

AO 91 (Rev. 01/09) Criminal Complaint

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA**SEALED**

UNITED STATES DISTRICT COURT

for the  
District of Nebraska

SEP 12 PM 12:55

OFFICE OF THE CLERK

United States of America  
v.

TRACEY ANN RICHTER

*Defendant*

Case No. 8:11MJ195

**CRIMINAL COMPLAINT**

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

On or about the date of 01/02/2009 in the county of \_\_\_\_\_ in the \_\_\_\_\_ District of  
Nebraska, the defendant violated 18 U. S. C. § 1542, an offense described as follows:**COUNT I**

On or about the 2nd day of January, 2009, in the District of Nebraska, the defendant, TRACEY ANN RICHTER, willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws.

In violation of Title 18, United States Code, Section 1542.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

Adam Russo, Special Agent

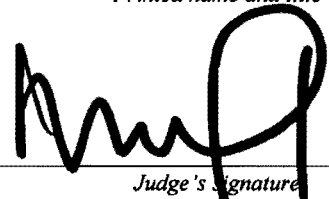
*Printed name and title*

Sworn to before me and signed in my presence.

Date:

9/12/11

City and state:

Omaha, Nebraska*Judge's signature*

U.S. MAGISTRATE JUDGE

*Printed name and title***Thomas D. Thalken**  
**U.S. Magistrate Judge**

**Affidavit In Support of a Criminal Complaint and Arrest Warrant**

I, Adam Russo, being duly sworn, depose and state:

1. I am a Special Agent with the U.S. Department of State, Diplomatic Security, currently assigned to the Chicago Field Office. I have been employed as a Special Agent since October of 2009. I completed the Diplomatic Security Training Center's Basic Special Agent Course and the Federal Law Enforcement Training Center's Criminal Investigators Training Program where I received specialized training in conducting investigations of federal offenses, including passport fraud, visa fraud, and identity fraud.

2. This affidavit is filed in support of an arrest warrant and criminal complaint charging Tracey Ann RICHTER, also known as (aka) Tracey RICHTER ROBERTS, aka Tracey RICHTER ROBERTS PITMAN, aka Sophie Corrina Terese EDWARDS with willfully and knowingly making a false statement on a passport application in violation of 18 USC §1542.

3. This affidavit is based on information obtained from law enforcement and government personnel: witness statements; my personal knowledge and observations; and my examination of various reports, documents, record, and computer databases. Unless otherwise indicated, when the contents of a documents, or an individual's statement, are reported herein, they are reported in substance and part and are not intended to be a verbatim recitation of the document or statement. Because this affidavit is being submitted for the limited purpose of establishing probable cause to support the issuance of an arrest warrant, it does not include all of the facts known to me or other government personnel.

4. According to the U.S. Department of State (DOS) passport regulations (contained at 22 CFR part 51), a passport applicant is required to submit a passport application and to truthfully answer all questions and state every material matter of fact pertaining to his or her eligibility for a passport. All information and evidence submitted in connection with a passport application is considered part of the application. Passport Acceptance Clerks must undergo mandatory ongoing training in the acceptance process of United States Passports. Acceptance Clerks are required to insure the passport photos submitted with the United States Passport application are a likeness of the applicant who is applying in front of them. The Acceptance Clerk is also required to insure the photo identification submitted with the application is a likeness of the applicant. If the photos submitted or the photo identification presented does not resemble the applicant, the application is still accepted, but referred to the passport agency's fraud division for further review.

5. According to DOS records, on 01/02/2009, an individual submitted a U.S. passport application (DS-11) #316405975 to the United States Post Office, Boystown branch, 139 S. 144<sup>th</sup> St. Omaha, NE 68154. The individual identified herself on the passport application as Sophie Corrina Terese EDWARDS; born on 05/15/1966, in Illinois. For proof of identity, the individual presented Iowa driver's license #706XX3673, issued 04/19/2005, in the name Sophie Corrina Terese Baronin EDWARDS. The applicant's signature appears below a declaration that states, in part, that the statements on the application are true and correct, the applicant has knowingly or willfully made false statements or included false documents in support of the application, and the photograph submitted with the application is a genuine and current photograph of the applicant. The passport application included a photograph. On

01/12/2011, the Charleston Passport Center (CA/PPT/CPC) mailed RICHTER a "Request for Further Information" letter and a US Dept of State "Affidavit Regarding a Change of Name" (DS-60) form, purportedly signed by Lisa ROBERTS, her former sister-in-law, to further substantiate her claim to identity. RICHTER mailed to CPC a photocopy of the Iowa driver's license #706XX3673, issued 04/19/2005, in the name Sophie Corrina Terese Baronin EDWARDS, a Wells Fargo Bank Gold Check card, issued in 2008, in the name of Sophie EDWARDS, and a Social Security card, SS#480-39-1835, issued on 12/03/2008, in the name of Sophie C. EDWARDS.

6. On 04/17/2009, Deputy John PANKONIN, Douglas County Sheriff's Office, Douglas County, Nebraska, contacted the US Diplomatic Security Service Chicago Field Office (CFO) duty agent Ryan Schiesser. PANKONIN advised Special Agent Ryan SCHIESSER that he believed RICHTER obtained two US passports issued in different names with different social security numbers (See Attachment 1). Deputy PANKONIN informed SA SCHIESSER that on 05/13/2009, the Douglas County Sheriff's Office discovered two US Passports that appeared to be issued to the same person while executing a search warrant on RICHTER's address, 1851 N. 115<sup>th</sup> Plaza #3108, Omaha, Douglas County, NE. Deputy PANKONIN stated the US Passports were issued in the names Sophie EDWARDS and Tracy RICHTER. (See attachment # 2 [page 5, items S343-8 and S343-9]).

7. SCHIESSER queried CFO databases and advised PANKONIN that RICHTER was issued at least four different US passports with two different social security numbers. RICHTER applied for, and was issued passports on 02/28/1996 (issued in the name of Tracey PITMAN, PPT#025526363, SS#334-70-6880), 02/04/1999 (issued in the name of Tracey RICHTER-ROBERTS, PPT#159646481, SS#334-70-6880), 11/16/2005 (issued in the name of Tracey RICHTER aka Tracey ROBERTS, PPT#215711750, SS#334-70-6880), and on 02/03/2009 (issued in the name of Sophie EDWARDS, PPT#453750483, SS#480-39-1835).

8. PANKONIN telephonically interviewed Liesa Marie DEVINE (incorrectly spelled "Lisa ROBERTS" on the DS-60). DEVINE, prior to marriage, was known as Liesa Marie ROBERTS. RICHTER listed DEVINE as the witness on the DS-60 form submitted with DS-11 #316405975 on 01/02/2009 in the name of Sophie Corrina Terese EDWARDS. DEVINE advised PANKONIN that she was a current resident of Australia. DEVINE advised PANKONIN that SHE traveled to the US in 09/2000 for a three week visit. DEVINE informed PANKONIN that SHE never signed affidavit regarding a name change of Tracey RICHTER to Sophie EDWARDS.

9. RICHTER is currently going through court proceedings for an unrelated first degree murder charge in Sac County, IA. RICHTER's attorney stated in the "Response to State's Resistance" that RICHTER admitted to receiving and using a US passport in the name Sophie EDWARDS (State of Iowa vs. Tracey Ann RICHTER-ROBERTS, Case No. FECR 011900, Section B. 11, See Attachment #3).

10. Based on the foregoing information, there is probable cause to believe that on or about 01/02/2009 Tracey Ann RICHTER willfully and knowingly made a false statement in an application for a passport with intent to induce or secure the issuance of a passport under the authority of the United States, either for her own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws in violation of 18 U.S.C. §1542; to wit: she represented on a passport application that her name was Sophie Corrina Terese EDWARDS, with a date of birth of 05/15/1966, and a place of birth of Illinois, when her name was Tracy Ann Richter, with a date of birth of 05/15/1966, and a place of birth of Chicago, Illinois and presented an Affidavit Regarding a Change of Name" (DS-60) that was fraudulently signed.

11. Based on the foregoing information, I respectfully request that this Honorable Court issue an arrest warrant for Tracey Ann RICHTER , also known as (aka) Tracey RICHTER ROBERTS, aka Tracey RICHTER ROBERTS PITMAN, aka Sophie Corrina Terese EDWARDS.



Adam Russo  
Special Agent  
U.S. Department of State  
Diplomatic Security Service

