

FILED  
APR 23 2019  
U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

STEFAN GAYE  
EDMILSON RODRIGUES  
NESTOR CONCEPCION  
TERRELL WITHERSPOON  
LUIS RODRIGUEZ  
LESLIE SUSANA  
SHAUN DENNIS

Defendants

Criminal Case No. ~~19~~ 042-01WES  
In violation of 18 U.S.C. §§ 1349, 1344

INDICTMENT

The Grand Jury charges that:

COUNT 1  
(Conspiracy to Commit Bank Fraud)

Introduction

1. At all times relevant to this Indictment, Citizens Bank, Bank of America, TD Bank, and Bank Newport (collectively, the "financial institutions") were financial institutions doing business in the District of Rhode Island and elsewhere. The deposits of the financial institutions were federally insured by the Federal Deposit Insurance Corporation.

2. At all times relevant to this Indictment, the financial institutions maintained accounts into which customers could deposit checks and withdraw cash.

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U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

The Conspiracy

3. Beginning on or about May 1, 2013, and continuing to on or about March 31, 2019, in the District of Rhode Island and elsewhere, defendants **STEFAN GAYE, EDMILSON RODRIGUES, TERRELL WITHERSPOON, NESTOR CONCEPCION, LUIS RODRIGUEZ, LESLIE SUSANA, SHAUN DENNIS** together with others known and unknown to the Grand Jury knowingly, willfully, and unlawfully combined, conspired and agreed together and with each other to commit bank fraud, by knowingly executing and attempting to execute a scheme and artifice to defraud the financial institutions and to obtain moneys, funds, assets, and other property owned by, and under the custody and control of the financial institutions by means of false and fraudulent pretenses, representations, and promises, contrary to 18 U.S.C. § 1344.

Object of the Conspiracy

4. It was the object and purpose of the conspiracy for defendants, **STEFAN GAYE, EDMILSON RODRIGUES, TERRELL WITHERSPOON, NESTOR CONCEPCION, LUIS RODRIGUEZ, LESLIE SUSANA, SHAUN DENNIS** to fraudulently obtain moneys under the control of financial institutions by depositing counterfeit checks into account holders' bank accounts and rapidly withdrawing cash from those accounts thereafter.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that some of the defendants created counterfeit checks drawn on the accounts of legitimate businesses and actual individuals.

6. It was further part of the conspiracy that some of the defendants deposited counterfeit checks into the bank accounts of individuals they agreed to pay for allowing counterfeit checks to be deposited into their accounts.

7. It was further part of the conspiracy that some of the defendants recruited and agreed to pay individuals to deposit counterfeit checks into their personal bank accounts.

8. It was further part of the conspiracy that defendants **STEFAN GAYE, EDMILSON RODRIGUES, TERRELL WITHERSPOON, NESTOR CONCEPCION, LUIS RODRIGUEZ, LESLIE SUSANA, and SHAUN DENNIS** deposited or otherwise

caused to be deposited the counterfeit checks into the accounts of the willing participants and to later make cash withdrawals from their accounts.

9. It was further part of the conspiracy that defendants **STEFAN GAYE, EDMILSON RODRIGUES, TERRELL WITHERSPOON, and NESTOR CONCEPCION**, and others regularly exchanged text messages concerning complicit account holders, copies of ATM receipts evidencing deposits of counterfeit checks into bank accounts, photographs of ATM debit cards and the personal identification information of complicit account holders.

10. It was further part of the conspiracy that defendants **STEFAN GAYE, EDMILSON RODRIGUES, TERRELL WITHERSPOON, NESTOR CONCEPCION, LUIS RODRIGUEZ, LESLIE SUSANA and SHAUN DENNIS** and others caused rapid withdrawals of cash from the bank accounts into which counterfeit checks were deposited resulting in a loss to the depository institution.

**Acts In Furtherance Of Conspiracy**

11. In furtherance of the conspiracy and to accomplish its objectives and purposes, the following acts, among others, were committed by one or more of the co-conspirators in the District of Rhode Island and elsewhere:

12. On or about May 30, 2013, in Franklin, Massachusetts, **STEFAN GAYE**, deposited a counterfeit check number 22130 in the amount of \$4,409.60, drawn on the PNC Bank account of Elliot & Sangster CPAs into the Citizens Bank account of B. Tate.

13. On or about May 31, 2013, in Lincoln, Rhode Island, STEFAN GAYE, acting with others, caused a \$3,212.99 withdrawal to be made from the Citizens Bank account of B. Tate.

14. On or about June 11, 2013, in Providence, Rhode Island, STEFAN GAYE, deposited a counterfeit check number 21330 in the amount of \$4,607.23, drawn on the Rockland Trust account of SHP Financial into the Citizens Bank account of A. Flaz.

15. On or about June 12, 2013, in Lincoln, Rhode Island, STEFAN GAYE, acting with others, attempted to withdraw \$3,800 from the Citizens Bank Account of A. Flaz.

16. On or about August 2, 2013, in Cranston, Rhode Island, STEFAN GAYE, deposited a counterfeit check number 3108 in the amount of \$6,582.72 drawn on the CitBank account of Century 21 into the Citizens Bank account of S. Dickson.

17. On or about October 18, 2013, in Milford, Massachusetts, STEFAN GAYE, deposited a counterfeit check number 40809 in the amount of \$4,900.89 drawn on the Pawtucket credit Union account of ARC into the Citizens Bank account of K. Rodriguez.

18. On or about October 19, 2013, in Coventry, Rhode Island, STAFAN GAYE and others used the Citizens Bank ATM card of K. Rodriguez to make a purchase debiting the account into which the counterfeit check was deposited.

19. On or about October 12, 2016, in Providence, Rhode Island, STEFAN GAYE, deposited a counterfeit check number 26173 in the amount of \$9,462.44, drawn

on the Citizens Bank account of Franco Enterprises, Inc. into the Citizens Bank account of A. Johnson.

20. On or about October 12, 2016, in Providence, Rhode Island, STEFAN GAYE, deposited a counterfeit check number 7459432 in the amount of \$3,749.65, drawn on the Santander Bank account of The State of Rhode Island, into the Citizens Bank account of A. Johnson.

21. On or about October 13, 2016, in Providence, Rhode Island, STEFAN GAYE, using an automated teller machine (ATM) withdrew \$1,140.00 in cash from the Citizens Bank from the Citizens Bank account of A. Johnson.

22. On or about October 13, 2016, in Providence, Rhode Island, STEFAN GAYE, caused A. Johnson to enter the Citizens Bank on Hope Street in Providence, Rhode Island and withdraw \$5000 in cash from A. Johnson's Citizens Bank.

23. On or about June 8, 2017, in Providence, Rhode Island, EDMILSON RODRIGUES, deposited a counterfeit check number 18469261, in the amount of \$4,252.00, drawn on the Bank of America account of USAA Casualty Insurance Company, into his Bank of America account.

24. On or about June 12, 2017, in Providence, Rhode Island, EDMILSON RODRIGUES, deposited a counterfeit check number 18538264, in the amount of \$7,251.00, drawn on the Bank of America account of USAA Casualty Insurance Company, into his Bank of America account.

25. On or about June 12, 2017, in Providence, Rhode Island, EDMILSON RODRIGUES, caused a \$3,000.00 withdrawal to be made from his Bank of America account resulting in a loss to Bank of America.

26. On or about February 12, 2018, in South Attleboro, Massachusetts, EDMILSON RODRIGUES, caused a counterfeit check number 10097266, in the amount of \$5,921.63, drawn on the Metabank account of Individual Assurance Company Life, Health & Accident Claims, into the Citizens Bank account of LESLIE SUSANA.

27. On or about February 13, 2018, in Franklin, Massachusetts, LESLIE SUSANA along with EDMILSON RODRIGUES, withdrew \$5000 in cash from LESLIE SUSANA's Citizens Bank account resulting in a loss to Citizens Bank.

28. On or about March 9, 2017, in Providence, Rhode Island, STEFAN GAYE, deposited a counterfeit check number 65418 in the amount of \$3,970, drawn on the Bank of America account of East Bay Community Action Program, into the Citizens Bank account of F. Carrasco.

29. On or about March 9, 2017, in Providence, Rhode Island, STEFAN GAYE, deposited a counterfeit check number TR7295146 in the amount of \$4,360.11, drawn on the Citizens Bank account of State of Rhode Island and Providence Plantations, into the Citizens Bank account of F. Carrasco.

30. On or about March 10, 2017, in Providence, Rhode Island, STEFAN GAYE caused F. Carrasco to enter the Citizens Bank and withdraw \$7000 in cash from F. Carrasco's Citizens Bank account.

31. On or about April 26, 2018, in Cranston, Rhode Island, EDMILSON RODRIGUES, caused a counterfeit check number 205979 in the amount of \$8,711.72 drawn on the Citizens Bank account of The Institute for the Study and Practice of Nonviolence, into the Citizens Bank account of E. Espinal.

32. On or about June 15, 2018, J.A. sent a text message to STEFAN GAYE of an image of a Bank of America deposit slip documenting the deposit of a counterfeit check number 504231 drawn on the Bank of America account of Bryant University into the Bank of America account of G. Cedeno.

33. On or about June 15, 2018, J.A., in Providence, Rhode Island, caused a counterfeit check number 504231 in the amount of \$7,941.88 drawn on the Bank of America account of Bryant University, into the Bank of America account of G. Cedeno.

34. On or about June 19, 2018, G. Cedeno, in Providence, Rhode Island, withdrew \$7,500 in cash from the Bank of America account of G. Cedeno resulting in a loss to Bank of America.

35. On or about June 15, 2018, J.A. sent a text message to STEFAN GAYE of an image of a Bank of America deposit slip documenting the deposit of a counterfeit check



number 504352 drawn on the Bank of America account of Bryant University into the account of K. Almonte.

36. On or about June 15, 2018, J.A., in Providence, Rhode Island, caused a counterfeit check number 504352 in the amount of \$8,963 drawn on the Bank of America account of Bryant University, into the Bank of America account of K. Almonte at the University Heights, Providence, Rhode Island branch of Bank of America.

37. On or about June 19, 2018, EDMILSON RODRIGUES, sent a text message to STEFAN GAYE of an image of a Bank of America deposit slip documenting the deposit of a counterfeit check number 504421 drawn on the Bank of America account of Bryant University into the Bank of America account of J. Duarte.

38. On or about June 21, 2018, in Providence, Rhode Island, EDMILSON RODRIGUES, STEFAN GAYE and others caused J. Duarte to withdraw \$8,500 from his Bank of America Account resulting in a loss to Bank of America.

39. On or about June 20, 2018, NESTOR CONCEPCION, in South Attleboro, Massachusetts, caused a counterfeit check number 504485 in the amount of \$12, 141.00 drawn on the Bank of America account of Bryant University, into the Bank of America account of D. Goncalves.

40. On or about June 20, 2018, NESTOR CONCEPCION sent an electronic message to STEFAN GAYE that included a photograph of a Bank of America ATM deposit slip documenting the deposit of a counterfeit check number 504485 in the

amount of \$12, 141.00 drawn on the Bank of America account of Bryant University, into the Bank of America account of D. Goncalves.

41. On or about June 21, 2018, NESTOR CONCEPCION, in Providence, Rhode Island, caused \$8,300.00 in cash to be withdrawn from the Bank of America account of D. Goncalves resulting in a loss to Bank of America.

42. On or about July 30, 2018, in Providence, Rhode Island TERRELL WITHERSPOON, caused a counterfeit check number 197731833 in the amount of \$7,400.00, drawn on the Bank of America account of Geico General Insurance Co, into the Citizens Bank account of D. Giannotti.

43. On or about July 30, 2018, in Providence, Rhode Island TERRELL WITHERSPOON, caused a counterfeit check number SE 0002010017 in the amount of \$6,350.10, drawn on the Bank of America account of Life Insurance Co of North America, into the Citizens Bank account of D. Giannotti.

44. On or about August 1, 2018, in Central Falls, Rhode Island, EDMILSON RODRIGUES, caused D. Giannotti to enter the Citizens Bank and withdraw \$7,400.00 in cash from D. Giannotti's Citizens Bank account.

45. On or about August 1, 2018, in Attleboro, Massachusetts, EDMILSON RODRIGUES, caused D. Giannotti to enter the Citizens Bank and withdraw \$6,000.00 in cash from D. Gianotti's Citizens Bank account.

46. On or about October 1, 2018, in Wakefield, Rhode Island, EDMILSON RODRIGUES, caused a counterfeit check number 4016564 in the amount of \$8,000.00, drawn on the Citizens Bank account of Bay Cove Human Services, Inc., into the Citizens Bank account of R. Cruz.

47. On or about October 2, 2018, in Providence, Rhode Island, EDMILSON RODRIGUES, caused R. Cruz to withdraw \$7,500.00 in cash from her Citizens Bank account resulting in a loss to Citizens Bank.

48. On or about December 4, 2018, in Newport, Rhode Island, TERRELL WITHERSPOON, caused a counterfeit check number 4824 in the amount of \$2,100 drawn on the Bank Newport account of J. Hebert, to be deposited into the Bank Newport account of TERRELL WITHERSPOON.

49. On or about December 18, 2018, in Providence, Rhode Island, EDMILSON RODRIGUES, caused a counterfeit check number 201681759 in the amount of \$7,800.00 drawn on the Bank of America account of Geico General Insurance, Co., to be deposited into the Bank of America account of C. Spooner.

50. On or about December 20, 2018, in Providence, Rhode Island, EDMILSON RODRIGUES, withdrew \$980.00 from the Bank of America account of C. Spooner. Later that same day, EDMILSON RODRIGUES, caused C. Spooner to withdraw \$2000.00 in cash from her Bank of America account both withdrawals resulting in a loss to Bank of America.

51. On or about January 11, 2019, in Providence, Rhode Island, NESTOR CONCEPCION, and SHAUN DENNIS caused a counterfeit check number 1315047 in the amount of \$6,133.28 drawn on the Bank of America account of Beacon Mutual, to be deposited into the Bank of America account of K. Williams.

52. On or about February 26, 2019, SHAUN DENNIS in Providence, Rhode Island, deposited a counterfeit check number 36182 in the amount of \$7,500 drawn on the Citizens Bank account of Tri-Century Insurance Company into his Citizens Bank account.

53. On or about February 28, 2019, EDMILSON RODRIGUES in North Providence, Rhode Island, deposited a counterfeit check number 16497 in the amount of \$8,700.00 drawn on the Bank of America account of Vincent A. DesCesare into the Bank of America account of K. Yeboah.

54. On or about February 28, 2019, EDMILSON RODRIGUES in North Providence, Rhode Island, deposited a counterfeit check number 16472 in the amount of \$8000.00 drawn on the Bank of America account of Vincent A. DesCesare into the Bank of America account of R. Aleman.

All in violation of 18 U.S.C. § 1349.

**COUNTS 2 - 19**  
(Bank Fraud)

55. The Grand Jury realleges and incorporates by reference paragraphs 1-54 of Count 1 above as if fully set forth herein.

56. On the dates listed in the below chart, defendants executed and attempted to execute a scheme to defraud the below-listed financial institutions and to obtain monies, funds and property owned by and under the custody of the financial institutions by means of the false and fraudulent representations and promises described below:

Count	Financial Institution	Date	Means of Executing Scheme to Defraud
2	Citizens Bank	5/31/2013	STEFAN GAYE and others deposited a counterfeit check in the amount of \$4,607.23 into the account of A. Flaz.
3	Citizens Bank	8/2/2013	STEFAN GAYE and others deposited a counterfeit check in the amount of \$6,582.72 into account of S. Dickson
4	Citizens Bank	10/12/2016	STEFAN GAYE and others deposited a counterfeit check in the amount of \$9,462.44 into the account of A. Johnson.
5	Citizens Bank	10/12/2016	STEFAN GAYE and others deposited a counterfeit check in the amount of \$3,749.65 into the account of A. Johnson.
6	Bank of America	6/8/2017	EDMILSON RODRIGUES and others deposited a counterfeit check in the amount of \$4,252 into his account at Bank of America.
7	Bank of America	6/12/2017	EDMILSON RODRIGUES and others deposited a counterfeit check in the amount of \$7,251 into his account at Bank of America.

8	Citizens Bank	2/12/2018	EDMILSON RODRIGUES, LESLIE SUSANA and others deposited a counterfeit check in the amount of \$5,921.63 into the account of LESLIE SUSANA.
9	Citizens Bank	3/9/2017	STEFAN GAYE and others deposited a counterfeit check in the amount of \$3970 into the account of F. Carrasco
10	Citizens Bank	3/9/2017	STEFAN GAYE and others deposited a counterfeit check in the amount of \$4,360.11 into the account of F. Carrasco
11	Citizens Bank	4/26/2018	EDMILSON RODRIGUES and others deposited a counterfeit check in the amount of \$8,711.72 into the account of E. Espinal.
12	Bank of America	6/15/2018	LUIS RODRIGUEZ and others deposited a counterfeit check in the amount of \$7,941.88 into the account of G. Cedeno.
13	Citizens Bank	7/30/2018	TERRELL WITHERSPOON and others deposited a counterfeit check in the amount of \$7,400 into the account of D. Giannotti.
14	Citizens Bank	7/30/2018	TERRELL WITHERSPOON and others deposited a counterfeit check in the amount of \$6,350.10 into the account of D. Giannotti.
15	Citizens Bank	10/1/2018	EDMILSON RODRIGUES and others deposited a counterfeit check in the amount of \$8000 into the account of R. Cruz.
16	Bank Newport	12/4/2018	TERRELL WITHERSPOON and others deposited a counterfeit check in the amount of \$2,100 into his account at Bank Newport.
17	Bank of America	12/18/2018	EDMILSON RODRIGUES and others deposited a counterfeit check in the amount of \$7,800 into the account of C. Spooner.

18	Bank of America	1/11/2019	NESTOR CONCEPCION and others deposited a counterfeit check in the amount of \$6,133.28 into the account of K. Williams.
19	Bank of America	2/28/2019	EDMILSON RODRIGUES and others deposited a counterfeit check in the amount of \$8,700.00 into the account of K. Yeboah.

Each in violation of 18 U.S.C. § 1344.

**REDACTED**

Foreperson of the Grand Jury

Date: 4/23/19

AARON WEISMAN  
United States Attorney

By: *William J. Ferland*  
WILLIAM J. FERLAND  
Assistant U.S. Attorney

*Richard Myrus*  
RICHARD MYRUS  
First Assistant United States Attorney

**PAB**

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

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO. USA vs. 19 042-01NES  
 Defendant: Stefan Gaye

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 William J. Ferland  
 (if assigned)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
USSS ~ Brian Sindoni, Special Agent

- 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.

Place of offense RHODE ISLAND County

Ac  
**REDACTED**

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

Alien applicable)

This report amends AO 257 previously submitted

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

Total # of Counts 7

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Bank Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 30 years/ Fine: \$1,000,000	Supervised Release: 5 years/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
2-5	18 U.S.C. § 1344	Bank Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
9-10	Imprisonment: 30 years/ Fine: \$1,000,000	Supervised Release: 5 years/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor



PAS  
042-00  
WES

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

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO. ~~19-042-00~~ 19 042-00

Matter Sealed:  Juvenile  Other than Juvenile  
 Pre-Indictment Plea  Superseding  Defendant Added  
 Indictment  Charges/Counts Added  
 Information

USA vs.  
 Defendant: Edmilson Rodrigues

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

Adc

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 (if assigned) William J. Ferland

Bir Da

REDACTED

Alien plicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)  
 USSS ~ Brian Sindoni, Special Agent

So

- 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.

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

Place of offense RHODE ISLAND County

This report amends AO 257 previously submitted

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

Total # of Counts 8

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349 Imprisonment: 30 years/ Fine: \$1,000,000	Conspiracy to Commit Bank Fraud Supervised Release: 5 years/ Special Assessment: \$100	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
6-8, 11	18 U.S.C. § 1344 Imprisonment: 30 years/ Fine: \$1,000,000	Bank Fraud Supervised Release: 5 years/ Special Assessment: \$100	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
15, 17	18 U.S.C. § 1344 Imprisonment: 30 years/ Fine: \$1,000,000	Bank Fraud Supervised Release: 5 years/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
19		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

PER 18 U.S.C. 3170

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

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO. ~~19-042~~ **19-042-03W/S**

Matter Sealed:  Juvenile  Other than Juvenile  
 Pre-Indictment Plea  Superseding  Defendant Added  
 Indictment  Charges/Counts Added  
 Information

USA vs.  
 Defendant: Nestor Concepcion

Add \_\_\_\_\_

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

**REDACTED**

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 (if assigned) William J. Ferland

Birth Date \_\_\_\_\_ Alien (plicable) \_\_\_\_\_

So \_\_\_\_\_

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)  
 USSS ~ Brian Sindoni, Special Agent

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 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349 Imprisonment: 30 years/ Fine: \$1,000,000	Conspiracy to Commit Bank Fraud Supervised Release: 5 years/ Special Assessment: \$100	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
18	18 U.S.C. § 1344 Imprisonment: 30 years/ Fine: \$1,000,000	Bank Fraud Supervised Release: 5 years/ Special Assessment: \$100	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

PER 18 U.S.C. 3170

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

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO. 19-042

Matter Sealed:  Juvenile  Other than Juvenile  
 Pre-Indictment Plea  Superseding  Defendant Added  
 Indictment  Charges/Counts Added  
 Information

USA vs.  
 Defendant: Terrell Witherspoon

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

Add \_\_\_\_\_  
 \_\_\_\_\_

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 (if assigned) William J. Ferland

**REDACTED**

**PROCEEDING**

Birth Date \_\_\_\_\_  
 Alien (alienable) \_\_\_\_\_

Name of Complainant Agency, or Person (& Title, if any)  
USSS ~ Brian Sindoni, Special Agent

Sex \_\_\_\_\_

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. \_\_\_\_\_

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

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

This report amends AO 257 previously submitted

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

Total # of Counts 4

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Bank Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 30 years/ Fine: \$1,000,000	Supervised Release: 5 years/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
13-14	18 U.S.C. § 1344	Bank Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
16	Imprisonment: 30 years/ Fine: \$1,000,000	Supervised Release: 5 years/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

PAS

PER 18 U.S.C. 3170

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

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO: ~~19-042-05125~~ **19 042-05125**

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 (if assigned): William J. Ferland

USA vs. Defendant: Luis Rodriguez

Address: **REDACTED**  
 Birth Date: \_\_\_\_\_ (if alien, alien (alienable))

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
USSS ~ Brian Sindoni, Special Agent

- 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.

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 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Bank Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 30 years/ Fine: \$1,000,000	Supervised Release: 5 years/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
12	18 U.S.C. § 1344	Bank Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 30 years/ Fine: \$1,000,000	Supervised Release: 5 years/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

PER 18 U.S.C. 3170

**PAS**  
**042-06WIS**

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 (if assigned) William J. Ferland

USA vs.  
 Defendant: Leslie Susana  
 Address \_\_\_\_\_  
 Birth Date \_\_\_\_\_  
 Sex \_\_\_\_\_  
 (lien applicable)

**REDACTED**

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)  
USSS ~ Brian Sindoni, Special Agent

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 re prosecution 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.

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

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

This report amends AO 257 previously submitted

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

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349 Imprisonment: 30 years/ Fine: \$1,000,000	Conspiracy to Commit Bank Fraud Supervised Release: 5 years/ Special Assessment: \$100	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
8	18 U.S.C. § 1344 Imprisonment: 30 years/ Fine: \$1,000,000	Bank Fraud Supervised Release: 5 years/ Special Assessment: \$100	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

**YPS**  
PER 18 U.S.C. 3170

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

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO. ~~19~~ **042-07 WES**  
USA vs.  
Defendant: Shaun Dennis

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 (if assigned) William J. Ferland

Add: \_\_\_\_\_  
**REDACTED**  
Birth Date: \_\_\_\_\_ (alien applicable)  
Social Security: \_\_\_\_\_

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
USSS ~ Brian Sindoni, Special Agent

- 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. \_\_\_\_\_

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

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

This report amends AO 257 previously submitted

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

Total # of Counts 2 yf

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Bank Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 30 years/ Fine: \$1,000,000	Supervised Release: 5 years/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor