

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

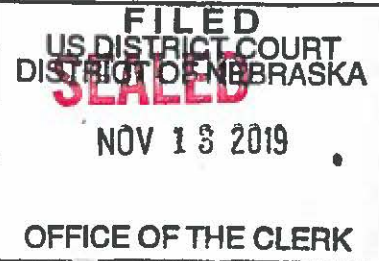
UNITED STATES OF AMERICA,

Plaintiff,

vs.

ONOME IJOMONE
and
MICHEAL OLORUNYOMI,

Defendants.



8:18CR82

SUPERSEDING INDICTMENT

18 U.S.C. § 1349
18 U.S.C. § 1028(a)(7)
18 U.S.C. § 1029(a)(2)

The Grand Jury charges that

COUNT I
CONSPIRACY TO COMMIT WIRE FRAUD
18 U.S.C § 1349

INTRODUCTION

1. Beginning at a time unknown to the Grand Jury, but no later than September 2015 to on or about June 2017, ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, and other individuals known and unknown to the Grand Jury, devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

THE SCHEME

2. It was a part of the scheme and artifice to defraud that ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, and individuals known and unknown to the Grand Jury would pose as the significant other of romance scam victims. ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, would develop a relationship with the romance scam victim and then request the romance scam victim's bank account information in order to

have fraudulently obtained funds funneled through the romance scam victim's account. It was also a part of the scheme and artifice to defraud that ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, would convince the romance scam victims to send their own money via wire, to other accounts, leading the romance scam victim to believe that they were assisting their significant other in legitimate transactions.

MANNER AND MEANS

It was part of the scheme that:

3. ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, and other individuals known and unknown to the Grand Jury, created fictitious profiles on dating websites and posed as individuals looking for love or posed as financial advisors to those fictitious individuals on the dating website. ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, and others unknown to the Grand Jury, developed and maintained online dating relationships with romance scam victims in order to either obtain funds directly from their romance scam victim or in order to use the romance scam victim's bank account to funnel fraudulently obtained money. In some cases, the individual using the fictitious dating profile provided the romance scam victim with the name and contact information of a financial advisor who would further help convince the romance scam victim about the legitimacy of the proposed transactions. The romance scam victims, thinking that the reason that their significant other was asking for money or for their bank account information was legitimate, provided ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, with money and/or their bank account information. In fact, ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, were not the significant other of these romance scam victims and were not seeking assistance in legitimate transactions. Instead, ONOME IJOMONE and MICHEAL

OLORUNYOMI, the defendants, were leading on the romance scam victims in order to fraudulently obtain their bank account information and money from the romance scam victims.

MICHEAL OOLORUNYOMI, the defendant, and others unknown to the Grand Jury, convinced romance scam victim J.S. to wire J.S.'s own money to accounts that MICHEAL OOLORUNYOMI, the defendant, and others unknown to the Grand Jury, told J.S. to wire the money to. J.S. thought that he was communicating with a woman named "Lora Lucinda" and thought he was assisting "Lucinda" in legitimate financial transactions. In order to convince J.S. to wire the money, "Lucinda" told J.S. that she was working with a financial advisor named "David Pellow." In fact, "Pellow" is MICHEAL OOLORUNYOMI, the defendant, and was not a financial advisor working with "Lucinda."

ONOME IJOMONE, the defendant, and others unknown to the Grand Jury, convinced K.S., to wire K.S.'s own money to accounts that ONOME IJOMONE, the defendant, and others unknown to the Grand Jury, told K.S. to wire the money to. K.S. thought she was communicating with a man named "Michael Marcatante" and thought she was assisting "Marcatante" in legitimate financial transactions. In order to convince K.S. to wire the money, "Marcatante" provided K.S. with a phone number to an alleged bank to verify the account balance. MICHEAL OOLORUNYOMI, the defendant, worked with another co-conspirator to set up the fraudulent phone verification system which ONOME IJOMONE, the defendant, provided to K.S. In fact, "Marcatante" is ONOME IJOMONE, the defendant, and not the significant other of K.S.

4. Pursuant to this scheme, a loss in excess of \$480,000 can be attributed to the defendants and the co-conspirators.

5. Beginning at a time unknown to the Grand Jury, but no later than September 2015 through June 2017, ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants herein, and others known and unknown to the Grand Jury, in the District of Nebraska and elsewhere, did unlawfully, willfully and knowingly conspire, combine, confederate and agree with each other and other individuals unknown to the Grand Jury, to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and artifice to defraud, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds in violation of Title 18, United States Code, Section 1343, as described in paragraphs 1 through 4 above, in that the defendants and other individuals known and unknown to the Grand Jury fraudulently convinced romance scam victims to send money via wire at the direction of the defendants and others known and unknown to the Grand Jury.

In violation of Title 18, United States Code, Section 1349.

COUNT II
IDENTITY THEFT
18 U.S.C. § 1028(a)(7)

Beginning on or about September 2015 to June 2017, in the District of Nebraska, and elsewhere, ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, did knowingly transfer, possesses, or use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit: bank account access information, knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit: wire fraud in violation of Title 18, United States Code, Section 1343, and

as a result of the offense, ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, or any other individual committing the offense, obtained anything of value aggregating \$1,000 or more during any one-year period.

In violation of Title 18, United States Code, Section 1028(a)(7).

COUNT III
ACCESS DEVICE FRAUD
18 U.S.C. § 1029(a)(2)

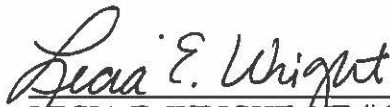
Beginning on or about September 2015 to June 2017, in the District of Nebraska, and elsewhere, ONOME IJOMONE and MICHEAL OLORUNYOMI, the defendants, did knowingly and with intent to defraud, use or traffic in one or more unauthorized access devices during a one-year period, and by such conduct obtained things of value aggregating \$1,000 or more during that period, such conduct having an effect on interstate or foreign commerce.

In violation of Title, 18 United States Code, Section 1029(a)(2).

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.



LECIA E. WRIGHT, NE # 24562
Assistant U.S. Attorney