

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

TRUE AND CERTIFIED COPY



UNITED STATES OF AMERICA : Hon. Madeline Cox Arleo
:
v. : Crim. No. 22-778 (MCA)
:
CHARLES SINGLETON : 18 U.S.C. § 1956(h)
: 18 U.S.C. § 1956(a)(1)(B)(i)
: 18 U.S.C. § 2

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE

(Money Laundering Conspiracy – 18 U.S.C. § 1956(h))

1. At times relevant to this Indictment:

a. Defendant Charles Singleton (“SINGLETON”) was a resident of California and formed the business entities Everything You Need Electronics and Accessories LLC and Top of the Line Electronics & Technology [sic] LLC (the “Singleton Entities”).

b. The Singleton Entities held multiple business bank accounts at various banks, which were controlled by SINGLETON, including the following:

- 1) Account at Citibank, N.A. ending in 2603;
- 2) Account at Wells Fargo Bank, N.A. ending in 6842;
- 3) Account at JP Morgan Chase & Co. ending in 0630; and
- 4) Account at Bank of America Corporation ending in 0805.

c. Co-conspirator 1 and Co-conspirator 2 were residents of

California.

d. A business email compromise was a method of wire fraud often targeting businesses, entities, or individuals working on business transactions involving high-dollar wire transactions. The fraud was carried out by compromising, hacking, and/or “spoofing” legitimate email accounts through social engineering or computer intrusion techniques to cause employees of the target company (or other individuals involved in legitimate business transactions) to conduct unauthorized transfers of funds, most often to accounts controlled by the fraud perpetrators.

e. 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.

The Conspiracy

2. From in or around September 2018 through in or around August 2020, in the District of New Jersey, and elsewhere, the defendant

CHARLES SINGLETON,

did knowingly and intentionally conspire and agree with others, including Co-conspirator 1 and Co-conspirator 2, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, namely, wire fraud, contrary to Title 18, United States Code, Section 1343, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity

and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, contrary to Title 18, United States Code, Sections 1956(a)(1)(B)(i).

The Goal of the Conspiracy

3. The goal of the conspiracy was for SINGLETON, Co-Conspirator 1, Co-Conspirator 2, and others to receive money obtained by fraud, including business email compromises, to U.S.-based bank accounts controlled by SINGLETON and others and to conduct financial transactions in a manner to conceal and disguise the nature, source, and ownership of the funds.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. SINGLETON and other Co-conspirators created businesses and opened business bank accounts to be used to receive and transfer money obtained through business email compromises and other fraudulent schemes.

b. Co-conspirators conducted business email compromises and directed unwitting victims to send money to accounts controlled by SINGLETON and other Co-conspirators. For example:

i. From on or about September 26, 2018 to on or about October 24, 2018, a telecommunications construction services company with its office in Tempe, Arizona was fraudulently induced to send five payments totaling approximately \$122,000 (the "Victim-1 Payments") to a bank account controlled

by SINGLETON. The payments were intended for a telecommunications contracting company with its office in Tustin, California.

ii. From on or about June 28, 2019 to on or about July 23, 2019, a telecommunications contractor with its office in Broadview, Illinois was fraudulently induced to send three payments totaling approximately \$86,000 (the "Victim-2 Payments") to a bank account controlled by SINGLETON. The payments were intended for a general contracting company with its office in Beaver, Pennsylvania.

iii. On or about July 10, 2019, an engineering services company headquartered in Dallas, Texas was fraudulently induced to send three payments totaling approximately \$752,000 (the "Victim-3 Payments") to a bank account controlled by SINGLETON. The payments were intended for an electrical equipment supply company in Post Falls, Idaho.

iv. On or about November 6, 2019, a telecommunications contractor with its office in Tempe, Arizona was fraudulently induced to send a payment of approximately \$182,000 (the "Victim-4 Payment") to a bank account controlled by a Co-conspirator. The payment was intended for a construction company with its office in Phoenix, Arizona. On or about November 12, 2019, the Co-conspirator in receipt of the funds wired approximately \$170,000 to a bank account controlled by SINGLETON.

v. On or about June 12, 2020, a resident of Bergen County, New Jersey, was fraudulently induced to send a payment of

approximately \$560,000 to a bank account controlled by Co-conspirator 1. The payment was intended for a law firm with its office in Clifton, New Jersey. On or about June 14, 2020, Co-conspirator 1 wired approximately \$230,000 to an account controlled by Co-conspirator 2.

c. SINGLETON and other Co-conspirators transferred to themselves and to each other and withdrew fraudulently obtained money from multiple accounts to conceal and disguise the nature, location, source, ownership, and control of the proceeds of other Co-conspirators' wire fraud. For example:

i. Between on or about October 5, 2018 and or about October 25, 2018, after receiving the Victim-1 Payments, SINGLETON made ten (10) cash withdrawals for a total of approximately \$119,000.

ii. On or about July 15, 2019, after receiving the Victim-2 Payments and Victim-3 Payments, SINGLETON made two wire transfers of \$200,000 each to two other bank accounts controlled by SINGLETON and made a \$100,000 wire transfer to a Co-conspirator. In the following days, SINGLETON made several cash withdrawals of the fraudulently obtained money from his accounts and made additional large wire transfers.

iii. On or about November 12, 2019, after receiving the Victim-4 Payment, a Co-conspirator sent SINGLETON a wire transfer of \$170,000. In the following days, SINGLETON made several cash withdrawals from his account and transferred \$70,000 to another Co-conspirator.

d. In certain instances, SINGLETON and other Co-conspirators conducted rapid, cash withdrawals, which appeared to be structured in individual amounts to evade the Currency Transaction Report (CTR) filing requirements (i.e., under \$10,000). For example, between on or about June 28, 2019 and or about July 18, 2019, after receiving the Victim-2 Payments and Victim-3 Payments, SINGLETON made seventeen (17) cash withdrawals ranging from \$800 to \$10,000 each, for a total of \$135,300.

e. The Co-conspirators shared among themselves the account information of U.S.-based financial accounts. For example, on or about July 18, 2020, Co-conspirator 1 forwarded to SINGLETON an email from a U.S. Bank regarding the closure of a deposit account held by Co-conspirator-1.

f. SINGLETON and other Co-conspirators prepared fraudulent contracts to disguise and conceal the illegal nature of the criminal proceeds. For example, on or about November 12, 2019, SINGLETON entered into a fictitious contract for a wire of \$70,000 “for the purposes of business investment . . . [i]n order for the purchase of future Holiday Gifts.”

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS TWO THROUGH FOUR

(Money Laundering – 18 U.S.C. §§ 1956(a)(1)(B)(i))

5. Paragraphs 1, 3, and 4 of Count One of the Indictment are re-alleged here.

6. On or about the following dates, in the District of New Jersey and elsewhere, the defendant,

CHARLES SINGLETON,

did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of a specified unlawful activity—that is, wire fraud, in violation of Title 18, United States Code, Section 1343—knowing that the transactions were designed in whole and 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:

COUNT	APPROXIMATE DATE	TRANSACTION
2	July 15, 2019	Causing the transfer of approximately \$200,000 by interstate wire that traveled through New Jersey from an account at Bank-1 to an account at Bank-2.
3	July 15, 2019	Causing the transfer of approximately \$200,000 by interstate wire that traveled through New Jersey from an account at Bank-1 to an account at Bank-3.
4	July 19, 2019	Causing the transfer of approximately \$60,000 by interstate wire that traveled through New Jersey from an account at Bank-2 to an account at Bank-1 controlled by a Co-Conspirator.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION AS TO COUNT ONE THROUGH FOUR

1. As a result of committing the money laundering offenses charged in Counts One through Four of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such money offenses, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other

property of such defendant up to the value of the forfeitable property described
in Forfeiture Allegation paragraph 1.

A True Bill,


Foreperson 

Philip R. Sellinger
PHILIP R. SELLINGER
United States Attorney

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18 U.S.C. § 2

A True Bill,

Foreperson

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