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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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| UNITED STATES OF AMERICA | : | Hon. | |
| | : | | |
| v. | : | Crim. No. | <i>23cr 282 (CPO)</i> |
| | : | | |
| MARTINS INALEGWU, | : | 18 U.S.C. §§ 1341, 1343, 1349 | |
| STEINCY MATHIEU, | : | 18 U.S.C. §§ 1956 | |
| MOSES CHUKWUEBUKA | : | 18 U.S.C. §§ 1957, 1960 | |
| ALEXANDER, and | : | 26 U.S.C. § 7201 | |
| OLUWASEYI FATOLU | : | 18 U.S.C. § 2 | |

INDICTMENT

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

COUNT 1

(Conspiracy to Commit Wire and Mail Fraud, 18 U.S.C. § 1349)

1. At all times relevant to this Indictment:
 - a. Internet fraud is the use of Internet services or software with

internet access to defraud victims or to otherwise take advantage of them. Perpetrators of Internet crime schemes steal millions of dollars each year from victims. Criminal organizations that perpetrate internet fraud schemes require networks of individuals to launder the fraud proceeds through the financial system in a manner that conceals and disguises the nature, location, source, ownership, and control of those proceeds. Members of the wire fraud and money laundering conspiracy charged in this Indictment laundered proceeds of internet fraud schemes, to include "romance fraud" and "apartment rental fraud" schemes.

- b. A "romance fraud" is a specific type of fraudulent conduct in which a perpetrator feigns romantic intentions towards a victim. The perpetrator

frequently meets the victim through an online dating website or application and adopts a fraudulent or stolen identity in aid of the perpetrator's scheme. Over time, weeks or months, the perpetrator cultivates a romantic relationship with the targeted victim through online messaging, emails, text messaging, or voice calls, to gain his or her affection and trust. Once the perpetrator gains the victim's affection, the perpetrator uses that goodwill to commit fraud against that victim, or uses that victim as an unwitting accomplice in other fraudulent schemes. One common tactic is that the perpetrator turns the romance fraud victim into a "money mule" by tricking the victim into receiving money from other victims and then sending money through interstate wire transfers to bank accounts controlled by the perpetrator or their co-conspirators.

c. Apartment rental scams are fraudulent scams involving the rental of a property, not owned or controlled by the perpetrators, for the purpose of collecting money from the victims in the form of application fees and security deposits. The perpetrators list advertisements on-line, entice victims with information about the properties, pretend they are authorized to rent the properties, and then direct that the victims complete applications and send money to either the perpetrator or co-conspirators, in the form of down payments to reserve the properties. The perpetrators communicate with the victims by email, and the scam email accounts used to communicate with victims are operated by the perpetrators or co-conspirators of the perpetrators.

d. The defendants Martins INALEGWU and Steincy MATHIEU were a married couple and residents of New Jersey. MATHIEU is a United States

citizen. INALEGWU is a citizen of Nigeria and in June 2018 was granted legal permanent resident status in the United States. Defendants INALEGWU and MATHIEU maintained bank accounts at among other financial institutions, Bank of America, M&T Bank, Wells Fargo Bank, N.A., TD Bank, N.A., Republic Bank and JP Morgan Chase (JPMC) Bank.

e. Bank of America, M&T Bank, Wells Fargo Bank, N.A., TD Bank, Republic Bank and JP Morgan Chase were “financial institutions” within the meaning of Title 18, United States Code, Section 20.

f. The defendant Moses Chukwuebuka ALEXANDER was a citizen of Nigeria and believed to reside in Nigeria and/or Turkey.

g. The defendant Oluwaseyi FATOLU was a United States citizen and a resident of New Jersey. FATOLU operated an unlicensed money transmitting businesses in and around Irvington, New Jersey.

h. Inalsbech was a registered business in New Jersey associated with defendant INALEGWU. While documents listed the principal line of business as “lessors of other real estate property” and “sell, develop and manage property for others,” there is no record of actual business activity, income and/or expenses for Inalsbech. Instead, this company and its bank accounts were used to conceal and disguise the nature, location, source, ownership and control of the fraud proceeds.

i. Inalsbech LLC was another registered business in New Jersey and associated with defendants INALEGWU and MATHIEU. While documents listed the principal line of business as “buys and sells home, rents out homes” and “flipping houses,” there is no record of actual business activity, income, and/or

expenses for Inalsbech, LLC. Instead, this company and its bank accounts were used to conceal and disguise the nature, location, source, ownership and control of the fraud proceeds.

j. Morachi Nigeria Limited was a business that operated in Nigeria and was associated with defendant ALEXANDER.

2. From at least in and around April 2016 and continuing thereafter to at least in and around May 2020, in the District of New Jersey and elsewhere, defendants

MARTINS INALEGWU,
STEINCY MATHIEU, and
MOSES CHUKWUEBUKA ALEXANDER

conspired and agreed with each other and other individuals known and unknown to the grand jury, that is, to:

- a. knowingly and with the intent to defraud, devise and intend to devise a scheme to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, by means of taking or receiving such matter which was delivered by private or commercial interstate carrier at the place at which it is directed to be delivered by the person to whom it is addressed, contrary to Title 18, United States Code, Section 1341; and
- b. knowingly and with intent to defraud, devise and intended to devise a scheme to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations

and promises, and for the purpose of executing such scheme to defraud, did transmit and cause to be transmitted by means of wire communications in interstate 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 the defendants INALEGWU, MATHIEU, and ALEXANDER, and co-conspirators known and unknown to the grand jury, to unlawfully enrich themselves by causing individuals to send money to defendants INALEGWU and MATHIEU, and others, by way of various internet fraud schemes, including romance scams and apartment rental scams. Defendants INALEGWU, MATHIEU and others then laundered those proceeds through various bank accounts and money transmitting business 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 and mail fraud scheme, and distribute proceeds from the scheme to themselves, defendant ALEXANDER and other co-conspirators in Nigeria and elsewhere.

MANNER AND MEANS

4. It was part of the conspiracy that co-conspirators conducted romance scams by using electronic messages sent via email, text messaging, or online platforms, including dating websites that deluded the victims, many of whom were vulnerable, older men and women who lived alone, into believing that the victim

was in a romantic relationship with a person, when instead the person was actually a fake identity assumed by the co-conspirators.

5. It was further part of the conspiracy that the co-conspirators created numerous email accounts and phone numbers, which they used to communicate with victims, initially to further the illusion of the romantic relationship, or other fictitious relationship, and later, to ask for money from the victims, and to provide the victims with instructions on how to wire or mail the money, including recipient names, addresses, financial institutions, and account numbers.

6. It was further part of the conspiracy that once the co-conspirators had gained the trust of the victims by using the fake identity, they used false pretenses, such as the promise of being paid back, or receiving a portion of an investment to cause the victims to mail checks, transfer, deposit or wire money to bank accounts that the victims believed were controlled by their romantic interests, when in fact the bank accounts were controlled by defendants INALEGWU, MATHIEU and others.

7. It was further part of the conspiracy that co-conspirators were also involved in apartment rental scams. In this scenario, co-conspirators advertised apartments for rent over online platforms, including Craigslist. Co-conspirators then deceived victims into believing that they owned or controlled these apartments and directed victims to deposit money they intended as security deposits and application fees into the account of individuals they believed to be landlords. Instead, their money was deposited into accounts controlled by defendants MATHIEU and INALEGWU.

8. It was part of the conspiracy that defendants INALEGWU and MATHIEU received victim monies by various means, including:
- a. Wire transfers into bank accounts held by defendants INALEGWU and/or MATHIEU, including in the name of the registered business, Inalsbech, owned by defendant INALEGWU, and Inalsbech, LLC, owned by defendants INALEGWU and MATHIEU;
 - b. Money orders, personal checks and/or cashier's checks mailed to the defendants INALEGWU and/or MATHIEU at their New Jersey residence;
 - c. Cash deposits directly into accounts held by defendants INALEGWU and/or MATHIEU, and cash mailed directly to the defendants INALEGWU and MATHIEU residence in New Jersey.
 - d. Money Transfers to the defendants INALEGWU and/or MATHIEU via various money transmitting business accounts.

9. It was further part of the conspiracy that the victim monies were deposited into New Jersey based bank accounts in the names of INALEGWU and MATHIEU. Victim money was also deposited into New Jersey based bank accounts in the name of Inalsbech and Inalsbech, LLC, believed to be shell companies owned by defendants INALEGWU and/or MATHIEU, in order to avoid detection and to obscure the true nature of the funds.

10. It was further part of the conspiracy that defendants INALEGWU and MATHIEU then sent a majority of the victim money to defendant ALEXANDER and other co-conspirators. As such, defendants INALEGWU and MATHIEU

insulated defendant ALEXANDER and other co-conspirators living in Nigeria from direct financial transactions with victims.

11. It was further part of the conspiracy that defendants MATHIEU, INALEGWU, and ALEXANDER, and their 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, for the alleged use of the victims and their phony romantic or investment interests. Rather, the co-conspirators used the monies to continue the fraudulent scheme, and also to enrich themselves.

12. It was further part of the conspiracy that defendants MATHIEU and INALEGWU and their 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 defendants MATHIEU and INALEGWU, by wiring, and causing to be wired, the fraudulently obtained monies to other domestic and foreign bank accounts, including to foreign bank accounts controlled by defendants INALEGWU and ALEXANDER and other co-conspirators, and by wiring, and causing to be wired, the fraudulently obtained monies through money transmitting business accounts held in the name of co-conspirators.

13. It was further part of the conspiracy that defendants INALEGWU and MATHIEU maintained, used and/or controlled, at various times, 38 bank accounts at 11 different banking institutions and 10 money service business accounts with eight different money service businesses. The accounts were used to both accept victim money and send victim money out of the country. Several of these accounts

were merely nominee bank accounts, held in the name “Inalsbech” or “Inalsbech LLC,” which as described above, are fictitious companies with no record of business activity. This multitude of accounts, and use of nominee accounts, furthered the scheme described herein as it permitted the quick transfer of money between accounts and to other co-conspirators, and served to insulate the defendants from the fraudulent activity.

14. It was further part of the conspiracy that of the total accounts, defendants INALEGWU and MATHIEU maintained, used, and/or controlled 24 different bank accounts and six money service business accounts to transfer victim monies out of the country and to other co-conspirators, including defendant ALEXANDER and others.

15. It was further part of the conspiracy that defendant INALEGWU also sent monies from the fraudulent scheme to defendant ALEXANDER and others via defendant FATOLU and her unlawful money transfer service. Between 2017 and 2020, defendant INALEGWU used defendant FATOLU’s service to transfer approximately \$209,000 of victim funds located in the United States to accounts located outside of the United States.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy and to affect its objects, defendants MARTINS INALEGWU, STEINCY MATHIEU, and MOSES CHUKWUEBUKA ALEXANDER and their co-conspirators, both known and unknown, committed the following acts, among others, in the District of New Jersey and elsewhere:

16. One or more conspirators using the name “George Marek,” met romance scam victim “B.J.” on Match.com, and caused B.J. to send money to accounts held by defendant MATHIEU. Among other transfers, between October 12, 2016 and May 2, 2017, B.J. sent three wire transfers, one for \$8,000 into an account held by defendant INALEGWU and two in the amount of \$9,500 each, to an account held by defendant MATHIEU, for a total of \$27,000.

17. One or more of the conspirators learned through the course of their fictitious relationship that B.J. was employed as the Director of Finance for an entity, victim N.K.C.V.B. At the request of the romance scam conspirator, B.J., caused victim N.K.C.V.B. to send money to accounts held by defendant MATHIEU and other co-conspirators. Between May 22, 2017 and September 18, 2018, B.J. mailed 29 checks from multiple N.K.C.V.B. bank accounts to defendants MATHIEU and INELAGWU’s New Jersey residence, totaling \$2.8 million dollars. Defendants MATHIEU and/or INALEGWU deposited the total \$2.8 million dollars into accounts held by defendant MATHIEU.

18. One or more conspirators using the name “James Bud,” met romance scam victim “E.Su.” through the online application, Words with Friends, and began communicating with E.Su. through the application, and then ultimately email and text messaging. After communicating with E. Su for several months, the co-conspirator caused E.Su. to send money to accounts held by defendant MATHIEU. Between on or about November 10, 2017 and on or about November 15, 2017, E.Su. sent two wire transfers for a total of \$53,340.60 into an account held by defendant MATHIEU.

19. One or more conspirators using the name “Jimmy Lorenzo,” met romance scam victim “E.Sa.” on an online dating website and caused E.Sa. to send money to accounts held by defendant MATHIEU. Among other transfers, on or about April 25, 2018, E.Sa. transferred \$100,000 into an account held by defendant MATHIEU.

20. One or more conspirators posed as an individual “Robert Smith,” who purported to be an apartment complex manager in the Boston, Massachusetts area. Victim C.G. communicated with Robert Smith about renting an apartment. Smith directed C.G. to wire \$4,050, which represented the first month’s rent and security deposit, to a TD Bank account held by defendant MATHIEU. C.G. believed that defendant MATHIEU was the apartment’s landlord. On or about September 28, 2018, C.G. wired \$4,050 into a TD Bank account held by defendant MATHIEU.

21. One or more conspirators, using the name “Richard Martens,” met romance scam victim “L.P.” on Christian Mingle, an online dating website, and caused L.P. to send money to an account held by defendant MATHIEU. Among other transfers, on or about October 12, 2018, L.P. transferred \$12,000 into a TD account held by defendant MATHIEU.

22. One or more conspirators posed as an individual named “Franklin,” a property manager of an apartment in Boston, Massachusetts; Victim “K.Z.” expressed interest in renting the apartment. “Franklin” directed K.Z. to wire \$10,000 to defendant INALEGWU’s account, which K.Z. believed belonged to the apartment’s landlord. On or about June 14, 2019, K.Z. wired \$10,098 to defendant INALEGWU’s M&T bank account.

23. One or more conspirators, using the name “Norbert Dossier,” met romance scam victim “V.R.” on silversingles.com, an online dating website, and caused V.R. to send money to accounts associated with defendant INALEGWU. Among other transfers, on or about June 27, 2019, V.R. wired \$47,000 into a JP Morgan Chase bank account held by defendant INALEGWU.

24. One or more conspirators, using the name “Thomas Lee,” met romance scam victim “E.P.” on an online dating website, and caused E.P. to send money to accounts associated with defendant INALEGWU. Among other transfers, on or about December 4, 2019, E.P. wired \$41,000 into a JP Morgan Chase bank account in the name of Inalsbech LLC which was held by defendant INALEGWU.

25. One or more conspirators, using the name “Sylvia Loops,” met romance scam victim “A.M.” on silversingles.com, an online dating website, and caused A.M. to send money to accounts associated with defendant INALEGWU. Between on or about March 23, 2020 and March 24, 2020, A.M. sent two wire transfers totaling \$54,400 to an account in the company name Inalsbech, LLC, which was an account held by defendant INALEGWU.

26. One or more conspirators, masquerading as “Keanu Reeves,” met romance scam victim “T.C.” on Twitter, an online social media platform, and caused T.C. to send money to a number of co-conspirator accounts, including accounts associated with defendant INALEGWU. Between on or about March 31, 2020 and May 11, 2020, T.C. sent two wire transfers totaling \$28,500 to a bank account in the company name Inalsbech, LLC, which was an account held by defendant

INALEGWU, and one wire transfer of \$25,000 to an account held by defendant INALEGWU.

27. At the direction of coconspirators, T.C. also mailed checks to locations as specified by the co-conspirator with whom T.C. was communicating. Between April 13, 2020 and April 27, 2020, T.C. mailed two checks to defendants INALEGWU and MATHIEU's address – one for \$11,000 and one for \$80,000. Those checks were deposited into an Inalsbech, LLC bank account, wherein defendant INALEGWU was the account holder.

28. One or more conspirators, purporting to be a female, with name unknown, met romance scam victim "D.S." and caused D.S. to send money to accounts associated with defendant INALEGWU. Between on or about July 26, 2019, and July 29, 2019, D.S. mailed a \$60,000 cashier's check payable to Inalsbech, LLC at the New Jersey residence of defendants INALEGWU and MATHIEU. While defendant INALEGWU was in Nigeria, defendant MATHIEU endorsed the check on behalf of defendant INALEGWU and deposited the \$60,000 into an Inalsbech, LLC bank account.

29. One or more conspirators, using the name "Jeremy Hendricks," met romance scam victim A.G. and caused A.G. to send money to accounts associated with defendant INALEGWU. Between on or about October 8, 2019, and October 9, 2019, A.G. mailed a \$11,000 personal check payable to Inalsbech, LLC at the New Jersey residence of defendants INALEGWU and MATHIEU. This check deposited into an Inalsbech, LLC bank account.

30. One or more conspirators, using the name “Chris Burke,” met romance scam victim M.N. and caused M.N. to send money to accounts associated with defendant INALEGWU. Between on or about April 22, 2020, and May 19, 2020, M.N. mailed two cashier’s checks payable to Inalsbech, LLC at the New Jersey residence of defendant INALEGWU and MATHIEU – one for \$10,000 and one for \$20,000. This full \$30,000 was then deposited into an Inalsbech, LLC bank account.

31. Defendants INALEGWU and ALEXANDER communicated about the status of victim money and when it would be deposited and transferred. For example, on April 24, 2020, defendant ALEXANDER asked defendant INALEGWU why he had not yet deposited “10k,” referring to the \$10,000 check sent by victim M.N., discussed above. Defendant INALEGWU responded not “till the 80k clear,” referring to the \$80,000 victim T.C. sent, which was deposited and later credited to defendant INALEGWU’s account on April 27, 2020. Defendant ALEXANDER then said, “Please snap it and send to me let show the guy it has not been deposited.” Thereafter, defendant INALEGWU sent defendant ALEXANDER a picture of the \$10,000 cashier’s check sent by M.N. This \$10,000 check was later deposited and credited to defendant INALEWU’s Inalsbech account on April 29, 2020.

32. One or more conspirators, using the name “Jack Choo,” met romance scam victim “M.S.” on Match.com, an online dating website, and caused M.S. to send money to accounts associated with defendant INALEGWU. Between on or about March 30, 2020 and April 20, 2020, M.S. mailed five cashier’s checks payable to Inalsbech, LLC to the New Jersey residence of defendants INALEGWU and

MATHIEU totaling \$26,000. This full \$26,000 was then deposited into an Inalsbech, LLC bank account.

33. Defendant INALEGWU communicated directly with defendant ALEXANDER about the ongoing internet frauds and the method by which he obtained payment. On or about May 8, 2020, defendant INALEGWU sent defendant ALEXANDER a Whatsapp message which said, “No wire transfer should go to my aza. Just cashier check pls.” (The term “aza” is believed to be Nigerian slang for bank account). On or about May 13, 2020, defendant INALEGWU sent defendant ALEXANDER a voice message wherein he explained that he only wants to receive money by cash or checks because traces of a wire last for “eternity.”

34. Between 2016 and 2020, defendants INALEGWU and MATHIEU received approximately \$4.5 million from more than 100 victims throughout the United States into their various bank accounts, described above. Of this total, defendants INALEGWU and MATHIEU accepted approximately \$900,000 in wire transfers, \$2.94 million in checks received through private or commercial interstate carriers, and an additional \$690,000 in either cash or other funds which were deposited directly into the defendants INALEGWU’s and MATHIEU’S accounts.

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

COUNTS 2 to 9

(Wire Fraud)

1. Paragraphs 1 and 3 through 34 of Count 1 of this Indictment are realleged as if set forth in full herein.

2. On or about the dates listed below, in the District of New Jersey or elsewhere, defendants

MARTINS INALEGWU and
STEINCY MATHIEU

did knowingly and intentionally devise and intend 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 aid and abet the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and, for purposes of executing and attempting to execute such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, each transmission constituting a separate count:

| COUNT | APPROXIMATE DATE | DEFENDANT | DESCRIPTION OF TRANSACTION | VALUE |
|-------|------------------|----------------------|---|-----------|
| 2 | 4/25/18 | MATHIEU | Victim E.Sa. transferred funds from the District of Columbia into a Wells Fargo account ending in 6673, held by MATHIEU in New Jersey | \$100,000 |
| 3 | 9/28/18 | INALEGWU and MATHIEU | Victim C.G. wired funds from Massachusetts into a TD Bank account ending in 8157, held by | \$4,050 |

| | | | | |
|---|----------|----------------------|---|----------|
| | | | INALEGWU and MATHIEU in New Jersey | |
| 4 | 10/12/18 | INALEGWU and MATHIEU | Victim L.P. wired funds from Florida into a TD Bank account ending in 8157, held by INALEGWU and MATHIEU in New Jersey | \$12,000 |
| 5 | 6/14/19 | INALEGWU | Victim K.Z. wired funds from China into M&T Bank account ending in 2493, held by INALEGWU in New Jersey | \$10,098 |
| 6 | 6/27/19 | INALEGWU | Victim V.R. wired funds from Kansas into JPMC bank account ending in 3895, in the name of INALEGWU in New Jersey | \$47,000 |
| 7 | 12/4/19 | INALEGWU | Victim E.P. wired funds from Hawaii into JPMC bank account ending in 2551, in the name of INALEGWU in New Jersey | \$41,000 |
| 8 | 3/23/20 | INALEGWU | Victim A.M. wired funds from Idaho into a Republic Bank account ending in 1230, in the name of INALSBECH, LLC, held by INALEGWU in New Jersey | \$38,400 |
| 9 | 3/24/20 | INALEGWU | Victim A.M. wired funds from Idaho into a Republic Bank account ending in 1230, in the name of INALSBECH, LLC, held by INALEGWU in New Jersey | \$16,000 |

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

COUNTS 10 to 15

(Mail Fraud)

1. Paragraph 1 and 3 through 34 of Count 1 this Indictment are realleged as if set forth in full herein.

2. On or about the dates listed below, each instance constituting a separate count, in the District of New Jersey or elsewhere, defendants

**MARTINS INALEGWU and
STEINCY MATHIEU**

having devised and intending to devise the scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and aid and abet the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, did knowingly cause to be deposited in a post office and authorized depository for mail to be delivered by the United States Postal Service and any private or commercial carrier certain mail matter, for the purpose of executing such scheme and artifice, each mailing representing a separate count:

| COUNT | APPROXIMATE DATE | DESCRIPTION OF SHIPMENT | VALUE |
|--------------|-----------------------------|---|--------------|
| 10 | Between 4/4/18 and 4/10/18 | Victim N.K.C.V.B. in Kentucky mailed a check payable to MATHIEU to the INALEGWU and MATHIEU residence in New Jersey; check was deposited into a BB&T account ending in 5184 and held in the name of MATHIEU | \$90,300 |
| 11 | Between 7/26/19 and 7/29/19 | Victim D.S.in North Carolina mailed a check payable to INALSBECH, LLC to the INALEGWU and MATHIEU residence in New Jersey; check was deposited into a BB&T bank account in | \$60,000 |

| | | | |
|----|-----------------------------|--|----------|
| | | the name of Inalsbech, LLC, but held by INALEGWU | |
| 12 | Between 10/8/19 and 10/9/19 | Victim A.G. in Florida mailed a check payable to INALSBECH, LLC, to the INALEGWU and MATHIEU residence in New Jersey; this check was deposited into a JPMC account ending in 2551 and held in the name of INALEGWU. | \$11,000 |
| 13 | Between 4/22/20 and 4/27/20 | Victim T.C. in Illinois mailed a check payable to INALSBECH, LLC at the MATHIEU and INALEGWU residence in New Jersey; check was deposited into a Republic Bank account ending in 1230 and held in the name of INALEGWU | \$80,000 |
| 14 | Between 5/16/20 and 5/19/20 | Victim M.N. in Oklahoma mailed a check payable to INALSBECH, LLC at the MATHIEU and INALEGWU residence in New Jersey; check was deposited into a Republic Bank account ending in 1230 and held in the name of INALEGWU | \$20,000 |
| 15 | Between 3/27/20 and 3/30/20 | Victim M.S. in Hawaii mailed a check payable to INALSBECH, LLC at the MATHIEU and INALEGWU residence in New Jersey; check was deposited into a Republic Bank account ending in 1230 and held in the name of INALEGWU | \$3,000 |

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNT 16
(Conspiracy to Commit Money Laundering)

1. Paragraphs 1 and 3 through 34 of Count 1 of this Indictment are realleged as if set forth in full herein.

THE CONSPIRACY

2. From in and around April 2016 and continuing thereafter until June 2020, in the District of New Jersey and elsewhere, defendants

MARTINS INALEGWU,
STEINCY MATHIEU, and
MOSES CHUKWUEBUKA ALEXANDER

did knowingly and intentionally combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to:

a. knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, namely, mail fraud, in violation of Title 18, United States Code, Section 1341, and wire fraud, in violation of Title 18, United States Code, Section 1343: (1) knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, or the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i); and (2) to transport, transmit, and transfer, and attempt to transport,

transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(2)(B)(i).

b. knowingly engage and attempt to engage in monetary transactions namely, deposits, withdrawals, transfers and exchanges of U.S. currency and monetary instruments, through a financial institution, 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, namely, mail fraud, in violation of Title 18, United States Code, Section 1341, and wire fraud, in violation of Title 18, United States Code, Section 1343, contrary to Title 18, United States Code, Section 1957.

OBJECT OF THE CONSPIRACY

3. The goal of the conspiracy was for INALEGWU, MATHIEU and ALEXANDER, and others to conduct financial transactions involving money obtained from the victims of the Internet scams alleged in this Indictment, in order to conceal and disguise the nature, location, source, ownership and control of the money.

MANNER AND MEANS

4. It was part of the conspiracy that defendants INALEGWU and MATHIEU created businesses – Inalsbech and Inalsbech, LLC – to assist in

carrying out their fraudulent scheme. Inalsbech purported to be “lessors of other real estate property” and “sell, develop and manage property for others,” and Inalsbech, LLC, claimed that it “buys and sells home, rents out homes and flipping houses.” In fact, there is no record of actual business activity, income and/or expenses for either of these companies, and accounts held in these name solely accepted fraud proceeds. These companies were used solely to conceal and disguise the nature, location, source, ownership and control of the fraud proceeds.

5. It was further part of the conspiracy that defendants MATHIEU and INALEGWU would withdraw fraud proceeds from accounts under their control, transfer fraud proceeds to other accounts in their control, or transfer money out of the country, including to co-conspirators, by way of money transmitting business accounts or wire transfer.

6. It was further part of the conspiracy that defendant INALEGWU used the unlawful money transfer service provided by defendant FATOLU to transfer victim funds to conspirators outside of the United States. Defendant FATOLU operated an unlawful money transfer service that moved funds from the United States to foreign bank accounts through a “hawala system.” In the hawala system, funds are transferred by customers to a hawala operator/participant in the United States, and corresponding funds, less any fees, are disbursed to recipients in another country by associates in that location or individuals maintaining accounts in that location. This type of banking leaves little, if any, financial trail. Accordingly, by moving money through defendant FATOLU in this system,

defendant INALEGWU could further disguise the nature, source and control of the victim funds.

7. As part of the conspiracy, between 2016 and 2020, defendants INALEGWU and MATHIEU moved approximately \$3.7 million of the \$4.5 million of victim money out of the accounts that they owned and/or controlled in the United States and out of the country. Approximately \$186,000 was moved out of the United States and directly to accounts in Nigeria controlled by defendant INALEGWU. Approximately \$77,000 was moved out of the United States and into an account held in the name of defendant INALEGWU's mother.

8. It was further part of the conspiracy that between 2016 and 2020, defendants INALEGWU and MATHIEU sent approximately \$2.5 million of victim money to defendant ALEXANDER by wire transfer and money transfer service accounts to multiple Nigerian and Turkish bank accounts held in his name and that of his business, Morocho Nigeria Ltd.

9. It was further part of the conspiracy that between 2016 and 2020, defendants MATHIEU and INALEGWU sent approximately \$840,000 in victim money to other known co-conspirators by wire transfer and money transfer service accounts to accounts in Nigeria and Turkey. During this same time period, defendants MATHIEU and INALEGWU sent the remaining approximately \$100,000 in victim money to friends, family, and other unknown co-conspirators.

10. It was further part of the conspiracy that between 2016 and 2020, defendants INALEGWU and MATHIEU had little to no income, aside from the victim monies they accepted. INALEGWU and MATHIEU spent at least \$213,000

more than their reported income on personal expenditures, including but not limited to rent, automobiles, food and alcohol, entertainment, travel, shopping jewelry, and plastic surgery.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy and to affect its objects, defendants MARTINS INALEGWU, STEINCY MATHIEU, and MOSES CHUKWUEBUKA ALEXANDER and their co-conspirators, both known and unknown, committed the following acts, among others, in the District of New Jersey and elsewhere:

11. On or about October 12, 2016, victim B.J. wired \$8,000 to a Bank of America account held by defendant INALEGWU. On that same day, defendant INALEGWU transferred \$2,000 from New Jersey to a known co-conspirator located in Turkey using money transfer service MoneyGram. The next day, October 13, 2016, INALEGWU sent two additional \$2,000 transfers from New Jersey to co-conspirators in Turkey using transfer service MoneyGram.

12. Between April 13, 2017 and April 14, 2017, victim B.J. sent two separate \$9,500 wires to defendant MATHIEU's Bank of America account. On April 14, 2017, defendant MATHIEU wired \$16,650 from New Jersey to a known conspirator in Turkey.

13. On or about October 10, 2017, victim N.K.C.V.B. sent a \$90,000 check to defendants MATHIEU and INALEGWU's residence, which was deposited into defendant MATHIEU's Bank of America account in New Jersey. On or about October 11, 2017, defendant MATHIEU wired \$20,000 to defendant INALEGWU's

Wells Fargo account. On that same day, defendant MATHIEU wired \$80,000 from New Jersey to a known conspirator in Turkey.

14. On or about December 10, 2017, victim N.K.C.V.B. send a \$70,000 check to the defendants INALEGWU and MATHIEU residence in New Jersey, which was deposited into defendants INALEGWU and MATHIEU's joint TD Bank account in New Jersey. On January 2, 2018, \$40,000 was wired out of that same joint account and to a Nigerian account held in the name of defendant ALEXANDER's company, Morochi Nigeria Ltd. On January 8, 2018, \$17,500 was wired out of that same joint account and to a Nigerian account held in the name of defendant ALEXANDER's company, Morochi Nigeria Ltd.

15. On or about April 10, 2018, victim N.K.C.V.B. sent a \$90,300 check to defendants INALEGWU and MATHIEU's residence which was deposited into defendants INALEGWU and MATHIEU's joint TD Bank Account in New Jersey. On or about this same day, victim P.M. sent a \$40,000 check to defendants INALEGWU and MATHIEU residence, which was deposited into defendant INALEGWU's TD Bank account in New Jersey. On April 19, 2019, two wires were sent out of their joint TD Bank account – one for \$60,000 and one for \$50,000 – which both were sent to a Nigerian account held in the name of defendant ALEXANDER's company, Morochi Nigeria Ltd.

16. On or about April 25, 2018, victim E.Sa. transferred \$100,000 into defendant MATHIEU's Wells Fargo account. On April 26, 2018, defendant MATHIEU wired \$5,500 from New Jersey to defendant INALEGWU's personal

account in Nigeria, and also wired \$58,500 to a Nigerian account in the name of Morochi Nigeria Ltd., the company associated with defendant ALEXANDER.

17. On or about September 28, 2018, victim C.G. wired \$4,050 into defendants INALEGWU and MATHIEU's joint TD Bank account in New Jersey. On October 1, 2018, a TD Bank Account in the name of Inalsbech transferred \$3,923.99 from New Jersey to defendant ALEXANDER's Nigerian bank account, using money transfer service, WorldRemit.

18. On or about June 14, 2019, victim Z.K. wired \$10,098 to defendant INALEGWU's M&T account in New Jersey. On this same day, defendant INALEGWU transferred \$9,300 from that account to his BB&T account in the name of Inalsbech, LLC, another account held by defendant INALEGWU.

19. On or about July 29, 2019, victim D.S. mailed a \$60,000 check to the defendants INALEGWU and MATHIEU's residence, which was deposited into Inalsbech's BB&T account. On August 8, 2019, defendant INALEGWU wrote a check from the same Inalsbech BB&T account for \$56,000, which he deposited into his personal JPMC account in New Jersey.

20. On or about December 4, 2019, victim E.P. wired \$41,000 to the JPMC account in the name of defendant INALEGWU's company, Inalsbech. On this same day, defendant INALEGWU wired \$19,960 from this same account in New Jersey to the Nigerian account of defendant ALEXANDER's company, Morochi Nigeria Ltd.

21. On or about February 19, 2020, victim S.R. wired \$6,100 to a Citizen's Bank account in the name of defendant INALEGWU's company, Inalsbech. On February 20, 2020 defendant INALEGWU exchanges text messages with defendant

FATOLU, indicating that he needs two million naira, the Nigerian currency, which is approximately equivalent to \$5,000 US dollars. On or about February 24, 2020, defendant INALEGWU deposits \$5,400 into defendant FATOLU's TD Bank business account in the name of Perfect Touch. Defendant INALEGWU then directed defendant FATOLU to deposit the corresponding naira into the Nigerian bank account of ALEXANDER's company, Morochi Nigeria Ltd, which she did.

22. On or about March 23, 2020, victim A.M. wired \$38,400 to Inalsbech's account at Republic Bank. On the same day, defendant INALEGWU sent \$238.29, using money transfer service Wave, from New Jersey to his mother in Nigeria.

23. On or about March 31, 2020, victim T.C. wired \$20,000 to defendant INALEGWU's Republic Bank account. On this same day defendant INALEGWU transferred \$10,000 from this same Republic Bank account in New Jersey into the Inalsbech Republic Bank account.

24. On or about April 13, 2020, victim T.C. mailed a \$11,000 check to defendants INALEGWU and MATHIEU's residence, which was deposited in the Inalsbech Republic account. On the same day, defendant INALEGWU sent five different money transfers to different individuals from that account, including \$401.07, to his mother in Nigeria using money transfer service Wave.

25. On or about April 29, 2020, victim M.N. sent a \$10,000 check to defendants MATHIEU and INALEGWU's residence, which was deposited into an Inalsbech Republic Bank account. The next day, defendant INALEGWU transferred \$10,000 from that same Inalsbech account into his personal Republic Bank account.

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

COUNTS 17 to 20

(Concealment Money Laundering)

1. Paragraphs 1 and 3 through 35 of Count 1, and paragraphs 3 through 25 of Count 16 of this Indictment are realleged as if set forth in full herein.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendants

MARTINS INALEGWU,
 STEINCY MATHIEU, and
 MOSES CHUKWUEBUKA ALEXANDER

did knowingly conduct and attempt to conduct the following financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Section 1341 and wire fraud, in violation of Title 18, United States Code, Section 1343, 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 said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, as set forth more fully below, each such transaction constituting a separate count of this Indictment:

| COUNT | APPROXIMATE DATE | DEFENDANT | DESCRIPTION OF TRANSFER | VALUE |
|-------|------------------|-----------|---|---------|
| 17 | 6/14/19 | INALEGWU | INALEGWU wrote a check from his M&T Bank account ending in 2493 payable to "Inalsbech, LLC," and deposited the funds into the BB&T account ending in xxxx | \$9,300 |

| | | | | |
|----|---------|----------|--|----------|
| | | | in the name of Inalsbech, LLC, and held by INALEGWU | |
| 18 | 8/8/19 | INALEGWU | INALEGWU wrote a check from his BB&T account ending in 0008 payable to "Inalsbech, LLC," and deposited the funds into his personal JPMC account ending in 3895 | \$56,000 |
| 19 | 3/31/20 | INALEGWU | INALEGWU transferred victim funds from the Inalsbech, LLC Republic Bank account ending in 1230 to his Republic Bank account ending in 0951. | \$10,000 |
| 20 | 4/30/20 | INALEGWU | INALEGWU transferred victim funds from his Republic Bank account ending in 0951 to the Inalsbech, LLC Republic Bank account ending in 1230 | \$10,000 |

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), and Section 2.

COUNTS 21 and 22
 (Foreign Concealment Money Laundering)

1. Paragraphs 1 and 3 through 35 of Count 1, and paragraphs 3 through 25 of Count 16 of this Indictment are realleged as if set forth in full herein.

2. On the dates listed below, in the District of New Jersey, and elsewhere, defendants

MARTINS INALEGWU,
 STEINCY MATHIEU, and
 MOSES CHUKWUEBUKA ALEXANDER

knowingly transported, transmitted, transferred, attempted to transport, transmit, transfer funds and aided and abetted and willfully caused, the transmission and transferring of, a monetary instrument and funds, from a place in the United States to a place outside the United States, that is, Nigeria, knowing that the funds involved in the transfer represented the proceeds of some form of some form of unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Section 1341 and wire fraud, in violation of Title 18, United States Code, Section 1343, and knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, or the control of the proceeds of the specified unlawful activity as set forth more fully below, each such transaction constituting a separate count of this Indictment:

| COUNT | APPROXIMATE DATE | DEFENDANT | DESCRIPTION OF TRANSFER | VALUE |
|-------|------------------|----------------------|---|---------|
| 21 | 4/26/18 | INALEGWU and MATHIEU | INALEGWU and MATHIEU wired victim funds from their joint TD Bank account ending in 8157 to INALEGWU's personal account in Nigeria | \$5,500 |

| | | | | |
|----|---------|------------------------------|--|------------|
| 22 | 10/1/18 | INALEGWU and ALEXANDER | INALEGWU transferred victim funds from his TD Bank account ending in 2617 to ALEXANDER in Nigeria, by way of money transmitting business Worldremit. | \$3,929.99 |
|----|---------|------------------------------|--|------------|

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

COUNTS 23 to 26
 (Transacting in Criminal Proceeds)

1. Paragraphs 1 and 3 through 35 of Count 1, and paragraphs 3 through 25 of Count 16 of this Indictment are realleged as if set forth in full herein.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendants

MARTINS INALEGWU,
 STEINCY MATHIEU, and
 MOSES CHUKWUEBUKA ALEXANDER

Did knowingly engage and attempt to engage in monetary transactions, namely, deposits, withdrawals, transfers, and exchanges of U.S. currency and monetary instruments, through financial institutions affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, derived from a specified unlawful activity, namely – that is, wire and mail fraud, as set forth more fully below, each such transaction constituting a separate count of this Indictment:

| COUNT | APPROXIMATE DATE | DEFENDANT | DESCRIPTION OF TRANSFER | VALUE |
|-------|------------------|---|--|----------|
| 23 | 4/19/18 | INALEGWU, MATHIEU, and ALEXANDER | INALEGWU and MATHIEU wired victim funds from their joint TD Bank account ending in 8157 in New Jersey to an account held in the name “Morochi Nigeria Limited,” a company associated with ALEXANDER in Nigeria | \$60,000 |

| | | | | |
|----|---------|---|---|----------|
| 24 | 4/19/18 | INALEGWU, MATHIEU, and ALEXANDER | INALEGWU and MATHIEU wired victim funds from their joint TD Bank account ending in 8157 in New Jersey to an account held in the name "Morochi Nigeria Limited," a company associated with ALEXANDER in Nigeria | \$50,000 |
| 25 | 4/26/18 | INALEGWU, MATHIEU, and ALEXANDER | INALEGWU and MATHIEU wired victim funds from their joint TD Bank account ending in 8157 in New Jersey to an account held in the name "Morochi Nigeria Limited," a company associated with ALEXANDER in Nigeria | \$58,500 |
| 26 | 12/4/19 | INALEGWU and ALEXANDER | INALEGWU wired victim funds from his JPMC bank account ending in 2551 in New Jersey to an account held in the name "Morochi Nigeria Limited," a company associated with ALEXANDER in Nigeria | \$19,960 |

In violation of Title 18, United States Code, Sections 1957 and Section 2.

COUNT 27

(26 U.S.C. § 7201 – Income Tax Evasion)

1. Paragraphs 1 and 3 through 34 of Count 1 of this Indictment are realleged as if set forth in full herein.

2. The Internal Revenue Service (“IRS”) was a constituent agency of the Treasury Department and part of the Executive Branch of the Government. The IRS was responsible for administering and enforcing the tax laws of the United States, collecting taxes owed by its citizens and businesses to the Treasury of the United States, and providing refunds of overpaid taxes.

3. Generally, individuals were required by law to prepare and file income tax returns with the IRS by April 15 of the year following the year when the income was earned unless an extension was granted. If those income tax returns show that income taxes were due and owing, then the taxpayer was obligated by law to pay that sum of money to the IRS.

4. During tax year 2017, the Internal Revenue Code required taxpayers, including defendants INALEGWU and MATHIEU, to file an individual income tax return with the Internal Revenue Service (“IRS”), which is charged with collecting payments of taxes due and owing to the United States. During that period, the Internal Revenue Code required defendants INALEGWU and MATHIEU to report accurately all resulting income on their individual income tax returns.

5. During the tax year 2017, defendants INALEGWU and MATHIEU obtained funds from victims of both the romance scam and apartment rental scam of approximately \$1,165,001.12.

6. Upon that income, there was owing to the United States an income tax of approximately \$446,647 by defendants INALEGWU and MATHIEU.

7. Neither defendant INALEGWU nor defendant MATHIEU filed a tax return for tax year 2017, and therefore failed entirely to report this money to the IRS.

8. Instead, both defendants INALEGWU and MATHIEU used various bank accounts in the United States to obtain the victim money, transfer the victim money between accounts, transfer the money to accounts in Nigeria, and launder the victim monies to other co-conspirators in Turkey and Nigeria and used victim monies to pay personal expenses.

9. Both defendants INALEGWU and MATHIEU used money transmitting businesses, including both Western Union and MoneyGram, to both accept victim money and transfer victim money out of the country.

10. Both defendants INALEGWU and MATHIEU withdrew money in cash from the various bank accounts, in their own names and that of their fictitious businesses, that they owned, controlled and used to receive proceeds from victims, and used such cash to pay personal expenses, including but not limited to rent, automobiles, food and alcohol, entertainment, travel, and shopping.

11. By not filing a return for tax year 2017, and being involved in laundering the proceeds from the mail and wire fraud scheme, defendants INALEGWU and MATHIEU willfully evaded the payment of income taxes due and owing on the money that they unlawfully obtained.

12. As a result of defendants INALEGWU and MATHIEU's willful attempts to evade and defeat the payment of income taxes due and owing,

defendant INALEGWU and MATHIEU failed to report their taxable income for tax year 2017, causing an aggregate tax due and owing to the United States of approximately \$446,647.

13. On or about April 15, 2018, in Burlington County, in the District of New Jersey and elsewhere, defendants,

MARTINS INALEGWU and
STEINCY MATHIEU

did willfully attempt to evade and defeat a substantial part of the income tax due and owing to the United States, by committing the affirmative acts of tax evasion set forth in paragraph 8 above, thereby concealing and attempting to conceal from the IRS their true and correct income.

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

COUNT 28

(26 U.S.C. § 7201 – Income Tax Evasion)

1. Paragraphs 1 and 3 through 34 of Count 1 and paragraphs 2, 3 and 8 through 10 of Count 27 of this Indictment are realleged as if set forth in full herein.

2. During tax year 2018, defendants INALEGWU and MATHIEU obtained victims funds by way of the romance scam and apartment rental scam in the approximate amount of \$2,036,752.80.

3. Upon that income, there was owing to the United States an income tax in the approximate amount of \$766,383.00 by defendants INALEGWU and MATHIEU.

4. On or about February 19, 2019, defendants INALEGWU and MATHIEU jointly filed, and caused to be filed, with the Internal Revenue Service a Form 1040, U.S. Individual Income Tax Returns for tax year 2018, which tax returns concealed the income described in paragraph 2 above and the table below.

5. During tax year 2018, defendants INALEGWU and MATHIEU engaged in numerous affirmative acts to conceal and attempt to conceal the income described in paragraph 2 above, in order to evade the assessment and payment of a tax, including: (a) using nominee bank accounts at various financial institutions to both accept and launder victim money obtained through the romance and apartment rental scams; and (b) obtaining victim money and performing nominee transactions through various money transmitting business accounts to launder victim money obtained through the romance and apartment rental scams.

6. On or about February 19, 2019, in Burlington County, in the District of New Jersey and elsewhere, defendant

MARTINS INALEGWU and

STEINCY MATHIEU

did willfully attempt to evade and defeat a substantial part of the income tax due and owing to the United States for tax year 2018 by only reporting on Form W-2 wages. Defendants INALEGWU and MATHIEU failed to report money that they received from the victims of the romance and apartment rental scams, which they deposited into bank accounts that they controlled and which were used to pay personal expenses and provide to family members, thereby concealing and attempting to conceal from the IRS their true and correct income. As a result of such additional taxable income, there was additional tax due and owing to the United States.

In violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNTS 29 and 30
(26 U.S.C. § 7201 – Income Tax Evasion)

1. Paragraphs 1 and 3 through 35 of Count 1 and paragraphs 2, 3 and 8 through 10 of Count 27 of this Indictment are realleged as if set forth in full herein.

2. During tax year 2019 and 2020, as listed in the table in paragraph 6 below, defendant INALEGWU obtained victims funds by way of the romance scam and apartment rental scam in the approximate amounts listed in the table below.

3. Upon that income, there was owing to the United States an income tax in the approximate amounts listed in the table below by defendant INALEGWU.

4. On or about the dates listed below, defendant INALEGWU filed, and caused to be filed, with the Internal Revenue Service a Form 1040, U.S. Individual Income Tax Returns for tax years listed in the table below, which tax returns concealed the income described in paragraph 2 above and the table below.

5. During tax years listed below, defendant INALEGWU engaged in numerous affirmative acts to conceal and attempt to conceal the income described in paragraph 2 above and the table below, in order to evade the assessment and payment of a tax, including: (a) using nominee bank accounts at various financial institutions to both accept and launder victim money obtained through the romance and apartment rental scams; and (b) obtaining victim money and performing nominee transactions through various money transmitting business accounts to launder victim money obtained through the romance and apartment rental scams.

6. On or about the dates set forth below, in Burlington County, in the District of New Jersey and elsewhere, defendant

MARTINS INALEGWU

did knowingly and willfully attempt to evade and defeat a substantial part of the income tax due and owing to the United States for tax years set forth below, by committing the affirmative acts of tax evasion set forth in paragraph 5 above, among others, with each such return constituting a separate count of this Indictment:

| Count | Tax Year | Approximate Date Form 1040 Filed | Approximate Undeclared Income | Approximate Tax Due |
|--------------|-----------------|---|--------------------------------------|----------------------------|
| 29 | 2019 | March 6, 2020 | \$890,612.85 | \$335,418 |
| 30 | 2020 | March 21, 2021 | \$428,391.15 | \$152,263 |

In violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNT 31

(Unlicensed Money Transmitting Business)

1. Paragraphs 1 and 3 through 34 of Count 1, and paragraphs 3 through 25 of Count 16 of this Indictment are realleged as if set forth in full herein.

2. At all times relevant to Count 31 of this Indictment:

a. Money transmitting businesses are required by federal law to register with the Secretary of the Treasury of the United States, to file reports of suspicious activity by customers and to report cash transactions in amounts greater than \$10,000, unless specifically exempted by law.

b. The term “money transmitting” includes, among other things, transferring funds through an electronic funds transfer network involving a financial institution in the Federal Reserve system of the United States.

c. As used, an “unlicensed money transmitting business” means a money transmitting business that affects interstate commerce and foreign commerce in any manner and degree and fails to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, or regulations prescribed under that section.

d. The term “unlicensed money transmitting business” was defined in Title 18, United States Code, Section 1960(b)(1)(A) to include any money transmitting business that affected interstate or foreign commerce in any manner or degree and that was operated without an appropriate money transmitting license in a State where such operation was punishable as a misdemeanor or a felony under State law, regardless of whether the operator knew that the operation was required to be licensed or that the operation was so punishable.

e. Under the New Jersey Code of Criminal Justice, a business which, for a fee, received money for the purpose of transmitting it within the United States or to locations abroad, by any means, was required to obtain a license authorizing the operation of a money transmitting business from the State of New Jersey. Specifically, the operation of an unlicensed money transmitting business was punishable as a felony in the State of New Jersey, pursuant to N.J.S.A. 17:15C-4 and 17:15C-24; and

f. Defendant OLUWASEYI FATOLU operated Perfect Touch Unisex Beauty Salon ("Perfect Touch"), located in Irvington, New Jersey.

g. Defendant OLUWASEYI FATOLU also operated multiple, licensed money transmit businesses out of the Perfect Touch business location. Beginning in 2017, defendant FATOLU was an authorized delegate for money transmit business La Nacional. In 2018, defendant FATOLU became an authorized delegate for the money transmit businesses IDT Payment Services Inc., doing business as Boss Revolution and Choice Money Transfer Inc., doing business as Small World Money Transfer. In 2020 defendant FATOLU became an authorized delegate for Western Union, another money transmit business.

h. Outside of her authorizations with the above listed businesses, at Perfect Touch, in the District of New Jersey and elsewhere, defendant OLUWASEYI FATOLU engaged in the business of transmitting funds and receiving funds for transmission, for a fee, from the United States to Nigeria, and elsewhere, on behalf of the public within the meaning of Title 18, United States Code, Section 1960(b)(2).

i. Defendant OLUWASEYI FATOLU has not obtained, either in her own name or in the name of Perfect Touch, a license from the State of New Jersey for the receipt of money from customers for the purpose of transmitting money, or for the actual transmission of the money within the United States or to locations abroad, for a fee.

j. FATOLU operated an unlawful money transfer service that moved funds from the United States to foreign bank accounts through a hawala system. In the hawala system, funds are transferred by customers to a hawala operator/participant in the United States, and corresponding funds, less any fees, are disbursed to recipients in another country by associates in that location or individuals maintaining accounts in that location. This type of banking leaves little, if any, financial trail.

k. Between on or about December 2017 and on or about May 2020, defendant OLUWASEYI FATOLU received money transfers from different individuals across the United States, including MARTINS INALEGWU. OLUWASEYI FATOLU directed customers to deposit money, typically cash, into accounts in the name of Perfect Touch, her spouse, and other known and unknown co-conspirators.

l. After receiving incoming money transfers, defendant OLUWASEYI FATOLU facilitated the transfer of a majority of the money received out of the country and into other accounts, and kept a portion, typically between 1% and 5%, as a commission for completing the transactions.

m. For example, on February 20, 2020, INALEGWU exchanged text messages with defendant FATOLU, indicating that he needed two million naira, the Nigerian currency, which is approximately equivalent to \$5,000 US dollars. On or about February 24, 2020, INALEGWU deposited \$5,400 into defendant FATOLU's TD Bank business account in the name of Perfect Touch. INALEGWU then directed defendant FATOLU to deposit the corresponding naira into the Nigerian bank account of ALEXANDER's company, Morochi Nigeria Ltd, which she did. Records reflect that this additional \$400 represented FATOLU's fee for facilitating the movement of INALEGWU's money from the United States to an account in Nigeria.

3. From in or around December 2017 through in or around May 2020, in the District of New Jersey, and elsewhere, the defendant,

OLUWASEYI FATOLU,

and others known and unknown, knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business, which affected interstate and foreign commerce and which was operated without the appropriate money transmitting license in a State, namely the State of New Jersey, where such operation was punishable as a felony under New Jersey law.

In violation of Title 18, United States Code, Section 1960 and 2.

FORFEITURE ALLEGATION AS TO COUNTS 1 THROUGH 15

1. As a result of committing the offenses charged in Counts 1 through 15 of this Indictment, the defendant charged in each such count shall forfeit to the United States, 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, constituting or derived from proceeds traceable to the offenses alleged in Counts 1 through 15 of this Indictment.

FORFEITURE ALLEGATION AS TO COUNTS 16 THROUGH 26 and 31

2. As a result of committing the offenses charged in Counts 16 through 26 and Count 31 of this Indictment, the defendants charged in each such count shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such offenses, and all property traceable to such property.

SUBSTITUTE ASSET PROVISION
(Applicable to All Forfeiture Allegations)

3. 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,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(a)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendants up to the value of the forfeitable property described above.

A TRUE BILL



FOREPERSON

Philip R. Sellinger by A2

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER:

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

UNITED STATES OF AMERICA

v.

**MARTINS INALEGWU,
STEINCY MATHIEU,
MOSES CHUKWUEBUKA
ALEXANDER, and
OLUWASEYI FATOLU**

INDICTMENT FOR

**18 U.S.C. §§ 1341, 1343, 1349
18 U.S.C. §§ 1956
18 U.S.C. §§ 1957, 1960
26 U.S.C. § 7201
18 U.S.C. § 2**

A True Bill,


Foreperson

**PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

**MARTHA K. NYE
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
609-989-0579**
