

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.

Tunde Adeowo

Case No. 20-2080 (JS)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of in or about 6/2016 through 3/2020 in the county of Camden and Mercer in the
District of New Jersey, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 U.S.C. § 1349, Conspiracy to commit bank fraud. (See Attachment A.)

This criminal complaint is based on these facts:

See Attachment B, Affidavit of probable cause.

Continued on the attached sheet.

Michael Durocher

Complainant's signature

Michael R. Durocher, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/24/2020

Handwritten signature of Joel Schneider

Judge's signature

City and state: Camden, NJ

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED  
UNITED STATES ATTORNEY

By:           *s/PATRICK C. ASKIN*            
          PATRICK C. ASKIN, AUSA

Date:   June 24, 2020

**Attachment A**

(Conspiracy to Commit Bank Fraud)

From in or about June 2016 through in or about March 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

**TUNDE ADEOWO**

did knowingly and intentionally conspire and agree with co-conspirators, and with others, known and unknown, to devise a scheme and artifice to defraud a financial institution, namely TD Bank and other victim banks, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Victim Bank # 1 and other victim banks, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344, as described in Attachment B.

In violation of Title 18, United States Code Section 1349.

## **ATTACHMENT B**

I, Michael Durocher, am a United States Postal Inspector assigned to the Philadelphia Division of the United States Postal Inspection Service (USPIS), have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation, as well as upon information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a Criminal Complaint against Tunde ADEOWO (hereafter "ADEOWO"), I have not necessarily included each and every fact known to the Government concerning this investigation.

1. On or about August 16, 2017, a Victim Bank 1 Investigator contacted the United States Postal Inspection Service (USPIS) concerning several bank accounts that were closed by Victim Bank 1 due to suspected fraudulent activity. A Victim Bank 1 representative made USPIS aware the accounts were opened using suspected fraudulent foreign passports and United States Visas at Victim Bank 1 branches located in New Jersey and Pennsylvania. After they were opened, the accounts had minimal activity during the first two months. Any initial activity consisted of Western Union, MoneyGram, US Postal money orders, or cash deposits. After the two month period, individuals deposited large business checks into the account and quickly withdrew the funds, either by ATM withdrawals or by purchasing money orders at various money order vendors

such as grocery and discount stores. Shortly after the checks were deposited, Victim Bank 1 began to receive claims stating the checks were stolen and the payee section was altered to show someone that was not intended to receive the check. Although the payee on the check was altered, the amount on the check was not changed. By October 2017, this affiant identified over thirty (30) fraudulent accounts with a total exposure of approximately \$800,000 to several financial institutions.

2. In the initial stages of the investigation, this affiant discovered at least twenty seven (27) fraudulent bank accounts that were opened between July 2016 and March 2017. The accounts were opened at numerous financial institutions in the state of New Jersey under the assumed names of Wunmi Akrana, Emanuel Kuti, Olawale Johnson, Steven Akpan, Olawole Adefarasin, and Anthony Tunde Camara. In addition, law enforcement identified Co-Conspirator 1 as the individual that opened the Olawale Johnson and Anthony Tunde Camara accounts. As the investigation progressed and additional fraudulent accounts were identified, law enforcement discovered the pattern of activity moved from New Jersey to Pennsylvania, Rhode Island, and Maryland.

3. Between September 13, 2017 and September 14, 2017, this affiant contacted the payer on several checks suspected of being altered and deposited into accounts that were closed by the bank for suspected fraud. The interviews confirmed the payee's name was altered on all of the checks to reflect the name used on a fraudulent account. The accounts to which these checks were

deposited were opened in the assumed names of Solomon Henry, Moussa Johnson Traore, Rasheed Williams, Banji Aiwanfo, and John Anoliefo.

4. This affiant examined the bank accounts referenced in paragraph 3 and discovered the accounts were opened using foreign passports, each containing United States Visas, which were believed to be counterfeit.

5. On or about November 17, 2017, this affiant met with Department of State - Diplomatic Security Service (DSS) to discuss the passports and United States Visas used to open the fraudulent bank accounts. A Special Agent (SA) from DSS confirmed the passports and United States Visas were counterfeit and the identifiers on the documents did not match any Consular records in the Department of State's systems.

6. On or about December 12, 2017, this affiant met with the Loss Prevention manager at a grocery store located in Philadelphia, PA. The Loss Prevention manager located video footage transactions related to a fraudulent Victim Bank 1 account under the name Lero Payo<sup>1</sup>. The account ended in x7301. The video showed a male purchasing money orders with a Victim Bank 1 debit card.

7. On or about August 29, 2018, law enforcement was contacted by the HSI Forensic Lab and made aware that ADEOWO was associated to the address of 91 Saw Creek Estates, Bushkill, PA 18324<sup>2</sup>. In addition, the HSI

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<sup>1</sup> Although law enforcement was not able to confirm the person depicted in the grocery store images, law enforcement does have images recovered from other bank accounts opened in the name Lero Payo that positively identified ADEOWO as conducting transactions in this account.

<sup>2</sup> After Co-Conspirator 2 was identified, law enforcement discovered he was associated to 91 Saw Creek Estates, Bushkill, PA 18324. Additional research was conducted on the 91 Saw

Forensic Lab linked three (3) parcels containing fraudulent passports with ADEOWO's image on them. Furthermore, this affiant ran ADEOWO's Pennsylvania DMV information and obtained an image of ADEOWO that matched video footage from the bank related to the fraud. The fraudulent passports containing ADEOWO's image are detailed below:

- a) On or about June 29, 2017, CBP seized one (1) counterfeit Gambian passport (PC360071) in the name of Henry Solomon and one (1) counterfeit Kenyan passport (A7115648) in the name of Paul Banta (DOB: 04/09/1983). The shipment originated from Nigeria and was destined to 5 Peter St, Providence, RI.
- b) On or about February 6, 2018, CBP seized one (1) counterfeit South African passport (A40729129) in the name of Christopher Brown with a corresponding South African driver's license (7541059214) for Christopher Brown. The package originated from Nigeria and was destined for 260 Park Hill Ave, 6R, Staten Island, NY.
- c) On February 22, 2018, CBP seized one (1) counterfeit South African passport (A00376825) in the name of Christopher Brown with a corresponding counterfeit South African driver's license (7567059238) for Christopher Brown. The package originated from Nigeria and was destined to 18655 Norwood St, Detroit, MI.

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Creek Estates address and discovered ADEOWO and Co-Conspirator 11 lived at the aforementioned address during the same time period.

8. On or about September 24, 2018, DSS notified this affiant and HSI of an additional seizure linked to ADEOWO. On November 16, 2017, UKBF authorities in London intercepted two counterfeit Gambian passports with corresponding counterfeit US Visas. One (1) set of fraudulent documents contained images of ADEOWO and one (1) set of fraudulent documents contained images of Co-Conspirator 5. The DHL package containing the documents originated from Nigeria and was destined to 5409 Eastwick Terrace, Apt 3A, Philadelphia, PA with telephone number (347) 696 - 7082<sup>3</sup>. The document is detailed below:

- a) Gambian passport (PC053269) using the name Frank Paul with counterfeit US Visa number 2017018520017. The true identity depicted in this passport has been confirmed as ADEOWO.

9. From on or about December 22, 2016 through December 12, 2019, bank records revealed ADEOWO opened approximately eleven (11) accounts under the assumed name of Solomon Henry<sup>4</sup>, approximately eleven (11) accounts under the assumed name of Dele Alasan, approximately four (4) accounts under the assumed name of Alex Tourey, approximately eleven (11) accounts under the assumed name of Wale David, approximately seven (7) accounts under the assumed name of Richard Momodou, approximately eight (8) account under the assumed name of Mathew Akoto, approximately one (1)

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<sup>3</sup> An additional set of fraudulent documents that contained images of Co-Conspirator 5 were discovered in the same seized DHL package.

<sup>4</sup> The documents presented for identification on the Solomon Henry were also used to open accounts with the name appearing as Henry Solomon.



account under the assumed name of Samuel Mhlamba, approximately one (1) account under the assumed name of Bright Okpohbi, and approximately one (1) account under the name of Adongo Kariuki for an estimated intended loss of \$520,496.39. ADEOWO utilized fictitious West African passports in these assumed names bearing his image to open the aforementioned accounts. This affiant obtained copies of the above passports and video footage from the banks, which showed ADEOWO as the individual that opened the accounts.

The accounts are listed below:

<b><u>Date of Account Opening</u></b>	<b><u>Bank</u></b>	<b><u>Account Numbers</u></b>	<b><u>Amount</u></b>	<b><u>Assumed Name</u></b>
12/22/2016	Victim Bank 3	X3571, X3598, X3619	\$24,103.54	Henry Solomon
12/22/2016	Victim Bank 2	X4031, X8146	\$42,593.14	Henry Solomon
12/22/2016	Victim Bank 1	X3678, X5124	\$60,370.87	Solomon Henry
12/22/2016	Victim Bank 4	X3236	\$10,706.60	Henry Solomon
12/22/2016	Victim Bank 6	X2463, X5943	\$7.99	Solomon Henry
12/27/2016	Victim Bank 5	X0071	\$18,999.63	Solomon Henry
6/6/2017	Victim Bank 1	X3500, X2537	\$17,863.44	Alex Tourey
6/6/2017	Victim Bank 2	X5860, X0970	\$22,960.20	Alex Tourey
6/12/2017	Victim Bank 1	X0718, X3542	\$5.95	Dele Alasan
6/12/2017	Victim Bank 4	X9146, X5731	\$25.25	Dele Alasan
6/13/2017	Victim Bank 5	X4807, 9416	\$0.00	Dele Alasan

6/13/2017	Victim Bank 3	X0357, X0365, X0373	\$0.00	Dele Alasan
6/15/2017	Victim Bank 2	X7477, X5090	\$26,872.30	Dele Alasan
9/7/2017	Victim Bank 1	X9146, X7213	\$20,709.47	Wale David
9/11/2017	Victim Bank 5	X9278, X6347	\$0.00	Wale David
9/11/2017	Victim Bank 2	X0719, X0722	\$10,680.60	Wale David
9/11/2017	Victim Bank 4	X7691	\$0.00	Wale David
9/15/2017	Victim Bank 3	X3216, 3232, X3224	\$0.00	Wale David
9/15/2017	Victim Bank 6	X8671	\$49,943.23 <sup>5</sup>	Wale David
9/14/2018	Victim Bank 1	X4210	\$11,828.40	Richard Momodou
9/14/2018	Victim Bank 4	X3671	\$34,774.78	Richard Momodou
9/14/2018	Victim Bank 3	X4093, X4106, X4114	\$11,196.84	Richard Momodou
9/17/2018	Victim Bank 5	X8835	\$0.00	Richard Momodou
9/17/2018	Victim Bank 2	X9768	\$29,121.88	Richard Momodou
10/12/2018	Victim Bank 1	X0779	\$8,316.36	Mathew Akoto
10/20/2018	Victim Bank 4	X5740	\$21,382.19	Mathew Akoto
10/20/2018	Victim Bank 3	X7125, X7133, X7141	\$40,774.80	Mathew Akoto
10/23/2018	Victim Bank 5	X6070, X2824	\$0.00	Mathew Akoto
10/24/2018	Victim Bank 2	X3058	\$36,954.42	Mathew Akoto

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<sup>5</sup> The deposits into the Wale David Victim Bank 6 account X8671 consisted of 19 wire transfers and the funds deposited into the account were withdrawn by cash withdrawals.

10/2/2019	Victim Bank 1	X0034	\$10,828.63	Samuel Mhlamba
10/04/2019	Victim Bank 1	X9872	\$9,475.88	Bright Okpohbi
12/12/2019	Victim Bank 1	X4104	\$0.00	Adongo Kariuki

Furthermore, law enforcement obtained images provided by the banks of ADEOWO conducting approximately \$126,842.07 worth of transactions on the following additional fraudulent accounts which includes activity through March 2020:

<b><u>Date</u></b>	<b><u>Bank</u></b>	<b><u>Type of Transaction</u></b>	<b><u>Amount</u></b>	<b><u>Assumed Name</u></b>
11/30/2016	Victim Bank 1	Deposit	\$10,634.82	Wunmi Akrana
12/26/2016	Victim Bank 4	Deposit	\$20.00	Adesina Rufus
12/26/2016	Victim Bank 4	Deposit	\$10,331.80	Adesina Rufus
1/7/2017	Victim Bank 4	Withdrawal	\$300.00	Adesina Rufus
1/9/2017	Victim Bank 4	Withdrawal	\$300.00	Adesina Rufus
1/24/2017	Victim Bank 4	Deposit	\$10,423.80	Adesina Rufus
1/27/2017	Victim Bank 4	Withdrawal	\$300.00	Adesina Rufus
11/6/2017	Victim Bank 1	Deposit	\$8,185.91	Lero Sophie Payo
11/12/2017	Victim Bank 1	Deposit	\$8,188.67	Lero Sophie Payo

11/19/2017	Victim Bank 2	Deposit	\$20.00	Lero Sophie Payo
11/26/2017	Victim Bank 1	Deposit	\$18,873.16	Lero Sophie Payo
8/2/2018	Victim Bank 1	Deposit	\$13,140.21	Anita Omowunmi Egaide
3/9/2019	Victim Bank 1	Deposit	\$10,228.32	Joseph Weah
6/4/2019	Victim Bank 3	Deposit	\$10,849.93	Mathew Akoto
11/13/2019	Victim Bank 1	Withdrawal	\$400.00	Smith Bitok
3/16/2020	Victim Bank 1 <sup>6</sup>	Withdrawal	\$480.00	Abram Mikayla
3/16/2020	Victim Bank 1	Withdrawal	\$200.00	Benedict Gaye
3/16/2020	Victim Bank 1	Deposit	\$10,000.00	Mikayla Abram
3/26/2020	Victim Bank 1 <sup>7</sup>	Deposit	\$13,965.45	Benedict Gaye

10. On or about June 27, 2019, USPIS, HSI, and DSS conducted surveillance at the 119 E Providence Rd, Lansdowne, PA (hereafter “MURITALA RESIDENCE”). At approximately 9:15 am, law enforcement observed a black Toyota sedan bearing Pennsylvania registration KXZ9488 park outside of the

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<sup>6</sup> On March 16, 2020, ADEOWO withdrew \$480.00 from Victim Bank 1 account X6196 and \$200.00 from Victim Bank 1 account X2874. In addition, ADEOWO deposited \$10,000.00 into Victim Bank 1 account X6196. All three (3) transactions occurred at a Victim Bank 1 branch located on 6 Gove St, Cherry Hill, NJ 08002.

<sup>7</sup> On March 26, 2020, ADEOWO deposited \$13,965.45 into Victim Bank 1 account X2874 at a Victim Bank 1 branch located on 180 N Black Horse Pike, Bellmawr, NJ 08031.

MURITALA RESIDENCE. A black male, later identified as Co-Conspirator 12<sup>8</sup>, exited the vehicle and spoke with ADEOWO on the front lawn of the MURITALA RESIDENCE. Co-Conspirator 12 walked back to the black Toyota sedan and drove away.

11. On November 13, 2019, USPIS, HSI, and DSS conducted surveillance on the MURITALA RESIDENCE. Law enforcement observed ADEOWO exit the MURITALA RESIDENCE and drive a black Audi A4, which is registered to him, to Upper Darby, PA. ADEOWO parked the vehicle and walked to the drive-through ATM at Victim Bank 1 located at 2200 Garrett Road, Drexel Hill, PA 19026. After ADEOWO finished at the ATM, law enforcement observed ADEOWO walk back to the black Audi A4 and drive back to the MURITALA RESIDENCE. This affiant contacted Victim Bank 1 and inquired about the transaction that ADEOWO performed at the ATM. A Victim Bank 1 investigator stated the account belonged to a “Smith Bitok” and ADEOWO withdrew \$400.00 from the account. In addition, the account was opened with a US VISA. An agent from DSS confirmed the US VISA used to open the account did not exist and was possibly fraudulent.

12. On April 22, 2020, HSI conducted surveillance on the MURITALA RESIDENCE. During the surveillance, law enforcement observed ADEOWO exit the MURITALA RESIDENCE and drive away in a Toyota Highlander. Law enforcement followed ADEOWO to the Snapbox Self Storage facility located at

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<sup>8</sup> Co-Conspirator 12 is referenced in the affidavit and is a participant in the conspiracy. To date, he has opened approximately seventy one (71) fraudulent accounts for an approximate intended loss of \$1 million.

2240 Island Avenue, Philadelphia, PA 19142. ADEOWO entered the front gate of the facility at approximately 12:45pm. ADEOWO exited the facility at approximately 12:56pm.

13. On May 26, 2020, this affiant received a report from Snapbox of all individuals that accessed the Snapbox Self Storage facility on April 22, 2020. The report showed on April 22, 2020 at 12:45pm, an individual by the name of Michael Houle entered the facility. This affiant reviewed the customer application for Michael Houle and identified the name and identifiers used to open the Snapbox account were the same identifiers used to open fraudulent bank accounts under the same name in this investigation. In addition, the Snapbox application for Michael Houle included an image of the Kenyan passport used to open the account. Co-Conspirator 12's image was on the passport. Furthermore, Co-Conspirator 12 opened fraudulent bank accounts using the aforementioned Kenyan passport at Victim Bank 1, Victim Bank 3, Victim Bank 4, and Victim Bank 6 between May 15, 2017 and May 26, 2017 for an estimated exposure of \$47,178.96. The Michael Houle Snapbox account was opened on June 23, 2017.

14. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that from in or about June 2016 to in or about March 2020 in the District of New Jersey and elsewhere, ADEOWO conspired and agreed, with others, known and unknown to the United States, to commit bank fraud, contrary to Title 18, United States Code, Section 1344, in violation of Title 18, United States Code, Section 1349.

15. To date, the investigation has revealed that the full extent of the criminal activity identified thus far involves approximately four hundred seventy (470) fraudulent bank accounts with an estimated exposure of \$5.7 million. ADEOWO conspired with individuals both known and unknown to commit the federal offenses outlined in the aforementioned paragraph.

*Michael Durocher*

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Michael R. Durocher  
U.S. Postal Inspector

Pursuant to F.R.Crim.P. 4.1, U.S. Postal Inspector Durocher was sworn and attested to the contents of this affidavit in support of the complaints.

*Joel Schneider*  
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HONORABLE JOEL SCHNEIDER  
United States Magistrate Judge

Date: June 24, 2020