
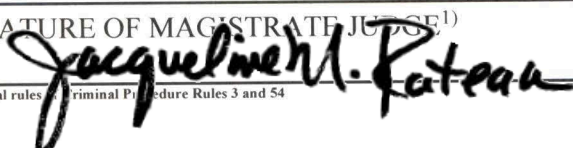


CRIMINAL COMPLAINT- **VICTIM**

United States District Court United States of America v. Rushane Lawrence U.S. Permanent Resident Alien DOB: 1990	DISTRICT of ARIZONA MAGISTRATE'S CASE NO. 21-07088MJ
Complaint for violation of Title 18, United States Code, § 1956	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: From a time unknown and continuing through approximately November, 2019, at or near Tucson, in the District of Arizona and elsewhere, the defendant RUSHANE LAWRENCE, and his fellow co-conspirator(s) knowingly, intentionally combined, confederated and agreed with each other to commit an ongoing Conspiracy to Money Laundering. The co-conspirators to include RUSHANE LAWRENCE knowingly conducted or attempted to conduct financial transactions using the proceeds derived from specified unlawful activities such as Mail and Wire Fraud. As part of, and in furtherance of the conspiracy, RUSHANE LAWRENCE conducted such transactions with knowledge that the proceeds were derived from illegal activity. In furtherance of the conspiracy, RUSHANE LAWRENCE knowingly conducted such transactions in part to disguise the nature, source, location and/or control of such proceeds to further the money laundering scheme, all in violation of Title 18, United States Code, Section 1956.	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: Financial exploitation is a fast-growing form of abuse of seniors and adults with disabilities. Elder Financial exploitation takes many forms. One common scam by strangers is lottery and sweepstakes scams which tell the victim that they have already won but they need to send money to cover their taxes. On August 20, 2018, eighty-eight-year-old victim B.J., resident of the City of Vail, Arizona, reported to the Federal Bureau of Investigation (FBI) Public Access Line (PAL) that she was a victim of a romance scam resulting in a monetary loss of \$800,802. Victim B.J. was being telephonically contacted by a male subject, who used the name, T.S.. T.S. led Victim B.J. to believe she had won a \$5.5 million cashier's check and several other cashier's checks totaling an additional \$800,000. Victim B.J. has since passed away, in November 2019. The investigation revealed that on April 8, 2017, Victim B.J. received an email from T.S. with a subject line "Congratulations" and attachments to include "IRS INFORMATION", "WINNER S DOCUMENT", and "FULL BANK OF AMERICA FAX INFO". This email also contained photographs of a white Mercedes Sports Utility Vehicle (SUV). Based on the appearance of this e-mail, it was sent to further the lottery fraud scheme in order to entice the victim into sending more money.	
CONTINUED on pages 2-3 ATTACHED	
MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE:	
COMPLAINT REVIEWED by AUSA Jonathan B. Granoff <small>JONATHAN B. GRANOFF Digitally signed by JONATHAN B. GRANOFF Date: 2021.02.26 08:30:14 -07'00'</small> <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE & NAME: Federal Bureau of Investigation Special Agent Stacey Gutierrez
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE¹⁾ 	DATE 2/26/2021

¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54

**CRIMINAL COMPLAINT – VICTIM
CONTINUED**

United States of America

vs.

Rushane Lawrence

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED:

A review of Victim B.J.'s financial records revealed the following information. Between December 1, 2015 and January 4, 2019, Victim B.J. wrote checks, or purchased cashier's checks, totaling at least \$447,000 payable to RUSHANE LAWRENCE, S.S., G.C., J.D., W.S., as well as payable to "Cash". During this time period, RUSHANE LAWRENCE and S.S. lived in New York.

It appears that various transfers by Victim B.J., relating to the scheme, occurred through the mail. For example, on or about December 7, 2015, Victim B.J. sent a United States Postal Service certified letter to S.S. at her New York address. The return/receipt for this letter was signed by S.S. Also, on or about May 23, 2017, Victim B.J. sent a United States Postal Service Priority Mail Express mailing to RUSHANE LAWRENCE at his New York address.

Some of the descriptions on the memo line of Victim B.J.'s checks included "taxes for \$950,000", "taxes on acc't", "real estate", and "payment on acc't". The following is a summary of the approximate payments, made by Victim B.J.:

Payee	Count	Amount
G.C.	39	\$219,802
J.D.	25	136,000
RUSHANE LAWRENCE	8	38,500
Cash	4	20,000
W.S.	4	18,500
S.S. (same person as S.S. above)	3	15,000
Grand Total	83	\$447,802

The following is a summary of the deposits received, by RUSHANE LAWRENCE, from various individuals during this same time period, to include the money outlined above received directly from victim B.J.:

Payee	Amount
Victim B.J.	\$38,500
G.C. (same person as G.C. above)	61,400
I.P.	1,800
J.D. (same person as J.D. above)	81,345
W.S. (same person as W.S. above)	13,300
All other sources	19,012
Grand Total	\$215,357

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During the time period December 2014 through June 2019, RUSHANE LAWRENCE conducted cash withdrawals of approximately \$300,000.

On January 31, 2020, R.F., a neighbor of Victim B.J. was interviewed by the FBI. R.F. stated he had installed a recording device on Victim B.J.'s home phone at her request on or about August 2018. R.F. voluntarily provided the FBI access to his Google Drive account, which contained the recordings of calls captured by the recording device. The FBI subsequently conducted a download of the calls on R.F.'s Google Drive account. A review of these recorded calls revealed that on at least one occasion, T.S. instructed Victim B.J. to send monies to the individual identified as G.C. above. Based on the financial analysis, G.C. was identified as one of the money mules receiving monies from Victim B.J. and then sending monies to RUSHANE LAWRENCE and others (refer to above charts). The recorded calls also revealed that T.S. also informed Victim B.J. that he loved her. T.S. further informed Victim B.J. that she would be receiving \$5.5 million and \$550,000 to "reimburse" her for all the money she had paid.

On November 3, 2020, RUSHANE LAWRENCE was interviewed. RUSHANE LAWRENCE admitted to his involvement in a lottery scam involving Victim B.J. RUSHANE LAWRENCE stated he would receive monies either directly from Victim B.J. or indirectly through money mules. Additionally, RUSHANE LAWRENCE admitted to writing at least one letter, addressed from T.S. to Victim B.J. and sending Victim B.J. flowers on seven different occasions. RUSHANE LAWRENCE indicated that he was not the individual making phone contact with Victim B.J.