

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

**CRIMINAL COMPLAINT**

v.

**UNDER SEAL**

ARTHUR J. WILLIAMS III

CASE NUMBER:

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: On or about June 23, 2009, at Chicago, in the Northern District of Illinois, Eastern Division ARTHUR J. WILLIAMS III defendant herein:

sold, exchanged, transferred, and delivered a false, forged, and counterfeited obligation or other security of the United States, namely, approximately ten counterfeit \$100 United States Federal Reserve notes, with the intent that the same be passed, published, or used as true and genuine;

in violation of Title 18, United States Code, Section 473. I further state that I am a Special Agent with the United States Secret Service, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

\_\_\_\_\_  
Signature of Complainant  
TOBEY PORTER  
Special Agent, United States Secret Service

Sworn to before me and subscribed in my presence,

June 26, 2009 at Chicago, Illinois  
Date City and State

MARTIN C. ASHMAN, U.S. Magistrate Judge  
Name & Title of Judicial Officer

\_\_\_\_\_  
Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

UNDER SEAL

I, Tobey Porter, being first duly sworn on oath, depose and state as follows:

I. INTRODUCTION

1. I am a federal law enforcement officer employed as a Special Agent of the United States Secret Service. I have been employed by the Secret Service since April, 2007. I am currently assigned to the Counterfeit Currency squad of the Chicago Field Office. As part of my regular duties, I have participated in numerous investigations, arrests, and search warrants involving counterfeit United States currency, which have included violations of Title 18, United States Code, Sections 471, 472, 473, and 474.
2. The information set forth in this Affidavit is based upon my personal knowledge, information provided to me by other law enforcement officers and agents who participated in the investigation, and my review of certain public filings and law enforcement records relating to this investigation. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense charged in the complaint.
3. The information set forth in this Affidavit is based upon my personal knowledge, information provided to me by other law enforcement officers and agents who participated in this investigation, and my review of certain public filings and law enforcement records relating to this investigation. Because this affidavit is being submitted for the limited purpose of support a criminal complaint and an arrest warrant, I

have not included every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense charged in the complaint.

## II. CONFIDENTIAL INFORMANT'S PURCHASES OF COUNTERFEIT MONEY FROM DEFENDANT

4. On May 21, 2009, a Confidential Informant (CI) contacted the United States Secret Service with information regarding counterfeit currency.<sup>1</sup> The CI stated that he/she had been purchasing counterfeit \$100 bills from an individual named ARTHUR J. WILLIAMS III (WILLIAMS III) weekly for approximately two months. The CI stated that WILLIAMS III sold each counterfeit \$100 bill for \$20 in genuine currency. The CI identified a known photograph (WILLIAMS III's driver's license photo) as WILLIAMS III, and agreed to cooperate with the Secret Service in this investigation.
5. The CI stated that he/she had in the past called WILLIAMS III directly at 773-290-4628 to purchase counterfeit \$100 bills. A law enforcement database revealed that this telephone number is registered to WILLIAMS III with the service provider T-Mobile.
6. As described below, the CI proceeded to purchase counterfeit money from WILLIAMS III on three separate occasions.

### June 16, 2009 Purchase

7. On June 16, 2009, the CI placed a consensually recorded telephone call to telephone number 773-290-4628. After the call, the CI identified WILLIAMS III as the male who

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<sup>1</sup> The CI is a minor who has one ordinance violation and no criminal convictions. The United States Secret Service has paid him/her a total of \$300 for the information he/she has provided in this investigation. The United States Attorney's Office has provided the CI an immunity letter granted him immunity from prosecution based on information he provides to the government during the course of this investigation.

answered the call. During this conversation, the CI asked WILLIAMS III, "Do you got any of them." WILLIAMS III replied, "Yes." The CI then asked "How many?" WILLIAMS III replied, "24." The CI then asked, "How much you want for all of them?" WILLIAMS III replied, "\$480."

8. On June 16, 2009, a Secret Service Agent searched the CI for any contraband or counterfeit bills prior to his/her meeting with WILLIAMS III. No contraband was located during the search. A digital audio recorder was placed on the CI and he was provided with \$480 for the purchase. The CI and an undercover agent then drove to Wentworth Park, Chicago, IL and parked their vehicle. A white male arrived at the park in a 1997 white Chevrolet Blazer with Illinois license plate X153195 (hereinafter referred to as "the Blazer"). The undercover agent was able to see the white male and identified him as WILLIAMS III, based on a known photograph from a record of WILLIAMS III's driver's license. When WILLIAMS III arrived, the CI exited the undercover agent's vehicle and approached WILLIAMS III's Blazer. After a few minutes, the CI returned to the undercover agent's vehicle. WILLIAMS III then departed. The undercover agent never lost sight of the CI. The CI told the undercover agent that WILLIAMS had given the CI twenty-four counterfeit \$100 bills and the CI had given WILLIAMS III \$480 in genuine currency.
9. Immediately following the transaction, the CI met with Secret Service Agents. The CI was driven to this meeting by the undercover agent who accompanied him to this meeting. The CI gave the Agents the twenty-four counterfeit \$100 bills that WILLIAMS III sold to him/her. The Agents searched the CI and found no contraband or additional counterfeit. The Agents examined the bills, and based on their training and experience as

Secret Service Agents, confirmed the notes to be counterfeit. The counterfeit bills purchased during the operation on June 16, 2009 are described as follows:

Eight counterfeit \$100 bills, Serial Number: DA25823525B

Eight counterfeit \$100 bills, Serial Number: AB54323435B

Eight counterfeit \$100 bills, Serial Number: AD25423425B

10. On June 16, 2009, I conducted a query of the United States Secret Service Counterfeit Contraband System regarding the activity of people passing counterfeit \$100 bills bearing the aforementioned serial numbers. Counterfeit bills with these same serial numbers have been passed in Illinois, Indiana, Colorado, Maryland, Washington, Michigan, Florida, Minnesota, Georgia, New York, Rhode Island, Delaware, and Arizona, totaling approximately \$17,100, between the dates of May 5, 2008 and June 16, 2009.

#### June 17, 2009 Purchase

11. On June 16, 2009, the CI related to Secret Service Agents that WILLIAMS III contacted the CI by telephone after the above-described transaction and agreed to sell the CI \$3000 in counterfeit \$100 bills in exchange for \$600 in genuine currency. WILLIAMS III and the CI agreed to meet on June 17, 2009. This call was not recorded because it occurred late at night when the CI was out of the presence of Secret Service Agents.
12. On June 17, 2009, a Secret Service Agent searched the CI for any contraband or counterfeit bills prior to his/her meeting with WILLIAMS III. No contraband was located during the search. A digital audio recorder was placed on the CI and he was provided with \$600 for the purchase. The CI and an undercover agent then drove to a park in Wentworth, Chicago, IL and parked their vehicle. A white male arrived at the park driving the Blazer. The undercover agent was able to see the white male and identified him as the same individual

from the June 16, 2009 purchase, namely WILLIAMS III. When WILLIAMS III arrived, the CI exited the undercover agent's vehicle and approached WILLIAMS III's Blazer. After a few minutes, the CI returned to the undercover agent's vehicle. WILLIAMS III then departed. The undercover agent never lost sight of the CI. The CI told the undercover agent that WILLIAMS had given the CI thirty counterfeit \$100 bills and the CI had given WILLIAMS III \$600 in genuine currency.

13. Immediately following the transaction, the CI met with Secret Service Agents. The CI was driven to this meeting by the undercover agent who accompanied him to this meeting. The CI gave the Agents the thirty counterfeit \$100 bills that WILLIAMS III sold to him/her. The Agents searched the CI and found no contraband or additional counterfeit. The Agents examined the bills, and based on their training and experience as Secret Service Agents, confirmed the notes to be counterfeit. The counterfeit bills purchased during the operation on June 17, 2009 are described as follows:

Ten counterfeit \$100 bills, Serial Number: AD31423425B

Ten counterfeit \$100 bills, Serial Number: DA11823425B

Ten counterfeit \$100 bills, Serial Number: AB34323435B

14. On June 17, 2009, I conducted a query of the United States Secret Service Counterfeit Contraband System regarding the activity of people passing counterfeit \$100 bills bearing the aforementioned serial numbers. Counterfeit bills with these same serial numbers have been passed in Illinois, Indiana, Minnesota, Iowa, Wisconsin, Georgia, California, Nevada, Washington D.C., Texas, Florida, Washington, and Arizona, totaling approximately \$44,400, between the dates of April 8, 2008, and June 17, 2009.

June 23, 2009 Purchase

15. On June 23, 2009, the CI placed a consensually recorded telephone call to telephone number 773-290-4628. After the call, the CI identified WILLIAMS III as the male who answered the call. During the conversation, WILLIAMS III told the CI "I got ten of them." The CI agreed to purchase the counterfeit and the CI and WILLIAMS III agreed to meet later that day.
16. At approximately 12:02 p.m. on June 23, 2009, the CI placed another consensually recorded telephone call to telephone number 773-290-4628. After the call, the CI identified WILLIAMS III as the male who answered the call. During this conversation, WILLIAMS III stated, "I just finished up with them." At approximately 1:13 p.m., law enforcement agents conducting surveillance observed WILLIAMS III depart his residence and proceed directly to a meeting with the CI, as described below.
17. On June 23, 2009, a Secret Service Agent searched the CI for any contraband or counterfeit bills prior to his/her meeting with WILLIAMS III. No contraband was located during the search. A digital audio recorder was placed on the CI and he was provided with \$200 for the purchase. The CI and an undercover agent then drove to Wentworth Park, Chicago, IL and parked their vehicle. A white male arrived at the park driving the Blazer. The undercover agent was able to see the white male and identified him as the same individual from the June 16, 2009 and June 17, 2009 buys, namely WILLIAMS III. When WILLIAMS III arrived, the CI exited the undercover agent's vehicle and approached WILLIAMS III's Blazer. After a few minutes, the CI returned to the undercover agent's vehicle. WILLIAMS III then departed. The undercover agent never lost sight of the CI. The CI told the undercover agent that WILLIAMS had given the CI ten counterfeit \$100 bills and the CI had given WILLIAMS III \$200 in genuine currency.
18. Immediately following the transaction, the CI met with Secret Service Agents. The CI was

driven to this meeting by the undercover agent who accompanied him to this meeting. The CI gave the Agents the ten counterfeit \$100 bills that WILLIAMS III sold to him/her. The Agents searched the CI and found no contraband or additional counterfeit. The Agents examined the bills, and based on their training and experience as Secret Service Agents, confirmed the notes to be counterfeit. The counterfeit bills purchased during the operation on June 23, 2009, are described as follows:

One counterfeit \$100 bills, Serial Number: AD21423425B

Three counterfeit \$100 bills, Serial Number: AD31423425B

Three counterfeit \$100 bills, Serial Number: DA11823425B

Three counterfeit \$100 bills, Serial Number: AB34323435B

19. On June 23, 2009, I conducted a query of the United States Secret Service Counterfeit Contraband System regarding the activity of people passing counterfeit \$100 bills bearing the aforementioned serial numbers. Counterfeit bills with these same serial numbers have been passed in Illinois, Indiana, Delaware, Nevada, California, Wisconsin, Georgia, Minnesota, Iowa, Washington D.C., Florida, Texas, and Washington totaling approximately \$51,400, between the dates of April 8, 2009 and June 17, 2009.

#### CONCLUSION

20. Based on the foregoing information, I believe that there is probable cause to believe that ARTHUR J. WILLIAMS III has violated Title 18, United States Code, Section 473.

FURTHER AFFIANT SAYETH NOT.

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Tobey Porter



Special Agent, United States Secret Service

Subscribed and sworn  
before me this 26th day of June, 2009

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Honorable Martin C. Ashman  
United States Magistrate Judge