
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Michael A. Hammer, U.S.M.J.
v. :
:
:
: **4170**
: Mag. No. 17- ~~4155~~
MICHAEL AWOTUNDE :
a/k/a "Baba Michael" : **CRIMINAL COMPLAINT**
a/k/a "Bro Micheal" :


I, Traveis Guy, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:


SEE ATTACHMENT B

Continued on the attached page and made a part hereof:


Special Agent Traveis Guy
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
October 31, 2017 in Newark, New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

(Conspiracy to Import Heroin into the United States)

From on or about February 8, 2017 through on or about October 19, 2017, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL AWOTUNDE

a/k/a "Baba Michael"

a/k/a "Bro Micheal,

did knowingly and intentionally conspire and agree with Ramota Okuleye, and others to import into the United States from a place outside thereof, namely Nigeria, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 952(a) and 960(b)(2).

In violation of Title 21, United States Code, Section 963.

ATTACHMENT B

I, Traveis Guy, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. The FBI in conjunction with the Department of Homeland Security ("HSI") have been investigating a drug trafficking organization (the "DTO") operating in Nigeria, Chicago, New York, New Jersey, and elsewhere.

2. During the course of the investigation, law enforcement learned that the DTO was importing heroin into the United States from Lagos, Nigeria, via drug couriers booked on flights aboard commercial airlines. Law enforcement was also able to gain access to the DTO through a confidential source ("CS-1"), who engaged in numerous recorded conversations¹ with Lateef Alagbada ("Alagbada"), the leader of the DTO.² Information gathered over the course of the investigation, including conversations between Alagbada and CS-1, revealed that the Alagbada and other of his conspirators employed individuals to serve as internal drug couriers (the "Couriers"). More specifically, these Couriers ingested pellets of heroin, flew to the United States, met with members of the DTO based in the United States, and provided those individuals with the ingested heroin once the Couriers had excreted the heroin.

3. Under the supervision of law enforcement, CS-1 arranged with Alagbada to obtain heroin from the DTO. In particular, during consensually recorded telephone calls between CS-1 and Alagbada, Alagbada agreed to send a Courier, later identified as Ramota Okuleye ("OKULEYE") from Lagos, Nigeria, to Newark, New Jersey to meet with CS-1 and to provide CS-1 with heroin.

4. On or about January 26, 2017, OKULEYE boarded a commercial

¹ The majority of these conversations are in Yoruba, a Nigeria dialect, and have been translated into English.

² Alagbada has been charged in federal indictment with: (1) count of conspiracy to distribute and possess with the intent to distribute heroin, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), in violation of Title 21, United States Code, Section 846; and (2) conspiracy to import heroin into the United States, contrary to Title 21, United States Code, Sections 952(a) and 960(b)(1), in violation of Title 21, United States Code, Section 963. See Crim. No. 17-00227 (JMV).

flight which departed Nigeria and arrived in Newark on or about January 27, 2017. Under the supervision of law enforcement, CS-1 met with OKULEYE at Newark Liberty Airport, in Newark, New Jersey. CS-1 drove defendant OKULEYE to a hotel in Elizabeth, New Jersey (the "Hotel"). CS-1 stated that he/she would check in with OKULEYE to collect the heroin after she had excreted it.

5. On or about January 29, 2017, OKULEYE spoke with CS-1 and told CS-1 that the heroin was ready for pick-up. As a result, CS-1 went to the Hotel and met with OKULEYE. During the course of that meeting, OKULEYE stated that she primarily worked for defendant MICHAEL AWOTUNDE, a/k/a "Baba Michael", a/k/a "Bro Micheal" ("AWOTUNDE"), but was transporting drugs on behalf of Alagbada on this trip. She told CS-1 that CS-1 should reach out to defendant AWOTUNDE for future transactions. Additionally, during this meeting OKULEYE gave CS-1 a bag containing approximately sixty-three (63) pellets, which was not the full amount of heroin pellets that OKULEYE had ingested.

6. Thereafter, on or about February 1, 2017, OKULEYE informed CS-1 that she had excreted the remaining heroin pellets. On that same day, CS-1, under the supervision of law enforcement, collected another approximately five (5) pellets from OKULEYE.

7. The substance inside the sixty-eight (68) pellets that OKULEYE provided to CS-1 was later tested in a laboratory and determined to be approximately 979 grams of heroin.

8. Shortly after obtaining a telephone number for defendant AWOTUNDE, on or about February 8, 2017, CS-1 called defendant AWOTUNDE and the two discussed defendant AWOTUNDE sending future shipments of heroin from Nigeria to the United States. During the course of that recorded conversation, defendant AWOTUNDE confirmed that he has people in the United States who can collect money from CS-1 for payment for the heroin. Defendant AWOTUNDE also explained to CS-1 that he (defendant AWOTUNDE) would try to do business with CS-1 based on OKULEYE's recommendation of CS-1.

9. On or about September 8, 2017, CS-1 spoke with defendant AWOTUNDE who then agreed to sell heroin to CS-1.³ On or about September 29, 2017, OKULEYE spoke with CS-1 and indicated that she would be returning to the United States to meet with CS-1 and provide CS-1 with heroin.

10. On or about October 19, 2017, OKULEYE flew, via commercial airline, from Lagos, Nigeria, to Newark, New Jersey. Shortly after her flight landed, Customs and Border Patrol ("CBP") conducted a secondary interview of

³ Law enforcement believes that Individual-1 was located in Nigeria at the time this call took place.

OKULEYE. During that interview, OKULEYE told CBP she had traveled to the United States to meet with her daughter, but, when asked, she told CBP that she did not know her daughter's birthdate. Shortly thereafter, OKULEYE signed a written consent to have an x-ray scan performed of her stomach. The x-ray revealed the presence of what appeared to be pellets. Over the course of approximately three days, OKULEYE excreted approximately fifty-one (51) pellets that later tested positive for heroin.

11. As a result, on or about October 24, 2017, OKULEYE was charged via a two-count criminal complaint. See Mag. No. 17-7153 (CLW). Count One charged her with conspiracy to possess with intent to distribute controlled substances, contrary to Title 841(a)(1) and (B)(1)(B), in violation of Title 21, United States Code, Section 846. Count Two charged her with conspiracy to import heroin into the United States contrary to Title 21, United States Code, Sections 952(a)(and 960(b)(2), in violation of Title 21, United States Code, Section 963.

12. On or about October 26, 2017, CS-1 spoke to defendant AWOTUNDE, who informed CS-1 that he was in the United States. During the course of that recorded conversation, defendant AWOTUNDE expressed concern over OKULEYE's arrest. Defendant AWOTUNDE also stated that he has previously sent couriers to the United States. Defendant AWOTUNDE also stated that he did not want to do business in the United States again, but did not think that law enforcement in the United States had the time or money to deal with individuals overseas.