

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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Clerk, U.S. District and
Bankruptcy Courts

Holding a Criminal Term
Grand Jury Sworn in on September 15, 2022

UNITED STATES OF AMERICA,	:	Criminal No.
	:	
v.	:	Offenses:
	:	
CHIDI OLUJIE,	:	18 U.S.C. § 1956(h)
JENNIFER CHIBUEZE, and	:	(Conspiracy to Launder
JESSICA NORTEY,	:	Monetary Instruments)
	:	
Defendants.	:	18 U.S.C. § 1028A(a)(1)
	:	(Aggravated Identity Theft)
	:	
	:	18 U.S.C. § 2
	:	(Aiding and Abetting)
	:	
	:	Forfeiture: 18 U.S.C. § 982(a)(1),
	:	21 U.S.C. § 853(p)

INDICTMENT

The Grand Jury charges that:

At all times relevant to this Indictment:

INTRODUCTION

1. Defendant CHIDI OLUJIE (“OLUJIE”) was a citizen of Nigeria and a resident of Maryland.
2. Defendant JENNIFER CHIBUEZE (“CHIBUEZE”) was a citizen of Nigeria and a resident of Maryland and the District of Columbia.
3. Defendant JESSICA NORTEY (“NORTEY”) was a citizen of Ghana and a resident of Maryland and the District of Columbia.
4. Citibank, N.A. (“Citibank”), PNC Bank, N.A. (“PNC”), Bank of America, N.A. (“BOA”), SunTrust Bank (“SunTrust”), JPMorgan Chase & Co. (“JPMC”), BB&T Corporation

("BB&T"), and Wells Fargo & Company ("Wells Fargo") were each financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").

COUNT ONE
(Conspiracy To Launder Monetary Instruments)

5. Paragraphs 1 through 4 are reincorporated.

6. From at least in or about December 2016 and continuing through at least in or about October 2019, in the District of Columbia and elsewhere, OLUJIE, CHIBUEZE, and NORTEY did knowingly and willfully combine, conspire, confederate, and agree with one another and other persons to violate:

a. Title 18, United States Code, Section 1956(a)(1)(A)(i), by conducting and attempting to conduct financial transactions affecting interstate commerce, that is, the deposits and withdrawals of funds from bank accounts, which involved the proceeds of specified unlawful activity, that is, bank fraud and wire fraud, knowing that the property involved in these financial transactions represented the proceeds of some form of unlawful activity, and with the intent to promote the carrying on of specified unlawful activity; and

b. Title 18, United States Code, Section 1957, by knowingly engaging and attempting to engage in monetary transactions by, through, or to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is by obtaining funds by wire transfer, such property having derived from a specified unlawful activity, that is bank fraud and wire fraud;

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

Goal of the Conspiracy

7. It was the goal of the conspiracy for the defendants, OLUJIE, CHIBUEZE, and NORTEY, and other co-conspirators to unlawfully enrich themselves by laundering the proceeds

of various fraud schemes, including those committed online, and keeping a share of approximately 5-10% of the proceeds.

Manner and Means

Among the manner and means by which OLUJIE, CHIBUEZE, and NORTEY, and other co-conspirators, would and did carry out the objectives of the conspiracy, were the following:

8. In or about December 2018, OLUJIE established a Maryland corporation in the name of Topaz Electronics Exportation.

9. In or about January 2018, OLUJIE established an Indiana corporation in the name of Topaz Brokerage LLC.

10. OLUJIE established bank accounts under his name and under the names of Topaz Electronics Exportation and Topaz Brokerage LLC.

11. OLUJIE received and sent proceeds of fraud.

12. CHIBUEZE established bank accounts under her name and received and sent proceeds of fraud at OLUJIE's direction.

13. CHIBUEZE recruited at least one other individual, Person 1, to participate in the conspiracy.

14. NORTEY established bank accounts under her name and received and sent proceeds of fraud at OLUJIE's direction.

15. **SCHEME 1 (Victim J.B.):** On or about July 12, 2017, OLUJIE established a Citibank bank account ending in 4521 ("Citibank Account 4521") in the name of Chidi T. Olujie.

16. On or about September 15, 2017, OLUJIE established a JPMorgan Chase bank account ending in 1378 ("JPMC Account 1378") in the name of Chidi Topaz Olujie.

17. On or about May 1, 2018, OLUJIE established a PNC bank account with account number ending in 4703 (“PNC Account 4703”) in the name of Topaz Brokerage LLC.

18. On or about October 13, 2016, CHIBUEZE established a Bank of America bank account ending in 7001 (“BOA Account 7001”) in the name of Jennifer Chibueze.

19. On or about September 25, 2017, NORTEY established a SunTrust bank account ending in 5906 (“SunTrust Account 5906”) in the name of Jessica Ashiokai Nortey.

20. On or about March 5, 2018, NORTEY established a Citibank bank account ending in 9414 (“Citibank Account 9414”) in the name of Jessica Nortey.

21. From in or about December 2017 though in or about November 2018, victim J.B. sent wire transfers that he believed were for “Amy Jones.” J.B. met “Amy Jones” online and became romantically interested in “Amy Jones.” However, “Amy Jones” was a romance fraud scheme. That is, in response to requests for money by “Amy Jones,” and based on false and fraudulent pretenses, representations, and promises from the purported “Amy Jones,” J.B. sent the following wire transfers to OLUJIE, CHIBUEZE, and NORTEY totaling \$774,150.00:

Date	Amount	Transaction
12/8/17	\$184,300.00	Payment to NORTEY’s SunTrust Account 5906
1/4/18	\$10,000.00	Payment to OLUJIE’s JPMC Account 1378
1/17/18	\$15,000.00	Payment to OLUJIE’s JPMC Account 1378
1/18/18	\$5,000.00	Payment to OLUJIE’s JPMC Account 1378
1/29/18	\$20,000.00	Payment to OLUJIE’s Citibank Account 4521
2/5/18	\$100,000.00	Payment to OLUJIE’s Citibank Account 4521
2/8/18	\$15,000.00	Payment to OLUJIE’s JPMC Account 1378
2/27/18	\$80,000.00	Payment to OLUJIE’s JPMC Account 1378
3/2/18	\$50,000.00	Payment to OLUJIE’s JPMC Account 1378
3/27/18	\$90,000.00	Payment to OLUJIE’s JPMC Account 1378
4/4/18	\$13,000.00	Payment to OLUJIE’s JPMC Account 1378
4/20/18	\$125,000.00	Payment to NORTEY’s Citibank Account 9414
4/23/18	\$16,500.00	Payment to CHIBUEZE’s BOA Account 7001
8/10/18	\$5,000.00	Payment to OLUJIE’s Citibank Account 4521
8/17/18	\$5,000.00	Payment to OLUJIE’s Citibank Account 4521
8/27/18	\$3,000.00	Payment to OLUJIE’s Citibank Account 4521
9/10/18	\$6,000.00	Payment to OLUJIE’s Citibank Account 4521

9/19/18	\$5,000.00	Payment to OLUJIE's Citibank Account 4521
9/26/18	\$15,000.00	Payment to OLUJIE's Citibank Account 4521
10/11/18	\$6,350.00	Payment to OLUJIE's Citibank Account 4521
10/26/18	\$2,500.00	Payment to OLUJIE's Citibank Account 4521
11/6/18	\$2,500.00	Payment to OLUJIE's Citibank Account 4521

22. Following these deposits, using JPMC Account 1378, OLUJIE caused several wire transfer transactions to be made to several account holders at Diamond Bank Plc, a bank headquartered in Lagos, Nigeria. Relevant transactions involving JPMC Account 1378 include the following wires to Diamond Bank Plc:

Date	Amount	Account Holder
1/5/18	\$8,500.00	Company A
1/18/18	\$13,400.00	Company A
1/19/18	\$4,400.00	Company A
2/12/18	\$13,000.00	Person 3
2/27/18	\$4,000.00	Person 4
2/27/18	\$14,000.00	Person 4
2/28/18	\$25,000.00	Company A
3/1/18	\$25,000.00	Company A
3/2/18	\$20,950.00	Company A
3/5/18	\$25,000.00	Company A
3/6/18	\$19,000.00	Company A
3/6/18	\$2,500.00	Person 3
3/28/18	\$25,000.00	Company A
3/29/18	\$10,000.00	Person 4
3/29/18	\$15,000.00	Company A
3/30/18	\$20,000.00	Company A
3/30/18	\$3,700.00	Person 3
4/2/18	\$6,000.00	Person 4
4/2/18	\$19,000.00	Company A
4/5/18	\$11,650.00	Company A

23. OLUJIE also caused several withdrawals to be made from Citibank Account 4521. Relevant transactions involving Citibank Account 4521 that occurred in the District of Columbia in September 2018 include:

Date	Amount	Transaction
9/10/18	\$5,000.00	Transfer to NORTEY
9/10/18	\$1,000.00	ATM cash withdrawal

9/11/18	\$50.00	Square cash debit
9/11/18	\$950.00	Square cash debit to NORTEY
9/11/18	\$1,000.00	ATM cash withdrawal at 1060 Brentwood Road, NE, Washington, DC
9/21/18	\$3,500.00	Transfer to OLUJIE
9/26/18	\$800.00	ATM cash withdrawal at 1060 Brentwood Road, NE, Washington, DC
9/28/18	\$3,000.00	Transfer to OLUJIE
9/28/18	\$11,500.00	Transfer to NORTEY

24. On or about April 24, 2018, approximately four days after the \$125,000 payment to NORTEY's Citibank account ending in 9414, NORTEY asked OLUJIE via text message, "Do you still want me to wire transfer if 113k today." After confirming with OLUJIE the amount and recipient information, NORTEY went to effectuate the wire transfer. NORTEY messaged OLUJIE, "They ask me where the money come from," followed by "Need your attention ow," "It's emergency," "Source of fund," and "I told them it's family expense." OLUJIE messaged NORTEY, "Hold on. I am trying to get receipt." NORTEY responded, "Ok"; "Next time, when someone deposit the money in my account, you have to send me a receipt to be aware"; and "In case they ask me without my knowledge." Approximately ten minutes after this exchange started, OLUJIE sent NORTEY an image of the wire receipt provided by victim J.B.'s bank for the wire on or about April 20, 2018 in the amount of \$125,000. NORTEY asked OLUJIE, "Should I show it to them?" and OLUJIE responded, "Yes." After further messaging between NORTEY and OLUJIE in which NORTEY explained what the bank has told her, NORTEY was able to wire \$113,000 to a bank headquartered in Lagos, Nigeria on or about April 24, 2018.

25. On or about May 15, 2018, victim J.B. received a FedEx package containing two checks written to "Amy J. Jones." Both checks were written in the amount of \$15,000,000.00 but contained a note that rendered them unredeemable, that is, they could not be deposited or negotiated for funds. The checks were written from PNC Account 4703.

26. OLUJIE exchanged WhatsApp messages with a phone number used by “Amy Jones” to communicate with victim J.B.

27. **SCHEME 2 (Victims S.S. and M.S.):** On or about October 29, 2018, at the direction of CHIBUEZE, Person 1 (whom CHIBUEZE had recruited to participate in the conspiracy) established a PNC bank account ending in 5578 (“PNC Account 5578”) in Person 1’s name.

28. From on or about October 30, 2018 though on or about November 15, 2018, victims S.S. and M.S. sent nine wire transfers totaling \$84,320.29 to PNC Account 5578 that they believed were necessary fees related to the attempted sale of their business located in Macedonia. However, the funds were sent based on false and fraudulent pretenses, representations, and promises; the funds were sent to PNC Account 5578, which had nothing to do with the sale of the business in Macedonia.

29. CHIBUEZE directed Person 1 how to distribute the money received from victims S.S. and M.S. This included providing funds to CHIBUEZE and OLUJIE. Relevant transactions from PNC Account 5578 include:

Date	Amount	Transaction
11/1/18	\$300.00	Debit card purchase in CHIBUEZE’s first name
11/1/18	\$900.00	Debit card purchase in OLUJIE’s first name
11/1/18	\$500.00	ATM cash withdrawal at 650 Pennsylvania Avenue, NW, Washington, DC
11/2/18	\$1,000.00	Debit card purchase in CHIBUEZE’s first name
11/5/18	\$1,000.00	Debit card purchase in CHIBUEZE’s first name
11/5/18	\$1,000.00	Debit card purchase in CHIBUEZE’s first name
11/5/18	\$1,000.00	Debit card purchase in CHIBUEZE’s first name
11/5/18	\$1,000.00	Debit card purchase in CHIBUEZE’s first name
11/15/18	\$5,000.00	Deposit of check written by Person 1 to CHIBUEZE

30. On or about November 7, 2018, CHIBUEZE directed Person 1 to send money to OLUJIE via Cash App by sending Person 1 a screenshot showing the name "Chidi" and handle "\$Copaz," which is OLUJIE's Cash App handle.

31. On or about November 7, 2018, while at PNC Bank in an attempt to withdraw cash from PNC Account 5578, Person 1 sent WhatsApp messages to CHIBUEZE seeking advice about what to tell PNC Bank personnel. Person 1 wrote, "Money come where from"; "They ask me"; "Tell me"; and "Herry." CHIBUEZE responded, "Family member." After messaging further, Person 1 sent CHIBUEZE a photograph of a note written by a PNC Bank employee in order to communicate because Person 1 and CHIBUEZE are deaf. The note read, "We would have to wait on the withdrawal today because we would need to verify the funds that came in just today? Okay?" Person 1 also messaged CHIBUEZE, "They say that what you do need large account from?" In response, CHIBUEZE forwarded an image of the International Credit Transfer receipt for the November 5, 2018 transfer from the company of victims S.S. and M.S. to Person 1 in the amount of approximately \$5,011.62. CHIBUEZE provided this receipt for Person 1 to show PNC Bank personnel in an attempt to lend legitimacy to the transaction. Person 1 followed CHIBUEZE's direction and showed the receipt to PNC Bank personnel.

32. On or about November 9, 2018, Person 1, at CHIBUEZE's direction, withdrew \$5,000 in cash from PNC Account 5578 and deposited the cash into a SunTrust account in CHIBUEZE's name.

33. **SCHEME 3 (Victim E.R.):** On or about April 15, 2019, OLUJIE established a Bank of America bank account ending in 6698 ("BOA Account 6698") in the names of DBA Topaz Electronics Exportation and Chidi Topaz Olujie Sole Prop.

34. On or about June 24, 2019, an individual signed victim E.R.'s name on a Transamerica Annuity Withdrawal Form.

35. On or about July 3, 2019, a wire transfer of \$140,000.00 was sent from the Transamerica account of victim E.R. to BOA Account 6698. This transfer was not authorized by E.R. This transfer was effectuated using E.R.'s name and policy number, along with a fraudulent voided check that listed E.R.'s name as the account holder and BOA Account 6698 as the account number.

36. On or about July 29, 2019, OLUJIE and Co-Conspirator 1 exchanged text messages. OLUJIE wrote, "Bro. The BOA called" and "Saying the money was sent from Wellsfsgo that itâ€™s fraud and I have to pay money back. They donâ€™t want to hear any stories." Co-Conspirator 1 wrote that he was "not the one that did this" and "[a]ll my stuffs are clean." OLUJIE later told Co-Conspirator 1, "Tell your friends to refund the money na. Then collect 80%" and, "The point is I am the one facing this. So tell your people to refund the 140k."

37. On or about August 2, 2019, OLUJIE and Co-Conspirator 1 exchanged more text messages. OLUJIE explained that Bank of America had called him. OLUJIE requested that Co-Conspirator 1 help him with documents. Co-Conspirator 1 asked OLUJIE what documents he needed, to which OLUJIE responded, "Like the proof of 140k Transferwd to me from the buyer. Proof that I have sold electronics to them." Later in the exchange, OLUJIE wrote, "I wanna do the documents to defend myself against anything they plan towards me."; "You get me? Because they said itâ€™s fraud and I must pay back after explaining to them. They said NO. I must pay back"; "So if documents help thatâ€™s fine, not I return the money. Just want to prepare ahead bro"; and "Can you do the documents for me?"

38. On or about August 5, 2019, OLUJIE sent Co-Conspirator 1 a photograph of a letter from Bank of America stating that there had been a claim that the \$140,000 deposit on July 3, 2019 was unauthorized and that a freeze had been placed on OLUJIE's account. Co-Conspirator 1 wrote OLUJIE, "Just give me time make I settle."

39. **SCHEME 4 (Victim Company R.T.I.):** On or about March 22, 2019, OLUJIE established a BB&T bank account ending in 0223 ("BB&T Account 0223") in the name of Chidi Olujie DBA Topaz Electronics Exportation.

40. On or about July 2, 2019, as a result of an e-mail hack, someone posing as victim company R.T.I. fraudulently requested that its account for receiving payment be changed from the company's legitimate account to a BBVA account ending in 0187 ("BBVA Account 0187") in the name of Person 2.

41. On or about July 19, 2019, a payment of \$20,714.00 due to R.T.I. was instead paid to BBVA Account 0187.

42. On or about July 26, 2019, a payment of \$1,704.24 due to R.T.I. was instead paid to BBVA Account 0187.

43. On or about July 22, 2019, a wire transfer of \$15,300.00 was sent from BBVA Account 0187 to OLUJIE's BB&T Account 0223.

44. On or about July 22, 2019, OLUJIE and Co-Conspirator 1 communicated via text message. Co-Conspirator 1 referenced a "20k wire," and OLUJIE responded, "Use bbt." Co-Conspirator 1 then sent OLUJIE an image of the wire transfer request form for the \$15,300.00 transfer from BBVA Account 0187 to BB&T Account 0223. Later that day, Co-Conspirator 1 told OLUJIE, "Funds should be in now."

**(Conspiracy To Launder Monetary Instruments, in violation of
Title 18, United States Code, Section 1956(h))**

COUNT TWO
(Aggravated Identity Theft)

45. Paragraphs 1 through 4 and 7 through 44 are reincorporated.

46. On or about November 7, 2018, in the District of Columbia and elsewhere, OLUJIE, CHIBUEZE, and NORTEY, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, Bank Fraud and Wire Fraud in violation of 18 U.S.C. §§ 1344 and 1343, did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, that is, a credit transfer receipt bearing the name of S.S., knowing that said means of identification belonged to another actual person.

**(Aggravated Identity Theft, in violation of
Title 18, United States Code, Sections 1028A(a)(1) and 2)**

FORFEITURE ALLEGATION

1. Upon conviction of the offense alleged in Count One, the defendants shall forfeit to the United States any property, real or personal, involved in the offense, and any property traceable thereto, pursuant to Title 18, United States Code, Section 982(a)(1). The United States will also seek a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, involved in Count One, and any property traceable thereto.

2. If any of the property described above as being subject to forfeiture, 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 that cannot be divided without

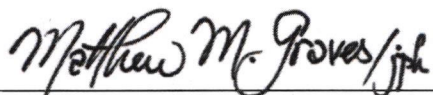
difficulty;

the defendants shall forfeit to the United States any other property of the defendants, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

**(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 982(a)(1);
and Title 21, United States Code, Section 853(p))**

A TRUE BILL:

FOREPERSON.



ATTORNEY OF THE UNITED STATES IN
AND FOR THE DISTRICT OF COLUMBIA