

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

U.S. DISTRICT COURT

2011 FEB 10 P 12: 31

UNITED STATES OF AMERICA	:	Hon.
v.	:	Crim. No. 11-
TAIWO DAISI	:	18 U.S.C. § 286

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:
 - A. Defendant Taiwo Daisi was a resident of Union County, New Jersey.
 - B. Co-conspirator A.A. was a resident of Burlington County, New Jersey.
 - C. Co-conspirator A.S., a/k/a "K.S.," was a resident of Essex County, New Jersey and Somerset County, New Jersey.
 - D. Co-conspirator J.C., a/k/a "A.T.," was a resident of Middlesex County, New Jersey.
2. From at least as early as in or about January 2005 through in or about October 2009, in the District of New Jersey, and elsewhere, defendant

TAIWO DAISI

did knowingly and intentionally enter into an agreement, combination, and conspiracy with A.A., A.S., J.C., and others to defraud the United States and a department or agency thereof, namely the United States Department of the Treasury, Internal Revenue Service, by obtaining and aiding

to obtain the payment and allowance of false, fictitious, and fraudulent claims, namely individual income tax refund checks.

Object of the Conspiracy

3. The object of the conspiracy was for defendant DAISI and his co-conspirators to obtain and ultimately cash income tax refund checks that were generated through the filing of materially false and fraudulent individual income tax returns with the Internal Revenue Service (“IRS”), and to use the resulting illicit cash proceeds – millions of dollars in total – for their personal benefit.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that beginning at least as early as in or about January 2005, defendant DAISI, co-conspirator A.A., co-conspirator A.S., co-conspirator J.C., and others would purchase the personal identifying information of hundreds of victims of identity theft (collectively, the “I.D. Theft Victims”), including their names, dates of birth, and Social Security numbers.

5. It was further part of the conspiracy that, thereafter, defendant DAISI, co-conspirator A.A., co-conspirator A.S., co-conspirator J.C., and others would use the personal information of the I.D. Theft Victims to create and file materially false and fraudulent individual income tax returns with the IRS in the names of the I.D. Theft Victims (collectively, the “Tax Returns”). Defendant DAISI’s and his co-conspirators’ objective in doing so was to generate false and fraudulent income tax refund checks issued by the United States Department of the Treasury (collectively, the “Tax Refund Checks”).

6. It was further part of the conspiracy that, although defendant DAISI, co-

conspirator A.A., co-conspirator A.S., co-conspirator J.C., and others used the personal information of the I.D. Theft Victims in creating and filing the Tax Returns, they did not use the home addresses of the I.D. Theft Victims. Rather, defendant DAISI and his co-conspirators used their own home addresses or addresses controlled by them on the Tax Returns. Defendant DAISI and his co-conspirators did this so that the Tax Refund Checks would be directed to them. In total, defendant DAISI and his co-conspirators used approximately 41 separate addresses controlled by them in filing the Tax Returns.

7. It was further part of the conspiracy that upon the filing of the Tax Returns by defendant DAISI, co-conspirator A.A., co-conspirator A.S., co-conspirator J.C., and others, with the IRS, the IRS generally issued Tax Refund Checks.

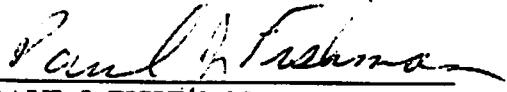
8. It was further part of the conspiracy that defendant DAISI, co-conspirator A.A., co-conspirator A.S., co-conspirator J.C., and others would deposit the resulting Tax Refund Checks into approximately 24 separate bank accounts controlled by them or their co-conspirators (collectively, the "Bank Accounts").

9. It was further part of the conspiracy that defendant DAISI, co-conspirator A.A., co-conspirator A.S., co-conspirator J.C., and others would then make cash withdrawals from the Bank Accounts or, alternatively, direct monies from the Bank Accounts into other bank accounts controlled by them.

10. It was further part of the conspiracy that, in total, between in or about January 2005 through in or about October 2009, defendant DAISI, co-conspirator A.A., co-conspirator A.S., co-conspirator J.C., and others filed thousands of Tax Returns that, combined, sought nearly \$11.5 million in Tax Refund Checks.

11. It was further part of the conspiracy that as a result of the filing of the Tax Returns by defendant DAISI, co-conspirator A.A., co-conspirator A.S., co-conspirator J.C., and others, the IRS actually released approximately \$3.2 million in Tax Refund Checks to defendant DAISI and his co-conspirators.

All in violation of Title 18, United States Code, Section 286.


PAUL J. FISHMAN
United States Attorney

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INFORMATION FOR

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**PAUL J. FISHMAN
U.S. ATTORNEY
NEWARK, NEW JERSEY**

**LEE VARTAN
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
(973) 645-2762**

U.S. DISTRICT COURT

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