

York State in an effort to fraudulently obtain medical equipment, including defibrillators.

2. FATADE IDOWU OLAMILEKAN, a/k/a "Fatade Olamilekan Idowu," a/k/a "Olamilekan Idowu Fatade," a/k/a "Idowu Fatade," the defendant, engaged in the following conduct to carry out his criminal scheme:

a. First, OLAMILEKAN engaged in extensive research to identify specific procurement officials of U.S. state and local governments and educational institutions to impersonate and U.S. suppliers of medical, laboratory, and computer equipment to target as part of the scheme. This research included obtaining information about the current suppliers to the state and local governments and educational institutions OLAMILEKAN sought to impersonate and targeting those suppliers in order to avoid arousing suspicion. For example, OLAMILEKAN appears to have specifically targeted a medical supplier that was already providing medical equipment to New York State in order to avoid suspicion when OLAMILEKAN, who was impersonating the Chief Procurement Officer of New York State, contacted the supplier to obtain medical equipment.

b. Second, after OLAMILEKAN identified procurement officials to impersonate, he used aliases and a Lithuanian web hosting company to register email accounts with domains that had slight variations from the legitimate email accounts used by

procurement officials in order to "spoof" or impersonate those officials' email accounts (the "spoofed emailed accounts"). The spoofed email accounts used by OLAMILEKAN usually had the same username as the procurement official's email account but added an extra letter or common domain name to the domain of the email account. For example, in seeking to impersonate the email account of the Chief Procurement Officer of New York State, OLAMILEKAN utilized email accounts with domains such as "@ognssny-gov.us" to spoof the actual domain of "@ogs.ny.gov." These spoofed email accounts were therefore specifically designed to trick suppliers to impersonated procurement officials into thinking the spoofed email accounts were authentic. In total, OLAMILEKAN registered and used spoofed email accounts impersonating at least (i) eight different procurement officials of state and local governments in California, Illinois, Minnesota, New York, North Carolina, Pennsylvania, Texas, and Vermont ("Individual-1" through "Individual-8"); and (ii) three procurement officials of educational institutions located in Georgia and New York ("Individual-9" through "Individual-11").

c. Third, OLAMILEKAN used the spoofed email accounts to send emails impersonating the procurement official and seeking quotes for medical, laboratory, and computer equipment from targeted suppliers. These emails typically indicated that

the payment terms would be "net 30 days," which is a standard term of trade credit for government and educational entities that only requires payment for the goods within 30 days of delivery. OLAMILEKAN therefore impersonated the identities of procurement officials of government entities and educational institutions in order to exploit this industry standard and fraudulently obtain equipment without providing any advance payment information or deposit prior to delivery of the equipment.

d. Finally, once OLAMILEKAN received a response from a targeted supplier, he provided the supplier with a purchase order containing the forged signature of the impersonated procurement official and an address for a warehouse located in the United States for delivery and storage of the equipment purchased. Once the purchased items shipped to the warehouse provided by OLAMILEKAN, he typically had the warehouse re-ship the items to another warehouse and, ultimately, from the United States to locations in Australia, the United Kingdom, and/or Nigeria. OLAMILEKAN also coordinated with the warehouses receiving the shipments from the targeted suppliers using the stolen identity of at least one U.S. resident ("Individual-12"), thereby further concealing his own identity and avoiding detection of his criminal activity. Because payment was not due to the suppliers until 30 days after delivery of the equipment,

OLAMILEKAN was able to take possession of the equipment prior to detection of the fraud, which typically occurred after payment was not received by the supplier within the 30-day period.

STATUTORY ALLEGATIONS

3. From at least in or about 2018 through at least on or about September 14, 2020, in the Southern District of New York and elsewhere, FATADE IDOWU OLAMILEKAN, a/k/a "Fatade Olamilekan Idowu," a/k/a "Olamilekan Idowu Fatade," a/k/a "Idowu Fatade," the defendant, who will first be brought to and arrested in the Southern District of New York, 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, knowingly 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, to wit, OLAMILEKAN engaged in a scheme to impersonate, among other individuals, procurement officials of U.S. state and local governments and educational institutions in order to fraudulently obtain medical equipment, laboratory products, computer equipment and hardware, and other

merchandise, including through emails transmitted in interstate and foreign commerce to, among other locations, the Southern District of New York.

(Title 18, United States Code, Sections 1343, 3238, 3559(g), and 2.)

COUNT TWO
(Interstate Transportation of Stolen Property)

The Grand Jury further charges:

4. The allegations set forth in paragraphs 1 and 2 are realleged and incorporated by reference as if fully set forth herein.

5. From at least in or about 2018 through at least on or about September 14, 2020, in the Southern District of New York and elsewhere, FATADE IDOWU OLAMILEKAN, a/k/a "Fatade Olamilekan Idowu," a/k/a "Olamilekan Idowu Fatade," a/k/a "Idowu Fatade," the defendant, who will first be brought to and arrested in the Southern District of New York, willfully and knowingly transported, transmitted and transferred in interstate and foreign commerce goods, wares, merchandise, securities and money, of the value of \$5,000 and more, knowing the same to have been stolen, converted and taken by fraud, to wit, OLAMILEKAN directed the transportation of merchandise obtained through fraud, which was valued at more than \$5,000, to and from

locations in the United States, including New York, to locations abroad, including Nigeria.

(Title 18, United States Code, Sections 2314, 3238, 3559(g), and 2.)

COUNT THREE THROUGH COUNT FOURTEEN
(Aggravated Identity Theft)

The Grand Jury further charges:

6. The allegations set forth in paragraphs 1 and 2 are realleged and incorporated by reference as if fully set forth herein.

7. From at least in or about 2018 through at least on or about September 14, 2020, in the Southern District of New York and elsewhere, FATADE IDOWU OLAMILEKAN, a/k/a "Fatade Olamilekan Idowu," a/k/a "Olamilekan Idowu Fatade," a/k/a "Idowu Fatade," the defendant, who will first be brought to and arrested in the Southern District of New York, 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, OLAMILEKAN used the name and identity of the individuals specified below to fraudulently obtain merchandise during and in relation to the wire fraud offense charged in Count One of this Indictment:

COUNT	IDENTITY
THREE	Individual-1, Procurement Official, California
FOUR	Individual-2, Procurement Official, Illinois
FIVE	Individual-3, Procurement Official, Minnesota
SIX	Individual-4, Procurement Official, New York
SEVEN	Individual-5, Procurement Official, North Carolina
EIGHT	Individual-6, Procurement Official, Pennsylvania
NINE	Individual-7, Procurement Official, Texas
TEN	Individual-8, Procurement Official, Vermont
ELEVEN	Individual-9, employee of university in New York ("University-1")
TWELVE	Individual-10, employee of university in New York ("University-2")
THIRTEEN	Individual-11, employee of university in Georgia ("University-3")
FOURTEEN	Individual-12

(Title 18, United States Code, Sections 1028A(a) (1), (b) and (c) (5), 3238, and 2.)

FORFEITURE ALLEGATIONS

8. As the result of committing the offense charged in Count One of this Indictment, FATADE IDOWU OLAMILEKAN, a/k/a "Fatade Olamilekan Idowu," a/k/a "Olamilekan Idowu Fatade," a/k/a "Idowu Fatade," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a) (1) (C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that 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.

9. As a result of committing the offense alleged in Count Two of this Indictment, FATADE IDOWU OLAMILEKAN, a/k/a "Fatade

Olamilekan Idowu," a/k/a "Olamilekan Idowu Fatade," a/k/a "Idowu Fatade," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that 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 Assets Provision

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

- 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, to seek forfeiture of any other property of

the defendant up to the value of the forfeitable property described above.

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


FOREPERSON


AUDREY STRAUSS
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

FATADE IDOWU OLAMILEKAN,
a/k/a "Fatade Olamilekan Idowu,"
a/k/a "Olamilekan Idowu Fatade,"
a/k/a "Idowu Fatade,"

Defendant.

SEALED INDICTMENT

20 Cr.

(18 U.S.C. §§ 1343, 2314, 1028A, and 2.)

AUDREY STRAUSS

Acting United States Attorney


Foreperson
