

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

No. 5:22-CR-348-1D-KS
No. 5:22-CR-348-2D-KS
No. 5:22-CR-348-3D-KS

UNITED STATES OF AMERICA)
)
 v.)
)
MAMADY FADIMA CONDE,)
JOSEPH KINGSLEY IRONA, and)
CHINEDU FRANCES OKWUOSHA)
_____)

INDICTMENT

The Grand Jury charges that:

General Allegations

At all times relevant to the Indictment:

1. Defendant MAMADY FADIMA CONDE was an individual residing in Raleigh, North Carolina.
2. Defendant JOSEPH KINGSLEY IRONA was an individual residing in Raleigh, North Carolina.
3. Defendant CHINEDU FRANCES OKWUOSHA was an individual residing in Raleigh, North Carolina.
4. The Social Security Administration (SSA) was an agency of the United States authorized to distribute monetary benefits to qualified recipients, including retirement benefits under Title II of the Social Security Act. The SSA retirement program provided cash benefits to eligible wage earners who had reached the age of 62 and had contributed to Social Security through their taxable earnings. Eligible

recipients could file a claim for retirement benefits through SSA's online portal by submitting an application that contains their personal identifying information. Eligible recipients could receive retirement benefits payments by check or by electronic transfer of funds to a designated bank account.

5. The Small Business Administration (SBA) was an agency of the United States that provided support to entrepreneurs and small businesses. The Economic Injury Disaster Loan (EIDL) program was an SBA program that provided low-interest financing to small businesses. Following the passage of the Coronavirus Aid, Relief, and Economic Security (CARES) Act in March 2020, the SBA was authorized to extend EIDL loans to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic. In order to obtain EIDL funds, an applicant completed an online application in which they were required to provide their personal identifying information and information about their business's operations.

6. A "romance scam" is a type of Internet-enabled fraud scheme that occurs when a fraudster adopts a fake online identity to gain a victim's affection and trust. The fraudster then uses the illusion of a romantic relationship to manipulate and exploit the victim for financial gain.

7. A "drop account" refers to a bank account used, in whole or in part, to receive, move, process, convert, dispose of, and obscure criminal proceeds.

COUNT ONE

8. Paragraphs 1 through 7 are re-alleged and incorporated herein as though fully set forth in this count.

9. Beginning from a date unknown, but no later than in or about August 2018, and continuing until at least in or about July 2021, both dates being approximate and inclusive, in the Eastern District of North Carolina and elsewhere, the defendants, MAMADY FADIMA CONDE, JOSEPH KINGSLEY IRONA, and CHINEDU FRANCES OKWUOSHA, did knowingly and intentionally combine, conspire, confederate, and agree with one or more persons, known and unknown, to commit an offense against the United States, that is, to knowingly conduct and attempt to conduct a financial transaction, affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity—namely, wire fraud, in violation of 18 U.S.C. § 1343—knowing that the transaction was designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such transaction knew that the property involved represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Manner and Means of the Conspiracy

The manner and means used to accomplish the purpose and objectives of the conspiracy included, but were not limited to, the following:

10. It was part of the conspiracy that MAMADY FADIMA CONDE, JOSEPH KINGSLEY IRONA, and CHINEDU FRANCES OKWUOSHA opened, maintained, and controlled drop accounts at one or more financial institutions.

11. It was further part of the conspiracy that MAMADY FADIMA CONDE, JOSEPH KINGSLEY IRONA, and CHINEDU FRANCES OKWUOSHA used these accounts to unlawfully collect and transact proceeds originating from wire fraud, as described below.

Scheme to Defraud California Victim

12. It was part of the conspiracy that S.T., a victim in Huntington Beach, California, was targeted and defrauded by a romance scam.

13. It was further part of the conspiracy that a co-conspirator directed S.T. to wire funds to a bank account maintained and controlled by JOSEPH KINGSLEY IRONA.

Scheme to Defraud SSA – Title II Retirement Benefits

14. It was part of the conspiracy that one or more co-conspirators accessed SSA's online web portal and used the stolen personal identifying information of eligible recipients, including Social Security numbers and dates of birth, to file false and fraudulent claims for Title II retirement benefits.

15. It was further part of the conspiracy that one or more co-conspirators directed the stolen retirement funds to be deposited into various drop accounts maintained and controlled by MAMADY FADIMA CONDE, JOSEPH KINGSLEY IRONA, and CHINEDU FRANCES OKWUOSHA.

Scheme to Defraud SBA – EIDL Program

16. It was part of the conspiracy that one or more co-conspirators fraudulently applied for and obtained EIDL loans through electronic means using stolen identities and other false borrower information with the intent to steal the loan proceeds.

17. It was further part of the conspiracy that one or more co-conspirators directed the stolen EIDL funds to be deposited into drop accounts maintained and controlled by MAMADY FADIMA CONDE.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS TWO THROUGH SIX

18. Paragraphs 1 through 17 are re-alleged and incorporated herein as though fully set forth in this count.

19. On or about the dates set forth below, in the Eastern District of North Carolina and elsewhere, the defendant identified below did knowingly engage and attempt to engage in a monetary transaction, affecting interstate and foreign commerce, in criminally derived property that was of a value greater than \$10,000, that is, the transaction indicated below, such property having been derived from specified unlawful activity—namely, wire fraud, in violation of 18 U.S.C. § 1343:

COUNT	DEFENDANT	DATE	MONETARY TRANSACTION	SUA PROCEEDS
2	IRONA	08/02/18	\$15,010 withdrawal from IRONA's Bank of America account ending in 5395	Wire Fraud (Romance Scam)
3	IRONA	08/03/18	\$17,220 withdrawal from IRONA's Bank of America account ending in 5395	Wire Fraud (Romance Scam)
4	CONDE	06/29/20	\$35,000 official check obtained with proceeds drawn from CONDE's North State Bank account ending in 8397 and made payable to Joseph IRONA	Wire Fraud (SBA / EIDL)
5	CONDE	06/29/20	\$40,000 wire transfer into CONDE's SECU account ending in 3258	Wire Fraud (SBA / EIDL)
6	CONDE	07/23/20	\$50,000 official check deposited into CONDE's SECU account ending in 3931	Wire Fraud (SBA / EIDL)

Each of the above entries constituting a separate violation of Title 18, United States Code, Section 1957.

COUNTS SEVEN THROUGH SEVENTEEN

20. Paragraphs 1 through 17 are re-alleged and incorporated herein as though fully set forth in this count.

21. On or about the dates set forth below, in the Eastern District of North Carolina and elsewhere, the defendant identified below did knowingly conduct and attempt to conduct a financial transaction, that is, the transaction(s) indicated below, affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity—namely, wire fraud, in violation of 18 U.S.C. § 1343—knowing that the transaction was designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said

specified unlawful activity, and that while conducting and attempting to conduct such transaction knew that the property involved represented the proceeds of some form of unlawful activity:

COUNT	DEFENDANT	DATE	FINANCIAL TRANSACTION	SUA PROCEEDS
7	OKWUOSHA	10/18/19	\$1,577 cashier's check obtained with proceeds drawn from OKWUOSHA's Woodforest Bank account ending in 2204 and made payable to Joseph IRONA	Wire Fraud (SSA/Victim R.S.)
8	IRONA	02/04/20	\$3,500 withdrawal from IRONA's First Citizens Bank account ending in 6804	Wire Fraud (SSA/Victim E.S.)
9	OKWUOSHA	02/18/20	\$2,000 withdrawal from OKWUOSHA's Woodforest Bank account ending in 2204	Wire Fraud (SSA/Victim J.C.)
10	OKWUOSHA	02/25/20	\$1,100 withdrawal from OKWUOSHA's Woodforest Bank account ending in 2204	Wire Fraud (SSA/Victim G.W.)
11	OKWUOSHA	03/13/20	\$4,000 withdrawal from OKWUOSHA's Woodforest Bank account ending in 2204	Wire Fraud (SSA/Victim B.A.)
12	IRONA	08/17/20	\$5,000 withdrawal from IRONA's Fidelity Bank account ending in 2741	Wire Fraud (SSA/Victim S.C.)
13	CONDE	10/08/20	\$5,500 cashier's check obtained with proceeds drawn from CONDE's First Horizon Bank account ending in 1252 and made payable to Joseph IRONA	Wire Fraud (SSA/Victim G.M.)
14	CONDE	11/11/20	\$502 withdrawal from First Horizon Bank account ending in 1189	Wire Fraud (SSA/Victim B.A.)
15	IRONA	12/09/20	\$2,001.84 debit purchase at Food Lion from First National Bank account ending in 0801	Wire Fraud (SSA/Victim P.C.)
16	CONDE	03/03/21	\$4,000 withdrawal from CONDE's North State Bank account ending in 8397	Wire Fraud (SSA/Victim G.W.)
17	CONDE	03/22/21	\$2,000 withdrawal from CONDE's United Bank account ending in 6963	Wire Fraud (SSA/Victim J.C.)

Each of the above entries constituting a separate violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT EIGHTEEN

22. On or about April 7, 2021, in the Eastern District of North Carolina and elsewhere, the defendant, MAMADY FADIMA CONDE, executed and attempted to execute a scheme and artifice to defraud, and to obtain money, funds, credits, and assets owned by and under the custody and control of United Bank, a financial institution as defined in 18 U.S.C. § 20(1), whose deposits were then insured by the Federal Deposit Insurance Corporation, by means of materially false and fraudulent pretenses, representations, and promises.

23. It was part of the scheme and artifice to defraud that on or about January 25, 2021, the defendant, MAMADY FADIMA CONDE, opened a business checking account at United Bank in the name of “Conde Enterprises Mechanic Bodyshop.”

24. It was a part of the scheme and artifice to defraud that on or about April 7, 2021, the defendant, MAMADY FADIMA CONDE, deposited into the above-referenced account a fraudulent check in the amount of \$12,650 that purported to be drawn upon the account of a victim business in Illinois.

All in violation of Title 18, United States Code, Section 1344.

COUNT NINETEEN

25. On or about June 22, 2021, in the Eastern District of North Carolina and elsewhere, the defendant, MAMADY FADIMA CONDE, executed and attempted to execute a scheme and artifice to defraud, and to obtain money, funds, credits, and assets owned by and under the custody and control of North State Bank, a financial institution as defined in 18 U.S.C. § 20(1), whose deposits were then insured by the Federal Deposit Insurance Corporation, by means of materially false and fraudulent pretenses, representations, and promises.

26. It was part of the scheme and artifice to defraud that on or about June 18, 2020, the defendant, MAMADY FADIMA CONDE, opened a business checking account at North State Bank in the name of “Conde Enterprises Mechanic Bodyshop.”

27. It was a part of the scheme and artifice to defraud that on or about June 22, 2021, the defendant, MAMADY FADIMA CONDE, deposited into the above-referenced account a fraudulent check in the amount of \$310,000 that purported to be drawn upon the account of a victim in Pennsylvania.

All in violation of Title 18, United States Code, Sections 1344.

FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any offense charged herein constituting “specified unlawful activity” (as defined in 18 U.S.C. § 1956(c)(7) and 1961(1)), or a conspiracy to commit such offense, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), as made applicable by 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the said offense.

Upon conviction of any violation of 18 U.S.C. §§ 1956 and/or 1957 charged herein, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

Upon conviction of any violation of 18 U.S.C. § 1344 charged herein, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation.

The forfeitable property includes, but is not limited to, the following:


Forfeiture Money Judgment

- a) A sum of money representing the value of the property involved in the money laundering offense(s) charged herein against MAMADY FADIMA CONDE, in the amount of at least \$382,605.

- b) A sum of money representing the value of the property involved in the money laundering offense(s) charged herein against JOSEPH KINGSLEY IRONA, in the amount of at least \$248,252
- c) A sum of money representing the value of the property involved in the money laundering offense(s) charged herein against CHINEDU FRANCES OKWUOSHA, in the amount of at least \$169,605.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

¹
A TRUE BILL, Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.
REDACTED VERSION
FOREPERSON
Date: 12/20/2022

MICHAEL F. EASLEY, JR.
United States Attorney

ADAM F. HULBIG
Assistant United States Attorney
Criminal Division