

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Rhode Island

United States of America

v.

SHAWN WHITFIELD, D.O.B. 1970

Defendant(s)

Case No. 1:18-MJ-48PAS

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(s) of April 2015-January 2018 in the county of Providence in the
District of Rhode Island, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1341	Mail Fraud
18 U.S.C. § 1343	Wire Fraud
18 U.S.C. § 1956(a)(2)	International Money Laundering
18 U.S.C. § 371	Conspiracy
18 U.S.C. § 2326	SCAMS Act

This criminal complaint is based on these facts:

The Affidavit of Postal Inspector Corey P. McManus, attached hereto.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: Feb 15, 2018City and state: Providence, Rhode Island

Complainant's signature

Corey P. McManus, Postal Inspector

Printed name and title

Judge's signature

Patricia A. Sullivan, U.S. Magistrate Judge

Printed name and title

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

BY: ☐ INFORMATION ☐ INDICTMENT ☒ COMPLAINTMatter 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 STEPHEN G. DAMBRUCH
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000Name 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 underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.Place of
offense RHODE ISLAND County

CASE NO. _____

USA vs.

Defendant: Shawn WhitfieldAddress: Pawtucket, RI☐ Interpreter Required Dialect: _____Birth
Date 9/9/1970☒ Male ☐ Alien
☐ Female (if applicable)

Social Security Number _____

DEFENDANT

Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date _____ 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 5

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 type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Trial: 5 Days	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

United States v. Shawn Whitfield
COMPLAINT COVER SHEET ATTACHMENT

Count I: Mail Fraud, 18 U.S.C. § 1341

MAX PENALTY

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

Pursuant to SCAMS Act, 18 U.S.C. § 2326(2), a term of up to 10 years imprisonment in addition to any term of imprisonment imposed for Mail Fraud

Count II: Wire Fraud, 18 U.S.C. § 1343

MAX PENALTY

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

Pursuant to SCAMS Act, 18 U.S.C. §§ 2326(2), a term of up to 10 years imprisonment in addition to any term of imprisonment imposed for Wire Fraud

Count III: International Money Laundering, 18 U.S.C. § 1956(a)(2)

MAX PENALTY

- a. 20 years imprisonment;
- b. \$500,000 fine or twice gross gain/loss;
- c. 3 years to life supervised release; and
- d. \$100 special assessment.

Count IV: Conspiracy, 18 U.S.C. § 371

MAX PENALTY

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

Pursuant to SCAMS Act, 18 U.S.C. §§ 2326(2), a term of up to 10 years imprisonment in addition to any term of imprisonment imposed for Conspiracy

AFFIDAVIT OF CORY P. MCMANUS

IN SUPPORT OF APPLICATION FOR SEARCH WARRANT AND COMPLAINT AND ARREST WARRANT

I. INTRODUCTION

1. I make this affidavit in support of an application for a criminal complaint charging SHAWN WHITFIELD (D.O.B. [REDACTED]-1970) with Mail Fraud in violation of 18 U.S.C. § 1341, Wire Fraud in violation of 18 U.S.C. § 1343, International Money Laundering in violation of 18 U.S.C. § 1956(a)(2), Conspiracy in violation of 18 U.S.C. § 371, and section 18 U.S.C. § 2326 of the Senior Citizens Against Marketing Scams Act of 1994 ("SCAMS Act").
2. I also make this affidavit under Rule 41 of the Federal Rules of Criminal Procedure in support of an application for a search warrant for the search of the premises that is referred to as [REDACTED], Pawtucket, RI and [REDACTED], Pawtucket, RI (hereinafter, the "SUBJECT PREMISES"), and any safes, lockers and closed containers therein and any outbuildings associated with [REDACTED], Pawtucket, RI, as more particularly described in Attachment A (attached hereto and incorporated herein by reference), including any person present at the time the search warrant is executed, for the items described in Attachment B.
3. As set forth below, there is probable cause to believe that located within the SUBJECT PREMISES contain evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1341, 1343, 1956, and 371, relating to Mail Fraud, Wire Fraud, International Money Laundering, and Conspiracy.
4. The statements contained in this Affidavit are based upon my training and experience and information obtained from other witnesses and other law enforcement agents involved in this investigation. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part.

II. AFFIANT BACKGROUND

5. I have been a law enforcement officer for over 14 years and have been a United States Postal Inspector since July 2017. I am currently assigned to the Providence, Rhode Island field office of the United States Postal Inspection Service and I am responsible for the investigation of various crimes relating to the United States Mail including, but not limited to mail fraud, bank fraud, identity theft, and mail theft. Prior to my appointment as a Postal Inspector, I was a Special Agent with the United States Secret Service for approximately 13 years. I have received training in conducting investigations of crimes that adversely affect, or fraudulently use, the United States Mail and the United States Postal Service (USPS). I have participated in criminal investigations of various violations of Title 18 of the United States Code involving financial crimes, including mail, bank, and wire fraud, identity theft, money laundering, and computer crimes. In the course of my employment I have received training and have been involved in the use of investigative techniques such as interviewing victims, informants, and witnesses, conducting physical surveillance, and analyzing financial records. I have participated in several search warrants.

III. RELEVANT STATUTES

6. This investigation concerns alleged violations of Mail Fraud, Wire Fraud, International Money Laundering, Conspiracy, and the Senior Citizens Against Marketing Scams Act of 1994 ("SCAMS Act"), specifically:
- a. Title 18 U.S.C. § 1341 prohibits a person from devising or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, and for the purpose of executing such scheme or artifice or attempting so to do, places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or

commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed.

- b. Title 18 U.S.C. § 1343 prohibits a person from devising or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, and for the purpose of executing such scheme or artifice or attempting so to do, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice.
- c. Title 18 U.S.C. § 1956(a)(2) prohibits a person from transporting, transmitting, or transferring, or attempting to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of specified unlawful activity or knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.
- d. Title 18 U.S.C. § 371 prohibits two or more persons from conspiring either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy.

e. Title 18 U.S.C. § 2326 of the SCAMS Act provides that a person who is convicted of an offense under section 1341 or 1343, as well as other, or a conspiracy to commit such an offense, in connection with the conduct of telemarketing or email marketing shall be imprisoned for a term of up to 5 years in addition to any term of imprisonment imposed under any of those sections, respectively; and in the case of an offense under any of those sections that victimized ten or more persons over the age of 55; or targeted persons over the age of 55, shall be imprisoned for a term of up to 10 years in addition to any term of imprisonment imposed under any of those sections, respectively.

IV. BACKGROUND OF INVESTIGATION

7. A prevalent scam originating out of Jamaica and targeting United States residents is a lottery scam, where scammers lead victims to believe they have won a lottery, but the cash or prizes will not be released without upfront payment of taxes or fees. Scammers frequently target the elderly, under-educated or those with disposable incomes. In a so-called Jamaican lottery scam, an individual in the United States receives an unsolicited telephone call from an individual in Jamaica claiming to work for a well-known organization, such as Publishers Clearinghouse. The scammer notifies them that they have won large cash prizes, vacation getaways, vehicles, or other prizes. However, in order to collect their winnings, the individual is instructed to send money to pay for processing fees or taxes on their winnings. The scammer typically assures people that they will receive their prize shortly after the lottery has received their payment. Following these instructions, victims immediately mail or wire the money, but never receive their purported winnings.

8. Through the use of various sources, this investigation identified 47 individuals who sent a total of approximately \$98,100.00 to WHITFIELD from approximately April 2015 through January 2018 via Money Gram or Western Union accounts, or via US mail to the SUBJECT PREMISES. At least 10 of the identified victims were over the age of 55. Of those individuals who were interviewed, all were called via telephone and told they had won and were entitled to claim a large amount of money in

a lottery and were instructed to send money to WHITFIELD in advance of receiving their purported winnings. The individuals were told the money they were directed to send was for the payment of taxes or processing fees on their winnings.

9. On December 2, 2016, Jeanne M [REDACTED] filed a complaint with the US Postal Inspection Service on behalf of her mother, Lola K [REDACTED], [REDACTED], Myerstown PA 17067. According to the complaint, Ms. K [REDACTED] was contacted by an individual named Kirk Wright who informed her she had won \$3 million. However, Ms. K [REDACTED] was informed she had to pay the taxes before claiming her winnings by sending money to WHITFIELD and various other individuals.
10. As a result, Ms. K [REDACTED] mailed a total of \$1,700.00 to various individuals throughout the United States. Of the \$1700.00 she sent, \$850.00 was sent to WHITFIELD via two USPS money orders, serial #23132540992 for \$100.00 and serial #1967850240 for \$750.00. Both money orders were made payable and mailed to SHAWN WHITFIELD at [REDACTED], Pawtucket RI 02860. Money order #23132540992 was negotiated at the Attleboro, MA post office on 11/14/2016 and #1967850240 was negotiated at the Pawtucket, RI post office on 12/3/2016.
11. On February 10, 2017, Inspector Emily Fuccillo interviewed Cynthia C [REDACTED], [REDACTED], Copperas Cove, TX 76522. Ms. C [REDACTED] stated she had been contacted via telephone by an individual who identified himself as "Michael Washington" on February 8, 2017. Ms. C [REDACTED] stated "Washington" informed her she had won \$5.5 million in a lottery with Publishers Clearinghouse and told her she was required to pay a processing fee of \$390.00 before claiming her winnings.
12. Ms. C [REDACTED] stated "Washington" instructed her to mail the \$390.00 processing fee to SHAWN WHITFIELD, [REDACTED], Pawtucket RI 02860.¹ On February 9, 2017, Ms. C [REDACTED] mailed a personal check in the amount of

¹ Some victims sent money to WHITFIELD at [REDACTED], Pawtucket, RI, 02860 and others sent it to WHITFIELD at [REDACTED], Pawtucket, RI 02860. As described herein and in Attachment A, [REDACTED] is multi-unit dwelling with three units and [REDACTED], Pawtucket, RI, 02860 and [REDACTED], Pawtucket, RI 02860 are believed to refer to one location.

\$390.00 to SHAWN WHITFIELD, [REDACTED], Pawtucket RI 02860 via Priority Express Mail Parcel EL532990486US.

13. On February 10, 2017, Inspector Emily Fuccillo interviewed Nancy Y [REDACTED], [REDACTED], Spring Lake, MI 49456. Ms. Y [REDACTED] stated she had been contacted via telephone by an individual who identified himself as "Michael Anderson" on February 9, 2017. Ms. Y [REDACTED] stated "Michael Anderson" also used the name "Michael Washington". Ms. Y [REDACTED] stated "Michael" informed her she had won a prize with Publishers Clearinghouse and told her she was required to pay a processing fee of \$299.00 to cover the Michigan state taxes before claiming her winnings. Ms. Y [REDACTED] stated "Michael" initially instructed her to purchase a money order and mail it to SHAWN WHITFIELD, [REDACTED], Pawtucket RI 02860. However, Ms. Y [REDACTED] indicated she decided to mail a personal check for \$299.00 instead. On February 9, 2017, Ms. Y [REDACTED] mailed a personal check in the amount of \$299.00 to SHAWN WHITFIELD, [REDACTED], Pawtucket RI 02860 via Priority Express Mail Parcel EL353037456US.

14. According to postal records, Priority Mail Express package #EL844761736US weighing 0.38 lbs. was mailed on August 29, 2017, from Clinton, MO, addressed to SHAWN WHITFIELD, [REDACTED], Pawtucket, RI 02860. USPS delivery records indicate that Priority Mail Express package #EL844761736US was delivered to [REDACTED], Pawtucket, RI 02860 on August 30, 2017 at 12:19 PM. This record shows Priority Mail Express package #EL844761736US was signed for by WHITFIELD.

15. On December 6, 2017, I interviewed Charles M [REDACTED] who stated he had received a telephone call from an individual who identified himself as "Mr. Brown". Mr. M [REDACTED] stated "Mr. Brown" informed him he had won a prize with Publishers Clearinghouse and told him he was required to pay a processing fee before claiming his winnings. Mr. M [REDACTED] recalled sending money to various individuals throughout the United States and specifically recalled sending money to WHITFIELD. According to records provided by MoneyGram, Mr. M [REDACTED] sent \$1,500.00 to WHITFIELD, at [REDACTED], Pawtucket, RI, on April 1, 2016.

16. On December 6, 2017, I interviewed George B [REDACTED] who stated he had received a telephone call from an individual who identified himself as

"John Green" who informed Mr. B [REDACTED] that he had won the lottery and would receive \$500 a week for the rest of his life and a new Mercedes Benz automobile. In order to claim his winnings, Mr. B [REDACTED] was instructed to send money to various people around the country and recalled sending money on several occasions to WHITFIELD at [REDACTED], Pawtucket, RI. According to records I received, Mr. B [REDACTED] sent \$7,862.00 to WHITFIELD via MoneyGram between 1/15/16 and 3/12/16, and an additional \$750.00 to WHITFIELD via Western Union on 1/22/16. On February 1, 2018, I spoke again with Mr. B [REDACTED]. During that call, he advised that he was also instructed by "Mr. Collins" to retrieve money from Western Union and forward it to various other individuals.²

17. On December 7, 2017, I interviewed Emanuel F [REDACTED] who stated he had received a telephone call from an individual who identified himself as "Michael Washington". Mr. F [REDACTED] stated "Washington" informed him he had won \$82 million, but in order to claim his winnings, F [REDACTED] would have to pay a processing fee by sending money to WHITFIELD. F [REDACTED] remembered sending money to WHITFIELD. According to records I received, F [REDACTED] sent \$475.00 to WHITFIELD via MoneyGram on 2/29/16 and 3/1/16, and \$3,701.00 to WHITFIELD via Western Union between 3/1/16 and 3/4/16.

18. On December 7, 2017, I interviewed Tracy W [REDACTED] who stated he had received a telephone call from an individual who identified himself as "Michael Collins" who informed him he had won \$1.2 million dollars along with \$5,000.00 a week for the rest of his life, but in order to claim his winnings, W [REDACTED] would have to pay the taxes on the winnings. Mr. W [REDACTED] stated "Collins" instructed him to send money to WHITFIELD. According to records received, Mr. W [REDACTED] sent \$212.00 to WHITFIELD via Western Union and \$250.00 to WHITFIELD via MoneyGram on 2/29/16.

19. From the investigation to date, WHITFIELD does not appear to have any ties to Jamaica aside from this lottery scam. WHITFIELD was born in Boston, MA and there is no record of him ever traveling to Jamaica.

²I have not yet inquired of the other victims with whom I have been in contact if they were also asked to send money.

V. MAILINGS

20. According to USPS records, between 1/30/2016 and 1/18/2018 there were 61 First Class and Priority Mail Express envelopes addressed to WHITFIELD at [REDACTED], Pawtucket, RI, 12 or the SUBJECT PREMISES of which originated from cities where individuals identified in the investigation are known to have sent money to WHITFIELD.

21. The investigation has also revealed that on multiple occasions one or more of the packages listed above were tracked on line by an individual or individuals from outside the United States, specifically Jamaica. Based on my training and experience, I know that individuals involved in lottery and other similar scams often track a package's progression until delivered to its intended destination.

VI. BANK ACCOUNT INFORMATION

22. Santander Bank Account # [REDACTED] 0020 was opened by SHAWN WHITFIELD on 09/12/2016 in the name Shawn WHITFIELD dba Shawn WHITFIELD Making Your Move at [REDACTED], [REDACTED], Pawtucket, RI. According to account opening documents, Shawn WHITFIELD Making Your Move is listed as a sole proprietorship. WHITFIELD's occupation is listed as a self-employed landscaper.

23. A review covering the period September 2016 thru April 2017 was conducted of accounts opened and maintained by SHAWN WHITFIELD at Santander Bank. Among the documents reviewed were opening documents, bank statements, canceled checks, deposit tickets, and items deposited.

24. The review of activity on the account revealed credits to the account totaled \$18,842.38 which included \$18,110.58 in deposited personal checks, cashier's checks, and money orders made payable to WHITFIELD. The review also revealed 12 deposited checks made payable to SHAWN A WHITFIELD totaling \$7,206.25 drawn on an account maintained in the name PPI Time Zero Inc., 11 Madison Rd, Fairfield NJ 07004. According to the firm's website, PPI Time Zero Inc. is an electronic manufacturing services

provider. The company's closest facility is located in Norwood, MA.

VII. MONEYGRAM AND WESTERN UNION

25. MoneyGram International Inc. (MoneyGram) offers consumer-to-consumer money transfer services. Consumers in the United States can send funds electronically from MoneyGram agent locations and receivers can pick up available funds at MoneyGram agent locations. MoneyGram has agent locations in the United States, Jamaica, and elsewhere.

26. The Western Union Company (Western Union) offers consumer-to-consumer money transfer services. Consumers in the United States can send funds electronically from Western Union agent locations, by phone and online, and receivers can pick up available funds at Western Union agent locations. Western Union has agent locations in the United States, Jamaica, and elsewhere.

27. In order to send money via Western Union or MoneyGram, an individual must go to an agent location, complete the necessary form, give the Agent the completed form with the applicable funds (including transaction fee), save the receipt and transaction tracking number and share the provided tracking number with the receiver which enables the receiver to pick up the funds.

28. A review was conducted of financial records and data provided by MoneyGram and Western Union in response to Grand Jury subpoenas requesting any and all money order purchases and/or wire transfer transactional data for SHAWN WHITFIELD, DOB: [REDACTED] 1970, SSN: [REDACTED] 6150.

29. Between July 2015 and October 2016, WHITFIELD received 48 MoneyGram money transfers totaling \$20,616.00 in amounts ranging between \$50.00 and \$2,000.00 from 21 individuals in the United States (US). The funds were obtained at various MoneyGram pay locations in Rhode Island.

30. Between May 2015 and May 2017, WHITFIELD conducted 62 MoneyGram money transfers and sent funds to 20 individuals in Jamaica totaling

\$27,891.00 in amounts ranging between \$25.00 and \$900.00. The transfers were conducted at various MoneyGram pay locations in Rhode Island.

31. Between April 2012 and October 2016, WHITFIELD received 33 Western Union money transfers totaling \$12,156.00 in amounts ranging between \$40.00 and \$1,200.00 from 20 individuals in the US. The funds were obtained at several Western Union pay locations in Rhode Island.
32. Between July 2015 and December 2016, WHITFIELD conducted 63 MoneyGram money transfers and sent funds to 20 individuals in Jamaica totaling \$21,750.04 in amounts ranging between \$10.00 and \$1,440.00. The transfers were conducted at various Western Union pay locations in Rhode Island.
33. WHITFIELD received his MoneyGram & Western Union money transfers by utilizing 14 different pay locations in Central Falls (RI), Pawtucket (RI), Rumford (RI), Cumberland (RI), North Providence (RI) and Providence (RI). In addition, WHITFIELD utilized 11 different pay locations in Central Falls (RI), Pawtucket (RI) and Rumford (RI), to transfer funds to individuals in Jamaica via MoneyGram & Western Union. Based on my training and experience, I believe that WHITFIELD's use of multiple locations to send and receive funds was an effort to limit his ability to be recognized at any one money remitter location and conceal his involvement in the fraud scheme.
34. Rhode Island driver's license # [REDACTED] 0723 was listed as the form of identification used in receiving the aforementioned money transfers. RI Driver's License # [REDACTED] 0723 was issued to SHAWN WHITFIELD, Male, at [REDACTED], [REDACTED], Pawtucket, RI; DOB [REDACTED] 1970, SSN [REDACTED] 6150.

VIII. TELEPHONE RECORDS

35. A review was conducted of telephone records provided by T-Mobile pursuant to a Grand Jury subpoena requesting account information for cell phone number [REDACTED] 1818. This telephone number was identified through bank account records as well as data provided by Western Union and MoneyGram. The T-Mobile records provided the following information

for cell phone number [REDACTED] 1818: Subscriber Name: Shawn WHITFIELD;
Subscriber Address: [REDACTED], Pawtucket RI 02860-2111; Subscriber
Name Effective Date: 01/25/2016.

36. A review of incoming and outgoing telephone calls for cell phone number [REDACTED] 1818 revealed that between 01/25/2016 and 05/04/2017 there were 2,167 successfully completed incoming telephone calls from multiple telephone numbers in Jamaica and 415 successfully completed outgoing telephone calls to multiple telephone numbers in Jamaica.

IX. RECENT ACTIIVTY INVOLVING SHAWN WHITFIELD AND THE SUBJECT PREMISES

37. On January 18, 2018 I was informed Priority Express Mail Parcel EL456813528US addressed to SHAWN WHITFIELD, [REDACTED], Pawtucket RI 02860 from Debbie H [REDACTED], [REDACTED] St. Petersburg, FL 33705 was scheduled for delivery. On January 19, 2018 I interviewed Ms. H [REDACTED] who stated she had been contacted via telephone by an individual who identified himself as "Michael" who informed her she had won \$8 million with Publishers Clearinghouse. Ms. H [REDACTED] stated she received a second call from the same individual using a different name.
38. "Michael" told Ms. H [REDACTED] she was required to pay a processing fee of \$1,530.00 before claiming her winnings, and instructed her to mail the fee to SHAWN WHITFIELD, [REDACTED], Pawtucket RI 02860. On January 17, 2017, Ms. H [REDACTED] mailed USPS money order #2461141273 in the amount of \$280.00 to Shawn WHITFIELD, [REDACTED], Pawtucket RI 02860 via Priority Express Mail Parcel EL456813528US.
39. On January 18, Ms. H [REDACTED] mailed a second Priority Express Mail Parcel (EL456821966US) to SHAWN WHITFIELD, [REDACTED], Pawtucket RI 02860, which contained two USPS money orders, #2461141277 in the amount of \$1,000.00 and #2461141278 in the amount of \$250.00.
40. On January 18, I intercepted Priority Express Mail Parcel EL456813528US after it arrived at the Pawtucket Post Office. The parcel was brought back to my office and secured as evidence. Multiple attempts to reach the victim were unsuccessful.

41. On January 19, I intercepted a second Priority Mail Parcel EL456821966US at the Pawtucket Post Office. This package had the same characteristics as the parcel that was intercepted on January 18, to include the same sender, recipient, weight and postage. The parcel was brought back to my office and secured as evidence. Later that same day, I made contact via telephone with the victim, Ms. H [REDACTED]. Ms. H [REDACTED] confirmed that she was a victim of a lottery scam and gave me consent to open both suspect parcels. Inside parcel EL456813528US, I discovered one USPS money order #2461141273 in the amount of \$280.00 to Shawn WHITFIELD, [REDACTED], Pawtucket RI 02860. Inside parcel EL456821966US, I discovered two USPS money orders, #2461141277 in the amount of \$1,000.00 and #2461141278 in the amount of \$250.00 made out to Shawn WHITFIELD, [REDACTED], Pawtucket RI 02860. All three money orders were photocopied and returned back to the victim.

X. UNDERCOVER TELEPHONE CALLS

42. On January 27, 2018, I conducted a consensual undercover telephone call to WHITFIELD at telephone number [REDACTED] 1818, posing as the husband of Debbie H [REDACTED], with whom I had spoken on January 19, 2018. The call lasted approximately 8 minutes. When I explained to WHITFIELD the purpose of the telephone call was to verify his address and to discuss money that "my wife" had attempted to send him at the direction of "Michael," WHITFIELD initially stated "you have the wrong Shawn". Throughout the call, WHITFIELD indicated that he did not know why money was being sent to him. While explaining how I was contacted and the instructions I was provided, WHITFIELD indicated he too was a victim of the scam, and stated "I didn't get any money." From my investigation, I know this statement by WHITFIELD was false. As described above, the investigation determined WHITFIELD received approximately \$98,100.00 from individuals throughout the US. WHITFIELD indicated "they (the individuals with whom WHITFIELD dealt) don't call me". The investigation also determined, however, between 1/25/2016 and 5/04/2017 there were 2,167 successfully completed incoming telephone calls to WHITFIELD from multiple telephone numbers in Jamaica, and 415 successfully completed outgoing telephone calls from WHITFIELD to multiple telephone numbers in Jamaica.

43. I conducted a second consensual undercover telephone call to WHITFIELD on the same day in response to an unanswered telephone call I had received from him following the first call. I told WHITFIELD I had received several checks to which WHITFIELD questioned why he wasn't getting any. In the first call, WHITFIELD stated that the whole thing was a scam but, when I described receiving money, he said that he wanted to know why he wasn't receiving money too. He again stated "I never received anything". The investigation determined, however, that WHITFIELD received 14 checks totaling \$63,328.00 from various victims throughout the US, as well as money transfers.
44. I explained to WHITFIELD that an individual who identified himself as "Michael" instructed me to send a processing fee to WHITFIELD in order to claim my winnings. WHITFIELD stated he had no idea what he was supposed to do with the money. WHITFIELD, after claiming he was a victim to this scheme as well, indicated that he was instructed to send two payments, in the amount of \$500.00 and \$250.00, in order to claim his reported winnings. As set forth above, the investigation determined WHITFIELD received approximately \$98,100.00 from individuals all over the US and sent approximately \$76,800.00 to individuals in Jamaica.
45. WHITFIELD stated he was provided with only two telephone numbers belonging to individuals in Jamaica and asked me for the number that I was contacted from, so that he could contact them and try to recoup the money he lost. The investigation determined WHITFIELD successfully placed 415 telephone calls to individuals in Jamaica using eight different telephone numbers.
46. I believe that WHITFIELD was either concerned that I was law enforcement or that a victim had identified him as part of a fraud, and made the false statements described in an attempt to exculpate himself. During both undercover phone calls, WHITFIELD's tone appeared to be suspicious, often slow to respond to my questions and very brief on the answers he was providing. It appears the second call was an attempt by WHITFIELD to reiterate that he was victim as well and distance his role as an active participant.

XI. PROBABLE CAUSE TO BELIEVE THAT EVIDENCE WILL BE FOUND AT THE SUBJECT PREMISES

47. The building at [REDACTED], Pawtucket, RI is a multi-unit building. According to a postal carrier for that route, [REDACTED] [REDACTED] are in the same building. [REDACTED] is believed to be 1 unit and [REDACTED] is believed to have 2 units. According to the postal carrier, the names associated with [REDACTED] are Shawn Whitfield and Wilma Smith. Our investigation has determined that Wilma Smith is or was in a relationship with WHITFIELD, and phone records show approximately 11 telephone calls in July 2015 from Smith's cell phone to Jamaica. According to property records for the City of Pawtucket, [REDACTED] is a single family home with 3,072 square feet and [REDACTED] does not exist in the City's property records. Based on my observations of the size of the building, I believe that the owner of [REDACTED] sub-divided the home into three units, with one unit in [REDACTED] and 2 units in [REDACTED]. As set forth above, from this investigation, I know that packages that were addressed to WHITFIELD at [REDACTED], Pawtucket, RI, without reference to [REDACTED], and [REDACTED], [REDACTED], Pawtucket, RI, and I believe that the two addresses refer to one premises.

48. Whitfield's RI license and his bank account list [REDACTED] [REDACTED], Pawtucket, RI as his residence.

49. There is probable cause to believe that the SUBJECT PREMISES contains evidence, fruits, and instrumentalities of WHITFIELD's and his co-conspirators fraudulent lottery scheme. Due to the nature of this fraud; the fact that participants are both in Rhode Island and Jamaica; the knowledge that the fraud is perpetrated, at least in part, by telephone communications between co-conspirators; and my training and experience, I believe it is likely that telephones and computers have been used to perpetrate and store evidence of the fraud.

50. I know based on my training and experience, that individuals maintain in their homes, both in paper and electronic format, among other items, records regarding the receipt and expenditure of money,

documents relating to the purchase of assets, and records pertaining to their employment or business. Similarly, given the nature of the fraud, based on my training and experience, I believe that participants in a long running fraud that involves several participants, more often than not, will keep records containing names, addresses, email addresses, and telephone numbers of co-conspirators, as well as targets and victims, amounts received from them, and amounts sent to co-conspirators. These records are necessary to further the illicit fraud business and can be found in paper form or stored electronically in cell phones and other electronic devices. Owing to the long-term usefulness of such items, and tracking relative proceeds among co-conspirators, this type of evidence would likely be generated, maintained, and then possibly forgotten about and not disposed of.

51. There are many reasons why criminal offenders maintain evidence for long periods of time. First, to the offender, the evidence may seem innocuous at first glance (e.g. financial, credit card and banking documents, travel documents, receipts, documents reflecting purchases of assets, personal calendars, telephone and address directories, checkbooks, videotapes and photographs, utility records, ownership records, letters and notes, tax returns and financial records, escrow files, telephone and pager bills, keys to safe deposit boxes, packaging materials, computer hardware and software). To law enforcement, however, such items may have significance and relevance when considered in light of other evidence. Second, the criminal offender may no longer realize he/she still possesses the evidence or may believe law enforcement could not obtain a search warrant to seize the evidence. The criminal offender may also be under the mistaken belief that he/she has deleted, hidden or further destroyed computer-related evidence, which in fact, may be retrievable by a trained forensic computer expert. Thus, records and ledger-type evidence that one would think a prudent person might destroy because of its incriminatory nature are sometimes still possessed months or even years after the records were created.

52. From training and experience I know that individuals who amass proceeds from illegal activities routinely attempt to further that conduct and/or conceal the existence and source of their funds by

engaging in financial transactions with domestic and foreign institutions, and others, through all manner of financial instruments, including cash, cashier's checks, money drafts, traveler's checks, wire transfers, etc. Records of such instruments are oftentimes maintained at the individual's residence or some other place over which they maintain dominion and control.

53. As set forth above, from this investigation, I know that WHITFIELD has communicated with his suspected co-conspirators via telephone. From T-Mobile records, I have learned that WHITFIELD has used a smart phone, which is a computer capable of storing vast quantities of information. Based on my training and experience, I know that smart phones are regularly connected to, either wirelessly or physically, to and backed up to other computer devices. For that reason, I believe there is probable cause to believe that other computer devices in the SUBJECT PREMISES will contain evidence, fruits, and instrumentalities of WHITFIELD's and his co-conspirators fraudulent lottery scheme.

54. In addition, during the course of such residential searches, I and other agents have also found items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the SUBJECT PREMISES and computer devices located therein. Such identification evidence is typical of the articles people commonly maintain in their residences, such as canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys

XII. SPECIFICS OF SEARCH AND SEIZURE OF COMPUTER SYSTEMS

55. I have training in computer-related or computer-involved crimes and have also spoken with officers and agents who have had training and experience in the investigation of computer-related and computer-involved crimes. Based on my training, experience, knowledge, and communications with experienced officers and agents, I know the following:

56. Searches and seizures of evidence from computers commonly require agents to seize most of the computer items (hardware, software and instructions) to be processed later by a qualified computer expert in a laboratory or other controlled environment due to the volume of evidence, the type of evidence located, or the conditions of the search location, among other reasons. Accordingly, although law enforcement officers may conduct an on-site preview of certain computers, computer peripherals, and computer related materials, permission is sought to seize and search computers and computer-related devices and materials consistent with the scope of the requested searches and to search them at an off-site location. Further, the USPIS may use its own computer forensic analysts or may seek the assistance of an outside agency to search for, seize, preview, review, process, and examine any computers and computer related devices and materials during execution of the search warrants.

57. Computer storage devices (like cell phones, hard drives, diskettes, tapes, etc.) store the equivalent of thousands of pages of information. Especially when the user wants to conceal criminal evidence, he or she may store it in random order with deceptive file names. This requires searching authorities to examine all the stored data to determine whether it is included in the warrant. This examination process can take weeks or months, depending on the volume of the data stored, and it would be impractical to attempt this kind of data search on-site.

58. Searching computer systems for criminal evidence is a highly technical process requiring expert skills in a properly controlled environment. The vast array of computer hardware and software available today requires even computer experts to specialize in some systems and applications. It is difficult to know before a search which expert should analyze the system and its data. A search of a computer system is an exacting scientific procedure, which is designed to protect the integrity of the evidence and to recover hidden, erased, compressed, password-protected, and other encrypted files. Because computer evidence is extremely vulnerable to tampering and destruction (both from external sources and from code embedded in the system as a "booby-

trap"), the controlled environment of a laboratory is essential to its complete and accurate analysis.

59. In order to fully retrieve data from a computer system, the analyst may need all magnetic storage devices, as well as the central processing unit ("CPU"). In addition, the analyst may need all assisting software (operating systems or interfaces, and hardware drivers) and any applications software, which may have been used to create the data (whether stored on hard drives or on external media), as well as all related instructional manuals or other documentation and security devices. Moreover, searching computerized information for evidence or instrumentalities of crime commonly requires the seizure of the entire computer's input/output periphery devices (including related documentation, passwords and security devices) so that a qualified expert can accurately retrieve the system's data in a controlled environment. Peripheral devices, which allow users to enter and retrieve data from stored devices, vary widely in their compatibility with other hardware and software. Many system storage devices require particular input/output devices in order to read the data on the system. It is important that the analyst be able to properly retrieve the evidence sought.

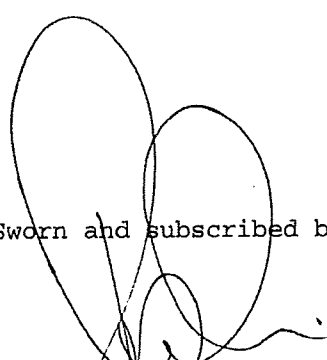
CONCLUSION

60. I therefore respectfully submit that there is probable cause for a criminal complaint to issue charging SHAWN WHITFIELD with Mail Fraud in violation of 18 U.S.C. § 1341, Wire Fraud in violation of 18 U.S.C. § 1343, International Money Laundering in violation of 18 U.S.C. § 1956(a)(2), and Conspiracy in violation of 18 U.S.C. § 371, and to believe that evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 1341, 1343, and 371 are located within the SUBJECT PREMISES described in Attachment A.



CORY P. MCMANUS

US Postal Inspector



Sworn and subscribed before me this 15th day of February, 2018.

HON. PATRICIA A. SULLIVAN

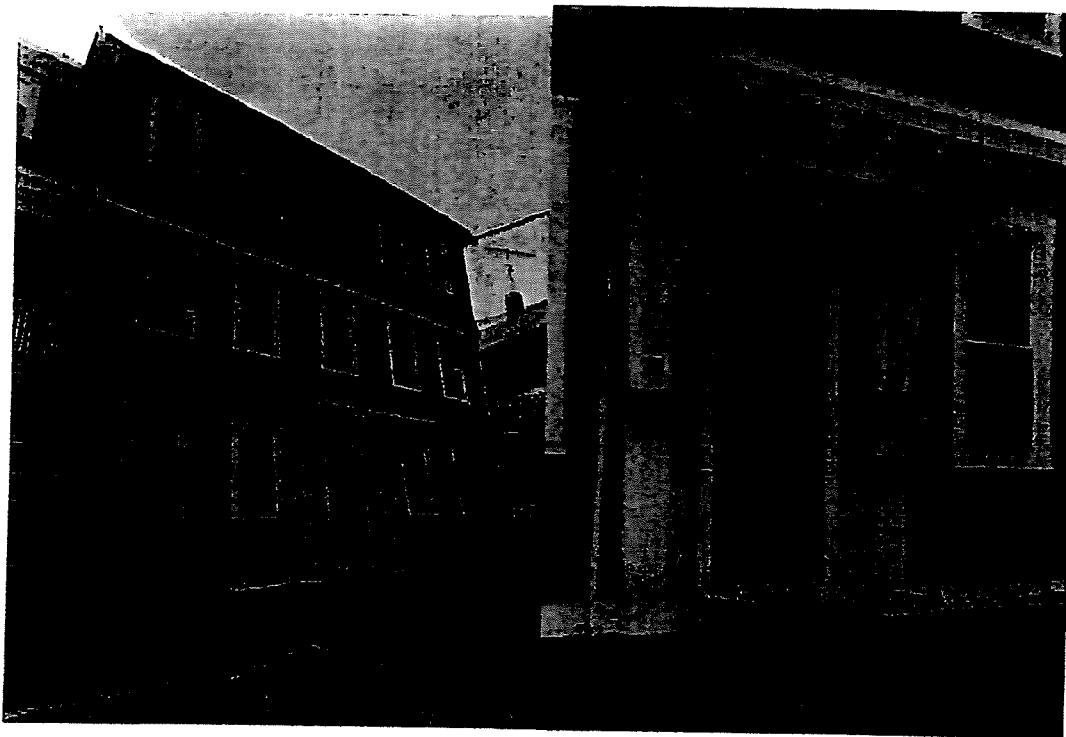
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property To Be Searched

The SUBJECT PREMISES to be searched is located at [REDACTED], Pawtucket, RI 02860-2111 and referred to both as [REDACTED], Pawtucket, RI and [REDACTED] Pawtucket, RI. The SUBJECT PREMISES are believed to be occupied by SHAWN WHITFIELD. From my observations, [REDACTED] is a three story, multi-unit residence with the number "[REDACTED]" located to the left side of the main entry and "[REDACTED]" on the right side of the main entry. There is one mailbox on the left side of the entry under the number [REDACTED] and two mailboxes under the number "[REDACTED]" on the right side of the entry. There are three water meters on the outside of the structure. [REDACTED] is believed to be comprised of 1 apartment unit and [REDACTED] has 2 apartment units. The search shall include any safes, lockers and closed containers therein, any outbuildings associated with [REDACTED], Pawtucket, RI, and shall include any person present at the time the search warrant is executed.

Photos of the SUBJECT PREMISES are included below:



ATTACHMENT B

Items To Be Seized

The following materials, which constitute evidence of the commission of a criminal offense, contraband, the fruits of crime, or property designed or intended for use or which is or has been used as a means of committing a criminal offense, namely violations of Mail Fraud in violation of 18 U.S.C. § 1341, Wire Fraud in violation of 18 U.S.C. § 1343, International Money Laundering in violation of 18 U.S.C. § 1956(a)(2), Conspiracy in violation of 18 U.S.C. § 371, and section 18 U.S.C. § 2326 of the Senior Citizens Against Marketing Scams Act of 1994 ("SCAMS Act"):

1. Records and other materials, including notes, ledgers, envelopes, and packaging materials, relating to receipt of cash, money orders, checks, or wire transfers sent to the SUBJECT PREMISES and/or Shawn Whitfield from individuals identified as victims in this investigation and more generally, in relation to any sweepstakes, contest, or lottery and/or the transfer and receipt of funds between WHITFIELD and other persons;
2. Any and all opened or sealed USPS Priority or other mail envelopes and packages, to include but not limited to such envelopes and packages from individuals identified as victims in this investigation and more generally, in relation to any sweepstakes, contest, or lottery and/or the transfer and receipt of funds between WHITFIELD and other persons;
3. All notes, documents, records, correspondence, diaries, and address books, in any format or medium (including, but not limited to, computer or digital data files, envelopes, letters, papers, handwritten notes, and electronic messages, chat logs and electronic records) relating to individuals identified as victims in this investigation and more generally, in relation to any sweepstakes, contest, or lottery and/or the transfer and receipt of funds between WHITFIELD and other persons;
4. Documents and articles of personal property reflecting the identity of persons occupying, possessing, residing in, owning, frequenting, or controlling the SUBJECT PREMISES, including keys, rental agreements and records, utility bills and receipts, photographs, answering machine tape recordings, telephone, vehicle records, canceled mail envelopes, correspondence, financial documents such as tax returns, bank records, safety deposit box records, canceled checks, and other records of income and expenditure, credit card records, travel documents, personal identification documents, including birth certificates, driver's license, immigration cards, and other forms of identification;

5. Records relating to the use, possession, and control of cellular telephones seized from the SUBJECT PREMISES or any person located therein, and any landline telephones associated with the SUBJECT PREMISES;
6. Records relating to any communications with co-conspirators, including telephone, electronic, or in person communications with co-conspirators in relation to any sweepstakes, contest, or lottery and/or the transfer and receipt of funds between WHITFIELD and other persons;
7. Any records which document an association with co-conspirators, including photographs, video and audio recordings;
8. Banking, money remitter, and financial institution records, including but not limited to bank statements, credit card statements, canceled checks, money orders, deposit slips, orders for receipt or sending of money transfer by wire, checking and savings books, financial institution statements, and records of safe deposit boxes;
9. For any computer or storage medium whose seizure is otherwise authorized by this warrant, and any computer or storage medium that contains or in which is stored records or information whose seizure is authorized by this warrant, including any cell phones (hereinafter, "COMPUTER"):
 - a. evidence of who used, owned, or controlled the COMPUTER at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved user names and passwords, documents, browsing history, user profiles, email, email contacts, "chat," instant messaging logs, photographs, and correspondence;
 - b. evidence of software that would allow others to control the COMPUTER, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;
 - c. evidence of the lack of such malicious software;
 - d. evidence indicating how and when the computer was accessed or used to determine the chronological context of computer access, use, and events relating to the crimes under investigation and to the computer user;
 - e. evidence indicating the computer user's knowledge and/or intent as it relates to the crimes under investigation;

- f. evidence of the attachment to the COMPUTER of other storage devices or similar containers for electronic evidence;
 - g. evidence of programs (and associated data) that are designed to eliminate data from the COMPUTER;
 - h. evidence of the times the COMPUTER was used;
 - i. passwords, encryption keys, and other access devices that may be necessary to access the COMPUTER;
 - j. documentation and manuals that may be necessary to access the COMPUTER or to conduct a forensic examination of the COMPUTER;
 - k. records of or information about Internet Protocol addresses used by the COMPUTER;
 - l. records of or information about the COMPUTER's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses; and
 - m. contextual information necessary to understand the evidence described in this attachment; and
10. With respect to any and all electronically stored information in cellular telephones, agents may access, record and seize the following:
- a. Telephone numbers of incoming/outgoing calls stored in the call registry;
 - b. Digital, cellular and/or telephone numbers and/or direct connect numbers, names and identities stored in the directories;
 - c. Any incoming/outgoing text messages relating to the above criminal violations;
 - d. Telephone subscriber information;
 - e. The telephone numbers stored in the cellular telephone and/or PDA;
 - f. Any other electronic information stored in the memory and/or accessed by the active electronic features of the digital or cellular telephone including but not limited to photographs, videos, e-mail, and voice mail relating to the above criminal violations.

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 STEPHEN G. DAMBRUCH
☒ U.S. Atty. ☐ Other U.S. Agency
Phone No. (401) 709-5000Name 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 underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.Place of
offense RHODE ISLAND County

USA vs.

Defendant: Shawn Whitfield

Address

Birth
Date

Social

REDACTED

Alien
plicable)Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date _____ 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 5

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 type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Trial: 5 Days	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

United States v. Shawn Whitfield
COMPLAINT COVER SHEET ATTACHMENT

Count I: Mail Fraud, 18 U.S.C. § 1341

MAX PENALTY

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

Pursuant to SCAMS Act, 18 U.S.C. § 2326(2), a term of up to 10 years imprisonment in addition to any term of imprisonment imposed for Mail Fraud

Count II: Wire Fraud, 18 U.S.C. § 1343

MAX PENALTY

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

Pursuant to SCAMS Act, 18 U.S.C. §§ 2326(2), a term of up to 10 years imprisonment in addition to any term of imprisonment imposed for Wire Fraud

Count III: International Money Laundering, 18 U.S.C. § 1956(a)(2)

MAX PENALTY

- a. 20 years imprisonment;
- b. \$500,000 fine or twice gross gain/loss;
- c. 3 years to life supervised release; and
- d. \$100 special assessment.

Count IV: Conspiracy, 18 U.S.C. § 371

MAX PENALTY

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

Pursuant to SCAMS Act, 18 U.S.C. §§ 2326(2), a term of up to 10 years imprisonment in addition to any term of imprisonment imposed for Conspiracy