AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20) ☐ Original ☐ Duplicate Original

UNITED STATES DISTRICT COURT

for the

Central District of California

United States of America

v.

RAMON OLORUNWA ABBAS,
aka "Ray Hushpuppi,"
aka "Hush,"
aka "Malik,"
ABDULRAHMAN IMRAAN JUMA,
aka "Abdul,"
aka "Rahman,"
VINCENT KELLY CHIBUZO,
aka "Kelly,"
ABBA ALHAJI KYARI,
RUKAYAT MOTUNRAYA FASHOLA,
aka "Morayo,"
BOLATITO TAWAKALITU AGBABIAKA,
aka "Bolamide,"

Defendants

Case No. 2:21-mj-00760-DUTY

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

Beginning no later than November 12, 2019 and continuing through at least April 26, 2020, in the county of Los

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AUSAs: Anil J. Antony, x6579 REC: Detention

Angeles, in the Central District of California, and elsewhere, the defendants conspired to defraud, and launder proceeds obtained from, a victim, in violation of:

Code Section	*Offense Description*
18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud
18 U.S.C. § 1956(h)	Conspiracy to Engage in Money Laundering

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Andrew John Innocenti, Special Agent, FBI
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: *February 12, 2021*

Patricia Donahue
Judge's signature

City and state: Los Angeles, California

Hon. Patricia Donahue, U.S. Magistrate Judge
Printed name and title

AUSAs: Anil J. Antony, x6579

REC: Detention

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AFFIDAVIT

I, ANDREW JOHN INNOCENTI, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since approximately March 2015. I am currently assigned to the Los Angeles Field Office, High-Tech Organized Crime Squad, where I primarily investigate cyber-enabled fraud and business email compromise ("BEC") schemes. Between approximately August 2015 and December 2018, I was assigned to a cyber-crime squad in the Chicago Field Office, where I investigated cyber-related crimes, including BEC cases. During my career as an FBI Special Agent, I have participated in numerous computer-crime investigations. In addition, I have received both formal and informal training from the FBI and other institutions regarding computer-related investigations, computer technology, and white-collar fraud.

2. This affidavit is made in support of a criminal complaint against, and arrest warrants for, RAMON OLORUNWA ABBAS, also known as ("aka") "Ray Hushpuppi," aka "Hush," aka "Malik" ("ABBAS"), and the following persons who conspired with ABBAS and each other to fraudulently obtain and launder at least $1,124,426.36 from a victim:

a. ABDULRAHMAN IMRAAN JUMA, aka "Abdul," aka "Rahman" ("JUMA"), of Kenya;

b. VINCENT KELLY CHIBUZO, aka "Kelly" ("CHIBUZO"), of Nigeria;

c. ABBA ALHAJI KYARI ("KYARI"), a Deputy Commissioner of the Nigeria Police Force;

d. RUKAYAT MOTUNRAYA FASHOLA, aka "Morayo" ("FASHOLA"), of New York State; and

e. BOLATITO TAWAKALITU AGBABIAKA, aka "Bolamide" ("AGBABIAKA"), of New York State (collectively, with ABBAS, the "Defendants").

3. The criminal complaint charges the Defendants with violations of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) and 18 U.S.C. § 1956(h) (Conspiracy to Engage in Money Laundering).

4. The facts set forth in this affidavit are based upon my personal involvement in this investigation, my review of reports and other documents related to this investigation, my training and experience, and information obtained from other agents, law enforcement officers and employees, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of the government's investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only. Unless specifically indicated otherwise, all dates set forth below are "on or about" the dates indicated, and all amounts or sums are approximate.

II. SUMMARY OF PROBABLE CAUSE

5. ABBAS is a Nigerian national who previously resided in the United Arab Emirates (the "U.A.E."). ABBAS' social media accounts—on which he was known by the moniker "Ray Hushpuppi" or variations of that name—frequently showed him in designer clothes, wearing expensive watches, and posing in or with luxury cars and charter jets. Online articles in Nigeria suggested for several years

that ABBAS was involved in fraud,[1] and, in fact, multiple articles identified him as one of the most prolific Nigerian-origin fraudsters in the world.[2] The FBI's investigation confirmed that ABBAS' opulent lifestyle was financed through crime, and that he was one of the leaders of a transnational network committing computer crime and fraudulent schemes (including BEC schemes),[3] and money laundering from those offenses, targeting victims around the world. ABBAS was charged by Complaint and then Information, in Case. No. 2:20-CR-00322-ODW, for conspiring in a cyber-heist from a bank in Malta and several BEC schemes, and money laundering relating to those schemes.

6. In addition to that charged conduct, messages obtained from ABBAS' phone and online accounts pursuant to federal search warrants, combined with bank records, other records, and information from victims, indicate that ABBAS and the other Defendants participated in a scheme to defraud a person (the "Victim Businessperson") who was seeking a lender to invest $15 million in a project to

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[1] See, e.g., TechCity, The Unmasking of Hushpuppi and Why We All Should Be Worried, July 31, 2017, https://www.techcityng.com/unmasking-hushpuppi-worried/ (last visited Feb. 11, 2021); Legit.ng, What Does Hushpuppi Do for a Living?, Dec. 5, 2018, https://www.legit.ng/1207409-what-hushpuppi-a-living.html (last visited Feb. 11, 2021)

[2] See, e.g., WithinNigeria.com, The Richest Yahoo Boy in Nigeria 2019, Feb. 17, 2019, https://www.withinnigeria.com/2019/02/17/who-is-the-richest-yahoo-boy-in-lagos-2019/ (last visited Feb. 11, 2021); Top 10 Richest Yahoo Boys in Nigeria, Jist Nigeria, August 29, 2019, https://jistnaija.com/top-10-richest-yahoo-boys-in-nigeria/ (last visited Feb. 11, 2021).

[3] BEC fraud schemes often involve a computer hacker gaining unauthorized access to a business-email account, blocking or redirecting communications to and/or from that email account, and then using the compromised email account or a separate fraudulent email account (sometimes called a "spoofed" email account) to communicate with personnel from a victim company and to attempt to trick them into making an unauthorized wire transfer. The fraudster will direct the unsuspecting personnel of the victim company to wire funds to the bank account of a third party (sometimes referred to as a "money mule"), which is often a bank account owned, controlled, and/or used by individuals involved in the scheme based in the United States. The money may then be laundered by wiring or transferring it through numerous bank accounts to launder the money, or by quickly withdrawing it as cash, by check, or by cashier's check.

build an international school in Qatar (the "Qatari Victim Company"). The scheme defrauded the Victim Businessperson of more than $1.1 million.

7. JUMA and ABBAS interacted directly with the Victim Businessperson; JUMA claimed to own a company in Kenya that would provide the loan, while ABBAS pretended to be "Malik," a banker at Wells Fargo in the United States, who was purportedly facilitating the loan payment. CHIBUZO was involved in creating a fraudulent website and automated phone line that would convince the Victim Businessperson that the $15 million loan had been secured. In the course of the scheme, the Victim Businessperson made multiple payments purportedly for taxes and other fees, which JUMA and ABBAS told the Victim Businessperson were necessary to secure the loan.

8. At the time ABBAS joined the conspiracy, JUMA had already defrauded the Victim Businessperson of approximately $314,442.78 in early December 2019. After ABBAS joined the conspiracy that month, JUMA and ABBAS received and laundered additional funds in a variety of ways with the assistance of other coconspirators. AGBABIAKA and FASHOLA were among the coconspirators who assisted ABBAS in receiving and laundering funds.

9. Among those payments, ABBAS convinced the Victim Businessperson to make wire transfers of $230,000 to a Wells Fargo bank account of a luxury watch-seller and $100,000 to a Capital One bank account of AGBABIAKA in late December 2019.

a. ABBAS used the wire transfer of $230,000 to purchase a luxury Richard Mille RM11-03 watch. ABBAS arranged for the watch seller in Florida (the "Florida Watch Seller") to ship the watch to the New York metropolitan area, where AGBABIAKA and FASHOLA picked it up and ultimately delivered it to a coconspirator, who was a relative of FASHOLA. ABBAS then directed that person to transport the watch on a flight from John F. Kennedy International

Airport ("JFK") in New York to the U.A.E., where that person hand-delivered the watch to ABBAS on about January 4, 2020. ABBAS posted a photograph of himself on Instagram wearing the watch, with the hashtag "#Rm1103," on January 13, 2020.

b. As to the $100,000 wire transfer to AGBABIAKA, ABBAS directed AGBABIAKA to withdraw the funds and convert a portion of them—minus $8,000 for AGBABIAKA, which was her cut—to Nigerian Naira, the currency of Nigeria, which she then provided to coconspirators who would deliver the funds to ABBAS. AGBABIAKA also laundered funds at ABBAS' request by sending cashier's checks totaling $50,000 to a coconspirator who would use the funds to fraudulently obtain St. Christopher and Nevis ("St. Kitts") citizenship and a passport for ABBAS. ABBAS received the passport in February 2020.

10. Between approximately January 8, 2020 and February 4, 2020, JUMA and ABBAS each corresponded with the Victim Businessperson, attempting to fraudulently induce the Victim Businessperson to pay $575,000 in purported "taxes" to release the $15 million loan that the Victim Businessperson was expecting. Between February 5 and 7, 2020, the Victim Businessperson wire transferred $299,983.58 to bank accounts under JUMA's control.

11. CHIBUZO's messages to ABBAS during that time show that he was unhappy with the amount that, and/or speed with which, ABBAS was paying him, so he contacted the Victim Businessperson directly. CHIBUZO told the Victim Businessperson that JUMA and ABBAS were "fake," in an attempt to convince the Victim Businessperson to stop making fraudulent payments to ABBAS and JUMA, and to make fraudulent payments to him instead. When JUMA and ABBAS learned of CHIBUZO's interference, ABBAS arranged to have KYARI—a highly decorated Deputy Commissioner of the Nigeria Police Force—arrest CHIBUZO for interfering with the fraud scheme. ABBAS specifically told KYARI that

CHIBUZO contacted "the job" behind ABBAS' back to "divert the job for himself." ABBAS asked KYARI to have the police administer the "serious beating of his life" and arranged with KYARI to pay to keep CHIBUZO imprisoned for at least a month, so that the fraud scheme could be successfully executed, and the money could be obtained. After KYARI arrested CHIBUZO, he sent ABBAS photographs of CHIBUZO in custody and later told ABBAS that he would not allow CHIBUZO's girlfriend to pay money to get CHIBUZO out of custody as he would have done for a "normal arrest." Following CHIBUZO's arrest, JUMA and ABBAS convinced the Victim Businessperson to make the payments of $299,983.58 described above.

12. In mid-February 2020, the Victim Businessperson came to believe that JUMA had defrauded him/her. ABBAS—still pretending to be "Malik," a Wells Fargo banker—purported to sympathize with the Victim Businessperson and then fraudulently induced the Victim Businessperson to make additional wire transfers of $100,000 to AGBABIAKA and $80,000 to a different coconspirator, which were laundered through a variety of means. At the same time, ABBAS led JUMA to believe that he had not received any additional payments from the Victim Businessperson.

13. Accordingly, there is probable cause to believe that ABBAS, JUMA, CHIBUZO, KYARI, FASHOLA, and AGBABIAKA committed violations of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) and 18 U.S.C. § 1956(h) (Conspiracy to Engage in Money Laundering).

III. STATEMENT OF PROBABLE CAUSE

A. Identification of Defendants

14. As discussed above, ABBAS was identified and charged in Case No. 2:20-CR-00322-ODW. (The identification of ABBAS is discussed in more detail

in the Complaint (Dkt. 1) filed in that case number.) The evidence discussed in this affidavit comes from (a) online accounts of ABBAS and (b) ABBAS' phone that the FBI obtained from law enforcement in the U.A.E., and all of which were searched pursuant to federal search warrants. Review of these sources of information provided evidence—including photographs, financial documents, messages with associates, and/or copies of government-issued identifications—confirming that ABBAS used the online accounts and phone discussed herein. Moreover, ABBAS admitted, during a Mirandized interview after his arrest by FBI, that he used the WhatsApp phone number +971543777711, the Instagram username hushpuppi, and the Snapchat account hushpuppi5.

15. The following sections discuss the identifications of JUMA, KYARI, CHIBUZO, FASHOLA, and AGBABIAKA, each of whom communicated and conspired with ABBAS on one or more messaging platforms, including ToTok and WhatsApp. In those ToTok and WhatsApp conversations ABBAS used the phone number +971543777711, and ABBAS also communicated using the Snapchat username hushpuppi5 and the Instagram username hushpuppi.

1. Identification of JUMA

16. JUMA used the phone number +254723337788[4] to communicate with ABBAS, which was saved by ABBAS in his contacts as "Abdul Kenya Akwete." JUMA also used his true name—ABDULRAHMAN JUMA—to communicate with the Victim Businessperson and the "Financial Advisor" of the Victim Businessperson.

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[4] Phone numbers listed in this affidavit have been reformatted to include a "+" before the country code, as is standard when listing international phone numbers. For example, the phone number "254723337788"—which JUMA used to communicate with ABBAS—is reformatted in this affidavit, for ease of reference, as "+254723337788."

17. According to the Victim Businessperson and the Financial Advisor (as discussed below in paragraph 47), JUMA provided his business card to the Victim Businessperson and the Financial Advisor during an in-person meeting in Kenya. The business card listed his name as ABDULRAHMAN JUMA and stated that he was the "Chairman" of Westload Financial Solutions. The business card also listed his phone number as +254723337788. A photograph of that business card is shown below.

18. Messages that JUMA exchanged with ABBAS corroborate JUMA's identity. On December 10, 2019, JUMA, using the phone number +254723337788, sent a photograph of a medical document to ABBAS. The document listed the patient's name as "ABDULRAHMAN JUMA," and JUMA told ABBAS that he was getting a checkup for an "itchy throat."

19. Records from Google, obtained on November 2, 2020, indicated that the phone number +254723337788 was listed in subscriber records of the email address aabdul300@gmail.com, which used the name "ABDULRAHMAN JUMA."

20. Records from financial service companies likewise indicate that JUMA used the phone number +254723337788:

a. Western Union records indicate that a person using the phone number +254723337788 listed the name "Abdulrahman Imraad Juma,"[5] and a date of birth in March of 1993, when making payments through the service.

b. MoneyGram records indicate that "ABDULRAHMAN IMRAAN JUMA"—with the same birthdate in March of 1993, phone number 723337788 (+254723337788 without the Kenya country code "+254"), and a Kenyan passport with the passport number ending in 1127—received a payment through the service on May 28, 2017.

21. Finally, I have reviewed a certified non-immigrant visa ("NIV") application submitted by JUMA. This application included the aforementioned phone number +254723337788 and listed JUMA's name as ABDULRAHMAN IMRAAN JUMA. Moreover, corroborating the records listed above, the NIV application listed JUMA's birthdate as the same date in March of 1993, his Official Kenya passport number as the same number ending in 1127, and his email address as aabdul300@gmail.com. The NIV application further included the following photograph of JUMA.

[5] This version of JUMA's name appears to have misspelled his middle name as "Imraad," rather than "Imraan."

22. Review of ABBAS' phone revealed that he and JUMA used a U.A.E.-based messaging platform called ToTok, on which JUMA was listed as the username "Wfs." The evidence indicating that JUMA used the username "Wfs" includes the following:

a. ABBAS and "Wfs" discussed the scheme to defraud the Qatari Victim Company in detail, including passing wire details and victim identifying information, while engaging in simultaneous conversations over WhatsApp, as well. For example, in December 2019, ABBAS and "Wfs" used ToTok to discuss how to defraud the Qatari Victim Company, including passing wire confirmation details and a photograph of the passport of the Victim Businessperson. At approximately the same time, ABBAS and JUMA used WhatsApp to share messages that they sent to and received from the Victim Businessperson, and further discussed how to split the proceeds of the fraud they obtained from the Victim Businessperson.

b. Further corroborating that "Wfs" was JUMA, "Wfs" stated on several occasions that he was located in Kenya, and was associated with the Kenyan law firm "Okatch & Partners," which was one of the companies that received funds sent by the Qatari Victim Company.

c. Moreover, there were a number of instances in which JUMA and "Wfs" sent the same or similar information to ABBAS on both WhatsApp and ToTok, respectively, in a short timeframe. For example, on January 3, 2020, JUMA forwarded a message to ABBAS through WhatsApp and, in the same minute, "Wfs" sent the same message to ABBAS using ToTok. Moreover, on January 6, 2020, "Wfs" sent a long message over ToTok to ABBAS discussing how he had not received any money from ABBAS. Within approximately 20 minutes, JUMA sent the same long message to ABBAS over WhatsApp.

2. Identification of KYARI

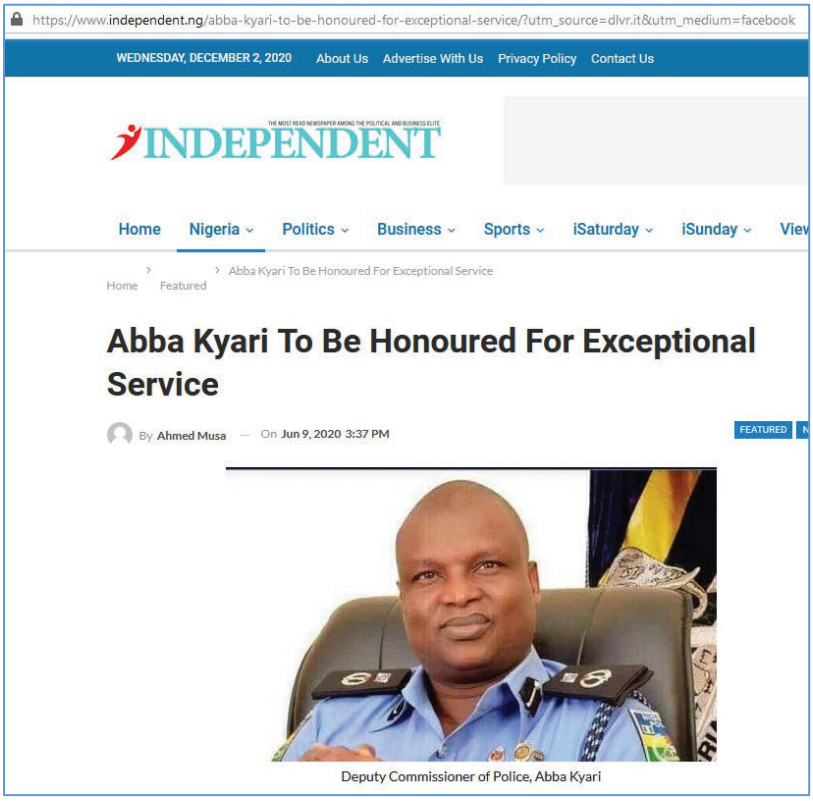
23. KYARI communicated with ABBAS primarily using the phone numbers +2349099999131 and +2348120000043—both of which ABBAS had saved with contact names including "ABBA KYARI," as discussed below. KYARI's messages to ABBAS contained numerous photographs of himself, some of which also included his name.

24. For example, using the phone number +2349099999131—which ABBAS had saved as "ABBA KYARI"—KYARI sent ABBAS the following photograph, on September 8, 2019:

25. This image depicts KYARI sitting at a desk, surrounded by multiple photographs of himself. Zooming in on the image revealed that the nameplate on the desk says "DCP ABBA A. KYARI" and a photograph on the wall states "DCP ABBA KYARI" and "THE NIGERIA POLICE FORCE." "DCP" is an acronym for "Deputy Commissioner of Police," which was KYARI's title within the Nigeria Police Force. A magnified version of the latter photograph is included here:

26. Using the phone number +2348120000043—which ABBAS had saved as "ABBA KYARI NEW NUMB"— KYARI sent several images of himself to ABBAS in April and May 2020, including the following:

27. Additionally, on June 9, 2020, KYARI sent ABBAS a link to an article in the Nigerian publication "The Independent" describing how the Deputy Commissioner of Police, ABBA KYARI, was being honored by the Nigeria House of Representatives. I and another FBI employee located this article online, and a screenshot of it is included below:



28. I reviewed online articles about KYARI, which indicated that KYARI is an Inspector General of the Police's Intelligence Response Team and a Deputy Commissioner of Police in Nigeria. KYARI previously managed the Special Anti-Robbery Squad, commonly known as SARS, as the Officer-In-Charge for several years. Articles referred to KYARI as a "super cop" of the Nigeria Police Force, and described him as "The Most Decorated Officer In The History Of The Nigerian Police."[6] KYARI has been awarded many accolades, including

[6] See, e.g., The Nigerian Voice, Meet Deputy Commissioner Of Police, Abba Kyari: The Commander, IGP Intelligence Response Team (IRT), August 24, 2019, https://www.thenigerianvoice.com/news/281020/meet-deputy-commissioner-of-police-abba-kyari-the-commande.html (last visited December 17, 2020); Nasir Avitogo, Premium Times, June 11, 2020, https://www.premiumtimesng.com/news/more-news/397226-reps-honour-abba-kyari-for-exemplary-performance.html (last visited December 17, 2020); The News Nigeria, Why House of Reps Decided to Honour Super Cop Abba Kyari, June 11, 2020, https://www.thenewsnigeria.com.ng/2020/06/11/why-house-of-representatives-decided-to-honour-abba-kyari/ (last visited December 17, 2020).

recognition for his performance by the Nigerian House of Representatives in June 2020, which KYARI informed ABBAS of via the news article discussed above. I also reviewed other articles, from October and November 2020, which indicated that KYARI had been accused of falsely arresting and extorting a businessman in Lagos.[7] Based on those articles, KYARI's work, in general, appears to have related primarily to kidnapping cases, and I did not see any articles suggesting that KYARI worked on fraud cases.

29. Finally, I have reviewed a certified NIV application submitted by ABBA ALHAJI KYARI, in April 2019. This application included one of the aforementioned phone numbers (09099999131) that KYARI used to communicate with ABBAS,[8] as well as a date of birth in March of 1975, and KYARI's Nigerian passport number ending in 3677. The NIV application also included the following

[7] Sahara Reporters, Businessman Petitions Lagos Judicial Panel, Reveals How DCP Abba Kyari Extorted Him of More Than N41m, Oct. 29, 2020, http://saharareporters.com/2020/10/29/businessman-petitions-lagos-judicial-panel-reveals-how-dcp-abba-kyari-extorted-him-more (last visited Feb. 11, 2021); Pulse.ng, Lagos Businessman Accuses DCP Abba Kyari of Extorting over N41m from Him, Oct. 28, 2020, https://www.pulse.ng/news/local/lagos-businessman-accuses-dcp-abba-kyari-of-extorting-over-n41m-from-him/r6c2t3f (last visited Feb. 11, 2021).

[8] Based on my training and experience, I know that this phone number format includes the prefix "0," which is how someone within Nigeria would dial that phone number, rather than using the country code "+234."

photograph, which is consistent with the other photographs of KYARI shown above:

30. Based on messages I reviewed, ABBAS appears to have first interacted with KYARI in September 2019, when KYARI traveled to the U.A.E. The conversation indicated that ABBAS sent a car and driver to drive KYARI during that trip. Soon thereafter, KYARI sent ABBAS a video slideshow which showed some personal photographs of KYARI, some of which appeared to have been taken in the U.A.E. Later in September, after KYARI sent ABBAS an article that discussed him arresting alleged kidnappers, ABBAS wrote, in part, to KYARI, "Am really happy to be ur boy," and later, "I promise to be a good boy to u sir."

3. Identification of CHIBUZO

31. CHIBUZO communicated with ABBAS on multiple messaging platforms using the Nigerian phone number +2348078425723, which ABBAS had saved with the name "Kelly Ogudu New."

32. As detailed later in this affidavit (see Section III.B.4), at one point during the scheme to defraud the Qatari Victim Company, CHIBUZO contacted the Victim Businessperson in an attempt to redirect proceeds of fraud to himself. In retaliation, ABBAS employed the assistance of KYARI to have CHIBUZO

imprisoned. The conversation between ABBAS and KYARI about CHIBUZO contained identifying information for CHIBUZO, as well as multiple photographs of him.

a. For example, on January 13, 2020, after becoming frustrated with "Kelly Ogudu New," ABBAS asked him thorough a messaging platform for a good contact number for him. "Kelly Ogudu New" responded to ABBAS' request and provided the telephone number +2348078425723. ABBAS then sent this number, and another phone number, to KYARI.

b. Then, on January 20, 2020, KYARI sent ABBAS detailed information relating to CHIBUZO, including CHIBUZO's full name (VINCENT KELLY CHIBUZO), age at the time (37), place of birth, and address in Abuja. Additionally, KYARI sent the following photograph of CHIBUZO and wrote, "We have arrested the guy [¶] He is in my Cell now."

c. ABBAS confirmed CHIBUZO's identity, stating "Yes yes that is him sir."

d. Separately, in order to substantiate the claim that CHIBUZO stole money from him, ABBAS provided KYARI screenshots of conversations that contained the phone number 3054405586, as evidence that CHIBUZO attempted to

redirect proceeds of the fraud to himself. This number was used by "Kelly Ogudu New" to pass a fake bank website address to ABBAS, as later described in paragraph 130.

e. Moreover, as described in paragraph 148, KYARI sent ABBAS other photographs of CHIBUZO, when discussing how long he had been holding CHIBUZO in custody.

4. Identification of FASHOLA

33. FASHOLA communicated with ABBAS using ToTok and WhatsApp. ABBAS had saved FASHOLA's contact information on ToTok (with phone number 13472042529) as "Morayo Facetime," and on WhatsApp (with the phone number 19735195993) as "Morayyyyyyyyoooooo."

34. Review of the ToTok communications and other information from ABBAS' online accounts confirmed the identity of FASHOLA, as well as indicating that ABBAS and FASHOLA had a child together. For example, on March 12, 2020, FASHOLA provided photographs of a high school transcript and college diploma to ABBAS, which she stated belonged to her. The high school transcript was issued by the New York City Department of Education, and it listed the name RUKAYAT FASHOLA, a specific address on Nostrand Avenue in Brooklyn, New York, and date of birth in October of 1992. The college diploma was issued by Hunter College of the City University of New York and listed the name RUKAYAT M. FASHOLA.

35. Additionally, on March 5, 2020, FASHOLA sent ABBAS a photograph of her business card, which included the name RUKAYAT FASHOLA, her photograph, and the phone number 9735195993, which she used to communicate with ABBAS on WhatsApp. That photograph is pictured below.

36. In August 2020, I reviewed Department of Motor Vehicles ("DMV") records for the State of New York, which confirmed FASHOLA's date of birth and address as consistent with the information described above. The records further included the below photograph of FASHOLA.

5. Identification of AGBABIAKA

37. AGBABIAKA communicated with ABBAS using the U.S. phone number 9177740064, which ABBAS had saved with the name "Bolatito New."

38. On December 30, 2019, AGBABIAKA sent ABBAS a message containing a photograph of her Nigerian passport, pictured below, which listed her name as BOLATITO TAWAKALITU AGBABIAKA.

39. Records from T-Mobile USA, Inc., received on August 28, 2020, indicated that the phone number 9177740064 was subscribed to BOLATITO

AGBABIAKA, with the same birthdate in April of 1987 as the passport, and a specific address on Metcalfe St. in Staten Island, New York.

40. In August 2020, I reviewed records from the DMV of New York, which further confirmed AGBABIAKA's identity, including the name, date of birth, and address listed above. Those records also included the following photograph, which is consistent with the photograph on the Nigerian passport AGBABIAKA sent to ABBAS.

41. On September 9, 2020, AGBABIAKA entered the United States by commercial aircraft from the United Kingdom. I reviewed a U.S. Customs and Border Protection report of a secondary inspection conducted subsequent to her arrival into the United States. During that secondary inspection, AGBABIAKA confirmed her address on Metcalfe Street in Staten Island, New York; that her phone number was 9177740064; that her Instagram account was @bolamide; and that her email addresses were atito2003@yahoo.com and atito2003@gmail.com.

42. Records from email and social media providers confirm that AGBABIAKA used that that phone number, the moniker "bolamide," and the two email addresses listed above:

a. Records from Snap Inc., received on November 16, 2020, indicated an active Snapchat account for the username "bolamide," which used the registration email address atito2003@gmail.com and phone number 9177740064.

b. Records from Google Inc., received on January 6, 2021, indicated that email address atito2003@gmail.com was registered to "Bola Tito" and also listed the phone number 9177740064.

c. Records from Oath Holdings Inc., received on January 8, 2021, indicated that email address atito2003@yahoo.com was registered to "Bolatito Agbabiaka" and also listed the phone number 9177740064.

B. Scheme to Defraud the Victim Businessperson and the Qatari Victim Company

43. Pursuant to federal search warrants for ABBAS' phone and multiple online accounts, I have reviewed communications on multiple messaging platforms between ABBAS and coconspirators—including JUMA, CHIBUZO, KYARI, AGBABIAKA, FASHOLA, FASHOLA's relative who is referred to herein as "Coconspirator 5," and others—regarding the fraud and money laundering scheme targeting the Victim Businessperson and the Qatari Victim Company. I have also interviewed the Victim Businessperson and the "Financial Advisor" of the Victim Businessperson, who have confirmed the details of this fraudulent scheme and provided related documents. Finally, I have obtained records from banks, money service companies, telephone providers, email and social media companies, the Department of State, and the Los Angeles County Registrar-Recorder/County Clerk's Office. The information described below is based, collectively, on these sources of information, except as otherwise indicated.

1. Initiation of Fraud Scheme and Initial Fraudulent Payments of $314,442.78 to JUMA

44. I know the facts described in this section based on information provided by the Victim Businessperson and the Financial Advisor, including documents they provided.

45. The Victim Businessperson planned to build an international school (the Qatari Victim Company) in Qatar, and therefore hired the Financial Advisor to find a lender who could invest $15 million in the project.

46. Around October 1, 2019, the Financial Advisor began reaching out to business contacts and conducted searches online to secure an investor to provide the $15 million loan for his client. As a result of the online search, the Financial Advisor came into contact with Coconspirator 1, who claimed to live and work in the Philippines. Coconspirator 1 referred the Financial Advisor to a company in Kenya—Westload Financial Solutions Limited ("Westload")—to facilitate the loan.

47. On November 12, 2019, the Financial Advisor and the Victim Businessperson travelled to Kenya to meet in person with JUMA and another person. As noted in paragraph 17, JUMA's business card identified him as the "Chairman" of Westload, while the business card of the other person stated he was the "Funding Officer."

48. During this meeting, the Victim Businessperson signed a contract with Westload. The contract stated that the Victim Businessperson was responsible for paying a "consultancy fee" of $225,000 through the law firm Okatch & Partners ("Okatch"), which was located in Kenya. The payment was to be made in two installments—an initial payment of $157,500 and a second payment for $67,500. Westload also provided two initial invoices; one for $157,500 for the first installment and another for $6,900, for purported legal and initial engagement fees.

49. Concurrently, on about November 12, 2019, the Victim Businessperson began communicating with JUMA over WhatsApp.

50. On around November 13 and 14, 2019, the Victim Businessperson wired approximately $164,450 to Okatch in four separate transactions.

51. On about December 1, 2019, JUMA provided the Victim Businessperson a wire transfer confirmation—which was forged and fraudulent—showing a transfer of $15 million from a Barclays Bank PLC account in the United Kingdom to the Qatar National Bank ("QNB") account of the Qatari Victim Company, dated November 28, 2019.

19 (per conversation with affiant 2/12/2021)

52. On about December 4, 2020, the Victim Businessperson learned from QNB that it had not received a payment from Barclays for the Qatari Victim Company.

53. Shortly thereafter, on about December 5, 2019, JUMA told the Victim Businessperson that another "payment of release order" was needed to secure the loan, and requested an additional payment of $150,000.

54. On around December 6 and 7, 2019, the Victim Businessperson wired approximately USD $150,000 to Okatch in four transactions.

2. JUMA, ABBAS, CHIBUZO, and Others Defrauded the Victim Businessperson of $330,000, and ABBAS Used the Funds to Purchase a Luxury Richard Mille Watch and St. Kitts Citizenship

55. Starting on December 7, 2019, JUMA began communicating with ABBAS about the scheme to defraud the Victim Businessperson.[9] They discussed

[9] I know the facts described in this and the following sections—about communications between the various Defendants and other coconspirators—based on a review of communications on multiple messaging platforms between ABBAS and the other Defendants, and other coconspirators, obtained pursuant to federal search warrants.

prior payments by the Victim Businessperson, getting the Victim Businessperson's passport information, and forms that they could send the Victim Businessperson to further the fraud scheme. They also discussed how to share the money that the Victim Businessperson would be sending, and JUMA sent ABBAS a photograph of the Victim Businessperson's Qatar passport.

56. On December 10, 2019, ABBAS told JUMA that he would pretend to be a director of a bank when communicating with the Victim Businessperson. ABBAS stated, in part, "u need to let me know when reach to forward [him/her] to speak to the director of the bank which is me to cement things with [him/her] and prepare [him/her] for what's cominh" (sic). JUMA agreed that this was a good idea and that he would introduce the Victim Businessperson to ABBAS. ABBAS also told JUMA that he would make a new WhatsApp number to talk with the Victim Businessperson, possibly using a different phone. ABBAS sent JUMA the phone number +19177026999 and then, the next day, asked JUMA on a different messaging platform if he had received the "work number."

a. As discussed below, this phone number—+19177026999—was what ABBAS used to communicate with the Victim Businessperson.

57. On December 11, 2019, JUMA explained to ABBAS how profits were typically shared in Kenya. ABBAS then wrote "What I had in mind was if there's 150k, I get 50k and u and ur guys get 100k"—indicating that he wanted to receive one-third of the amount received from the Victim Businessperson for his role in the fraud scheme.

58. Several hours later, JUMA sent ABBAS the name and phone number of the Victim Businessperson so that ABBAS could contact the victim directly. When JUMA asked if he should refer to ABBAS' persona—"Malik"—as being from Dubai, ABBAS responded "No o [¶] My number is from USA [¶] So say from New York."

59. ABBAS sent messages to the Victim Businessperson claiming to be "Malik," the "director of the bank responsible for crediting you the funds," who was working with "Mr. Rahman from Kenya" (i.e., JUMA). At approximately the same time, JUMA told the Victim Businessperson that "Mr. Malik from the US" would be contacting the Victim Businessperson, and sent the Victim Businessperson the phone number that ABBAS sent him. While both were communicating with the Victim Businessperson, JUMA and ABBAS shared with each other screenshots and copied text of parts of the conversations they were each having with the Victim Businessperson.

60. Shortly afterward, also on December 11, 2019, JUMA asked ABBAS "What do you think of [him/her?]" ABBAS responded, "Amazing job, [s/he] was complying accordingly."

61. On December 16, 2019, ABBAS contacted a coconspirator ("Coconspirator 2"), saying he needed a male voice to call from a specific number, because the Victim Businessperson was "expecting call [sic] from a bank executive in New York[.]" ABBAS then provided the phone number of the Victim Businessperson to Coconspirator 2 and explained what he should say to the Victim Businessperson. Specifically, ABBAS told Coconspirator 2 to relay to the Victim Businessperson that they would need to open a bank account in the United States in order to transfer the $15 million loan because Qatar had purportedly been sanctioned by the United States government. ABBAS also forwarded several conversations he had on WhatsApp with the Victim Businessperson to Coconspirator 2.

62. After Coconspirator 2 contacted the Victim Businessperson, the Victim Businessperson thanked ABBAS, and asked to have the loan funds transferred from the U.S. bank account that would be set up by ABBAS to the Victim Businessperson's bank account in London. At approximately the same

time, ABBAS reported to JUMA, "[S/he]'s so happy[.] I had a white guy call [him/her] from America now" . . . Real white man [¶] I was on the other line [¶] [S/he] was so happy and . . . respectful[.]"

63. Shortly thereafter, JUMA asked ABBAS if the Victim Businessperson had opened the U.S. bank account already. ABBAS responded, "the contact is opening [his/her] bank account today [¶] I will give [him/her] everything today [¶] Day just started in America." ABBAS then sent to JUMA a part of conversation he was having with the Victim Businessperson, explaining "Me and [man/woman] in conversation [¶] [S/he] will carry $550,000 bill today."

64. On December 17, 2019, JUMA asked ABBAS if he had opened the U.S. bank account yet. ABBAS responded, "Company opened, account will be opened today." At approximately the same time, the Victim Businessperson told JUMA that s/he had talked to "Mr. Malik from the US" and that he had confirmed that the U.S. bank account would be set up and the $15 million loan would be transferred to London after clearing the U.S. bank account. JUMA then relayed that conversation to ABBAS.

65. Records from the Los Angeles County Registrar-Recorder/County Clerk's Office confirm that a person ("Coconspirator 3") filed a Fictitious Business Name Statement in the name of the Qatari Victim Company on December 17, 2019. Bank records indicate that Coconspirator 3 then used that Fictitious Business Name Statement to open a bank account ending in 5320 at the Wells Fargo branch in Canoga Park (the "Canoga Park Wells Fargo Account") in the name of the Qatari Victim Company, on December 17, 2019.

66. On December 19, 2019, ABBAS sent JUMA a photograph of a check for the Canoga Park Wells Fargo Account and an image of a Fictitious Business Name Statement for the Qatari Victim Company, which listed Coconspirator 3 as the registered owner.

67. The same day, ABBAS sent the names of the Victim Businessperson, the Qatari Victim Company, and Coconspirator 3, and a photograph of the Fictitious Business Name Statement filed by Coconspirator 3, to CHIBUZO. Later that day, CHIBUZO sent a photograph to ABBAS of a signature page for a document, and told ABBAS that he should tell the Victim Businessperson that the document would be notarized and sent back to the Victim Businessperson.

68. On December 19, 2019, ABBAS sent the Victim Businessperson the document that CHIBUZO had created, which purported to be a "Durable Power of Attorney" form, and requested that it be returned signed. After the Victim Businessperson signed and returned it, ABBAS told the Victim Businessperson that he forwarded the "Durable Power of Attorney" document to "the appointed personnel to go to the notary office to get it notarized." The form fraudulently purported to be appointing Coconspirator 3 as the "attorney-in-fact" for the Victim Businessperson, on behalf of the Qatari Victim Company.

69. On December 20, 2019, ABBAS sent the account and online login information for the Canoga Park Wells Fargo Account—including the name of the Qatari Victim Company, the bank account number (ending in 5320), the routing number, and the username and password to login to the account—to the Victim Businessperson.

70. Shortly afterward, the Victim Businessperson sent ABBAS the account information for a United Kingdom bank account where ABBAS could send the loan funds. ABBAS told the Victim Businessperson that it would not work to send funds to a "personal account" in the United Kingdom and, instead, said that the Victim Businessperson should open an "investor's account with our private banking service over there[.]" After the Victim Businessperson requested ABBAS' help opening the bank account, ABBAS stated that he would need the Victim Businessperson's "passport photograph" and that the account would need

to be funded with a "minimum of 250,000 pounds," which ABBAS said the Victim Businessperson could access after the account was opened.

71. The Victim Businessperson appeared hesitant to wire an additional £250,000, and said s/he wanted to speak to JUMA. At approximately the same time, ABBAS told JUMA "[S/he]'s paying 250k pounds." ABBAS further wrote, "[S/he] just wants to speak to you to confirm it[,] so confirm it and let [him/her] pay tomorrow. This one is just going to be between me and you cos it's not even the main bill[.]"

a. Based on my training and experience, this conversation suggests that ABBAS and JUMA were not planning on sharing the fraudulently obtained funds with other coconspirators.

72. On December 20, 2019, JUMA sent to ABBAS what appeared to be a message from the Victim Businessperson. That message stated, "I understood that once the US account is opened then the fund will be in the account and Mr. Malik will help me transfer to my UK account."

73. ABBAS also forwarded to JUMA a message he received from the Victim Businessperson about the Victim Businessperson being unwilling to pay additional fees. This led to an argument between ABBAS and JUMA regarding a "commission payment" that was supposed to belong to JUMA. ABBAS responded, "Bro don't let me be wasting my time, how are u telling client not to pay and u are letting me stress out" and JUMA wrote "Come hush" (referencing ABBAS' nickname, "Hush" or "Hushpuppi") as part of his response.

a. Based on my training and experience with online fraud investigations involving Nigerian-origin subjects, the term "client" often refers to a victim of fraud.

74. On December 22, 2019, JUMA told ABBAS that they needed to "show" the Victim Businessperson "something" to get him/her "excited" about the loan.

75. Eventually, on December 23, 2019, the Victim Businessperson agreed to send additional money, contacting ABBAS to inquire about the different types of investment accounts that were available. The Victim Businessperson further asked ABBAS where to send the money. On December 23, 2019, ABBAS told the Victim Businessperson that s/he would be sending funds to "two separate accounts," and that ABBAS would "provide . . . full details in the morning cos of red flags."

76. A few days earlier, on December 19, 2019, ABBAS communicated with AGBABIAKA regarding a bank account to which he could send the funds. AGBABIAKA provided account information for a Capital One bank account ending in 2389 opened in her name (the "AGBABIAKA Capital One Account"), including the account number, the routing number, the bank's address, and AGBABIAKA's home address.

a. Based on records from Capital One, AGBABIAKA opened the AGBABIAKA Capital One Account on January 17, 2017.

b. In the days after AGBABIAKA provided her Capital One bank account information, AGBABIAKA provided the bank account information for two persons she had attempted to recruit for ABBAS to use their bank accounts to receive fraudulent proceeds, as described in the paragraphs below. AGBABIAKA negotiated with these persons on ABBAS' behalf regarding the amount that they would be paid for the use of their accounts:

i. On December 23, 2019, AGBABIAKA provided information regarding a Chase bank account in another person's name for ABBAS to use, including the account number, routing number, account owner's name,

business account name, bank address, account address, and ATM PIN. ABBAS asked "And what does he or she want for helping me receive the funds and handing over to you?" AGBABIAKA responded "This one wan collect percentage ni oo [¶] He dey tel me say 50/50 [¶] I b tell am say no." (In other words, based on my training and experience with Nigerian Pidgin, AGBABIAKA was saying that the accountholder had requested 50 percent of the funds, which she told him was not acceptable.) AGBABIAKA then suggested to ABBAS that she was waiting for two other persons who might provide accounts to use, and sent screenshots to ABBAS of her requests to them for accounts to accept a wire transfer.

ii. On December 24, 2019, ABBAS then stated, "Yankee needed and the money will be sent out tomorrow morning." (Based on my training and experience with Nigerian Pidgin, "Yankee" is a term sometimes used by persons of Nigerian descent who are committing fraud to refer to a bank account in the United States—so, in other words, ABBAS was saying that he needed a U.S. bank account for a transfer that would occur the next day.) AGBABIAKA then provided the business name, account address, bank address, account number, routing number, and SWIFT code for a TD Bank account in the name of another person. ABBAS asked if that person would "take 10%," and AGBABIAKA responded, "He talk 20%." ABBAS responded "15 max."

iii. Ultimately, however, when ABBAS would not agree to the terms those persons requested for using their bank accounts, ABBAS asked AGBABIAKA if her own Capital One bank account could receive a wire transfer. AGBABIAKA told ABBAS that she would try to open an account at TD Bank, and ABBAS told her to try to "open accounts" that could accept wire transfers.

77. On December 23, 2019, ABBAS asked AGBABIAKA for the "swift code" for her own bank account, which AGBABIAKA, in turn, provided.

78. Also on December 23, 2019, ABBAS began communicating over Instagram with the Florida Watch Seller. This conversation is further described in paragraphs 95 to 95.e. ABBAS then asked the Florida Watch Seller to "send me the account" and the watch seller responded with details of his Wells Fargo account (the "Watch Seller Wells Fargo Account").

79. On December 24, 2019, ABBAS sent the Victim Businessperson account information—including the accountholders' names and addresses, the account numbers, the routing numbers, and the SWIFT codes—for the AGBABIAKA Capital One Account and the Watch Seller Wells Fargo Account. ABBAS also provided instructions for the amounts that were to be paid to each account in U.S. dollars—$265,000 to the Watch Seller Wells Fargo Account and $65,000 to the AGBABIAKA Capital One Account, for a total of $330,000.

80. The Victim Businessperson questioned why the payment was to be in U.S. Dollars when ABBAS initially told him/her it would be £250,000. ABBAS responded, "That's the equivalent in pounds, it won't go in as pounds to the us account so even if you send in pounds, it will be converted to usd and might fall short on exchange rates so it's better to send by usd to avoid such."

81. Later, the Victim Businessperson told ABBAS that there was a $230,000 wire limit per transfer, so s/he would be sending $230,000 to the Watch Seller Wells Fargo Account and $100,000 to the AGBABIAKA Capital One Account. The Victim Businessperson made those wire transfers from the Qatari Victim Company's Qatar National Bank (QNB) account on December 24, 2020, and then sent ABBAS photographs of the wire transfer confirmations, upon his request.

82. The Victim Businessperson also told JUMA s/he had completed the transfer of $330,000 into two accounts and asked, "Can you please let me know when I can receive the fund [sic] as agreed and promised[?]" JUMA forwarded the

messages from the Victim Businessperson to ABBAS and stated "I need your advise [sic] before I get back to [him/her.]"

i. ABBAS and AGBABIAKA Laundered $100,000 in a Variety of Ways, Including $50,000 Used to Fraudulently Purchase St. Kitts Citizenship for ABBAS

83. ABBAS and AGBABIAKA laundered the $100,000 in a variety of ways. This included cash withdrawals and cashier's checks, using illicit money exchangers to transfer funds to Nigeria, and using $50,000 of the funds to fraudulently purchase St. Kitts citizenship and a passport for ABBAS. This laundering is further described in the remainder of this section.

84. On December 24, 2019, ABBAS sent a photograph of the wire transfer confirmation for the wire destined for the AGBABIAKA Capital One Account to AGBABIAKA. This photograph contained the account number for the Qatari Victim Company's QNB account, among other information.

85. On December 26, 2019, AGBABIAKA provided ABBAS screenshots of the AGBABIAKA Capital One Account showing that the wire of $100,000 had been posted to the account.

a. Bank records for the AGBABIAKA Capital One Account confirmed the wire transfer of $100,000 from the Qatari Victim Company's QNB account.

86. Starting on December 26, 2019, AGBABIAKA and ABBAS discussed the laundering of the funds. AGBABIAKA told ABBAS that she was able to withdraw $7,000, would find a "buyer," and asked for ABBAS' bank account information.

a. Based on my training and experience, AGBABIAKA's reference to finding a "buyer" indicates that she was going to sell the $7,000 in U.S. Dollars to an unlicensed, illicit currency exchanger, who would then transfer

the equivalent amount of Nigerian Naira to the bank account that she specified. ABBAS' response to AGBABIAKA, described in paragraph 87, corroborates that understanding.

b. Bank records for the AGBABIAKA Capital One Account show a cash withdrawal of $7,100 on December 26, 2019.

87. ABBAS then sent AGBABIAKA the account number for a bank account at Guaranty Trust Bank ("GTBank")—a Nigerian bank—in the name of another person. When AGBABIAKA noted that this was not ABBAS' bank account, ABBAS explained that this was the account he used now; he did not use his Nigerian bank account anymore because he was under investigation in Nigeria: "Them dey investigate me so I stop to dey use my account."

88. Shortly after that, AGBABIAKA told ABBAS "Na 355 I find ooo." Based on my training and experience with investigations involving money laundering and Nigerian-origin subjects, I understand that AGBABIAKA was likely telling ABBAS that she was able to find a money exchanger who would provide an exchange rate of $1 U.S. dollar to 355 Nigerian Naira. ABBAS then responded, "Go ahead."

89. Later, after asking AGBABIAKA to "sell" an additional $20,000, ABBAS confirmed AGBABIAKA was working to facilitate the transfer of more money to him, writing "U fit sell dollar there and send me naira?" AGBABIAKA responded "I don do 12k so far frm d 20k u request yesterday" and said later that she would go to Maryland "to deliver d money" to a buyer. (I know based on investigations involving targets who communicated in Nigerian Pidgin that "don" roughly means "did," so AGBABIAKA was telling ABBAS that she had exchanged $12,000 of the $20,000 he had requested.)

90. On December 27, 2019, ABBAS also told AGBABIAKA that she could keep $8,000 for herself to spend on what she wanted. Account records show

that AGBABIAKA subsequently withdrew $10,000 as a cashier's check payable to "BOLATITO T AGBABIAKA," on December 30, 2019. Account records for a bank account at TD Bank opened in AGBABIAKA's name (the "AGBABIAKA TD Bank Account") show that AGBABIAKA deposited the cashier's check into that account on December 30, 2019. Based on review of the account statements, AGBABIAKA spent this money on personal expenses.

91. On December 30, 2019, AGBABIAKA sent ABBAS several photographs of transfer receipts showing transfers of more than 4,136,000 Naira (more than $10,000, based on reported exchange rates) to the GTBank account that ABBAS had previously sent her. AGBABIAKA also sent a photograph of her Nigerian passport, which is described and pictured in paragraph 38, and a passport-sized photograph of herself. (As discussed below, in paragraph 100, ABBAS later sent this passport to the Florida Watch Seller to confirm the identity of the person who would be picking up the Richard Mille watch.)

92. Finally, ABBAS used $50,000 of the funds that went into the AGBABIAKA Capital One Account to fraudulently purchase citizenship from St. Kitts and obtain a passport:

a. Beginning in September 2019, ABBAS exchanged messages with a dual U.S. and St. Kitts citizen ("Coconspirator 4") whose parents were citizens and residents of St. Kitts. Coconspirator 4 told ABBAS how he could obtain St. Kitts citizenship and a passport. The scheme included creating a false marriage certificate and then apparently bribing a government official in St. Kitts. ABBAS told Coconspirator 4 that he would create a fake marriage certificate showing that he was married to Coconspirator 4.

b. On October 16, 2019, Coconspirator 4 provided ABBAS with her personal identifying information, including her full name, date of birth, occupation, address, father's name, and father's occupation (bailiff) to use in the

marriage certificate. Coconspirator 4 further told ABBAS to backdate the marriage certificate to October 2018.

c. Two days later, ABBAS sent Coconspirator 4 a photograph of the forged and fraudulent marriage certificate from the Federal Republic of Nigeria.

d. On November 5, 2019, Coconspirator 4 told ABBAS the name of the St. Kitts government official to whom he should mail his documents to request citizenship and a passport.

e. On November 13, 2019, Coconspirator 4 told ABBAS that her father could speak to ABBAS directly about how to expedite ABBAS' citizenship and passport, and told ABBAS to call him on WhatsApp.

f. On multiple occasions in December 2019, Coconspirator 4 and ABBAS discussed the process for obtaining citizenship, and the price for citizenship. Coconspirator 4 told ABBAS that her father was trying to negotiate a price, and that he thought it would be "$60,000 to $55,000." Ultimately, after further discussion, ABBAS told Coconspirator 4, on December 30, 2019, "Tell him I can do 50K."

g. The next day, December 31, 2019, ABBAS told Coconspirator 4 that he would split the payment of $50,000 into two transactions: one would be a $40,000 cashier's check and the other a $10,000 cash payment.

h. On December 31, 2019, ABBAS also sent AGBABIAKA the First National Bank of Pennsylvania account number and the name of Coconspirator 4's father, telling her "Send $40,000 tomorrow." After AGBABIAKA told ABBAS that it would take 30 days to send a wire from the AGBABIAKA Capital One Account, ABBAS and AGBABIAKA agreed that AGBABIAKA would attempt to withdraw the amount by cashier's check.

i. AGBABIAKA sent ABBAS a photograph of the cashier's check made out to the name of Coconspirator 4's father, and photographs confirming that she mailed the check to an address ABBAS provided (from Coconspirator 4) in Georgia. Before AGBABIAKA sent that photograph, ABBAS explained to AGBABIAKA that he had used this money to obtain citizenship by arranging to have marriage paperwork created and then paying for citizenship.

j. ABBAS sent Coconspirator 4 a screenshot of a messaging conversation with AGBABIAKA discussing the cashier's check, and later sent Coconspirator 4 the photograph of a cashier's check in the amount of $40,000 made payable to Coconspirator 4's father, drawn from the AGBABIAKA Capital One Account.

i. Bank records for the AGBABIAKA Capital One Account show that AGBABIAKA purchased the cashier's check of $40,000, on or about December 31, 2019. Records for the First National Bank account of Coconspirator 4's father show that the cashier's check was deposited into the account on January 13, 2020.

k. On January 29, 2020, Coconspirator 4 told ABBAS that his citizenship certificate had been signed and the passport application had been generated.

l. On February 4, 2020, Coconspirator 4 sent ABBAS a photograph of his Certificate of Citizenship, pictured below:

SAINT CHRISTOPHER AND NEVIS

THE SAINT CHRISTOPHER AND NEVIS CITIZENSHIP ACT, 1984 (NO. 1 OF 1984)

THE SAINT CHRISTOPHER AND NEVIS CITIZENSHIP REGULATIONS, 1984

Certificate of Citizenship

Whereas RAMON OLORUNWA ABBAS who was born at LAGOS, NIGERIA on 11TH OCTOBER, 1982, has applied in the prescribed manner for the grant of a Certificate of Citizenship of Saint Christopher and Nevis pursuant to the provisions of section 92(1)(a) of the Saint Christopher and Nevis Constitution Order 1983, (S. I. No. 881) I hereby certify that the said RAMON OLORUNWA ABBAS has been granted citizenship of Saint Christopher and Nevis in accordance with the Saint Christopher and Nevis Constitution Order 1983 (S. I. No. 881).

Registration No. 26636

Dated this 17th day of January, 2020

Prime Minister

m. On February 7, 2020, Coconspirator 4 instructed ABBAS to pay the remaining $10,000 to another person, instead of her father, using a Georgia United Credit Union account.

i. Account records for the AGBABIAKA Capital One Account show that AGBABIAKA purchased a cashier's check of $10,000 in the name of that other person, on March 2, 2020. The account records for that person's Georgia United Credit Union account show that the cashier's check was deposited into the account on March 2, 2020.

n. On February 24, 2020, ABBAS sent a message to a person showing ABBAS shaking hands with another male, standing before what appears to be a St. Kitts flag, holding a St. Kitts passport. That photograph is pictured below.

o. ABBAS' St. Kitts passport was seized at his residence in Dubai upon arrest by the Dubai Police Department, on June 9, 2020, and provided to the FBI, on July 2, 2020, at the time of ABBAS' arrest.

ii. ABBAS Conspired with AGBABIAKA and FASHOLA to Launder the $230,000 Wire Through Purchase of a Richard Mille RM 11-03 Watch, Which Coconspirator 5 Hand-Delivered to ABBAS in the U.A.E.

93. As noted above, ABBAS used the wire transfer of $230,000 to purchase a luxury Richard Mille RM 11-03 watch, conspiring with AGBABIAKA and FASHOLA to transport the watch to the U.A.E. That part of the scheme is discussed in this section.

94. Bank records indicate that the Victim Businessperson wired $230,000 from the QNB account of the Qatari Victim Company to a bank account used by the Florida Watch Seller on December 26, 2019.

95. In late December 2019, ABBAS discussed and negotiated, using messaging platforms, with the Florida Watch Seller about the purchase of a Richard Mille RM 11-03 watch:

a. On December 23, 2019, the Florida Watch Seller sent ABBAS multiple photographs of Richard Mille watches, and told ABBAS, "New Rose Gold Titanium $230 Full Rose $265 New Full Rose $275."

b. After sending a photograph of a new Rose Gold and Titanium Richard Mille 11-03 watch, the Florida Watch Seller told ABBAS that it cost $230,000. The Florida Watch Seller told ABBAS that another new, fully Rose Gold Richard Mille 11-03 watch was in New York.

c. ABBAS then immediately asked for the Florida Watch Seller's bank account information. The Florida Watch Seller provided account details, including the beneficiary name, account number, and routing number for the Watch Seller Wells Fargo Account.

d. On December 24, 2019, after confirming that the bank account could handle large, international wire transfers, ABBAS told the Florida Watch Seller, "It's done bro," and sent the photograph of the wire transfer confirmation that the Victim Businessperson sent to ABBAS.

e. ABBAS and the Florida Watch Seller then discussed the particular watch he would be purchasing, with ABBAS ultimately purchasing the Rose Gold and Titanium model.

96. On December 26, 2019, after the wire transfer from the Victim Businessperson, ABBAS asked AGBABIAKA if she would be available to go to Miami to pick up the watch and fly with it to Dubai. He also provided a phone number for the Florida Watch Seller. After apparently calling the phone number, AGBABIAKA reported to ABBAS, "he said he will send it to his partner for nyc," indicating that the Florida Watch Seller would ship the watch ABBAS was

purchasing to New York City to another watch seller (the "New York Watch Seller").

97. FASHOLA was separately communicating with the Florida Watch Seller, as well, for ABBAS. On December 31, 2019, FASHOLA forwarded communications to ABBAS that she was having with the Florida Watch Seller. In images discussing the $230,000 wired to the Florida Watch Seller, the Florida Watch Seller told FASHOLA to explain to ABBAS that the delay in sending the watch was because "the bank thought it was fraud cause the way he sent the money."

98. During that approximate time, ABBAS was also communicating with the Victim Businessperson, and told him/her that the receiver of the wire (the Florida Watch Seller) told the bank the wire was for a watch, not for a school (the Qatari Victim Company). ABBAS later reported to the Victim Businessperson, on December 31, 2019, that the issues with the wire had been cleared.

99. Bank records indicate that, on January 2, 2020, the Florida Watch Seller sent a wire transfer of $225,000 to the bank account of the New York Watch Seller, with the wire transfer details stating, "Watch Payment from [Florida Watch Seller] Richard Mille RM11 03 RG Ti 2019."

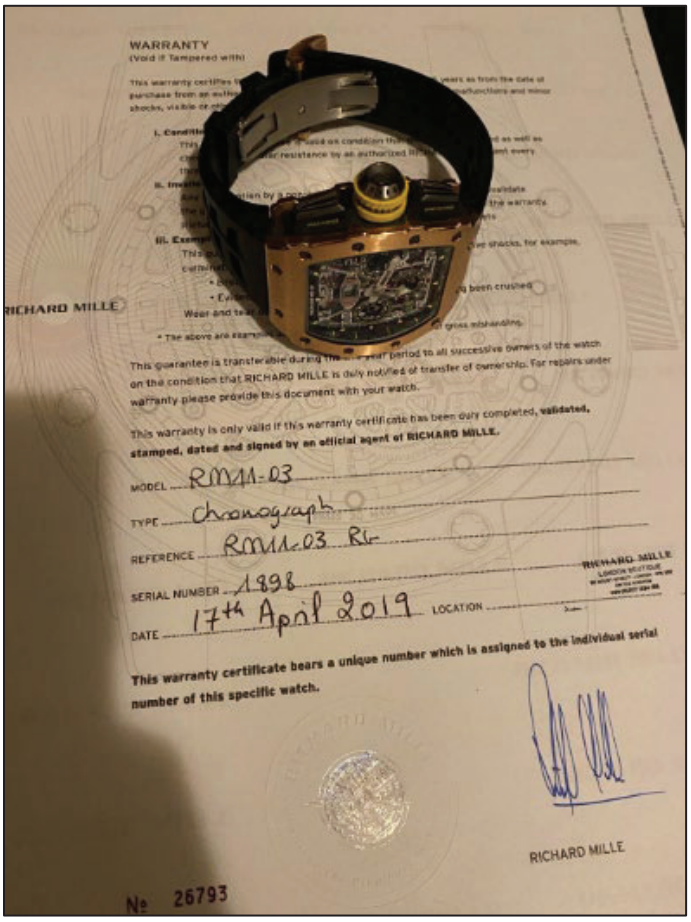
100. On January 3, 2020, ABBAS sent the Florida Watch Seller a photograph of AGBABIAKA's passport, as discussed in paragraphs 38 and 91. In response, the Florida Watch Seller provided a phone number for the New York Watch Seller. Shortly thereafter, ABBAS messaged the New York Watch Seller and introduced himself as "Hush." The New York Watch Seller provided the address of his store, which ABBAS then sent to both AGBABIAKA and FASHOLA. ABBAS told FASHOLA that AGBABIAKA would meet her at the watch store and provided her AGBABIAKA's phone number. ABBAS also told

AGBABIAKA that "U go meet morayo there," referring to FASHOLA's nickname (Morayo).

101. On January 4, 2020, ABBAS and AGBABIAKA discussed how to get the watch to ABBAS in Dubai, U.A.E. Specifically, ABBAS initially purchased a ticket, and arranged a visa, for AGBABIAKA to fly the watch to the U.A.E. When AGBABIAKA told him she could not, and suggested that she could mail the watch to ABBAS, ABBAS rejected that idea, saying, "I'm not taking no risk sending a quarter million dollar watch." AGBABIAKA reminded ABBAS, "I remembered I mailed you the patek [¶] And you get am." (I know based on review of articles on the internet that Patek Philippe is another high-end watch manufacturer.) ABBAS rejected the idea, saying, "That's 70,000 watch [¶] I need that watch here tomorrow [¶] Tomorrow is Saturday[.] delivery won't come." Shortly thereafter, ABBAS told AGBABIAKA to meet "Morayo" (FASHOLA) at the airport, and that she would be bringing someone to fly the watch to Dubai.

102. At approximately the same time, FASHOLA sent ABBAS a photograph of a passport of Coconspirator 5, as well as sending the name and date of birth of Coconspirator 5. ABBAS asked FASHOLA to "Help me call bola [i.e., BOLATITO AGBABIAKA] to arrange where is best to take the watch and go airport straight." ABBAS then told FASHOLA that he was purchasing a ticket for Coconspirator 5, and later sent her a screenshot of a booking confirmation page for Coconspirator 5's flight from JFK to Dubai.

103. After FASHOLA confirmed AGBABIAKA had brought her the Richard Mille watch, ABBAS asked her to take a photo of the watch and warranty certificate. FASHOLA responded by providing the photograph pictured below.



104. Shortly thereafter, FASHOLA wrote she was headed to the airport and asked for ABBAS' WhatsApp phone number to provide to Coconspirator 5. FASHOLA also provided Coconspirator 5's phone number and told ABBAS, "He boarded the plane. His name is [nickname for Coconspirator 5]. Plz be at the airport waiting for him. Its his first time Traveling alone." ABBAS told FASHOLA that he already spoke to Coconspirator 5 and had arranged a "VIP concierge" to get Coconspirator 5 from the plane.

105. ABBAS contacted Coconspirator 5 after he landed in Dubai, asking if Coconspirator 5 had gotten past "immigration" and instructing him to "Wear watch on wrist at all times here no need to take off for security point."

106. On January 6, 2020, ABBAS confirmed to the New York Watch Seller that he had received the watch, and stated he had just purchased a yellow strap for it. ABBAS also sent the following photograph of the Richard Mille watch and new strap, which records indicate ABBAS purchased at the Dubai Mall for approximately $550.

107. On January 13, 2020, ABBAS posted a photograph on Instagram, pictured below, wearing and mentioning the Richard Mille watch.

3. JUMA, ABBAS, CHIBUZO, and Others Conspired to Defraud the Victim Businessperson of $299,983.58

108. On December 26, 2019, CHIBUZO sent ABBAS a screenshot of a messaging conversation with another coconspirator. In that conversation, CHIBUZO stated "Hush and I spoke" and "We will need something like wells Fargo offshore website. Where the client can log in online and attempt a transfer." In other words, the message discussed creating a fake Wells Fargo bank website, which ABBAS would then send to the Victim Businessperson to convince the Victim Businessperson that funds had been deposited into his/her account, in order to fraudulently induce the Victim Businessperson to make a further payment.

109. On January 4, 2020, CHIBUZO sent a message to ABBAS containing a "telephone banking" number that CHIBUZO stated would "blow the client mind." As further described below, this was to be a test of a fake banking automated telephone number that ABBAS would later send to the Victim Businessperson, which would report a monetary balance in an account that did not exist, in order to convince the Victim Businessperson that the promised funds were

finally being provided and fraudulently induce the Victim Businessperson to make a further payment.

110. On January 6, 2020, ABBAS sent JUMA the "telephone banking" information. The following day, January 7, 2020, after several calls with ABBAS, CHIBUZO told ABBAS to download a different communication application, TextMe, and asked ABBAS for the account number and name on the account that was opened. ABBAS provided the account number for the Canoga Park Wells Fargo Account opened by Coconspirator 3, and also the TextMe phone number +13477691770.

111. On January 8, 2020, CHIBUZO sent ABBAS a different "telephone banking" number, and sent the account number of the Canoga Park Wells Fargo Account and a purported pin code.

112. At approximately the same time, ABBAS asked JUMA in a message, "How much should we bill [the Victim Businessperson?]" After a brief discussion, ABBAS and JUMA settled on attempting to defraud the Victim Businessperson again for $570,000 initially and, afterwards, an additional $250,000. ABBAS provided JUMA with the new "telephone banking" number and asked JUMA to "Try like the last time." ABBAS then sent this "telephone banking" information to the Victim Businessperson, telling him/her to call the phone number to confirm that his/her money—the $15 million loan—was available in the Canoga Park Wells Fargo Account. ABBAS also told him/her that he was getting him/her "online access" to the funds.

113. The Victim Businessperson told ABBAS s/he contacted the "telephone banking" number and wrote, "OMG, I can't believe it, its true." After asking ABBAS whether s/he could transfer the funds to Qatar, and ABBAS confirming that s/he could, the Victim Businessperson wrote, "thank you so much[.]"

114. ABBAS separately forwarded a screenshot of this conversation to CHIBUZO and JUMA on WhatsApp. ABBAS then instructed JUMA to "Call [the Victim Businessperson] with congratulations too now please."

115. After calling the Victim Businessperson, JUMA responded to ABBAS with an audio message, which is transcribed below:

> Aye bro, uh, you have no idea. My God, [s/he] can't even breathe, bro. The excitement! [S/he] can't breathe talking to me, bro. It's crazy [*unintelligible*]! [S/he]'s really excited. [S/he] can't really talking to me. [S/he]'s even crying tears of joy. Congratulating me. Thanking me. Sorry if I had wronged you. Sorry if this what happened. What-what-what I told [him/her], "Listen, [sir/madam], you know this thing is not easy. And this is why you need to be very, uh, confidential about this whole process because it's not easy completely. It was a time [*unintelligible*] it was really bad for you to start talking about your progress with other people because you never know their intentions and all that." But, uh, I promised, uh, "Mr. Malik you need to do your best and pay him his charges." That he has been on our side and helpful. [S/he]'s like, "I'll do it just now." So, [s/he]'s very happy, bro.

116. ABBAS then asked JUMA, "Are u proud of me or no?" JUMA responded, in part, "It's a perfect job bro."

117. Also on January 8, 2020, CHIBUZO sent ABBAS a photograph of a fake Wells Fargo banking site that he was working with a "website guy" to create, to further defraud the Victim Businessperson. ABBAS asked CHIBUZO when they should provide the fake website to the Victim Businessperson. CHIBUZO responded that they should provide the website to the Victim Businessperson "Tonight," and added that he was "working on storyline." ABBAS told CHIBUZO, "I need story line in 10mins." CHIBUZO then provided a photograph

of what appeared to be a Wikipedia webpage discussing "U.S. State Non-resident Withholding Tax". Shortly thereafter, ABBAS sent that photograph to the Victim Businessperson, claiming that s/he would need to pay a tax of USD $575,000 on the loan to have it cleared. The Victim Businessperson responded, "Sorry but this is too much." ABBAS then separately sent screenshots of his conversation with the Victim Businessperson to both CHIBUZO and JUMA.

118. On January 9, 2020 the Victim Businessperson told JUMA s/he wanted the loan money and asked him to find a way to avoid having to pay the tax of $575,000. JUMA sent screenshots of this conversation to ABBAS.

119. On January 10, 2020, ABBAS and JUMA discussed reducing the amount the Victim Businessperson should be asked to pay. JUMA stated he would tell the Victim Businessperson that the owners of the money being loaned would assist in paying part of the taxes.

120. On January 9 and 10, 2020, CHIBUZO complained to ABBAS that ABBAS had not paid for the work that was being done on the fake website. On January 10, 2020, CHIBUZO called ABBAS and provided the address for the fake Wells Fargo bank website. Soon thereafter, on January 13, 2020, JUMA and ABBAS learned that CHIBUZO had contacted the Victim Businessperson directly to tell him/her that ABBAS was "fake." (The details of the falling out between JUMA and ABBAS, on the one hand, and CHIBUZO, on the other hand, are discussed in Section III.B.4, which describes how ABBAS arranged to have KYARI arrest and imprison CHIBUZO, and requested that KYARI beat CHIBUZO badly, in retaliation for CHIBUZO's interference in the fraud scheme.)

121. ABBAS and JUMA later discussed how to stop the Victim Businessperson from flying to the United Kingdom to confirm that there were funds in the purported Wells Fargo account. JUMA also mentioned that he told the

Victim Businessperson to keep things quiet, and to not tell anyone or ask anyone about the status of the loan.

122. On January 13, 2020, the Victim Businessperson told ABBAS that s/he would agree to pay $440,000 in taxes. A few days earlier, starting on January 11, 2020, ABBAS had asked FASHOLA to help him find an account to receive additional funds. FASHOLA replied indicating "Would have to be business and the person would want a cut."

a. FASHOLA discussed with ABBAS laundering funds on other occasions, as well. For example, on March 26, 2020, ABBAS and FASHOLA discussed her purchase of a new home with a mortgage. In this discussion, ABBAS claimed it was hard for him to make a similar purchase "cos I'm not fully legitimately organized here." FASHOLA told ABBAS, "Yea that's why you should clean the money first [¶] It took me a few months to do that [¶] I basically pay Abby in cash and she writes me checks. And also ElysianD I put a lot of money in and just sell back the items so it can look clean."

i. Based on bank records, ElysianD LLC is a company owned by FASHOLA.

b. On April 1, 2020, ABBAS sent FASHOLA a screenshot of a conversation with an apparent romance scam victim. FASHOLA asked if this was a "Client?," which, as discussed in paragraph 73.a, is a term that persons committing online fraud sometimes use to describe a fraud victim. ABBAS confirmed the person was, and then complained that the bank account he was sent had "messed things up" because it had already been flagged by the bank.

i. Based on my training and experience, I know that romance scams 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. On May 19, 2020 ABBAS asked FASHOLA to "Give me a company for dating work [¶] This one is less % but money will come out 1000000%." FASHOLA responded "Yea the one I found they don't like the percentage[.] still looking." When ABBAS asked what percent the accountholder was charging for use of the account, FASHOLA responded "They want 50."

i. Based on my training and experience with investigations of Nigerian online fraud, "dating" is a term that persons committing fraud use to refer to what is described above as a romance scam.

d. In addition, on other occasions in 2020, ABBAS and FASHOLA discussed how much other persons would charge for receiving funds on behalf of ABBAS.

123. On January 14, 2020, after learning the Victim Businessperson agreed to pay additional money, ABBAS again asked FASHOLA for an account to receive additional funds. FASHOLA stated she was waiting for the person to send full account details. At around that same time, Coconspirator 5—a relative of FASHOLA—sent ABBAS the account information for a bank account of a person referred to herein as "Coconspirator 6" at TD Bank (the "Coconspirator 6 TD Bank Account").

124. Also, on January 14, 2020, ABBAS asked AGBABIAKA if he could use the AGBABIAKA Capital One Account again for "100k." AGBABIAKA agreed.

125. Later that day, ABBAS sent JUMA the account information for the AGBABIAKA Capital One Account and the Coconspirator 6 TD Bank Account, including the names of the accountholders, the account numbers, the routing

numbers, and the SWIFT codes. Shortly thereafter, JUMA sent the account information to the Victim Businessperson, and, about 30 minutes later, the Victim Businessperson sent the account information to ABBAS. ABBAS then confirmed to the Victim Businessperson that these were the accounts s/he should use.

126. Over the next several days, ABBAS and JUMA each kept in frequent contact with the Victim Businessperson as s/he attempted to raise funds to pay the purported taxes. Then, on February 4, 2020, JUMA told the Victim Businessperson to send money to Okatch, in Kenya. Between approximately February 5 and 10, 2020, the Victim Businessperson sent $299,983.58 to the bank account of Okatch in seven separate transactions.

127. On February 10, 2020, JUMA told ABBAS that the money had been sent to Nairobi and would be available the next day. At approximately the same time, ABBAS asked AGBABIAKA if her Capital One Bank account was still available for him to send money, which AGBABIAKA confirmed it would be.

128. On February 12, 2020, JUMA told ABBAS that because JUMA had not received money from the $330,000 sent by the Victim Businessperson (which ABBAS used to purchase the Richard Mille watch and St. Kitts citizenship, among other laundering), everything was balanced out with this second $300,000 sent to him. After arguing about the amounts that the Victim Businessperson had agreed to pay, ABBAS sent JUMA photographs showing documents relating to several loans ABBAS took out from a watch company located in Dubai (the "Dubai Watch Company"). One of the photographs indicated that ABBAS put up a "RM1103 Full gold Titanium" watch as collateral. (ABBAS' loans from the Dubai Watch Company, and attempts to repay them, are described below in paragraphs 166 to 178.)

4. After Consulting with JUMA, ABBAS Arranged to Have KYARI Imprison CHIBUZO in Nigeria in Retaliation for, and to Prevent Him from, Trying to Coopt the Victim Businessperson

129. As discussed in paragraph 120, JUMA and ABBAS had a falling out with CHIBUZO after CHIBUZO felt that he was being underpaid (or had not been paid) for work on the fake Wells Fargo website, and then contacted the Victim Businessperson directly. ABBAS then arranged to have KYARI arrest and imprison CHIBUZO in Nigeria for attempting to redirect fraudulent proceeds intended for ABBAS and JUMA to himself, to keep CHIBUZO from interfering with the scheme. This section discusses those events and KYARI's involvement in the conspiracy.

130. On January 13, 2020, the Victim Businessperson contacted JUMA about a person who had contacted the Victim Businessperson about the loan, stating "This number is calling me but I didn't answer." The Victim Businessperson also provided JUMA a screenshot of and forwarded additional conversations between the Victim Businessperson and CHIBUZO, who was using the U.S. phone number 3054405586. That phone number was the same phone number used by CHIBUZO to send ABBAS information about the fake Wells Fargo website described earlier. In the messages, CHIBUZO sent the Victim Businessperson's passport, and claimed to be "trying to help" the Victim Businessperson.

131. JUMA forwarded these messages from the Victim Businessperson to ABBAS, who responded, "I will deal with him." At approximately the same time, ABBAS asked CHIBUZO for a phone number on which to call him. Two minutes later, ABBAS sent the phone number on which he contacted CHIBUZO (which CHIBUZO had previously also sent to ABBAS) to KYARI without providing any

additional context. Just before forwarding the phone number to KYARI, ABBAS placed a nearly five-minute call to KYARI, using the phone number described in paragraph 136.

132. A short time later, ABBAS told JUMA, "setting him up already [¶] He will learn." JUMA replied, "He almost messed it up bro," to which ABBAS responded "They are working on it already."

133. Approximately an hour later, CHIBUZO responded to ABBAS' message requesting his phone number by providing another phone number. ABBAS also sent this number to KYARI without providing any additional context in the message.

134. On January 15, 2020, this time using WhatsApp, ABBAS sent an audio recording to KYARI, stating, essentially, that he wanted to remind KYARI about what they discussed earlier.

135. On January 16, 2020, ABBAS sent the following threats to CHIBUZO:

> I dey always tell people to think well before they offend me and make them make sure they fit stand the consequences when the time comes. I won't say more than that but very soon, very very soon, the wrath of my hands shall find you and when it does, it will damage you forever
>
> At this point I no get discussion with you, u have committed a crime that won't be forgiven, that is punishable and you shall receive die punishment in due time I swear with my life you will regret messing with me, you will even wish you died before my hands will touch you.

136. Also on January 16, 2020, ABBAS sent a message to KYARI on WhatsApp, and then placed five calls to another phone number (+2348060733588)

that was listed as "ABBA KYARI." Call records show that the last three of the calls were answered and that one of the calls lasted more than two minutes. Shortly after that, ABBAS received a message from KYARI, confirming "We would pick him today or tomorrow." ABBAS wrote, "I will take care of the team also after they pick him up." KYARI confirmed "Yes ooo."

a. Based on the conversation described in paragraphs 143 to 145, ABBAS planned to pay the Nigeria Police Force officers who arrested CHIBUZO for that service.

b. This was not the only time that ABBAS arranged payments with KYARI. On May 20, 2020, ABBAS sent KYARI transaction receipts for two transactions from accounts at Nigerian banks (GTBank and Zenith Bank) of a person ABBAS knew in the U.A.E.—a person also arrested with ABBAS in ABBAS' apartment in the U.A.E. by Dubai Police on June 9, 2020—to the Nigerian bank accounts of another person in Nigeria. The amounts on the transaction receipts totaled 8 million Nigerian Naira, which was approximately $20,600 based on publicly available exchange rate information.

137. Attempting to reason with ABBAS, on January 18, 2020, CHIBUZO recounted for ABBAS all the assistance he had provided in the scheme to victimize the Victim Businessperson, including creating the "power of attorney" document (see paragraphs 67–68), devising a story to tell the Victim Businessperson (see paragraph 117), and facilitating the creation of the "telephone banking" number (see paragraphs 109–116) and fake Wells Fargo website (see paragraph 117).

138. As discussed in paragraph 32.b, on January 20, 2020, KYARI sent to ABBAS biographical, identifying information for CHIBUZO, along with a photograph of him. In a conversation immediately following, ABBAS confirmed "that is him sir." KYARI stated, "We have arrested the guy . . . He is in my Cell

now [¶] This is his picture after we arrested him today." (The below image is a cropped version of the photograph that KYARI sent to ABBAS.)

139. KYARI sent the biographical information about, and photograph of, CHIBUZO to ABBAS using two different WhatsApp numbers—the second of which KYARI said was his "private number." From that point on, KYARI and ABBAS primarily discussed the arrest and detention of KYARI through WhatsApp on this "private number."

140. After receiving the photograph of CHIBUZO, ABBAS stated, "I want him to go through serious beating of his life." KYARI responded, "Hahahaha," and ABBAS replied, "Seriously sir." KYARI then asked for details about what CHIBUZO did "on audio," which KYARI said was "So that we will know what to do."

141. In response to KYARI's question about what CHIBUZO had done to ABBAS, ABBAS sent KYARI an audio message, which is transcribed here, describing how CHIBUZO had tried to steal away a fraud victim (i.e., "the job") from him:

> What he did is, I have one job. The job want to pay me 500, umm, 75,000 dollars [i.e., $575,000]. He went to message the job behind me because I told him to help me make one document for me to give the job. Then he went—he has a—I gave him the details. Then he went to message the job behind my back and try to divert the money and in this process he tell the job because of the documents he gave me that I gave the job, he tell the job, "These document they sent to you before. These people are fake. This money—is me who can help you to get it. Come to me le—bring this money you want to pay these people to me. I'm the only one who can help you," and all these things to divert the job for himself.

142. After listening to the message, KYARI wrote, "Ok I understand [¶] But he has not succeeded." ABBAS claimed CHIBUZO had taken some money, and provided KYARI with two screenshots, one of which contained the phone number 3054405586 (the phone number CHIBUZO used to contact the Victim Businessperson). The screenshots showed a person contacting the Victim Businessperson and stating that he was providing information to try to "help[]" the Victim Businessperson. KYARI responded, "Yeah I understand." KYARI did not request other information or evidence relating to CHIBUZO's role in the scheme, ask questions about the nature of the transaction, or ask about why CHIBUZO told the Victim Businessperson that ABBAS was "fake."

143. ABBAS then told KYARI, "Now the [Victim Businessperson] was skeptic to pay me the money cos he keep attacking the [Victim Businessperson] from his end. Now I can handle the [Victim Businessperson] correctly." ABBAS further told KYARI that he wanted to pay money to send CHIBUZO to jail for a long time, stating "Please sir I want to spend money to send this boy to jail, let him go for a very long time." KYARI responded, "Ok bro [¶] I understand [¶] I will

discuss with my team who arrested him . . . And handling the case [¶] We will do something about it."

144. ABBAS responded, "Let me know how I can send money to the team sir[.] let them deal with him like armed robber." KYARI responded, "OK I will send their account details to u." ABBAS further wrote, "He betray me and try to take food out my mouth, this is great punishable sin," and KYARI responded, "Yeah bro." ABBAS then continued, "I want him to suffer for many years." KYARI responded, "Hahahaha [¶] Hahahaha."

145. Approximately six minutes later, KYARI provided the account information for a bank account at a Nigerian bank, Zenith Bank, in the name of a person other than KYARI himself. ABBAS responded "Ok sir, tomorrow by noon," indicating that he would make the payment to KYARI's team by the next day.

146. On the same day, ABBAS sent JUMA the photograph of CHIBUZO in custody, which KYARI had sent.

147. Approximately a month later, on February 19, 2020, KYARI sent a message to ABBAS, saying, "Hello hush with [sic] need to talk about the subject under detention with me." ABBAS asked "Should I call u on this number sir?" to which KYARI replied "Yes call me."

148. The following day, KYARI sent ABBAS multiple photographs of CHIBUZO to ABBAS, including close-up photographs showing a rash or skin disease on CHIBUZO's torso and arms. ABBAS responded, "I don pity am, make them leave am from Tuesday." KYARI wrote, "Ok bro, they just brought him from hospital. The fever and the rashes is giving him serious Wahala [¶] He got the disease from other suspects in the cell." ABBAS responded, "I see am, I no too pity am [¶] That's what people like him deserve but I go forgive am for God sake." In other words, based on my training and experience with Nigerian Pidgin,

ABBAS was essentially stating, in part, "I don't pity him. That's what people like him deserve, but I will forgive him for God's sake."

a. Based on the date of the messages and later discussion described in paragraph 150, ABBAS was—on Thursday, February 20, 2020—requesting that KYARI not to release CHIBUZO until Tuesday, February 25, 2020.

149. ABBAS then told KYARI that CHIBUZO's girlfriend messaged him, trying to raise one million Naira to secure CHIBUZO's release, and said ABBAS promised to contribute 100,000 Naira. KYARI stated "They were thinking it's normal arrest that is why they think money can remove him . . . No money can remove him here [¶] Hahahaha." ABBAS added, "But it's better for them to think that way, I like it like that," and KYARI responded, "Yeah."

150. ABBAS then said, "No problem sir from Tuesday he can go," apparently giving KYARI his blessing to release CHIBUZO from custody. KYARI responded, "Ok bro [¶] We will also keep his phone and other gadgets for some weeks." ABBAS responded, "Yes those ones they should not give him again, those ones are gone . . . Make he no see those ones again for life," instructing KYARI not to return CHIBUZO's electronic devices. KYARI responded, "Yes he will not see it [¶] Again," indicating that he would accede to ABBAS' request.

5. <u>ABBAS Defrauded the Victim Businessperson of an Additional $180,000</u>

151. On February 14, 2020—shortly after JUMA had told ABBAS that he would not share the $299,983.58 that he had received from the Victim Businessperson with ABBAS—the Victim Businessperson confided in ABBAS, who was still pretending to be "Malik" the Wells Fargo banker, that s/he believed JUMA had been scamming her/him. ABBAS claimed to be surprised and falsely

promised to help her/him. ABBAS then defrauded the Victim Businessperson of an additional $180,000, conspiring with AGBABIAKA, Coconspirator 5, and Coconspirator 6. This section describes this portion of the fraud scheme.

152. On February 14, 2020, the Victim Businessperson confided to ABBAS that s/he had lost more than $1,000,000 in the fraud scheme, and wrote, "I know that you think I am stupid but I trusted [JUMA] and now I'm going bankrupt." ABBAS—as "Malik"—responded, "Wow 😳, over one million?," and falsely promised to try to help the Victim Businessperson.

153. ABBAS then claimed to have spoken to his supervisor who was willing to reduce the amount the Victim Businessperson would need to pay to $180,000, provided that the Victim Businessperson agreed to keep their discussions confidential.

154. On February 15 and 16, 2020, JUMA asked ABBAS if he had spoken to the Victim Businessperson or was planning anything. In response, ABBAS made it seem like there was a "hold up" because they could not afford the "tools" to show the Victim Businessperson, in order to convince him/her to send them more money.

155. However, at approximately this same time, ABBAS was conversing with the Victim Businessperson, disparaging JUMA and stating that JUMA had stolen the funds he was supposed to send to ABBAS to release the Victim Businessperson's purported loan. ABBAS also told the Victim Businessperson to "try and get the $180,000 sent before the end of the month and [JUMA] will be put to shame and God will deal with him also."

156. On February 17, 2020, ABBAS provided the Victim Businessperson with the account information for the AGBABIAKA Capital One Account and the Coconspirator 6 TD Bank Account, telling him/her to send $100,000 and $80,000 to the accounts, respectively.

157. On February 21 through February 25, 2020, the Victim Businessperson sent messages to JUMA, saying "you have tricked me" and calling JUMA a thief. However, the messages indicated that the Victim Businessperson continued to trust and communicate with ABBAS. On March 1, 2020, the Victim Businessperson sent to ABBAS additional communications s/he received from a phone number in the United Kingdom, which was purportedly connected to JUMA. ABBAS falsely told the Victim Businessperson, "I'm forwarding it my boss so they can report it to the FBI . . . We are making a case for [JUMA] already." ABBAS then requested that the Victim Businessperson send him any communications that the Victim Businessperson had with JUMA, "I am doing [sic] to file them all and have the FBI start a case on it as soon as possible."

a. On March 3, 2020, JUMA sent ABBAS a message stating the Victim Businessperson had people calling the "Nairobi office," saying they were scammers. ABBAS replied, "That's what happens when u leave a client hanging, u take the money and no follow up. Gives the client time to think and involve people."

158. On March 1, 2020, within approximately ten minutes of telling the Victim Businessperson that he would report JUMA to the FBI, ABBAS asked the Victim Businessperson when the wire transfers totaling $180,000 would occur. The Victim Businessperson responded that they would be completed by the next day.

159. On March 2, 2020, the Victim Businessperson sent ABBAS photographs of wire transfer confirmations, showing a wire transfer of $100,000 to the AGBABIAKA Capital One Account and $80,000 to the Coconspirator 6 TD Bank Account. Bank records from both accounts also confirmed the transactions.

160. On March 3, 2020, ABBAS sent the photograph of the transfer to the Coconspirator 6 TD Bank Account to FASHOLA.

161. On March 11, 2020, the Victim Businessperson contacted ABBAS to confirm the money s/he sent had been received and to ask the next steps in the process, so that s/he could finally receive the $15 million loan to build the international school. ABBAS claimed to have gone to the IRS to pay the tax, and said that his boss would be able to send the wire the following day.

162. On March 12, 2020, ABBAS told the Victim Businessperson that his boss, an individual he said was named "Yousif," would be contacting the Victim Businessperson using the phone number 19294345705. FASHOLA provided this phone number and a pin code to ABBAS approximately 10 minutes before ABBAS sent that phone number to the Victim Businessperson.

163. At approximately the same time, the Victim Businessperson began communicating with "Yousif" over WhatsApp. In these chat messages, "Yousif" explained that the Victim Businessperson would need to pay additional "transfer charges." Shortly thereafter, the Victim Businessperson confronted ABBAS about "Yousif" and the additional funds he was requesting, saying, "Sorry Mr Malik but I'm not gonna pay more and I'm out of this game . . . I'll will stop all my communication with you . . . You are doing what exactly [JUMA] did . . . I'm now 100% sure that you and [JUMA] and Yosif [sic] and [Coconspirator 1] are all one team." Despite ABBAS' protestations, the Victim Businessperson did not communicate with ABBAS, JUMA, or "Yousif" after March 12, 2020.

i. ABBAS, FASHOLA, and AGBABIAKA Laundered the $180,000 Received from the Victim Businessperson

164. Bank records show that the $180,000 received from the Victim Businessperson were laundered in a variety of ways, including through cash withdrawals and cashier's checks. Ultimately, based on messages and photographs sent and received by ABBAS, it appears that much of the funds that ABBAS received went to paying the Dubai Watch Company, in an effort to receive back

the Richard Mille watch that he had collateralized in loans. ABBAS received the watch back, but then provided it back to the Dubai Watch Company while one of the wire transfers was in the process of being cleared, and ultimately agreed to sell the watch to pay his remaining debt. The laundering of the funds is described in this section.

165. Bank records show that much of the $100,000 sent to the AGBABIAKA Capital One Account was withdrawn within a few days. Specifically, a $50,000 cashier's check made payable to "BOLATITO T AGBABIAKA" was purchased on March 3, 2020, and there were also cash withdrawals of $15,000 on March 3, 2020, $10,000 on March 5, 2020, and $7,000 on March 7, 2020. Records from the AGBABIAKA TD Bank Account showed that the $50,000 cashier's check was deposited into the account on March 3, 2020.

166. ABBAS sent a message to an employee of the Dubai Watch Company (the "Dubai Watch Seller") on March 2, 2020, asking for account details to where he could wire transfer funds, and stating, "My sister have capital one bank."

a. In at least one other messaging conversation, ABBAS referred to AGBABIAKA as his "sister."

167. On March 4, 2020, the Dubai Watch Seller provided a photograph showing bank account details for accounts at Emirates NBD Bank and National Bank of Fujairah. ABBAS sent the image to both AGBABIAKA and Coconspirator 5.

168. Approximately seven hours later AGBABIAKA sent ABBAS a photograph of a wire transfer confirmation from the AGBABIAKA TD Bank Account, showing a wire transfer of $50,000 to the Dubai Watch Company's account at Emirates NBD Bank. (Bank records from the AGBABIAKA TD Bank Account confirm this transaction.) ABBAS then sent that photograph to the Dubai Watch Seller.

169. On March 5, 2020, ABBAS sent a photograph to the Dubai Watch Seller of a second wire transfer of $50,025 from the Coconspirator 6 TD Bank Account.

170. On March 5, 2020, ABBAS sent a screenshot of his messaging conversation with the Dubai Watch Seller to FASHOLA, telling her "Bola [i.e., AGBABIAKA] sent 50k to the watch guy, New York did 50k to him too, I owe 54k balance now to get my watch back." ABBAS then noted how he had not been posting to social media because people would be expecting him to be wearing his watch, stating, "people started talking that I didn't buy the watch[, that] I just used someone['s] watch for a few days and returned it [¶] Can u imagine[?]."

171. Over the next few days, after confirming AGBABIAKA's wire transfer had arrived, ABBAS frequently checked with the Dubai Watch Seller to see if the wire from the Coconspirator 6 TD Bank Account had arrived. ABBAS was able to retrieve his watch from the Dubai Watch Company and, on March 9, 2020, sent FASHOLA a video of him wearing it again, and a message saying, "U know God is so good."

172. On March 9, 2020, the Dubai Watch Seller sent ABBAS an audio message requesting that ABBAS send the SWIFT confirmation number for the wire transfer from the Coconspirator 6 TD Bank Account. ABBAS then sent a message to Coconspirator 5 requesting this information. A few hours later, FASHOLA sent a message to ABBAS providing photographs of the wire confirmation documents showing the transfer from the Coconspirator 6 TD Bank Account, stating "[Coconspirator 5] said to send you this." ABBAS then sent a photograph of the wire transfer confirmation to the Dubai Watch Seller.

173. On March 12, 2020, the Dubai Watch Seller complained to ABBAS that he still had not received the wire transfer from the Coconspirator 6 TD Bank

Account. ABBAS offered to return the watch while the wire transfer was being straightened out.

174. Later that day, Coconspirator 5 sent ABBAS a screenshot from the Coconspirator 6 TD Bank Account showing a return of funds in the amount of $49,987. ABBAS then sent the screenshot to the Dubai Watch Seller.

175. In a conversation with ABBAS on March 12, 2020, FASHOLA stated that the address used in the wire transfer order was wrong and said, "they will resend it." On March 13, 2020, Coconspirator 5 sent ABBAS a photograph of a wire transfer confirmation the Coconspirator 6 TD Bank Account—this time for $40,025. ABBAS then sent that photograph to the Dubai Watch Seller.

176. Over the coming days, ABBAS again checked with the Dubai Watch Seller to see if the funds had been received. On March 19, 2020, the Dubai Watch Seller stated that his bank told him that the wrong IBAN number was written in the transfer so the money would probably be sent back again.

177. On March 21, 2020, ABBAS sent an audio message to the Dubai Watch Seller stating the money was back in the United States. ABBAS stated that, due to COVID-19, no one was able to get to the bank to send the wire again. ABBAS again gave the Dubai Watch Seller his watch as collateral on about April 2, 2020.

a. Records for the Coconspirator 6 TD Bank Account confirmed the two aforementioned attempted outbound wire transfers and recalls. The records revealed that, between March 3 and 27, 2020, $67,467.46 was withdrawn from the account in seven cash withdrawals.

178. On April 26, 2020, ABBAS asked the Dubai Watch Seller to put the Richard Mille watch up for sale for $230,000, but suggested in other communications that he would accept a price as low as $190,000.

IV. CONCLUSION

179. Based on the foregoing, there is probable cause to believe that ABBAS, JUMA, CHIBUZO, KYARI, FASHOLA, and AGBABIAKA participated in a conspiracy to fraudulently obtain and launder money obtained from the Victim Businessperson, in violation of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) and 18 U.S.C. § 1956(h) (Conspiracy to Engage in Money Laundering):

a. ABBAS directly interacted with the Victim Businessperson, falsely claiming to be a Wells Fargo banker named "Malik." ABBAS also orchestrated the receipt and laundering of funds from the Victim Businessperson to and through bank accounts in the United States, as well as the creation and use of the Canoga Park Wells Fargo Account. ABBAS ultimately received the proceeds of the fraud scheme in a variety of ways, including as cash into the Nigerian bank account of another person, purchase of a luxury Richard Mille watch, and purchase of St. Kitts citizenship and a passport. After the Victim Businessperson began to suspect that JUMA had defrauded him/her, ABBAS purported to work with the Victim Businessperson to report JUMA's fraudulent conduct to the FBI, but, in reality, defrauded the Victim Businessperson out of additional funds, which ABBAS then laundered.

b. JUMA worked closely with ABBAS to defraud the Victim Businessperson, interacting directly with the Victim Businessperson and directing the Victim Businessperson to make payments to bank accounts in the United States and Kenya. In particular, JUMA received initial payments from the Victim Businessperson and then involved ABBAS in the fraud scheme. JUMA received

and laundered the money that the Victim Businessperson sent to the Okatch bank account in Kenya.

c. CHIBUZO interacted directly with ABBAS, as he worked with ABBAS and JUMA to create various artifices—including a fraudulent website and "phone banking" system—that would induce the Victim Businessperson to make additional payments to the coconspirators. CHIBUZO was to be compensated by ABBAS for his involvement in the scheme. At one point, CHIBUZO felt that he was not being paid enough or in a timely manner, and contacted the Victim Businessperson directly, saying that ABBAS and JUMA had scammed the Victim Businessperson, in an attempt to get the Victim Businessperson to make future fraudulent payments to CHIBUZO and not to ABBAS and JUMA.

d. KYARI, a Deputy Commissioner of the Nigeria Police Force, arranged the arrest of CHIBUZO at the request of ABBAS to prevent CHIBUZO from interfering in the scheme defrauding the Victim Businessperson. KYARI had CHIBUZO held in custody for a month and also facilitated payments from ABBAS to the Nigeria Police Force personnel who arrested CHIBUZO, in order to ensure CHIBUZO's continued arrest, thereby preventing CHIBUZO from notifying the Victim Businessperson of ABBAS' and JUMA's fraudulent scheme and preventing CHIBUZO from hijacking the scheme for his own benefit. KYARI's knowing involvement in the scheme allowed ABBAS and JUMA to continue defrauding the Victim Businessperson undetected and receive money obtained from the Victim Businessperson after it was laundered.

e. FASHOLA and AGBABIAKA knowingly assisted ABBAS in receiving money from the Victim Businessperson into bank accounts in the United States and then laundering the funds received in a variety of ways, including

through cash withdrawals, wire transfers, use of illicit money exchangers, and purchases of items and other things of value.

ANDREW JOHN INNOCENTI
Special Agent,
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on February 12, 2021.

Patricia Donahue

THE HONORABLE PATRICIA DONAHUE
UNITED STATES MAGISTRATE JUDGE