

Approved: J. L. Nawaday 15 MAG 1018  
JAIMIE L. NAWADAY  
Assistant United States Attorney

Before: HONORABLE GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
Southern District of New York

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UNITED STATES OF AMERICA : SEALED  
 : COMPLAINT  
 - v. - : Violation of 18 U.S.C.  
 : § 1343  
 :  
PETER SENESE, : COUNTY OF OFFENSE:  
 : NEW YORK  
 :  
Defendant. :  
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SOUTHERN DISTRICT OF NEW YORK, ss.:

WALTER WRIGHT, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE  
(Wire Fraud)

1. From at least in or about November 2013 up to and including at least in or about February 2015 in the Southern District of New York and elsewhere, PETER SENESE, the defendant, having devised and continuing to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, or promises, did transmit and caused to be transmitted by means of wire, radio, and television communication in interstate commerce, writings, signs, signals, pictures, or sounds for the purpose of executing such scheme and artifice, to wit, SENESE defrauded victims of money by posing as an individual who could help rescue and return abducted children.

(Title 18, United States Code, Section 1343.)

The basis for my knowledge and the foregoing charge is, in part, as follows:

2. I have been a Special Agent with the FBI for approximately twenty-four years. I have also been personally involved in the investigation of this matter, and have been involved in the investigation and prosecution of numerous frauds as well as crimes against children. This affidavit is based upon my own observations, conversations with other law enforcement agents and others, and my examination of reports and records prepared by others. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### BACKGROUND TO THE INVESTIGATION

3. As set forth below, PETER SENESE, the defendant, advertises himself as the Founding Director of a "self-funded non-profit organization dedicated to preventing child abduction and trafficking" known as the "I CARE Foundation" ("I CARE"), which maintains a website at [www.stopchildabduction.org](http://www.stopchildabduction.org) and a related website at [www.petersenese.com](http://www.petersenese.com).

4. Through his websites and elsewhere, PETER SENESE, the defendant, represents that, acting through I CARE, he is "a hero for others" who has "reunited numerous internationally kidnapped children while preventing an exponentially larger number of children from abduction." SENESE also represents that "there have been many, many children of international parental child abduction who have been reunited and returned home due directly to the great efforts, financial, legal, and investigative resources of the self-funded, not for-profit I CARE Foundation that [SENESE is] the Founding Director of."

#### SENESE'S SCHEME TO DEFRAUD PARENTS OF ABDUCTED CHILDREN

5. In the course of this investigation, among other things, I have reviewed the websites associated with PETER SENESE, the defendant, interviewed victims whose children have been internationally abducted, reviewed bank records, reviewed email and text message exchanges, listened to recorded telephone calls, and reviewed cellular telephone records associated with SENESE.

6. From my review of websites associated with PETER SENESE, the defendant, I know that:

a. SENESE represents that he is the "Founding Director" of I CARE, which, he represents, is "a self-funded not-for-profit 501-C-3 corporation" that "does not accept outside financial contributions and has reunited numerous internationally kidnapped children while preventing an exponentially larger number of children from abduction."

b. SENESE represents that I CARE is "a highly skilled, heavily experienced and knowledgeable foundation composed of some of the leading figures in the world dedicated to protecting children from abduction and trafficking, while also playing a hands-on and critical role in rescuing numerous children from international kidnapping."

c. SENESE represents that "there have been many, many children of international parental child abduction who have been reunited and returned home due directly to the great efforts, financial, legal, and investigative resources of the self-funded, not -for-profit I CARE Foundation that I am the Founding Director of."

7. From my interviews with Victim-1 ("V-1"), and my review of V-1's bank records, emails, and text messages, I have learned, among other things, that:

a. On or about November 9, 2013, V-1, whose child ("Child-1") was abducted from New York, New York, and taken to India, contacted PETER SENESE, the defendant, through the I CARE website about whether I CARE could help recover Child-1 and return Child-1 to the United States. Shortly thereafter, SENESE responded and arranged to meet V-1.

b. On or about November 18, 2013, SENESE met with V-1 at a restaurant on or around East 14th Street in New York, New York, and stated that he could return Child-1 to the United States within approximately two weeks.

c. In the course of that meeting, SENESE also represented that he would be able to recover Child-1 by enlisting the assistance of an unidentified retired federal judge, unidentified teams of international lawyers, and unidentified fellow former members of the United States Army component Delta Force ("Delta Force"), to which SENESE claimed

to have belonged. SENESE also asked for approximately \$2,100 dollars in cash to cover his rescue operation expenses. Immediately after the meeting, V-1 went to a nearby financial institution, withdrew \$2,100 and gave the money to SENESE.

d. On or about November 25, 2013, SENESE appeared on a radio talk show in New York, New York with V-1 to discuss the efforts of his foundation to help recover Child-1. From listening to the broadcast, I learned that SENESE represented that he had a network of attorneys and other resources around the world to recover Child-1 and other child victims of international abduction, that I CARE is a non-profit and takes no outside money, and that he was very successful in bringing abducted children back to the United States. SENESE also represented that he was confident that V-1 and Child-1 would be reunited soon.

e. On or about November 26, 2013, SENESE asked V-1 for an additional \$5,000 cash for his rescue operation expenses. V-1 withdrew this amount from a financial institution in New York, New York, and provided it to SENESE.

f. In or about December 2013, V-1 paid SENESE an additional \$8,000 at his request for additional expenses associated with recovering Child-1.

g. Between in or about February 2014, and in or about May 2014, V-1 continued to pay SENESE, at SENESE's request, for what SENESE represented were operational expenses to recover Child-1, in amounts ranging from \$3000 to \$5000 per month.

h. In or about April of 2014, SENESE contacted V-1 by telephone and stated that his team of former Delta Force operators was on the verge of recovering Child-1 in India via Dubai, in the United Arab Emirates.

i. On or about April 25, 2014, SENESE sent a text message to V-1 stating that he was "heading to India in 17 hours."

j. On or about April 26, 2014, SENESE sent a text message to V-1 stating, in part, "We are a go go go go go. They are to pick [Child-1] up in 11 hours. I am so extremely excited. I'm quarterbacking everything right now at my end. 17 hours into Dubai, 30 hours into New York."

k. The same day, SENESE sent an email to V-1 and others stating, in part, that he would be "traveling over the next 62 [hours]" and would have limited access to messages because he would be at "a remote location."

l. From in or around April 27, 2014, to in or about April 29, 2014, SENESE continued to text V-1, stating, in part, that "[a]ll is moving along the way we expect," that "[t]hey are almost ready. One last item on [Child-1's] departure," and advising V-1 that "[cell phone] traffic must be silent or [V-1] may put at risk our team." Child-1 was not recovered at that time.

8. Based on my interviews of V-1 and my review of text messages and emails between V-1 and PETER SENESE, the defendant, I know that:

a. In or about May 2014, SENESE represented to V-1 that he was in India to recover Child-1.

b. On or about May 6, 2014, SENESE sent a text message to V-1 stating, "All is well. I wish I can share more but not from this channel. We should be airborne in 26 hours. Then 18 more into JFK. That's 44 hours from now."

c. On or about May 7, 2014, SENESE sent a text message to V-1 stating, "I'm one mile away from the package [Child-1]." The same day, SENESE sent a text stating that his return might take a few additional days because of a change in Indian law that would allow him not only to "bring home [Child-1] but somewhere between 6 and 11 other children that will be returned home within 5 weeks." Child-1 was not recovered at that time.

9. Based on my interviews of V-1 and my review of V-1's bank records, emails, and text messages, I know that:

a. On or about June 4, 2014, V-1 paid an additional \$6,000 to SENESE based on SENESE's request for funds for operational expenses.

b. On or about June 8, 2014, SENESE contacted V-1 using his cellphone and stated that he was again on the verge of recovering Child-1 in India and was in the final stages of planning the rescue operation with a team of former Delta Force operators. The same day, SENESE sent a text message to V-1 stating, in part, "[t]he team will be on the ground for 2.5

hours . . . I'm off the grid going over tactical steps now."

c. On or about June 9, 2014, SENESE sent a text message to V-1 stating, in part, "So far so good. We are waiting for the 2 individuals from the government who are traveling. They are expected to arrive in 2 hours. Then it will take 45 minutes to pick up [Child-1] and get to the airport." Child-1 was not recovered at that time.

10. Based on my interviews of V-1 and my review of V-1's bank records, emails, and text messages, I know that PETER SENESE, the defendant repeatedly represented to V-1 that two Delta Force operators were stationed in the region of India where Child-1 was held and that they were communicating with Child-1 on behalf of V-1.

a. For example, on or about July 19, 2014, SENESE sent a text message to V-1 stating, in part, that one of the operators "will be teaching [Child-1] how to ride horses. . . [and] bought [Child-1] black cowboy boots today."

b. On or about July 20, 2014, SENESE sent a text message to V-1 directing V-1 to "shoot a video of you at work and send it to me. Someone wants to see his [parent] in action. . . Explain to [Child-1] what your day was like so far today. . . As far as departure: the beginning of the week. I'm coordinating logistics. He'll see them [the Delta Force operators] tomorrow." Child-1 was not recovered at that time.

c. On or about July 28, 2014, V-1 withdrew another \$9,000 and paid the money to SENESE at his request.

d. In or about August 2014, after V-1 informed SENESE that V-1 could not afford any more payments, SENESE contacted the parents of V-1 without V-1's knowledge and asked them for money to support his efforts to return their grandchild to the United States.

11. Based on my interview of one of the parents of V-1 as well as a review of bank records, I know that between in or about August 2014 and in or about November 2014, the parents of V-1 provided approximately \$25,000 by wire transfer to PETER SENESE, the defendant.

12. Based on my interviews of V-1 and listening to recorded telephone calls between V-1 and PETER SENESE, the defendant, I know that on or about February 12, 2015, SENESE

represented to V-1 that he planned to return to India in a few weeks to recover Child-1. Child-1 has not been recovered.

13. Based on my review of cellular telephone records associated with the telephone used by PETER SENESE, the defendant, to text V-1, I know that:

a. On or about April 26, 2014, through on or about April 30, 2014, SENESE was in or around Miami, Florida.

b. On or about May 6, 2014, through on or about May 11, 2014, SENESE was in or around Miami, Florida.

c. On or about June 8, 2014, and June 9, 2014, SENESE was in or around New York, New York.

d. On or about July 19, 2014, and July 20, 2014, SENESE was in or around Ontario, California.

14. From my interviews with Victim-2 ("V-2"), whose child ("Child-2") was abducted and taken to India, and my review of bank records, emails, and text messages provided by V-2, I also know the following:

a. In or about June of 2014, V-2's attorney met PETER SENESE, the defendant, at a conference in New York, New York.

b. On or about June 17, 2014, V-2 spoke to SENESE on the telephone about Child-2. During that conversation, SENESE represented to V-2 that, through the use of his diplomatic and Delta Force connections, he could recover Child-2 in approximately a few weeks.

c. On or about June 19, 2014, SENESE sent V-2 a text stating, in part, that he arranged for the recovery of "2 children that were taken to the Philippines [who were] literally on their way home right now."

d. On or about June 26, 2014, SENESE sent V-2 a text asking for certain documents concerning Child-2 and later stated over the telephone that either he or a former United States federal judge would speak with judges in India to arrange for Child-2's return to the United States.

e. On or about June 27, 2014, SENESE met V-2 at V-2's home in Queens, New York and stated that SENESE would

bring Child-2 back to the United States on his private plane but that he would need approximately \$5,000 for his initial expenses. Immediately after the meeting, V-2 withdrew \$5,000 from a nearby financial institution and gave the money to SENESE.

f. On or about July 1, 2014, V-2 again met with SENESE regarding SENESE's efforts to return Child-2. SENESE informed V-2 that he needed an additional \$8,000 for his recovery expenses. V-2 and SENESE then drove to a nearby financial institution and V-2 obtained a cashier's check for \$8,000 but suggested that they discuss the matter further in V-2's attorney's office. SENESE declined and left without the \$8,000.

g. Later in July 2014, SENESE stopped communicating with V-2. Child-2 was not recovered.

15. From my conversations with a law enforcement agent with the United States Department of Defense ("DoD"), I understand that DoD records reflect that PETER SENESE, the defendant, has no affiliation with the United States military.

16. From my review of IRS database records, I found no registered non-profit organization matching the name and description of I CARE.

17. From my conversations with other law enforcement agents at the FBI and with the United States Department of Homeland Security, Customs and Border Patrol ("CBP"), I understand that CBP records reflect that PETER SENESE, the defendant, has not traveled outside of the United States since 2007.



WHEREFORE, I respectfully request that an arrest warrant be issued for PETER SENESE, the defendant, and that he be arrested and imprisoned or bailed, as the case may be.



WALTER WRIGHT  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
27th day of March, 2015



HONORABLE GABRIEL W. GORENSTEIN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK