

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

- 01

UNITED STATES OF AMERICA



19 115 JJM

Cr. No. _____

v.

DOMINIQUE GOLDEN,
a/k/a Raquel Golden,
a/k/a Emily Greco,
a/k/a Mellisa Moore,
a/k/a Raquel Roberts,

and

SADAE MILLS,
Defendants.

Violations:

18 U.S.C. § 1349 (Conspiracy)

18 U.S.C. § 1341 (Mail Fraud)

18 U.S.C. § 1343 (Wire Fraud)

Forfeiture

FILED
OCT -3 2019
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Commit Mail Fraud - 18 U.S.C. § § 1349, 1341)

Introduction

At all times relevant to this Indictment:

1. Dominique GOLDEN (GOLDEN) resided in the Northern District of Georgia and the Southern District of Texas.
2. Sadae MILLS (MILLS) resided in the Southern District of Texas.
3. RAQ Gold Services LLC was a domestic limited liability company organized under the laws of the State of Georgia on or about September 22, 2017 by

GOLDEN.

4. EMGREC Enterprises LLC was a domestic limited liability company organized under the laws of the State of Georgia on or about March 26, 2018 by GOLDEN, using an alias, Emily Greco.

5. Optimized Moore & More Solutions Inc. was a company that was incorporated under the laws of the State of Georgia on September 20, 2108 by GOLDEN, using an alias, Mellisa Moore.

6. P.T. was a resident of Wakefield, Rhode Island. P.T. was born in 1943.

7. S.B. was a resident of Conesus, New York. S.B. was born in 1937.

8. M.B. was a resident of Fayetteville, Arkansas. M.B. was born in 1958.

9. K.B. was a resident of Colorado Springs, Colorado. K.B. was born in 1963.

10. A.B. was a resident of Greensboro, North Carolina. A.B. was born in 1941.

11. C.R. was a resident of Excelsior Springs, Missouri. C.R. was born in 1948.

12. D.P. was a resident of Concord, North Carolina. D.P. was born in 1945.

13. B.P. was a resident of St. Petersburg, Florida. B.P. was born in 1947.

14. A money order is a paper document, similar to a check, used for making payments. Money orders are prepaid, so they are only issued after a buyer pays for the money order with cash or another form of guaranteed funds. Money orders can be purchased from various outlets, including the United States Postal Service (USPS), MoneyGram International Inc. (MoneyGram), and the Western Union Company

(Western Union).

15. Navy Federal Credit Union (NFCU) was credit union that was headquartered in Vienna, Virginia.

16. BB&T Bank (BB&T) was a bank that was headquartered in Winston-Salem, North Carolina.

17. J.P. Morgan Chase Bank (JP Morgan) was a bank that was headquartered in New York, New York.

18. Wells Fargo Bank (Wells Fargo) was a bank that was headquartered in San Francisco, California.

19. SunTrust Bank (Sun Trust) was a bank that was headquartered in Atlanta, Georgia.

20. Bank of America (BoA) was a bank that was headquartered in Charlotte, North Carolina.

The Conspiracy

21. Beginning on a date unknown to the Grand Jury but not later than December 2017 and continuing until on or about September 11, 2019, in the District of Rhode Island, and elsewhere, the defendants,

DOMINIQUE GOLDEN and SADA E MILLS,

did knowingly, willfully, and unlawfully combine, conspire, and agree with each other and other persons, known and unknown to the Grand Jury, to commit mail fraud, that is, to knowingly and with intent to defraud, devise, and intend to devise a scheme to defraud and obtain money and property from others by means of materially false and

fraudulent pretenses, representations, and promises, and did cause to be transmitted certain mailings by U.S. mail and by private and interstate commercial carrier, and did remove mailings therefrom, for the purpose of executing the scheme and artifice.

The Object of the Conspiracy

22. The object of the conspiracy was for the defendants GOLDEN and MILLS, and their co-conspirators, to meet victims on-line and cultivate a relationship of trust with those victims, and thereafter, abuse the victims' trust by misrepresenting that they were in need of financial assistance from the victims. GOLDEN and MILLS, and their co-conspirators thereby unlawfully enriched themselves by fraudulently inducing the victims to send money to GOLDEN and MILLS, and others.

Manner and Means of the Conspiracy

23. One or more of GOLDEN's and MILLS' unindicted co-conspirators contacted victims, primarily elderly individuals, throughout the United States using internet and application-based communication platforms and by telephone, falsely identified themselves, cultivated a relationship of trust with the victims, and advised the victims that money was needed to address a financial issue.

24. One or more members of the conspiracy contacted P.T. on the online game, Words with Friends, and identified himself as "General Matthew Weyer." General Weyer told P.T. that he was stationed with the U.S. Army in Afghanistan and asked P.T. for money that he said he needed to ship a box to the United States. As requested, beginning in or about March 2018 and continuing through in or about February 2019, P.T. sent checks and wire transfers totalling \$585,346 to GOLDEN,

MILLS, and other co-conspirators.

25. One or more members of the conspiracy contacted S.B. on the online game, Words with Friends, and identified himself as "Mark Kent." Kent claimed that he was a diplomat who worked for General Stephen Townsend, and money was needed to ship General Townsend's belongings to the United States. At his request, in July 2018 and August 2018, S.B. sent checks totalling \$115,935.07 to GOLDEN and other co-conspirators.

26. One or more members of the conspiracy contacted M.B. on Facebook and identified himself as "Aaron Makovic." Makovic asked M.B. to loan him money so he and his daughter could return home from overseas. As a result, on or about June 18, 2018, M.B. mailed a check for \$70,367.00 to EMGREC Enterprises LLC, a company established by GOLDEN using an alias, Emily Greco.

27. One of more members of the conspiracy contacted K.B. on the dating site, Match.com, and identified himself as "Robert Stoky." Stoky stated he was an environmental consultant and had won a contract to conduct a "clean-up" job in New York. "Stoky" claimed that he did not have enough funds to cover the up-front costs associated with the job, asked K.B. for money. He told K.B. that after the job was finished, he would pay her back and move to Colorado to be with her. As a result, beginning on or about May 1, 2018 and continuing through June 26, 2018, K.B. mailed four personal checks totaling \$39,500.00 to Raquel Golden, an alias used by GOLDEN.

28. One of more members of the conspiracy contacted A.B. on Facebook and identified himself as her deceased father's cousin "Aaron." Aaron stated he was

stationed on an oil rig and needed money to return home with his daughter. As a result, beginning on or about July 27, 2018 and continuing through July 30, 2018, A.B. mailed two checks totaling \$15,000 to EMGREC Enterprises LLC, a company established by GOLDEN, using one of her aliases, Emily Greco.

29. One of more members of the conspiracy contacted C.R. on Facebook messenger and identified himself as "General James Mattis." General Mattis displayed romantic intentions towards C.R., and explained that in order for him to see her, C.R. would have to obtain and pay for a security clearance. As a result, beginning on or about March 22, 2018 and continuing through April 18, 2018, C.R. mailed 22 money orders totaling \$20,301.00 to Raquel Golden, an alias used by GOLDEN.

30. One of more members of the conspiracy contacted D.P. on the dating site, Christian Mingle, and identified himself as "Paul Pellegrino." Pellegrino told D.P. that he was involved in the business of constructing bridges, was trying to sell his company, and needed money to pay his employees. As a result, beginning on or about May 23, 2018 and continuing through July 18, 2018, D.P. sent four checks totaling \$33,200.00 by mail to Emily Greco, an alias of GOLDEN.

31. One of more members of the conspiracy contacted B.P. on Our Time, a dating site for singles over 50, and identified himself as "Derek Gore." "Derek" stated that he was currently in China where he worked in the oil business and that he needed money to pay his taxes to leave China and return to the United States. As a result, beginning on or about May 31, 2018 and continuing through on or about June 18, 2018, B.P. sent six wire transfers totaling \$330,000.00 to bank accounts in the names of

EMGREC Enterprises, Optimized Moore & More Solutions Inc., and RAQ Gold

Services, accounts opened by GOLDEN using her name or the names of her aliases.

32. From approximately February 2018 through December 2018, GOLDEN, in her name and in the names of her aliases and the companies established in the names of her aliases, received at least \$1,568,815.54 in money orders, checks, and wire transfers from victims. From approximately April 2018 through June 2018, MILLS received at least \$34,710 in checks and wire transfers from victims.

Acts in Furtherance of the Conspiracy

33. On or about December 13, 2017, GOLDEN opened BB&T account # [REDACTED] 2948, in the name RAQ Gold Services.

34. On or about January 9, 2018, GOLDEN opened BB&T account # [REDACTED] 8347, in the name Dominique GOLDEN.

35. On or about February 5, 2018, GOLDEN opened NFCU account # [REDACTED] 8548, in the name Dominique GOLDEN, using a fraudulent social security number, [REDACTED] 3326.

36. On or about February 20, 2018, GOLDEN opened NFCU account # [REDACTED] 9698, in the name RAQ Gold Services, using a fraudulent social security number, [REDACTED] 3326.

37. On or about March 13, 2018, GOLDEN obtained a post box at UPS Store, at 3535 Peachtree Road, Atlanta, Georgia, which allowed GOLDEN and her co-conspirators to use the address 3535 Peachtree Road, Ste 520, Atlanta, Georgia, 30326 as an address for victims to send money.

38. On or about April 14, 2018, GOLDEN, using the alias Emily Greco, opened Wells Fargo account # [REDACTED] 1370, in the name EMGREC Enterprises, using a fraudulent Illinois Driver's License # [REDACTED] 1171 and a fraudulent social security number, [REDACTED] 1583.

39. On or about April 16, 2018, GOLDEN, using the alias Emily Greco, and MILLS, as co-signers, opened SunTrust account # [REDACTED] 6821, in the name EMGREC Enterprises, using a fraudulent Illinois DL # [REDACTED] 1171.

40. On or about April 24, 2018, GOLDEN, using the alias Emily Greco, opened BoA account # [REDACTED] 6735, in the name EMGREC Enterprises, using a fraudulent Illinois driver's license # [REDACTED] 1171.

41. On or about April 24, 2018, GOLDEN, using the alias Emily Greco, opened Wells Fargo account # [REDACTED] 7661, using a fraudulent social security number, [REDACTED] 3326.

42. On June 18, 2018, GOLDEN, using the alias Emily Greco, opened Wells Fargo account # [REDACTED] 0782, in the name EMGREC Enterprises, using a fraudulent Illinois Driver's License # [REDACTED] 1171 and a fraudulent social security number, [REDACTED] 3326.

43. On or about October 1, 2018, GOLDEN, using her alias Mellisa Moore, obtained a post box at UPS Store, at 925B Peachtree St. NE, Atlanta, Georgia, which allowed GOLDEN and her co-conspirators to use the address 925B Peachtree St. NE #2041, Atlanta, George, 30309 as an address for victims to send money.

44. On or about October 1, 2018, GOLDEN, using the alias Mellisa MOORE,

opened Wells Fargo account # [REDACTED] 7514, in the name Optimized Moore & More Solutions, using a fraudulent Texas DL # [REDACTED] 7462 and a fraudulent Social Security number of [REDACTED] 4787.

45. On or about October 3, 2018, GOLDEN, using the alias Mellisa MOORE, opened BoA account # [REDACTED] 1091, in the name Optimized Moore & More, using a fraudulent Texas Driver's License # [REDACTED] 7462.

46. On or about October 3, 2018, GOLDEN, using the alias Mellisa MOORE, opened BoA account # [REDACTED] 1109, in the name Optimized Moore & More Solutions, using a fraudulent Texas Driver's License # [REDACTED] 7462.

All in violation of Title 18, United States Code, Sections 1349 and 1341.

COUNTS TWO - TEN

(18 U.S.C. § 1341 -Mail Fraud)

47. The allegations contained in paragraphs 1 through 20 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

Scheme and Artifice to Defraud

48. Beginning on a date unknown to the Grand Jury but not later than December 2017 and continuing until on or about September 11, 2019, in the District of Rhode Island, and elsewhere, the defendants,

DOMINIQUE GOLDEN and SADA E MILLS,

did knowingly and with intent to defraud, devise, and intend to devise a scheme to defraud and obtain money and property from others by means of materially false and

fraudulent pretenses, representations, and promises, and did cause to be transmitted certain mailings by U.S. mail and by private and interstate commercial carrier, and did remove mailings therefrom, for the purpose of executing the scheme and artifice.

Object of the Scheme to Defraud

49. The object of the scheme to defraud was the same as the object of the conspiracy to commit mail fraud. Accordingly, paragraph 22 is re-alleged and incorporated by reference as if fully set forth herein.

Manner and Means of the Scheme to Defraud

50. The manner and means of the scheme to defraud were the same as the manner and means of the conspiracy to commit mail fraud. Accordingly, paragraphs 23 through 32 are re-alleged and incorporated by reference as if fully set forth herein.

Execution of the Scheme to Defraud

51. On or about the dates set forth below, in the District of Rhode Island and elsewhere, for the purpose of executing the scheme and artifice, and attempting to do so, did cause to be transmitted certain mailings by U.S. mail and by private and interstate commercial carrier, and did remove mailings therefrom, for the purpose of executing the scheme and artifice, each mailing constituting a separate count, as more particularly described below:

Count	Defendant	Date	Sender	Amount	Description
2	GOLDEN	3/22/2018	C.R.	\$1,000	Postal Money Order mailed to Raquel Golden
3	MILLS	4/26/2018	P.T.	\$29,000	Check # 1003 mailed to Sadae MILLS

Count	Defendant	Date	Sender	Amount	Description
4	GOLDEN	4/26/2018	P.T.	\$26,409	Check # 1004 mailed to Dominique GOLDEN
5	GOLDEN	5/1/2018	K.B.	\$9,000	Check # 3679 mailed to Raquel Golden
6	GOLDEN	6/19/2018	M.B.	\$70,367.00	Check #1015 mailed to EMGREC Enterprises LLC
7	GOLDEN	6/22/2018	D.P.	\$10,000	Check # 3073 mailed to Emily Greco
8	GOLDEN	7/30/2018	A.B.	\$11,000	Check #6609 mailed to EMGREC Enterprises LLC
9	GOLDEN	8/6/2018	S.B.	\$53,878.54	Check #1205 mailed to Raquel Golden
10	GOLDEN	9/13/2018	P.T.	\$42,000	Check # 108 mailed to Emily Greco

All in violation of Title 18, United States Code, Section 1341.

COUNTS ELEVEN - SIXTEEN

(18 U.S.C. § 1343 -Wire Fraud)

52. The allegations contained in paragraphs 1 through 20 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

Scheme and Artifice to Defraud

53. Beginning on a date unknown to the Grand Jury but not later than December 2017 and continuing until on or about September 11, 2019, in the District of Rhode Island, and elsewhere, the defendants,

DOMINIQUE GOLDEN and SADA E MILLS,

did knowingly and with intent to defraud, devise, and intend to devise a scheme to defraud and obtain money and property from others by means of materially false and

fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, through the transmission in interstate commerce of wire communications.

Object of the Scheme to Defraud

54. The object of the scheme to defraud was the same as the object of the conspiracy to commit mail fraud. Accordingly, paragraph 22 is re-alleged and incorporated by reference as if fully set forth herein.

Manner and Means of the Scheme to Defraud

55. The manner and means of the scheme to defraud were the same as the manner and means of the conspiracy to commit wire fraud. Accordingly, paragraphs 23 through 32 are re-alleged and incorporated by reference as if fully set forth herein.

Execution of the Scheme to Defraud

56. On or about the dates set forth below, in the District of Rhode Island and elsewhere, for the purpose of executing the scheme and artifice, and attempting to do so, did transmit and cause to be transmitted certain wire communications in interstate and foreign commerce, for the purpose of executing the scheme and artifice, each wire communication constituting a separate count, as more particularly described below:

Count	Defendant	Date	Sender	Amount	Description
11	GOLDEN	3/8/2018	P.T.	\$22,074	Wire transfer from Santander Bank account #9222 to NFCU account #9698 in the name of RAQ Golden Services, LLC

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Sender</u>	<u>Amount</u>	<u>Description</u>
12	GOLDEN	3/9/2018	P.T.	\$19,775	Wire transfer from Santander Bank account #9222 to BB&T account # 8347 in the name of Dominique GOLDEN
13	GOLDEN	5/31/2018	B.P.	\$35,000	Wire transfer from Centennial Bank account # 6267 to Wells Fargo account # 1370 in the name of EMGREC Enterprises, LLC
14	MILLS	6/1/2018	L.F.	\$3,210	Wire transfer from BB&T account # 1121 to JP Morgan account # 0932 in the name of Sadae Mills
15	MILLS	6/7/2018	L.F.	\$1,500	Wire transfer from BB&T account # 1121 to JP Morgan account # 0932 in the name of Sadae Mills
16	GOLDEN	11/15/2018	B.P	\$45,000	Wire transfer from Centennial Bank to BoA account # 1091 in the name of Optimized Moore & More Solutions Inc.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

Upon conviction of one or more of the conspiracy to commit mail fraud, and mail and wire fraud offenses alleged in Counts 1 through 16 of this Indictment, defendants GOLDEN and MILLS shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. §§ 1341, 1343, and 1349, and a sum of money equal to the total amount of

proceeds obtained as a result of the offenses, including but not limited to, the following:

- A 2018 Bentley Bentayga, VIN# SJAAC2ZV1JC019776, color white, registered in the name of Dominique Golden, Georgia plate number RSA2433 (the "Bentley");
- A 2017 Mercedes E-Class, VIN Number WDDZF4JB0HA085124 registered in the name of Dominique Golden, with temporary Texas plate number 47888N3 (the "Mercedes");
- \$11,731 total cash that was seized from GOLDEN's residence in Houston, Texas (\$11,150) and the Bentley (\$581) that was located at GOLDEN's residence in Houston, Texas on September 11, 2019;
- 13 blank pre-paid Western Union money orders totaling \$6,000 that were seized from the Bentley, at GOLDEN's residence in Houston, Texas on September 11, 2019

The following items that were seized from GOLDEN's residence in Houston, Texas on September 11, 2019:

- o A gold oyster perpetual women's Rolex watch;
- o A gold oyster perpetual men's Rolex watch;
- o A gold and diamond Rolex bezel;
- o A 24" gold rope chain;
- o A 16" gold rope chain with diamond coin pendant;
- o A Glock 43 handgun (Serial #BHPL895);
- o A Remington Arms R51 handgun (Serial #0024524R51); and
- o A Chartered Arms .38 Special handgun (16-32223).

If any of the above-described forfeitable property, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence, has been transferred, sold to, or deposited with a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C.

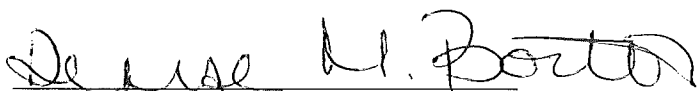
§ 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

All in accordance with 18 U.S.C. § 981(a)(1), as incorporated by 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

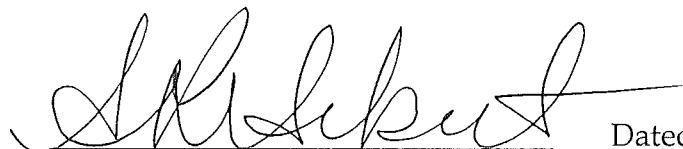
A TRUE BILL:

REDACTED

AARON L. WEISMAN
United States Attorney



DENISE MARIE BARTON
Assistant U.S. Attorney



SANDRA HEBERT
Assistant U.S. Attorney
Deputy Chief, Criminal Division

Dated:

October 3, 2019

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 Office

Name and Office of Person
Furnishing Information on
THIS FORM AARON WEISMAN
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000

Name of Asst.
U.S. Attorney Denise M. Barton
(if assigned)

PROCEEDING

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

United States Postal Inspection 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 under

SHOW
DOCKET NO.

MAG. JUDGE
CASE NO.

19-MJ-00073

Place of
offense RHODE ISLAND

County

USA vs.

Defendant: Dominique Golden a/k/a Raquel Golden a/k/a

Address

Birth
Date

Social Security Nu

REDACTED

REDACTED

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date 9/13/2019 or Date Transferred to Federal Custody

☐ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☒ Currently on bond

☐ Fugitive

Defense Counsel (if any): John L. Calcagni, III, Esq.

☐ 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 16

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	See Attached Sheet.	See Attached Sheet.	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Trial: 14 days	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

United States v.
Dominique Golden (a/k/a Raquel Golden, Emily Greco, and Mellisa Moore)
and
Sadie Mills)

INDICTMENT COVER SHEET ATTACHMENT

Count 1: (Conspiracy to Commit Mail Fraud, 18 U.S.C. §§ 1349, 1341)

MAX PENALTY

- a. 20 years imprisonment;
- b. \$250,000 fine or twice the gross gain or loss;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Count 2-10: (Mail Fraud, 18 U.S.C. § 1341)

MAX PENALTY FOR EACH COUNT

- a. 20 years imprisonment;
- b. \$250,000 fine or twice the gross gain or loss;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Count 11-16: (Wire Fraud, 18 U.S.C. § 1343)

MAX PENALTY FOR EACH COUNT

- a. 20 years imprisonment;
- b. \$250,000 fine or twice the gross gain or loss;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Forfeiture Allegation

Dominique GOLDEN: Charged in Counts 1, 2, 4-13, 16 Forfeiture

Sadae MILLS: Charged in Counts 1, 3, 14-15, Forfeiture

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

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO.

USA

19 115 JJM

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 Office

Name and Office of Person
Furnishing Information on
THIS FORM ☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000

Name of Asst.
U.S. Attorney Denise M. Barton
(if assigned)

Defendant: Sadae Mills

Address:

REDACTED

Birth
Date

en
(cable)

Social Security Number

PROCEEDING

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

United States Postal Inspection 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 under

SHOW
DOCKET NO.

MAG. JUDGE
CASE NO.

19-MJ-00072

Place of
offense RHODE ISLAND

County

DEFENDANT

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date 9/13/2019 or Date Transferred to Federal Custody

☐ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☒ Currently on bond

☐ Fugitive

Defense Counsel (if any): Robert B. Mann

☐ 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

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			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Trial: 14 days	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

United States v.
Dominique Golden (a/k/a Raquel Golden, Emily Greco, and Mellisa Moore)
and
Sadie Mills)

INDICTMENT COVER SHEET ATTACHMENT

Count 1: (Conspiracy to Commit Mail Fraud, 18 U.S.C. §§ 1349, 1341)

MAX PENALTY

- a. 20 years imprisonment;
- b. \$250,000 fine or twice the gross gain or loss;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Count 2-10: (Mail Fraud, 18 U.S.C. § 1341)

MAX PENALTY FOR EACH COUNT

- a. 20 years imprisonment;
- b. \$250,000 fine or twice the gross gain or loss;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Count 11-16: (Wire Fraud, 18 U.S.C. § 1343)

MAX PENALTY FOR EACH COUNT

- a. 20 years imprisonment;
- b. \$250,000 fine or twice the gross gain or loss;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Forfeiture Allegation

Dominique GOLDEN: Charged in Counts 1, 2, 4-13, 16 Forfeiture

Sadae MILLS: Charged in Counts 1, 3, 14-15, Forfeiture