

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 19-cr-567 (RBK)
v. :
CHRISTOPHER G. GLYNN : 18 U.S.C. §§ 1343, 2, and 1957

SUPERSEDING INFORMATION

The United States Attorney for the District of New Jersey charges:

COUNT 1
[WIRE FRAUD, 18 U.S.C. §§ 1343 & 2]

BACKGROUND AND RELEVANT PARTIES AND ENTITIES

1. At all times relevant to this Indictment:
 - a. Defendant CHRISTOPHER G. GLYNN (“defendant GLYNN”) resided in California and managed and controlled several entities (the “Glynn Entities”).
 - b. The Glynn Entities included, among others, U.S. Grant Distribution Group LLC (“USGDG”), also doing business as U.S. Grant & Trust (USG&T); PG Philanthropic Initiative, LLC, also doing business as “PG Philanthropic”; “Perrarus Global Philanthropic Initiative LLC” (“PGPI”); and Perrarus Global LLC. Some of the Glynn Entities maintained bank accounts, which defendant GLYNN controlled, at Wells Fargo Bank.
 - c. “Trust A” was a purported international trust, purportedly funded, according to defendant GLYNN, with several billion dollars, with which defendant GLYNN claimed affiliation.

d. Victim-1 was a resident of Vineland, New Jersey. Victim-1 maintained an IRA account at Fidelity Investments.

e. Victim-2 was Victim-1's spouse. Victim-2 was a resident of Vineland, New Jersey. Victim-2 maintained a checking account at Quorum Federal Credit Union.

f. "Foundation A" was a non-profit animal welfare organization that Victim-1 incorporated on or about September 26, 2014. Victim-1 incorporated Foundation A in order to honor Victim-1's deceased sibling, and Victim-1 hoped to use Foundation A to help or shelter animals.

2. From on or about August 16, 2014 to on or about December 29, 2014, defendant GLYNN engaged in a fraudulent scheme, pursuant to which GLYNN, using the Glynn Entities, fraudulently obtained \$200,000 in investment loans from Victim-1 and Victim-2 (collectively the "Victims"). To execute that scheme, defendant GLYNN falsely represented to the Victims, among other things, that defendant GLYNN would use the \$200,000 for business and legal expenses related to Trust A, USG&T, Foundation A, USGDG, and related business or philanthropic entities; that Trust A would guarantee the \$200,000 in investment loans; that the investment loans would generate specific returns on a preset timetable; and that Victim-1 could use the returns to fund Foundation A and help or shelter animals. However, contrary to his false and fraudulent representations, defendant GLYNN and his associates misappropriated the Victims' money for personal expenses and other unauthorized expenses unrelated to any charitable or business purpose the

Victims sought to advance and defendant GLYNN promised to achieve. The Victims received no returns on their \$200,000 loan and never received their original money back.

THE SCHEME AND ARTIFICE TO DEFRAUD

3. From on or about August 16, 2014 to on or about December 29, 2014, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

CHRISTOPHER G. GLYNN

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud Victim-1 and Victim-2, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice was in substance as set forth below.

OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD

4. The object of the scheme and artifice to defraud was for defendant GLYNN to fraudulently obtain money by inducing the Victims to invest \$200,000, in the form of a business development loan, with an entity that defendant GLYNN controlled, all under false pretenses.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD

Fraudulent Business Development Loan

5. It was part of the scheme and artifice to defraud that from at least on or about August 16, 2014 to on or about December 29, 2014, GLYNN managed and controlled the Glynn Entities, as described above.

6. It was further part of the scheme and artifice to defraud that during this period of time, GLYNN claimed to Victim-1 and Victim-2 that he was affiliated with Trust A, as described above.

7. It was further part of the scheme and artifice to defraud that Glynn made false and fraudulent statements to the Victims about the Glynn Entities, as well as about Trust A, in order to convince Victim-1 and Victim-2 to send GLYNN approximately \$200,000 in the form of a Business Development Loan.

8. It was further part of the scheme and artifice to defraud that GLYNN falsely claimed to Victim-1 and Victim-2 that he would use the \$200,000 Business Development Loan for business and legal expenses that were related to the Glynn Entities and Trust A.

9. It was further part of the scheme and artifice to defraud that GLYNN falsely stated that Trust A was funded with several billion dollars and would “guarantee” the Victims’ Business Development Loan, so that the Victims would not be at risk of losing their money.

10. It was further part of the scheme and artifice to defraud that GLYNN falsely wrote to Victim-1, in an email dated August 20, 2014, that GLYNN had arranged for a conference call regarding the Business Development Loan that included “a direct representative with the NSA (National Security Agency), and a representative from either DHS (Department of Homeland Security) or the FBI.”

11. It was further part of the scheme and artifice to defraud that GLYNN falsely told the Victims, verbally as well as over email, that the

Business Development Loan would generate specific returns, on a specific timetable, which Victim-1 could use to fund Foundation A and help or shelter animals.

12. It was further part of the scheme and artifice to defraud that, in order to set up the Business Development Loan, GLYNN directed the Victims to transfer \$200,000 into a bank account at Wells Fargo that GLYNN controlled in the United States, which had an account number ending in 9055 and was held in the name of PG Philanthropic Initiative LLC.

13. It was further part of the scheme and artifice to defraud that on or about August 21, 2014, defendant GLYNN, based on his false representations, caused Victim-1 and Victim-2 to wire approximately \$20,000 from Victim-2's bank account at Quorum Federal Credit Union to the account at Wells Fargo Bank ending in 9055, which was controlled by defendant GLYNN and which was held in the name of PG Philanthropic Initiative, LLC (the "9055 Account"). Following the Victims' request to Quorum Federal Credit Union to transfer \$20,000 to the 9055 Account controlled by defendant GLYNN, but prior to the money actually being transferred into that account, defendant GLYNN caused a wire message to be transferred within the United States banking system between a location in New Jersey and a location outside of New Jersey, in order to facilitate and effectuate the requested transfer of money.

14. It was further part of the scheme and artifice to defraud that on or about August 22, 2014, defendant GLYNN, based on his false representations, caused Victim-1 to wire approximately \$180,000 from Victim-1's bank account

at Fidelity Investments to the 9055 Account controlled by defendant Glynn. Following the Victims' request to Fidelity Investments to transfer \$180,000 to the 9055 Account, but prior to the money actually being transferred into that account, defendant GLYNN caused a wire message to be transferred within the United States banking system between a location in New Jersey and a location outside of New Jersey, in order to facilitate and effectuate the requested transfer of money.

15. It was further part of the scheme and artifice to defraud that defendant GLYNN used the 9055 Account to temporarily hold money that had been received from the Victims. GLYNN and his associates subsequently used this money for personal expenses or other expenses unrelated to any charitable or business purpose the Victims sought to advance and defendant GLYNN promised to achieve.

EXECUTION OF THE SCHEME

16. On or about August 22, 2014, in Cumberland County, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant

CHRISTOPHER G. GLYNN

did knowingly and intentionally transmit and cause to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals, pictures and sounds. Specifically, GLYNN caused a \$180,000 wire from Victim-1 to be transmitted between a location in New Jersey and a

location outside New Jersey, for the purpose of executing and attempting to execute this scheme and artifice to defraud.

In violation of Title 18, United States Code, Section 1343 and Title 18, United States Code, Section 2.

COUNT 2
[ILLEGAL MONETARY TRANSACTION, 18 U.S.C. § 1957]

1. Paragraphs 1 through 15 of this Superseding Information are hereby incorporated and realleged as if fully set forth herein.

2. On or about August 25, 2014, defendant

CHRISTOPHER G. GLYNN

knowingly engaged and attempted to engage in monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that was derived from a specified unlawful activity, namely wire fraud. Specifically, on or about August 25, 2014, GLYNN withdrew approximately \$18,000 from the 9055 Account that was controlled by GLYNN, as described above.

In violation of Title 18, United States Code, Section 1957.



RACHAEL A. HONIG
Acting United States Attorney

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(Ed. 1/97)