UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 18-
	:	
TEMILADE ADEKUNLE	:	18 U.S.C. §§ 1028A and 1349

INFORMATION

COUNT ONE
(Conspiracy to Commit Wire Fraud)

The defendant having waived in open court prosecution by indictment and any objection based upon venue, the United States Attorney for the District of New Jersey charges:

BACKGROUND

1. At all times relevant to this Information:

a. Defendant TEMILADE ADEKUNLE ("defendant ADEKUNLE") was a resident of Georgia.

b. "Victim Company 1" was a publicly-traded company with its headquarters in New Jersey. Victim Company 1 sold, among other things, insurance policies and investment products. Victim Company 1 offered a web-based portal (the "Portal") through which account holders could, among other things, access their accounts, view their insurance policies and/or investment products, edit personal account information, and request that Victim Company 1 transfer money from their accounts. The Portal was secured, and policyholders and investors were able to create and log into their

account on the Portal by using either personal identification information or a unique username and password. Victim Company 1 had two servers, one in Pennsylvania and one in Roseland, New Jersey (the "New Jersey Server"), that supported the Portal. Victim Company 1 also offered a telephone customer service center (the "Center") through which account holders could, among other things, access information about their accounts and cause Victim Company 1 to take action (for instance mailing a check) at the account holder's request.

c. "Victim 1" had an account with Victim Company 1.

d. "Victim 2" had an account with Victim Company 1.

THE CONSPIRACY

2. In or about August 2017, in the District of New Jersey and elsewhere, the defendant,

TEMILADE ADEKUNLE,

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud, and to obtain money and property from Victim Company 1 and others by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs signals, pictures, and sounds, namely, wire communications to New Jersey, contrary to Title 18, United States Code, Section 1343.

GOAL OF THE CONSPIRACY

3. It was the goal of the conspiracy for defendant ADEKUNLE and others to enrich themselves by fraudulently obtaining money from Victim Company 1 and others by, among other things, impersonating account holders, requesting a disbursement of account funds from the victim companies, and then obtaining those funds.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that, on or about August 8, 2017, a member of the conspiracy contacted the Center. During the ensuing telephone conversation, the caller provided Victim 1's name as his (the caller's) name, provided Victim 1's personal identification information, stated that he wanted to make a withdrawal from his account with Victim Company 1, and asked what the maximum amount was that he could withdraw from the account. After an employee at the Center told the caller that he could withdraw a maximum of $34,636.10, the caller withdrew $34,636.10 from the account.

5. It was further part of the conspiracy that, on or about August 8, 2017, a member of the conspiracy placed a separate call to the Center. During the ensuing telephone conversation, the caller provided Victim 2's name as his (the caller's) name, provided Victim 2's personal identification information, stated that he wanted to make a withdrawal from his account with Victim Company 1, and asked what the maximum amount was that he could

withdraw from the account. The caller thereafter withdrew approximately $85,000 from the account.

6. It was further part of the conspiracy that, on or about August 9, 2017, Victim Company 1, based on the fraudulent actions discussed above, issued a check for $34,636.10 in the name of Victim 1. Similarly, on or about August 10, 2017, Victim Company 1, based on the fraudulent actions discussed above, issued a check for $85,000.45 in the name of Victim 2. The issuance of the two checks was accomplished through, among other things, interstate wire communications to New Jersey. Pursuant to its policies, Victim Company 1 sent the check for Victim 1 to Victim 1's address of record and the check for Victim 2 to Victim 2's address of record. Victim Company 1 sent both checks through a mail carrier ("the Carrier").

7. It was further part of the conspiracy that defendant ADEKUNLE and his conspirators contacted the Carrier and caused the Carrier to hold the packages containing the checks for Victim 1 and Victim 2 at one of the Carrier's branch locations ("the Branch") instead of delivering them to the addresses of Victim 1 and Victim 2.

8. It was further part of the conspiracy that, on or about August 14, 2017, defendant ADEKUNLE entered the Branch and, using a driver's license with defendant ADEKUNLE's picture and Victim 2's name and address, obtained a package he believed contained the check from Victim Company 1 to Victim 2.

9. It was further part of the conspiracy that on or about August 14, 2017, a conspirator of defendant ADEKUNLE entered the Branch and, using a driver's license with the conspirator's picture and Victim 1's name and address, obtained a package he believed contained the check from Victim Company 1 to Victim 1.

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

COUNT TWO
(Aggravated Identity Theft)

The allegations set forth in paragraphs 1 and 3 through 9 of Count One of this Information are hereby repeated, realleged, and incorporated as if fully set forth herein.

1. On or about August 14, 2017, in the District of New Jersey and elsewhere, the defendant,

TEMILADE ADEKUNLE,

during and in relation to a felony violation of 18 U.S.C. §§ 1343 and 1349 as set forth in Count One of this Information, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, specifically the name and address of Victim 2.

In violation of Title 18, United States Code, Sections 1028A(a)(1).

FORFEITURE ALLEGATION

1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses charged in this Information, the government will seek forfeiture from defendant ADEKUNLE, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to such violations.

3. If by any act or omission of defendant ADEKUNLE any of the property subject to forfeiture herein:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. 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), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant ADEKUNLE up to the value of the property described in this forfeiture allegation.

Craig Carpenito

CRAIG CARPENITO
UNITED STATES ATTORNEY