

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
 - v. - :
 :
OLUWASEUN ADELEKAN, :
 a/k/a "Sean Adelekan," :
OLALEKAN DARAMOLA, :
SOLOMON ABUREKHANLEN, :
GBENGA OYENEYIN, :
ABIOLA OLAJUMOKE, :
TEMITOPE OMOTAYO, :
BRYAN EADIE, :
ALBERT LUCAS, and :
ADEMOLA ADEBOGUN, :
 :
Defendants. :
 :
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SEALED INDICTMENT
19 Cr.

19 CRIM 291

COUNT ONE

(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

Overview

1. From at least in or about July 2016, up to and including the present, OLUWASEUN ADELEKAN, a/k/a "Sean Adelekan," OLALEKAN DARAMOLA, SOLOMON ABUREKHANLEN, GBENGA OYENEYIN, ABIOLA OLAJUMOKE, TEMITOPE OMOTAYO, BRYAN EADIE, ALBERT LUCAS, and ADEMOLA ADEBOGUN, the defendants, a co-conspirator not named as a defendant herein ("CC-1"), and others known and unknown, participated in a scheme to defraud businesses and individuals (the "Victims") by using false and

misleading representations and omissions to induce the Victims to wire a total of more than \$3.5 million to the defendants and other members of the scheme.

2. As part of OLUWASEUN ADELEKAN's, a/k/a "Sean Adelekan," OLALEKAN DARAMOLA's, SOLOMON ABUREKHANLEN's, GBENGA OYENEYIN's, ABIOLA OLAJUMOKE's, TEMITOPE OMOTAYO's, BRYAN EADIE's, ALBERT LUCAS's, and ADEMOLA ADEBOGUN's, the defendants' scheme, various means and methods were used to make false and misleading representations and omissions to the Victims, including but not limited to the following:

a. Victims were sent email messages that appeared to be, but were not, from legitimate business counterparties ("Legitimate Business Counterparties"). The emails included instructions to the Victims to wire payment into bank accounts that appeared to be for the benefit of the Legitimate Business Counterparties, but were actually under the control of the defendants and other members of the scheme;

b. At least one Victim ("Victim-1") received email messages, text messages, and telephone calls offering Victim-1 the opportunity to invest in oil, on the condition that Victim-1 wire upfront payments into bank accounts purportedly affiliated with the oil investment opportunity but actually opened by and under the control of ABUREKHANLEN, OLAJUMOKE, and OYENEYIN; and

c. At least one Victim ("Victim-2") received email

messages, text messages, and telephone calls from an individual purporting to be a female with romantic intentions towards Victim-2 and requesting that Victim-2 wire payment into a bank account further to establishing a romantic relationship when, in fact, that bank account was actually opened by and under the control of OMOTAYO.

3. The bank accounts into which the Victims were instructed to wire payments were opened and maintained by OLUWASEUN ADELEKAN, a/k/a "Sean Adelekan," OLALEKAN DARAMOLA, SOLOMON ABUREKHANLEN, GBENGA OYENEYIN, ABIOLA OLAJUMOKE, TEMITOPE OMOTAYO, BRYAN EADIE, ALBERT LUCAS, and ADEMOLA ADEBOGUN, the defendants, in the names of shell companies, of the defendants, or of other scheme participants. The shell companies created by the defendants and used to open bank accounts into which proceeds of the fraud were transferred include, but are not limited to the following:

a. A shell company ("Trading Company-1"), which ADELEKAN purported to create in or about July 2016 and used to open at least one bank account in the Bronx, New York, into which proceeds of the fraud were wired;

b. A shell company ("Shell Company-1"), which DARAMOLA purported to create in or about 2017 and used to open at least two bank accounts into which proceeds of the fraud were wired by co-conspirators, including CC-1;

c. A shell company ("Environmental Company-1"), which ABUREKHANLEN purported to create in or about December 2016 and used to open at least one bank account in Yonkers, New York, into which proceeds of the fraud were wired;

d. A shell company ("Shell Company-2"), which OLAJUMOKE purported to create in or about 2017 and used, with assistance from OYENEYIN, to open at least one bank account into which proceeds from the fraud were wired and out of which proceeds from the fraud were transferred to foreign bank accounts;

e. A shell company ("Services Company-1"), which OMOTAYO purported to create in or about May 2017 and used to open at least one bank account in the Bronx, New York, into which proceeds of the fraud were wired and out of which proceeds were transferred to DARAMOLA via an account DARAMOLA opened under the name of Shell Company-1 (see ¶ 3.b, *supra*);

f. A shell company ("Shell Company-3"), over which EADIE purported to have authority and control in or about April 2018 and used to open at least one bank account in the Bronx, New York, into which proceeds of the fraud were wired;

g. A shell company ("Global Company-1"), which LUCAS purported to create in or about November 2016 and used to open at least one bank account into which proceeds of the fraud were wired; and

h. A shell company opened by CC-1 ("CC Shell Company-1"), which CC-1 purported to create in or about August 2017 and used to open at least one bank account in the Bronx, New York, into which proceeds of the fraud were wired. ADEBOGUN assisted CC-1 maintain CC Shell Company-1 by helping to provide CC-1, and instructing CC-1 to provide a bank, fraudulent invoices as a means of legitimizing CC Shell Company-1.

Statutory Allegation

4. From at least in or about July 2016 up to and including at least in or about the present, in the Southern District of New York and elsewhere, OLUWASEUN ADELEKAN, a/k/a "Sean Adelekan," OLALEKAN DARAMOLA, SOLOMON ABUREKHANLEN, GBENGA OYENEYIN, ABIOLA OLAJUMOKE, TEMITOPE OMOTAYO, BRYAN EADIE, ALBERT LUCAS, and ADEMOLA ADEBOGUN, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

5. It was a part and object of the conspiracy that OLUWASEUN ADELEKAN, a/k/a "Sean Adelekan," OLALEKAN DARAMOLA, SOLOMON ABUREKHANLEN, GBENGA OYENEYIN, ABIOLA OLAJUMOKE, TEMITOPE OMOTAYO, BRYAN EADIE, ALBERT LUCAS, and ADEMOLA ADEBOGUN, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise

a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

6. As a result of committing the offense alleged in Count One of the Indictment, OLUWASEUN ADELEKAN, a/k/a "Sean Adelekan," OLALEKAN DARAMOLA, SOLOMON ABUREKHANLEN, GBENGA OYENEYIN, ABIOLA OLAJUMOKE, TEMITOPE OMOTAYO, BRYAN EADIE, ALBERT LUCAS, and ADEMOLA ADEBOGUN, the defendants, shall forfeit to the United States, pursuant to United States Code, Sections 981(a)(1)(C) and 982(a)(2), any and all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

7. If any of the above-described forfeitable property, as

a result of any act or omission of the defendants:

- a. cannot be located upon the exercise 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 commingled 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), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981;
Title 21, United States Code, Section 853;
Title 28, United States Code, Section 2461.)



Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

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(18 U.S.C. § 1349)

GEOFFREY S. BERMAN
United States Attorney

