

FILED

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
V.)	CAUSE NO. 1:22-cr-00099-TWP-DLP
)	
OLUWATOBI SENSI SETON,)	
)	
Defendant.)	

INFORMATION

The United States Attorney charges that:

General Allegations

At times material to this Information:

1. OLUWATOBI SENSI SETON (“SETON”) was a citizen of Nigeria who resided in Bloomington, Indiana.

2. The “Benefit Victims” were hundreds of individuals residing in locations throughout the United States, whose personally identifiable information was used by SETON and her conspirators to apply for unemployment and other state and federal benefits without the knowledge and authorization of these individuals.

3. The “GoBank Victims” were hundreds of individuals residing in locations throughout the United States, whose personally identifiable information was used by SETON and her conspirators to open and register prepaid debit cards and related accounts at GoBank, a financial institution, which were used to receive the unemployment and other state and federal

benefits applied for in the names of the Benefit Victims, all without the GoBank Victims' knowledge and authorization.

4. The term, personally identifiable information ("PII"), as used herein, refers to any information related to identifying a person, including but not limited to their name, date of birth, and social security number.

Count One

Conspiracy to Commit Wire Fraud
(Title 18, United States Code, Section 1349)

5. Paragraphs 1 through 4 are re-alleged and incorporated herein by reference.

6. Beginning in or about February 2020, and continuing to in or about January 2021, within the Southern District of Indiana and elsewhere,

OLUWATOBI SENSI SETON

the Defendant herein, did knowingly and willfully combine, conspire, confederate and agree with others known and unknown, to violate Title 18, United States Code, Section 1343 ("Wire Fraud"), that is, to knowingly and with intent to defraud, devise and intend to devise, and willfully participate in, with knowledge of its fraudulent nature, the scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, or promises described below (the "Scheme"), and for the purpose of executing such scheme and artifice, or attempting so to do, knowingly transmitted and caused to be transmitted by means of wire, radio, or television.

Purpose of the Conspiracy and the Scheme to Defraud

7. It was the purpose of the conspiracy and Scheme to obtain unemployment and other benefits from state and federal governments by falsely applying for such benefits using the stolen identities of the Benefits Victims.

8. It was further the purpose of the conspiracy and Scheme to conceal the source of the stolen funds and distribute them to conspirators within the United States and abroad.

Manner and Means

The following were the manners and means of the conspiracy and Scheme:

9. Conspirators in Nigeria provided SETON with PII of GoBank Victims. SETON and other conspirators used that PII to purchase, open, and register GoBank prepaid debit cards and associated GoBank bank accounts. The purpose of these accounts was to receive stolen unemployment and other government benefits.

10. Conspirators submitted false and fraudulent unemployment applications and other state and federal benefit applications to unemployment agencies throughout the United States in the names of Benefit Victims, including in Indiana. The conspirators used PII of Benefit Victims to apply for unemployment benefits without the Benefit Victims knowledge or authorization. The applications directed that the benefits be deposited on the GoBank prepaid debit cards that SETON and other conspirators opened.

11. For instance, on or about June 16, 2020, SETON purchased a GoBank card and, on or about June 18, 2020 activated and registered the card in the name of S.W. (a GoBank Victim and Benefits Victim) using, among other things, S.W.'s name, date of birth, and social security number. Between June 22, 2020 and December 29, 2020, approximately \$16,722 of

funds were deposited into the S.W. GoBank account from multiple state employment agencies, including \$8,388 in unemployment benefits from the Indiana Department of Workforce Development based on an application in the name of S.W. containing, among other things, S.W.'s name, date of birth, and social security number. The real S.W. did not apply for unemployment nor was S.W. aware of or authorized the filing of such application. The real S.W. also did not register the GoBank card, nor was S.W. aware of or authorized such registration.

12. Once the government benefits were transferred to the GoBank accounts, SETON used the GoBank prepaid debit cards to withdraw the funds in the form of U.S. Currency, bring the currency to Walmart locations throughout Indiana and Illinois, and convert the cash to money orders. SETON used fictitious driver's licenses to show proof of identification for the withdrawal of the money. ATM withdrawals using GoBank prepaid debit cards in Indiana caused wire transmissions in interstate or foreign commerce.

13. SETON then, at the direction of her co-conspirators in Nigeria, provided the money orders to other individuals whose role in the scheme was to send or transfer the stolen funds back to the conspirators, including those in Nigeria. SETON conversed and coordinated with these other individuals, meeting them at various locations in Indiana and Illinois to deliver the money orders.

14. SETON retained a portion of the proceeds for her participation in the scheme.

15. The conspiracy caused over \$4 million USD in actual losses and over \$1 million in attempted losses to state and federal agencies.

All of which is a violation of Title 18, United States Code, Section 1349.

Count Two

Aggravated Identity Theft

(Title 18, United States Code, Section 1028A(a)(1) and (c)(5))

16. Paragraphs 1 through 15 are re-alleged and incorporated herein by reference.
17. On or about June 18, 2020, within the Southern District of Indiana and elsewhere,

OLUWATOBI SENSI SETON,

the Defendant herein, during and in relation to the foregoing felony violation of Title 18, United States Code, Section 1343 (wire fraud) as alleged in Count 1 above, knowingly possessed and used, without lawful authority, a means of identification of another person, in and affecting interstate commerce, that is, the Defendant possessed the name, date of birth, and social security number of S.W., and utilized that PII to register a GoBank prepaid debit card and associated GoBank account in the name of S.W. to receive the proceeds of the scheme.

All of which is a violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5).

Count Three

Conspiracy to Commit Money Laundering
(Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i))

18. Paragraphs 1 through 17 are re-alleged and incorporated herein by reference.

19. Beginning in or about February 2020, and continuing to in or about January 2021, within the Southern District of Indiana and elsewhere,

OLUWATOBI SENSI SETON,

the Defendant herein, did knowingly and willfully combine, conspire, and agree with other persons known and unknown to commit offenses against the United States, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, the Scheme described herein, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

All of which is a violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i).

FORFEITURE

20. The allegations contained in Counts 1 through 3 of this Information are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(A), 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c).

21. Pursuant to Title 18, United States Code, Sections 981(a)(1)(A), 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c), upon conviction of a violation of the offenses in Title 18, United States Code, Section 1349 and 1343 set forth in Count 1 of this Information, and in Title 18, United States Code, Section 1956(h) set forth in Count 3 of this Information,

OLUWATOBI SENSI SETON

the Defendant herein, shall forfeit to the United States of America:

- a. any property, real or personal, involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1956, or any property traceable to such property; or
- b. any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1343, or a conspiracy to commit such offense; or
- c. a sum of money equal to the total amount of the proceeds of the offenses.

22. The property subject to forfeiture includes, but is not necessarily limited to the following:

Item No.	Description	Location Seized
1	\$2,091.00 USD	Seized by the Monroe County Sheriff's Department on January 12, 2021
2	1,321 prepaid Cards	Seized by the Monroe County Sheriff's Department on January 12, 2021
3	Fifty-two (52) sealed Visa prepaid cards	Seized by the Monroe County Sheriff's Department on January 12, 2021
4	One (1) sealed American Express card and one (1) American Express card	Seized by the Monroe County Sheriff's Department on January 12, 2021
5	Black and Red Acer laptop computer S/N NHQSWAA001927032B33400	Seized by the Monroe County Sheriff's Department on January 12, 2021
6	Thirty-two (32) Visa prepaid cards	Seized by the Monroe County Sheriff's Department on January 12, 2021
7	Black USB Drive	Seized by the Monroe County Sheriff's Department on January 12, 2021
8	Four (4) Alcatel cell phones with batteries and charger	Seized by the Monroe County Sheriff's Department on January 12, 2021
9	White HP laptop computer S/N 5CD74614D	Seized by the Monroe County Sheriff's Department on January 12, 2021
10	Twelve (12) sealed GreenDot Visa cards and One (1) sealed MyVanilla card	Seized by the Monroe County Sheriff's Department on January 12, 2021
11	Three (3) New York identification cards, Five (5) Texas identification cards, and Two (2) California identification cards.	Seized by the Monroe County Sheriff's Department on January 12, 2021
12	One (1) black iPhone & 1 Silver iPhone, FCC ID BCG-E2945A	Seized by the Monroe County Sheriff's Department on January 12, 2021
13	\$63,260 Cash	800 E. North Street, Storage Unit 2041, Crown Point, Indiana
14	Silver Meizu Phone; Pro5 TD-LTE	7937 West 19th Street, Unit D47, Indianapolis, Indiana

Item No.	Description	Location Seized
15	Black LG Cell Phone; Model LM-X420MM; IMEI: 359962-10-383255-4	7937 West 19th Street, Unit D47, Indianapolis, Indiana
16	Black Coolpad Phone	7937 West 19th Street, Unit D47, Indianapolis, Indiana
17	Grey iPhone S, Model A1688, FCC ID: BCG-E2946A, IC: 579C-E2946A	7937 West 19th Street, Unit D47, Indianapolis, Indiana
18	\$19,800 Cash	7937 West 19th Street, Unit D47, Indianapolis, Indiana
19	\$1,500 Cash	1330 Morton Avenue, Unit A3, Martinsville, Indiana
20	\$210,840.08	GoBank Accounts – Seizure Warrant (21-mj-0073)
21	\$261,093.39	GoBank Accounts – Seizure Warrant (21-mj-0745)

23. If any of the property described above, 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 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).


24. In keeping with the foregoing, it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of all forfeitable property as described above.

All of which is pursuant to Title 18, United States Code, 981(a)(1)(A), 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c).

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