

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 11-_____**
v. : **DATE FILED: June 2, 2011**
RAKEE RUSS : **VIOLATIONS:**
: **18 U.S.C. § 473 (dealing in counterfeit**
: **currency - 2 counts)**
: **18 U.S.C. § 472 (possession of counterfeit**
: **currency with intent to defraud -**
: **3 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 29, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RAKEE RUSS

with intent to defraud, possessed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$260 in counterfeit Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 11, 2011 and February 12, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RAKEE RUSS

knowingly exchanged, transferred and delivered, and aided and abetted the exchange, transfer and delivery of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$1,590 in counterfeit Federal Reserve Notes, with the intent that they be passed and used as true and genuine.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RAKEE RUSS

knowingly exchanged, transferred and delivered falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$1,200 in counterfeit Federal Reserve Notes, with the intent that they be passed and used as true and genuine.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RAKEE RUSS

with intent to defraud, possessed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$1,200 in counterfeit Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

COUNT FIVE

THE GRANT JURY FURTHER CHARGED THAT:

On or about March 26, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RAKEE RUSS

with intent to defraud, possessed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$600 in counterfeit Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney