

**FILED**

DEC 17 2019

United States District Court  
Western District of Texas  
Austin Division

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY AP  
DEPUTY CLERK

United States of America  
Plaintiff

v.

Ekeoma Jerry Onyeukwu  
a.k.a. Jerry Ekeoma Onyeukwu  
Defendant

Criminal Number: **A19CR 324LY**

**Indictment**

[Counts 1-2: 18 U.S.C. § 1343, Wire Fraud]

The Grand Jury Charges:

**Counts 1-2**  
Wire Fraud  
18 U.S.C. § 1343

1. At all times material to this Indictment, the Texas State Securities Board is a state agency whose mission is to protect Texas investors, including by regulating securities and enforcing the Texas Securities Act. BitConnect was an England-based company promising investors, including Texas residents, high monthly returns if they buy the company's cryptocurrency. In early 2018, BitConnect shut down, after a cease and desist order from the Texas State Securities Board for fraud and failure to register.

2. From at least November 2018, and continuing through at least April 2019, in the Western District of Texas, and elsewhere,

**EKEOMA JERRY ONYEUKWU**

and others, knowingly and intentionally devised and participated in a scheme to defraud and obtain money and property by material misrepresentations and concealment of material facts, using the following manner and means:

3. It was part of the scheme to register the domain names ssb-texas.us and ssb-tesax.us, and host a website at ssb-tesax.us which was deceptively designed to resemble the authentic Texas State Securities Board website hosted at ssb.texas.gov. The phony website

falsely promised that the Texas State Securities Board would refund 35% of money invested in BitConnect, and directed victims of the BitConnect scheme to fill out an online consent form to receive a refund.

4. It was further part of the scheme to register the domain name bitconnect.co, and host a website which was deceptively designed to resemble the actual BitConnect website previously hosted at bitconnect.co and bitconnectcoin.co. The phony website falsely claimed that BitConnect was controlled by the Texas State Securities Board.

5. It was further part of the scheme that EKEOMA JERRY ONYEUKWU sent emails to Texas residents, including in the Western District of Texas, using the email address refund@ssb-texas.us, falsely claiming to represent the Texas State Securities Board and falsely promising to return 35% of money invested in BitConnect, in exchange for a \$300 "consent fee." EKEOMA JERRY ONYEUKWU knowingly made these false claims intending to deceive his victims into believing their payments were going to the Texas State Securities Board, and intending to keep the payments.

6. On or about the dates listed below, with the intent and purpose of executing this fraudulent scheme, EKEOMA JERRY ONYEUKWU knowingly caused to be transmitted by interstate and foreign wire communication the writings specified below:

<b>Count</b>	<b>On or About Date</b>	<b>Email Sender</b>	<b>Email Recipient</b>
1	12/8/18	TEXAS STATE SECURITY BOARD <refund@ssb-texas.us>	E.F. <ef [REDACTED]@gmail.com>
2	12/12/18	TEXAS STATE SECURITY BOARD <refund@ssb-texas.us>	E.F. <ef [REDACTED]@gmail.com>

Each in violation of 18 U.S.C. § 1343.

## Notice of Government's Demand for Forfeiture

7. As a result of the criminal violations set forth in Counts 1 and 2, the United States gives notice that it intends to forfeit the below-listed property from EKEOMA JERRY ONYEUKWU. EKEOMA JERRY ONYEUKWU shall forfeit all right, title, and interest in said property to the United States pursuant to FED. R. CRIM. P. 32.2 and 18 U.S.C. § 981(a)(1)(C), which is made applicable by 28 U.S.C. § 2461(c). Section 981 provides:

18 U.S.C. § 981. Civil Forfeiture

(a)(1) The following property is subject to forfeiture to the United States:

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting "specific unlawful activity" (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

This notice of demand for forfeiture includes, but is not limited to the following:

### Money Judgment:

A sum of money that represents the amount of proceeds obtained, directly, or indirectly, as a result of the violations set forth in the Indictment for which EKEOMA JERRY ONYEUKWU is liable.

### Substitute Assets:

If any of the property described above, as a result of any act or omission by EKEOMA JERRY ONYEUKWU:

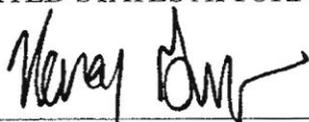
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be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

it is the intent of the United States to seek the forfeiture of any other property owned by EKEOMA JERRY ONYEUKWU up to the value of said money judgment as substitute assets, pursuant to FED. R. CRIM. P. 32.2 and 21 U.S.C. § 853(p).

A TRUE BILL:

ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

JOHN F. BASH  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Neeraj Gupta", written over a horizontal line.

NEERAJ GUPTA  
Assistant United States Attorney