

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 11-\_\_\_\_\_**

**v.** : **DATE FILED: January 3, 2011**

**EDGAR WINSETT,** : **VIOLATIONS:**  
**JOSE NAVARRO** : **18 U.S.C. § 371 (conspiracy to deal in**  
: **counterfeit currency - 1 count)**  
: **18 U.S.C. § 471 (manufacturing counterfeit**  
: **currency - 2 counts)**  
: **18 U.S.C. § 472 (possession of counterfeit**  
: **currency - 2 counts)**  
: **18 U.S.C. § 473 (dealing in counterfeit**  
: **currency - 2 counts)**  
: **18 U.S.C. § 2 (aiding and abetting)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about October 17, 2011, to on or about November 17, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants

**EDGAR WINSETT, and  
JOSE NAVARRO**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, with intent to defraud, to make counterfeited obligations of the United States, and to deal knowingly in counterfeited obligations of the United States, that is, counterfeit \$20 and \$50 United States Federal Reserve Notes, with the intent that the same be passed, published, and used as true and genuine, in violation of Title 18, United States Code, Sections 471 and 473.

## **MANNER AND MEANS**

2. It was part of the conspiracy that defendants EDGAR WINSETT and JOSE NAVARRO made and forged counterfeit \$20 and \$50 United States Federal Reserve Notes.

It was further a part of the conspiracy that:

3. Defendants EDGAR WINSETT and JOSE NAVARRO sold counterfeit \$20 and \$50 United States Federal Reserve Notes to a Confidential Informant (CI) known to the grand jury in an amount totaling approximately \$10,820 in return for genuine United States currency.

## **OVERT ACTS**

In furtherance of the conspiracy, defendants EDGAR WINSETT and JOSE NAVARRO committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about October 17, 2011, defendant WINSETT directed that the CI obtain sample counterfeit \$20 Federal Reserve Notes from defendant NAVARRO. WINSETT discussed that, if the CI approved of the samples, the CI would pay WINSETT genuine currency in exchange for counterfeit \$20 Federal Reserve Notes.

2. On this same date, defendant NAVARRO gave the CI \$100 in counterfeit \$20 Federal Reserve Notes as samples.

3. On October 20, 2011, the CI paid defendant WINSETT \$500 in genuine currency to begin the production of counterfeit Federal Reserve Notes.

4. On October 24, 2011, the CI received \$4,720 in counterfeit \$20 Federal

Reserve Notes from defendant NAVARRO.

5. On November 2, 2011, the CI asked defendant NAVARRO to make counterfeit \$100 Federal Reserve Notes and NAVARRO agreed.

6. On November 3, 2011, the CI paid defendant WINSETT \$1000 in genuine currency to print counterfeit \$50 Federal Reserve Notes.

7. On November 7, 2011, the CI received \$6,000 in counterfeit \$50 Federal Reserve Notes from defendants WINSETT and NAVARRO.

8. On November 17, 2011, the CI called defendant WINSETT and asked for more time to pay WINSETT. WINSETT agreed.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 24, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDGAR WINSETT, and  
JOSE NAVARRO,**

with intent to defraud, falsely made, forged, and counterfeited, and aided and abetted the making forging, and counterfeiting of, obligations of the United States, that is, approximately \$4,720 in counterfeit \$20 Federal Reserve Notes.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 24, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDGAR WINSETT, and  
JOSE NAVARRO,**

with intent to defraud, possessed and uttered, and aided and abetted the passing and uttering of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$4,720 in counterfeit \$20 Federal Reserve Notes.

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

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 24, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**EDGAR WINSETT, and  
JOSE NAVARRO**

knowingly sold and transferred counterfeit Federal Reserve Notes, that is, approximately \$4,720 of counterfeit \$20 Federal Reserve Notes, with the intent that the same be passed, published, and used as true and genuine.

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 7, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDGAR WINSETT, and  
JOSE NAVARRO,**

with intent to defraud, falsely made, forged, and counterfeited, and aided and abetted the making forging, and counterfeiting of, obligations of the United States, that is, approximately \$6,000 in counterfeit \$50 Federal Reserve Notes.

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 7, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDGAR WINSETT, and  
JOSE NAVARRO,**

with intent to defraud, possessed and uttered, and aided and abetted the passing and uttering of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$6,000 in counterfeit \$50 Federal Reserve Notes.

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

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 7, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**EDGAR WINSETT, and  
JOSE NAVARRO**

knowingly sold and transferred counterfeit Federal Reserve Notes, that is, approximately \$6,000 of counterfeit \$50 Federal Reserve Notes, with the intent that the same be passed, published, and used as true and genuine.

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

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 371, 471, 472, and 473 set forth in this indictment, defendants

**EDGAR WINSETT, and  
JOSE NAVARRO**

shall forfeit to the United States of America any and all property that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offenses, including, but not limited to, \$1500 in currency, any property involved in such offenses, and any property traceable to such property.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (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 be

divided without difficulty; it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 492 and  
Title 28, United States Code, Section 2461.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**



**ZANE DAVID MEMEGER**  
United States Attorney