

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

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Crim. No. 18-
v.	:	
	:	18 U.S.C. § 1349
	:	18 U.S.C. § 1028A
OLUSEGUN AKINLADE,	:	18 U.S.C. § 2
a/k/a, "Shadow Walker"	:	

INDICTMENT

The Grand Jury, in and for the District of New Jersey, sitting at Newark, charges:

Count One
(Conspiracy to Commit Bank Fraud)

Background

1. At various times relevant to this Indictment:
 - a. Defendant OLUSEGUN AKINLADE, a/k/a "Shadow Walker" ("AKINLADE"), resided in Dubai, United Arab Emirates.
 - b. Henry Abdul, a co-conspirator not charged as a defendant herein, resided in Newark and North Brunswick, New Jersey.
 - c. "Victim Bank 1" and "Victim Bank 2" (collectively, the "Victim Banks") were "financial institutions" as that term is defined in Title 18, United States Code, Section 20, offering, among other things, credit cards to customers.

d. “Victim Cardholder 1” was a customer of Victim Bank 1 who resided in or around Mohave Valley, Arizona, and held a credit card account ending in account number 6272.

e. A “credit card takeover” referred to a situation where an unauthorized user, who was not the account owner or authorized user of a credit card account, contacted the financial institution that issued the credit card and posed as the account owner in order to change the personal information associated with the actual account owner to information familiar to the unauthorized user. The information changed may have included the residential address, email address, or telephone number associated with the account. These changes to the account were designed to give the unauthorized user control of the account without the actual account owner’s knowledge or authorization, and to permit the unauthorized user to receive new credit cards associated with the compromised account. Once in control of the account, the unauthorized user profited by using the compromised account to make purchases, transfer funds to other accounts under the user’s control, or sell the account information to third parties.

The Conspiracy

2. From in or about October 2015 through in or about January 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

OLUSEGUN AKINLADE,
a/k/a “Shadow Walker,”

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud financial institutions, as defined in Title 18,

United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, assets, and other property owned by and under the custody and control of such financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Goal of the Conspiracy

3. The goal of the conspiracy was for AKINLADE and others to obtain money and property from customer accounts of the Victim Banks by obtaining control of the customer accounts through a credit card takeover scheme, and then using the compromised credit card accounts to purchase gift cards, postal money orders, and high-value merchandise.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that AKINLADE and his co-conspirators obtained control of numerous credit card accounts provided by the Victim Banks and other financial institutions by, among other things, contacting the relevant financial institution and posing as the account owner in order to change certain information associated with the customer accounts (the "Compromised Accounts"). The information changed included the residential address, email address, and telephone number associated with the Compromised Accounts.

5. It was further part of the conspiracy that AKINLADE and his co-conspirators purchased the victim account holders' personal identifying

information (“PII”) from hackers located outside of the United States. The co-conspirators then used the stolen PII when contacting the Victim Banks to carry out the account takeovers, or to open new accounts.

6. It was further part of the conspiracy that AKINLADE and his co-conspirators ordered credit cards to be shipped to them by the Victim Banks in the names of the bank customers without the customers’ knowledge or authorization.

7. It was further part of the conspiracy that the co-conspirators, including Abdul and others acting at his direction, used the Compromised Accounts to purchase high-value items, including smartphones, tablets, and other electronic devices from a high-end electronics retailer. For example, on or about June 22, 2017, Abdul purchased a new smartphone at a retail electronics store in or around Short Hills, New Jersey. To make the purchase, Abdul used a Compromised Account issued by Victim Bank 2 ending in 1878, which had previously been the subject of a credit card takeover. Over the course of the next day, the co-conspirators used this Compromised Account to make approximately \$17,000 in unauthorized purchases at various shopping malls in New Jersey.

8. It was further part of the conspiracy that AKINLADE received from Abdul and other co-conspirators merchandise that they had purchased with the Compromised Accounts and a percentage of any profits the co-conspirators made selling such merchandise. For example, on or about January 11, 2016, Abdul sent a package from South Orange, New Jersey, to AKINLADE in Dubai.

The package contained merchandise the co-conspirators had purchased using Compromised Accounts.

9. It was further part of the conspiracy that AKINLADE and his co-conspirators discussed the scheme in electronic communications, including email and instant messenger chats. AKINLADE used these methods of communication to provide his co-conspirators fraudulently obtained credit card information, including account numbers and expiration dates, and new addresses to which credit cards obtained through account takeovers would be sent.

All in violation of Title 18, United States Code, Section 1349.

Count Two
(Aggravated Identity Theft)

1. The allegations in paragraphs 1 and 3 through 9 of Count One of this Indictment are re-alleged and incorporated as if set forth fully herein.

2. On or about January 16, 2016, in the District of New Jersey, and elsewhere, the defendant,

OLUSEGUN AKINLADE,
a/k/a "Shadow Walker,"

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another individual, namely, a credit card account of Victim Cardholder 1, during and in relation to a felony violation of a provision contained in Chapter 63 of the United States Code, that is, conspiracy to commit bank fraud in violation of Title 18, United States Code, Section 1349, charged in Count One of this Indictment.

In violation of Title 18, United States Code, Section 1028A(a)(1), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

2. The United States hereby gives notice to the defendant, that upon his conviction of the offense charged in Count One of this Indictment, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

3. 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,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of

any other property of such defendant up to the value of the forfeitable property described in paragraph 2.

A TRUE BILL

Grand Jury Foreperson



CRAIG CARPENITO
UNITED STATES ATTORNEY

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INDICTMENT FOR

18 U.S.C. § 1349
18 U.S.C. § 1028A
18 U.S.C. § 2

CRAIG CARPENITO

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