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**SUPERIOR COURT
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ583-09-14

Superior Court
Docket Number 09-12-00349-S

STATE OF NEW JERSEY)

v.)

JOHNSON COKER)
also known as

JOHNNY TUNDE)
also known as

ADEYEMISI TOYUSINI)

ADEBOWALE SHEBA)

also know as)
ADEBAYO A. MICHAEL)

TAIWO D. DAISI)

and)

UGOCHUKWU H. MADUBUIKE)

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

JOHNSON COKER

ADEBOWALE SHEBA

TAIWO D. DAISI

and

UGOCHUKWU H. MADUBUIKE

and other persons whose identities are known to the grand jurors

and who are coconspirators, but not named as defendants herein, between on or about February 22, 2005, and on or about March 11, 2008, at the City of Newark, in the County of Essex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Money Laundering and Receiving Stolen Property, did conspire, and agree that:

A. One or more of them would engage in the conduct which would constitute the aforesaid crimes, or an attempt or solicitation to commit such crimes; or

B. One or more of them would aid in the planning, attempt, solicitation, or commission of the aforesaid crimes, that is:

1. Money Laundering, in that one or more of them would engage in transactions involving property, in an aggregate amount of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to N.J.S.A. 2C:21-25b(2) (a).

2. Receiving Stolen Property, in that one or more of them would knowingly receive or bring into this State movable property of another in excess of \$75,000, knowing that it has been stolen, or believing that it is probably stolen, contrary to

the provisions of N.J.S.A. 2C:20-7.

All in violation of the provisions of N.J.S.A. 2C:5-2,
and against the peace of this State, the government and dignity
of the same.

COUNT TWO

(Money Laundering - Second Degree)

JOHNSON COKER

TAIWO D. DAISI

and

UGOCHUKWU H. MADUBUIKE

between on or about February 22, 2005, and on or about March 11, 2008, at the City of Newark, in the County of Essex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did engage in transactions involving property in an aggregate amount in excess of \$75,000, known or which a reasonable person would believe to be derived from criminal activity, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is the said JOHNSON COKER, TAIWO D. DAISI and UGOCHUKWU H. MADUBUIKE did engage in the transactions of cashing or depositing New Jersey Gross Income Tax Refund Checks through bank accounts they maintained, said checks made payable to various taxpayers, involving an aggregate amount of \$435,577.42, known to be derived from criminal activity, knowing that the transactions were designed in whole or in part to conceal the location, ownership and control of the property which they knew to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(2)(a), and against the peace of

this State, the government and dignity of the same.

COUNT THREE

(Receiving Stolen Property - Second Degree)

JOHNSON COKER

TAIWO D. DAISI

and

UGOCHUKWU H. MADUBUIKE

between on or about February 22, 2005, and on or about March 11, 2008, at the City of Newark, in the County of Essex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another in excess of \$75,000; knowing that it has been stolen, or believing that it is probably stolen, that is, the said JOHNSON COKER, TAIWO D. DAISI, and UGOCHUKWU H. MADUBUIKE, did knowingly receive or bring into this state, New Jersey Gross Income Tax Refund Checks, in an aggregate amount of \$435,577.42, knowing said checks had been stolen, or believing that they were probably stolen from the New Jersey Department of the Treasury, Division of Taxation, contrary to the provisions of N.J.S.A. 2C:20-7, N.J.S.A. 2C:2-6, and N.J.S.A. 2C:20-2b(1)(a), and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Use of Personal Identifying Information
of Another - Second Degree)

JOHNSON COKER

on or about April 5, 2005, at the City of Rahway, in the County of Union, elsewhere and within the jurisdiction of this Court, in obtaining or attempting to obtain a New Jersey digital Driver's License or other document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, did knowingly, exhibit, display or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, the said JOHNSON COKER, in obtaining a New Jersey digital Driver's License in the name Johnny Tunde issued by the New Jersey Motor Vehicle Commission, which could be used as a means of verifying a person's identity, age or any other personal identifying information, did knowingly exhibit, display or utter a social security card in the name of Johnny Tunde, contrary to the provisions of N.J.S.A. 2C:21-17.2, against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Theft by Deception - Second Degree)

JOHNSON COKER

between on or about February 1, 2008, and on or about April 23, 2008, at the Township of Woodbridge and at the Township of Old Bridge, both in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely did obtain by deception property of another, valued in excess of \$75,000; that is, the said JOHNSON COKER did purposely obtain by deception a mortgage in the amount of \$417,000 by submitting or causing to be submitted earning statements and Form W-2s, thereby creating or reinforcing false impressions to the mortgage lender regarding his employment status with "OSAAAA Enterprises, Inc.," and his earnings from said company as the Director of Operations;

WHEREAS IN TRUTH AND IN FACT, as the said JOHNSON COKER then and there well knew, he did not work for or receive earnings from OSAAAA Enterprises, Inc. as reported, all contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:20-2b(1)(a) against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft by Deception - Second Degree)

ADEBOWALE SHEBA

between on or about May 15, 2005, and on or about June 17, 2005, at the Township of Cranford, in the County of Union, elsewhere, and within the jurisdiction of this Court, purposely did obtain by deception property of another, valued in excess of \$75,000; that is, the said ADEBOWALE SHEBA did purposely obtain by deception two mortgages, in an aggregate amount of \$278,950, by submitting or causing to be submitted false earning statements and Form W-2s in support of his mortgage application, thereby creating or reinforcing the false impression to the mortgage lender that the information submitted was true;

WHEREAS IN TRUTH AND IN FACT, as the said ADEBOWALE SHEBA then and there well knew, the earnings statements and Form W-2s were false, all contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:20-2b(1)(a) against the peace of this State, the government and dignity of the same.

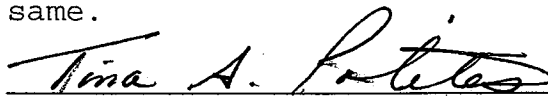
COUNT SEVEN

(Theft by Deception - Second Degree)

ADEBOWALE SHEBA

between on or about March 6, 2006, and on or about May 1, 2006, at the Township of Fairfield, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did obtain by deception property of another, valued in excess of \$75,000; that is, the said ADEBOWALE SHEBA did purposely obtain by deception two mortgages, in an aggregate amount of \$235,000, by submitting or causing to be submitted false earning statements and Form W-2s in support of his mortgage application, thereby creating or reinforcing the false impressions to the mortgage lender that the information submitted was true;

WHEREAS IN TRUTH AND IN FACT, as the said ADEBOWALE SHEBA then and there well knew, the earnings statements and Form W-2s were false, all contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:20-2b(1) (a) against the peace of this State, the government and dignity of the same.



Tina A. Polites, A.A.G.
Deputy Director
Division of Criminal Justice

A TRUE BILL:



Deputy, Foreperson

Dated: 12/23/2009.

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TAIWO D. DAISI)

and)


UGOCHUKWU H. MADUBUIKE)

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 23rd day of December, 2009, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.



Linda R. Feinberg, A.J.S.C.