

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLAUDE NGENEVU CHI (1),
[DOB: ██████████]

FRANCIS CHENYI, SR. (2),
[DOB: ██████████]

LAH NESTOR LANGMI (3),
a/k/a LANGMI NESTOR,
[DOB: ██████████]

Defendants.

Case No. _____

COUNT ONE:

(Conspiracy to Provide Material Support or Resources)

18 U.S.C. § 2339A(a)
NMT 15 Years' Imprisonment
NMT \$250,000 Fine
NMT 3 Years' Supervised Release
Class C Felony

COUNT TWO:

(Providing Material Support or Resources)

18 U.S.C. §§ 2339A(a) & 2
NMT 15 Years' Imprisonment
NMT \$250,000 Fine
NMT 3 Years' Supervised Release
Class C Felony

COUNT THREE:

(Receiving Money from a Ransom Demand)

18 U.S.C. §§ 880 & 2
NMT 3 Years' Imprisonment
NMT \$250,000 Fine
NMT 3 Years' Supervised Release
Class E Felony

COUNT FOUR:

(Conspiracy to Launder Monetary Instruments)

18 U.S.C. §§ 1956(a)(2)(A) & (h)
NMT 20 Years' Imprisonment
NMT \$500,000 Fine
NMT 3 Years' Supervised Release
Class C Felony

\$100 Mandatory Special Assessment on Each
Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COMMON ALLEGATIONS

At all times relevant to this indictment:

1. CHI is a U.S. citizen residing in or around Lee's Summit, Missouri.
2. CHENYI is a U.S. citizen residing in or around St. Paul, Minnesota.
3. LANGMI is a U.S. citizen residing in or around Buffalo, New York.

4. Beginning at a date unknown but no later than January 1, 2018, and continuing until the present, the defendants supported and raised funds for separatist fighters in an ongoing Cameroonian rebellion. The defendants each held senior level positions within an organization that supported and directed the militant separatist group known as the Ambazonian Restoration Forces (ARF) and other separatist fighters within Cameroon's Anglophone regions. The defendants solicited and raised funds for equipment, supplies, weapons, and explosive materials to be used in attacks against Cameroonian government personnel, security forces, and property, along with other civilians believed to be enabling the government. These funds were raised through online chat applications and payment platforms from individuals located in the United States and abroad. The funds were then transferred from various financial and cryptocurrency accounts controlled by the defendants through intermediaries to the separatist fighters to support attacks in Cameroon.

5. In addition to the funds that were raised through voluntary donations, the defendants conspired with others to kidnap civilians in Cameroon and hold them for ransom. In some instances, United States citizens were extorted for ransom payments to secure the release of their kidnapped relatives living in Cameroon. These ransom demands were couched as fines for violating rules imposed by the separatist groups and contributions to the separatist cause. In at least one instance, the defendants coordinated and personally received the ransom

payment from a U.S.-based victim and informed the kidnappers located in Cameroon when the ransom payment was received. The ransom payments were subsequently transferred to the separatist fighters to fund their operations.

MANNER AND MEANS OF THE CONSPIRACY

6. Beginning on a date unknown but no later than January 1, 2018, and continuing until the present, the defendants funded and directed separatist fighters operating in and around Ngo-ketunjia Division, Cameroon (“Ngoketunjia County”). CHENYI acted as the County Chair for Ngoketunjia County. LANGMI acted as the chairman of the Ngoketunjia Security Council, the defense Spokesman for the Ambazonia National Security Council (ANSC), and the chairman of the Balikumbat Local Government Area (LGA) Security Council. CHI acted as the treasurer of the Ngoketunjia Security Council and as the Chairman of the Ndop LGA Security Council.

7. Beginning at a date unknown but no later than January 1, 2018, and continuing until the present, the defendants raised over \$350,000 in donations primarily from donors in the United States and Europe. These funds were used to support the operations of the ARF and other separatist fighters operating in and around Ngoketunjia.

8. The defendants authored a document titled “2020 End of Year Statement NgoketunjiaCounty”, which documented their organization’s accomplishments, income, and expenses. According to these records, the defendants raised \$88,455.00 in 2020. Itemized expenses included at least ten (10) entries related to Improvised Explosive Devices (IEDs) and ten (10) entries related to firearms or ammunition. Other expenditures included funds related to specific separatist operations, including the kidnapping of a traditional leader named Sehm Mbinglo II (holding the title of Fon, or leader, of the Nso people) and Cardinal Christian Tumi on November 5, 2020.

Key events touted by the defendants for Ngoketunjia County during 2020 included:

- a. “Successful disruption of the [la Republique du Cameroun] celebration of their national days namely Feb 11th and May 20th.”
- b. “Disruption of planned meetings by the [la Republique du Cameroun] regime for school resumption in our territory.”
- c. “One-month long lockdown of our territory in solidarity with our traders.”
- d. “Complete push of frogs [(Cameroonian soldiers)] out of our communities.”
- e. “Multiple arrest and prosecution of enablers”
- f. “Successfully intervening and arresting of chief enabler Fon of Nso, Cardinal Tumi and delegation on a campaign trip to Bui, amongst others.”

9. On November 5, 2020, LANGMI issued a voice message to separatist fighters in Cameroon stating he had learned “political enablers” would be traveling through Ngoketunjia County and that any convoy should be “put down.” On or about November 9, 2020, LANGMI described on a Facebook Live video how he learned of the travel plans of the Fon of Nso Sehm Mbinglo II and Cardinal Christian Tumi and coordinated their kidnapping by the Ngoketunjia County ARF on November 5, 2020.

10. On June 2, 2020, CHI sent CHENYI a message requesting funds for an unindicted conspirator known as “Captain Fire” (later “General Fire”) for an attack against various government and civilian buildings in Ndop, Cameroon. The targets included:

- a. Ministry of Economy, Planning and Regional Development (MINEPAT);
- b. Ndop Community Hall;
- c. Royal Garden;
- d. Special Branch Police Station;
- e. Legal Department;
- f. Grandstand, new and old; and
- g. New Divisional Officer (D O) Office.

The cost estimate for the materials was 574,000 Central African CFA francs (XAF). Ngoketunjia County expense reports included a June 9, 2020, entry for this expense titled, “NDOP LGA Mission Logistics” for 575,000 XAF. On June 21, 2020, Captain Fire sent CHI five photos of

buildings in early stages of fire, stating, “The new D O office,” and “The last office down.” CHI responded, “Confirmed our able Captain.”

11. On July 2, 2020, LANMGI submitted a request to CHENYI for 3,000,000 XAF to purchase two (2) firearms for the Vampires of Ngoketunjia County. Ngoketunjia County records prepared by the defendants included a payment on July 11, 2020, for 3,000,000 XAF for two firearms for “Captain Fire”.

12. On December 26, 2020, General Fire sent a message requesting CHENYI appoint him as the head of the Vampires and confirmed his continuing loyalty to the Ngoketunjia Defense Council. CHENYI confirmed that he would appoint General Fire as the leader of the Vampires.

13. On December 2, 2020, CHENYI sent CHI a video recording of a list of materials for constructing IEDs and associated costs, including:

- a. Three buckets of gun powder;
- b. six batteries;
- c. six remote controls;
- d. six starters;
- e. cutting blades;
- f. four buckets of pepper; and
- g. zinc.

The total estimate for the materials was 306,000 XAF. CHENYI asked CHI whether they could sponsor the IED materials “towards the Dec 6th Election,” referring to the December 6, 2020, regional elections held in Cameroon. On December 3, 2020, CHENYI sent CHI a receipt confirming the transfer of 310,000 XAF. This expense was recorded by CHI and CHENYI on Ngoketunjia County accounting documents.

14. On December 16, 2020, CHENYI created a messaging group he called “Bamessing Action Team” with CHI and others, including an unindicted conspirator located in

Cameroon referred to as General “Sargun” or “Sagon”. The conspirators exchanged messages where they advocated for a strategy of employing IEDs against Cameroonian forces. The conspirators encouraged General Sargun to make a video of an IED attack.

15. On December 30, 2020, an unindicted conspirator sent CHI a video of General Fire opening a package of remote detonators and relays and thanked the Ngoketunjia Defense Council for sending them. CHI responded, “great but hope this stay with the defence council only.” The conspirator replied that he’s only sent the video to CHI, “Chairman LANGMI, and Chairman Frank [CHENYI].”

16. On January 11, 2021, CHENYI sent the Bamessing Action Team group a list titled “Materials [for] 5 Explosives,” which included:

- a. Five gas bottles;
- b. three buckets gun powder;
- c. five batteries;
- d. five relays; and
- e. five remote systems.

CHENYI then sent the conspirators a picture and video of IED components, including remote firing systems and electric igniter wires. CHENYI subsequently sent an image of a transfer receipt for 200,000 XAF with the message, “Advance for the project.” The General responded, “Received thanks.”

17. On January 30, 2021, the General sent the Bamessing Action Team group a message stating, “On [January 28, 2021] the Bamessing action group ambushed Ndawara military and there was a number of casualties on their side.i could not have reported because I wanted a clear info about their dead.so we confirmed today morning.” An unindicted conspirator responded, “Good but bro remember we need 1 with popcorn [IED] video so we can account to those who sponsored us.” CHI responded, “more grease to your elbows Gen.”

18. On March 9, 2021, LANGMI sent a recorded voice message to CHI advising that the Governor of Cameroon’s Northwest Region was headed to Ngoketunjia County. LANGMI encouraged all fighters to ensure that the Governor is “picked up” and “does not leave” the territory. An unindicted conspirator forwarded LANGMI’s voice message to the Bamessing Action Team group and stated, “2 [million XAF] 4 any unit that will deliver [the Governor].”

COUNT ONE

(Conspiracy to Provide Material Support or Resources)

19. Paragraphs 1 through 18 of this Indictment are incorporated by reference as fully set forth herein.

20. Beginning on a date unknown but no later than January 1, 2018, and continuing to the present with the exact dates being unknown, in the Western District of Missouri and elsewhere:

CLAUDE NGENEVU CHI

FRANCIS CHENYI, SR.

LAH NESTOR LANGMI

the defendants herein, and other persons known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other, to provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including: currency and monetary instruments (collectively “money”), property, weapons, and services, knowing and intending that such money, property, weapons, and services were to be used in preparation for, and in carrying out, violations of Title 18, United States Code, Sections 956(a), Conspiracy to Kill, Kidnap, and Maim Persons in a Foreign

Country; and 2332a(b), Conspiracy to Use a Weapon of Mass Destruction Outside of the United States.

All in violation of Title 18, United States Code, Section, 2339A(a).

COUNT TWO

21. Paragraphs 1 through 5 and 14 of this Indictment are incorporated by reference as fully set forth herein.

22. On or about December 3, 2020, within the Western District of Missouri, and elsewhere, the defendants,

CLAUDE NGENEVU CHI

FRANCIS CHENYI, SR.

did unlawfully and knowingly provide and attempt to provide material support and resources, to wit: 310,000 Central African CFA francs (XAF), knowing and intending that the material support and resources were to be used in preparation for and in carrying out a violation of Title 18, United States Code, Section 2332a(b), Conspiracy to Use a Weapon of Mass Destruction Outside of the United States.

All in violation of Title 18, United States Code, Sections 2339A(a) & 2.

COUNT THREE

Receiving Money from a Ransom Demand

23. Paragraphs 1 through 5 of this Indictment are incorporated by reference as fully set forth herein.

24. On or about August 12, 2020, within the Western District of Missouri, and elsewhere, defendants,

CLAUDE NGENEVU CHI

FRANCIS CHENYI, SR.

LAH NESTOR LANGMI

received, possessed, and concealed \$1,500 that was obtained from the transmission in interstate and foreign commerce of a communication that contained a demand for ransom for the release of a kidnapped person, in violation of Title 18, United States Code, Section 875(a), knowing the same to have been unlawfully obtained.

All in violation of Title 18, United States Code, Sections 880 and 2.

COUNT FOUR

Conspiracy to Launder Monetary Instruments

25. Paragraphs 1 through 18 of this Indictment are incorporated by reference as fully set forth herein.

26. Beginning on a date unknown but no later than January 1, 2018, and continuing to the present, defendants,

CLAUDE NGENEVU CHI

FRANCIS CHENYI, SR.

LAH NESTOR LANGMI

did unlawfully and knowingly conspire and agree to transmit and transfer monetary instruments and funds from a place in the United States to a place outside the United States, to wit: Cameroon, with the intent to promote the carrying on of specified unlawful activities, to wit: Conspiracy to Use a Weapon of Mass Destruction Outside of the United States, in violation of

Title 18, United States Code, Section 2332a(b), and Conspiracy to Kill, Kidnap, and Maim Persons in a Foreign Country, in violation of Title 18, United States Code, Section 956(a).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and (h).

A TRUE BILL.

11/18/2022
DATE

/s/ Bertha Ross
FOREPERSON OF THE GRAND JURY

/s/ Matthew Blackwood
Mathew Blackwood
Assistant United States Attorney
Western District of Missouri

/s/ Dmitriy Slavin
Dmitriy Slavin
Trial Attorney
Department of Justice