

SEPTEMBER 16, 2022

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ778-22-5
Superior Court
Docket Number 22-9-120-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

TAIWO OLOSUNDE also known as)
PETER TAIWO OLOSUNDE,)

WINNIFRED OLOSUNDE, and)

TWO ENTERPRISE, INC.)

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

COUNT ONE

(Insurance Fraud - Third Degree)

Between on or about December 16, 2019, and on or about August
31, 2021, at the Township of Ewing, in the County of Mercer, and
elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE

did commit insurance fraud; that is, the said WINNIFRED OLOSUNDE
did knowingly make, or cause to be made false, fictitious,
fraudulent, or misleading statements of material fact in, or
knowingly did omit or cause to be omitted material facts from any

records, bills, claims, or other documents, in writing, electronically, orally, or in any other form, that the said WINNIFRED OLOSUNDE did attempt to submit, submitted, caused to be submitted, or did attempt to cause to be submitted as part of, in support of, or in connection with an application to obtain or renew an insurance policy, that the said WINNIFRED OLOSUNDE, for a company she owned, used, controlled or operated, Two Enterprise, Inc. (hereinafter "Two Enterprise"), submitted or caused to be submitted to New Jersey Manufacturers Insurance Group (hereinafter "NJM") and Amguard Insurance Company (hereinafter "Amguard)", as follows:

1. On or about December 16, 2019, the said WINNIFRED OLOSUNDE submitted or caused to be submitted to NJM payroll documents that contained a false, fictitious, fraudulent, or misleading statement of material fact , or omitted or caused to be omitted a material fact, regarding the payroll to or the number of non-emergency medical transportation drivers employed or subcontracted by Two Enterprise;
2. On or about March 30, 2020, the said WINNIFRED OLOSUNDE submitted or caused to be submitted to NJM payroll documents that contained a false, fictitious, fraudulent, or misleading statement of material fact , or omitted or caused to be omitted a material fact, regarding the payroll to or the number of non-emergency medical transportation drivers employed or subcontracted by Two Enterprise;
3. On or about August 30, 2021, the said WINNIFRED OLOSUNDE submitted or caused to be submitted to Amguard payroll records including 941 Quarterly Federal Tax Returns that contained a

false, fictitious, fraudulent, or misleading statement of material fact , or omitted or caused a material fact to be omitted, regarding the payroll to or the number of non-emergency medical transportation drivers employed or subcontracted by Two Enterprise;

4. On or about August 31, 2021, the said WINNIFRED OLOSUNDE submitted or caused to be submitted to Amguard an email containing a chart listing the duties of Two Enterprises' employees that contained a false, fictitious, fraudulent, or misleading statement of material fact , or omitted or caused a material fact to be omitted, regarding the duties of non-emergency medical transportation drivers employed or subcontracted by Two Enterprise,

contrary to the provisions of N.J.S.A. 2C:21-4.6a, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Insurance Fraud -Third Degree)

On or about December 16, 2019 at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

TAIWO OLOSUNDE

did commit insurance fraud; that is, the said TAIWO OLOSUNDE did knowingly make, or cause to be made false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly did omit or cause to be omitted material facts from any records, bills, claims, or other documents, in writing, electronically, orally, or in any other form, that the said TAIWO OLOSUNDE did attempt to submit, submitted, caused to be submitted, or did attempt to cause to be submitted as part of, in support of, or in connection with an application to obtain or renew an insurance policy, that the said TAIWO OLOSUNDE, for a company he owned, used, controlled or operated, Two Enterprise, Inc. (hereinafter "Two Enterprise"), submitted or caused to be submitted to New Jersey Manufacturers Insurance Group (hereinafter "NJM") as follows:

1. On or about December 16, 2019, the said TAIWO OLOSUNDE submitted or caused to be submitted to NJM payroll documents that contained a false, fictitious, fraudulent, or misleading statement of material fact , or omitted or caused to be omitted a material fact, regarding the payroll to or the

number of non-emergency medical transportation drivers
employed or subcontracted by Two Enterprise;
contrary to the provisions of N.J.S.A. 2C:21-4.6a, and against the
peace of this State, the government and dignity of the same.

COUNT THREE

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about October 15, 2017, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did fail to file a return or report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE and TAIWO OLOSUNDE, a married couple, did fail to file a New Jersey Income Tax Return form NJ-1040, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2016 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT FOUR

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2018, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did fail to file a return or report required to be filed with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE and TAIWO OLOSUNDE, a married couple, did fail to file a New Jersey Income Tax Return NJ-1040, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2017 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT FIVE

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about October 15, 2019, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did fail to file a return or report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE and TAIWO OLOSUNDE, a married couple, did fail to file a New Jersey Income Tax Return NJ-1040, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2018 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT SIX

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2020, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did fail to file a return or report required to be filed with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE and TAIWO OLOSUNDE, a married couple, did fail to file a New Jersey Income Tax Return NJ-1040, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2019 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT SEVEN

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about October 15, 2021, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did fail to file a return or report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE and TAIWO OLOSUNDE, a married couple, did fail to file a New Jersey Income Tax Return NJ-1040, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2020 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT EIGHT

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about October 15, 2017, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid for the calendar year ending 2016, fail to pay and turn over gross income taxes due in the approximate amount of \$4,521.00,

contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT NINE

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2018, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid for the calendar year ending 2017, fail to pay and turn over gross income taxes due in the approximate amount of \$3,847.00,

contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT TEN

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about October 15, 2019, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid for the calendar year ending 2018, fail to pay and turn over gross income taxes due in the approximate amount of \$5,515.00,

contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT ELEVEN

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2020, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid for the calendar year ending 2019, fail to pay and turn over gross income taxes due in the approximate amount of \$8,275.00, contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT TWELVE

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about October 15, 2021, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE and

TAIWO OLOSUNDE

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid for the calendar year ending 2020, fail to pay and turn over gross income taxes due in the approximate amount of \$5,439.00,

contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT THIRTEEN

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2018, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and

TWO ENTERPRISE, INC.

did fail to file a return or report required to be filed with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and/or TWO ENTERPRISE INC., did fail to file an Employer Gross Income Tax Return, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey corporate income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2017 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT FOURTEEN

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2019, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and

TWO ENTERPRISE, INC.

did fail to file a return or report required to be filed with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and/or TWO ENTERPRISE INC., did fail to file an Employer Gross Income Tax Return, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey corporate income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2018 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT FIFTEEN

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2020, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and

TWO ENTERPRISE, INC.

did fail to file a return or report required to be filed with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and/or TWO ENTERPRISE INC., did fail to file an Employer Gross Income Tax Return, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey corporate income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2019 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT SIXTEEN

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2021, at the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and

TWO ENTERPRISE, INC.

did fail to file a return or report required to be filed with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due; that is, the said WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and/or TWO ENTERPRISE INC., did fail to file an Employer Gross Income Tax Return, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey corporate income taxes, penalty, or interest, or any part thereof, due for the tax year ending 2020 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8 and N.J.S.A. 2C:2-6 and against the peace of this State, the government, and dignity of the same.

COUNT SEVENTEEN

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2018, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and

TWO ENTERPRISE, INC.

did, after having collected or withheld taxes as required by state law, purposely fail to turn over the taxes to the Director of the Division of Taxation in the manner and at the time prescribed by law for the calendar year ending 2017, in the approximate amount of \$1,092.00,

contrary to the provisions of N.J.S.A. 54:52-15 and against the peace of this State, the government, and dignity of the same.

COUNT EIGHTEEN

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2019, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and

TWO ENTERPRISE, INC.

did, after having collected or withheld taxes as required by state law, purposely fail to turn over the taxes to the Director of the Division of Taxation in the manner and at the time prescribed by law for the calendar year ending 2018, in the approximate amount of \$1,569.00,

contrary to the provisions of N.J.S.A. 54:52-15 and against the peace of this State, the government, and dignity of the same.

COUNT NINETEEN

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2020, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and

TWO ENTERPRISE, INC.

did, after having collected or withheld taxes as required by state law, purposely fail to turn over the taxes to the Director of the Division of Taxation in the manner and at the time prescribed by law for the calendar year ending 2019, in the approximate amount of \$1,773.00,

contrary to the provisions of N.J.S.A. 54:52-15 and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2021, in the Township of Ewing, in the County of Mercer, and elsewhere, all within the jurisdiction of this Court,

WINNIFRED OLOSUNDE, TAIWO OLOSUNDE, and

TWO ENTERPRISE, INC.

did, after having collected or withheld taxes as required by state law, purposely fail to turn over the taxes to the Director of the Division of Taxation in the manner and at the time prescribed by law for the calendar year ending 2020, in the approximate amount of \$1,455.00,

contrary to the provisions of N.J.S.A. 54:52-15 and against the peace of this State, the government, and dignity of the same.



Tracy M. Thompson
Insurance Fraud Prosecutor
Division of Criminal Justice
Office of the Insurance Fraud Prosecutor

A TRUE BILL:

s/Lisa Dick
Foreperson
Dated: 9/16/22