AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Oregon

United States of America
v.

Daejon Labrayae Love and
Taylor Jamie Chan,

Defendant(s)

Case No. 3:26-mj-00227

SEALED

CRIMINAL COMPLAINT
BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2022 - March 2026 in the county of Clackamas in the District of Oregon, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud
18 U.S.C. § 1343	Wire Fraud

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent Tyler Esswein.

☑ Continued on the attached sheet.

/s/ By Phone
Complainant's signature

Tyler Esswein, Special Agent, FBI
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 2:10 ~~a.m.~~/p.m.

Date: 08/17/2026

Jolie A. Russo
Judge's signature

City and state: Portland, Oregon

Hon. Jolie Russo, U.S. Magistrate Judge
Printed name and title

SEALED 3:26-mj-00227

DISTRICT OF OREGON, ss: AFFIDAVIT OF **SPECIAL AGENT TYLER ESSWEIN**

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Tyler Esswein, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since May 2017. My current assignment is Complex Financial Crimes. In this capacity, I investigate a variety of violations to include investment scams, wire and bank frauds, and money laundering. My training and experience includes extensive specialized training including completing the 21-week New Agent Training course at the FBI Academy in Quantico, Virginia. In my role as a Special Agent for the FBI, I have participated in many aspects of investigations, including conducting physical surveillance, assisting in managing and recruiting confidential sources, interviewing witnesses, subjects, and victims, performing arrests, and executing search warrants. Through these investigations, I have become familiar with methods and techniques used by individuals to conduct fraud and investment scams. In the course of investigations, I have utilized the techniques such as the use of grand jury subpoenas for banking information, medical records, subscriber information, and social media accounts. I have also interviewed numerous victims and witnesses to fraud crimes, and exploited the information provided to solidify evidence against the subjects of those investigations. Prior to my employment as a Special Agent, I worked as a certified public accountant (CPA) for approximately seven years.

I submit this affidavit in support of criminal complaints and arrest warrants for Daejon Labrayae Love and Taylor Jamie Chan, in violation of 18 U.S.C. § 1349 (conspiracy to commit wire fraud). As set forth below, there is probable cause to believe, and I do believe, that Daejon

Labrayae Love and Taylor Jamie Chan conspired to commit wire fraud, in violation of 18 U.S.C. § 1349.

Applicable Law

2. 18 U.S.C. § 1349 (conspiracy to commit wire fraud) requires evidence that: (1) two or more persons agreed to commit wire fraud; and (2) a defendant willfully joined the conspiracy with the intent to further its unlawful purpose. 18 U.S.C. § 1343 (wire fraud) requires evidence that: (1) there was a scheme to defraud for the purpose of obtaining money or property by means of false or fraudulent pretenses, representations, or promises; (2) the statements made as part of the scheme were material; that is, they had a natural tendency to influence, or were capable of influencing, a person to part with money or property; (3) the defendant acted with the intent to defraud, that is, the intent to deceive and cheat; and (4) the defendant used, or caused to be used, an interstate or foreign wire communication to carry out or attempt to carry out an essential part of the scheme.

3. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have not set forth each and every fact that I, or others, have learned during the course of this investigation. When the statements of others are set forth in this affidavit, they are set forth in substance and in part.

Statement of Probable Cause

4. I have probable cause to believe that **Daejon Labrayae Love** and **Taylor Jamie Chan** conspired from at least February 2022 until at least March 2026 to obtain proceeds from

victims under false representations that the proceeds would be used for the victims' personal investments, in violation of 18 U.S.C. § 1349 (conspiracy to commit wire fraud). Beginning in at least February 2022, Daejon Labrayae Love and Taylor Jamie Chan devised fictitious investment schemes to defraud numerous women, including female presenting people, in Oregon, Washington, and California, many of whom Daejon Labrayae Love was romantically involved with. Daejon Labrayae Love and Taylor Jamie Chan solicited money from these women under false pretenses and as part of their scheme, which lasted until at least March 2026. Some of the electronic communications Daejon Labrayae Love and Taylor Jamie Chan sent to victims in furtherance of the fraud (or caused to be sent) were interstate to or from Oregon.

Subjects of the Investigation

5. **DAEJON LABRAYAE LOVE** (hereinafter, "Love") is a 35-year-old male who created fictitious personas to defraud numerous women he met primarily on online dating platforms. Love frequently falsely portrayed himself as a wealthy National Football League player for the San Francisco 49ers, or a real estate investor from Switzerland. Love convinced many of his victims that they were in sincere romantic relationships with him and that he was financially savvy and successful to gain their trust. Love advertised nonexistent investments, which Love claimed would generate massive returns, to his victims. Victims sent Love and his co-conspirator, Taylor Jamie Chan, money believing they would invest the money in legitimate investments on the victims' behalf. Some victims also loaned Love large amounts of money believing Love would easily pay the money back. Neither Love nor Taylor Jamie Chan ever invested the money or returned the money victims gave them in full. Love has used multiple names such as "Jon Love," "Daejon Love," "Avril Lyto Love" and "Jordan Love" to

communicate with victims.

6. **TAYLOR JAMIE CHAN** (hereinafter, "Chan") is an 18-year-old man, and Love's co-conspirator. Chan falsely portrayed himself to victims as Love's financial adviser to further gain their trust and convince them to invest their money in bogus investments. As part of their scheme, Chan and Love exchanged investment-related electronic communications in which Chan falsely portrayed himself as Love's investment adviser. Love sent numerous victims screenshots of these communications between Love and Chan in which the two discussed fictitious investment opportunities. Chan and Love also engaged in three-way FaceTime calls with victims. During the calls, Chan showed victims falsified investment gains. Some victims sent their money directly to Chan (as directed by either Love or Chan) under the false belief Chan would invest their money on their behalf.

Daejon Labrayae Love

Taylor Jamie Chan

Overview of the Scheme

7. Love and Chan devised fictitious investment schemes to defraud numerous women in Oregon, Washington, and California from at least February 2022 until at least March 2026. To date, investigators have identified 26 women whom investigators believe are victims of Love and Chan's scheme. Love met most of the victims through online dating platforms such as Tinder, Bumble, Hinge, and Facebook Dating. Love developed romantic relationships with many of the victims and told them he wanted to settle down and build wealth with them by investing together. Love portrayed himself as wealthy and successful to his victims to entice them to place their money into nonexistent investments and to also loan him money. With some victims, Love posed as a National Football League (hereinafter, "NFL") player for the San Francisco 49ers (hereinafter, "49ers"). With other victims, Love claimed to be a wealthy Swiss real estate developer. Chan falsely purported himself to be Love's financial adviser in furtherance of their scheme. Investigators have found no evidence that Love or Chan invested any of the victims' money or repaid their loans in a manner consistent with representations they made to the victims.

8. Love crafted a lifestyle and online persona which created the illusion that he was exceedingly wealthy. Love sent his victims photographs and videos showing Love wearing what appeared to be expensive jewelry, designer clothing and accessories, and driving exotic cars.

9. Love falsely told some of his victims that he was a wealthy 49ers player to encourage them to invest in Love and Chan's scheme. To convince his victims, Love posted misleading photographs, videos, and statements on his social media accounts.[1] Love curated his

[1] Investigators have identified social media accounts on Instagram, TikTok, Facebook, and LinkedIn which appear to be controlled by Love and contain misleading photographs, videos, and statements regarding Love's association with the 49ers and NFL.

social media accounts to give the false impression he was a wealthy 49ers player. Love's social media accounts contained numerous photographs and videos of 49ers players exercising, traveling, and playing football. Love also posted videos or was tagged in videos from social media accounts belonging to other individuals and businesses in which he stated that he was a player for the 49ers. In many of the photographs and videos, Love wore 49ers clothing and gear, including what appears to be a replica 49ers football helmet.

10. Some victims became suspicious of Love and searched for Love's information through the Internet. Due to Love's false social media representations, search engines and artificial intelligence occasionally stated that Love was a bonafide 49ers player. In January 2026, investigators entered Love's first and last name in search engines and found that results did, in fact, sometimes depict Love as a player for the 49ers. Investigators observed similar Google search results on an Instagram social media account believed to be controlled by Love.

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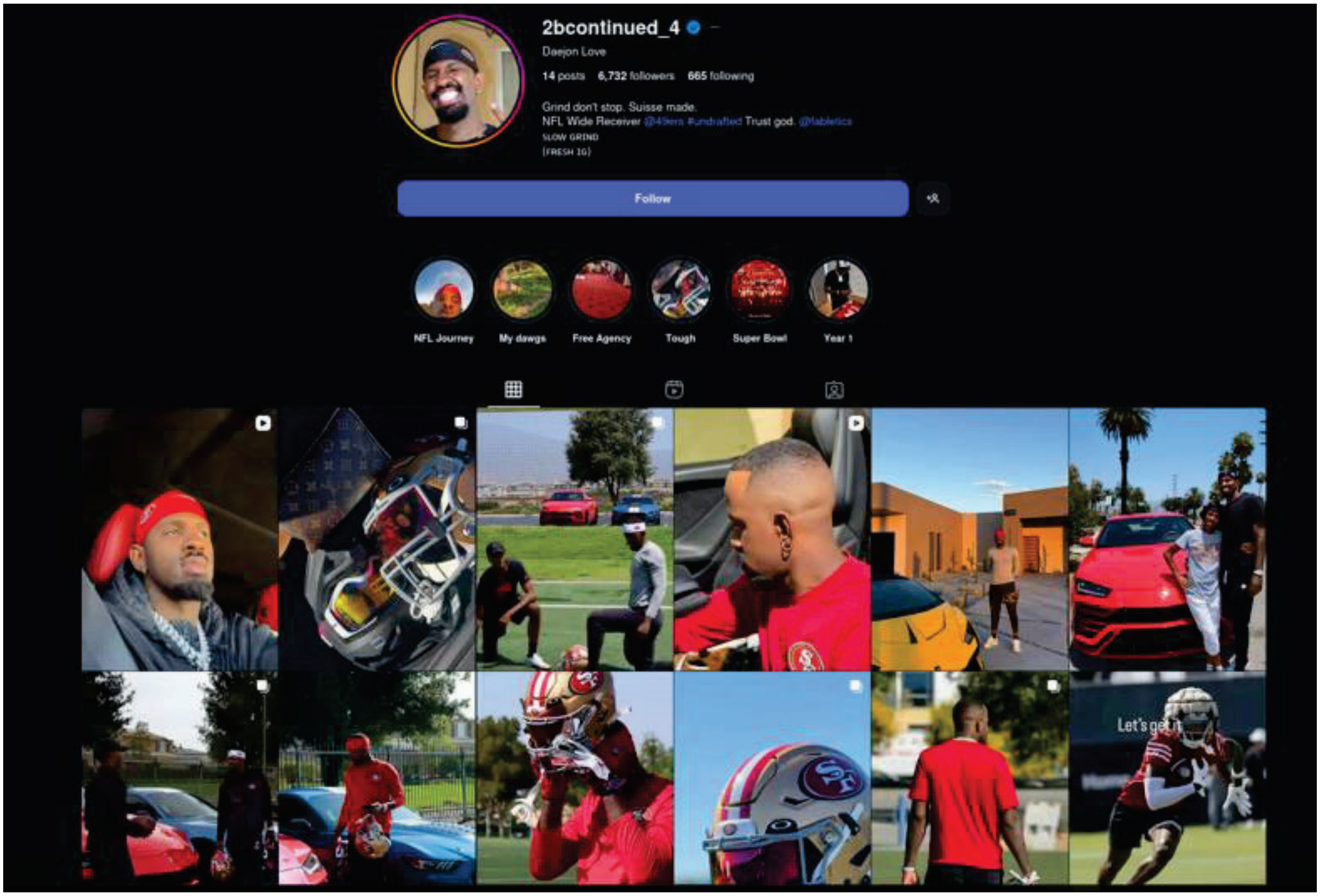
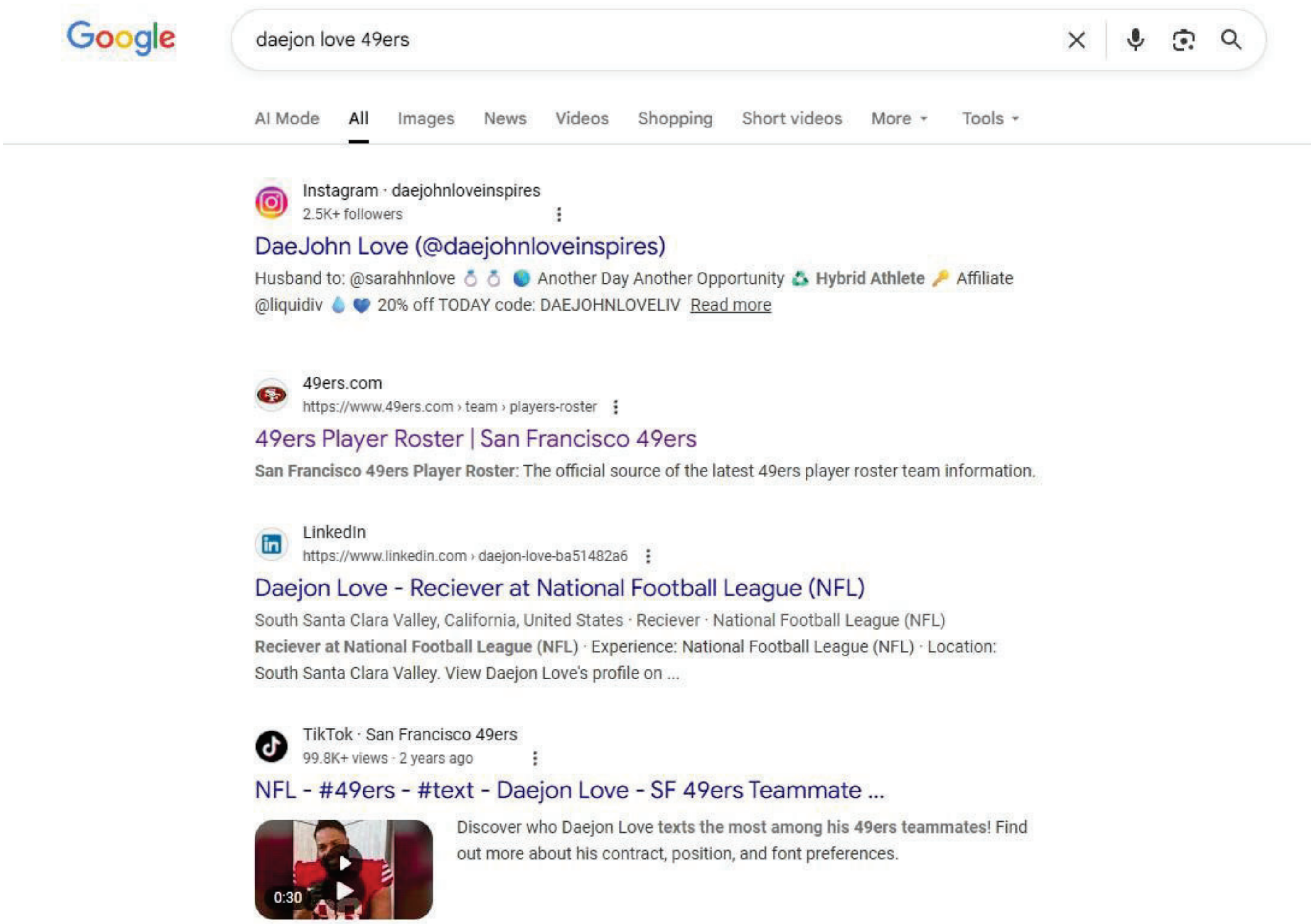
Screenshot of Love's Instagram account.
(March 2026)



Screenshot of Google search engine results for "Daejon Love 49ers" (January 2026)



Google

daejon love 49ers

AI Mode All Images News Videos Shopping Short videos More Tools

Instagram · daejohnloveinspires
2.5K+ followers

DaeJohn Love (@daejohnloveinspires)

Husband to: @sarahhnlove 💍 💍 🌎 Another Day Another Opportunity ♻️ **Hybrid Athlete** 🔑 Affiliate @liquidiv 💧 💙 20% off TODAY code: DAEJOHNLOVELIV Read more

49ers.com
https://www.49ers.com › team › players-roster

49ers Player Roster | San Francisco 49ers

San Francisco 49ers Player Roster: The official source of the latest 49ers player roster team information.

LinkedIn
https://www.linkedin.com › daejon-love-ba51482a6

Daejon Love - Reciever at National Football League (NFL)

South Santa Clara Valley, California, United States · Reciever · National Football League (NFL)
Reciever at National Football League (NFL) · Experience: National Football League (NFL) · Location: South Santa Clara Valley. View Daejon Love's profile on ...

TikTok · San Francisco 49ers
99.8K+ views · 2 years ago

NFL - #49ers - #text - Daejon Love - SF 49ers Teammate ...

0:30

Discover who Daejon Love **texts the most among his 49ers teammates!** Find out more about his contract, position, and font preferences.

11. As part of the scheme, Love created fictitious bank and investment account balances by using phone applications such as Fake Bank Account Pro, which allow users to create and edit fictitious bank account balances. Love showed his victims these fictious balances to deceive them into believing he was extremely wealthy. In at least one instance, Love falsely claimed to a victim to have a bank and investment account balance of over $30 million.

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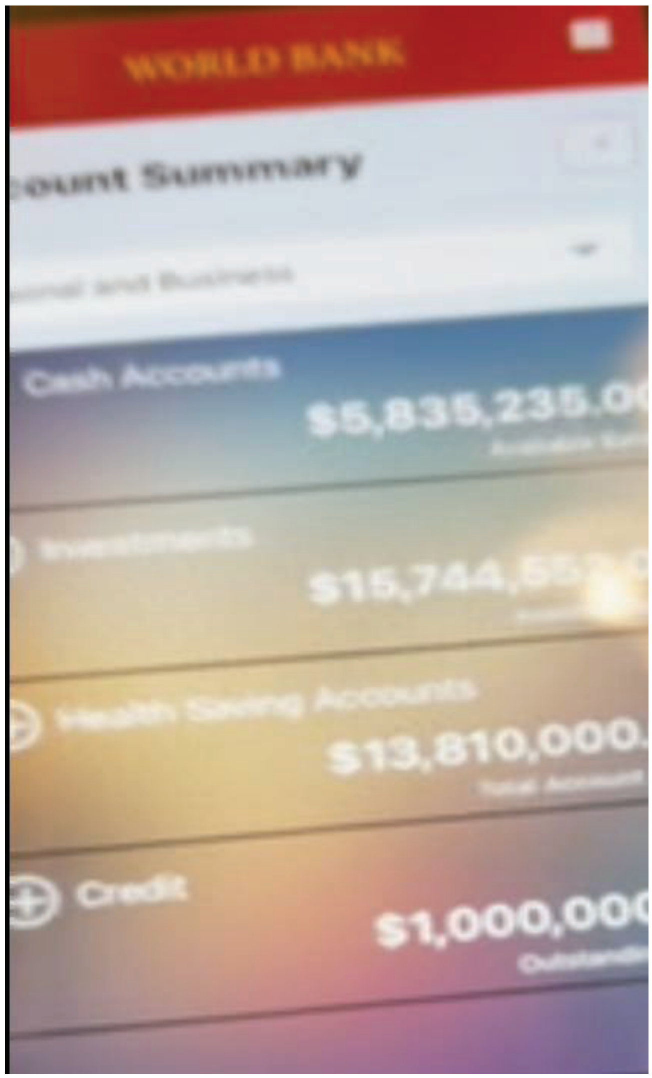
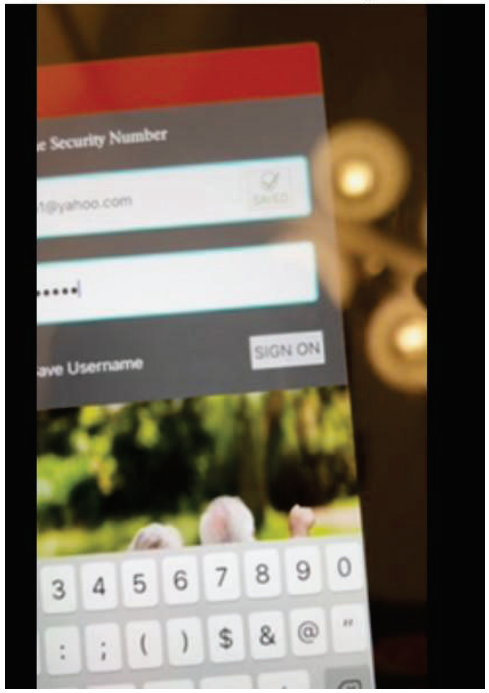
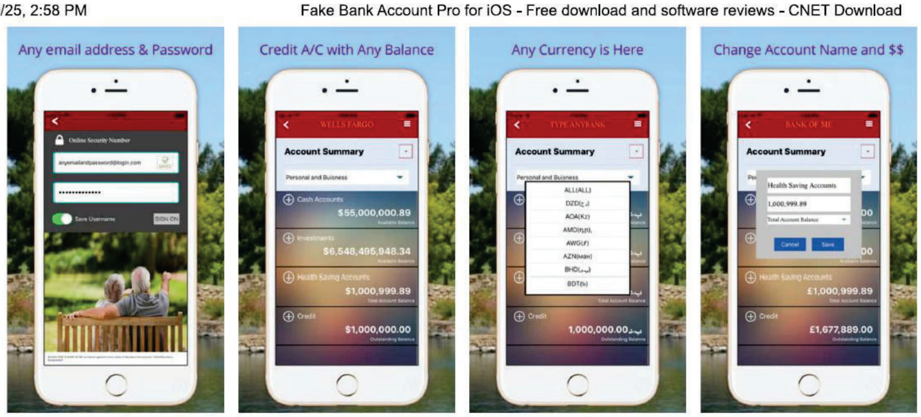
Screenshot taken from a video sent by Love to victim J.M. showing Love's account balance at over $30 million.





Screenshot taken from a video sent by Love to victim J.M. showing Love's login screen for Love's alleged bank account. Investigators believe the application is Fake Bank Account Pro. Pictured below is a screenshot from the Fake Bank Account Pro website obtained by Investigators from an Internet search.

6/9/25, 2:58 PM Fake Bank Account Pro for iOS - Free download and software reviews - CNET Download



Developer's Description

By ChristApp, LLC

The best Fake Bank Account ever.

12. Love and Chan both falsely claimed that Chan was Love's financial adviser and that Chan could invest the victims' money in the same investments Love was involved with. Love sometimes introduced the victims to Chan via FaceTime. Chan then sent Love screenshots of Love's purported investment account balance and gains. Love sometimes showed victims these screenshots, and falsely purported that they reflected gains he made on investments he made through Chan. In at least one instance, Love falsely claimed that since he began investing with Chan, Love increased his net worth from $300,000 to $17 million in a matter of a few years. Love claimed to some victims that since he had large investments with Chan, Chan would agree to invest the victims' money using the same fictitious "algorithm" that Chan used to invest Love's money. Love then offered to invest the victims' money along with his own money.

13. Love told some victims they would receive access to their investment account and a debit card they could use to withdraw their investment at any time. Love claimed they would only have to wait a few days for the account to be created.

14. Love asked some of the victims to give him cash or transfer money to either Love, Chan, or other associates via various online money transfer services, such as Apple Pay, Zelle, or Venmo. When some victims sent money to Love, Love claimed he would transfer it to Chan to invest.

15. Thus far, investigators have identified 26 victims who sent either Love or Chan money believing the money was being invested on their behalf. In making their payments, the victims relied on the false personas Love and Chan projected, including that Love was an NFL player, wealthy Swiss real estate developer, and that Chan was Love's financial adviser who managed millions of dollars for Love in successful investments.

16. The servers for Apple Pay are located in California and Nevada. Victims G.H., M.F., R.C., and S.G. were all located in Oregon when they used Apple Pay to transfer their investment funds to Love or Chan.

17. If some of the victims did not have cash available to invest, Love helped them take out personal loans. Love coached some victims on how and where to take out personal loans. Love reassured some of these victims they would be able to pay back their loan before the first payment was due.

18. Pocket Option is an online trading platform that allows users to trade securities. In addition, Pocket Option features a "demo" version which users to use fictitious funds to trade in real market conditions. This allows the users to learn how trading works and practice trading strategies. Because the funds are fictitious, gaining or losing money in the market provides no economic benefit or harm while using the demo version. Love falsely claimed that he and Chan created investment accounts on some victims' behalf. Love showed some of his victims screenshots of fictitious account balances from Pocket Option and falsely claimed those balances reflected the increased value of their investment to gain their trust. The screenshots included information investigators believe Love input himself, such as victims' names and email addresses. However, Love showed the same fictitious account identification number to several victims.

19. If victims put money towards Love and Chan's initial scheme, Love and Chan sometimes solicited additional money from them by introducing a new fictitious investment Love referred to as an "expedited account." To affect this part of the scheme, Chan sent Love messages about this account, claiming the account was not frequently available and Love and the victim had a rare opportunity to invest. Love then shared screenshots of Chan's messages and told victims he

was planning on investing his own money in the "expedited account" while claiming he had previously done so without ever losing money.

20. Love told some victims that funds invested in "expedited accounts" were for businesses which needed immediate cash for a short period of time. In return, the businesses supposedly paid a large fee or interest rate for the cash. Love promised the victims the "expedited account" would double or triple the value of their investment, usually within a week to ten days.

21. Love compared the "expedited account" to stocks, bonds, 401ks, and real estate investment trusts. If a victim asked Love why he chose not to invest in more conventional assets, Love claimed that wealthy individuals like himself did not invest the same way as the average person.

22. Once victims had no more money to invest, or if they asked too many questions regarding the investment or related documentation, Love blocked communications with them, but kept their money.

23. Investigators identified numerous electronic communications between Love and Chan regarding their scheme. In their communications, Love and Chan frequently referred to victims using derogatory language, sometimes calling victims "ugly" and "bitches," reflecting their intent to defraud the victims. In one message regarding a victim Love told Chan, "Shit. I ain't did shit with him or her. Whoever it is I need the cash. No issues with taking money from a Man." Love further asked Chan, "Would you talk to a tranny for 12k?"

24. Investigators also identified electronic communications between Chan and an associate regarding Love and Chan's scheme. In two messages Chan stated that "these are girls that's like very ugly or alright looking who got some bread" and "a lot of the pretty girls [Love]

said be broke."

25. Of the victims identified and interviewed, none reported having received any proceeds, returns on their principle, or investment account information, after sending Love and Chan money.

26. Victims have reported Love and Chan's scheme to multiple police departments in Oregon and California, but Love and Chan have yet to be prosecuted for conduct related to their investment scheme.

Victim Accounts

27. Investigators have identified [2] 26 women who Love and Chan defrauded or attempted to defraud. Investigators have also identified additional potential victims through financial analysis of Love's accounts. Investigators interviewed numerous victims. Below are some of their statements[3]:

Victim M.R.

28. M.R. met Love on the Facebook Dating online dating platform around February 2022, and the two continued communicating via text messages, Instagram, phone calls, and FaceTime calls until around December 2023.

29. Within a few days of matching on Facebook Dating, Love told M.R. she should invest $10,000 with Chan. M.R. told Love she did not have $10,000. Love then told M.R. to take

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[2] Investigators confirmed Love and Chan's identities through analysis of phone numbers, social media accounts, photographs, and videos Love and Chan provided to victims. I have compared the individuals in the videos and photographs produced by some of the victims and confirmed they are the same individuals depicted in paragraph 6 of this affidavit.

[3] The identities of all victims referenced in this affidavit are known to investigators. Their initials are being used to preserve their privacy.

out a personal loan of $7,000 to $8,000 to invest and told her that in three to four months her investment would increase to $50,000 or $60,000.

30. M.R. applied for a loan but was denied. Love then told M.R. he talked to Chan about a different type of investment Love referred to as an "expedited account." Love asked M.R. to borrow $5,000 from a friend and invest the money in the account. Love guaranteed that in three to five days, the money in M.R.'s account would double.

31. M.R. did not invest any money with Love or Chan.

Victim A.T.

32. A.T. met Love in June 2022 and dated Love until April 2023. Love presented himself as a wealthy real estate investor. After dating for approximately one month, Love told A.T. that Chan could invest her money in an "expedited account" that would double A.T.'s money and A.T. would receive a $600 check every week or two. A.T. transferred $20,000 to Love's Chase account, gave Love $20,000 in cash, and sent an associate of Love's $5,000 for a total of $45,000 towards the "expedited account." However, A.T. never received any of the $600 checks Love promised.

33. Love showed A.T. what he purported to be account statements that showed A.T.'s investment growing. Whenever A.T. asked about the lack of the $600 checks, Love created excuses for the delay.

34. A.T. later loaned Love an additional $19,500 after Love stated he needed the money to help his family. Eventually, Love repaid A.T. $13,800 of the loan through an associate of his.

35. Around January 2023, Love asked A.T. to help him lease a $250,000 McLaren sports car. A.T. did not have the income to support leasing the vehicle, so Love had a fake payroll

check made for A.T. which showed A.T. making approximately $50,000 per month. A.T. presented this payroll check to the dealership to help secure the lease. Love leased the McLaren with $20,000 in cash, a $15,000 check, and a $5,000 charge to A.T.'s credit card. After making two monthly payments, A.T. realized she was being scammed. Love returned the McLaren to A.T., who then returned the car to the dealership. A.T. paid $30,000 to break the lease.

36. In sum, A.T. lost $87,500.

Victim I.H.

37. I.H. met Love in person around July 2023. Love wore a 49ers jersey when they first met. Love told I.H. he could help her find an apartment, but Love needed I.H. to give him $7,000 to secure it. Love told I.H. he would be holding the money but I.H. could have it back when needed. I.H. sent Love $7,000 via Apple Pay.

38. Love did not find an apartment. When I.H. asked about the apartment, Love provided I.H. with various explanations as to why he had not secured one. I.H. learned that Love was a scammer on the Instagram social media platform and asked Love for her money back. Love did not return any of I.H.'s money.

Victim N.W.

39. N.W. met Love on the Hinge online dating platform around August or September 2023. Love told N.W. that he played for the 49ers and signed a "private contract."

40. Love asked N.W. to borrow money to purchase a Mercedes. Love showed N.W. a video of cash and jewelry Love had to pay N.W. back as collateral. N.W. loaned Love money on multiple occasions due to their relationship. N.W. gave Love a credit card of hers to use for emergencies. Love used it for personal expenses. Love also used N.W.'s other credit cards and

used it to purchase airline tickets.

41. N.W. loaned Love approximately $30,000 from when they met until January 2024. N.W. asked Love to pay back or sign an agreement he would pay back the $30,000. Love did not sign anything.

42. N.W. did not receive any funds from Love.

Victim G.H.

43. G.H. met Love in January 2024 via multiple online dating platforms. Love told G.H. his name was Brii'jon and that he was a wealthy real estate investor. Love and G.H. met in person for the first time in December 2024. Love told G.H. he wanted them to speak to his financial adviser, Chan, who could help invest their money.

44. Love, Chan, and G.H. had a video call about investment opportunities. During the call, Chan told G.H. he would invest her money in a real estate investment trust. Chan told G.H. she would receive $300 to $400 per day in gains at the beginning, but that amount would eventually grow to $1,000 per day. Love and Chan told G.H. she would get a debit card she could use to withdraw her gains.

45. G.H. sent $8,000 via Apple Pay to Chan and gave Love $2,000 in cash. Love then showed G.H. a screenshot of a FaceTime video with Chan showcasing what appeared to be G.H.'s $10,000 investment growing to $10,453 in a matter of days.[4]

46. After G.H. made her initial investment, Love told G.H. that Chan had a new investment opportunity called an "expedited account" which would triple G.H.'s investment in

[4] The screenshot included G.H.'s name, email address, a fictitious account identification number, and an IP address. The screenshot Love showed G.H. appears to be consistent with the Pocket Option trading platform and displays the same fictitious account identification number shown to other victims.

nine days. Love stated Chan was going to invest Love's money in the account and Love wanted G.H. do to the same. Love told G.H. she needed to use additional funds to invest in the expedited account.

47. G.H. refused to invest more money with Love. Love later learned that G.H. had an additional $10,000 in savings and physically threatened to harm G.H., prompting her to get a restraining order against Love.

48. G.H. never received any money from Love or Chan.

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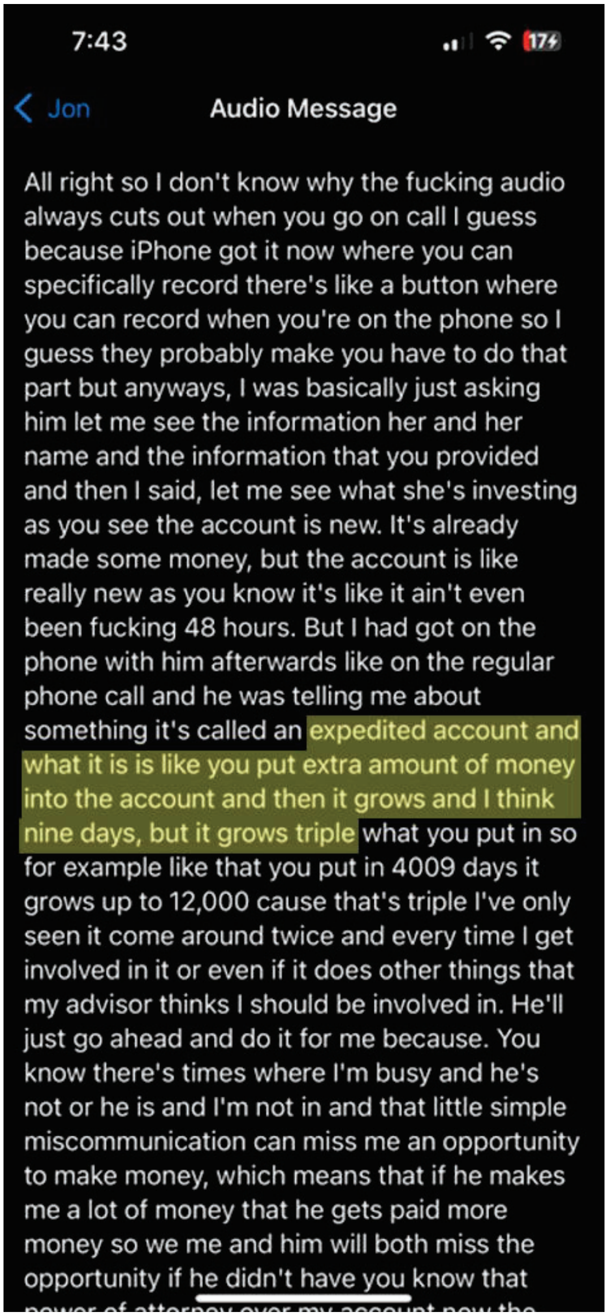
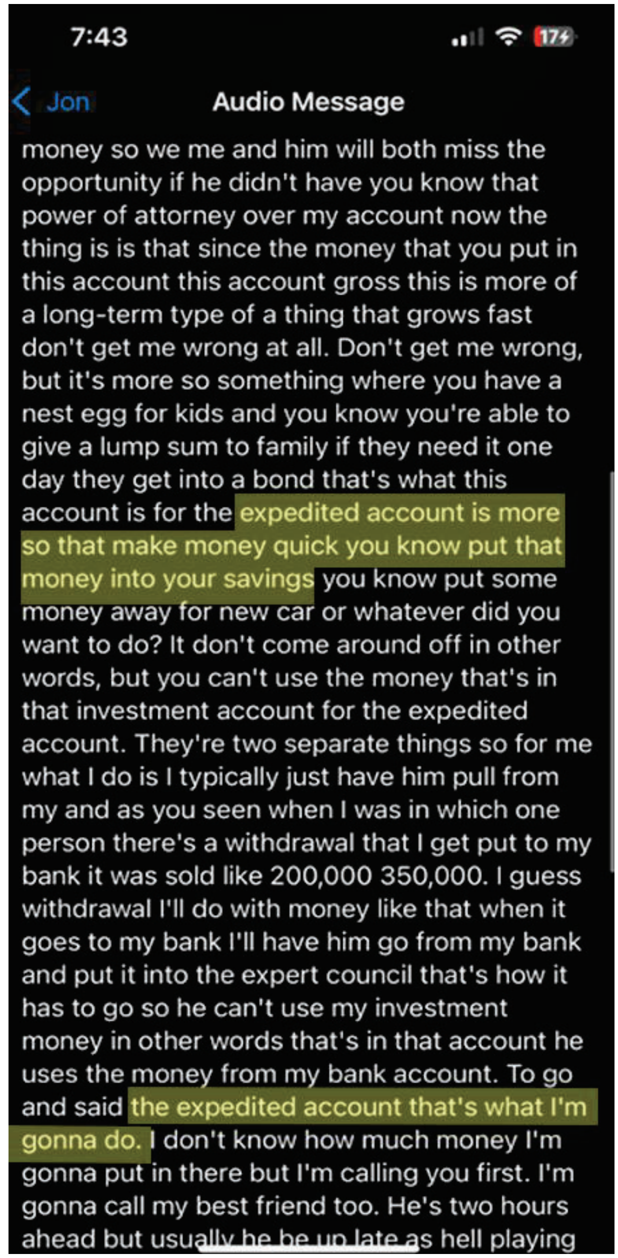
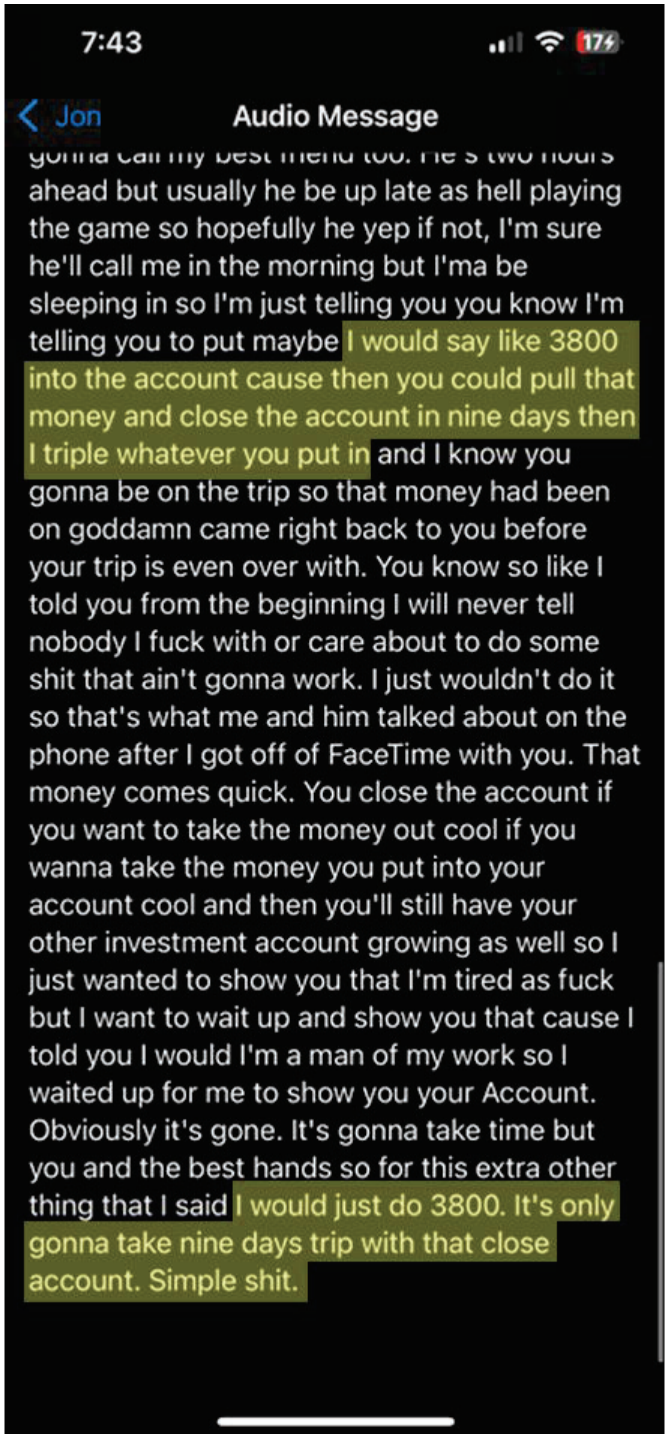




Voice Memo sent by Love to G.H. via iMessage in which Love describes the "expedited accounts" scheme.



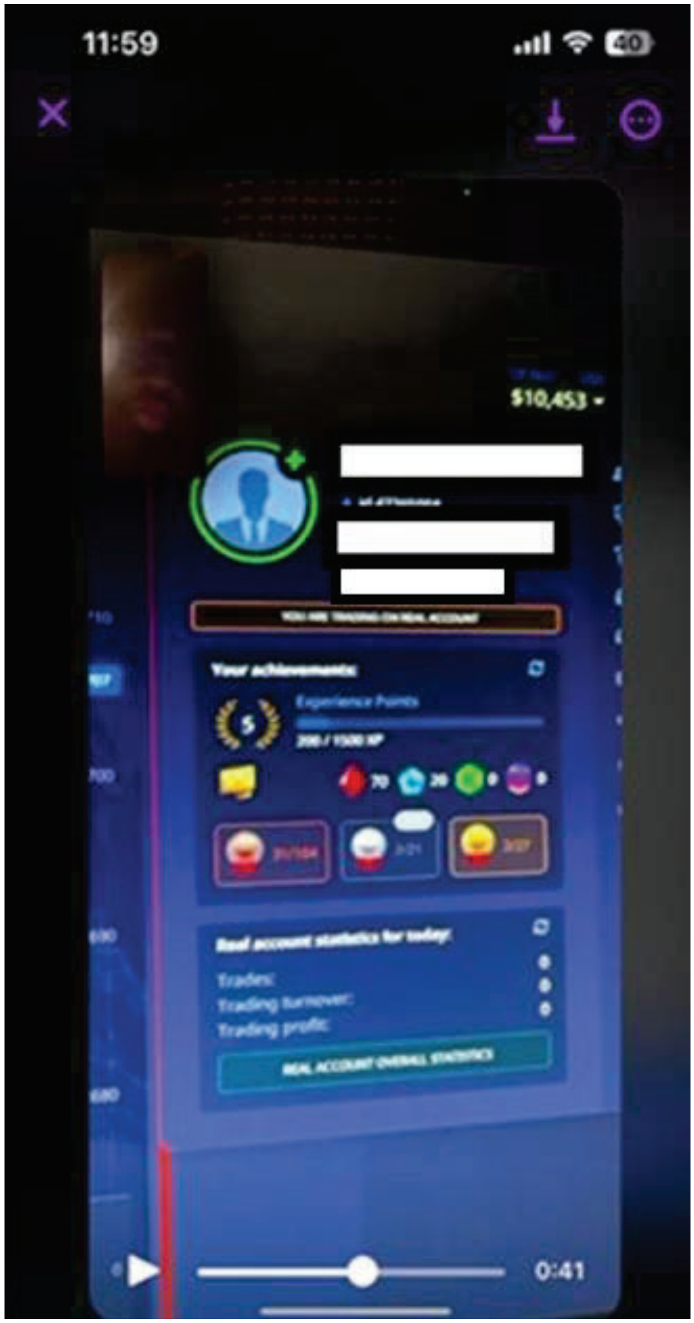
7:43

Jon

Audio Message

gonna call my best friend too. He's two hours ahead but usually he be up late as hell playing the game so hopefully he yep if not, I'm sure he'll call me in the morning but I'ma be sleeping in so I'm just telling you you know I'm telling you to put maybe I would say like 3800 into the account cause then you could pull that money and close the account in nine days then I triple whatever you put in and I know you gonna be on the trip so that money had been on goddamn came right back to you before your trip is even over with. You know so like I told you from the beginning I will never tell nobody I fuck with or care about to do some shit that ain't gonna work. I just wouldn't do it so that's what me and him talked about on the phone after I got off of FaceTime with you. That money comes quick. You close the account if you want to take the money out cool if you wanna take the money you put into your account cool and then you'll still have your other investment account growing as well so I just wanted to show you that I'm tired as fuck but I want to wait up and show you that cause I told you I would I'm a man of my work so I waited up for me to show you your Account. Obviously it's gone. It's gonna take time but you and the best hands so for this extra other thing that I said I would just do 3800. It's only gonna take nine days trip with that close account. Simple shit.

Voice memo sent by Love to G.H. via iMessage in which Love describes the "expedited accounts" scheme.



Screenshot Love sent to G.H. of G.H.'s alleged investment account on Pocket Option. Portions including victim G.H.'s personally identifiable information has been redacted to protect her privacy.

Victim S.G.

49. S.G. met Love on the Facebook Dating online dating platform around March 2024. Love told S.G. he was a player for the 49ers. Love told S.G. that he and Chan could help invest her money and instructed S.G. to open an investment account. Love told S.G. that she would receive a username and password for the account and S.G. would be able to log in and withdraw cash. Love told S.G. that her investment would double. S.G. sent Love $7,500 over multiple payments via Apple Pay. Love showed S.G. a screenshot of what he purported to be her account from a FaceTime call between Love and Chan. The funds in the account appeared to have grown to $7,543.89.[5]

50. Love stopped speaking with S.G. after she sent him money, however, in December 2024 Love messaged S.G. on the Snapchat social media platform. S.G. asked Love about her money and Love stated he messed up and wished to right his wrong. S.G. did not receive any funds from Love or Chan.

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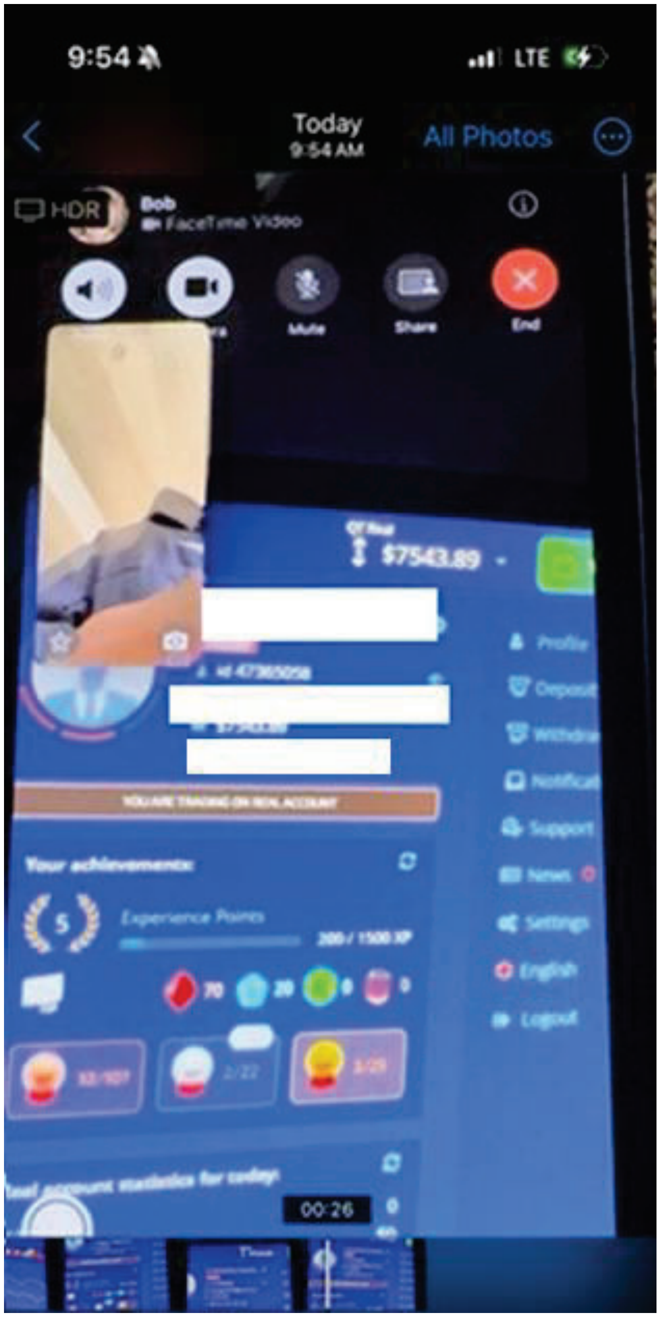
[5] The screenshot Love used appears to be from the same Pocket Option platform and have the same account number as the account shown to G.H. However, the balance was different and S.G.'s name appeared as the account holder.



Screenshot Love sent to S.G. of S.G.'s alleged investment account on Pocket Option. Portions including victim S.G.'s personally identifiable information have been redacted to protect her privacy.

Victim M.F.

51. M.F. met Love on the Bumble online dating platform in August 2024. Love told M.F. he was from Switzerland and was in the area to look for properties for his family's real estate business. Love also claimed to be a wide receiver for the 49ers and kept a 49ers helmet in his car.

52. Love told M.F. that Chan handled his investments, and Chan could invest her money as well. Love told M.F. the money was going towards an investment that would double her money.

53. M.F. made multiple Apple Pay transfers and a Western Union transfer to Love totaling $18,000 in August 2024. M.F. took out multiple personal loans to fund what Love led her to believe were investments.

54. On August 28, 2024, M.F. received an Instagram message from victim I.H in which I.H. told M.F. that Love was scamming her. M.F. then sent multiple Apple Pay payment requests to Love. M.F. did not receive any funds from Love or Chan.

Victim J.M.

55. J.M. met Love on the Bumble online dating platform in September 2024. Love told J.M. he was from a wealthy family in Switzerland, played football for the 49ers, and showed J.M. his alleged bank account which showed a balance of over $30,000,000.

56. After Love and J.M. went on several dates, Love told J.M. that his financial adviser, Chan, could help J.M. invest and create the financial security to quit her job. Love stated he started investing with Chan with an initial $300,000 which grew to $17,000,000. Love also stated that there was a new investment opportunity called an "expedited account" that J.M. could invest in and double or triple her investment in three months.

57. J.M. invested $4,000, sending the money via Apple Pay to Love. J.M. asked Love for account information but never received any.

58. After J.M. expressed concerns about the investment, Love held a FaceTime call with Love, Chan, and J.M. During the call, Chan displayed what appeared to be Love's account which showed a large sum of money. Chan then suggested J.M. invest another $2,000 and that J.M. could withdraw the $2,000 in a couple of days. J.M. was hesitant, and Love offered to match J.M.'s $2,000 with $2,000 of his own money. J.M. invested another $1,500 and Love supposedly matched it with $1,000.

59. Love then showed J.M. a video of her alleged account with a balance of $6,964.23. Love stated J.M. had already made a sizeable profit. Love then suggested J.M. take out a loan of $4,000 to $5,000.

60. J.M. became suspicious of Love and asked for some of their investment back but Love stopped communicating with J.M.

61. J.M. never received any investment account documents or funds from Love or Chan.

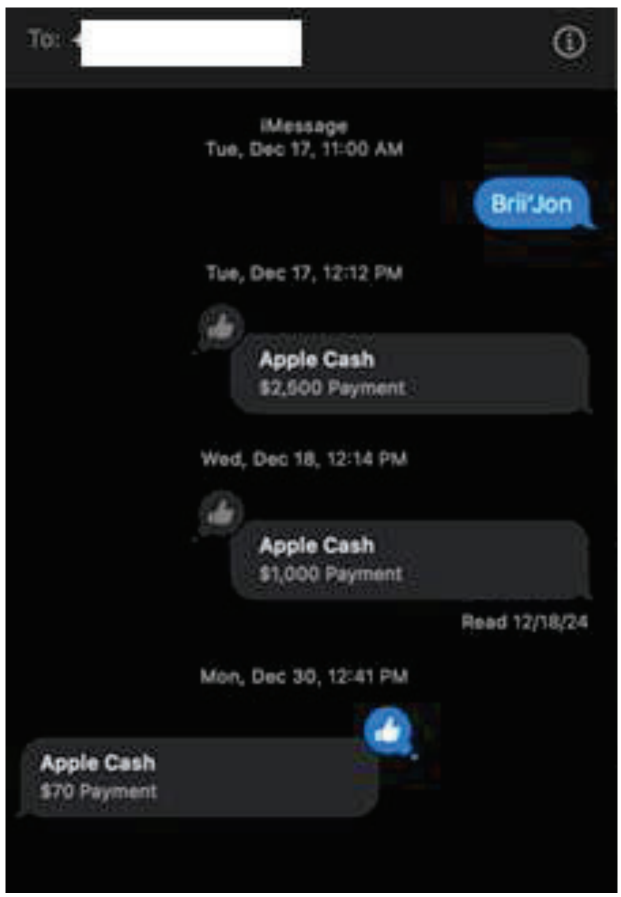
Victim R.C.

62. R.C. met Love on the Tinder online dating platform in December 2024. Love told R.C. his name was Brii'Jon Love. Love told R.C. he was from Switzerland and worked for his father's company. Love also claimed to be a member of the 49ers and have a bank account worth $18,000,000.

63. Love told R.C. he wanted to start a family with her, but needed to know her yearly income, monthly bills, and credit score. Love then offered to have Chan invest R.C.'s money. Love

told R.C. he had started investing with Chan three years before with an initial investment of $300,000 and he was now worth millions of dollars.

64. Love then told R.C. about a new investment called an "expedited account." Love told R.C. her investment would triple in ten days if R.C. invested in the account. Love stated he had invested in the "expedited account" twice in the last five years and had not lost money. R.C. invested $7,000 via cash and online transfers, including $3,500 sent to Love and $3,500 sent to Chan via Apple Pay.



Apple Pay transfer R.C. made to Chan.

65. Love asked R.C. to purchase a car for him. Love told R.C. that Chan advised against Love purchasing a car at that time due to future investments Love intended on making in Russia. R.C. did not have the income to purchase a car so Love created fake paystubs for R.C. from a company based in Georgia. R.C. (see image below). R.C. then used those paystubs to purchase a car for Love and herself.

66. Neither Love nor Chan sent R.C. any money from what R.C. believed was her $7,000 investment. Love continued to make payments on the car that R.C. purchased.

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Front Page VIP

January 6, 2025

Pay Two Thousand Two Hundred Forty Dollars And Seventy-four Cents

$ 2,240.74

This is not a check

Pay to the order of

Front Page VIP

Earnings Statement

Employee Information	Social Sec. ID	Employee ID	Start Date	End Date	Check Date
			12/23/2024	01/05/2025	01/06/2025

Earnings	Rate	Hours	Current	Year to date	Deductions	Current	Year to date
Regular Income	38.00	80	3,040.00	82,080.00	Federal Income Tax	346.26	9,349.02
					Social Security	188.48	5,088.96
					Medicare	44.08	1,190.16
					Oregon State Tax	217.40	5,869.80
					Oregon Transit Tax	3.04	82.08
Gross Earnings			3,040.00	82,080.00	**Gross Deductions**	799.26	21,580.02

Fake payroll stub Love created on R.C.'s behalf. Personally identifiable information has been redacted.

Victim A.A.

67. A.A. met Love on the Tinder online dating platform in March 2025. Love claimed to be wealthy and was in Oregon to build a house in Ashland. Love claimed to be a wide receiver for the 49ers and stated he was related to Jordan Love, quarterback of the Green Bay Packers.

68. After the first date, Love asked A.A. about her financial situation and if she was interested in investing. While A.A. was in Love's physical presence, Love hosted a video call with Love's purported financial adviser, Chan. Chan and Love showed A.A. Love's purported investment accounts, which they claimed were worth millions of dollars. Love told A.A. if she agreed, Chan would invest her money with Love's money. Love further stated A.A.'s investment would double or triple in value within ten days. After this happened, Love said he would deposit the money back in A.A.'s account.

69. A.A. did not have cash on hand for the investment and took out two loans worth $17,200 before sending the money to Love. A.A. did not receive any confirmation of the investments. When A.A. asked Love about the investments, Love stopped communicating with her.

70. A.A. never received any funds from Love.

FBI Confidential Human Source (CHS)

71. CHS met Love in May 2025 via an online dating platform. Love told CHS his name was Avril Lyto Love. Love told CHS that he was from a wealthy family in Switzerland and invested in commercial real estate. After a few dates, Love spoke to CHS about investing. The fact that Love drove nice cars, had expensive jewelry, money, and stayed in nice hotels made CHS believe Love was wealthy. Because of Love's purported wealth, CHS was interested in investing

with Love but had a few questions before she did.

72. When Love would not give CHS answers to her questions, CHS realized Love was attempting to defraud them and contacted the FBI. At the direction of the FBI, CHS asked Love about Love's investments.

73. In June 2025, Love sent CHS a screenshot (see below) of a message between Love and Chan stating an "expedited account" was available. Love then sent CHS an audio message describing the account. Love stated that the account had only come around twice in six years and was different than the typical long-term investment accounts. Love claimed the "expedited account" would double or triple in value in a seven to nine days. After the account closed, Love stated CHS could withdraw all their money. Love stated he had invested in the "expedited account" twice prior.

74. Love stopped communications with CHS when CHS would not invest any money.

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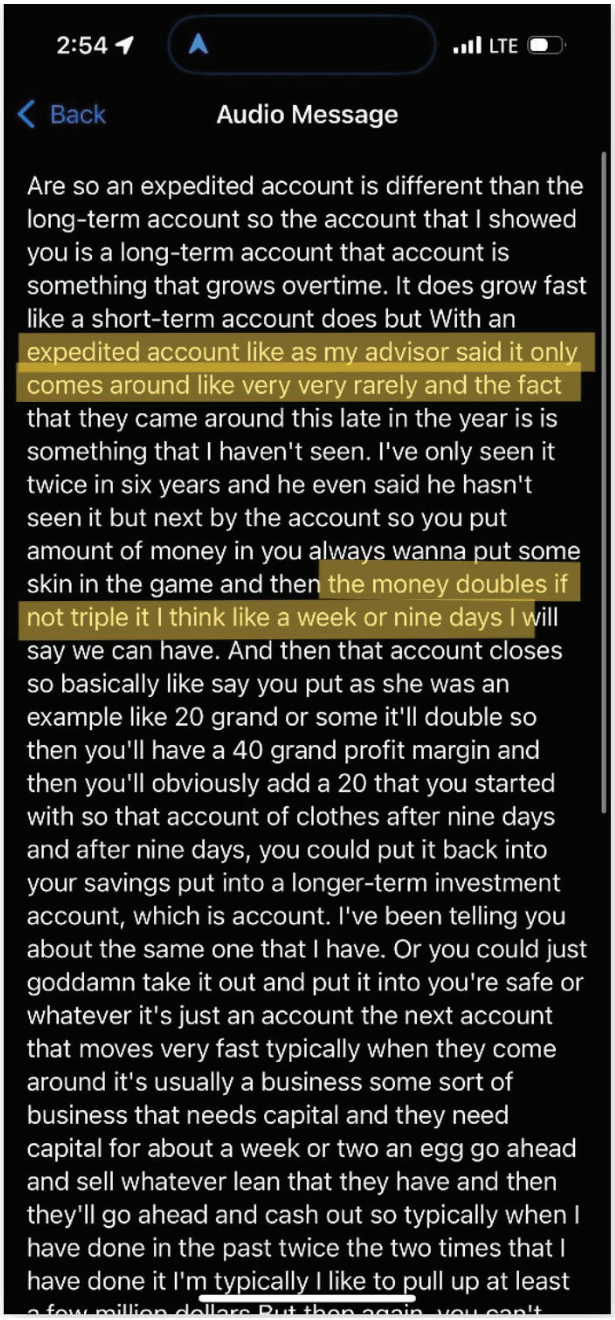

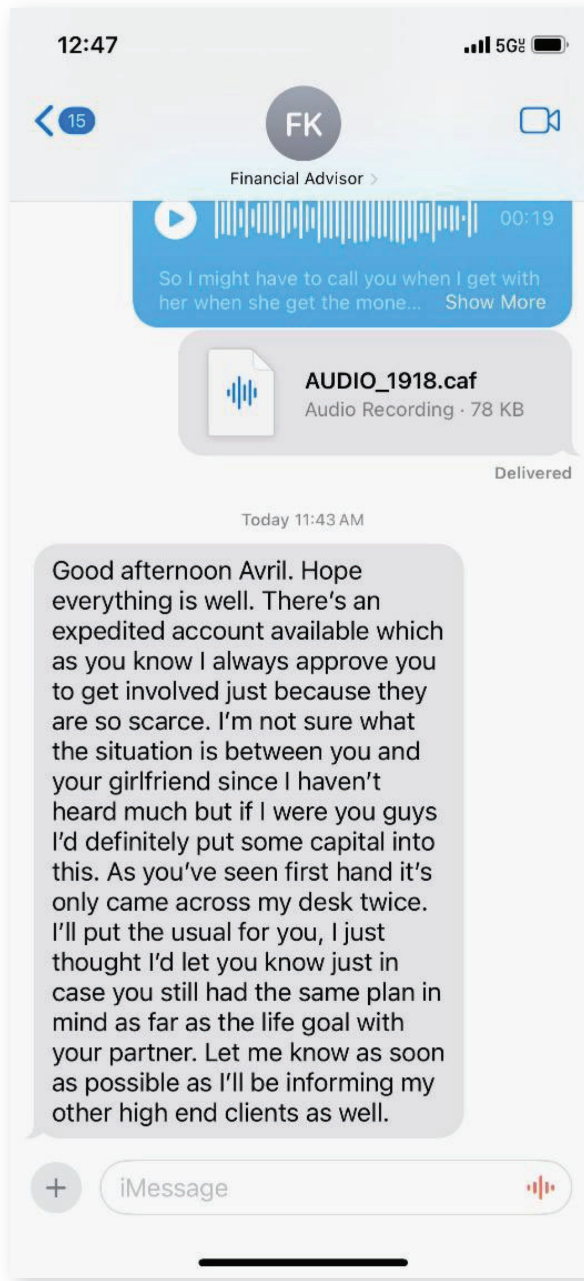

Left: Voice memo Love sent to CHS via iMessage and Right: Screenshot between Love and Chan describing an "expedited account."

Victim T.A.

75. T.A. met Love on the Bumble online dating platform in May 2025. Love told T.A. his name was Avril Love. Love told T.A. he was a successful investor and owned real estate. After several dates, Love told T.A. she should invest her money with Love's financial adviser, Chan. Shortly thereafter, Love, T.A., and Chan participated in a FaceTime call. The purpose of the call was for Love to prove to T.A. that he had money.

76. Love told T.A. her investment with Chan would double within one to two months, and she should see the first return within 30 days.

77. T.A. invested $15,000 in cash with Love. As collateral, Love gave T.A. a Rolex watch. T.A. believes the watch is counterfeit.

78. After making the investment, T.A. contacted Love asking for her money, but Love did not respond. T.A. told Love she would be filing a police report.

79. T.A. never received any funds from Love or Chan.

Victim B.S.

80. B.S. met Love on the Bumble online dating platform in August 2025. Love told B.S. his name was Avril Love. Love told B.S. he was from a wealthy family in Switzerland and was in the United States to purchase properties for his family's business. Love sent B.S. a video of what appeared to be Love's investment account, which was worth millions of dollars. Love told B.S. he recently purchased a house in Joshua Tree, California, and drove two Lamborghinis.

81. After several dates, Love sent B.S. a video of him and Chan speaking. Chan wanted B.S. to invest with him. Love told B.S. her money could be pulled out at any time with no penalties. B.S. met Love in person and gave Love $20,000 in cash for the investment. Days later, Love

showed B.S. her purported investment account via FaceTime and the balance appeared to have had grown to $21,000.

82. Love then told B.S. about a new account called an "expedited account." Love claimed to have only seen this investment twice in six years. On both occasions, Love claimed the "expedited account" doubled or tripled in value in approximately one week. However, Love told B.S. she could only use additional cash, not the cash she previously invested.

83. B.S. became suspicious and asked Love if he was scamming her. Love blocked B.S. and never responded.

84. B.S. never received any funds from Love.

Victim M.M.

85. M.M. met Love on the Tinder online dating platform in December 2025. Love told M.M. his name was Jordan Love and he was a wealthy real estate investor. M.M. believed Love was wealthy. M.M. observed Love driving a Mercedes G Wagon, wearing what appeared to be a large diamond necklace, and traveling with a bodyguard. Love also showed M.M. what he claimed was Love's personal investment account on Pocket Option; the account appeared to be worth over $19,000,000.[6]

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[6] Investigators observed the account identification number is the same identification number Love input in other victims' Pocket Option accounts.

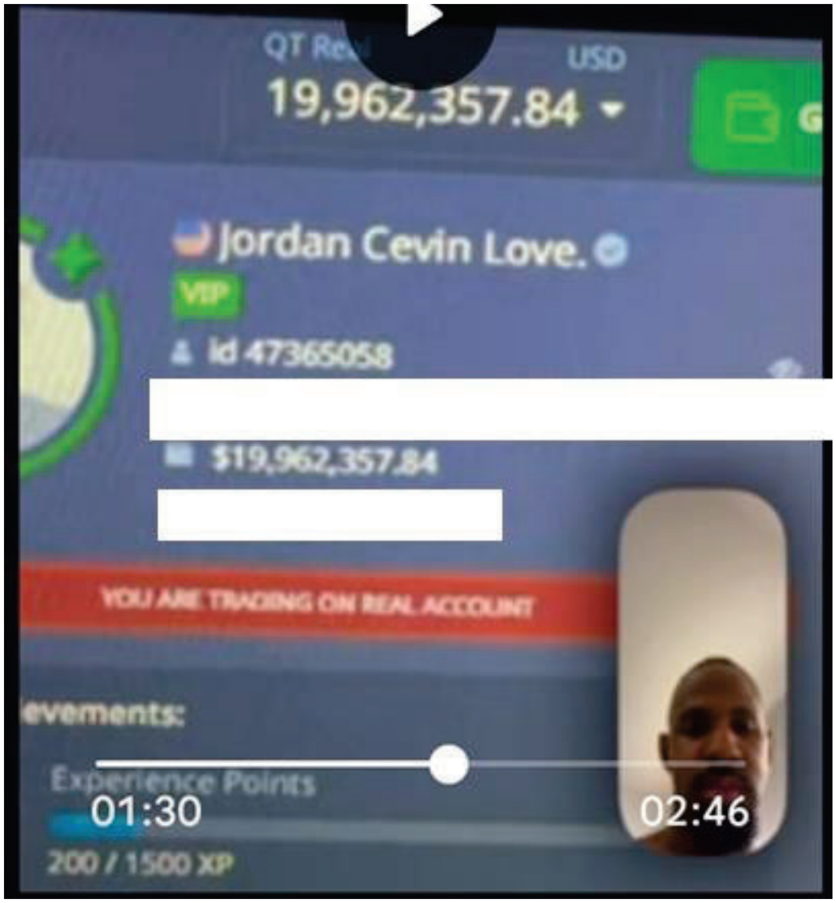


Image of Love's Pocket Option account sent to M.M. Note: Daejon Love's face is shown in this image.

86. Love told M.M. she should invest with his financial adviser, Chan. M.M. agreed and invested $10,000. M.M. met Love in person to give him a $10,000 cashier's check for the investment. A short time later, Love (using the alias Jordan) sent M.M. a screenshot of her account showing the investment made money. Love then told M.M. about an "expedited account" that would triple M.M.'s investment within a month or two. M.M. took out a loan for $31,000 and invested in the "expedited account." Later, when M.M. asked Love about her investment, Love stopped responding.

87. M.M. never received any funds from Love or Chan.

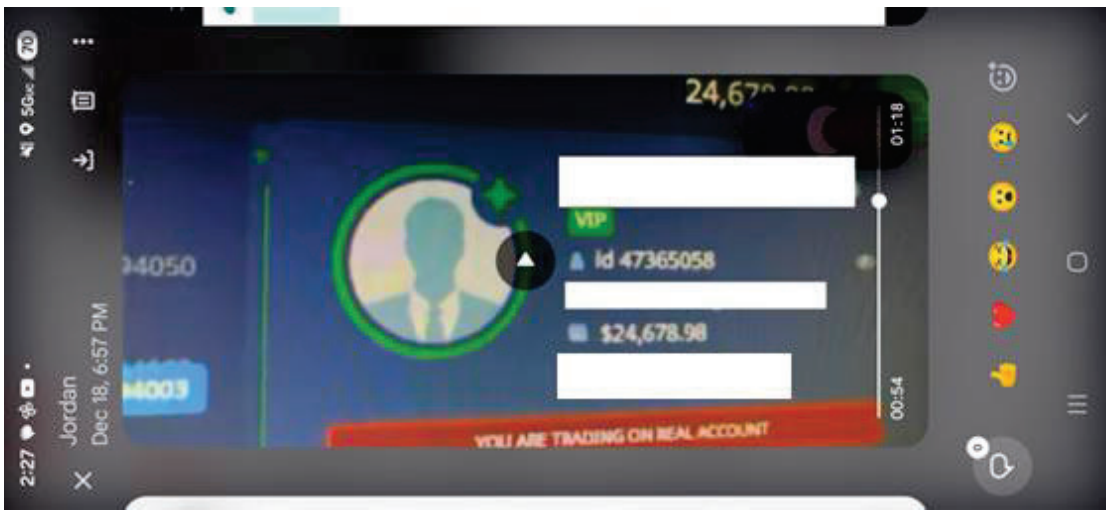


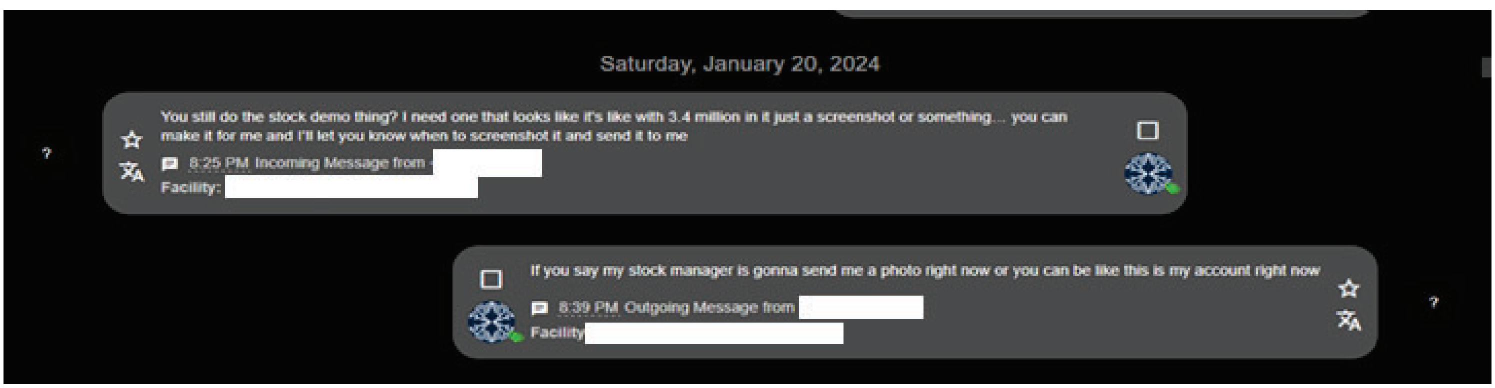
Image Love sent to M.M. of M.M.'s purported investment account on Pocket Option

Statements From the San Francisco 49ers and NFL Officials

88. Investigators interviewed representatives from both the NFL and the 49ers regarding Daejon Labrayae Love's affiliation with the 49ers and NFL at large. The representatives confirmed Daejon Labrayae Love has never been employed with the 49ers or the NFL.

iCloud Account Review

89. In May 2026, a search warrant was served for the iCloud accounts associated with Love and Chan. A review of the messages, videos, pictures, and voice notes revealed evidence of Love and Chan's conspiracy to commit wire fraud. Love, with Chan's help, meticulously crafted a fiction that he was legitimately wealthy, played for the 49ers, and created wealth through Chan, his purported financial adviser. Examples are referenced below.



90. In January 2024, Love messaged Chan asking Chan to create a screenshot of an account showing a balance of $3.4 million.

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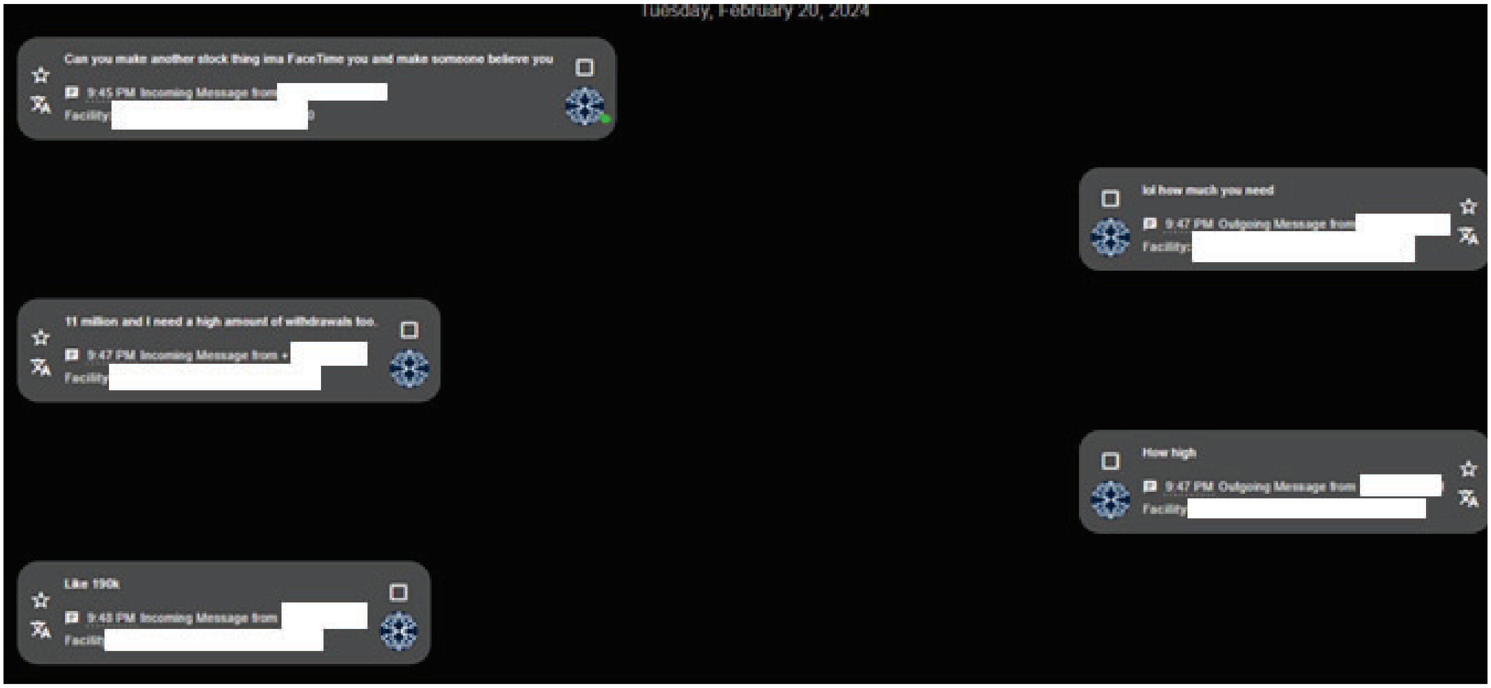
91. In February 2024, Love messaged Chan asking Chan to create a stock account appearing to be worth $11 million. Love also stated that he would communicate with Chan via FaceTime to "make someone believe [Chan]."



92. In March 2024, Chan messaged an associate that Love had money because he was "scamming these hoes." Chan told the associate that Love was a "vet manipulator." Chan asked if the associate remembered Pocket Options and stated that Love told the victims he can double or triple their investments. Chan then stated that the victims would take Love to court, but Love did not steal the money because the victims willingly gave it to Love. The associate told Chan that what Love was doing was fraud. Chan stated that, if confronted, Love would say he tried to invest it but lost the money.

93. In April 2024, Chan told the same associate that Love was about to get another $7,000 to $10,000 from another victim and Chan was a part of the plan acting as Love's money

manager. The associate asked if Chan received a cut of the money and Chan replied that Love "blessed" Chan with everything Chan needs.

94. In creating and maintaining the illusion that Love was wealthy and Chan was his financial adviser, sometimes Love directed Chan to send messages to Love in which Chan posed as Love's financial adviser. In doing so, Love used a different phone to message Chan, and Chan responded to the phone that Love was messaging victims on. Investigators believe Love and Chan communicated this way to obscure the fact that Chan was not Love's financial adviser, and to further legitimize their scheme. For instance, in June 2024, Love messaged Chan that Love would FaceTime him and Love would ask Chan about the best way to access a victim's money so Chan could invest it on the victim's behalf. Love instructed Chan to say over FaceTime that Chan had power of attorney authority over Love's account thereby allowing the victim's money to be deposited into Love's account via cash or cashier's check. Love told Chan to falsely claim over FaceTime that, due to Chan's authority, he had direct access to Love's account, which allowed Chan to access the victim's funds directly for investment. Love told Chan not to falter since there was "big money on the line." Chan agreed.

95. In May 2025, Love messaged Chan the following:[7] "The reason for the cash deposit from her to your account Avril is because I don't want to disrupt the algorithm with your investment account. Once you deposit the cash into your navy federal bank account I'll be able to continue the algorithm directly moving it into your investment account. If there's a transfer then I'll have to do more work on my end by a new entry of investment which I don't want to do. That's the reason why I suggested (and recommend) doing it this way." Based on my training, experience,

[7] Spelling and grammatical errors from the original message have been intentionally left intact.

and knowledge of this investigation, I believe this message was a sham meant to deceive a victim into believing they were sending money for a legitimate investment.

96. Love then directed Chan to copy that message and send it to Love's old phone. Chan did as instructed.

97. Love directed Chan to send a similar message once more in May 2025 and again in June 2025, and September 2025. Chan sent the messages each time. Love sent a screenshot of the September 2025 message to victim B.S., but mistakenly used the name Jordan instead of Avril (Love previously told B.S. his first name was Avril).

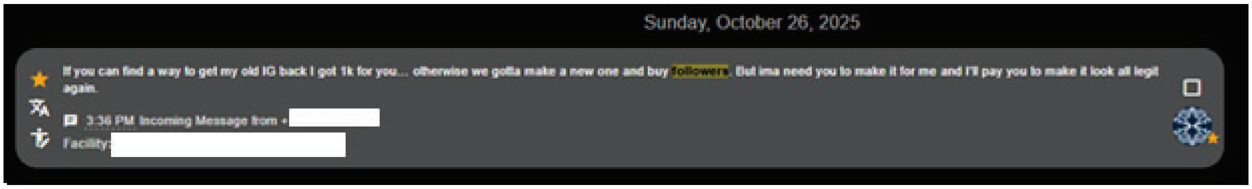
98. In June 2025, Love messaged Chan the following:[8] "Good afternoon Avril. Hope everything is well. There's an expedited account available which as you know I always approve you to get involved just because they are so scarce. I'm not sure what the situation is between you and your girlfriend since I haven't heard much but if I were you guys I'd definitely put some capital into this. As you've seen first hand it's only came across my desk twice. I'll put the usual for you, I just thought I'd let you know just in case you still had the same plan in mind as far as life goal with your partner. Let me know as soon as possible as I'll be informing my other high end clients as well."

99. Love directed Chan to send the above message to Love's other phone. Chan sent the message to Love's other phone as instructed.

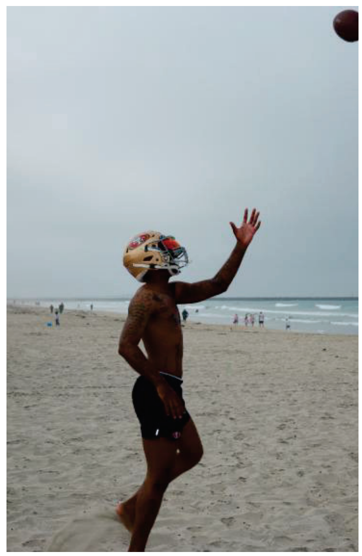
100. Some of Love's social media accounts have been deactivated by service providers due to complaints from victims. In response, Love has made numerous accounts and used different names. Love and Chan have also discussed making new social media accounts and

[8] Spelling and grammatical errors from the original message have been intentionally left intact.

purchasing followers to make the accounts appear to be legitimate.



101. Love’s iCloud accounts include numerous photographs and videos of Love wearing 49ers clothing and at least one 49ers helmet. Some videos and photographs depict Love appearing practice in 49ers gear.



Photographs from one of Love’s iCloud accounts depicting Love practicing in 49ers gear.

102. Investigators identified multiple screen recorded videos Love posted to his social media accounts which investigators believe depict legitimate NFL players and use content taken from their social media accounts. Some of these videos appeared on Love’s social media accounts with the original posters’ information removed. Love presented the videos as his own to convince victims that he was a player for the 49ers.

103. Additionally, Love shot a video where he is shown supposedly signing an

employment contract with the 49ers. In the video, Love wore extensive amounts of jewelry and claimed that he would be a wide receiver for the 49ers.

104. There are three videos investigators identified on Love's iCloud accounts that Love shared approximately 185 times, including with numerous victims. The videos appear to be shot at the same time in January 2023. Two of the videos depict Daejon Love wearing a 49ers jacket and the third video depicts Love's point of view in a residence Love claims to be his own. Love shows off his belongings, including luxury vehicles, clothing and vehicles, in this video.

105. In the first video, Love describes how he became an NFL player. Love states that he is friends with current and former NFL players Tyreek Hill, Antonio Brown, and John Brown. Love claims that since he exercised with these players during the offseason, he received invitations to try out with NFL teams.

106. During first video Love states, "San Francisco was the best team out of all of those teams and they offered me the most money. So, I'm like shit, San Francisco they in hunt of winning the Super Bowl every season, so I'm like I don't wanna play football for fucking two years and goddamn just be playing, just to fucking play. If imma play imma play to win. So right now, I go to every home game, umm, I'll probably go to home and away games since playoffs are about to start. I already made, did my signing bonus. I workout with the team, I go to the team meetings and all that other type of shit. So that is how I got involved in football. Now in the next video I'm going to explain what my family does, why I live in Cali, why I got bodyguards, how old I am, all that other type of shit. That way it all makes sense. And then I'll show you some shit just to give you more proof that I am who I say I am and I do, I have what I say I have."

107. Daejon Love states he ultimately signed with the 49ers and attends all home games, practices, and team meetings with the 49ers, and has received his signing bonus.

108. In the second video, Love claims that his family is from Switzerland and is involved in commercial real estate. Love claims his family is one of the richest families in Switzerland and that he is the vice president of international affairs for his father's company. Love further states that his family is the majority shareholder of three Gucci stores in the United States. Love explains his family's vast wealth allows him to employee three bodyguards and the personal chef.

109. In the third video, Love gives a tour of a house he claims is his own. Love shows a closet with apparent designer clothing and bags, a safe containing cash Love claims to be worth $200,000, and a watch Love alleges to be a genuine Richard Mille with a receipt showing a purchase price of $286,000. Love then logs into an account on his phone, which he alleges to be his bank account; the account shows a combined balance of over $30 million. [9]

<u>FBI Analysis of Love's Financial Records</u>

110. Investigators reviewed financial records in the name of Daejon Love and Daejon Love Enterprises from January 1, 2021, through June 30, 2025.

111. As part of the investigation, investigators obtained all known financial records associated with Love and Chan. An analysis of Love's financial records showed no identifiable source of legitimate, non-fraud income. The records showed no direct deposits or payroll check deposits from the 49ers or any other legitimate employer. Most of the funds coming into accounts

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[9] This appears to be the same fictious account balance Love showed to victim J.M.

associated with Love came from frequent cash deposits and online money transfers through peer-to-peer (P2P) applications such as Apple Pay, CashApp, Zelle, and Venmo. This is consistent with how Love and Chan directed victims to send them money.

112. Transactions within the P2P applications associated with Love included various payment memos, subjects, and notes. Some payments Love received through Venmo, Zelle, and CashApp included notes such as "investing," "investments," and "second installment for expedited stock." Some of those payments were later followed with payment requests and collection charges from the original sender (likely a victim) to Love. Some of the notes in the payment requests included statements and orders such as, "give me my money back," "3700 is owed to me. Legal actions will be pursued," and, "I really dont want to have to take you to court."

Funds Received by Daejon Love Time Period January 1, 2021 to June 30, 2025	
Source	**Amount Received**
Cash Deposits	489,879.00
Zelle	255,456.00
Apple Pay	254,071.09
CashApp	153,765.39
Bank/Credit Union Deposit	96,595.00
Misc Deposits	65,446.17
Venmo/PayPal	60,749.31
Total Amount Received	1,378,423.96

113. Roughly half of these funds were withdrawn in cash or sent through the same P2P applications Love received funds from. As detailed below, Love spent the remaining funds mainly on travel, entertainment, clothing and accessories, automobile care, and restaurants.

114. Love regularly stayed at hotels and Airbnbs on the West Coast. Love made purchases from Gucci, Louis Vuitton, Versace, and other luxury and designer retailers. Love also made purchases at jewelry stores and gold and coin shops.

115. Love made purchases investigators believe were made in furtherance of the scheme to defraud victims. Love spent over $1,160 at Green Gridiron, a website specializing in custom football helmets. Love purchased from Prop Money Inc., a company which sells realistic fake money for movies. Love also made purchases from Useviral.com and Buzzoid, companies that sell followers, likes, and views for social media accounts. Investigators believe these purchases were made to enhance Love's online appearance and alleged social standing in furtherance the scheme.

116. Investigators identified no genuine securities-related transactions in Love's accounts.

Funds Spent by Daejon Love Time Period January 1, 2021 to June 30, 2025	
Category	**Amount**
Cash Withdrawal	(478,353.19)
Travel/Entertainment	(237,177.62)
P2P	(204,847.91)
Food/Beverage/Groceries	(98,592.22)
Misc	(96,335.38)
Retail	(89,179.31)
Auto	(79,990.60)
GAS/CONVENIENCE STORE	(59,412.15)
Debt Payment/Fees	(34,322.36)
Total Amount Spent	(1,378,210.74)

Conclusion

117. Based on the foregoing, I have probable cause to believe, and I do believe, that Love and Chan conspired to commit wire fraud, in violation of 18 U.S.C. § 1349. I therefore

request that the Court issue a criminal complaint and arrest warrant for Love and Chan.

118. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney Bryan Chinwuba, and AUSA Chinwuba advised that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

119. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because any disclosure of the information at this time may cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

By phone pursuant to Fed. R. Crim. P. 4.1
Tyler Esswein
Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 2:10 ~~a.m.~~/p.m. on August 17, 2026.

Jolie A. Russo
HONORABLE JOLIE A. RUSSO
United States Magistrate Judge