



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN,

Defendant.

UNDER SEAL

Case No. 1:24-CR-2 (TSE)

Counts 1-14: 18 U.S.C. § 1343
(Wire Fraud)

Counts 15-17: 18 U.S.C. § 1957
(Unlawful Monetary Transactions)

Counts 18-19: 18 U.S.C. § 1028A
(Aggravated Identity Theft)

Forfeiture Notice

INDICTMENT

January 2024 Term — Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNTS 1 - 14

Wire Fraud (18 U.S.C. § 1343)

At all times material to this Indictment, and all dates below being on or about the dates indicated, and all dollar amounts being approximate:

Introductory Allegations

1. Defendant PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN (“the defendant” or “LELIS BOLIN”) was a national of Brazil and resided in Arlington, Virginia, in the Eastern District of Virginia.
2. Individual A resided in California. Individual A’s parents were foreign nationals.

3. Individual B resided and worked in Washington, D.C. Individual B's company, also based in Washington, D.C., employed LELIS BOLIN for a period of time at the outset of the events described below.

4. Individual C was an attorney in Texas and an associate of Individual B. Individual C sought assistance for a foreign employee who needed work visa assistance, and Individual B directed him to LELIS BOLIN for assistance.

5. "Nicole Stone" was a false name used by a friend of LELIS BOLIN, at LELIS BOLIN's direction, to falsely impersonate a supposed employee of a Texas real estate investment company, for the purpose of lulling Individual A and to attempt to obtain further monies from Individual A.

6. "Jeffrey Willardsen" was a false name and false persona created and used by LELIS BOLIN to impersonate a supposed employee of a Texas real estate investment company, for the purpose of lulling Individual A and to attempt to obtain money from Individual A.

7. Individual F. M. was a real person who was a licensed attorney and notary public. Individual F.M. did not give LELIS BOLIN lawful permission to use his name, his signature, or his notary stamp, or to alter the notary stamp in any way.

8. Individual P.A.R. was a real person, and the father of Individual A. Individual P.A.R. did not give LELIS BOLIN lawful permission to use his name on falsified immigration documents.

9. LELIS BOLIN banked at Wells Fargo, a "financial institution" within the meaning of Title 18, United States Code, Section 20, and Title 31, United States Code, Section 5312(a)(2).

10. Individuals A and C, and the brother of Individual A, each banked at a “financial institution” within the meaning of Title 18, United States Code, Section 20 and Title 31, United States Code, Section 5312(a)(2).

11. Burke and Herbert Bank was a “financial institution” within the meaning of Title 18, United States Code, Section 20 and Title 31, United States Code, Section 5312(a)(2).

12. The U.S. Citizens and Immigration Services (“USCIS”) organization administered the EB-5 Immigrant Investor Program, under which investors were eligible to apply for lawful permanent residence if they made qualifying financial investments in a commercial enterprise in the United States that would create or preserve full-time jobs for qualified U.S. workers. To obtain an EB-5 visa, a foreign person needed to make a qualifying investment in a United States business enterprise that would generate jobs for Americans. An EB-5 visa was a path to lawful permanent residency in the United States. A qualifying investment under the EB-5 program would require many hundreds of thousands of dollars from the immigrant investor.

13. The E-2 visa program was also an employment-based visa but was for a shorter duration of U.S. residency, did not provide the same pathway to lawful permanent residency, and did not carry the same capital investment requirements that the EB-5 visa program did.

14. In or about September 2021, Individual A sought assistance obtaining legal permanent United States residence for his parents, to include Individual P.A.R. Individual A’s acquaintance, Individual B, had referred Individual A to LELIS BOLIN, who initially assisted Individual A with E-2 visas.

15. On September 22, 2021, Individual A entered a contract with LELIS BOLIN that indicated LELIS BOLIN would provide legal representation for Individual A and his parents for the litigation and application for E-2 and EB-5 visas.

16. Individual C sought assistance from LELIS BOLIN, who falsely promised him she would use his money to pay for costs associated with a work visa for a foreign employee.

17. From in or about September 2021 through in or about July 2023, in the Eastern District of Virginia and elsewhere, the defendant,

PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN,

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud Individual A and others, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, by making materially false misrepresentations regarding investments that purportedly qualified under the EB-5 visa program and in connection with work and fees supposedly associated with E-2 visas. In executing the scheme, among other falsehoods, LELIS BOLIN lied about her professional qualifications, her interactions with United States government agencies, courts, and officials, and misrepresented financial transactions allegedly conducted on behalf of her clients, all the while misappropriating investor funds for her personal use, including for the downpayment on her Arlington, Virginia, townhouse, bathroom renovations, and payment of personal credit card debts.

Ways, Manner, and Means of the Scheme

18. The defendant executed the scheme through various ways, manner and means, including but not limited to:

- a. falsely posing as an immigration attorney able to practice in United States federal district courts and before immigration courts;
- b. fabricating false court documents and providing them to Individual A;

c. falsely promising Individual A that his funds would be invested in a Texas real estate project and otherwise used for services and government fees to obtain EB-5 visas for Individual A's parents' visas;

d. falsely promising and misrepresenting to Individual C that she would use his funds for costs and fees associated with a visa for Individual C's foreign employee;

e. providing falsified receipts to Individual A, intended for Individual A and his brother, in an attempt to lull them and to obtain additional funds, such receipts falsely showing that their funds had gone to a Texas real estate project, when, in truth and in fact, they had not;

f. falsifying government documents, including USCIS Form I-797C, to indicate receipt of EB-5 investment funds, and affixing the name of Individual P.A.R. to the falsified forms;

g. falsifying a General Warranty Deed for a Texas investment property, including fabricating or altering a notary seal and forging the signature of a real notary public, Individual F.M.;

h. inducing victims, including Individual A, the brother of Individual A, and Individual C, to send interstate bank wire transfers of funds to her personal Wells Fargo bank account in the Eastern District of Virginia;

i. creating email accounts associated with false personas of individuals purportedly associated with the Texas real estate investment project;

j. crafting and sending, or causing to be sent emails from the fake personas in the Eastern District of Virginia to Individual A located outside of the Commonwealth of Virginia;

k. recruiting and managing others to play roles posing as such individuals on phone and video calls with a victim in order to lull the victim and to attempt to obtain more money under false pretenses;

l. threatening victims and their families with legal action, referral to collection services, and revocation of legal status, if she did not receive more funds from victims; and

m. misappropriating victim money for her own personal gain.

Object of the Scheme

19. It was a purpose and object of the scheme for the defendant to enrich herself and fund her lifestyle at the expense of immigrant investors and others.

Executions of the Scheme

20. On or about the dates indicated in the table below, in the Eastern District of Virginia and elsewhere, the defendant,

PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN,

having knowingly devised and intending to devise the aforementioned scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowingly transmitted and caused to be transmitted, by means of wire communications in interstate and foreign commerce writings, signs, signals, pictures, and sounds for the purpose of executing the above-described scheme and artifice to defraud, as indicated below, each count being a separate offense:

<u>Count</u>	<u>Approx. Date</u>	<u>Description</u>
1	09/22/2021	Email from LELIS BOLIN to Individual A with attachment of a legal agreement for LELIS BOLIN to represent Individual A and his parents in the visa application process.

<u>Count</u>	<u>Approx. Date</u>	<u>Description</u>
2	09/28/2021	\$11,645.00 wire transfer initiated by Individual A from Individual A's JPMorgan Chase bank account to LELIS BOLIN's Wells Fargo bank account.
3	11/18/2021	\$125,000.00 wire transfer initiated by Individual A from Individual A's JPMorgan Chase bank account to LELIS BOLIN's personal Wells Fargo bank account.
4	01/14/2022	Email from LELIS BOLIN to Individual A with attachment of a fraudulent "Motion for Immigration Process" in which LELIS BOLIN falsely represented herself as an attorney.
5	02/11/2022	Email from LELIS BOLIN to Individual C indicating an immigration judge authorized LELIS BOLIN to continue with a process, and that LELIS BOLIN would file a motion in court the following week.
6	02/17/2022	\$28,000 bank wire transfer initiated by Individual C from a JPMorgan Chase Bank account to LELIS BOLIN's personal Wells Fargo bank account.
7	12/14/2022	Email from "Amanda Smith" to Individual A attaching falsified General Warranty Deed that was dated March 20, 2022.
8	03/08/2023	\$44,000.00 bank wire transfer from the brother of Individual A to LELIS BOLIN's personal Wells Fargo bank account.
9	05/17/2023	Telephone call between LELIS BOLIN and Individual A in which LELIS BOLIN falsely told Individual A he would be able to sell an apartment in Texas after Individual A paid taxes due.
10	05/19/2023	Email from "Nicole Stone" to Individual A and LELIS BOLIN asking for Individual A's parents' contact information.
11	05/19/2023	Email sent from "Jeffrey Willardsen" to Individual A stating that if payment of taxes is not made, Willardsen would have to notify immigration; that Individual A's parents' visas would be revoked; and that Willardsen would take legal action.

<u>Count</u>	<u>Approx. Date</u>	<u>Description</u>
12	05/23/2023	Telephone call between "Nicole Stone" and Individual A, in which LELIS BOLIN's associate falsely posed as a real estate development company employee.
13	05/26/2023	Email from LELIS BOLIN to Individual A attaching 11 falsified receipts purportedly showing that Individual A's bank wire transfers to LELIS BOLIN had been paid to a Texas real estate development fund.
14	05/30/2023	Email from "Amanda Smith" to Individual A attaching 11 falsified USCIS Forms I-797C.

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

COUNTS 15 - 17**Unlawful Monetary Transactions (18 U.S.C. § 1957)**

THE GRAND JURY FURTHER CHARGES THAT:

21. The allegations set forth in Paragraphs 1 through 20, and Counts 1 through 14, inclusive, of this Indictment are re-alleged and incorporated by reference as if set forth herein.

22. On or about the dates indicated below, in the Eastern District of Virginia and elsewhere, the defendant,

PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN,

knowingly engaged in, and attempted to engage in, a monetary transaction by, through, and to a financial institution in criminally derived property of a value greater than \$10,000, in and affecting interstate or foreign commerce, as described in the table below, each count being a separate offense, and such property involved in each count having been derived from specified unlawful activity, that is the proceeds of the wire fraud scheme alleged in Counts 1 through 13 of this Indictment:

<u>Count</u>	<u>Approx. Date</u>	<u>Description of Unlawful Monetary Transaction</u>
15	12/06/2021	\$109,933.51 wire transfer from LELIS BOLIN's Wells Fargo bank account to a real estate settlement company's Burke & Herbert bank account as downpayment on her personal residence in Arlington, Virginia.
16	01/18/2022	\$12,038.80 payment from LELIS BOLIN's Wells Fargo bank account to a Northern Virginia remodeling company.
17	07/05/2022	\$15,358.81 ACH payment from LELIS BOLIN's Wells Fargo bank account to American Express.

(All in violation of Title 18, United States Code, Sections 1957 and 2).

COUNTS 18 – 19**Aggravated Identity Theft (18 U.S.C. § 1028A(a)(1))**

THE GRAND JURY FURTHER CHARGES THAT:

23. The allegations set forth in paragraphs 1 through 20, and Counts 1 through 14, inclusive, of this Indictment, are realleged and incorporated as if set forth in full herein.

24. On or about the dates indicated below, each count being a separate offense, in the Eastern District of Virginia and elsewhere, the defendant,

PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN,

did knowingly possess and use without lawful authority a means of identification of another person, as indicated in the table below, during and in relation the felonies enumerated in 18 U.S.C. § 1028A(c)(5), to wit, the felony in Chapter 63 of Title 18 of the United States Code as specifically indicated below, knowing that the means of identification belonged to another actual person:

<u>Count</u>	<u>Approx. Date</u>	<u>Means of Identification</u>	<u>Enumerated Title 18 Felony By Section</u>
18	12/14/2022	Name, signature, and altered notary seal of Individual F.M., and name of Individual P.A.R., on General Warranty Deed that was dated March 20, 2022.	Section 1343 (Wire Fraud)
19	05/30/2023	Name of Individual P.A.R. on falsified USCIS Form I-797C.	Section 1343 (Wire Fraud)

(All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2).

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

Pursuant to Federal Rule of Criminal Procedure 32.2(a), Defendant PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN is hereby notified that, if convicted of wire fraud as alleged in Counts 1 - 14 of this Indictment, the Defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

Pursuant to Federal Rule of Criminal Procedure 32.2(a), Defendant PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN is further notified that, if convicted of unlawful monetary transactions as alleged in Counts 15 - 17 of this Indictment, the Defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the violation, and any property traceable to such property.

If any property that is subject to forfeiture is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to 21 U.S.C. § 853(p) and Fed. R. Crim. P. 32.2(e).

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The property subject to forfeiture includes but is not limited to the following:

- real property and improvements located at 2615 S. Kenmore Court, Arlington, Virginia 22206, also described as Lot 152, Section 2, Shirlington Crest, as appears in Deed Book 4151 among the land records of Arlington County, Virginia;
- a sum of money equal to at least \$694,299.82 in United States currency;

the above representing the amount of proceeds obtained as a result of the offense in Counts 1-17 of this Indictment.

(In accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1); Title 28, United States Code, Section 2461(c); Title 21, United States Code, Section 853(p); and Rule 32.2(a), Federal Rules of Criminal Procedure.)

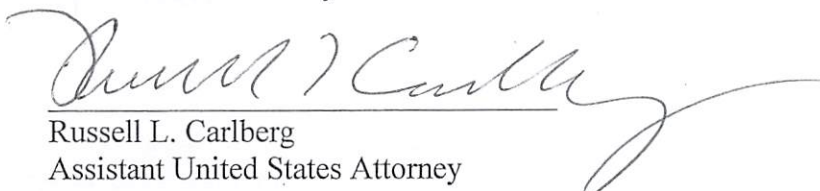
A TRUE BILL:

**Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office**

GRAND JURY FOREPERSON

Jessica D. Aber
United States Attorney

By:



Russell L. Carlberg
Assistant United States Attorney