

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,”
OLANIYI ADELEYE OGUNGBAIYE,
also known as “DonChiChi” and
“Donchichivirus,”
BABATUNDE LADEHINDE LABIYI,
also known as “Junior,” “Dave Beckham
Smith,” “Beckham Smith Dave,” “Chattman
Ronald Stewart,” “George Patrick Thomas,”
“Chris Thompson,” and “James Cole,”
BARNABAS OGHENERUKEVWE EDJIEH,
also known as “Gary Jimmie Stephen” and
“Clifford Spencer,”
SULTAN OMOGBADEBO ANIFOWOSHE,
also known as “Ayinde,” “Samuel
Christopher Giles,” and “Johnson Maxwell,”
BABATUNDE IBRAHEEM AKARIGIDI,
also known as “AK” and “Charles Mark,”
ADEWALE ANTHONY ADEWUMI,
also known as “Johnson Collins,” and
“Adrian Scott,”
MIRACLE AYOKUNLE OKUNOLA,
also known as “Luke Johnson,” “Abraham
Tom,” “Jacob Zack,” and “Johnson
Maxwell,”
OLUROTIMI AKITUNDE IDOWU,
also known as “Idol,” “Roy Frederick
Benson,” “Norman I. Williams,” “Marcus
Smith,” “Andred Marcus Smith,” “Christ C.
Cooper,” and
OLANIYI NASIRU OJIKUTU

Case No. 18 CR 818

Violations: Title 18, United
States Code, Sections 1014,
1030(b), 1341, 1343, and 1543

INDICTMENT

COUNT ONE

The SPECIAL JULY 2018 GRAND JURY charges:

1. At times material to this indictment:
 - a. DANIEL SAMUEL ETA (“ETA”) resided in Chicago and Skokie, Illinois;
 - b. OLANIYI ADELEYE OGUNGBAIYE (“OGUNGBAIYE”) resided in Lagos, Nigeria;
 - c. BABATUNDE LADEHINDE LABIYI (“LABIYI”), BARNABAS OGHENERUKEVWE EDJIEH (“EDJIEH”), SULTAN OMOGBADEBO ANIFOWOSHE (“ANIFOWOSHE”), BABATUNDE IBRAHEEM AKARIGIDI (“AKARIGIDI”), MIRACLE AYOKUNLE OKUNOLA (“OKUNOLA”), OLUROTIMI AKITUNDE IDOWU (“IDOWU”), and OLANIYI NASIRU OJIKUTU (“OJIKUTU”) resided in Chicago, Illinois; and
 - d. ADEWALE ANTHONY ADEWUMI (“ADEWUMI”) resided in Dallas, Texas.
2. Beginning no later than in or around 2016, and continuing until in or around December 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,”

OLANIYI ADELEYE OGUNGBAIYE,
also known as “DonChiChi” and “Donchichivirus,”

BABATUNDE LADEHINDE LABIYI,
also known as “Junior,” “Dave Beckham Smith,” “Beckham Smith Dave,”
“Chattman Ronald Stewart,” “George Patrick Thomas,” “Chris Thompson,” and
“James Cole,”

BARNABAS OGHENERUKEVWE EDJIEH,
also known as “Gary Jimmie Stephen” and “Clifford Spencer,”

SULTAN OMOGBADEBO ANIFOWOSHE,
also known as “Ayinde,” “Samuel Christopher Giles,” and “Johnson Maxwell,”

BABATUNDE IBRAHEEM AKARIGIDI,
also known as “AK” and “Charles Mark,”

ADEWALE ANTHONY ADEWUMI,
also known as “Johnson Collins,” and “Adrian Scott,”

MIRACLE AYOKUNLE OKUNOLA,
also known as “Luke Johnson,” “Abraham Tom,” “Jacob Zack,” and “Johnson
Maxwell,”

OLUROTIMI AKITUNDE IDOWU,
also known as “Idol,” “Roy Frederick Benson,” “Norman I. Williams,” “Marcus
Smith,” “Andred Marcus Smith,” and “Christ C. Cooper,” and

OLANIYI NASIRU OJIKUTU,

defendants herein, and others known and unknown, knowingly devised, intended to
devise, and participated in a scheme to defraud individuals and organizations, and to
obtain money and property by means of materially false and fraudulent pretenses,
representations, promises, which scheme is further described as follows.

3. It was part of the scheme that ETA, OGUNGBAIYE, and other co-
schemers lied and caused others to lie to individuals and entities in the United States
in order to obtain money from the victims, including by participating in the following
internet scams, which are described in greater detail below: (1) a mystery shopper
fraud scam; (2) a romance fraud scam; (3) a business email compromise scam; and

(4) an employment fraud scam. To further the scheme and conceal their involvement in the scheme, ETA, OGUNGBAIYE, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, OJIKUTU, and others, obtained and caused others to obtain fraudulent passports, used the fraudulent passports and false information about their identities to open bank accounts in fake names, provided false information to banks to maintain their bank accounts, and caused internet scam victims to transfer money to these bank accounts.

Types of Internet Scams

4. It was part of the scheme that ETA, OGUNGBAIYE, and Co-Schemer L.M. directed, and participated in, internet scams by communicating on the internet with victims and with other co-schemers living in the United States and Nigeria. The internet scams conducted by defendants and their co-schemers included the following types of scams:

a. A mystery shopper fraud scam was a scheme to defraud operated through the mail, email, and electronic messaging applications, targeting victims to be work-from-home “mystery shoppers” in which the targeted victims receive mystery shopper letters explaining the “job” of the mystery shopper and financial instruments, such as money orders or checks. The co-schemers instructed victims to use the proceeds of such instruments to evaluate certain money transmission services, by sending money through services such as Western Union and Money Gram. The co-schemer instructed victims to deposit checks or money orders into the victims’ own personal bank accounts, then, within approximately one or two days, withdraw cash

from their bank account and purchase money orders, or wire the funds to the intended recipient in the mystery shopper letter. The co-schemers falsely informed the victims that this practice was a legitimate employment opportunity. In reality, the money orders or checks sent to the victims by co-schemers were typically either counterfeit or the proceeds of another fraud scheme. Once the victim's bank was notified of the fraudulent deposits, the victim's bank either absorbed the loss or required the victim to make the bank whole by repaying the money withdrawn from the account.

b. A romance fraud scam was a scheme to defraud a victim on the internet, in which co-schemers contacted a victim online and built trust through a purported online romance. Eventually, the co-schemer requested financial assistance for various purposes. In some cases, the co-schemer falsely represented that the victim will either get paid back in the future or that the money being sent was part of a business transaction.

c. A business email compromise scam was a scheme to defraud that typically targeted businesses that regularly perform wire transfer payments. The co-schemers compromised legitimate business email accounts through social engineering or computer intrusion techniques to defraud the victim into transferring funds. Co-schemers fraudulently obtained email credentials, including username and password combinations, and/or "spoofed" email messages to contact victims. Co-schemers appeared to be business contacts (such as contractors or vendors), instructing a victim to pay a charge or invoice into a specific bank account which, unbeknownst to the victim, was actually controlled by the schemers.

d. An employment fraud scam was a scheme where a co-schemer contacted a victim online about a business opportunity. The co-schemers convinced the victim to send money to a predetermined recipient under the false pretense that the money being sent is part of a business transaction, turning the victim into an unwitting money mule because the funds were being funneled through the victim's account.

Examples of Internet Scam Victims

5. It was further part of the scheme that ETA and OGUNGBAIYE communicated with each other and co-schemers about the "mystery shopper" instructions to fraudulently induce victims to be mystery shoppers. ETA, OGUNGBAIYE, and other co-schemers used email accounts and other messaging services to communicate with mystery shopper victims to fraudulently induce them to make Western Union, Money Gram, or other wire transfers to co-schemers who would receive the money at Western Union, Money Gram, or other currency exchange locations under the direction of ETA.

a. For example, co-schemers, using gregmoore2424@gmail.com, sent Victim D an email in September 2017 with a mystery shopper letter. The email instructed Victim D to deposit two checks that Victim D received, perform the mystery shopper duties, and then wire the remaining funds to Individual S.C. via Western Union. As instructed by co-schemers, Victim D deposited the checks into Victim D's bank account. Victim D then withdrew cash, performed Victim D's mystery shopper duties, and then wired the remaining funds through Western Union, before

being notified by Victim D's bank that the checks that Victim D received and deposited in Victim D account were fraudulent.

6. It was further part of the scheme that OGUNGBAIYE and Co-Schemer L.M. used email extractor tools to collect email addresses of potential business email compromise scam victims. OGUNGBAIYE and Co-Schemer L.M. then emailed malicious links to potential internet scam victims to fraudulently induce them into entering their email passwords. Once the passwords were sent, they were routed to OGUNGBAIYE and Co-Schemer L.M.'s email accounts, which would allow them to log into the victim's email account and look for an opportunity to carry out a business email compromise scam.

a. For example, on or about November 13, 2017, OGUNGBAIYE received the password for an account used by Victim G, a homeowners association in Illinois. On or about November 16, 2017, Victim G received an invoice by email from one of its service companies ("Company H"). On or about November 17, 2017, co-schemers sent Victim G an email from an account in the name of Co-Schemer L.M. The email falsely purported to be from Company H and requested that payment for the November 16, 2017 invoice be wired to a bank account rather than sent by check. Co-schemers sent Victim G bank information for an account that IDOWU opened as part of the scheme, and, relying on this fraudulent information, Victim G paid the invoiced amount into that account.

7. It was further part of the scheme that co-schemers conducted internet scams to induce victims to transfer money into bank accounts controlled by ETA,

under the direction and supervision of ETA, OGUNGBAIYE, and other co-schemers.

For example:

a. In or around October 2017, co-schemers using the name “Frank” contacted Victim L through Facebook and convinced Victim L that Victim L and “Frank” were in a romantic relationship. After communicating online, “Frank” falsely represented to Victim L that he would join Victim L in the United States for a future together, and asked Victim L to send money to help pay for his son’s medical bills. Relying on these false representations, Victim L sent money via bank wire transfers to a bank account that ANIFOWOSHE opened as part of the scheme.

b. In or around September 2017, co-schemers using the name “Sarah Allison” contacted Victim K on Instagram. “Sarah Allison” told Victim K that she lived in London, England and was looking for a friend. After developing trust with Victim K, “Sarah Allison” falsely told Victim K that she had received a \$2.5 million inheritance, but needed financial help to get the money released. After Victim K agreed to help, co-schemers directed him to wire money to bank accounts. Relying on these false representations, Victim K wired \$15,000 to a bank account that LABIYI opened as part of the scheme.

c. In or around April 2017, co-schemers contacted Victim P on a dating website using the name “George Bobby Edwards” to establish a romantic relationship. After building trust with Victim P, “George Bobby Edwards” falsely told Victim P that he needed to pay off some debt, and asked for Victim P’s help. After

Victim P agreed to help, co-schemers directed Victim P to send money to a bank account that ADEWUMI opened as part of the scheme.

d. In or around July 2017 co-schemers using the name “Boris Epshtey” contacted Victim S on Facebook. “Boris Epshtey” told Victim S that he was working in the oil business in Turkey. After developing trust with Victim S, “Boris Epshtey” falsely told Victim S and that he needed money for business and legal expenses, and directed Victim S to send money to bank accounts. Relying on these false representations, Victim S sent money to bank accounts that EDJIEH and OJIKUTU opened as part of the scheme.

e. In or around May 2018, co-schemers using the name “General Roy Grene” contacted Victim T on Facebook, falsely claiming to be a member of the United Nations Peacekeeping Forces in Kabul, Afghanistan. “General Roy Grene” asked Victim T to wire \$13,060 to an “Adrian Scott” so that an individual in the United Kingdom could send Victim T the life savings of a United States serviceman. Relying on this false representation, Victim T wired \$13,060 to a bank account that ADEWUMI opened as part of the scheme.

f. In or around June 2017, co-schemers using the name “L. Johnson,” contacted Victim Q on LinkedIn. “L. Johnson” falsely claimed that he was employed with a company called Fortune Finance and that he had funds to invest in Victim Q’s enhanced oil recovery project. “L. Johnson” falsely claimed that he needed help accessing his funds, which were “tied up.” In July 2017, relying on these false representations, Victim Q agreed to help “L. Johnson” access his funds by wiring

\$2,984 from Victim Q's bank account to an account that OKUNOLA opened as part of the scheme.

g. In or around June 2018, co-schemers contacted Victim N online using the name "Jackson Walker" and asked him to work at an online company called Noblon LLC as an accounts payable clerk, falsely telling him that he would be handling payments to Noblon LLC's vendors. After Victim N agreed, co-schemers deposited money into Victim N's bank accounts, and asked him to withdraw the money as cash, checks or money orders, and deposit the money into various bank accounts, purportedly to pay vendors. Relying on these false representations, Victim N deposited money into a bank account that AKARIGIDI opened as part of the scheme.

The Bank Accounts

8. It was part of the scheme that ETA, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, and others, obtained fraudulent passports for the purpose of opening bank accounts to receive money from internet scam victims.

9. It was further part of the scheme that LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, and others, opened bank accounts in the Northern District of Illinois and elsewhere using false names, fraudulent passports, and other fraudulent documents. After opening the bank accounts, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA,

IDOWU, and others, supplied account information from those bank accounts to ETA and others.

10. It was further part of the scheme that OJIKUTU maintained multiple bank accounts in his own name and the business name “Jiks Procurement and Global Services” for the purpose of receiving internet scam victims’ funds.

11. It was further part of the scheme that ETA, OGUNBAIYE, and others caused internet scam victims to deposit their money into bank accounts opened by LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, OJIKUTU, and others, through the use of internet scams. ETA communicated with LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, OJIKUTU, and others, about money from internet scam victims coming into the accounts.

The Proceeds of the Scams

12. In furtherance of the scheme, ETA, OGUNGBAIYE, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, OJIKUTU, and other co-schemers received millions of dollars from internet scam victims in dozens of bank accounts. ETA, OGUNGBAIYE, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, OJIKUTU, and others, subsequently withdrew or caused the withdrawal of the money received in those accounts in cash, cashier’s checks, money orders, or through electronic transfers.

13. It was further part of the scheme that ETA, OGUNGBAIYE, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU,

OJIKUTU, and others, shared the proceeds of the internet scams for their own use and benefit.

14. It was further part of the scheme that ETA, LABIYI, OJIKUTU and others used money from internet scam victims to purchase vehicles from auto auctions in the Northern District of Illinois and elsewhere. ETA and OGUNGBAIYE arranged for the shipment and resale of the vehicles in Nigeria.

15. It was further part of the scheme that ETA, OGUNGBAIYE, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, OJIKUTU, and others, misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, acts done in furtherance of the scheme and the purpose of those acts.

16. On or about September 23, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,”

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an electronic communication to Victim D in New York, in furtherance of a mystery shopper scam that requested payment from Victim D via Western Union;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about December 28, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

BABATUNDE LADEHINDE LABIYI,
also known as “Junior,” “Dave Beckham Smith,” “Beckham Smith Dave,”
“Chattman Ronald Stewart,” “George Patrick Thomas,” “Chris Thompson,” and
“James Cole,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$15,000 wire transfer from Victim K to a Citibank bank account opened in the name of “Chattman Ronald Stewart” in the Northern District of Illinois;

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

COUNT THREE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about October 6, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

BARNABAS OGHENERUKEVWE EDJIEH,
also known as “Gary Jimmie Stephen” and “Clifford Spencer,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$17,000 interbank transfer from Victim S to a Wells Fargo bank account opened in the name of “Gary Jimmie Stephen” in the Northern District of Illinois;

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

COUNT FOUR

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about December 13, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

SULTAN OMOGBADEBO ANIFOWOSHE,
also known as “Ayinde,” “Samuel Christopher Giles,” and “Johnson Maxwell,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$14,220 cashier’s check deposit from Victim L to a PNC bank account opened in the name of “Samuel Christopher Giles” in the Northern District of Illinois;

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

COUNT FIVE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about June 13, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

BABATUNDE IBRAHEEM AKARIGIDI,
also known as “AK” and “Charles Mark,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$28,450 cashier’s check deposit from Victim N to a JP Morgan Chase bank account opened in the name of “Charles Mark” in the Northern District of Illinois;

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

COUNT SIX

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about September 7, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

ADEWALE ANTHONY ADEWUMI,
also known as “Johnson Collins,” and “Adrian Scott,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$1,800 bank teller transfer from Victim P to a Bank of America bank account opened in the name of “Johnson Collins” in Lucas, Texas;

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

COUNT SEVEN

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about May 25, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

ADEWALE ANTHONY ADEWUMI,
also known as “Johnson Collins,” and “Adrian Scott,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$13,060 wire transfer from Victim T to a Bank of America bank account opened in the name of “Adrian Scott” in Dallas, Texas;

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

COUNT EIGHT

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about July 31, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

MIRACLE AYOKUNLE OKUNOLA,
also known as “Luke Johnson,” “Abraham Tom,” and “Jacob Zack,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$2,984 wire transfer from Victim Q to a JP Morgan Chase bank account in the name of “Luke Johnson” in the Northern District of Illinois;

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

COUNT NINE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about November 27, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,”

OLANIYI ADELEYE OGUNGBAIYE,
also known as “DonChiChi” and “Donchichivirus,” and

OLUROTIMI AKITUNDE IDOWU,
also known as “Idol,” “Roy Frederick Benson,” “Norman I. Williams,” “Marcus Smith,” “Andred Marcus Smith,” and “Christ C. Cooper,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$4,100 wire transfer from Victim G to a U.S. Bank bank account in the name of “Marcus Smith” in the Northern District of Illinois;

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

COUNT TEN

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about August 9, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

OLANIYI NASIRU OJIKUTU,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$60,000 wire transfer from Victim U to a JP Morgan Chase bank account opened in the name of OLANIYI OJIKUTU in the Northern District of Illinois;

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

COUNT ELEVEN

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. On or about October 25, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

OLANIYI NASIRU OJIKUTU,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$32,000 wire transfer from Victim V to a TCF bank account opened in the name of OLANIYI OJIKUTU in the Northern District of Illinois;

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

COUNT TWELVE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 13 of Count One of this indictment are incorporated here.

2. On or about December 18, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

OLANIYI NASIRU OJIKUTU,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an approximately \$10,000 wire transfer from Victim S to a Byline Bank account opened in the name of “Jiks Procurement and Global Services LLC” in the Northern District of Illinois;

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

COUNT THIRTEEN

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. At times material to this indictment, DHL International (“DHL”) was a commercial interstate carrier within the meaning of Title 18, United States Code, Section 1341.

3. It was further part of the scheme that ETA, ANIFOWOSHE, and others obtained fraudulent passports by sending passport photographs to a passport counterfeiter in Nigeria, who sent fraudulent passports to the United States via DHL.

4. On or about March 29, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

SULTAN OMOGBADEBO ANIFOWOSHE,
also known as “Ayinde,” “Samuel Christopher Giles,” and “Johnson Maxwell,”
defendant herein, for the purpose of executing the above-described scheme to defraud,
did knowingly cause to be delivered by DHL a package containing a fraudulent
passport, which package was addressed to an address at 2455 West Bryn Mawr
Avenue, Chicago, in the Northern District of Illinois;

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNT FOURTEEN

The SPECIAL JULY 2018 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 15 of Count One of this indictment are incorporated here.

2. Between no later than on or about October 27, 2016, and continuing through on or about November 27, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA,
also known as “Captain” and “Etaoko,” and

OLANIYI ADELEYE OGUNGBAIYE,
also known as “DonChiChi,” and “Donchichivirus,”

defendants herein, knowingly conspired with each other, Co-Schemer L.M., and others known and unknown, to knowingly and with intent to defraud access a protected computer, without authorization, thereby furthering the intended fraud and obtaining a thing of value, namely money from Victim G and other internet scam victims, in violation of Title 18, United States Code, Sections 1030(a)(4) and 1030(c)(3)(A);

In violation of Title 18, United States Code, Section 1030(b).

COUNT FIFTEEN

The SPECIAL JULY 2018 GRAND JURY further charges:

In or around August 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL SAMUEL ETA
also known as “Captain” and “Etaoko,”

defendant herein, willfully and knowingly furnished to another for use, a false, forged, and counterfeited passport purporting to be a passport from the United Kingdom in the name of “Gary Jimmie Stephen;”

In violation of Title 18, United States Code, Sections 1543 and 2.

COUNT SIXTEEN

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about May 16, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

BABATUNDE LADEHINDE LABIYI,
also known as “Junior,” “Dave Beckham Smith,” “Beckham Smith Dave,”
“Chattman Ronald Stewart,” “George Patrick Thomas,” “Chris Thompson,” and
“James Cole,”

defendant herein, willfully and knowingly used, a false, forged, and counterfeited passport purporting to be a passport from France in the name of “Chattman Ronald Stewart;”

In violation of Title 18, United States Code, Section 1543.

COUNT SEVENTEEN

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about September 8, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

BARNABAS OGHENERUKEVWE EDJIEH,
also known as “Gary Jimmie Stephen” and “Clifford Spencer,”

defendant herein, willfully and knowingly used, a false, forged, and counterfeited passport purporting to be a passport from the United Kingdom in the name of “Gary Jimmie Stephen;”

In violation of Title 18, United States Code, Section 1543.

COUNT EIGHTEEN

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about April 7, 2018, in the Northern District of Illinois, Eastern Division,
and elsewhere,

SULTAN OMOGBADEBO ANIFOWOSHE,
also known as “Ayinde,” “Samuel Christopher Giles,” and “Johnson Maxwell,”
defendant herein, willfully and knowingly used, a false, forged, and counterfeited
passport purporting to be a passport from the United Kingdom in the name of
“Johnson Maxwell;”

In violation of Title 18, United States Code, Section 1543.

COUNT NINETEEN

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about December 6, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

BABATUNDE IBRAHEEM AKARIGIDI,
also known as "AK" and "Charles Mark,"

defendant herein, willfully and knowingly used, a false, forged, and counterfeited passport purporting to be a passport from the United Kingdom in the name of "Charles Mark;"

In violation of Title 18, United States Code, Section 1543.

COUNT TWENTY

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about May 23, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

MIRACLE AYOKUNLE OKUNOLA,
also known as “Luke Johnson,” “Abraham Tom,” and “Jacob Zack,”
defendant herein, willfully and knowingly used, a false, forged, and counterfeited
passport purporting to be a passport from Nigeria in the name of “Luke Johnson;”

In violation of Title 18, United States Code, Section 1543.

COUNT TWENTY-ONE

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about October 10, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

OLUROTIMI AKITUNDE IDOWU,
also known as “Idol,” “Roy Frederick Benson,” “Norman I. Williams,” “Marcus Smith,” “Andred Marcus Smith,” and “Christ C. Cooper,”

defendant herein, willfully and knowingly used, a false, forged, and counterfeited passport purporting to be a passport from the United Kingdom in the name of “Andred Marcus Smith;”

In violation of Title 18, United States Code, Section 1543.

COUNT TWENTY-TWO

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about May 16, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

BABATUNDE LADEHINDE LABIYI,
also known as “Junior,” “Dave Beckham Smith,” “Beckham Smith Dave,”
“Chattman Ronald Stewart,” “George Patrick Thomas,” “Chris Thompson,” and
“James Cole,”

defendant herein, knowingly made a false statement for the purpose of influencing the action of JP Morgan Chase, the accounts of which are insured by the Federal Deposit Insurance Corporation, in connection with an application, in that defendant opened a bank account using a fraudulent passport, knowing that the fraudulent passport did not contain his true identity;

In violation of Title 18, United States Code, Section 1014.

COUNT TWENTY-THREE

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about September 8, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

BARNABAS OGHENERUKEVWE EDJIEH,
also known as “Gary Jimmie Stephen” and “Clifford Spencer,”

defendant herein, knowingly made a false statement for the purpose of influencing the action of Bank of America, the accounts of which are insured by the Federal Deposit Insurance Corporation, in connection with an application, in that defendant opened a bank account using a fraudulent passport, knowing that the fraudulent passport did not contain his true identity;

In violation of Title 18, United States Code, Section 1014.

COUNT TWENTY-FOUR

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about April 7, 2018, in the Northern District of Illinois, Eastern Division,
and elsewhere,

SULTAN OMOGBADEBO ANIFOWOSHE,
also known as “Ayinde,” “Samuel Christopher Giles,” and “Johnson Maxwell,”

defendant herein, knowingly made a false statement for the purpose of influencing the action of JP Morgan Chase, the accounts of which are insured by the Federal Deposit Insurance Corporation, in connection with an application, in that defendant opened a bank account using a fraudulent passport, knowing that the fraudulent passport did not contain his true identity;

In violation of Title 18, United States Code, Section 1014.

COUNT TWENTY-FIVE

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about December 6, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

BABATUNDE IBRAHEEM AKARIGIDI,
also known as "AK" and "Charles Mark,"

defendant herein, knowingly made a false statement for the purpose of influencing the action of JP Morgan Chase, the accounts of which are insured by the Federal Deposit Insurance Corporation, in connection with an application, in that defendant opened a bank account using a fraudulent passport, knowing that the fraudulent passport did not contain his true identity;

In violation of Title 18, United States Code, Section 1014.

COUNT TWENTY-SIX

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about May 23, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

MIRACLE AYOKUNLE OKUNOLA,
also known as “Luke Johnson,” “Abraham Tom,” and “Jacob Zack,”

defendant herein, knowingly made a false statement for the purpose of influencing the action of JP Morgan Chase, the accounts of which are insured by the Federal Deposit Insurance Corporation, in connection with an application, in that defendant opened a bank account using a fraudulent passport, knowing that the fraudulent passport did not contain his true identity;

In violation of Title 18, United States Code, Section 1014.

COUNT TWENTY-SEVEN

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about October 10, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

OLUROTIMI AKITUNDE IDOWU,
also known as “Idol,” “Roy Frederick Benson,” “Norman I. Williams,” “Marcus Smith,” “Andred Marcus Smith,” and “Christ C. Cooper,”

defendant herein, knowingly made a false statement for the purpose of influencing the action of JP Morgan Chase, the accounts of which are insured by the Federal Deposit Insurance Corporation, in connection with an application, in that defendant opened a bank account using a fraudulent passport, knowing that the fraudulent passport did not contain his true identity;

In violation of Title 18, United States Code, Section 1014.

FORFEITURE ALLEGATION ONE

The SPECIAL JULY 2018 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1341 and 1343, as set forth in this Indictment, defendants ETA, OGUNGBAIYE, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, and OJIKUTU shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of at least \$4,733,097.12.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

FORFEITURE ALLEGATION TWO

The SPECIAL JULY 2018 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1030(a)(4), as set forth in this Indictment, defendants ETA, OGUNGBAIYE, LABIYI, EDJIEH, ANIFOWOSHE, AKARIGIDI, ADEWUMI, OKUNOLA, IDOWU, and OJIKUTU shall forfeit to the United States of America:

a. any property constituting and derived from proceeds obtained directly and indirectly as a result of the offense, as provided in Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i)(1)(B); and

b. any personal property used and intended to be used to commit and to facilitate the commission of the offense, as provided in Title 18, United States Code, Section 1030(i)(1)(A).

2. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of at least \$4,733,097.12.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY