



**ATTACHMENT A**  
**(Money Laundering Conspiracy)**

From in or around 2019 through the present, in the District of New Jersey and elsewhere, the defendants

**MARLIN PERRA, and**  
**LESLIE LALLANDE**

did knowingly, combine, conspire, confederate, and agree with each other and 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), in violation of Title 18, United States Code, Section 1956(h).

## **ATTACHMENT B**

I, Heather Hendershot, 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 the relevant facts; (b) my review of publicly available information; and (c) my review of documentary 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. Marlin Perra and Leslie Lallande were both residents of Florida.
  - b. Perra owned Integrity International Consulting Inc. ("Integrity"), an entity which he used in furtherance of the money laundering conspiracy.
  - c. Through the course of the conspiracy, Perra has maintained at least eight different bank accounts across seven different banks in the name of Integrity. Perra has also received victim money into his personal bank accounts, including an account at Bank-1.
  - d. Lallande and another individual ("Co-Conspirator-1") controlled TigerKat Logistics, Inc., TigerKat Management, Inc., and The Auto Balance, Inc., entities which they used in furtherance of the money laundering conspiracy.
  - e. Lallande and Co-Conspirator-1, through the course of the conspiracy, maintained approximately at least 11 different bank accounts across approximately 8 different banks, all in the name of their business entities, including at Bank-2. Lallande has also received victims' money into his personal bank accounts.
  - f. Co-Conspirator-2 laundered money from romance scam victims and has been charged with money laundering conspiracy in U.S. District Court for the District of New Jersey.

- g. "Daniella Coney" and "Nelson Nyarko" were aliases used by individual(s) who purportedly resided in Ghana and communicated with Perra and Lallande in furtherance of the money laundering conspiracy.
- h. A "romance scam" was a type of Internet-enabled fraud scheme in which a perpetrator pretends to be romantically interested in the victim, who the perpetrator usually meets through an online dating or social media website. Once the perpetrator has duped the victim into believing that they are in a romantic relationship with each other, the perpetrator relays a series of false stories to fraudulently convince the victim, who is often rendered vulnerable by the purported emotional bond they believe to have with the perpetrator, to send items and exorbitant amounts of money to various locations for the benefit of the perceived online lover.
- i. Trade-based money laundering is a common form of money laundering whereby the perpetrators attempt to conceal the illegal nature of crime proceeds by using trade transactions to make the criminal proceeds appear legitimate.
- j. 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 Money Laundering Scheme:**

2. The FBI is investigating a ring of Africa-based perpetrators who are engaging in internet-enabled fraud schemes targeting U.S. citizens. As part of the criminal scheme, several individuals in the United States have joined in a conspiracy to assist the criminal conduct by concealing illegally obtained money largely (though not exclusively) through trade-based money laundering across the U.S. banking system. Perra and Lallande are two such individuals. While the investigation remains ongoing, law enforcement estimates that Perra has laundered over approximately \$2.7 million in fraudulent proceeds and that Lallande and Co-Conspirator-1 have laundered over approximately \$14 million in fraudulent proceeds.

### **Victim-1**

3. Victim-1, a resident of Texas, was a victim of a romance scam who sent money to bank accounts controlled by Perra and by Lallande.

4. Victim-1 met a man named "Damen" on Facebook messenger after "Damen" reached out to Victim-1. "Damen" told Victim-1 that he worked as a telecommunications engineer who lived in California and then moved to the

United Kingdom. "Damen" told Victim-1 that he lost his wallet and credit cards while traveling and asked Victim-1 to send him money to help him, which he promised to repay to Victim-1.

5. During the course of Victim-1's communications with "Damen," a series of events purportedly befell him that required Victim-1 to pay money at his direction. For example, "Damen" told Victim-1 that he had an inheritance and needed her financial assistance in shipping gold bars and jewels that were part of the inheritance. "Damen" told Victim-1 that his own money was frozen by the banks as a result of pending lawsuits that were the result of a jobsite accident where three employees fell and one died.<sup>1</sup>

6. On or about November 7, 2019, Victim-1 transferred approximately \$500 to Perra's personal bank account at Bank-1.

7. On or about the following dates, Victim-1 transferred the following approximate amounts to Lallande's business bank account at Bank-1 in the name of The Auto Balance:

- a. On or about August 13, 2020, Victim-1 transferred approximately \$24,975;
- b. On or about August 19, 2020, Victim-1 transferred approximately \$24,975; and
- c. On or about September 2, 2020, Victim-1 transferred approximately \$25,000.

8. In total, Victim-1 estimates that she sent approximately \$150,000 at the direction of "Damen" as part of the romance scam.

## **Victim-2**

9. Victim-2 was a resident of Mississippi who met an individual he believed was named "Patricia Beckett" on Facebook. "Patricia Beckett" told Victim-2 that she was a pediatrician who worked for the Red Cross and lived in Lebanon.

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<sup>1</sup>I know from my training and experience that the narrative of an overseas worksite accident involving the serious injury or death of a construction or engineering employee is a common narrative used in Africa-based fraud rings. The fraud narrative sometimes requests money for lawyers, a purported criminal case that requires money for a vigorous defense, and money for purported medical bills.

10. "Patricia Beckett" told Victim-2 that she wanted to convert her house into an orphanage to help children and asked Victim-2 for money to help with the cost of construction. "Patricia Beckett" instructed Victim-2 to wire money for the orphanage construction costs to her girlfriend, who "Patricia Beckett" said was named "Marlin Perra."

11. On or about the following dates, Victim-2 wired through Fedwire the approximate amounts below to Perra's personal bank account at Bank-1, which he did at the direction of "Patricia Beckett":

- a. On or about September 5, 2019, Victim-2 wired approximately \$16,110;
- b. On or about September 16, 2019, Victim-2 wired approximately \$35,000;
- c. On or about September 19, 2019, Victim-2 wired approximately \$9,190;
- d. On or about October 24, 2019, Victim-2 wired approximately \$40,509; and
- e. On or about November 5, 2019, Victim-2 wired approximately \$12,000.

12. In total, Victim-2 estimates that he sent approximately \$115,000 for the benefit of "Patricia Beckett." "Patricia Beckett" told Victim-2 that in the process of her trying to return back to the United States, she got into an accident. Victim-2 contacted his Congressional representative, who informed Victim-2 that "Patricia Beckett" was a fraud.

### **Victim-3**

13. Victim-3 was a retired schoolteacher and small business owner who resided in Florida. In or around November 2021, someone purporting to be "Louis Whetherman," ordered approximately 1,000 units of hand sanitizer from Victim-3's small business. "Louis Whetherman" requested that Victim-3 use a company called "Wetland Logistics" to ship the hand sanitizer.

14. Victim-3 communicated with someone purporting to be from "Wetland Logistics" to facilitate that shipment of the hand sanitizer, who quoted Victim-3 costs of shipping for the three orders as approximately \$2,640.00, \$2,880.00, and \$5,470.00. "Louis Whetherman" paid for the hand sanitizer using credit cards. After "Whetherman" paid for the order, Victim-3 wired what she understood to be the cost of the shipping to a bank account in the name of Tiger Kat Management LLC. More specifically, on or about December 10, 2021, "Derrick Johnson" from Wetland Logistics LLC instructed

Victim-3 to send the shipping costs to their parent company, TigerKat Management LLC.

15. "Derrick Johnson" provided Victim-3 with bank information for Victim-3 to send the shipping costs, which was a business bank account in the name of TigerKat Management LLC at Bank-2, a bank account controlled by Lellande and Co-Conspirator-1.

16. Bank records reflect that on or about December 10, 2021, Victim-3 sent three wires in the approximate amounts of \$2,850, \$2,610 on or about December 10, 2021, and approximately \$5,470 on or about December 13, 2021, to TigerKat Management LLC's business bank account at Bank-2.

17. After Victim-3 paid for the shipping costs, the credit cards that "Louis Whetherman" used to pay for the order recalled the charges. Victim-3, as a result, did not ship the hand sanitizer. Victim-3 contacted "Wetland Logistics" to retrieve her shipping costs, but "Wetland Logistics" claimed that they had returned the shipping money forwarded over by Victim-3 to "Louis Whetherman."

18. On or about January 10, 2022, "Daniella Coney" emailed Lallande a letter titled "Letter of Agreement Between [Victim-3] and Leslie Joseph Lallande (Tigerkat Management LLC)." The letter states that Victim-3 had an agreement with Lallande to invest in the auto business, and that Victim-3 wired approximately \$2,640, \$2,880, and \$5,470 to TigerKat Management LLC to purchase vehicles. The letter states further that: "I [Victim-3] have no intention of calling that money back or reporting to my bank it's fraud." The letter bears what purports to be Victim-3's signature.

19. According to a representative at Bank-2, Lallande provided the above-described letter to bank representatives in connection with the transactions from Victim-3.

20. Law enforcement showed Victim-3 the above-described letter agreement described above, and Victim-3 confirmed that it was fraudulent. Victim-3 stated that she had never seen the letter before and did not sign the letter, nor did Victim-3 invest in cars with Lallande.

#### **Victim-4**

21. Victim-4 was a resident of Colorado who met an individual purporting to be named "Sonya Corvey" on an online dating website in or around September 2020. "Sonya Corvey" told Victim-4 that she was attempting to finalize an inheritance from her late father. According to "Sonya Corvey," the United Kingdom maintained possession of her inheritance consisting of precious metals, specifically millions of dollars' worth of gold, and

Corvey needed Victim-4's financial support to meet the United Kingdom's stipulations to receive these metals.

22. As part of the scheme, "Sonya Corvey" told Victim-4 that she was also working with a lawyer, "David Joel." "Sonya Corvey" told Victim-4 that she and Victim-4 would be together once she received the precious metals.

23. On or about October 30, 2020, Victim-4 wired through Fedwire approximately \$17,000 to a bank account at Bank-3 controlled by Lallande in the name of The Auto Balance Inc. The memo on the wire was listed as "paying back taxes on inheritance." On or about the following dates, Victim-4 made the following wires through Fedwire to the same bank account controlled by Lallande:

- a. On or about November 17, 2020, Victim-4 wired approximately \$44,000 and listed in the memo the wire was "For Auto Purchase";
- b. On or about November 24, 2020, Victim-4 wired approximately \$12,000 and listed in the memo the wire was for "Auto Loan"; and
- c. On or about November 30, 2020, Victim-4 wired approximately \$6,250 and listed in the memo the wire was for "Auto Loan."

24. As part of the scheme, and for the purported benefit of "Sonya Corvey," Victim-4 also made the following wire transfers to Lallande's business bank account in the name of The Auto Balance, Inc. at Bank-2:

- a. On or about May 4, 2021, Victim-4 wired approximately \$105,000; and
- b. On or about May 21, 2021, Victim-4 wired approximately \$90,000.

#### **Victim-5**

25. Victim-5, a resident of Oregon, was also the victim of a romance scam who, as part of the scam, was directed to send checks payable to Lallande's business and also to business bank accounts controlled by Co-Conspirator-2.

26. In or around April 2021, Victim-5 met an individual who purported to be "Brian Glenn" on a dating website for seniors. Victim-5 communicated with "Brian Glenn" via an online encrypted messaging app. "Brian Glenn" repeatedly asked Victim-5 for money to help him travel to the United States to date Victim-5. "Brian Glenn" promised that he would pay Victim-5 back the money she sent on his behalf. "Brian Glenn" sent Victim-5 a purported copy of a bank account that appeared to contain approximately a million dollars as "proof" that he could pay her back for money she sent on his behalf. "Brian

Glenn” directed Victim-5 to send checks for his benefit. In total, Victim-5 sent approximately over \$1.8 million for the benefit of “Brian Glenn.”

27. As part of the romance scam, on or about June 17, 2021, Victim-5 wrote two checks, each in the approximate amount of \$100,000, made payable to two different entities controlled by Co-Conspirator-2.

28. As part of the romance scam, also on or about June 17, 2021, Victim-5 wrote a check in the approximate amount of \$100,000 made payable to The Auto Balance, Inc., Lallande’s company. This check was sent via Fed Ex to Lallande in Florida. On or about June 23, 2021, Co-Conspirator-1 emailed a photograph of the check and the FedEx envelope to Lallande’s email address.

29. On or about July 20, 2021, “Daniella Coney” emailed Lallande an email with the subject “Investors agreement” that contained several form “agreements” with various individuals purporting to agree to remit money to entities controlled by Lallande and Co-Conspirator-1 for the purpose of shipping automobiles. Several of these “agreements” are purportedly signed by Victim-5. A comparison of Victim-5’s actual signature with the purported Victim-5 signatures on the checks made out to the entities controlled by Co-Conspirator-2 and the check Victim-5 allegedly wrote to the Auto Balance, Inc., suggests that they were not signed by the same person.

30. Law enforcement showed Victim-5 a copy of one of the “Investor agreements” described in paragraph 29. Victim-5 confirmed that the letter was fraudulent, that she had never seen the letter, she did not sign the letter, and she did not engage in any investment or agreement with Lallande’s businesses to purchase cars.

### **Additional Information Regarding the Conspiracy**

31. A review of Perra’s bank accounts suggests that he received victim money into his personal bank account and then incorporated Integrity to facilitate larger wire transfers through business bank accounts. A review of Perra’s personal bank account at Bank-1 reflects numerous incoming wire transfers from various individuals to Perra’s account.

32. Integrity was incorporated in Florida on or about November 12, 2019, with Perra as the registered agent. The listed purpose of the corporation was “used vehicle sales and any and all lawful business.” The day after receiving an employer identification number from the Internal Revenue Service, Perra opened up a business bank account for Integrity at Bank-1.

33. In furtherance of the conspiracy, Perra communicated with “Nelson Nyarko” via email about the financial arrangement for Perra providing “Nelson Nyarko” access to Perra’s U.S.-based financial accounts. For example:

- a. On or about April 17, 2019, Perra emailed "Nelson Nyarko" with the subject: "You want to play," in which Perra wrote, in relevant part: "I'll make sure you won't enter the US. Period. I have a life threitning thing going on, and we had a agreement. 10 percent of what hits my acct. And now your not with that. . So be it.. And if the people want there money back so be it. But I will tell them what's really important and going on. And everything in the warehouse will be donated or thrown away."
- b. On or about August 19, 2019, Perra emailed "Nelson Nyarko" with the subject "Payment," in which he wrote: "You Assholes keep shuving money threw my accts, and don't pay me on time, I'll keep taking, as of now I'm owe 10 grand. So keep playing your game and I'll keep taking, or I'll stop right fucking now. Then where are you. Pretty much at stop. So keep your Shit up. If I don't see what I'm owed by Friday of this week, 23 August 2019. at 4pm acct is closed."
- c. On or about February 18, 2020, Perra emailed "Nelson Nyarko" with the subject "fidelity wire instructions," in which Perra admonished: "know [sic] more messing around, i dont want to see medical bills, refrigerators, business help. it has to say cars, orn automobiles, and no more putting me a he company on the edge, because theres some cheap some of bitch, half asses it, there asses are not on the line, but one more time of any crap, its al over..and i mean it, you people can't play by the united states banking rules. then go do something else[.]"

Based on my training and experience, I know that individuals who launder money are often aware that banks routinely monitor wire transfers to determine whether there is suspicious activity in an account that must be reported to U.S. regulators. Based on my training and experience and my familiarity with this investigation, I believe Perra's email described in the preceding subparagraph reflects that Perra knows that the individuals sending money to his account are sending it for purposes other than investing in car sales, and also knows that such transfers, if observed by a bank investigator, will raise suspicion.

34. On or about February 5, 2021, an individual emailed Perra and "Michael Anderson." The email's subject was "REMINDER" and said:

You all are evil evil souls who will be judged by the almighty one day.

You all should be ashamed of all your lies, deceit, and theft!!!!  
Taking advantage of innocent people.

Marlin – you absolutely unequivocally lied to me with details saying that you KNEW Michael Anderson. You didn't confess that you didn't and he was an African until 7 months later !!!!! You and you alone convinced me that he was a REAL person . . . all because YOU wanted a way to make EASY money!!!! SHAME ON YOU!!!!

And whoever "Michael Anderson" is in Africa – you are lower than low in humanity. To SEE and HEAR someone's life falling apart and them hurting because of what YOU rare [sic] doing to them yet you DON'T CARE and CONTINUE to lie and steal from them. You my friend will rot and die the harshest of deaths – God will make certain of that !!!!

A review of the "Michael Anderson" email account reflects a Ghanaian phone number listed on the account and logins to the account from an IP address in Accra, Ghana.

35. During the course of the conspiracy, it appears that Perra conspired with Lallande and introduced Lallande to "Nelson Nyarko" and "Daniella Coney." On or about July 6, 2020, Perra emailed Lallande with the subject "consultant bill," the body of which said "consulting services for business development. 3 months service total. \$5000.00." Thereafter, Lallande and Co-Conspirator-1 communicated with "Nelson Nyarko" and "Daniella Coney" in furtherance of the scheme.

36. According to documents that Lallande and Co-Conspirator-1 provided to Bank-2 in connection with opening business bank accounts, the three business entities controlled by Lallande and Co-Conspirator-1 have largely the same purpose: to buy and sell "junk" cars in Florida, repair them, and resell them.

37. Throughout the course of the conspiracy, Lallande accepted funds into his business bank accounts in a way that was inconsistent with the purported purpose of a car refurbishing business. For example:

- a. On or about May 10, 2021, a personal check written on the account of an individual in Georgia for approximately \$50,000 was deposited into the business bank account of Auto Balance, Inc. The memo listed on the check is not for the purchase of vehicles, but instead is for "HMRC Taxes." I know from my training and experience that "HMRC" is short term for the tax authority of the United Kingdom. I also know from the course of the investigation that several of the fraud schemes under investigation have claimed that taxes or other customs fees from overseas countries were

required to be paid in order to secure an inheritance and/or gold for the perpetrator and/or victim.

- b. On or about July 2, 2021, a personal check written on the account of an individual in Alabama for approximately \$11,500 was deposited into the business bank account of The Auto Balance, Inc. The memo listed on the check is not for the purchase of vehicles, but instead is for "Rick Collins."

38. During the course of the conspiracy, Lallande and his coconspirators created and maintained several different purported "agreements" with various individuals claiming that the individuals were investing in Lallande's businesses to purchase, at Lallande's sole discretion, used automobiles. A review of these agreements suggests that they were created by the same person as opposed to having been actual agreements entered into with investors and/or customers of Lallande.

39. Law enforcement presented several other fraud victims with copies of these "agreements" with Lallande's businesses. Each victim confirmed that they had not, in fact, signed any such agreement, had never seen any such agreement, and were not participating in any investment involving the purchase of used vehicles from Lallande.

40. Interviews with victims who were told to send money to Lallande's business bank accounts have not revealed that *anyone* who sent Lallande's business bank accounts money was provided any sort of return of investment, nor does the review of Lallande's business bank accounts to date suggest that Lallande's business provided an investment return to individuals with whom Lallande maintained "agreements."