


SEALED

COPY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
MAY 19 2015
CLERK, U.S. DISTRICT COURT
By 

UNITED STATES OF AMERICA

v.

SEGUN EDMWONYI (1)
aka "Benny O. Prince"
LATONYA LANETTE CARSON (2)
RICARDO GARTH SOLOMON (3)
SMITH OLSOLA AKIN (4)

FILED UNDER SEAL

3-15CR-0211M

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Money Launder
(Violation of 18 U.S.C. § 1956(h))

1. Beginning by at least 2010, the exact dated being unknown to the Grand Jury, and continuing through the return of this Indictment, in the Northern District of Texas, and elsewhere, defendants, **Segun Edomwonyi, aka "Benny O. Prince", Latonya Lanette Carson, Ricardo Garth Solomon, and Smith Olsola Akin**, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Theft of Public Funds, in violation of Title 18 United State Code, Section 641, and Access Device

Fraud, in violation of Title 18, United States Code, Section 1029, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

Manner and Means of the Conspiracy

2. In furtherance of the conspiracy the defendants and one or more of their coconspirators would and did:
 - a. obtain stolen names and other personal identifiers of individuals in order to create fraudulent U.S. Individual income tax returns in the name of the identity victims that claimed fraudulent refunds based on false and fictitious financial information;
 - b. electronically file the false and fraudulent U.S. Individual tax returns with the Internal Revenue Service directing that the refunds be deposited on a reloadable debit card that had been previously purchased and registered online in the name of the identity victim;
 - c. use the debit cards funded by the fraudulent income tax refund to obtain cash and to purchase money orders;
 - d. establish bank accounts in name of businesses that purportedly operated as used car business at financial institutions that were engaged in activities affecting interstate commerce;

e. conduct financial transactions at the financial institutions by depositing into the bank accounts money orders that were purchased by the debit cards holding fraudulent tax refunds;

f. conduct financial transactions at financial institutions by writing checks and purchasing cashier's checks from the business accounts for the purpose of acquiring used cars at wholesale dealer auctions, and

g. export the purchased vehicles to Nigeria.

It was further a part of the manner and means of the conspiracy that:

h. On or about May 16, 2011, defendant **Segun Edomwonyi** established a bank account numbered xxxx4218 at JP Morgan Chase in the name of Stone Tek Auto Recycling. From February of 2013 through November of 2013, approximately 618 Western Union and Money Gram money orders that had been purchased in part with the proceeds from fraudulently filed income tax returns were deposited into the account;

i. On or about March 12, 2012, defendant **Segun Edomwonyi**, using the alias "Benny O. Prince" established a bank account numbered xxxx0373 at JP Morgan Chase in the name of Benny O. Prince dba BP Auto Remarketer & Financial. From April of 2012 to December of 2012 approximately 476 Western Union money orders and 402 Money Gram money orders that had been purchased in part with the proceeds from fraudulently filed income tax returns were deposited into the account;

j. On or about August 21, 2013, defendant **Latonya Lanette Carson** established a bank account numbered xxxx1464 at Citibank in the name of Exquisite Carz of Dallas. From April of 2013 to June of 2014 approximately 310 Western Union money and

Money Gram money orders that had been purchased in part with the proceeds from fraudulently filed income tax returns were deposited into the account;

k. On or about March 25, 2010, defendant **Smith Olsola Akin** established a bank account number xxxx8994 at JP Morgan Chase in the name of Smith Akin dba EKO Financial. From July of 2013 to May of 2014 approximately 138 Western Union money and Money Gram money orders that had been purchased in part with the proceeds from fraudulently filed income tax returns were deposited into the account;

l. On or about September 10, 2010, defendant **Ricardo Garth Solomon** established a bank account number xxxx0932 at Wells Fargo Bank in the name of Ricardo Solomon dba Rico's Auto Inc. From May of 2012 to July of 2014 checks and transfers from BP Auto Remarketer & Financial account number xxxx0373 in the amount of \$163,270 funded by fraudulently filed income tax returns were deposited into the account;

m. Between in or about May of 2012 and May of 2014, the defendants and their conspirators paid over \$1,184,950 from the accounts identified above to purchase used cars from wholesale dealer auctions located in Dallas County;

n. Between in or about January of 2012 and January of 2015, the defendants and their conspirators exported approximately 204 used cars to Nigeria.

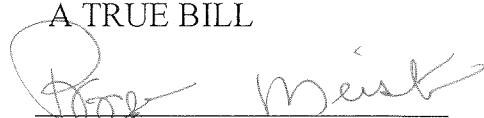
In violation of Title 18, U.S.C § 1956(h) (18 U.S.C. § 1956(a)(1)(B)(i)).

Notice of Forfeiture
(18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461(c))


Upon conviction for any of the offenses alleged in Count One of this Indictment, defendants **Segun Edomwonyi, aka “Benny O. Prince”, Ricardo Garth Solomon, Latonya Lanette Carson, and Smith Olsola Akin** shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the respective offense, whether directly or indirectly, including the total proceeds derived from the offense (commonly referred to as a “money judgment”).

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), if any of the above property subject to forfeiture, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States of America to seek forfeiture of any other property of the defendant up to the value of the above described property subject to forfeiture.

A TRUE BILL


FOREPERSON

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