

ATTACHMENT A
(Money Laundering Conspiracy)

From in or around January 2019 through the present, in the District of New Jersey and elsewhere, the defendant

SHANNON BRAXTON

did knowingly, combine, conspire, confederate, and agree with others to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved proceeds of specified unlawful activity, that is, wire fraud, 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, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code, Section 1956(h).

ATTACHMENT B

I, Jimena Noonan, am a Special Agent of the Federal Bureau of Investigation. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including business records, bank records, and other documents and records. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background:

1. During the time period relevant to this criminal complaint:
 - a. Shannon Braxton was a resident of Maryland.
 - b. Braxton maintained an account at a credit union ("Account-1") that she used to launder the proceeds of romance scams.
 - c. Braxton's sister maintained an account at the same credit union ("Account-2"), which she also used to launder the proceeds of romance scams.
 - d. Bank Account-3 was a business bank account located in Kearney, New Jersey.
 - e. Shannon Braxton maintained an account at another credit union ("Account-4"), as did her sister ("Account-5"), that they used to launder the proceeds of romance scams.
 - f. All wire transfers processed through the Fedwire Funds Service ("Fedwire") were processed in a way that caused an electronic communication to travel through a Federal Reserve facility in New Jersey.

Shannon Braxton's Money Laundering Scheme:

2. As set forth below, there is probable cause to believe that Braxton laundered the proceeds of internet-enabled romance scams through Account-1 and Account-2.
3. After receiving suspected romance scam victim money, Braxton withdrew a large portion of the fraud proceeds as cash.
4. While the investigation remains ongoing, law enforcement believes that Braxton has received approximately \$500,000 in fraudulent proceeds.

Victim-1:

5. Victim-1, a resident of Washington state, was a victim of a romance scam who, as a part of the scam, was directed to send money to Account-1.

6. In or around January 2021, Victim-1 received a pop-up notification on her phone from a man named "Dr. William Tiller." Victim-1 began talking with "Dr. William Tiller" by using several different online methods of communication and eventually believed that she was in a romantic relationship with him. Victim-1 sent thousands of dollars to various individuals at the direction of "Dr. William Tiller."

7. At the direction of "Dr. William Tiller," Victim-1 sent three wire transfers to Account-1: one on or about March 10, 2021, in the approximate amount of \$5,000, one on or about March 18, 2021, in the approximate amount of \$20,000, and another on or about March 23, 2021 in the approximate amount of \$10,350. All three wire transfers were executed through Fedwire. Shortly after receiving the money, Braxton withdrew the majority of the funds in cash.

Victim-2:

8. Victim-2, a resident of Massachusetts, was also the victim of a romance scam who, as part of the scam, was directed to send money to Account-5, some of which was then transferred to Account-4.

9. On or about December 5, 2018, Victim-2 met a man who was purportedly named "Gabriel Thotsten" on an online dating website. "Gabriel Thotsten" told Victim-2 that he was a doctor working in Syria. After a few weeks of communicating with Victim-2, "Gabriel Thotsten" asked Victim-2 to help him ship a package, and then over the following months, "Gabriel Thotsten" convinced Victim-2 to send money to pay for fees and other costs associated with shipping the package. More specifically, "Gabriel Thotsten" told Victim-2 that the package contained all of his valuables, which he did not want to travel with because doing so would be too risky.

10. As a part of the romance scam, "Gabriel Thotsten" directed Victim-2 to coordinate and speak with "Thomas Lawson" and "Thomas Sawyer." As a part of the scam, Victim-2 was sent various documents purportedly from government agencies, including Interpol and the Department of Homeland Security, to attempt to bolster the legitimacy of the fraud.

11. As a part of the romance scam, Victim-2 was directed to wire money to several different accounts, including Account-5. On or about January 30, 2019, Victim-2 sent through Fedwire a wire of approximately \$23,900 to Account-5.

12. On or about the same day, January 30, 2019, Braxton's sister transferred approximately \$9,000 to Account-4. Braxton withdrew approximately \$5,000 and \$2,000 from Account-4 on or about January 31, 2019 and February 1, 2019, respectively.

13. On or about March 1, 2019, the fake shipping company that Victim-2 was communicating with for “Gabriel Thotsten’s” benefit sent her the bank information for Account-5.

14. On or about March 6, 2019, Victim-2 sent another wire of approximately \$12,000 to Account-5 via Fedwire.

Victim-3:

15. Victim-3, a resident of Wisconsin, was also the victim of a romance scam who, as part of the scam, was directed to send money to Account-1.

16. In or around July 2019, someone purporting to be a woman contacted Victim-3 while he was using an online dating website for seniors. The woman told Victim-3 that the woman had a friend who was interested in Victim-3. Victim-3 began communicating with the friend, who claimed to be “Helen Nielsen.” Victim-3 believed that he and “Helen Nielsen” were in a romantic relationship. “Helen Nielsen” told Victim-3 that she was a flight stewardess who had just taken on a job in construction in South Africa. While purportedly in South Africa, “Helen Nielsen” experienced a variety of unforeseen unfortunate circumstances and asked Victim-3 to send her money for, among other things, hospital bills, hotel bills, taxes, and union dues. Victim-3 believes that he sent approximately \$500,000 for the benefit of “Helen Nielsen.”

17. As a part of the romance scam, on or about August 9, 2019, Victim-3 obtained a cashier’s check in the approximate amount of \$14,000 made payable to Braxton’s sister. The check was deposited into Account-2 and posted on or about August 12, 2019. Thereafter, Braxton’s sister made two cash withdrawals of approximately \$2,000 and \$7,500 on or about August 13, 2019 and August 19, 2019, respectively.

18. As a part of the romance scam, on or about October 17, 2019, Victim-3 obtained a cashier’s check in the approximate amount of \$80,000 made payable to Braxton’s sister. The check was deposited into Account-2. Following the deposit, Braxton’s sister made several cash withdrawals from the account, all in amounts under \$10,000.

19. As a part of the romance scam, Victim-3 was instructed to deposit funds into Bank Account-3. On or about September 30, 2020, Victim-3 obtained a cashier’s check for approximately \$72,500 to deposit into Bank Account-3. On or about October 20, 2020, Victim-3 obtained a cashier’s check in the approximate amount of \$21,000 to deposit into Bank Account-3.

20. As a part of the romance scam, and to further perpetuate the fraud, in or around November 2020, “Helen Nielsen” directed Victim-3 to a website that appeared to be a legitimate South African bank, but was actually a spoofed website of a legitimate South African bank. “Helen Nielsen” instructed Victim-3 to open up a bank account at the spoofed bank website to help facilitate the transfer of funds. As a result, Victim-3 provided the spoofed

website with copies of his passport, a photo of himself, and to create a username and password.

21. As a part of the romance scam, on or about July 2, 2021, Victim-3 sent through Fedwire a wire in the approximate amount of \$15,000 to Account-1.

22. On or about July 2, July 3, July 4, and July 5, 2021, Braxton withdrew cash from Account-1 using several different ATMs. On or about July 6, 2021, Braxton withdrew approximately \$8,500 in cash from Account-1. On or about July 7, 2021, Braxton withdrew approximately \$3,400 from Account-1. In other words, shortly after receiving Victim-3's money, Braxton withdrew nearly all of the deposit in cash.

23. As a part of the romance scam, on or about July 16, 2021, Victim-3 sent through Fedwire a wire in the approximate amount of \$7,800 to Account-1.

24. On or about the next day, Braxton withdrew approximately \$1,003 from Account-1 via ATM. On or about July 19, 2021, Braxton made a cash withdrawal of approximately \$6,500 and another ATM withdrawal of approximately \$303. In other words, shortly after receiving Victim-3's money, Braxton once again withdrew all of the deposited money in cash.