

ATTACHMENT A

On or about December 17, 2007, in the District of New Jersey and elsewhere, defendant

HAKEEM OLOKODANA

a/k/a "Shola Bello," and

a/k/a "Shawn Anderson"

did knowingly and with intent to defraud devise a scheme and artifice to defraud Affinity Federal Credit Union and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing this scheme and artifice to defraud, transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, and sounds.

In violation of Title 18, United States Code, Section 1343 and Section 2.

ATTACHMENT B

I, Scott Marino, a Special Agent of the Federal Bureau of Investigation, have knowledge of the following facts based upon my investigation and discussions with witnesses and other law enforcement agents. Since this affidavit is submitted for the purpose of establishing probable cause to support the issuance of a complaint and arrest warrant, I have not included each and every fact known by the government concerning this investigation.

1. At all times relevant to this Complaint:
 - a. Affinity Federal Credit Union (“AFCU”) was a credit union located in Somerset County, New Jersey and provided banking and loan services.
 - b. Kallback was a call forwarding service permitting subscribers to register for telephone numbers and forwarding those telephone numbers to predetermined numbers (“Ring-To Numbers”).

The G.K. Wire Transfer

2. On or about December 17, 2007, AFCU received a telephone call (the “December 17, 2007 Originating Call”) purportedly by an Affinity home equity line of credit (“HELOC”) account holder identified as “G.K.” (the “G.K. HELOC Account”).
3. At the time of the December 17, 2007 Originating Call, G.K. had access to a HELOC account with an original available balance of approximately \$810,000.
4. During the December 17, 2007 Originating Call, the person identifying himself as G.K. requested a \$675,600 wire transfer from the G.K. HELOC Account to an account at the Bank of Tokyo in the name of “Mosdaff Investments.”
5. Following the December 17, 2007 Originating Call, pursuant to AFCU policy, an AFCU representative called the home telephone number affiliated with the G.K. HELOC Account in an attempt to verify the wire request (the “December 17, 2007 Confirmation Call”). During this later call, an individual purporting to be G.K. confirmed the wire request to the “Mosdaff Investments” account.
6. On or about December 17, 2007, pursuant to the wire transfer request made by the person purporting to be G.K., AFCU executed a wire transfer out of the G.K. account in New Jersey to the an account in the name of “Mosdaff Investments” at Bank of Tokyo Mitsubishi, New York. Subsequently, the money in the “Mosdaff Investments” account was transferred to Bank of Tokyo Mitsubishi, Japan.
7. In or about December 2007, the FBI interviewed G.K., who confirmed that he/she

did not authorize a wire transfer from the G.K. HELOC Account.

The Actual G.K. Caller

8. On or about December 17, 2007, and sometime prior to the December 17, 2007 Confirmation Call, an individual purporting to be G.K. contacted Verizon complaining of a telephone line malfunction on his home telephone number. Verizon is the local telephone company administering G.K.'s home telephone. The caller persuaded Verizon to forward all incoming calls to G.K.'s home telephone number to the telephone number (646) 200-5790 until a repair crew could be dispatched to resolve the problem.

9. In or about December 2007, the telephone number (646) 200-5790 was assigned to an account in the name of "Shawn Anderson" at Kallback (the "Shawn Anderson Kallback Account"). As part of Kallback's call forwarding service, incoming calls to the (646) 200-5790 number were forwarded to a cellular telephone with the telephone number (480) 543-9837.

10. Investigation has revealed that Kallback accounts affiliated with defendant Hakeem Olokodana have been called by the cellular telephone with the telephone number (480) 543-9837.

11. Unbeknownst to the AFCU representative making the December 17, 2007 Confirmation Call, he/she was redirected to the (646) 200-5790 Kallback number and never reached G.K.

Defendant Hakeem Olokodana & the Shawn Anderson Kallback Account

12. The registrant to the Shawn Anderson Kallback Account provided the e-mail address kuhndert527@yahoo.com.

13. Search results from the kuhndert527@yahoo.com account reveal that on or about April 25, 2008 the account contained copies of wire authorization requests from banks and credit unions around the United States; personal information for numerous individuals; and bank and credit union account information for numerous individuals. The information was consistent with a scheme to commit identity theft and the fraudulent transfer of funds out of line of credit accounts.

14. Investigation has revealed that the Shawn Anderson Kallback Account and the kuhndert527@yahoo.com account were accessed through a computer assigned a specific IP address by Sprint PCS.

15. Records received from Sprint PCS indicate that, at the time the Shawn Anderson Kallback Account was created, the IP address was assigned to a wireless access card registered to Shola Bello of Queens, New York (the "Shola Bello Aircard"). Through intercepted

communications and pen register information, the FBI has identified that the user of the Shola Bello Aircard as defendant Hakeem Olokodana.

16. Records received from Sprint PCS indicate that the Shola Bello Aircard was also used to log into the kuhndert527@yahoo.com account.

17. The Sprint account with which the Shola Bello Aircard is affiliated, also has a Sprint cellular phone associated with it in the name of Shola Bello (the "Shola Bello Phone").

18. Between on or about December 17, 2007 and June 6, 2008, the phone numbers associated with the Shola Bello Aircard and Shola Bello Phone were unchanged.

19. Between on or about May 8, 2008 and June 6, 2008, the FBI conducted court-authorized interception of telephonic communications occurring over the Shola Bello Phone. During conversations on the Shola Bello Phone, the user was routinely addressed as "Hakeem." Through surveillance and monitoring of the Shola Bello Phone location information, the FBI has identified the user of the Shola Bello Phone as defendant Hakeem Olokodana. For example, on or about May 23, 2008 defendant Hakeem Olokodana traveled to a wedding in Atlanta, Georgia. He departed from Laguardia Airport in New York. The airline ticket and hotel reservation in Atlanta were under his name. The Shola Bello Phone location information is consistent with a trip from Laguardia Airport to Atlanta, Georgia on or about the dates and times of defendant Hakeem Olokodana's trip.

20. Through intercepted communications, the FBI has learned that defendant Hakeem Olokodana used the Shola Bello Phone to discuss stolen identities and fraudulent transfer of funds from line of credit accounts, consistent with the fraud discussed above.

21. The following descriptions of intercepted calls discussed are based on summaries of the conversations.

- a. On or about May 8, 2008, at approximately 2:53 p.m., defendant Hakeem Olokodana placed an outgoing call to a calling card which he used to initiate a number of calls to banks in which he used an automated voice response system to check line of credit and available balances on several loan accounts. In each case, defendant Hakeem Olokodana entered different account numbers and/or Social Security numbers.
- b. On or about May 14, 2008, at 1:49 p.m., defendant Hakeem Olokodana received a telephone call in which he told the unidentified caller that he had just gotten off of the phone with Bank of America. Defendant Hakeem Olokodana indicated that during the conversation, he obtained log-in information for a Bank of America customer. The caller stated to defendant Hakeem Olokodana that most Bank of America accounts with a line of credit will also have checking accounts. The

caller offered suggestions to defendant Hakeem Olokodana about different ways of manipulating account information in furtherance of the fraud, such as: (1) moving funds from a HELOC into a checking account; (2) creating a checking account to receive funds transferred from a HELOC; (3) printing checks drawn on customer checking accounts. Both defendant Hakeem Olokodana and the caller agreed that most bank customers do not check their monthly statements. Defendant Hakeem Olokodana asked the caller about a Washington Mutual card. The caller indicated he had a log-in for that Washington Mutual account, and that the account had \$45,000 in it. The caller further indicated he was trying to do "Citi" and that a man named "Raimi" "does State Farm."