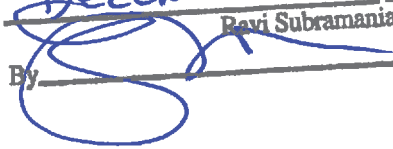


Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

December 6 2023  
Ravi Subramanian, Clerk  
By  Deputy

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UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,  
  
v.  
FRANKLIN IKECHUKWU NWADIALO,  
Defendant.

NO. CR23-5356 TMC  
INDICTMENT

The Grand Jury charges that:

COUNTS 1-14  
(Wire Fraud)

**A. Scheme and Artifice to Defraud**

1. Beginning at a time unknown but not later than December 2019 and continuing through December 6, 2023, in Kitsap County, within the Western District of Washington, and elsewhere, the defendant, FRANKLIN IKECHUKWU NWADIALO, along with others known and unknown (collectively, the “co-schemers”) devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as further and more particularly described below.

1 2. The essence of the scheme and artifice to defraud was for the co-schemers  
2 to unjustly enrich themselves by committing a series of fraud against individuals located  
3 across the United States, including in the Western District of Washington, by perpetrating  
4 romance scams among other fraud schemes.

5 3. Many of the co-schemers' romance scam victims were older, often  
6 widowed or divorced, individuals. The co-schemers conducted the romance scams by  
7 sending victims messages through online dating services and other electronic means of  
8 communications that deceived the victims into believing they were in a romantic  
9 relationship with persons who were, in fact, fake identities assumed by the co-schemers.  
10 Once the co-schemers used the fake identities to fraudulently gain the trust of the victims,  
11 they convinced the victims, under false pretenses, to transfer fiat and virtual currency into  
12 accounts the victims believed were controlled by their romantic interests, when in fact the  
13 accounts were controlled by the co-schemers, including NWADIALO.

14 4. At times, the co-schemers also persuaded the victims, under false pretenses,  
15 to receive funds into the victims' accounts, which unbeknownst to the victims were  
16 proceeds of frauds upon other victims, and to transfer those funds to accounts under the  
17 control of the co-schemers.

18 5. During all times relevant to this Indictment, NWADIALO resided outside  
19 the United States. The victims resided within the Western District of Washington and  
20 elsewhere in the United States.

21 **B. Manner and Means**

22 6. It was a part of the scheme and artifice to defraud that the co-schemers  
23 targeted older, often widowed or divorced, individuals with savings as romantic interests  
24 on dating websites, such as Zoosk, Christian Cafe, and Match.

25 7. It was further part of the scheme and artifice to defraud that the co-  
26 schemers created false and fraudulent identities and backgrounds on dating websites to  
27

1 appear to be individuals living in the United States to gain the romance victims’  
2 confidence and trust.

3 8. It was further part of the scheme and artifice to defraud that the co-  
4 schemers frequently communicated with their romance scam victims through dating  
5 websites, email, WhatsApp, and other means of communications, but never met their  
6 victims in person.

7 9. It was further part of the scheme and artifice to defraud that, after gaining  
8 the romance scam victims’ trust and confidence, the co-schemers falsely and fraudulently  
9 claimed that they needed monetary assistance from the romance scam victims. The co-  
10 schemers then directed the romance scam victims to send money to specific accounts  
11 under false and fraudulent pretenses.

12 10. It was further part of the scheme and artifice to defraud that the co-  
13 schemers falsely and fraudulently induced the romance scam victims to move fraudulent  
14 funds into offshore accounts controlled by the co-schemers.

15 11. It was further part of the scheme and artifice to defraud that the co-  
16 schemers depleted the victims of all funds that the victims were able and willing to send,  
17 which sometimes were the victims’ entire savings.

18 12. It was further part of the scheme and artifice to defraud that the co-  
19 schemers caused victims to lose at least \$3.3 million.

20 13. It was further part of the scheme and artifice to defraud that the co-  
21 schemers engaged in the following conduct:

22 **a. Victim J.C.**

23 i. Around November 2020, the co-schemers began communicating  
24 with J.C. on Zoosk, an online dating service, by falsely posing as a man named “Antonio  
25 Giovanni.” “Giovanni” claimed to be an officer in the U.S. military and used his  
26  
27

1 purported profession as an excuse for being unable to meet J.C. in person. Instead, J.C.  
2 and “Giovanni” communicated over WhatsApp.

3 ii. After duping J.C. into believing that she was in a romantic  
4 relationship, “Giovanni” induced J.C. to send him funds using false and fraudulent  
5 statements. As one example, “Giovanni” falsely claimed to have been fined \$150,000 for  
6 violating the military’s code of conduct by disclosing his location to J.C. and asked J.C.  
7 to help pay this fine.

8 iii. To assist “Giovanni,” J.C. liquidated her deceased husband’s  
9 retirement account, used her home as collateral for a loan, and ultimately sold her home.  
10 The co-schemers caused J.C. to transfer at least \$2.4 million into accounts controlled by  
11 the co-schemers, including NWADIALO.

12 iv. After depleting J.C. of her savings, the co-schemers falsely  
13 messaged J.C. that “Giovanni” had died while on a foreign mission.

14 **b. Victim N.F.**

15 i. Around December 2019, the co-schemers falsely posed as a man  
16 named “Tony Giovanni” and contacted N.F. on Match, an online dating service. As with  
17 J.C., “Giovanni” falsely told N.F. that he was a soldier for the U.S. military and used his  
18 military background as an excuse for being unable to meet in person. N.F. communicated  
19 with “Giovanni” using WhatsApp and other electronic means, but never met him in  
20 person.

21 ii. After fraudulently gaining N.F.’s trust, “Giovanni” began asking for  
22 financial assistance using false and fraudulent excuses. For example, “Giovanni” asked  
23 N.F. for help paying for taxes, funeral costs, and other expenses arising from his father’s  
24 purported death.

25 iii. “Giovanni” also asked N.F. to send and receive funds purportedly on  
26 his behalf by claiming that he was having issues accessing his financial accounts.

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1 Through these false statements, “Giovanni” induced N.F. to help move illicit gains for the  
2 co-schemers.

3           iv.     The co-schemers fraudulently caused N.F. to transfer at least  
4 \$330,000 into accounts controlled by the co-schemers, including NWADIALO.

5           **c.     Victim A.M.**

6           i.     The co-schemers, fraudulently posing as a man named “David  
7 Giovanni,” initially communicated with A.M. through Christian Cafe, an online dating  
8 service. “Giovanni” falsely claimed to work in information technology and to have a  
9 contract with the U.S. military, which purportedly prevented “Giovanni” from meeting  
10 A.M. in person and from communicating with her using video chats. To gain A.M.’s  
11 trust, “Giovanni” sent her a fake video and pictures that he claimed were of himself.

12           ii.    After gaining A.M.’s trust, “Giovanni” fraudulently induced her to  
13 send funds to various accounts that he provided to her by falsely claiming that he was  
14 making investments for her. As part of this fraud scheme, “Giovanni” falsely told A.M.  
15 that a check she received from another individual were proceeds from her  
16 cryptocurrency investment and directed her to reinvest the funds into a specific virtual  
17 currency address that he provided to her.

18           iii.   The co-schemers fraudulently induced A.M. to transfer at least  
19 \$270,000 into accounts controlled by the co-schemers, including NWADIALO.

20           **d.     Victim R.G.**

21           i.     In or around August 2020, the co-schemers posed as a man named  
22 “Antoni Giovanni” and began communicating with R.G. on Zoosk. “Giovanni” claimed  
23 to work for the U.S. Army, which purportedly limited his ability to communicate with  
24 R.G. “Giovanni” and R.G. never met in person.

25           ii.    After gaining R.G.’s trust, “Giovanni” asked for financial assistance  
26 using false and fraudulent statements. As one example, “Giovanni” falsely claimed to  
27

1 need financial assistance to pay for his father's purported funeral expenses. In a different  
2 instance, "Giovanni" asked R.G. to help pay for his alleged son's school expenses.

3           iii. Through their conduct, the co-schemers fraudulently caused R.G. to  
4 transfer at least \$310,000 into accounts controlled by the co-schemers, including  
5 NWADIALO.

6 **C. Execution of the Scheme and Artifice to Defraud**

7           14. On or about each of the below dates, in Kitsap County, within the Western  
8 District of Washington, and elsewhere, having devised the above-described scheme and  
9 artifice to defraud, the defendant, FRANKLIN IKECHUKWU NWADIALO, for the  
10 purpose of executing the scheme and artifice described above caused to be transmitted by  
11 means of wire communication in interstate commerce the signals and sounds described  
12 below for each count:

Count	Approximate Date	Interstate Wire
1	July 4, 2020	Email message sent from Victim N.F. in the Western District of Washington to "Giovanni" located outside Washington State forwarding JPMorgan Chase statements.
2	July 25, 2020	Email message received by Victim N.F. in the Western District of Washington from "Giovanni" located outside Washington State forwarding incorporation documents for a purported nonprofit.
3	July 26, 2020	Email message received by Victim N.F. in the Western District of Washington from "Giovanni" located outside Washington State regarding "Giovanni's" purported military occupation.
4	March 3, 2021	WhatsApp message received by Victim J.C. in the Western District of Washington from "Giovanni" located outside Washington State with information about a virtual currency wallet ending in 6zyg.
5	March 3, 2021	WhatsApp message received by Victim J.C. in the Western District of Washington from "Giovanni"

1		located outside Washington State with information about a virtual currency wallet ending in V3JJ.
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3	6	April 16, 2021
4		Electronic instructions sent from the Western District of Washington across state lines to a server located outside Washington State, causing a transfer in the amount of 0.12 bitcoin from Victim N.F.'s virtual currency wallet to NWADIALO's virtual currency wallet.
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6		
7	7	June 3, 2021
8		Electronic instructions sent from the Western District of Washington across state lines to a server located outside Washington State to authorize a wire transfer of \$724,321.80 from Victim J.C.'s Kitsap Credit Union account.
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10		
11	8	June 3, 2021
12		WhatsApp message sent from Victim J.C. in the Western District of Washington to "Giovanni" located outside Washington State regarding J.C.'s wire transfer on that same day from Kitsap Credit Union.
13		
14	9	July 1, 2021
15		Electronic instructions sent from the Western District of Washington across state lines to a server located outside Washington State, causing a transfer in the amount of 4.10 bitcoin from Victim J.C.'s virtual currency wallet to NWADIALO's virtual currency wallet.
16		
17		
18	10	October 7, 2021
19		WhatsApp message sent from Victim J.C. in the Western District of Washington to "Giovanni" located outside Washington State about efforts to obtain funds to help "Giovanni."
20		
21	11	August 5, 2022
22		Email message sent from Victim A.M. in the Western District of Washington to "Giovanni" located outside Washington State forwarding Coinbase transaction confirmation.
23		
24	12	August 29, 2022
25		Electronic instructions sent from the Western District of Washington across state lines to a server located outside Washington State, authorizing a wire transfer of \$25,000 from Victim A.M.'s Wells Fargo account.
26		
27		

1 2 3 4	13 November 30, 2022	Electronic instructions sent from the Western District of Washington across state lines to a server located outside Washington State, authorizing a wire transfer of \$25,000 from Victim A.M.'s JPMorgan Chase Bank account.
5 6 7 8	14 December 3, 2022	Electronic instructions sent from the Western District of Washington across state lines to a server located outside Washington State, causing a transfer in the amount of 18.91 ether from Victim A.M.'s virtual currency wallet to NWADIALO's virtual currency wallet.

9 All in violation of Title 18, United States Code, Sections 1343 and 2.

10 **FORFEITURE ALLEGATION**

11 The allegations contained in Counts 1-14 of this Indictment are hereby realleged  
12 and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of  
13 any of the offenses alleged in Counts 1-14, the defendant, FRANKLIN IKECHUKWU  
14 NWADIALO, shall forfeit to the United States any property constituting, or derived  
15 from, proceeds NWADIALO obtained directly or indirectly, as a result of the offense. All  
16 such property is forfeitable pursuant to Title 18, United States Code, Section  
17 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), and includes but  
18 is not limited to a sum of money reflecting the proceeds NWADIALO obtained from the  
19 offense.



1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
- 4 b. has been transferred or sold to, or deposited with, a third party;
- 5 c. has been placed beyond the jurisdiction of the Court;
- 6 d. has been substantially diminished in value; or,
- 7 e. has been commingled with other property which cannot be divided  
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

12  
13 A TRUE BILL:

14 DATED: 12/6/23

15 *Signature of Foreperson redacted pursuant*  
16 *to the policy of the Judicial Conference of*  
17 *the United States.*

18 \_\_\_\_\_  
19 FOREPERSON

18   
19 \_\_\_\_\_  
20 TESSA M. GORMAN  
21 Acting United States Attorney

21   
22 \_\_\_\_\_  
23 ANDREW C. FRIEDMAN  
24 Assistant United States Attorney

24   
25 \_\_\_\_\_  
26 SOK TEA JIANG  
27 Assistant United States Attorney