

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio



United States of America
v.
NATHANIEL LEE
LORI BETH TURNER
NINO ARMANDO VALDES
WILLIAM DEVIN LASSITER

Case No. 2:23-mj-268

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 02/26/2023 - 04/24/2023 in the county of Washington in the Southern District of Ohio, the defendant(s) violated:

Table with 2 columns: Code Section (18 U.S.C. 371) and Offense Description (Conspiracy to Defraud the United States (regarding 18 U.S.C. 471, 472, and 473))

This criminal complaint is based on these facts:

See attached affidavit, incorporated herein by reference.

Continued on the attached sheet.

Signature of Michael J. Dodig
Complainant's signature
Michael J. Dodig, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: April 20, 2023

City and state: Columbus, OH

Signature of Kimberly A. Johnson
Kimberly A. Johnson
United States Magistrate Judge
Seal of the United States District Court Southern District of Ohio

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN OF OHIO
EASTERN DIVISION**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael J. Dodig, being first duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I have been a Special Agent with the United States Secret Service since November 22, 2021. I have completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center and the Special Agent Training Course at the United States James J. Rowley Training Center. More specifically, these programs provided training regarding the counterfeiting of Federal Reserve Notes (FRNs), financial crimes, electronic crimes, and fraud investigations. As a Special Agent, I have participated in criminal investigations involving the manufacturing, possession and uttering of counterfeit FRNs.

2. I am assigned to pursue a federal criminal investigation of Nathaniel Lee (LEE), William Lassiter (LASSITER), Nino Valdes (VALDES), Lori Turner (TURNER) and other co-conspirators. I make this affidavit in support of the filing of a criminal complaint against LEE, LASSITER, VALDES, and TURNER, and I contend there is probable cause to believe they committed acts in violation of Title 18, U.S.C., Section 371 – conspiracy to commit an offense against the United States, with respect to federal counterfeiting statutes (18 U.S.C. §§ 471–473). Because this affidavit is being submitted for the limited purpose of filing a criminal complaint, I have not included each fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to support sufficient probable cause for the requested criminal complaint.

Facts Supports Finding of Probable Cause

3. In early 2021, the United States Secret Service, working with multiple law enforcement agencies, began an investigation into criminal activity involving the manufacturing, possession, and passing of counterfeit FRNs committed by an organized group operating in the Southern District of Ohio, and other districts. Law enforcement conducted numerous interviews and a state search warrant that was executed at the Baymont Hotel located at 701 Pike Street, Room 107, Marietta, Washington County, Ohio, wherein LEE and co-defendants VALDES, TURNER, and LASSITER rented a hotel room on February 26, 2023.

4. The investigation so far has revealed the typical manner in which this group operates: 1.) a member of the conspiracy would use a liquid degreaser to remove all ink/markings from a low-denomination genuine bill (such as a one or ten dollar bill) until they were left with blank, genuine FRN paper; 2.) the conspiracy member would use a household inkjet printer to print onto the blank paper the image of a genuine, higher denomination note (such as a fifty or one hundred, referred to as the “parent note”), creating counterfeit FRNs known as “bleached bills”; 3.) a conspiracy member would then direct others to use the bleached bills to make purchases and receive change in genuine FRNs.

5. Agents of this Service have conducted interviews and seized items and store surveillance videos that show some of the activities and tactics used by LEE and his co-conspirators. Seized evidence from the execution of the search warrant at the Baymont Hotel includes, but is not limited to: an HP printer/scanner, ink cartridges, Purple Power Cleaner/Degreaser, Extreme Power Cleaner, 51 bleached bills (not yet reprinted over), and a parent note that matched several recovered bleached bills.

6. On or about January 12, 2022, a confidential source (CS) reported that an individual known to him/her as “NOOF” AKA “Nathaniel” was manufacturing a lot of counterfeit money in the greater Columbus area. The CS described LEE as a black male, approximately 38 years old, who sucks his thumb and lives in the Mount Vernon area with his grandmother.

7. The CS explained that LEE showed him/her his process of manufacturing counterfeit money at a hotel in 2019. The CS reported he/she has purchased and been provided thousands of dollars of counterfeit money from LEE and traveled outside of the State of Ohio several times to pass, or “utter,” counterfeits with LEE. It was explained that LEE has provided the CS with lots of counterfeit money, and they will typically split the proceeds three ways between LEE (the manufacturer), the CS (the utterer), and the driver, which varied. The CS explained they like to travel on weekends to locations with multiple stores and increased customer traffic. The CS explained LEE communicates through Facebook Messenger with his clients and utilizes his phone to identify new locations and stores to pass the counterfeit FRNs. The investigation has indicated that the information the CS provided is reliable. LEE has three prior federal convictions related to the counterfeiting of FRNs.

8. On or about December 08, 2022, the Whitehall Police Department was dispatched to a Speedway gas station located at 4790 E. Broad Street, Columbus, Ohio, in reference to a counterfeit \$50.00 note bearing serial number “PF42698760A” being passed. The clerk said a black male, later identified as VALDES, attempted to pass the counterfeit bill to purchase gas for his vehicle. When VALDES observed the clerk scrutinizing the security features on the bill, VALDES immediately fled without retrieving the counterfeit. Your affiant subsequently confirmed, through my knowledge of VALDES’s appearance—based upon his state driver’s license photo—that the individual depicted in the still image is VALDES.

9. On or about February 26, 2023, the Washington County Sheriff’s Office was dispatched to a Par Mar store located at 26960 State Route 7, Marietta, Ohio, in reference to a counterfeit \$100.00 note being passed. A white female, later determined to be TURNER, proceeded to the sales floor, picked out merchandise totaling \$8.57 and supplied the clerk with a counterfeit \$100.00 note bearing serial number “HJ82190743A” for payment. The clerk provided TURNER with change in the amount of \$91.43 for the fraudulent purchase. Video surveillance from the store showed a white female come into the store to complete the transaction using a counterfeit FRN. Your affiant subsequently confirmed, through my

knowledge of TURNER's appearance based upon her state driver's license photo, that the individual depicted in the surveillance video is TURNER.

10. On or about February 26, 2023, the Marietta Police Department was dispatched to a Taco Bell located at 342 Pike Street, Marietta, Ohio, in reference to a counterfeit \$100.00 note being passed. A white female, later determined to be TURNER, purchased food in the amount of \$7.95 and supplied the clerk with a counterfeit \$100.00 note bearing serial number "HJ82190743A" for payment. The clerk provided TURNER with change in the amount of \$92.05 for the fraudulent purchase. Video surveillance from the store showed a white female come into the store to complete the transaction using a counterfeit FRN. Your affiant subsequently confirmed that the individual depicted in the surveillance video is TURNER.

11. On or about February 26, 2023, the Marietta Police Department responded to Advance Auto Parts located at 220 Greene Street, Marietta, Ohio, in reference to a counterfeit \$100.00 note being passed. An unidentified person purchased a gallon of Purple Power Cleaner/Degreaser (a concentrated solution that can be used to remove all ink/markings from a bill) totaling \$12.32 and supplied the clerk with a counterfeit \$100.00 note bearing serial number "HJ82190743A" for payment. The clerk provided the unidentified person with change in the amount of \$87.68 for the fraudulent purchase. Advance Auto Parts had no surveillance cameras at their store. During the execution of the state search warrant at the Baymont Hotel 701 Pike Street, Room 107, Marietta, Washington County, Ohio on February 26, 2023, officers seized two (2) one-gallon bottles of Purple Power from room 107. Video surveillance provided by the Baymont Hotel showed a black male, later identified as LEE, carrying a one-gallon bottle of Purple Power during check-in at the Baymont Hotel. Your affiant subsequently confirmed, through my knowledge of LEE's appearance based upon his state driver's license photo, that the individual depicted in the surveillance video carrying the Purple Power is LEE.

12. On or about February 26, 2023, the Marietta Police Department was dispatched to Walmart located at 804 Pike Street, Marietta, Ohio, in reference to a counterfeit \$100.00. Subsequent investigation revealed two black males, later determined to be VALDES and LASSITER, proceeded to the sales floor, picked out merchandise totaling \$25.05, after which VALDES supplied the clerk with a counterfeit \$100.00 note bearing serial number "HJ82190743A" for payment. The clerk provided VALDES with change in the amount of \$74.95 for the fraudulent purchase. Video surveillance from the store showed two black males come into the store to complete the transaction using a counterfeit FRN. Your affiant subsequently confirmed, through my knowledge of VALDES's and LASSITER's appearance based upon their state driver's license photos, that the individuals depicted in the surveillance video are VALDES and LASSITER.

13. On or about February 26, 2023, the Marietta Police Department was dispatched to a Walmart located at 804 Pike Street, Marietta, Ohio in reference to a counterfeit \$100.00 note being passed. A white female, later determined to be Lori TURNER, proceeded to the sales floor, picked out merchandise and TURNER supplied the clerk with a counterfeit \$100.00 note bearing serial number "AB88515401C" for payment. The clerk stated TURNER attempted to purchase a sweatshirt for approximately \$17.59, with the counterfeit FRN. TURNER immediately fled the store without retrieving the counterfeit \$100 FRN when she observed the clerk scrutinizing the security features on the bill. Video surveillance from the store showed a white female come into the store to complete the transaction using a counterfeit FRN. Your affiant subsequently confirmed that the individual depicted in the surveillance video is TURNER.

14. On or about February 26, 2023, law enforcement located the white pickup truck bearing Florida registration "JKZD16," which was a vehicle LASSITER was operating at Walmart. LASSITER was interviewed and stated he had no knowledge of any counterfeit currency being passed at Par Mar or Taco Bell. LASSITER reported he was staying at the Baymont Hotel, 701 Pike Street, Marietta, Ohio with his brother, VALDES.

15. On or about February 26, 2023, Deputy Young of the Washington County Sheriff's Office and Patrolman McElroy of the Marietta Police Department responded to Baymont Hotel located at 701 Pike Street, Marietta, Ohio. Patrolman McElroy spoke with the clerk who confirmed that LASSITER was registered to room 109. While in the hallway, Patrolman McElroy observed a male exiting room 107, who identified himself as VALDES. Patrolman McElroy made contact with LASSITER in room 109, who provided law enforcement with consent to search the room for suspect TURNER. Once the search of room 109 was completed, Patrolman McElroy asked Nino VALDES who was the occupant of room 107. VALDES replied it was his friend.

16. Deputy Young and Patrolman McElroy then approached room 107, where they were greeted by LEE. Patrolman McElroy explained he was attempting to locate a white female and asked for permission to enter the room. LEE granted law enforcement permission to look for the unidentified female. Once inside room 107, Patrolman McElroy observed in plain view a plastic trash can between the two beds with "washed" \$10 bills. On the nightstand between the two beds, Patrolman McElroy observed a genuine \$100.00 bill (later identified as a parent note bearing the same serial number as the counterfeit FRN notes passed earlier the same day, "HJ82190743A"). Patrolman McElroy advised there was an additional trash can on the table with a crumpled piece of paper with the image of a \$100 bill bearing serial number "HJ82190743A" and an empty inkjet cartridge. Patrolman McElroy located the female later identified as TURNER, who fit the description of the female who passed counterfeit FRNs earlier this date.

17. On or about February 27, 2023, Detective D.A. Young of the Marietta Police Department wrote a search warrant for the Baymont Hotel, 701 Pike Street, Room 107, Marietta, Washington County, Ohio, which was signed by the Honorable Washington County Judge Timothy Williams at 0237 hours.

18. On or about February 27, 2023, Detective Young, Patrolman Moss, and Patrolman McElroy executed the state search warrant at the Baymont Hotel, 701 Pike Street, Room 107, Marietta, Washington County, Ohio. During the execution of the search warrant, law enforcement seized items utilized in the manufacturing of the counterfeit FRNs to include, but not limited to:

- Multiple ink cartridges for a color printer
- HP Color Printer/Scanner
- 18 pieces of printer paper with image of \$100 bill printed
- (51) \$10 bills that were degreased to remove all markings (still wet from the scrubbing process)
- Two containers of Purple Power Cleaner/Degreaser
- Two bleached and ripped \$10 bills (found in trash)
- One bleached/partial \$10 bill (found in toilet)
- Genuine \$100 bill (parent note is a genuine FRN bearing unique serial number, note identifiers and security features) bearing serial number “HJ82190743A”

19. On or about February 27, 2023, Detective Young interviewed LEE. After receiving *Miranda* warnings and waiving his rights, LEE provided a statement to law enforcement wherein he claimed he was awakened from his sleep after TURNER and VALDES abruptly entered his hotel room “with all this stuff,” apparently meaning bags and other personal items, to leave in his room. LEE explained he observed VALDES washing notes in room 107 but stated all the manufacturing of counterfeit FRNs occurred in room 109.

20. On or about February 27, 2023, the Marietta Police Department contacted the Vienna Police Department to report they identified suspect TURNER as a person who passed counterfeit FRNs at several merchant stores in Marietta, Ohio. It was explained that the Marietta Police Department had executed a search warrant at the Baymont Hotel. Preliminary investigation revealed TURNER uttered counterfeit FRNs at the Grand Central Mall, located at 100 Grand Central Mall, Vienna, West Virginia, 26105.

21. A review of mall security footage revealed that on or about February 26, 2023, TURNER, VALDES, and LASSITER arrived at the Grand Central Mall in a white Ford F-150 pickup truck at approximately 1404 hours. Surveillance video shows VALDES and LASSITER shadowing TURNER as

she enters several merchant stores to make purchases with the counterfeit \$100 notes bearing serial number "HJ82190743A." I reviewed the surveillance footage of these transactions and confirmed that the individual conducting the fraudulent transactions was TURNER.

22. On or about February 27, 2023, the Vienna Police Department was dispatched to The Pizza Place located in the Grand Central Mall in reference to a suspect passing a counterfeit \$100.00 note bearing serial number "HJ82190743A" on February 26, 2023. Management was able to locate the receipt (#221) which totaled \$24.83, and TURNER was provided \$75.17 in change for the fraudulent transaction. I reviewed the surveillance footage of this transaction and confirmed it was TURNER.

23. On or about February 27, 2023, Vienna Police Department responded to the Adam's Hallmark located at the Grand Central Mall in reference to a counterfeit \$100.00 note bearing serial number "HJ82190743A" being passed on February 26, 2023. Management was able to locate the receipt wherein TURNER selected merchandise that totaled \$13.38, and TURNER was provided \$87.02 in change for the fraudulent transaction. TURNER left the store and immediately met with two black males. I reviewed the surveillance footage of this transaction and confirmed it was TURNER, and I also determined that two black males visible outside the store in the surveillance video were VALDES and LASSITER.

24. On or about February 27, 2023, Vienna Police Department responded to Great American Cookies located at the Grand Central Mall in reference to a counterfeit \$100.00 note bearing serial number "HJ82190743A" being passed on February 26, 2023. Management was able to locate the receipt wherein TURNER purchased five cookies totaling \$11.13, and TURNER was provided \$88.87 in change for the fraudulent transaction. There was no surveillance footage at this location, but Great American Cookies only took in one \$100 note on this date and it bore serial number "HJ82190743A."

25. On or about February 27, 2023, Vienna Police Department responded to the Claire's located at the Grand Central Mall in reference to a counterfeit \$100.00 note bearing serial number "HJ82190743A" being passed on February 26, 2023. Management was able to locate the receipt wherein TURNER selected merchandise that totaled \$7.49, and TURNER was provided \$92.51 in change for the fraudulent

transaction. There was no surveillance footage inside of Claire's, but I was able to review surveillance footage from H&M which was located directly across from Claire's. H&M surveillance footage shows TURNER departing Claire's.

26. On or about February 27, 2023, Vienna Police Department responded to Go! Calendars and Games located at the Grand Central Mall in reference to a counterfeit \$100.00 note bearing serial number "HJ82190743A" being passed on February 26, 2023. Management was able to locate the receipt wherein TURNER selected merchandise that totaled \$9.62 and she handed \$100.62 to the clerk. TURNER was provided \$91.00 in change for the fraudulent transaction. There was no surveillance footage at Go! Calendars and Games, but the clerk who took the counterfeit note provided a written statement. Her statement described the person as an older white female, wearing a bold printed blouse. The bank provided the clerk with an image of TURNER, and the clerk positively identified TURNER as the same person who handed her the counterfeit \$100 note. In addition, the clerk stated TURNER provided an "older \$100 bill" and that was the only \$100 note Go! Calendars and Games took in on this date.

27. On or about February 27, 2023, Vienna Police Department responded to Bath and Body Works located at the Grand Central Mall in reference to an attempted pass of counterfeit \$100.00 note, on February 26, 2023. The clerk ran the \$100 note through their counterfeit detector machine, and it was determined the note was not genuine. TURNER suggested the clerk utilize a pen to detect the starch in the money, and the clerk stated they do not utilize that method. TURNER departed the store without making the purchase.

28. On or about February 27, 2023, Vienna Police Department responded to an H&M located at the Grand Central Mall in reference to a counterfeit \$100.00 note bearing serial number "HJ82190743A" being passed on February 26, 2023. Management was able to locate the receipt wherein TURNER selected merchandise that totaled \$18.17, and TURNER was provided \$81.83 in change for the fraudulent transaction. I reviewed the surveillance footage of this transaction and confirmed it was TURNER.

29. On or about February 27, 2023, Vienna Police Department responded to Rue 21 located at the Grand Central Mall in reference to a counterfeit \$100.00 note bearing serial number "HJ82190743A" being passed on February 26, 2023. Management was able to locate the receipt wherein TURNER selected merchandise that totaled \$44.93, and TURNER was provided \$55.07 in change for the fraudulent transaction. I reviewed the surveillance footage of this transaction and confirmed it was TURNER.

30. On or about February 27, 2023, Vienna Police Department responded to GameStop located at the Grand Central Mall in reference to a counterfeit \$100.00 note bearing serial number "HJ82190743A" being passed on February 26, 2023. Management was able to locate the receipt wherein TURNER selected merchandise that totaled \$73.81, and TURNER was provided \$26.19 in change for the fraudulent transaction. I reviewed the surveillance footage of this transaction and confirmed it was TURNER.

31. On or about February 27, 2023, Vienna Police Department responded to The Children's Place located at the Grand Central Mall in reference to a counterfeit \$100.00 note bearing serial number "HJ82190743A" being passed on February 26, 2023. Management was able to locate the receipt wherein TURNER selected merchandise that totaled \$19.23 and handed \$100.25 to the clerk. TURNER was provided \$81.02 in change for the fraudulent transaction. I reviewed the surveillance footage of this transaction and confirmed it was TURNER.

32. On or about March 2, 2023, Agents of this Service interviewed TURNER at the Washington County Jail regarding passing counterfeit FRNs. After receiving *Miranda* warnings and waiving her rights, TURNER provided a statement to law enforcement. TURNER admitted to making purchases at merchant stores using counterfeit \$100.00 FRNs. She claimed she was originally unaware she was using counterfeits, but after making numerous purchases at different merchant stores, she eventually realized the money was counterfeit. TURNER explained that LASSITER would drive her to the different locations and provide her with the counterfeits. TURNER stated that when she completed the

transactions from the merchant stores, she would put the change in the center console of LASSITER's rental vehicle.

33. As indicated, LEE has three prior Federal arrests and convictions for his continued involvement with the possession and manufacturing of counterfeit FRNs:

- A. On or about January 4, 2012, Nathaniel LEE was convicted in the Southern District of Ohio for violation of Title 18 U.S.C., Section 473, Dealing in Counterfeit Obligations or Securities.
- B. On or about April 13, 2015, Nathaniel LEE was convicted in the Southern District of Ohio for violation of Title 18 U.S.C., Section 371, Conspiracy to Defraud the United States, and Title 18 U.S.C., Section 473, Dealing in Counterfeit Obligations or Securities.
- C. On or about April 17, 2017, Nathaniel LEE was convicted in the Western District of Pennsylvania for violation of Title 18 U.S.C., Section 371, Conspiracy to Defraud the United States, Title 18 U.S.C., Section 472, Uttering Counterfeit Obligations or Securities.

34. On or about February 27, 2015, the West Carrollton Police Department responded to an adult entertainment club wherein a male later identified as LASSITER attempted to utter a counterfeit \$100.00 note to enter the club. LASSITER stated he traveled to West Carrollton, Ohio with his brother VALDES and two other friends. LASSITER admitted he purchased approximately \$5,000.00 in counterfeit from an unidentified black male he met at the halfway house. LASSITER advised he paid the unknown male \$.20 on the dollar for the counterfeit FRNs. A search of their person and vehicle resulted in the recovery of fourteen counterfeit \$100 FRNs taken off the person of LASSITER, five counterfeit FRNs taken off the person of VALDES, and twenty-six counterfeit \$100 FRNs taken from the center console of the vehicle they were driving. In addition, police recovered two handguns which were reported as stolen in NCIC. LASSITER was charged only with the stolen firearms in state court, wherein he was convicted of Having Weapons Under Disability and Improper Handling of Firearms in a Motor Vehicle.

35. Based on the facts presented above, I believe there is probable cause to show that Nathaniel LEE, Lori TURNER, Nino VALDES, and William LASSITER have engaged in violations of Title 18, U.S.C.,

Section 371 – conspiracy to commit an offense against the United States, with respect to federal counterfeiting statutes (18 U.S.C. §§ 471–473).

Respectfully submitted,



SA Michael J. Dodig
United States Secret Service

Subscribed and sworn to me before me
on April 20, 2023:


Kimberly A. Jolson
United States Magistrate Judge