

4. Defendant ADEBOWALE AYODEJI OWOAJE, and others known and unknown to the grand jury, contacted an individual listing an item for sale on Craigslist (“the seller”) and reached an agreement with the seller on the sales price.

5. Defendant ADEBOWALE AYODEJI OWOAJE, and others known and unknown to the grand jury, sent counterfeit cashier’s checks to Co-conspirator #1, and others known and unknown to the grand jury. Based on instructions from defendant OWOAJE, Co-conspirator #1 typed an amount on a cashier’s check that exceeded the sales price agreed to by OWOAJE and the seller. Co-conspirator #1, and others known and unknown to the grand jury, then mailed this counterfeit cashier’s check to the seller.

6. Defendant ADEBOWALE AYODEJI OWOAJE informed the seller that a check in the wrong amount was sent to them by “mistake.” Defendant OWOAJE then asked the seller to deposit the check in the seller’s bank account and to keep the amount OWOAJE owed the seller plus an additional sum for their trouble. Defendant OWOAJE asked the seller to wire the balance of the money via Western Union to Co-conspirator #1, and others known and unknown to the grand jury, whom OWOAJE falsely represented to the seller as his “secretary.”

7. Co-conspirator #1, and others known and unknown to the grand jury, retrieved the funds that the seller wired through Western Union. Co-conspirator #1, and others known and unknown to the grand jury, kept some of the funds and wired the remaining funds via Western Union to defendant ADEBOWALE AYODEJI OWOAJE, and others known and unknown to the grand jury.

8. Through this fraudulent scheme, defendant ADEBOWALE AYODEJI OWOAJE, Co-conspirator #1, and others known and unknown to the grand jury, received and transferred over \$100,000 in stolen proceeds from sellers on Craigslist.

9. On or about each of the dates set forth below, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ADEBOWALE AYODEJI OWOAJE,
a/k/a “David Smith,”
a/k/a “David Samuel,”**

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION OF WIRE
1	July 22, 2009	Wire transfer of approximately \$1,799.99 from L.D. to Co-conspirator #1, transmitted from Santa Ana, California to Philadelphia, Pennsylvania
2	July 23, 2009	Wire transfer of approximately \$1,500 from Co-conspirator #1 to defendant ADEBOWALE AYODEJI OWOAJE, transmitted from Philadelphia, Pennsylvania to Lagos, Nigeria
3	July 27, 2009	Wire transfer of approximately \$2,350 from E.H. to Co-conspirator #1, transmitted from San Diego, California to Philadelphia, Pennsylvania
4	July 29, 2009	Wire transfer of approximately \$1,950 from Co-conspirator #1 to defendant ADEBOWALE AYODEJI OWOAJE, transmitted from Wynnewood, Pennsylvania to Lagos, Nigeria

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1343, set forth in this indictment, defendant

**ADEBOWALE AYODEJI OWOAJE,
a/k/a “David Smith,”
a/k/a “David Samuel,”**

shall forfeit to the United States of America, any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this information.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (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 divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), and Title 18, United States Code, Sections 981 and 982, to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Sections 981(a)(1)(C) and 982(a)(1), (2).

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**