

238 00595-9

Grand Jury Witnesses:

Richard Schneider
Office of the State Inspector General

State of Georgia, Gwinnett Superior Court
September Adjourned Term, 2022 – Panel B

State of Georgia
Versus
UGOCHINYERE ANAZODO (Counts 1-4)
DOMINIQUE BEAULIEU (Counts 1 & 2)
WILLY OBENA (Counts 1 & 2)

Offenses:

- Count 1 Racketeering, O.C.G.A. §16-14-4(b)
- Count 2 Racketeering, O.C.G.A. §16-14-4(a)
- Count 3 Theft by Taking, O.C.G.A. §16-8-2
- Count 4 Money Laundering, O.C.G.A. §7-1-915

FILED IN OFFICE
CLERK SUPERIOR COURT
GWINNETT COUNTY, GA
2023 FEB 15 PM 1:58
TIANA P. GARNER, CLERK

TRUE Bill this 15 day of FEBRUARY, 2023.

Received in open court from the sworn Grand Jury
bailiff and filed in office.

This 15 day of FEBRUARY, 2023

Deputy Clerk, Gwinnett Superior Court

Christopher M. Carr, Attorney General

We the jury find the defendant

The defendant herein waives a copy of indictment, list of
witnesses, formal arraignment and pleads _____ guilty.

This _____ day of _____, 20____.

Defendant

Foreperson

Attorney for the Defendant

This _____ day of _____, 20____.

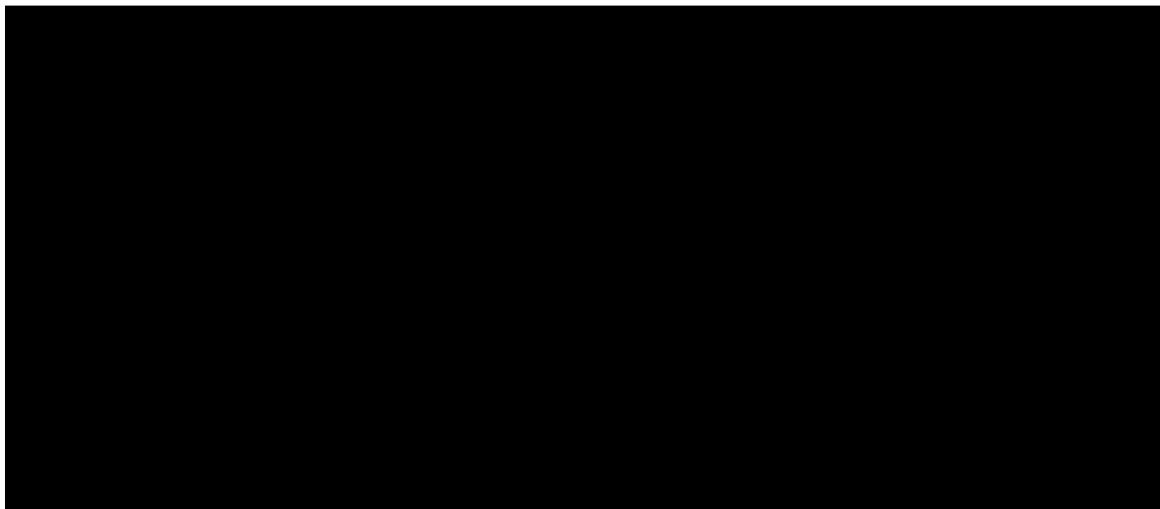
Assistant Attorney General

238 00595-9

BILL OF INDICTMENT

STATE OF GEORGIA, COUNTY OF GWINNETT
IN THE SUPERIOR COURT OF SAID COUNTY

The GRAND JURORS selected, chosen and sworn for the County of Gwinnett to wit:



in the name and behalf of the citizens of Georgia, charge and accuse **UGOCHINYERE ANAZODO**, **DOMINIQUE BEAULIEU**, and **WILLY OBENA** (hereafter referred to collectively as "**THE ACCUSED**"), with the offense of **RACKETEERING**, in violation of **O.C.G.A. § 16-14-4(b)**, for that **THE ACCUSED**, together with one or more unknown participants, in the State of Georgia and the County of Gwinnett, between on or about November 28, 2018, and May 25, 2022, while employed and associated with an enterprise, did conduct and participate in such enterprise, directly and indirectly, through a pattern of racketeering activity, contrary to the laws of said State, the good order, peace, and dignity thereof, as follows:

23R 00595-9

BILL OF INDICTMENT

PART ONE – BACKGROUND

1.

A “romance scam” or “confidence fraud” is a type of online fraud that occurs when individual users of internet dating websites and apps or social media platforms are targeted for fraud by imposters posing as potential paramours. The scammers create fictitious online identifies, often including pictures and fictitious personas. The scammers use these fictitious personas to cultivate relationships with the targeted users through online messaging, emails, text messaging, or voice calls, in order to gain their affection and trust and, ultimately, trick them into sending money or other things of value to the scammers or others participating in the fraud scheme.

2.

In one common scheme, the scammers, posing as the fictitious paramours, provide the targeted victim with an elaborate false story about working overseas and needing money in order to travel back to the United States. In other instances, the scammers claim they need funds to complete business deals abroad or for emergency medical expenses. In certain cases, the scammers refer the targeted victim to other confederates posing as associates of the fictitious paramours, who then corroborate the elaborate stories.

3.

The victims of these “romance” or “confidence” fraud schemes are often directed to wire funds or deposit checks into multiple accounts, often U.S. bank accounts in business names. Those receiving bank accounts are primarily business accounts in order to lend legitimacy to the fraud scheme and also to allow for greater volumes of wire activity in the account without arousing suspicion from the bank. The receiving bank accounts are usually controlled by “money mules” whose role in the fraud scheme is to receive the stolen funds, keep a portion for themselves, and wire most of it on to others in the scheme, often overseas. The money mules are typically not the scammers in contact with the victims.

4.

Business Email Compromise (“BEC”) is a type of cyber-enabled fraud that occurs when an employee of a company is

3

23B 00595-9

BILL OF INDICTMENT

tricked into interacting with an email message that appears to be, but it not, legitimate. One form of BEC occurs when the scammer uses a domain or email address that closely resembles the legitimate domain or address.

5.

In one common BEC scheme, an intruder monitors email traffic on the victim network to determine when a large financial transaction is scheduled to take place. After the initial transfer or wire instructions are established between the legitimate parties to the transaction, the scammer sends a fraudulent follow-up email that appears to be coming from a legitimate party to the transaction. This "spoofed" email contains a change to the transaction, often instructing that the money be wired to a different bank account than originally agreed – one that is controlled by the fraudsters or a conspirator, and that has been set up for the purpose of receiving and directing funds acquired illegally from the BEC scheme.

6.

The proceeds from the BEC scams are often directed to U.S. business bank accounts that have been set up for the purpose of receiving fraud proceeds, just as in the "romance" or "confidence" schemes. The "money mule" who set up the business bank account and received the fraud proceeds usually keeps approximately ten percent of the transaction amount and wires the remaining funds to other confederates. A large percentage of these funds are wired overseas, primarily to China and Nigeria.

PART TWO – THE ENTERPRISE

At all times relevant to this indictment:

7.

UGOCHINYERE ANAZODO is a resident of Georgia and formed at least nine businesses registered with the Georgia Secretary of State between July, 2018, and December, 2021, including the following:

NAME	DATE REGISTERED WITH SOS	FORMED BY	CORRESPONDING BANK ACCOUNTS
Spring Berry Investment LLC	07/19/2018	ANAZODO	[REDACTED]
Spring Berry Beauty	04/26/2021	ANAZODO	[REDACTED]

23A 00595-9

BILL OF INDICTMENT

Supplies & Clothing, LLC			
Spring Berry Home & Office Decor, LLC	07/12/2021	ANAZODO	
Spring Berry Enterprise LLC	03/08/2021	ANAZODO	
Spring Berry Grading & Equipment Sales and Leasing INC	05/26/2021	ANAZODO	
Spring Berry Farms & Food Processing Inc	05/26/2021	ANAZODO	
Spring Berry Construction, LLC	08/18/2021	ANAZODO	
Spring Berry Optimized Conversions, LLC	12/15/2021	ANAZODO	
Spring Berry TirePlus & Auto Accessories LLC	05/14/2021	ANAZODO	
Zipporah & Ugo General Trading and Auto LLC	09/10/2018	ANAZODO	

8.

These businesses, together referred to as "THE ENTERPRISE," provided THE ACCUSED, along with other unindicted participants in the criminal scheme, the appearance of legitimacy.

9.

Despite the appearance of legitimacy, the purpose of THE ENTERPRISE was to launder the proceeds of cyber-enabled fraud from victims of scams including romance scams and business email compromise scams.

10.

For example, after forming Spring Berry Home & Office Decor, **UGOCHINYERE ANAZODO** made it appear he was operating a legitimate business in that name by setting up a corporate bank account and what appeared to be a Spring Berry Home Decor furniture store in a building in Atlanta; however, employees of the furniture store were paid in cash, records of transactions associated with the sale of furniture were not contained in the store, and no furniture appeared to have been sold.

238 00595-9

BILL OF INDICTMENT

11.

Hundreds of thousands of dollars have been transferred to and from the Spring Berry Home Office and Decor bank account since it was established in 2021. The source of those funds includes transfers from money mule accounts, including a mule account used to launder fraud proceeds from [REDACTED] a romance scam victim.

12.

[REDACTED] who met and believed herself to be in a romantic relationship with a person she met online, transferred over \$300,000.00 to various bank accounts at the direction of and, she believed, for the benefit of her supposed paramour. Three of those four bank accounts had been opened using stolen identities and, after receiving [REDACTED] funds, the persons controlling those accounts made transfers to THE ENTERPRISE. This fraud is described in more detail in Part Three, Section b of the indictment, but the chart below shows the flow of funds from [REDACTED] to money mule accounts and then to THE ENTERPRISE:

1. Roatt Enterprises, Inc. [REDACTED] money mule account

DATE OF TRANSACTION	DEPOSIT FROM [REDACTED] TO MONEY MULE ACCOUNT	TRANSFER FROM MULE ACCOUNT TO AN ENTERPRISE BUSINESS
12/21/2021	\$20,000	
12/30/2021		\$31,450.70
01/07/2022		\$7,095
01/12/2022	\$35,000	
01/13/2022		\$37,580
01/15/2022		\$2,322
01/20/2022		\$7,622
01/26/2022		\$51,170.20
01/26/2022		\$58,210.08
02/02/2022	\$30,000	
02/03/2022		\$29,400
02/09/2022	\$16,000	
02/14/2022	\$30,000	

2. Jalal Corporation [REDACTED] money mule account

DATE OF TRANSACTION	DEPOSIT FROM [REDACTED] TO MONEY MULE ACCOUNT	TRANSFER FROM MULE ACCOUNT TO AN ENTERPRISE BUSINESS
---------------------	---	--

238 00595-9

BILL OF INDICTMENT

02/22/2022	\$15,000	
02/23/2022		\$6,478.83
02/23/2022		\$8,471.15
02/24/2023		\$12,455.07

3. Thad Group Corp [REDACTED] money mule account

DATE OF TRANSACTION	DEPOSIT FROM [REDACTED] TO MONEY MULE ACCOUNT	TRANSFER FROM MULE ACCOUNT TO AN ENTERPRISE BUSINESS
03/09/2022	\$14,000	
03/10/2022		\$14,082

4. BushX Logistics, Inc. [REDACTED] money mule account

DATE OF TRANSACTION	DEPOSIT FROM [REDACTED] TO MONEY MULE ACCOUNT	TRANSFER FROM MULE ACCOUNT TO AN ENTERPRISE BUSINESS
05/02/2022	\$25,000	
05/03/2022	\$25,000	
05/03/2022		\$15,140.07
05/03/2022		\$9,750.14
05/04/2022	\$73,000	
05/04/2022		\$19,074.05
05/04/2022		\$5,820
05/05/2022		\$24,610.03
05/05/2022		\$33,071.14
05/05/2022		\$15,118
05/09/2022	\$23,000	
05/10/2022		\$22,910
05/11/2022		\$4,750.10
05/16/2022	\$19,000	
05/16/2022		\$9,407
05/17/2022		\$18,924
05/24/2022	\$6,800	
05/25/2022		\$6,755.02

13.

In addition to being used to receive and launder fraud proceeds from romance scams, THE ENTERPRISE received and laundered fraud proceeds from business email compromise. THE ACCUSED, along with unknown participants, engaged in a scheme to misdirect funds from the Georgia Department of Transportation ("GDOT") intended for a

238 00595-9

BILL OF INDICTMENT

legitimate vendor through fraudulent emails purporting to be from that legitimate vendor. GDOT fell victim to this fraud scheme and misdirected over \$1,000,000 in payment to the fraud account instead of the legitimate vendor.

14.

THE ACCUSED accepted the stolen GDOT funds and disbursed the proceeds amongst themselves and others through wire transfers, checks, and cash withdrawals.

15.

THE ACCUSED were associated with THE ENTERPRISE for the purpose of conducting and participating in, directly and indirectly, THE ENTERPRISE through a pattern of racketeering activity in the following ways:

- a. **UGOCHINYERE ANAZONDO** formed the businesses with the Georgia Secretary of State, opened the business bank accounts, and in both instances made misrepresentations about the purpose of the businesses. Further, **UGOCHINYERE ANAZODO** received into these business bank accounts the proceeds of fraud, knowing that they were not for legitimate business purposes, and transferred some of those fraud proceeds overseas. **UGOCHINYERE ANAZODO** maintained a store front and generally kept up the appearance of a legitimate business man, all of which benefited the true aim of THE ENTERPRISE which was to receive and launder fraud proceeds.
- b. **WILLY OBENA** was associated with THE ENTERPRISE as a money mule and launderer of fraud proceeds. **WILLY OBENA** used his established business bank account to participate in THE ENTERPRISE by repeatedly receiving large wire transfers from the Georgia Department of Transportation, the victim of a BEC and an entity with which **WILLY OBENA** had no legitimate business dealings. Once received, **WILLY OBENA** transferred some of those funds between his personal and business accounts as well as an account he controlled for his minor child. **WILLY OBENA** also transferred funds to THE ENTERPRISE through checks to **DOMINIQUE BEAULIEU** and a check made payable to Spring Berry Investments and deposited by **DOMINIQUE BEAULIEU** into that account.
- c. **DOMINIQUE BEAULIEU** was associated with THE ENTERPRISE as a money mule and launderer

23B 00595-9

BILL OF INDICTMENT

of fraud proceeds. **DOMINIQUE BEAULIEU** received fraud proceeds from the theft of Georgia Department of Transportation funds and deposited them into accounts of **THE ENTERPRISE**.

PART THREE – THE SCHEMES(A) GDOT SchemeBackground of GDOT Scheme

The Georgia Department of Transportation (hereafter “GDOT”) is a department of government of the State of Georgia.

16.

Pro Cutters Lawscapes, Inc. (hereafter “Pro Cutters”) is a Georgia domestic corporation.

17.

At all times relevant to this indictment, Pro Cutters had a contract with GDOT to provide services for GDOT.

18.

At all times relevant to this indictment, Pro Cutters maintained a bank account for receiving payments from GDOT under the terms of their contract.

19.

At all times relevant to this indictment, **WILLY OBENA** controlled and was the sole authorized signer for a Regions Bank checking account ending in [REDACTED] and held in the name of Quality Transportation and Multi Service (hereafter “**OBENA’s** checking account”) and a Regions Bank savings account ending in [REDACTED] and held in the name of Quality Transportation and Multi Service (hereafter “**OBENA’s** savings account”). Beginning on or about January 17, 2019, and continuing thereafter for all times relevant to this indictment, **WILLY OBENA** opened, controlled, and was an authorized signer for a Regions Bank savings for minors account ending in [REDACTED] and held in the name of [REDACTED] and **WILLY OBENA**, custodian (hereafter “**OBENA’s** savings for minors account”).

20.

At all times relevant to this indictment, **DOMINIQUE BEAULIEU** controlled and was the sole authorized signer for

23B 00595-9

BILL OF INDICTMENT

a Regions Bank account ending in [REDACTED] and held in his name (hereafter "BEAULIEU's bank account").

21.

At all times relevant to this indictment, **UGOCHINYERE ANAZODO** controlled and was an authorized signer for a Regions Bank account ending in [REDACTED] and held in the name of Spring Berry Investment LLC (hereafter "ANAZODO's Regions Bank account").

Manner of Conducting the GDOT Scheme

22.

THE ACCUSED engaged in a scheme to fraudulently take money from GDOT and then distribute these stolen proceeds to themselves and others.

23.

In furtherance of the scheme, an unknown participant to the fraud scheme of **THE ACCUSED**, posing as a legitimate representative of Pro Cutters, sent an email to GDOT in December 2018 directing GDOT to change banking account information for Pro Cutters.

24.

In furtherance of the scheme, the unknown participant to the fraud scheme used this email and other communications to deceive GDOT into making payments intended for Pro Cutters to instead be made to **OBENA's** checking account.

25.

Between on or about December 28, 2018, and February 25, 2019, GDOT made 14 payments totaling \$1,033,072 to **OBENA's** checking account before Pro Cutters contacted GDOT and the error was discovered.

26.

In furtherance of the scheme, **WILLY OBENA** and **DOMINIQUE BEAULIEU** withdrew or transferred stolen GDOT funds from **OBENA's** checking account to themselves and others, including **UGOCHINYERE ANAZODO**.

238 00595-9

BILL OF INDICTMENT

27.

In furtherance of the scheme, **UGOCHINYERE ANAZODO** withdrew or transferred stolen GDOT funds he had received from **WILLY OBENA** and **DOMINIQUE BEAULIEU** to himself and others.

28.

UGOCHINYERE ANAZODO, along with one of more other unknown participants, engaged in a scheme to fraudulently take money from [REDACTED] and then distribute these stolen proceeds to themselves and others.

29.

Beginning about October of 2021, an unknown participant to the fraud scheme, posing as a person named Daniel Mullar Omar ("Omar"), began an online correspondence through a dating app with [REDACTED], which ultimately led to discussions and plans for them to get married.

30.

In furtherance of the scheme, "Omar" deceived [REDACTED] into believing that he was a pilot stationed overseas who needed to take leave from his employment in order to visit [REDACTED]

31.

In furtherance of the scheme, "Omar" deceived [REDACTED] into believing that taking leave from his employment to visit her required payments for various reasons such as \$55,000 for a release from his contract and \$46,000 for an insurance payment.

32.

In furtherance of the scheme, "Omar" convinced [REDACTED] that the money would be repaid once he arrived in the United States.

33.

In furtherance of the scheme, "Omar" convinced [REDACTED] to make payments to various bank accounts owned or controlled by one or more other unknown participants in the fraud scheme, previously described as "money mules."

238 00595-9

BILL OF INDICTMENT

34.

Between on or about December 21, 2021, and May 24, 2022, [REDACTED] acting at the direction of "Omar," made 13 payments in the form of wire transfers totaling \$331,800 to bank accounts owned or controlled by the unknown money mules, as shown in the following chart:

<u>Date</u>	<u>Wire amount</u>	<u>Bank account name and last four numbers</u>
12/21/2021	\$20,000	Roatt Enterprises, Inc. [REDACTED]
01/12/2022	\$35,000	Roatt Enterprises, Inc. [REDACTED]
02/02/2022	\$30,000	Roatt Enterprises, Inc. [REDACTED]
02/09/2022	\$16,000	Roatt Enterprises, Inc. [REDACTED]
02/14/2022	\$30,000	Roatt Enterprises, Inc. [REDACTED]
02/22/2022	\$15,000	Jalal Corporation [REDACTED]
03/09/2022	\$14,000	Thad Group Corp [REDACTED]
05/02/2022	\$25,000	BushX Logistics, [REDACTED]
05/03/2022	\$25,000	BushX Logistics, [REDACTED]
05/04/2022	\$73,000	BushX Logistics, [REDACTED]
05/09/2022	\$23,000	BushX Logistics, [REDACTED]
05/16/2022	\$19,000	BushX Logistics, [REDACTED]
05/24/2022	\$6,800	BushX Logistics, [REDACTED]

35.

In furtherance of the scheme, the money mules transferred a portion of the fraud proceeds to the following accounts controlled by **UGOCHINYERE ANAZODO**:

Bank account name and last four numbers

- Spring Berry Beauty Supplies and Clothing, LLC [REDACTED]
- Spring Berry Home & Office Decor, LLC [REDACTED]
- Spring Berry Investment, LLC [REDACTED]
- Spring Berry Optimized Conversions, LLC [REDACTED]
- Zipporah & Ugo General Trade and Auto, LLC [REDACTED]
- Zipporah & Ugo General Trading and Auto, LLC [REDACTED]

36.

After receiving the transfers, and in furtherance of the scheme, **UGOCHINYERE ANAZODO** withdrew or transferred these fraud proceeds to himself and others.

238 00595-9

BILL OF INDICTMENT

PART THREE – RACKETEERING ACTIVITY

37.

In furtherance of their scheme, each of **THE ACCUSED** engaged in at least two acts of racketeering activity, at least one of which occurred in Gwinnett County, Georgia.

38.

Said acts of racketeering activity included:

(a) **THEFT** in violation of **FLA. STAT. § 812.014** and constituting racketeering activity pursuant to **O.C.G.A. § 16-14-3(5)(B)**;

(b) **THEFT BY TAKING** in violation of **O.C.G.A. § 16-8-2** and constituting racketeering activity pursuant to **O.C.G.A. § 16-14-3(5)(A)(xii)**; and

(c) **MONEY LAUNDERING** in violation of **18 U.S.C. § 1956** and constituting racketeering activity pursuant to **O.C.G.A. § 16-14-3(5)(C)**.

Acts of Theft- GDOT Scheme

39.

Between on or about December 28, 2018, and February 25, 2019, **WILLY OBENA** engaged in acts of **THEFT**, in violation of **FLA. STAT. § 812.014**, by knowingly obtaining money, the property of GDOT, with intent to deprive said owner of a right to and benefit from said property, each theft being a separate act in furtherance of the scheme of **THE ACCUSED** and of a value exceeding \$750. Said property is further described as money paid into **OBENA's** checking account, [REDACTED] as shown in the following chart:

<u>Act</u>	<u>Date</u>	<u>Amount</u>
1	12/28/18	\$36,851.00
2	01/02/19	\$31,950.00
3	01/07/19	\$274,275.50
4	01/15/19	\$18,500.00
5	01/18/19	\$242,874.00
6	01/24/19	\$39,346.00
7	01/28/19	\$29,455.00
8	02/01/19	\$3,270.00
9	02/04/19	\$26,870.00

23B 00595-9

BILL OF INDICTMENT

10	02/12/19	\$251,775.50
11	02/14/19	\$18,500.00
12	02/19/19	\$3,270.00
13	02/20/19	\$1,635.00
14	02/25/19	\$54,500.00
	TOTAL:	\$1,033,072.00

40.

Between on or about December 29, 2018, and February 19, 2019, **DOMINIQUE BEAULIEU** engaged in acts of **THEFT**, in violation of **FLA. STAT. § 812.014**, by knowingly using money, the property of GDOT, with intent to deprive said owner of a right to and benefit from said property, each theft being a separate act in furtherance of the scheme of **THE ACCUSED** and of a value exceeding \$750. Said property is further described as money transferred in the form of checks payable to **DOMINIQUE BEAULIEU** and drawn on **OBENA's** checking account, [REDACTED] as shown in the following chart:

<u>Act</u>	<u>Date</u>	<u>Amount</u>	<u>Check #</u>
15	12/29/18	\$21,000	[REDACTED]
16	01/01/19	\$18,000	[REDACTED]
17	01/07/19	\$65,000	[REDACTED]
18	01/08/19	\$61,000	[REDACTED]
19	01/16/19	\$16,000	[REDACTED]
20	01/18/19	\$65,000	[REDACTED]
21	01/22/19	\$50,000	[REDACTED]
22	01/24/19	\$35,000	[REDACTED]
23	02/04/19	\$40,500	[REDACTED]
24	02/12/19	\$85,000	[REDACTED]
25	02/19/19	\$10,000	[REDACTED]
	TOTAL:	\$466,500	

41.

Between on or about January 2, 2019, and February 4, 2019, **UGOCHINYERE ANAZODO** engaged in acts of **THEFT BY TAKING**, in violation of **O.C.G.A. § 16-8-2**, by unlawfully taking property of another, to wit: money, the property of the GDOT, with the intention of depriving this owner of this property, and each deposit being a separate act of theft in furtherance of the scheme of **THE ACCUSED**. Said property is further described as money

238 00595-9

BILL OF INDICTMENT

deposited by **DOMINIQUE BEAULIEU** into **ANAZODO's** Regions Bank account, [REDACTED] as shown in the following chart:

<u>Act</u>	<u>Date</u>	<u>Amount</u>
26	01/02/19	\$10,000
27	01/03/19	\$10,200
28	01/08/19	\$10,000
29	01/16/19	\$5,000
30	01/18/19	\$10,000
31	01/22/19	\$40,000
32	01/24/19	\$20,000
33	02/04/19	\$15,000
TOTAL:		\$120,200

42.

On or about February 13, 2019, **UGOCHINYERE ANAZODO** engaged in an act of **THEFT BY TAKING**, in violation of **O.C.G.A. § 16-8-2**, by unlawfully taking property of another, to wit: money, the property of the GDOT, with the intention of depriving this owner of this property, and said theft being an act in furtherance of the scheme of **THE ACCUSED**. Said property is further described as money transferred by check number [REDACTED] dated February 12, 2019, in the amount of \$80,000, payable to Spring Berry Investment LLC, and drawn on **OBENA's** checking account, [REDACTED]

Acts of Money Laundering-GDOT Scheme


43.

Between on or about December 29, 2018, and February 19, 2019, **WILLY OBENA** and **DOMINIQUE BEAULIEU** engaged in acts of **MONEY LAUNDERING**, in violation of **18 U.S.C. § 1956**, in that **WILLY OBENA** and **DOMINIQUE BEAULIEU** did knowingly conduct financial transactions affecting interstate and foreign commerce, by depositing funds in the form of checks drawn on **WILLY OBENA's** checking account, [REDACTED], and listed in the chart below, each deposit being a separate act of racketeering activity, into **DOMINIQUE BEAULIEU's** bank account, [REDACTED], which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that such transactions were designed


238 00595-9

BILL OF INDICTMENT

in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

<u>Act</u>	<u>Date</u>	<u>Amount</u>	<u>Check #</u>	
35	12/29/18	\$21,000		
36	01/01/19	\$18,000		
37	01/07/19	\$65,000		
38	01/08/19	\$61,000		
39	01/16/19	\$16,000		
40	01/18/19	\$65,000		
41	01/22/19	\$50,000		
42	01/24/19	\$35,000		
43	02/04/19	\$40,500		
44	02/12/19	\$85,000		
45	02/19/19	\$10,000		
TOTAL:		\$466,500		

44.

Between on or about January 2, 2019, and February 4, 2019, **DOMINIQUE BEAULIEU** engaged in acts of **MONEY LAUNDERING**, in violation of 18 U.S.C. § 1956, in that **DOMINIQUE BEAULIEU** did knowingly conduct financial transactions affecting interstate and foreign commerce, by depositing funds in the form of cash into **UGOCHINYERE ANAZODO's** Regions Bank account, , and listed in the chart below, each deposit being a separate act of racketeering activity, which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that such transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

<u>Act</u>	<u>Date</u>	<u>Amount</u>
46	01/02/19	\$10,000
47	01/03/19	\$10,200
48	01/08/19	\$10,000
49	01/16/19	\$5,000

238 00595-9

BILL OF INDICTMENT

50	01/18/19	\$10,000
51	01/22/19	\$40,000
52	01/24/19	\$20,000
53	02/04/19	\$15,000
	TOTAL:	\$120,200

45.

On or about February 13, 2019, **WILLY OBENA** and **DOMINIQUE BEAULIEU** engaged in an act of **MONEY LAUNDERING**, in violation of **18 U.S.C. § 1956**, in that **WILLY OBENA** and **DOMINIQUE BEAULIEU** did knowingly conduct a financial transaction affecting interstate and foreign commerce, by depositing funds into **UGOCHINYERE ANAZODO's** Regions Bank account, [REDACTED], in the form of a check number [REDACTED] dated February 12, 2019, in the amount of \$80,000, made payable to Spring Berry Investments LLC, and drawn on **WILLY OBENA's** checking account, [REDACTED], which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that such transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

46.

Between on or about January 2, 2019, and February 26, 2019, **UGOCHINYERE ANAZODO** engaged in acts of **MONEY LAUNDERING**, in violation of **18 U.S.C. § 1956**, in that **UGOCHINYERE ANAZODO** did knowingly conduct financial transactions affecting interstate and foreign commerce, by withdrawing funds from **ANAZODO's** Regions Bank account, [REDACTED] for the benefit of himself and others and listed in the chart below, each withdrawal being a separate act of racketeering activity, which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that such transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

17

238 00595-9

BILL OF INDICTMENT

<u>Act</u>	<u>Date</u>	<u>Amount</u>	<u>Type of withdrawal</u>
55	01/02/19	\$8,500	Starter check payable to Ugochinyere Anazodo
56	01/03/19	\$300	Cash withdrawal
57	01/03/19	\$7,558	Cashier's check payable to American Forwarding & Logistics
58	01/08/19	\$9,823	Cashier's check payable to American Forwarding & Logistics
59	01/11/19	\$1,800	Starter check payable to Abdulazeez Akwuh
60	01/23/19	\$5,008	Cashier's check payable to Stephanie Anazodo
61	01/23/19	\$3,508	Cashier's check payable to Law Office of Kevin L. Jeudy LLC
62	01/25/19	\$7,629	Cashier's check payable to American Forwarding & Logistics
63	01/25/19	\$2,200	Cash withdrawal
64	01/25/19	\$6,000	Transfer to Abdulazeez Akwuh account [REDACTED]
65	01/28/19	\$9,300	Transfer to Abdulazeez Akwuh account [REDACTED]
66	01/28/19	\$2,000	Check [REDACTED] payable to Ugochinyere Anazodo
67	02/04/19	\$600	Cash withdrawal
68	02/05/19	\$4,000	Check [REDACTED] payable to Ugochinyere Anazodo
69	02/05/19	\$2,000	Cash withdrawal
70	02/14/19	\$2,000	Transfer to Ugochinyere Anazodo account [REDACTED]
71	02/14/19	\$3,000	Cash withdrawal
72	02/15/19	\$32,008	Check [REDACTED] payable to Ugochinyere Anazodo
73	02/23/19	\$5,400	Check [REDACTED] payable to Ugochinyere Anazodo
74	02/26/19	\$400	Cash withdrawal
75	02/26/19	\$200	Cash withdrawal
TOTAL:		\$113,234	

47.

Between on or about December 31, 2018, and February 19, 2019, **WILLY OBENA** engaged in acts of **MONEY LAUNDERING**, in violation of 18 U.S.C. § 1956, in that **WILLY OBENA** did knowingly conduct financial transactions affecting interstate and foreign commerce, by wiring funds from **OBENA**'s checking account, [REDACTED] into **OBENA**'s savings account, [REDACTED] and **OBENA**'s savings for minors account, [REDACTED] as listed in the chart below, each wire being a separate act of racketeering activity, which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that such transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

238 00595-9

BILL OF INDICTMENT

<u>Act</u>	<u>Date</u>	<u>Amount</u>	<u>Account</u>
76	12/31/18	\$2,000	OBENA's savings account, [REDACTED]
77	01/07/19	\$9,000	OBENA's savings account, [REDACTED]
78	01/04/19	\$3,000	OBENA's savings account, [REDACTED]
79	01/18/19	\$5,000	OBENA's savings account, [REDACTED]
80	01/18/19	\$180,000	OBENA's savings account, [REDACTED]
81	01/24/19	\$9,000	OBENA's savings for minors account, [REDACTED]
82	01/28/19	\$16,000	OBENA's savings account, [REDACTED]
83	01/28/19	\$5,000	OBENA's savings for minors account, [REDACTED]
84	02/12/19	\$40,000	OBENA's savings for minors account, [REDACTED]
85	02/13/19	\$122,000	OBENA's savings account, [REDACTED]
86	02/19/19	\$20,000	OBENA's savings account, [REDACTED]
Total:		\$411,000	

48.

Between on or about January 30, 2019, and February 8, 2019, **WILLY OBENA** engaged in acts of **MONEY LAUNDERING**, in violation of 18 U.S.C. § 1956, in that **WILLY OBENA** did knowingly conduct financial transactions affecting interstate and foreign commerce, by withdrawing funds from **OBENA's** checking account, [REDACTED] and listed in the chart below, each withdrawal being a separate act of racketeering activity, which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that such transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

<u>Act</u>	<u>Date</u>	<u>Amount</u>	<u>Check # or withdrawal</u>
87	12/28/18	\$6,000	[REDACTED]
88	01/02/19	\$6,000	[REDACTED]
89	01/07/19	\$60	[REDACTED]
90	01/11/19	\$3,000	[REDACTED]
91	01/16/19	\$200	withdrawal
92	01/21/19	\$500	withdrawal
93	01/30/19	\$2,000	[REDACTED]
94	02/01/19	\$2,000	[REDACTED]
95	02/14/19	\$500	withdrawal
96	02/15/19	\$2,000	[REDACTED]
97	02/21/19	\$500	withdrawal

TOTAL: \$22,760

238 00595-9

BILL OF INDICTMENT

Acts of Theft [REDACTED] scheme

49.

Between on or about December 30, 2021, and May 25, 2022, **UGOCHINYERE ANAZODO** engaged in acts of **THEFT BY TAKING**, in violation of **O.C.G.A. § 16-8-2**, by unlawfully taking property of another, to wit: money, the property of [REDACTED] with the intention of depriving this owner of this property, and each theft being a separate act in furtherance of the scheme of **THE ACCUSED**. Said property is further described as money transferred from bank accounts controlled by unknown participants in the form of checks issued to businesses controlled by **UGOCHINYERE ANAZODO**, as shown in the following chart:

<u>Act</u>	<u>Date of check</u>	<u>Amount</u>	<u>From Mule Account</u>	<u>To Anazodo's Business</u>
98	12/30/2021	\$31,450.70	Roatt Enterprises	Zipporah & Ugo General Trade and Auto
99	01/07/2022	\$7,095	Roatt Enterprises	Zipporah & Ugo General Trade and Auto
100	01/13/2022	\$37,580	Roatt Enterprises	Zipporah & Ugo General Trade and Auto
101	01/15/2022	\$2,322	Roatt Enterprises	Zipporah & Ugo General Trade and Auto
102	01/20/2022	\$7,622	Roatt Enterprises	Zipporah & Ugo General Trade and Auto
103	01/26/2022	\$51,170.20	Roatt Enterprises	Zipporah & Ugo General Trade and Auto
104	01/26/2022	\$58,210.08	Roatt Enterprises	Zipporah & Ugo General Trade and Auto
105	02/03/2022	\$29,400	Roatt Enterprises	Zipporah & Ugo General Trade and Auto
106	02/23/2022	\$6,478.83	Jalal Corporation	Spring Berry Investment
107	02/23/2022	\$8,471.15	Jalal Corporation	Spring Berry Investment
108	02/24/2022	\$12,455.07	Jalal Corporation	Spring Berry Beauty Supplies & Clothing
109	03/10/2022	\$14,082	Thad Group Corp	Spring Berry Optimized Conversions
110	05/03/2022	\$15,140.07	BushX Logistics	Spring Berry Investment
111	05/03/2022	\$9,750.14	BushX Logistics	Spring Berry Home & Office Decor
112	05/04/2022	\$19,074.05	BushX Logistics	Spring Berry Investment
113	05/04/2022	\$5,820	BushX Logistics	Zipporah & Ugo General Trading and Auto
114	05/05/2022	\$24,610.03	BushX Logistics	Zipporah & Ugo General Trading and Auto
115	05/05/2022	\$33,071.14	BushX Logistics	Zipporah & Ugo General Trading and Auto
116	05/05/2022	\$15,118	BushX Logistics	Spring Berry Beauty Supplies & Clothing
117	05/10/2022	\$22,910	BushX Logistics	Spring Berry Beauty Supplies & Clothing
118	05/11/2022	\$4,750.10	BushX Logistics	Spring Berry Home & Office Decor
119	05/16/2022	\$9,407	BushX Logistics	Spring Berry Home & Office Decor
120	05/17/2022	\$18,924	BushX Logistics	Spring Berry Investment
121	05/25/2022	\$6,755.02	BushX Logistics	Spring Berry Home & Office Decor
TOTAL:		\$451,666.58		

238 00595-9

BILL OF INDICTMENT

Acts of Money Laundering- [REDACTED] scheme

50.

Between on or about May 4, 2022, and May 6, 2022, **UGOCHINYERE ANAZODO** engaged in acts of **MONEY LAUNDERING**, in violation of **18 U.S.C. § 1956**, in that **UGOCHINYERE ANAZODO** did knowingly conduct financial transactions affecting interstate and foreign commerce, by withdrawing funds from the account of Zipporah & Ugo General Trading and Auto, [REDACTED], an account controlled by **UGOCHINYERE ANAZODO**, for the benefit of himself and others and listed in the chart below, each withdrawal being a separate act of racketeering activity, which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that such transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

<u>Act</u>	<u>Date</u>	<u>Amount</u>
146	05/04/2022	\$3,222.02
147	05/06/2022	\$8,000.000
148	05/06/2022	\$20,000.00
149	05/06/2022	\$30,000.00
150	05/06/2022	\$3,000.00
151	05/06/2022	\$500.00

PART FOUR - THE PROPERTY

51.

Through their pattern of racketeering activity, **THE ACCUSED** acquired and maintained money in the amount of approximately \$1,364,872.00.

Count Two

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, further charge and accuse **UGOCHINYERE ANAZODO, DOMINIQUE BEAULIEU, and WILLY OBENA** (hereafter referred to collectively as "**THE ACCUSED**"), with the offense of **RACKETEERING**, in violation of **O.C.G.A. § 16-14-4(a)**

238 00595-9

BILL OF INDICTMENT

for that **THE ACCUSED**, together with one or more unknown participants, in the State of Georgia and the County of Gwinnett, between on or about November 28, 2018, and May 25, 2022, did acquire and maintain, directly and indirectly, an interest in and control of personal property, through a pattern of racketeering activity as described above in Count 1, paragraphs 1-51, and incorporated herein by reference, contrary to the laws of said State, the good order, peace, and dignity thereof.

Count Three

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, further charge and accuse **UGOCHINYERE ANAZODO** with the offense of **THEFT BY TAKING**, in violation of **O.C.G.A. § 16-8-2**, for that the accused, in the State of Georgia and the County of Gwinnett, on or about February 13, 2019, unlawfully did take property of another, to wit: money, the property of the Georgia Department of Transportation, and of a value exceeding \$24,999.99, with the intention of depriving this owner of this property, contrary to the laws of said State, the good order, peace, and dignity thereof. Said property is further described as that money transferred by check number [REDACTED], dated February 12, 2019, in the amount of \$80,000, payable to Spring Berry Investment LLC, and drawn on the account of Quality Transportation and Multi Service, [REDACTED].

The crime alleged does not fall outside of the limitations on prosecution because, pursuant to O.C.G.A. § 17-3-2(2), the crime was unknown until at least February 25, 2019.

Count Four

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, further charge and accuse **UGOCHINYERE ANAZODO** with the offense of **MONEY LAUNDERING**, in violation of **O.C.G.A. § 7-1-915**, for that the accused, in the State of Georgia and the County of Gwinnett, on or about February 15, 2019, did conduct a currency transaction, to wit: the withdrawal of money in the form of a check issued by said accused in the amount of \$32,008 from the bank account of Spring Berry Investment LLC, Regions Bank [REDACTED], knowing that the moneys involved in said currency transaction represented the proceeds of some form of unlawful activity and which did in fact

238 00595-9

BILL OF INDICTMENT

involve the proceeds of specified unlawful activity, to wit: theft by taking in violation of O.C.G.A. § 16-8-2, knowing that said currency transaction was designed in whole and in part to conceal and disguise the nature, source and ownership of the proceeds,

contrary to the laws of said State, the good order, peace, and dignity thereof.

The crime alleged does not fall outside of the limitations on prosecution because, pursuant to O.C.G.A § 17-3-2(2), the crime was unknown until at least February 25, 2019.

**CHRISTOPHER M. CARR
ATTORNEY GENERAL**