
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
: :
v. : Mag. No. 22-9160
: :
WILLIAM KWABENA GOEH : **CRIMINAL COMPLAINT**

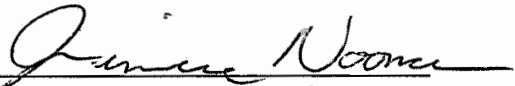
I, Jimena Noonan, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

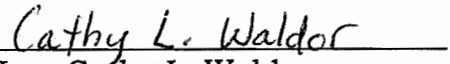
SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Jimena Noonan, Special Agent
Federal Bureau of Investigation

Special Agent Noonan attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 6th day of April, 2022.



Hon. Cathy L. Waldor
United States Magistrate Judge

ATTACHMENT A
(Money Laundering Conspiracy)

From in or around January 2020 through the present, in the District of New Jersey and elsewhere, the defendant

WILLIAM KWABENA GOEH

did knowingly, combine, conspire, confederate, and agree with others to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved proceeds of specified unlawful activity, that is, wire fraud, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code, Section 1956(h).

ATTACHMENT B

I, Jimena Noonan, am a Special Agent of the Federal Bureau of Investigation. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including business records, bank records, and other documents and records. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background:

1. During the time period relevant to this criminal complaint:
 - a. Goeh was a resident of Somerset, New Jersey.
 - b. Goeh was associated with at least two business entities: Kids Way Transportation LLC and Madia AK A NJ, which is a non-profit corporation (collectively, the "Goeh Entities"). Goeh has used bank accounts in the names of the Goeh Entities to launder money.
 - c. Goeh maintained a business account at Bank-1 ("Bank Account-1") in the name of Kids Way Transportation LLC ("Kids Way"). Goeh opened this account on or about December 7, 2020, as a purported operating account for Kids Way. According to Goeh, Kids Way was established on or about October 23, 2020 and had annual gross sales of approximately \$100.
 - d. Goeh maintained another business account at Bank-2 ("Bank Account-2") also in the name of Kids Way. Goeh opened this account on or about June 3, 2021 and was the sole signatory on the account.
 - e. Goeh maintained a bank account at Bank-3 in the name of "Madia AKA NJ Nonprofit Corporation," ("Bank Account-3"). Goeh opened this account in approximately 2018 and is the sole signatory of the account. Goeh told Bank-3 that this entity was a nonprofit entity created to broadcast, advertise, and promote items from West Africa.

Goeh's Money Laundering Scheme:

2. As set forth below, there is probable cause to believe that Goeh is laundering the proceeds of internet-enabled romance scams through business bank accounts held in the name of the Goeh Entities.

3. After receiving suspected romance scam victim money, Goeh withdrew some of the fraud proceeds and also wired thousands of dollars to overseas bank accounts, including accounts in China and the United Arab Emirates.

4. While the investigation remains ongoing, law enforcement believes that Goeh has received at least approximately \$530,000 of money obtained through fraud.

Victim-1:

5. Victim-1,¹ a resident of Ohio and Florida, was the victim of a romance scam who, as part of the scam, was directed to send money to Bank Account-2 and Bank Account-3.

6. Victim-1 met an individual purporting to be "Terry Soller" on a dating website. "Terry Soller" said that he worked as a doctor for the United Nations and was currently in Syria. "Terry Soller" said that he needed money so that another individual, "Markus Richards," could hand-deliver "Terry Soller's" property from Syria to the United States. "Terry Soller" told Victim-1 that he needed Victim-1 to send money to "Markus Richards" on his behalf because there were no banks in Syria.

7. "Terry Soller" continued the fraudulent narrative with Victim-1, stating that "Markus Richards" got detained in Belgium and in the United States and they needed Victim-1 to send money for his release. The investigation to date has revealed that "Terry Soller" has instructed Victim-1 to send more than \$400,000 to various bank accounts controlled by suspects across the United States for "Terry Soller's" benefit.

8. As is common in romance scam fraud schemes, when Victim-1 said she did not have additional money to send to "Terry Soller," "Terry Soller" responded with emotionally charged rhetoric, threatening that: "I feel like killing myself to escape this pain and it'll be on you. . . . [T]rust me that'll be the beginning of both our reputations getting ruined; most especially yours."

9. On or about June 30, 2021, "Terry Soller" instructed Victim-1 to send a \$50,000 wire to Goeh's Bank Account-3 and also instructed Victim-1 to send to be deposited a \$60,000 bank check to Goeh's Kids Way entity. "Terry Soller" told Victim-1 that he needed this money so he could get out of Syria and to

¹ Victim-1 was advised by law enforcement that she was likely the victim of a romance scam and continued sending money to the alias-using perpetrators. Victim-1 has also taken steps in an attempt to conceal that she provided money to the perpetrators and disclosed to law enforcement that she had taken money from her business and used it to send to "Terry Soller."

release a package of his that was purportedly being held by the Department of Homeland Security.

10. On or about June 30, 2021, Victim-1 wired through Fedwire approximately \$50,000 to Bank Account-3.

11. On or about June 30, 2021, a cashier's check from Victim-1 in the approximate amount of \$60,000 was deposited into Bank Account-2.

12. On or about July 28, 2021, "Terry Soller" emailed Victim-1 a threat with the subject "DONT PUSH ME!!" in which he stated: "I'll be looking forward to their different reactions here on Facebook and the public sites as a whole. I wonder what the rabbi's reaction is going to be like as well as your friends, other family members who are yet to find out and your business associates as a whole..You will beg for my attention then when you finalize realize it may be too late."

13. As a part of the scheme, an individual purporting to be "Fitz Gerald" contacted Victim-1 and falsely claimed to be an FBI agent. "Fitz Gerald" told Victim-1 that for thousands of dollars, he could assist Victim-1 in getting her money back from "Terry Soller." According to records from the email provider, the email account used by "Fitz Gerald" has a Nigerian recovery phone number.

Victim-2:

14. Victim-2, a resident of Ohio, was also the victim of a romance scam who, as part of the scam, was directed to send money to Bank Account-2 and Bank Account-3.

15. Victim-2 met a man who purported to be "Hilbert Brown" on a dating website. Victim-2 believed that he and "Hilbert Brown" were in a romantic relationship, and Victim-2 sent at least approximately \$100,000 that he thought was for the benefit of "Hilbert Brown."

16. On or about June 23, 2021, Victim-2 wired approximately \$8,000 to Bank Account-2. On or about June 24, 2021, approximately \$5,000 was withdrawn from Bank Account-2 in cash and approximately \$400 was transferred to an account named "B-Stock Solutions, LLC." On or about June 29, 2021, approximately \$2,300 was wired out of Bank Account-2 to an international shipping company.

17. On or about August 23, 2021, Bank Account-3 received a Fedwire wire from Victim-2 in the approximate amount of \$25,000. The wire listed that it was "funds for Hilbert Brown," his purported romantic interest. On or about August 26, 2021, a deposit of approximately \$10,000 was also made into Bank Account-3. On or about August 26, 2021, Goeh made a counter withdrawal of approximately \$3,000 and executed a wire transfer of approximately \$34,000 to a jewelry company account at a commercial bank in China.

Victim-3:

18. Victim-3, a resident of Nevada, was also the victim of a romance scam who, as a part of the scam, was directed to send money to Bank Account-1.

19. Victim-3 met an individual who purported to be named "Sandra Lisagoh" on an online dating app. Victim-3 believed that he and "Sandra Lisagoh" were dating, and the two planned to meet. "Sandra Lisagoh" told Victim-3 that her father left to her as a part of her inheritance 25 gold bars. "Sandra Lisagoh" directed Victim-3 to send money to various individuals in connection with assisting "Sandra Lisagoh" in collecting her purported inheritance. As a part of the scam, Victim-3 sent approximately \$60,000 for the benefit of "Sandra Lisagoh."

20. On or about June 21, 2021, Victim-3 wired approximately \$10,780 to Bank Account-1. Victim-3 wired this money for the benefit of "Sandra Lisagoh" and thought he was sending money to pay for a lawyer in London to assist them in transferring the inherited gold bars to the United States.

21. After approximately a year of communicating with "Sandra Lisagoh," the individual told Victim-3 that her name was actually "Tanya Tate," and "Tanya Tate" claimed to be a pornographic actress. "Tanya Tate" provided Victim-3 with an address in New Mexico where she purportedly resided. Victim-3 traveled to the New Mexico address twice, but the woman with whom he thought he had been communicating did not reside at the provided address.