ZJN
2/10/2020

HMG: USAO#2019R00645

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA : **CRIMINAL NO.** SAG-20-052

v. : **(Conspiracy To Commit Wire Fraud, 18 U.S.C. § 1349; Forfeiture, 18 U.S.C. § 981(a)(1)(C); 21 U.S.C. § 853; 28 U.S.C. § 2461(c))**

ADEWUMI ABIOYE,
a/k/a "ANDREW ALI,"

HAMEED ADESOKAN,
a/k/a "DAVID BUCHA,"
a/k/a "KENNETH BOULAN," and

LUKMAN SALAM,
a/k/a "EMERSON DEREK,"

Defendants.

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INDICTMENT

CONSPIRACY TO COMMIT WIRE FRAUD

The Grand Jury for the District of Maryland charges:

INTRODUCTION

At times material to this Indictment:

1. Defendants **ADEWUMI ABIOYE ("ABIOYE"), a/k/a "ANDREW ALI," HAMEED ADESOKAN ("ADESOKAN"), a/k/a "DAVID BUCHA," a/k/a "KENNETH BOULAN," and LUKMAN SALAM ("SALAM"), a/k/a "EMERSON DEREK,"** were foreign nationals living in the United States.

2. **ABIOYE** was a resident of Maryland, **ADESOKAN** was a resident of New Jersey, and **SALAM** was a resident of Delaware.

3. Bank of America, Wells Fargo, Santander, JP Morgan Chase, TD Bank, and Capital One are all financial institutions as defined in 18 U.S.C. § 20 (collectively referred to as "Financial Institutions"), which had physical branches, ATM machines, teller windows, employees, and in some instances, drive-through car teller windows.

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

THE CONSPIRACY AND ITS OBJECTS

5. From in or about January 2019, and continuing until in or about January 2020, in the District of Maryland and elsewhere,

ADEWUMI ABIOYE,
a/k/a "ANDREW ALI,"

HAMEED ADESOKAN,
a/k/a "DAVID BUCHA,"
a/k/a "KENNETH BOULAN," and

LUKMAN SALAM,
a/k/a "EMERSON DEREK,"

the defendants herein, did knowingly and willfully combine, conspire, confederate and agree with each other, 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 the Financial Institutions, and 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

Fake Identification Documents

6. It was part of the conspiracy and scheme to defraud that the defendants obtained fake and fraudulent passports that contained the defendants' facial images, but not their real names.

7. It was further part of the conspiracy and scheme to defraud that **ABIOYE** possessed and used a fake and fraudulent passport in the name Andrew Ali.

8. It was further part of the conspiracy and scheme to defraud that **ADESOKAN** possessed and used fake and fraudulent passports in the names Kenneth Boulan and David Bucha.

9. It was further part of the conspiracy and scheme to defraud that **SALAM** possessed and used a fake and fraudulent passport in the name Emerson Derek.

Limited Liability Companies and "Doing Business As" Entities

10. It was further part of the conspiracy and scheme to defraud that **ABIOYE** and **ADESOKAN** created limited liability companies ("LLCs") for the purpose of hiding their identities and frustrating the efforts of the Financial Institutions and law enforcement to identify and investigate the conspiracy and scheme to defraud.

11. It was further part of the conspiracy and scheme to defraud that **ABIOYE** created and controlled LLCs named Geotric Global LLC ("Geotric") and Geotrics Global LLC ("Geotrics").

12. It was further part of the conspiracy and scheme to defraud that **ADESOKAN** created and controlled LLCs named Bouken Services ("Bouken") and Buchaz Crystal ("Buchaz").

13. It was further part of the conspiracy and scheme to defraud that **SALAM** used a doing business as ("d/b/a") entity named Annytee Global Logistics ("Annytee").

14. It was further part of the conspiracy and scheme to defraud that the defendants visited the Financial Institutions and opened bank accounts in the names of LLCs and a d/b/a entity that they used and controlled.

15. It was further part of the conspiracy and scheme to defraud that in or about March 2019, **ADESOKAN** opened bank accounts for Buchaz and Bouken at Santander Bank.

16. It was further part of the conspiracy and scheme to defraud that in or about April 2019, **ABIOYE** opened a bank account ending in 8006 ("BOA 8006") for Geotric at a Maryland Bank of America branch.

<u>The Co-Conspirators Obtained Money Through Fraud</u>

17. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators made materially false and fraudulent pretenses, representations, and promises to the victim businesses, individuals, and Financial Institutions, in order to obtain money.

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.

19. It was further part of the conspiracy and scheme to defraud that in or about June 2019, the co-conspirators caused a victim with the initials S.M. to send more than $10,000 to BOA 8006, resulting in a foreign wire communication.

20. It was further part of the conspiracy and scheme to defraud that the defendants received more than $750,000 in fraud proceeds in bank accounts that they controlled.

Additional Transactions

21. It was further part of the conspiracy and scheme to defraud that the defendants, their co-conspirators, and others, withdrew and transferred money from bank accounts, purchased cashier's checks, and engaged in other financial transactions.

22. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators engaged in financial transactions that caused interstate and foreign wire communications.

23. It was further part of the conspiracy and scheme to defraud that in or about June 2019, the co-conspirators caused multiple wires to be sent from Santander Bank, resulting in foreign wire communications.

24. It was further part of the conspiracy and scheme to defraud that in or about June 2019, **ADESOKAN** caused multiple financial transactions at Capital One, including more than $10,000 in cash withdrawals and account transfers, and a wire transfer of more than $10,000 that was for the benefit of Emerson Derek.

25. It was further part of the conspiracy and scheme to defraud that in or about September 2019, **SALAM** purchased a check from TD Bank for more than $25,000 that was made payable to Geotrics.

26. It was further part of the conspiracy and scheme to defraud that the defendants and their co-conspirators used and enjoyed the benefit of money obtained by fraud.

18 U.S.C. § 1349.

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the defendants' conviction on this Indictment.

Wire Fraud Forfeiture

2. Upon conviction of the offense in violation of Title 18, United States Code, Sections 1349 and 1343, as set forth in Count One of this Indictment,

ADEWUMI ABIOYE,
a/k/a "ANDREW ALI,"

HAMEED ADESOKAN,
a/k/a "DAVID BUCHA,"
a/k/a "KENNETH BOULAN," and

LUKMAN SALAM,
a/k/a "EMERSON DEREK,"

the defendants herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real or personal, which constitutes or is derived from proceeds traceable to the offenses, including but not limited to at least **$750,000 in U.S. currency** in the form of a money judgment.

Substitute Assets

3. If, as a result of any act or omission of the defendant, any such property subject to forfeiture,

(a) cannot be located upon the exercise of 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;

the United States, pursuant to pursuant to 21 U.S.C. § 853(p), shall be entitled to forfeiture of substitute property up to the value of the forfeitable property.

18 U.S.C. § 981(a)(1)(C)
21 U.S.C. § 853
28 U.S.C. § 2461(c)

Robert K Hur / hg
ROBERT K. HUR
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date: 2/11/2020