

**"UNDER SEAL"**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

**FILED**  
CHARLOTTE, NC  
JUL 19 2017  
US DISTRICT COURT  
WESTERN DISTRICT OF NC  
3:17-cr-00215-RJC

UNITED STATES OF AMERICA )  
)  
)  
v. )  
)  
(1) JOHN WAYNE PERRY, JR. )  
(2) RHONDA RENEE SCOTT )  
(3) TIMOTHY SCOTT, SR. )  
(4) PARIS JONTUE TAYLOR )  
(5) RAYSHAWN LAMONT TYLER )  
\_\_\_\_\_ )

DOCKET NO.

**BILL OF INDICTMENT**

Violation:

- 18 U.S.C. § 1343
- 18 U.S.C. § 1349
- 18 U.S.C. § 1956(h)

**THE GRAND JURY CHARGES:**

At the specified times and at all relevant times:

1. From at least January 2013 to in or about November 2014, the defendants operated a fraudulent debt collection company known at various points as RJ Financial Services and/or Nationwide Asset & Recovery, collectively "RJ Financial" which defrauded thousands of debtors throughout the United States out of more than \$3 million dollars. The defendants executed their scheme to defraud by coercing purported debtors to pay money, some of which was not even owed, by providing false and misleading information and using harassing and abusive tactics.

**Entities and Individuals**

2. RJ Financial was organized and/or operated by Defendants JOHN WAYNE PERRY, JR., (PERRY), RAYSHAWN TYLER (TYLER), and PARIS TAYLOR (TAYLOR) and began operating in Mecklenburg County in or about November 2012, remaining in operation until the Federal Bureau of Investigation executed a search warrant in November 2014.

3. Miranda Bailey, a co-conspirator unindicted herein, worked at RJ Financial from in or about May 2013 through in or about November 2014. During that time, Bailey served as a collector and team leader or supervisor. Bailey generally used the alias or "shake" name "Savannah Grant" when talking to purported debtors.

4. Defendant PERRY was, at all relevant times, a leader of the RJ Financial conspiracy and an owner, operator, and leader of RJ Financial.

5. Defendant RHONDA SCOTT ("R. SCOTT") worked at RJ Financial from in or about March 2013 through in or about November 2014. During that time, R. SCOTT served as a

collector and team leader or supervisor. R. SCOTT generally used the aliases or “shake” names “Ada Brown” or “Katlin Pierce” while talking to purported debtors.

6. Defendant TIMOTHY SCOTT, JR. (“T. SCOTT”) worked at RJ Financial from in or about March 2013 through in or about November 2014. During that time, T. SCOTT served as Operations Manager. T. SCOTT generally used the aliases or “shake” names “Dean McCoy,” “Michael Hickman,” “George Raffino,” “Randy Freeman,” or “Berman Maxwell” while talking to purported debtors.

7. Defendant PARIS TAYLOR was, at all relevant times, a leader of the RJ Financial conspiracy and an operator and leader of RJ Financial. TAYLOR generally used the aliases or “shake” names “Brittany Martin” or “London Taylor” when talking to purported debtors.

8. Defendant RAYSHAWN TYLER was, at all relevant times, a leader of the RJ Financial conspiracy and an owner, operator, and leader of RJ Financial.

#### **Interaction between the Fraudulent Debt Collection Companies**

9. Another of the fraudulent debt collection companies operating in Mecklenburg County between in or about November 2011 and in or about May 2015 was known at various points as Capital Solutions Agency and/or Berkeley Hughes and Associates and/or The Vortex Group, collectively “BHA.”

10. Cedric Clark, a co-conspirator unindicted herein, was, at all relevant times, the leader of the BHA conspiracy and the sole owner, operator, and leader of BHA.

11. Before joining RJ Financial, T. SCOTT helped Clark learn the business, and then T. SCOTT ran the operations business side of BHA for Clark. In that role at BHA, T. SCOTT assisted in hiring, provided scripts for use by collectors, monitored collectors’ calls, and closed the calls or did “talk-offs,” including pretending to be an attorney to assist in fraudulently inducing purported debtors to make payments.

12. Before joining RJ Financial, Bailey and R. SCOTT were collectors at BHA.

13. RJ Financial and BHA worked together and operated in much the same manner. For example, in addition to overlap in employees and scripts, RJ Financial and BHA purchased purported debt accounts together, splitting the lists and the costs, and RJ Financial also paid Clark for skip-tracing services to help locate the purported debtors.

#### **The Fraudulent Debt Collection Scheme**

14. RJ Financial and BHA operated in the following manner:

a. They purchased lists of purported debtors. These lists were often sold and resold, so that the same purported debtors were called by multiple companies, attempting to collect on the same purported debt.

b. They then engaged in or caused others to engage in a process commonly known as “skip-tracing” to locate biographical information about the purported debtor, including, for example, the person’s phone number, address, and social security number. The collectors then utilized this information to call the purported debtors and to induce the purported debtors into talking with them.

c. Then, depending on the company and the timing, messages were either left for purported debtors using a dial service or collectors called the purported debtors individually, generally using prepared scripts that contained numerous false and fraudulent representations.

d. As part of the script used by the fraudulent debt collection companies, including RJ Financial and BHA, purported debtors were asked whether they wished to “handle this matter in or out of court!” Depending on the response, collectors either switched to a “rebuttal” script, *i.e.*, a script that responded to whatever reason the purported debtor gave for not paying, or engaged in a conversation to “settle” the debt with either a payment plan or a one-time payment.

e. Often, either before offering or agreeing to a settlement figure, the collector placed the purported debtor on hold and pretended to consult with a fictitious person, who was often falsely represented to be an attorney.

f. Collectors then either processed the payment or transferred the call to another individual, *i.e.*, a manager, a payment processor, and/or a “closer,” to take the payment.

15. In making calls, the collectors were generally instructed to follow a script or scripts that included false and misleading information designed to scare purported debtors into paying monies. For example, among the false and/or fraudulent representations in the script(s) utilized at RJ Financial and BHA were that:

a. The collector was calling “to investigate and possibly file 2 charges against you in (Debtor’s local county court)” and that those charges included “Breach of contract or fraud” and “Malicious intent to defraud a financial institution.”

b. “We have reviewed all of the case file; and it has been determined that this is a definite case of breach of contract....”

c. “According to the language of this contract; our client has the right to pursue you for up to 378% of the original balance if this contract is breached....”

d. “Federal law does require that I inform you that you do have the right to offer a counter offer; most defendants offer close to what they originally borrowed, plus the \$300 civil penalty...assessed by the state....”

16. Further, in order to disguise the fraudulent nature of their business and scare purported debtors, the fraudulent debt collection companies, including RJ Financial and BHA, often misrepresented who they were in one or more ways. For example,

a. They frequently changed the name of the purported company they were working for when making calls so that a purported debtor would not be able to locate truthful information about the company, and, more particularly complaints against the company, on the internet, and to conceal or disguise the ownership and/or control of the proceeds of the fraud. For example, among the fictitious company names used by PERRY, TYLER, and TAYLOR and their co-conspirators at RJ Financial were: Piedmont Investigations and Procurement; Raffino, Garrison & McCoy; Harling Hill Scott & Associates; Hillman, Scott & Associates; ARS & Associates; Holland Dempsey & Associates; Kinsey Kline & Associates; Berman Maxwell & Associates; Department of Fraud; and Express Payment Services.

b. In some instances, they falsely represented that they were law firms, that they had attorneys on staff to consult, and/or that the collectors themselves were attorneys.

c. In other instances, they falsely represented themselves to be members of law enforcement or falsely represented that they were working with or affiliated with law enforcement, sometimes going as far as to play a police scanner in the background.

d. In other instances, they utilized names intended to give the false impression they were working with the government, including, for example, "Department of Fraud."

e. They instructed collectors to use aliases, commonly known as "shake" names, when making the calls and to fraudulently identify themselves as an "investigator" purportedly calling on behalf of a "client."

17. These fraudulent debt collection companies, including RJ Financial and BHA, also often engaged in one or more other scare tactics to fraudulently induce purported debtors to pay them, including, for example,

a. Harassing family members and friends to get the purported debtor to call them and pay them.

b. Threatening that imminent civil and/or criminal charges would be filed if the purported debtor did not make arrangements to pay during the call.

c. Threatening that a process server or the sheriff was prepared to serve them with papers, including, for example, arrest warrants, subpoenas, restraining orders, and garnishment of wages, if they did not make arrangements to pay during the call.

18. As owners, operators and leaders of RJ Financial, PERRY, TAYLOR, and TYLER were involved in, among other things:

a. Setting up the company;

b. Hiring and firing of RJ Financial employees;

c. Purchasing the lists of purported debtors to be called, including purchasing said lists using proceeds obtained from prior fraudulent collections;

- d. Setting up the dialer/phone service to be used by collectors in calling victims;
- e. Arranging for RJ Financial to “spoof” phone numbers to make it appear that collectors were calling from areas/places they were not;
- f. Arranging for the “skip-tracing” of purported debtors by purchasing these services, using proceeds from prior fraudulent collections, from other fraudulent debt collection companies, including BHA, after RJ Financial was rejected by the company that performs “skip-tracing”;
- g. Listening to and/or reviewing recordings of calls made by collectors to ensure that the scripts, including the false and misleading statements therein, were used during the calls and that collectors went “hard” enough on the purported debtors;
- h. Setting up the service that web based software application that was used to manage the collection operations;
- i. Setting up accounts with the payment processors that would be used by RJ Financial to process credit card payments from the victims, including setting up accounts in company names that were different than those used by the collectors to obtain the fraudulent proceeds; and/or
- j. Facilitating the creation of multiple websites to be used, each with a fake company name, after the prior name/website/phone numbers were “burned,” *i.e.* exposed as fraud so as to also conceal or disguise the existence of the company and individuals actually conducting the fraudulent transactions and who had ownership or control over the fraudulent proceeds.

19. Also as owners, operators, and leaders, PERRY, TAYLOR, and TYLER were listed as owners and/or authorized signers on the RJ Financial bank accounts through which millions of dollars of fraudulent proceeds were funneled and each had unfettered access to those proceeds.

20. As a result of the false and fraudulent representations and harassing and abusive tactics used by RJ Financial, Bailey, PERRY, R. SCOTT, T. SCOTT, TAYLOR, and TYLER, thousands of individuals throughout the United States were fraudulently induced to pay debts (a) that often were not owed; (b) that were outside of the statute of limitations; and/or (c) to companies that were not authorized to collect on such debts.

#### **Examples of Fraudulent Debt Collection Calls**

21. As a collector, Bailey made many calls to purported debtors and their friends and families in which she made false and fraudulent representations and engaged in harassing and abusive tactics intended to scare individuals into paying purported debts. For example,

- a. On August 27, 2013, Bailey a/k/a Savannah Grant, left a message for K.B. at the number of “a possible relative or associate of” K.B., and falsely represented that she was contacting him “on behalf of Philadelphia County.” She further falsely represented

she was calling related to “an ongoing investigation which names [him] as a person of interest,” stating that she did “need to verify a place of employment to complete a service of process with Philadelphia County.” And, that if there was “no response within twenty-four hours, at that point, the case will be turned over to the County Deputy and they will execute the legal documents to [his] current place of employment or [his] residence.”

b. On August 27, 2013, Bailey a/k/a Savannah Grant, called the employer of A.B., purporting to call on behalf of “Los Angeles County Sheriff Department,” and asking to speak with a supervisor, to “try to get the company’s protocol for a service of process, to serve these legal documents” to Victim A.B.

c. On or about August 28, 2013, Bailey a/k/a Savannah Grant called Victim L.B. and spoke with his wife, falsely informing her that she was contacting the Victim “on behalf of Monroe County, with the Department of Fraud” because “we have a case here” regarding “some charges that are formalized against him with Monroe County.” She went on to falsely represent that the Victim “is facing some very serious charges and if [she doesn’t] get in contact with [the Victim], [she] will issue a warrant for his arrest.” Bailey then informed the wife that it was actually her son that “was the subject of our investigation” and falsely tells the her that her son is “facing some bank fraud charges he committed” she needs to contact her son and “let him know that he needs to get in contact with [Bailey] or [she] will take him into custody while he is at work or if he is at home.”

22. R. SCOTT made many calls to purported debtors and their friends and family in which she made false and fraudulent representations and engaged in harassing and abusive tactics intended to scare individuals into paying purported debts. In her role as a supervisor, R. SCOTT also made false and fraudulent representations and engaged in harassing and abusive tactics in an attempt to solicit payments from purported debtors transferred to her after the callers she supervised were unable to get payment. For example,

a. On or about November 3, 2014, R. SCOTT a/k/a Katlin Pierce was transferred a call from Victim C.S. R. SCOTT posed as an Arbitration Supervisor and falsely represented she “was supposed to be signing off on [the victim’s] documents for legal proceedings” because Victim C.S. was “not willing to resolve this matter voluntarily at this time.” When the Victim represented that she had taken care of the matter but did not have her card with her to allow the collector to debit her account, R. SCOTT then falsely represented that she did “have to sign off on [Victim C.S.’s] documents on [sic] today.”

b. On or about November 4, 2014, R. SCOTT a/k/a Katlin Pierce was transferred a call from Victim C.B. who was in California and received a call before 7 a.m. In her role as a supervisor, R. SCOTT falsely represented that she did not know who “Mark Strong” was because they had “over 400 employees in this office.” Victim C.B. asked for a Supervisor because “Mark Strong” had falsely informed Victim C.B.’s minor daughter that the Victim “was going to be arrested.”

23. T. SCOTT made many calls to purported debtors and their friends and family in which he made false and fraudulent representations and engaged in harassing and abusive tactics

intended to scare individuals into paying purported debts. In his role as a supervisor, T. SCOTT also made false and fraudulent representations and engaged in harassing and abusive tactics in an attempt to solicit payments from purported debtors transferred to him after the callers he supervised were unable to get payment. For example,

a. On or about October 18, 2013, T. SCOTT a/k/a Dean McCoy spoke with N.L., the husband of a purported debtor previously called at her work by someone at RJ Financial. T. SCOTT falsely represented that the debt was “a 378% interest bearing account” and that “after the fourteen days that’s when we get involved,” falsely representing that “a lot of people confuse us with bill collection agencies because we do do some recovery. But most bill collection agencies what they’re gonna do; they’ll probably take a payment from you or set you up on some type of payment plan and then once that its over what they’ll do is sell the remaining balance according to the language of the contract down the line.” T. SCOTT went on to falsely represent that “Here, we place a motion in the courts so that it will prevent the plaintiff’s from selling any portion of your wife’s balance once it’s settled out and closed she’ll get a release of lien order whereby if she keeps that on her files that will protect her from any future engagement or communication.” When the husband asked about a payment plan or payment schedule, concerned that “this is some sort of a fraudulent call,” T. SCOTT responded that “because of the forceful recovery that the plaintiff’s are requesting...she has the right to take care of this and she has the right not to. [RJ Financial is] not going to go back and forth and engage her again [as they] have the proper digital recordings to prove in court that [they] have offered all the information relevant to the case that will benefit the plaintiff from going forward with litigation or prosecution.” T. SCOTT went on to falsely represent that RJ Financial would “go forward with the action. That’s not a threat. That’s what happens.” And when the husband asked for a phone number for the company with which the debt purportedly originated, T. SCOTT responded that they “don’t have a phone number they can furnish for direct contact” because “once they sold it off to a collection agency I don’t know what else they can provide you” and went on to falsely represent that “the very best thing that I would advise was what we had to do is subpoena her First National Banking information.”

b. On or about October 18, 2013, T. SCOTT a/k/a Dean McCoy spoke with N.L. the spouse of a victim, who called because someone from a number associated with RJ Financial had “called the school that [his] wife works at and said that they’re with the Wichita County Sheriff’s Office trying to get a hold of her.” T. SCOTT fraudulently represented that he was “sitting here listening to all the conversations. That 100% positive, [he] know[s] that’s not true.” T. SCOTT went on to falsely represent that “that was the independent locators, letting them know that how was there protocol for process servers because some organizations don’t allow process servers to come on their property, so at that time if that’s their policy they have to enlist the services of the sheriff’s department to come and execute that service of process.” When the Victim’s husband then asked if he could have documents sent to his email “that shows where this [the debt] was,” T. SCOTT responded that they would provide two pieces of documentation – the credit card authorization form and the settlement in full/conditional release letter.

c. N.L. then called T. SCOTT a/k/a Dean McCoy back and asked for a “copy of the proof of original debt,” which T. SCOTT refused to do saying, “No. That’s part of the evidential disclosure clause, sir. If we are going to liquidate the entire debt, one of the first things, as I stated, I’m sure they’re not just going to hand over information that they are going to use to get their judgment. Because they subpoenaed the bank information.” When N.L. responded that the “FTC states that when trying to settle this thing, that if .. [there is] a request a copy of proof of the original debt...”, T. SCOTT interrupted him to say that “we’ve already covered. The FTC compliant, that validation letter was sent out” at an earlier date to an earlier address. T. SCOTT further stated that “if she didn’t receive it, if she didn’t respond to it, or if she’s moved, sir, that’s not the plaintiff’s fault. That has already been done and complied with. That is what’s done in the collections stage.” T. SCOTT then said that he’s now “getting agitated” because he’s “going out of his way to help [him] and [his] wife” and he’s “had attorneys sign off on the situation,” refusing to provide any validation of debt and telling him that “at this point there is a highly discounted settlement on the table for probably less than 30 more seconds. I need to know what you all are going to do,” to which N.L. responded that “all [he] want[s] is proof of the original debt.” In response, T. SCOTT informed him that they were “going to press forward with having [his] wife served at her place of employment.”

24. Other collectors employed by PERRY, TAYLOR, and TYLER and supervised by Bailey, R. SCOTT, and/or T. SCOTT also made many calls to purported debtors and their friends and families in which they made false and fraudulent representations and engaged in harassing and abusive tactics intended to scare individuals into paying purported debts. For example,

a. On or about August 28, 2013, a collector using the alias “Investigator Valez” called the brother of a Victim and falsely informed him that she was “calling reference to a Bear Court case that’s pending for him currently” and she needs “either another number to reach him or I need someone to get a message to him that he needs to get in touch with me immediately.” When the brother asked what this was in reference to, Valez fraudulently represented that she was “calling from the Fraud Department” and went on to falsely state that the brother “has two cases that are currently pending.”

b. On or about October 17, 2014, a collector using the alias “Investigator Pierce” contacted Victim T.S. falsely informing her that he is contacting her “because [her] name has come up as a person of interest in an ongoing investigation.” He went on to falsely represent that what he does “is pre-litigations, ma’am, I do investigations, process and serving, bounty hunting, and abdications of warrants.” Pierce went on to falsely represent the victim “did breach the contract” and telling her that “there currently two charges that would be possible to file against you, which is a breach of contract or fraud and malicious intent to defraud a financial institution.” Pierce then fraudulently represented that “what we do is pre-litigations before it goes to your county clerk’s office.” When the Victim represented that she spoke to someone previously and informed them that she had filed bankruptcy, Pierce falsely informed her that “you were able to put the balance that you owe in the bankruptcy, but you were not able to put in the check charges, that’s check fraud, this is a check fraud case.”



c. On or about October 17, 2014, a collector using the alias "Kelly Saxton" called Victim S.C. falsely representing that she was with "the Mediations Department" and "was giving [her] a call today in regards to pending allegations that's been forwarded over to our office" falsely representing that "what we need is a verbal deposition statement from you and to inform you of some information in case you are engaged by sheriffs." When the Victim asked what the call was in regards to, Sexton falsely represented that the Victim "has pending allegation against [her] for breach of contract as well as malicious intent to defraud a financial institution for check fraud." When Victim S.C. represented that she "had some fraud charges" associated with her account "because someone had stole [her] identity" and that she was also in the process of doing a bankruptcy, Sexton fraudulently represented that because she "did not go downtown and fill out an affidavit for identity theft, it won't stand in court" and then told her "if you can retain [herself] [a] defense attorney to represent [her] in this case" and that she will "have to retain [herself] a criminal attorney." She then falsely stated that "if that attorney is not retained by October the 29, what's gonna happen is that they're still gonna go ahead and proceed legally to possibly have you appear in front of the Judge" and "go on with the judgement amount" and "what [she's] gonna be receiving is a possible charge for worthless checks."

25. In addition to collecting purported debt themselves, as team leaders, supervisors, and/or managers, Bailey, R. SCOTT, and T. SCOTT also, *inter alia*, (1) listened to the calls of other collectors to ensure that they were following the scripts provided when talking to purported debtors and (2) would sometimes have calls transferred to them from the collectors they supervised so that they could "close" the call and/or could process payments from purported debtors.

### **Money Laundering**

26. During the course of the fraudulent debt collection scheme, PERRY, TAYLOR, and TYLER conspired to promote their fraud and to engage in multiple financial transactions greater than \$10,000.00 derived from the proceeds of the fraudulent debt collection companies and involving interstate commerce. For example,

a. On or about March 5, 2014, TAYLOR withdrew \$12,164.04 of proceeds derived from the fraudulent debt collection conspiracy from Account \*3572;

b. On or about March 5, 2014, TAYLOR withdrew \$14,154.17 of proceeds derived from the fraudulent debt collection conspiracy from Account \*3572, which PERRY then deposited into Account \*685;

c. On or about March 18, 2014, TAYLOR withdrew \$30,000 of proceeds derived from the fraudulent debt collection conspiracy from Account \*3572;

d. On or about April 9, 2014, PERRY withdrew \$27,172.74 of proceeds derived from the fraudulent debt collection conspiracy from Account \*7685 and obtained a cashier's check for the same amount, which he combined with \$6,040 in cash to obtain an \$33,200 cashier's check which he then used to purchase a 2006 Quattroporte Maserati;

e. On or about April 9, 2014, PERRY withdrew \$47,069.71 of proceeds derived from the fraudulent debt collection conspiracy from Account \*3572, depositing

that amount into Account \*4005. That same day, \$30,000 of the proceeds was wired to Clark from Account \*4005, which were subsequently wired back to Account \*4005 on or about April 11, 2014;

f. On or about April 14, 2014, TYLER withdrew \$30,000 of proceeds derived from the fraudulent debt collection conspiracy from Account \*4005 and obtained a \$30,000 cashier's check, which he used to purchase additional debt accounts from Clark, the owner of another fraudulent debt collection company, BHA;

g. On or about April 28, 2014, TYLER withdrew another \$30,000 of proceeds derived from the fraudulent debt collection conspiracy from Account \*4005 and obtained a \$30,000 cashier's check which he used to purchase additional debt accounts from Clark;

h. On or about May 20, 2014, PERRY wrote a check to Cedric Clark from Account \*4005 for \$26,650, representing proceeds derived from the fraudulent debt collection conspiracy, which he used to pay Clark, the owner of another fraudulent debt collection company, BHA, for use of TLO, the "skip-tracing" service used to locate purported debtors;

i. On or about October 22, 2014, TYLER withdrew \$29,162 of proceeds derived from the fraudulent debt collection conspiracy from Account \*4005 and obtained a cashier's check for \$29,160, which he used to purchase fourteen used cars to be sold by Clark as part of Clark's auto business; and

j. On or about December 16, 2015, TYLER wrote himself a check from Account \*3490 for \$50,000 and cashed it, again representing proceeds derived from his fraudulent debt collection company.

**COUNT ONE**  
**18 U.S.C. § 1349**  
**(Fraudulent Debt Collection Conspiracy)**

27. The Grand Jury re-alleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 26 of this Bill of Indictment, and further alleges that:

28. From in or about January 2013 through in or about November 2014, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the Defendants,

- (1) JOHN WAYNE PERRY, JR.**
- (2) RHONDA RENEE SCOTT**
- (3) TIMOTHY SCOTT, SR.**
- (4) PARIS JONTUE TAYLOR**
- (5) RAYSHAWN LAMONT TYLER**

did knowingly combine, conspire, confederate, and agree with each other, Miranda Bailey, Cedric Clark and others known and unknown to the Grand Jury, to commit offenses against the United States, including violations of Title 18, United States Code, Sections 1341 (mail fraud) and 1343 (wire fraud).

**Objects of the Conspiracy**

29. It was a part and an object of the conspiracy that Defendants, and others known and unknown to the Grand Jury, having devised schemes and artifices to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, to wit, schemes and artifices to defraud individuals of money, would and did cause things to be deposited with and delivered by the U.S. Postal Service and private and commercial interstate carriers for the purposes of executing said schemes and artifices, in violation of Title 18, United States Code, Section 1341.

30. It was a part and an object of the conspiracy that Defendants, and others known and unknown to the Grand Jury, having devised schemes and artifices to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, to wit, schemes and artifices to defraud individuals of money, would and did transmit and cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purposes of executing said schemes and artifices, in violation of Title 18, United States Code, Section 1343.

**Manner and Means**

31. Defendants and others carried out the conspiracy in the manner and means described in paragraphs 1 through 26 of this Bill of Indictment, among others.

All in violation of 18 U.S.C. § 1349.

**COUNT TWO**  
**18 U.S.C. § 1343**  
**(Wire Fraud Scheme)**

32. The Grand Jury realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 26 of this Bill of Indictment, and further alleges that:

33. From in or about January 2013 through in or about November 2014, in Mecklenburg County, within the Western District of North Carolina and elsewhere, Defendants,

- (1) JOHN WAYNE PERRY, JR.**  
**(2) RHONDA RENEE SCOTT**  
**(3) TIMOTHY SCOTT, SR.**  
**(4) PARIS JONTUE TAYLOR**  
**(5) RAYSHAWN LAMONT TYLER**

did knowingly and intentionally devise the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, did cause to be transmitted by means of wire communication in interstate commerce writings, signals, and sounds, to wit, obtaining funds from victims throughout the United States by means of interstate wires and engaging in fraudulent telephone calls to induce the payment of such funds.

All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT THREE**  
**18 U.S.C. § 1956(h)**  
**(Conspiracy to Commit Money Laundering)**

34. The Grand Jury realleges and incorporates by reference herein the allegations contained in paragraphs 1 through 26 of the Bill of Indictment, and further alleges that:

35. From in or about January 2013 through in or about November 2014, in Mecklenburg and Union Counties, within the Western District of North Carolina and elsewhere, the defendants,

- (1) JOHN WAYNE PERRY, JR.**  
**(4) PARIS JONTUE TAYLOR**  
**(5) RAYSHAWN LAMONT TYLER**

did knowingly combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury, to commit offenses against the United States, to wit, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, with the intent to promote the carrying on of specified unlawful activity and to conceal and disguise in whole and in part the nature, location, source, ownership, and control of the proceeds of a 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 in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) (promotion money laundering), and 1956(a)(1)(B)(i) (concealment money laundering) and to knowingly engage and attempt to engage in monetary transactions affecting interstate and foreign commerce in property that was criminally derived from specified unlawful activity and was in excess of \$10,000, knowing the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1957.

**NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

36. Notice is hereby given of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under Section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by Section 981(a)(1)(C). The following property is subject to forfeiture in accordance with Section 982 and/or 2461(c):

a. All property which constitutes or is derived from proceeds of the violations set forth in this Bill of Indictment;

b. All property involved in such violations or traceable to property involved in such violations; and

c. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) or (b) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a) and (b).

37. The following property is subject to forfeiture on one or more of the grounds stated above:


a. A forfeiture money judgment in the amount of at least \$3 million, such amount constituting the proceeds of the violations set forth in this Bill of Indictment.

A TRUE BILL



JILL WESTMORELAND ROSE  
UNITED STATES ATTORNEY

  
MARIA K. VENTO  
ASSISTANT UNITED STATES ATTORNEY

  
WILLIAM MILLER  
ASSISTANT UNITED STATES ATTORNEY