

AO 91 (Rev. 01/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
District of Rhode Island

United States of America

v.

ANTHONY CHADHEEN

*Defendant*

Case No.

1:11 MJ243A

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 10/28/2011 in the county of \_\_\_\_\_ in the \_\_\_\_\_ District of  
Rhode Island, the defendant violated 18 U. S. C. § 514(a)(2), an offense described as follows:

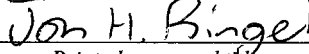
that he did, with intent to defraud, attempt to pass, utter, and present as an actual security issued under the authority of the United States, a false and fictitious instrument, document and other items.

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Jon H. Ringel, USSS

☒ Continued on the attached sheet.

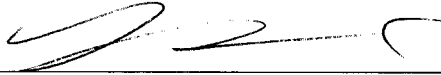
  
Complainant's signature

  
Printed name and title

Sworn to before me and signed in my presence.

Date:

10/28/11

  
Judge's signature

City and state: Providence, Rhode Island

LINCOLN D. ALMOND, U.S. Magistrate Judge  
Printed name and title

## **AFFIDAVIT**

I, Jon H. Ringel, upon oath, do depose and state:

1. I am a special agent with the United States Secret Service (USSS) and have been continuously employed in this capacity for the past fifteen years. I am currently assigned to the Providence Resident Office. My responsibilities include investigating financial crimes that include, but are not limited to, counterfeiting of U.S. currency, financial institutional fraud, false identification documents, credit card and access device fraud, computer and telecommunications fraud, fraudulent electronic funds transfers, and money laundering. I have conducted numerous investigations into bank fraud and identity theft schemes. Through my training, education, and experience, I have become familiar with the manner in which those involved in such schemes operate, and I know that they often use electronic communications to coordinate their illegal activities.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant charging ANTHONY CHADHEEN, and ALVIN PENNUE, aka "Sam", with attempting to pass Fictitious Obligations of the United States, in violation of 18 U.S.C. § 514.

3. The facts contained in this affidavit are based upon my personal knowledge and information provided to me by others involved in this investigation who either have direct or hearsay knowledge of the subject. This affidavit does not contain all of the facts gathered during the course of this investigation.

4. This case involves a so-called "black money" scheme to defraud. Black money schemes are schemes to defraud whereby individuals attempt to fraudulently obtain money from a victim by persuading him that large quantities of banknote-sized paper in that individual's

possession is really U.S. currency which has been dyed black, typically to avoid detection by customs. The victim is persuaded, with the prospect of sharing in the proceeds, to supply real currency in order to facilitate the chemical reaction that will remove the black covering that overlays the supposedly genuine black currency. In reality, except for a few genuine FRNs used to advance the scheme, the black "money" is usually simply black paper.

5. On October 11, 2011, a Massachusetts resident ("Victim 1"), contacted the USSS Providence Resident Office to report that he was defrauded out of \$100,000 of cash after he was solicited by three black male Liberian suspects in a black money fraud scheme. Victim 1 reported that, after a two month friendship with the three suspects, he was defrauded out of \$100,000 of cash on 10/07/11 at the Providence Downtown Marriott.

6. On October 17, 2011, Resident Agent In Charge (RAIC) Thomas Powers and I interviewed Victim 1 in Fall River, MA. The victim provided us the details of a three month courtship with three Liberian suspects whom he identified as Tomba "LNU", Alex "LNU", and Tony "LNU". He described the suspect's illicit black money scheme in detail where in Victim 1 was to produce \$100,000 of his own money in an effort to make an extra \$100,000 by cleaning black money through the use of chemicals. During the interview, Victim 1 stated that he was an auto body shop owner. He further stated that, two to three months ago, he was approached by a Liberian black male subject who had seen Victim 1 driving his Lamborghini auto on Interstate 195 in Fall River, MA. Victim 1 stated that the subject approached him at McDonalds in Fall River, MA. The subject identified himself as Tomba LNU and asked him if he would like to sell his vehicle. Tomba "LNU" reportedly offered Victim 1 \$100,000 in cash for the vehicle and also gave him his phone number 401-649-6435. Victim 1 continued that a week later he met Tomba "LNU" at Opa Restaurant in Providence, RI. He continued that Tomba "LNU" still expressed

interest in purchasing his vehicle and mentioned that he should meet the President of Liberia's son. Victim 1 related that Alex made references to the war in Liberia, his father, the President of Liberia who was put into exile.

7. It was at this time that Tomba first made mention of black money. He stated that he and associates had access to money but it was black money and they wanted to eventually show him something regarding it. He continued that the subjects made mention of a Jewish guy who had the black money in a storage facility.

8. Victim 1 stated that he met with the subjects a month and a half ago. During this meeting he was introduced to a third subject known as Tony LNU, the driver for the President of Liberia, in a Range Rover. He described Tony LNU as a more light skinned black male who was 5' 6" and 165 lbs. He continued that while in the Range Rover, Tony "LNU" stated that he wanted to show Victim 1 something and took a \$100 genuine U.S. Federal Reserve Note (FRN) note from Victim 1. Victim 1 described Tony "LNU" as utilizing aluminum foil, vials of chemicals, rubber gloves, water, and two blackish purple pieces of paper, which had the same size and shape as FRNs, in a physical demonstration to show how his \$100 genuine note could produce two extra \$100 genuine notes. Victim 1 reported that Tony "LNU" handed him back the initial genuine FRN, and two additional genuine \$100 FRNs. Tony told Victim 1 to take the two additional \$100 FRNs to a bank to see if the note was real. Victim 1 advised that weeks later he expressed interest in getting involved with the subjects by providing \$100,000 in cash for a profit. The subjects told Victim 1 that they would turn his \$100,000 into \$300,000.

9. Victim 1 advised that the subjects agreed to accept his \$100,000 in cash for a black money conversion but stated that the action would have to take place at a hotel where there were plenty of cameras. Victim 1 continued that the previous Friday, he withdrew \$150,000 of his

own cash from Webster Bank in Somerset, MA, and placed it afterwards in a safe deposit box in the Notre Dame Credit Union in Fall River, MA. Victim 1 advised that he was also instructed by the subjects to purchase a safe with two keys which he bought at Staples in Seekonk, MA.

10. Victim 1 also stated that on Friday, 10/7/2011, he was dropped off at the Providence Downtown Marriott with \$100,000 of cash in his backpack and proceeded to rent a room there.

11. Victim 1 continued that at the hotel he met with Tomba LNU and Tony LNU, who brought in a suitcase of chemicals and bags filled with black money. He continued that the subjects started the cleaning process of his money utilizing aluminum foil, two black jugs of chemicals to eventually use all 1000 of his \$100 genuine notes in order to facilitate the chemical reaction needed to remove the black covering from the black "money". He described them as dunking the money into chemicals, pouring a powdery substance, and placing aluminum foil around each stack. He recalled at a certain point the subjects went into the hotel room's bathroom to complete the money cleaning process and later put two big bricks of what the victim believed to be \$150,000 into his safe. Victim 1 was told by the subjects that they would have to wait for a chemical reaction to take place. They all reportedly left the room to go to a convenience store for drinks. During the time away from the hotel the subjects received a phone call and they advised Victim 1 that they had to leave. Victim 1 advised he was dropped off at the hotel and told that the money was still in the safe and he had the room key and safe key. Victim 1 continued that he waited five hours for the subjects to return and then finally opened the safe. He opened one aluminum foil wrapped brick and realized that the stack was entirely black construction paper and Tony LNU had switched his money sometime in the black money cleaning process. He reportedly attempted to call them but stated that the subject's phone was off.

12. On 10/17/2011, Victim 1 also identified "Tomba" from a photo array. The photograph identified by Victim 1 was Saah Johnson. Johnson has been a suspect in a USSS and Massachusetts State Police investigation into a Black Money ring operating in Massachusetts. During this operation, on 1/24/2011, CHADHEEN was arrested by USSS and the Massachusetts State Police for state larceny charges. These charges were later dropped by the state District Attorney's office, so that the federal investigation could proceed.

13. Continuing on 10/17/2011, at the conclusion of interview, Victim 1 provided myself with the two stacks (brick-shaped) of black paper wrapped in aluminum that was utilized in the black money fraud scheme exchange at the Providence Downtown Marriott.

14. On October 18, 2011, a confidential source (CS) contacted the USSS Providence Resident Office to report that he was being solicited by two African males claiming to from Sierra Leone in a Black Money scheme.

15. On October 19, 2011, myself and RAIC Thomas Powers interviewed the confidential source in Attleboro, MA. CS reported that the two African male subjects were interested in doing business with him regarding black money and met with him on two previous occasions. He stated that during a meeting on 10/15/11, the suspects involved him in a demonstration of the black money cleaning process in a vehicle outside the Providence Marriott, RI. He continued that the subjects identified SAM "LNU" and TONY "LNU" first inquired with the confidential source if he wanted to make money. He continued that one of the subjects showed him an American passport with a Visa and made mention of genuine U.S. currency that was sent to them from Sierra Leone that was blackened.

16. CS stated that he gave the two subjects a \$20 genuine FRN note, who proceeded to perform a demonstration where the \$20 genuine U.S. FRN note changed the black money into

two separate \$20 FRN notes. He also advised that one of the subjects, identified only as Sam LNU had been recently calling him using the cellular phone number 317-209-7331. He stated that Sam "LNU" requested a second meeting and demonstration with the confidential source and mentioned having a Hispanic friend to perform the next demonstration.

17. On 10/20/11, the confidential source placed a consensual phone call with Sam "LNU" in order to arrange for a meeting with him and Tony "LNU" for a second demonstration to occur involving \$100 denominations at a restaurant in Warwick, RI. During the consensual phone call, the confidential source made mention of a fellow work associate who would be interested in doing business with the black money.

18. On the same date, an investigative operation involving a lunch meeting of Sam "LNU" and Tony "LNU" with the confidential source and SA Fred Mitchell, acting in an undercover (UC) capacity, occurred at On the Border Restaurant in Warwick, RI. Following the lunch meeting, UC SA Mitchell was driven by suspect Tony "LNU" in his vehicle around the Warwick Mall parking location. During the drive, U/C SA Fred Mitchell handed the suspect Tony "LNU" a genuine \$100 FRN note and was then was provided a black money cleaning demonstration involving chemicals, aluminum foil and hot water performed to change his \$100 genuine note into three \$100 genuine notes. U/C SA Mitchell received three \$100 genuine notes following the demonstration. During the course of U/C SA Mitchell's meeting with suspects Sam "LNU" and Tony "LNU", a conversation occurred between the parties regarding the suspect's possible purchase of a firearm. All conversation between U/C SA Fred Mitchell and suspects Sam "LNU" and Tony "LNU" were recorded by consensual intercepts. Video surveillance footage was also obtained of the two main suspects entering and departing the restaurant.

19. Tony LNU arrived at the meeting at the On the Border Restaurant driving a 2011 Jeep Cherokee, color gold, MA reg. #568 NL4. Agents were able to trace these plates as belonging to Avis Rental cars, and which had been rented at TF Green Airport in Warwick, RI.

20. On 10/22/11, a consensual phone was placed by U/C SA Mitchell from his residence in Norfolk County, MA to Sam "LNU" and Tony "LNU" at the SAM "LNU" cell phone number, 317-209-7331. During the conversation the suspects expressed continued interest in meeting with U/C SA Mitchell for a black money cleaning and conversion involving \$100,000 to be supplied by SA Mitchell.

21. On 10/24/11, Victim 1 responded to the USSS Providence Resident Office. After viewing surveillance and audio footage of the investigative operation held on 10/20/11, Victim 1 identified one of the suspects in both footages as TONY "LNU", one of the Liberian subjects who was responsible for his loss of \$100,000 in cash through the black money scheme that occurred at the Providence Downtown Marriott on 10/07/11.

22. On 10/25/11, a consensual phone call was made by U/C SA Mitchell to Tony "LNU" to his cellular phone number 347-525-1796. During this conversation, U/C SA Mitchell set up a meeting at Chipotle Restaurant in Cranston, RI with the targets to discuss further interest in black money cleaning and conversion involving \$100,000 and possible firearms purchases.

23. On the same date, an investigative operation involving a lunch meeting with SAM "LNU" and TONY "LNU" and U/C SA Mitchell occurred at the Chipotle Restaurant in the Garden City shopping area in Hillside Avenue in Cranston, RI. During the operation incriminating statements were obtaining regarding the subjects involvement in the sale of black money and purchase of firearms. U/C SA Mitchell displayed various photographs of firearms to the subjects from his iPhone at the Chipotle Restaurant. All conversations between U/C SA Fred



Mitchell and suspects SAM "LNU" and TONY "LNU" were recorded by consensual intercepts. Video surveillance footage was also obtained of SAM "LNU" and TONY "LNU" were recorded by consensual intercepts. Video surveillance footage was also obtained of the two main suspects and the U/C SA Mitchell as they walked around the Garden City Cranston shopping area.

24. On the same date, U/C SA Mitchell viewed a Rhode Island Drivers License photograph of a previous subject who was arrested in by the USSS Boston Field Office in a Black Money scheme arrest operation on 01/25/11. U/C SA Fred Mitchell identified TONY "LNU" as ANTHONY CHADHEEN (DOB 03/13/78).

25. On October 27, 2011, I contacted Avis Security personnel Dennis Letts to inquire about rental vehicle information on the vehicle utilized by ANTHONY CHADHEEN and SAM "LNU" in both previous investigative operations, a 2011 Gold Jeep Cherokee with Massachusetts Plates #568 NL4. The results of the inquiry revealed that the vehicle had been rented at the TF Green Avis location to driver ANTHONY CHADHEEN with an additional driver reported as Saah Johnson.

26. On October 27, 2011, SA Mitchell spoke with Sam LNU, and told him that his \$100,000 in cash would be arriving at his bank in Boston.

27. On October 28, 2011, SA Mitchell spoke with Chadheen ("Tony"), and told him he was ready to meet him with the \$100,000. SA Mitchell (still acting in an undercover capacity) met with Tony and Sam, and discussed the black money scheme. Both subjects told SA Mitchell that they would pay him an additional \$100,000 if they could use SA Mitchell's \$100,000 to facilitate removing the black covering on the supposedly real currency.

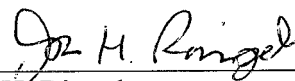
28. Sam suggested that they go and purchase a safe, which was necessary to facilitate the chemical changes. Sam and SA Mitchell drove to a local Staples store, where Sam purchased

a safe. The two then walked to a nearby restaurant, where they met Tony, who arrived in the gold Cherokee. While still in the restaurant parking lot, Tony opened up the back hatch of the vehicle, and opened a suitcase, revealing stacks or "bricks" of paper in the shape of FRNs.

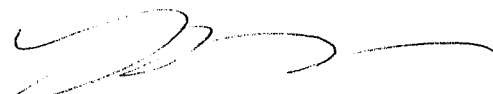
29. The subjects were both arrested at this time. The automobile was searched, and six stacks or bricks of the black money was seized from the suitcase. Also, two jugs containing unknown liquids , and 1 large bag of a powdery substance were seized from the vehicle.

30. Both individuals were advised of their Miranda rights, and questioned. "Sam" identified himself as Alvin Pennue, and admitted that he knew that the black bricks of FRN-shaped paper were nothing more than construction paper.

31. Based upon the foregoing, I respectfully submit that there is probable cause to believe that ANTHONY CHADHEEN, aka "Tony", ALVIN PENNUE, aka SAM "LNU" did, with intent to defraud, attempt to pass a false or fictitious instrument by falsely representing mere paper to be an actual security, a U.S. Federal Reserve Note, issued under the authority of the United States, in violation of 18 U.S.C. § 514.

  
\_\_\_\_\_  
Jon H. Ringel  
Special Agent  
United States Secret Service

Subscribed and sworn to before  
me this 28th day of October, 2011 .  
at Providence, Rhode Island.

  
\_\_\_\_\_  
Lincoln D. Almond  
United States Magistrate Judge

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☐ INDICTMENT ☒ COMPLAINT CASE NO. \_\_\_\_\_Matter Sealed: ☐ Juvenile ☐ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added  
☐ Indictment ☐ Charges/Counts Added  
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person FURNISHING INFORMATION ON THIS FORM  
PETER F. NERONHA  
☒ U.S. Atty ☐ Other U.S. Agency  
Phone No. \_\_\_\_\_

Name of Asst. U.S. Attorney (if assigned) TERRENCE P. DONNELLY

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

U.S. SECRET SERVICE

☐ person is awaiting trial in another Federal or State Court (give name of court)☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded underSHOW  
DOCKET NO.MAG. JUDGE  
CASE NO.

Place of offense RHODE ISLAND County

USA vs.

Defendant: ANTHONY CHADHEEN

A

[

B  
D

S

**REDACTED**Alien  
(applicable)Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date 10/28/2011 or Date Transferred to Federal Custody \_\_\_\_\_

☒ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): \_\_\_\_\_

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	18 U.S.C. Section 514(a)(2)	Passing a Fictitious Obligation of the United States	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Maximum Penalties: 25 yrs imprisonment;		<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	5 yrs supervised release; \$250,000 fine;		<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	\$100 special assessment.	Estimated Trial Days: 3	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor