

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.

Olugbenga Oyedele

Case No. 20-2086 (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

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,

OLUGBENGA OYEDELE

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 OLUGBENGA Oyedele (hereafter "OLUGBENGA"), 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. During the summer of 2018, Co-Conspirator 1 was identified and linked to the use of funds from a fraud account, under assumed name Victim Individual 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 was informed that Co-Conspirator 1 and Co-Conspirator 2 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 individuals in the Gambian passports were identified as Co-Conspirator 1 and Co-Conspirator 2. The passports were addressed to Anthony Camara at 848 23rd St, Apt 4, Altoona, PA 16601.

8. During August 2018, law enforcement was made aware of an additional seizure of fraudulent passports that were intercepted by Customs and Border Protection (CBP) on or about February 2, 2018. The documents were destined for 2209 Alfred Drive, Apt #A, Yeadon, PA. Further research on this address revealed Co-Conspirator 3 resided at the aforementioned address and was associated with the 118 Branford Rd, Darby, PA residence¹.

9. During the investigation, research was conducted on the 118 Branford Rd address. Law enforcement discovered OLUGBENGA provided this address as his destination address when he traveled from Nigeria to the United States in March 2014. Law enforcement recovered an image of OLUGBENGA from DSS records of his US visa in March 2014, which matched bank video footage recovered from several fraudulent accounts; namely assumed names James Adigun, Kojo Stephen, and Olawole Adefarasin.

10. In addition to his travel to the United States, law enforcement discovered OLUGBENGA was the beneficiary in a marriage based petition filed by a United States Citizen ("USC"). The address listed in his file was the same as the destination address for the fraudulent passports referenced in paragraph 7. The application was denied in May 2018.

11. On February 3, 2019, Co-Conspirator 1 arrived into Newark International Airport on Ethiopian Airways flight 508 and was selected for a

¹ Co-Conspirator 3 is the brother of OLUGBENGA.

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.

12. After analyzing the devices from the secondary examination, law enforcement discovered an image of a fraudulent Ghanaian passport under the assumed name of Kojo Stephen with OLUGBENGA's image on the passport. In addition, law enforcement recovered two headshot images of OLUGBENGA, one of which appears to be have been used on the Kojo Stephen passport. Lastly, a computer screenshot was located that listed the identifiers for the assumed name Kojo Stephen, the accounts and account numbers that were opened using the fraudulent Kojo Stephen passport, and the security answers for those accounts.





13. From on or about July 12, 2016, through May 6, 2018, bank records revealed OLUGBENGA opened approximately 12 accounts under the assumed name James Adigun, seven (7) accounts under the assumed name Olawole Adefarisin, three (3) accounts under the assumed name Kojo Stephen, and one (1) account under the assumed name James Babagana for an estimated intended loss of \$314,648.35. OLUGBENGA utilized fictitious West African passports in these assumed names bearing his image. This affiant obtained copies of the passports used to open the accounts and video footage from the banks, which showed OLUGBENGA as the individual that opened the aforementioned accounts. The accounts are listed below:

<u>Date of Account Opening</u>	<u>Bank</u>	<u>Account Numbers</u>	<u>Amount</u>	<u>Assumed Name</u>
7/12/2016	Victim Bank 5	X8705, X1937	\$13,514.50	James Adigun

7/12/2016	Victim Bank 1	X9286, X2032	\$0.00	James Adigun
7/12/2016	Victim Bank 2	X2789, X2792	\$10,742.36	James Adigun
7/12/2016	Victim Bank 6	X4105, X1926	\$9,038.30	James Adigun
7/15/2016	Victim Bank 3	X1218, X1226, X1234	\$13,030.00	James Adigun
7/23/2016	Victim Bank 7	X6201	\$0.00	James Adigun
11/29/2016	Victim Bank 5	X3304, X2817	\$23,219.58	Olawole Adefarasin
11/29/2016	Victim Bank 1	X4089	\$18,260.44	Olawole Adefarasin
11/29/2016	Victim Bank 2	X0045	\$13,640.03	Olawole Adefarasin
12/1/2016	Victim Bank 4	X5952	\$33,115.21	Olawole Adefarasin
12/1/2016	Victim Bank 3	X8219	\$41,298.26	Olawole Adefarasin
12/5/2016	Victim Bank 8	X0929	\$7,989.87	Olawole Adefarasin
3/17/2017	Victim Bank 5	X8085	\$80,700.00 ²	Kojo Stephen
3/17/2017	Victim Bank 1	X5598	\$11,316.74	Kojo Stephen
3/17/2017	Victim Bank 4	X2806	\$17,783.06	Kojo Stephen
5/6/2018	Victim Bank 1	X4767	\$21,000.00	James Babagana

² A personal check, totaling \$24,950.00, was deposited into the Kojo Stephen Victim Bank 5 account X8085 from Victim Bank 3 account X2889 under the assumed name of Lero Payo. The Lero Payo Victim Bank 3 account X2889 is also a fraudulent account used by the co-conspirators to deposit stolen checks.

Furthermore, law enforcement obtained images provided by the banks of OLUGBENGA conducting approximately \$163,965.67 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>
11/9/2016	Victim Bank 1	Deposit	\$12,744.00	Emanuel Kuti
3/28/2017	Victim Bank 1	Deposit	\$14,495.00	Rasheed Williams
4/25/2017	Victim Bank 1	Deposit	\$10,452.00	Stephen Mensah
5/9/2017	Victim Bank 1	Deposit	\$14,873.25	Stephen Mensah
8/28/2017	Victim Bank 1	Deposit	\$11,360.10	Anthony K Sarkodee
8/28/2017	Victim Bank 1	Deposit	\$500.00	Olakunle Yeboah
8/28/2017	Victim Bank 1	Deposit	\$14,062.00	Olakunle Yeboah
5/6/2018	Victim Bank 1	Deposit	\$40.00	James Kunle Babagana
5/25/2018	Victim Bank 1	Deposit	\$995.00	Sophie P Kwasi
5/28/2018	Victim Bank 1	Withdrawal	\$700.00	Sophie P Kwasi
5/31/2018	Victim Bank 1	Deposit	\$25,110.32	Victim Individual 1
7/3/2018	Victim Bank 1	Deposit	\$200.00	James Kunle Babagana
7/5/2018	Victim Bank 1	Deposit	\$1,000.00	James Kunle Babagana

7/14/2018	Victim Bank 1	Withdrawal	\$700.00	James Kunle Babagana
7/16/2018	Victim Bank 1	Withdrawal	\$200.00	James Kunle Babagana
7/16/2018	Victim Bank 1	Deposit	\$21,000.00	James Kunle Babagana
7/25/2018	Victim Bank 1	Deposit	\$600.00	Victim Individual 2
7/27/2018	Victim Bank 1	Deposit	\$20,412.00	Victim Individual 2
7/17/2019	Victim Bank 1	Deposit	\$14,522.00	David Francis

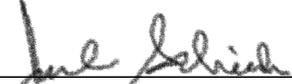
14. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that from in or about June 2016 to in or about March 2020, in the District of New Jersey and elsewhere, OLUGBENGA conspired and agreed, with others, known and unknown to the United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

15. 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. OLUGBENGA 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.



HONORABLE JOEL SCHNEIDER
United States Magistrate Judge

Date: June 24, 2020