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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY
GLOUCESTER COUNTY
DOCKET NO.

JENNIFER DAVENPORT,
Attorney General of New Jersey,
on behalf of
KEITH A. ALT,
Acting Chief of the New Jersey
Bureau of Securities,

Plaintiff,

v.

GREGORY DORELL PARKER JR.,
individually and d/b/a "Big
Bizzneesss";
DANIELLE MORRIS PARKER,
individually and d/b/a "Diamante
Financing";
BIG BIZZNEESSS, LLC;
DIAMANTE ENTERPRISES LLC;
AP CAPITAL LLC; and
DIAMANTE FINANCING, LLC,

Defendants.

Civil Action

COMPLAINT

Jennifer Davenport, Attorney General of New Jersey, on behalf of Keith A. Alt, Acting Chief of the New Jersey Bureau of Securities, ("Plaintiff"), alleges the following by way of complaint against the above-named Defendants:

SUMMARY

1. From early 2019 to late 2024, (the "Relevant Period"), to, from, or within New Jersey, Gregory Dorell Parker ("Greg Parker" or "G Parker") and Danielle "Nikki" Morris Parker ("Danielle Parker" or "DM Parker"), (collectively, the "Parkers"), perpetrated a securities fraud scheme upon at least thirty (30) investors (the "BB Investors"), of whom at least nine (9) were New Jersey residents.

2. The Parkers perpetrated the fraud by offering and selling unregistered securities as investments in purported real property-related projects (the "BB Securities") and raised over $1.5 million from the BB Investors.

3. The Parkers solicited the BB Investors through a funnel of social media posts, podcasts, in-person seminars, mentorship programs, and investor events, all of which they used to project an image of successful real-estate investors and to channel the audience into their real property investment scheme.

4. In offering and selling the BB Securities, the Parkers represented to the BB Investors, among other things, that:

a. investor funds would be used for acquiring and/or

renovating suitable real-estate, from which they could generate and share in the profits;

b. the Parkers or their entities either owned the investment properties, or would facilitate the purchase of the real estate with investor funds;

c. the investors would see returns on their investments upon the Parkers' successful completion of the projects or delivery of property; and/or

d. the Parkers and their associates would handle every aspect of the investments, while the investors simply collected passive returns.

5. In reality, however, and contrary to the Parkers' representations to the BB Investors, among other things:

a. the investment properties were distressed, vacant, abandoned, encumbered by tax liens, or foreclosed upon, and were unsuitable for any profit generation;

b. neither the Parkers nor their entities owned the investment properties, and investor funds would not be used to purchase the real estate;

c. the BB Securities did not, and could not, generate the promised returns; and/or

d. the Parkers would cease or drastically decrease contact with the investors soon after receiving their investment

funds and would not take any steps to facilitate the investment projects.

6. In offering and selling the BB Securities, the Parkers also failed to disclose material information to the BB Investors, including that:

a. they could not generate enough revenue from the investment properties or projects to pay the promised returns;

b. they were not wealthy real-estate investors, but rather had their own primary residence become subject to foreclosure proceedings;

c. G Parker had filed for personal bankruptcy in 2018;

d. the Parkers were not registered with the Bureau as agents to sell the BB Securities;

e. the Defendant Entities (as defined below) employed the Parkers as unregistered agents in connection with the offer and sale of the BB Securities;

f. the BB Securities were not registered with the Bureau, were not exempt from registration, and were not federally covered;

g. upon receipt, investment funds would be funneled into a pool of dozens of accounts held through numerous entities, with the diffused account structure lacking any apparent business purpose;

h. pooled investor funds would be commingled with the funds

of the Parkers, their entities, and investors in unrelated transactions, with no segregation mechanism;

i. pooled and commingled investor funds would be routed through third-party transmitters or withdrawn as cash, rendering those funds effectively untraceable; and/or

j. pooled and commingled investor funds would be spent on the Parkers' personal expenses or used to pay other investors in a Ponzi-like manner.

7. To facilitate their scheme, the Parkers employed an elaborate structure designed to absorb investor funds, obscure movement of the funds, and obfuscate the financial trail, consisting of:

a. a complex network of 27 proxy entities (the "BB Network"); and

b. a convoluted pool of 52 bank accounts belonging to the Parkers, custodial accounts of family members, and accounts of entities in the BB Network, (the "BB Pool").

8. Upon receipt of BB Investor funds, the Parkers commingled them by:

a. routing them into discrete BB Pool accounts with no segregation mechanism; and

b. shuffling funds through the accounts with no apparent or disclosed business purpose.

9. The Parkers also used a sophisticated apparatus to

conceal the trail of the investor funds, by:

a. layering them into many smaller outbound transfers;

b. eventually withdrawing them as cash, routing them through peer-to-peer money transmitters, or transferring them to custodial accounts; and

c. moving funds in and out of the BB Pool with such velocity that the accounts were drained as soon as they were funded.

10. Ultimately, the Parkers misappropriated and misused the BB Investor funds for, among other things:

a. their personal expenditures; and

b. making Ponzi-like payments to other investors.

11. Throughout the Relevant Period, through the accounts comprising the BB Pool which included the BB Investor funds, the Parkers:

a. received over $57 million in credits;

b. shuffled millions across the 52 pool accounts through thousands of transactions with no apparent or disclosed business purpose;

c. rerouted, converted, and made unexplained cash withdrawals totaling millions;

d. used millions for personal expenses and Ponzi-like payments; and

e. drew all accounts essentially to zero.

12. To date, the BB Investors have not received their full investment principal or the promised returns.

13. Despite variations in circumstances surrounding their sales, all BB Securities entailed the same investment, promising returns solely from the Parkers' efforts in a property-related venture, and all BB Investor funds shared the same fate once received by the Parkers.

JURISDICTION AND VENUE

14. The New Jersey Bureau of Securities (the "Bureau") is the state regulatory agency charged with administering the Uniform Securities Law (1997), N.J.S.A. 49:3-47 to -89 (the "Securities Law").

15. Plaintiff brings this action pursuant to the Securities Law for violations of:

i. N.J.S.A. 49:3-52(a) (employing a device, scheme, or artifice to defraud, as to G Parker and DM Parker);

ii. N.J.S.A. 49:3-52(b) (making materially false and misleading statements or omitting to state material facts necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading, as to all Defendants);

iii. N.J.S.A. 49:3-52(c) (engaging in any act, practice or course of business which operates or would operate as

a fraud or deceit upon any person, as to G Parker and DM Parker);

iv. N.J.S.A. 49:3-60 (offer and sale of unregistered securities, as to all Defendants);

v. N.J.S.A. 49:3-56(a) (acting as unregistered agents, as to G Parker and DM Parker); and

vi. N.J.S.A. 49:3-56(h) (employing unregistered agents, as to Defendant Entities as defined below).

16. Jurisdiction is proper in New Jersey over Defendants because each alleged violation of the Securities Law originated from this State.

17. Venue is proper in Gloucester County pursuant to R. 4:3-2(a)(3) because it is the county in which the cause of action arose.

PARTIES

18. Keith A. Alt, Acting Chief of the New Jersey Bureau of Securities (the "Bureau Chief"), is the principal executive officer of the Bureau, with offices at 153 Halsey Street, Newark, New Jersey. Jennifer Davenport, Attorney General of New Jersey, brings this action on behalf of the Bureau Chief pursuant to N.J.S.A. 49:3-69(a)(2).

19. G Parker is a social media personality who purported to be a successful real-estate investor and, at times under the "Big Bizzneesss" brand, projected an image of success and wealth from

humble beginnings.

20. G Parker, at all relevant times, was domiciled in Swedesboro (Woolwich Township), New Jersey.

21. DM Parker is G Parker's spouse, who is also a social media personality purporting to be a successful real-estate investor, and, at times under the "Diamante Financing" brand, projected an image of success and wealth.

22. DM Parker, at all relevant times, was domiciled in Swedesboro (Woolwich Township), New Jersey.

23. Defendants Big Bizzneesss, LLC, Diamante Enterprises LLC, AP Capital LLC, and Diamante Financing, LLC were entities created, operated, and owned by G Parker and/or DM Parker, with their bank accounts and operations controlled by G Parker and/or DM Parker at all times (collectively, the "Defendant Entities").

24. The Parkers, throughout the Relevant Period, created and operated the BB Network, consisting of the Defendant Entities and: G Parker Unlimited LLC; Maybach Construction LLC; Billionaire Investment Boys Group LLC; Lady Millionaires Club LLC; Ariella Estates LLC; Been Rich Lifestyle, LLC; Diamante Estates, LLC; Diamante Investment Group LLC; GG Properties Unlimited, LLC; Kash Properties Unlimited LLC; Lady Millionaires, LLC; Maybach Construction Cleveland LLC; Nori Properties, LLC; Parker Airways, LLC; Parker Community Development LLC; Parker Estates, LLC; Parker Properties Unlimited LLC; Parker Unlimited Properties LLC; Rehab

Queen LLC; Rehab Queen Ohio, LLC; Sixteen Thirty Seven LLC; Twelve Forty Five LLC; and We Build Too, LLC, (collectively, the "BB Network Entities").

25. The Parkers created, owned, operated, and controlled the bank accounts of all BB Network Entities, which acted at all relevant times solely through the Parkers.

26. G Parker and DM Parker, at all relevant times, acted together from their New Jersey home as a single unit with interchangeable roles in the conduct alleged herein, including: owning and controlling the BB Network Entities and the BB Pool accounts; offering and selling the BB Securities; soliciting and receiving BB Investor funds; and directing the movement, use, and dissipation of those funds.

27. As set forth herein, at all relevant times, the Parkers controlled and acted as the only two principals of the BB Network Entities, operated the entities without regard to any separate corporate form and existence, moved and commingled funds among the entities' bank accounts without any segregation, solicited investments and conducted business in the entities' names interchangeably, and used all BB Network Entities as their alter egos and as alter egos of one another.

FACTUAL BACKGROUND

I. Background and Social Media Presence

28. G Parker and DM Parker, from their New Jersey home, cultivated an image of successful real-estate investors with a lavish lifestyle through various online media, including:

a. Instagram accounts of G Parker with over 383,000 followers and DM Parker with over 229,000 followers;

b. Facebook accounts of G Parker with over 228,000 followers and DM Parker with over 295,000 followers; and

c. YouTube channels "Big Bizzneesss with Greg Parker" with over 7,000 subscribers and "Lady Millionaire Podcast" with over 1,500 subscribers.

29. The Parkers targeted investors through posts and podcasts, where they accompanied their display of wealth and success with reminders of their humble beginnings, promises that the same was possible for those in the audience, promotion of their mentoring programs and seminars, and solicitation of investments in the BB Securities.

30. While projecting themselves as a successful and wealthy couple, the Parkers omitted information inconsistent with that messaging but material to potential investors in their investment offerings, including:

a. Foreclosure proceedings in 2014 on the Parkers' primary residence in Swedesboro, New Jersey, based on G Parker's

default on a $656,100 loan;

b. G Parker's filing for Chapter 13 bankruptcy in April 2018, and later conversion thereof to a Chapter 11 bankruptcy in December 2018, in the U.S. Bankruptcy Court for the District of New Jersey;

c. a Chapter 11 Bankruptcy filed in June 2023 for an entity of the BB Network in the U.S. Bankruptcy Court for the Southern District of Florida; and

d. a Chapter 11 Bankruptcy filed in May 2024, for seven entities of the BB Network in the U.S. Bankruptcy Court for the Eastern District of Pennsylvania.

II. The Offer and Sale of the BB Securities

31. During the Relevant Period, the Parkers and the Defendant Entities offered and sold BB Securities as investments in various real property-related ventures, raising in total over $1.5 million from at least thirty investors, at least nine of whom were New Jersey residents.

A. The BB Securities

32. The Parkers and the respective Defendant Entities offered and sold the BB Securities both via documents titled "Joint Venture Agreement" or "Joint Venture Contract" and through verbal agreements (the "BB JVAs"), based on the understanding that the investors were investing in a real property-related venture, in

which they would have a completely passive role with the expectation of returns on the investments, in which the Parkers would generate and share.

33. The BB Securities did not grant investors any ownership or voting rights, the Parkers never disclosed any investment risks to the investors, and the investments were completely reliant on the Parkers' facilitation of the ventures.

34. Some BB JVAs identified a specific investment property as the subject of the venture, including some listing the same investment property but sold to multiple investors without their knowledge, while other BB JVAs did not identify any investment property and relied on the Parkers' efforts in finding or acquiring a property suitable for investment and profit generation.

35. In offering and selling the BB Securities, the Parkers and the respective Defendant Entities made various representations to the BB Investors, including that:

a. they would use investor funds to generate profits through acquisition and/or rehabilitation of a specific, suitable parcel of real property;

b. the Parkers or the respective Defendant Entities already owned the underlying investment property or would use the investors' funds to acquire the real estate for investment;

c. within a fixed term or based on the Parkers' successful

efforts, the investors would receive a return on their investment; and

d. the Parkers and their associates would manage every facet of the venture while the investors did nothing but collect the promised return.

36. In reality, and contrary to the Parkers and the respective Defendant Entities' representations to the BB Investors, among other things:

a. the properties were distressed, abandoned, encumbered by tax liens, or already in foreclosure, and unfit for renovation and profit generation;

b. neither the Parkers nor the respective Defendant Entities owned the properties, and investor funds would not be used to purchase them;

c. the BB Securities were incapable of producing the promised returns; and

d. shortly after receiving investor funds, the Parkers would reduce contact with the investors and make no effort to advance the projects.

37. The Parkers and the respective Defendant Entities also failed to disclose to the BB Investors material information, including that:

a. the Parkers and their entities had no means of generating enough profits from the investment properties to pay the

promised returns;

b. far from being successful real-estate investors, the Parkers had their own primary residence become subject to foreclosure proceedings;

c. G Parker had filed for personal bankruptcy in 2018;

d. the Parkers were not registered with the Bureau as agents to sell the BB Securities;

e. the BB Securities were not registered with the Bureau, exempt from registration, or federally covered;

f. upon receiving BB Investor funds, the Parkers would funnel the funds into the BB Pool and commingle them with funds of other BB Investors, of the Parkers and their entities, and of investors in unrelated transactions, with no means of segregating any investors' investment funds;

g. the commingled investor funds would be transferred between and among the 52 BB Pool accounts and routed through third-party transmitters or withdrawn as cash, leaving them effectively untraceable; and

h. investor funds would eventually be spent on the Parkers' personal expenses or used to pay other investors in a Ponzi-like manner.

38. The BB Securities are "securities" as defined in N.J.S.A. 49:3-49(m).

B. The BB Investors

39. Although the solicitation medium, manner of investment, outlined method of profit generation, or the issuer varied from investor to investor, all BB Securities entailed the same investment: a passive interest in a property-related venture, with promised returns to be generated by the Parkers and shared with the investor, without any efforts expected from the investor, as illustrated below.

Investor R.J.[1]

40. Investor R.J. is a New Jersey resident who met with G Parker in 2020 to discuss potentially investing an inheritance, following which G Parker flew him to Cleveland, Ohio on a private jet to attend a seminar promoting the Parkers' business.

41. On August 1, 2020, Investor R.J. invested $100,000 into BB Securities, entering into a BB JVA with the Parkers, acting on behalf of AP Capital LLC.

42. When Investor R.J. purchased the BB Securities, the Parkers and AP Capital assured him that the funds would be used to purchase and renovate an investment property, represented that the Parkers would manage the investment, and guaranteed Investor R.J. the return of his principal, along with a 20% return, in six

[1] To protect the privacy of non-party investor-victims, Plaintiff refers to each investor by his or her initials, and will disclose any investor's identity to the Court in camera upon request.

months.

43. The Parkers never disclosed to Investor R.J. any investment risks, that neither the Parkers nor AP Capital owned the investment property, or that Investor R.J.'s investment funds would be pooled with the funds of other BB Investors, the Parkers and their entities, and investors in unrelated transactions.

44. When Investor R.J. sought the return of his investment on maturity, the Parkers became unresponsive, stopped taking Investor R.J.'s calls, and eventually routed him to an associate who stated that the Parkers controlled the money and there was nothing she could do.

45. Investor R.J., to date, has received neither his full principal back, nor any promised returns on his investment.

Investors D.C. and T.K.

46. Investor D.C. and his fiancée, Investor T.K., are a New Jersey couple who learned of the Parkers through social media.

47. In 2021, Investor D.C. paid for a real-estate mentorship program from G Parker and attended a seminar at the Showboat Hotel in Atlantic City, New Jersey, where G Parker offered attendees investment opportunities in Cleveland, Ohio.

48. Subsequently, Investor T.K. attended a ladies-only seminar hosted on a yacht by DM Parker, where Investor T.K. purchased DM Parker's real-estate mentorship program.

49. Investors D.C. and T.K. then jointly invested a total of

$180,000 in BB Securities by entering into four BB JVAs with Diamante Enterprises, LLC, each dated January 25, 2022.

50. Three of the BB JVAs identified an investment property that Diamante Enterprises allegedly owned, and guaranteed the return of Investors D.C. and T.K.'s principal along with a 20% return upon the Parkers' renovation and sale of the properties, while the fourth BB JVA had no set term or identified property and was an investment in a multi-unit property which the Parkers were going to find and determine to be suitable for profit generation.

51. Investors D.C. and T.K. had several meetings with the Parkers, including a visit to their home in Swedesboro, New Jersey, to discuss the investments and the investment properties.

52. The Parkers and Diamante Enterprises assured that they would manage Investors D.C. and T.K.'s investments, with no efforts expected of Investors D.C. and T.K., without disclosing that the investment carried risks, that Diamante Enterprises did not own the three identified properties, that the Parkers would not make any efforts to find a multi-unit property, or that Investors D.C. and T.K.'s investment funds would be pooled with the funds of others.

53. Approximately six months after Investors D.C. and T.K. invested in the BB Securities, the Parkers became difficult to reach, refused to return Investors D.C. and T.K.'s principal or pay the promised returns, merely offered excuses for non-payment

and lack of progress, and made no efforts to complete the projects.

54. Investors D.C. and T.K., to date, have not received return of their principal or any return on their investments.

Investor J.C.

55. Investor J.C., a New Jersey resident, learned of and began following the Parkers through social media, and attended multiple Parker-hosted events in early 2020, including an investor event at the Showboat Hotel in Atlantic City, New Jersey.

56. At one of those events, Investor J.C. had an in-person meeting with G Parker and was presented with an investment opportunity in Cleveland, Ohio that entailed Investor J.C. investing $85,000 into BB Securities and receiving the rental income of an investment property, which the Parkers would select only after Investor J.C. made the investment.

57. The Parkers, acting on behalf of AP Capital, assured Investor J.C. that they would select and transfer a property suitable for profit generation, that they would manage the property while directing the rental income to Investor J.C., and that Investor J.C. would neither need to visit Cleveland, Ohio nor do anything other than receiving the periodic passive income, without disclosing to Investor J.C. any investment risks or that they would not make any of the described efforts.

58. Soon after Investor J.C. invested $85,000 in the BB Securities and wired his investment funds to an AP Capital LLC

bank account on March 9, 2020, the Parkers began evading and stonewalling Investor J.C., made no effort to identify a property for Investor J.C.'s investment, and refused to provide Investor J.C. with any documentation of his investment.

59. Following Investor J.C.'s repeated attempts for 21 months, on December 15, 2021, the Parkers provided Investor J.C. a real-estate contract purporting to transfer, from Diamante Enterprises to Investor J.C., a specific property in East Cleveland, Ohio, which turned out to be owned by neither the Parkers nor Diamante Enterprises, but instead by unrelated third parties.

60. To date, Investor J.C. has received neither the promised returns on his investment nor his principal.

Investor M.D.

61. Investor M.D. ("M.D."), a New Jersey resident during the Relevant Period, followed real-estate advisors on social media and, after seeing the Parkers' videos, was drawn to invest with them, later attending a large Parker-hosted investment conference and joining G Parker's paid mentorship program.

62. On October 6, 2022, Investor M.D. went to the Parkers' Swedesboro, New Jersey residence with his wife, where he agreed to invest $10,000 in BB Securities, understanding that the Parkers would return his $10,000 principal with profits within the year.

63. The Parkers then prepared a BB JVA for Investor M.D. to

sign, which he did during that same visit, following which the Parkers facilitated the transfer of $10,000 from Investor M.D. to their accounts through credit card payments.

64. The BB JVA which Investor M.D. signed stated that the investment was into "a common fund for the purpose of acquiring residential units," which entailed the Parkers acquiring and selling the units and sharing the profits either 50/50 or 70/30 between the Parkers and Investor M.D.

65. At the end of the one-year period, the Parkers returned neither profits nor Investor M.D.'s principal, and instead have stalled and provided excuses for non-payment.

66. To date, Investor M.D. has not received any return on his investment, and has not received back his principal.

C. The Education-to-Investment Pipeline

67. The Parkers operated a recurring solicitation apparatus using educational podcasts, paid seminars, mentorship programs, and investor events, (collectively, the "BB Funnel") under various monikers including Big Bizzneesss, Billionaire Boys, and Lady Millionaires.

68. The BB Funnel allowed the Parkers to project an image of real-estate investment success and solicit investors, such as Investors D.C., T.K., M.D., and R.J., in the BB Securities while also funding the BB Pool with event ticket revenues, which flowed into the very same BB Pool accounts that received and dissipated

investor funds.

69. The BB Pool accounts received hundreds of thousands in course payments and ticket sales throughout the Relevant Period, all of which were pooled with and undifferentiated from BB Investor funds.

III. The BB Network and the BB Pool

70. To facilitate their scheme, the Parkers built and operated a two-layered financial apparatus that received investor capital, obscured its origin, and rendered it effectively untraceable, consisting of:

a. a network of 27 entities (the BB Network); and

b. a web of 52 bank accounts (the BB Pool).

A. The BB Network

71. The 27 BB Network Entities, most of them proliferations with similar names, served no evident business purpose, but rather merely allowed the Parkers to open multiple additional bank accounts through which investors funds could be routed, thereby further obscuring their origins as typified by:

a. **near-duplication**, with multiple entities under slightly different names but no distinct operations, such as four Diamante variants and three Parker Unlimited variants;

b. **multiple bank accounts per entity**, held with no apparent business purpose, including seven for Maybach entities

and ten for Diamante entities; and

c. **common control**, with the Parkers exercising full control over accounts titled to them, to their entities, or to their child or relative under "UTMA" or "UTTMA" titles with the Parkers as custodians.

B. The BB Pool

72. While 52 accounts comprised the BB Pool, thirty of which were at PNC Bank and 22 of which were at TD Bank, a handful of them functioned as high-volume intake hubs, receiving and dispersing investor funds across the remainder of the BB Pool, including:

a. a Diamante Enterprises account at PNC Bank ending in "6312" (the "#6312 PNC Hub");

b. a G Parker Unlimited account at PNC Bank ending in "6161" (the "#6161 PNC Hub");

c. a G Parker Unlimited account at TD Bank ending in "6460" (the "#6460 TD Hub"); and

d. an AP Capital account at PNC Bank ending in "6188" (the "#6188 PNC Hub").

73. The 27 entities, 52 bank accounts, and the routing of investor money through entities with near-identical names and custodial accounts did not serve any purpose related to property acquisition, renovation, profit generation, or any other purpose disclosed to the BB Investors, and instead served to receive

investor funds, strip them of any separate identity, conceal their movement, and place them beyond practical recovery.

IV. Commingling of Investor Funds

74. The Parkers obscured the separate nature of the BB Investors' funds by commingling them in the BB Pool and operating it as a single master account.

75. The commingling of investor funds upon deposit with no segregation, coupled with their continuous movement among the BB Pool accounts, made it inconsequential where investor funds were deposited, since once inside the BB Pool, the funds could, and did, end up anywhere within it.

A. Absence of Segregation

76. The intake hubs received most of the BB Investors' fund deposits, which flowed through one undifferentiated ledger together with the Parkers' everyday household spending, ticket sale revenue, and/or loan repayments, among other things.

77. The commingling without segregation eliminated any distinction among BB Investors' funds and between them and any other assets.

78. The complete absence of distinction between the funds rendered every transaction an inherent misuse of investors' funds.

B. Shuffling of Investor Funds

79. The Parkers moved millions through thousands of

transfers between and among the BB Pool accounts which included BB Investors' funds, for no discernable business purpose or any purpose disclosed to the BB Investors, with the sole effect of fragmenting and relocating account balances and obscuring the trail of investor funds, as evidenced by:

a. **round figure transfers** indicating fund relocation rather than business-related expenditure;

b. **circular fund flow**, with back-and-forth transfers between the same accounts, such as:

   i. at least 127 transfers totaling $959,833 between the #6161 PNC Hub and a Maybach Construction account at PNC Bank ending in "4591"; and

   ii. at least 179 transfers totaling $511,491 between two Danielle Parker accounts at PNC Bank ending in "4487" and "8903"; and

c. **sister-account transfers**, with the funds continuously moving between two accounts of the same entity for no apparent operational function or any purpose disclosed to investors, such as 203 transfers totaling $410,342 between the Diamante Enterprises-owned #6312 PNC Hub and a sister Diamante Enterprises account at PNC Bank ending in "1903".

80. Through this structure, the Parkers converted 52 nominally separate accounts into, and operated them as, a single master account.

V. Concealment of Investor Funds

81. The Parkers then moved the commingled BB Investor funds through a series of processes they employed, which served no purpose other than concealing the funds' flow and ultimate disposition, by:

a. **layering** investor deposits into multiple smaller outbound transfers;

b. **converting** funds into cash or routing them through peer-to-peer money transmitters or custodial accounts; and

c. **rapidly moving** funds in and out of accounts with such velocity that their balances were drained as soon as they were funded.

A. Layering

82. Within days of deposit, BB Investor funds would typically be broken into many smaller outbound transfers to multiple accounts and counterparties, resulting in no single downstream payment corresponding to the initial deposit, as illustrated by:

a. Investor R.J.'s $100,000 investment, deposited into the #6188 PNC Hub on August 3, 2020, dispersed within four days to other BB Pool accounts and more than a dozen parties through checks, transfers, and wires, including a check to another BB Investor D.H., checks to unrelated individuals with memo notes including "ROI," "Refund," or

"Rental + Utility Payment," a wire to another BB Pool account, and a wire to a hair salon;

b. $50,000 investment deposit of a BB Investor V.M., received in the #6312 PNC Hub on November 10, 2022, fragmented into pieces, and wired to two DM Parker accounts and several unrelated parties within four days; and

c. another BB Investor D.P.'s $175,000 investment, wired on March 5, 2020 to the #6188 PNC Hub, dispersed to unrelated individuals on the same and following days through a cascade of wires and checks, including three checks with "ROI" and another with "Refund" written on the memo lines.

83. In each instance, a six-figure investment was immediately broken into smaller, unrelated payments or transfers with no apparent or disclosed business purpose, and certainly no purpose related to an investment in a real property venture.

B. Conversion and Routing

84. In addition to concealing the funds' movement, the Parkers also practiced methods serving specifically to cover the funds' electronic trail, via:

a. **cash**, with millions withdrawn at a teller or by ATM, irreconcilable to any BB Securities property expenditure, including withdrawals in Swedesboro, Paulsboro, Logan Township, and Mullica Hill, all in the vicinity of the Parkers' home in New Jersey;

b. **peer-to-peer money transmitters**, routing hundreds of thousands through Cash App, Venmo, Zelle, and PayPal; and

c. **custodial accounts and minors**, directing over one hundred thousand dollars into custodial accounts and application handles in the name of the Parkers' minor child and relatives, obscuring the trail and placing assets, including investor funds, beyond practical recovery.

C. Rapid In-and-Out Movement

85. The BB Pool served as a conduit, not a repository, as seen with:

a. #6312 PNC Hub's receipt of Investors D.C. and T.K.'s $180,000 investment on January 26, 2022, and its balance drawing down to $908.27 by January 31, 2022;

b. #6188 PNC Hub's receipt of Investor J.C.'s $85,000 investment on March 9, 2020, followed by dozens of outgoing wires and checks, including two with "ROI" memo notes, and its balance sinking to $4,213.68 by March 13, 2020; and

c. #6161 PNC Hub's receipt of another BB Investor H.H.'s $15,000 investment on December 5, 2019, turning the account's balance positive, and the immediate dispersion of the funds to several BB Pool accounts, leaving a balance of $49.22 by the end of the day.

86. Although the BB Pool accounts received over $57 million

in credits throughout the Relevant Period, the collective balance of the entire 52-account network was consistently a fraction of that amount.

87. The Parkers moved funds through the BB Pool at such high velocity that each quarter-end collective balance of the pool sat far lower than the millions in total inflows of all accounts, as demonstrated below:

Table I: Quarterly Total Credits into BB Pool Accounts vs. Collective Quarter-End Balance of the BB Pool[2]

Quarter	Total Inflows	BB Pool Balance
2019-Q1	$4,246,580	$273,576
2019-Q2	$5,223,712	$203,384
2019-Q3	$6,589,078	$88,579
2019-Q4	$4,444,165	$23,142
2020-Q1	$4,504,253	$75,804
2020-Q2	$3,446,903	$203,406
2020-Q3	$5,401,111	$227,578
2020-Q4	$3,714,709	$310,078
2021-Q1	$2,363,498	$77,563
2021-Q2	$2,511,657	$95,906
2021-Q3	$2,611,508	$70,152
2021-Q4	$2,083,126	$101,271
2022-Q1	$1,985,524	$29,640
2022-Q2	$2,142,159	$99,371
2022-Q3	$2,071,477	$91,639
2022-Q4	$2,265,436	$48,675
2023-Q1	$1,472,606	$15,701
2023-Q2	$218,902	$1,670
2023-Q3	$50,691	$3,746
2023-Q4	$31,749	- $182

[2] Plaintiff conducted a statement-based quarterly analysis rather than a calendar-based one, assigning all transactions in a bank statement to the quarter in which the statement ended.

88. The BB Pool accounts were chronically overdrawn throughout the Relevant Period, with hundreds of transactions labelled overdraft-item fee, returned-item (NSF) charge, and continuous-overdraft charge.

89. The layering, conversion, and rapid in-and-out movement of the funds concealed from investors, financial institutions, and regulators, the speedy dissipation of the investor funds, impeding their traceability, and allowing the Parkers to continue their scheme without raising any red flags.

VI. Misuse of Investor Funds

90. Having first commingled and then concealed the movement of BB Investor funds, the Parkers then misappropriated the funds and misused them by:

a. paying for the Parkers' personal and household expenses; and

b. making Ponzi-like payments to other investors.

A. Personal and Household Expenditures

91. The Parkers spent BB Investor funds for their own personal benefit, as illustrated by:

a. the September 2, 2020 deposit of $25,000 from a BB Investor R.G. into the #6161 PNC Hub, followed by, among other things, the Parkers' payments to Amazon.com, Air Fort Worth, Client State Farm, Stamps.com, Capital One,

and Carpay Capital One Auto, bringing the balance of the account down to $2,840.88 by September 8, 2020; and

b. the January 31, 2020 and February 3, 2020 deposits totaling $55,000 from another BB Investor L.M. into the #6161 PNC Hub, followed by, among other things, payments to Towneplace Suites, AppFolio, JetBlue, and RMG Regus, and transfers to unrelated individuals, shrinking the account's balance to $7,805.19 by February 5, 2020.

92. Throughout the Relevant Period, the Parkers used millions from the BB Pool, including BB Investor funds, among other things, to pay for:

a. private-aviation and commercial airfare;

b. hotel, resort, and travel;

c. luxury auto and car-related payments; and

d. dining, entertainment, luxury apparel, and jewelry.

B. Ponzi-Like Payments to Investors

93. While the property-related ventures in which the BB Investors invested through the BB Securities had no revenue, the Parkers used BB Pool funds, which included BB Investor funds, to make repayments to other BB Investors and investors in unrelated transactions, as seen with Investor R.J.'s and Investor D.P.'s investment deposits discussed above, and also with numerous payments made to unrelated parties through checks with "ROI" noted in the memo line.

94. The Parkers did not apply BB Investor funds to acquire, renovate, or generate profit from the investment properties, and instead treated the funds as their own to spend, withdraw, and/or recycle to other investors.

95. Through the conduct described above, including their misappropriation, rerouting, conversion, and misuse, the Parkers drew all accounts of the BB Pool to zero by the end of the Relevant Period.

COUNT I

EMPLOYING A DEVICE, SCHEME, OR ARTIFICE TO DEFRAUD, IN VIOLATION OF N.J.S.A. 49:3-52(a)

(As to Defendants G Parker and DM Parker)

96. The preceding paragraphs are incorporated by reference as though set forth verbatim herein.

97. Pursuant to N.J.S.A. 49:3-52:

> It shall be unlawful for any person, in connection with the offer, sale or purchase of any security, directly or indirectly
> (a) [t]o employ any device, scheme or artifice to defraud[.]

98. The BB Securities are "securities" as defined in N.J.S.A. 49:3-49(m).

99. In connection with the offer and sale of the BB Securities, the Parkers employed a device, scheme, or artifice to defraud the BB Investors by, among other things:

a. misrepresenting and omitting to disclose material facts;

b. operating a solicitation apparatus of social media posts,

podcasts, seminars, mentorship programs, and investor events to solicit investors to invest in the BB Securities;

c. creating sham entity layers through a complex network of 27 proxy entities;

d. engineering and operating a convoluted labyrinth of 52 bank accounts through which to funnel investor funds;

e. commingling investor funds with their own personal funds, funds of their entities, funds of other BB Investors, and funds of investors in unrelated transactions, with no segregation mechanism;

f. continuously shuffling investor funds through dozens of accounts with no apparent business purpose;

g. layering investor fund deposits into multiple smaller outbound transfers, concealing their trail;

h. converting investor funds to cash or routing them through peer-to-peer money transmitters and custodial accounts, rendering them effectively untraceable;

i. rapidly moving funds in and out of the BB Pool accounts, draining the accounts as soon as they were funded;

j. misusing BB Investor funds to pay for the Parkers' personal expenses; and

k. making Ponzi-like payments to other investors.

100. Each device, scheme, or artifice to defraud employed by

the Parkers is a separate violation of N.J.S.A. 49:3-52(a) and is cause for the imposition of civil monetary penalties pursuant to N.J.S.A. 49:3-70.1.

COUNT II

MAKING UNTRUE STATEMENTS OF MATERIAL FACTS AND/OR OMITTING TO STATE MATERIAL FACTS NECESSARY IN ORDER TO MAKE THE STATEMENTS MADE, IN THE LIGHT OF THE CIRCUMSTANCES UNDER WHICH THEY WERE MADE, NOT MISLEADING, IN VIOLATION OF N.J.S.A. 49:3-52(b)

(As to All Defendants)

101. The preceding paragraphs are incorporated by reference as though set forth verbatim herein.

102. Pursuant to N.J.S.A. 49:3-52:

> It shall be unlawful for any person, in connection with the offer, sale or purchase of any security, directly or indirectly
>
> . . . .
>
> (b) [t]o make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading[.]

103. In connection with the offer and sale of the BB Securities, Defendants, among other things, misrepresented to BB Investors that:

a. BB Investor funds would be used to acquire and/or renovate specific, identified real property suitable for profit generation, when in reality the properties had tax liens, or were distressed, vacant, abandoned, or were foreclosed upon, and therefore not suitable for any profit

generation;

b. the Parkers or their entities owned the properties subject to the investments, or would facilitate the purchase of the real estate with investor funds, although neither the Parkers nor their entities owned the real estate and investor funds would not be used to purchase them;

c. investors would see returns within a set term or following successful efforts of the Parkers, while the BB Securities did not and could not generate the promised returns; and/or

d. the Parkers and their associates would manage the investments while the investors collected passive returns, when in fact the Parkers would cease or drastically decrease contact with the investors soon after receiving the investment funds and would abandon the effort.

104. Each misrepresentation of each material fact by each Defendant to each investor is a separate violation of N.J.S.A. 49:3-52(b) and is cause for the imposition of civil monetary penalties pursuant to N.J.S.A. 49:3-70.1.

105. In connection with the offer and sale of the BB Securities, Defendants also omitted to state material facts to BB Investors, including that:

a. the investments could not generate sufficient revenue to

pay the promised returns to BB Investors;

b. the Parkers were not successful investors and had their own primary residence become subject to foreclosure proceedings;

c. G Parker had filed for personal bankruptcy;

d. the Parkers were not registered with the Bureau as agents to sell the BB Securities;

e. the Defendant Entities employed the Parkers as unregistered agents in connection with the offer and sale of the BB Securities;

f. the BB Securities were not registered with the Bureau, were not exempt from registration, and were not federally covered;

g. BB Investor funds would be funneled into a convoluted structure of dozens of bank accounts held through dozens of entities;

h. BB Investor funds would be commingled with funds of the Parkers and their entities, of other BB Investors, and of investors in unrelated transactions, with no mechanism to segregate them;

i. investor funds would be shuffled and routed through various mechanisms and then cashed out, rendering them effectively untraceable; and/or

j. BB Investor funds would be used to pay for the Parkers'

personal expenses and to pay earlier investors in a Ponzi-like manner.

106. Each omission of each material fact by each Defendant as to each investor is a separate violation of N.J.S.A. 49:3-52(b) and is cause for the imposition of civil monetary penalties pursuant to N.J.S.A. 49:3-70.1.

COUNT III

ENGAGING IN ANY ACT, PRACTICE, OR COURSE OF BUSINESS WHICH WOULD OPERATE AS A FRAUD OR DECEIT UPON ANY PERSON IN CONNECTION WITH THE OFFER, SALE, OR PURCHASE OF SECURITIES, IN VIOLATION OF N.J.S.A. 49:3-52(c)

(As to Defendants G Parker and DM Parker)

107. The preceding paragraphs are incorporated by reference as though set forth verbatim herein.

108. Pursuant to N.J.S.A. 49:3-52:

> It shall be unlawful for any person, in connection with the offer, sale or purchase of any security, directly or indirectly
>
> . . . .
>
> (c) [t]o engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person[.]

109. In connection with the offer and sale of the BB Securities, the Parkers engaged in an act, practice, or course of business which operated, and continues to operate, as a fraud or deceit upon the BB Investors by, among other things:

a. misrepresenting and omitting to disclose material facts;

b. operating a solicitation apparatus of social media posts,

podcasts, seminars, mentorship programs, and investor events to solicit investors to invest in the BB Securities;

c. creating sham entity layers through a complex network of 27 proxy entities;

d. engineering and operating a convoluted labyrinth of 52 bank accounts to funnel investor funds through;

e. commingling investor funds with funds of the Parkers and their entities, of other BB Investors, and of investors in unrelated transactions, with no segregation mechanism;

f. continuously shuffling investor funds through dozens of accounts with no apparent business purpose;

g. layering investor fund deposits into multiple smaller outbound transfers, concealing their trail;

h. converting BB Investor funds to cash or routing them through peer-to-peer money transmitters and custodial accounts, rendering them effectively untraceable;

i. rapidly moving funds in and out of the BB Pool accounts, draining the accounts as soon as they were funded;

j. misusing the funds to pay for the Parkers' personal expenses; and

k. making Ponzi-like payments to other investors.

110. Each act, practice, or course of business engaged in furtherance of the fraud or deceit by the Parkers as to each

investor is a separate violation of N.J.S.A. 49:3-52(c) and is cause for imposition of civil monetary penalties for each separate violation pursuant to N.J.S.A. 49:3-70.1.

COUNT IV

OFFER AND SALE OF UNREGISTERED SECURITIES IN VIOLATION OF N.J.S.A. 49:3-60

(As to All Defendants)

111. The preceding paragraphs are incorporated by reference as though set forth verbatim herein.

112. The BB Securities are securities as defined in N.J.S.A. 49:3-49(m).

113. The BB Securities were required to be registered with the Bureau pursuant to N.J.S.A. 49:3-60.

114. The BB Securities were not registered with the Bureau, exempt from registration, or federally covered.

115. Defendants offered and sold the unregistered BB Securities in violation of N.J.S.A. 49:3-60.

116. Each offer and sale of the BB Securities constitutes a separate violation of N.J.S.A. 49:3-60 by each Defendant and is cause for the imposition of civil monetary penalties pursuant to N.J.S.A. 49:3-70.1.

COUNT V

ACTING AS AN AGENT IN THIS STATE WITHOUT REGISTRATION IN VIOLATION OF N.J.S.A. 49:3-56(a)

(As to Defendants G Parker and DM Parker)

117. The preceding paragraphs are incorporated by reference

as though set forth verbatim herein.

118. G Parker acted as an agent of the Defendant Entities in effecting or attempting to effect transactions in securities to, from, or within New Jersey, without being registered with the Bureau, in violation of N.J.S.A. 49:3-56(a).

119. DM Parker acted as an agent of the Defendant Entities in effecting or attempting to effect transactions in securities to, from, or within New Jersey, without being registered with the Bureau, in violation of N.J.S.A. 49:3-56(a).

120. Each act by G Parker and DM Parker as unregistered agents of the Defendant Entities constitutes a separate violation of N.J.S.A. 49:3-56(a) and is cause for the imposition of civil monetary penalties pursuant to N.J.S.A. 49:3-70.1.

COUNT VI

EMPLOYING AN UNREGISTERED AGENT IN VIOLATION OF N.J.S.A. 49:3-56(h)

(As to the Defendant Entities)

121. The preceding paragraphs are incorporated by reference as though set forth verbatim herein.

122. Pursuant to N.J.S.A. 49:3-56(h), "[i]t shall be unlawful for any [] issuer to employ an agent in this State unless the agent is registered[,]" as that term is defined under N.J.S.A. 49:3-49(b) as any individual "who represents . . . [an] issuer in effecting or attempting to effect purchases or sales of securities."

123. The Defendant Entities employed the Parkers as agents, as defined under N.J.S.A. 49:3-49(b), without registration with the Bureau, in violation of N.J.S.A. 49:3-56(h).

124. Each sale of the BB Securities through the Parkers as agents is a separate violation of N.J.S.A. 49:3-56(h) by each Defendant Entity and is cause for the imposition of civil monetary penalties pursuant to N.J.S.A. 49:3-70.1.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the entry of a judgment pursuant to N.J.S.A. 49:3-47 to -89:

A. Finding that Defendants engaged in the acts and practices set forth herein;

B. Finding that such acts and practices constitute violations of the Securities Law;

C. Permanently enjoining Defendants from violating the Securities Law in any manner;

D. Permanently enjoining the issuance, sale, offer for sale, purchase, offer to purchase, promotion, negotiation, solicitation, advertisement, or distribution to, from or within New Jersey of any securities, by or on behalf of Defendants, and their employees, agents, brokers, partners, stockholders, attorneys, successors, subsidiaries, and affiliates;

E. Permanently enjoining Defendants from controlling or associating in any capacity with any broker-dealer or investment adviser doing business from, into, or within the State of New Jersey;

F. Permanently enjoining Defendants from controlling any issuer as that term is defined in N.J.S.A. 49:3-49(h), whose securities are offered for sale and/or sold in New Jersey;

G. Assessing civil monetary penalties against Defendants, jointly and severally, for each violation of the Securities Law in accordance with N.J.S.A. 49:3-70.1;

H. Requiring Defendants to, jointly and severally, pay restitution;

I. Requiring Defendants to, jointly and severally, disgorge all profits and all funds gained through violations of the Securities Law; and

J. Affording Plaintiff any additional relief the Court may deem just and equitable.

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: H.O.Chekemian
Hovhannes Onno Chekemian
Deputy Attorney General

Dated: November 4, 2026

RULE 4:5-1 CERTIFICATION

Pursuant to R. 4:5-1, the undersigned certifies that the matter in controversy is the subject of the following action pending in the United States District Court for the Northern District of Ohio, Eastern Division: United States v. Parker, 1:26-cr-00200 (N.D. Ohio).

The undersigned further certifies that he is not aware of any other pending or contemplated actions involving the matter in controversy, other than those that may arise from the Bureau's investigation.

I certify that the foregoing statements made by me are true. I am aware that if any of those statements are wilfully false, I am subject to punishment.

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: H.O.Chekemian
Hovhannes Onno Chekemian
Deputy Attorney General

Dated: November 4, 2026

RULE 1:38-7(c) CERTIFICATION OF COMPLIANCE

I certify that confidential personal identifiers have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: H.O.Chekemian
Hovhannes Onno Chekemian
Deputy Attorney General

Dated: November 4, 2026

DESIGNATION OF TRIAL COUNSEL

Deputy Attorney General Hovhannes Onno Chekemian is hereby designated as trial counsel for this matter.

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: H.O.Chekemian
Hovhannes Onno Chekemian
Deputy Attorney General

Dated: November 4, 2026