



“JAMES,” (“RAJI”), and AKOLADE OJO, a/k/a “KOLA,” a/k/a “BOOGZ,” (“OJO”) (collectively the “**Defendants**”), were foreign nationals living in the United States.

2. The **Defendants** were residents of Baltimore County, Maryland.

3. Adewumi Abioye (“ABIOYE”), Hameed Adesokan (“ADESOKAN”), Lukman Salam (“SALAM”), and Person D were foreign nationals living in the United States and C.P. was a real person living in Indiana.

4. Bangalan Exclusive LLC, Geotrics Global LLC, Geotric Global LLC, Bouken Services LLC, Buchaz Crystal LLC, Trask International LLC, Benkut Concept LLC, Apex Auto Brokers LLC, CP Logistics LLC, and Annytee Global Logistics were limited liability companies or doing business as entities used by the **Defendants** and their co-conspirators.

5. Victims TA and JS were individuals that lived in the United States. Victim Businesses VW, Q, N, A Inc., C, SIS, VD, SC, A LLC, TAC, and NQ were U.S. companies that had employees, operations, assets, and debts.

6. Bank of America (“Bank of America”), Branch Banking and Trust Company (“BB&T”), Citibank (“Citi”), First National Bank (“FNB”), J.P. Morgan Chase, N.A. (“JPM”), PNC Bank (“PNC”), State Employees Credit Union (“SECU”), SunTrust Bank (“SunTrust”), TD Bank N.A. (“TD Bank”), Truist Financial Corporation (“Truist”), Wells Fargo Bank, N.A. (“Wells Fargo”), and Woodforest National Bank (“Woodforest”) were financial institutions as defined in 18 U.S.C. § 20, and had physical branches, ATM machines, teller windows, and employees in Maryland. Central Valley Community Bank, U.S. Bank N.A. (“U.S. Bank”), and KeyBank were financial institutions as defined in 18 U.S.C. § 20 and headquartered outside

Maryland. All of these entities are hereinafter collectively referred to as the “Financial Institutions.”

7. The Financial Institutions maintained records concerning financial transactions in their accounts, including but not limited to records about the individuals controlling the accounts, and in some instances, surveillance video and/or images, and information about the identification documents used to open an account.

8. Financial institutions throughout the United States used a nine-digit number called a routing number along with a bank account number to determine the particular financial institution and account that should receive funds from a wire transfer. Similarly, financial institutions placed the routing number and account number on checks so a bank receiving a check deposit could draw on the funds and account from which the check was issued.

9. Zelle was a digital payments network owned by multiple financial institutions in the United States. Zelle allowed users to electronically transfer money from their bank account to another registered user’s bank account within the United States through a mobile device or online banking system.

10. Facebook, Inc., owns and controls an encrypted online platform called WhatsApp, which allowed users to send text and voice messages, communicate via voice and video calls, and share images, documents, user locations, and other media. Users provided a cellular mobile number when registering with the service.

**THE CONSPIRACY AND ITS OBJECTS**

11. From in or about August 2018, and continuing until on or about the date of this Indictment, in the District of Maryland and elsewhere,

**DAMILOLA LAWAL,  
a/k/a “DML,”  
a/k/a “D BABA,”  
a/k/a “DAMI” (“LAWAL”),**

**IDOWU ADEMOLA RAJI,  
a/k/a “ID,”  
a/k/a “KING SOSO,”  
a/k/a “JAMES,” (“RAJI”), and**

**AKOLADE OJO,  
a/k/a “KOLA,”  
a/k/a “BOOGZ” (“OJO”)**

the defendants herein, did knowingly and willfully combine, conspire, confederate and agree with each other, ABIOYE, ADESOKAN, SALAM, Person D, and with persons known and unknown to the Grand Jury, to knowingly and willfully devise and intend to devise a scheme and artifice to defraud victim businesses, individuals, and multiple financial institutions, to obtain money by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme to defraud, did knowingly and willfully transmit and cause to be transmitted by means of wire communications, in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, in violation of 18 U.S.C. § 1343.

**METHODS AND MEANS**

12. It was part of the conspiracy and scheme to defraud that the **Defendants** caused their co-conspirators to obtain and use false, forged, and counterfeited passports and other

identification documents that contained the facial images of co-conspirators, but not their real names.

13. It was further part of the conspiracy and scheme to defraud that the **Defendants** and their co-conspirators created and used limited liability companies (“LLCs”) for the purpose of hiding the identities of the **Defendants** and the co-conspirators and frustrating the efforts of victim businesses, individuals, multiple financial institutions, and law enforcement to identify and investigate the conspiracy and scheme to defraud.

14. It was further part of the conspiracy and scheme to defraud that the **Defendants’** co-conspirators visited the Financial Institutions and opened bank accounts in the names of LLCs and aliases. When opening accounts in the name of an LLC, often the only authorized signatory on the accounts was an alias or stolen identity used by the **Defendants’** and their co-conspirators.

15. It was further part of the conspiracy and scheme to defraud that the **Defendants’** co-conspirators made materially false and fraudulent pretenses, representations, and promises to victim businesses and individuals in order to obtain money, including but not limited to (a) falsely representing the payment information for a business vendor and (b) falsely representing the payment information for a real estate closing.

16. It was further part of the conspiracy and scheme to defraud that the **Defendants** worked to facilitate the conspiracy, acting as intermediaries between the co-conspirators directly deceiving and defrauding the victims, often through the use of computers, and the co-conspirators opening bank accounts with fake identification documents and engaging in financial transactions.

17. It was further part of the conspiracy and scheme to defraud that the **Defendants** learned information about financial transactions involving money obtained via fraud, and relayed that information to the co-conspirators who were directly interacting with the Financial Institutions.

18. It was further part of the conspiracy and scheme to defraud that in order to obtain the victims' money, the **Defendants** and their co-conspirators caused interstate and foreign wires, including but not limited to the following:

- a. Transactions at Bank of America branches located in Maryland, the District of Columbia, New Jersey, and other states that resulted in interstate wires;
- b. Transactions at TD Bank that resulted in foreign wires, including from Maryland to Ontario, Canada; and
- c. A transaction at a Capital One branch in Maryland, which resulted in an interstate wire communication from Maryland to Virginia, and other transactions at Capital One that resulted in interstate wire communications.

19. It was further part of the conspiracy and scheme to defraud that the **Defendants** caused their co-conspirators to withdraw and transfer money from bank accounts, purchase cashier's checks, and engage in other financial transactions.

20. It was further part of the conspiracy and scheme to defraud that **LAWAL** and **RAJI** accompanied co-conspirators to the general location where the co-conspirators conducted financial transactions, but **LAWAL** and **RAJI** did not enter Financial Institutions and avoided being captured on camera.

21. It was further part of the conspiracy and scheme to defraud that **LAWAL, RAJI,** and **OJO** engaged in interstate travel in furtherance of the conspiracy.

22. It was further part of the conspiracy and scheme to defraud that the **Defendants** obtained a portion of the money deposited into co-conspirators' bank accounts.

23. It was further part of the conspiracy and scheme to defraud that the **Defendants** and their co-conspirators communicated through WhatsApp, and thereby caused additional interstate wire communications.

24. It was further part of the conspiracy and scheme to defraud that the **Defendants** and their co-conspirators routinely erased phone data, including their WhatsApp messages, and on occasion changed their WhatsApp account to avoid detection by law enforcement.

25. It was further part of the conspiracy and scheme to defraud that the **Defendants** and their co-conspirators used WhatsApp messages to coordinate the timing of financial transactions, including directing members of the conspiracy regarding the deposit, withdrawal, transfer, and conversion of fraudulently obtained funds.

26. It was further part of the conspiracy and scheme to defraud that the **Defendants** and their co-conspirators collectively obtained and attempted to obtain more than \$3.5 million through materially false and fraudulent pretenses, representations, and promises.

#### **PARTICULAR TRANSACTIONS**

27. It was further part of the conspiracy and scheme to defraud that the **Defendants** and their co-conspirators undertook the acts described below in furtherance of the conspiracy.

#### **Victim TA**

28. On or about August 6, 2019, SALAM opened a bank account at TD ending in

7405 (“TD 7405”), in the name of Annytee Global Logistics, and with SALAM as the only signatory on TD 7405.

29. On or about September 17, 2019, a co-conspirator sent Victim TA a fraudulent email that falsely purported to be from Victim TA’s attorney, advising him to send a \$65,000 wire transfer to TD 7405 as part of a real estate purchase.

30. On or about September 17, 2019, **LAWAL** sent a WhatsApp message to SALAM with pictures of documents regarding the \$65,000 wire transfer. The pictures showed that the \$65,000 wire was being sent by Victim TA and listed a Citibank reference number.

31. On or about September 17, 2019, **LAWAL** sent a WhatsApp message to a co-conspirator that simply read “65k.”

32. On or about September 17, 2019, **LAWAL** attempted to talk to SALAM through a WhatsApp voice call.

33. On or about September 17, 2019, SALAM sent **LAWAL** WhatsApp messages with a screenshot with account balance details from TD 7405, and the message “Nothing yet.”

34. On or about September 18, 2019, SALAM alerted **LAWAL** that the \$65,000 wire transfer from Victim TA had been credited to TD 7405, sending a screenshot of TD 7405 that showed an available balance of \$65,006.38, based on a transfer and credit of \$65,000 from Victim TA.

35. On or about September 18, 2019, **LAWAL** sent a WhatsApp message to SALAM with the name “Bangalan Exclusive LLC,” which was a limited liability company controlled by ADESOKAN.

36. On or about September 18, 2019, **LAWAL** instructed SALAM to obtain a



cashier's check and make cash withdrawals, so SALAM could pay some of the cash to

**LAWAL.**

37. On or about September 18, 2019, SALAM used funds from TD 7405 to purchase a \$32,000 cashier's check made payable to Bangalan Exclusive LLC, which SALAM later deposited at Bank of America, resulting in an interstate wire communication.

38. On September 18, 2019, SALAM also made cash withdrawals from TD 7405, which resulted in a foreign wire communication.

**Victim Business VW**

39. In or about 2019, LAWAL arranged for ABIOYE to receive a false, forged, and counterfeit United Kingdom passport bearing ABIOYE's facial image and the name Michael Stone.

40. On or about August 21, 2019, ABIOYE used the Michael Stone passport to open a bank account at Wells Fargo ending in 9226 ("WF 9226"), in the name of Geotrics Global LLC ("Geotrics"). The only signatory on WF 9226 was Michael Stone, ABIOYE's alias on the counterfeit United Kingdom passport.

41. In or about September 2019, ABIOYE asked **OJO** for the opportunity to obtain fraudulent funds through a financial transaction arranged by **OJO**.

42. On or about September 20, 2019, a co-conspirator sent a fraudulent email that falsely purported to be from the Chief Executive Officer ("CEO") of Victim Business VW to the controller of Victim Business VW, instructing the controller to send \$48,375 to WF 9226.

43. On or about September 23, 2019, a co-conspirator sent Victim Business VW's controller a fraudulent email that falsely purported to be from Victim Business VW's CEO,

instructing the controller to send \$79,250 to WF 9226.

44. On or about September 25, 2019, a co-conspirator sent Victim Business VW's controller a fraudulent email that falsely purported to be from Victim Business VW's CEO, asking the controller to send \$84,300 to a Wells Fargo account ending in 1703 ("WF 1703"), which was registered to Bangalan Exclusive LLC, the LLC controlled by ADESOKAN.

45. In or about September 2019, ABIOYE purchased a \$74,500 cashier's check payable to Bangalan Exclusive LLC, and a \$24,000 cashier's check payable to Emerson Derek, an alias used by SALAM.

46. On or about September 24, 2019, ABIOYE deposited a \$74,500 cashier's check into a Capital One account ending in 3660 ("CO 3660"), resulting in an interstate wire communication from Maryland to Virginia.

47. On or about October 8-10, 2019, LAWAL sent a WhatsApp communication to ABIOYE to express his displeasure that ABIOYE had used WF 9226 for deposits without providing LAWAL with a portion of the fraud proceeds.

48. On or about October 9, 2019, LAWAL wrote to ABIOYE, "I will scare the hell out of u" and "I promise that" and then sent a video to ABIOYE.

#### **Victim JS**

49. In or about October 2019, ADESOKAN opened a bank account at JPM ending in 6098 ("JPM 6098"), which was in the name of Bangalan Exclusive LLC.

50. On or about December 6, 2019, a co-conspirator sent an email to Victim JS misrepresenting where Victim JS should send his payment for a real estate closing, and causing Victim JS to send an \$82,850 wire transfer to JPM 6098.

51. On or about December 9, 2019, ADESOKAN caused a \$41,000 wire transfer from JPM 6098 to a Bank of America account ending in 0749 (“BOA 0749”), which ABIOYE had opened using a fake identification document in the name Michael Stone.

52. On or about December 9, 2019, LAWAL sent ABIOYE a WhatsApp message about the \$41,000 wire transfer from JPM 6098 to BOA 0749.

53. On or about December 9, 2019, ABIOYE sent LAWAL a screen shot of transactions in BOA 0749, showing a balance of \$41,095.67.

54. On or about December 10, 2019, LAWAL and ABIOYE travelled together to Washington, D.C.

55. On or about December 10, 2019, ABIOYE conducted a \$34,000 wire transfer at Bank of America, which resulted in an interstate wire communication.

56. On or about December 10, 2019, at LAWAL’s direction, ABIOYE withdrew \$3,000 from BOA 0749, causing an interstate wire communication, and provided that money to LAWAL.

57. On or about December 11, 2019, ABIOYE withdrew \$8,000 in cash from BOA 0749, which resulted in interstate wire communications to and from Maryland.

**Victim Business Q**

58. In or about 2019, LAWAL arranged for ABIOYE to receive a false, forged, and counterfeit United Kingdom passport bearing ABIOYE’s facial image and the name Andrew Ali.

59. On or about April 1, 2019, ABIOYE opened a Wells Fargo account ending in 7022 (“WF 7022”), which was registered to Geotric Global LLC (“Geotric”), and listed Andrew Ali as the only signatory.

60. On or about June 11, 2019, **LAWAL** alerted **ABIOYE** that fraud proceeds were being sent to WF 7022.

61. On or about June 11, 2019, Victim Business Q sent a \$339,680.63 ACH transfer to WF 7022. Victim Business Q falsely believed it was paying a legitimate services vendor because it had received fraudulent emails, which falsely purported to be from the vendor, with payment instructions.

62. On or about June 11, 2019, using information supplied in part by **LAWAL**, **ABIOYE** used funds in WF 7022 to purchase cashier's checks for \$96,300.12 and \$89,700.20, payable to Bouken Services LLC and Buc Haz Crystal LLC ("Buc Haz"), respectively. The purchase of the cashier's checks caused interstate wire communications from Maryland to Alabama and Maryland to Minnesota, respectively.

63. On or about June 11, 2019, **ADESOKAN** gave the cashier's checks for \$96,300.12 and \$89,700.20 to **LAWAL**.

64. On or about June 11, 2019, **LAWAL**, **ABIOYE**, and **ADESOKAN** were all in Jersey City, New Jersey.

65. On or about June 12, 2019, the cashier's checks for \$96,300.12 and \$89,700.20 were deposited into Capital One accounts controlled by **ADESOKAN**, resulting in interstate wire communications.

**Victim Business N**

66. On or about October 22, 2019, a co-conspirator sent Victim Business N a fraudulent email that misrepresented how Victim Business N should pay a legitimate business that had provided it with a product, and thereby deceived Victim Business N into sending a wire

for \$85,963.22 to a JPM account ending in 7861 (“JPM 7861”).

67. On or about October 25, 2019, a \$38,000 check payable to Michael Stone was purchased from JPM 7861.

68. On or about October 25, 2019, **LAWAL** sent a WhatsApp message to **ABIOYE** that contained a photograph of the \$38,000 cashier’s check payable to Michael Stone. The message resulted in an interstate wire ending in Maryland.

69. On or about October 28, 2019, **ABIOYE** deposited the \$38,000 check payable to Michael Stone into BOA 0749, which resulted in interstate wire communications.

70. On or about October 28, 2019, **ABIOYE** used WhatsApp to send **LAWAL** a photograph of a bank receipt showing a \$38,000 deposit.

71. Between on or about October 26, 2019 and on or about November 2, 2019, **LAWAL** and **ABIOYE** exchanged multiple WhatsApp messages regarding mailings, bank account details, and financial transactions involving the proceeds of Victim Business N’s money, resulting in an interstate wire communications to and from Maryland.

72. On or about November 4, 2019, **ABIOYE** used funds from BOA 0749 to purchase a \$23,910.18 cashier’s check, resulting in an interstate wire communication from Maryland.

**Victim Business A Inc.**

73. On or about August 22, 2018, **SALAM** used a false, forged, and counterfeited passport, which was purportedly from the Republic of Ghana and in the name Matthew John, to open an account at BB&T ending in 0829 (“BB&T 0829”). The account was listed in the name Matthew John.

74. In or about October 2018, a co-conspirator sent Victim Business A Inc. fraudulent emails that falsely purported to come from an employee of an Arizona business that had provided Victim Business A Inc. with services. A co-conspirator fraudulently requested that Victim Business A Inc. pay the Arizona business by wiring money to BB&T 0829, which was in the name of SALAM's alias, Matthew John. As a result of the emails, Victim Business A Inc. sent approximately \$390,000 to BB&T 0829.

75. In or about October 2018, **RAJI** alerted SALAM to the money sent by Victim Business A Inc.

76. Between on or about October 5, 2018 and October 9, 2018, at **RAJI**'s direction, SALAM engaged in multiple financial transactions, including using funds in BB&T 0829 to purchase checks, make cash withdrawals, and engage in ATM and point of sale transactions using a debit card, all with the purpose of obtaining access to the fraudulently obtained funds in BB&T 0829 and concealing their further use.

77. On or about October 15, 2018, SALAM visited a BB&T branch located in Lower Merion, Pennsylvania, posing as Matthew John and presenting the false, forged, and counterfeit Matthew John passport. SALAM left BB&T without completing any transactions.

78. In or about October 2018, SALAM provided **RAJI** with a portion of the proceeds from the Victim Business A Inc. fraud and notified **RAJI** about the situation on October 15, 2018.

#### **Victim Business C**

79. In or about January 2020, **RAJI** arranged for Person D to receive a false, forged, and counterfeit driver's license that contained the name and date of birth of C.P., but the facial

image of Person D.

80. On or about January 23, 2020, **RAJI** caused CP Logistics LLC to be created by causing the filing of registration documents with the State of Maryland, which listed the Registered Agent for the LLC as C.P. and the LLC's address as 333 Marydale Avenue, Baltimore, Maryland 21229.

81. On or about January 24, 2020, Person D opened a PNC Bank account ending in 2923 ("PNC 2923"), which was registered to C.P. Logistics LLC and listed the real person with the initials C.P. as the only signatory. PNC 2923 records also contain the date of birth and social security number of the real person with the initials C.P.

82. On or about January 30, 2020, a co-conspirator sent fraudulent emails that falsely purported to be from a vendor of Victim Business C, and thereby caused Victim Business C to send a \$69,000 wire to PNC 2923.

83. On or about January 31, 2020, Person D posed as C.P. to engage in a point of sale financial transaction at a U.S. Post Office in Owings Mills, Maryland, resulting in an interstate wire communication from Maryland.

84. On or about February 3, 2020, Person D posed as C.P. and withdrew \$500 from an ATM in Owings Mills, Maryland, resulting in an interstate wire communication from Maryland.

85. In or about 2020, Person D returned the false, forged, and counterfeited driver's license with C.P.'s name and date of birth to **RAJI**.





























