

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.
Rafiat Adesubomi Sarumi

Case No. 20-2085 (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,

RAFIAT ADESUBOMI SARUMI

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 Rafiat SARUMI (hereafter "SARUMI"), 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.

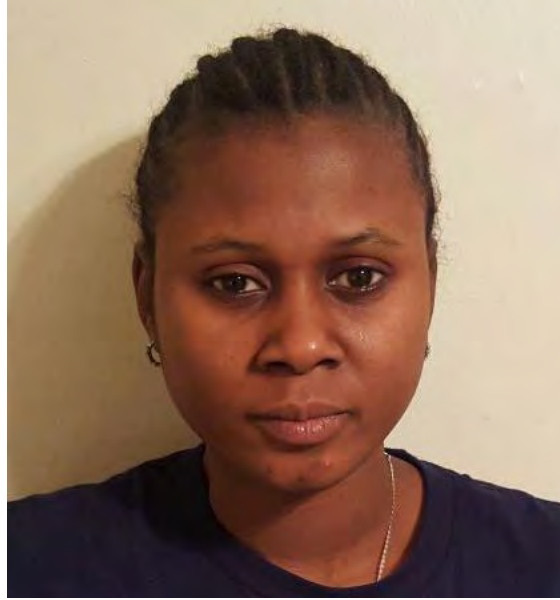
4. This affiant examined the bank accounts referenced in paragraph 3 and discovered the accounts were opened using foreign passports, each containing United States Visas, which were believed to be counterfeit.

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. On February 3, 2019, Co-Conspirator 1 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.

7. After analyzing the devices from the secondary examination, law enforcement recovered an image of Pennsylvania driver's license number ending in 7176 with SARUMI's identifiers. In addition, numerous images were discovered that showed SARUMI and Co-Conspirator 1 in social settings. Furthermore, an image of SARUMI was discovered that matched the same image on the fraudulent Ghanaian passport used to open the Sophie Kwasi accounts¹.

¹ The attached Sophie Kwasi passport image was provided by Victim Bank 5 for account ending in X8801.



Passport/Passeport



8. From on or about March 26, 2018 through April 14, 2018, bank records revealed that SARUMI opened approximately four (4) accounts under the assumed name Sophie Kwasi for an estimated intended loss of \$50,898.77. This affiant obtained copies of the above passports and video footage from the

banks, which showed SARUMI as the individual that opened the accounts.

Those accounts are listed below:

<u>Date of Account Opening</u>	<u>Bank</u>	<u>Account Numbers</u>	<u>Amount</u>	<u>Assumed Name</u>
3/26/2018	Victim Bank 1	X0776	\$26,646.20	Sophie Kwasi
4/14/2018	Victim Bank 4	X3101	\$13,968.02	Sophie Kwasi
4/14/2018	Victim Bank 2	X5065	\$10,284.55	Sophie Kwasi
4/14/2018	Victim Bank 5	X8801	\$0.00	Sophie Kwasi

Furthermore, law enforcement obtained images provided by Victim Bank 1 of SARUMI on the date she opened the X0776 account. The images also show Co-Conspirator 1 accompanied SARUMI while opening the Victim Bank 1 account.



9. 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, SARUMI 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.

10. 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. SARUMI 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