

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA : INDICTMENT
:
- v. - : 21 Cr.
:
DRAMION COOMBS, :
OLUFEMI NATHANIEL ITIOWE, :
TANZANIA HOGAN, and :
DEIBI SANCHEZ, :
:
Defendants. :
:
- - - - - X

COUNT ONE

(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

1. From at least in or about September 2018 up to and including at least in or about November 2018, in the Southern District of New York and elsewhere, DRAMION COOMBS, OLUFEMI NATHANIEL ITIOWE, TANZANIA HOGAN, and DEIBI SANCHEZ, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and object of the conspiracy that DRAMION COOMBS, OLUFEMI NATHANIEL ITIOWE, TANZANIA HOGAN, and DEIBI SANCHEZ, the defendants, and others known and unknown,

willfully and knowingly, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Bank Fraud)

The Grand Jury further charges:

3. From at least in or about September 2018 up to and including at least in or about November 2018, in the Southern District of New York and elsewhere, DRAMION COOMBS, OLUFEMI NATHANIEL ITIOWE, TANZANIA HOGAN, and DEIBI SANCHEZ, the defendants, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses,

representations, and promises, to wit, COOMBS, ITIOWE, HOGAN, and SANCHEZ deposited false and fraudulent checks totaling more than \$890,000 in the names of at least three different victims into bank accounts at financial institutions in New York and California, and then withdrew funds to which they were not entitled.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE

(Aggravated Identity Theft)

The Grand Jury further charges:

4. From at least in or about September 2018 up to and including at least on or about November 2018, in the Southern District of New York and elsewhere, DRAMION COOMBS, OLUFEMI NATHANIEL ITIOWE, TANZANIA HOGAN, and DEIBI SANCHEZ, the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, COOMBS, ITIOWE, HOGAN, and SANCHEZ used the names, purported signatures, and other identifying information of multiple individuals for the purpose of furthering a scheme to deposit false and fraudulent checks, during and relation to the conspiracy to commit bank fraud and bank fraud offenses charged in Counts One and Two of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),

1028A(b), and 2.)

COUNT FOUR

(Bank Fraud)

The Grand Jury further charges:

5. From at least in or about December 2019 up to and including at least in or about July 2020, in the Southern District of New York and elsewhere, DRAMION COOMBS, the defendant, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, COOMBS deposited more than \$11,000 worth of false and fraudulent checks into his own bank account and a separate bank account that he opened in the name of another individual, and then withdrew funds to which he was not entitled.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT FIVE

(Aggravated Identity Theft)

The Grand Jury further charges:

6. From at least in or about December 2019 up to and

including at least on or about July 2020, in the Southern District of New York and elsewhere, DRAMION COOMBS, the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, COOMBS used the names, purported signatures, and other identifying information of multiple individuals for the purpose of furthering a scheme to deposit false and fraudulent checks, during and relation to the bank fraud offense charged in Count Four of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),
1028A(b), and 2.)

FORFEITURE ALLEGATION

7. As a result of committing the offenses alleged in Counts One and Two of this Indictment, DRAMION COOMBS, OLUFEMI NATHANIEL ITIOWE, TANZANIA HOGAN, and DEIBI SANCHEZ, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

8. As a result of committing the offense alleged in Count

Four of this Indictment, DRAMION COOMBS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

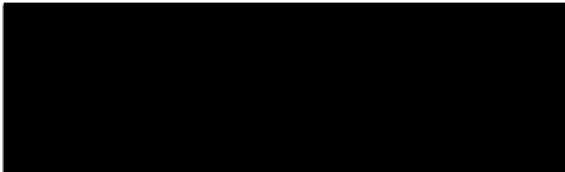
9. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON

A handwritten signature in cursive script, reading "Audrey Strauss", written over a horizontal line.

AUDREY STRAUSS
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DRAMION COOMBS,
OLUFEMI NATHANIEL ITIOWE,
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Defendants.

INDICTMENT

21 Cr.

(18 U.S.C. §§ 1349, 1344, 1028A, and
2.)

AUDREY STRAUSS

United States Attorney


Foreperson
