

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CRIMINAL NO. 11-87 (MJD/JJK)

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

1. JULIAN OKEAYAINNEH,  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh,

Identities assumed of real people:

- a/k/a K.M.,
- a/k/a W.H.,
- a/k/a A.C.,
- a/k/a D.T.,
- a/k/a B.M.,
- a/k/a P.J.,
- a/k/a M.E.,
- a/k/a D.T.,
- a/k/a J.M.,
- a/k/a L.V.,
- a/k/a S.F.,
- a/k/a M.W.E.,
- a/k/a S.S.,
- a/k/a G.R.,
- a/k/a K.B.,
- a/k/a G.L.,
- a/k/a A.M.,
- a/k/a R.T.,
- a/k/a L.D.,
- a/k/a D.M.,
- a/k/a G.L.,
- a/k/a L.D.,
- a/k/a D.M.,
- a/k/a G.L.,
- a/k/a A.N.,
- a/k/a S.N.,
- a/k/a M.C.,
- a/k/a D.C.,

2. OLADIPO SOWUNMI COKER,  
a/k/a Oladipo Sawunmi Coker,

) THIRD SUPERSEDING  
) INDICTMENT

- ) (18 U.S.C. § 2)
- ) (18 U.S.C. § 225)
- ) (18 U.S.C. § 1028)
- ) (18 U.S.C. § 1028A)
- ) (18 U.S.C. § 1341)
- ) (18 U.S.C. § 1343)
- ) (18 U.S.C. § 1344)
- ) (18 U.S.C. § 1349)
- ) (18 U.S.C. § 1956(h))

SCANNED

JAN 10 2012

U.S. DISTRICT COURT ST. PAUL

FILED JAN 10 2012  
RICHARD D. SLETTEN, CLERK  
JUDGMENT ENTD \_\_\_\_\_  
DEPUTY CLERK \_\_\_\_\_

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- a/k/a Aron Meshan, )
- a/k/a Dipo, )
- a/k/a Dupo, )
- a/k/a Debo, )
- a/k/a Depo, )
- a/k/a Deepo, )
- a/k/a D, )
- a/k/a Dee, )
- )
- 3. CHARLES AMANKWAH AKUFFO, )
- a/k/a Charles Amankwah, )
- )
- 4. NANA OSEI-TUTU, )
- )
- 6. FATA LEETA SARNOR DAVID, )
- )
- 9. OLUGBENGA TEMIDAGO ADENIRAN, )
- a/k/a Olugbenga Temidayo Adeniran, )
- a/k/a Dennis Lok, )
- a/k/a Dayo Olugbega, )
- a/k/a Andre T. Andeiran, )
- a/k/a Andeniran T. Dayo, )
- a/k/a Oluwafemi Olarewaju Osibodu, )
- a/k/a Dayo, )
- a/k/a Dre, and )
- )
- 13. BETTY WHITE, )
- a/k/a Aunt Betty, )
- a/k/a Momma, )
- a/k/a Michelle Kaough, )
- a/k/a Michelle Linda Kaough, )
- a/k/a Betty Moore, )
- a/k/a Betty M. Moore, )
- a/k/a Betty Marie Moore, )
- a/k/a Betty Morrisen, )
- a/k/a Betty Morrison, )
- a/k/a Elizabeth Walker, )
- a/k/a Betty Elizabeth White, )
- a/k/a Betty M. White, )
- a/k/a Betty Marie White, )
- a/k/a Shiana White, )
- a/k/a L.H., )

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Defendants. )

THE UNITED STATES GRAND JURY CHARGES THAT:

Introduction

1. During a period from in or about 2006 to in or about March 2011, the defendants, conspiring with and aiding and abetting one another and others, devised and participated in a scheme to defraud banks and bank customers using stolen identities, stolen and fraudulently created bank accounts, counterfeit checks, and fraudulently obtained credit card accounts. In furtherance of this fraud, the defendants recruited numerous individuals to conduct fraudulent transactions and utilized bank employees to fraudulently access victims' account information and engage in fraudulent financial transactions.

2. At all times relevant to this indictment the following financial institutions did business in the State of Minnesota and elsewhere and held deposits insured by the Federal Deposit Insurance Corporation or the National Credit Union Share Insurance Fund:

- a. American Express;
- b. Anchor Bank;
- c. Associated Bank;
- d. Bank of America;

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- e. Capital One;
- f. Guaranty Bank;
- g. JP Morgan Chase Bank;
- h. TCF Bank;
- i. US Bank;
- j. Wachovia Bank;
- k. Washington Mutual;
- l. Wells Fargo Bank;
- m. Citibank;
- n. Fidelity;
- o. Wescom Credit Union;
- p. Bank of the West;
- q. Discover Card;
- r. Comerica Bank;
- s. Union Bank; and
- t. USSA Bank

(hereinafter referred to as the "Financial Institutions").

3. At all times relevant to this indictment:

a. Defendant Julian Okeayainneh resided in the State of California and provided participants in the fraud scheme with stolen means of identification and bank account information which were used to commit fraud against Financial Institutions; "means of

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identification," as used in this indictment, means any name or number that may be used, alone or in conjunction with any other information to identify a specific individual;

b. Defendant Oladipo Sowunmi Coker resided in the State of Minnesota and recruited individuals to assume stolen identities of other persons to create fraudulent bank and credit card accounts and to conduct fraudulent financial transactions;

c. Defendant Charles Amankwah Akuffo resided in the State of Minnesota and assisted with the execution of fraudulent transactions at Financial Institutions;

d. Defendant Nana Osei-Tutu resided in the State of Minnesota, was employed as a Personal Banker, and assisted with the execution of fraudulent transactions at Financial Institutions;

e. Defendant Fata Leeta Sarnor David resided in the State of Minnesota, was employed as a Personal Banker, and assisted with the execution of fraudulent transactions at Financial Institutions;

f. Defendant Olugenga Temidago Adeniran resided in the State of New York and assisted with the execution of fraudulent transactions at Financial Institutions;

g. Defendant Betty White resided in the State of California, and assisted with the execution of fraudulent transactions.

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COUNT 1

(Bank Fraud Conspiracy)

4. The grand jury incorporates paragraphs 1 through 3 as if fully set forth herein.

5. From in or about 2006 through in or about March 2011, in the State and District of Minnesota and elsewhere, the defendants,

JULIAN OKEAYAINNEH,  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh,  
OLADIPO SOWUNMI COKER,  
a/k/a Oladipo Sawummi Coker,  
a/k/a Aron Meshan,  
a/k/a Dipo,  
a/k/a Dupo,  
a/k/a Debo,  
a/k/a Depo,  
a/k/a Deepo,  
a/k/a D,  
a/k/a Dee,  
CHARLES AMANKWAH AKUFFO,  
a/k/a Charles Amankwah,  
NANA OSEI-TUTU,  
FATA LEETA SARNOR DAVID,  
OLUGENYA TEMIDAGO ADENIRAN,  
a/k/a Olugbenga Temidayo Adeniran,  
a/k/a Dennis Lok,  
a/k/a Dayo Olugbega,  
a/k/a Andre T. Andeiran,  
a/k/a Andeniran T. Dayo,  
a/k/a Oluwafemi Olarewaju Osibodu,  
a/k/a Dayo,  
a/k/a Dre, and  
BETTY WHITE,  
a/k/a Aunt Betty,  
a/k/a Momma,  
a/k/a Michelle Kaough,

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a/k/a Michelle Linda Kaough,  
a/k/a Betty Moore,  
a/k/a Betty M. Moore,  
a/k/a Betty Marie Moore,  
a/k/a Betty Morrisen,  
a/k/a Betty Morrison,  
a/k/a Elizabeth Walker,  
a/k/a Betty Elizabeth White,  
a/k/a Betty M. White,  
a/k/a Betty Marie White,  
a/k/a Shiana White.  
a/k/a L.H.,

did knowingly combine, conspire, confederate and agree with one or more other defendants and with others known and unknown to the grand jury, to execute and attempt to execute a scheme and artifice to defraud the Financial Institutions, and to obtain and attempt to obtain by means of material false and fraudulent pretenses and representations, monies and funds owned by and under the custody and control of the Financial Institutions, in violation of Title 18, United States Code, Sections 1344 and 1349.

Purpose

6. The purpose of the scheme was to obtain and use means of identification of other persons to create false bank and credit card accounts; to recruit people to assume the identities of other persons and conduct fraudulent transactions at Financial Institutions and businesses; to recruit employees of the Financial Institutions to access bank information and assist with the execution of fraudulent

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transactions; and to obtain money and merchandise through the use of fraudulently obtained bank account information, credit cards and counterfeit checks. Through this scheme the defendants intended to defraud Financial Institutions.

Manner and Means

7. To carry out the conspiracy, the defendants, together with others known and unknown to the grand jury:

a. Fraudulently obtained the means of identification of victims in the State of Minnesota and elsewhere;

b. Opened bank accounts using false or stolen means of identification to fraudulently obtain funds of the victims in the State of Minnesota and elsewhere;

c. Stole checks from businesses in the State of Minnesota and elsewhere;

d. Deposited stolen business checks into fraudulently created bank accounts in the State of Minnesota and elsewhere, and thereafter withdrew the funds;

e. Used victims' means of identification to fraudulently obtain credit card accounts at Financial Institutions in the State of Minnesota and elsewhere;

f. Fraudulently withdrew funds from credit card accounts in the State of Minnesota and elsewhere;



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g. Fraudulently obtained bank account and bank card account information of victims in the State of Minnesota and elsewhere, including information regarding victims' Home Equity Lines of Credit ("HELOC"), which the defendants used to fraudulently transfer funds from the victims' accounts to accounts controlled by the defendants without the victims' knowledge or authorization;

h. Recruited and transported conspirators, in the State of Minnesota and elsewhere, to conduct fraudulent bank transactions, including deposits and withdrawals at Financial Institutions and businesses using victims' means of identification;

i. Recruited Financial Institution employees, in the State of Minnesota and elsewhere, to fraudulently access and obtain customer information and to assist with the execution of fraudulent bank transactions;

j. Through these manner and means, the defendants conspired to obtain and attempted to obtain fraud proceeds through acts committed by the defendants and other conspirators in Minnesota, and elsewhere.

All in violation of Title 18, United States Code, Section 1349.

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COUNTS 2-18  
(Bank Fraud)

8. The grand jury incorporates paragraphs 1 through 7 as if fully set forth herein.

9. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendants, as named below in each count, aided and abetted by each other and by others known and unknown to the grand jury, having devised the scheme and artifice to defraud Financial Institutions, and to obtain and attempt to obtain the monies and funds owned by and under the custody and control of the Financial Institutions, by means of material false and fraudulent pretenses, representations and promises, did knowingly execute and attempt to execute the scheme and artifice as follows:

Count	Defendant(s)	Date (on or about)	Financial Institution	Description
2	DAVID	2/23/06 - 3/14/06	Wells Fargo Bank	Caused the withdrawal in the amount of \$4000 from an account ending in XXXX3171 using the stolen identity of T.J.F.
3	OKEAYAINNEH COKER	06/03/08 - 06/04/08	Anchor Bank	Caused the withdrawals in the total amount of \$12,500 from an account ending in xxxx2923 using the stolen identity of M.F.
4	OKEAYAINNEH COKER AKUFFO	11/17/09	Wells Fargo Bank	Opened bank accounts ending in XXXX7010 and XXXX5854 using the identity of D.B. knowing the true identity of the account holder was not D.B.

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
5	OKEAYAINNEH COKER AKUFFO TUTU	11/19/09	US Bank	Opened bank account in stolen identity of D.B ending in XXXX3692 and M.S. ending in XXX9727 knowing the true identity of the account holders were not D.B. and M.S.
6	ADENIRAN	11/23/09- 11/25/09	Chase Bank	Used Chase Visa Card ending in XXXX3017 in the name of D.G.B. to conduct cash advances in the total amount of \$52,000 and purchase gift cards in the total amount of \$3,012.
7	ADENIRAN	11/25/09- 12/01/09	Chase Bank	Used Chase Visa Card ending in XXXX0960 in the name of B.B. to conduct cash advances in the total amount of \$25,000.
8	OKEAYAINNEH COKER AKUFFO DAVID	12/08/09 - 12/10/09	Wells Fargo Bank	Caused unauthorized wire transfers from S.S. HELOC account in the amounts of \$49,500 into an account ending in XXXX9855 and \$45,000 into an account ending in XXXX9855, and caused the withdrawal of \$19,500 in the form of a cashier's check and cash from the account ending in xxxxx9855.
9	ADENIRAN	12/12/09- 12/14/09	Chase Bank	Used Chase Visa Card ending in XXXX9646 in the name of J.O. to purchase gift cards in the total amount of \$12,656 and attempt cash advances in the total amount of \$10,500.
10	ADENIRAN	12/16/09- 12/18/09	Chase Bank	Used Chase Visa Card ending in XXXX5636 in the name of A.D. to conduct cash advances in the total amount of \$17,500 and gift card purchases in the total amount of \$1,508.
11	OKEAYAINNEH COKER	05/10/10 -	TCF	Deposited altered payee check from Precision Fluids, Inc. dated 4/29/10, for \$19,583 and

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
		05/18/10		caused subsequent withdrawals from an account ending in XXXX8539.
12	TUTU	10/7/10- 10/13/10	US Bank	Attempted to open bank account ending in xxxx0453 with fraudulent documents.
13	OKEAYAINNEH COKER	10/19/10 - 11/03/10	Associated Bank	Deposited altered payee check from White Rose Food, dated 10/7/10, for \$107,018 into account ending in XXXX8223 using stolen identity of J.B. and caused the withdrawals in increments under \$10,000 from accounts ending in XXXX8223 and XXXX1620.
14	OKEAYAINNEH COKER WHITE	11/02/10 - 11/18/10	TCF Bank	Deposited altered Payee check from Ohio Dominican University, dated 10/12/10, for \$37,890 into account ending in XXXX4781 using stolen identity of J.B. and caused the withdrawals in increments under \$10,000 from an account ending in XXXX4781.
15	OKEAYAINNEH COKER WHITE	11/04/10 - 11/23/10	TCF Bank	Deposited altered payee check from Chase Home Finance, dated 10/06/10, for \$23,043 into account ending in XXXX4779 using stolen identity of J.B. and caused the withdrawals in increments under \$10,000 from an account ending in XXXX4779.
16	OKEAYAINNEH COKER WHITE	11/18/10 - 11/23/10	TCF Bank	Deposited altered payee check from State Farm Check, dated 10/20/10, for \$53,437 into account ending in XXXX4780 using stolen identity of J.B. and caused the withdrawals in increments under \$10,000 from an account ending in XXXX4780.
17	OKEAYAINNEH	11/24/10-	Chase Bank	Caused the use of Chase Visa

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
	COKER WHITE	11/30/10		Card ending in XXXX9836 in the name of L.H. to conduct cash advance and POS transactions in the total amount of \$34,000.
18	OKEAYAINNEH COKER WHITE	12/01/10- 12/08/10	Associated Bank	Caused an account to be opened and deposited alerted payee check from International Food Products, dated 11/18/10, for \$124,811, into account ending in XXXX5740 using stolen identity of L.H.

All in violation of Title 18, United States Code, Sections 1344, 1349 and 2.

COUNTS 19-25  
(Mail Fraud)

10. The grand jury incorporates paragraphs 1 through 9 as if fully set forth herein.

11. On or about the date set forth below, in the State and District of Minnesota and elsewhere, the defendants, as named below in each count, aided and abetted by each other and by others known and unknown to the grand jury, having devised the scheme and artifice to defraud Financial Institutions, and to obtain and attempt to obtain the monies and funds owned by and under the custody and control of the Financial Institutions, by means of material false and fraudulent pretenses, representations and promises, did knowingly

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cause to be sent, delivered, and moved by the United States Postal Service and commercial interstate carrier, according to the directions thereon, the items described below:

Count	Defendant (s)	Date (on or about)	Mailings
19	OKEAYAINNEH COKER	3/01/10	Passport photo of A.G.
20	COKER	8/10/10	Replacement American Express card, account ending in xxx2003, in victim name J.T.G.
21	OKEAYAINNEH COKER	10/19/10	Altered payee check from White Rose Food, dated 10/7/10, for \$107,018.
22	OKEAYAINNEH COKER	11/02/10	Altered payee check from Dominican University, dated 10/12/10, for \$37,890.99.
23	OKEAYAINNEH COKER	11/04/10	Altered payee check from Chase Home Finance, dated 10/06/10, for \$23,043.
24	OKEAYAINNEH COKER	11/18/10	Altered payee check from State Farm Check, dated 10/20/10, for \$53,437.
25	OKEAYAINNEH COKER	12/01/10 - 12/08/10	Altered payee check from International Food Products, dated 11/18/10 for \$124,811.

All in violation of Title 18, United States Code, Sections 1341, 1349 and 2.

COUNTS 26-27  
(Wire Fraud)

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12. The grand jury incorporates paragraphs 1 through 11 as if fully set forth herein.

13. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendant,

**JULIAN OKEAYAINNEH,**  
 a/k/a Julian Nosa Inneh,  
 a/k/a Julius Inneh,  
 a/k/a J.J.,  
 a/k/a Julian Okeaya-Inneh,

aiding and abetting and being aided and abetted by others known and unknown to the grand jury, having devised the scheme and artifice to defraud Financial Institutions, and to obtain and attempt to obtain the monies and funds owned by and under the custody and control of the Financial Institutions, by means of material false and fraudulent pretenses, representations and promises, did execute and attempt to execute the scheme and artifice, by knowingly transmitting and causing to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals and sounds, as follows:

Count	Date (on or about)	Financial Institution	Wire
26	11/14/06	US Bank	Wire from California to Minnesota related to using identity of S.K. to deposit a stolen check in the amount of \$66,983, into an account ending in XXX7563.

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Count	Date (on or about)	Financial Institution	Wire
27	09/29/09	US Bank	Wire from California to Minnesota related to using the identity of J.T., to deposit a stolen check in the amount of \$74,430 into an account ending in XXX0271.

All in violation of Title 18, United States Code, Sections 1343, 1349 and 2.

COUNTS 28-39  
(Aggravated Identity Theft)

14. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendants, as named below in each count, aided and abetted by each other and by others known and unknown to the grand jury, did knowingly possess and use, without lawful authority, a means of identification of another person, as alleged in each count below, during and in relation to the commission of a felony violation of Bank Fraud, Mail Fraud and Wire Fraud:

Count	Defendant(s)	Date (on or about)	Financial Institution	Description
28	DAVID	2/22/06- 3/14/06	Wells Fargo Bank	Unauthorized use of means of identification of victim T.J.F., causing the withdrawal of \$4000 from an account ending in XXXX3171 using the stolen identity of T.J.F.
29	OKEAYAINNEH COKER	11/07/09- 12/10/09	Wells Fargo	Unauthorized use of means of identification of victim S.S.,



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Count	Defendant (s)	Date (on or about)	Financial Institution	Description
	AKUFFO DAVID		Bank	causing a withdrawal and cashing of a cashier's check from the account ending in XXXX9855 in the amount of \$19,500.
30	OKEAYAINNEH COKER AKUFFO	11/07/09- 12/22/09	Wells Fargo Bank	Unauthorized use of means of identification of victim D.B., opening bank accounts ending in XXXX7010 and XXXX5854.
31	OKEAYAINNEH COKER AKUFFO TUTU	11/19/09 - 12/14/09	US Bank	Unauthorized use of means of identification of victim M.S., opening account ending in XXXX9727.
32	TUTU	11/19/09 - 12/28/09	US Bank	Unauthorized use of means of identification of victim D.B., opening account ending in XXXX3692.
33	ADENIRAN	11/23/09- 11/25/09	Chase Bank	Unauthorized use of means of identification of victim D.G.B., using Chase Visa Card ending in XXXX3017 to conduct cash advances in the total amount of \$52,000 and purchase gift cards in the total amount of \$3,012.
34	ADENIRAN	11/25/09- 12/01/09	Chase Bank	Unauthorized use of means of identification of victim B.B., using Chase Visa Card ending in XXXX0960 to conduct cash advances in the total amount of \$25,000.
35	ADENIRAN	12/12/09- 12/14/09	Chase Bank	Unauthorized use of means of identification of victim J.O., using Chase Visa Card ending in XXXX9646 to purchase gift cards in the total amount of \$12,656 and attempt cash advances in the total amount of \$10,500.
36	ADENIRAN	12/16/09- 12/18/09	Chase Bank	Unauthorized use of means of identification of victim A.D.,

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
				using Chase Visa Card ending in XXXX5636 to conduct cash advances in the total amount of \$17,500 and gift card purchases in the total amount of \$1,508.
37	COKER	8/10/10	American Express	Unauthorized use of means of identification of victims J.T.G., American Express card, account ending in xxx2003.
38	OKEAYAINNEH COKER	10/29/10- 11/03/10	Associated Bank	Unauthorized use of means of identification of victim J.B., causing the withdrawals from accounts ending in XXXX8223 and XXXX1620.
39	OKEAYAINNEH COKER WHITE	12/01/10	Associated Bank	Unauthorized use of means of identification of victim L.H., opening account ending in XXXX5740.

All in violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT 40**  
(Money Laundering Conspiracy)

15. From in or about 2006 through in or about March 2011, in the State and District of Minnesota and elsewhere, the defendants,

JULIAN OKEAYAINNEH,  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh, and  
OLADIPO SOWUNMI COKER,  
a/k/a Oladipo Sawummi Coker,  
a/k/a Aron Meshan,  
a/k/a Dipo,

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a/k/a Dupo,  
a/k/a Debo,  
a/k/a Depo,  
a/k/a Deepo,  
a/k/a D,  
a/k/a Dee,

did knowingly combine, conspire, confederate and agree with each other and with others known and unknown to the grand jury, to conduct and attempt to conduct financial transactions affecting interstate commerce, namely transfers of funds, which transactions involved proceeds of specified unlawful activity, that is, bank fraud, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity and knowing that the transactions were designed in whole and in part (a) to conceal and disguise the nature, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and (b) to avoid a transaction recording requirement under State or Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 41

(Trafficking in False Authentication Features)

16. From in or about 2006, through in or about December 17, 2010, in the State and District of Minnesota and elsewhere, the

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defendant,

JULIAN OKEAYAINNEH,  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh,

aiding and abetting and being aided and abetted by others known and unknown to the grand jury, did knowingly traffic in false and actual authentication features for use in false authentication documents, document-making implements and means of identification, in and affecting interstate commerce, without lawful authority, to wit, a means of identification of another person; all in violation of Title 18, United States Code, Sections 1028(a)(8); 1028(b)(1); and 2.

FORFEITURE ALLEGATIONS

19. All counts of this Second Superseding Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures.

20. If convicted of any of Counts 1 through 18 of this Second Superseding Indictment, each defendant charged by each count of conviction shall forfeit to the United States, pursuant to Title 18, United States code, Section 982(a)(2), any and all property, real or personal, constituting or derived from proceeds such defendant(s) obtained, directly or indirectly, as a result of the offense(s) of

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conviction, including but not limited to:

- a. eight (8) Apple iPads, serial numbers GB040MLUETV, J3034HQAETV, J3038KUPETV, GB039H7YZ3A, B039KENZ3A, B039OFOA90, V5038ZETETV, and G B040R8TETV;
- b. six (6) Dell Inspiron Laptops, serial numbers 4GHH9N1, G5PT7N1, G8CH9N1, CSKT7N1, J2BLDL1, and JMQR8L1;
- c. two (2) Acer Aspire Laptops, serial numbers LXPY90200101907F472000, and XPY9020010221EDA62000;
- d. MacBook Air Apple Laptop, serial number W8811J3MY51;
- e. HP Pavilion Desktop and Monitor, serial number MXX0270LK9;
- f. two (2) HP DeskJet F4580 Printers, serial numbers CN074C71W7, and CN981BQ217;
- g. Toshiba Laptop, serial number 2100512200176;
- h. two (2) Sony Vaio Laptops, serial numbers 54032350300100, and 329502361;
- i. two (2) HP Pavilion Notebooks, serial numbers CNF9429BDR, and CNF0265TNQ;
- j. HP Mini 210, serial number CNF00411G4;
- k. two (2) HP Notebooks, serial numbers CNF02179GK, and CNF0297Q5B;
- l. HP Touch Smart PC, serial number 3CR93911CW;
- m. Bose Wave Radio, serial number 034037C73475470AC;
- n. Panasonic Cordless Phone System;
- o. two (2) Rigid 8000 Watt Portable Generators, serial numbers CHM3600059, and CHM3600058;

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- p. \$80,196.79 in funds seized from Wells Fargo Bank Account # 5359277224;
- q. \$2,902.00 in U.S. currency;
- r. \$10,023.00 in U.S. currency;
- s. \$520.00 in U.S. currency; and
- t. \$1,417.25 in U.S. currency.

If convicted of any of Counts 19 through 27, each defendant listed in each count of conviction shall forfeit, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived, directly or indirectly, from proceeds traceable to the offense(s) of conviction.

If convicted of Count 40, each convicted defendant charged by Count 39 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real or personal, involved in such offense and/or any property traceable to such property, including but not limited to:

- p. \$80,196.79 in funds seized from Wells Fargo Bank Account # 5359277224.

If convicted of Count 41, defendant Julian Okeayainneh shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting or derived

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from proceeds the person obtained directly or indirectly as a result of the offense of conviction, and shall forfeit, pursuant to Title 18, United States Code, Section 1028(b) any personal property used or intended to be used to commit the offense, including but not limited to:

- a. eight (8) Apple iPads, serial numbers GB040MLUETV, J3034HQAETV, J3038KUPETV, GB039H7YZ3A, B039KENZ3A, B039OFOA90, V5038ZETETV, and G B040R8TETV;
- b. six (6) Dell Inspiron Laptops, serial numbers 4GHH9N1, G5PT7N1, G8CH9N1, CSKT7N1, J2BLDL1, and JMQR8L1;
- c. two (2) Acer Aspire Laptops, serial numbers LXPY90200101907F472000, and XPY9020010221EDA62000;
- d. MacBook Air Apple Laptop, serial number W8811J3MY51;
- e. HP Pavilion Desktop and Monitor, serial number MXX0270LK9;
- f. two (2) HP DeskJet F4580 Printers, serial numbers CN074C71W7, and CN981BQ217;
- g. Toshiba Laptop, serial number 2100512200176;
- h. two (2) Sony Vaio Laptops, serial numbers 54032350300100, and 329502361;
- i. two (2) HP Pavilion Notebooks, serial numbers CNF9429BDR, and CNF0265TNQ;
- j. HP Mini 210, serial number CNF00411G4;
- k. two (2) HP Notebooks, serial numbers CNF02179GK, and CNF0297Q5B;
- l. HP Touch Smart PC, serial number 3CR93911CW;

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- m. Bose Wave Radio, serial number 034037C73475470AC;
- n. Panasonic Cordless Phone System;
- o. two (2) Rigid 8000 Watt Portable Generators, serial numbers CHM3600059, and CHM3600058;
- p. \$80,196.79 in funds seized from Wells Fargo Bank Account # 5359277224;
- q. \$2,902.00 in U.S. currency; and
- u. 2010 E550 Mercedes with VIN: WDDKJ7CB1AF004641.

If any of the property described above is not available for forfeiture as defined by Title 21, United States Code, Section 853(p)(1), the United States intends to seek the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p)(2) and Title 28, United States Code, Section 2461(c), including but not limited those assets specifically listed above as items a through u.

A TRUE BILL:

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UNITED STATES ATTORNEY

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FOREPERSON