

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

UNITED STATES OF AMERICA,

1:15-CR- 00172-AA

Plaintiff,

INDICTMENT (UNDER SEAL)

v.

EMMANUEL OLUWATOSIN KAZEEM,
OLUWATOBI RUEBEN DEHINBO,
LATEEF AINA ANIMAWUN,
OLUWASEUNARA TEMITOPE
OSANYINBI, and
OLUWAMUYIWA ABOLAD OLAWOYE,

Count 1: 18 U.S.C. § 1349
Conspiracy to Commit Mail and Wire Fraud

Counts 2 through 8: 18 U.S.C. § 1341
Mail Fraud

Counts 9 through 14: 18 U.S.C. § 1343
Wire Fraud

Defendants.

Counts 15 through 27: 18 U.S.C. § 1028A
Aggravated Identity Theft

Forfeiture Allegations:
18 U.S.C. § 982(a)(2) and 28 U.S.C. § 2461(c)

THE GRAND JURY CHARGES:

COUNT 1

(CONSPIRACY TO COMMIT MAIL AND WIRE FRAUD)

INTRODUCTION

At all times material to this Indictment:

1. As set forth below, defendants' conduct involved obtaining stolen personal identifying information of more than 125,000 individuals and, beginning at least as early as the 2012 tax year to the present, using that information to file fraudulent federal and state tax returns. In total, defendants and their co-conspirators filed over 980 false federal tax returns seeking over \$6.6

million dollars in fraudulent refunds. The actual loss exceeded \$2 million dollars from tax returns accepted for payment by the Internal Revenue Service (IRS).

2. Defendant **EMMANUEL OLUWATOSIN KAZEEM**, also known by online monikers “philipe1212@xxx.com” and “Paka Phil,” resides in Maryland.

3. Defendant **OLUWATOBI RUEBEN DEHINBO**, also known by online moniker “knightyngale@xxx.com,” resides in Georgia.

4. Defendant **LATEEF AINA ANIMAWUN**, also known by online moniker “lolad_pop@xxx.com,” resides in Georgia.

5. Defendant **OLUWASEUNARA TEMITOPE OSANYINBI**, also known by online moniker “oluwaseunara@xxx.com,” resides in Georgia.

6. Defendant **OLUWAMUYIWA ABOLAD OLAWOYE**, also known by online moniker “macktomson20@xxx.com,” resides in Georgia.

7. The term “Personal Identifying Information” or “PII,” can include an individual’s name, address, social security number, date of birth, places of work, duration of work, state driver’s license number, mother’s maiden name, bank account numbers, bank routing numbers, e-mail account names, and other account passwords.

8. For tax purposes, an “Electronic Filing PIN” is a five digit personal identification number required for electronically filing tax returns with the IRS when the filer does not have a Self-Select PIN or know his or her Adjusted Gross Income from the previous year. Using the website IRS.gov, a filer can request an Electronic Filing PIN by authenticating his or her purported identity by entering a host of personal information, including social security number, full name, date of birth, filing status, and full address.

9. A “means of identification” is any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a name, Social Security number, date of birth, or an access device. 18 U.S.C. § 1028(d)(7).

10. An “access device” is, among other things, any card, account number, or other means of account access, that could be used, alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value, or that could be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument), including a prepaid debit card or prepaid debit card account number. 18 U.S.C. § 1029(e)(1).

11. A “prepaid debit card” is a card linked to an account at a financial institution, which could be used to receive deposits electronically, like a traditional bank account, and to make purchases and cash withdrawals with funds in the account, like a traditional debit card. Prepaid debit cards are administered through many providers, including but not limited to Green Dot Bank.

12. A “disposable email address” is an email address that is given to specified senders and typically used to forward incoming emails to one or more permanent email addresses where the owner receives and reads messages. A disposable email address may be used as a means of shielding a permanent email address from senders and it can protect the integrity of a permanent email address because the disposable address may be canceled at any time without the owner changing his or her permanent email address.

THE CONSPIRACY

13. Beginning at least as early as tax year 2012, the exact date being unknown to the Grand Jury, and continuing to the present, in the District of Oregon and elsewhere, defendants

EMMANUEL OLUWATOSIN KAZEEM, OLUWATOBI RUEBEN DEHINBO, LATEEF

AINA ANIMAWUN, OLUWASEUNARA TEMITOPE OSANYINBI, and OLUWAMUYIWA ABOLAD OLAWOYE, unlawfully and knowingly conspired and agreed with each other and with persons both known and unknown to the Grand Jury, to commit the following offenses, in violation of Title 18, United States Code, Section 1349:

- a. Mail Fraud – To knowingly and willfully use or cause the use of the United States mails or private or commercial interstate carrier in furtherance and execution of a material scheme or artifice to defraud and obtain money by means of materially false and fraudulent pretenses and representations in violation of Title 18, United States Code, Section 1341; and,
- b. Wire Fraud – To knowingly and willfully transmit and cause to be transmitted by means of interstate and foreign wire commerce any writings in furtherance and execution of a material scheme or artifice to defraud and obtain money by means of materially false and fraudulent pretenses and representations in violation of Title 18, United States Code, Section 1343.

Objects Of The Conspiracy/Scheme to Defraud

14. It was the object of the conspiracy and the scheme to defraud to obtain stolen PII and use that identifying information, as well as false information relating to employment and income, for the purpose of preparing and electronically filing fraudulent tax returns with the Internal Revenue Service and the Oregon Department of Revenue claiming fraudulent refunds. It was also an object of the conspiracy to obtain the fraudulent refunds associated with those fraudulent returns through direct deposits to debit cards fraudulently registered with the stolen PII and through direct deposit to third party personal bank accounts.

Stolen Identity Information

15. It was part of the conspiracy that the defendants and their co-conspirators obtained the names and other personal identifying information that belonged to United States taxpayers, without their knowledge or consent, by unauthorized means including the purchase of the stolen information. The stolen PII belonged to over 125,000 people and included stolen PII originating from a database owned by a pre-employment and volunteer background check company located in Oregon (the "Oregon Database").

16. It was a further part of the conspiracy that the defendants and their co-conspirators, using email and instant messenger accounts, exchanged hundreds of communications containing the stolen social security numbers and other PII of over 88,000 individuals whose information originated from the Oregon Database. This included over 38,000 residents from Oregon. Some of the specific emails exchanged as part of the conspiracy included the following:

- a. On or about September 15, 2013, defendants **KAZEEM**, **ANIMAWUN**, and **DEHINBO**, along with other co-conspirators, exchanged emails containing stolen PII for Oregon resident J.W.;
- b. On or about September 25, 2013, defendants **KAZEEM** and **ANIMAWUN**, along with other co-conspirators, exchanged emails containing stolen PII for Oregon residents M.E. and R.F.;
- c. On or about March 26, 2014, defendants **KAZEEM** and **OSANYINBI**, along with other co-conspirators, exchanged emails containing stolen PII for Nevada resident C.M. and Oregon resident D.B.;
- d. On or about March 22, 2014, defendants **OLAWOYE** and **OSANYINBI** exchanged emails containing stolen PII for Washington resident H.M. and Oregon

resident W.C. On or about April 5, 2014, defendants **OSANYINBI** and **DEHINBO** exchanged instant messages containing stolen PII for H.M.;

- e. On or about March 22, 2014, defendants **OLAWOYE** and **OSANYINBI** exchanged emails containing stolen PII for Oregon resident B.M.

17. It was a further part of the conspiracy that each defendant obtained the following number of stolen identities for use in carrying out their fraudulent scheme:

- a. **KAZEEM**: over 111,800 (with over 77,000 from the Oregon Database and over 37,600 of those belonging to residents of Oregon);
- b. **DEHINBO**: over 5,800 (with over 4,600 from the Oregon Database and over 2,100 of those belonging to residents of Oregon);
- c. **ANIMUWAN**: over 20,200 (with over 8,700 from the Oregon Database and over 4,000 of those belonging to residents of Oregon);
- d. **OSANYINBI**: over 16,400 (with over 11,800 from the Oregon Database and over 4,800 of those belonging to residents of Oregon);
- e. **OLAWOYE**: over 5,200 (with over 2,800 from the Oregon Database and over 1,300 of those belonging to residents of Oregon).

Electronic Filing PINs

18. It was part of the conspiracy that the co-conspirators used the stolen PII to obtain Electronic Filing PINs from the Internal Revenue Service.

19. It was a further part of the conspiracy that the Electronic Filing PINs were acquired in the names of individuals whose PII was stolen for subsequent use in obtaining prepaid debit cards and filing fraudulent tax returns in their names.

Prepaid Debit Cards

20. It was part of the conspiracy that the co-conspirators obtained debit and/or other stored value cards for the purpose of receiving direct deposits of fraudulent tax refunds including, but not limited to, Green Dot debit cards issued by Green Dot Bank, a financial institution.

21. It was a further part of the conspiracy that the co-conspirators purchased Green Dot temporary prepaid debit cards at various retail locations. In order to receive direct deposit funds, including the direct deposit of federal and state tax refunds, the co-conspirators “personalized” the cards by registering them with Green Dot, as required. As part of the registration process, they provided Green Dot with stolen PII including the names and mailing addresses of those individuals resulting in Green Dot mailing personalized-registered cards via U.S. mail to the mailing addresses and in the registered names provided by the co-conspirators. Upon registration, and in order to receive direct deposits of tax refunds, the co-conspirators also obtained the Green Dot Bank routing number and the Direct Deposit Account number created from the Primary Card Reference number linked to the number embossed on both the original-temporary card and the personalized-registered card.

Disposable Email Addresses

22. It was part of the conspiracy that the co-conspirators used disposable email addresses, created through disposable email service provider 33Mail.com, for use in filing fraudulent tax returns, registering prepaid debit cards in the names of the individuals whose PII was stolen, and to further conceal their fraudulent scheme. As part of the conspiracy, for the 2013 and 2014 tax years, these included three 33Mail.com email forwarding addresses that were used to file approximately 261 fraudulent federal tax returns claiming fraudulent refunds in excess of \$2.3

million dollars. The actual loss exceeded \$748,000 from tax returns accepted for payment by the IRS.

23. It was a further part of the conspiracy that the co-conspirators also used disposable email addresses to receive communication from TurboTax (regarding electronically filed returns) and Green Dot (regarding registration of prepaid debit cards in the names of individuals who had their PII stolen) including, but not limited to, the use of the disposable email account BRAALLEMA34@sesXXX.33mail.com as follows:

- a. On or about March 23, 2014, to receive an email confirmation from TurboTax regarding an Oregon state tax return and federal tax return fraudulently filed in the name of Oregon resident B.M. This disposable email account was forwarded to sesXXX@yahoo.com, an email account used by ANIMAWUN and the other co-conspirators in the identity theft scheme; and,
- b. On or about March 22, 2014, to create a Green Dot user ID and request a personalized Green Dot debit card in the name of Oregon resident B.M. On or about March 25, 2014, Green Dot mailed the personalized-registered debit card to an address in Hermiston, Oregon associated with Oregon resident B.M.

24. It was a further part of the conspiracy that the co-conspirators continued to use some of the same 33Mail.com disposable email addresses in 2015 in association with filing fraudulent 2014 tax year federal returns seeking refunds of over \$1.3 million dollars.

Obtaining Fraudulent Refunds

25. It was part of the conspiracy that the co-conspirators electronically filed false and fraudulent individual tax returns with the IRS and the Oregon Department of Revenue in Salem, Oregon claiming that fraudulent tax refunds were owed.

26. It was a further part of the conspiracy that the co-conspirators used the stolen names and other PII to create the fraudulent income tax returns and false Form W-2 Wage and Tax statements, which contained fictitious information regarding employment, wages, withholding, and tax credits. Whenever the co-conspirators filed a fraudulent tax return that was rejected by the IRS for payment, the co-conspirators often created another fraudulent tax return after changing some of the information from the initial rejected return and refiled the newly created return in an effort to have it accepted for payment.

27. It was a further part of the conspiracy that the co-conspirators used the Electronic Filing PINs they had acquired in the names of the individuals who had their PII stolen to file fraudulent federal tax returns and Oregon Department of Revenue tax returns. As part of the conspiracy, it included filing approximately 724 fraudulent federal tax returns for tax year 2013 with the Electronic Filing PINs claiming fraudulent refunds in excess of \$4.2 million dollars. The actual loss exceeded \$1.2 million dollars from tax returns accepted for payment by the IRS.

28. It was a further part of the conspiracy that the co-conspirators acquired and used hundreds of Green Dot debit cards using the stolen PII to receive fraudulent tax refunds. The co-conspirators included the Direct Deposit Account number along with a Green Dot Bank routing number provided to them at the time of registration on the fraudulently filed tax return to initiate the direct deposit of the fraudulent refunds to the Green Dot Account. The co-conspirators subsequently accessed those funds from the original-temporary card.

29. It was a further part of the conspiracy that the co-conspirators exchanged information regarding the Green Dot account numbers and the anticipated fraudulent tax refunds associated with those accounts including, but not limited to, an email sent from **ANIMAWUN** to **OLAWOYE** on or about March 23, 2014, in which the co-conspirators passed information

pertaining to fourteen Green Dot cards with over \$120,000 of scheduled fraudulent refunds to be deposited on the Green Dot accounts associated with the cards.

30. It was a further part of the conspiracy that the co-conspirators passed information in coordination with the acquisition of Green Dot debit cards, the filing of fraudulent tax returns and the obtaining of fraudulent refunds including, but not limited to the following:

- a. On March 26, 2014, **KAZEEM** emailed the stolen PII of Nevada resident C.M. and Oregon resident D.B. contained in the Oregon Database to **OSANYINBI**.
- b. On or about March 26, 2014, the co-conspirators purchased a temporary Green Dot card at a CVS retail outlet.
- c. On or about March 27, 2014, at a co-conspirator's direction, using the 33Mail.com account associated with **ANIMAWUN**, registered that temporary Green Dot card in the name of C.M. whereupon Green Dot mailed the personalized Green Dot card to C.M. at the Portland, Oregon address associated with D.B. pursuant to the co-conspirator's direction.
- d. On March 28, 2014, the co-conspirators filed a fraudulent federal return in the names of C.M. and D.B. The fraudulent return contained accurate stolen PII for both C.M. and D.B. and claimed a \$9,943 refund to be directly deposited into the account associated with the Green Dot card registered in the name of C.M. After the IRS paid the refund, the co-conspirators withdrew and wired the funds using the original-temporary Green Dot card still in their possession.

31. It was a further part of the conspiracy that the co-conspirators, to facilitate the receipt and withdrawal of fraudulent tax refunds, also directed some fraudulent tax refunds be deposited into third party bank accounts unaffiliated with the identity of the individual who had their PII stolen

and tax return filed in their name including, but not limited to, a 2013 state tax return filed on or about April 15, 2014, with the Oregon Department of Revenue which directed the refund purportedly owed to Oregon resident D.P. and Washington resident D.D. to be deposited into an account at the Central Wisconsin Credit Union, a financial institution, opened in late January 2014. Before filing the fraudulent return, and as part of the conspiracy, the stolen PII of D.D. and others was shared between the named co-conspirators on at least the following dates:

- a. On or about November 6, 2013, **KAZEEM** emailed PII to **DEHINBO**;
- b. On or about February 27, 2014, **KAZEEM** emailed PII to **ANIMAWUN**;
- c. On or about February 27, 2014 and March 5, 2014, **ANIMAWUN** emailed PII to an unnamed co-conspirator;
- d. On or about March 4, 2014, an unnamed co-conspirator emailed PII to **ANIMAWUN**;
- e. On or about April 27, 2014, **KAZEEM** emailed PII to **OSANYINBI**.

32. It was a further part of the conspiracy that the co-conspirators retrieved the acquired fraudulent tax refunds from the debit and/or stored value cards through various purchases, including the purchase of money orders or wire transfers payable to the co-conspirators and converted cash and money orders for the personal use of the co-conspirators.

33. It was a further part of the conspiracy that the co-conspirators retrieved the acquired fraudulent tax refunds from the third party bank accounts through withdrawals including ATM withdrawals.

34. Defendants and their co-conspirators took steps to conceal the existence of the conspiracy.

Additional Overt Acts in Furtherance of the Conspiracy

35. In furtherance of the conspiracy, and to effect, promote and accomplish the objects of it, defendants **EMMANUEL OLUWATOSIN KAZEEM, OLUWATOBI RUEBEN DEHINBO, LATEEF AINA ANIMAWUN, OLUWASEUNARA TEMITOPE OSANYINBI, and OLUWAMUYIWA ABOLAD OLAWOYE**, and other persons known and unknown to the Grand Jury, caused to be committed, among others, the use of the United States mail, or private or commercial interstate carrier, set forth in Counts 2 through 8 of this Indictment, incorporated herein by this reference.

36. In furtherance of the conspiracy, and to effect, promote and accomplish the objects of it, defendants **EMMANUEL OLUWATOSIN KAZEEM, OLUWATOBI RUEBEN DEHINBO, LATEEF AINA ANIMAWUN, OLUWASEUNARA TEMITOPE OSANYINBI, and OLUWAMUYIWA ABOLAD OLAWOYE**, and other persons known and unknown to the Grand Jury, committed and caused to be committed, among others, the interstate and/or foreign wire transmission of Oregon Department of Revenue tax returns set forth in Counts 9 through 14 of this Indictment, incorporated herein by this reference.

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

COUNTS 2-8

(MAIL FRAUD)

37. Paragraphs 1 through 34 of the Indictment are re-alleged and incorporated herein by reference.

38. On or about the dates listed below, in the District of Oregon and elsewhere, defendants **EMMANUEL OLUWATOSIN KAZEEM, OLUWATOBI RUEBEN DEHINBO, LATEEF AINA ANIMAWUN, OLUWASEUNARA TEMITOPE OSANYINBI, and**

OLUWAMUYIWA ABOLAD OLAWOYE, together with persons known and unknown to the Grand Jury, having knowingly and intentionally devised a material scheme and artifice to defraud the Internal Revenue Service and obtain money from the United States Treasury by means of materially false and fraudulent pretenses and representations, and for the purpose of executing the aforementioned material scheme and artifice, and attempting to do so, did knowingly cause debit cards, as described below, to be placed in a post office and authorized depository for mail matter, and delivered by the United States Postal Service (USPS) or private or commercial interstate carrier to the mailing addresses described below, each use of the mails being a separate count of this Indictment:

Count	Date of Offense	Mailing
2	On or about 04/01/2013	Debit card in the name of P.J., addressed to P.J. in Medford, Oregon.
3	On or about 09/26/2013	Debit card in the name of J.W., addressed to J.W. in Eugene, Oregon.
4	On or about 10/08/2013	Debit card in the name of M.E., addressed to M.E. in West Linn, Oregon.
5	On or about 03/22/2014	Debit card in the name of B.M., addressed to B.M. in Hermiston, Oregon.
6	On or about 03/24/2014	Debit card in the name of H.M., addressed to H.M. in Portland, Oregon.
7	On or about 03/27/2014	Debit card in the name of C.M., addressed to C.M. in Portland, Oregon.
8	On or about 04/19/2014	Debit card in the name of J.E., addressed to J.E. in Clackamas, Oregon.

All in violation of Title 18, United States Code, Section 1341.

COUNTS 9-14

(WIRE FRAUD)

39. Paragraphs 1 through 34 of the Indictment are re-alleged and incorporated herein by reference.

40. On or about the dates listed below, in the District of Oregon and elsewhere, defendants **EMMANUEL OLUWATOSIN KAZEEM, OLUWATOBI RUEBEN DEHINBO, LATEEF AINA ANIMAWUN, OLUWASEUNARA TEMITOPE OSANYINBI**, and **OLUWAMUYIWA ABOLAD OLAWOYE**, together with persons known and unknown to the Grand Jury, having knowingly and intentionally devised a material scheme and artifice to defraud the Oregon Department of Revenue and obtain money from the State of Oregon by means of materially false and fraudulent pretenses and representations, and for the purpose of executing the aforementioned material scheme and artifice, and attempting to do so, did knowingly cause false state of Oregon tax returns using stolen identity information of an actual person known to the Grand Jury, listed by his or her initials below, to be transmitted and caused to be transmitted in interstate and/or foreign commerce by means of wire communication, as more particularly described below, each use of the wires being a separate count of this Indictment:

Count Number	Date of Offense	Description of Wire
9	04/13/2013	Oregon Department of Revenue tax return, including copy of federal tax return, electronically filed in the names of P.J. and V.M.
10	05/14/2013	Oregon Department of Revenue tax return, including copy of federal tax return, electronically filed in the names of R.W. and P.T.
11	03/23/2014	Oregon Department of Revenue tax return, including copy of federal tax return, electronically filed in the names of B.M. and G.H.
12	04/01/2014	Oregon Department of Revenue tax return, including copy of federal tax return, electronically filed in the names of R.B. and A.M.
13	04/15/2014	Oregon Department of Revenue tax return, including copy of federal tax return, electronically filed in the names of D.P. and D.D.

14	07/26/2014	Oregon Department of Revenue tax return, including copy of federal tax return, electronically filed in the names of S.T. and M.J.
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All in violation of Title 18, United States Code, Section 1343.

COUNTS 15-27

(AGGRAVATED IDENTITY THEFT)

41. On or about the dates listed below, in the District of Oregon and elsewhere, defendants **EMMANUEL OLUWATOSIN KAZEEM, OLUWATOBI RUEBEN DEHINBO, LATEEF AINA ANIMAWUN, OLUWASEUNARA TEMITOPE OSANYINBI,** and **OLUWAMUYIWA ABOLAD OLAWOYE,** together with persons known and unknown to the Grand Jury, did knowingly possess, transfer and use, without lawful authority, the means of identification of another person including the name, Social Security number, and other stolen personal identifying information of an actual person known to the Grand Jury, listed by his or her initials below, during the registration process of prepaid debit cards that occurred during and in relation to the commission of a federal felony enumerated in 18 U.S.C. § 1028A(c), to wit: mail fraud and conspiracy to commit mail fraud in violation of Title 18, United States Code, Sections 1341 and 1349 as alleged in the related fraud Counts of this Indictment referenced below, each use of the mails being a separate count of this Indictment:

Count	Date of Offense	Related Fraud Counts	Individual
15	On or about 04/01/2013	1 and 2	P.J.
16	On or about 09/26/2013	1 and 3	J.W.
17	On or about 10/08/2013	1 and 4	M.E.
18	On or about 03/22/2014	1 and 5	B.M.

19	On or about 03/24/2014	1 and 6	H.M.
20	On or about 03/27/2014	1 and 7	C.M.
21	On or about 04/19/2014	1 and 8	J.E.

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

42. On or about the dates listed below, in the District of Oregon and elsewhere, defendants **EMMANUEL OLUWATOSIN KAZEEM, OLUWATOBI RUEBEN DEHINBO, LATEEF AINA ANIMAWUN, OLUWASEUNARA TEMITOPE OSANYINBI,** and **OLUWAMUYIWA ABOLAD OLAWOYE,** together with persons known and unknown to the Grand Jury, did knowingly possess, transfer and use, without lawful authority, the means of identification of another person including the name, Social Security number, and other stolen personal identifying information of an actual person known to the Grand Jury, listed by his or her initials below, while electronically filing false Oregon Department of Revenue tax returns, which each included a copy of a false federal tax return, during and in relation to the commission of a federal felony enumerated in 18 U.S.C. § 1028A(c), to wit: wire fraud and conspiracy to commit wire fraud in violation of Title 18, United States Code, Sections 1343 and 1349 as alleged in the related fraud Counts of this Indictment referenced below, each use of the wires being a separate count of this Indictment:

Count	Date of Offense	Related Fraud Counts	Individuals
22	04/13/2013	1 and 9	P.J. and V.M.
23	05/14/2013	1 and 10	R.W. and P.T.
24	03/23/2014	1 and 11	B.M. and G.H.
25	04/01/2014	1 and 12	R.B. and A.M.

26	04/15/2014	1 and 13	D.P. and D.D.
27	07/26/2014	1 and 14	S.T. and M.J.

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

FORFEITURE ALLEGATION

43. Upon conviction of one or more of the offenses set forth in Counts 1 through 14 of this Indictment, defendants **EMMANUEL OLUWATOSIN KAZEEM, OLUWATOBI RUEBEN DEHINBO, LATEEF AINA ANIMAWUN, OLUWASEUNARA TEMITOPE OSANYINBI, and OLUWAMUYIWA ABOLAD OLAWOYE** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2) and Title 28 United States Code, Section 2461(c), any and all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations.

Dated this 7th day of May 2015.

A TRUE BILL.



Presented by:
S. AMANDA MARSHALL
United States Attorney



BYRON CHATFIELD
Assistant United States Attorney



NANCY M. OLSON
Assistant United States Attorney