

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ALLEGHENY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

MDJ: Hon. RICHARD G KING
Magisterial District Number: 05-3-14
Address: 2213 BROWNSVILLE ROAD
PITTSBURGH, PA 15210

Phone: 412.884.1511

DEFENDANT: KRISTOFF CAIN
(NAME and ADDRESS):
First Name Middle Name Last Name Gen.

NCIC Extradition Code Type

Felony - Full Extradition
Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed	OTN/LiveScan Number G 805941-3	Complaint/Incident Number BNG0013-16	SID:	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 08/29/1995	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>	
RACE BLACK	First Name		Middle Name	Last Name	Gen.
ETHNICITY	AKA				
HAIR COLOR BLK (BLACK)			EYE COLOR BRO (BROWN)		
Driver License	State	License Number	Expires:	WEIGHT (lbs.)	
DNA	DNA Location				
FBI Number	MNU Number		Ft. HEIGHT in.		
Defendant Fingerprinted					
Fingerprint Classification					

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat	Registration Sticker (MM/YY)	Comm'l Veh. Ind.	School Veh.	Oth. NCIC Veh. Code	Reg. Same as Def.
VIN	Year	Make	Model	Style	Color	<input type="checkbox"/>	

Office of the attorney for the Commonwealth Approved Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

Kate Wymard Kaunmael 4-20-18
name of the attorney for the Commonwealth (Signature of the attorney for the Commonwealth) (Date)

I, TIMOTHY NUTTER PAAG428
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of ATTORNEY GENERAL PA0222400
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

1. X I accuse the above named defendant who lives at the address set forth above
I accuse the defendant whose name is unknown to me but who is described as _____

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have, therefore, designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at 301 PITTSBURGH CITY
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 10/01/2016 0:01
(County Code)



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Defendant Name	First: KRISTOFF	Middle:	Last: CAIN

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINS) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
X	1	911	B3	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 911B3 CORRUPT ORGANIZATION F1 1 COUNT									
The actor, employed by or associated with an enterprise, conducted or participated, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, namely, THEFT BY DECEPTION in violation of 18 Pa. C.S. §911(b)(3).									

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
	2	911	B4	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 911B4 CORRUPT ORGANIZATION F1 1 COUNT									
The actor conspired with AUDREY HUFF et al to violate any of the provisions of subsections (1),(2) or (3) of Section 911(b) of the Pennsylvania Crimes Code, in violation of 18 Pa. C.S. §911(b)(4).									



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	3922	A1	of the	18	2	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone			<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 3922A1 THEFT BY DECEPTION F3 2 COUNTS									
The actor intentionally obtained or withheld property, namely, \$25,000 with a total value greater than \$2,000 belonging to ANDREW HUTCHINSON by deception, in violation of, 18 Pa. C.S. §3922.									
The actor intentionally obtained or withheld property, namely, \$30,000 PLUS with a total value greater than \$2,000 belonging to LYNN DOOLITTLE by deception, in violation of, 18 Pa. C.S. §3922.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	3922	A3	of the	18	2	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone			<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 3922A3 THEFT BY DECEPTION F3 2 COUNTS									
The actor intentionally obtained or withheld property, namely, \$25,000 belonging to ANDREW HUTCHINSON by failing to correct a false impression which the actor previously created or reinforced or which the actor knew to be influencing another to whom the actor stood in a fiduciary or confidential relationship, in violation of 18 Pa.C.S. §3922(a)(3).									
The actor intentionally obtained or withheld property, namely, \$30,000 PLUS belonging to LYNN DOOLITTLE by failing to correct a false impression which the actor previously created or reinforced or which the actor knew to be influencing another to whom the actor stood in a fiduciary or confidential relationship, in violation of 18 Pa.C.S. §3922(a)(3).									



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
Lead?	5	3922	A1	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 903A1 CRIMINAL CONSPIRACY F3 1 COUNT									
The actor, with the intent of promoting or facilitating the crime of 18:3922:A1 conspired and agreed with AUDREY HUFF et al that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									



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- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S.§4904) relating to unsworn falsification to authorities.
- This complaint is comprised of the preceding page(s) numbered _____ through _____

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

 (Date) (Signature of Affiant)

AND NOW, on this date 4-20-18 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

05-3-14 _____
 (Magisterial District Court Number) (Issuing Authority)

**RICHARD G. KING,
 MAGISTERIAL DISTRICT JUDGE
 MAGISTERIAL DISTRICT 05-3-14
 MY COMMISSION EXPIRES ON THE
 FIRST MONDAY IN JANUARY, 2024**





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AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:
10/1/2016
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:
10/1/2016

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):
Information Received from ongoing investigation
- b) How the source of information knows this particular person committed the crime:
Personal Observations
- c) How both Affiant and/or source of information knows that a particular crime has been committed:
Personal Observations - Information Received from Victim and Co-conspirators

3. WHAT CRIMES:

18 903 A1 CRIMINAL CONSPIRACY
 18 3922 A1 THEFT BY DECEPTION
 18 3922 A3 THEFT BY DECEPTION
 18 911 B3 CORRUPT ORGANIZATION
 18 3922 A3 THEFT BY DECEPTION
 18 3922 A1 THEFT BY DECEPTION
 18 911 B4 CORRUPT ORGANIZATION

4. WHERE CRIME(S) COMMITTED:

323 SPENCER AVENEU, PITTSBURGH PA 15227

5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.
 Source has given information in the past which has led to arrest and/or conviction
 Defendant's reputation for criminal activity
- X This source made declaration against his/her penal interest to the above offense
- X Affiant and/or other Police Officers corroborated details of the information



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SUMMARY

The PA Office of Attorney General conducted an investigation into a reported large scale Jamaican based phone scam that has defrauded elderly people from Pennsylvania and around the country out of millions of dollars. A individual known as "Patrick Williams" later identified as Kristoff Cain, believed to be from Jamaica, is scamming elderly United States citizens from around the country, including Pennsylvania, with the assistance of Audrey Huff. Specifically, Kristoff Cain and/or his co-conspirators direct unsuspecting elderly victims to send their money to Audrey Huff's residence in Allegheny County, Pennsylvania. Kristoff Cain and/or his co-conspirators track said packages of money and immediately alert Huff of the package's pending arrival. Huff signs for the package, removes the contents (typically thousands of dollars in United States currency) and wires the proceeds to Jamaica as directed by Kristoff Cain and/or his co-conspirators.

The joint investigation conducted by the Pennsylvania Office of Attorney General, Organized Crime Section, Western Regional Office, the Pittsburgh Bureau of Police and the United States Postal Service (USPS), commenced in October 2016. The investigation revealed that Huff has been engaging in this behavior for 8-9 years and has been notified and ordered to stop her involvement with this Jamaican based phone scam on 4 separate occasions by the United States Secret Service, United States Postal Service and Pennsylvania Office of Attorney General. Despite these orders, Huff continued to engage in this behavior, until the PA Office of Attorney General filed charges against Audrey Huff.

FINDINGS OF FACT

Pennsylvania Office of Attorney General, Organized Crime Section, Western Regional Office Special Agent Timothy J. Nutter was the lead investigator concerning the theft by deception committed by Audrey Huff.

VICTIM: LYNN BERNICE DOOLITTLE (74 YOA)

In October 2016, 74-year-old Lynn Bernice Doolittle from Saint Paul, MN, sent a handwritten letter to the Pittsburgh Police Department requesting assistance. In her note, Lynne Doolittle wrote that in September 2016, she was contacted by alleged FBI agent "James Glaskow" and he told her that her bank, TCF, was being investigated for fraud and that she needed to mail him all of her money. "Glaskow" would open up a new bank account for Doolittle and mail her new checks. Doolittle went to TCF three times over the course of three weeks and withdrew a total of \$32,874.78 in cash and, as instructed by "Glaskow," sent the money to Jennifer Lennox at 323 Spencer Avenue, Pittsburgh, PA 15227.

Doolittle provided law enforcement with a UPS tracking number for one of the packages that she sent to 323 Spencer Street, Pittsburgh, PA 15227. Special Agent Lee Yingling, Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, ran the UPS tracking number and learned that the package was delivered on September 8, 2016 to Pittsburgh, PA was received by someone named "Lennox."

On November 11, 2016, SA Yingling was able to identify and speak with the UPS driver who delivered the package to 323 Spencer Avenue, Pittsburgh, PA 15227. The UPS driver recalled the delivery and said that a woman was standing on the front porch of 323 Spencer Avenue when he arrived with the package. As the UPS driver pulled in front of the residence, the woman left the porch and started down the steps toward the street. The UPS driver met her half way up the steps and handed her the package. The UPS driver recalled the woman signing for the package as "Jennifer Lennox." The UPS driver described the woman as a frail, black female in her 60's with a very big and distinctive mole on her cheek.

On November 15, 2016, SA Yingling conducted surveillance on 323 Spencer Avenue, Pittsburgh, PA 15227. SA Yingling observed an elderly black female exit the front door of 323 Spencer Avenue. The woman appeared to have difficulty descending the steps and was walking using the assistance of a cane. SA Yingling approached the woman, identified himself and engaged the woman in conversation. When asked what her first name was she stated, "Audrey." The woman was described as being in her late 60's and having a very large, distinctive mole or birth mark on her left cheek.

SA Yingling recalled looking at the names located on the mailboxes of 323 Spencer Avenue and the name on the outside of a mailbox for Apartment #2 was Audrey Huff. A check of databases available to law enforcement revealed an Audrey L. Huff, DOB 09/29/1944, with an address of 323 Spencer Avenue, Apt #2, Pittsburgh, PA 15227. SA Yingling then viewed a driver's license photo of Audrey L. Huff and positively identified her as the woman exiting 323 Spencer Avenue, Pittsburgh, PA 15227.



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Based upon information provided by victim Doolittle, SA Yingling obtained a search warrant for records associated with UPS packages delivered to 323 Spencer Avenue, Pittsburgh PA 15227. Records provided by UPS support Doolittle's statement and confirm three (3) deliveries to Huff's address on September 7, 8 and 9, 2016.

On January 9, 2017, Special Agent Gregory Matthews, Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, contacted MoneyGram. SA Matthews requested and received transactional data associated with Huff in reference to MoneyGram transactions to Jamaica from September 7, 2016 to September 9, 2016.

Records provided by MoneyGram confirm Huff wired funds to Jamaica on the following dates:

- September 7, 2016, at 10:36:01 AM, Audrey Huff wired \$1,500.00 USD to MARLON ROBINSON in Jamaica;
- September 7, 2016, at 11:48:22 AM, Audrey Huff wired \$1,500.00 USD to HASBOURNE FERGUSON in Jamaica;
- September 7, 2016, at 2:19:35 PM, Audrey Huff wired \$1,500.00 USD to HASBOURNE FERGUSON in Jamaica;
- September 7, 2016, at 3:58:03 PM, Audrey Huff wired \$1,500.00 USD to HASBOURNE FERGUSON in Jamaica;
- September 8, 2016, at 10:49:51 AM, Audrey Huff wired \$1,900.00 USD to HASBOURNE FERGUSON in Jamaica;
- September 8, 2016, at 1:25:14 PM, Audrey Huff wired \$1,700.00 USD to HASBOURNE FERGUSON in Jamaica;
- September 8, 2016, at 3:42:07 PM, Audrey Huff wired \$1,500.00 USD to MARLON ROBINSON in Jamaica;
- September 8, 2016, at 4:14:20 PM, Audrey Huff wired \$1,700.00 USD to HASBOURNE FERGUSON in Jamaica;
- September 9, 2016, at 12:09:02 PM, Audrey Huff wired \$1,900.00 USD to HASBOURNE FERGUSON in Jamaica;
- September 9, 2016, at 12:04:05 PM, Audrey Huff wired \$1,500.00 USD to HASBOURNE FERGUSON in Jamaica;
- September 9, 2016 at 3:44:15 PM Audrey Huff wired \$1,700.00 USD to HASBOURNE FERGUSON in Jamaica; and
- September 9, 2016, at 3:40:42 PM, Audrey Huff wired \$1,800.00 USD to HASBOURNE FERGUSON in Jamaica.

MoneyGram was also able to provide a contact number of (412) 689-9043 for Huff. SA Nutter received call detail records (CDRs) for Huff's cellular telephone. The records show that Huff had contact with person(s) from Jamaica, area code (876), from September 7, 2016 to September 9, 2016. Specifically:

- September 7, 2016: (47) contacts with (876) 410-0919 (later identified as KRISTOFF CAINS cell phone by Huff)
- September 8, 2016: (37) contacts with (876) 410-0919
- September 9, 2016: (48) contacts with (876) 410-0919

Agents from the PA Office of Attorney General, Bureau of Criminal Investigations and the Organized Crime Section, Western Regional Office (BCI/WRO and OCS/WRO), conducted an extensive background check of Audrey L. Huff with the DOB of 09/29/1944. A search showed Huff was a suspect in two (2) similar cases that had been previously investigated by the Pittsburgh Bureau of Police.

VICTIM: ANDREW HUTCHINSON (82 YOA)

In December of 2015, an 82-year-old victim from Mount Pleasant, SC, was sworn to secrecy by an alleged FBI Agent and told that there were discrepancies with his bank account and told to mail \$25,000.00 to Audrey Huff at 141 Robinson Street, Apt #3, Pittsburgh, PA 15213. This package was not recovered and the funds were lost. This case was investigated by Pittsburgh Police and United States Secret Service. During this investigation, law enforcement was able to locate and interview Huff.

During the interview, Huff said that she has been sending money to her "friends" in Jamaica for 8 years as pre-payment of taxes on a 3.5 million dollar lottery jackpot they told her she had won. She has been sending some or all of her monthly Social Security income along with at least one package full of cash sent to her home each month. The packages range from \$10,000.00 to \$25,000.00. She said she wires the money via MoneyGram from a local Walmart store. Huff also said that on December 21, 2015 she mailed approximately \$15,000.00 to a female at a Holiday Inn in Ft. Lauderdale, FL.

United States Secret Service Agent Heckman advised Huff that this was a scam. Huff was also informed by United States Postal Inspectors that this was a scam. Postal Inspectors have personally told Huff that this was a scam and that her actions were criminal. The legal department for the USPS has also served Huff with legal documentation indicating that her actions were criminal and ordered her to stop. Specifically the legal documentation states, "(1) you are using a fictitious, false or assumed name, title or address in violating 18 USC 1341 (Mail Fraud) and/or 1342 (Use of Fictitious Names); and/or (2) that letters sent in the mail are addressed to places not the residence or regular business address of the person for whom they are intended to enable



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that person to escape identification." Despite receiving these warnings in 2013, her conduct continued. A recorded phone call between the scammer who identified himself as "Trooper Phillips" and the Andrew Hutchinson was recorded during the investigation.

VICTIM: MARJORIE HANSON (96 YOA)

In August of 2015, a 96-year-old female from Prescott, AZ, was told by a perpetrator to send \$25,000.00 in cash to Audrey Huff at 141 Robinson Street, Apt #3, Pittsburgh, PA 15213. This package was intercepted by the Prescott Police Department and the funds were returned to the victim.

SA Yingling viewed 141 Robinson Street, Pittsburgh, PA 15213, and located it in the Oakland neighborhood of the City of Pittsburgh. It is described as a four-story apartment building containing numerous apartments. Joseph Anderson (Huff's paramour) is the listed resident at 141 Robinson Street, Apt #3, Pittsburgh, PA 15213.

INTERDICTION OF AUDREY HUFF

On January 23, 2017, SA Nutter was contacted by Jim Deasey who is the landlord for 323 Spencer Avenue (Huff's address). Deasey told SA Nutter that he ran into Huff on the porch of 323 Spencer Avenue and that she said she was waiting for a package. Based on this information, PA OAG Agents from the Organized Crime Section (OCS) and the Bureau of Criminal Investigations (BCI) proceeded to 323 Spencer Avenue and set up surveillance. While conducting surveillance, Agents observed Huff on the front porch.

Agents observed a UPS delivery truck arrive and deliver a package to Huff. Huff took the package into the apartment complex where she remained for a short period of time.

At this time, SA Truesdell approached the UPS driver who delivered the package. The UPS driver stated that the black female signed for the package that was addressed to ARMIE CORPS, 323 Spencer Avenue, Apt. #6, Pittsburgh PA 15227. Based upon this information, your Affiant contacted Deasey. Deasey stated that there was no ARMIE CORPS associated with any of his tenants and that his apartment complex does not have an Apartment #6.

Agents then observed Huff exit the residence and proceed to a nearby bus stop where she was observed boarding a bus headed to downtown Pittsburgh. Huff exited the bus at Wood Street at Fifth Avenue and entered the Highmark Building, where she immediately proceeded to the second floor women's restroom. Huff remained in the women's room for approximately a 2-hour time period.

Pittsburgh Police Detective Meder responded to the Highmark Building to assist with surveillance. Detective Meder checked on Huff multiple times while she was in the women's restroom. Detective Meder observed Huff in one of the stalls and she appeared to be counting something. Huff was overheard on the phone saying, "No, I didn't take any." Detective Meder also observed a UPS shipping envelope on the floor of Huff's bathroom stall.

Huff eventually exited the women's restroom, left the Highmark Building and walked to a CVS. Huff entered the CVS and proceeded to a MoneyGram wire transfer service computer. Huff looked at the computer briefly and then proceeded to take a seat in the nearby pharmacy waiting area. At this time Detective Meder took a seat next to Huff, who was now on her cellular telephone. Detective Meder could hear Huff say, "Jamaica, right?" Detective Meder could also see a large amount of US currency inside of Huff's opened purse. Detective Meder relayed this information to SA Nutter and they approached Huff before any funds could be sent to "Jamaica."

SA Nutter and Detective Meder identified themselves as law enforcement and advised Huff that they believed she was in possession of fraudulently obtained funds that she was about to send to scammers in Jamaica. Huff confirmed that she was in possession of money that she had received through UPS today and that she was intending to send it to a Romaine Williams in Jamaica. Huff accompanied investigators to the Office of Attorney General in Pittsburgh and spoke to them about this incident and allowed them to search her belongings. The following items were recovered:

- \$8,364.00 in US currency;
- (1) UPS Mailing Envelope addressed to ARMIE CORPS, 323 Spencer Avenue, Apt. 6, Pittsburgh, PA 15227, from NORLITO B. SORIANO, SR., San Jose CA – (559) 718-6517;



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- (1) Plastic sandwich bag stuffed full of MoneyGram receipts; and
- (1) Notebook containing names and numbers of Jamaican contacts.

Huff stated that approximately 9 years ago she received a call from a male who identified himself as Patrick Williams from the Jamaican Lottery. Huff said that this male congratulated her and told her that she had won over four million US dollars. Williams told Huff that in order for her to claim her prize, she would have to pay the taxes first. Huff said that at the beginning she was only able to send Williams \$740.00 per month from her \$795.00 per month Social Security check. Huff stated that approximately 8 years ago, Williams told her that generous donors would be sending her money to help her pay her taxes. Huff said that Williams would call when a package was about to arrive so she could be outside waiting. Once Huff took possession of the package, she would contact Williams for further instructions.

Williams would then tell Huff to wire the money to Jamaica and provide her the name of the recipient. Once the wire transaction was complete, Huff would then contact Williams and provide him with the reference number required to claim the funds. Huff said that she would only wire \$1,500.00 to \$2,000.00 during each transaction, as directed by Williams, and that she would typically do multiple wire transactions over several days when she received larger amounts of money. Huff has been receiving one (1) to two (2) packages of cash per month for the past 8 or 9 years.

Huff said that on January 23, 2017, Williams called her from (218) 646-8288 and informed her that a package addressed to the ARMIE CORPS would be arriving at her 323 Spencer Avenue address. Huff said that after she signed for the package she went inside and called Williams who instructed her to wire the money to Romaine Williams in Jamaica. She then took a bus to town and walked to the Highmark Building where she went to the women's restroom. Huff was in the bathroom for two hours because there was a discrepancy with the funds. She said that Williams told her that the package contained \$10,000.00 and she told him that it contained \$8,364.00. Once Williams was certain that Huff did not take any money, she proceeded to a nearby CVS. Huff wanted to confirm that the money was going to Jamaica, so she sat down in the pharmacy and called Williams. Huff had previously separated the money and was about to walk to the MoneyGram computer when law enforcement approached her. Huff stated Williams calls her on her cellular telephone (412) 689-9043 and on her home phone (412) 885-3626. She stated that Williams calls from (218) 646-8288 and (876) 410-0919. Huff lies about her name in order to conduct money transfers. She also signs different names, including the name "Jennifer Lennox," when she receives packages. Huff admitted to signing "ARMIE CORPS" for the UPS package she received on January 23, 2017. Huff uses Western Union in addition to MoneyGram to wire money.

Huff was advised by SA Nutter and Attorney Mark Serge of the Office of Attorney General that the Jamaican Lottery is a scam and that she was helping Jamaican scammers defraud elderly Americans out of their life savings. Huff was instructed not to contact Williams again. Huff stated that she would change her cell phone number and stop communicating with Williams.

Call detail records show that Huff completely disregarded law enforcement's request to stop communicating with Williams and contacted him by telephone after her interview on both January 24, 2017 and January 25, 2017.

VICTIM: MARIA RIZZA

On February 22, 2017, a USPS postal inspector was advised of potential mail fraud involving a package being delivered to Huff at 323 Spencer Avenue. The postal inspector spoke with Huff on February 22, 2017 at her residence and advised her of the suspected mail fraud. Huff told the postal inspector that she won the Jamaican lottery and was to send money to Patrick Williams in Jamaica for taxes she owes on her lottery winnings. Huff gave (813)463-0468 as a phone number for Williams. The postal inspector did not deliver the package to Huff and instead interdicted it.

Huff was notified by the postal inspector that the Jamaican Lottery is a scam and that she was helping Jamaican scammers defraud elderly Americans out of their life savings. Huff was instructed to stop her involvement with the scam. She was also informed that if she continued to engage in this behavior she could face criminal and/or civil charges. Huff signed a Voluntary Discontinuance Agreement with USPS on February 22, 2017. This Agreement states, "I have been advised that I may have been an unknowing participant in a criminal enterprise... Having been advised of the facts and circumstances of this situation, it is my decision to stop participating in any activities involving a purported sweepstakes or lottery that require me to make advance payments related to a sweepstakes of lottery prize payment. I understand that my continued participation could expose me to possible civil or criminal penalties."



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USPS reached out to Maria Rizza, the sender of the interdicted package, and received consent to open the parcel that she had sent to Huff. The parcel contained \$4,000 cash. Rizza stated she was contacted by men from New York about winning the lottery and the money she sent to Huff was a tax payment on a prize of \$3.5 million. USPS spoke to the daughter of Maria Rizza and she advised them that her mother has lost over \$250,000 in 10 years due to this scam.

A woman with a Jamaican accent claiming to be Maria Rizza contacted USPS from phone number (818)581-2011 after the package was interdicted and requested a call back. Call Detail Records indicate that Huff has contacted (818)581-2011 1,506 times from January 16, 2017 to the present.

CONTINUED CONDUCT BY AUDREY HUFF

Call Detail Records show that Huff has contacted Kristoff Cain after signing the Voluntary Discontinuance Agreement with the USPS on February 22, 2017. Specifically, records indicate that Huff spoke to Kristoff Cain at (813)463-0468 seventy-eight (78) times on her cell phone and two (2) times on her home phone from February 22, 2017 to March 1, 2017.

Further, records show that Huff began calling a Mexican Grocery Store located in the Oakland neighborhood of the City of Pittsburgh after her interview with law enforcement at the Office of Attorney General. This store houses a RIA money transfer machine, similar to a MoneyGram or Western Union money transfer machine. SA Nutter testified that it was not uncommon for Huff to call the locations (such as CVS) that she was going to wire money to Jamaica from to ensure their money transfer machines were working properly.

On February 27, 2017, SA Nutter arrived at 323 Spencer Avenue to retrieve Huff's garbage from the curb. Upon SA Nutter's arrival, he spoke to the landlord, Jim Deasey, who had just finished placing the garbage for the apartment complex on the curb. Deasey identified 2 black garbage bags that were trash from Huff's apartment and SA Nutter retrieved these bags to sort through Huff's trash to look for evidence of her ongoing involvement with the Jamaican scam.

Receipts of wired money were recovered from Huff's trash and identified as follows:

- (1) MoneyGram Receipt dated 02/08/2017 sending \$1900.00 US DOLLARS to JAMAICA to be received by HASBOURNE FERGUSON
- (1) MoneyGram Receipt from CVS Pharmacy dated 02/09/2017 sending \$1939.00 US DOLLARS (Sending to unknown location and receiver)
- (1) RIA Money Transfer Receipt dated 02/13/2017 indicating that AUDREY HUFF was the receiver of \$900.00 US DOLLARS (From an unknown sender in California)
- (1) MoneyGram Receipt dated 02/13/2017 sending unknown amount of US DOLLARS to JAMAICA to be received by KALIEFA MORRISON (Receipt is torn and missing information)

MONEYGRAM

MoneyGram records from July 14, 2014, through December 2, 2016, showed the following transactions for Audrey Huff sending money to Jamaica:

- Transactions: 293
- Average Amount Sent: \$1,008.29
- Minimum Amount Sent: \$20.00
- Maximum Amount Sent: \$2,620.00
- Total Sent: \$295,429.31

ARREST OF DONOVAN WALLACE

An 85-year-old Harrison, NY woman called police after a phone scammer had bilked her out of thousands of dollars in May of 2016. Then she and detectives pulled off some tricks of their own to catch a man accused of running the scheme from Maine.



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Harrison detectives traveled to Falmouth, Maine, where they arrested Donovan Wallace on May 28, 2016 and charged him with felony counts of third-degree grand larceny and attempted third-degree grand larceny, as well as two misdemeanor counts of fifth-degree. Wallace conned the woman out of \$23,900, police said. Wallace who is linked to similar scams along the East Coast and has been sending the money to a ringleader that Wallace identified as Kristoff Cain et al in Jamaica. The scam started May 18 2016, when the woman received a call from someone claiming to represent a credit card company who told her that there were some large charges on her account.

The caller then transferred the woman to a man who identified himself as "Trooper Philips," who told her that he was investigating a problem at Chase Bank and needed her help to determine who was involved.

"Trooper Philips" told the woman that she needed to withdraw \$23,900 from her account and send that amount in cash via FedEx to an address in Portland, Maine, and that she would be reimbursed later.

The woman complied, believing she was helping federal investigators, and sent \$23,900 to a Marriott hotel in Portland where a man picked up the money.

On May 20, 2016 the woman called "Trooper Philips" to ask about getting reimbursed, and he told her that they were still working on the case.

She then realized she had been scammed and called Harrison, NY police. The next day, Harrison, NY detectives traveled to the Portland, ME Marriott, where staff provided a description of the man who had picked up the cash.

Detectives then hatched a plan to set up "Trooper Philips."

The victim, in cooperation with the police, called the phony trooper and told him she could send him more cash to help his investigation. Wallace took the bait, and told the woman to send more cash to a location in Falmouth, Maine.

On May 28, 2016 Wallace, who had been living in Falmouth, picked up the package and was arrested by Harrison, NY police with the help of Falmouth, ME police. Wallace was also the one who had picked up the shipment of cash in Portland.

Wallace identified Kristoff Cain as the voice of "Trooper Phillips" and made multiple consensual recorded phone calls to Kristoff Cain as part of the investigation.

INTERVIEW OF DONOVAN WALLACE

On 14-June-2017, PA Office of Attorney General Agents Timothy Nutter, John Piasecki, and Postal Inspector Angie Lane arrived at the Immigration and Customs Enforcement office on Varick Street in New York City. Agents had made previous arrangements with HSI Agent Samaroo to conduct an interview of Donovan Wallace, who was currently in ICE custody.

Agents were directed to a meeting area where they met Donovan Wallace and introduced themselves. Agent Nutter advised Mr. Wallace that they wished to speak with him regarding his knowledge of and connection to Kristoff Cain. Mr. Wallace stated that he was willing to speak with Agents.

Agent Nutter advised Mr. Wallace of his Miranda Rights, utilizing IS Form 1067 Warning and Waiver of Rights. Mr. Wallace stated that he understood these rights and agreed to waive these rights at 10:07am, as is documented on the signed IS Form 1067.

Mr. Wallace advised Agents that he was a 29-year-old, bisexual male who was born and raised in Saint Ann Parish in Jamaica. His date of birth is October 22, 1987.

Mr. Wallace explained that he met Kristoff Cain at Ferncourt High School in Jamaica approximately 8 years ago. Cain was around 16 or 17 years old at the time, and Mr. Wallace had been doing volunteer work at the school. Cain dropped out of high school before finishing and moved to Kingston, where he is believed to still currently reside. Cain grew up in the Bretnunt Hill Community of Saint Ann Parish, which is where his parents are still believed to reside.

Mr. Wallace advised Agents that he is willing to cooperate in any investigation and explained that he is seeking asylum in the U.S. because he fears for his safety if he is returned back to Jamaica. Mr. Wallace explained that he had placed a recorded phone call to Kristoff Cain at the direction of Harrison, New York Police Detectives and he believes Cain could hear the officers providing directions. As such, Cain disconnected the phone call. Mr. Wallace has since learned that Cain began posting conversations on social media between Mr. Wallace and other men as a way of outing his sexuality. Mr. Wallace explained that his sexuality is very frowned upon in his country and that men are often killed for being bisexual in Jamaica. He now fears that



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either Cain will kill him for cooperating or that he will be killed because his sexuality is now public knowledge.

Mr. Wallace stated that he has not had contact with Cain since the recorded phone call with Detectives, but that his friend, Wendy Ann Steer, has attempted to learn more about Cain since Mr. Wallace's incarceration. Mr. Wallace learned through Wendy that Cain had been planning to open a clothing store in Saint Ann Parish, but that it never happened. Cain either deleted his Facebook account or has Mr. Wallace blocked.

Mr. Wallace insisted that he is not a part of the scamming, but told Agents he has an idea how it all works. Mr. Wallace figured that Cain was running scams since he knew Cain to have grown up poor, dropped out of high school, but was now living a lavish lifestyle and driving a BMW X6. Mr. Wallace explained that he was in New York City in January 2016 for a work-study program when he rediscovered Cain on Facebook and saw how rich he appeared to be. The two reconnected and began communicating through Facebook and the Whatsapp messenger service. Mr. Wallace stated that he traveled back to Jamaican in February 2016, during which time he met up with Cain in Kingston, and it became somewhat apparent that Cain must be scamming people.

Mr. Wallace told Agents that he traveled back to Maine in May 2016 to visit with his former bosses and that he had documented his travels on social media. He stated that Cain reached out to him and asked if he'd be willing to pick up a package for Cain since he was in America. Mr. Wallace did not think too much into it and assumed it was products for Cain's clothing stores. Cain advised Mr. Wallace that the package was going to be sent to a hotel. Mr. Wallace retrieved this package (known to investigators to be a package from victim Carolyn Santoro of Harrison, New York). Mr. Wallace stated that he opened the package and realized it was money. Cain instructed Mr. Wallace to wire the funds in \$1,990 increments to Omar Ricketts. He estimated sending 4 or 5 wire transfers to Ricketts in Jamaica in these amounts. Cain then flew to New York City and met Mr. Wallace for the remaining amount. Mr. Wallace recalled being paid about \$1,000 by Cain during this visit. Mr. Wallace also noted that he had been blocked from sending money by MoneyGram because of scamming complaints.

Mr. Wallace described Cain as being corrupt and having a lot of money in Jamaica. He stated that Cain scams people over and over and that he's been doing this since he was in high school. He described to Agents that the scammers will compete on the internet over who can post pictures of the most cash or the nicest cars. They have contests to see who will burn the most cash and they wash their cars with Hennessy. He also stated that these scammers build and live in mansions. Cain, in particular, posts a lot about his wealth and expensive cars on social media, despite not having a job beyond owning a few clothing stores. Mr. Wallace stated that many of the scammers own and operate the MoneyGram and Western Union stores in Jamaica, albeit sometimes "silently." He also believed that Cain knew employees of these stores and would direct his people to pick up money from the employees he knew.

Mr. Wallace reported that Cain's main competitor is a male referred to as "Bimmakid." He explained that the Jamaican culture believes that BMW vehicles are a status symbol and refers to them as "bimmas," which is how this male derived his name. He stated that Bimmakid always has the latest model BMWs. Later in the interview, Mr. Wallace explained that Cain became the top scammer in Jamaica after the murder of a scammer named "Bebe." Now, Bimmakid competes with Cain for the top spot. Wallace positively identified Bimmakid from photos posted on Bimmakid's Facebook page <https://www.facebook.com/bimmakidd>.

When asked what he knew about victim lists, Mr. Wallace stated that he knew a male named Xavier James would get lists of names and phone numbers, although he is unsure where this information was generated from. Mr. James was stabbed to death in 2014 and Mr. Wallace was unsure who was responsible for generating victim lists at present time.

Mr. Wallace stated that scammers use the Magic Jack app to place phone calls to victims in the United States. He stated that Cain has called him from Nevada and New York area codes while Mr. Wallace knew Cain to be physically located in Jamaica.

Mr. Wallace advised Agents that Harrison PD Detectives played for him a recording of a phone call between a victim and a male identifying himself as "Trooper Phillips." Mr. Wallace stated that he recognized the voice of "Trooper Phillips" on the recorded call to be Kristoff Cain.

When asked if anyone has ever wired money to Mr. Wallace, he initially told Agents that he has only received money in nominal amounts from two of his friends, Tonya White Williams and Mobita Campbell. Ms. Williams is the daughter of Valerie White, whom Mr. Wallace used to live with in Jamaica after his mother was killed. Mobita Campbell now resides in New York. He advised that the father of Mobita's children, Christopher Pearson, was shot by a police officer in Jamaica about 3 or 4 weeks ago.



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According to Mr. Wallace, the officer was jealous that Mr. Pearson was conversing with his girlfriend and an altercation ensued.

Mr. Wallace denies ever speaking to any victims on the phone or being involved in the actual scamming of any individuals. He stated that he only picked up 3 money packages on behalf of Cain. Mr. Wallace initially stated that the first time was in April 2016 when he was in Ft. Lauderdale to pick up items for a pageant he hosts in Jamaica. Mr. Wallace was staying at a hotel and Cain asked him to receive a package. When the parcel arrived, which Mr. Wallace believed was delivered either UPS or FedEx, contained cash taped into magazine pages and wrapped in towels. Mr. Wallace claimed that he told Cain he did not want involved with this type of conduct but that Cain threatened him. He stated that Cain instructed him to wire the money through MoneyGram to Omar Ricketts. Mr. Wallace vaguely recalled wiring some of the funds to a female name, but he was unable to recall the name during the interview.

Mr. Wallace stated that the second time he picked up a cash parcel for Cain was at a hotel in Maine. (This parcel is known to Agents to be the initial Carolyn Santoro parcel). The third and final parcel he picked up for Cain was the one he was in possession of at the time of his arrest.

Mr. Wallace told Agents that he has 3 bank accounts: a Scotiabank account in Jamaica, a Bank of America account which was opened in 2014, and a Wells Fargo account which was opened in 2016.

When questioned about the name "Kemoy Watkins," Mr. Wallace told Agents that the name did not ring a bell. He was then shown a photograph of Kemoy Watkins and he still stated that he did not know the person. Mr. Wallace initially stated that he did not recognize the name Kemar Logan, but later told Agents that he knew both the name and photograph of Kemar Logan to be "Fatty." Wallace positively identified Kemar Logan aka "Fatty" from his Jamaican Passport (A3549062) Photo. Logan had used this passport as identification on numerous occasions to retrieve funds from MoneyGram that Audrey Huff had wired to him in Jamaica. He believes that Fatty is from Kingston but now lives in Panama.

Mr. Wallace told Agents that he knows many of Cain's associates by their Facebook photographs, but not necessarily their names. He stated that Cain is bi-sexual and that many of his friends are males who dress as females. Mr. Wallace was read the following names, of which he knew none: Peter, Shanice Lewis, Hasbourne Ferguson, Denille, DeAngelo, Marlin, James Glasgow, Audrey Huff, Patrick Williams, and Damian Williams. Kimberly Thomas somewhat rang a bell but he couldn't recall if it was a name he had wired money to at the direction of Cain.

Mr. Wallace stated that he never knew Cain to live in Florida and was unsure if he has ever visited Florida. Most of his Facebook photos were in the New York region. Cain does possess a valid visa, which allows him to travel into the U.S.

Mr. Wallace was adamant that he never spoke directly with any victims and he never perpetuated any scams. When asked about his contacts with the Prime Minister and whether he donated any proceeds from the scams, Mr. Wallace stated that the Prime Minister has never received any funds from him and that he really never had any extra funds to be able to make donations.

Mr. Wallace told Agents that he supports the Jamaican Labor Party, a Jamaican political party which he likened to the Republican party in the U.S. He explained that it is easy to get close to the politicians, especially when they are on the campaign trails. He also stated that a member of Parliament, Shahine Robinson, lived ten minutes from him and he received a personal invite through her.

Mr. Wallace told Agents, "Cain used me," although he did admit that he received money for the parcels he picked up. Cain stated that he received \$1,000 for retrieving the second parcel, but he was unable to recall how much he was paid for the first parcel and how much he would've received for the third parcel. Cain also used Mr. Wallace's Bank of America and Wells Fargo accounts to purchase products for his clothing store.

Mr. Wallace advised Agents that the lottery scams were prominent back in the day, but now the scammers use a variety of tactics to get victims to send money because so few of them fall for the lottery pitch now.

At this point in the interview, Agents asked Mr. Wallace if there was anything else he wished to add or clarify to the points he had provided up to that point. Mr. Wallace advised that he did have some more details to offer in regard to some topics.

Mr. Wallace explained that he was dating a male named Dwayne Davis in September of 2015. Someone had borrowed Dwayne's phone and discovered personal messages between he and Mr. Wallace. This person posted photos of these conversations online to prove that Mr. Wallace was a gay male. As such, Mr. Wallace feared for his life when he returned to Jamaica because being homosexual is highly frowned upon in their culture. Around December 2016, Mr. Wallace returned to



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Florida. He reconnected with Cain on Facebook and they exchanged phone numbers. He and Cain conversed about how Mr. Wallace's friend, Tonya, had maxed out his credit cards. That's when Cain told Mr. Wallace that Wells Fargo was the best bank to do business with because you don't need any cash to open an account. Mr. Wallace ultimately opened an account with them.

Cain told Mr. Wallace that he was going to have someone put money into his account and then Mr. Wallace could send it to him. Cain told him he wasn't able to get the money directly to Jamaica. Mr. Wallace figured this money was related to a scam, but Cain never directly said it was. They never discussed the source of the funds. Mr. Wallace recalled the amount being \$8,000 or \$9,000 and that he was instructed to wire it to Omar Ricketts in \$1,990 increments. Mr. Wallace did receive some money for the transactions, but he was unable to recall the amount. He stated that he did not converse with Cain for two weeks after this because he felt uncomfortable about it.

Mr. Wallace returned to St. Ann Parish in February 2016, around election time, and was assisting in the Jamaican Labor party campaigning. He and Cain spoke over the phone during this time, but did not meet in person until late February or March 2016. At that time, Cain borrowed his Bank of America card. Mr. Wallace met Cain and Omar Ricketts at a KFC in Jamaica and gave him the card. Cain stated that he needed an American card to make purchases for his store. Cain stated that his sister would put money into the account to pay for the items they ordered.

In April 2016, Mr. Wallace traveled to Florida to pick up items for a pageant he was hosting. This would be the trip that he received the first package for Cain. Mr. Wallace maintained that he only received three packages and that he was arrested with the third one.

Mr. Wallace told Agents that Cain took Omar Ricketts under his wing to train him in scamming. "Fatty," known to Agents as Kemar Logan, trained Cain in scamming but now lives in Panama. According to Mr. Wallace, a male named "Bebe" used to be the top scammer in Jamaica but he was killed in Montego Bay not long ago. Cain and "Bimmakid" now compete for the top spot in scamming. "Fatty" is the top scammer in Panama. Two female employees who work in Cain's stores also receive money for him, but Mr. Wallace did not know their names. A younger male named Nick is Cain's right hand man and resides with him, but they are not a couple. Mr. Wallace stated that Cain's boyfriend has gang affiliations and goes by the nickname "Gun Man" and is possibly named Sheldon.

Mr. Wallace provided Agents with permission to access his Facebook account in an attempt to identify some of the people he was referring to. He provided the following username and password:

Donovan_dw@yahoo.com
donovan4726911

Mr. Wallace stated that Cain's high school Facebook account is under the name Kristoff Adonis Cain. Mr. Wallace also noted that his ex-boyfriend, Asset Allen, knows many of these scammers and may have associated with them on social media.

Mr. Wallace stated that Cain and "Bimmakid" will park on opposite sides of the Kingston Limelight Shopping Complex on Friday and Saturday nights and try to pick up boys. This is how they recruit males for their scamming. Mr. Wallace stated that Cain is very open about his lifestyle, throws lavish gay parties, and pays the gangs to provide him protection since the country is homophobic. Cain also bribes the cops. Mr. Wallace stated that he assumes the JOLT task force members accept bribes since they never actually go after these scammers, despite the scammers living "flashy" lives. Cain has even asked Mr. Wallace if he has political connections. Mr. Wallace assumes Cain wanted to exploit these connections.

Mr. Wallace stated that the last time he saw Cain was at a Hilton in Times Square. The two met up to exchange money and began to argue when Cain stated that he did not want any further involved in the scamming. Mr. Wallace left the hotel, rented another hotel room in New York, and then returned to Maine the next day.

At this point, Agents played several tapes of recorded phone conversations. Mr. Wallace positively identified the male voice of the person claiming to be Trooper Phillips and threatening victim Andrew Hutchinson as the voice of Kristoff Cain. Mr. Wallace also positively identified the male voice of the person claiming to be Patrick Williams and telling Audrey Huff to wire money to Jamaica as the voice of Kristoff Cain. Mr. Wallace stated that he never knew Cain to use the Patrick Williams, although he had heard the name of Trooper Phillips when he was arrested for picking up the money parcel.

When reviewing other photographs of suspects, Mr. Wallace stated that it is somewhat difficult for him to recognize people since most of the men in that circle dress in drag and bleach their skin. He reported that Cain's drag name is Kristina.



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He advised Agents that scammer's pay for a list of victims and that the competition is high amongst scammers because they are often working off the same victim list. Mr. Wallace stated that the scammers typically only target American victims. He then stated that scammers hide their proceeds in bank accounts under different names and in different countries, such as Panama. The interview concluded at 1:10pm and Mr. Wallace reviewed the notes Inspector Lane had taken during the course of the interview. He agreed that the notes accurately reflected his statements and provided his signature as verification of such.

IDENTIFICATION OF KRISTOFF CAIN

Agents accessed Kristoff Cain's Facebook page (Previously provided to the PA OAG by HSI) <https://www.facebook.com/search/top/?q=sretko%20anandi%20djordjevic> (Sretko Anandi Djordjevic). Mr. Wallace positively identified this as Kristoff Cain's Facebook Page. He also positively identified Kristoff Cain from the many photos attached and posted to this Facebook page. In addition to making consensual phone calls to Kristoff Cain while in custody of the Harrison, NY police, Mr. Wallace was asked to listen to recorded phone calls of Audrey Huff with "Patrick Williams" and of Andrew Hutchinson, the 82 year old victim from South Carolina with "Trooper Phillips". Donovan Wallace positively identified the voice of the person in both of these calls as Kristoff Cain. Further, Donovan Wallace testified in front of the PA Investigating Grand Jury regarding Kristoff Cain. Donovan Wallace positively identified Kristoff Cain by voice and by photograph as the individual who directed his participation in the scamming in Harrison, NY.

I, TIMOTHY NUTTER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

(Signature of Affiant)

Sworn to me and subscribed before me this 20 day of APR, 2018

4-20-18 Date [Signature], Magisterial District Judge

My commission expires first Monday of January,
RICHARD G. KING,
MAGISTERIAL DISTRICT JUDGE
MAGISTERIAL DISTRICT 05-3-14
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2024

