

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre
: :
v. : Mag. No. 25-13051
: :
RAENA FULLER : CRIMINAL COMPLAINT

I, Brian Johnson, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Special Agent Brian Johnson
Federal Bureau of Investigation

Special Agent Johnson attested to this
Complaint by telephone pursuant to FRCP
4.1(b)(2)(A).

Sworn to and subscribed via telephone,
this 11th day of February, 2025

NEW JERSEY
State

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE

Leda Dunn Wettre /BCJ
Signature of Judicial Officer

ATTACHMENT A

(Wire Fraud Conspiracy)

From in or around September 2021 through in or around December 2022, in Bergen County, in the District of New Jersey and elsewhere, defendant

RAENA FULLER

knowingly and intentionally conspired with others to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, to wit, a wire transmission sent on or about November 9, 2021, between a location outside of New Jersey and a location inside of New Jersey, contrary to Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1349.

ATTACHMENT B

I, Brian Johnson, a Special Agent with the Federal Bureau of Investigation (“FBI”), having personally participated in an investigation of the conduct of defendant RAENA FULLER (“RAENA”), and having spoken with other law enforcement officers and individuals and reviewed documents, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the actions, statements, and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Similarly, dates and times are approximations, and should be read as “on or about,” “in or about,” or “at or about” the date or time provided.

Background

1. At various times relevant to this Complaint:
 - a. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or around March 2020 that was designed to provide emergency financial assistance to Americans suffering the economic effects of the COVID-19 pandemic. The CARES Act enabled the Small Business Association (“SBA”) to offer funding through the Economic Injury Disaster Loan (“EIDL”) program to business owners negatively affected by the COVID-19 pandemic. The EIDL program provided low-interest financing and grants to small businesses, renters, and homeowners in regions affected by declared disasters, like the COVID-19 pandemic.
 - b. To obtain an EIDL, a qualifying business applied to the SBA and provided certain information about its operations through an online portal. The EIDL approval process required applicants to supply minimal eligibility documentation and to affirm that the information in the application was true and correct under the penalty of perjury and applicable criminal statutes. The amount of an EIDL was based, in part, on the information provided by the applicant—primarily, gross revenue minus cost of goods sold, divided by two.
 - c. Business-1 was located in Louisiana.

The Fraudulent EIDL

2. In or around September 2021, an application (the “Application”) was made to the SBA for an EIDL on behalf of Business-1.

3. In or around November 2021, the SBA began funding the EIDL in response to the Application.

4. In total, the SBA provided approximately \$1,200,000 in response to the Application to a bank account ending in 3630 in the name of Business-1 held at Bank-1 (“Account-1”). For instance, on or about November 9, 2021, the SBA transferred approximately \$500,000 into Account-1 in response to the Application. This transfer caused a wire transfer to occur between a location in Bergen County, New Jersey and a location outside of New Jersey.

5. Records obtained during the investigation reveal that approximately \$800,000 of the approximate \$1,200,000 issued by the SBA in response to the Application was subsequently transferred or deposited into a bank account ending in 5884 held at Bank-2 (“Account-2”).

6. Records obtained during the investigation further reveal that: (a) Account-2 funded approximately seven cashier’s checks with an aggregate value of approximately \$400,000 (the “Cashier’s Checks”); (b) the Cashier’s Checks were all made payable to an entity named T.K. Fuller Enterprises Inc.; and (c) the Cashier’s Checks were deposited into two Bank-2 accounts ending in 4435 and 4448, respectively, each held in the name of T.K. Terrell Enterprises Inc. (“Account-3” and “Account-4”).

7. The investigation has revealed that Terrell Fuller controlled Account-3 and Account-4. Terrell Fuller is RAENA’S brother and has pleaded guilty to conspiracy to commit wire fraud related to the above-described criminal activity. *See United States v. Terrell Fuller, Crim. No. 24-635 (SRC).*

8. Law enforcement executed a court-authorized search warrant on or about August 10, 2023, of Terrell Fuller’s residence. During the search, law enforcement seized, among other things, a cellular telephone (the “Phone”). Law enforcement subsequently observed that the Phone contained Telegram Messenger (“Telegram”)¹ communications between Terrell Fuller and RAENA.

9. The communications included the following:

- a. A September 11, 2021 message from RAENA to Terrell Fuller that included the name, address, and date of birth of the individual (“Individual-1”) that opened Account-1.

¹ Telegram Messenger is a messaging application that can be installed on electronic devices, including cellular telephones. The application provides end-to-end encrypted chats and video calling, among other features.

- b. A September 23, 2021 message from RAENA to Terrell Fuller that was an image of an account summary for Account-1.
- c. An October 18, 2021 message from RAENA to Terrell Fuller that was an image of an Internal Revenue Service communication containing the name and EIN of the entity whose name was used to open Account-2.
- d. An October 20, 2021 message from RAENA to Terrell Fuller that was an image of a communication from Bank-2 confirming the opening of Account-2.
- e. May 7, 2022 messages between RAENA and Terrell Fuller wherein they discussed Terrell Fuller giving RAENA \$55,000.
- f. May 10, 2022 messages between RAENA and Terrell Fuller wherein they again discussed Terrell Fuller giving RAENA \$55,000. The two further discussed how an individual (“Individual-2”) could facilitate getting RAENA the money. The investigation, including bank records, has revealed that: (a) Individual-2 opened a bank account (“Account-5”) at RAENA’s instructions; (b) on or about May 13, 2022, Account-2 transferred approximately \$55,000 into Account-5; (c) from its inception through May 17, 2022, Account-5 was solely funded with the \$55,000 transfer and additional deposits totaling approximately \$150; and (d) from May 16-17, 2022, two withdrawal slips containing Individual-2’s signature were submitted in connection with withdrawals from Account-5 totaling \$55,000.
- g. May 17, 2022 messages between RAENA and Terrell Fuller indicating that RAENA received \$20,000 (the amount of the first of the two withdrawals from Account-5).
- h. May 17, 2022 messages later in the day between RAENA and Terrell Fuller indicating that Individual-2 “got the bread”. Based upon my training and experience and this investigation, I believe these messages are evidence that RAENA received the remaining \$35,000.

10. According to a representative of Business-1, Business-1 did not make the Application.

11. A representative of the SBA later confirmed that Business-1 did not make the Application, did not receive any benefit, and that the EIDL was therefore fraudulently obtained.

Account-6

12. On or about December 5, 2022, an individual (“Individual-3”) opened a bank account ending in 4197 at Bank-3 (“Account-6”).

13. Video surveillance and additional records demonstrate that on December 16, 2022, an individual deposited a check (“Check-1”) in the amount of approximately \$150,000 into Account-6. Prior to the deposit of Check-1, Account-6 had a balance of approximately \$100.

14. According to a representative of the payor listed on Check-1 (the “Check-1 Payor”): (a) the payor information on Check-1 was accurate; but (b) the payee’s name and address listed on Check-1 had been changed.

15. On or about February 6, 2023, Bank-3 returned approximately \$105,000 of the \$150,000 from the deposit of Check-1 to Check-1 Payor’s financial institution. The funds were returned after the Check-1 Payor’s financial institution made a claim for return of funds stating, in substance and in part, that Check-1 was a counterfeit check.

16. The investigation has revealed that prior to February 6, 2023, approximately \$45,000 of the \$150,000 of funds in Account-6 had been withdrawn.

17. The investigation, including Telegram messages reviewed by law enforcement, further revealed that Terrell Fuller instructed Individual-3 to open and make withdrawals from Account-6.

18. Telegram messages reviewed by law enforcement also reveal RAENA’S involvement with and profit from the fraudulent cashing of Check-1. Among other things, the messages include:

- a. A December 22, 2022 message wherein RAENA asked Terrell Fuller, in substance and in part, whether Check-1 had cleared.
- b. A December 22, 2022 image sent by Terrell Fuller to RAENA indicating that Check-1 had cleared. Shortly thereafter, Terrell Fuller messaged RAENA, “Good to go”.

c. In response, RAENA sent an approximately two-second video to Terrell Fuller. A screenshot of the video follows:



d. December 22, 2022 messages wherein RAENA and Terrell Fuller discuss RAENA getting her cut of a withdrawal made from Account-6. In one message, RAENA provided wiring information for the funds, specifically wiring instructions for an account in RAENA's name. In response to Terrall Fuller asking what the wiring instructions were for, RAENA replied "my cut."

Additional Fraud

i. *Check-2*

19. On or about June 28, 2022, a check ("Check-2") in the amount of approximately \$73,000 was deposited into Account-5. The Check was made payable to the business name that Account-5 was opened under.

20. The investigation has revealed that Check-2 was fraudulent. Among other things, on June 28, 2022, RAENA sent Terrell Fuller a Telegram message that was an image of the true version of Check-2. The true version of Check-2 had a different payee than the version of Check-2 deposited into Account-5. RAENA told Terrell Fuller, "This what he used". Based upon my training and experience and the investigation to date, RAENA was telling Terrell Fuller that the true version of Check-2 was used to make the fraudulent version of Check-2 that was deposited into Account-5.

21. On that same date, RAENA also sent Terrell Fuller, through Telegram, an image of the receipt from the financial institution for Account-5 confirming the deposit of Check-2 into Account-5.

22. Bank records for Account-5 and other information obtained during the investigation reveal that in July 2022 approximately \$9,500 was sent from Account-5 to RAENA. Specifically, a money transfer application was used to send the approximately \$9,500 from Account-5 to an account associated with a telephone number that the investigation has revealed RAENA used at that time.

ii. ***The 2022 Fraud***

23. In addition, the investigation has revealed that in 2019, RAENA opened linked checking and savings accounts in her name (together, the “RAENA Account”). The investigation has revealed that on or about April 6, 2022, a check in the amount of approximately \$48,000 was deposited into the RAENA Account. The financial institution holding the RAENA Account has advised law enforcement, in substance and in part, that the financial institution for the listed payor on the check determined that the check was fraudulent.

24. The investigation has revealed that RAENA received almost all of the fraudulently obtained money associated with the April 6, 2022 check. Among other things, a search of an account in RAENA’s name revealed the following image, which was taken on the same date that \$42,000 was withdrawn from the RAENA Account:

