

18 MAG 5227

Approved: Sagar K. Ravi  
SAGAR K. RAVI  
Assistant United States Attorney

ORIGINAL

Before: THE HONORABLE HENRY B. PITMAN  
United States Magistrate Judge  
Southern District of New York

- - - - -X

UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
	:	
- v. -	:	Violations of
	:	18 U.S.C. §§ 371,
	:	1349, and 1956
MUFTAU ADAMU,	:	
a/k/a "Muftau Adams,"	:	COUNTY OF OFFENSE:
a/k/a "Muftau Idrissu,"	:	BRONX
PRINCE NANA AGGREY,	:	
ABDUL RASHID MASOUD, and	:	
MUBARAK BATURI,	:	
a/k/a "Eben Karsah,"	:	
	:	
Defendants.	:	
	:	

- - - - -X

SOUTHERN DISTRICT OF NEW YORK, ss.:

WILLIAM R. MCKEEN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE  
(Conspiracy to Commit Wire Fraud)

1. From at least in or about April 2014, up to and including at least in or about November 2017, in the Southern District of New York and elsewhere, MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Idrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Conspiracy to Receive Stolen Property)

3. From at least in or about April 2014, up to and including at least in or about November 2017, in the Southern District of New York and elsewhere, MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, a violation of Title 18, United States Code, Section 2315.

4. It was a part and object of the conspiracy that MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of goods, wares, merchandise, securities, and money, of the value of \$5,000 and more, which had crossed a state boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, in violation of Title 18, United States Code, Section 2315.

OVERT ACTS

5. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about November 14, 2017, a fraudulent email requesting a transfer of \$35,760 was sent from an individual purporting to be a known lawyer of a real estate services company in New York, New York ("Victim-1") to an employee of Victim-1, who was also located in New York, New York.

b. On or about November 22, 2017, MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," the defendant, sent a text message instructing a coconspirator ("CC-1"), in substance and in part, to pick up funds deposited in a bank account in the Bronx, New York that were fraudulently obtained from Victim-1.

c. On or about July 28, 2014, PRINCE NANA AGGREY, the defendant, received a wire transfer of approximately \$270,000 in a bank account AGGREY controlled in the Bronx, New York.

d. On or about February 13, 2015, ABDUL RASHID MASOUD, the defendant, received a wire transfer of approximately \$265,000 in a bank account MASOUD controlled in the Bronx, New York.

e. On or about January 26, 2015, MUBARAK BATURI, a/k/a "Eben Karsah," the defendant, received a wire transfer of approximately \$50,000 in a bank account BATURI controlled in the Bronx, New York.

(Title 18, United States Code, Section 371.)

COUNT THREE

(Money Laundering Conspiracy)

6. From at least in or about April 2014, up to and including at least in or about November 2017, in the Southern District of New York and elsewhere, MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together

and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B).

7. It was a part and object of the conspiracy that MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

8. I am a Special Agent with the FBI and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, witnesses, and others, as well as my examination of report and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

#### Overview of the Conspiracy

9. Since in or about November 2017, the FBI has been investigating a criminal enterprise (the "Enterprise") based in Ghana that committed a series of frauds against individuals and businesses located across the United States, including in the Southern District of New York. The frauds perpetrated by the

Enterprise consisted of business email compromises and romance scams.

a. The Enterprise conducted the business email compromises through the spoofing of email accounts. Specifically, the Enterprise used slight variations on legitimate email addresses of employees of a company or third parties engaged in business with the company to trick other employees of the company with access to the company's finances into thinking the fake email accounts were authentic. The fake email accounts were then used to send instructions to wire money to certain bank accounts and also included fake authorization letters for the wire transfers that contained forged signatures of company employees. By utilizing this method of deception, the Enterprise sought to trick the victims into transferring hundreds of thousands of dollars to bank accounts the victims believed were under the control of legitimate recipients of the funds as part of normal business operations, when in fact the bank accounts were under the control of members of the Enterprise.

b. The Enterprise conducted the romance scams by using electronic messages sent via email, text messaging, or online dating websites that deluded the victims, many of whom were vulnerable, older men and women who lived alone, into believing the victim was in a romantic relationship with a fake identity assumed by members of the Enterprise. Once members of the Enterprise had gained the trust of the victims using the fake identity, they used false pretenses such as the promise of being paid back or receiving a portion of an investment to cause the victims to wire money to bank accounts the victims believed were controlled by their romantic interests, when in fact the bank accounts were controlled by members of the Enterprise. At times, the members of the Enterprise also used false pretenses to cause the victims to receive funds in the victims' bank accounts, which, unbeknownst to the victims, were fraud proceeds, and to transfer those funds to accounts under the control of members of the Enterprise. The members of the Enterprise, posing as the romantic interest of the victims, also introduced the victims to other individuals purporting to be, for example, consultants or lawyers, who then used false pretenses to cause the victims to wire money to bank accounts controlled by members of the Enterprise.

c. MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, and other known and

unknown members of the Enterprise, received or otherwise directed the receipt of fraud proceeds from victims of the Enterprise in bank accounts that they controlled in the Bronx, New York. Some of these bank accounts were opened using fake names, stolen identities, or shell companies in order to avoid detection and hide the true identities of the members of the Enterprise controlling those accounts. Once the defendants received the fraud proceeds in bank accounts under their control, the defendants withdrew, transported, and laundered those fraud proceeds to other members of the Enterprise, including those located in Ghana.

Scheme to Defraud Victim-1, Victim-2, and Victim-3

10. Based on my review of emails received by an employee (the "Employee") of Victim-1 and records of Victim-1's bank account ("Account-1") at a bank located in New York, New York, as well as my familiarity with the investigation, I have learned the following, in substance and in part:

a. On or about November 14, 2017, the Employee received an email from an individual purporting to be a known lawyer of Victim-1 requesting the Employee to transfer approximately \$35,760 to a bank account ("Account-2") belonging to an individual ("Victim-2") at a bank in Wisconsin.

b. Subsequently on or about November 14, 2017, the Employee initiated a wire transfer of approximately \$35,760 from Account-1 to Account-2 ("Fraudulent Transfer-1").

c. On or about November 21, 2017, the Employee received another email from an individual purporting to oversee Victim-1's finances requesting the Employee to transfer approximately \$51,450 to Account-2.

d. Subsequently on or about November 21, 2017, the Employee initiated a wire transfer of approximately \$51,450 from Account-1 to Account-2 ("Fraudulent Transfer-2").

e. In or about November 2017, in addition to the other emails referenced above, the Employee received at least three other emails requesting the Employee to transfer a total of over approximately \$750,000 to three different bank accounts believed to be under the control of members of the Enterprise.

11. Based on my review of records for Account-2 and my familiarity with the investigation, I have learned the following, in substance and in part:

a. On or about November 15, 2017, the day after Fraudulent Transfer-1 was made to Account-2 in the amount of approximately \$35,760, Victim-2 initiated a wire transfer of approximately \$29,000 from Account-2 to a business bank account ("Account-3") held in the name of a limited liability company containing the last name of an individual ("Victim-3") at a bank located in Virginia. As discussed below, Victim-2 was acting at the direction of an individual believed to be a member of the Enterprise. The coconspirator ("CC-2") who subsequently withdrew the stolen funds from Account-3 used the identity of Victim-3 without Victim-3's permission to open and maintain Account-3.

b. On or about November 22, 2017, the day after Fraudulent Transfer-2 was made to Account-2 in the amount of approximately \$51,450, Victim-2 initiated a wire transfer of approximately \$37,500 from Account-2 to a bank account ("Account-4") at a bank located in the Bronx, New York. The transfer was subsequently cancelled by the bank due to suspicion arising from the purpose provided for the transfer, namely the paying of a charge card.

c. On or about November 24, 2017, Victim-2 withdrew approximately \$48,000 in cash and deposited approximately \$46,500 into Account-4. CC-1 subsequently withdrew the stolen funds from Account-4 and used a fake identity to open and maintain Account-4.

12. Based on the FBI's investigation of a romance scam involving Victim-2, as well as my review of reports of interviews of Victim-2 and documents provided by Victim-2 to the FBI, I have learned the following, in substance and in part:

a. Victim-2 was a 69-year-old single woman residing in Wisconsin who met a purported male individual ("Individual-1") on an online dating site. Victim-2 entered into an online relationship with Individual-1 and never met Individual-1 in person.

b. Individual-1 told Victim-2, in substance and in part, that Individual-1 was temporarily residing in Ghana, intended to return to the United States, and was seeking to move

bars of gold he purchased in Ghana to the United States but had encountered many problems.

c. Individual-1 introduced Victim-2 to various professionals who were purporting to help Individual-1 move the gold bars from Ghana to the United States, including a woman purporting to be a consultant for Individual-1 (the "Consultant").

d. Victim-2 sent numerous payments to various individuals in an effort to help Individual-1 and also received funds in her bank account from other individuals in the United States, which Victim-2 transferred to other bank accounts at the instruction of Individual-1 or Individual-1's associates, such as the Consultant.

e. Individual-1's associates instructed Victim-2 to transfer the money Victim-2 received from Victim-1 to Account-3 and Account-4.

f. Among other transactions, Victim-2 also transferred approximately \$16,700 to MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," the defendant, because Victim-2 was told by Individual-1 or Individual-1's associates that ADAMU was a broker who would help sell Individual-1's gold in Dubai.

13. Based on my familiarity with the investigation, I know that law enforcement agents have recovered two phones, an iPhone (the "CC-1 iPhone") and a Samsung phone ("CC-1 Samsung"), from CC-1 in connection with CC-1's arrest in or about January 2018, and have obtained a warrant to search and review both phones.

14. Based on my review of WhatsApp messages between the CC-1 iPhone and a phone number ending in 9663 (the "Adamu Phone"), I have learned the following, in substance and in part:

a. On or about November 7, 2017, the CC-1 iPhone texted the account information for Account-4 that received approximately \$46,500 in stolen funds from Victim-1 to the Adamu Phone.

b. On or about November 22, 2017, the Adamu Phone texted the CC-1 iPhone a photo of the wire transfer request form for the attempted transfer by Victim-2 of approximately \$37,500 from Account-2 to Account-4. The Adamu Phone subsequently texted the following, in substance and in part, to the CC-1



iPhone: "[bank name for Account-4] still active?"; "Job go come"; and "Time for pick up."

c. Subsequently on or about November 22, 2017, the Adamu Phone texted the CC-1 iPhone a screenshot of a text message conversation with Victim-2 regarding Account-4. The Adamu Phone subsequently texted the following, in substance and in part, to the CC-1 iPhone: "I want a fresh account"; and "Check from ur side."

15. Based on my review of photos in the CC-1 iPhone, I know that the CC-1 iPhone contains photographs of CC-1 and MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," the defendant, posing together.

#### Scheme to Defraud Victim-4

16. Based on the FBI's investigation of a romance scam involving a female individual ("Victim-4"), as well as my review of a report of an interview of Victim-4 and documents provided by Victim-4 to the FBI, I have learned the following, in substance and in part:

a. Victim-4 was a 67-year-old widow residing in Minnesota whose son had passed away. Victim-4 responded to an advertisement in a newspaper and began a relationship with a purported male individual ("Individual-2") who was interested in romantic relationship with Victim-4.

b. Victim-4 communicated with Individual-2 largely through phone conversations or text messaging.

c. Individual-2 told Victim-4, in substance and in part, that Individual-2 was seeking to escape from Ghana and that Victim-4 needed to send money to assist him to leave Ghana.

d. Subsequently, Individual-2 also told Victim-4, in substance and in part, that Individual-2 was being held by authorities in England and needed money to release gold bars he had. Individual-2 also sent Victim-4 documentation purporting to be from the Ministry of Mines of Ghana certifying Individual-2's ownership of gold bars.

e. Victim-4 made the following transfers totaling over approximately \$800,000 in an effort to assist with the release of Individual-2 and his gold:

i. On or about July 28, 2014, Victim-4 wired approximately \$270,000 to a bank account in the name of "Prince Auto and Export" in the Bronx, New York (the "Prince Auto Account"), which was owned by PRINCE NANA AGGREY, the defendant.

ii. In or about February 2015, Victim-4 wrote four checks totaling approximately \$270,000 to MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," the defendant.

iii. On or about February 13, 2015, Victim-4 wired approximately \$265,000 to a bank account in the name of ABDUL RASHID MASOUD, the defendant, in the Bronx, New York (the "Masoud Account").

17. Based on my review of bank records for three bank accounts ("Adamu Account-1," "Adamu Account-2," and "Adamu Account-3," collectively, the "Adamu Accounts") in the name of MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," the defendant, at two different banks, I have learned the following, in substance and in part:

a. Adamu Account-1 was opened in or about June 2016 using a New York driver's license for ADAMU with photo identification.

b. The address listed for each of the Adamu Accounts was the same address in the Bronx, New York.

c. The phone number provided by ADAMU in connection with the opening of Adamu Account-1 was the same phone number as the Adamu Phone.

d. Between on or about February 17, 2015 and on or about April 2, 2015, the Adamu Account-2 had four deposits totaling approximately \$270,000, which matched the total amount on the checks written to ADAMU from Victim-4.

e. On or about March 31, 2017, the Adamu Account-1 received a wire transfer of approximately \$16,700 from Victim-2.

f. Between in or about October 2014 and in or about November 2017, the Adamu Accounts had deposits greater than approximately \$500 that totaled approximately \$760,000, and had withdrawals greater than approximately \$500 that totaled approximately \$715,000. A majority of the deposits consisted of large wire transfers from various individuals or cash deposits, and the withdrawals were largely in cash.

18. Based on my review of bank records for the Prince Auto Account held by PRINCE NANA AGGREY, the defendant, I have learned the following, in substance and in part:

a. The Prince Auto Account was opened on or about December 10, 2013 using a New York driver's permit for AGGREY with photo identification.

b. The address listed for the Prince Auto Account was located in the Bronx, New York (the "Aggrey Address").

c. On or about July 28, 2014, the Prince Auto Account received a wire transfer of approximately \$270,000 from Victim-4.

d. Between in or about January 2014 and in or about December 2014, the Prince Auto Account had deposits greater than approximately \$500 that totaled approximately \$569,000, and had withdrawals greater than approximately \$500 that totaled approximately \$540,000. A majority of the deposits consisted of large wire transfers from various individuals or cash deposits, and the withdrawals were largely in cash.

19. Based on my review of WhatsApp messages contained in the CC-1 Samsung, I have learned the following, in substance and in part:

a. On or about December 24, 2016, a phone number ending in 8704 (the "Aggrey Phone") texted the CC-1 Samsung a photo of a New Jersey driver's license for "PRINCE N AGGREY," which contained a photo of PRINCE NANA AGGREY, the defendant.

b. On or about June 27, 2017, the Aggrey Phone texted the CC-1 Samsung a photo of a notice from the New York City Department of Finance addressed to "Prince N Aggrey" regarding an unpaid violation for a vehicle (the "Aggrey Notice").

c. On or about June 27, 2017, approximately one hour after the Aggrey Phone texted the Aggrey Notice to the CC-1 Samsung, the CC-1 Samsung texted the Aggrey Notice to the Adamu Phone.

20. Based on my review of bank records for a bank account in the name of "Prince N. Aggrey" (the "Aggrey Account") held by PRINCE NANA AGGREY, the defendant, I have learned the following, in substance and in part:

a. The Aggrey Account was opened on or about August 8, 2016 using a New Jersey driver's license for AGGREY with photo identification.

b. The phone number provided for the Aggrey Account was the number for the Aggrey Phone.

c. The address listed for the Aggrey Account was the Aggrey Address.

21. Based on my review of bank records for the Masoud Account held by ABDUL RASHID MASOUD, the defendant, I have learned the following, in substance and in part:

a. The Masoud Account was opened on or about January 21, 2010 using a New York State identification card for MASOUD with photo identification.

b. The address listed for the Masoud Account was located in the Bronx, New York.

c. On or about February 13, 2015, the Masoud Account received a wire transfer of approximately \$265,000 from Victim-4.

Scheme to Defraud Victim-5 and Victim-6

22. Based on the FBI's investigation of a business email compromise involving a law firm ("Victim-5") and a romance scam involving a male individual ("Victim-6"), as well as my review of a report of an interview of Victim-6, I have learned the following, in substance and in part:

a. On or about April 16, 2015, Victim-5 sent approximately \$248,278 in proceeds from a real estate settlement to a bank account in the name of Victim-6. An employee of Victim-5 believed that the funds were being sent to Victim-6 based on email communications with the seller of a real estate property (the "Seller"), when in fact the employee was communicating with an individual purporting to be the Seller that used an email address that was slightly different from the legitimate email address of the Seller.

b. Victim-6 was a 64-year-old man residing in Colorado who was separated from his wife and began a relationship with a purported female individual ("Individual-3") he had met online.

c. Individual-3 told Victim-6, in substance and in part, that Individual-3 was deaf and could only communicate through texting on the phone. Individual-3 and Victim-6 therefore communicated primarily through text messaging.

d. Individual-3 told Victim-6, in substance and in part, that Individual-3 sold beads from Nigeria that cost \$18,500 per box and that Victim-6 should buy the beads so that Individual-3 could visit him. As a result, Victim-6 purchased four to six boxes of beads from Individual-3.

e. After the bead purchases, Individual-3 told Victim-6, in substance and in part, that Individual-3 needed to wire some of her profits overseas, that Individual-3 needed Victim-6's help because she did not have a bank account, and that Individual-3 would pay a fee to Victim-6. As a result, Victim-6 agreed to help Individual-3 by receiving large wire transfers into his bank account and transferring the money to other individuals at the direction of Individual-3.

f. Victim-6 wired money to someone named "Mubarak Baturi" in the Bronx, New York as well as multiple other individuals.

#### Scheme to Defraud Victim-7

23. Based on my review of a complaint made to the FBI on or about June 14, 2017 by a romance scam victim ("Victim-7"), I have learned the following, in substance and in part:

a. Victim-7 was a male individual residing in Alabama who was more than 60 years old. From in or about 2014 through in or about 2016, Victim-7 was in a relationship with a purported female individual ("Individual-4") he had met online.

b. Individual-4 told Victim-7, in substance and in part, that her father had passed away, that she had a \$3 million inheritance in Ghana which she needed Victim-7's money to release, and that there was another \$1 million in another bank for which taxes had to be paid to be released.

c. Victim-7 sent money to "Mabarak Baturi," the purported cousin of the attorney representing the estate of Individual-4's father, as well as "Eben Karsah" who was at the same address as Baturi.

24. Based on my review of bank records for four bank accounts ("Baturi Account-1," "Baturi Account-2," "Baturi Account-3," and "Baturi Account-4," collectively, the "Baturi Accounts") in the name of MUBARAK BATURI, a/k/a "Eben Karsah," the defendant, I have learned the following, in substance and in part:

a. Baturi Account-1 was opened in or about April 2014.

b. Baturi Account-2 was opened in or about October 2014.

c. Baturi Account-3 was opened in or about October 2014 in the name of BATURI d/b/a "Mubarak Baturi Shipping & Auto Expor [sic]."

d. Baturi Account-4 was opened in or about January 2015 in the name of BATURI d/b/a "Mubarak Baturi Shipping Auto Export."

e. The Baturi Accounts were each opened using a New York driver's license for BATURI with photo identification and the same ID number.

f. The address listed for each of the Baturi Accounts was the same address in the Bronx, New York (the "Baturi Address").

g. A bank account information card indicated that BATURI worked for a restaurant chain (the "Restaurant"), and the Baturi Accounts received payments from the Restaurant.

h. Between in or about October 2014 and in or about April 2015, the Baturi Accounts received a total of more than approximately \$100,000 in wire transfers from Victim-6.

i. Between in or about April 2014 and at least in or about January 2015, the Baturi Accounts received a total of more than approximately \$100,000 in wire transfers from Victim-7.

j. The Baturi Accounts reflect payments for online dating websites including Match.com, Cupid.com, and SeniorPeopleMeet.com.

k. BATURI was born in 1989 and is currently 28 years old.

1. Between in or about April 2014 and in or about May 2015, the Baturi Accounts received deposits greater than approximately \$500 that totaled approximately \$400,000, and had withdrawals greater than approximately \$500 that totaled approximately \$273,000. A majority of the deposits consisted of large wire transfers from various companies or individuals or cash deposits, and the withdrawals were largely in cash.

25. Based on my review of records regarding a bank account in the name of "Eben Karsah" (the "Karsah Account"), I have learned the following, in substance and in part:

a. The Karsah Account was opened in or about September 2016 in the name of "Eben Karsah" using a passport with a certain ID number (the "Karsah Passport."). My check of Government databases for the ID Number associated with the Karsah Passport showed that it belonged to an individual who was neither "Eben Karsah" nor MUBARAK BATURI, a/k/a "Eben Karsah," the defendant.

b. The address listed for the Karsah Account was the same as the Baturi Address.

c. The bank account information card indicated that "Eben Karsah" worked at the same Restaurant as BATURI.

d. Between in or about September 2016 and in or about December 2016, the Karsah Account received deposits greater than approximately \$500 that totaled approximately \$284,000, and had withdrawals greater than approximately \$500 that totaled approximately the same amount. A majority of the deposits consisted of large wire transfers from various companies or individuals or cash deposits, and the withdrawals were largely in cash.

26. Based on my review of records provided by the U.S. Department of Homeland Security, Immigration and Customs Enforcement, I have learned that MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, were born in Ghana.

27. Based on my review of flight records, I have learned that MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," and MUBARAK BATURI, a/k/a "Eben Karsah," the

defendants, and CC-1 traveled on the same flight from Accra, Ghana to Queens, New York on or about January 9, 2018.

28. Based on my review of records provided by the Restaurant and my correspondence with the Restaurant, I have learned the following, in substance and in part:

a. MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, as well as CC-1, have all worked at the same Restaurant location in or around Times Square in New York, New York.

b. ADAMU began working for the Restaurant in or about 2011 and is a current employee. As of in or about November 2017, ADAMU received a rate of pay of approximately \$14.25 per hour.

c. MASOUD began working for the Restaurant in or about 2008 and is a current employee. As of in or about November 2017, MASOUD received a rate of pay of approximately \$16.00 per hour.

d. BATURI began working for the Restaurant in or about 2011 and was terminated in or around September 2014. As of in or about April 2014, BATURI received a rate of pay of approximately \$12.00 per hour.

e. CC-1 began working for the Restaurant in or about February 2018 and is a current employee.

f. There is no individual with the name "Eben Karsah" that worked at the Restaurant.

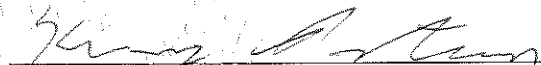


WHEREFORE, I respectfully request that a warrant be issued for the arrest of MUFTAU ADAMU, a/k/a "Muftau Adams," a/k/a "Muftau Iddrissu," PRINCE NANA AGGREY, ABDUL RASHID MASOUD, and MUBARAK BATURI, a/k/a "Eben Karsah," the defendants, and that they be arrested and imprisoned or bailed, as the case may be.



\_\_\_\_\_  
WILLIAM R. MCKEEN  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
21st day of June, 2018



\_\_\_\_\_  
THE HONORABLE HENRY B. PITMAN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK