prop, dba Bradas Delivery and Shipping Service, at Bank of America, and both registered to a Washington address.

**COUNT 1**  
**18 U.S.C. § 1349**

10. Paragraphs 1 through 9 are realleged and incorporated by reference as if fully set forth herein.

11. Beginning on a date unknown, but no later than April 6, 2017, through at least October 13, 2017, in the Eastern District of Kentucky, and elsewhere,

**BAAKI ABDUL MAJEED,  
KAHAD A. WUUPINI,**

and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit wire fraud, that is, having devised and intending to devise a scheme for obtaining money by means of materially false and fraudulent pretenses, representations, and promises, transmitted or caused to be transmitted by means of wire communications in interstate commerce writings, signs and signals for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

**Manner and Means**

12. **BAAKI ABDUL MAJEED, KAHAD A. WUUPINI**, and their co-conspirators targeted Victim A, an individual in Nicholasville, Kentucky, through an online social networking site. The defendants and their co-conspirators committed an online romance fraud scheme against Victim A by impersonating a man named “James Nehmer”. Victim A believed she was in a romantic relationship with “Nehmer”. Over the course of their relationship, the defendants and their co-conspirators, through interstate wire communications, convinced Victim A to send hundreds of thousands of

dollars to invest in a purported gold and jewels investment. In fact, there was no such investment.

13. Between on or about April 22, 2017, and on or about September 5, 2017, at the direction of “Nehmer”, Victim A mailed personal checks, cashier’s checks, and cash, to the following persons and entities:

<b>Date Issued</b>	<b>Pay To/Sent To</b>	<b>Presented To</b>	<b>Check #</b>	<b>Amount</b>
4/22/2017	Bradas D and S Services	Bank of America Account *2118	27975676	\$50,000
4/22/2017	Majeed Baaki	US Bank Account *0269	27975725	\$50,000
4/27/2017	Bradas D and S Services	Bank of America Account *2118	27993085	\$61,500
4/27/2017	Majeed Baaki	US Bank Account *4796	27993100	\$61,500
4/27/2017	Bradas D and S Services	Bank of America Account *6323	25140496	\$27,000
5/1/2017	Baaki Abdul Majeed		Cash	\$21,000
5/25/2017	Majeed Baaki	US Bank Account *4796	28123330	\$95,000
5/25/2017	Bradas D and S Services	Bank of America Account *6823	28123315	\$95,000
5/31/2017	Majeed Baaki	US Bank Account *0269	28143970	\$34,500
5/31/2017	Bradas D and S Services	Bank of America Account *2118	28143948	\$34,500
5/31/2017	Thomas Inkoom	Capital One Account *9074	28143901	\$50,000
5/31/2017	Lucky Star Auto	TD Bank Account *4825	28143922	\$50,000
8/9/2017	Baaki Majeed	US Bank Account *0269	6033	\$15,000
8/14/2017	Baaki Majeed	US Bank Account *0269	6039	\$15,000
8/22/2017	All Green Global	US Bank Account *8593	884512671	\$20,000

8/25/2017	All Green Global	US Bank Account *8593	884512691	\$40,000
9/5/2017	All Green Global	US Bank Account *8593	884512738	\$37,000

14. At the direction of “Nehmer,” in certain instances, Victim A put “MERCEDES G” or “CONDO” in the memo line of the check. Victim A did not purchase a Mercedes or a condo with any of the individuals involved.

All in violation of Title 18, United States Code, Sections 1343 and 1349.

**COUNT 2**  
**18 U.S.C. § 1956(h)**

15. Paragraphs 1 through 9 are realleged and incorporated by reference as if fully set forth herein.

16. Beginning on a date unknown, but no later than April 12, 2017, through at least October 13, 2017, in the Eastern District of Kentucky, and elsewhere,

**THOMAS D. INKOOM,  
BAAKI ABDUL MAJEED, and  
KAHAD A. WUUPINI**

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, Section 1956 and Section 1957, to wit:

(a) 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, 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) knowingly 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, wire fraud, 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) knowingly engage and attempt to engage, in monetary transactions by, through, or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is wire transfers and monetary instruments, such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1957.

#### **Manner and Means**

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

18. It was part of the conspiracy that the defendants and their co-conspirators opened and managed domestic bank accounts in order to receive and negotiate United

States currency from Victim A.

19. It was part of the conspiracy that the defendants and their co-conspirators created, registered and used businesses to facilitate receiving and negotiating United States currency from Victim A.

20. It was a part of the conspiracy that between on or about April 22, 2017, and on or about September 5, 2017, Victim A sent a total of \$757,000 to the defendants as a result of fraudulent misrepresentations made to Victim A using interstate wires.

21. It was further part of the conspiracy that in the course of defrauding Victim A into sending monetary instruments and cash, the defendants and their co-conspirators provided personal names, business names, addresses, and phone numbers to which Victim A should send the monetary instruments and cash.

22. It was further part of the conspiracy that the defendants and their co-conspirators deposited the money received from Victim A into their personal and business accounts and then disbursed the money to other accounts by withdrawing sums of money, obtaining cashier's checks, writing checks and wiring funds to each other, or other individuals or entities in the United States and Ghana, all to conceal the nature, source, and control of those assets.

23. It was further part of the conspiracy that the defendants and their co-conspirators would engage in monetary transactions by, to, or through financial institutions, in criminally derived property of a value greater than \$10,000.

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

**COUNTS 3-12**  
**18 U.S.C. § 1957**

24. On or about the dates listed below, in the Eastern District of Kentucky, and elsewhere, the defendants as identified below, did 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 deposit, withdraw, transfer, and exchange United States currency, funds, and monetary instruments, such property having been derived from a specified unlawful activity, that is, wire fraud.

<b>Count</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Type</b>	<b>Amount</b>
3	4/28/2017	<b>KAHAD A. WUUPINI</b> Account *2118	Muscle Motor Auto Sales	Cashier's Check #0087411116	\$24,000
4	5/9/2017	<b>BAAKI ABDUL MAJEED</b> Account *4796	Empire Exotic Motors, Inc.	Cashier's Check #3425520107	\$61,000
5	5/9/2017	<b>KAHAD A. WUUPINI</b> Account *2118	Empire Exotic Motors, Inc.	Cashier's Check #0087411244	\$61,000
6	5/23/2017	<b>BAAKI ABDUL MAJEED</b> Account *0269	Kahad Wuupini Account *6323	Check #0193	\$15,062
7	5/30/2017	<b>BAAKI ABDUL MAJEED</b> Account *0269	Kahad Wuupini Account *8777	Check #0194	\$15,062
8	6/5/2017	<b>KAHAD A. WUUPINI</b> Account *6323	Abdul S. Mumuni	Bank transfer to Account *0515	\$50,000
9	6/8/2017	<b>BAAKI ABDUL MAJEED</b> Account *4796	Yahaya Kubura	International Wire to Beneficiary AC #*6565 Stanbic Bank Ghana Limited, Ghana	\$30,026
10	6/13/2017	<b>BAAKI ABDUL MAJEED</b> Account *4796	Abdul Majeed Abdul Rafic	International Wire to Beneficiary AC #*3230 Guaranty Trust Bank, Ghana	\$30,000



11	6/20/2017	<b>KAHAD A. WUUPINI</b> Account *6323	Marako Interprise	International Wire to Stanbic Bank Ghana Limited, Ghana	\$18,600
12	6/29/2017	<b>KAHAD A. WUUPINI</b> Account *6323	IAAI	Cashier's Check #1087707574	\$14,233

In violation of Title 18, United States Codes, Section 1957.

**FORFEITURE ALLEGATIONS**

**18 U.S.C. § 981(a)(1)(C)**

**28 U.S.C. § 2461**

**18 U.S.C. § 982(a)(1)**

25. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

26. Upon conviction of the offense in violation of Title 18, United States Code, Section 1349 set forth in Count 1 of this Indictment, the defendants, **BAAKI ABDUL MAJEED** and **KAHAD A. WUUPINI**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

27. The allegations contained in Counts 2-12 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(1).

28. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956 or

1957 , the defendants, **THOMAS D. INKOOM, BAAKI ABDUL MAJEED,** and **KAHAD A. WUUPINI,** shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

29. The property to be forfeited includes, but is not limited to, the following:

**MONEY JUDGMENT:**

A sum representing the gross proceeds in aggregate obtained by each of the defendants, **THOMAS D. INKOOM, BAAKI ABDUL MAJEED,** and **KAHAD A. WUUNPINI,** as a result of the wire fraud violations alleged in this Indictment and representing the property involved in or traceable to the money laundering violations alleged in this Indictment.

30. If any of the property described above, as a result of any act or omission of the defendants:

- 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), as incorporated by Title 28, United States Code, Section 2461(c).

**A TRUE BILL**

A handwritten signature in black ink, appearing to read "Robert M. Duncan, Jr.", written over a horizontal line.

**ROBERT M. DUNCAN, JR.  
UNITED STATES ATTORNEY**

**PENALTIES**

**COUNT 1:** Imprisonment for not more than 20 years, fine of not more than \$250,000 or twice amount of gross gain or loss, and supervised release for not more than 3 years.

**COUNT 2:** Imprisonment for not more than 20 years, fine of not more than \$500,000 or twice amount of gross gain or loss, and supervised release for not more than 3 years.

**COUNTS 3-12:** Imprisonment for not more than 10 years, fine of not more than \$250,000, and supervised release for not more than 3 years.

**PLUS:** Mandatory special assessment of \$100 per count.

**PLUS:** Restitution, if applicable.

**PLUS:** Forfeiture, as listed.