

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

UNITED STATES OF AMERICA

v.

SEALED
INDICTMENT

4:05cr24-SPM

ADEDEJI ADENIRAN,
a/k/a Tony
a/k/a Aare
STEPHEN O. ADETONA,
a/k/a Taju
ADEYINKA OLUSHOLA CHEESE,
a/k/a Adeyinka Sanusi Cheese
DAPHNEE PHILIAS,
MONSURAT SOLA ADEBANJO,
a/k/a Monsurat Sola White
ANTHONY GOLDMAN,
FATAI TAIWO,
a/k/a Asa
and
AREMU ODUNBAKU,
a/k/a Adeyemi O. Ajibose
a/k/a Yemi Agibose
a/k/a Sir Yemi
a/k/a Baba Toro

THE GRAND JURY CHARGES:

COUNT ONE

Introduction

That at all times material to this Indictment:

1. Florida State University Credit Union was a financial institution, the deposits of which were insured by the National Credit Union Administration (NCUA)

2. Florida Commerce Credit Union was a financial institution, the deposits of which were insured by the NCUA.

OFFICE OF CLERK
U.S. DISTRICT CT
NORTHERN DIST. FLA.
TALLAHASSEE, FLA.

05 MAY -3 PM 2:46

FILED

3. Envision Credit Union was a financial institution, the deposits of which were insured by the NCUA.
4. Sunshine State Federal Credit Union was a financial institution, the deposits of which were insured by the NCUA.
5. Bank of America was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC).
6. Allstate Bank was a financial institution, the deposits of which were insured by the FDIC.

The Offense

7. During and between on or about August 13, 2002, and on or about May 17, 2004, in the Northern District of Florida, and elsewhere, the defendants,

ADEDEJI ADENIRAN,
a/k/a Tony
a/k/a Aare
STEPHEN O. ADETONA,
a/k/a Taju
ADEYINKA OLUSHOLA CHEESE
a/k/a Adeyinka Sanusi Cheese
DAPHNEE PHILIAS,
MONSURAT SOLA ADEBANJO,
a/k/a Monsurat Sola White
ANTHONY GOLDMAN,
FATAI TAIWO,
a/k/a Asa
and
AREMU ODUNBAKU,
a/k/a Adeyemi O. Ajibose
a/k/a Yemi Agibose
a/k/a Sir Yemi
a/k/a Baba Toro,

did knowingly and willfully combine, conspire, confederate and agree with each other and with other persons, both known and unknown to the Grand Jury, to commit offenses against the United States of America, that is,

a. to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud and to obtain money, funds, credits and other property owned by and under the custody and control of federally-insured financial institutions, by means of materially false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344; and

b. to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises by mailing, and causing to be delivered by the United States Postal Service and private and commercial interstate carriers, some mail matter, for the purpose of executing the scheme and artifice, in violation of Title 18, United States Code, Section 1341.

c. to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises by transmitting and causing to be transmitted by wire in interstate commerce some communication for the purpose of executing the scheme and artifice, in violation of Title 18, United States Code, Section 1343.

Manner and Means

8. It was a part of the conspiracy that the conspirators would and did obtain identity information of individuals, that is, names, dates of birth, and social security numbers, and would use the identities of individuals, with their identifying information, to fraudulently open

accounts at financial institutions obtain bank debit, credit cards, and checks in the names of the individuals without the individuals' knowledge or consent.

9. It was further part of the conspiracy that the conspirators would and did submit applications to financial institutions to open bank accounts and obtain bank debit and credit cards in the names of other individuals by mail and private commercial carrier, facsimile, and by computer.

10. It was further part of the conspiracy that the conspirators would and did deposit, and caused to be deposited, fraudulent and counterfeit cashier and bank checks, business checks, personal checks, money orders, and wire transfers into the fraudulently opened bank accounts for subsequent withdrawal.

11. It was further part of the conspiracy that the conspirators would and did utilize various mailboxes and addresses to receive bank debit and credit cards, checks, and other account items from financial institutions after the accounts were fraudulently opened.

12. It was further part of the conspiracy that the conspirators would and did cause the financial institutions to mail debit and credit cards, credit convenience checks, monthly statements, and other correspondence to the conspirators in the names of other individuals at addresses designated by the conspirators.

13. It was further part of the conspiracy that the conspirators would and did withdraw, and attempt to withdraw, monies from the fraudulent accounts with bank debit cards, and did cause and attempt to cause various amounts of money to be wired to other accounts located within and without the United States.

14. It was further part of the conspiracy that the conspirators would and did utilize the fraudulently obtained debit and credit cards to obtains goods and services from various merchants and businesses.

15. It was further part of the conspiracy that the conspirators would and did forge and counterfeit checks of various business organizations and individuals and use these forged and counterfeited checks to deposit into accounts fraudulently opened by the conspirators for subsequent withdrawal or transfer.

16. It was further part of the conspiracy that the conspirators would and did possess and use certain equipment and materials to create fraudulent identity cards and documents in the names of other individuals.

17. It was further part of the conspiracy that the conspirators would and did possess false identity documents and materials to assist the conspirators in executing the scheme to defraud financial institutions

18. It was further part of said conspiracy that some of the conspirators would and did make inquiries with financial institutions concerning such accounts to determine whether and when cash withdrawals and wire transfers could be made against the counterfeit checks and money orders, and stolen and altered money orders, deposited and wired into the accounts.

19. It was further part of the conspiracy that some of the conspirators would and did direct the other conspirators to make withdrawals from the accounts into which the counterfeit checks and money orders, and stolen and altered money orders, had been deposited as soon as funds could be withdrawn.

20. It was further part of the conspiracy that the conspirators obtained and attempted to obtain from various financial institutions approximately \$4,100,000.00.

21. It was further part of the conspiracy that the conspirators would and did perform acts and make statements to hide and conceal, and cause to be hidden and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

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

COUNTS TWO THROUGH TWENTY-SEVEN

Introduction

22. The allegations contained in paragraphs 1 through 6 of this Indictment are hereby realleged and incorporated herein by reference.

The Scheme To Defraud

23. During and between on or about August 13, 2002, and on or about May 17, 2004, in the Northern District of Florida, the defendants,

ADEDEJI ADENIRAN,
a/k/a Tony
a/k/a Aare
STEPHEN O. ADETONA,
a/k/a Taju
DAPHNEE PHILIAS,
and
ANTHONY GOLDMAN,

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud and to obtain money, funds, credits and other property owned by and under the custody and control of federally-insured financial institutions, by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means

24. The allegations contained in paragraphs 8 through 21 of this Indictment are hereby realleged and incorporated herein by reference.

Execution of the Scheme

25. On or about the dates set forth in the table below, for the purpose of executing and attempting to execute the aforementioned scheme to defraud, the defendants named below did commit the described below acts involving the following federally insured financial institutions:

COUNT	DEFENDANT	DATE	ACTIVITY	INSTITUTION
TWO	ADENIRAN	09/11/2002	Deposit of \$46,500 check	FSU Credit Union
THREE	ADENIRAN	09/30/2002	Attempted wire of \$39,600	FSU Credit Union
FOUR	ADENIRAN	10/04/ 2002	Deposit of \$29,000 check	FSU Credit Union
FIVE	ADENIRAN	12/09/2002	Deposit of \$6,800 check	Envision Credit Union
SIX	ADENIRAN	12/30/2002	Deposit of \$134,371 check	Envision Credit Union
SEVEN	ADENIRAN	01/13/ 2003	Deposit of \$40,789 check	Florida Commerce Credit Union
EIGHT	ADENIRAN	01/21/ 2003	Attempted wire of \$29,750	Florida Commerce Credit Union
NINE	ADENIRAN	01/21/2003	Change of Address Request	Florida Commerce Credit Union
TEN	ADENIRAN ADETONA	03/10/2003	Deposit of \$7,400 check	Florida Commerce Credit Union
ELEVEN	ADENIRAN	03/17/2003	Deposit of \$135,232 Check	FSU Credit Union
TWELVE	ADENIRAN	04/14/2003	Deposit of \$195,000 check	FSU Credit Union
THIRTEEN	ADENIRAN	05/20/2003	Deposit of \$6,950 check	Florida Commerce Credit Union
FOURTEEN	ADENIRAN	06/27/2003	Wire Transfer of \$10,000	Florida Commerce Credit Union
FIFTEEN	ADENIRAN	07/02/2003	Wire Transfer of \$8,000	Florida Commerce Credit Union

SIXTEEN	ADENIRAN	07/07-08/2003	Attempted Wire of \$8,000	Florida Commerce Credit Union
SEVENTEEN	ADENIRAN	07/15/2003	Facsimile of address change	Florida Commerce Credit Union
EIGHTEEN	ADETONA	08/17/2003	Request for wire instructions	Florida Commerce Credit Union
NINETEEN	ADENIRAN	09/03/2003	Attempted wire of \$5,000	Florida Commerce Credit Union
TWENTY	ADENIRAN	09/04/2003	Attempted wire of \$26,900	Florida Commerce Credit Union
TWENTY-ONE	ADENIRAN	11/04/2003	Attempted wire of \$21,000	Florida Commerce Credit Union
TWENTY-TWO	ADETONA	12/09/2003	Open bank account	Florida Commerce Credit Union
TWENTY-THREE	ADETONA	12/14/2003	Deposit of \$8,500 check	Florida Commerce Credit Union
TWENTY-FOUR	ADETONA	12/24/2003	Request for checks	Florida Commerce Credit Union
TWENTY-FIVE	ADETONA GOLDMAN	12/29/2003	Attempted wire of \$6,825	Florida Commerce Credit Union
TWENTY-SIX	ADETONA GOLDMAN	12/30/2003	Attempted wire of \$6,825	Florida Commerce Credit Union
TWENTY-SEVEN	ADETONA PHILIAS	01/08/2004	Attempted wire of \$1,200	Florida Commerce Credit Union

In violation of Title 18, United States Code, Sections 1344 and 2.

FORFEITURES

The allegations contained in Counts One through Twenty-Seven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(2).

From their engagement in any or all of the violations alleged in Counts One through Twenty-Seven of this Indictment, the defendants,

ADEDEJI ADENIRAN,
a/k/a Tony
a/k/a Aare
STEPHEN O. ADETONA,
a/k/a Taju
ADEYINKA OLUSHOLA CHEESE
a/k/a Adeyinka Sanusi Cheese
DAPHNEE PHILIAS,
MONSURAT SOLA ADEBANJO,
a/k/a Monsurat Sola White
ANTHONY GOLDMAN,
FATAI TAIWO,
a/k/a Asa
and
AREMU ODUNBAKU,
a/k/a Adeyemi O. Ajibose
a/k/a Yemi Agibose
a/k/a Sir Yemi
a/k/a Baba Toro,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2) any and all of the defendants' right, title and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offenses.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendants:

1. cannot be located upon the exercise of due diligence;
2. has been transferred, sold to, or deposited with a third party;
3. has been placed beyond the jurisdiction of this Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

A TRUE BILL:

~~REDACTED~~


FOREPERSON

05/03/05

DATE



GREGORY R. MILLER
United States Attorney



STEPHEN M. KUNZ
Assistant United States Attorney