
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SAMUEL UCHENNA ANIUKWU,
also known as “Uchenna Samuel
Aniukwu” and “Sammy Maxwell”;
ANTHONY EMEKA IBEKIE,
also known as “Emeka Toni Ibe”; and
JENNIFER GOSHA

CASE NUMBER:
UNDER SEAL

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. From in or around 2016 to on or about June 18, 2020, at Oak Park, Illinois, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant(s) violated:

*Code Section**Offense Description*

Title 18, United States Code, Sections
1343 and 1349

conspired with each other, and others known and
unknown, to commit a wire-fraud scheme

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

SIXTO J. LUCIANO

Special Agent, Homeland Security Investigations

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: July 9, 2020

Judge's signature

City and state: Chicago, Illinois

SHEILA M. FINNEGAN, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, SIXTO J. LUCIANO, being duly sworn, state as follows:

I. INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Special Agent with the U.S. Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”) and have been so employed since 2008. As part of my duties as a Special Agent, I investigate criminal violations relating to white-collar crime, including mail, wire, and bank fraud, as well as other financial and cyber-crimes. Before my employment with HSI, I worked as a Postal Inspector with the U.S. Postal Inspection Service from about April 2008 through August 2008, and as a Special Agent with the Internal Revenue Service, Criminal Investigation from about January 2001 through April 2008. In my capacity as an investigator with these agencies, I have participated in the execution of multiple federal search warrants and arrest warrants.

2. This affidavit is submitted in support of a criminal complaint alleging that Samuel Uchenna Aniukwu, also known as “Uchenna Samuel Aniukwu” and “Sammy Maxwell” (“ANIUKWU”), Anthony Emeka Ibekie, also known as “Emeka Toni Ibe” (“IBEKIE”), and Jennifer Gosha (“GOSHA”) have violated Title 18, United States Code, Sections 1343 and 1349.

3. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law-enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being

submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging ANIUKWU, IBEKIE, and GOSHA with conspiracy to commit wire fraud, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

4. This affidavit also describes portions of written and recorded conversations, which I have summarized. These summaries do not necessarily refer to all of the topics covered during each conversation. In addition, these summaries do not include every conversation made by every writer/author or speaker on the topic being described. Portions of the conversations that are quoted are preliminary transcriptions, which may be subject to modification upon further review. For some conversations, I have offered my understandings and/or interpretations of the conversation, which are based upon my experience and knowledge of the investigation to date, the content and context of the conversations, the experience of other investigators with whom I have consulted, as well as my professional training and experience as a law-enforcement agent.

II. FACTS SUPPORTING PROBABLE CAUSE THAT ANIUKWU, IBEKIE, AND GOSHA HAVE CONSPIRED TO COMMIT WIRE FRAUD

A. INVESTIGATIVE BACKGROUND

5. This complaint application stems from an ongoing investigation into individuals in the Northern District of Illinois, and elsewhere, who are suspected of facilitating, or laundering the proceeds of, various online fraud schemes. As detailed

further below, this investigation has recently involved the use of an undercover agent to communicate with suspected co-conspirators, which, when coupled with other information obtained over the course of the investigation, has generated probable cause to believe that ANIUKWU, IBEKIE, and GOSHA, with others known and unknown, have conspired to commit wire fraud.

6. To date, this investigation has identified several individuals who have conducted overt and affirmative acts in the Northern District of Illinois in furtherance of various online schemes and artifices. Such overt and affirmative acts include the incorporation of business entities and the opening of bank accounts at financial institutions—including those that are federally insured—to facilitate the receipt of funds fraudulently induced from victims through false pretenses, representations, promises, and concealment of material facts, and the subsequent transfer of these funds to accounts maintained abroad.

7. The co-conspirators, known and unknown, have used various means—some of which involve interstate wire communications—to conduct the above overt acts, including the use of telephones, computers, vehicles, correspondence, and the United States Postal Service.

8. In summary, and as explained in more detail herein, the individuals and entities at issue in this investigation were involved in opening accounts at financial institutions in the Northern District of Illinois, and elsewhere, to facilitate the receipt and subsequent transfer of proceeds fraudulently obtained from victims of the following three categories of schemes:

a. Business Email Compromise: a scheme targeting businesses that perform wire transfers. The scheme is typically carried out by: (1) compromising legitimate business e-mail accounts through social engineering or computer-intrusion techniques to gain unauthorized access to the business-email account; (2) blocking or redirecting communications to or from the email account; and then (3) using the compromised email account or a separate fraudulent email account to communicate with personnel from a victim company, attempting to induce the victim company into making a wire transfer under fraudulent pretenses.

b. Romance Fraud: a scheme to defraud a victim on the Internet, whereby a co-conspirator contacts a victim online and builds trust through an online romance. At some point, the co-conspirator will convince a victim to send money to a predetermined recipient under the false pretense that the victim will either get paid back in the future or that the money being sent is part of a business transaction. Romance scams typically target persons looking for romantic partners or friendship on dating websites and other social-media platforms. The scammers may create profiles using fictitious or fake names, locations, images, and personas, allowing the scammers to cultivate relationships with prospective romance-scam victims. Victims may be convinced to provide money or gifts to the scammers, or may be asked to conduct transactions on behalf of the scammers.

c. Inheritance-Fraud Scheme: a variation of an online-investment-fraud scheme, in which a victim is tricked into sending money from his/her bank

account under the false pretense that the victim is about to receive a substantial inheritance.

B. SUMMARY OF EVIDENCE ESTABLISHING THAT ANIUKWU, IBEKIE, AND GOSHA ENGAGED IN A CONSPIRACY TO COMMIT WIRE FRAUD

9. Since in or around 2016, Samuel ANIUKWU (a Nigerian citizen or national with extensive foreign ties), has incorporated or registered several business entities in the Northern District of Illinois with Anthony IBEKIE (also a Nigerian citizen or national with extensive foreign ties), and other known and unknown co-conspirators. ANIUKWU and IBEKIE have created bank accounts for these entities in the Northern District of Illinois together, and with other co-conspirators including Jennifer GOSHA.

10. These bank accounts have collectively received hundreds of thousands of dollars in funds fraudulently obtained from various victims through the use of business-email-compromise, romance-fraud, and inheritance-fraud schemes. Upon their receipt, these fraudulently obtained funds have been disposed by ANIUKWU, IBEKIE, GOSHA, and others through: (1) cash withdrawals in amounts deliberately designed to avoid bank-reporting requirements; (2) interbank transfers used as a means of concealing the original source of the funds; and (3) wire transfers to foreign bank accounts, including those in IBEKIE's name.

11. Emails sent or received by ANIUKWU, as well as account-subscriber information, implicate him in past and ongoing inheritance-fraud schemes bearing characteristics, and involving the use of methods, that are nearly identical to those discovered in the course of an undercover operation. Likewise, emails sent or received

by IBEKIE, as well as account-subscriber information and the results of a forensic fingerprint examination, implicate him in the same inheritance-fraud schemes as ANIUKWU, including the one discovered in the course of the undercover operation.

12. The foregoing undercover operation culminated in a controlled delivery of fraudulently obtained funds to GOSHA, at her residence, around June 18, 2020. At the direction of co-conspirators, an undercover agent was directed to mail these funds to a business entity bearing GOSHA's residence as its mailing address. (That entity, believed to be a fictional business, was registered by a co-conspirator connected to IBEKIE and ANIUKWU through email communications, further described herein.) During the controlled delivery, GOSHA answered the door at her residence, confirmed that the delivery address and recipient were correct, and then attempted to justify receiving mail addressed to a business entity by saying that she was working from home. (In truth, GOSHA is believed to be an employee of the U.S. Postal Service.) GOSHA also indicated that she had been waiting for delivery of the fraudulently obtained funds, which she expected to arrive earlier that same day.

13. Like ANIUKWU and IBEKIE, GOSHA is the registered agent of—or authorized signer for bank accounts associated with—fictional business entities that have received funds fraudulently obtained from various victims. For at least one such account, which has itself received tens of thousands of dollars in fraudulent funds, GOSHA is an authorized co-signer with IBEKIE.

14. As further detailed herein, ANIUKWU, IBEKIE, and GOSHA, together and with others known and unknown, agreed to participate in a scheme to defraud in

which it was reasonably foreseeable that an interstate-wire facility would be used in furtherance of the scheme. Probable cause therefore exists to charge each of these defendants with conspiracy to commit a wire-fraud scheme, in violation of Title 18, United States Code, Sections 1343 and 1349.

C. PRIOR WARRANTS

15. On or about April 20, 2020, the Honorable Virginia M. Kendall, United States District Judge, issued a warrant in Case No. 20 M 215 (the “Gmail Warrant”), authorizing the search of two Gmail accounts associated with ANIUKWU. My application and affidavit in support of the Gmail Warrant (the “April 2020 Luciano Affidavit”), incorporated by reference, details relevant findings of the investigation, including, in pertinent part:

a. Providing background information regarding the co-conspirators that law enforcement has identified, to date, as being involved in the fraudulent schemes mentioned herein, including ANIUKWU and IBEKIE;

b. Summarizing various business entities suspected of being used to facilitate the fraudulent schemes at issue in the investigation, including the corporate formation of those entities, as well as each entity’s receipt of fraudulently obtained funds from a victim individual or victim business; and

c. Detailing evidence of international outgoing wire transfers of funds suspected to have been generated through the fraudulent schemes as well as interactions between Customs and Border Protection (“CBP”) officials, IBEKIE, and ANIUKWU, including evidence of suspected fraud obtained during a border search of digital devices in ANIUKWU’s possession.

16. On or about July 8, 2020, the Honorable Sheila Finnegan, United States Magistrate Judge, issued warrants in Case Nos. 20 M 364, 20 M 365, and 20 M 366 (collectively, the “Premises Warrant”), authorizing the search of three residential premises associated with ANIUKWU, IBEKIE, and GOSHA (namely, the “Oxbow Premises,” “Weber Premises,” and “Harlem Premises,” as further defined therein). The application and affidavit of Internal Revenue Service Criminal Investigation (“IRS-CI”) Special Agent Amy C. Mansker in support of the Premises Warrant (the “Mansker Affidavit”), which is also incorporated by reference, details additional findings of the investigation to date, including, in pertinent part, an undercover operation resulting in sufficient probable cause to search the Oxbow, Weber, and Harlem Premises for evidence, fruits, and instrumentalities of fraud.

D. BACKGROUND REGARDING INTERSTATE-WIRE COMMUNICATIONS

17. Throughout this affidavit, reference is made to email communications exchanged via accounts serviced by AOL, Yahoo, and Google, among others, including email communications originating from or received by computers or digital devices in Illinois and Michigan. Based on my training and experience, and my conversations with agents familiar with investigations involving electronic communications, I know the following:

a. Email and other similar electronic-wire communications travel through the Internet, a global hierarchical network of computers. The backbone of the Internet is made up of physically connected communication cables, switches, and routers that are owned and operated by commercial, government, academic, and other high-capacity network centers.

b. Typically, when an individual (in this context, a “client”) attempts to access a commercial-email service (*e.g.*, those provided by Google, Yahoo, or AOL) to send an email, the client’s computer must first connect to a Domain Name Server (“DNS”). The DNS, in turn, acts as a phonebook for the Internet. For example, when *www.google.com* is entered into an Internet browser, the DNS will look up the IP address for Google and forward the browser onto the relevant IP address. During a typical DNS query, approximately four different servers (DNS Resolver, Root Server, Top Level Domain Server, and Authoritative Name Server) are accessed before the webpage is finally resolved. The aforementioned DNS servers are located in disparate geographic locations, both within and outside of the United States, and virtually always cross state lines.

c. Similarly, when the DNS resolves the IP Address of a commercial-email provider, such as Yahoo! Mail, the IP address provided will not be for the email service itself, but rather the IP address of a Yahoo.com edge server. In the case of Yahoo.com, the edge server—located in New York—is responsible for forwarding the client computer to the IP address of one of Yahoo’s multiple mail servers, which are located throughout the world. The edge server will connect the client to the closest, best-performing mail server accounting for the amount of network activity the email provider is experiencing at any given time. This process allows the email provider to distribute connection activity evenly across its network and is commonly referred to as “load balancing.”

d. Thus, any email communications discussed in this affidavit, the April 2020 Luciano Affidavit, and the Mansker Affidavit, which were sent or received from domains serviced by AOL, Yahoo, and Google, are either: (1) actual interstate-wire communications; or (2) communications for which the use of an interstate-wire facility is reasonably foreseeable.

18. Additionally, throughout this affidavit, reference is made to domestic wire transfers of funds, in addition to international wire transfers. Domestic wire transfers conducted within the United States are cleared through the Fedwire funds-transfer system, an electronic interbank system operated by the Federal Reserve. Based on my training and experience, and other agents' interviews of Federal Reserve employees in prior investigations, I know that Fedwire does not process wire transfers in Illinois but rather in New Jersey and/or Texas. Thus, any Fedwire transfers received by financial institutions in Illinois, as discussed throughout this affidavit, the April 2020 Luciano Affidavit, and the Mansker Affidavit are interstate-wire transactions.

E. HISTORICAL EVIDENCE TYING ANIUKWU, IBEKIE, AND GOSHA TO FICTITIOUS BUSINESSES RECEIVING FRAUDULENT PROCEEDS

19. As detailed further in Section III.B of the April 2020 Luciano Affidavit and Section II.C of the Mansker Affidavit, ANIUKWU, IBEKIE, and GOSHA—among others—have incorporated or registered several business entities with the Illinois Secretary of State (“ILSOS”), and also created individual bank accounts for each entity. In the course of this investigation, agents have tied bank accounts for the entities to the receipt of fraudulently obtained funds from various victim individuals

and victim businesses. These funds were obtained, variously, through the use of business-email-compromise, romance-fraud, and inheritance-fraud schemes. These include, in pertinent part, the following entities and transactions:

a. As detailed further in Section III.B.2 of the April 2020 Luciano Affidavit, EMPERORCHILLS was incorporated with the ILSOS in or around June 2017, with IBEKIE as its registered agent and ANIUKWU as its director and incorporator. In or around June 2017, multiple accounts were opened in EMPERORCHILLS's name at federally-insured banks, with ANIUKWU as the authorized signer. In or around September 2017, one of these accounts received approximately \$119,938 in funds fraudulently obtained through a business-email compromise scheme targeting Victim Business B.E.F. The same day as those funds were received by EMPERORCHILLS, approximately four checks made payable to "Aniukwu Samuel" were drawn from the account, each in the amount of between \$9,300 and \$9,600. Photos obtained from bank-security cameras appear to show ANIUKWU and IBEKIE at a teller counter during the timeframe that two of these checks were deposited at a bank in Naperville, Illinois.

i. Based on my training and experience, I know that financial institutions are required by law to file a currency transaction report ("CTR") with the Financial Crimes Enforcement Network ("FinCEN") for a cash deposit, withdrawal, or exchange of currency exceeding \$10,000. I also know, based on my training and experience, that criminal enterprises routinely limit the amount of any individual deposit or withdrawal of unlawfully obtained currency, in an effort to prevent the

filing of a CTR and thereby avoid detection by law enforcement. This practice—known as “structuring”—is prohibited under federal law, namely, Title 31, United States Code, Section 5324. Here, as noted above, the checks made payable to “Aniukwu Samuel” from the EMPERORCHILLS account were between \$400 and \$700 below the CTR threshold for FinCEN.

b. As detailed further in Section III.B.3 of the April 2020 Luciano Affidavit, MEKAS Construction Inc. was incorporated with the ILSOS in or around July 2017, with IBEKIE as its registered agent and ANIUKWU and IBEKIE as its directors. In or around September and October 2017, multiple accounts were opened in MEKAS’s name at federally-insured banks, with Co-Conspirator 1, Co-Conspirator 2, or IBEKIE as the authorized signers. In or around October and November 2017, more than one of these accounts collectively received approximately \$17,055 in funds fraudulently obtained through business-email compromise, inheritance-fraud, and romance-fraud schemes targeting Victim Business M.W., Victim Individual J.B., and Victim Individual D.J.

i. The inheritance-fraud scheme—in particular—involved a payment to MEKAS’s bank account to retain Pierre Delouis (“Delouis”), a putative attorney supposedly employed by the law firm Hall and Hall Chamber in Toronto, Canada. As noted further in Section II.F.2, below, this is the same putative attorney that an undercover agent was directed to retain in connection with a nearly-identical inheritance-fraud scheme in which ANIUKWU, IBEKIE, and GOSHA are implicated.

c. As detailed further in Section III.B.4 of the April 2020 Luciano Affidavit, SAMTONI Medical Equipment was incorporated with the ILSOS in or around November 2017, with ANIUKWU as its registered agent. In or around November 2017, multiple accounts were opened in SAMTONI's name at federally-insured banks, with ANIUKWU or IBEKIE (sometimes using variants of their names) as the authorized signers. In or around December 2017, one of these accounts received approximately \$45,000 in funds fraudulently obtained through a romance-fraud scheme targeting Victim Individual C.B.

d. As detailed further in Section III.B.5 of the April 2020 Luciano Affidavit, INNOCORD Inc. was incorporated with the ILSOS in or around November 2017, with ANIUKWU as its registered agent and incorporator. Between in or around December 2017 and February 2018, multiple accounts were opened in INNOCORD's name at federally-insured banks, with ANIUKWU (using a variant of his name) as the authorized signer. In or around March 2018, one of these accounts received approximately \$36,850 in funds fraudulently obtained through a business-email compromise scheme targeting Victim Business F.M. Over an approximately five-day period after the fraudulent funds were received, numerous cash withdrawals of between \$159.99 and \$9,700—each falling below FinCEN's reporting threshold for CTRs, but together amounting to approximately \$42,609.99 in withdrawals—were made from the same account. Withdrawal tickets received to date for these transactions all appear, upon lay inspection, to reflect ANIUKWU's signature as seen in bank records and other documents obtained over the course of the investigation.

e. As detailed further in Section III.B.6 of the April 2020 Luciano Affidavit, GREEN HOUSE For Food Industry Inc. was incorporated with the ILSOS in or around December 2017, with ANIUKWU (using a variant of his name) as its registered agent and incorporator. Within days of its incorporation, multiple accounts were opened in GREEN HOUSE's name at federally-insured banks, with ANIUKWU (sometimes using a variant of his name) as the authorized signer. Between in or around February 2018 and April 2019, more than one of these accounts collectively received approximately \$48,980.75 in funds fraudulently obtained through inheritance-fraud and business-email compromise schemes targeting Victim Individual C.H. and Victim Business F.M.

i. The inheritance-fraud scheme—in particular—involved Victim Individual C.H.'s payment to GREEN HOUSE's bank account of a retainer fee for putative attorney Delouis, the same person appearing in several other inheritance-fraud schemes discussed herein, including in the undercover operation noted in Section II.F.2, below.

f. As detailed further in Section III.B.8 of the April 2020 Luciano Affidavit, GODMEKS Inc. was incorporated with the ILSOS in or around April 2018, with ANIUKWU (using a variant of his name) as its registered agent and incorporator. In or around May 2018, multiple accounts were opened in GODMEKS's name at federally-insured banks, with ANIUKWU (using variants of his name) as the authorized signer. In or around August 2019, one of these accounts received

approximately \$45,925.75 in funds fraudulently obtained through an inheritance-fraud scheme targeting Victim Individual D.P.

i. This inheritance-fraud scheme involved Victim Individual D.P.'s payment to GODMEKS's bank account of a retainer fee for putative attorney Delouis, the same person appearing in several other inheritance-fraud schemes discussed herein, including in the undercover operation noted in Section II.F.2, below.

g. As detailed further in Section III.B.11 of the April 2020 Luciano Affidavit, SAMCHINA Trucking Inc. was incorporated with the ILSOS in or around July 2018, with ANIUKWU and Co-Conspirator 3 as its incorporators. Between in or around August 2018 and July 2019, multiple accounts were opened in SAMCHINA's name at federally-insured banks, with ANIUKWU as the authorized signer. In or around June 2019, a cashier's check for approximately \$31,000 was deposited into one of these accounts, consisting of funds fraudulently obtained through a romance-fraud scheme targeting Victim Individual M.S. After the check was deposited, the account made an attempted wire transfer to Nigeria for approximately \$23,000, for "cleaning containers." Security photos obtained from bank-security cameras appear to show ANIUKWU at a teller counter during the timeframe that these transactions occurred at the subject bank.

h. As detailed further in Section III.B.7 of the April 2020 Luciano Affidavit and Section II.C.1 of the Mansker Affidavit, HALL & HALL Global Inc. was incorporated with the ILSOS in or around April 2018, with Co-Conspirator 1 as its registered agent and ANIUKWU (using a variant of his name) as its incorporator.

Within days of its incorporation, multiple accounts were opened in HALL & HALL's name at federally-insured banks, with Co-Conspirator 1 as the authorized signer. In or around April and May 2018, more than one of these accounts collectively received approximately \$204,367.75 in funds fraudulently obtained through business-email compromise and inheritance-fraud schemes targeting Victim Business G.F.E., as well as Victim Business V.M.C. and its principals, Victim Individual V.M. and his/her spouse, Victim Individual R.U. Within days of receiving these funds, withdrawals of several thousands of dollars (including cash withdrawals falling below FinCEN's reporting threshold for CTRs) were made from these accounts by Co-Conspirator 1, as confirmed by a review of withdrawal tickets. Tens of thousands of dollars in funds were also transferred among accounts in Co-Conspirator 1's or HALL & HALL's name at different banks, and at least one wire transfer of approximately \$23,000 was made from Co-Conspirator 1's bank account to a Nigerian bank account in IBEKIE's name.

i. The inheritance-fraud scheme—in particular—involved Victim Individual R.U.'s payment to HALL & HALL's bank account of a retainer fee for putative attorney Delouis, the same person appearing in several other inheritance-fraud schemes discussed herein, including in the undercover operation noted in Section II.F.2, below.

i. As detailed further in Section II.C.2 of the Mansker Affidavit, JENANT Inc. was incorporated with the ILSOS in or around December 2018, with GOSHA as its registered agent, and SETRACO Services, Inc. was incorporated with the ILSOS in or around March 2019 with "Sammy Maxwell" as its registered agent.

In or around January 2019, an account was opened in JENANT's name at a federally-insured bank, with GOSHA as the authorized signer. In or around March 2019, an account was opened in SETRACO's name at the same bank, with "Sammy Maxwell" as the authorized signer. Further, in or around March 2019, these accounts for JENANT and SETRACO collectively received approximately \$206,867.75 in funds fraudulently obtained through an inheritance-fraud scheme targeting Victim Individual C.L. Within days of receiving these funds, withdrawals of several thousands of dollars (including cash withdrawals falling below FinCEN's reporting threshold for CTRs) were made from these accounts by GOSHA or ANIUKWU (who was using the alias "Sammy Maxwell"), as confirmed by a review of withdrawal tickets and bank-security footage. Between in or around March and September 2019, tens of thousands of dollars in funds were also transferred among accounts in SETRACO's name at different banks, and at least one wire transfer of approximately \$25,000 was made from a SETRACO bank account to a Nigerian bank account in IBEKIE's name.

i. This inheritance-fraud scheme involved Victim Individual C.L.'s payment to either JENANT's or SETRACO's bank account of a retainer fee for putative attorney Delouis, the same person appearing in several other inheritance-fraud schemes discussed herein, including in the undercover operation noted in Section II.F.2, below.

j. As detailed further in Section III.B.9 of the April 2020 Luciano Affidavit and Section II.C.3 of the Mansker Affidavit, SAMCORD Inc. was

incorporated with the ILSOS in or around June 2018, with IBEKIE (using a variant of his name) as its registered agent and incorporator. Several days later, an account was opened in SAMCORD's name at a federally-insured bank, with IBEKIE and GOSHA as authorized signers. In or around July 2018, this same account received approximately \$25,000 in funds fraudulently obtained through a romance-fraud scheme targeting Victim Individual A.W. (who later told agents that s/he estimated that s/he lost over \$267,000 as a result of the scheme). Within days of receiving these funds, withdrawals of several thousands of dollars (including cash withdrawals falling below FinCEN's reporting threshold for CTRs) were made from these accounts, including one by IBEKIE, as confirmed by a review of withdrawal tickets.

20. Based on my training and experience, knowledge of this investigation, and conversations with other investigators, I know the following:

a. Criminal enterprises involved in fraud routinely attempt to conceal the origins of illegally obtained money, including through transfers of funds between accounts belonging to fictional business entities, or wire transfers to foreign banks. Here, as demonstrated above, accounts in the name of numerous fictional business entities associated with IBEKIE, ANIUKWU, and their co-conspirators received hundreds of thousands of dollars in fraudulently obtained funds between 2017 and 2019, frequently via wire transfers. Within days of receipt, tens of thousands of dollars were withdrawn from these accounts as checks, or in cash withdrawals falling below FinCEN's reporting threshold for CTRs.

b. The withdrawals were, in turn, re-deposited into other accounts in the name of fictional business entities associated with IBEKIE, ANIUKWU, and their co-conspirators at other banks. Further, tens of thousands of dollars from accounts in the name of fictional business entities associated with IBEKIE, ANIUKWU, and their co-conspirators were wire-transferred to foreign accounts in IBEKIE's name. This sort of financial activity is consistent with a money-laundering scheme designed to hide the origins of fraudulently obtained funds.

F. EVIDENCE OF ANIUKWU'S, IBEKIE'S, AND GOSHA'S PERSONAL INVOLVEMENT IN INHERITANCE-FRAUD SCHEMES

1. TRASH PULL AT LINCOLN PREMISES & FINGERPRINT ANALYSIS OF FORM LETTERS USED IN INHERITANCE-FRAUD SCHEME

21. As noted in Section III.A.1, III.A.2, and III.A.7 of the April 2020 Luciano Affidavit, ANIUKWU and IBEKIE formerly resided at 5206 Lincoln Avenue, in Lisle, Illinois (the "Lincoln Premises"), as confirmed through physical surveillance, driver's license information, telephone subscriber and toll records, and declarations made by these individuals to immigration officials, among other sources of information. ANIUKWU and IBEKIE appear to have vacated the Lincoln Premises, however, in or around April or May 2019. According to ILSOS records, between in or around June 2015 and April 2019, approximately fourteen entities were incorporated with the ILSOS bearing the Lincoln Premises as their address, including EMPERORCHILLS, MEKAS, SAMTONI, GREEN HOUSE, GODMEKS, HALL & HALL, ESIJEMINE, and SAMCHINA.

22. On or about May 1, 2019, agents obtained the trash abandoned outside the curtilage of the Lincoln Premises, as described further in Section III.D of the April

2020 Luciano Affidavit and Section II.D of the Mansker Affidavit. In the trash, agents found what appeared to be form letters addressed to various individuals from the same person, “John Delon,” informing each addressee that Delon was interested in representing him/her in obtaining an approximately \$9.2 million inheritance left behind by a putative deceased relative. (The same individual, Delon, was involved in the inheritance-fraud scheme targeting Victim Individual C.L., as noted above and in Section III.C.2.b of the Mansker Affidavit.) Agents also recovered handwritten notes from the trash, including one bearing username “JohnJeanDelon Gmail Account,” password “JohnJean5206.”

a. “5206,” as noted previously, is the numerical street address for the Lincoln Premises, the location where the above-mentioned trash pull occurred.

23. As described further in Section II.D of the Mansker Affidavit, in or around February and March 2020, three similar letters as those recovered during the Lincoln Premises trash pull were returned to 503 North County Farm Road, Wheaton, Illinois, which is the address for the DuPage County State’s Attorney Office. (Based on the investigation to date, agents have not yet determined why form letters used in furtherance of the schemes under investigation bore this particular return address.) The subject mailings also appeared to be form letters addressed to various individuals from the same person, “Peter Pfizer,” informing each addressee that Pfizer was interested in representing him/her in obtaining an approximately \$11.6 million inheritance left behind by a putative deceased relative, and requesting that the addressee contact Pfizer at Ppfizer456@aol.com. (The same individual,

Pfizer, exchanged communications with an undercover agent, as noted below and in Section III.D.3 of the Mansker Affidavit.) Agents submitted two of the letters for fingerprint analysis to the IRS-CI National Forensic Laboratory, which concluded that one latent print located on one of the envelopes was made by IBEKIE.

2. SUMMARY OF UNDERCOVER OPERATION AND CONTROLLED DELIVERY OF FUNDS OBTAINED THROUGH USE OF INHERITANCE-FRAUD SCHEME

24. On or about May 1, 2020, an IRS-CI Special Agent operating in an undercover capacity (the “UCA”) sent an email to Ppfizer456@aol.com in response to one of the letters received by the DuPage County State’s Attorney Office purporting to be a relative of one of the addressees, Victim Individual W.B. The UCA informed Peter Pfizer that s/he handles the affairs of Victim Individual W.B. and would like to proceed with the transaction on behalf of Victim Individual W.B. At all relevant times during the undercover operation, the UCA was physically located in Michigan.

25. As described further in Section III.D.3 of the Mansker Affidavit:

a. The UCA received a response from Pfizer the same day, on or about May 1, 2020. What followed over the next several days were a series of communications wherein Pfizer directed the UCA to fill out certain forms to lay claim to a putative deceased relative’s bank account with Standard Chartered Bank (the “Inheritance Account”). The UCA was later directed to contact Standard Chartered’s affiliate bank, TD Canada Trust, using the email address ued@tdcanadagroup.com. Several victims cited in the April 2020 Luciano Affidavit (*see* Sections III.B.3.c, III.B.6.b, and III.B.7.b, therein) corresponded with ued@tdcanadagroup.com.

b. In late-May, 2020, the UCA was directed by both a representative of TD Canada Trust and Pfizer to retain the services of Pierre Delouis, a putative attorney with the firm HALL & HALL (the same individual appearing in inheritance-fraud schemes targeting multiple other victims, as noted herein). On or about June 5, 2020, the UCA signed a retainer agreement with Delouis and requested bank-account information related to the payment of certain associated fees. That same day, the UCA had a recorded call with Pfizer, who was using an unknown number. Pfizer instructed the UCA regarding what to say to bank personnel when the UCA wired money to pay the fees due to Delouis, emphasizing that the UCA should tell the bank that s/he was wiring money to purchase goods or merchandise. Further, that same day, Delouis contacted the UCA via email and instructed the UCA to pay the pending fees through a wire transfer to a Chase Bank account in the name of EMETECH Solutions Inc., with an address of the Oxbow Premises (which, as noted below and in the Mansker Affidavit, is IBEKIE's current residence).

i. A search of ILSOS online databases disclosed EMETECH was incorporated on or about March 6, 2020, with IBEKIE as its registered agent. Further, on or about March 10, 2020, a checking account was opened in the name of EMETECH at JP Morgan Chase Bank. The signature card for this account lists Co-Conspirator 4 as the authorized signer and President of EMETECH. The signature card also lists the Oxbow Premises as the address for EMETECH.

c. On or about June 9, 2020, Delouis sent an email to the UCA with revised payment instructions, directing the UCA to send a cashier's check, made

payable GLOBAYO LLC, to 1419 N. Harlem Avenue, Suite B, Oak Park, Illinois 60302 (*i.e.*, the Harlem Premises). As set forth in Section II.E.2 of the Mansker Affidavit, GOSHA resides at the Harlem Premises.

i. A search of ILSOS online databases disclosed GLOBAYO was incorporated on or about June 1, 2017, with Co-Conspirator 5 as its registered agent. Pertinent communications exchanged via email among Co-Conspirator 5, ANIUKWU, and IBEKIE are described further below.

d. On or about June 15, 2020, the UCA obtained a cashier's check for \$1,100 made payable to GLOBAYO (the "UCA Check"). The next day, with the assistance of the U.S. Postal Inspection Service ("USPIS"), agents prepared a U.S. Postal Service Express Mail parcel (the "Express Parcel"). Then, before they placed the UCA Check inside the Express Parcel, agents added a handwritten notation to its face stating: "For Pierre Delouis – Legal Fees." The Express Parcel was addressed to "Globayo LLC" at the Harlem Premises.

e. On or about June 18, 2020, after a BMW SUV currently registered to GOSHA arrived at the Harlem Premises, a Postal Inspector posing as a mail carrier conducted a controlled delivery of the Express Parcel containing the UCA Check to the Harlem Premises. GOSHA answered the door.¹ When asked about the Express Parcel being addressed to a business entity at a residential address, GOSHA looked at the label on the Express Parcel and confirmed that its delivery address was correct.

¹ As detailed in the Mansker Affidavit, GOSHA was identified based on agents' review of an audio-video recording of the controlled delivery, and their general familiarity with GOSHA's appearance from photographs and driver's license records in law-enforcement databases.

GOSHA further said that she had been working from home, an apparent explanation for receiving mail addressed to a business entity at her residence. (From information obtained in the investigation to date, agents believe that GOSHA actually works for the U.S. Postal Service.) Further, GOSHA complained that the Express Parcel should have arrived that morning instead of in the afternoon, indicating her knowledge of the Express Parcel and anticipation of its arrival. Then, GOSHA signed for the parcel as “JGosha.”

26. USPIS obtained a list of all IP addresses that were used to track the Express Parcel delivered to the Harlem Premises. One IP address used to track the Express Parcel around June 17, 2020 was 2600:1700:1cb0:2d80:fc85:e5c4:3128:1fae. Subscriber records obtained from AT&T showed that this IP address is registered to ANIUKWU at the Oxbow Premises (which, as noted below and in the Mansker Affidavit, is IBEKIE’s current residence).² Further, IP addresses associated, between February and April 2020, with online activity for ued@standardgroupservices.com and Ppfizer456@aol.com—two email addresses used to communicate with the UCA, as noted further in Section II.F of the Mansker Affidavit—are also registered to ANIUKWU at the Oxbow Premises.

² As detailed in the Mansker Affidavit, IBEKIE or vehicles known to be used by him have been seen at the Oxbow Premises on over a dozen occasions between January and June 2020. During these instances, IBEKIE was identified based on agents’ general familiarity with his appearance from photographs and driver’s license records in law-enforcement databases.

3. PERTINENT EMAIL COMMUNICATIONS EXCHANGED AMONG ANIUKWU, IBEKIE, AND THEIR CO-CONSPIRATORS

i. Evidence Tying IBEKIE to Use of Specific Gmail Accounts

27. Information obtained from Google showed that the subscribers for two email accounts, aibekie@gmail.com and aristoblake@gmail.com, are “Anthony Ibekie” and “Aristo Blake,” respectively. Both accounts have the same recovery email address, however, of emekarn@yahoo.com. Further, data obtained pursuant to pen-trap orders issued by the Honorable Rebecca R. Pallmeyer, Chief United States District Judge, on or about June 15, 2020, in Case No. 19 GJ 060 (collectively, the “Pen/Trap”), show that the IP address 104.185.26.48 was used to access the account aibekie@gmail.com on or about June 17, 2020.

28. Subscriber records obtained from AT&T show this same IP address is registered to ANIUKWU at the Oxbow Premises (though ANIUKWU resides at the Weber Premises, as detailed further in Section II.G of the Mansker Affidavit). Information obtained from Continental Properties, the management company for the Oxbow Premises and Weber Premises, shows that IBEKIE applied to be added as a tenant of the Oxbow Premises on or about April 29, 2020. Moreover, surveillance and other information obtained over the course of the investigation, as detailed further in Section II.F of the Mansker Affidavit, establishes that the Oxbow Premises—the same address where the account aibekie@gmail.com was accessed on or about June 17, 2020, according to IP address records—is IBEKIE’s current residence (and a location where ANIUKWU has not been seen on multiple instances of surveillance).

29. Information obtained from Continental Properties additionally shows that ANIUKWU is the current tenant at the Weber Premises, with a lease term through November 14, 2020.³ A lease application dated on or about November 14, 2019, which was submitted by ANIUKWU, listed IBEKIE as ANIUKWU's emergency contact and prior landlord. Contact information listed for IBEKIE on this application included the email address aristoblake@gmail.com. Further, communications from aristoblake@gmail.com to other email accounts, discussed further below, are signed by "Tony" (a common abbreviation for IBEKIE's first name, Anthony).

30. Based on my training and experience, knowledge of this investigation, review of the foregoing subscriber records and other information, as well as the contents of email communications detailed below and in the Mansker Affidavit, I believe that the accounts aibekie@gmail.com and aristoblake@gmail.com are used by IBEKIE.

ii. Evidence Tying ANIUKWU to Use of Specific Gmail Accounts

31. On or about November 8, 2019, ANIUKWU was subjected to a border inspection by Customs and Border Patrol ("CBP") officers, upon his return to O'Hare International Airport from a trip abroad. The information obtained from that border inspection is described more fully in Section III.F of the April 2020 Luciano Affidavit.

³ As detailed in the Mansker Affidavit, ANIUKWU has been seen at the Weber Premises on multiple occasions since April 2020, and as recently as July 7, 2020. During these instances, ANIUKWU was identified based on agents' general familiarity with his appearance from photographs and driver's license records in law-enforcement databases. ANIUKWU was not, however, seen at the Oxbow Premises during any instances of physical surveillance conducted by agents there (though multiple IP addresses associated with relevant account activity are subscribed to ANIUKWU at the Oxbow Premises).

During a border search of a MacBook Pro laptop in ANIUKWU's possession, agents saw an email application had data related to the accounts saniukwu1@gmail.com (the "ANIUKWU Gmail Account"), and constantconsultant200@gmail.com (the "Constant Gmail Account").

32. Information obtained from Google showed that the subscriber for the ANIUKWU Gmail Account is ANIUKWU, and that the subscriber for the Constant Gmail Account is "Opia Samuel," with the same recovery-email address as used for the ANIUKWU Gmail Account.

33. Based on my training and experience, knowledge of this investigation, review of the foregoing subscriber records and other information, as well as the contents of email communications detailed below and in the Mansker Affidavit, I believe that the ANIUKWU Gmail Account and Constant Gmail Account are used by ANIUKWU.

34. On or about April 21, 2020, agents executed the Gmail Warrant, which authorized the search of the ANIUKWU Gmail Account and Constant Gmail Account. The results of that search are detailed further in Sections II.G.1 and II.G.2 of the Mansker Affidavit. What follows below are examples of pertinent data recovered from the ANIUKWU and Constant Gmail Accounts, including communications exchanged with aibekie@gmail.com and aristoblake@gmail.com, two accounts that are believed to be used by IBEKIE, as noted above.

iii. Pertinent Communications Exchanged from the ANIUKWU Gmail Account

35. As detailed further in Section II.G.1.b of the Mansker Affidavit, on or about May 15, 2017, an email was sent from the ANIUKWU Gmail Account to IBEKIE at email address aibekie@gmail.com, which included—as an attachment—a form letter used as part of an apparent inheritance-fraud scheme. The substantive content of the letter was similar to those: (1) obtained from the Lincoln Premises trash pull; (2) returned to the DuPage County State’s Attorney Office, one of which bore IBEKIE’s fingerprint on its envelope; and (3) used during the undercover operation discussed above to initiate contact with Peter Pfizer.

36. As detailed further in Section II.G.1.b of the Mansker Affidavit, on or about June 10, 2018, an email was received by the ANIUKWU Gmail Account from Co-Conspirator 5 at [Co-Conspirator 5]@globayo.com, copying IBEKIE as well. The email identified Co-Conspirator 5 as the “President & CEO” of GLOBAYO, IBEKIE as the “CEO of African Money Union,” and ANIUKWU as “Chief Operating Officer of African Money Union.”

a. GLOBAYO is the company to which the UCA was instructed to pay fees associated with retaining putative attorney Delouis, and Co-Conspirator 5 is the registered agent for GLOBAYO, as described above. The UCA Check was made payable to GLOBAYO and delivered to the Harlem Premises through a Controlled Delivery, as further described above. African Money Union is referenced and further described in Section III.E.2 of the April 2020 Luciano Affidavit.

37. As detailed further in Section II.G.1.b of the Mansker Affidavit, on or about September 21, 2019, the ANIUKWU Gmail Account received an email from aristoblake@gmail.com, which included—as an attachment—a form letter used as part of an apparent inheritance-fraud scheme, signed by “Mr. Peter Pfizer.” The substantive content of the letter was similar to those: (1) obtained from the Lincoln Premises trash pull; (2) returned to the DuPage County State’s Attorney Office, one of which bore IBEKIE’s fingerprint on its envelope; and (3) used during the undercover operation discussed above to initiate contact with Peter Pfizer.

38. As detailed further in Section II.G.1.b of the Mansker Affidavit, on or about December 19, 2019, an email was sent from the ANIUKWU Gmail Account to an unidentified recipient at seselambo@yahoo.com, which included—as an attachment—a form letter that appeared to be identical to the letter described above in paragraph 35.

39. As detailed further in Section II.G.1.b of the Mansker Affidavit, an email was sent from the ANIUKWU Gmail Account to an unidentified recipient at peterpf172@gmail.com, which included—as an attachment—approximately 199 form letters addressed to various recipients in alphabetical order, with last names starting with the letters C and D. Each letter was signed by “Mr. Peter Pfizer.” The substantive content of the letters was similar to those: (1) obtained from the Lincoln Premises trash pull; (2) returned to the DuPage County State’s Attorney Office, one of which bore IBEKIE’s fingerprint on its envelope; and (3) used during the undercover operation discussed above to initiate contact with Peter Pfizer.

iv. Pertinent Communications Exchanged from the Constant Gmail Account

40. As detailed further in Section II.G.2.b of the Mansker Affidavit, on or about June 11, 2017, the Constant Gmail Account received an email from aristoblake@gmail.com, copying Hallmark_security@hotmail.com, which was signed by “Tony” (a common abbreviation for IBEKIE’s first name, Anthony). That same day, the Constant Gmail Account received another email from aristoblake@gmail.com, again copying Hallmark_security@hotmail.com, which contained the following text referencing form letters used as part of an apparent inheritance-fraud scheme:

Emeka,

On another thought, since you have the direct mail addresses and I have sent you a sample of the merged email, i suggest you do the merging yourself and send me the already merged letter in a bulk of 100 each, then i can print it, place the stamp in the single window envelope and put them in the mail, i know you said you have 1500 direct mail addresses, that fine, when we exhaust it we can start using the 3000 (selective pre screened direct mail)I just ordered.

God will have mercy on us one day.

Please forward our correspondences to Onowu

Here is our number

Tony 630XXX0699

Sama 630XXX5959

Onowu 080XXXX11430

a. In documents filed by IBEKIE and ANIUKWU with immigration authorities in or around 2016 and 2017, IBEKIE’s contact number is listed as (630) XXX-0699, and ANIUKWU’s contact number is listed as (630) XXX-5959, as discussed further in Sections III.A.1 and III.A.2 of the April 2020 Luciano Affidavit.

III. CONCLUSION

41. Based on the foregoing, as well as the facts set forth in the April 2020 Luciano Affidavit and the Mansker Affidavit (which are each incorporated herein by reference), probable cause exists that ANIUKWU, IBEKIE, and GOSHA, conspired with each other, and others known and unknown, to commit a wire-fraud scheme, in violation of Title 18, United States Code, Sections 1343 and 1349.

FURTHER AFFIANT SAYETH NOT.

SIXTO J. LUCIANO
Special Agent,
Homeland Security Investigations

SUBSCRIBED AND SWORN to before me on July 9, 2020.

Honorable SHEILA M. FINNEGAN
United States Magistrate Judge