

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY



UNITED STATES OF AMERICA	:	Hon. Leda D. Wettre
	:	
v.	:	Mag. No. 18-8207
	:	
FUNMILOLA ADEKANMI	:	<u>CRIMINAL COMPLAINT</u>

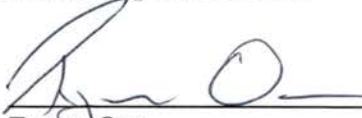
I, Ryan Orr, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:



Ryan Orr
Postal Inspector
United States Postal Inspection Service

Sworn to before me and subscribed in my presence,
October 23, 2018 in Essex County, New Jersey

HONORABLE LEDA D. WETTRE
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One
(Conspiracy to Commit Bank Fraud)

From at least as early as in or around July 2016 through in or around May 2017, in the District of New Jersey, and elsewhere, the defendant,

FUNMILOLA ADEKANMI

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud a financial institution, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain monies, funds, assets, and other property owned by and under the custody and control of such financial institution, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

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

Count Two
(Aggravated Identity Theft)

On or about April 10, 2017, in the District of New Jersey, and elsewhere,
the defendant,

FUNMILOLA ADEKANMI

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another individual, namely a credit card account of Victim Cardholder 1, during and in relation to a felony violation of a provision contained in Chapter 63 of the United States Code, that is, conspiracy to commit bank fraud in violation of Title 18, United States Code, Section 1349, charged in Count One of this Criminal Complaint.

In violation of Title 18, United States Code, Section 1028A(a)(1), and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Ryan Orr, am a Postal Inspector with the United States Postal Inspection Service ("USPIS"). I have knowledge about the facts set forth below from my involvement in the investigation, my review of reports, documents, pictures, videos, witness interviews, and discussions with other law enforcement officials. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have not set forth each and every fact that I know concerning this investigation. All statements described in this Criminal Complaint are relayed in substance and in part. In addition, 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.

Relevant Individuals and Entities

1. At various times relevant to this Criminal Complaint:
 - a. Defendant FUNMILOLA ADEKANMI ("ADEKANMI") was a resident of Duluth, Georgia.
 - b. Akintunde Adeyemi, a/k/a "AK", a co-conspirator not charged as a defendant herein, was a resident of East Orange, New Jersey and Duluth, Georgia.
 - c. Oluwaseun Jato, a co-conspirator not charged as a defendant herein, was a resident of Newark, New Jersey.
 - d. "Victim Bank 1" was a "financial institution" as that term is defined in Title 18, United States Code, Section 20, offering, among other things, credit cards to customers.
 - e. "Victim Cardholder 1" was a customer of Victim Bank 1 who resided in or around Stillwater, Minnesota and held a credit card account ending in account number 8693.

Overview of the Conspiracy

2. Beginning at least as early as in or around July 2016 through in or around May 2017, defendant ADEKANMI conspired with Adeyemi, Jato, and others to obtain control of credit card accounts using stolen personal identifying information ("PII") of third parties. Specifically, Adeyemi, Jato, and other co-conspirators submitted to Victim Bank 1 applications for credit card accounts using stolen PII, including the names, addresses, and other identifying information of the unsuspecting identity theft victims. After

establishing the accounts, the co-conspirators contacted Victim Bank 1 to change the address associated with the accounts so that Victim Bank 1 would send the credit cards to those addresses. The co-conspirators then monitored those addresses and intercepted the cards before the residents of the addresses received them. Some of these addresses were located near the defendants' residences in New Jersey and Georgia. The co-conspirators, including ADEKANMI, then used the cards at retail stores in New Jersey and Georgia, among other places, to purchase merchandise, including gift cards, which they then used or sold for profits. Through these methods, the co-conspirators defrauded Victim Bank 1 of over \$600,000.

The Defendant's Participation in the Conspiracy

3. The investigation to date has revealed that the co-conspirators played unique roles in the scheme. Adeyemi obtained the stolen PII from other co-conspirators and used it to create the fraudulent credit card accounts. He then sent the account information to others, including Jato, who coordinated with other co-conspirators to retrieve the credit cards associated with the compromised accounts. Adeyemi also provided compromised credit card accounts to ADEKANMI, who used the accounts to make retail purchases, including purchasing gift cards. ADEKANMI received a percentage of the scheme's profits for her assistance in the fraudulent transactions.

4. Victim Bank 1 identified the compromised accounts associated with the scheme (the "Compromised Accounts") through several common characteristics, including: the telephone number used to contact Victim Bank 1 to change the address on the account or to take other action relating to the account; the IP address from which the fraudulent account application was submitted; and the domain name of the email address listed on the application. This information, along with evidence law enforcement has collected from search warrants of numerous email accounts, bank records, video surveillance footage from retail stores at which the co-conspirators used some of the Compromised Accounts, and witness interviews, reveals numerous connections between Adeyemi, Jato, ADEKANMI and the Compromised Accounts.

A. The Adeyemi Domains and Email Accounts

5. Many of the applications for the Compromised Accounts listed email addresses with the domain names "Southwildlife.com," "Ultramilesclub.com," and "Andconsul.com" (the "Subject Domains"). Law enforcement discovered numerous emails associated with the Subject Domains in an email account used by Adeyemi ("Adeyemi Email Account 1"), including email communications from Victim Bank 1 relating to certain Compromised Accounts. Moreover, registration records relating to the Southwildlife.com domain list Adeyemi Email Account 1 as the email account associated with the

registration. In addition to Adeyemi Email Account 1, law enforcement has identified two other email accounts Adeyemi used to facilitate the scheme ("Adeyemi Email Accounts 2 and 3").

6. Law enforcement has determined that Adeyemi used the Adeyemi Email Accounts. Specifically, agents have reviewed chat communications discovered in the Adeyemi Email Accounts in which the user is referred to as "AK," Adeyemi's principal alias, or "Saintaklo," another alias Adeyemi has used. In one chat, Adeyemi stated,¹ "i used to have this ID saintaklo," "[I] just came back online after almost 3 years," "I did 32 months, money laundry and credit card fraud .. but i am good[.]" Notably, in or around October 2015, Adeyemi was convicted in the Superior Court of New Jersey in connection with a credit card fraud scheme and was sentenced to approximately 2.5 years in prison. Adeyemi likely was referring to that conviction and sentence in this chat. Later in the chat, he stated, "[I] want to get back to work[,] 32 months can't stop me man." Moreover, agents discovered travel itinerary in Adeyemi's full name in one of the Adeyemi Email Accounts. Agents also discovered photographs of an individual matching the general appearance of Adeyemi in one of the Adeyemi Email Accounts. Last, Adeyemi acknowledged using at least one of the Adeyemi Email Accounts in a consensually recorded call with a cooperating witness.

7. Law enforcement has reviewed communications from the Adeyemi Email Accounts in which Adeyemi discussed with other co-conspirators account information relating to Compromised Accounts, including the name and account number associated with the accounts.

8. In addition to providing to co-conspirators account information for Compromised Accounts, Adeyemi also assisted co-conspirators in creating fake identification cards in the names of the victim account holders, which the co-conspirators could use if required when making retail purchases. Adeyemi discussed these fake identification cards in email communications sent through Adeyemi Email Account 1. For example, on or about September 18, 2016, Adeyemi sent an email to a co-conspirator not charged as a defendant herein ("CC#1"). The subject line of the email was "This is how the ID will look after you finish it." The email attached a file named "Original Mississippi" that contained photos of a Mississippi driver's license. The email stated: "The name of this ID is: [Individual 1], if you look the ID well you will notice the last name comes first then comma sign, then the first name. Then you will notice the signatures across the 2 pictures on the ID have the name [Individual 1] written on them in signature form.. Pls take you time to study the sample pictures ... That exactly how I want the IDs to be.." Notably, the photograph on the fake identification card matches the general appearance of ADEKANMI.

¹ Any chat or email communications quoted in this complaint are set forth verbatim without correcting typographical or other errors.

9. As noted below, video surveillance from a retail store in Georgia depicts a transaction on or about April 10, 2017 involving a female who matches the appearance of ADEKANMI. The credit card used for that transaction was a Compromised Account in the name of Victim Cardholder 1. Law enforcement discovered an email in one of the Adeyemi Email Accounts attaching a picture of an identification card in the name of Victim Cardholder 1, but containing a photograph that appears to be ADEKANMI. Accordingly, there is probable cause to believe that Adeyemi created fake identification cards in the names of identity theft victims for ADEKANMI to use in making purchases with Compromised Accounts associated with those victims.

B. ADEKANMI's Use of the Compromised Accounts

10. As noted above, ADEKANMI's role in the scheme included using credit cards associated with the Compromised Accounts at retail stores. Law enforcement has reviewed images from video surveillance footage of transactions involving the Compromised Accounts, including multiple images of an individual matching ADEKANMI's general appearance. Law enforcement is familiar with ADEKANMI's physical appearance based upon a review of her Georgia driver's license photograph and from interviewing her in connection with this investigation. These transactions occurred at retail stores in the Atlanta Georgia area in or around April 2017.

11. Specifically, on or about April 10, 2017, a Compromised Account in the name of Victim Cardholder 1 was used at a retail store in or around Atlanta, Georgia for a transaction in the amount of \$155.95. Records provided by Victim Bank 1 show that this Compromised Account was opened using an email address with the domain name "ultramilesclub.com" which, as explained above, is a domain name associated with Adeyemi. As also noted above, law enforcement discovered in one of the Adeyemi Email Accounts an identification card in Victim Cardholder 1's name, but that included a photograph that appears to be ADEKANMI.

12. Law enforcement has reviewed similar surveillance images in connection with retail transactions involving Compromised Accounts on April 6, 8, and 10, 2017, and the individual depicted in those images matches the appearance of ADEKANMI.

13. On August 30, 2018, postal inspectors with the USPIS conducted a voluntary interview of ADEKANMI. During the interview, ADEKANMI identified herself as the individual depicted in the surveillance images referenced above.

14. Similar surveillance photos depict an individual matching co-conspirator Jato's appearance using Compromised Accounts at retail stores in the same general areas of Georgia.

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