

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.
Sulaiman Fola Dosunmu

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Case No. 20-2079 (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

City and state: Camden, NJ

Hon. Joel Schneider, U.S. Magistrate Judge

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,

SULAIMAN FOLA DOSUNMU

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 Sulaiman DOSUNMU (hereafter "DOSUNMU"), 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 United States Postal Inspection Service (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 United States Visas at Victim Bank 1 branches located in New Jersey and Pennsylvania. After they 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 stores. 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 DOSUNMU 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. On or about July 26, 2018, this affiant examined the documents of Victim Individual 1's Victim Bank 1 account ending in X3852. According to bank records received from Victim Bank 1, the account was created at a Victim Bank 1 branch in Boston, MA on February 9, 2018. An initial deposit of \$100.00 was used to open the account. From on or about March 7, 2018 through June 6, 2018, approximately \$48,465.71 in altered checks were deposited into the account. One of the deposits was an Internal Revenue Service (IRS) tax refund totaling \$8,162.00, which was direct deposited into the account. The IRS stated Victim Individual 1 was not the payee for the refund and someone fraudulently directed the deposit into the account. Due to the deposit and withdrawal activity of the account, Victim Bank 1 determined the account to be fraudulent and closed it on June 14, 2018. In addition, the account was opened with a fraudulent identification containing stolen personal identification information

(PII). Upon further review of Victim Individual 1's "Daily Account Activity", this affiant found two (2) purchases of USPS money orders in Boston, MA and one (1) purchase of USPS money orders in Cambridge, MA. Two of the USPS money orders were used for payments to a car auction company called Copart. The first money order, serial number 25113751694, was deposited on June 5, 2018 for \$1,000.00. The second money order, serial number 25113751705, was deposited on June 26, 2018 for \$985.00.

7. On or about August 7, 2018, this affiant spoke with a Copart representative to trace back who used the USPS money orders and what was purchased with the money orders. Copart records showed that on June 4, 2018, DOSUNMU of 110 Branford Rd, Darby, PA (hereafter "DOSUNMU RESIDENCE") purchased a 2005 Toyota Tundra bearing Vehicle Identification Number (VIN) 5TBDT48175S483464 at the Copart Philadelphia East Lot using USPS money order serial number 25113751694 for a Nigerian motor company called Abefe Sunday Motors. DOSUNMU used his Pennsylvania driver's license, ending in 3485, as identification, which also displayed the DOSUNMU RESIDENCE address. On June 25, 2018, DOSUNMU purchased a 2005 Nissan Altima, VIN 1N4AL11D05N43846, and a 2013 Lexus RX 350, VIN 2T2BK1BA7DC174461, at the Copart Glassboro East lot using USPS money order serial number 25113751705 for his personal company, Folly Business Services. Folly Business Services' address is also the DOSUNMU RESIDENCE. This affiant spoke with a Copart representative who indicated DOSUNMU purchased at least thirty (30) vehicles for Folly Business Services since January 2018.

8. After examination of the subpoenaed records from Copart, it was revealed DOSUNMU opened the Folly Business Services account on January 29, 2013. DOSUNMU used his Pennsylvania driver's license, ending in 3485, as proof of identification to open the account. From October 11, 2016 to July 5, 2018, Folly Business Services purchased approximately one hundred and eleven (111) vehicles for a total of \$229,300.00. DOSUNMU made forty-six (46) deposits into the Folly Business Services' Copart account for the purpose of purchasing vehicles, which totaled \$165,836.00. Per Copart policy, all individuals making deposits into a Copart account must present a valid form of identification. DOSUNMU presented his Pennsylvania driver's license for all forty-six (46) deposits and the information provided by Copart matched the records for DOSUNMU maintained by the Pennsylvania Department of Motor Vehicles.

9. On or about August 7, 2018, this affiant was informed by HSI the aforementioned 2013 Lexus RX 350 (VIN 2T2BK1BA7DC174461) was shipped to Lagos, Nigeria on or about July 13, 2018. The forwarding agent for the vehicle was AES INC.

10. On or about August 8, 2018, this affiant contacted HSI to assist with the investigation. A review of their databases revealed that DOSUNMU appeared in a HSI investigation out of Pittsburgh, PA. In the Pittsburgh investigation, two fraudulent Gambian passports destined for Altoona, PA were intercepted by United Kingdom Border Force ("UKBF") and sent to the HSI Pittsburgh Field Office for further investigation. The passports were addressed to Anthony

Camara¹ at 848 23rd St, Apt 4, Altoona, PA 16601. HSI Pittsburgh utilized the assistance of the HSI Forensic Lab to forensically analyze the documents. Through their analysis, the lab was able to identify the images on the documents as DOSUNMU and Co-Conspirator 2. The information discovered by the HSI analysts was compared to Pennsylvania Department of Motor Vehicle images of DOSUNMU and the identification was a match.

11. From on or about September 30, 2016 through March 23, 2017, bank records revealed DOSUNMU opened approximately sixteen (16) accounts under the assumed name Olawale Johnson, approximately fourteen (14) accounts under the assumed name Rasheed Williams, approximately five (5) accounts under the assumed name Anthony Tunde Camara for an estimated intended loss of \$414,380.45. DOSUNMU utilized fictitious West African passports in these assumed names bearing his image to open the aforementioned accounts. This affiant obtained copies of the above passports and video footage from the banks, which showed DOSUNMU as the individual that opened the accounts. They are listed below:

<u>Date of Account Opening</u>	<u>Bank</u>	<u>Account Numbers</u>	<u>Amount</u>	<u>Assumed Name</u>
9/30/2016	Victim Bank 1	X2631, X6559	\$11,812.50	Olawale Johnson
9/30/2016	Victim Bank 2	X1346, X1359	\$51,679.68	Olawale Johnson

¹ Note: Anthony Camara is one of the assumed names DOSUNMU used to open fraudulent bank accounts.

10/1/2016	Victim Bank 4	X4160, X0157	\$25,732.96	Olawale Johnson
10/1/2016	Victim Bank 6	X1816	\$1,900.00	Olawale Johnson
10/3/2016	Victim Bank 5	X2932, X7308, X7766	\$33,775.10	Olawale Johnson
10/8/2016	Victim Bank 3	X4743, X4751, X4778	\$38,136.36	Olawale Johnson
10/13/2016	Victim Bank 1	X2039, X4124	\$39,169.25	Rasheed Williams
10/13/2016	Victim Bank 7	X7402, X8768	\$8,100.25	Olawale Johnson
10/14/2016	Victim Bank 2	X8451, X8464	\$25,149.43	Rasheed Williams
10/14/2016	Victim Bank 5	X4860	\$30,451.85	Rasheed Williams
10/18/2016	Victim Bank 6	X9765, 7305	\$18.21	Rasheed Williams
10/18/2016	Victim Bank 4	X8065	\$33,600.28	Rasheed Williams
10/19/2016	Victim Bank 3	X7956, X7964, X7972	\$10,893.00	Rasheed Williams
10/21/2016	Victim Bank 7	X5168	\$0.00	Rasheed Williams
10/24/2016	Victim Bank 8	X2635, X5798	\$0.00	Rasheed Williams
11/12/2016	Victim Bank 8	X8805	\$17,580.98	Olawale Johnson
3/10/2017	Victim Bank 2	X1553	\$10,913.67	Anthony Tunde Camara

3/11/2017	Victim bank 5	X3036	\$25,238.95	Anthony Tunde Camara
3/13/2017	Victim Bank 1	X8361, X4293	\$23,653.46	Anthony Tunde Camara
3/23/2017	Victim Bank 4	X8532	\$26,574.52	Anthony Tunde Camara

Furthermore, law enforcement obtained images provided by the banks of DOSUNMU conducting approximately \$68,134.43 worth of transactions on the following additional fraudulent accounts:

<u>Date</u>	<u>Bank</u>	<u>Type of Transaction</u>	<u>Amount</u>	<u>Assumed Name</u>
6/1/2017	Victim Bank 3	Deposit	\$12,554.51	Stephen Mensah
6/8/2017	Victim Bank 3	Deposit	\$15,595.32	Stephen Mensah
6/21/2017	Victim Bank 3	Deposit	\$9,554.60	Olawole Adefarasin
8/26/2017	Victim Bank 1	Deposit	\$500.00	Olakunle Yeboah
9/1/2017	Victim Bank 1	Withdrawal	\$700.00	Olakunle Yeboah
9/2/2017	Victim Bank 1	Withdrawal	\$700.00	Olakunle Yeboah
9/3/2017	Victim Bank 1	Withdrawal	\$700.00	Olakunle Yeboah
9/4/2017	Victim Bank 1	Withdrawal	\$700.00	Olakunle Yeboah
9/15/2017	Victim Bank 1	Withdrawal	\$860.00	Olakunle Yeboah

9/23/2017	Victim Bank 1	Deposit	\$22,690.00	Olakunle Yeboah
11/21/2017	Victim Bank 2	Deposit	\$1,000.00	Dele Alasan
4/30/2018	Victim Bank 1	Deposit	\$500.00	Sophie P Kwasi
4/30/2018	Victim Bank 1	Deposit	\$80.00	Sophie P Kwasi
5/2/2018	Victim Bank 1	Deposit	\$1,000.00	Sophie P Kwasi
5/23/2018	Victim Bank 1	Deposit	\$1,000.00	Sophie P Kwasi

12. On February 3, 2019, DOSUNMU arrived into Newark International Airport on Ethiopian Airways flight 508 from Nigeria and was selected for a secondary examination by CBP. USPIS and HSI were present for the exam. DOSUNMU presented CBP with his United States passport, 501759544, which did not have stamps for his entry into Nigeria. CBP found DOSUNMU's Nigerian passport, A09740747, in his luggage. The passport was issued on November 15, 2018. DOSUNMU claimed three bags. CBP discovered several ledgers that were contained in his bags. A review of these ledgers revealed information relating to an inventory of expenses, banking information, document information, and co-conspirators in this investigation. DOSUNMU stated the ledgers were used to track and inventory his expenses and supplies on property he owned in Nigeria. This affiant discovered that one of the ledgers contained information connecting DOSUNMU to other co-conspirators in this investigation. In addition to the ledgers, CBP discovered five (5) cellular telephones, one (1) Asus tablet, and one

(1) Sandisk 16GB MicroSD Card. All items were imaged by a HSI Computer Forensic Agent and detained for further analysis.

13. On or about February 14, 2019, law enforcement seized three cellular phone images from the devices DOSUNMU possessed during his secondary exam for containing direct links to the fraud. Specifically, law enforcement discovered:

- a) Images of Co-Conspirator 7 and Co-Conspirator 8, along with their driver's license information which helped law enforcement identify them. Those images were compared to bank surveillance footage from transactions that related to the fraudulent bank accounts;
- b) Images of screenshots for several fraudulent bank accounts, which included the identifiers for the assumed name, bank account details, and the passwords and security questions necessary to access the accounts;
- c) Images of wire transfer receipts showing money being sent to Canada. The sender names on the receipts were the same assumed names used to open the fraudulent bank accounts;
- d) Additional fraudulent accounts not known to law enforcement;
- e) Banking information for accounts belonging to DOSUNMU in Nigeria.

14. In addition to the above findings, law enforcement recovered WhatsApp conversations of DOSUNMU communicating with two linked associates located overseas related to the bank and passport fraud. Specifically between August 17, 2016 and October 17, 2017, DOSUNMU communicated with an associate in Nigeria about the creation of fraudulent passports and provided the destination addresses for the fraudulent passports. DOSUNMU requested the creation of passports under the assumed names of Rasheed Williams, Adekunle Johnson, Olawale Johnson, Samuel Balewa, Stephen Mensah, and Mathew Adebowale and provided their corresponding identifiers. In addition, DOSUNMU requested the Nigerian associate mail the passports to Adewale Johnson at 1362 Elmwood Avenue, Sharon Hill, PA 19079. Per the Nigerian associate's request, DOSUNMU wired money to the Nigerian associate's Guaranty Trust Bank account for services rendered.

15. On or about June 6, 2019, USPIS, HSI, and DSS conducted surveillance at the DOSUNMU RESIDENCE. At approximately 10:33 am, law enforcement observed a silver Infiniti SUV bearing Pennsylvania registration LBG 3930 park at the rear of the DOSUNMU RESIDENCE. DOSUNMU exited the aforementioned vehicle and entered the DOSUNMU RESIDENCE.

16. In April 2019, this affiant requested the assistance of the HSI Attaché in Dakar to research the Nigerian bank accounts discovered on DOSUNMU's cellphones referenced in paragraph 13 and 14.

17. On or about September 18, 2019, HSI Dakar confirmed DOSUNMU has eleven (11) active accounts in Nigeria at First City Monument Bank,

Guaranty Trust Bank, Access Bank, and Diamond Bank. After a review of DOSUNMU's phones that were examined on or about February 3, 2019, law enforcement discovered several wire transfers between DOSUNMU's Nigerian bank accounts and other co-conspirators, to include Co-Conspirator 12.

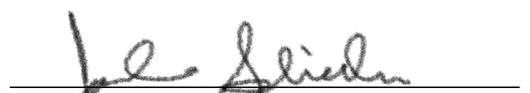
18. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that from in or about June 2016 to in or about March 2020, in the District of New Jersey and elsewhere, DOSUNMU conspired and agreed, with others, known and unknown to the United States,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

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



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.


HONORABLE JOEL SCHNEIDER
United States Magistrate Judge

Date: June 24, 2020