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AO 91 (Rev. 11/11) Criminal Complaint

Special Agent:

Sean Lobar

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America v. Sean Tissue

Case No.

Case: 2:22-mj-30330

Assigned To: Unassigned Assign. Date: 8/4/2022

USA V. SEALED MATTER (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.						
On or abo	out the date(s) of _	Jan	uary 31, 2019	in the county of	Wayne	_ in the
Eastern	District of	Michigan	, the defen	dant(s) violated:		
Code Section			Offense Description			
18 U.S.C. § 1343			Wire Fraud			
This crim	ninal complaint is b	ased on these	facts:			
✓ Continued or	n the attached sheet		_	Su MM Mi Complainant	a signatura	
			_	Sean Lobar, Sp Printed name	ecial Agent	
Sworn to before me a and/or by reliable ele	and signed in my preser ectronic means.	ce		Kin M	Alk	
Date: August 4,	2022		-	Judge's si	gnature	
City and state: Detroit, MI				Kimberly G Altman, U.S. Magistrate Judge Printed name and title		

Affidavit of FBI Special Agent Sean Lobar

- I, Special Agent Sean Lobar, hereafter referred to as AFFIANT, being duly sworn on oath, state as follows:
 - 1. AFFIANT has been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since July 2015. I am currently assigned to the Complex Financial Crimes squad, where I investigate crimes involving fraud and money laundering. During my tenure with the FBI, I have participated in numerous investigations, during which I have, among other things, conducted physical and electronic surveillance, executed search warrants, reviewed and analyzed recorded conversations and records, and debriefed cooperating witnesses. During these investigations, I have been the affiant on search warrants for premises, electronic mail (e-mail) accounts, and other digital records. Prior to joining the FBI, I worked for three years as an attorney including a clerkship with a federal judge on the U.S. Court of Appeals for the Armed Forces.
 - 2. The information contained within this affidavit is based on my training and experience, reports made to me by reported victims, information relayed to me by other law enforcement officers, and my review of other records and reports.

PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a criminal complaint alleging violation of 18 U.S.C. § 1343 (Wire Fraud) by Sean Phillip TISSUE ("TISSUE"). This affidavit does not set forth all of my knowledge about this matter.

SUMMARY OF WIRE FRAUD SCHEME

4. For the reasons set forth below, TISSUE, with various coconspirators and agents, is believed to have engaged in a real estate investment fraud scheme primarily targeting Israeli investors from approximately 2018 to 2021, through The Centureon Companies Inc ("CENTUREON") and related companies. TISSUE's scheme was accomplished using interstate and foreign wire communications and transfers. During the course of the scheme, TISSUE lived in and operated from Wayne County and Oakland County, in the Eastern District of Michigan.

TISSUE'S PREVIOUS REAL ESTATE INVESTMENT FRAUD

5. According to admissions that TISSUE made in court records in a civil lawsuit in June 2017 which I have personally reviewed, TISSUE previously engaged in a real estate investment-based wire fraud scheme involving the ostensible sale of real estate around 2015.

6. These same records show that several of the investors sued TISSUE and his companies – Greystone Home Builders, LLC ("GREYSTONE") and Sycamore Homes, LLC ("SYCAMORE") – in the Northern District of Texas. As part of that lawsuit, TISSUE admitted that he and his companies defrauded the investors of over half a million dollars, which the investors paid to TISSUE and his companies via interstate wire, expecting that TISSUE would purchase and construct real estate on their behalf with the funds provided. He did not. TISSUE also admitted that he caused false information to be provided to the investors' bank in order to further the scheme.

BEGINNING OF CENTUREON FRAUD SCHEME

7. Around August 2018, TISSUE and others began a new iteration of their investment fraud scheme through the newly formed The Centureon Companies Inc. ("CENTUREON") and related companies. The FBI has interviewed victims of CENTUREON's fraud scheme and has reviewed communication records and related real estate documents provided by victims. According to victim interviews and records, TISSUE used the pseudonym "Sean RYAN" with CENTUREON investors and vendors, possibly due to the prior civil suits against him identifying his previous fraud.

- 8. CENTUREON was organized in the Eastern District of Michigan, and TISSUE operated CENTUREON from the Eastern District of Michigan. According to the Michigan Department of Licensing and Regulatory Affairs, CENTUREON was formed in July 2018 with a resident agent address in Flint, Michigan, and no registered office mailing address. According to JPMorgan Chase Bank records obtained via legal process, CENTUREON's monthly statements began in August 2018 and were initially directed to an address in Flint, Michigan. The September 2018 statement was sent to CENTUREON at an address in Lake Orion, MI which according to commercial database records was at that time the address of TISSUE's fiancée, A.M. The March 2019 statement was sent to an address in Bloomfield, Michigan which according to commercial database records was also an address of TISSUE's fiancée, A.M. The September 2020 statement was sent an address in Oakland Township, Michigan, which based on other records I believe to have been TISSUE's residence at the time.
- 9. According to victim interviews and records, TISSUE and his employees and agents used email addresses with domain name "@rentvestor.com" in communications with CENTUREON's investment fraud victims and related business dealings. According to GoDaddy internet domain registration records obtained via legal process, "Shopper ID 53323482" is registered to

Sean Tissue of Centureon Investments, email sean@rentvestor.com, address Oakland Township, Michigan, and was created on June 2, 2012, and last changed on March 26, 2022. GoDaddy records indicate approximately fifty-seven domains past and present registered to TISSUE's Shopper ID, including multiple variations of SYCAMORE, GREYSTONE, CENTUREON, and RENTVESTOR.

CENTUREON TOOK OVER \$600,000 IN PAYMENT FROM ISRAELI INVESTORS BUT NEVER PROVIDED THE PROMISED PROPERTIES

10. According to victim interviews and records, CENTUREON used Israeli recruiters and facilitators to target Israeli investors seeking real estate in the United States. In at least one case, investors were told to direct funds to a title agency operating in Oakland County, Michigan, but were in fact provided bank account and routing information for CENTUREON's bank account. According to email records, on January 24, 2019,

R**.V*******@rentvestor.com, whose signature block provided that he was a "Business Local Partner, Israel" for CENTUREON, emailed Israeli investors in Hebrew and copied "Sean Ryan" (the pseudonym used by TISSUE in the CENTUREON scheme). The email had subject "asset portfolio purchase – escrow account information for transfer" and directed the Israeli investors to wire \$634,175 to what they were told was the

account of a specific local title agency (which operates out of Oakland County, Michigan), for the purpose of purchasing real estate. The total cost of \$634,175 was broken down in the instructions to four individuals in different amounts: \$221,517 from Natan, \$110,790 from Noam, \$150,933 from Y.Z., and \$150,933 from Y.R. However, the email in fact provided bank routing and account information for CENTUREON's bank account. The investors reported that they believed they were paying a title agency, but in fact CENTUREON took the investors' money and did not provide the properties as promised.

11. According to records from CENTUREON's JPMorgan Chase bank account, CENTUREON received international wires from Israeli banks including the following: \$218,278.00 on January 30, 2019 from Nathan; \$110,000.00 on January 29, 2019 from Noam; \$150,933.00 on January 29, 2019 from Y.Z.; and \$150,933.00 on January 31 from Y.R. I believe that the above international wires were payment made to CENTUREON, and thereby TISSUE, by the Israeli investors based on the false representation that the investors were sending money to escrow to purchase U.S. property from CENTUREON. In fact, based on CENTUREON's instructions, the investors unknowingly sent funds directly to CENTUREON and CENTUREON did not provide the properties as promised. According to the bank records, the

above wires were sent from Israel to CENTUREON's JPMorgan Chase Bank account. CENTUREON, according to its registration and bank records, is based in Michigan. JPMorgan Chase Bank, according to its filings with the U.S. Securities and Exchange Commission, has its principal office in New York.

CENTUREON PROMISED PROPERTY RENOVATIONS AND PROPERTY MANAGEMENT TO ISRAELI INVESTORS BUT DID NOT PROVIDE EITHER

12. In other cases, investors purchased Detroit area properties, renovations, and property management services from CENTUREON, but were only provided deeds and a few months of ostensible tenant payments before CENTUREON cut off contact. According to an interview of Israeli investor victim M.R. and supported by email and WhatsApp chat records, M.R. was initially recruited by two Israeli recruiters, who put M.R. in touch with CENTUREON. M.R. corresponded with K.M., J.V., and "Sean Ryan" of CENTUREON, whom M.R. later learned to be TISSUE. M.R purchased two Detroit area properties, including renovations and property management services, from CENTUREON. According to records provided by M.R., one of the properties that M.R. purchased from CENTUREON was ***** Kentfield Street in Detroit. According to the warranty deed for the property provided by M.R., M.R., whose address was provided as New York (and who

primarily lives in Israel), purchased the Kentfield property on January 2, 2020 for \$52,550. According to JPMorgan Chase Bank records obtained via legal process, which I have personally reviewed, CENTUREON's JPMorgan Chase Bank account received a \$46,865.35 wire on January 3, 2020, from a title agency operating in Oakland County, Michigan, with a memo indicating that the funds were proceeds from the sale of **** Kentfield. I believe that that the \$46,865.35 was payment received by CENTUREON from M.R., via a title company (and minus closing costs) for the purchase of *****

13. According to M.R., CENTUREON provided deeds to the properties that M.R. purchased but did not provide renovations; CENTUREON sent ostensible tenant rent payments for a few months before cutting off contact. M.R. through an attorney asked TISSUE to fix the problems with the houses or return M.R.'s money. TISSUE's attorney stated that TISSUE would make things right, but TISSUE delayed for several months and TISSUE's lawyer then left because TISSUE was reportedly not paying the lawyer. M.R.'s attorney then contacted TISSUE directly and TISSUE again said that he would make things right, but again ended up doing nothing. In the course of preparing a lawsuit against "Sean Ryan," M.R. learned that "Sean Ryan" was in fact TISSUE. M.R. subsequently communicated with others on social

media and found a group of approximately fifteen other Israeli investors who believed that they were scammed by TISSUE. Through my investigation, I have also learned of other Israeli investors who I believe to have been defrauded by TISSUE as part of the CENTUREON scheme.

14. TISSUE communicated with victim M.R. via WhatsApp to advance his scheme. For example, according to WhatsApp records provided by M.R., on December 13, 2019, TISSUE (then known to M.R. as "Sean Ryan" or "Sean Rayan") wrote to M.R. via WhatsApp, "Hi [M.] – This is Sean Ryan with Centureon. Nez asked me to reach out to you for some questions you may have about our company. Let me know if you have time to connect." On December 22, 2019, TISSUE wrote, "Hi [M.] - I heard from Realty you had some questions about the closing documents. Can we set a time to talk tomorrow morning? I'm not working today." On June 17, 2020, TISSUE wrote, "Hi [M.] - Just wanted to update you quickly. Everything is caught up with your account. You will be receiving the rent from April, and current month rent tomorrow." TISSUE added, "Thanks for the Patience." At the time of the WhatsApp communications, M.R. was located in Israel. I believe that at the time of the WhatsApp communications, TISSUE was located in the United States.

15. Consistent with TISSUE's promises of "rent" paid to M.R., JPMorgan

Chase Bank records for CENTUREON show four domestic wires from

CENTUREON to M.R. from March to July 2020, ranging from \$1,114.00 to

\$2,836.00, directed through Rego Park, New York.

TISSUE USED CENTUREON TO CONDUCT INTERSTATE AND INTERNATIONAL WIRE FRAUD

- 16.In my training and experience, CENTUREON's actions are consistent with real estate investment fraud schemes perpetrated in the Detroit area against foreign investors. Consistent with other "Ponzi" type schemes, I believe that the ostensible "rent" payments made by CENTUREON in Michigan to M.R. via New York were interstate wires made in furtherance of the CENTUREON real estate fraud scheme, designed to induce M.R. and others to continue to "invest" with CENTUREON.
- 17. According to, among other sources, including an article published in Challenge Magazine and dated December 9, 2021, TISSUE is the Chief Executive Officer (CEO) of CENTUREON.
- 18. According to the JPMorgan Chase Bank records obtained via legal process, which I have personally reviewed, TISSUE was the authorized signer on CENTUREON's bank account. According to JPMorgan Chase Bank records, CENTUREON's account was initially opened in August 2018 using

- a business address in Flint, Michigan and with CENTUREON employee J.V. as the sole authorized signer on the account. According to JPMorgan Chase Bank records, TISSUE was added as an authorized signer in October 30, 2018. According to JPMorgan Chase Bank records, CENTUREON employee J.V. was removed as an authorized signer on November 17, 2018, leaving TISSUE as the sole authorized signer on the account.
- 19. The JPMorgan Chase Bank records for CENTUREON's account show CENTUREON receiving money until April 2021, and its bank account closing July 2021. In addition to real estate related spending, CENTUREON's bank records indicate significant spending on what appear to be items of personal benefit to TISSUE, including entertainment, fantasy football, museum admissions, movie theatres, gambling, Universal Studios, a home theatre company, country club, ski resort, martial arts training, concert tickets, watersports, Xbox Live, waterpark, medical care, a private physicians group, student loans, other retail and shopping, and private schooling.
- 20.I believe that Sean TISSUE, through his company CENTUREON and with the assistance of his agents, employees, and associates, devised a scheme to defraud and to obtain money by means of false or fraudulent pretenses, representations, or promises, namely, false promises of providing property

and property refurbishment and management services through
CENTUREON. I believe that TISSUE, for purposes of executing the
CENTUREON fraud, transmitted and caused to be transmitted writings by
means of wire in foreign or interstate commerce, including emails and
WhatsApp messages to investors in Israel, as well as interstate and
international bank wirings.

CONCLUSION

- 21.AFFIANT respectfully submits that there is probable cause to believe that SEAN TISSUE has committed wire fraud in violation of 18 U.S.C. § 1343
- 22.AFFIANT respectfully requests that a warrant be issued authorizing the arrest of SEAN TISSUE.

Sean Lobar

Special Agent, FBI

Sworn to before me and signed in my presence and/or by electronic means.

Kimberly G. Altman

UNITED STATES MAGISTRATE JUDGE

Dated: August 4, 2022