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CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SEALED

7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ALEX ALTOH and OUMAR SIDIBE,
15 Defendants.

CASE NO. 2:24-cr-0030 JAM
18 U.S.C. § 1956(h) – Money Laundering
Conspiracy; 18 U.S.C. § 982(a)(1) – Criminal
Forfeiture

16
17 INDICTMENT

18 The Grand Jury charges:

19 ALEX ALTOH and OUMAR SIDIBE,
20 defendants herein, as follows:

21 **I. INTRODUCTION AND BACKGROUND**

22 At all times relevant to this indictment:

- 23 1. Defendant ALEX ALTOH lived in the County of Sacramento, in the Eastern District of
24 California.
25 2. Defendant OUMAR SIDIBE lived in Reno, Nevada.
26 3. Person 1 was ALTOH’s long-term partner with whom he shared a residence.
27 4. Victim Company 1 was an asbestos abatement and demolition services company
28 headquartered in Texas.

1 5. Victim Company 2 was a shipping, receiving, and supply chain management company
2 headquartered in Georgia.

3 6. Members of the money laundering conspiracy charged in this indictment laundered
4 proceeds of an internet “business email compromise” (BEC) fraud scheme. A BEC is a type of computer
5 intrusion that occurs when an employee of a company is fooled into interacting with an email message
6 that appears to be, but is not, legitimate. In one common BEC scam, an intruder monitors email to
7 determine when a large financial transaction is going to take place. After initial payment instructions are
8 conveyed between legitimate parties to the transaction, the intruder sends a follow-up email that appears
9 to be coming from the original legitimate sender. This “spoofed” email contains a change of plans,
10 instructing that the money be wired instead to an account that is under the intruder’s control and set up for
11 the purpose of receiving the redirected funds.

12 **II. CONSPIRACY**

13 7. From in or around January 2021, and continuing through in or around November 2021, in
14 the State and Eastern District of California and elsewhere, ALTOH and SIDIBE conspired,
15 confederated, and agreed with each other and others known and unknown to the Grand Jury to
16 knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and
17 foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire
18 fraud in violation of 18 U.S.C. § 1343, knowing that the transactions were designed in whole and in part
19 to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the
20 specified unlawful activity, and that while conducting and attempting to conduct such financial
21 transactions, knew that the property involved in the financial transactions represented the proceeds of
22 some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

23 **III. MANNER AND MEANS**

24 8. In furtherance of the conspiracy, ALTOH, SIDIBE, and others known and unknown to
25 the Grand Jury, employed the following manner and means, among others:

26 9. Individuals unknown to the Grand Jury engaged in a fraudulent BEC scheme that
27 deceived at least two victim companies in two states into making payments to bank accounts controlled
28 by ALTOH and Person 1, rather than to the intended beneficiaries of the payments.

1 10. After the victim companies remitted the payments in accordance with the fraudulent BEC
2 instructions, ALTOH, SIDIBE, and others known and unknown to the Grand Jury caused the victim
3 companies' funds to be quickly transferred and laundered from the fraudulent accounts to other bank
4 accounts that were controlled by ALTOH, SIDIBE, and others.

5 11. Specifically, ALTOH, SIDIBE, and others known and unknown to the Grand Jury
6 quickly withdrew much of the funds by way of check deposits, which effectively transferred the funds to
7 other bank accounts held in the legal names of ALTOH, SIDIBE, and others.

8 12. Specifically:

9 **BEC on Victim Company 1**

10 a. On or about August 24, 2021, an employee of Victim Company 1 was tricked into
11 wiring, in connection with payment of an invoice, approximately \$340,500 to Fraudulent Account 1,
12 which was a Wells Fargo bank account held in Person 1's name. The address associated with
13 Fraudulent Account 1 was ALTOH and Person 1's shared address in Citrus Heights, California.

14 b. On or about August 25, 2021, four checks were used to withdraw \$323,000 from
15 the account. One additional check for \$15,000 was withdrawn on August 30, 2021.

16 c. Fraud proceeds in the amount of \$100,000 from Fraudulent Account 1 were deposited
17 by check into two bank accounts held in the name of SIDIBE. One check, dated August 25, 2021, for
18 \$85,000, was deposited into SIDIBE's Bank of America bank account at a branch in Reno, Nevada, and
19 another check, dated August 28, 2021, for \$15,000, was deposited into SIDIBE's Patelco Credit Union
20 account at a branch in Roseville, California.

21 d. From SIDIBE's Bank of America account that received the \$85,000 deposit, SIDIBE
22 wrote two checks, each for \$30,000 and payable to ALTOH. One check was deposited on September 2,
23 2021, and the other on September 3, 2021, into ALTOH's Bank of America account, with both checks
24 deposited at a branch in the Sacramento, California area.

25 e. On or about September 9, 2021, Fraudulent Account 1 was closed by Wells Fargo.
26 The account had only been opened on January 26, 2021. There was only approximately \$2,069.20 left
27 in the account at the time of closing. None of the funds were returned to Victim Company 1.

28 ///

BEC on Victim Company 2

1
2 a. On or about October 26, 2021, an employee of Victim Company 2 was tricked into
3 wiring, in connection with payment of a settlement amount, approximately \$3,508,313 to Fraudulent
4 Account 2, which was a Wells Fargo bank account held in the name of ALEX ALTOH DBA ALTOH
5 RENT A CAR and owned by ALTOH. The address associated with Fraudulent Account 2 was ALTOH
6 and Person 1's shared address is Citrus Heights, California.

7 b. On or about October 26, 2021, through WhatsApp communications, SIDIBE
8 instructed ALTOH where to deposit a portion of the funds, including three accounts at JPMorgan Chase
9 ("Chase") held in the names of purported businesses and one account at Bank of America held in the
10 name of an individual.

11 c. In a span of less than two hours on October 26, 2021, ALTOH deposited five
12 checks in five separate transactions at multiple bank branches in the Sacramento, California, area. This
13 included returning to an earlier Chase bank branch to make a deposit of \$248,000 into ALTOH's own
14 Chase bank account. From these check deposits, as well as an additional check and over-the-counter
15 withdrawal, ALTOH successfully withdrew approximately \$1,138,140 on the same day that the
16 fraudulent transfer was received.

17 d. One of the checks that ALTOH wrote on October 26, 2021, was for \$240,000,
18 which he deposited into a Chase bank account held in the name of Kevin's Party Supply LLC. On
19 November 4 and 5, 2021, the entire \$240,000 was withdrawn with three checks. One of these checks,
20 for \$110,000, was written to SIDIBE and deposited into a Bank of America bank account held in
21 SIDIBE's name.

22 e. On October 27, 2021, the day after the fraudulent BEC transfer, Wells Fargo notified
23 ALTOH via email that it was closing Fraudulent Account 2. The account had only been opened on
24 September 16, 2020. ALTOH sent a screenshot of this email to SIDIBE via Whatsapp. By the time the
25 account was closed, approximately \$2,370,744.01 was left in it and eventually returned to Victim
26 Company 2.

27 14. In total, Victim Companies 1 and 2 transferred approximately \$3,848,813 to bank
28 accounts controlled by either ALTOH or Person 1. In furtherance of a money laundering conspiracy,

1 ALTOH, SIDIBE, and others known and unknown to the Grand Jury, then laundered those funds so as
2 to conceal the nature of their unlawful origin and prevent Victim Companies 1 and 2 from recovering
3 their moneys.

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

5 FORFEITURE ALLEGATION: [18 U.S.C. § 982(a)(1) – Criminal Forfeiture]

6 1. Upon conviction of the offense alleged in this Indictment, defendants ALEX ALTOH and
7 OUMAR SIDIBE shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real
8 or personal, involved in such offense, and any property traceable to such property, including but not
9 limited to the following:

10 a. A sum of money equal to the amount of money involved in the offense, for
11 which defendants are convicted.

12 2. If any property subject to forfeiture, as a result of the offense alleged in this Indictment,
13 for which defendants are convicted:

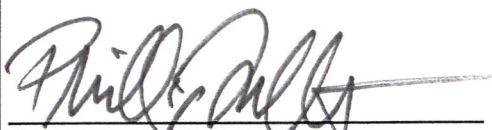
- 14 a. cannot be located upon the exercise of due diligence;
- 15 b. has been transferred or sold to, or deposited with, a third party;
- 16 c. has been placed beyond the jurisdiction of the court;
- 17 d. has been substantially diminished in value; or
- 18 e. has been commingled with other property which cannot be divided without
19 difficulty;

20 it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1), incorporating 21 U.S.C. § 853(p),
21 to seek forfeiture of any other property of defendants, up to the value of the property subject to
22 forfeiture.

23 A TRUE BILL.

24 **/s/ Signature on file w/AUSA**

25 _____
26 FOREPERSON

27 
28 PHILLIP A. TALBERT
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

ALEX ALTOH and
OUMAR SIDIBE

INDICTMENT

VIOLATION(S): 18 U.S.C. § 1956(h) – Money Laundering Conspiracy;
18 U.S.C. § 982(a)(1) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUS:

Foreman.

Filed in open court this 15th ----- day

of February -----, A.D. 20 24 -----

/s/ R. Alvarez

Clerk.

Bail, \$ No bail warrant to issue



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE

United States v. Alex Altoh and Oumar Sidibe
Penalties for Indictment

COUNT 1: **ALL DEFENDANTS**

VIOLATION: 18 U.S.C. § 1956(h) – Money Laundering Conspiracy

PENALTIES: A maximum of up to 20 years in prison; or
Fine of up to \$500,000 or twice the value of the property involved in the
transaction; or both fine and imprisonment
Supervised release of up to three years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION: **All Defendants**

VIOLATION: 18 U.S.C. § 982(a)(1) – Criminal Forfeiture

PENALTIES: As stated in the charging document