

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.
Adekunle Kehinde Owolabi

Case No. 20-2089 (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,

ADEKUNLE KEHINDE OWOLABI

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 Adekunle Kehinde OWOLABI (hereafter "OWOLABI"), 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 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. In March of 2019, law enforcement was notified by the HSI Forensic Lab of a large group of individuals in Rhode Island involved in various bank fraud schemes with West African ties. On or about November 26, 2016, a parcel containing two fraudulent Nigerian passports with counterfeit US visas were seized at the DHL mail facility in Cincinnati, OH. The parcel was destined for 47 Somerset St, Providence, RI 02907. The destination address for the parcel was linked to OWOLABI through a public database available to law enforcement. Later in the investigation, law enforcement discovered OWOLABI was the owner of KBLOW Trucking, which listed 47 Somerset St, Providence, RI 02907 as the primary address for the business. OWOLABI was also known as "Kenny" OWOLABI. In addition, OWOLABI has convictions for forgery and identity theft relating to check fraud in both Massachusetts and Rhode Island.

7. On or about April 11, 2019, this affiant was contacted by a Victim Bank 1 investigator about an account the representative believed was linked to

the ongoing fraud investigation. Co-Conspirator 10's name was on the account's signature card and HSI provided an image of Co-Conspirator 10. Subsequently, law enforcement discovered the identifiers on Co-Conspirator 10's signature card was his true ID and not an assumed name. This affiant recognized him from bank photos related to the fraudulent accounts under investigation. Further examination of Co-Conspirator 10's bank records showed that he performed bank transactions with an individual from 9576 Muirkirk Rd, Laurel, MD 20708. Research of public databases available to law enforcement and Maryland Department of Motor Vehicle records showed the aforementioned address is the same address associated to OWOLABI.

8. In May of 2019, this affiant received an image of OWOLABI and compared OWOLABI's image to bank video footage related to the fraud. Law enforcement found several matches. According to a source in the HSI Providence investigation referenced in paragraph 6, OWOLABI allegedly had direct involvement in the theft and alteration of the checks used in the bank fraud.

9. On or about September 2, 2019, OWOLABI and Co-Conspirator 2 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, Co-Conspirator 2 said he and OWOLABI met in 2010 because they were neighbors in Rhode Island. OWOLABI also stated he is not currently employed. Based on the background information known about OWOLABI and Co-Conspirator 2 from this investigation, in addition to

their vague answers to the purpose of their trip and their possible ties to Black Axe, they were selected for an exam. The exam included a search of any luggage, their vehicle, and their electronic media (i.e. cellphones). Also, marijuana was found in the vehicle, which was seized by CBP. Co-Conspirator 2 and OWOLABI's cellphones were imaged by CBP and detained for further analysis by HSI.

10. On or about October 4, 2019, CBP turned over the media data from OWOLABI's cellphone to HSI. HSI reviewed the media data and discovered an image of sim cards with hand written phone numbers next to each sim card. A phone number corresponded to a fraudulent account associated not only with OWOLABI, but also to Co-Conspirator 6 and Co-Conspirator 10. In addition, numerous images of checks and account numbers on the device are associated with fraudulent bank accounts and stolen identities. Specifically, checks were identified with the names of Victim Individual 4, Victim Individual 5, Victim Individual 6, Victim Individual 7, and Victim Individual 8. Lastly, law enforcement found numerous bank deposit slips, purchase receipts from car auctions, and export documents related to KBLOW Trucking. KBLOW Trucking conducts business under the name "Kenny" OWOLABI.

11. On or about January 21, 2020, HSI conducted a telephonic interview with Victim Individual 4 concerning numerous checks in Victim Individual 4's name as referenced in paragraph 10. Victim Individual 4 stated he did not hold any accounts with Victim Bank 11, Victim Bank 9, or Victim Bank 12. In addition, Victim Individual 4 stated he had resided at the address on the checks, but he had not lived at that location in over twenty (20) years.

Furthermore, Victim Individual 4 stated the signatures on the back of the checks was not his signature.

12. On or about January 24, 2020, Victim Individual 4 contacted HSI to advice that when he ran his credit report, he saw two credit cards were taken out in his name at Victim Bank 12. The accounts were opened in May 2019 and June 2019. As a result, Victim Individual 4 contacted Victim Bank 12 and filed a fraud claim.

13. On or about April 28, 2020, this affiant and HSI conducted a telephonic interview with Victim Individual 6 concerning numerous checks in Victim Individual 6's name as referenced in paragraph 10. Victim Individual 6 stated he did not hold any accounts with Victim Bank 4. In addition, Victim Individual 6 stated he had resided at the address on the checks, but he had not lived at that location since approximately 2013. Lastly, Victim Individual 6 stated he did not know any of the names that appeared on the checks and electronic transfers on the bank statements, to include Victim Individual 4's name.

14. On or about April 28, 2020, this affiant and HSI conducted a telephonic interview with Victim Individual 7 concerning numerous checks in Victim Individual 7's name as referenced in paragraph 10. Victim Individual 7 stated he did not hold any accounts with Victim Bank 12. In addition, Victim Individual 7 stated he had never resided at the address on the checks. Lastly, Victim Individual 7 stated he did not know any of the names that appeared on the checks and electronic transfers on the bank statements. Victim Individual

7 was sent a copy of the signature from the checks in his name and he stated the signature was not his.

15. On or about April 28, 2020, this affiant and HSI conducted a telephonic interview with Victim Individual 8 concerning numerous checks in Victim Individual 7's name as referenced in paragraph 10. Victim Individual 7 stated he did not hold any accounts with Victim Bank 12. In addition, Victim Individual 7 stated he had never resided at the address on the checks. Lastly, Victim Individual 7 stated he did not know any of the names that appeared on the checks and electronic transfers on the bank statements. Victim Individual 7 was sent a copy of the signature from the checks in his name and he stated the signature was not his.

16. On or about April 29, 2020, Victim Individual 6 contacted this affiant and HSI because he notified Victim Bank 4 about the fraud in his name. Victim Bank 4 closed the accounts in Victim Individual 6's name and opened a fraud case.

17. From on or about September 8, 2016 to June 24, 2017, bank records and images revealed OWOLABI conducted approximately \$17,005.00 worth of transactions for several fraudulent accounts associated with co-conspirators in this investigation. Those transactions are as follows:

<u>Date</u>	<u>Bank</u>	<u>Type of Transaction</u>	<u>Amount</u>	<u>Assumed Name</u>
9/8/2016	Victim Bank 2	Withdrawal	\$2,100.00	Idowu Peters

9/9/2016	Victim Bank 2	Withdrawal	\$1,600.00	Idowu Peters
9/12/2016	Victim Bank 4	Deposit	\$20.00	Adaku Bello
10/31/2016	Victim Bank 4	Deposit	\$12,525.00	Adaku Bello
6/21/2017	Victim Bank 6	Withdrawal	\$300.00	Peter Rawlings
6/21/2017	Victim Bank 6	Withdrawal	\$20.00	Peter Rawlings
6/23/2017	Victim Bank 6	Account Balance Inquiry	\$0.00	Peter Rawlings
6/24/2017	Victim Bank 6	Withdrawal	\$340.00	Peter Rawlings
12/12/2019	Victim Bank 11	Deposit	\$100.00	Victim Individual 4

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, OWOLABI 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. OWOLABI 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