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

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
:
v. : Mag. No. 22-9158
:
CHEVON BRAXTON : **CRIMINAL COMPLAINT**

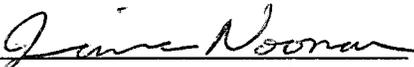
I, Jimena Noonan, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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:

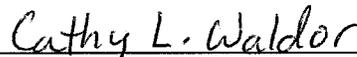
SEE ATTACHMENT B

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 January 2017 through the present, in the District of New Jersey and elsewhere, the defendant

CHEVON 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. Chevon Braxton was a resident of Maryland.
 - b. Braxton maintained accounts at two different credit unions ("Account-1" and "Account-2"), both of which were used to launder the proceeds of romance scams.
 - c. Braxton maintained a bank account at a bank ("Bank Account-3"), which was also used in an attempt to launder the proceeds of a romance scam.
 - d. Bank Account-4 and Bank Account-5 were each bank accounts maintained by an individual who resided in New Jersey who also laundered money obtained from romance scam victims.
 - e. Bank Account-6 was a business bank account located in Kearney, New Jersey.
 - 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.

Chevon Braxton's Money Laundering Scheme:

2. As set forth below, there is probable cause to believe that Braxton is laundering the proceeds of internet-enabled romance scams through her credit union and bank accounts. Specifically, after receiving money obtained from romance scam victims, Braxton withdrew a large portion of the fraud proceeds as cash.

3. While the investigation remains ongoing, law enforcement believes that Braxton has received at least approximately \$1.3 million in fraudulent proceeds.

Victim-1:

4. Victim-1,¹ 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 Bank Account-3, Bank Account-4, and Bank Account-5.

5. 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.

6. "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.

7. 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."

8. On or about June 30, 2021, "Terry Soller" instructed Victim-1 to send a \$50,000 wire to Bank Account-4 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.

9. On or about June 30, 2021, Victim-1 wired through Fedwire approximately \$50,000 to Bank Account-4.

10. 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-5.

¹ 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."

11. 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.

12. On or about July 1, 2021, "Fitz Gerald" instructed Victim-1 to wire money to Bank Account-3.

13. 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:

14. 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-1.

15. 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.

16. 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.

17. As a part of the romance scam, Victim-2 was directed to wire money to several different accounts, including Account-1. On or about January 30, 2019, Victim-2 sent through Fedwire a wire of approximately \$23,900 to Account-1.

18. On or about the same day, January 30, 2019, Braxton transferred approximately \$9,000 to an account held by her sister ("Sister"). Braxton's Sister withdrew approximately \$5,000 and \$2,000 from her account on or about January 31, 2019 and February 1, 2019, respectively.

19. On or about January 31, 2019, Braxton made approximately three withdrawals from her account totaling approximately \$7,300.

20. An investigator at the credit union that maintained Account-1 called Braxton in early 2019 to discuss suspicious wire activity on her account, which was followed by suspicious cash withdrawals. Braxton told the investigator that the wire transfers were from friends who wanted to help her, because she had been injured and was on crutches, so Braxton reached out to friends to ask for help. Braxton stated further that she was taking out cash withdrawals because she needed lots of cash for her daughter's wedding. In approximately February 2019, the investigator called Braxton again to ask about a wire transfer that was coming into her account, which listed a different address in New York City for Braxton. Braxton confirmed that the wire transfer was intended for her.

21. 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-1.

22. On or about March 6, 2019, Victim-2 sent another wire of approximately \$12,000 to Account-1 via Fedwire.

Victim-3:

23. 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-2.

24. 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."

25. 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. The check was deposited into Account-2 and posted on or about August 12, 2019. Thereafter, Braxton made two cash withdrawals of approximately \$2,000 and \$7,500 on or about August 13, 2019 and August 19, 2019, respectively.

26. 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. The check was deposited into Account-2. Following

the deposit, Braxton made several cash withdrawals from the account, all in amounts under \$10,000.

27. As a part of the romance scam, Victim-3 was instructed to deposit funds into a Bank Account-6. On or about September 30, 2020, Victim-3 obtained a cashier's check for approximately \$72,500 to deposit into Bank Account-6. 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-6.

28. 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.