



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

ROBERT MUTUA MULI,

Defendant.

Case No. 1:19-CR-186-LO

Count 1: 18 U.S.C. § 1349
(Conspiracy To Commit Wire Fraud)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From in or about April 2018 through in or about September 2018, in the Eastern District of Virginia and elsewhere, the defendant, ROBERT MUTUA MULI, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to commit an offense against the United States, namely wire fraud, that is: having knowingly devised a scheme to defraud or obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

Fraud Against Victim 1

2. On June 18, 2018, MULI opened a checking/money market business account ("Subject Account 1"), in the name of Rogram Home Improvement LLC at First Commonwealth Bank. Rogram Home Improvement is an Ohio-based limited liability company, and MULI is its registrant, incorporator, and owner. MULI opened the account as the owner of Rogram Home

Improvement. At all times, MULI controlled Subject Account 1 and Rogram Home Improvement.

3. In and between August 2018 and September 2018, Victim 1, a county government in the Eastern District of Virginia, possessed an agreement with Dell Marketing LP (“Dell”) to purchase equipment to meet the computer hardware needs of Victim 1’s public school. Dell Employee 1, Victim 1’s principal point of contact at Dell, provided contract administrator services to Victim 1.

4. On August 6, 2018, Victim 1 received an email from an account falsely claiming to be Dell Employee 1, requesting a change to the destination account for Victim 1 payments to Dell. In fact, the email was from Co-conspirator 1, located in Kenya. The fraudulent account’s email address was closely similar to Dell Employee 1’s true email address. Co-conspirator 1’s email included a Victim 1 Vendor Agreement with revised Automated Clearing House (“ACH”) information for Dell. The revised information changed the routing number and account number to Subject Account 1, controlled by MULI, and the depository institution name to First Commonwealth Bank. The revisions changed the email address for notices of payment to Co-conspirator 1’s fraudulent email account. The email also included a voided check issued by First Commonwealth Bank, which reflected Dell’s true name and address.

5. From about August 8, 2018 through about September 7, 2018, Victim 1 sent twenty-eight ACH payments, totaling \$1,345,423.20 to Subject Account 1 for county government computing needs. Each of these interstate wire transfers was in furtherance of the defendant’s fraudulent schemes and caused interstate wire transfers that began or ended in the Eastern District of Virginia.

Fraud Against the City of Detroit

6. On February 22, 2018, MULI opened a business checking account (“Subject Account 2”), in the name of Rogram Home Improvement at Wells Fargo Bank. In the application to open the account, MULI declared that he was the sole owner of Rogram Home Improvement.

7. Between May 2018 and July 2018, the City of Detroit possessed an agreement with AECOM Great Lakes Inc. to meet the sales needs of the city.

8. On May 14, 2018 Co-conspirator 1 sent an email to the City of Detroit, from an email account falsely claiming to be an AECOM Great Lakes employee, directing the City of Detroit’s Office of Contracting and Procurement to change the AECOM Great Lakes bank of record to Wells Fargo, and directing payments to Subject Account 2, which was controlled at all times by MULI. The email account name matched the name of a former AECOM employee.

9. On May 25, 2018, the City of Detroit made a \$69,464.02 ACH payment to Subject Account 2. On June 1, 2018, a second ACH payment of \$699,802.83 was made to Subject Account 2.

Fraud Against the City of Philadelphia

10. On or about November 24, 2017, MULI opened a business checking account (“Subject Account 3”), in the name of Rogram Home Improvement at PNC Bank.

11. In May 2018, the City of Philadelphia Department of Finance possessed an agreement with Dell to purchase equipment to meet the computer needs of the city government.

12. On May 16, 2018, Co-conspirator 1 emailed the City of Philadelphia Department of Finance, from an email account falsely claiming to be from the legitimate Dell representative, requesting a change to the destination account for the City of Philadelphia Department of Finance

payments to Dell. The request included a City of Philadelphia Department of Finance “ACH Vendor Enrollment and Change Form” with revised ACH information for Dell. The revised information changed the routing number and the account number to Subject Account 3, controlled by MULI, and the depository institution name to PNC Bank. The email from Co-conspirator 1 also provided a voided check from Subject Account 3, which reflected Dell’s true name and address.

13. On May 25, 2018, the City of Philadelphia Department of Finance sent, via one ACH payment, \$230,858.24 to Subject Account 3, at all times in the possession of MULI and in the name of Rogram Home Improvement, for city government computing needs.

Fraud Against the State of Vermont

14. In April 2018, the State of Vermont possessed an agreement with Dell to purchase equipment to meet the computer needs of the state government.

15. On April 27, 2018, Co-conspirator 1 sent an email to the State of Vermont, from an email account falsely claiming to be a Dell employee, requesting a change to the destination account for the State of Vermont payments to Dell. The request included a State of Vermont “ACH Vendor Enrollment and Change Form” with revised ACH information for Dell. The revised information changed the routing number and the account number to Subject Account 3, controlled by MULI, and the depository institution name to PNC Bank. The email from Co-conspirator 1 also provided a voided check from Subject Account 3, which reflected Dell’s true name and address.

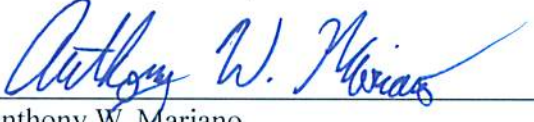
16. Between May 7, 2018 and June 25, 2018, the State of Vermont sent, via ten ACH payments, \$13,684.63 to Subject Account 3 for state government computing needs.

(In violation of Title 18, United States Code, Section 1349.)

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

Date:

By: 

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Uzo Asonye
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