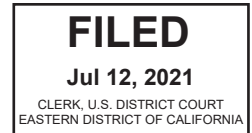


UNITED STATES DISTRICT COURT

for the
Eastern District of California



United States of America
v.

QUAZEEM OWOLABI ADEYINKA,
AYODEJI JONATHAN SANGODE, and
OLAMIDE YUSUF BAKARE

Case No. 2:21-mj-0112 CKD

SEALED

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June, 2020 to July, 2020 in the county of Sacramento and elsewhere in the
Eastern District of California, the defendant(s) violated:

Code Section
18 U.S.C. § 1349

Offense Description
Conspiracy to Commit Wire Fraud

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.

/s/

Complainant's signature

Special Agent John C. Collins
U.S. Department of Labor

Printed name and title

Sworn to before me and signed telephonically

Date: July 12, 2021 at 3:16 pm

City and state: Sacramento, California

Judge's signature

Carolyn K. Delaney, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANTS

I, Special Agent John Collins, being duly sworn, depose and state the following:

PURPOSE

1. I make this affidavit in support of a criminal complaint and arrest warrants for QUAZEEM OWOLABI ADEYINKA, AYODEJI JONATHAN SANGODE, and OLAMIDE YUSUF BAKARE (collectively, the “SUBJECTS”) for a violation of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud).

INTRODUCTION AND AGENT BACKGROUND

2. I am a Special Agent (SA) with the United States Department of Labor (DOL), Office of Inspector General (OIG), Office of Investigations-Labor Racketeering & Fraud in San Francisco, California, and have been so employed since September 2011. In May 2009, I earned a Master of Public Administration degree from the Robert F. Wagner Graduate School of Public Service at New York University in New York, NY. I am a graduate of the Federal Law Enforcement Training Center in Glynnco, Georgia. As a DOL SA, my duties include investigating fraud, waste, and abuse of various DOL programs. During my tenure as a SA, I have participated and conducted investigations of criminal activity including labor union investigations, theft of government funds, healthcare fraud, and other related financial crimes. I have participated in the execution of search and arrest warrants and have seized evidence of violations of federal law.

3. The facts and conclusions in this affidavit are based on my personal knowledge gained from my participation in this investigation, my training and experience, and information gained from other federal agents, local law enforcement, and field contacts and reports. Since this affidavit is submitted for the limited purpose of obtaining search warrants, I have not included all the facts of which I am aware in this investigation.

4. Where statements made by other individuals are referenced in this Affidavit, such statements are described in sum and substance and in relevant parts only. Similarly, where

information contained in reports and other documents or records is referenced in this Affidavit, such information is also described in sum and substance and in relevant parts only.

STATEMENT OF PROBABLE CAUSE

Summary of Probable Cause

5. The DOL-OIG, FBI, and California Employment Development Department (EDD) are conducting a joint investigation of a group of Maryland-based individuals, including the SUBJECTS, who are suspected of defrauding several state unemployment insurance systems, including California EDD. My and other agents' analysis of unemployment insurance data revealed a suspected fraud scheme in which a single apartment address located at 3217 75th Avenue, Apartment 203, Hyattsville, Maryland (the "75th Ave. Apartment"), received over 175 prepaid UI debit cards from the states of Arizona, California, Maryland, and North Carolina. The suspected dollar loss to the state of California is more than \$1.2 million with an attempted loss of more than \$2.6 million. The investigation then learned that the SUBJECTS vacated the 75th Avenue Apartment on or around October 31, 2020, and at least one subject relocated to 3420 Toledo Terrace, Apt. 230, Hyattsville, Maryland (the "Toledo Terrace Apartment"), where UI fraud is suspected to have continued, this time against the state of Maryland.

6. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that the SUBJECTS violated or aided and abetted a violation of at least 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud).

Unemployment Insurance and Pandemic Unemployment Assistance Programs and Associated Interstate Wires

7. Unemployment Insurance ("UI") is a state-federal program that provides monetary benefits to eligible lawful workers. Although state workforce agencies ("SWAs") administer their respective UI programs, they must do so in accordance with federal laws and regulations. UI payments ("benefits") are intended to provide temporary financial assistance to lawful workers who are unemployed through no fault of their own. Each state sets its own additional requirements for eligibility, benefit amounts, and length of time benefits can be paid.

Generally, UI weekly benefit amounts are based on a percentage of your earnings over a base period. In the State of California, the Employment Development Department (“EDD”) administers the UI program, which is based in Sacramento, California.

8. On March 13, 2020, the President declared the ongoing Coronavirus Disease 2019 (COVID-19) pandemic of sufficient severity and magnitude to warrant an emergency declaration for all states, tribes, territories, and the District of Columbia pursuant to section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121-5207 (the “Stafford Act”).

9. On March 18, 2020, the President signed the Families First Coronavirus Response Act (FFCRA) into law. The FFCRA provided additional flexibility for state UI agencies and additional administrative funding to respond to the COVID-19 pandemic. The Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law on March 27, 2020. It expanded states’ ability to provide UI for many workers impacted by COVID-19, including for workers who were not ordinarily eligible for UI benefits. The CARES Act provided for three new UI programs: Pandemic Unemployment Assistance (PUA); Federal Pandemic Unemployment Compensation (FPUC); and Pandemic Emergency Unemployment Compensation (PEUC).

10. The first program, PUA, provided for up to 39 weeks of benefits to individuals who were self-employed, seeking part-time employment, or otherwise would not qualify for regular UI or extended benefits under state or federal law or PEUC under section 2107 of the CARES Act. Coverage included individuals who had exhausted all rights to regular UC or extended benefits under state or federal law or PEUC. Under the PUA provisions of the CARES Act, a person who was a business owner, self-employed worker, independent contractor, or gig worker could qualify for PUA benefits administered by EDD if he/she previously performed such work in California and was unemployed, partially unemployed, unable to work, or unavailable to work due to a COVID-19 related reason. A PUA claimant was required to answer various questions to establish his/her eligibility for PUA benefits. For example, the claimant was

required to provide his/her name, Social Security Number (SSN), and mailing address. The claimant was also required to identify a qualifying occupational status and COVID-19 related reason for being out of work. The eligible timeframe to receive PUA was from weeks of unemployment beginning on or after January 27, 2020 through December 31, 2020.

11. The second program, PEUC, provided for up to 13 weeks of benefits to individuals who had exhausted regular UI under state or federal law, had no rights to regular UI under any other state or federal law, were not receiving UI under the UI laws of Canada, and were able to work, available for work, and actively seeking work. However, states were required to offer flexibility in meeting the “actively seeking work” requirement if individuals were unable to search for work because of COVID-19, including because of illness, quarantine, or movement restriction. The eligible timeframe to receive PEUC was from weeks of unemployment beginning after the respective state has an established agreement with the federal government through December 31, 2020. The earliest being April 5, 2020.

12. The third program, FPUC, provided individuals who were collecting regular UI, PEUC, PUA, and several other forms of UC with an additional \$600 per week. The eligible timeframe to receive PEUC was from weeks of unemployment beginning after the respective state had an established agreement with the federal government through July 31, 2020; the earliest being April 5, 2020.

13. On August 8, 2020, after FPUC expired, the President signed a Presidential Memorandum authorizing FEMA to use disaster relief funds pursuant to Section 408 Other Needs Assistance of the Stafford Act to provide supplemental payments for lost wages to help ease the financial burden on individuals who were unemployed as a result of COVID-19. The “Lost Wages Assistance Program” (LWAP) served as a temporary measure to provide an additional \$300 per week via a total of \$44 billion in FEMA funds. The period of assistance for LWAP was August 1, 2020 to December 27, 2020, or termination of the program, whichever was sooner.

14. In total, more than \$300 billion in additional federal funds for UI were appropriated in 2020. On December 27, 2020, the President signed a \$2.3 trillion COVID-19 Stimulus Bill that extended at least PUA, FPUC, and PEUC benefits through March 14, 2021. On March 11, 2021, the President signed the \$1.9 trillion coronavirus relief package that further extended these benefit programs through early September 2021.

15. In California, a UI claim can be filed online on the EDD website. When an individual files a UI claim, the EDD automatically maintains certain information regarding the filing of the claim. This information includes the date and time the claim was submitted, the name of the person for whom the claim was filed, and the IP address of the computer, or ISP account, that was used to file the claim.

16. UI claimants must answer various questions to establish their eligibility for UI benefits. Claimants must provide their name, Social Security Number, and mailing address. The claimants must also identify a qualifying occupational status and/or COVID-19 related reason for being out of work.

17. After EDD accepts a UI claim, the EDD transmits via electronic wire UI claim information to Bank of America (BoFA). EDD, using servers located in Rancho Cordova, California and Sacramento, California (in the Eastern District of California), sends claimant information and payment information to BoFA servers located in California. BoFA then conducts an interstate electronic wire transmission of this data to the servers of the card processor, Visa DPS, located in Virginia and Colorado.

18. EDD typically deposits UI funds every two weeks to an Electronic Bill Payment (EBP) debit card administered by BoFA, which claimants can use to pay for their expenses. The EBP card is sent via the U.S. Postal Service to the claimant at the address the claimant provides in their UI claim. Claimants can activate their debit card over the phone or online. To activate a card, a claimant must create a BoFA unemployment user profile, which captures certain data including, but not limited to, the EDD claim number, claimant SSN, address where card was mailed.

19. When receiving regular UI benefits, claimants must complete a Continued Claim Form (DE 4581) and certify every two weeks, under penalty of perjury, that they remain unemployed and eligible to receive UI benefits. EDD authorizes and deposits payment to the EBP debit card after it receives the Continued Claim Form. On or about April 23, 2020, California Secretary of Labor Julie Su directed the EDD to temporarily suspend the requirement for UI claimants to provide unemployment certifications (Continued Claim Forms) in order to prevent any unnecessary delays in dispensing benefit payments.

20. When the EDD needs to verify the identity of the claimant, an “ID Alert” is issued on a UI claim. When an ID Alert has been issued, the EDD sends the claimant a Request for Information (Form DE 1326E). The claimant must provide a clear copy of a government-issued ID and social security verification. With this information, the EDD will determine the claimant’s eligibility for UI benefits. The reasons why the claimant may be ineligible for UI benefits are the following: (a) Claimant did not respond to the DE 1326E; or (b) Documents provided were not clear to make an eligible determination; or (c) Documents provided were insufficient and did not prove the claimant’s identity.

21. In 2020, weekly UI benefits typically ranged from \$40 to \$450, not including federal CARES Act funding. In order to receive the maximum weekly benefit of \$450, a claimant must have earned \$11,674.01 or more in the highest quarter of the claimant’s base employment period.

22. The Unemployment Insurance is a federal-state program that is financed by employers who pay unemployment taxes based on employee wages paid to their workers. Part of the employers’ taxes goes directly to the federal government to pay for the administration of the UI Program. The greater portion goes into a special UI Trust Fund (UTF) from which benefit payments are made to workers who are unemployed. Each state has its own Unemployment Insurance (UI) trust fund within the United States Treasury. EDD’s accounting office, in Sacramento, California in the Eastern District of California, electronically requests these UI benefit funds via Fed Wire every day from the US Treasury, except weekends and state holidays.

EDD's accounting office submits documentation to the California State Controller's Office to prepare a warrant made payable to the BofA to cover the UI benefit payments that will be paid via electronic benefit payment process. The warrants are taken to the State Treasurer's Office, who makes the wire transfer payment to the BofA.

23. Based on my training and experience, I know that criminal actors:
 - a. Defraud the UI program by using stolen personally identifiable information ("PII") to file UI claims;
 - b. Conspire with other criminal actors to obtain stolen identities or to file fraudulent UI claims; and
 - c. Mask the Internet Protocol ("IP") address, or file fraudulent UI claims at various physical locations in order to conceal their identity.

Investigation Overview

24. Based on California EDD records, over 200 individual UI applications were filed with California EDD stating that the claimants' address was the 75th Avenue Apartment. Approximately 97 of the UI claims were approved by the EDD and funded a total of about \$1.2 million in UI benefits. According to an Internet search, this address appears to be an apartment in the Overland Gardens apartment complex, which advertises two- and three-bedroom units. Based on the size of the apartment, the investigation has concluded that a high number of UI applications associated with this address is unreasonable, and thus an indicator of fraudulent activity.

25. BofA records show that 142 UI claim profiles using the 75th Avenue Apartment address issued a total of 175 prepaid cards from the states of Arizona, California, Maryland, and North Carolina¹. These cards received over \$1.4 Million in UI benefit funds from at least four different state UI programs as indicated below:

¹ These are states that, like California, contracted with Bank of America to administer UI payments to claimants. Not all states UI payments are administered by Bank of America.

State	Claimant Address	ACH Credit Loads (approx.)
Arizona	3217 75th Avenue, Apartment 203, Hyattsville, Maryland	\$2,385
California	3217 75th Avenue, Apartment 203, Hyattsville, Maryland	\$1,271,504
Maryland	3217 75th Avenue, Apartment 203, Hyattsville, Maryland	\$158,658
North Carolina	3217 75th Avenue, Apartment 203, Hyattsville, Maryland	\$6,120

26. These funds were depleted through purchases, transfers, and ATM cash withdrawals conducted in California, Florida, and Maryland as indicated below:

Method	Amount (approx.)
Purchases	\$82,349.42
Transfers	\$181,954.08
ATM Cash Withdrawals	\$989,405.24

27. Records from state workforce agencies obtained by the DOL-OIG show that the 75th Avenue Apartment was also used to file for UI claims in the states of Hawaii, Louisiana, Massachusetts, Mississippi, Texas, Washington, and West Virginia. These states do not necessarily use BofA to disperse their UI funds and thus their benefit payouts would not be reflected in the BofA data provided to the investigation.

Background on the SUBJECTS

28. The following information details how the SUBJECTS resided in or used as an official address the 75th Avenue Apartment. The following facts also show that there is probable cause to believe that the SUBJECTS conspired to and participated in a scheme and artifice to defraud at least California EDD and the United States using interstate wires.

29. Based on the following facts, federal agents have determined that one or more of the below-identified SUBJECTS resided at the 75th Avenue Apartment between approximately May 2018 and October 2020, which was a location of criminal activity including UI fraud in 2020 during the time they resided there. Agents have also determined that at least ADEYINKA and SANGODE are currently the residents of the Toledo Terrace Apartment, which has been another location of criminal activity including UI fraud for much of 2020 and 2021.

30. SUBJECT Quazeem Owolabi ADEYINKA:

- a. Below is ADEYINKA's photo from his Maryland driver's license record:



FIGURE 1: ADEYINKA'S MARYLAND DRIVER'S LICENSE PHOTO

- b. According to a lease application for the Toledo Terrace Apartment, ADEYINKA rented 3217 75th Avenue, Apartment 203, Hyattsville, Maryland from May 1, 2018 to October 31, 2020.
- c. ADEYINKA is the registered owner of a 2019 Honda Civic with Maryland license plate PALMAS. This vehicle was registered to ADEYINKA at 3217 75th Avenue, Apartment 203, Hyattsville, Maryland effective October 18, 2019, through October 31, 2021. As of May 2021, this vehicle was still registered at 3217 75th Avenue, Apartment 203, Hyattsville, Maryland.
- d. From September 2019 to July 8, 2020, ADEYINKA had a Woodforest National Bank account ending in 0040 registered in his name and the 75th Avenue Apartment. Of the \$132,000 deposited into this account, over \$115,000 was via cash deposits.

- e. ADEYINKA's Maryland driver's license lists the 75th Avenue Apartment as his home address and describes him as a 20-year-old, 185 lb., 6'0" black male.
 - f. Records from the Prince George's County Police Department state that ADEYINKA filed a police report on December 1, 2019, stating that he lost his Nigerian passport and resided at the 75th Avenue Apartment.
 - g. According to the lease agreement for the Toledo Terrace Apartment, ADEYINKA began leasing the Toledo Terrace Apartment on November 19, 2020 and it expires on November 18, 2021.
 - h. Based on U.S. Postal Service records, in or about October 2020, "Quazee M Ade Yinka" [sic] requested that the U.S. Postal Service forward mail from the 75th Avenue Apartment to the Toledo Terrace Apartment.
31. SUBJECT Ayodeji Jonathan SANGODE:
- a. Below is SANGODE's photo from his Maryland driver's license record:



FIGURE 2: SANGODE'S MARYLAND DRIVER'S LICENSE PHOTO

- b. SANGODE is the registered owner of a 2016 Hyundai Elantra with Maryland license plate 3DS7400. This vehicle was registered to SANGODE at the 75th Avenue Apartment from April 2, 2019 to April 30, 2021. In May 2021, this vehicle's registration address changed to the Toledo Terrace Apartment.
- c. On or around March 23, 2021, "Ayode JI Jonatha Sangode" [sic] requested that the U.S. Postal Service forward mail from the 75th Avenue Apartment to the Toledo Terrace Apartment.
- d. SANGODE's Maryland driver's license lists the 75th Avenue Apartment as his home address and describes him as a 22-year-old, 156 lb., 5'7" black male. The driver's license current status is revoked and suspended due to various traffic offenses and failures to comply or appear to hearings.²

32. SUBJECT Olamide Yusuf BAKARE:

- a. Below is BAKARE's criminal booking photo from 2020:

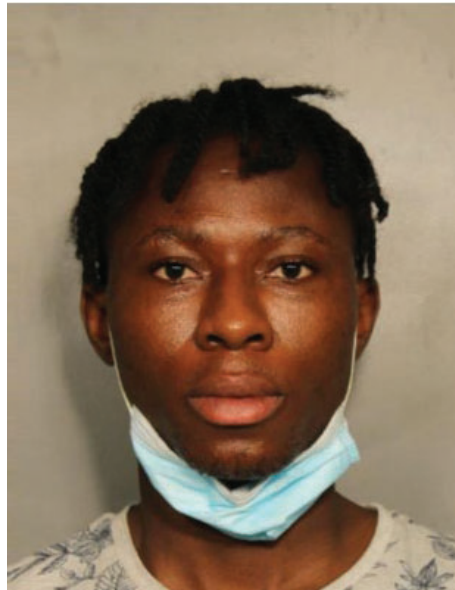


FIGURE 3: BAKARE'S BOOKING PHOTO FROM 2020

² On or around November 23, 2020, a State of Maryland Revocation Letter, presumably mailed to the 75th Avenue Apartment, was returned by the U.S. Postal Service.

- b. BAKARE had a Capital One bank account ending in 4397 registered in his name at 75th Avenue Apartment from February 15, 2020 until the account closed on September 23, 2020. Through this bank account, BAKARE made electronic transfers to SANGODE, ADEYINKA and others known and unknown to the investigation.
- c. On or about January 1, 2019, the Montgomery County Police Department arrested BAKARE on a misdemeanor charge for identity fraud by falsely representing himself as another person. On April 4, 2019, BAKARE pleaded guilty to this charge.³
- d. BAKARE's Maryland driver's license lists him as a 5'10", 160-pound black male. BAKARE's home address listed on the license is not known to be involved in the criminal scheme. As of June 2021, BAKARE's driver's license was suspended. The date or reason for that suspension is unknown.

Fraudulent UI Claims linked to the SUBJECTS at the 75th Avenue Apartment

33. In this investigation, BofA provided federal agents with banking transaction records for numerous BofA-EDD debit cards mailed to the 75th Avenue Apartment. Agents used this information to identify dates and times the debit cards were used at a BofA ATM. Agents then obtained BofA surveillance footage that showed the persons using the suspected fraudulent debit cards to conduct cash withdrawals. Unless otherwise stated, the below-identified ATM images are examples of the numerous surveillance images produced by BofA.⁴ As discussed above, EDD's approval and funding of the below-listed fraudulent UI claims

³ BAKARE also has an active warrant out of Montgomery County in Gaithersburg, Maryland, for failure to appear on a driving under the influence arrest on November 22, 2019.

⁴ BofA provided the investigation two dates and times for each transaction: the transaction times and the time the transaction was posted. The time zone of the transaction time reflects the local time zone of the transaction while the posted time is in Mountain Time. This Affidavit refers to the transaction time, but should still be considered approximate.

required interstate wires – wherein at least one originated from the Eastern District of California – involving at least Bank of America, and all occurring around the time of the claims’ submissions.

UI Claim Filed in Name of Identity-Theft Victim J.F.⁵

34. According to California EDD records, on or about July 12, 2020, a UI claim was filed with California EDD in the name of J.F. The claim was filed with an electronic device using IP Address 98.114.47.210 (a masked, untraceable IP address), and listed the 75th Avenue Apartment as J.F.’s mailing address. The claim further stated that J.F. worked as an “Account Administrative” before losing employment due to COVID-19. EDD approved the claim and began paying UI benefits on the claim on or around July 16, 2020, which required an interstate wire from the Eastern District of California in or about July 2020 to fund the BofA-EDD debit card.

35. Shortly after July 12, 2020, BofA mailed a BofA-EDD debit card ending in 9952 to the claimant and likely to the 75th Avenue Apartment that was on record with EDD.

36. Based on BofA records, on or around July 30, 2020, as shown below in ATM surveillance footage, SANGODE’s Hyundai (MD license plate 3DS7400) was surveilled at a BofA drive-through ATM located at 3413 Kenilworth Ave, Hyattsville, MD. The driver of the vehicle resembles SANGODE based on a comparison using his MD driver’s license photo.

[CONTINUED ON NEXT PAGE]

⁵ Identity-theft victim names are abbreviated throughout this Affidavit to protect their identities.



FIGURES 3 AND 5: BANK OF AMERICA RECORDS SHOWING ATM SURVEILLANCE PHOTOS AT 3413 Kenilworth Ave, Hyattsville, MD, ON JULY 30, 2020

37. According to BofA records, an ATM withdrawal of \$1,000 was made on July 30, 2020 at approximately 20:27 using a BofA-EDD debit card ending in 9952 and issued to J.F. The BofA records also show that the location of this transaction was at 3413 Kenilworth Avenue in Hyattsville, Maryland.

38. On or about August 28, 2020, EDD disqualified the J.F. UI claim due to the claimant's failure to respond to the EDD's ID Alert process. In total, EDD paid over \$16,000 in UI benefits to the BofA-EDD debit card ending in 0399 and issued to J.F.

39. On March 31, 2021, I telephonically interviewed J.F. who told me that he or she has never filed for UI benefits in California. J.F. stated that he or she lives in Illinois and has no

work history in California. J.F. also told me that he or she was not familiar with the 75th Avenue Apartment and has never worked as an administrative accountant. Furthermore, J.F. stated that he or she did not authorize anyone to file a UI claim in her name.

UI Claim Filed in the Name of Identity-Theft Victim K.K.

40. According to EDD records, on or about June 25, 2020, a UI claim was filed with EDD in the name of K.K. The claim listed the mailing address as the 75th Avenue Apartment and further stated that the claimant was laid off from his/her job as a “Dance Therapist” due to COVID-19. This claim was filed by an electronic device using IP Address 92.119.177.87, a masked, untraceable IP address. EDD approved the claim and began paying UI benefits on or around June 26, 2020, which required an interstate wire from California in or about June 2020 to fund the BofA-EDD debit card.

41. On or about June 26, 2020, BofA mailed a BofA-EDD debit card ending in 2312 to the 75th Avenue Apartment. On or about June 29, 2020, EDD issued an ID Alert process and mailed the corresponding forms to the mailing address on file.

42. According to BofA records, on or around July 15, 2020, as shown below, a Hyundai sedan arrived at a BofA drive-through ATM located at 10200 Lake Arbor Way, Mitchellville, Maryland. While the license plate of this Hyundai was not confirmed, it appears to be the same model and color as the vehicle registered to SANGODE. The driver of the vehicle resembles BAKARE based on a comparison using his 2020 booking photo. BofA records also show that BAKARE conducted a \$1,000 cash withdrawal using the BofA-EDD card in the name of K.K.

[CONTINUED ON NEXT PAGE]



FIGURE 6: BANK OF AMERICA RECORDS SHOWING ATM SURVEILLANCE PHOTO AT 10200 Lake Arbor Way, Mitchellville, MD, ON JULY 15, 2020

43. According to BofA records, on or about July 19, 2020, as shown below, an individual appearing to be ADEYINKA based on a comparison with his driver's license photo withdrew \$1,000 cash using BofA-EDD debit card ending in 2312 in the name of K.K. at the Landover Hills Bank of America ATM located at 7515 Annapolis Road, Hyattsville, Maryland.



FIGURE 7: BANK OF AMERICA RECORDS SHOWING ATM SURVEILLANCE PHOTOS AT 7515 Annapolis Road, Hyattsville, Maryland, ON JULY 19, 2020

44. EDD paid approximately \$14,550 in UI benefits for K.K. Approximately \$14,500 was withdrawn in cash from ATMs. On or around August 14, 2020, EDD disqualified the claim

due to a lack of response from the claimant on the ID Alert. On or around August 28, 2020, EDD claim notes indicated that mail was returned as “not deliverable.”

UI Claim Filed in the Name of Identity-Theft Victim M.O.

45. According to EDD records, on or about June 24, 2020, a UI claim was filed with EDD in the name of M.O. The claimant’s mailing address was listed as the 75th Avenue Apartment. The claim stated that M.O. lost his/her job as a “Computer Consultant” due to COVID-19. This claim was also filed using a masked, untraceable IP address. On or around June 25, 2020, EDD approved the claim and began paying UI benefits on the claim, which required an interstate wire from California in or about June 2020 to fund the BofA-EDD debit card.

46. On or around June 25, 2020, BofA mailed a BofA-EDD debit card ending in 4431 to the 75th Avenue Apartment. On June 29, 2020, EDD issued an ID Alert process and mailed the corresponding forms to the mailing address on file.

47. According to BofA records, on or around July 9, 2020, as shown below, a vehicle with what appears to be a Hyundai logo on the steering wheel arrived at a BofA drive-through ATM located at 10200 Lake Arbor Way, Mitchellville, Maryland. While the license plate of this Hyundai was not confirmed, it appears to be the same model and color as the vehicle registered to SANGODE. At that time, an individual appearing to be SANGODE made a \$1,000 cash withdrawal.

[CONTINUED ON NEXT PAGE]



FIGURE 8: BANK OF AMERICA RECORDS SHOWING ATM SURVEILLANCE PHOTOS AT 10200 Lake Arbor Way, Mitchellville, MD, ON JULY 9, 2020

48. On or around August 15, 2020, because the claimant failed to respond to the ID Alert, EDD disqualified this claim. EDD paid approximately \$14,550 to the BofA-EDD debit card in the name of M.O. From approximately June 30 to July 18, 2020, approximately \$14,500 was withdrawn from this card, and a vast majority of which was through ATM cash withdrawals.

UI Claim Filed in the Name of Identity-Theft Victim M.P.

49. According to EDD records, on or about June 24, 2020, a UI claim was filed with the EDD in the name of M.P., once again through a masked, untraceable IP address. The claimant's mailing address was listed as the 75th Avenue Apartment. The UI claim alleged that this person lost his/her job as an "Assistant Librarian" due to COVID-19. On or about June 25, 2020, EDD approved the claim and began paying UI benefits on the claim.

50. On or about June 25, 2020, BofA mailed a BofA-EDD debit card ending in 7706 to the 75th Avenue Apartment.

51. According to BofA records, on or about July 1, 2020, as shown below, a male resembling ADEYINKA based on a comparison with his driver's license photo arrived at a BofA ATM at Landover Hills located at 7515 Annapolis Rd, Hyattsville, Maryland, where he was surveilled withdrawing \$1,000 in cash using the 7706 debit card.



FIGURE 9: BANK OF AMERICA RECORDS SHOWING ATM SURVEILLANCE PHOTOS AT 7515 Annapolis Rd, Hyattsville, MD, ON JULY 1, 2020

52. On June 29, 2020, EDD issued an ID Alert process on this claim and disqualified it on August 14, 2020, due to no response from the claimant. On or around August 28, 2020, EDD mail addressed to M.P. at the 75th Avenue Apartment was returned as “not deliverable.”

53. EDD paid approximately \$13,500 onto the BofA-EDD debit card in the name of M.P. Throughout this time, BofA repeatedly sent one-time passwords to phone number 702-825-4032 concerning use of the BofA-EDD debit card. Federal agents learned that this was a voice over internet protocol (VoIP) number. From approximately June 30 to August 23, 2020, these EDD UI funds were depleted from 12 ATM withdrawals totaling approximately \$5,000 and more than 50 purchases of goods or services totaling approximately \$8,400. The goods and services include more than \$2,000 transferred through approximately three Cash App⁶ customers.

UI Claim Filed in the Name of Identity-Theft Victim T.Q.

54. According to EDD records, on or around June 25, 2020, a UI claim was filed with EDD in the name of T.Q. through a masked, untraceable IP address. The claimant’s address was listed as the 75th Avenue Apartment. The claim stated that the claimant lost his/her employment

⁶ Cash App is a peer-to-peer money transfer service and mobile device application developed by Square Inc. that allows users to send and receive money. Cash App also functions similarly to a bank account, giving users a debit card — called a “Cash Card” — that allows them to make purchases using the funds in their Cash App account.

as a “Customer Service Rep” due to COVID-19. On or about June 26, 2020, EDD approved the claim and began paying benefits on the claim.

55. On or about June 26, 2020, BofA mailed a BofA-EDD debit card ending 1706 containing UI benefits to the Toledo Terrace Apartment.

56. As shown below, on or around July 11, 2020, an individual appearing to be SANGODE based on his driver’s license photo withdrew \$1,000 cash using the 1706 BofA-EDD debit card at a BofA ATM located at 10200 Lake Arbor Way, Mitchellville, Maryland.



FIGURE 10: BANK OF AMERICA RECORDS SHOWING ATM SURVEILLANCE PHOTOS AT 10200 Lake Arbor Way, Mitchellville, MD, ON JULY 11, 2020

57. EDD paid approximately \$13,500 in UI benefits to the BofA-EDD debit card ending in 1706 in the name of T.Q. Between July 3 and July 19, 2020, all these funds were depleted via ATM cash withdrawals.

UI Claim Filed in the Name of Identity-Theft Victim V.S.

58. In or about June 2020, a UI claim was filed with EDD in the name of V.S. The claimant’s address was listed as the 75th Avenue Apartment. The claim stated that the claimant lost his/her employment as a “Cylinder Honer” due to COVID-19. On or about June 23, 2020, EDD approved the claim and began paying benefits on the claim.

59. On or about June 23, 2020, BofA mailed a BofA-EDD debit card ending 7990 containing UI benefits to the 75th Avenue Apartment.

60. According to BofA records, on or around July 5, 2020, as shown below, an individual appearing to be BAKARE based on his driver's license photo withdrew cash using the 7990 BofA-EDD debit card at a BofA ATM located at 10200 Lake Arbor Way, Mitchellville, MD.



FIGURE 11: BANK OF AMERICA RECORDS SHOWING ATM SURVEILLANCE PHOTOS AT 10200 Lake Arbor Way, Mitchellville, MD, ON JULY 5, 2020

61. EDD paid approximately \$10,200 in UI benefits to the BofA-EDD debit card ending in 7990 in the name of V.S. All these funds were depleted via ATM cash withdrawals.

Fraudulent UI Claims linked to the Toledo Terrace Apartment

62. In or about September 2020, in an effort to reduce fraud, the EDD increased scrutiny of UI claims filed using the same mailing address. Since this measure was put into place by the EDD, federal agents have noticed a reduction in the number of suspicious claims that get paid by the EDD. As it relates to this investigation, federal agents have not identified any further suspicious EDD claims linked to the 75th Avenue Apartment since approximately September 2020. With this new information, federal agents inquired to see if this UI fraud

scheme was still ongoing, and if so whether the SUBJECTS were using a different address or defrauding another state UI system.

63. In February 2021, with the assistance of software available to the DOL-OIG, I discovered that ADEYINKA's registered vehicle was photographed in close proximity to the Toledo Terrace Apartment complex. ADEYINKA's registered vehicle has also been photographed in close proximity to the Toledo Terrace Apartment complex on April 12, April 22, 2021 and May 7, 2021. To conduct further research on this address, I conducted a public records search and learned that that ADEYINKA has unspecified utilities registered to him at the Toledo Terrace Apartment.

64. I contacted the Maryland Department of Labor to see if the Toledo Terrace Apartment was being used in any Maryland UI claim filings. Based on Maryland UI claim data, federal agents learned that, beginning in February 2020, UI claims related to the pandemic began being filed using the Toledo Terrace Apartment address.⁷ For example, Maryland DOL data showed that approximately 53 individual Social Security numbers were used to file UI claims with the state of Maryland, all using the Toledo Terrace Apartment as the claimant's mailing address. The last known claim to be filed with Maryland using the Toledo Terrace Apartment address was on March 21, 2021.

65. Based on BofA records, which until April 2021 administered the State of Maryland's UI payments through BofA debit cards, the Toledo Terrace Apartment had 57 BofA UI user profiles set up using this address. These user profiles were set up using variations of the same email addresses. For example, 15 of these UI user profiles use KeithBarnes####@outlook.com. (For example: KeithBarnes.555, KeithBarnes112, KeithBarnes113, KeithBarnes114, etc). Another 23 UI profiles use a variation of YoungJO2290@gmail.com. (YOUN.G.J.O.2.2.90, YOUN.GJ.O229.0, etc.). Based on my training and experience, I know that this practice is informally known as "Gmail dotting," which

⁷ The investigation does not yet know how or why suspicious claims were filed using the Toledo Terrace Apartment before ADEYINKA was confirmed to be leasing the apartment.

is when fraudsters use the same Gmail address, but with a variation of the name by placing dot in various parts of the address. Because Gmail does not recognize the dot in an email address, incoming emails are all directed to the same address.

66. BofA records also show that these Maryland UI profiles were opened, and BofA debit cards were subsequently mailed to the Toledo Terrace Apartment, between June 2020 and January 2021. In this timeframe, Maryland paid approximately \$120,000 in UI benefits to these debit cards.

67. According to an Internet search, the Toledo Terrace Apartment is in the Lync at Alterra apartment complex, which advertises apartments units with up to three bedrooms. As stated above, Lync at Alterra confirmed to federal agents that ADEYINKA currently leases the Toledo Terrace Apartment. The lease agreement began on November 19, 2020 and ends on November 18, 2021.

68. According to Maryland DOL, the claims filed using the Toledo Terrace Apartment address are more recent than the California EDD UI claims. For example, the most recent known suspicious UI claim using the Toledo Terrace Apartment was filed on or around March 21, 2021, using the email address TonyTorrez1451@gmail.com, another email address known to be used for Gmail dotting.

69. According to BofA records, on or about December 25, 2020, a BofA-Maryland debit card in the name of T.S. and ending in 3215, which was mailed to the Toledo Terrace Apartment, was used for a \$2,177 transaction at “RPS*Lync at Alterra,” which is the Toledo Terrace Apartment complex.

70. Based on the above facts, federal agents believe that at least ADEYINKA and SANGODE currently reside at the Toledo Terrace Apartment. For example, in May 2021, SANGODE changed his vehicle’s registration address to the Toledo Terrace Apartment. Additionally, as recently as June 16, 2021, FBI surveillance observed ADEYINKA’s registered vehicle exiting the parking garage of the Toledo Terrace Apartment.

71. I am also aware that individuals involved in aggravated identity theft, UI fraud, and conspiracy to commit such offenses (including schemes to acquire and to use federally insured bank credit cards assigned to others), obtain access devices, PIN numbers, financial information, identity information, checks and other personal and financial information of victims via fraud and theft. I am also aware that in UI fraud and identity theft schemes, perpetrators will keep tools, implements, financial statements, access devices, and stolen items close to themselves (especially in vehicles they use, or their person, in their residences, in the residences of extended family members, and in storage units) or in areas to which they have access in order to ensure custody and control of the items and for easy access for use or disposal.

CONCLUSION

72. For the reasons stated above, there is probable cause to believe that the SUBJECTS and individuals known and unknown to this investigation acted in violation of at least 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud).

[CONTINUED ON NEXT PAGE]

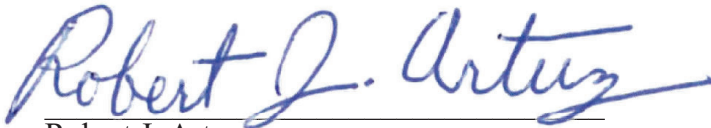
REQUEST TO SEAL

73. This case is the product of a covert investigation. Based on my training and experience in investigations such as this one, I believe that public disclosure of the existence of this affidavit, complaint, arrest warrants and/or search warrants may have a significant and negative impact on the continuing investigation and may severely jeopardize law enforcement efforts to execute the warrants. Also, premature disclosure may pose a risk to executing law enforcement. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this affidavit, the accompanying search warrant, and application.

/s/

John C. Collins
Special Agent
U.S. Department of Labor

Approved as to form.



Robert J. Artuz
Special Assistant United States Attorney

Subscribed and sworn to before me telephonically on this 12th day of July, 2021.



THE HONORABLE CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE