

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS
(KANSAS CITY DOCKET)**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 17-20021-01/02 CM/TJJ

RODRIECH NYUGAB NKARAKWI

**a/k/a Neal Wyatt,
a/k/a Jerry Johnson,
a/k/a Anthony Davidson,
a/k/a Christopher Milner,
a/k/a Dawson Reynolds,
a/k/a Anthony Raymond**

and

GLADYS NKOME

**a/k/a Porsha Madeah,
a/k/a Regina Magleaton,
a/k/a Tisha Morgan,
a/k/a Jessica Malika,
a/k/a Williams Brittany,
a/k/a Neema Latifah,
a/k/a Brenda Arundel,
a/k/a Kimberly Blackwell,
a/k/a Shamicka Lawrence,
a/k/a Augustine Carolyn,
a/k/a Alice Shelby,
a/k/a Crystal Mariah,
a/k/a Regina Mapple,
a/k/a Rebecca Nemaya,
a/k/a Gina Williams,
a/k/a Julia Thompson,
a/k/a Vanessa Kinavi,
a/k/a Rahman Edna,
a/k/a Shelly Blackwell,
a/k/a Crystal Hardy,
a/k/a Samantha Stiwe,
a/k/a Kimberly Njong,
a/k/a Jennifer Tawa,**

Defendants.

INDICTMENT

The Grand Jury charges:

At all times relevant to the charges in this Indictment:

I. INTRODUCTION

1. Youtube.com was a video sharing site where users could post videos to the Internet to be viewed by others across the world.

2. Western Union and MoneyGram were global payment service companies that allowed customers to send money via wire transfers from one location to another. Both companies allowed customers to send money to individuals in another state via wire transfer. The receiving person was able to go to one of the company's partners, frequently grocery stores, pharmacies, and other stores, to pick up the wire transfer.

II. THE SCHEME TO DEFRAUD

3. At some point prior to January 2015, a group of persons located both inside the United States and in the Republic of Cameroon, devised a scheme to defraud others by offering goods and services for sale on the Internet, then failing to provide the goods and services after payment was received.

4. The conspirators advertised the goods and services on the Internet, including Youtube.com. The goods and services included illegal identification documents (such as passports, visa documents, lawful permanent resident cards, and drivers licenses), but also included other items such as pets, medications, prescription drugs, automobiles, and chemicals.

5. When contacted by a prospective buyer, the conspirators directed the prospective buyer to send money via Western Union or Money Gram to a particular individual, who was a co-conspirator. The co-conspirator picked up the money, often times using false identities.

6. Defendants Rodriech Nyugab Nkarakai and Gladys Nkome were persons who picked up money as part of the conspiracy.

Count One
WIRE FRAUD CONSPIRACY

7. Paragraphs 1 through 6 are incorporated and realleged herein.

8. Beginning from on or about January 1, 2015, and continuing until on or about May 10, 2017, the exact dates being approximate and unknown, in the District of Kansas and elsewhere, the defendants,

RODRIECH NYUGAB NKARAKWI and
GLADYS NKOME,

knowingly and willfully conspired and agreed with each other and with other persons known and unknown to the Grand Jury to commit and conceal offenses against the United States by voluntarily and intentionally devising and executing and attempting to execute by interstate wire a scheme to defraud and obtain money and other property by means of false and fraudulent pretenses, representations, and omissions of material fact, in violation of Title 18, United States Code, Sections 1343 and 2.

OBJECT OF THE CONSPIRACY AND MANNER AND MEANS

9. The object of the conspiracy and scheme to defraud was to enrich the conspirators by obtaining money from individuals through false and fraudulent

pretenses, representations, and omissions of material fact.

10. It was part of the conspiracy, and in furtherance of it, that the conspirators offered goods and services for sale on the Internet.

11. Conspirators directed prospective buyers to send money via wire transfers. However, the conspirators did not provide the goods and services they sold.

12. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following.

a. In January 2015, a Homeland Security Investigations special agent, acting in an undercover capacity, responded to a Youtube.com video offering identification documents for sale. The agent agreed to a buy fraudulent United States passport, social security card, and birth certificate for \$1040, half of which was to be paid up front. The agent was told to provide payment for the documents via Western Union to Defendant Gladys Nkome located in the Baltimore, Maryland area. However, those instructions were changed and the agent was told to pay another person. The agent sent payment but never received the illegal identification documents.

b. On or about January 9, 2015, Defendant Nkome, using her real name, received \$220 via Western Union wire transfer in Maryland. The money was sent by the victim for the purchase of a puppy, which the victim never received.

c. On or about January 13, 2015, Defendant Nkome, using her real

name, received \$230 via Western Union wire transfer in Maryland. The victim sent the money for the purchase of chemicals, which the victim did not receive.

d. On or about April 30, 2016, Defendant Nkarakwi, using the alias “Anthony Davidson,” obtained \$935 via MoneyGram wire transfer at a Walmart in Laurel, Maryland.

e. On or about May 1, 2016, Defendant Nkarakwi, using the alias “Anthony Davidson,” obtained \$700 via MoneyGram wire transfer at a Walmart in Laurel, Maryland.

f. On or about May 3, 2016, Defendant Nkarakwi, using the alias “Anthony Davidson,” obtained \$100 via MoneyGram wire transfer at a CVS pharmacy in Laurel, Maryland.

g. On or about May 5, 2016, Defendant Nkarakwi, using the alias “Anthony Davidson,” obtained \$100 via Western Union wire transfer at a Rite Aid pharmacy in Langley Park, Maryland. The victim sent the money for the purchase of a Yorkie dog, which the victim did not receive.

h. On or about May 6, 2016, Defendant Nkarakwi, using the alias “Anthony Davidson,” obtained \$210 via Western Union wire transfer at a Food Lion grocery store in Elkridge, Maryland. The victim sent the money for the purchase of parrot eggs, which the victim did not receive.

i. On or about May 6, 2016, Defendant Nkarakwi, using the alias “Anthony Davidson,” obtained \$500 via MoneyGram wire transfer at a Walmart in Maryland. The victim sent the money for the purchase of a Yorkie dog,

which the victim did not receive.

j. On or about May 12, 2016, Defendant Nkarakwi, using the alias “Dawson Reynolds,” obtained \$300 via Western Union wire transfer at a Rite Aid Pharmacy in Laurel, Maryland.

k. On or about May 25, 2016, Defendant Nkome, using the alias “Williams Brittany,” obtained \$499.00 via MoneyGram wire transfer at a Walmart in Hanover, Maryland.

l. On or about May 27, 2016, Defendant Nkarakwi, using the alias “Anthony Raymond,” obtained \$500 via MoneyGram wire transfer at a Walmart in Ellicott City, Maryland. The victim sent the money for the purchase of a Golden Retriever dog, which the victim did not receive.

m. On or about May 30, 2016, Defendant Nkarakwi, using the alias “Anthony Raymond,” obtained \$200 via MoneyGram wire transfer at a Walmart in Columbia, Maryland. The victim sent the money for the purchase of a Yorkie dog, which the victim did not receive.

n. On or about May 31, 2016, Defendant Nkarakwi, using the alias “Anthony Raymond,” obtained \$600 via MoneyGram wire transfer at a Walmart in Ellicott City, Maryland.

o. On or about June 11, 2016, Defendant Nkome, using the alias “Gina Williams,” obtained \$755 via MoneyGram wire transfer at a Walmart in Bowie, Maryland.

p. On or about June 11, 2016, Defendant Nkome, using the alias

Gina Williams,” obtained \$520 via a MoneyGram wire transfer at a Walmart in Bowie, Maryland.

q. On or about June 11, 2016, Defendant Nkome, using the alias, “Gina Williams,” obtained \$200 via a MoneyGram wire transfer at a Walmart in Bowie, Maryland. The victim sent the money for the purchase of a bulldog, which the victim did not receive.

r. On or about June 20, 2016, Defendant Nkome, using the alias, “Tisha Morgan,” obtained \$550 via MoneyGram wire transfer at a CVS Pharmacy in Wheaton, Maryland.

s. On or about June 23, 2016, Defendant Nkome, using the alias “Regina Magleaton,” obtained \$150 via Western Union wire transfer at a Walgreens in Laurel, Maryland. The victim sent the money for the purchase of a cat, which the victim did not receive.

t. On or about June 25, 2016, Defendant Nkome, using the alias, “Kimberly Njong,” obtained \$160 via MoneyGram wire transfer at a CVS Pharmacy in Columbia, Maryland.

u. On or about July 4, 2016, Defendant Nkome, using the alias “Porsha Madeah,” obtained \$300 via Western Union wire transfer at a Giant Food grocery store, in Beltsville, Maryland. The victim sent the money for the purchase of two bulldogs, which the victim did not receive.

v. On or about July 12, 2016, Defendant Nkome, using the alias, “Porsha Madeah,” obtained \$300 via Western Union wire transfer at a Giant

Food grocery store in Elkridge, Maryland. The victim sent the money for the purchase of a cat, which the victim did not receive.

w. On or about July 12, 2016, Defendant Nkome, using the alias, “Porsha Madeah,” obtained \$725 via Western Union wire transfer at a Giant Food grocery store in Elkridge, Maryland. The victim sent the money for the purchase of an English Bulldog, which the victim did not receive.

x. On or about October 11, 2016, Defendant Nkarakwi, using the alias, “Christopher Milner,” received \$350 via Western Union wire transfer at a Harvey’s Supermarket in Charlotte, North Carolina. The victim sent the money for the purchase of weight loss medication, which the victim did not receive.

y. On or about October 15, 2016, Defendant Nkarakwi, using the alias, “Christopher Milner,” obtained \$200 via Western Union wire transfer at a Harvey’s Supermarket in Charlotte, North Carolina. The victim sent the money for the purchase of an English Bulldog, which the victim did not receive.

z. On or about November 14, 2016, Defendant Nkarakwi, using the alias, “Neal Wyatt,” obtained \$265.95 via Western Union wire transfer at a Food Lion grocery store in Charlotte, North Carolina.

aa. On or about November 14, 2016, Defendant Nkarakwi, using the alias, “Neal Wyatt,” obtained \$184.16 via Western Union wire transfer at a Food Lion grocery store in Concord, North Carolina. The victim sent the money for the purchase of a Yorkie dog, which the victim did not receive.

bb. On or about March 31, 2017, Defendant Nkome possessed nineteen counterfeit driver's licenses which she used to obtain wire transfers.

cc. Counts two through six are additional manner and means of the conspiracy.

13. This was all in violation of Title 18, United States Code, Section 1349.

Count Two through Six
WIRE FRAUD

14. Paragraphs 1 through 13 are incorporated and realleged herein.

15. Beginning on or about January 1, 2015, and extending until on or about May 10, 2017, the exact dates being unknown, in the District of Kansas and elsewhere, the defendants,

RODRIECH NYUGAB NKARAKWI and
GLADYS NKOME,

having devised a scheme to defraud and obtain money by means of false and fraudulent pretenses, promises, and representations, caused to be transmitted by means of wire in interstate and foreign commerce, writings, signs, signals, and pictures, for the purpose of executing such scheme, as set forth below.

Count No.	Defendant	Date	Description of Wire
2	NKARAKWI	05/30/16	Wire transfer of \$150 via MoneyGram sent by victim in Osborne, Kansas to Maryland
3	NKARAKWI	05/31/16	Wire Transfer of \$550 via MoneyGram sent by victim in Osborne, Kansas to Maryland

4	NKARAKWI	11/14/16	Wire transfer of \$150 via Western Union sent by victim in Wichita, Kansas to North Carolina.
5	NKOME	05/26/16	Wire transfer of \$100 via MoneyGram sent by victim in Salina, Kansas to Maryland
6	NKOME	07/08/16	Wire transfer of \$900 via Western Union sent by victim in Bonner Springs, Kansas, to Maryland

16. Each was in violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL.

Dated: May 10, 2017

/s/ Foreperson
FOREPERSON OF THE GRAND JURY

D. Christopher Oakley #19248 for
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(It is requested that trial of the above captioned case be held in Kansas City, Kansas.)

Penalties:

Cts. 1-6: NMT 20 years imprisonment; NMT \$1,000,000 fine; NMT 3 years supervised release; \$ 100.00 special assessment