

UNITED STATES DISTRICT COURT

for the

District of Rhode Island

United States of America )

v. )

CHRISTOPHER CARROLL )

DOB 1967 )

GRANDVILLE, MI )

Defendant

Case No.

1:14-MJ-294-PAS

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 06/17/13 to the present in the county of \_\_\_\_\_ in the \_\_\_\_\_ District of

Rhode Island, the defendant violated 18 U. S. C. § 228a2/c2, an offense described as follows:

and 18 U.S.C. §§ 228(a)(3) and (c)(2)

Travelling in Interstate and Foreign Commerce with the Intent to Evade a Support Obligation Greater than \$5,000 in violation of 18 U.S.C. §§ 228(a)(2) and (c)(2); and

Willful Failure To Pay a Child Support Obligation for A Child Who Resides in Another State in an Amount Greater than \$10,000 in violation of 18 U.S.C. §§ 228(a)(3) and (c)(2).

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Peter Cote, Department of Health and Human Services, Office of Inspector General, Office of Investigations.

Continued on the attached sheet.

Peter Cote

Complainant's signature

Peter Cote, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: Dec 22, 2014

Patricia A. Sullivan

Judge's signature

City and state: Providence, Rhode Island

Patricia A. Sullivan, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Peter Cote, having been duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Office of Inspector General, United States Department of Health and Human Services ("HHS") and have been so employed since April 2007. Prior to that time, I worked as a Special Agent for the United States Secret Service for four years. As part of my official duties, I am assigned to investigate persons who have failed to pay legal child support obligations.
2. The information set forth in this affidavit is based on my investigation and information provided to me by other employees of HHS, other law enforcement agencies, interviews with witnesses, and reviewing financial and other records. This affidavit does not contain all the information obtained in connection with this investigation.
3. I make this affidavit in support of a criminal complaint and arrest warrant for Christopher Carroll ("CARROLL") d.o.b. \*\*/\*\*/1967, SSN \*\*\*\_\*\*\_6795, charging him with Travelling in Interstate and Foreign Commerce with the Intent to Evade a Support Obligation Greater than \$5,000 in violation of 18 U.S.C. §§

228(a)(2) and (c)(2); and Willful Failure To Pay a Child Support Obligation for A Child Who Resides in Another State in an Amount Greater than \$10,000 in violation of 18 U.S.C. §§ 228(a)(3) and (c)(2).

4. On January 5, 2011, CARROLL and his former wife, (the "Custodial Parent"), were divorced by a Final Judgment of the Rhode Island Family Court in Civil Action #K-10-507 ("Final Judgment"). The Final Judgment, among other things, ordered that CARROLL pay \$6,000.00 per month in child support for his three minor children: B.C. (d.o.b. \*\*/\*\*/2001); O.C. (d.o.b. \*\*/\*\*/2004); and C.C. (d.o.b. \*\*/\*\*/2006). The child support portion of the Final Judgment was effective January 1, 2011. Both parents were awarded joint custody of the three children, with physical custody awarded to the Custodial Parent who resides in Rhode Island with the children.
5. At the time of the Final Judgment, CARROLL was employed as Vice President of Global Marketing with Schneider Electric located in West Kingston, RI. In approximately May 2012, CARROLL relocated from Rhode Island to Schneider Electric Headquarters in Paris, France and was earning approximately \$480,000, per year. On or about October 30, 2012, CARROLL's

employment with Schneider Electric ended while he was still working in Paris, France.

6. Subsequent investigation revealed that since that time, CARROLL has remarried and is travelling abroad. On social media sites, CARROLL and his current spouse identify themselves as a "semi-retired couple who has (sic) been travelling for the past year in Europe, Central and South America, Canada and the U.S."
7. According to the Custodial Parent, my review of her financial records, and the Rhode Island Child Support Enforcement Office, CARROLL made child support payments in accordance with the Final Judgment until December 1, 2012, when thereafter all payments ceased.
8. On June 17, 2013 in Rhode Island Family Court, CARROLL was adjudged in contempt for failing to pay child support in the amount of \$42,000 ("Contempt Order").
9. Based upon review of electronic database systems and other investigative techniques, as well as discussions with representatives of the United States State Department, it appears that CARROLL has renounced his U.S. Citizenship and is travelling abroad utilizing a Republic of Ireland passport which, on information and belief, he lawfully possesses.

10. CARROLL has had numerous investment accounts with various financial institutions, both in the United States and abroad, since the Final Judgment took effect. Financial records indicate that CARROLL withdrew the following sums from financial institutions during the pendency of his support obligations and that these withdrawals totaled \$396,329.31:

- From October 9, 2012 through October 15, 2012, CARROLL transferred \$14,500.00, from a TIAA-CREF Trust Company, FSB, account ending in #8916, to CARROLL's HSBC Bank USA, checking account ending in #99-2.
- On November 7, 2012, CARROLL terminated and withdrew the balance of \$200,956.54, from a VANGUARD - Schneider Electric 401(K) Plan ending in #510.
- On December 3, 2012, CARROLL terminated and withdrew the balance of \$7,872.77, from a VANGUARD - Schneider Electric Defined Contribution Restoration Plan ending in #818.
- From October 25, 2012 through November 19, 2012, CARROLL electronically wired \$153,000.00 from his HSBC Bank USA, checking account ending in #99-2, to financial institutions in Slovenia, France, and

Japan, according to CARROLL's HSBC records which I reviewed.

- On April 30, 2013, CARROLL wired \$20,000.00 to Barclays Bank PLC, located in London, England from BNP Paribas, which is an international financial institution.

11. Based on the information I have obtained from the Custodial Parent, as well as review of her financial records, CARROLL's last child support payment was made on November 2, 2012.
12. On September 17, 2013, CARROLL made an involuntary payment due to a garnishment of a Bank of America account in the amount of \$1,600.00. On October 11, 2013, Carroll made an involuntary payment through a tax refund garnishment for the tax year 2012 in the amount of \$2,448.11.
13. R.I.G.L. §§ 15-20-4 and 15-20-2, require obligor parents to notify the Rhode Island Department of Human Services when the obligor changes residence and employment. However, the Rhode Island Department of Human Services has no record of CARROLL providing notice of any change of address or employment. Instead, the documentary evidence shows that no corresponding notifications were made to the State of

Rhode Island or any attempt to comply with or meet the child support obligations during the charged time period.

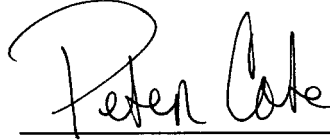
14. CARROLL has been made aware of his obligations through Court orders, documents forwarded by his former legal counsel, his history of payments, and by service of Court documents to a mail service called Mailbox Forwarding, Inc., located in Grandville, Michigan ("Mailbox Forwarding"). Among other services, Mailbox Forwarding accepts certified and other mail and scans all of a subscriber's mail into an internet account which the subscriber may access from anywhere in the world.
15. On information and belief and from reviewing Rhode Island Family Court records, from on or about December 12, 2012, CARROLL's Attorney of Record in his divorce proceedings lost communication with CARROLL. The attorney's voice mails and e-mails to her client were unanswered and the Attorney moved to withdraw from the case on April 24, 2013 ("Motion to Withdraw"). The Motion to Withdraw was granted as part of the Contempt Order on June 17, 2013. The Motion to Withdraw was sent to CARROLL and received by Certified Mail on

April 28, 2013. The Motion to Withdraw was signed for by a representative of Mailbox Forwarding.

16. The records of the Rhode Island Child Support Enforcement Office indicate that as of November 30, 2014, CARROLL is in arrears for child support owed as a result of the Final Order in the amount of \$156,723.05.
17. Based upon the preceding information, I believe that probable cause exists to support a Criminal Complaint and Arrest Warrant charging CHRISTOPHER CARROLL, from on or about January 17, 2013 to the present, with Travelling in Interstate and Foreign Commerce with the Intent to Evade a Support Obligation Greater than \$5,000 in violation of 18 U.S.C. §§ 228(a)(2) and (c)(2); and Willful Failure To Pay a Child Support Obligation for A Child Who Resides in Another



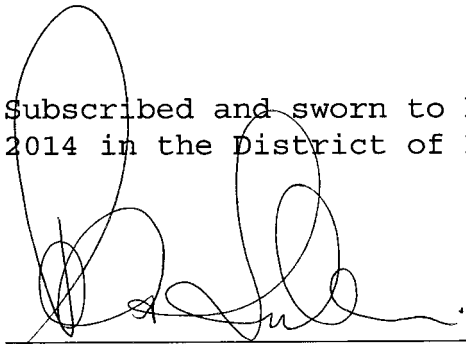
State in an Amount Greater than \$10,000 in violation  
of 18 U.S.C. §§ 228(a)(3) and (c)(2).



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PETER COTE  
Special Agent  
Department of Health and Human  
Services  
Office of Inspector General  
Office of Investigations

Subscribed and sworn to before me, this 22<sup>nd</sup> day of December,  
2014 in the District of Rhode Island.



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PATRICIA A. SULLIVAN  
U.S. MAGISTRATE JUDGE  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

**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

USA vs.  
 Defendant: CHRISTOPHER CARROLL

Name of District Court, and/or Judge/Magistrate Location (City)  
 UNITED STATES DISTRICT COURT RHODE ISLAND  
 DISTRICT OF RHODE ISLAND Divisional Office

Address:

**REDACTED**

Name 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) RICHARD W. ROSE

Interp

Birth Date 11/2

le)

Social Sec. \_\_\_\_\_

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
 Department of Health & Human Services/OIG

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

SHOW DOCKET NO.

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

MAG. JUDGE CASE NO.

Place of offense RHODE ISLAND County \_\_\_\_\_

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 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	18 U.S.C. § 228(a)(2) and (c)(2)	Travelling in interstate & foreign commerce with the intent to evade a support obligation.	<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
	18 U.S.C. § 228(a)(3) and (c)(2)	Willful failure to pay legal child support obligation.	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor