2021R01144/PCA

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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| UNITED STATES OF AMERICA | : | Hon. |
| v. | : | Criminal No. 22- |
| AYANNIYI K. ALAYANDE | : | 18 U.S.C. § 1349 |

**INFORMATION**

**(Conspiracy to Commit Bank Fraud)**

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

From in or about June 2016 through in or about June 2020, in Camden and Mercer County, in the District of New Jersey, and elsewhere, the defendant,

AYANNIYI K. ALAYANDE

knowingly and intentionally conspired and agreed with others to execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain monies, funds, assets and other property owned by, and under the custody and control of, such financial institution, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

**FORFEITURE ALLEGATION**

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

2. The United States hereby gives notice to AYANNIYI K. ALAYANDE, that upon his conviction of the offense charged in this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offense to forfeit any property constituting or derived from proceeds obtaining directly or indirectly as a result of the offense charged in this Information, including, but not limited to, the following property:

    a. $99,770 in Western Union money orders seized on June 25, 2020 from Snapbox Self Storage Unit 4100, 2240 Island Avenue, Philadelphia, Pennsylvania.

3. If any of the property described above, as a result of any act or omission of the defendant:

    a. Cannot be located upon the existence of due diligence;

    b. Has been transferred or sold to, or deposited with, a third party;

    c. Has been placed beyond the jurisdiction of the Court;

    d. Has been substantially diminished in value; or

    e. Has been comingled with other property which cannot be divided without difficulty, It is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in paragraph 2.

PHILIP R. SELLINGER
United States Attorney