



The Honorable J. Richard Creatura

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

<p>UNITED STATES OF AMERICA,</p> <p style="text-align: center;">Plaintiff</p> <p style="text-align: center;">v.</p> <p>CHUKWUEMEKA ONYEBBULA a/k/a Phillip Carter,</p> <p style="text-align: center;">Defendant.</p>	<p>CASE NO. MJ21-5117</p> <p>COMPLAINT for VIOLATIONS</p> <p>Title 18 U.S.C. § 1343</p>
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BEFORE, J. Richard Creatura, Chief United States Magistrate Judge, United States Courthouse, Tacoma, Washington.

The undersigned complainant, being duly sworn, states:

COUNTS 1-5
(Wire Fraud)

A. Background

1. These charges involve CHUKWUEMEKA ONYEBBULA’s use of Americans’ stolen personal identifying information (PII) to submit fraudulent claims for benefits intended for American workers and businesses suffering from the economic effects of the COVID-19 pandemic. As described herein, ONYEBBULA, a Nigerian

1 national who is not entitled to collect unemployment benefits in the United States,
2 submitted at least 253 unemployment claims to the Washington Employment Security
3 Department and other state workforce agencies using the stolen identities of residents of
4 Washington and other states. Similarly, ONYEBGULA used stolen PII to submit
5 fraudulent applications to the United States Small Business Administration (SBA) to
6 benefit from the Economic Injury Disaster Loan program. In multiple instances, the
7 same stolen PII was used to submit both unemployment claims and SBA applications.

8 2. ***CARES Act Unemployment Benefits:*** On March 27, 2020, the United
9 States enacted into law the Coronavirus Aid, Relief, and Economic Security (CARES)
10 Act. The CARES Act authorized approximately \$2 trillion in aid to American workers,
11 families, and businesses to mitigate the economic consequences of the COVID-19
12 pandemic. The CARES Act funded and authorized each state to administer new
13 unemployment benefits. These benefits include: (1) Federal Pandemic Unemployment
14 Compensation (FPUC), which provided a benefit of \$600 per week per unemployed
15 worker in addition to existing benefits; (2) Pandemic Unemployment Assistance (PUA),
16 which extends benefits to self-employed persons, independent contractors, and others;
17 and (3) Pandemic Emergency Unemployment Assistance (PEUC), which extends benefits
18 for an additional 13 weeks after regular unemployment benefits are exhausted.

19 3. CARES Act unemployment benefits are funded by the United States
20 government through the Department of Labor and administered at the state level by state
21 agencies known as state workforce agencies (SWAs). The Washington Employment
22 Security Department (ESD) is the SWA for the State of Washington.
23 Applicants can apply online for ESD-administered benefits by accessing Washington's
24 SecureAccess Washington (SAW) web identity validation portal and ESD's
25 Unemployment Tax and Benefit (UTAB) online application system.

26 4. Before submitting an application to ESD, the applicant must establish a
27 SAW account. As part of this process, the applicant must provide the SAW system with
28 an email address. The SAW system then sends, by interstate wire communication

1 originating in Olympia, Washington, an activation link to the email address provided.
2 The user must then click on a link to activate his or her account. This process causes a
3 series of wire transmissions originating at the user's location and terminating in Olympia,
4 Washington.

5 5. After activating the SAW account, the user may proceed to ESD's UTAB
6 application system. To file a claim, the applicant enters his or her PII, to include name,
7 date of birth, and Social Security number. If ESD confirms that the information matches
8 the PII of a person in ESD's records, ESD will pay out benefits via wire (ACH) transfer
9 to a bank or financial account identified by the applicant. Other SWAs accept and
10 process claims following similar procedures.

11 6. ***The Economic Injury Disaster Relief Program:*** The Economic Injury
12 Disaster Loan (EIDL) program is a U.S. Small Business Administration (SBA) program
13 that provides low-interest financing to small businesses, renters, and homeowners in
14 regions affected by declared disasters.

15 7. The CARES Act also authorized the SBA to provide EIDLs of up to \$2
16 million to eligible small businesses experiencing substantial financial disruption due to the
17 COVID-19 pandemic. In addition, the CARES Act authorized the SBA to issue advances
18 of up to \$10,000 to small businesses within three days of applying for an EIDL. The
19 amount of the advance is determined by the number of employees the applicant certifies
20 having. The advances do not have to be repaid.

21 8. In order to obtain an EIDL and advance, a qualifying business must submit
22 an application to the SBA and provide information about its operations, such as the number
23 of employees, gross revenues for the 12-month period preceding the disaster, and cost of
24 goods sold in the 12-month period preceding the disaster. In the case of EIDLs for COVID-
25 19 relief, the 12-month period was that preceding January 31, 2020. The applicant must
26 also certify that all of the information in the application is true and correct to the best of
27 the applicant's knowledge.

1 9. EIDL applications are submitted directly to the SBA and processed by the
2 agency with support from a government contractor, Rapid Finance. The amount of the
3 loan, if the application is approved, is determined based, in part, on the information
4 provided by the application about employment, revenue, and cost of goods, as described
5 above. SBA directly disburses advances and any other funds issued under an EIDL.
6 EIDL funds can be used for payroll expenses, sick leave, production costs, and business
7 obligations, such as debts, rent, and mortgage payments.

8 10. ***Disaster Declarations:*** CARES Act unemployment benefits and EIDLs
9 related to COVID-19 relief are authorized, transferred, disbursed, and paid in connection
10 with a nationwide emergency declared by Presidential Proclamation 9994 (effective as of
11 March 1, 2020) and a Presidential declaration of a major disaster for the State of
12 Washington concerning the COVID-19 pandemic that was issued on March 22, 2020.

13 **B. The Scheme to Defraud**

14 11. Beginning at a time unknown, but no later than April 20, 2020, and
15 continuing through at least February 21, 2021 at Olympia, within the Western District of
16 Washington, and elsewhere, CHUKWUEMEKA ONYEBULA, aka Phillip Carter, and
17 others known and unknown to the Grand Jury, with intent to defraud, knowingly devised
18 a scheme and artifice to defraud and to obtain money and property by means of
19 materially false and fraudulent pretenses, representations and promises, as further
20 described below.

21 12. The essence of the scheme and artifice to defraud was to use the stolen PII
22 of residents of the United States to fraudulently obtain federally-funded benefits,
23 including pandemic-related unemployment benefits administered by SWAs, including
24 ESD, as well as EIDLs administered by the SBA.

25 **C. Manner and Means**

26 The following conduct was part of the scheme and artifice to defraud:
27
28

1 13. ONYEBGULA unlawfully obtained and possessed the stolen PII, to include
2 names, dates of birth, and Social Security numbers, of residents of Washington and other
3 states.

4 14. ONYEBGULA created email accounts, including a Google-administered
5 account with the address “phillipcarter002@gmail.com,” for the purpose of participating
6 in fraudulent transactions while obscuring his identity.

7 15. ONYEBGULA, using foreign and interstate wire transmissions, accessed
8 ESD’s SAW portal, as well as similar portals of other SWAs, including the SWAs for the
9 states of Arizona, California, Colorado, Illinois, Indiana, Kansas, Massachusetts,
10 Michigan, Minnesota, Missouri, Montana, Ohio, Nevada, Rhode Island, Texas, and
11 Wisconsin.

12 16. To establish SAW accounts, ONYEBGULA provided the
13 phillipcarter002@gmail.com email address to ESD and other SWAs as the designated
14 email addresses to receive activation emails from the SWAs to activate fraudulent claims.
15 Each time ONYEBGULA input this email address into the SAW system, an activation
16 email was sent to the phillipcarter002@gmail.com email account. Each of these emails
17 was sent via an interstate wire transmission originating from the State Data Center in
18 Olympia, Washington and passing through a Google data center outside the state of
19 Washington.

20 17. To prevent ESD and other SWAs from recognizing that the same email
21 account was being used to file multiple claims, ONYEBGULA used dozens of variants of
22 the email addresses by placing periods at different locations within the email address for
23 each claim. For example, ONYEBGULA opened SAW accounts and submitted claims
24 using the variants phil.lip.carter002@gmail.com, p.hillip.carter002@gmail.com, and
25 phillip.carter002@gmail.com. This enabled ONYEBGULA to file multiple claims using
26 the same email account, without ESD and other SWAs detecting that they were doing so.

27 18. After establishing SAW accounts, ONYEBGULA used the SAW accounts
28 to access ESD’s UTAB website. ONYEBGULA then filed fraudulent claims for CARES

1 Act unemployment benefits using the stolen PII of Washington residents.
 2 ONYEGBULA similarly used the stolen PII of residents of other states to submit claims
 3 to the SWAs for those respective states using those states' online application systems.

4 19. ONYEGBULA accessed the COVID-19 Economic Injury Disaster page on
 5 SBA's website and submitted applications for EIDLs. ONYEGBULA provided variants
 6 of the phillipcarter002@gmail.com account as the contact email address for the claims.
 7 ONYEGBULA filed the claims using the stolen PII of residents of Washington and other
 8 states.

9 20. ONYEGBULA directed that the benefits be paid to bank or other financial
 10 accounts under his control or the control of co-conspirators. ONYEGBULA and others
 11 then directed that the funds be withdrawn and ultimately transferred to ONYEGBULA
 12 and/or his co-conspirators.

13 **D. Execution of the Scheme and Artifice to Defraud**

14 21. On or about the dates and times set forth below, in Olympia, within the
 15 Western District of Washington and elsewhere, for the purpose of executing and
 16 attempting to execute this scheme and artifice to defraud, CHUKWUEMEKA
 17 ONYEGBULA, and others known and unknown, aiding and abetting each other, did
 18 knowingly transmit and cause to be transmitted by wire communication in interstate and
 19 foreign commerce, writings, signs, signals, pictures and sounds, each transmission of
 20 which constitutes a separate count of this Complaint:

Count	Date and Time (PDT)	Wire Transmission
1	5/11/2020 at 09:26:14	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington
2	5/12/2020 at 14:14:48	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington

3	5/16/2020 at 14:55:45	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington
4	5/16/2020 at 15:57:32	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington
5	5/17/2020 at 00:17:58	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington

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

And the complainant states that this Complaint is based on the following information:

I, Special Agent Heidi Hawkins, being first duly sworn on oath, depose and say:

AFFIANT BACKGROUND AND SCOPE OF AFFIDAVIT

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been since 2019. I am currently assigned to the Seattle Field Office. My primary duties include investigating violations of federal law, including but not limited to, Title 18, United States Code, Sections 1343 (Wire Fraud), 1028A (Aggravated Identity Theft), 1956 (Money Laundering), 1957 (Transactional Money Laundering), and conspiracy to commit these offenses. I attended and graduated from the Basic Field Training Course at the FBI Academy in Quantico, Virginia. At the FBI Academy, part of the training involved learning about the investigative value of the Internet, as well as ways the Internet can be criminally exploited to defraud others.

2. Based on my training and experience, I am familiar with the ways in which individuals involved in fraud schemes use shell e-mail accounts, computers, cellular telephones, Internet Protocol (IP) addresses, bank accounts, synthetic identities, and counterfeit documents to facilitate fraudulent activity. I have learned that individuals perpetrating computer intrusions and identity theft-related bank fraud and wire fraud schemes employ a number of techniques, either alone or in combination, to further their

1 illegal activities and to avoid detection by law enforcement. These techniques include:
2 utilizing web-based email accounts and other electronic messaging accounts to send,
3 receive, store, and obtain personal identifying information (PII), such as dates of birth
4 and bank and credit card account numbers and related information; and the use of cloud-
5 based accounts to communicate and store information and tools related to the fraud. I
6 know that individuals involved in fraud schemes often establish shell e-mail accounts and
7 e-mail addresses in fictitious names and/or in the names of third parties in an effort to
8 conceal their identities and illicit activities from law enforcement. I know that
9 individuals involved in fraud often use virtual private network (VPN) accounts and
10 Internet hosting services to conceal their true identities and geographical locations from
11 law enforcement or other entities.

12 3. The purpose of the Affidavit is to describe the evidence relevant to the
13 existence of probable cause to believe that CHUKWUEMEKA ONYEBULA
14 committed the offenses set forth above. As a result, the information in this Affidavit is
15 limited to that relevant to the existence of probable cause. This Affidavit does not set
16 forth all facts known to me that are relevant to this investigation.

17 **EVIDENCE OF THE CRIMINAL OFFENSES**

18 **A. The CARES Act**

19 **i. CARES Act Unemployment Benefits**

20 4. Based on publicly-available information, I know that on March 27, 2020,
21 the United States enacted into law the Coronavirus Aid, Relief, and Economic Security
22 (CARES) Act. The CARES Act authorized approximately \$2 trillion in aid to American
23 workers, families, and businesses to mitigate the economic consequences of the COVID-
24 19 pandemic. The CARES Act funded and authorized each state to administer, new
25 unemployment benefits. These benefits include (1) Federal Pandemic Unemployment
26 Compensation (FPUC), which provides an additional benefit of \$600 per week per
27 unemployed worker; (2) Pandemic Unemployment Assistance (PUA), which extends
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1 benefits to self-employed persons, independent contractors, and others; and (3) Pandemic
2 Emergency Unemployment Assistance (PEUC), which extends benefits for an additional
3 13 weeks after regular unemployment benefits are exhausted. The CARES Act allows an
4 unemployed worker to obtain back benefits retroactive to the date on which the applicant
5 was affected by COVID-19, which, under program rules, may be as early as February 2,
6 2020.

7 5. CARES Act unemployment benefits are funded by the United States
8 government through the Department of Labor and administered at the state level by state
9 agencies known as state workforce agencies (SWAs). The Washington Employment
10 Security Department (ESD), the component of the State of Washington responsible for
11 administering unemployment benefits, is the SWA for the State of Washington.
12 Applicants apply for ESD-administered benefits using Washington's SecureAccess
13 Washington (SAW) web portal and an ESD-administered site known as the
14 Unemployment Tax and Benefit (UTAB) system.

15 6. Based on interviews with ESD personnel, I know that, to apply for ESD
16 benefits online, a claimant must first open an account with the SAW system. The SAW
17 system is a website hosted at the State Data Center in Olympia, Washington that verifies
18 the identities of users. To open a SAW account, the applicant must access the SAW
19 website, which causes a wire communication to the servers at the State Data Center. The
20 applicant must provide SAW with basic identifying and contact information, to include
21 an email account. The SAW system sends an activation link to the provided email
22 account. The claimant must then access the email account and click the activation link to
23 complete the SAW account setup process. Once that process is complete, the applicant
24 may use his or her SAW account to access UTAB and submit a claim for ESD benefits.

25 7. To submit an ESD claim through UTAB, the applicant must enter his or her
26 PII (including name, date of birth, and Social Security number). ESD checks this
27 information against its database of Washington residents. If ESD confirms that the
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1 information matches the PII of a person in ESD's records, ESD will pay out benefits via
2 wire (ACH) transfer to an account identified by the applicant.

3 **ii. The Economic Injury Disaster Loan Program**

4 8. I know from communications with other federal agents that the Economic
5 Injury Disaster Loan (EIDL) program is a U.S. Small Business Administration (SBA)
6 program that provides low-interest financing to small businesses, renters, and
7 homeowners in regions affected by declared disasters.

8 9. The CARES Act also authorized the SBA to provide EIDLs of up to \$2
9 million to eligible small businesses experiencing substantial financial disruption due to the
10 COVID-19 pandemic. In addition, the CARES Act authorized the SBA to issue advances
11 of up to \$10,000 to small businesses within three days of applying for an EIDL. The
12 amount of the advance is determined by the number of employees the applicant certifies
13 having. The advances do not have to be repaid.

14 10. In order to obtain an EIDL and advance, a qualifying business must submit
15 an application to the SBA and provide information about its operations, such as the number
16 of employees, gross revenues for the 12-month period preceding the disaster, and cost of
17 goods sold in the 12-month period preceding the disaster. In the case of EIDLs for COVID-
18 19 relief, the 12-month period was that preceding January 31, 2020. The applicant must
19 also certify that all of the information in the application is true and correct to the best of
20 the applicant's knowledge.

21 11. EIDL applications are submitted directly to the SBA and processed by the
22 agency with support from a government contractor, Rapid Finance. The amount of the
23 loan, if the application is approved, is determined based, in part, on the information
24 provided by the application about employment, revenue, and cost of goods, as described
25 above. SBA directly disburses advances or any other funds issued under an EIDL. EIDL
26 funds can be used for payroll expenses, sick leave, production costs, and business
27 obligations, such as debts, rent, and mortgage payments.

1 **B. Overview of Investigation**

2 12. I know from my contact with other law enforcement officers that,
3 beginning on around April 20, 2020, officials began receiving complaints from
4 employers about potentially fraudulent unemployment claims. The employers reported
5 that they had received notices from ESD indicating that persons still under their employ
6 had filed unemployment claims. For example, on or about April 20, 2020, the Seattle
7 Fire Department (SFD) notified the U.S. Attorney's Office for the Western District of
8 Washington that claims had been filed in the names of multiple firefighters who were
9 actively employed by SFD. SFD reported that it had interviewed the firefighters, who
10 had denied any involvement in the claims. Other employers, including Microsoft
11 Corporation, the City of Bellingham, Zulily, and Seattle Yacht Club submitted similar
12 complaints.

13 13. Roughly around that same time, numerous investigative agencies, including
14 the Federal Bureau of Investigation, the Social Security Administration Office of
15 Inspector General, the United States Secret Service, the Department of Labor Office of
16 the Inspector General, the United States Postal Inspection Service, and Internal Revenue
17 Service Criminal Investigation, joined the investigation. Agents from these agencies,
18 including myself, have reviewed voluminous financial records and databases reflecting
19 the fraudulent transactions and have conducted dozens of interviews.

20 14. The investigation has developed evidence that hundreds of millions of
21 dollars' worth of fraudulent claims were filed with ESD using the stolen PII of
22 Washington residents. The FBI investigation has determined that many of the fraudulent
23 claims were filed using IP addresses that resolve to Nigeria. While the actual amount of
24 loss is unknown, the Washington State Auditor has issued a report finding that ESD paid
25 out at least \$642,954,417 in fraudulent imposter claims, of which \$369,789,082 has been
26 recovered.

1 **C. Role of Gmail Accounts in the Fraud**

2 15. ESD provided the government with data identifying the email accounts
3 associated with claims submitted over the period of the fraud. The data indicate that
4 thousands of different email accounts, including accounts operated by Google, were used
5 in connection with the filing of the fraudulent claims.

6 16. For many of these Google email accounts, perpetrators took advantage of a
7 particular feature of Google email accounts that allowed them to submit multiple
8 fraudulent claims from a single Google email account, while concealing from ESD the
9 fact that a single email address was being used repeatedly. Specifically, in routing emails
10 to an email box, Google disregards periods in the email address, meaning that the email
11 address “john.doe@gmail.com” and “johndoe@gmail.com” will resolve to the same
12 Google email account, even though ESD identifies them as two different accounts. Two
13 email addresses like these that are distinguished only by periods are known as “Google
14 variants” or “dot variants.” I know from my training and experience that criminals
15 sometimes take advantage of this feature to make it appear that emails are originating
16 from multiple accounts, when in fact they originate from the same account. This reduces
17 the number of email accounts that a criminal must open and monitor while perpetrating a
18 fraud, while avoiding fraud alerts that may be triggered when multiple claims originate
19 from the same account.

20 **D. Use of the phillipcarter002@gmail.com Account**

21 17. Investigators analyzed ESD’s database to identify Gmail accounts that were
22 used to submit multiple claims using the Google dot variant method discussed above.
23 Among these accounts was an account with the address phillipcarter002@gmail.com.
24 Unemployment claims were submitted using different variants of this account. For
25 example, claims were submitted in the names of different Washington residents using the
26 email addresses p.h.i.l.l.i.p.carter002@gmail.com, p.h.illip.carter002@gmail.com, and
27

1 p.hil.l.ip.carter002@gmail.com. For the reasons explained above, each of these addresses
2 resolves to the same account.

3 18. An analysis of SWA claims data by the United States Department of Labor,
4 Office of the Inspector General, indicates that variants of phillipcarter002@gmail.com
5 was used to submit at least 253 claims for unemployment benefits to the SWAs for the
6 states of Arizona, California, Colorado, Illinois, Indiana, Kansas, Massachusetts,
7 Michigan, Minnesota, Missouri, Montana, Ohio, Nevada, Rhode Island, Texas, and
8 Wisconsin. The analysis further shows that at least \$289,604 was paid out on those
9 claims. In addition, data provided by SBA indicates that the email account was used to
10 submit at least 63 applications for EIDL, and that at least \$53,900 was paid out on those
11 applications.

12 **E. The Contents of the phillipcarter002@gmail.com Email Account**

13 **i. Evidence the Account Was Used for Fraud**

14 19. On August 21, 2020, the Honorable Mary Alice Theiler authorized a search
15 warrant for phillipcarter002@gmail.com. The material produced by Google in response
16 to the search warrant confirmed that phillipcarter002@gmail.com and its variants were
17 used to register multiple SAW accounts, which were then used to submit fraudulent
18 claims. For example, the phillipcarter002@gmail.com account contains activation and
19 subsequent emails from ESD indicating that new SAW accounts had been activated.

20 20. The account also contains similar emails from many other SWAs, including
21 the Colorado Department of Labor and Employment, the Michigan Department of Labor
22 and Economic Opportunity, and the Massachusetts Department of Unemployment
23 Assistance. In addition, the account contains many emails from the SBA indicating that
24 the account was used to file applications to participate in the EIDL program.

25 21. The account also contains dozens of tax returns of U.S residents, as well as
26 a host of emails confirming the submission of tax returns, indicating that the account may
27 have been used to seek fraudulent tax refunds. Finally, the account contains lists of PII
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1 and email account login information, suggesting that the account may have been used in
2 connection with business email compromise frauds.

3 **ii. Evidence Tying the Account to CHUKWUEMEKA ONYEBBULA**

4 22. Other evidence within Google's search warrant return suggests that the
5 phillipcarter002@gmail.com account is operated by a resident of Nigeria named
6 CHUKWUEMEKA ONYEBBULA. For example, in a March 9, 2016, email string, the
7 user of the phillipcarter002@gmail.com account was asked for his bank account
8 information. The user responded by providing a Guaranty Trust bank account number
9 0015949393 and the name "ONYEBBULA Chukwuemeka." The email account also
10 contains a U.S. visa application receipt with passport number A04701733 in the name
11 "Chukwuemeka Onyebbula" and two of his family members. In addition, the Google
12 Drive account contains a document that appears to be homework completed by a student
13 with the initials "A.O." ONYEBBULA identified this person as his child on his U.S.
14 visa application dated August 23, 2017. This homework document was attached to an
15 email from the phillipcarter002@gmail.com account sent to c.onyebbula@yahoo.com.

16 23. The search warrant return contained contacts for the
17 phillipcarter002@gmail.com account. The account's contacts included the email address
18 c.onyebbula@yahoo.com and an account with the similar address of
19 c.onyebbula@pocng.com. Based on internet research, I have determined that the
20 domain "pocng.com" belongs to a Nigerian petroleum company called Pan Ocean Oil
21 Corporation Nigeria Limited. I have reviewed the 2017 visa application submitted by
22 CHUKWUEMEKA ONYEBBULA in which he lists his occupation as an engineer with
23 Pan Ocean Oil Corporation Nigeria Limited. In the visa application, CHUKWUEMEKA
24 ONYEBBULA also lists his email address as c.onyebbula@yahoo.com.

25 24. The phillipcarter002@gmail account has several other connections to the
26 c.onyebbula@yahoo.com account. For example, on October 10, 2015,
27 phillipcarter002@gmail.com sent an email to c.onyebbula@yahoo.com with no message
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1 but three text file attachments. Each of the text files contains a list of PII, such as social
2 security numbers, dates of birth, email addresses, passwords, and answers to challenge
3 questions. Similarly, on August 29, 2016, the phillipcarter002@gmail.com account
4 forwarded an email to c.onyegbula@yahoo.com with no message but with what appears
5 to be a Dropbox (a cloud storage service) file share link. I know from my training and
6 experience that criminals operating multiple email accounts sometimes forward emails
7 from one account to the other as a way of moving information between accounts.

8 25. I obtained Yahoo subscriber records for the c.onyegbula@yahoo.com
9 account. The records indicated that the subscriber's name on the
10 c.onyegbula@yahoo.com account is CHUKWUEMEKA ONYEBBULA, and that the
11 account was established on November 23, 2007 and remains active. The phone number
12 associated with the c.onyegbula@yahoo.com is the Nigerian number (234) 8035376640
13 and the recovery email associated to the account is c.onyegbula@poocong.com, both of
14 which ONYEBBULA provided on his 2017 visa application.

15 26. Yahoo also provided a list of IP addresses from which the
16 c.onyegbula@yahoo.com was accessed. I noted that one particular IP address—
17 102.67.0.75—was used to access the c.onyegbula@yahoo.com 19 times between July 1,
18 2020 and January 14, 2021. I then compared that IP address to IP information provided
19 by Google for phillipcarter002@gmail.com. Google reported IP information for nine
20 different sessions between July 7, 2020 and August 4, 2020. For six of those nine
21 sessions, the phillipcarter002@gmail.com account was accessed from IP address
22 102.67.0.75—the same IP address used to access the c.onyegbula@yahoo.com account.
23 The fact that the two accounts were repeatedly accessed from the same IP address over
24 approximately the same period of time indicates that the operators of the accounts are the
25 same person, or at least closely related.

26 27. On February 23, 2021, the government obtained a pen register and trap and
27 trace device (PRTT) for the WhatsApp account associated with the phone number (234)
28 8035376640 (the phone number associated with the c.onyegbula@yahoo.com account

1 and listed on ONYEGBULA’S visa application). Data produced by the PRTT indicate
2 that, over the period between March 4, 2021 and April 9, 2021, the user of this phone
3 number repeatedly accessed the account from the IP address 102.67.0.75—the same IP
4 address used to access the phillipcarter002@gmail.com account and the
5 c.onyegbula@yahoo.com account.

6 **F. Contents of the c.onyegbula@yahoo.com Account**

7 28. On April 15, 2021, the Honorable Michelle Peterson authorized a search
8 warrant for the c.onyegbula@yahoo.com account. The material produced by Yahoo in
9 response to the search warrant confirmed that c.onyegbula@yahoo.com is owned by
10 ONYEGBULA and is closely connected to the phillipcarter002@gmail.com account.

11 29. Among the items found in the c.onyegbula@yahoo.com account are at least
12 two images of an individual who matches the physical appearance of ONYEGBULA in
13 his 2017 visa application photo.

14 30. The search warrant return also contained contacts for the
15 c.onyegbula@yahoo.com account. These contacts included email address
16 c.onyegbula@poocong.com—the same email address that was a contact for the
17 phillipcarter002@gmail.com account and that ONYEGBULA listed on his 2017 visa
18 application.

19 31. The c.onyegbula@yahoo.com search warrant return also included multiple
20 statements of accounts from Polaris bank addressed to “Mr. CHUKWUEMEKA
21 ONYEGBULA” reflecting his salary from Pan Ocean Oil Corporation. Pan Ocean Oil
22 Corporation is the company ONYEGBULA listed as his employer on his 2017 visa
23 application. It is also the company that resolves to ONYEGBULA’S
24 c.onyegbula@poocong.com email account.

25 32. The c.onyegbula@yahoo.com account also contained an email with subject
26 “Paycheck Direct Deposit” from an individual to c.onyegbula@poocong.com,
27 c.onyegbula@yahoo.com, phillipcarter002@gmail.com, and
28

1 Chukwuemeka.onyegbula@newcross.com. All four email accounts were listed in the
2 “To” line of the email header and are associated to ONYEGBULA. Therefore, based on
3 my training and experience, ONYEGBULA was very clearly the intended recipient of the
4 email.

5 33. In addition, as referenced above, the phillipcarter002@gmail.com account
6 contained an email reflecting ONYEGBULA’s Guaranty Trust (GT) Bank account
7 number 0015949393. Within the c.onyegbula@yahoo.com account, there are also
8 numerous GT Bank statements in the name of “ONYEGBULA, CHUKWUEMEKA”
9 with savings account number 0015949393. This account number is the same account
10 referenced within both email accounts.

11 34. The c.onyegbula@yahoo.com account also includes an image of a Nigerian
12 Passport for a child with initials A.O. and passport number A08403026, which is the
13 same child listed as ONYEGBULA’s dependent on his 2017 visa application. This is
14 same visa application associated with the visa application receipt found in the
15 phillipcarter002@gmail.com account. That receipt also referenced A.O. as a dependent
16 of ONYEGBULA’s with passport number A08403026. The passport number and
17 dependent information are the same within both email accounts.

18 35. Further, the c.onyegbula@yahoo.com account includes emails from what
19 appears to be an educational program in which A.O. is frequently referenced as a child of
20 ONYEGBULA. Payments to this same educational program are deducted from
21 ONYEGBULA’s GT Bank account number 0015949393. The
22 phillipcarter002@gmail.com account also references the same GT Bank account.

23 **G. Interviews of Washington State Victims**

24 36. I have interviewed three Washington state residents whose PII was used to
25 file claims with SAW accounts activated by phillipcarter002@gmail.com. Each person
26 confirmed that (1) he or she did not file an ESD claim; (2) the PII used in the claim was
27 his or her PII; and (3) the email address phillipcarter002@gmail.com was not his or her
28 email address.

1 **H. Evidence Relevant to Charged Wire Transmissions and Uses of Stolen**
 2 **Identities.**

3 37. As discussed above, the phillipcarter002@gmail.com account contains
 4 emails from the SAW system. Some of these emails contain activation links sent by the
 5 SAW system. I know from my interviews with ESD personnel that SAW sends these
 6 activation emails from the State Data Center in Olympia, Washington. I also know from
 7 my training and experience that any email sent to a Gmail account must be routed to a
 8 Google data center. I have reviewed a map produced by Google identifying all of its data
 9 centers. None of the data centers are located in the State of Washington. Accordingly,
 10 each activation email necessarily travelled from the State Data Center in Olympia, over
 11 interstate wires, to a Google data center in another state.

12 38. The following is a list of some of the activation emails I found in the
 13 phillipcarter002@gmail.com account:

Date and Time (PDT)	Interstate Wire Transmission
5/11/2020 at 09:26:14	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington
5/12/2020 at 14:14:48	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington
5/16/2020 at 14:55:45	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington
5/16/2020 at 15:57:32	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington
5/17/2020 at 00:17:58	Account activation email from the State Data Center in Olympia, Washington to the email account phillipcarter002@gmail.com via a Google server outside of Washington

1 39. The evidence discussed above establishes probable cause to believe that
2 CHUKWUEMEKA ONYEBBULA used the phillipcarter002@gmail.com account to
3 submit fraudulent unemployment claims to ESD and other states, and to submit
4 fraudulent applications to the SBA for EIDLs. Based on all of this evidence, there is
5 probable cause to believe that CHUKWUEMEKA ONYEBBULA committed the
6 offenses alleged above.

7
8 

9 HEIDI HAWKINS
10 Complainant
11 Special Agent, FBI

12 The above-named agent provided a sworn statement attesting to the truth of the
13 contents of the foregoing affidavit by telephone on this 6th day of June, 2021. The Court
14 hereby finds that there is probable cause to believe the Defendant committed the offenses
15 set forth in the Complaint.

16
17 

18 THE HONORABLE J. RICHARD CREATURA
19 Chief United States Magistrate Judge