

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ADEDAYO JOHN,
OLUWADAMILOLA AKINPELU,
KAZEEM RAHEEM,
MORAKINYO GBEYIDE,
WARRIS ADENUGA,
a/k/a "Blue,"
SMART AGUNBIADE,
LATEEF GOLOBA,
SAMSONDEEN GOLOBA,
OLAWALE OLANIYAN,
OLAWOYIN PETER OLAREWAJU, and
EMMANUEL ORONSAYE-AJAYI,

Defendants.

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21 CRIM 609

SEALED INDICTMENT

21 Cr.

COUNT ONE
(Money Laundering Conspiracy)

The Grand Jury charges:

Background

1. At all times relevant to this Indictment, ADEDAYO JOHN, OLUWADAMILOLA AKINPELU, KAZEEM RAHEEM, MORAKINYO GBEYIDE, WARRIS ADENUGA, a/k/a "Blue," LATEEF GOLOBA, SAMSONDEEN GOLOBA, OLAWALE OLANIYAN, OLAWOYIN PETER OLAREWAJU, and EMMANUEL ORONSAYE-AJAYI, the defendants, and others known and unknown, were members of a criminal enterprise (the "Enterprise") that has committed a series of frauds, primarily business email compromises and romance

scams, against individuals and businesses located across the United States, including in the Southern District of New York.

Overview of the Conspiracy

2. The objective of the Enterprise's business email compromise fraud scheme was to trick businesses into transferring funds into accounts controlled by the Enterprise. Members of the Enterprise generally carried out the scheme in one of two ways. One method members of the Enterprise used was to compromise actual email accounts of employees of a victim company or third parties engaged in business with a victim company. The other method, which was sometimes used in conjunction with compromising email accounts, was to create email accounts with slight variations of email accounts used by employees of a victim company or third parties engaged in business with a victim company, in order to "spoof" or impersonate those employees or third parties. These fake email accounts were specifically designed to trick other employees of the company or third parties engaged in business with a victim company into thinking the fake email accounts were authentic.

3. The compromised email accounts and fake email accounts were used to send instructions to transfer funds via wire, ACH, cashier's check, or other means to certain bank accounts under Enterprise control. By utilizing this method of deception, the

Enterprise sought to trick the victims into transferring millions of dollars to bank accounts the victims believed were under the control of legitimate recipients of the funds as part of normal business operations, when in fact the bank accounts were under the control of members of the Enterprise.

4. The Enterprise conducted the romance scams primarily by using electronic messages sent via email, text messaging, social media, or online dating websites that deceived the victims, many of whom were vulnerable, older men and women, into believing the victims were in romantic relationships with fake identities assumed by members of the Enterprise. Once members of the Enterprise gained the trust of the victims using the fake identities, they used false pretenses to cause the victims to transfer funds via wire, ACH, cashier's check, or other means to bank accounts the victims believed were controlled by their romantic partners or to bank accounts of third parties whom the victims believed were assisting their romantic partners, when in fact the bank accounts were controlled by members of the Enterprise. At times, members of the Enterprise also induced victims to receive fraudulent proceeds in the victims' own bank accounts and to subsequently transfer those funds to bank accounts under the control of members of the Enterprise.

5. As a result of these frauds, more than 50 victims transferred more than \$9 million to bank accounts under the control of members of the Enterprise.

Statutory Allegations

6. From at least in or about January 2019 up to and including the present, in the Southern District of New York and elsewhere, ADEDAYO JOHN, OLUWADAMILOLA AKINPELU, KAZEEM RAHEEM, MORAKINYO GBEYIDE, WARRIS ADENUGA, a/k/a "Blue," LATEEF GOLOBA, SAMSONDEEN GOLOBA, OLAWALE OLANIYAN, OLAWOYIN PETER OLAREWAJU, and EMMANUEL ORONSAYE-AJAYI, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

7. It was a part and object of the conspiracy that ADEDAYO JOHN, OLUWADAMILOLA AKINPELU, KAZEEM RAHEEM, MORAKINYO GBEYIDE, WARRIS ADENUGA, a/k/a "Blue," LATEEF GOLOBA, SAMSONDEEN GOLOBA, OLAWALE OLANIYAN, OLAWOYIN PETER OLAREWAJU, and EMMANUEL ORONSAYE-AJAYI, the defendants, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of

specified unlawful activity, to wit, wire fraud schemes including business email compromises and romance scam frauds, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

COUNT TWO
(Conspiracy to Commit Bank Fraud)

The Grand Jury further charges:

8. From at least in or about November 2018 up to and including the present, in the Southern District of New York and elsewhere, ADEDAYO JOHN, OLUWADAMILOLA AKINPELU, MORAKINYO GBAYIDE, WARRIS ADENUGA, a/k/a "Blue," SMART AGUNBIADE, LATEEF GOLOBA, SAMSONDEEN GOLOBA, OLAWOYIN PETER OLAREWAJU, and EMMANUEL ORONSAYE-AJAYI, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

9. It was part and object of the conspiracy that ADEDAYO JOHN, OLUWADAMILOLA AKINPELU, MORAKINYO GBAYIDE, WARRIS ADENUGA, a/k/a "Blue," SMART AGUNBIADE, LATEEF GOLOBA, SAMSONDEEN GOLOBA, OLAWOYIN PETER OLAREWAJU, and EMMANUEL ORONSAYE-AJAYI, the

defendants, and others known and unknown, willfully and knowingly, would and did 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 money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

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

COUNT THREE
(Aggravated Identity Theft)

The Grand Jury further charges:

10. From at least in or about April 2020, up to and including the present, in the Southern District of New York and elsewhere, MORAKINYO GBEYIDE, the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, GBEYIDE controlled and transacted in a bank account in another person's name, including by using that person's name, date of birth, and taxpayer identification number,

during and in relation to the conspiracy to commit bank fraud charged in Count Two of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

FORFEITURE ALLEGATIONS

11. As a result of committing the offense alleged in Count One of this Indictment, ADEDAYO JOHN, OLUWADAMILOLA AKINPELU, KAZEEM RAHEEM, MORAKINYO GBEYIDE, WARRIS ADENUGA, a/k/a "Blue," LATEEF GOLOBA, SAMSONDEEN GOLOBA, OLAWALE OLANIYAN, OLAWOYIN PETER OLAREWAJU, and EMMANUEL ORONSAYE-AJAYI, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and the following specific property:

a. One 2021 Mercedes-Benz GLE53C4 bearing VIN 4JGFD6BBXMA324696; and

b. One 2021 Mercedes-Benz CLA250C4 bearing VIN W1k5J4HB2MN165143 (together, the "Specific Property").

12. As a result of committing the offense alleged in Count Two of this Indictment, ADEDAYO JOHN, OLUWADAMILOLA AKINPELU, MORAKINYO GBEYIDE, WARRIS ADENUGA, a/k/a "Blue," SMART

AGUNBIADE, LATEEF GOLOBA, SAMSONDEEN GOLOBA, OLAWOYIN PETER OLAREWAJU, and EMMANUEL ORONSAYE-AJAYI, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of 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 and the Specific Property described in paragraph 10 above.

SUBSTITUTE ASSETS PROVISION

13. 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 person;

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 subdivided 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 above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



AUDREY STRAUSS
United States Attorney

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(18 U.S.C. §§ 1956(h), 1349,
1028A(a)(1), 1028A(b), and 2.)

AUDREY STRAUSS

United States Attorney


Foreperson
