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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. :  
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 VANRIE CARRIER, JAMES KING, : Mag. No. 11-6541  
 KINDRICK WHITE, :  
 CHARLES SIMMONS, and :  
 ROBERT FAISON :

I, Jeremiah Reppert, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Secret Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Jeremiah Reppert, Special Agent  
United States Secret Service

Sworn to before me and subscribed in my presence,

February 9, 2011  
Date

at

Newark, New Jersey  
City and State

Honorable Joseph A. Dickson  
United States Magistrate Judge  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

ATTACHMENT A

**Count One: Passing Counterfeit Currency**

From on or about December 17, 2009 through October 5, 2010, in Bergen and Union Counties, in the District of New Jersey, and elsewhere, defendants VANRIE CARRIER, JAMES KING, KINDRICK WHITE, CHARLES SIMMONS, and ROBERT FAISON did:

knowingly, with intent to defraud, agree and conspire with each other and others to pass, utter, publish, sell, and attempt to pass, utter, publish, and sell falsely made, forged, counterfeited, and altered obligations and securities of the United States, namely Federal Reserve Notes, contrary to Title 18, United States Code, Section 472.

In violation of Title 18, United States Code, Section 371.

**Count Two: Falsely Making Counterfeit Currency**

From on or about December 17, 2009 through October 5, 2010, in Essex County, in the District of New Jersey, and elsewhere, defendant VANRIE CARRIER did:

knowingly, with intent to defraud, falsely make, forge, counterfeit, and alter obligations and other securities of the United States, namely Federal Reserve Notes.

In violation of Title 18, United States Code, Section 471 and Section 2.

**Count Three: Selling Counterfeit Currency**

On or about February 3, 2010, in Essex County, in the District of New Jersey and elsewhere, defendant VANRIE CARRIER did:

knowingly buy, sell, transfer, receive, and deliver false, forged, counterfeited, and altered obligations and other securities of the United State, namely Federal Reserve Notes, with intent that same be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473 and Section 2.

ATTACHMENT B

I, Jeremiah Reppert, am a Special Agent with the United States Secret Service. I have knowledge of the following facts based upon my investigation and discussions with other law enforcement personnel and others. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

**Passing Counterfeit Bills**

1. Beginning in or around December 2009, law enforcement agents began an investigation regarding a group of individuals passing counterfeit U.S. currency at New Jersey retail stores such as Target. Video surveillance at the retail stores captured images of the individuals at various retail stores making purchases, on the same dates on which counterfeit \$20, \$50, or \$100 bills were passed at those stores.

2. Law enforcement identified those individuals as defendants VANRIE CARRIER (“CARRIER”), JAMES KING (“KING”), KINDRICK WHITE (“WHITE”), CHARLES SIMMONS (“SIMMONS”), and ROBERT FAISON (“FAISON”).

3. In passing the counterfeit currency, defendants entered retail establishments and made low-dollar value purchases, usually with counterfeit \$50 bills, and received genuine U.S. currency in return as change. The following chart sets forth just some of the dates on which defendants passed counterfeit currency in this manner, oftentimes passing counterfeit bills with the same exact serial numbers:

COUNTERFEIT TRANSACTIONS			
DATE	DEFENDANTS PRESENT	LOCATION	COUNTERFEIT BILLS/ SERIAL NUMBERS
12/17/09	Carrier, White, King	Target – Hackensack	- Carrier: \$50, IB59334089A - White: \$50, IB59334089A - King: \$50, IB59334089A
6/3/10	White and King	Target – Clifton	- White: \$50, GB16043435A - King: \$50, GB16043435A
6/3/10	White and King	Target – Hackensack	- White: \$50, GB16043435A - King: \$50, GB16043435A
6/3/10	White and King	Target – Paramus	- White: \$50, GB16043435A - King: \$50, GB16043435A
6/8/10	White and King	Pathmark – East Brunswick	- White: attempted to pass counterfeit \$50, GF46639685A - King: \$50, GF46639685A
6/8/10	White and King	A&P – East Brunswick	- White: \$50, GF46639685A - King: \$50, GF46639685A
6/22/10	White and King	Target – Hackensack	- White: \$50, IL15752642A - King: \$50, IL15752642A

COUNTERFEIT TRANSACTIONS			
DATE	DEFENDANTS PRESENT	LOCATION	COUNTERFEIT BILLS/ SERIAL NUMBERS
6/22/10	White and King	Target – Paramus	- White: \$50, IL15752642A - King: \$50, IL15752642A
7/20/10	White and King	Target – Hackensack	- White: \$50, EL25527328A - King: \$50, EL25527328A
8/1/10	Carrier and Faison	Target – Vauxhall	- Carrier: \$50, EL25527328A - Faison: \$50, EL25527328A
8/5/10	Carrier, Faison, Simmons	Target – Vauxhall	- Carrier: \$20, IE83967609A - Faison: \$50, EB15455553A - Simmons: \$50, EL25527328A
8/10/10	Carrier, Faison, White	Target – Clifton	- Carrier: \$50, EB15455553A - Faison: \$50, EB15455553A - White: \$50, EB15455553A
8/13/10	Faison	Target – Vauxhall	- Faison: \$50, EB15455553A
9/16/10	Carrier and Faison	Target – Vauxhall	- Carrier: \$50, IA36112629A - Faison: \$50, IA36112629A
9/27/10	Carrier	Target – Vauxhall	- Carrier: \$50, IA36112629A

4. The investigation has determined that from in or around December 2009 through in or around October 2010, defendants passed approximately \$4,020 in counterfeit currency at New Jersey retail stores.

5. Video surveillance at the retail stores at which defendants passed counterfeit bills confirms their presence in the stores on the dates and at the times during which counterfeit currency was passed.

#### **Falsely Making, Forging, Counterfeiting, and Selling Counterfeit U.S. Currency**

6. In or around February 2010, law enforcement agents began an investigation into the production and sale of counterfeit U.S. currency. In or around February 2010, a Confidential Informant (hereinafter the “CI”), provided law enforcement agents with information concerning CARRIER’s production and sale of counterfeit U.S. currency. The CI completed two controlled purchases of counterfeit currency from CARRIER on February 3, 2010 and February 19, 2010.

7. On February 3, 2010, the CI met CARRIER in a pre-arranged location and CARRIER sold approximately \$1,000 in counterfeit U.S. currency to the CI for approximately \$325 in genuine U.S. currency. Earlier that day, CARRIER told the CI, in substance and in part, that he had to go to his sister’s house in Newark, New Jersey (hereinafter the “S.R. Residence”) to “cut bills” prior to meeting with the CI to complete the transaction.

8. After the February 3, 2010 transaction, law enforcement agents recovered the \$1000 in counterfeit currency CARRIER sold to the CI. The \$1000 in counterfeit currency comprised of twenty counterfeit \$50 bills, each of which bore the same serial number.

9. On or about February 19, 2010, CARRIER picked up the CI at a pre-arranged location and drove the CI to the S.R. Residence. When CARRIER and the CI arrived at the S.R. Residence, CARRIER exited the parked car and entered the S.R. Residence. Thereafter, CARRIER exited the S.R. Residence and re-entered the car. While CARRIER and the CI were seated together in the car, CARRIER sold approximately \$1,000 in counterfeit United States currency to the CI for approximately \$325 in genuine United States currency.

10. After the February 19, 2010 transaction, law enforcement agents recovered the \$1,000 in counterfeit currency CARRIER sold to the CI. The \$1,000 in counterfeit currency was comprised of twenty counterfeit \$50 bills, which included three groups of bills bearing different serial numbers.

11. On or about February 22, 2010, following the search of the contents of several trash bags found in front of the S.R. Residence, law enforcement recovered, among other things, printer cartridges, paper clippings, and torn counterfeit bills in \$50 and \$100 denominations. Two of the three serial numbers appearing on the recovered counterfeit bills were identical to the serial numbers that appeared on the counterfeit bills CARRIER sold to the CI on February 19, 2010.

12. On or about March 8, 2010, law enforcement agents executed a search warrant at the S.R. Residence in Newark, New Jersey. Law enforcement seized, among other things, the following items: (1) Canon All-In-One Printer/Scanner/Fax; (2) \$540 in counterfeit currency; (3) an X-Acto cutter; and (4) a counterfeit currency detection pen.