

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.
Babatunde Omotayo Oke
Defendant(s)

Case No. 20-2088 (JS)

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:

Code Section 18 U.S.C. § 1349 Offense Description 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
Hon. Joel Schneider, U.S. Magistrate Judge

Judge's signature

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,

**BABATUNDE OMOTAYO OKE**

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 Babatunde OKE (hereafter "OKE"), 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 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. During the summer of 2018, Co-Conspirator 1 was identified and linked to the use of funds from a fraud account, under assumed name Individual Victim 1, to purchase a money order. The money order was used to purchase a vehicle from Copart and ultimately, the vehicle was exported to Africa. Co-Conspirator 1 used his business profile and driver's license to conduct the purchase of the vehicle.

7. On or about August 8, 2018, this affiant contacted HSI to assist with the investigation. A review of their databases revealed that Co-Conspirator 1 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 Camara<sup>1</sup> 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 Co-Conspirator 1 and OKE. The information discovered by the HSI analysts was compared to Pennsylvania Department of Motor Vehicle images of OKE and the identification was a match. See below OKE's Pennsylvania driver's license image:



8. On or about February 2, 2018, HSI Pittsburgh linked a second seizure that was intercepted by Customs and Border Protection (CBP). CBP seized two fraudulent Gambian passports destined for Anthony Camara at 2209 Alfred Drive, Apt #A, Yeadon, PA. One individual depicted on the passport was identified as OKE. The other individual remains unidentified at this time.

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<sup>1</sup> Note: Anthony Camara is one of the assumed names Co-Conspirator 1 used to open fraudulent bank accounts.

9. On February 3, 2019, the co-conspirator referenced in paragraph 6 and 7 was confirmed to arrive into Newark International Airport on Ethiopian Airways flight 508 and was selected for a secondary examination by CBP. USPIS and HSI were present for the exam. Three (3) cellphones were imaged and seized by law enforcement for further analysis.

10. After analyzing the devices from the secondary examination, law enforcement discovered an image of a fraudulent Ghanaian passport under the assumed name of Olakunle Yeboah with OKE's image on the passport. In addition, a computer screenshot was located that listed the identifiers for the assumed name Olakunle Yeboah, the accounts and account numbers that were opened using the fraudulent Olakunle Yeboah Ghanaian passport, and the security answers for those accounts. The picture from the fraudulent Olakunle Yeboah Ghanaian passport is below:



11. From on or about April 1, 2017 through April 22, 2017, bank records revealed OKE opened approximately seven (7) accounts under the

assumed name Olakunle Yeboah for an estimated intended loss of \$134,402.86. OKE utilized a fictitious West African passport in the assumed name of Olakunle Yeboah bearing his image to open the aforementioned accounts. This affiant obtained a copy of the above passport and video footage from the banks, which showed OKE as the individual that opened the accounts. The accounts are listed below:

<b><u>Date of Account Opening</u></b>	<b><u>Bank</u></b>	<b><u>Account Numbers</u></b>	<b><u>Amount</u></b>	<b><u>Assumed Name</u></b>
4/1/2017	Victim Bank 3	X9333, X9341, X9368	\$32,480.33	Olakunle Yeboah
4/3/2017	Victim Bank 1	X7296 <sup>2</sup>	\$49,742.00	Olakunle Yeboah
4/11/2017	Victim Bank 4	X5523	\$14,588.51	Olakunle Yeboah
4/22/2017	Victim Bank 5	X8344	\$15,577.45	Olakunle Yeboah
4/22/2017	Victim Bank 2	X0679	\$22,014.60	Olakunle Yeboah

12. After reviewing of bank video footage from Victim Bank 1, law enforcement identified OKE and Co-Conspirator 1 sitting together while opening the Olakunle Yeboah account. An image of OKE and Co-Conspirator 1 is below:

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<sup>2</sup> OKE and Co-Conspirator 1 referenced in paragraph 6 and 7 were together when the Victim Bank 1 account was opened.

Digital Video Snapshot

Site: CB/PA/CHELTENHAM  
Camera Group: DVX 1  
Camera Name: IP CSR 3  
4/1/2017 11:55:32 AM (Eastern Daylight Time)



Capture Size: 800 x 600 pixels  
Device Network Name: MNAR1510V260  
Device Serial Number: AR1510V260  
Device Station ID: 233

13. On April 1, 2019, OKE arrived at Dulles International Airport from Nigeria and was selected for a secondary examination by CBP. OKE stated to CBP that he resided at 535 Reading Terrace, Landover, Maryland<sup>3</sup>. OKE had two (2) cellphones in his possession which were imaged by a HSI Computer Forensic Agent for analysis<sup>4</sup>. The images and data recovered from OKE's phone were reviewed and although no findings related to the fraudulent accounts were

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<sup>3</sup> The correct mailing address for 535 Reading Terrace, Landover, Maryland is 535 Reading Terrace, Hyattsville, MD 20785.

<sup>4</sup> The image recovered of OKE's electronic media was deleted.

found, the phones did have images of OKE with Co-Conspirator 9. Surveillance was conducted once OKE left the airport and law enforcement followed him to 535 Reading Terrace, Hyattsville, MD 20785.

14. On or about September 2, 2019, OKE and Co-Conspirator 9 were encountered at the Peace Bridge port of entry in Buffalo, NY by CBP. Both individuals stated they were returning from a three (3) day trip to Canada. When CBP asked how they knew each other, OKE said he and Co-Conspirator 9 met in 2010 because they were neighbors in Rhode Island. Co-Conspirator 9 stated he lived in Maryland and OKE also stated he resided in Maryland, specifically 535 Reading Terrace, Hyattsville, MD. Law enforcement reviewed the electronic media of Co-Conspirator 9 and discovered evidence of check and bank fraud in the Maryland area that occurred during 2019.

15. 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, OKE 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.

16. 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. OKE conspired with individuals both known and unknown to 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