

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

UNITED STATES OF AMERICA	)	
	)	No. 3:17-cr-00082-002
v.	)	Hon. Thomas A. Varlan, Chief USDJ
	)	Hon. C. Clifford Shirley, Jr., Chief USMJ
HEATHER ANN TUCCI-JARRAF	)	

**NOTICE OF FILING**

The Defendant **HEATHER ANN TUCCI-JARRAF** hereby files TESTIMONY OF  
PARKER STILL BEFORE THE GRAND JURY.

Respectfully submitted,

s/ Francis L. Lloyd, Jr.  
\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

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s/ Francis L. Lloyd, Jr.  
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T E S T I M O N Y

Of

PARKER STILL

Before the

G R A N D J U R Y

Impaneled February, 2017

And Convened in

THE EASTERN DISTRICT OF TENNESSEE

Meeting in

Grand Jury Room  
Howard H. Baker, Jr. Federal Courthouse  
800 Market Street  
Knoxville, Tennessee

\* \* \* \* \*

Testimony July 18, 2017

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Examination Conducted by:

CYNTHIA DAVIDSON  
Assistant United States Attorney  
800 Market Street  
Knoxville, Tennessee

**ORIGINAL**

KENNEDY REPORTING SERVICES  
205 NORTH 20TH STREET  
SUITE 408  
BIRMINGHAM, ALABAMA 35203

P R O C E E D I N G S

July 18, 2017

2:59 p.m.

PARKER STILL,

a witness of lawful age having sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION BY MS. DAVIDSON:

Q Could you please state and spell your name for the record?

A My name is Parker Still. Last name S-T-I-L-L.

Q And what do you do?

A I'm a Special Agent with the Federal Bureau of Investigation. I'm assigned -- currently assigned to the Knoxville Division.

Q And how long have you done that?

A Approximately five years.

Q And what type of experience did you have prior to being with the FBI?

A Prior to joining the FBI, I was an attorney for approximately seven and a half years. Still licensed to practice law. During my time as an attorney I did both prosecution and I've done criminal defense work.

Also a graduate of the Army JAG School in Charlottesville, Virginia.

Q And do you have a specialization at the FBI?

1 Are you in a squad?

2 Do you investigate a specific type of cases?

3 A Yes, ma'am. I handle primarily white collar  
4 cases involving, you know, bank fraud, wire fraud, mail  
5 fraud, general financial crimes. Of course, we're a small  
6 division. We all kind of have to help, you know, out on  
7 other cases. So I do stuff with the violent crime squad as  
8 well.

9 But, primarily, I'd say 90% of my work is  
10 dedicated to white collar crime.

11 Q And so in -- in your role with the FBI, did you  
12 have an occasion to investigate a scheme to defraud the  
13 USAA?

14 A Yes, ma'am, I did.

15 Q And what is USAA?

16 A Okay. USAA is a -- what I'll -- I'll call it a  
17 -- kind of a multi facet financial institution.

18 It's -- the banking part of USAA is federally  
19 backed by the Federal Deposit Insurance Corporation commonly  
20 referred to as the FDIC. They offer products such as  
21 insurance. I'm sure some of y'all have probably seen the  
22 USAA commercials on TV.

23 They're also involved in real estate and  
24 retirement arenas as well. That's just some of what USAA  
25 does.

1                   And I don't think I said what it was. U -- it's  
2                   United States Automobile Association. And that's -- so when  
3                   I refer to USAA, that's what I'm referring to it as today.

4                   And, again, headquartered or based out of Texas.

5                   Q                   And so tell me about your investigation.

6                                   How did this come to your attention and what did  
7                   you learn?

8                   A                   Well, first let me back up just one second  
9                   there, Ms. Davidson.

10                                  So just kind of you know how investigations come  
11                   to the FBI. We rely a lot, and it's something that people  
12                   don't realize, on citizens just contacting us with various  
13                   financial fraud matters that they might be suspected of.

14                                  We also rely heavily on financial institutions,  
15                   banking officials, those type of individuals to reach out to  
16                   us and provide us information, which is what ultimately  
17                   happened here that the Director for Financial Crimes for  
18                   USAA reached out to us about this situation with Mr. Randall  
19                   Keith Beane.

20                   Q                   And so once you -- what did you learn from this  
21                   transaction with him --

22                   A                   Sure.

23                   Q                   -- or this communication with him?

24                   A                   Yes, ma'am. From this communication, it  
25                   continued and repeated communications with USAA, I have

1 learned that beginning on or about July 5th, 2017 and  
2 continuing through July 11th, 2017, Mr. Beane embarked in a  
3 scheme to defraud USAA.

4 The scheme involved the purchase and attempted  
5 purchase of certificate of deposits that were offered by  
6 USAA through their web site. This is -- so how the scheme  
7 would work would be that Mr. Beane would use a mobile app to  
8 engage the USAA web site. Once he was here he would then go  
9 through a process to purchase a certificate of deposit.

10 From this point he would enter a -- he entered a  
11 routing number, which was a legitimate routing number for  
12 the Federal Reserve Bank.

13 Q And was that routing number, did it end in 1135  
14 -- no, I'm sorry, the wire -- the routing number -- what was  
15 the routing number?

16 A It ended in 1452.

17 Q 1452.

18 A And, again, that was a valid routing number for  
19 the Federal Reserve Bank.

20 And just so you -- again, I apologize, I like to  
21 give a little detail about what that is. The Federal  
22 Reserve Bank is the central bank of the United States. It's  
23 commonly referred to as like the bank of the U. S.  
24 Government.

25 Q And is that located in New York, New York?

1 A Yes, ma'am, it's my understanding. I think they  
2 have several locations, but this one, in particular, is New  
3 York.

4 So he would enter the -- a valid routing number,  
5 but when it came to enter a funding source he entered a  
6 fraudulent account number. And that number was essentially  
7 Mr. Beane's Social Security number with one number altered.

8 Q And we allege that number in the Indictment  
9 multiple places.

10 Is that number ending in 1135?

11 A That is correct, yes, ma'am, 1135.

12 Q And so that was basically his Social Security  
13 number with one number wrong?

14 A That's correct, yes, ma'am.

15 Q And so what did he do?

16 A Well, there were numerous attempts by Mr. Beane  
17 through this scheme. He attempted to obtain, like I said,  
18 numerous CDs.

19 And it's my understanding the way the USAA  
20 system works, that those were funded by USAA, but ultimately  
21 reversed, however, two of these transactions did get  
22 through.

23 Q And what does that mean?

24 A So they were funded. Real money went into --  
25 into this CD, two of them. One for 500,000 and one for

1 999,000. Y'all have to forgive me, I am lawyer, so these  
2 numbers run together.

3 Nine nine nine comma, zero, zero, zero, that's  
4 the -- that's the two CDs that were actually funded, yes,  
5 ma'am.

6 Q And so what appeared once these CDs were funded?

7 A Okay. Once these CDs were funded Mr. Beane then  
8 proceeded to liquidate the CDs, cash them out early,  
9 incurring a penalty for doing so because they were 30-day  
10 CDs.

11 So he incurs a penalty and then takes that --  
12 the money from the CD and moves it into his personal bank  
13 account at USAA.

14 Q And then what did he do with these funds?

15 A The funds were then used for basically personal  
16 expenses. One -- a portion of the funds -- approximate --  
17 the exact number, four nine three one ten sixty-eight,  
18 \$493,110.68, was used to purchase a 2017 Integra Cornerstone  
19 45 foot motor home.

20 And then additional funds from what USAA  
21 provided us were used to pay off -- you know, pay insurance  
22 needs, pay off, you know, USAA credit cards and that type of  
23 stuff within the USAA system, yes, ma'am.

24 Q And what happened to the one, the \$990,000 one?

25 A USAA was able to freeze a significant portion of



1 that. The -- I can give you the exact number if you'll bear  
2 with me one second here.

3 The \$945,250.01 of the nine nine nine and three  
4 zeros was frozen by USAA.

5 Q So did you get some -- did you bring something  
6 with you to help kind of explain how he did this to the  
7 Grand Jury?

8 Are there some documents or some screen shots  
9 that would assist you in your testimony?

10 A Yes, ma'am, there is. There are some documents  
11 that would.

12 Q So where -- what are the documents that I'm  
13 getting to show the Grand Jury?

14 A Okay. These documents, Ms. Davidson, are the --  
15 are basically screen shots. So what would these documents  
16 would be are what Mr. Beane was looking at when he created  
17 this -- this CD.

18 Q And so all of this was done on an iPhone app; is  
19 that correct?

20 A It was done on a -- right, an application, an  
21 app, yes, ma'am.

22 Q So you were saying these were basically screen  
23 shots?

24 A Right.

25 Q Where did you get these?

1           A           These were provided to us by USAA. And it's my  
2 understanding these were -- so what USAA does, they have a  
3 data base, right, where they're able to -- when someone has  
4 a -- has a session, they log in, they have a session.  
5 They're able to essentially save that within their data base  
6 for an amount of -- for a number of days.

7                   And in cases like this where we have fraudulent  
8 activity they're able -- we're able to reach out to them and  
9 they're able to provide us exactly what the member, in this  
10 case, Mr. Beane, would have been looking at when this  
11 transaction took place.

12          Q           So let me show you page number 1.

13          A           So this --

14          Q           What is this?

15          A           So this is my understanding from USAA, this is  
16 what Mr. Beane would be looking at initially. You'll see at  
17 the top, it says open a bank account. And this will be kind  
18 of the page where you take your first step of action in this  
19 type of scheme.

20          Q           And was Mr. Beane a member of USAA?

21          A           He was. It's been confirmed through USAA that  
22 Mr. Beane was, in fact, a member.

23          Q           And did he have multiple accounts?

24          A           He did.

25          Q           And so do you know exactly when he became a

1 member of USAA?

2 A I believe it's in May of 2016 is the member  
3 date.

4 Q So you have to be a member of USAA to -- to do  
5 these transactions?

6 A Yes, ma'am, that's my understanding.

7 Q So this is the first.

8 Is there anything else that you'd like to point  
9 out to the Grand Jury about this?

10 A Not really. Just notice the USAA symbols on  
11 here and then, of course, the open the bank account at the  
12 top.

13 Q And then page 2.

14 A Okay. Page 2 is -- it's kind of difficult to  
15 read there. I can see there where it says -- I think it  
16 says account type. There it is. So you'll see it's account  
17 type is a certificate of deposit.

18 Q So you're -- si this is just the next screen you  
19 would see?

20 A Right. And you'll see on the bottom there it  
21 says, you know, do you want to add an account holder. You  
22 can check that box if you wanted to.

23 But, yeah, so that's what they're going to do.  
24 It's going to be a certificate of deposit.

25 Q And then is page 3 of what you're providing?

1 A Right, yes, ma'am. This is -- all right. So  
2 there you've got Mr. Beane identify himself, Randall Keith  
3 Beane. Provide a mailing address, physical address and an  
4 e-mail address all -- and, you know, identifiers for Mr.  
5 Beane there.

6 THE WITNESS: Wasn't it Ricky on one of the  
7 forms?

8 Q (By Ms. Davidson) No, Ricky -- do you know who  
9 Ricky is?

10 A Sir, it's my understanding, again, provided --  
11 information provided to me by USAA that that is possibly his  
12 brother --

13 THE JUROR: Okay.

14 THE WITNESS: -- Mr. Beane's brother.

15 THE JUROR: So it's somebody else, okay.

16 THE WITNESS: Yes, sir.

17 Q (By Ms. Davidson) So tell me if I am correct,  
18 but -- and to your understanding, he could make this account  
19 out to someone who was also on the account with him, like in  
20 this case, Ricky E. Beane, is that --

21 A That's my understanding of how it works.

22 Q But he didn't have to and here is not checked?

23 A That's correct. I don't see it checked there.

24 Q Did we already do page 3?

25 A Yes, ma'am.

1 Q Page 4?

2 A Okay. Page 4, if you'll see right there you --  
3 this is a -- it tells you what kind of CD do you need,  
4 fixed, adjustable, variable rate.

5 There's information about interest being paid.

6 And you'll see at the bottom it says, (Reading)  
7 Deliver all certificates of deposits online.

8 So this is an important page right here because  
9 it tells the account features. Ladies and gentlemen -- so  
10 I'm looking at the top. You've heard me talk a little bit  
11 about this was a fixed CD.

12 It -- the box checked super because of the  
13 dollar amount.

14 You'll see also it's a one-month term CD there.

15 So that's -- that's -- and then you'll see just  
16 how you want the interest to be paid, add it to the balance  
17 monthly.

18 So this is where you find it; right?

19 Q Page 6?

20 A Yes, ma'am.

21 So this is, again, make your initial deposit.

22 It says from checking or savings account. Where, it's my  
23 understanding from this, if you had a USAA account that you  
24 wanted to put money in there from, and if you had another  
25 account with them, you could put that money in at this -- at

1 this stage right here, but that's not what happened.

2 Q And so it shows use another account?

3 A Right.

4 Q So did Mr. Beane click on use another account?

5 A That's my understanding, yes, ma'am, he would  
6 have clicked on that.

7 Q And then here you put the initial deposit, which  
8 he would put the amount in?

9 A Right. And I think it's reflected later on,  
10 yes, ma'am.

11 Q And then go to page --

12 A Okay. So, Ms. Davidson, if we could just zoom  
13 in on that top a little bit. So let's go through this one.  
14 It kind of summarizes.

15 So we've got a certificate of deposit.

16 We have the primary account holder as Randall  
17 Keith Beane.

18 The additional account holder is Ricky E. Beane.

19 The account features you see there as a fixed  
20 super CD. All the stuff we've been through about the  
21 one-month term.

22 And then most importantly the initial deposit.  
23 You'll see this one for \$999,000. Funds transferred from a  
24 non-USAA account.

25 And then when I was talking about, right, here

1 is it, the routing number to the Federal Reserve Bank in New  
2 York was previously referenced, and the account number, Mr.  
3 Beane's Social Security number minus one -- with one number  
4 changed on there.

5 Q And so this routing number -- that is the  
6 routing number, the actual routing number to the Federal  
7 Reserve Bank?

8 A That is my understanding, yes, ma'am.

9 Q And that is -- this number is the fake account  
10 number; right?

11 A Right, yes, ma'am.

12 Q Which is Mr. Beane's Social Security number  
13 minus one digit?

14 A Yes, ma'am.

15 A JUROR: Is that suppose to be the account  
16 number for the USAA, the account that he owns?

17 MS. DAVIDSON: No. This right here -- and  
18 correct me if I'm -- this is what he's purchasing the CD  
19 with.

20 And so when he clicked on, remember from the  
21 other page, he clicked on use another account.

22 THE JUROR: Okay.

23 MS. DAVIDSON: So this is not a USAA account.  
24 He's basically paying for this with Federal Reserve  
25 accounts.

1 THE JUROR: Okay.

2 Q (By Ms. Davidson) See --

3 A Yes, ma'am. So that's the scheme.

4 Q -- is that right?

5 A That's the scheme, right.

6 A JUROR: I've got a question.

7 How can he buy a CD -- I mean, wouldn't they  
8 verify his account before they put the money in the CD?

9 THE WITNESS: Yes, sir. And I can kind of go  
10 into that.

11 So just for everyone's benefit the question that  
12 was asked to me was, wouldn't they verify the funds before  
13 it went to a CD, which is a good question, and, yes, the  
14 answer is generally that is how it is done.

15 However, in this case, it was very similar to --  
16 the best way I can describe it would be a bad check that  
17 essentially USAA populated, you know, in this case the  
18 999,000, USAA -- he puts this information in, USAA funds it  
19 as in my mind I'm thinking as if somebody presented a bad  
20 check to USAA the funds go into the account.

21 Once USAA realizes -- once they get a notice  
22 back that these -- it's not a valid account number, USAA  
23 reverses the transaction, however, the funds have already  
24 been withdrawn.

25 Does that make sense, sir?



1 THE JUROR: You'd think the computer would kick  
2 it out?

3 THE WITNESS: Yes, sir, you'd hope so.  
4 Yes, ma'am.

5 A JUROR: I worked years ago, back in the early  
6 '70's, at a bank in Los Angeles --

7 THE WITNESS: Yes, ma'am.

8 THE JUROR: -- and quite frequently some of our  
9 large union trust funds would buy CD -- these short terms  
10 CDs for quick turnover and generation of money.

11 They never would turn a CD loose until the money  
12 had been officially transferred.

13 THE WITNESS: Yes, ma'am.

14 MS. DAVIDSON: Well, that's obviously best  
15 practices. But, in this case, USAA turned over the money.

16 THE JUROR: In other words, they get stuck?

17 MS. DAVIDSON: Well, that's not for us to  
18 determine.

19 USAA turned over the money.

20 A JUROR: Yeah. But it was fraudulently  
21 obtained is what it amounts to.

22 MS. DAVIDSON: Yes.

23 A JUROR: But the routing number actually is  
24 from the Federal Reserve --

25 MS. DAVIDSON: Yes.

1 THE JUROR: -- and that may have had something  
2 to do -- did -- did -- could that have had something to do  
3 with USAA's thinking, you know, this is a transfer from a  
4 Federal -- from a Federal Reserve account?

5 Is that part of the scheme or --

6 THE WITNESS: I'm just -- I'm not real sure,  
7 sir. I mean, if -- what -- you know, what USAA's thinking  
8 was or -- I'm sorry --

9 THE JUROR: I mean, I --

10 THE WITNESS: -- if -- can you ask it a  
11 different -- okay.

12 THE JUROR: This -- this was not a transfer from  
13 a bank with a specific routing number, this was a transfer  
14 from a Federal Reserve account, a Federal Reserve bank  
15 account.

16 THE WITNESS: Yes, sir.

17 THE JUROR: I can't -- I don't think I can have  
18 a Federal Reserve bank account, can I?

19 THE WITNESS: Yes, sir. I wouldn't -- I mean, I  
20 don't want to speculate about what you could or could not  
21 have.

22 But I would answer that it is my belief that the  
23 Federal Reserve target -- was targeted as part of this  
24 scheme knowing what we know about individuals like Mr. Beane  
25 and these type of activities, yes, sir.

1 Q (By Ms. Davidson) And so let's talk -- how --  
2 tell me about the motor home.

3 A The motor home is -- as we previously -- as we  
4 just discussed, we see a transaction of funds of \$493,110.68  
5 being wired from USAA to Whitney Bank, another FDI insured  
6 financial institution located -- primarily based in  
7 Louisiana. And, again, this was for Mr. Beane's purchase of  
8 this motor home.

9 Mr. Beane -- this was at Buddy Gregg here in  
10 Knoxville. Mr. Green -- Mr. Beane was actually arrested by  
11 us while in the vehicle in the driver's seat with the engine  
12 running about to -- you know, about to take off.

13 And so that's -- that is -- that is where the  
14 bulk of the funds went on this case was for that purchase.

15 Q And so tell me about why Whitney Bank and Buddy  
16 Gregg took this money.

17 A Okay.

18 Q Did they -- did they ask questions about why  
19 somebody is paying \$99,000 in cash for a -- a motor home  
20 or --

21 A Yes, ma'am. They -- let me -- let me back up  
22 just a little bit there.

23 It didn't take long for USAA to realize what had  
24 happened; right?

25 I mean, you know, this -- this type of money --

1 these are -- these are good investigators at USAA. So they  
2 do, they reach out to -- it's my understanding that they  
3 reached out to Buddy Gregg and to Whitney Bank in order to  
4 -- to, you know, basically let them know that this money is  
5 potentially fraudulently acquired.

6 So this is where we see the introduction of a  
7 lady named Heather Ann Tucci, T-U-C-C-I, last name Jarraf,  
8 J-A-R-R-A-F. And this is where we first see her come into --  
9 come into play.

10 And the reason we know about this is because of  
11 recordings have been posted online that we've required and  
12 listened -- you know, various of us have listened to some or  
13 part of all of these. I know I've listened to part of them  
14 or the relevant stuff here. The --

15 Q And who put these recordings online?

16 A You know, I'd be speculating as to that to say  
17 exactly who put those online. You know, I think -- I'd just  
18 know I'd just be speculating to put those online.

19 But what happened is -- so these -- this is --  
20 what is -- what happened is an interview or a meeting takes  
21 place at Buddy Gregg. We've been able to verify  
22 participants at this meeting where individuals, salesmen and  
23 another individual, Buddy Gregg.

24 Mr. Beane is present in the room as identified.

25 And we also hear a lady by the -- Ms. -- Ms.

1 Jarraf identify herself on the phone.

2 And what -- what she does, she holds herself out  
3 as an attorney representing Mr. Beane and Mr. Beane's trust.

4 And I want to make the -- I want to make the  
5 Grand Jury aware that she -- she -- apparently she is an  
6 attorney. She's not licensed in the state of -- not  
7 currently licensed in the state of Washington where she, at  
8 one time, was licensed. And she's not licensed in the state  
9 of Tennessee based on our research.

10 So what she does here is she makes  
11 representations that she is -- she's representing Beane,  
12 that these funds belong to Mr. Beane. She -- she repeatedly  
13 confirms -- Mr. Beane is asked by her to confirm that these  
14 are your funds in front of everybody.

15 She suggests two things. She suggests -- she's  
16 throwing out issues that may be here. She says, "Well,  
17 maybe there's a problem with USAA. Maybe there's a problem  
18 with the source funding of the bank."

19 So it's my -- from listening to this recording I  
20 feel that she -- well, just to summarize it as saying, it  
21 was an attempt by her to convince Buddy Gregg and also later  
22 in the call a representative from Whitney Bank.

23 Remember Whitney is the one -- is the bank who  
24 received the funds, to convince them that the funds belonged  
25 to Mr. Beane and the transaction should go through.

1 Q And since Mr. Beane was arrested by the FBI; is  
2 that correct?

3 A He was arrested. Just to clarify, he was  
4 arrested by us on -- he had an outstanding warrant on a  
5 state charge.

6 Q And since that arrest have -- has Ms.  
7 Tucci-Jarraf or however you say her name, have things been  
8 posted online regarding that?

9 A Yes, ma'am. We've seen a video now, a video and  
10 audio where she explains about Mr. Beane obtaining CDs,  
11 cashing them out early, which I would say to the Grand Jury  
12 that that shows knowledge.

13 Q Yes.

14 A And she admits to following along to make sure  
15 everything is running well and preparing legal documents.

16 She stated that the coach deal, I say -- when  
17 she says coach deal, I take that to mean the motor coach  
18 purchased from Buddy Gregg was successful and homes were  
19 going to be next.

20 Based on my investigative experience that, to me  
21 means that, they had success on this type of transaction.  
22 They were going to try to do something with real property  
23 next.

24 She stated in there that Beane wanted to test  
25 the scheme out and see what the road bumps were and find

1 solutions to those.

2 That was, in part, just a summary of -- of this  
3 -- of this recording that we see, yes, ma'am.

4 Q And so what do -- do you know what the web site  
5 was that all this stuff was posted on?

6 A I do, ma'am. I may have to --

7 Q I don't know that it's relevant. I just --

8 A Yeah. I can get for that the Grand Jury if --  
9 if necessary.

10 A JUROR: It does seem strange that they would  
11 put it online --

12 THE WITNESS: Yes, ma'am.

13 THE JUROR: -- to where it would be accessible  
14 by --

15 Q (By Ms. Davidson) Well, do you know whether or  
16 not this scheme such as this has been online?

17 A Yeah. There has been -- not this exact scheme,  
18 but there has been videos published out, one in particular,  
19 that we've -- we have knowledge about that describes a  
20 scheme very similar to this. I think it's something phrased  
21 like, "Learn how to pay your bills." It's -- it's  
22 definitely a -- out there, a scheme similar to this.

23 Q Is there a -- oh, I found it, it's in my pros  
24 memo.

25 A I provided -- I knew I -- I-UV.

1 Q This is a --

2 A The -- the -- most of the -- we see it at a web  
3 site I-UV.com is where -- is where we see -- was where that  
4 video was -- was on.

5 It's my understanding, from our cyber guys, too,  
6 that maybe -- again, I'm not an expert in this field, but it  
7 could have been on YouTube. I'm not sure about that, but it  
8 could have also been on some of that.

9 But I-UV -- I-UV.com is where, you know, we all  
10 seen it.

11 A JUROR: What does that mean, I-UV?

12 THE WITNESS: I don't know, ma'am, I'm sorry.  
13 I-UV.com, I-UV.com.

14 Q (By Ms. Davidson) And so in -- is she on a  
15 video on this web site explaining everything?

16 A Yes, ma'am. The -- the -- she is on the video.  
17 And it has -- and, actually, at the bottom left on the  
18 screen is -- it has her initials. Like there's a couple of  
19 people on this video. It's kind of like a webcast almost is  
20 how I would describe it. And on the bottom of it, it has  
21 her initials on it if I remember right down at the bottom  
22 left.

23 Q And so she -- so there's an audio, which you've  
24 listened to, of her?

25 A There's an audio out there at the -- at the



1 dealership that's -- that we've obtained offline.

2 And then there's a second video that -- where --  
3 where she, you know, explains kind of what I said earlier  
4 about how Mr. Beane obtained the CDs and cashed them out  
5 early.

6 Q And on this web site are there, in fact, like  
7 the bill of sale from the motor home and other things such  
8 as that?

9 A I have seen that. I can't recall if it's this  
10 specific web site, but posted it online where -- it appears  
11 to me, again, based on my investigative experience, that  
12 this -- these documents were posted online in an effort to  
13 show, look, he really did own this, you're wrong government  
14 essentially.

15 A JUROR: So to clarify, do you think those  
16 postings are directed towards the government?

17 THE WITNESS: If I may, my name has been put out  
18 on -- on, you know, for public -- in public forum by -- by  
19 some individuals, you know.

20 We would refer -- we would refer to it as -- I  
21 think our cyber guys said they may be trying to dox me,  
22 which we would refer to that as any information that's  
23 available, you know, about me online, they would try to put  
24 it out in the public forum. Again, that's my understanding,  
25 yes, sir.

1                   So I -- so to answer your question, yes, I would  
2 think that.

3           Q           (By Ms. Davidson) But did they -- did -- does  
4 she describe the purchase of the CD with the Federal Reserve  
5 routing number?

6           A           She -- she -- I'll -- I'll remember from the  
7 video. Actually have -- I have it with me.

8                   The -- the -- she does talk about that --  
9 explain how Mr. Beane obtained the CDs and cashed them out  
10 early.

11                   Now, specifically, on the federal routing number  
12 I cannot recall if she says that specifically.

13           Q           And so based on everything you just told me  
14 about, is there evidence that Beane and Tucci-Jarraf  
15 knowingly conspired, confederated and agreed with each other  
16 to commit money laundering?

17           A           Yes, ma'am, there is.

18           Q           So when you look at the timing of all this, this  
19 is what's amazing to me this -- the -- basically the minute  
20 the CD is funded he transfers it to Whitney Bank, I mean,  
21 you know, within a day or so?

22           A           Within a day or so, yes, ma'am. It is not --  
23 the money does not stay long, which is -- which is  
24 characteristic of money laundering.

25                   Obviously if you leave it in the bank what

1 happens with his -- the larger sum, the approximately 945  
2 figure I gave you earlier, the bank will catch on and grab  
3 the money back.

4 In this case, though, he pulled out a  
5 significant portion and bought the motor home with it.

6 Q And so did you learn from any representatives of  
7 either Buddy Gregg or Whitney Bank that they spoke to an  
8 attorney regarding these funds?

9 A This morning one of our investigators -- I --  
10 again, I believe did confirm that -- that the two -- the  
11 individuals we heard on the audio were Buddy Gregg  
12 employees. Now, whether he confirmed that they spoke to an  
13 attorney I don't know, but I -- you know, we have that  
14 audio. And it's -- it's clearly available.

15 Q And so the money transferred to Whitney Bank.  
16 And was it -- represents proceeds of some form  
17 of unlawful activity?

18 A It is. It's representative of wire fraud and  
19 bank fraud, which is what happened here.

20 And, like I said previously, this is -- this is  
21 something we see commonly that bad guys, what they do, they  
22 purchase things, they hide money, they try to conceal it.

23 And, yes, wire fraud and -- wire fraud and bank  
24 fraud are two -- are two common charges that we see  
25 associated with money laundering activities because you've

1 got to do something with it.

2 Q So I'm going to go specifically through the  
3 counts --

4 A Okay.

5 Q -- to make sure that we -- I'm sorry -- okay?  
6 Count 1, and I think you've gone through the  
7 scheme?

8 A Right.

9 Q On July 6th, 2017, Beane transferred funds he  
10 did not own via wire using Federal Reserve routing number  
11 1452 and fictitious account number ending in 1135 to  
12 purchase CD number 4613 in the amount of \$500,000?

13 A Yes, ma'am, on or about that date, absolutely.

14 Q And so tell me about the -- explain the wire.

15 A So the -- so what we see here is the funds were  
16 -- you know, when we generally see wire fraud transactions,  
17 you know, money had to be -- it use to be a lot of times  
18 we'd see paper checks, right, paper check to somebody, but  
19 also what -- within the -- which in the financial  
20 institutions wires are commonly used.

21 So, you know, from one account there's one --  
22 you've got a funding source and an account -- or you can --  
23 you know -- and so the funding source is here and then puts  
24 the money in the account here through an electronic process  
25 commonly referred to as a wire transfer.

1 Q And did these wires transmissions go through --  
2 one of the -- one was fed AC --

3 A Some -- some were -- some were ACH -- most all  
4 of these were what we refer to as the automated  
5 clearinghouse, ACH transfers. And then I -- my  
6 understanding that one was through fed wire.

7 Q And what is that?

8 A Let me give you -- I can give you a little  
9 better explanation. The -- so let's just talk about an ACH.  
10 That's the -- like I said, it's an automated clearinghouse.  
11 And it's essentially a network for financial institutions.

12 Again, it kind of goes back to my check. You  
13 know, we're not using checks so much anymore, we're using  
14 one financial institution talking to another financial  
15 institution through this automated clearinghouse.

16 So what you have, you have an originator that,  
17 you know, you can have a direct deposit or a direct payment.  
18 And then that's entered electronically and goes to another,  
19 you know, financial institution.

20 So that -- and a fed wire works very similar to  
21 the -- to the same -- in this case I'm using fed wire. You  
22 originate funds by instructing a Federal Reserve Bank to  
23 debit funds from its own account and credit funds to another  
24 participant. So just we're talking wire transfers, yes,  
25 ma'am.

1 Q And so this -- he used in Count 1, he uses an  
2 iPhone app to commit a wire transmission.

3 And was that a signal in interstate commerce?

4 A Yeah. It would be a mobile app. So, yes,  
5 ma'am.

6 Q I keep saying iPhone app.

7 Was it an iPhone app?

8 A It was. It was a mobile app, yes, ma'am. It  
9 could be an iPhone or -- yes.

10 Q It was an i -- what -- when you say iPhone, it  
11 could be used either on an iPhone or --

12 A Or an iPad, right --

13 Q -- iPad?

14 A -- I'm not good at that stuff, but, yeah. On  
15 those electronics y'all are probably -- yeah, it was an app.

16 Q So it was an app that was on some sort of mobile  
17 device?

18 A Yes, ma'am. That is information as provided to  
19 us by USAA.

20 Q And they can tell that by looking at their  
21 records --

22 A Right.

23 Q -- that it was done through the -- through an  
24 app?

25 A Undoubtedly, yes, ma'am.

1 Q And so this iPhone app did a wire transmission.

2 And was that signal in interstate commerce?

3 A Yes, ma'am.

4 Q And based on that he put in this routing number  
5 and this account number to purchase a CD in the amount of  
6 \$500,000?

7 A Yes, ma'am.

8 Q And that happened on 7-6-2017?

9 A Yes, ma'am. It's my understanding he -- some of  
10 these were initiated on 7-5, actually went through on 7-6,  
11 yes, ma'am.

12 Q And so -- and where does Randall Keith Beane  
13 reside?

14 A Randall Keith Beane resides in Knoxville,  
15 Tennessee, yes, ma'am.

16 Q And let's talk about Count 2.

17 The CD number --

18 A And, Ms. Davidson, again, USAA is based out of  
19 Texas.

20 Q Texas?

21 A Yes, ma'am.

22 Q And let's talk about Count 2.

23 What happened in Count 2, which is on 7-6-2017?

24 A Okay. That is -- so then you're seeing CD  
25 number was closed and the funds, that's the 499,909.55 -- 59

1 cents was transferred to Beane's personal account at USAA.  
2 Again, would have been initiated by Beane. And that is the  
3 CD being liquidated minus the fee for the early liquidation  
4 fee and transferred to a personal bank account.

5 Q And so did -- that wire transmission, was it a  
6 signal in interstate commerce?

7 A Yes, ma'am.

8 Q And was this wire transmission in furtherance of  
9 the fraud?

10 A Yes, ma'am.

11 Q So that is the end of what he basically  
12 transfers his -- the 49 -- I mean, 499,909.59 to his own  
13 account?

14 A Yes, ma'am.

15 Q And so do you know what -- why some of the money  
16 is missing?

17 A Yes, ma'am. It's my understanding that that  
18 would be an early liquidation fee because it was the 30-day  
19 fixed CD.

20 Q And then Count 3 on the same day?

21 A Yes, ma'am, the same thing. This is the  
22 \$999,000 CD very similar to the \$500,000 CD that was funded.

23 Q And so he did this with the app?

24 A Yes, ma'am.

25 Q And with the app he used the routing number



1 ending in 1452?

2 A Yes, ma'am.

3 Q And the fictitious account number 1135?

4 A Yes, ma'am.

5 Q And then the CD was funded in the amount of nine  
6 million nine -- I mean, sorry, is that right?

7 No.

8 \$999,000?

9 A That's correct.

10 Q And back to it.

11 Did -- this transaction, was it a wire  
12 transmission of a signal in interstate commerce?

13 A Yes, ma'am.

14 Q And was this transmission in furtherance of the  
15 fraud?

16 A Yes, ma'am.

17 Q Count 4 also on the same day, 7-6-2017, CD  
18 number 4623 in the amount of \$999,000 was closed and funds  
19 in the amount of \$998,819 -- eight hundred and nineteen  
20 dollars and thirty-six cents were transferred via wire to  
21 one of Beane's personal bank accounts, a number ending in  
22 3062?

23 A That's correct, yes, ma'am.

24 Q Now, I'll ask you again: Was -- did he conduct  
25 this transaction on an app --

1 A Yes, ma'am.

2 Q -- with a wire transmission?

3 A Yes, ma'am.

4 Q And was it a signal that affected interstate  
5 commerce?

6 A Yes, ma'am.

7 Q And was this transaction in furtherance of the  
8 fraud?

9 A Yes, ma'am.

10 Q On to the next day, July 7th, 2017, Count 5.

11 Beane transferred \$493,110.68 via wire from his  
12 personal account number 4026 and to Whitney Bank, account  
13 number 4960.

14 And this account number belonged to Buddy Gregg;  
15 is that correct?

16 A Yes, ma'am, that's correct.

17 Q For the purchase of a 2017 Integra Cornerstone  
18 45B 45 month -- 45 foot diesel motor home?

19 A Yes, ma'am.

20 Q So tell me about that transaction.

21 A This was the transaction where the motor home  
22 was purchased. So Mr. Beane would have authorized the wire  
23 to be sent up from his USAA account to the Whitney -- to  
24 Whitney Bank for the -- for the purchase of that motor home.  
25 And this would be essentially a money laundering transaction

1 as well.

2 Q And so was this done via a wire transmission?

3 A Right, yes, ma'am.

4 Q And was it -- was wire this transmission a  
5 signal in interstate commerce?

6 A It was, yes, ma'am.

7 Q And was this transmission in furtherance of the  
8 fraud?

9 A It was. In fact, this one, ma'am, it's my  
10 understanding, was the use of the fed wire transfer.

11 Q The fed wire transfer?

12 A Uh-huh (affirmative response).

13 Q And so what is the timing of all -- what is the  
14 fact that it's the very next day tell you?

15 A Right. You'll notice the timing is all from --  
16 it's a two-day span from July 5th to July 7th. And that  
17 tells me that Mr. Beane would know that this money is not  
18 rightfully his and has to be moved out of this account.  
19 That would be --

20 Q Basically immediately?

21 A Immediately, yes, ma'am.

22 Q And so --

23 A JUROR: There are two different personal  
24 account numbers there from 3062 to 4026, was this the  
25 accounts?

1 A JUROR: Look at Count 2 and see if that says  
2 4026?

3 MS. DAVIDSON: It does.

4 THE JUROR: So he put the \$500,000 in one  
5 account and then nine hundred --

6 MS. DAVIDSON: See, he puts the -- if you notice  
7 the -- yeah --

8 THE JUROR: Puts all of the money in 3062 and  
9 then takes the money out of 4062?

10 MS. DAVIDSON: Yeah, he must have transferred --

11 Q (By Ms. Davidson) He had multiple accounts at  
12 USAA, didn't he?

13 A Yes, ma'am.

14 THE JUROR: Then you need to add them to -- you  
15 need to add the transfer from the 3062 account to the 4026  
16 account?

17 MS. DAVIDSON: Well, they were within his own  
18 accounts. And so I didn't really see -- nobody -- because  
19 he had multiple accounts at USAA. And so when he's just  
20 transferring one from one account to the other --

21 THE JUROR: But I don't know that he didn't have  
22 a half a million dollars in his 4026 account to start with?

23 If he had a half a million dollars in his 4026  
24 account to begin with, didn't use the money that he had  
25 attained through the other wire transfer, then that's a

1 legitimate thing. That's -- the last one is a legitimate  
2 transfer.

3 THE WITNESS: I'm not --

4 MS. DAVIDSON: Again -- I mean, I don't know how  
5 you could to say that when it -- you know, the money is  
6 gone, you know the 500,000.

7 Q (By Ms. Davidson) Did -- is it your  
8 understanding that he had \$500,000 in any account at USAA  
9 that was a valid \$500,000?

10 A No, that's not my understanding. In fact,  
11 that's -- would be contrary to what USAA has -- has  
12 explained to us through their investigation.

13 THE JUROR: I understand that, what you're  
14 saying, but, you know, unless you -- unless you somehow show  
15 me that the money went from the 3602 account to the 4026  
16 account I don't know that.

17 MS. DAVIDSON: Well, you just had under oath  
18 testimony that he did not have \$500,000.

19 THE WITNESS: And I have records, I'm happy to  
20 show. I have records.

21 I -- I don't -- I don't know, but I'll have to  
22 check that and see. But, I mean, I do have -- I brought  
23 USAA bank records with me and take a break.

24 Q (By Ms. Davidson) Well, did USAA -- well, they  
25 took all the money they could get from it in order to try to

1 recapture this money, did they not?

2 A That's my understanding that they reached out  
3 and grabbed that.

4 And I can see -- I have a transaction sheet in  
5 here I can -- I can -- I'm happy to pull it out and very  
6 simply and show everyone. It would be no problem, it's on  
7 the top. I'm happy to do that and put it on the board.

8 Q Well, we can take a break here in a minute and  
9 we might --

10 A Sure. I'd be happy to.

11 Q And, you know, just for future reference. I  
12 don't have to charge everything that I know is criminal. I  
13 just charge -- you know, it's a prosecution decision. You  
14 just charge what you think is most relevant.

15 Because, I mean, as he testified to there's  
16 actually a total of 31 CDs that he purchased that he -- he  
17 wasn't able to cash any of those. So I didn't charge them.

18 So are you following me?

19 Not everything that is known is charged in this  
20 Indictment.

21 THE JUROR: Sure.

22 Q (By Ms. Davidson) So in regard to Count 5.  
23 Let's see.

24 It went from account number 4026 to 4960; right?

25 A That's correct, yes, ma'am.

1 Q And is that 4026, was that a personal account at  
2 USAA that Beane had an access to?

3 A That's my understanding, yes, ma'am.

4 Q And was the money in that from the \$500,000 CD?

5 A That is what has been relayed to me by USAA,  
6 yes, ma'am.

7 Q And so then he transferred the money to Whitney  
8 Bank on the next day?

9 A Yes, ma'am.

10 Q So with regard to the bank fraud, we've -- we've  
11 pretty much laid that all out. And I think we've pretty  
12 much laid out all of the money laundering.

13 And the money laundering was basically the Count  
14 5, transferred to Whitney Bank for purchase of the motor  
15 home?

16 A Yes, ma'am.

17 Q Did the Defendant -- did the Defendant, Randall  
18 Keith Beane, hold an account ending in the number 1135 at  
19 the Federal Reserve Bank?

20 A No, ma'am, he did not.

21 Q Did he obtain from others, known and unknown to  
22 the Grand Jury, a valid routing number in the Federal  
23 Reserve Bank ending in 1452?

24 A Yes, ma'am, that was what was used.

25 Q And he used his mobile device to access his USAA

1 account?

2 A Yes, ma'am, explained to me by USAA.

3 Q And as we were talking about earlier, the vast  
4 majority of the CDs, and we were looking at that -- this  
5 right before Grand Jury, there was 31 CDs, but the vast  
6 majority of these were returned as invalids because there  
7 was no valid account number; is that correct?

8 A Right. They were essentially reversed by USAA,  
9 yes, ma'am.

10 Q But two CDS were funded by USAA bank and  
11 liquidated by the Defendant?

12 A Yes, ma'am.

13 Q And he was able to take out the money -- put the  
14 money in his own personal account before USAA could reserve  
15 the transaction?

16 A Yes, ma'am.

17 Q And as we were talking about, he did use these  
18 funds acquired from the CD to purchase for his own personal  
19 benefit the purchase of 217 -- I mean, I'm sorry, a 2017  
20 Integra Cornerstone 45B 45 foot diesel motor home?

21 A Right, yes, ma'am.

22 MS. DAVIDSON: And let's take a five minute  
23 break for him to look at the records.

24 THE WITNESS: Yeah, I'm happy to pull those.

25 MS. DAVIDSON: Did y'all want to take a break or



1 do you want us to just step out.

2 A JUROR: I've got one question.

3 In other words, he opened these CDs with ghost  
4 funds and then he got real funds.

5 And based on memory there was about \$40,000 that  
6 they didn't recover; is that right?

7 MS. DAVIDSON: No. There was about -- I think  
8 it's closer to the amount of the five -- it's more than  
9 500,000.

10 THE JUROR: Oh, yeah, but I mean --

11 MS. DAVIDSON: Because all of the money that  
12 went to Whitney Bank for the motor home is gone?

13 THE JUROR: Right, right.

14 MS. DAVIDSON: Because that was a, you know, a  
15 bona fide purchaser.

16 THE WITNESS: I think it will be a big benefit  
17 to show this, this full transaction sheet that's been  
18 provided to me by USAA for the benefit. You can see -- it's  
19 just easy to see the money coming in and how it went right  
20 out. I think it would be a benefit to answer your question,  
21 sir, and anybody else's. Just give me one second.

22 MS. DAVIDSON: So they have lost over 500,000.

23 If you'll look at the forfeiture allegations the  
24 thing that -- this is where we get the amount that we're  
25 seeking in money judgment. It's \$553,749.99 is the total

1       loss to -- now, I think that they may be able to -- he paid  
2       USAA, as I understand it -- and tell me if this is what you  
3       understand, Special Agent Still.

4       Q                (By Ms. Davidson) He paid some of his other  
5       debts to USAA, with some of the money. So he -- so USAA  
6       would, I think, they're -- they would say their total loss  
7       is right in the amount of \$510,000; is that what you  
8       understand?

9       A                Right.

10      Q                We were talking about that just earlier today?

11      A                Yes, ma'am.

12                      A JUROR: He was probably trying to raise his  
13      credit score.

14                      MS. DAVIDSON: Yeah, he paid off his USAA credit  
15      card and things of this nature.

16      Q                (By Ms. Davidson) But what he -- what he got  
17      from his CD scheme is \$553,749.99, is that your  
18      understanding, Special Agent Still?

19      A                Yes, ma'am.

20      Q                And so that is what he was able to take before  
21      they reversed all the transactions?

22      A                Right. And some of that, like you said, you  
23      know, he used and they recouped some through -- able to  
24      reach out and grab it within their own institution.

25                      And something -- and it also accounts for his --

1 the -- we're not giving him the benefit of that -- that fee  
2 that the bank charged for the 30 day, we're not giving --  
3 essentially they paid themselves with stolen money. So  
4 we're charging that back to him.

5 MS. DAVIDSON: Yeah. So when he paid on one of  
6 his credit cards well they now found that payment not to be  
7 valid. So on that credit card he still owes the money.

8 Q (By Ms. Davidson) So if they were here to  
9 testify, they would say their total losses are roughly  
10 \$510,000, is that what you understand?

11 A Yes, ma'am.

12 MS. DAVIDSON: So we'll take a brief and be  
13 right back.

14 (Whereupon, the witness exited the Grand Jury  
15 Room at approximately 3:51 p.m. and reentered the Grand Jury  
16 Room at approximately 3:56 p.m.).

17 THE FOREPERSON: Mr. Still, you're still under  
18 oath?

19 THE WITNESS: Yes, ma'am.

20 Q (By Ms. Davidson) So just go through -- what  
21 are these?

22 A These are bank records from USAA Federal Savings  
23 Bank.

24 Let's look at this. This account number 3062.  
25 Let's go through this -- actually I need -- let me -- I just

1 like to kind of go old school on this. Let's look back a  
2 little bit before we even get here. Let's go -- let's look  
3 back at what -- in this -- in this account.

4 So these are the dates. 7-3, you're looking at  
5 6-30, you're seeing the following balances in this account.

6 Q Do you want me to make it go out?

7 A Yes, ma'am.

8 So you're seeing -- so these are -- this is  
9 before the scheme; right? So you're seeing the balances in  
10 there.

11 Q (By Ms. Davidson) And this is at Count No. 3,  
12 ending in 3062?

13 A Right. This is -- yes, 3062.

14 Q Show them again where -- at the top.

15 A 3062 (indicating).

16 Q And it's over there on the left, do you see?

17 A Right.

18 A JUROR: Bring it up just a little. It's a  
19 little blurry.

20 Q (By Ms. Davidson) So that's account 3062. And  
21 then that's Randall Keith Beane.

22 A So let's -- I think we -- does everybody see  
23 that first sheet? Oh, okay, where I showed them kind of  
24 prior to the fraud with this account, the kind of balances  
25 that were in this account.

1           You'll see at the very top, this is going to  
2 keep going up. You'll see it's up about to about 12,000 it  
3 looks like to me in that account approximately.

4           A JUROR: Look at that one going in and the wire  
5 in on 7-3. Because he -- he's does a nine -- a \$1900  
6 deposit and his balance goes from \$4400 to \$10,000, that's  
7 not right.

8           MS. DAVIDSON: No. It looks -- if you look at  
9 the, you know, the back -- it's -- he's got basically twelve  
10 oh four. And there's a debit for nineteen fifty-nine and  
11 his balance --

12          THE JUROR: But it goes the other way.

13          MS. DAVIDSON: Yeah.

14          THE JUROR: So -- yeah, he's got 4400 -- he's  
15 got \$4400 in his account. He wires in 1900 now he's got a  
16 thousand -- 10,000?

17          THE WITNESS: No, sir. Let me look at the  
18 other. Let's -- let's -- these are -- y'all have to -- this  
19 us in the financial world. These are extremely -- let's  
20 --if you'll look at the next sheet I think you'll answer --  
21 it will answer your question.

22               Where you can see on 7-5 there is -- you'll see  
23 that there's two -- and I'm not sure if these internal  
24 credits -- and you're looking at all at the same date on 7-5  
25 so you see a \$10,000 there in that account all on the same

1 day, USAA internal credit.

2 It kind of -- I'm going to show you up here kind  
3 of how it because --

4 THE JUROR: The balance numbers don't -- don't  
5 -- aren't real because they're not -- they're not linear.  
6 Again, here you look at this -- I think I understand what  
7 you're saying.

8 You're saying these are things that hit the same  
9 day --

10 THE WITNESS: Yes, sir.

11 THE JUROR: -- so the balance number isn't  
12 accurate because you've got the cash rewards credit, you've  
13 got the \$17.00, you've got a balance of \$12,000. And then  
14 you've got a \$5,000 credit, you've still got a balance of  
15 \$5,000.

16 Then you've got another \$5,000 credit you've got  
17 a balance of \$7,000. That's not -- the balance numbers  
18 aren't good.

19 We can -- what I'm -- but it sounds like that we  
20 can trust that these -- the transfers are right, but not the  
21 balance numbers.

22 THE WITNESS: And, again, I'm not arguing with  
23 you at all, sir and I'm not any bank record expert or  
24 anything, just what I'm seeing on the screen.

25 Q (By Ms. Davidson) And let's, you know, be

1 clear.

2 Not only have you reviewed these records, but,  
3 you know, the USAA fraud investigator has reviewed these  
4 extensively and relayed all the information that you've  
5 previously testified about?

6 A Right. I rely on it --

7 Q And so with bringing out these records, which  
8 are extremely confusing, we're only just trying to answer  
9 your question. So --

10 A Well -- so just moving up you'll see -- let's go  
11 into --

12 Q See those right there.

13 A Right. On 7-6 transfer from CD.

14 Can everybody see those?

15 A JUROR: Yes.

16 THE WITNESS: So there. And then right below it  
17 -- again, this is kind of -- I understand how confusing this  
18 is, but right below it you'll see the transfer out of the  
19 450 and the 500,000, 450,000 and 50,000, also on 7-6.

20 Does everybody see that?

21 A JUROR. Uh-huh (affirmative response).

22 THE WITNESS: Okay. I'm going to switch us to  
23 another account. Bear with me.

24 Q (By Ms. Davidson) Show the account number --

25 A I'll show you this account number, 4026.

1 Q Show -- pull it down so they can see the account  
2 holder.

3 A Randall Keith Beane.

4 Q Account number 4026?

5 A Right.

6 Can everybody see the funds credited to this  
7 account of -- there's a \$450,000 transfer --

8 A JUROR: There's no -- I can't -- I can't read  
9 it from here.

10 A JUROR: Zoom in. If you zoom in the focus is  
11 better.

12 Q (By Ms. Davidson) And then there is the wire  
13 out to Whitney Bank.

14 A JUROR: Right. That means the debit and the  
15 other is a credit.

16 THE WITNESS: I'm going to show you one other  
17 thing, sir, just to -- you know, you can't be sure enough, I  
18 agree with you and I appreciate that and thank you for it,  
19 but let me show you another document.

20 Right. Again, this -- so this is the wire and  
21 this is the transfer. And you'll see order, the order and  
22 customer name is Mr. Randall Keith Beane. The beneficiary,  
23 Buddy Gregg Motor Home. And the account, Whitney Bank in  
24 Baton Rouge, Louisiana.

25 And the figure on there is, as you'll see, is



1 the number I provided to the ladies and gentlemen earlier,  
2 the four ninety-three one ten and sixty-eight.

3 A JUROR: See, that's what bothers me. They  
4 knew that there was suppose to be four hundred and  
5 ninety-three in there and there wasn't.

6 THE WITNESS: Yes, ma'am, I understand.

7 Any other questions on bank records?

8 I'm happy to explain them.

9 MS. DAVIDSON: Any other questions at all on the  
10 facts?

11 I'm about done with this witness.

12 THE WITNESS: I do have one thing I just want to  
13 clarify for the Grand Jury.

14 First of all, I want to put -- on behalf of the  
15 Bureau I want to thank everybody. This is a -- I know this  
16 is a -- takes a lot of your time and everything and I want  
17 to thank you for -- for it.

18 Let me get my notes back out. I do have one  
19 other comment I wanted to make. And just for the benefit of  
20 the -- of the Grand Jury. You know, today I have said  
21 numerous times that Randall Beane did this, Randall Beane  
22 did that. It's obviously that I'm not sitting in front of a  
23 computer screen or I'm not watching that individual do these  
24 acts.

25 So when I say that Mr. Beane did this, it is

1 based on the evidence that I have with me right now. And I  
2 just wanted to reinforce that comment to the Grand Jury when  
3 I make those comments Mr. Beane did this or Mr. Beane did  
4 that. That is something I am deducting from the evidence  
5 that we have.

6 And I want to provide that, some of that  
7 evidence, just a short synopsis of that to you.

8 One is that the USAA system was not compromised.  
9 Meaning that they -- the system, somebody didn't hack in,  
10 according to USAA, and pretend like they're Mr. Beane.

11 The consistent use of the same IP address. I  
12 think of IP addresses like telephone numbers. So your  
13 computer calls another computer. It's just very similar to  
14 a telephone. Consistent use of -- of the same IP address.

15 Phone calls in to USAA match the telephone  
16 number as initially provided by the member, Mr. Beane.

17 Phone biometrics were used to log in. It's my  
18 understanding, again, this is coming from USAA, that you log  
19 in on -- on these apps through your phone now and the  
20 biometrics remain consistent.

21 And then Ms. -- Ms. Jarraf described that to --  
22 of Mr. Beane and the scheme worked in the video.

23 And, lastly, but most importantly, we arrested  
24 Mr. Beane in the motor home that was the basis for this  
25 fraudulent purpose.

1                   So when I say Mr. Beane committed these acts, it  
2 is based on that evidence in part. So just of the benefit  
3 of the Grand Jury.

4                   It's been an -- always an honor, again, thank  
5 you for your time today.

6           Q           (By Ms. Davidson) And one more big piece of  
7 evidence which I like. It was his Social Security number  
8 that was the fraudulent account number minus one digit?

9           A           That's right. It's my understanding is the real  
10 one was 243 and the account was 244.

11                   MS. DAVIDSON: Yes.

12                   A JUROR: Is Ms. Jarraf named in this  
13 Indictment --

14                   MS. DAVIDSON: Yes.

15                   THE JUROR: -- as a Defendant?

16                   MS. DAVIDSON: Yes, but I'm --

17                   THE JUROR: But that's not -- is that the right  
18 word, Defendant?

19                   MS. DAVIDSON: Yes.

20                   THE JUROR: When you summarized -- can you  
21 summarize what the Indictment -- part of the Indictment  
22 against her, he charges as far as she is concerned --

23                   MS. DAVIDSON: It charges her with -- solely in  
24 the money laundering account, which is the transfer of the  
25 money from USAA to Whitney Bank.

1                   And remember the testimony regarding the fact  
2                   that she called Whitney Bank and Buddy Gregg and told them  
3                   that -- to accept this money, that it was good money and  
4                   that she was the attorney representing Mr. Beane. And that  
5                   this money was basically good money, accept it.

6                   That she didn't know if there was some sort of  
7                   confusion with the Federal Reserve or -- and that she was  
8                   going to open an investigation, is that --

9                   THE WITNESS: She did reference opening an  
10                  investigation. And it's my -- my -- what I deduct from my  
11                  investigative experience that involving an attorney in these  
12                  types of transactions also kind of raises that level a  
13                  little bit and generally gives people somewhat piece of mind  
14                  that, you know, it is a valid transaction.

15                  THE JUROR: Can you summarize the evidence  
16                  against Mr. Beane in terms of money laundering?

17                  THE WITNESS: Yes, sir.

18                  So what we have -- the evidence wise would be  
19                  the conversation that -- where Ms. Jarraf is on there  
20                  with --

21                  Q                (By Ms. Davidson) The recording telephone call?

22                  A                Yes. That is -- that is the -- that is -- so  
23                  that's where we see, you know, where she is trying to  
24                  influence -- based on my investigative experience she is  
25                  trying to influence this situation, make this transaction go

1 through, this money laundering transaction of this -- the  
2 \$493,000 in order to purchase this -- this motor home.

3 And her knowledge of -- how do I say this, she  
4 has knowledge of these funds; right, because what if -- I  
5 mean, I can see where you could say -- be thinking she was  
6 just an attorney on behalf of her client trying to -- even  
7 though she's not licensed in the state of Tennessee, trying  
8 to make this deal happen.

9 But from the other video we're able to see where  
10 she has knowledge of -- of this CD scam.

11 Yes, sir.

12 THE JUROR: What was -- what's the date on that  
13 phone call?

14 THE WITNESS: The date on the --

15 THE JUROR: Is that not July 7th?

16 MS. DAVIDSON: It was either the July 6th or  
17 July 7th because the transfer was made on July 7th and the  
18 money was taken on the -- on July 6th.

19 THE WITNESS: And I think that -- I think the  
20 actual phone call, though, Ms. Davidson, I think that  
21 occurred on July -- again, I'm -- this is -- I'm not -- I'm  
22 looking at my notes, but I think it occurred on July 10th is  
23 what I remember from the posting would be that -- because,  
24 actually, when we picked the motor home up it was at Buddy  
25 Gregg.

1                   That's my understanding.

2                   A JUROR: At his residence?

3                   THE WITNESS: Ma'am?

4                   THE JUROR: At his residence?

5                   THE WITNESS: No, ma'am. It was still at the  
6 dealership. He was in the driver's seat, yes, ma'am, with  
7 the engine running.

8                   THE JUROR: So he never did take it home?

9                   THE WITNESS: I don't -- I don't know if he took  
10 it home or -- I know it was at Buddy Gregg for some  
11 additional services. So I'm not sure if he took it home,  
12 you know, on that July 7th and then brought it back on -- on  
13 the -- that Monday, but I know that it was there when we --  
14 when we arrested him, yes, ma'am.

15 Q                (By Ms. Davidson) Did you attempt to get Buddy  
16 Gregg to not transfer the motor home to him?

17 A                We -- it was not personally on those calls, Ms.  
18 Davidson. One of our -- I believe it was one of task force  
19 officers were. So I didn't personally --

20 Q                Do you know what happened in the --

21 A                I know they were just kind of keeping us abreast  
22 of the situation. We -- it's my understanding, again,  
23 relayed to me from another officer that, yes, you know, they  
24 were -- that Buddy Gregg was going to let us know when he  
25 was essentially leaving, you know, because, you know, they

1 -- they didn't stop him or anything. They weren't going to  
2 stop him, they were just -- they did give us a heads up is  
3 my understanding.

4 A JUROR: Again, the statements in the video  
5 that suggests she was aware that she was involved in the  
6 money laundering?

7 Did her statements in that video she posted  
8 suggest she was --

9 THE WITNESS: Statement -- statements that she  
10 didn't --

11 THE JUROR: Well, that suggested to you as a  
12 witness that she --

13 THE WITNESS: That the -- when I look at the  
14 conversations with Buddy Gregg and then the second  
15 conversation that she has -- I mean, with the information  
16 she puts out that to me shows knowledge that this -- where  
17 the source funds were.

18 When you assist in that, when you assist in a  
19 transaction of that type to me that is -- that's money  
20 laundering to a T.

21 Q (By Ms. Davidson) And remember the elements of  
22 a conspiracy to commit money laundering is simply, one, that  
23 you agree with someone else or you just have to prove the  
24 agreement.

25 And was Mr. Beane on the phone calls that she

1 was on?

2 A Yeah. And one thing about those calls -- again,  
3 this is the call at Buddy Gregg that we -- we picked up  
4 online. She constantly asked Mr. -- she -- I wouldn't say  
5 constantly, she -- on at least two occasions that I can  
6 recall, I'm pretty sure it was two, asked him to kind of  
7 reassure Mr. Beane this money is -- you have not asked that  
8 it be rescinded, you know, you're not asking that the money  
9 be taken back. She's -- she's actively involving him in  
10 those conversations.

11 Q And so they're working together in concert?

12 A Based on my investigative experience, I would  
13 say they're working together in concert to defraud.

14 Q And they had an agreement -- which in a  
15 conspiracy you only have to prove that they had an  
16 agreement.

17 Is there an agreement between those two  
18 individuals?

19 A Based on my investigative experience there would  
20 be an agreement based on their actions. Not a written  
21 agreement like we would think of, but, yeah, based on what I  
22 can deduct from these conversations.

23 Q And then to commit money laundering, which is in  
24 this case to transfer the money out of USAA to Whitney Bank  
25 for the purchase of this RV, which is basically to get the



1 money out of USAA so that they can't get it back?

2 A That's correct. Yes, ma'am.

3 MS. DAVIDSON: Does that answer your questions?

4 THE JUROR: Yes, thank you.

5 A JUROR: Do we know anything about the

6 relationship between Beane and the lawyer?

7 THE WITNESS: Jarraf?

8 THE JUROR: Yes.

9 THE WITNESS: This -- so I'm speculating a  
10 little bit here. I want to try to clarify when I do  
11 speculate.

12 At this arrest scene there was an individual  
13 referred to as Heather on the phone who -- who -- another --  
14 there were so -- when we arrest Mr. Beane there's two other  
15 individuals there with him, a male and a female. They were  
16 -- tried to give me the phone. There's a lady named Heather  
17 on here, an attorney, who wants to talk. And, actually,  
18 they gave me a piece of paper with her phone number and her  
19 phone number and her name on it.

20 Agent Jason Pack and I on Friday night attempted  
21 to contact her. She said that she could not speak with us  
22 -- or she spoke briefly with us and told us that she could  
23 no longer talk due to planning military operations,  
24 something to that effect.

25 We have subsequently learned that possibly,

1 again, speculating, that that comment meant, "Military  
2 operations," to try to remove Mr. Beane from the Knox County  
3 Detention Center. That's what, again, what I deduct.

4 MS. DAVIDSON: Any other questions?

5 A JUROR: They -- they -- a couple of the --  
6 brought out that in Indictment it says jumbo CD and on your  
7 paper it says super, does that matter that it's not --

8 MS. DAVIDSON: No, it doesn't because we -- in  
9 the Indictment we're referring to jumbo CDs just in the --  
10 in the objective sense that they're large CDs.

11 Any other questions?

12 (No response).

13 MS. DAVIDSON: Well, I will excuse you.

14 THE WITNESS: Thank you.

15 A JUROR: I do have one quick question, sorry.

16 I really have a problem trying to wrap around  
17 the idea that a fine institution that handles money all day  
18 long can accept somebody doing this. And without batting an  
19 eye and open a CD for, what was the first one, 500,000 in  
20 money? That they don't have any proof that there's 500,000  
21 to cover CD, and then it goes on to the 999,000.

22 If I go and use my debit card before I get back  
23 home it's already taken out of my account, you know what I'm  
24 saying? I can check my bank online and it's already gone.

25 How does an electronic wiring fraud happen when

1 I can't do it on a \$20 Food City grocery bill. I mean, they  
2 know before I leave that aisle that I've got \$20 in there to  
3 cover that bill.

4 How does that happen?

5 I mean, how --

6 MS. DAVIDSON: I don't know if that's a proper  
7 question for the consideration of the Grand Jury.

8 I mean, the fact of the matter, we showed you  
9 evidence that it did happen in this case.

10 Now, the fact that USAA may have been, you know,  
11 negligent in some way is really not relevant. There's just  
12 simply evidence that this did occur and that Mr. Beane got  
13 the funds, basically stole the money.

14 I mean, you know, it's similar thing where --  
15 you know, if somebody gives you -- somebody -- I mean, if an  
16 IRS check is mistakenly delivered to you in my name, Cynthia  
17 Davidson, and you go and cash it, you know, the Post Office  
18 made a mistake, but you're at fault for cashing a check that  
19 didn't belong to you.

20 THE JUROR: Well, if the bank put money in my  
21 account today --

22 MS. DAVIDSON: If it's not your money, you can't  
23 spend it.

24 THE JUROR: Yeah -- well, that's true. So it's  
25 his fault cause he spent it.

1 MS. DAVIDSON: Well, no, he -- he stole it.

2 You know, he went through --

3 A JUROR: He triggered the money going into his  
4 account.

5 MS. DAVIDSON: Right. By putting in the  
6 fraudulent routing number and the account number, you know,  
7 attempting this --

8 A JUROR: I mean, I have no doubt that he did  
9 many more --

10 MS. DAVIDSON: -- 40 times --

11 THE JUROR: -- a lot more.

12 MS. DAVIDSON: And there is a YouTube video out  
13 there, as he testified, explaining how to commit this type  
14 of fraud.

15 A JUROR: In other words, if he deposits \$3,000  
16 from the bank and they give you a slip that says you've put  
17 300,000 in there you can't spend that money?

18 A JUROR: Oh, is that right?

19 MS. DAVIDSON: Any other factual questions?

20 A JUROR: Are we having fun yet?

21 MS. DAVIDSON: Yeah, I know. And this -- all  
22 this happened too -- y'all -- it takes us usually months to  
23 investigate these things.

24 Any -- any other factual questions?

25 (No response).

1 MS. DAVIDSON: I'm going to excuse you.

2

3 (Whereupon, the witness exited the Grand Jury  
4 Room at approximately 4:19 p.m.).

5

6

END OF PROCEEDINGS

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C E R T I F I C A T E

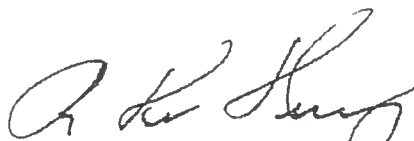
STATE OF ALABAMA )

SHELBY COUNTY )

I, ROBERT KEITH KENNEDY, Notary Public for the State of Alabama at Large, having sworn to keep secret the testimony given before the Grand Jury, hereby certify that I am the Certified Court Reporter who made machine shorthand notes of the foregoing proceedings at the time and place stated in the Caption herein; that I later reduced my shorthand notes into typewriting; and that the foregoing pages numbered two through sixty, both inclusive, contain a full, true, and correct transcript of the testimony given before the Grand Jury on that occasion.

I further certify that I am in no way related to nor employed by any of the Grand Jurors, the witness or the United States Attorneys conducting the examination of the witness; and that I have no interest in the outcome of this matter.

Given under my hand and seal this the 27th day of July 2017.



Robert Keith Kennedy  
CCR License No. 318

My Commission Expires  
September 4, 2018

TV2

**Live Database**  
**U.S. District Court - Eastern District of Tennessee (Knoxville)**  
**CRIMINAL DOCKET FOR CASE #: 3:17-cr-00082-TAV-CCS All Defendants**

Case title: USA v. Beane et al

Date Filed: 07/18/2017

Assigned to: Chief District Judge  
Thomas A Varlan  
Referred to: Magistrate Judge C  
Clifford Shirley, Jr

**Defendant (1)****Randall Keith Beane**

represented by **Bobby E. Hutson , Jr**  
Federal Defender Services of Eastern  
Tennessee, Inc. (Knox)  
800 South Gay Street  
Suite 2400  
Knoxville, TN 37929-9714  
865-637-7979  
Fax: 865-637-7999  
Email: bobby\_hutson@fd.org  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*  
*Designation: Public Defender or*  
*Community Defender Appointment*

**Pending Counts**

18 U.S.C. § 1343 - Wire Fraud  
(1-5)  
18 U.S.C. § 1344 - Bank Fraud  
(6)  
18 U.S.C. § 1956(h)- Conspiracy to  
Commit Money Laundering with  
Forfeiture Allegations  
(7)

**Highest Offense Level (Opening)**

Felony

**Terminated Counts**

None

**Disposition****Disposition**

**Highest Offense Level (Terminated)**

None

**Complaints**

None

**Disposition**

---

Assigned to: Chief District Judge  
Thomas A Varlan  
Referred to: Magistrate Judge C  
Clifford Shirley, Jr

**Defendant (2)****Heather Ann Tucci-Jarraf****Pending Counts**

18 U.S.C. § 1956(h)- Conspiracy to  
Commit Money Laundering with  
Forfeiture Allegations  
(7)

**Disposition****Highest Offense Level (Opening)**

Felony

**Terminated Counts**

None

**Disposition****Highest Offense Level (Terminated)**

None

**Complaints**

None

**Disposition****Plaintiff**

USA

represented by **Cynthia F Davidson**  
U S Department of Justice (Knox  
USAO)  
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**LEAD ATTORNEY****ATTORNEY TO BE NOTICED***Designation: United States Attorney*

Date Filed	#	Docket Text
07/18/2017	<u>1</u>	MOTION to Seal Case by USA as to Randall Keith Beane, Heather Ann Tucci-Jarraf. (JAN, ) (Entered: 07/20/2017)
07/18/2017	<u>2</u>	ORDER granting <u>1</u> Motion to Seal Case as to Randall Keith Beane (1), Heather Ann Tucci-Jarraf (2). Signed by Magistrate Judge H Bruce Guyton on July 18, 2017. (JAN, ) (Entered: 07/20/2017)
07/18/2017	<u>3</u>	SEALED INDICTMENT as to Randall Keith Beane (1) count(s) 1-7, and Heather Ann Tucci-Jarraf (2) count(s) 7. (Attachments: # <u>1</u> Criminal Cover Sheet Beane, # <u>2</u> Criminal Cover Sheet Tucci-Jarraf)(JAN, ) (Entered: 07/20/2017)
07/18/2017	<u>4</u>	Sealed Document: Unredacted Indictment (JAN, ) (Entered: 07/20/2017)
07/26/2017	<u>5</u>	PETITION for Writ of Habeas Corpus ad prosequendum by Randall Keith Beane. (RLK) (Entered: 07/26/2017)
07/26/2017	<u>6</u>	ORDER granting <u>5</u> Motion for Writ of Habeas Corpus ad prosequendum as to Randall Keith Beane. Signed by Magistrate Judge C Clifford Shirley, Jr on July 26, 2017. (RLK) (Entered: 07/26/2017)
07/26/2017	<u>7</u>	Writ of Habeas Corpus ad Prosequendum Issued as to Randall Keith Beane for July 27, 2017: Initial Appearance/Arraignment set for <b>7/27/2017</b> at 9:30 AM in Courtroom 3B - Knoxville before Magistrate Judge C Clifford Shirley Jr. (RLK) (Entered: 07/26/2017)
07/27/2017	8	Case unsealed as to Randall Keith Beane, Heather Ann Tucci-Jarraf (RLK) (Entered: 07/27/2017)
07/27/2017	<u>9</u>	Minute Entry for proceedings held before Magistrate Judge C Clifford Shirley, Jr: Initial Appearance and Arraignment Hearing as to Randall Keith Beane held on 7/27/2017. Attorney Bobby Hutson, Jr. appointed for Randall Keith Beane. Not guilty plea entered. Plea Agreement due by <b>9/13/2017</b> . Jury Trial set for <b>10/3/2017</b> at 9:00 AM in Courtroom 4 - Knoxville, before Chief District Judge Thomas A Varlan. Pretrial Conference set for <b>9/13/2017</b> at 9:00 AM in Courtroom 3B - Knoxville, before Magistrate Judge C Clifford Shirley Jr. (Court Reporter DCR)Defendant remanded to custody. (RLK) (Entered: 07/27/2017)
07/27/2017	<u>10</u>	CJA 23 Financial Affidavit by Randall Keith Beane. Approved by Magistrate Judge C Clifford Shirley, Jr on July 27, 2017. (RLK) (Entered: 07/27/2017)
07/27/2017	<u>11</u>	ORDER APPOINTING FEDERAL DEFENDER as to Randall Keith Beane. Signed by Magistrate Judge C Clifford Shirley, Jr on July 27, 2017. (RLK) (Entered: 07/27/2017)

07/27/2017	<u>12</u>	WAIVER of Detention Hearing by Randall Keith Beane (RLK) (Entered: 07/27/2017)
07/27/2017	<u>13</u>	ORDER OF DETENTION as to Randall Keith Beane. Signed by Magistrate Judge C Clifford Shirley, Jr on July 27, 2017. (RLK) (Entered: 07/27/2017)
07/27/2017	<u>14</u>	ORDER ON DISCOVERY AND SCHEDULING as to Randall Keith Beane. Signed by Magistrate Judge C Clifford Shirley, Jr on July 27, 2017. (RLK) (Entered: 07/27/2017)
07/27/2017	<u>15</u>	NOTICE OF HEARING as to Randall Keith Beane : Pretrial Conference set for <b>9/13/2017</b> at 9:00 AM in Courtroom 3B - Knoxville, before Magistrate Judge C Clifford Shirley Jr. (RLK) (Entered: 07/27/2017)
07/31/2017	<u>16</u>	Arrest Warrant Returned Executed on 7/27/17 in case as to Randall Keith Beane. (JAN, ) (Entered: 07/31/2017)

PACER Service Center			
Transaction Receipt			
07/31/2017 13:45:26			
PACER Login:	fp0112:2550672:0	Client Code:	-
Description:	Docket Report	Search Criteria:	3:17-cr-00082-TAV-CCS
Billable Pages:	2	Cost:	0.20

## UNITED STATES DISTRICT COURT

RECEIVED BY: RL  
DATE: 7/20/17 TIME: 0830

SEALED

for the  
Eastern District of Tennessee

A 11:13

U.S. MARSHAL E/TN  
KNOXVILLE, TN

SEALED

United States of America  
v.

RANDALL KEITH BEANE

Defendant

U.S. DISTRICT COURT  
EASTERN DIST. TENN.

Case No. 3:17-CR-82

## ARREST WARRANT

SEALED

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) RANDALL KEITH BEANE

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☐ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

the defendant, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, signals and sounds including funds he did not own, via wire, all in violation of Title 18, United States Code, Section 1343; devised a scheme to defraud financial institutions and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of financial institutions by means of false and fraudulent pretenses, representations, and promises, in order to obtain money and property fraudulently, in violation of Title, 18, United States Code, Section 1344; did unlawfully and knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to commit money laundering, in violation of Title 18, United States Code Sections 1956 and 1957

Date: 07/19/2017City and state: Knoxville, TN

Issuing officer's signature

Printed name and title

U.S. Magistrate Judge

Deputy Clerk

## Return

This warrant was received on (date) 7-20-17, and the person was arrested on (date) 7-27-17  
at (city and state) Knot Co JADate: 7-27-17

Arresting officer's signature

Amanda Shields Dean  
Printed name and title

FID# 10365588

1774-0720-2481-J

Case 3:17-cr-00082-TAV-CCS Document 16 Filed 07/31/17 Page 1 of 1 PageID #: 40

Case 3:17-cr-00082-TAV-DCP Document 173-1 Filed 05/03/18 Page 66 of 77 PageID #: 17775

## UNITED STATES DISTRICT COURT

RECEIVED BY: RowDATE: 7/20/17 TIME: 0830

SEALED

for the

Eastern District of Tennessee

U.S. MARSHAL E/TN  
KNOXVILLE, TN

SEALED

United States of America

v.

HEATHER ANN TUCCI-JARRAF

Defendant

Case No. 3:17-CR- 82

## ARREST WARRANT

Case No: 1:17-mj-531

Assigned To: Magistrate Judge Deborah A. Robinson

Date Assigned: 7/26/2017

Description: Arrest Warrant (Rule 40)

To: Any authorized law enforcement officer

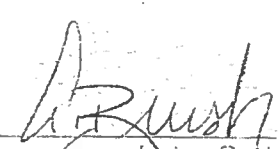
**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) HEATHER ANN TUCCI-JARRAF

who is accused of an offense or violation based on the following document filed with the court:

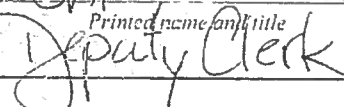
- ☒ Indictment   
 ☐ Superseding Indictment   
 ☐ Information   
 ☐ Superseding Information   
 ☐ Complaint  
☐ Probation Violation Petition   
☐ Supervised Release Violation Petition   
☐ Violation Notice   
☐ Order of the Court

This offense is briefly described as follows:

the defendant, did unlawfully and knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to commit money laundering, in violation of Title 18, United States Code, Sections 1956 and 1957.

Date: 19  
07/18/2017City and state: Knoxville, TN
  
 Issuing officer's signature

  
 U.S. Magistrate Judge

  
 Printed name and title  
 Deputy Clerk

## Return

This warrant was received on (date) 7-20-17, and the person was arrested on (date) 7-26-17  
 at (city and state) \_\_\_\_\_

Date: 7-26-17
  
 Arresting officer's signature

  
 Printed name and title  
 DUSM

FID#10365908

1774-0720-2495-J

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

FILED

2017 JUL 18 P 5:29

UNITED STATES OF AMERICA )

v. )

RANDALL KEITH BEANE, and )  
HEATHER ANN TUCCI-JARRAF )

No. 3:17-CR- 82

Judges: Varlan/Shirley

INDICTMENT

The Grand Jury charges as follows:

COUNTS ONE THROUGH FIVE

Wire Fraud  
(18 U.S.C. § 1343)

INTRODUCTION

Case No: 1:17-mj-531  
Assigned To: Magistrate Judge Deborah A. Robinson  
Date Assigned: 7/26/2017  
Description: Arrest Warrant (Rule 40)

At all times relevant to this indictment:

1. United States Automobile Association ("USAA") is a financial institution insured by the Federal Deposit Insurance Corporation ("FDIC") with a home office in San Antonio, Texas. USAA offers products in the insurance, banking investing, real estate and retirement arenas.
2. Federal Reserve Bank in New York is a financial institution, located in New York, New York.
3. Whitney Bank is a FDIC insured financial institution with a home office in Louisiana.
4. The defendant, RANDALL KEITH BEANE, was a member and account holder at United States Automobile Association ("USAA").

5. The defendant, **RANDALL KEITH BEANE**, did not have an account ending in xxxxx-1135 at the Federal Reserve Bank.

6. All wire transfers discussed herein went through the Automated Clearing House and Fedwire.

7. **HEATHER ANN TUCCI-JARRAF**, is not a duly licensed attorney in the states of Tennessee and Washington authorized to represent others in legal matters.

#### THE SCHEME

8. In or around July 2017, **RANDALL KEITH BEANE**, and others known and unknown to the Grand Jury, embarked upon a scheme through which they sought to obtain and access funds that did not belong to them by exploiting the online banking options available through USAA.

9. The scheme involved the use of a valid routing number ending in xxxxx-1452, belonging to Federal Reserve Bank, and a fictitious bank account number ending in xxxxx-1135.

10. It was part of the scheme to make numerous attempts using the valid routing number and fictitious bank account number to purchase jumbo Certificates of Deposit ("CDs") until a transfer was completed.

11. It was further part of the scheme to immediately liquidate the CDs and then transfer proceeds from the CDs to **BEANE'S** personal bank account to purchase assets and pay personal expenses with funds that did not belong to him, including the purchase of a 2017 Entegra Cornerstone 45B; 45 foot diesel motorhome.

12. It was further part of the scheme that **HEATHER ANN TUCCI-JARRAF** purported to be **BEANE'S** attorney in order to induce, coerce and convince certain financial institutions to accept the fraudulently obtained funds for payment of a 2017 Entegra Cornerstone 45B; 45 foot diesel motorhome.

**MANNER AND MEANS**

13. In furtherance of the scheme, and to accomplish the ends thereof, the defendant, **RANDALL KEITH BEANE**, and others known and unknown to the Grand Jury, used the following means, among others:

- a. Defendant **RANDALL KEITH BEANE** was a member and account holder at United States Automobile Association ("USAA"):
- b. The defendant, **RANDALL KEITH BEANE**, did not hold an account ending in xxxxx-1135 at Federal Reserve Bank.
- c. The defendant, **RANDALL KEITH BEANE**, obtained from others known and unknown to the Grand Jury, the valid routing number of Federal Reserve Bank, that is routing number ending in xxxxx-1452.
- d. The defendant, **RANDALL KEITH BEANE** used his mobile device to access his USAA account.
- e. The defendant, **RANDALL KEITH BEANE**, would and did conduct electronic financial transactions, including the purchase and attempted purchase of jumbo CDs through USAA, in which the defendant **RANDALL KEITH BEANE**, falsely represented the funding source by using a fictitious account number, that is account number ending in xxxxx-1135.
- f. The vast majority of CDs the defendant, **RANDALL KEITH BEANE**, attempted to purchase through the scheme were returned as invalid because there was no valid account number entered. However, two CDs were funded by USAA bank and liquidated by the defendant, **RANDALL KEITH BEANE**, before USAA could reverse the transaction.

g. The defendant, **RANDALL KEITH BEANE**, would and did use funds fraudulently acquired through the CD purchase scheme to make purchases for his own personal benefit to include the purchase of a 2017 Entegra Cornerstone 45B; 45 foot diesel motorhome.

#### **EXECUTION OF THE SCHEME**

14. The allegations set forth in Paragraphs One through Thirteen are incorporated herein for reference for the purpose of alleging violations of 18 U.S.C. § 1343.

15. On or about the dates set forth below, within the Eastern District of Tennessee and elsewhere, the defendant, **RANDALL KEITH BEANE**, for the purposes of executing and attempting to execute the above-described scheme and artifice to defraud, purchased jumbo CDs with funds that did not belong to him by using routing numbers that did not belong to his accounts and fictitious bank accounts, and in so doing did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, signals and sounds including, without limitation the following:

COUNT	DATE	DESCRIPTION OF TRANSMISSION
1	7/6/2017	BEANE transferred funds he did not own, via wire, using Federal Reserve New York, routing number xxxxx-1452 and fictitious account number ending xxxxx-1135 to purchase CD number xxxxx-4613 in the amount of \$500,000.
2	7/6/2017	CD number xxxxx-4613 in the amount of \$500,000 was closed and funds in the amount of \$499,909.59 were transferred, via wire, to one of BEANE'S personal bank accounts at USAA, account number ending in xxxxx-3062.
3	7/6/2017	BEANE transferred funds he did not own, via wire, using Federal Reserve New York, routing number xxxxx-1452 and fictitious account number xxxxx-1135 to purchase CD number xxxxx-4623 in the amount of \$999,000.



COUNT	DATE	DESCRIPTION OF TRANSMISSION
4	7/6/2017	CD number xxxxx-4623 in the amount of \$999,000 was closed and funds in the amount of \$998,819.36 were transferred, via wire, to one of BEANE'S personal bank accounts at USAA, account number xxxxx-3062.
5	7/7/2017	BEANE transferred the sum of \$493,110.68, via wire from BEANE's personal account number xxxxx-4026 to Whitney Bank account number xxxxx-4960 belonging to B.G., whose identity is known to the Grand Jury, for the purchase of a 2017 Entegra Cornerstone 45B; 45 foot diesel motorhome.

All in violation of Title 18, United States Code, Section 1343.

**COUNT SIX**

**BANK FRAUD**  
**(18 U.S.C. § 1344)**

16. The allegations contained above in Paragraphs One through Fifteen are incorporated herein by reference for the purpose of alleging a violation of Title 18, United States Code, Section 1344.

17. From on or about July 5, 2017, continuing through at least on or about July 11, 2017, in the Eastern District of Tennessee, for the purpose of executing the scheme described above, the defendant, **RANDALL KEITH BEANE**, devised a scheme to defraud financial institutions and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of financial institutions by means of false and fraudulent pretenses, representations, and promises, executed and attempted to wit, to purchase Certificates of Deposit with money that did not belong to him, without permission or authority, alter the financial instruments, and liquidate the CDs at and through financial institutions in order to obtain money and property fraudulently and for defendant's own use and benefit.

All in violation of Title 18, United States Code, Section 1344.

COUNT SEVEN

CONSPIRACY TO COMMIT MONEY LAUNDERING  
(18 U.S.C. § 1956(h))

18. The allegations contained above in Paragraphs One through Seventeen are incorporated herein by reference for purpose of alleging conspiracy to commit money laundering in violation of Title 18, United States Code, Section 1956(h).

19. The Grand Jury further charges that in on or about July 2017, in the Eastern District of Tennessee and elsewhere, the defendants **RANDALL KEITH BEANE** and **HEATHER ANN TUCCI-JARRAF**, did unlawfully and knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to commit certain offenses against the United States, in violation of Title 18, United States Code, Sections 1956 and 1957, as follows:

a. knowingly conducting and attempting to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, (wire fraud, bank fraud), in violation of Title 18, United States Code, Sections 1343 and 1344, with the intent to promote the carrying on of a specified unlawful activity, that is bank and wire fraud, and that while conducting such financial transactions knew that the property involved in the financial transactions represented the proceeds for some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

b. knowingly conducting and attempting to conduct financial transactions affecting interstate commerce, which involved the proceeds of specified unlawful activity, that is: (1) wire fraud in violation of 18 U.S.C. § 1343 and (2) bank fraud in violation of 18 U.S.C. § 1344, 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, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

c. knowingly engaging and attempting to engage in monetary transactions by, through or to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is (1) wire fraud in violation of 18 U.S.C. § 1343; and (2) bank fraud in violation of 18 U.S.C. § 1344, in violation of Title 18, United States Code, Section 1957.

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

#### FORFEITURE ALLEGATIONS

20. The allegations contained in Counts One through Seven of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 982(a)(1), 982(a)(2) and 28 U.S.C. § 2461.

21. Pursuant to 18 U.S.C. § 982(a)(2), upon conviction of any offense in violation of 18 U.S.C. §§ 1344, 1343, and any defendant so convicted shall forfeit to the United States any property, real or personal, constituting or traceable to the proceeds of any violation of 18 U.S.C. §§ 1344, 1343, including but not limited to the following property:

- a. 2017 Entegra Cornerstone 45B; 45 foot diesel motorhome; VIN # 4VZVU1E94HC082752; topaz in color with eight wheels ("motorhome"); and
- b. A personal money judgment in favor of the United States and against the defendant, **RANDALL KEITH BEANE**, in the amount of \$553,749.99, which represents the proceeds the defendant personally obtained, directly or indirectly, as a result of the criminal violations of 18 U.S.C. §§ 1343; and 1344.

22. Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of an offense in violation of 18 U.S.C. 1956(h), any defendant so convicted shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property, including but not limited to the following property:

- a. 2017 Entegra Cornerstone 45B; 45 foot diesel motorhome; VIN # 4VZVU1E94HC082752; topaz in color with eight wheels ("motorhome").

23. Pursuant to Title 21, United States Code, Section 853(p), the defendants shall forfeit substitute property, up to the value of the property subject to forfeiture, if by any act or omission of any of the defendants, said property, or any portion thereof:

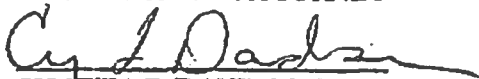
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided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

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461.

A TRUE BILL:

Signature Redacted  
FOREPERSON

NANCY STALLARD HARR  
UNITED STATES ATTORNEY

  
CYNTHIA F. DAVIDSON  
ANNE-MARIE SVOLTO  
Assistant United States Attorneys

FBI/Still

## UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

RECEIVED BY: RowDATE: 7/20/17TIME: 0830U.S. MARSHAL E/TN  
KNOXVILLE, TN

SEALED

SEALED

United States of America

v.

HEATHER ANN TUCCI-JARRAF

*Defendant*Case No. 3:17-CR- 82

## ARREST WARRANT

Case No: 1:17-mj-531  
Assigned To: Magistrate Judge Deborah A. Robinson  
Date Assigned: 7/26/2017  
Description: Arrest Warrant (Rule 40)

To: Any authorized law enforcement officer

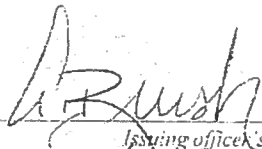
**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) HEATHER ANN TUCCI-JARRAF

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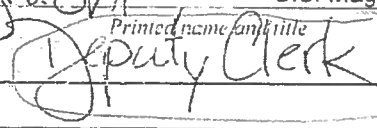
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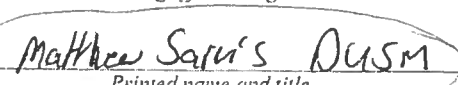
Date: 07/19/2017City and state: Knoxville, TN
  
 Issuing officer's signature

  
 U.S. Magistrate Judge

  
 Printed name and title  
 Deputy Clerk

## Return

 This warrant was received on (date) 7-20-17 and the person was arrested on (date) 7-26-17  
 at (city and state) \_\_\_\_\_
Date: 7-26-17
  
 Arresting officer's signature

  
 Printed name and title  
 Matthew Sarr's DUSM

FID#10365908

1774-0720-2495-J

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

FILED

2017 JUL 18 P 5:29

UNITED STATES OF AMERICA )

v. )

RANDALL KEITH BEANE, and )  
HEATHER ANN TUCCI-JARRAF )

No. 3:17-CR- 82

Judges: Varlan/Shirley

U.S. DISTRICT COURT  
EASTERN DIST. OF TENN.

INDICTMENT

The Grand Jury charges as follows:

COUNTS ONE THROUGH FIVE

Wire Fraud  
(18 U.S.C. § 1343)

INTRODUCTION

Case No: 1:17-mj-531

Assigned To: Magistrate Judge Deborah A. Robinson

Date Assigned: 7/26/2017

Description: Arrest Warrant (Rule 40)

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