

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

Apr 20 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,
V.

KINSTON OSAGIE, and

ROLAND OSAS IGHIWIYISI,
a/k/a ROLAND OSAGIE
a/k/a ROLAND STANLEY,

CR 21-0165 SI

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering
18 U.S.C. § 1957 – Money Laundering
18 U.S.C. § 982(a)(1) – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

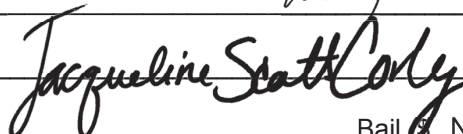
Filed in open court this 20th day of

April 2021.



Ada Means

Clerk



Bail, No bail

Hon. Jacqueline Scott Corley

1 STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

FILED
Apr 20 2021
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,) CASE NO. CR 21-0165 SI
12 Plaintiff,)
13 v.) VIOLATIONS:
14 KINSTON OSAGIE, and) 18 U.S.C. § 1956(h) – Conspiracy to Commit Money
15 ROLAND OSAS IGHIWIYISI,) Laundering;
a/k/a ROLAND OSAGIE,) 18 U.S.C. § 1957 – Money Laundering (Four
16 a/k/a ROLAND STANLEY,) Counts);
17 Defendants.) 18 U.S.C. § 982(a)(1) – Forfeiture Allegation
SAN FRANCISCO VENUE

18
19 INDICTMENT

20 The Grand Jury charges:

21 At all times relevant to this Indictment:

22 INTRODUCTORY ALLEGATIONS

- 23 1. Defendant KINSTON OSAGIE resided in the State of California.
24 2. Defendant ROLAND OSAS IGHIWIYISI resided in various countries outside the United
25 States, including Nigeria. IGHIWIYISI also goes by the names Roland Osagie and Roland Stanley.
26 3. OSAGIE and IGHIWIYISI appeared to be brothers; they routinely discussed common
27 blood relatives, including their mother who lived in Nigeria.
28 4. Unnamed Co-Conspirator 1 (“UCC 1”) is an individual known to the grand jury who

INDICTMENT

1 worked as a middleman in the transfer of money from the United States to Nigeria.

2 5. JP Morgan Chase, TD Ameritrade, Pacific Premier Bank, US Bank, Bank of America,
3 and Citibank were financial institutions, as that term is defined in Title 31, United States Code, Section
4 5312, whose deposits were insured by the Federal Deposit Insurance Corporation.

5 6. Kinecta Federal Credit Union was a federally chartered credit union incorporated and
6 headquartered in California.

7 7. United Bank for Africa Plc was a financial institution incorporated in Nigeria.

8 8. OSAGIE was the President, CEO, Secretary, CFO, and sole director for Kinsuju Inc, a
9 company incorporated in California.

10 9. OSAGIE owned and/or controlled a bank account at US Bank in the name of Kinsuju Inc.
11 ending in 2809 (the "US Bank 2809 account").

12 10. OSAGIE owned and/or controlled a bank account at Pacific Premier Bank in the name of
13 Kinsuju Inc. ending in 8421 (the "PPB 8421 account").

14 11. OSAGIE owned and/or controlled a linked savings and checking account at Kinecta
15 Federal Credit Union in the name of Kinsuju Inc under member number ending in 5892 (the "KFCU
16 5892 member account").

17 12. IGHIWIYISI was an owner and director of Cimic Energy Integrated Limited, a company
18 incorporated in Nigeria.

19 13. IGHIWIYISI owned and/or controlled a bank account at United Bank for Africa Plc in
20 the name of Cimic Energy Integrated Limited ending in 5268 (the "UBA Nigeria 5268 account").

21 UNDERLYING WIRE FRAUD

22 14. Romance scams target persons looking for romantic partners or friendship on dating
23 websites and other social media platforms. The scammers may create profiles using fictitious or fake
24 names, locations, images, and personas, allowing the scammers to cultivate relationships with
25 prospective romance scam victims. Victims may be convinced to provide money or gifts to the
26 scammers, or may be asked to conduct transactions on behalf of the scammers. Beginning at a date
27 unknown, but no later than in or about 2015, a group of conspirators, known and unknown to the grand
28 jury, participated in, devised, and intended to devise a fraudulent romance scheme using the following

1 manner and means, among others: (1) approaching victims on online platforms, including dating
2 websites, using false names; (2) developing a relationship with the victims over texts, telephone, and the
3 internet; and (3) obtaining money from the victims by means of materially false and fraudulent
4 pretenses, representations, and promises, and by omission and concealment of material facts.

5 15. OSAGIE and IGHIWIYISI had a history of creating profiles on dating websites and apps
6 in names that were not their own. In or around May 2019, for example, OSAGIE forwarded to
7 IGHIWIYISI login and verification codes for Tinder accounts under the names “Antonio” and “Antonio
8 Giovanni.” In another instance, OSAGIE used the photo of a local German politician to establish a
9 Match.com profile under the name “Galvin Carlos.”

10 16. Between January 2015 and August 2020, OSAGIE maintained at least 18 different bank
11 accounts, which received approximately \$6 million in cash, check, and wire deposits. OSAGIE received
12 or attempted to receive at least \$3 million into those accounts from primarily romance scheme victims
13 who were duped into transferring money to OSAGIE’s accounts.

14 Victim Y.H.

15 17. In or about February 2019, Y.H. began a relationship with an individual she had met
16 through Match.com who identified himself as “Merry Mattias.” Y.H. and “Mattias” planned to marry
17 and live together. Shortly after they began dating online, “Mattias” requested money from Y.H.
18 “Mattias” made material misrepresentations to Y.H., including providing fraudulent bank information
19 purporting to show that he had sufficient funds to repay Y.H.

20 18. Between March 11, 2019 and April 11, 2019, Y.H. sent four wire transfers from her bank
21 accounts at JPMorgan Chase Bank and TD Ameritrade to the US Bank 2809 account.

22

Sender	Amount	OSAGIE Account	Approx. Date Received
Y.H.	\$231,876.02	US Bank 2809 account	3/12/2019
Y.H.	\$82,073.00	US Bank 2809 account	3/13/2019
Y.H.	\$40,000.00	US Bank 2809 account	3/26/2019
Y.H. (through family trust)	\$47,500.00	US Bank 2809 account	4/11/2019

23
24
25
26
27
28

1 19. On or about March 11, 2019, IGHIWIYISI informed OSAGIE that OSAGIE should be
2 expecting \$313,949 in two separate transactions.

3 20. On or about March 11, 2019, Y.H. sent “Mattias” two images of bank paperwork
4 confirming that she was sending wires in the amount of \$231,876.02 and \$82,073.00 (for a total of
5 \$313,949.02). Less than 25 minutes later, IGHIWIYISI sent OSAGIE the two images that Y.H. had sent
6 to “Mattias.”

7 Victim T.C.

8 21. In or about July 2019, T.C. met an individual who identified himself as “Gavriel
9 Catechis” through a smartphone app called Words With Friends. “Catechis” claimed to be a U.S. Air
10 Force general. Within a few weeks of meeting each other online, “Catechis” introduced T.C. to “Robert
11 William,” a purported diplomat who would be delivering a package to T.C. “William” then asked T.C.
12 for money to help obtain his “release” from various countries.

13 22. Between July 23, 2019 and September 19, 2019, T.C. sent at least two wire transfers from
14 her bank account at JPMorgan Chase Bank to bank accounts in the name of Kinsuju, Inc, which
15 OSAGIE controlled and maintained.

16

Sender	Amount	OSAGIE Account	Approx. Date Received
T.C.	\$27,000	PPB 8421 account	7/23/2019
T.C.	\$19,965	KFCU 5892 member account	9/19/2019

17
18
19

20 23. On or about August 22, 2019, JPMorgan Chase Bank notified Pacific Premier Bank that
21 the \$27,000 wire transfer from T.C. into the PPB 8421 account was disputed. That same day, OSAGIE
22 informed IGHIWIYISI that Pacific Premier Bank had called him to say that the \$27,000 wire transfer
23 from T.C. was fraudulent.

24 24. On or about August 23, 2019, OSAGIE forwarded to IGHIWIYISI an email from Pacific
25 Premier Bank that asked OSAGIE to describe his relationship with the sender of the \$27,000 wire and to
26 explain the foreign wire activities in his account. IGHIWIYISI responded that the sender (*i.e.*, T.C.) had
27 not raised any alarms, and was planning to send another \$200,000 to a different bank account.
28 IGHIWIYISI also sent OSAGIE an image of T.C.’s outgoing wire transfer paperwork for \$27,000, dated

1 July 23, 2019, which included T.C.'s name, address, account information, driver's license number, and
2 telephone number.

3 25. Pacific Premier Bank employees spoke with OSAGIE on August 26, 2019. OSAGIE
4 informed them that his personal and business accounts with Pacific Premier Bank were for real-estate
5 purposes, and that the \$27,000 from T.C. was commission paid to him as part of a real-estate deal. When
6 Pacific Premier Bank informed OSAGIE that he would need to repay the funds, OSAGIE responded that
7 he would call back after he had spoken with the client that paid him the money. Thereafter, Pacific
8 Premier Bank made multiple unsuccessful attempts to contact OSAGIE.

9 26. On or about August 27, 2019, Pacific Premier Bank closed the PPB 8421 account.

10 27. On or about September 19, 2019, IGHIWIYISI informed OSAGIE: "20k done." That
11 same day, T.C. sent an additional wire transfer for \$19,965 from her bank account at JPMorgan Chase
12 Bank to the KFCU 5892 member account.

13 28. On September 25, 2019, OSAGIE informed IGHIWIYISI that Kinecta Federal Credit
14 Union had flagged the transfer from T.C. as fraudulent and had asked OSAGIE to return the funds.
15 OSAGIE also informed IGHIWIYISI that "[s]ince this wahala hit ground, everything de hot."
16 IGHIWIYISI responded with images of T.C.'s outgoing wire transfer paperwork for \$19,965, dated
17 September 19, 2019, which included T.C.'s name, address, account information, driver's license
18 number, telephone number, and wet signature. A few days later, IGHIWIYISI followed up with the
19 name "Gavriel Catechis," to which OSAGIE responded, "Dat na the name?"

20 29. On or about October 28, 2019, Kinecta Federal Credit Union closed the KFCU 5892
21 member account.

22 MANNER AND MEANS OF THE CONSPIRACY TO COMMIT MONEY LAUNDERING

23 Among the manner and means by which the conspirators would and did carry out the conspiracy
24 were the following:

25 30. Beginning on a date unknown but no later than March 2019, and continuing through a
26 date unknown but to at least April 2020, OSAGIE, IGHIWIYISI, and others, known and unknown to the
27 grand jury, caused proceeds from victims of wire fraud that were transferred to accounts owned and/or
28 controlled by OSAGIE to be transferred to Nigeria to accounts owned and/or controlled by

1 IGHIWIYISI. Certain transactions, including the following, involved criminally derived property of a
2 value greater than \$10,000.

3 Victim Y.H.

4 31. On or about March 13, 2019, after OSAGIE had received \$313,949.02 in transfers from
5 Y.H. in the US Bank 2809 account, IGHIWIYISI told OSAGIE to make the “payout” to IGHIWIYISI’s
6 UBA Nigeria 5268 account.

7 32. On or about March 14, 2019, OSAGIE made transfers of varying amounts to bank
8 accounts whose details OSAGIE received from UCC 1, including the following:

- 9 i. OSAGIE sent approximately \$12,165 from his US Bank 2809 account to a Bank of
10 America account ending in 0247 provided by UCC 1;
11 ii. OSAGIE sent approximately \$14,624 from his US Bank 2809 account to a Bank of
12 America account ending in 9866 provided by UCC 1; and
13 iii. OSAGIE sent approximately \$241,000 from his US Bank 2809 account to a Citibank
14 account ending in 9295 provided by UCC 1.

15 33. On or about March 15, 2019, OSAGIE told UCC 1 to credit the funds to IGHIWIYISI’s
16 UBA Nigeria 5268 account. Over the course of the following two weeks, UCC 1 sent confirmations to
17 OSAGIE for various transfers (in Nigerian Naira) that UCC 1 had made to the UBA Nigeria 5268
18 account.

19 34. On or about March 27, 2019, via an encrypted messaging service, OSAGIE provided
20 IGHIWIYISI with an accounting for the \$313,949.02 that OSAGIE had received from Y.H.

21 Victim T.C.

22 35. Between July 29, 2019 and August 6, 2019, after OSAGIE had received \$27,000 from
23 T.C. in the PPB 8421 account, OSAGIE depleted the majority of the proceeds through personal
24 purchases and payments and on money transfers via WorldRemit, a digital application and money
25 services business that facilitates the transfer of funds between various countries, including the United
26 States and Nigeria.

27 36. On or about September 20, 2019, on receiving an additional \$19,965 from T.C. in the
28 KFCU 5892 member account, OSAGIE told UCC 1 that he wanted to make a transfer of \$20,300.

1 OSAGIE then sent approximately \$20,300 from his KFCU 5892 member account to a Citibank account
2 ending in 1698 provided by UCC 1.

3 37. On or about September 24, 2019, UCC 1 sent a confirmation to OSAGIE for a 7.1
4 million Nigerian Naira (approximately \$20,300) transfer that UCC 1 had made to IGHIWIYISI's UBA
5 Nigeria 5268 account. Minutes later, OSAGIE forwarded UCC 1's transfer confirmation to
6 IGHIWIYISI.

7 COUNT ONE: (18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering)

8 38. Paragraphs 1 through 37 of this Indictment are re-alleged and incorporated as if fully set
9 forth here.

10 39. Beginning at a date unknown but no later than March 2019, and continuing through a
11 date unknown but to at least April 2020, in the Northern District of California and elsewhere, the
12 defendants,

13 KINSTON OSAGIE and
14 ROLAND IGHIWIYISI,

15 and others, known and unknown to the grand jury, did knowingly conspire to engage and attempt to
16 engage in monetary transactions by and through financial institutions, in and affecting interstate and
17 foreign commerce, in criminally derived property, to wit, proceeds of wire fraud, of a value greater than
18 \$10,000, in violation of Title 18, United States Code, Section 1957.

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

20 COUNTS TWO THROUGH FIVE: (18 U.S.C. § 1957 – Money Laundering)

21 40. Paragraphs 1 through 37 of this Indictment are re-alleged and incorporated as if fully set
22 forth here.

23 41. Among other transactions, on or about the dates listed in the table below, such dates
24 being approximate, in the Northern District of California and elsewhere, the defendant,

25 KINSTON OSAGIE,

26 did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial
27 institution, in and affecting interstate and foreign commerce, in criminally derived property of a value
28

greater than \$10,000, such funds having been derived from the specified unlawful activity of wire fraud:

Count	Approximate Date	Description of the Monetary Transaction
2	March 14, 2019	Approximately \$12,165 check from OSAGIE's US Bank 2809 account deposited to a Bank of America account ending in 0247 provided by UCC 1
3	March 14, 2019	Approximately \$14,624 check from OSAGIE's US Bank 2809 account deposited to a Bank of America account ending in 9866 provided by UCC 1
4	March 14, 2019	Approximately \$241,000 wire transfer via Fedwire from OSAGIE's US Bank 2809 account to a Citibank account ending in 9295 provided by UCC 1
5	September 20, 2019	Approximately \$20,300 check from OSAGIE's KFCU 5892 member account deposited to a Citibank account ending in 1698 provided by UCC 1

All in violation of Title 18, United States Code, Section 1957.

FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(1))

42. The allegations contained in this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

Upon conviction of the offense set forth in Count One of this Indictment, the defendants,

KINSTON OSAGIE and
ROLAND IGHIWIYISI,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in those offenses, or property traceable to such property, including but not limited to money and property taken by KINSTON OSAGIE and ROLAND IGHIWIYISI and/or a forfeiture money judgment.

Upon conviction of the offenses set forth in Counts Two through Five of this Indictment, the defendant,

KINSTON OSAGIE

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in those offenses, or property traceable to such property, including but not limited to money and property taken by KINSTON OSAGIE and/or a forfeiture money

