

# DSA BUREAU OF INVESTIGATION

For the  
  
Nigerian Cyber Crime  
Investigation Dept.

DSA BUREAU OF INVESTIGATION.

Vs  
Mr. Sam  
aka “Sammy”

Case No.      DSA/CS/SQ1/001

Defendant

---

## CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, Agent Akachukwu, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning no later than March 17th, 2024 at about 04:19:10 WAT and continuing through at least the month of March, 2024, in the county of Nigeria, in the Economic District Capital of Lagos, and elsewhere, the defendant conspired to launch a fake investment platform to lure unsuspecting victims into investing in a non-existing business venture.

*Code Section*

001 DSA CS SQD (1)

*Offense Description*

Conspiracy to launch a fake investment platform

This criminal complaint is based on these facts:

*Please see attached affidavit.*

\_ Continued on the attached sheet.

---

*Complainant's signature*

---

Okafor D. Akachukwu. Special Agent, DSA  
*Printed name and title*

---

## **AFFIDAVIT**

I, OKAFOR D. AKACHUKWU, being duly sworn, declare and state as follows;

### **INTRODUCTION**

1. I am a Special Agent with the DSA Dept. of Cyber Investigation (“DSA”), and have been so employed since approximately March 2025. I am currently assigned to the Bonny Island Field Office, High-Tech Organized Crime Squad, where I primarily investigate cyber-enabled fraud and business email compromise (“BEC”) schemes. During my career as DSA Special Agent, I have participated in numerous computer- crime investigations. In addition, I have received both formal and informal training from the DSA and other institutions regarding computer-related investigations, computer technology, and white-collar fraud.

2. This affidavit is made in support of a criminal complaint against, and arrest warrant for, SAMUEL JACKSON LIVISTONE , also known as (“aka”) “Sam,” aka “Sammy”, for violation of *001 DSA CS SQD(1)* (Conspiracy to engage in Cybercrime/Scam through fake online Investment platform).

3. The facts set forth in this affidavit are based upon my personal involvement in this investigation, my review of reports and other documents related to this investigation, my training and experience, and information obtained from other agents, law enforcement officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of the government’s investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only. Unless specifically indicated otherwise, all dates set

forth below are “on or about” tools and methodology, the dates indicated, and all amounts or sums are approximate.

## **METHODOLOGY AND TOOLS**

### **Tools Used:**

1. - Autopsy (Sleuth Kit GUI): Primary tool for forensic analysis.-
2. Android Analyzer Module: For parsing call logs, SMS, contacts, etc.
3. - File Type Identifiers: For locating media, documents, and applications

### **Methodology:**

1. Image Acquisition: The Android image file was provided (assumed .img or .dd).
2. Case Setup in Autopsy: New case created, image ingested, and modules enabled.
3. Analysis Performed: - File System Examination.
  - Artifact Extraction (SMS, Contacts, Call Logs, Installed Apps)
  - Keyword Search & Hash Filtering - Media File Recovery (e.g., images, audio video)
  - Internet History & Communication

## **FINDINGS AND PROBABLE CAUSE**

4. SAMUEL JACKSON LIVISTONE is a Nigerian national living in the Nigeria, Lagos State. The DSA’s investigation has revealed that SAMMY

finances this opulent lifestyle through crime, and that he is one of the leaders of a transnational network that facilitates computer intrusions, fraudulent schemes (including BEC schemes), targeting victims around the world in schemes designed to steal hundreds of millions of dollars. SAMMY participated in these fraudulent schemes and money laundering in coordination with multiple coconspirators, including the persons referred to herein as Coconspirator 1 and Coconspirator 2.

5. This affidavit discusses several fraudulent schemes involving SAMMY. First, messages found on the Android phone of Coconspirator 1 (reviewed pursuant to a federal search warrant issued in this District) reflect that SAMMY, Coconspirator 1, and Coconspirator 2, with others, committed fraud/scam that defrauded victims in Lagos State of approximately \$105,200, including

Below are excerpt (Exhibit A) conversation from his Android Phone with his co-conspirator (Conspirator 1 & 2);

- i. *Hey, I've got a new scam idea. we need to discuss.*
- ii. *Sure, I'm in. What's the plan this time?*
- iii. *Let's create a fake investment website and lure people into investing in a non-existent cryptocurrency. We'll promise huge returns.*
- iv. *Sounds good. Do you have the website ready?*
- v. *Hey Egbon, I've set up a new website for our next venture. Check it out: <https://apyeth.gifts/>*
- vi. *I feel you man, I am in on this fully, but not high value client we go Target this time around.*
- vii. *Sure, enough of this text messages. Meet me over Google Meet by 10pm. Here is the meeting link: <https://meet.google.com/abcd-efgh-ijkl>*

- viii. *Nice work, Sammy. I'll take a look at the site. Are we using the same tactics as before?*
- ix. *Yes, but this time we're targeting investors with promises of exclusive access to a "revolutionary" crypto currency technology. The website layout is designed to mimic legitimacy, complete with fake testimonials and fabricated investment portfolios.*
- x. *Sounds convincing. Payment gateway nkor? Are we still using the same Bitcoin wallet address?*
- xi. *Yes, use the same Bitcoin wallet address as before:  
16AtGJbaxL2kmzx4mW5ocpT2ysTWxmacWn.*
- xii. *No, I've set up a new wallet address for this operation. Here it is: 1K1KMHpynJHQRBhzKHyik6yaJuQYxSaZCm*
- xiii. *Got it. I'll update the payment instructions on the website accordingly. When we dey go live?*
- xiv. *We'll launch the website next week. In the meantime, spread the "good news" discreetly through our Network of affiliates and social media channels, telegram is very important. We want to create a buzz without attracting unwanted attention.*
- xv. *Understood omo iya mi. I'll handle the promotional activities and monitor for any potential leaks. This one go be bang Inshallah*

7. Other communications between SAMMY (SAM) and Coconspirator 1 indicate that, in addition to these schemes, SAMMY (SAM) and Coconspirator 1 conspired to launder tens, and at times hundreds, of millions of dollars that were proceeds of other fraudulent schemes and computer intrusions, including a fraudulent scheme.

8. Analysis of Coconspirator 1's Android and other online accounts showed that Coconspirator 1 operated and tasked money mule crews for a number of fraudulent schemes, including BEC schemes and cyber-heists. Analysis also showed that Coconspirator 1 communicated with the Nigerian phone number +2348032111669 ("Phone Number 1") about multiple fraudulent schemes and money laundering. As described below, Phone Number 1 was one of the phone numbers SAMMY (SAM) used during 2024 and 2025.

9. Based on my review (pursuant to federal search warrants obtained in this District) of data from Coconspirator 1's Android phone and from a Bitcoin online Wallet account connected to that phone;

*1K1KMHpynJHQRbhZKHyik6yaJuQYxSaZCm* (the "Online Account"), other law enforcement personnel's review of that digital data, and from discussions with The Nigerian State Secrete Services (SSS) and DSA personnel, I know the following:

a. Coconspirator 1's Android phone listed Phone Number 1 (+2348032111669) with the contact name "Sam." The phone also contained a url for a website set up by "Sam's" co-conspirator; <https://apyeth.gifts/>

b. Searches of Phone Number 1 and the contact name "Sam" in Coconspirator 1's Android phone revealed messaging conversations between "Sam," using Phone Number 1, and Coconspirator 1.

Below is the call log also found on "Sam's" Android phone;

Start Date/Time	Phone Number
2024-03-16 20:45:54 WAT	9.71566E+11
2024-03-16 20:49:50 WAT	8032111669
2024-03-16 20:51:59 WAT	8032111225
2024-03-17 02:54:56 WAT	8032111669
2024-03-17 16:17:36 WAT	8032111225
2024-03-17 16:18:04 WAT	8032111225
2024-03-17 16:18:22 WAT	8032111225
2024-03-17 16:21:46 WAT	8012345678
2024-03-17 16:24:09 WAT	8032111669
2024-03-17 16:23:25 WAT	9.71544E+11
2024-03-17 16:25:20 WAT	8032111133
2024-03-17 16:36:15 WAT	8032111669
2024-03-17 16:36:21 WAT	8032111669
2024-03-17 16:36:28 WAT	8032111669

List of installed programs;

B	C
Program Name	Comment
com.google.android.youtube	Installed Apps GSM
com.squareup.cash	Installed Apps GSM
com.twitter.android	Installed Apps GSM
com.whatsapp	Installed Apps GSM
wallettrust.applpy.crypto	Installed Apps GSM
com.google.android.youtube	Installed Apps GSM
com.squareup.cash	Installed Apps GSM
com.twitter.android	Installed Apps GSM
com.whatsapp	Installed Apps GSM
wallettrust.applpy.crypto	Installed Apps GSM

## **CONCLUSION**

For all the reasons described above, there is probable cause to believe that SAMMY (SAM) has committed a violation of *001 DSA CS SQD (1)* (Conspiracy to Engage in Cyber Crime/Scam).

---

OKAFOR D. AKACHUKWU.  
Special Agent DSA Bureau of  
Investigation

Attested to by the applicant in  
accordance with the requirements of  
Fed. R. Crim. P. 4.1 by telephone on  
2<sup>nd</sup> June, 2025.

---

THE HONOURABLE JUDGE