

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

AKEEM KOSOKO

No. 20 CR 636

Violations: Title 18, United States
Code, Sections 371, 641, and 1708

COUNT ONE

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

1. From in or around March 2019 through in or around August 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

AKEEM KOSOKO,

defendant herein, conspired with AHMED KOSOKO and others known and unknown, to commit an offense against the United States, namely, to steal mail in violation of Title 18, United States Code, Section 1708, and to steal government funds, in violation of Title 18, United States Code, Section 641.

2. It was part of the conspiracy that AKEEM KOSOKO recruited United States Postal carriers, including his brother AHMED KOSOKO, to steal United States mail containing financial instruments, including United States Treasury checks, issued to other individuals

3. It was part of the conspiracy that United States Postal carriers, including AHMED KOSOKO, stole United States mail containing financial instruments, and provided the stolen mail to AKEEM KOSOKO, in exchange for payment or the promise of payments.

4. It was further part of the conspiracy that AKEEM KOSOKO altered, and caused to be altered, the stolen financial instruments, including by changing the payee of the checks.

5. It was further part of the conspiracy that AKEEM KOSOKO recruited other individuals with bank accounts (the “account holders”), and deposited the stolen and fraudulently altered financial instruments, including United States Treasury checks, into the account holders’ bank accounts.

6. It was further part of the conspiracy that AKEEM KOSOKO deposited and caused to be deposited at least two fraudulent and altered United States Treasury checks in amounts ranging from approximately \$2,400 to approximately \$3,400 at Bank A.

7. It was further part of the conspiracy that AKEEM KOSOKO attempted to and did make withdrawals from the account holders’ bank accounts at the financial institutions into which the stolen and fraudulent checks had been deposited.

8. It was further part of the conspiracy that AKEEM KOSOKO sold stolen financial instruments, including United States Treasury checks, to other individuals.

9. It was further part of the conspiracy that AKEEM KOSOKO, concealed and hid, and caused to be concealed and hidden, the purpose of the acts done in furtherance of the conspiracy.

Overt Acts

10. In furtherance of and to effect the objects of the conspiracy, AKEEM KOSOKO committed and caused to be committed the following overt acts, among

others, in the Northern District of Illinois:

a. On or about May 7, 2020, AKEEM KOSOKO offered for sale United States Treasury checks to Individual A.

b. On or about May 8, 2020, AKEEM KOSOKO sold a United States Treasury check in the amount of \$1,200, in the name of Victim A.T., to Individual A.

c. On or about May 14, 2020, AKEEM KOSOKO sold a United States Treasury check, in the amount of \$2,400, in the name of Victim A.M.M. to Individual A.

d. On or about May 14, 2020, AKEEM KOSOKO sold a United States Treasury check, in the amount of \$2,400, in the name of Victim V.M.M., to Individual A.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about May 8, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

AKEEM KOSOKO,

defendant herein, did sell and convey, without authority, money of the United States, namely, a United States Treasury check in the amount of \$1,200, in the name of Victim A.T., to be drawn on the United States Treasury, and defendant did so knowingly with the intent to deprive the owner of the use or benefit of that money;

In violation of Title 18, United States Code, Section 641.

COUNT THREE

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about May 14, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

AKEEM KOSOKO,

defendant herein, did sell and convey, without authority, money of the United States, namely, a United States Treasury check in the amount of \$2,400, in the name of Victim A.M.M., to be drawn on the United States Treasury, and defendant did so knowingly with the intent to deprive the owner of the use or benefit of that money;

In violation of Title 18, United States Code, Section 641.

COUNT FOUR

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

On or about May 14, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

AKEEM KOSOKO,

defendant herein, did sell and convey, without authority, money of the United States, namely, a United States Treasury check, in the amount of \$2,400, in the name of Victim V.M.M., to be drawn on the funds of the United States Treasury, and defendant did so knowingly with the intent to deprive the owner of the use or benefit of that money;

In violation of Title 18, United States Code, Section 641.

COUNT FIVE

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about May 8, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

AKEEM KOSOKO,

defendant herein, did knowingly receive and possess mail, namely one piece of first
class mail containing one United States Treasury check addressed to Victim A.T.,
which had been stolen from a mail route, and that defendant knew had been stolen;

In violation of Title 18, United States Code, Section 1708.

COUNT SIX

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about May 14, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

AKEEM KOSOKO,

defendant herein, did knowingly receive and possess mail, namely one piece of first class mail containing one United States Treasury check addressed to Victim A.M.M., which had been stolen from a mail route, and that defendant knew had been stolen;

In violation of Title 18, United States Code, Section 1708.

COUNT SEVEN

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about May 14, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

AKEEM KOSOKO,

defendant herein, did knowingly receive and possess mail, namely one piece of first class mail containing one United States Treasury check addressed to Victim V.M.M., which had been stolen from a mail route, and that defendant knew had been stolen;

In violation of Title 18, United States Code, Section 1708.

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 371, as set forth in this Indictment, defendant shall forfeit to the United States of America any property that 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. If any of the property, 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 difficult, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

signed by Matthew F. Madden on behalf of the
UNITED STATES ATTORNEY