

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
 :
 v. : Mag. No. 23-9196 (CLW)
 :
 GBENGA AKINBODE : **CRIMINAL COMPLAINT**

I, Bladimir Daza, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the U.S. Department of Labor, Office of Inspector General, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Special Agent Bladimir Daza
U.S. Department of Labor
Office of Inspector General

Special Agent Daza attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A).

I
Sworn to and subscribed via telephone, NEW JERSEY
this 3rd day of May, 2023 State

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

Cathy Waldor — BD
Signature of Judicial Officer

ATTACHMENT A

(Wire Fraud)

From in or about December 2020 through in or about November 2021, in Essex County, in the District of New Jersey and elsewhere, defendant

GBENGA AKINBODE

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud various states and the federal government and others, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, to wit, a wire transmission sent on or about January 5, 2021, from a location inside of New Jersey to a location outside of New Jersey.

In violation of Title 18, United States Code, Section 1343 and Section 2.

ATTACHMENT B

I, Bladimir Daza, a Special Agent with the U.S. Department of Labor, Office of Inspector General (“DOL-OIG”), having personally participated in an investigation of the conduct of defendant GBENGA AKINBODE (“AKINBODE”), and having spoken with other law enforcement officers and individuals and reviewed documents, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the actions, statements, and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated.

1. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act “CARES Act” was signed into law. The CARES Act created a new temporary federal unemployment insurance program called Pandemic Unemployment Assistance (“PUA”). PUA provided unemployment insurance benefits (“UIBs”) for individuals who were not eligible for other types of unemployment (e.g., self-employed, independent contractors, gig economy workers). The CARES Act also created a new temporary federal program called Federal Pandemic Unemployment Assistance that provided an additional \$600 weekly benefit to those eligible for PUA and regular UIBs. Unemployment Insurance (“UI”) is a state-federal program that provides UIBs to eligible workers.

2. During the timeframe of the offense, Paycheck Protection Program (“PPP”) loans were loans to aid entities and keep their workforce employed during the COVID-19 pandemic.

3. On or about December 16, 2020, defendant AKINBODE opened a bank account in his name ending in 3075 (the “3075 Bank Account”). Between in or about December 2020 and in or about November 2021, approximately \$540,000 in United States Postal Money Orders was deposited into the 3075 Bank Account. Approximately \$500,000 of the approximately \$540,000 in money orders were purchased using approximately 120 Green Dot Bank debit cards (the “Green Dot Cards”).

4. The Green Dot Cards were funded with approximately \$4,000,000 comprised of UIBs, PPP loans, and payments from the Internal Revenue Service (“IRS Payments”).

5. On or about January 5, 2021, a money order purchased using one of the Green Dot Cards was deposited into the 3075 Bank Account at a branch in New Jersey. That deposit caused a wire transaction to occur between the State of New Jersey and a location outside of New Jersey where the bank server was located.

6. On or about February 11, 2022, a business bank account ending in 6323 (the "6323 Bank Account") was opened. Defendant AKINBODE was the sole signatory to the account. The address provided at the time the 6323 Bank Account was opened was an address in Newark, New Jersey (the "New Jersey Address"). Records obtained during the investigation, including from the Department of Homeland Security, reveal that defendant AKINBODE listed the New Jersey Address as his residence.

7. The New Jersey Address was used in connection with approximately 60 applications for UIBs. Approximately \$232,000 was provided in response to those applications. These funds were separate and apart from the funds placed on the Green Dot Cards.

8. Records obtained during this investigation revealed that a second location in Newark, New Jersey (the "Second New Jersey Address") was used in connection with approximately 482 applications for UIBs. Approximately \$558,000 was paid out in response to these applications. These funds are separate and apart from the funds placed on the Green Dot Cards.

9. A phone number provided as part of approximately 6 of the UIB applications connected to the New Jersey Address was also listed on approximately 111 UIB applications connected to the Second New Jersey address.

10. Approximately 11 different email addresses were used both in connection with UIB applications tied to the New Jersey Address and UIB applications tied to the Second New Jersey Address.

11. On or about September 13, 2020, defendant AKINBODE used a debit card (the "Card") to conduct an ATM balance inquiry. The investigation revealed that the Card had been funded in response to a UIB claim and mailed to the Second New Jersey Address.

12. Additionally, law enforcement interviewed approximately four individuals whose names were used to fraudulently obtain UIBs or PPP loans that were funded onto one of the approximately 120 Green Dot Cards. Each individual stated, in substance and in part, that s/he did not file a claim for UIBs or a PPP loan, did not authorize anyone to file a claim on their behalf, and does not know defendant AKINBODE.

13. Law enforcement also interviewed approximately two individuals whose names were used to fraudulently obtain UIBs tied to the New Jersey Address. Each individual stated, in substance and in part, that s/he did not file a claim for UIBs, did not authorize anyone to file a claim on their behalf, and does not know defendant AKINBODE.