

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.

Muritala Adeowo

Case No. 20-2081 (JS)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of in or about 6/2016 through 3/2020 in the county of Camden and Mercer in the
District of New Jersey, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 U.S.C. § 1349, Conspiracy to commit bank fraud. (See Attachment A.)

This criminal complaint is based on these facts:

See Attachment B, Affidavit of probable cause.

Continued on the attached sheet.

Michael Durocher

Complainant's signature

Michael R. Durocher, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/24/2020

Joel Schneider
Judge's signature
Hon. Joel Schneider, U.S. Magistrate Judge

City and state: Camden, NJ

Printed name and title

CONTENTS APPROVED  
UNITED STATES ATTORNEY

By:           *s/PATRICK C. ASKIN*            
          PATRICK C. ASKIN, AUSA

Date:           June 24, 2020

**Attachment A**

(Conspiracy to Commit Bank Fraud)

From in or about June 2016 through in or about March 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

**MURITALA ADEOWO**

did knowingly and intentionally conspire and agree with co-conspirators, and with others, known and unknown, to devise a scheme and artifice to defraud a financial institution, namely TD Bank and other victim banks, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Victim Bank # 1 and other victim banks, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344, as described in Attachment B.

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

## **ATTACHMENT B**

I, Michael Durocher, am a United States Postal Inspector assigned to the Philadelphia Division of the United States Postal Inspection Service (USPIS), have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation, as well as upon information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a Criminal Complaint against MURITALA Adeowo (hereafter "MURITALA"), I have not necessarily included each and every fact known to the Government concerning this investigation.

1. On or about August 16, 2017, a Victim Bank 1 Investigator contacted the USPIS concerning several bank accounts that were closed by Victim Bank 1 due to suspected fraudulent activity. A Victim Bank 1 representative made USPIS aware the accounts were opened using suspected fraudulent foreign passports and visas at Victim Bank 1 branches located in New Jersey and Pennsylvania. After the accounts were opened, the accounts had minimal activity during the first two months. Any initial activity consisted of Western Union, MoneyGram, US Postal money orders, or cash deposits. After the two-month period, individuals deposited large business checks into the account and quickly withdrew the funds either by ATM withdrawals or by purchasing money orders at various money order vendors such as grocery and discount store. Shortly after the checks were deposited, Victim Bank 1 began to receive

claims stating the checks were stolen and the payee section was altered to show someone that was not intended to receive the check. Although the payee on the check was altered, the amount on the check was not changed. By October 2017, this affiant identified over thirty (30) fraudulent accounts with a total exposure of approximately \$800,000 to several financial institutions.

2. In the initial stages of the investigation, this affiant discovered at least twenty seven (27) fraudulent bank accounts that were opened between July 2016 and March 2017. The accounts were opened at numerous financial institutions in the state of New Jersey under the assumed names of Wunmi Akrana, Emanuel Kuti, Olawale Johnson, Steven Akpan, Olawole Adefarasin, and Anthony Tunde Camara. In addition, law enforcement identified Co-Conspirator 1 as the individual that opened the Olawale Johnson and Anthony Tunde Camara accounts. As the investigation progressed and additional fraudulent accounts were identified, law enforcement discovered the pattern of activity moved from New Jersey to Pennsylvania, Rhode Island, and Maryland.

3. Between September 13, 2017 and September 14, 2017, this affiant contacted the payer on several checks suspected of being altered and deposited into accounts that were closed by the bank for suspected fraud. The interviews confirmed the payee's name was altered on all of the checks to reflect the name used on a fraudulent account. The accounts to which these checks were deposited were opened in the assumed names of Solomon Henry, Moussa Johnson Traore, Rasheed Williams, Banji Aiwanfo, and John Anoliefo.

4. This affiant examined the bank accounts referenced in paragraph 3 and discovered the accounts were opened using foreign passports, each containing United States Visas, which were believed to be counterfeit.

5. On or about November 17, 2017, this affiant met with Department of State - Diplomatic Security Service (DSS) to discuss the passports and United States Visas used to open the fraudulent bank accounts. A Special Agent (SA) from DSS confirmed the passports and United States Visas were counterfeit and the identifiers on the documents did not match any Consular records in the Department of State's systems.

6. In the Fall of 2017, this affiant was informed by a Victim Bank 1 investigator of a similar fraud scheme in Rhode Island that was being investigated by HSI Providence. This affiant contacted HSI Providence and was told about an individual known as "G4" who may be living in the Philadelphia, PA area. An image of "G4" was sent to this affiant by HSI Providence with "G4" in a social setting. In June of 2019, law enforcement recognized "G4" as MURITALA, who is the brother of Co-Conspirator 4. This affiant compared an image of "G4" to a Pennsylvania arrest photo of MURITALA and they were a match.

7. According to a source in the HSI Providence investigation, "G4" was a primary source to provide the counterfeit/altered checks in the bank fraud scheme. Further statements made by this source indicated "G4" knew someone in the Post Office. No specific branch information was provided. In

addition, "G4" knew someone that could wipe the name off of a real check and replace it with a fraudulent name so the check could be cashed using the fraudulent documents under the new name.

8. On or about June 27, 2019, USPIS, HSI, and DSS conducted surveillance at 119 E Providence Rd, Lansdowne, PA (hereafter "MURITALA RESIDENCE"). At approximately 11:49 am, law enforcement observed MURITALA leave the MURITALA RESIDENCE and enter a Toyota minivan with Pennsylvania registration KYE0759 and drive away.

9. On or about August 1, 2019, this affiant was contacted by a Postal Inspector from Philadelphia, PA concerning additional fraudulent accounts at Victim Bank 4. The Inspector stated he was reviewing documents and images of individuals opening fraudulent bank accounts under assumed names and depositing stolen checks into those accounts. This affiant reviewed several ATM photos and identified MURITALA depositing a stolen check at a Victim Bank 4 ATM. MURITALA deposited the check into a fraudulent account under the assumed name of James Weah.

10. After MURITALA was identified, law enforcement reviewed the data from Co-Conspirator 1's (3) cellphones that were imaged and seized on February 3, 2019. Law enforcement discovered images of MURITALA with Co-Conspirator 1 and sent those images to HSI Providence. An agent from HSI Providence confirmed MURITALA as the same "G4" their source referred to during their investigation. In addition, Co-Conspirator 1 listed MURITALA in

his phone contact list as “G4 Pocono”. MURITALA lived at 91 Saw Creek Rd, Bushkill, PA, which is in the Pocono region of Pennsylvania.

11. Further research on MURITALA revealed he had prior arrests in Massachusetts, Pennsylvania, and New York with convictions for identity theft, forgery, and other crimes.

12. Law enforcement did not discover any account openings for MURITALA during this investigation. However, law enforcement did obtain images, provided by Victim Bank 4, of MURITALA conducting a \$8,658.00 fraudulent transaction for the James Weah account, which is associated with co-conspirators in this investigation. The transaction is as follows:

<b><u>Date</u></b>	<b><u>Bank</u></b>	<b><u>Type of Transaction</u></b>	<b><u>Amount</u></b>	<b><u>Assumed Name</u></b>
5/13/2019	Wells Fargo	Deposit	\$8,658.00	James Weah

13. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that from in or about June 2016 to in or about March 2020, in the District of New Jersey and elsewhere, MURITALA conspired and agreed, with others, known and unknown to the United States, to commit bank fraud, contrary to Title 18, United States, Code, Section 1344, in violation of Title 18, United States Code, Section 1349.

14. To date, the investigation has revealed that the full extent of the criminal activity identified thus far involves approximately four hundred seventy (470) fraudulent bank accounts with an estimated exposure of \$5.7 million.

MURITALA conspired with individuals both known and unknown commit the federal offenses outlined in the aforementioned paragraph.

*Michael Durocher*

---

Michael R. Durocher  
U.S. Postal Inspector

Pursuant to F.R.Crim.P. 4.1, U.S. Postal Inspector Durocher was sworn and attested to the contents of this affidavit in support of the complaints.

*Joel Schneider*

---

HONORABLE JOEL SCHNEIDER  
United States Magistrate Judge

Date: June 24, 2020