

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED** _____
SAMUEL OLANDO SUAHA : **VIOLATIONS:**
PYNE SUAHA : **18 U.S.C. § 371 (conspiracy - 1 count)**
: **18 U.S.C. § 472 (passing counterfeit**
: **currency - 16 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. Defendants SAMUEL OLANDO SUAHA and PYNE SUAHA resided in the Eastern District of Pennsylvania.
2. On or about February 7, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants

**SAMUEL OLANDO SUAHA
PYNE SUAHA**

conspired and agreed, together and with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly and with intent to defraud, possess, conceal, pass and utter and attempt to pass and utter falsely made, forged, counterfeited and altered obligations of the United States, in violation of Title 18, United States Code, Section 472.

MANNER AND MEANS

3. It was part of the conspiracy that defendants SAMUEL OLANDO SUAHL and PYNE SUAHL possessed and passed counterfeit \$50.00 bills to make small purchases thereby converting the counterfeit money to genuine currency.

It was further part of the conspiracy that:

4. Defendants SAMUEL OLANDO SUAHL and PYNE SUAHL traveled from the greater Philadelphia area to Pottstown, Pennsylvania with approximately \$2,200 in counterfeit Federal Reserve Notes.

5. Defendants SAMUEL OLANDO SUAHL and PYNE SUAHL made small purchases at retail stores at 16 different stores in Pottstown, Pennsylvania using counterfeit \$50.00 federal reserve notes to pay for modestly priced merchandise with the goal of receiving genuine United States currency as change from the counterfeit \$50.00 Federal Reserve Notes.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants SAMUEL OLANDO SUAHL and PYNE SUAHL committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about February 7, 2011, defendants SAMUEL OLANDO SUAHL and PYNE SUAHL traveled from the greater Philadelphia area to Pottstown, Pennsylvania carrying approximately \$2,200 in counterfeit currency.

2. On or about February 7, 2011, defendants SAMUEL OLANDO SUAHL

and PYNE SUAHL purchased merchandise with counterfeit \$50.00 Federal Reserve Notes at the following Pottstown area stores and received the following amounts of genuine currency as change:

Overt Act	Store Where Merchandise Was Purchased	Cost of Merchandise	Change Received from the Counterfeit Bill
1	Puma's	\$12.00	\$38.00
2	Aldo's	\$31.80	\$18.20
3	Perry Ellis	\$23.99	\$26.01
4	Trader Joe's	\$10.36	\$39.64
5	Gymboree	\$13.99	\$36.01
6	Guess	\$8.00	\$42.00
7	Levi Jeans	\$9.98	\$40.02
8	Esprit	\$10.00	\$40.00
9	Sock-It-To-Socks	\$15.00	\$35.00
10	Banana Republic	\$12.99	\$37.01
11	Toys R Us	\$9.52	\$40.48
12	Justice Socks	\$9.90	\$40.10
13	Goldtoe Socks	\$9.00	\$41.00

14	Toes Scarfs	\$7.99	\$42.01
15	True Religion	\$14.00	\$36.00
16	Perry Ellis (second purchase)	\$27.99	\$22.01

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH SEVENTEEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about February 7, 2011 in the Eastern District of Pennsylvania, defendants

**SAMUEL OLANDO SUAHL
PYNE SUAHL**

with intent to defraud, possessed, passed, uttered, and published, and aided and abetted the possession, passing, uttering, publishing of, falsely made, forged and counterfeit obligations of the United States, that is, counterfeit \$50.00 Federal Reserve Notes, as described below, each transaction constituting a separate count:

Count	Retailer	Cost of Merchandise	Denomination of Counterfeit Currency Used	Genuine U.S. Currency Received as change
2	Puma's	\$12.00	\$50.00	\$38.00
3	Aldo's	\$31.80	\$50.00	\$18.20
4	Perry Ellis	\$23.99	\$50.00	\$26.01
5	Trade Joe's	\$10.36	\$50.00	\$39.64
6	Gymboree	\$13.99	\$50.00	\$36.01
7	Guess	\$8.00	\$50.00	\$42.00
8	Levi Jeans	\$9.98	\$50.00	\$40.42
9	Esprit	\$10.00	\$50.00	40.00
10	Sock-It-To-Socks	\$15.00	\$50.00	\$35.00
11	Banana Republic	\$12.99	\$50.00	\$37.01

12	Toys R Us	\$9.52	\$50.00	\$40.48
13	Justice Socks	\$9.90	\$50.00	\$40.10
14	Goldtoe Socks	\$9.00	\$50.00	\$41.00
15	Toes Scarfs	\$7.99	\$50.00	\$42.01
16	True Religion	\$14.00	\$50.00	\$36.00
17	Perry Ellis (second purchase)	\$27.99	\$50.00	\$22.01

All in violation of Title 18, United States Code, Sections 472 and 2.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES

1. As a result of the violations of Title 18, United States Code, Section 472, as charged in this indictment, defendant

**SAMUEL OLANDO SUAHI
PYNE SUAHI**

shall forfeit to the United States any and all property, real or personal, involved in such offenses, or any property traceable to such property, including, but not limited to a sum of money equal to \$ 1,319.07 in United States Currency.

2. If any of the forfeitable property, as describe above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described above.

In violation of Title 18, United States Code, Section 982 (a)(1).

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY