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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : Hon. Cathy L. Waldor  
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 v. : Mag. No. 22-9159  
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 NANA YAW MARFO : **CRIMINAL COMPLAINT**  
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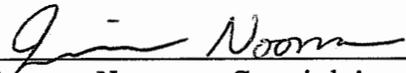
I, Special Agent Jimena Noonan, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

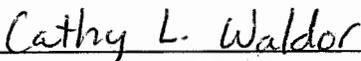
I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Jimena Noonan, Special Agent  
Federal Bureau of Investigation

Special Agent Noonan attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 6th day of April, 2022.

  
\_\_\_\_\_  
Hon. Cathy L. Waldor  
United States Magistrate Judge

**ATTACHMENT A**  
**(Money Laundering Conspiracy)**

From in or around October 2020 through the present, in the District of New Jersey and elsewhere, the defendant

**NANA YAW MARFO**

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. Nana Yaw Marfo was a resident of Virginia.
  - b. Marfo maintained several business bank accounts in the names of at least two business entities: Real Deal Fitness DMV LLC and N&K Export Import LLC, (collectively, the "Marfo Entities"), including those outlined herein.
  - c. Marfo maintained a business bank account in the name of N and K Export Imports LLC ("N&K Bank Account-1"), which Marfo opened on or about May 4, 2021. Marfo was the sole signatory to the account until on or about July 13, 2021, when Marfo added a relative (the "Marfo Relative") as a second signatory to this account.
  - d. Marfo maintained a business account in the name of N and K Export Imports LLC ("N&K Bank Account-2"), for which Marfo was a signatory and then on or about July 12, 2021, the Marfo Relative was added as a second signatory to the account.
  - e. Marfo maintained a business bank account in the name of Real Deal Fitness DMV LLC ("Fitness Bank Account-3"). Marfo was a signatory to this account and on or about July 21, 2021, the Marfo Relative was added as a second signatory to this account.
  - f. Marfo maintained a business bank account in the name of Real Deal Fitness DMV LLC ("Fitness Bank Account-4"), for which Marfo was a signatory and opened on or about March 10, 2021.
  - g. Marfo maintained a personal bank account in his name ("Marfo Bank Account-5").

- h. Bank Account-6 and Bank Account-7 were each bank accounts maintained by an individual who resided in New Jersey who also laundered money obtained from romance scam victims.
- i. On or about March 18, 2020, the Families First Coronavirus Response Act (“FFCRA”) was signed into law. The FFCRA provided additional flexibility for state unemployment insurance agencies and additional administrative funding to respond to the COVID-19 pandemic. Then, the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was signed into law on or about March 27, 2020. It expanded states’ ability to provide assistance to many workers impacted by COVID-19, including for workers who are not ordinarily eligible for UI benefits. The CARES Act provided for Pandemic Unemployment Assistance (“PUA”), which initially provided for up to 39 weeks of benefits to individuals who were: (1) self-employed, seeking part-time employment, or otherwise would not qualify for regular UI or extended benefits under state or federal law or PEUC under Section 2107 of the CARES Act; and (2) unemployed, partially unemployed, unable to work, or unavailable to work due to specific COVID-19 related reasons. Under the PUA provisions of the CARES Act, business owners, self-employed workers, independent contractors, or gig workers can qualify for PUA benefits if they previously performed such work in the state and were unemployed, partially unemployed, unable to work, or unavailable to work due to a COVID-19 related reason.
- j. 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.

**Marfo’s Money Laundering Scheme:**

2. As set forth below, there is probable cause to believe that Marfo is laundering: (1) the proceeds of internet-enabled romance scams through business bank accounts held in the name of the Marfo Entities; and (2) fraudulently obtained PUA payments.

3. After receiving money that was obtained from romance scam victims, Marfo withdrew some of the fraud proceeds, transferred some of the money to purchase a house in his wife’s name, and wired hundreds of thousands of dollars to overseas bank accounts, including accounts in China, Italy, Singapore, and Mauritius.

4. While the investigation remains ongoing, law enforcement believes that Marfo has received into his business bank accounts more than approximately \$4.7 million in fraudulent proceeds and has received at least approximately \$47,800 in PUA payments from Ohio.

**Victim-1:**

5. Victim-1,<sup>1</sup> a resident of Ohio and Florida, was the victim of a romance scam who, as part of the scam, was directed to send money to N&K Bank Account-1, Bank Account-6, and Bank Account-7.

6. Victim-1 met an individual purporting to be "Terry Soller" on a dating website. "Terry Soller" said that he worked as a doctor for the United Nations and was currently in Syria. "Terry Soller" said that he needed money so that another individual, "Markus Richards," could hand-deliver "Terry Soller's" property from Syria to the United States. "Terry Soller" told Victim-1 that he needed Victim-1 to send money to "Markus Richards" on his behalf because there were no banks in Syria.

7. "Terry Soller" continued the fraudulent narrative with Victim-1, stating that "Markus Richards" got detained in Belgium and in the United States and they needed Victim-1 to send money for his release. The investigation to date has revealed that "Terry Soller" has instructed Victim-1 to send more than \$400,000 to various bank accounts controlled by suspects across the United States for "Terry Soller's" benefit.

8. As is common in romance scam fraud schemes, when Victim-1 said she did not have additional money to send to "Terry Soller," "Terry Soller" responded with emotionally charged rhetoric, threatening that: "I feel like killing myself to escape this pain and it'll be on you. . . . [T]rust me that'll be the beginning of both our reputations getting ruined; most especially yours."

9. On or about June 4, 2021, "Markus Richards" instructed Victim-1 to deposit a cashier's check into N&K Bank Account-1. On or about June 7, 2021, Victim-1's cashier's check in the approximate amount of \$50,000 was deposited into N&K Bank Account-1.

10. On or about June 30, 2021, "Terry Soller" instructed Victim-1 to send a \$50,000 wire to Bank Account-6 and also instructed Victim-1 to send to be deposited a \$60,000 bank check to an entity controlled by an individual in New Jersey. "Terry Soller" told Victim-1 that he needed this money so he could get out of Syria and to release a package of his that was purportedly being held by the Department of Homeland Security.

11. On or about June 30, 2021, Victim-1 wired through Fedwire approximately \$50,000 to Bank Account-6.

12. On or about June 30, 2021, a cashier's check from Victim-1 in the approximate amount of \$60,000 was deposited into Bank Account-7.

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<sup>1</sup> Victim-1 was advised by law enforcement that she was likely the victim of a romance scam and continued sending money to the alias-using perpetrators. Victim-1 has also taken steps in an attempt to conceal that she provided money to the perpetrators and disclosed to law enforcement that she had taken money from her business and used it to send to "Terry Soller."

13. As a part of the scheme, an individual purporting to be "Fitz Gerald" contacted Victim-1 and falsely claimed to be an FBI agent. "Fitz Gerald" told Victim-1 that for thousands of dollars, he could assist Victim-1 in getting her money back from "Terry Soller." According to records from the email provider, the email account used by "Fitz Gerald" has a Nigerian recovery phone number.

14. On or about July 28, 2021, "Terry Soller" emailed Victim-1 a threat with the subject "DON'T PUSH ME!!" in which he stated: "I'll be looking forward to their different reactions here on Facebook and the public sites as a whole. I wonder what the rabbi's reaction is going to be like as well as your friends, other family members who are yet to find out and your business associates as a whole..You will beg for my attention then when you finalize realize it may be too late."

**Victim-2:**

15. Victim-2, a resident of Minnesota, was also the victim of a romance scam who, as part of the scam, was directed to send money to N&K Bank Account-1 and N&K Bank Account-2.

16. In or around December 2020, Victim-2 met an individual purporting to be named "Mark Johnson" on a dating website for seniors. "Mark Johnson" told Victim-2 that he was a jeweler hired to design gold medals for the World Health Organization for its work surrounding COVID-19. "Mark Johnson" told Victim-2 that he was from Minnesota but was traveling overseas on a work project. Victim-2 sent several wires for the benefit of "Mark Johnson" for what she thought was the shipping costs for gold, customs fees, taxes, and other reasons. In total, Victim-2 wired at least over \$900,000 as a part of the romance scam.

17. As a part of the romance scam, on or about May 12, 2021, Victim-2 wired approximately \$64,000 to N&K Bank Account-1. On or about May 17, 2021 and May 19, 2021, two wire transfers of approximately \$38,965 and \$34,835 were made from N&K Bank Account-1 to accounts in China.

18. As a part of the romance scam, on or about July 19, 2021, Victim-2 wired approximately \$140,000 to N&K Bank Account-2. Shortly thereafter, several large wire transfers were made from N&K Bank Account-2 to entities in China.

19. As a part of the romance scam, on or about July 20, 2021, Victim-2 wired approximately \$140,000 to N&K Bank Account-1.

20. On or about October 25, 2021, law enforcement obtained a seizure warrant to seize up to \$204,000 in fraudulent proceeds from N&K Bank Account-1. On approximately the same day, approximately \$138,432.85 was seized from N&K Bank Account-1.

21. On or about December 23, 2021, law enforcement mailed to a residence in Alexandria, Virginia<sup>2</sup> that was listed on N&K Bank Account-1, N&K Bank Account-2, and Fitness Bank Account-3, a letter to N&K Export Imports LLC, to the attention of Marfo and the Marfo Relative (the "Fraud Seizure Letter"). The Fraud Seizure Letter notified Marfo and the Marfo Relative that the money from N&K Bank Account-1 was seized as a result of wire fraud and was subject to forfeiture. The letter advised further that Marfo or Marfo Relative could contest the forfeiture of the funds. Law enforcement did not receive a forfeiture claim for the funds within the time outlined in the Fraud Seizure Letter.

**Victim-3:**

22. Victim-3, a resident of Georgia, was also the victim of a romance scam who, as a part of the scam, was directed to write checks payable to N&K Export Imports LLC.

23. Victim-3 met a man purporting to be named "William John Powell" on an online app. "William John Powell" told Victim-3 that he worked on an oil rig, had gotten into an accident in Mexico, and needed a loan from Victim-3 until he could repay her with a twenty million dollar check he had in his possession. As a part of the romance scam, Victim-3 sold her house to obtain money so she could send to help "William John Powell."

24. At "William John Powell's" direction, on or about July 22, 2021, Victim-3 sent two checks that were made payable to N&K Export Import LLC, each in the approximate amount of \$70,000. On or about July 23, 2021, both checks were deposited into N&K Bank Account-1.

25. "William John Powell" directed Victim-3 to write on these checks that the checks were for "goods and services" and told Victim-3 that if the bank asked what the checks were for, she should say that she was buying a piece of equipment for her brother.

26. In addition to sending checks, Victim-3 also transferred debit cards on "William John Powell's" behalf and provided "William John Powell" with access to her email account; "William John Powell" maintained access to the email account even after Victim-3 changed her password.

27. On or about February 18, 2022, "William John Powell" sent Victim-3 a screenshot of the first page of the Fraud Seizure Letter that advised Marfo and the Marfo Relative of the seizure of funds from Victim-2. "William John Powell" told Victim-3 that he was in a hospital in Mexico and relayed further that, as purportedly evidenced by the Fraud Seizure Letter, N&K Export Imports told "William John Powell" that Victim-3's money was frozen at N&K Bank Account-1.

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<sup>2</sup> On or about March 31, 2022, the Marfo Relative was observed exiting this residence.

**Victim-4:**

28. Victim-4, a resident of Oregon, was also the victim of a romance scam who, as part of the scam, was directed to send checks payable to the Marfo Entities.

29. In or around April 2021, Victim-4 met an individual who purported to be "Brian Glenn" on a dating website for seniors. Victim-4 communicated with "Brian Glenn" via an online encrypted messaging app. "Brian Glenn" repeatedly asked Victim-4 for money to help him travel to the United States to date Victim-4. "Brian Glenn" promised that he would pay Victim-4 back the money she sent on his behalf. "Brian Glenn" sent Victim-4 a purported copy of a bank account that appeared to contain approximately a million dollars as "proof" that he could pay her back for money she sent on his behalf. "Brian Glenn" directed Victim-4 to send checks for his benefit. In total, Victim-4 sent approximately over \$1.8 million for the benefit of "Brian Glenn."

30. As a part of the romance scam, on or about June 17, 2021, Victim-4 wrote a check for approximately \$100,000, made payable to Real Deal Fitness DMV LLC. On or about June 21, 2021, Victim-4's check was deposited into Fitness Bank Account-3. On approximately June 23, 2021, Marfo withdrew approximately \$85,000 from Fitness Bank Account-3.

31. On or about the same day, Marfo transferred \$14,500 and \$500 from Fitness Bank Account-3 to Fitness Bank Account-4. On or about the same day, June 23, 2021, Marfo wired approximately \$15,000 from Fitness Bank Account-4 to a title service company to purchase a house in Lorton, Virginia.

32. As a part of the romance scam, on or about June 17, 2021, Victim-4 also wrote a check in the approximate amount of \$100,000 payable to N&K Export Imports LLC. On or about June 21, 2021, Victim-4's check was deposited into N&K Bank Account-1. On or about June 23, 2021, Marfo deposited approximately \$85,000 from Fitness Bank Account-3 into N&K Bank Account-1 and received into N&K Bank Account-1 a wire transfer from another entity in the approximate amount of \$115,000. On or about the same day and the following day, Marfo wired approximately \$185,850 and \$112,375, respectively, to an entity in China named "Sincere Industrial (H.K.) Co. Ltd." ("Sincere Industrial China").

33. As a part of the romance scam, on or about July 8, 2021, Victim-4 wrote another check in the approximate amount of \$140,000 payable to N&K Export Imports LLC. On or about July 9, 2021, Victim-4's check was deposited into N&K Bank Account-1. On or about July 13, 2021, Marfo transferred from N&K Bank Account-1 approximately \$23,933 to an account in Italy and approximately \$107,367 to Sincere Industrial China.

34. As a part of the romance scam, on or about July 19, 2021, Victim-4 wrote a check in the approximate amount of \$135,000 to Real Deal Fitness

DMV. On or about July 20, 2021, Victim-4's check was deposited into Fitness Bank Account-3.

**Victim-5:**

35. Victim-5,<sup>3</sup> a resident of North Carolina, was a victim of a romance scam who, as part of the scam, was directed to send checks payable to the Marfo Entities.

36. Victim-5 met an individual who he thought was named "Marcia Brown" and communicated with her via email. Starting in or around December 2019, "Marcia Brown" told Victim-5 that she loved him and that she needed his help finding a good investigator or lawyer in the United States who could fly to Ghana to help "Marcia Brown" get approximately \$150 million worth of gold bars shipped to Victim-5 in the United States. Through the course of the scam, "Marcia Brown" told Victim-5 that she needed assistance with hotel bills, rent, surgeries, scan, testing, and lawyers.

37. On or about April 22, 2021, Victim-5 emailed with "Marcia Brown" and told her that he had sent a check in the amount of approximately \$41,150.

38. On or about April 22, 2021, a check written by Victim-5 for approximately \$41,450 payable to Real Deal Fitness DMV LLC was deposited into Fitness Bank Account-3.

39. As a part of the scam, Victim-5 was eventually introduced to an individual who purported to be named "Raymond Awuah," with whom Victim-5 communicated through the Internet. "Raymond Awuah" purported to be a private investigator from Ghana who could help Victim-5 recover money he had lost as a part of Internet scams if Victim-5 kept sending money to accounts at "Raymond Awuah's" direction.

40. On or about May 17, 2021, a check written by Victim-5 for approximately \$3,920 payable to N&K Export Imports LLC was deposited into N&K Bank Account-1.

41. On or about May 19, 2021, "Raymond Awuah" messaged with Victim-5 and asked Victim-5 to call his bank to see if \$41,280 had successfully been withdrawn from Victim-5's bank account. Later on in the same conversation, "Raymond Awuah" instructed Victim-5 to send approximately \$27,000. "Raymond Awuah" also referenced N&K Exports Imports as the name of the entity that should receive Victim-5's funds.

42. On or about May 20, 2021, a check written by Victim-5 for approximately \$41,280 payable to N&K Exports Imports LLC was deposited

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<sup>3</sup> During the course of the romance scam, Victim-5 took money from his company to provide for the benefit of "Marcia Brown."

into N&K Bank Account-1. Marfo's signature appears on the back of the check as an endorsement.

43. On or about June 10, 2021, a check written by Victim-5 for approximately \$27,000 payable to N&K Exports Imports LLC was deposited into N&K Bank Account-1. Marfo's signature appears on the back of the check as an endorsement.

44. On or about June 26, 2021, a check written by Victim-5 for approximately \$37,330 made payable to N&K Export Imports LLC was deposited into N&K Bank Account-1.

**Victim-6:**

45. Victim-6, a resident of Ohio, was also a victim of a romance scam who, as a part of the scam, wired money to N&K Bank Account-2.

46. According to Victim-6, she met "Bruce Anderson" in approximately 2018 through an online dating website for seniors. Victim-6 believed that she was in a romantic relationship with "Bruce Anderson" for three years and had communicated with him via video chat. "Bruce Anderson" told Victim-6 that he lived in West Virginia but was born in Italy. In furtherance of the romance scam, "Bruce Anderson" sent Victim-6 a copy of his purported U.S. passport.

47. "Bruce Anderson" told Victim-6 that he inherited a business involved with rare stones and diamonds. He traveled to the United Kingdom as part of the business and was in the Netherlands trying to coordinate the release of diamonds. "Bruce Anderson" asked Victim-6 to loan him approximately \$58,000 purportedly to pay taxes on some of the "rare stones."

48. More specifically, "Bruce Anderson" instructed Victim-6 to send him money through N&K Bank Account-2 and told Victim-6 that the account could send the money to him overseas. According to "Bruce Anderson," he needed Victim-6 to send him the money because his bank accounts were frozen as a result of his depositing "bad" traveler's checks.

49. On or about July 7, 2021, Victim-6 wired approximately \$58,000 to N&K Bank Account-2. On or about July 9, 2021, Marfo executed two wire transfers from N&K Bank Account-2 to bank accounts in China, one in the name of "Guangzhou Mengjie Daily Necessities," the other in the name of "Huaruitai Steel Company Limited."

**Victim-7:**

50. Victim-7, a resident of Ohio, was also the victim of a romance scam who, as a part of the scam, was directed to send a check payable to Real Deal Fitness DMV LLC.

51. In approximately 2021, Victim-7 was contacted via email by an individual purporting to be named "George Jennings," with whom she communicated through an online app. "George Jennings" claimed to be serving in the U.S. Army overseas. "George Jennings" asked Victim-7 for

money on a routine basis, and Victim-7 estimated that she sent approximately \$150,000 for the benefit of "George Jennings."

52. On or about July 2, 2021, a check written by Victim-7 payable to Real Deal Fitness DMV LLC in the approximate amount of \$15,000 was deposited into Fitness Bank Account-3. On or about July 7, 2021, Marfo made two cash withdrawals from Fitness Bank Account-3 of approximately \$10,000 and \$1,000.

**Ohio PUA Payments:**

53. Starting at least by in or around October 2020, Marfo began receiving into Marfo Bank Account-5 several deposits from PUA obtained from Ohio. For example, in January 2021, Marfo Bank Account-5 received over 40 deposits from PUA, approximately 13 of which were reversed as fraudulent. In total, Marfo Bank Account-5 received at least approximately \$47,800 of PUA payments from Ohio.

54. In addition to receiving PUA payments from Ohio, Marfo Bank Account-5 had numerous withdrawals from ATMs in Accra, Ghana.