FILED
CLERK, U.S. DISTRICT COURT
10/16/2024
CENTRAL DISTRICT OF CALIFORNIA
BY: ASI DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. ABIOLA FEMI QUADRI, Defendant.	No. 2:24-cr-00617-GW <u>I N F O R M A T I O N</u> [18 U.S.C. § 1349: Conspiracy to Commit Wire and Bank Fraud; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1349]

Beginning in or before 2021, and continuing through at least September 23, 2024, in Los Angeles County, within the Central District of California, and elsewhere, defendant ABIOLA FEMI QUADRI conspired with others to commit wire and bank fraud, in violation of Title 18, United States Code, Sections 1343 and 1344. The object of the conspiracy was carried out, and to be carried out, in substance, as follows: defendant QUADRI and his co-conspirators would steal the personal identifying information of victims, and apply for disability and unemployment benefits in their names through the California Employment Development

Department (“EDD”). Defendant QUADRI and his co-conspirators would counterfeit disability certifications purportedly issued by real doctors, whose identities were also stolen. Defendant QUADRI would receive the EDD debit cards, issued through Bank of America, which were credited with fraudulent benefits. Defendant QUADRI would then use the EDD debit cards at ATMs to withdraw in cash the benefits. As a result of this fraud, defendant QUADRI and his co-conspirators defrauded federally-insured financial institutions including Bank of America. Defendant QUADRI and his co-conspirators used interstate wires to defraud their victims throughout this conspiracy.

COUNT TWO

[18 U.S.C. § 1028A(a)(1)]

Beginning in or before 2021, and continuing through at least September 23, 2024, in Los Angeles County, within the Central District of California, and elsewhere, defendant ABIOLA FEMI QUADRI knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, including the names and account numbers of victims D.C., M.D., and R.T. on or about September 1, 2020, April 22, 2021, and May 1, 2021, during and in relation to a felony violation of Title 18, United States Code, Section 1349, Conspiracy to Commit Wire and Bank Fraud, as charged in Count One of this Information, knowing that the means of identification belonged to another actual person.

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

KRISTEN A. WILLIAMS
Assistant United States Attorney
Chief, Major Frauds Section

ANDREW BROWN
Assistant United States Attorney
Major Frauds Section