
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Leda D. Wettre
 : :
 : Mag. No. 22-13206
 : :
RICHARD AGYEMAN DUA : **CRIMINAL COMPLAINT**

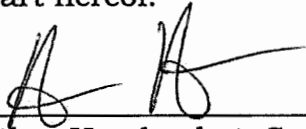
I, Heather Hendershot, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

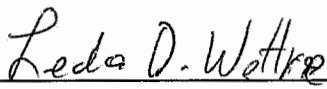
SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Heather Hendershot, Special Agent
Federal Bureau of Investigation

Special Agent Hendershot attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 5th day of August, 2022.



Hon. Leda D. Wettre
United States Magistrate Judge

ATTACHMENT A
(Money Laundering Conspiracy)

From in or around November 2020 through the present, in the District of New Jersey and elsewhere, the defendant

RICHARD AGYEMAN DUA

did knowingly, combine, conspire, confederate, and agree with others to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved 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, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i), in violation of Title 18, United States Code, Section 1956(h).

ATTACHMENT B

I, Heather Hendershot, am a Special Agent of the Federal Bureau of Investigation. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of the relevant facts; (b) my review of publicly available information; and (c) my review of documentary evidence, including business records, bank records, and other documents and records. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background:

1. During the time period relevant to this criminal complaint:
 - a. Richard Agyeman Dua (“Agyeman”) was a resident of Fredericksburg, Virginia.
 - b. Agyeman owned Mineral Logistics LLC (“Mineral Logistics”), an entity which Agyeman used in furtherance of the money laundering conspiracy.
 - c. Co-Conspirator-1 is an individual who has been arrested and charged in the District of New Jersey with money laundering conspiracy.
 - d. Agyeman maintained business bank accounts in the name of Mineral Logistics at several different banks, including at Bank-1, Bank-2, and Bank-3.
 - e. All wire transfers processed through the Fedwire Funds Service (“Fedwire”) were processed in a way that caused an electronic communication to travel through a Federal Reserve facility in New Jersey.
 - f. A “romance scam” was a type of Internet-enabled fraud scheme in which a perpetrator pretends to be romantically interested in the victim, who the perpetrator usually meets through an online dating or social media website. Once the perpetrator has duped the victim into believing that they are in a romantic relationship with each other, the perpetrator relays a series of false stories to fraudulently convince the victim, who is often rendered vulnerable

by the purported emotional bond they believe to have with the perpetrator, to send items and exorbitant amounts of money to various locations for the benefit of the perceived online lover.

Agyeman's Money Laundering Scheme:

2. As set forth below, there is probable cause to believe that Agyeman is laundering the proceeds of internet-enabled romance scams through business bank accounts he controls in the name of Mineral Logistics.

3. After receiving the romance scam victims' money, Agyeman wired thousands of dollars to overseas bank accounts, including accounts in Canada, Hong Kong, and China. Agyeman also wired money to business bank accounts controlled by Co-Conspirator-1.

4. While the investigation remains ongoing, law enforcement believes that Agyeman has received at least approximately \$734,000 in fraudulent proceeds.

Victim-1

5. Victim-1, a resident of Florida, was a victim of a romance scam who, as a part of the fraud, was instructed to send money to Agyeman's Mineral Logistics business bank account at Bank-1.

6. In or around 2019, Victim-1 was contacted through an online dating website by someone purporting to be "Alex Cohen." "Alex Cohen" told Victim-1 that he was a surveyor who worked in Germany and shipped equipment to Germany. "Alex Cohen" told Victim-1 that his shipments had been delayed, and asked Victim-1 to loan him money in the short term to cover the delayed shipments.

7. "Alex Cohen" provided Victim-1 with copies of contracts in an effort to convince Victim-1 that he would be able to repay Victim-1 within thirty days of Victim-1 extending the loan. Victim-1 sent "Alex Cohen" money, who continued to ask for additional funds. "Alex Cohen" convinced Victim-1 to use a home equity line of credit to send additional money to "Alex Cohen," as well as several different credit cards.

8. In or around January 2020, "Alex Cohen" told Victim-1 that he had paid off her credit cards and home equity line of credit. "Alex Cohen" instructed Victim-1 to move money from her home equity line of credit to her checking account and then wire her money to several other accounts at "Alex Cohen's" direction.

9. On or about January 28, 2020, at the direction of "Alex Cohen," Victim-1 wired approximately \$73,000 to Agyeman's Mineral Logistics bank account at Bank-1.

10. After Victim-1 made several payments at "Alex Cohen's" direction, she was contacted by her bank. The bank told Victim-1 that the payments on her equity credit line had been recalled and she now owed approximately \$288,000. As a result of "Alex Cohen's" fraud, Victim-1 lost her house.

11. In total, Victim-1 estimates that she sent approximately \$400,000 to "Alex Cohen."

Victim-2

12. Victim-2, a resident of Tennessee, was a victim of a romance scam who sent money to Agyeman's Mineral Logistics business bank account at Bank-1. Victim-2 met an individual purporting to be named "Nancy Welch" on an online dating website. "Nancy Welch" told Victim-2 that she needed to travel to the Netherlands to collect her father's inheritance, which was approximately 155 kilograms of gold.

13. "Nancy Welch" told Victim-2 that she needed money to pay for documents and customs fees to ship the gold to the United States. As part of the scheme, Victim-2 also engaged with someone purporting to be a lawyer named "Philip Smith."

14. Victim-2 estimates that he sent over \$100,000 at the behest of "Nancy Welch" and "Philip Smith."

15. On or about February 21, 2020, Victim-2 wired approximately \$10,000 to Agyeman's Mineral Logistics bank account at Bank-1.

Victim-3

16. Victim-3, a resident of North Carolina, told law enforcement that he met an individual through Facebook who told Victim-3 that he could make money by paying to assist in the shipping costs for gold. Victim-3 recalled that he sent over at least approximately \$65,000 but did not receive any shipments of gold in return.

17. Bank records reflect that on or about March 12, 2020, Victim-3 wired approximately \$30,000 into Agyeman's Mineral Logistics business bank account at Bank-3. The wire was processed through the Fedwire system.

Victim-4

18. Victim-4, a resident of North Carolina, was a victim of a romance scam who, as part of the fraud, was instructed to send money to Agyeman's Mineral Logistics business bank account at Bank-2.

19. Victim-4 met an individual purporting to be "Claudia Woods" on an online dating website. "Claudia Woods" claimed to work for the Department of Justice. "Claudia Woods" told Victim-4 that she worked in Turkey and Lebanon and received an inheritance from her parents in gold, which was being stored in Dubai. According to "Claudia Woods," she wanted to ship the gold to Victim-4 using a company called "Zegmax Logistics." "Claudia Woods" told Victim-4 about a series of unfortunate events that befell the gold shipment, which required Victim-4 to send money to various companies.

20. On or about October 27, 2021, at "Claudia Woods" direction, Victim-4 wired approximately \$37,700 to Agyeman's Mineral Logistics bank account at Bank-2.

21. Victim-4 estimated that he sent over \$585,000 at "Claudia Woods" direction through the course of the romance scam.

Victim-5

22. Victim-5, a resident of Illinois, met an individual who purported to be named "Annabella Brown" on Facebook. "Annabella Brown" lived in Ghana and told Victim-5 that she had a guaranteed trust fund. In order to get access to the trust fund, "Annabella Brown" asked Victim-5 to send payments for a certificate.

23. At the direction of "Annabella Brown, on or about August 10, 2021, Victim-5 sent approximately \$15,000 to Agyeman's Mineral Logistics business bank account at Bank-2.

24. On or about September 2, 2021, also at the direction of "Annabella Brown," Victim-5 sent approximately \$13,500 to a business bank account controlled by Co-Conspirator-1.

Victim-6

25. Victim-6, a resident of North Carolina, was the victim of a romance scam who met an individual purporting to be named "Joann Stegall" on an online dating website in or around January 2020. "Joann Stegall" told Victim-6 that her late father had an account in Malta that contained approximately \$11.2 million in it. Victim-6 claimed that, in order for "Joann Stegall" to obtain the \$11.2 million inheritance, she needed approximately \$8,600 for a certificate to release the funds.

26. On or about February 13, 2020, at “Joann Stegall’s” direction, Victim-6 wired through Fedwire approximately \$8,600 into Agyeman’s Mineral Logistics business bank account at Bank-3.

27. Thereafter, an individual purporting to be “Joann Stegall’s” lawyer contacted Victim-6 and requested that Victim-6 send additional funds to release the inheritance. After several other requests for funds, Victim-6’s bank investigator cancelled one of Victim-6’s wire transfers, believing it was fraudulent.

Agyeman’s Warning From FBI

28. On or about December 9, 2021, Agyeman was interviewed by the FBI about suspicious wire transfer activity in his bank accounts. Agyeman told the FBI that his business, Mineral Logistics, coordinated purchases from individuals located in Ghana to product producers in China, Canada, and the United States. Agyeman represented to the FBI that he personally knew the individuals who were sending him money, and that, once money was deposited into his accounts, Agyeman would complete the purchase on behalf of the producer and coordinate the shipment to the purchaser, for which he would be paid a small fee.

29. The FBI warned Agyeman that his recent money transfers may have facilitated the transfer of money from victims to fraud perpetrators. Agyeman was provided a letter, which he signed, advising Agyeman that knowingly engaging in a financial transaction that involves funds derived from illegal activity may violate federal money laundering laws, even if Agyeman had no involvement in the underlying criminal conduct.

30. Agyeman did not heed the FBI’s warning. In or around February 2022 and March 2022, Agyeman’s bank accounts had reduced activity compared to previous months. However, Agyeman’s money laundering resumed in or around April 2022.

Victim-7

31. Victim-7 was a resident of Arizona and a victim of a romance scam. Victim-7 believed that he was in a relationship with an individual who purported to be named “Rose Joy,” who he met in approximately July 2020 on an online dating site.

32. At some point in the communication, “Rose Joy” told Victim-7 that her father had left her an inheritance of 150 kilograms of gold bars and 82 acres of land in London. Victim-7 was told further that a lawyer for “Rose Joy’s” father, “Jonathan Baido,” was helping “Rose Joy” with the inheritance.

33. "Rose Joy" told Victim-7 that she also had approximately 500 kilograms of gold in Ghana, and that she and "Jonathan Baido" traveled to Ghana to claim the gold. To help with the costs of obtaining this purported inheritance, Victim-7 sent approximately \$190,000 for "clearance fees" and approximately \$200,000 for "shipping" costs. Victim-7 was told that the gold was "stuck in customs." Victim-7 then sent approximately an additional \$70,000 for the purpose of receiving 22 kilograms of the gold bars. In total, Victim-7 estimates that he lost approximately \$600,000 through the course of the fraud scheme.

34. As a part of the fraud scheme, on or about April 19, 2022, Victim-7 was instructed to wire money to Agyeman's Mineral Logistics business bank account at Bank-2.

35. On or about April 21, 2022, Victim-7 wired approximately \$38,500 to Agyeman's Mineral Logistics business bank account at Bank-2. In addition to Victim-7's wire, Agyeman's Mineral Logistics business bank account at Bank-2 received a wire in the approximate amount of \$100,000 from a man in Texas and a wire in the approximate amount of \$47,475 from a man in Wisconsin.