

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

Case No. 24-60080-CR-DAMIAN

UNITED STATES OF AMERICA

v.

CRISTINE PETITFRERE,

Defendant.

FACTUAL PROFFER

The United States of America and the defendant, Cristine Petitfrere (hereinafter, "Defendant") agree that, were this case to proceed to trial, the United States would prove beyond a reasonable doubt the following facts, among others, which occurred in the Southern District of Florida and elsewhere:

Between approximately December 2019 and continuing through approximately August 2023, the Defendant knowingly and willfully agreed to participate in, and did participate in, a conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h). The Defendant's role in the conspiracy was to supply bank accounts to receive proceeds from romance scams. PETITFRERE then transferred the fraud proceeds to a co-conspirator (hereinafter "Co-conspirator 1"), in exchange for a fee.

PETITFRERE provided bank accounts for romance scam victims to send money to. Her co-conspirators, who handled the victims, gave the victims PETITFRERE's bank account and routing information. Co-conspirator 1 sent PETITFRERE the transaction details for money she would receive from victims. The victims then sent their money to PETITFRERE, who would forward the

funds to Co-conspirator 1 while keeping a portion for herself.

PETITFRERE received and transmitted funds that she knew were the proceeds of criminal activity. Banks notified PETITFRERE on multiple occasions that they suspected fraudulent activity in her accounts, including transactions from victims and to Co-conspirator 1, and closed at least 12 of PETITFRERE's accounts. Still, she continued to open new accounts to facilitate the transfers. Additionally, PETITFRERE received large sums of money from people she did not know. PETITFRERE knowingly lied to banks about her relationship with Co-conspirator 1 and the nature of the funds, at times at the direction of Co-conspirator 1.

For example, on January 11, 2021, PETITFRERE opened a Citibank account ending in 3372, on which she was the sole signatory. On April 30, 2021, PETITFRERE's account ending in 3372 received a \$303,500 wire transfer from Victim Company 1, a business owned by victim T.E. T.E. believed he was sending money to benefit his romance interest "Jackie Turpin." Turpin was in fact a romance scam persona being controlled by a fraudster. On May 5, 2021, from a bank branch located in Miami, Florida, PETITFRERE wired \$288,450 to Co-conspirator 1, keeping \$15,050.00 as a fee. When Citibank contacted PETITFRERE about her receiving wires from Victim Company 1 and sending wires to Co-conspirator 1, PETITFRERE falsely told the bank that T.E. was her partner in the business of building houses in Africa, and that Co-conspirator 1 was PETITFRERE's brother.

PETITFRERE regularly engaged in laundering funds which she knew, and had reason to know, were criminal proceeds. During the conspiracy, PETITFRERE personally laundered at least \$2,716,850.83 of criminal proceeds. In exchange for laundering the funds, PETITFRERE personally received at least approximately \$203,815.59 in fees.


The parties agree that these facts, which do not include all the facts known to the United

States and the Defendant, are sufficient to prove Count 1 of the Indictment.

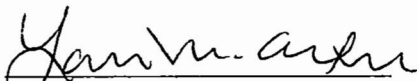
MARKENZY LAPOINTE
UNITED STATES ATTORNEY

AMANDA N. LISKAMM
Director
U.S. Department of Justice
Consumer Protection Branch

Date: 9-11-24

By: 
MATTHEW A. ROBINSON
TRIAL ATTORNEY
U.S. DEPARTMENT OF JUSTICE
CONSUMER PROTECTION BRANCH


Date: 9/11/2024

By: 
LAUREN M. ELFNER
TRIAL ATTORNEY
U.S. DEPARTMENT OF JUSTICE
CONSUMER PROTECTION BRANCH

Date: 9/11/2024

By: 
ALLARI DOMINGUEZ
ATTORNEY FOR DEFENDANT

Date: 9/11/2024

By: 
CRISTINE PETITFRERE
DEFENDANT