

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

United States of America

v.

DESMOND FODJE BOBGA

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)

Case No.

20-1365m [UNDER SEAL]

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2018 to the present in the county of Beaver in the Western District of Pennsylvania, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 1349 (Fraud Conspiracy), 18 U.S.C. § 1343 (Wire Fraud), 18 U.S.C. § 505 (Forging and Counterfeiting the Seal of a Court of the United States), and 18 U.S.C. § 1028A (SEE ATTACHMENT A) (Aggravated Identity Theft).

This criminal complaint is based on these facts:
(See Affidavit in Support of Complaint)

Continued on the attached sheet.

/s/ Joseph J. Ondercin

Complainant's signature

Joseph J. Ondercin

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/30/2020

City and state: Pittsburgh, Pennsylvania

Handwritten signature of Maureen P. Kelly

Judge's signature

MAUREEN P. KELLY, U.S. MAGISTRATE JUDGE

Printed name and title

ATTACHMENT A
TO CRIMINAL COMPLAINT

Count 1: From in and around June 2018, and continuing to the present, in the countries of Romania and Cameroon and in the Western District of Pennsylvania and elsewhere, the defendant, DESMOND FODJE BOBGA, knowingly and willfully did conspire, combine, confederate, and agree with other persons to commit an offense against the United States, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

As part of the manner and means of the conspiracy, the conspirators offered puppies and other animals for sale on websites on the Internet, the conspirators communicated by wire with potential victims to induce the potential victims to purchase the puppy or other animal, the conspirators claimed that the transport of the puppy or other animal was delayed and needed additional monies to effectuate the transport, the conspirators received money directly and indirectly through wire communications from the victims, and the conspirators never delivered the puppy or other animal.

In violation of Title 18, United States Code, Section 1349.

Counts 2-10: On or about the dates set forth below, in Romania and in the Western District of Pennsylvania and elsewhere, the defendant, DESMOND FODJE BOBGA, for the purposes of executing and attempting to execute the scheme and artifice to defraud, did cause to be transmitted in foreign and/or interstate commerce, by means of a wire communication, monetary wire transfers with each wire transfer being a separate count, the following:

| Count | On or about Date of Wire | |
|--------------|---------------------------------|---|
| 2 | 3/13/2020 | The defendant, DESMOND FODJE BOBGA, caused Victim-1 to wire, via Western Union, \$950 from Rochester, |

| | | |
|----|-----------|--|
| | | Pennsylvania to Romania |
| 3 | 3/14/2020 | The defendant, DESMOND FODJE BOBGA, caused Victim-1 to wire, via Western Union, \$1500 from New Brighton, Pennsylvania to Romania |
| 4 | 3/17/2020 | The defendant, DESMOND FODJE BOBGA, caused Victim-1 to wire, via Western Union, \$2000 from Beaver Falls, Pennsylvania to Romania |
| 5 | 3/17/2020 | The defendant, DESMOND FODJE BOBGA, caused Victim-1 to wire, via Western Union, \$950 from Monaca, Pennsylvania to Romania |
| 6 | 3/19/2020 | The defendant, DESMOND FODJE BOBGA, caused Victim-1 to wire, via Western Union, \$600 from Rochester, Pennsylvania to Romania |
| 7 | 3/21/2020 | The defendant, DESMOND FODJE BOBGA, caused Victim-1 to wire, via Western Union, \$500 from New Brighton, Pennsylvania to Romania |
| 8 | 3/29/2019 | The defendant, DESMOND FODJE BOBGA, caused Victim-3 to wire, via MoneyGram, \$600 from Indiana, Pennsylvania to an individual with the initials J.J. in Maryland |
| 9 | 4/24/2019 | The defendant, DESMOND FODJE BOBGA, caused Victim-5 to wire, via MoneyGram, \$600 from Frazer Township, Pennsylvania to an individual with the initials W.M. in Virginia |
| 10 | 4/27/2019 | The defendant, DESMOND FODJE BOBGA, caused Victim-5 to wire, via MoneyGram, \$900 from Frazer Township, Pennsylvania to an individual with the initials E.B. in Florida |

In violation of Title 18, United States Code, Section 1343.

Count 11: On or about March 29, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, DESMOND FODJE BOBGA, did knowingly concur in using, that is, sending to Victim-3 located in the Western District of Pennsylvania, a forged and counterfeit seal of a court of the United States, that is, the Supreme Court of the United States, and a forged and counterfeit signature of the Clerk of the Supreme Court, a court officer, on a document purporting to have been issued by the Supreme Court of the United States for the purpose of authenticating the document, knowing such seal and signature to be forged and counterfeit, said document

claiming to guarantee the refund of \$850.00 for the safe delivery of a dog.

In violation of Title 18, United States Code, Section 505.

Count 12: On or about March 29, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, DESMOND FODJE BOBGA, during and in relation to the felony violation of wire fraud did knowingly transfer, without lawful authority, a means of identification of another person, namely, the signature of the former Clerk of the Supreme Court of the United States.

In violation of Title 18, United States Code, Section 1028A(a)(1).

of the events and circumstances described herein, knowledge obtained from my review of documents, electronic records, and other evidence related to this investigation, and knowledge gained through my training and experience. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause.

3. This Affidavit is in support of an application for a criminal complaint against and an arrest warrant for DESMOND FODJE BOBGA. As set forth herein, there exists probable cause to believe that DESMOND FODJE BOBGA has violated Title 18, United States Code, Sections 1349 (Fraud Conspiracy), 1343 (Wire Fraud), 505 (Forging Seal of Court), and 1028A (Aggravated Identity Theft).

SUBJECT IDENTIFIERS

4. DESMOND FODJE BOBGA (“FODJE BOBGA”), born in 1992, is a citizen of the Republic of Cameroon who is in the country of Romania on a visa to attend Babeş-Bolyai University in Cluj, Romania. FODJE BOBGA has a Republic of Cameroon passport, number 0864425, expiring September 19, 2023.

PROBABLE CAUSE

A. Overview

5. The FBI is investigating an internet fraud scheme wherein the criminal actors, including FODJE BOBGA and co-conspirators, advertise goods/products/items online, receive payment for the advertised goods/products/items, and intentionally do not deliver said goods/products/items. As described below, this scheme, for years, involved the purported sale of pets to the American public. The perpetrators used false and fraudulent promises and documents

regarding shipping fees, and more recently, coronavirus exposure, to extract successive payments from victims.

6. Based on my training and experience, your Affiant knows these internet fraud schemes often require the use of numerous websites and email accounts. After a website and email account are used to defraud a few individuals, the website and email account are often reported to consumer protection agencies and flagged as fraudulent. As a result, other potential consumers are able to learn that the website or email account is associated with the fraud and avoid purchasing from said website and/or email account. Thus, criminal actors involved in this type of internet fraud scheme often use a particular website and/or email account for a few customers and then create and use another website and/or email account to target new potential customers.

7. Based on my training and experience, your Affiant also knows that criminal actors involved in this type of internet fraud scheme prefer customers to pay through means that can obscure the recipient's identity to avoid law enforcement detection. As a result, criminal actors involved in this type of internet fraud scheme prefer money transfers (e.g., Western Union, MoneyGram, etc.) or cryptocurrency (e.g., Bitcoin). These criminal actors often communicate how payment should be made through electronic means with the victim customer.

8. The instant fraud scheme involves the false and fraudulent online sale of pets to American consumers. Because the fraud scheme predominately (though not exclusively) involves the sale of puppies, it is often known as a pet adoption scam or puppy scam. Specifically, the individuals created websites to advertise puppies or other animals for sale, communicated with potential customers, obtained payment for alleged sale, and provided nothing in return. Using multiple telephone numbers and email accounts, including (434) 214-8514 and unitedpetsafe2009@gmail.com, FODJE BOBGA sent electronic communications, through

interstate and/or foreign commerce, to hundreds of target victims across the United States. Some of those communications contained false and fraudulent representations to induce the target victims to pay hundreds of dollars for a puppy. (Attached exhibit 1 and exhibit 2 are screenshots of a website to which FODJE BOBGA directed numerous targeted victims to view puppies that he fraudulently claimed to sell. Exhibit 1 is a screenshot of the website as it fits in the web browser when initially accessed. Exhibit 2 captures the entire selection of advertised puppies at the time that your Affiant inspected the website). Other communications contained false and fraudulent representations to induce victims who had already paid for the “puppy” to send hundreds, and sometimes thousands, of additional dollars in “refundable fees” relating to the puppy’s shipping, vaccination, and coronavirus quarantine. FODJE BOBGA directed some of those payments to be sent in his own name. He directed some other payments to be sent in the names of fellow African students in Romania.

9. As part of this investigation, your Affiant has interviewed a number of victims and potential victims of this puppy scam. Based on international and/or interstate electronic communications obtained in this investigation, from June 2018 to the present, FODJE BOBGA and his co-conspirators communicated with these victims and potential victims to fraudulently induce them to send money, through international and or interstate wires, for puppies or other animals that were never delivered. A few of the victims are highlighted below.

B. Victim-1

10. On two occasions, with the most recent being May 6, 2020, your Affiant interviewed Victim-1, a resident of New Brighton, Pennsylvania, which is located in the Western District of Pennsylvania.

11. In March 2020, Victim-1 performed an internet search for a puppy to purchase for

her mother. Victim-1 came upon a web site offering mini dachshunds for sale where she submitted a form requesting information. On approximately March 11, 2020, Victim-1 was contacted by text message from the phone number (832) 843-9680 from an individual purportedly named "Hector CANTU." "CANTU" indicated that the dog, purportedly named "Pansy," was still available and that the price would be \$500 to include shipping, which later changed to \$600. As instructed by "CANTU," Victim-1 obtained \$600 in Walmart gift cards and sent pictures of the cards with the PIN number exposed to "CANTU." Victim-1 sent these pictures by text message from her phone, which was located in the Western District of Pennsylvania, to the phone number (832) 843-9680.¹

12. Victim-1 then received an email from the email account dachshundshome99@gmail.com containing a Transfer of Ownership document. Victim-1 was informed that Pansy would be shipped by plane through an entity called "Pets Fly America" from Houston, Texas to Pittsburgh, Pennsylvania with an expected arrival date of March 13, 2020. Dachshundshome99@gmail.com provided Victim-1 with a tracking number for Pets Fly America's website that allegedly allowed her to monitor the status of Pansy's transport.

13. Victim-1 then received text messages from an unnamed subject at phone number (434) 214-8514 indicating that the subject was involved in the shipping of the puppy. According to the text messages, the sender claimed that several issues came up with the transport of Pansy which resulted in the dog being stopped over in Oklahoma. According to the sender, one of the issues included Pansy being quarantined due to being exposed to COVID-19 on the flight. As a result, the sender indicated that Victim-1 needed to send additional fees to ensure Pansy's safe transport including the need for an air conditioned shipping crate and insurance fees. The false

¹ The area code (832) is associated with the Houston, Texas area.

representations contained in these text messages induced Victim-1 to send numerous international wire transfer payments through Western Union, from locations in the Commonwealth of Pennsylvania to receivers located in the country of Romania, in the hopes of having Pansy transported safely. The below chart lists some of these international wires. Ultimately, no dog arrived, and Victim-1 received no refund.

| Amount | Sent Date | Sent Location | Receive Date | Receive Loc. | Receive Initials |
|---------------------|-----------|------------------|--------------|--------------|------------------|
| \$950 | 3/13/20 | Rochester, PA | 3/14/20 | Romania | A.L.F. |
| \$1500 | 3/14/20 | New Brighton, PA | 3/15/20 | Romania | N.G.N. |
| \$2000 ² | 3/16/20 | Rochester, PA | 3/16/20 | Romania | E.N.C. |
| \$2000 | 3/17/20 | Beaver Falls, PA | 3/17/20 | Romania | B.T.N. |
| \$950 | 3/17/20 | Monaca, PA | 3/18/20 | Romania | B.T.N. |
| \$600 | 3/19/20 | Rochester, PA | 3/19/20 | Romania | V.T.F. |
| \$500 | 3/21/20 | New Brighton, PA | 3/21/20 | Romania | M.G.A. |

14. As part of this investigation, law enforcement obtained, by search warrant, Google records associated with the email account joebah77@gmail.com.

15. According to Google subscriber records, the joebah77@gmail.com account uses Google Voice, which is a voice-over-internet-protocol (“VoIP”) product that provides calling and text messaging services for customers through their Google accounts. Specifically, joebah77@gmail.com uses Google Voice with a user phone number of (434) 214-8514. As part of the records provided, Google provided over 12,000 inbound and outbound text messages for the Google Voice phone number (434) 214-8514, including over 900 text messages that were exchanged with Victim-1’s phone number between March 13, 2020, and March 21, 2020, that fraudulently induced Victim-1 to lose \$9,100.

² This transaction was sent by Victim-1’s friend on her behalf.

16. Google subscriber records for email account joebah77@gmail.com also listed a recovery email of fodjebobga1@gmail.com. Based on my training and experience, your Affiant knows that a recovery email is a method by which an account user can be reached to, among other things, recover access to an account when the user forgets the account password. Based on my training and experience, your Affiant knows that an account and its recovery email are likely controlled by the same person and/or organization.

17. As part of this investigation, law enforcement obtained, by search warrant, Google records associated with the email account fodjebobga1@gmail.com. Those records show the user of the fodjebobga1@gmail.com email account to be FODJE BOBGA in the following ways, among others:

a. The contents of the fodjebobga1@gmail.com email account included numerous emails relating to FODJE BOBGA's attendance of Babeş-Bolyai University. An email sent from fodjebobga1@gmail.com, dated October 2, 2019, related to his admission at the University contained numerous attachments, including a photograph of FODJE BOBGA's Cameroonian passport and FODJE BOBGA's letter of acceptance to Babeş-Bolyai University from the Romanian Ministry of National Education.

b. An email was sent from fodjebobga1@gmail.com, dated February 21, 2020, to an email address with the domain for a Romanian bank. The message indicated that the user's name was Fodje Bobga Desmond, who was trying to open an account. Attached to the message was a copy of a Taxpayer's Card from the Republic of Cameroon in the name of Desmond Fodje Bobga.

c. An email sent from fodjebobga1@gmail.com, dated March 11, 2020, stated that the user was "Fodje Bobga Desmond," as "the representative of the African students." The

message provided a list of the names of other classmates. Two of those names appear to match the names of two of the receivers to whom (434) 214-8514 had directed Victim-1 to send money. (The money transfer to one of them is reflected on the above chart under the initials V.T.F. Victim-1's attempted payment to the other was unsuccessful.)

d. An email was sent from fodjebobga1@gmail.com, dated March 21, 2020, to an email address with the domain for Babeş-Bolyai University, relating to "covid19." The message stated that the sender was Fodje Bobga Desmond from Cameroon, was a political science student, and was going to remain in Cluj.

18. The Google photos archive for fodjebobga1@gmail.com contained two images of interest. First, in a folder named "2020-01-08-10," was a photo containing a picture of a Cameroonian passport. The second, in a folder named "2020-01-13," contained a picture of a Universitatea Babeş Bolyai social service ID card. The two names on the two depicted documents appear to match the names of two other listed receivers of fraudulently obtained funds from Victim-1, as reflected in the above chart under the initials A.L.F. and E.N.C., respectively.

C. Victim-2

19. On May 7, 2020 your Affiant interviewed Victim-2, who is a resident of Fruitland, Iowa.

20. In March 2020, Victim-2 was searching online to purchase a puppy for herself. Victim-2 came upon a web site offering mini dachshunds for sale where she submitted a form requesting information. On approximately March 4, 2020, Victim-2 was contacted by text message from the phone number (832) 843-9680 from an individual purportedly named "Hector CANTU." "CANTU" indicated that the puppy, purportedly named "Tina," was still available and that the price would be \$600 with shipping. On March 5, 2020, Victim-2 made a \$300 deposit.

As instructed by "CANTU," Victim-2 obtained \$300 in Walmart gift cards and sent pictures of the cards with the PIN number exposed to "CANTU."

21. On March 6, 2020, Victim-2 received an email from the email account dachshundshome99@gmail.com containing a Transfer of Ownership document for Tina that needed to be signed and returned, which Victim-2 did. On March 9, 2020, by text messages, "CANTU" provided a tracking number that allegedly can be used on the Pets Fly America website to monitor the status of Tina's transport. On March 9, 2020, Victim-2 made the remaining \$300 payment. As instructed by "CANTU," Victim-2 obtained \$300 in Walmart gift cards and sent pictures of the cards with the PIN number exposed to "CANTU." However, "CANTU" advised that the Walmart gift cards were not activated. As a result, on the same date, Victim-2 sent an additional \$300 by Zelle, which is a digital payment system that is associated with numerous U.S. banks, to an account associated with the email address jordonjamerson@gmail.com.

22. After this payment was made, Victim-2 received an email from petsflyamerica@outlook.com advising that the puppy had arrived in Chicago, Illinois. The email advised that the puppy was lacking the appropriate insurance coverage, which required a \$950 refundable payment. On March 10, 2020, Victim-2 made the \$950 payment through PayPal, an electronic payment system, to a PayPal account associated with the email address of infosalesdepartment@fastservice.com. Victim-2 received an email indicating that an individual named Desmond Fodje Bobga refunded this PayPal transaction with the use of a PayPal account associated with the email address lovelyteacupchihuahua1@gmail.com. According to Victim-2, she was informed that there was an issue with the PayPal transaction that caused this refund, and that she must send payment by wire transfer through Western Union. On March 12, 2020, Victim-

2 sent, from Iowa, a wire transfer through Western Union in the amount of \$950 to an individual named Desmond Fodje Bobga with a destination of Romania.

23. Subsequent to this payment, Victim-2 continued communication with the email account petsflyamerica@outlook.com. In addition, Victim-2 communicated by text message with the phone number (434) 214-8514 concerning the shipment of Tina. On March 12, 2020, Victim-2 received another email from petsflyamerica@outlook.com asserting that an additional \$890 was needed for vaccines and an AC crate, which would be refunded to Victim-2 upon delivery of the puppy. On March 12, 2020, Victim-2 sent, from Iowa, a wire transfer through Western Union in the amount of \$890 to an individual named Desmond Fodje Bobga with a destination of Romania.

24. Subsequent to this payment, the Victim-2 received an additional email from petsflyamerica@outlook.com asserting that another \$1,500 was needed for a USDA (United States Department of Agriculture) pet and livestock permit, which would be fully refunded to Victim-2 upon delivery. At this point, Victim-2 refused to make any additional payment and requested a refund. Victim-2 has not received any refund for the fees paid, and no dog was delivered.

25. On May 7, 2020, your Affiant reviewed the tracking number provided to Victim-2 for Tina on the web site www.petsflyamerica.com. According to the website associated with this tracking number, the shipper was listed as Hector CANTU of Rosenberg, Texas with the phone number of (832) 843-9680 and an email address of dachshundshome99@gmail.com. The shipment information indicated that a female dachshund puppy named Tina was being shipped by air freight to Victim-2 in Iowa with an expected arrival date of March 9, 2020.

26. As discussed above, pursuant to a search warrant, Google provided records associated with the Google Voice number (434) 214-8514. Among the inbound and outbound text messages for Google Voice phone number (434) 214-8514 were over 100 text messages that were

exchanged with Victim-2's phone number between March 9, 2020, and March 15, 2020, that fraudulently induced Victim-2 to lose \$1,840.

27. Also, as discussed above, the Google subscriber records for email account joebah77@gmail.com listed a recovery email of fodjebobga1@gmail.com. According to Google records, the fodjebobga1@gmail.com email account was linked by shared cookie to lovelyteacupchihuahual@gmail.com. Based on my training and experience, your Affiant knows that a cookie is data issued by a website and then stored on a user's computer that is recognized by the issuer (e.g., Google) when a computer visits that particular website or logs into an account associated with the issuer. Through the use of cookies, Google can identify various Google accounts that have been accessed by the same electronic device(s). Oftentimes, shared cookies amongst email accounts are evidence that the same person or organization controls the email accounts. Because fodjebobga1@gmail.com and lovelyteacupchihuahual@gmail.com are linked by a shared cookie, the two email accounts were accessed by the same electronic device.- The shared cookies link and the recover email link among the fodjebobga1@gmail.com, joebah77@gmail.com, and lovelyteacupchihuahual@gmail.com accounts establishes probable cause that these email accounts are controlled by the same individual, that is, FODJE BOBGA.

28. Moreover, outbound text messages from the Google Voice number (434) 214-8514 directed two other puppy scam victims to make PayPal payments to "Desmond Fodje" at lovelyteacupchihuahual@gmail.com.

D. Victim-3

29. On April 1, 2020, your Affiant interviewed Victim-3, a resident of Marion Center, Pennsylvania, which is located in the Western District of Pennsylvania.

30. In March 2019, Victim-3 searched the Internet for a tea cup Chihuahua in hope of

finding a pet to purchase. Victim-3 located a puppy on a web site and submitted a form requesting additional information. Victim-3 was contacted by email and was provided a phone number for contact. She agreed to purchase a tea cup Chihuahua for \$600. Based on the instructions that she was provided, on March 29, 2019, Victim-3 sent, from the Indiana, Pennsylvania, a wire transfer through MoneyGram in the amount of \$600 to an individual named John Jefferson with a destination of Maryland.

31. After making this payment, Victim-3 was contacted by email. This email claimed to be involved in the shipment of the Chihuahua and claimed that an additional \$800 payment was necessary for the shipping of her puppy. Victim-3 was suspicious of this email and refused to send additional money. Victim-3 did not receive any refund for fees paid, and no dog was delivered.

32. As part of this investigation, law enforcement obtained, by search warrant, Google records associated with the Google Voice telephone number (434) 298-4502 and the email account unitedpetsafe2009@gmail.com.

33. Google Voice records for (434) 298-4502 show three calls with Victim-3's telephone number on March 29, 2019. According to the Google records for the unitedpetsafe2009@gmail.com email account, this account was used to communicate with Victim-3 concerning the false transport of a tea cup Chihuahua puppy. Specifically, there was a March 29, 2019 email from unitedpetsafe2009@gmail.com to Victim-3 with the subject line “* URGENT CRATE AND VACCINE NEEDED FOR YOUR FEMALE TEACUP CHIHUAHUA PUPPY SNOW WHITE *.” The message contained a header of United Petsafe Shippers. The body of the email, addressed to Victim-3, claimed that an additional \$850 refundable fee would be needed for an AC ventilated crate and vaccine service for the puppy in order to facilitate the air transport. The fees would supposedly be refunded upon pickup of the puppy at the airport. Attachments to the

email included pictures of pet transport crates. The email was signed “Manager United PetSafe Richard Liffon TEL: (361) 441-0347.”

34. Also attached to the email from unitedpetsafe2009@gmail.com to Victim-3 was a document entitled, “Refundable Crate and Vaccine Guarantee Document.” The document purported to have been issued by the “Supreme Court of the United States of America” and bore the seal of the Court, along with the signature of “William K. Suter,” as Clerk of the Court. Dated March 29, 2019, the document claimed that “with the pyramid insurance in affiliation with supreme court of the United States of America (USA) and the (USDA) ensures the refunds of 850.00USD to [name of Victim-3] and safe delivery of her female teacup Chihuahua puppy in question at her home address.”

35. From my review of information on the official website of the Supreme Court, your Affiant knows that William K. Suter was the 19th Clerk of the Court and that he retired in 2013. The Clerk of the Supreme Court has since been Scott S. Harris. Therefore, the document bears a forged or counterfeit seal of the Supreme Court and a forged or counterfeit signature (i.e., a means of identification) of the Clerk of the Court. Additionally, the document was forged and counterfeited for the purpose of falsely authenticating the document and the demand for \$850.00.

36. Also located in the mailbox of unitedpetsafe2009@gmail.com was an unsent draft email that was dated March 17, 2020. This draft email contained the name, address, phone, and email address of Victim-1 as well as the name (i.e., “Hector Cantu”), address, phone number, and email address of the purported seller of the puppy to Victim-1.

37. Google subscriber records for email account unitedpetsafe2009@gmail.com list a recovery email of fodjebobgal@gmail.com. Thus, fodjebobgal@gmail.com is the recovery email for both unitedpetsafe2009@gmail.com and joebah77@gmail.com. Again, based on my training

and experience, your Affiant knows that a recovery email is a method by which an account user can be reached to, among other things, recover access to an account when the user forgets the account password. Based on my training and experience, your Affiant knows that an account and its recovery email are likely controlled by the same person and/or organization. In this case, that individual is FODJE BOBGA.

38. Additional evidence demonstrates that the unitedpetsafe2009@gmail.com email address is used by FODJE BOBGA. A message dated approximately October 2, 2019, was sent from unitedpetsafe2009@gmail.com to fodjebobga1@gmail.com and contained a pdf titled, “confirmation FODJE BOBGA DESMOND.pdf.” The document was a confirmation letter, dated September 16, 2019, from Babeş-Bolyai University in Romania, for FODJE BOBGA to attend Babeş-Bolyai University.

39. Furthermore, IP addresses associated with fodjebobga1@gmail.com, joebah77@gmail.com, and unitedpetsafe2009@gmail.com are consistent with FODJE BOBGA’s Cameroonian origin and current stay in Romania. For example, on or about April 8, 2020, fodjebobga1@gmail.com and unitedpetsafe2009@gmail.com were accessed, within six seconds of each other, from the same IP address, which based on an IP address lookup is assigned to Babeş-Bolyai University. On or about February 14, 2020, fodjebobga1@gmail.com, joebah77@gmail.com, and unitedpetsafe2009@gmail.com were all accessed, within a ten-second period, from the same IP address, which based on an IP address lookup is assigned to a Romanian telecommunications provider. Similarly, on or about January 10, 2020, all three email accounts were accessed, within a 38-second period, from the same IP address, which based on an IP address lookup is assigned to a Romanian telecommunications provider. And on or about October 12, 2019, all three email accounts were accessed at the same time from the same IP address, which

based on an IP address lookup is assigned to a Cameroonian telecommunications provider.

E. Victim-4

40. The telephone number (361) 441-0347, which was in the signature block of the fraudulent email sent from unitedpetsafe2009@gmail.com to Victim-3 on March 29, 2019, as discussed above, appears to be controlled by a co-conspirator of FODJE BOBGA. As described below, FODJE BOBGA and the co-conspirator joined together to defraud another victim referred to below as "Victim-4."

41. On June 5, 2020, your Affiant interviewed Victim-4, a resident of Dallas, Texas.

42. In February 2020, Victim-4 and his girlfriend were looking to purchase a dog. The girlfriend located a website and completed a form to get more information. Victim-4 and his girlfriend had contact with telephone number (434) 214-8514, which was the individual that was allegedly selling the dog. The pair agreed upon a dog named Snow White. Victim-4 communicated with (434) 214-8514 to complete the sale transaction and used PayPal to send approximately \$950.

43. The seller claimed to use a service named Pets Fly America for shipment and provided a web site and tracking number. Thereafter, Victim-4 was contacted by a second number, (361) 441-0347, alleged to be the shipper of the dog. This alleged shipper claimed that issues arose in the shipment of the dog and requesting an additional \$850 was needed for a health certificate. Victim-4 paid the amount via Zelle to a person with the initials R.P. Thereafter, this alleged shipper informed Victim-4 that the payment did not go through due to the wrong name being listed. Victim-4 confirmed with his bank that the payment was successful, but the alleged shipper insisted the payment needed to be resent with the proper name. In an effort to resolve any issues concerning the sale and transport of the dog, Victim-4 started a group text to the two phone

numbers that he communicated with concerning the dog, which were the phone numbers (434) 214-8514 and (361) 441-0347. Victim-4 refused to resend the \$850 payment. Ultimately, no dog was delivered and no refund was received.

44. As discussed above, pursuant to a search warrant, Google provided records for Google Voice number (434) 214-8514. Among the inbound and outbound text messages for Google Voice phone number (434) 214-8514 were over 100 text messages that were exchanged with Victim-4's phone number between February 26, 2020, and February 28, 2020, that fraudulently induced Victim-4 to lose \$1,500.

45. Also among the text messages for Google Voice phone number (434) 214-8514 was a group conversation on February 28, 2020, with Victim-4's phone number and (361) 441-0347, wherein Victim-4 inquired about the excuses for non-delivery of the puppy. FODJE BOBGA, through (434) 214-8514, falsely claimed delay due Victim-4's bank, writing, "i have been totally confused stressed up. being accused for something i do not know." The response from (361) 441-0347 to Victim-4 was, "Can you be patient so we get this sorted out?"

46. Separately, call detail records for Google Voice phone number (434) 214-8514 show five calls from (361) 441-0347. One call, on March 14, 2020, lasted 33 seconds. Four calls in April 2020 were missed. These circumstances indicate that (361) 441-0347 was controlled by a subject other than FODJE BOBGA, as part of and in furtherance of their joint puppy scam.

F. Victim-5

47. On May 28, 2020 and June 9, 2020, your Affiant interviewed Victim-5, a resident of Cheswick, Pennsylvania, which is located in the Western District of Pennsylvania.

48. In April 2019, Victim-5 searched online to purchase a chihuahua and located a web site offering a dog named Bentley for sale. Victim-5 sent a request for more information via email

and provided her contact phone number. Victim-5 was contacted by telephone number (434) 298-4502 and an agreement was made to purchase Bentley for \$600. Based on the alleged seller's instructions, on approximately April 24, 2019, Victim-5 sent \$600 via MoneyGram from a Walmart in Frazer Township, Pennsylvania to a person with the initial F.R. in the Commonwealth of Virginia. Upon being informed by the seller that there was a problem with the payment, Victim-5 cancelled the original payment. On approximately April 24, 2019, Victim-5 sent a new payment of \$600 via MoneyGram from a Walmart in Frazer Township, Pennsylvania to a person with the initials W.M. in Virginia.

49. Thereafter, Victim-5 was contacted by the alleged shipper through text and voice call from telephone number (361) 441-0347. The alleged shipper claimed that transportation issues arose and indicated that a payment of \$900 was needed to provide a special cage for the dog to breathe in cargo transport. Pursuant to the alleged shipper's instruction, on April 27, 2019, Victim-5 sent \$900 via MoneyGram from a Walmart in Frazer Township, Pennsylvania to another individual in Pennsylvania. Based on an unknown issue reported by the alleged shipper, the payment had to be resent. On April 27, 2019, Victim-5 sent \$900 via MoneyGram from a Walmart in Frazer Township, Pennsylvania to an individual with the initials E.B. in the State of Florida. Subsequently, Victim-5 received a text from an unknown number indicating that a USDA permit was needed for the chihuahua puppy at a cost of \$650-\$2,200. Victim-5 refused to provide any additional payments and confronted the alleged shipper by phone. Nevertheless, no dog was delivered and no refund was provided.

50. As discussed above, pursuant to a search warrant, Google provided records for Google Voice number (434) 298-4502. Among the nearly 20,000 inbound and outbound text messages for (434) 298-4502 were over 100 messages exchanged with Victim-5's phone number

between April 21, 2019, and April 27, 2019, that induced Victim-5 to lose \$1,500.

G. Victim-6

51. On May 29, 2020, your Affiant interviewed Victim-6, a resident of Pittsburgh, Pennsylvania, which is located in the Western District of Pennsylvania.

52. Victim-6 was searching on-line to purchase a puppy in early January 2020 and located a website that advertised multiple available dogs for sale. Victim-6 requested more information from the website concerning a puppy. Victim-6 was contacted by the alleged seller and had contact via telephone and text. Victim-6 became suspicious of the alleged seller based upon the communications and did not send any payments.

53. As discussed above, pursuant to a search warrant, Google provided records for Google Voice number (434) 214-8514. Among the inbound and outbound text messages for Google Voice phone number (434) 214-8514 were 55 text messages that were exchanged with Victim-6's phone number between January 23, 2020, and January 24, 2020, that attempted to induce Victim-6 to pay for a "puppy."

CONCLUSION

54. Based on the above information, your Affiant submits that probable cause exists that DESMOND FODJE BOBGA has violated Title 18, United States Code, Sections 1349 (Fraud Conspiracy), 1343 (Wire Fraud), 505 (Forging Seal of Court), 1028A (Aggravated Identity Theft).

The above information is true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

/s/ Joseph J. Ondercin

Joseph J. Ondercin
Special Agent,
Federal Bureau of Investigation

Subscribed and sworn to before me
this 30th day of June, 2020



MAUREEN P. KELLY
United States Magistrate Judge

AVAILABLE PUPPIES

- All our Chihuahua Puppies On Sale come with the following
- => Health Certificate
 - => De-worming
 - => Shots to date
 - => Registration Papers
 - => Dog Training
 - => Health Guarantee
- ****WE'VE MADE OUR PUPPIES AFFORDABLE, NOT CHEAP****

50% OFF



Name. . . Nora
Current Status: Available
Gender: Female
Age: 10 Weeks
Price : \$450
All Breed Registration papers,FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys.Current on
shots/vaccines and deworming.

Contact Us



Name. Teeny Lily
Current Status: Available
Gender: Female
Age: 9 Weeks
Price : \$450
All Breed Registration papers,FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys.Current on
shots/vaccines and deworming.

Contact Us

EXHIBIT 1



Name. . . Nora
Current Status: Available
Gender: Female
Age: 10 Weeks
Price : \$450
All Breed Registration papers,FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys.Current on
shots/vaccines and deworming.

Contact Us



Name. Teeny Lily
Current Status: Available
Gender: Female
Age: 9 Weeks
Price : \$450
All Breed Registration papers,FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys.Current on
shots/vaccines and deworming.

Contact Us

EXHIBIT 2



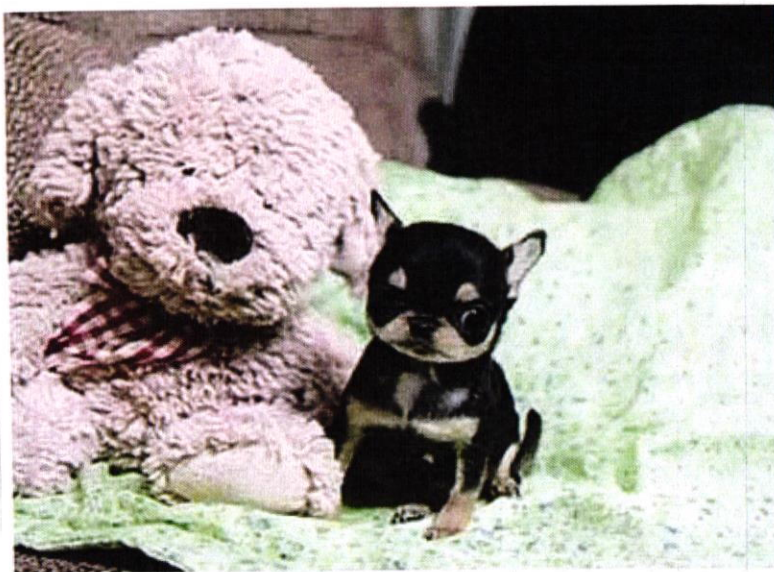
Name: Snow White
Current Status: Available
Gender: Female
Age: 9 Weeks
Price : \$450
All Breed Registration papers, FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys. Current on
shots/vaccines and deworming.

[Contact Us](#)



Name Bentley
Current Status: Available
Gender: Male
Age: 9 Weeks
Price : \$450
All Breed Registration papers, FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys. Current on
shots/vaccines and deworming.

[Contact Us](#)



Name : Bentley
Current Status: Available
Gender: Male
Age: 9 Weeks
All Breed Registration papers,FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys.Current on
shots/vaccines and deworming.

[Contact Us](#)



Name. . .Leo .
Current Status: Available
Gender: Male
Age: 10 Weeks
Price : \$450
All Breed Registration papers,FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys.Current on
shots/vaccines and deworming.

[Contact Us](#)



Name: Panda
Current Status: Available
Gender: Male
Age: 8 Weeks
Price : \$450
All Breed Registration papers, FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys. Current on
shots/vaccines and deworming.

[Contact Us](#)



Name : Tommy
Current Status: Available
Gender: Male
Age: 10 Weeks
Price : \$450
All Breed Registration papers, FULL
Registration, Pedigree, Health record, 1 year
health guarantee, Health certificate, puppy
traveling crate and play toys. Current on
shots/vaccines and deworming.

[Contact Us](#)



Age: 9 Weeks

Price : \$450

All Breed Registration papers, FULL Registration, Pedigree, Health record, 1 year health guarantee, Health certificate, puppy traveling crate and play toys. Current on shots/vaccines and deworming.

[Contact Us](#)



Name: Dan and Melody

Status: Available

Gender: Female and Female

Age: 9 Weeks

Price : \$450

All Breed Registration papers, FULL Registration, Pedigree, Health record, 1 year health guarantee, Health certificate, puppy traveling crate and play toys. Current on shots/vaccines and deworming.

[Contact Us](#)