UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, Plaintiff, v. $70,000.00 IN UNITED STATES CURRENCY, ONE ROLEX WATCH BEARING SERIAL NUMBER 013KL245, and ONE ROLEX WATCH BEARING SERIAL NUMBER 291063E3, SEIZED JANUARY 20, 2024, FROM A LAND ROVER DEFENDER BEARING MASSACHUSETTS REGISTRATION NUMBER 3YTW25, Defendants *in rem*.	)	Civil Action No.: 25-13423

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by its attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, in a civil action of forfeiture *in rem* pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C) and Supplemental Rule G of the Federal Rules of Civil Procedure for Admiralty or Maritime Claims and Asset Forfeiture Actions, alleges that:

NATURE OF ACTION

1. The United States of America, pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C), seeks civil forfeiture of the following property (collectively, the "Defendant Property") seized January 20, 2024, from a Land Rover Defender bearing Massachusetts registration [redacted]:

a. $70,000.00 in United States currency (the "Currency");

b. one Rolex Watch bearing serial number 013KL245; and

c. one Rolex Watch bearing serial number 291063E3

(items b and c will be referred to collectively as the "Rolex Watches").

BACKGROUND ON THE INVESTIGATION

2. This forfeiture action arises from the investigation of members of a transnational organized crime group referred to by law enforcement as the Traveling Conmen Fraud Group (the "Group"), which began in 2023. Group members are usually citizens of Ireland and the United Kingdom who conduct construction, paving, and roofing fraud schemes in the United States to defraud unsuspecting homeowners out money. The fraud usually involves Group members portraying themselves as contractors and soliciting work from homeowners. The solicitation usually starts out small, such as an offer to fix crumbling brick steps at a good price. As the work progresses, however, Group members will typically convince homeowners to agree to unnecessary, expensive projects (such as major foundation work or waterproofing). By the time the homeowner discovers the fraud, expresses displeasure with the work, or threatens to report the Group members to law enforcement, the Group members will move to another town or state.

3. Group members often work in the United States illegally, do not have contractor's licenses, do not pull permits for their work, and avoid professional inspection of their work. They also purchase Rolex watches overseas or domestically with fraud proceeds. The Rolex watches may be used as a store of value, are easily concealed when the Group members travel internationally, and can also be easily resold or traded.

4. The United States government requires international travelers to submit a currency report when they are carrying more than $10,000 in cash. Jewelry and luxury watches, however, are not subject to similar reporting requirements and can be easily transported. Law enforcement has observed persons believed to be Group members and their companions, including minor children wearing or otherwise carrying Rolex watches with them while traveling internationally.

5. Many of the victims of frauds perpetuated by Group members are elderly homeowners.

JURISDICTION AND VENUE

6. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355. Venue is proper pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395(b) because acts and omissions giving rise to the forfeiture occurred in the District of Massachusetts and because the Defendant Property was found in the District of Massachusetts.

STATUTORY AUTHORITY

7. Pursuant to 18 U.S.C. § 981(a)(1)(A), the following property is subject to civil forfeiture to the United States:

> Any property, real or personal, involved in a transaction or attempted transaction in violation of section 1956 . . . of [Title 18], or any property traceable to such property.

8. Pursuant to 18 U.S.C. § 981(a)(1)(C), the following property is subject to civil forfeiture to the United States:

> Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of . . . any offense constituting "specified unlawful activity" (as defined in section 1956(c)(7) of [Title 18]), or a conspiracy to commit such offense.

9. Pursuant to 18 U.S.C. § 1956(c)(7)(A), the term "specified unlawful activity" includes:

> any act or activity constituting an offense listed in section 1961(1) of [Title 18] except an act which is indictable under subchapter II of chapter 53 of title 31.

Among the offenses listed in 18 U.S.C. § 1961(1) is "any act which is indictable under" Title 18 "section 1343 (relating to wire fraud)".

FACTUAL ALLEGATIONS

10. As set forth below, probable cause exists to believe that the Defendant Property:

    a. constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1343 or conspiracy to commit such offense; and

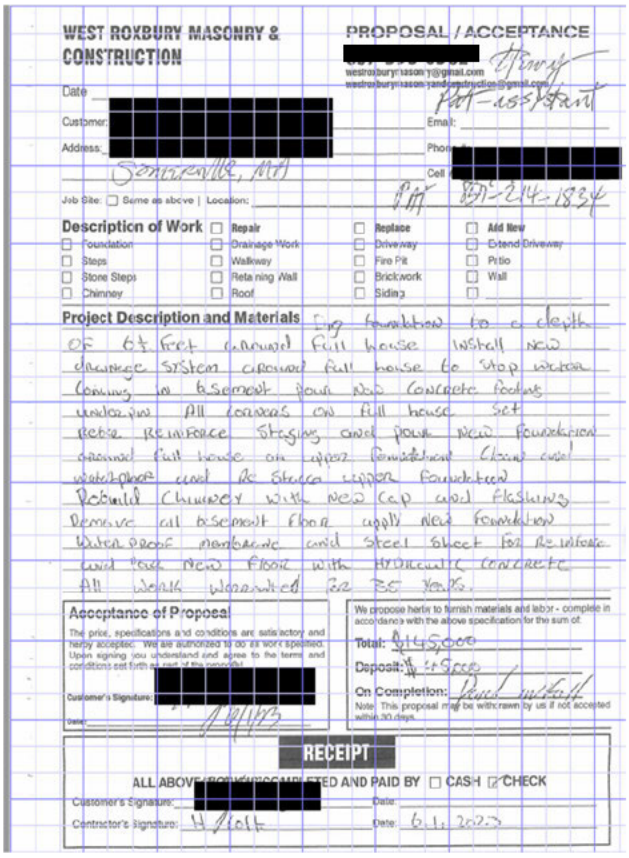
    b. was involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 or is traceable to such property.

June 2023 and July 2023: Victim 1, a homeowner in Somerville, Massachusetts wrote checks to McInerney for work performed by unlicensed contractors.

11. On January 2024 and March 2024, Homeland Security Investigations (HSI) investigators interviewed Victim 1 in Somerville, Massachusetts.

12. Victim 1 was born in 1947.

13. Victim 1 relayed that s/he received a flyer at his/her residence and produced a copy of the flyer. Victim 1 stated that two men approached him/her regarding perceived defects in his/her chimney and gave him/her an estimate. Believing that the men were legitimate contractors working for a company, Victim 1's basement as well. The men wrote up a second proposal for the basement work, quickly dug up Victim 1's basement, and showed him/her wetness on the floor.



Documents Provided by Victim 1

14. Victim 1 decided to hire the men to work on his basement and repoint his chimney. Victim 1 told agents that the men brought day laborers to perform the work, and that Victim 1 paid the men by checks, payable to Michael McInerney ("McInerney"), in June 2023 and July 2023.

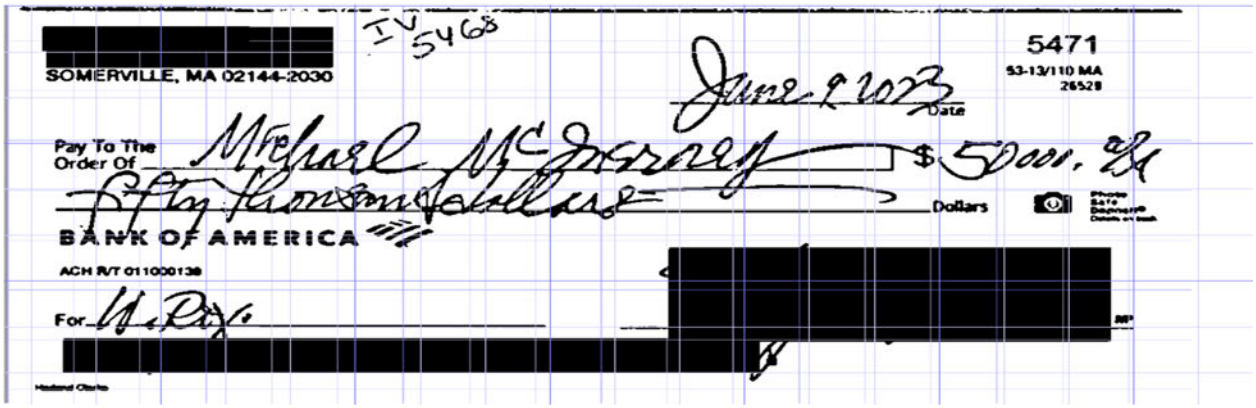
15. McInerney is a Group member.

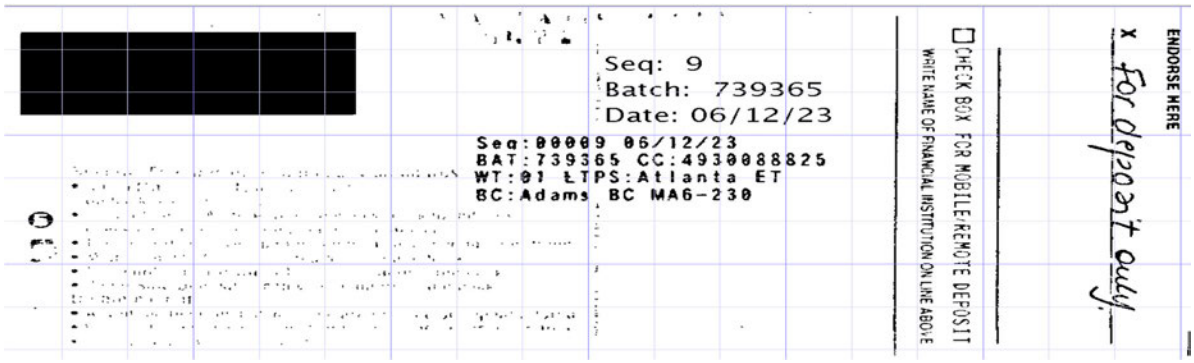
16. Victim 1 stated to investigators that the men who worked on his/her home did not complete the basement project.

17. Later, Victim 1 noticed the basement was leaking. Victim 1 tried to get in touch with the men but was not able to reach them.

18. Victim 1 stated that he/she withdrew money from a retirement account to pay for the project and that the men initially quoted $150,000 for the work before telling Victim 1 a month later that the work would cost more.

19. Between June 12, 2023, and July 12, 2023, McInerney deposited three checks from Victim 1, totaling $154,500, made out to "Michael McInerney," into his Bank of America account:


[redacted]
SOMERVILLE, MA 02144-2030
IV 5468
5471
53-13/110 MA
26528
June 2 2023
Date
Pay To The Order Of Michael McInerney $ 50000.00
Fifty thousand dollars
Dollars
BANK OF AMERICA
ACH R/T 011000138
For
[redacted]



20. In the "For" section of the checks, Victim 1 wrote "W. Rox. Masonry" and "W. Rox."

21. Neither West Roxbury Masonry nor West Roxbury Masonry and Construction are corporations registered with the Secretary of the Commonwealth of Massachusetts.[1]

22. McInerney, West Roxbury Masonry, and West Roxbury Masonry and Construction are not licensed contractors in the Commonwealth of Massachusetts.

23. Bank of America uses servers in states other than Massachusetts to process checks and does not have any servers in Massachusetts.

24. On June 5, 2023, McInerney deposited a check written out to McInerney by Victim 1 for $45,000, into a Citizens Bank account.

25. Citizens Bank processes checks using a server that is not located in Massachusetts.

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[1] A Yelp review from this time period for an entity described as "West Roxbury Masonry and Construction" read as follows:

Jun 15, 2023

Worst company ever. Shoddy work. Messed up everything and left a total mess everywhere. Took my money and ran after promising they would fix everything. Now blocking my phone calls and e-mails. DO NOT HIRE THEM!

https://www.yelp.com/biz/west-roxbury-masonry-and-construction-west-roxbury#reviews (accessed September 18, 2025).

26. Victim 1 wrote down the license plate numbers of cars driven by the workers. One car was registered to Terrence Connors, who, as described below, has been found civilly liable for construction fraud by a court in Washington, D.C.

Summer 2023: McInerney and his associate overcharged Victim 2, a homeowner in Cambridge, Massachusetts, for work that should have cost between $20,000 to $30,000.

27. On March 13, 2024, HSI investigators interviewed Victim 2, a homeowner in Cambridge, Massachusetts. Victim 2 was born in 1945.

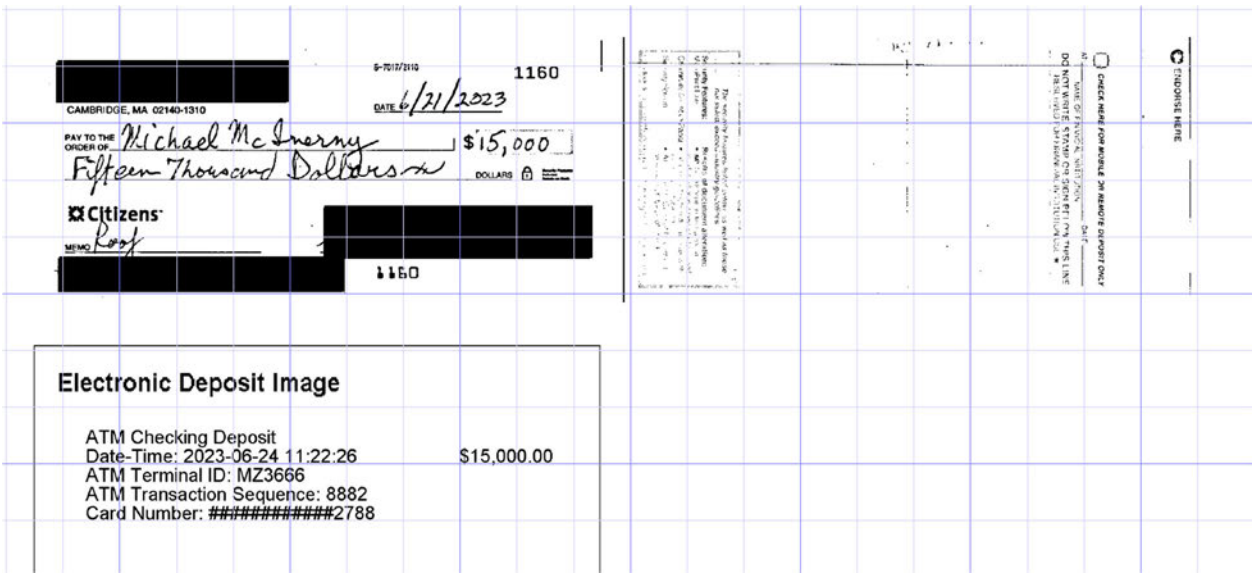
28. Victim 2 reported that, in June 2023, a man called "Charlie Brown" came to his/her home and told him/her that the roof had a leak, the wood was rotted, and he could fix it.

29. Victim 2 agreed to have the roof fixed, and a day laborer completed the work.

30. Victim 2 paid for the work by writing checks to McInerney, and his/her roof no longer leaks.

31. Victim 2 believes, and investigators agree, that the price was substantially inflated, as the work should have cost between $20,000 and $30,000.

32. McInerney deposited checks from Victim 2, totaling $86,500, into his Citizens Bank account on June 22, 24, and 28, 2023, June 24, 2023, and July 7 and 15, 2023.


[redacted]
CAMBRIDGE, MA 02140-1310
1160
DATE 6/21/2023
PAY TO THE ORDER OF Michael McInerney $15,000
Fifteen Thousand Dollars
DOLLARS
Citizens
MEMO Roof
[redacted]
1160
Electronic Deposit Image
ATM Checking Deposit
Date-Time: 2023-06-24 11:22:26 $15,000.00
ATM Terminal ID: MZ3666
ATM Transaction Sequence: 8882
Card Number: ##########2788

33. Victim 2 stated that "Charlie Brown" represented that his company was West Roxbury Masonry and Construction. As noted above, that company was not registered with the Commonwealth of Massachusetts.

34. Victim 2 stated that the day laborer came to his/her home a few months after the job was completed and appeared to not have been paid or fully compensated for his work.

July 2023: Connors induced a homeowner in Chicago, Illinois, to hire him to work on his/her home and directed the homeowner to write checks to McInerney for the work.

35. On June 13, 2024, HSI investigators interviewed Victim 3, a homeowner who lived in Chicago, Illinois.

36. Victim 3 was born in 1950.

37. Victim 3 told agents that, in July 2023, a man who identified himself as "Charlie Culter" approached Victim 3 at home in Chicago and said his chimney needed repairs. Investigators believe that "Charlie Culter" is an alias used by Connors.

38. "Charlie Culter" represented that he worked for Chicago Masonry and Roofing with an email address of chicagomasonryroofing@gmail.com.

39. A query of the Illinois Secretary of State, Business Entity Search revealed no filings for Chicago Masonry and Roofing.

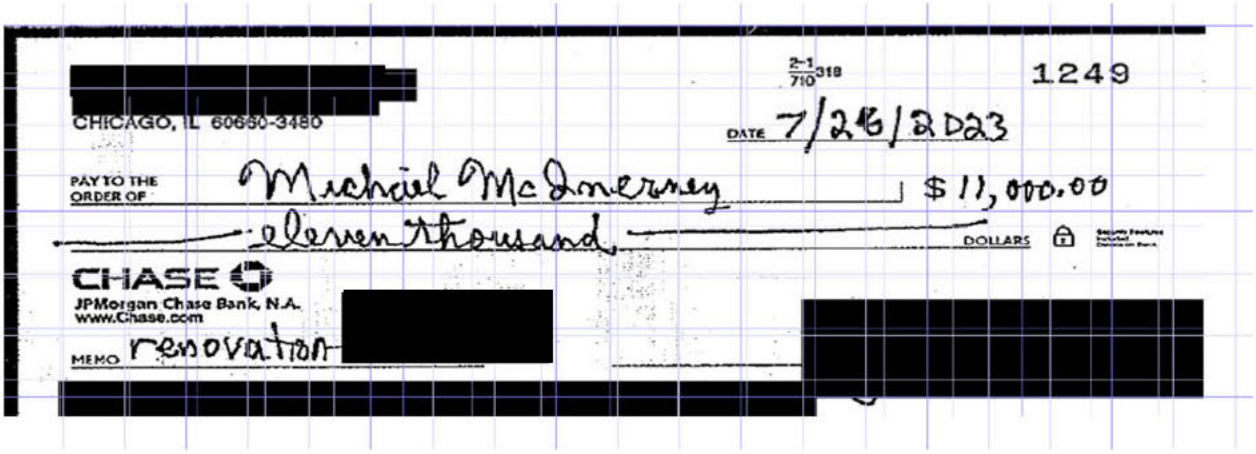
40. Victim 3 said that the work truck that was associated with Chicago Masonry and Roofing had Tennessee license plates.

41. "Charlie Culter"/Connors directed Victim 3 to write checks to Michael McInerney, rather than to Chicago Masonry and Roofing.

42. Victim 3 allowed "Charlie Culter" to examine the chimney and hired him to perform work. Victim 3 reported that day laborers mostly worked on the chimney.

43. McInerney used his Citizens Bank debit card in Chicago, Illinois, at restaurants and Home Depot stores between July 17, 2023, and July 27, 2023.

44. McInerney deposited checks from Victim 3, written July 20, 2023, and July 26, 2023, for a total amount of $14,000, into his Bank of America account.


[redacted]
CHICAGO, IL 60660-3480
2-1/710 319
1249
DATE 7/26/2023
PAY TO THE ORDER OF Michael McInerney $11,000.00
eleven thousand DOLLARS
CHASE
JPMorgan Chase Bank, N.A.
www.Chase.com
MEMO renovation [redacted]

August 2023: Marc Heller, of Washington, D.C., obtained a default judgment against McInerney and Connors after Connors induced Heller to hire him, directed Heller to write checks to McInerney, and disappeared when Heller questioned his credentials.

45. After speaking with Victim 3, HSI agents interviewed Marc Heller, a homeowner in Washington, D.C.

46. Heller reported to agents that a person named "Charlie Simms" presented himself as working for a company called Washington Roofing and Masonry.

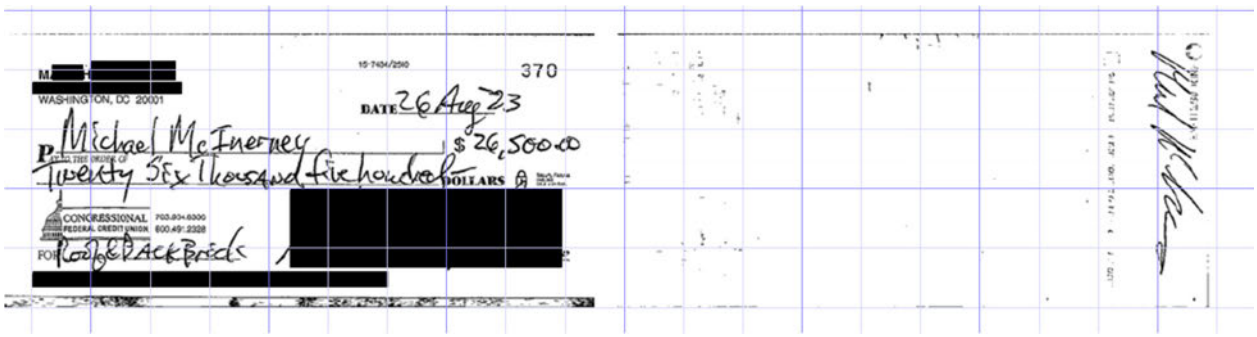
47. Through photograph line ups, Heller identified "Charlie Simms" as Connors and a man who identified himself to Heller as "Mark" as Michael McInerney.

48. Heller entered into a contract with Washington Roofing and Masonry.

49. Connors and a crew of laborers repointed some bricks and then tore off and replaced the roof of Heller's home.

50. Heller told investigators that "Simms" (Connors) directed him to write checks to McInerney.

51. McInerney deposited checks written by Heller for a total amount of $60,000, on August 15, 17, 21, and 23, 2023.


M[redacted]
[redacted]
WASHINGTON, DC 20001
370
DATE 26 Aug 23
PAY TO THE ORDER OF Michael McInerney $ 26,500.00
Twenty Six thousand five hundred DOLLARS
CONGRESSIONAL FEDERAL CREDIT UNION
FOR Roof & Brick
[redacted]

52. McInerney used made debit card purchases in Maryland, Virginia, and Washington, D.C., in August 2023 and September 2023.

53. Heller discovered that Washington Roofing and Masonry was not a licensed company.

54. Heller then confronted "Charlie Simms"/Connors, who became confrontational and threatened to tear up the roofing job if Heller did not pay him $20,000.

55. Heller never saw "Charlie Simms"/Connors again.

56. An inspection revealed issues that Heller spent money to fix.

57. Heller subsequently filed a lawsuit against Connors and McInerney in the Superior Court of the District of Columbia and obtained a default judgment. In its order granting Heller's motion for a default judgment, the court found that Connors and McInerney violated local regulations by acting as contractors because they were not licensed.

January 2024: Law enforcement inventoried McInerney's car after a traffic stop and discovered the Defendant Property.

58. On January 20, 2024, a police officer saw a Land Rover Defender bearing Massachusetts registration number 3YTW25 make an illegal turn while exiting the Holiday Inn Express in North Quincy, Massachusetts.

59. The officer stopped the vehicle and asked the operator for his license and registration.

60. The operator, who was later identified as McInerney, provided the officer with a cell phone photo of his registration, an Irish driver's license, and a Massachusetts learner's permit.

61. Also in the car was McInerney's wife, Crystel O'Reilly, who stated that she did not have a license.

62. The officer then cited McInerney for making an illegal turn and for driving without a license.

63. The officer then advised McInerney that they would tow the vehicle and allowed McInerney to remove his belongings from the vehicle.

64. Law enforcement then towed the vehicle to Ayer, Massachusetts.

65. While inventorying the vehicle, law enforcement discovered a white trash bag in the rear passenger compartment that contained a clear plastic cosmetic bag that contained, among other things, the Currency, which was in $100 increments, with $30,000 in one white sock and $40,000 inside a second sock, and the Rolex Watches.

66. In 2023 and 2024, McInerney and O'Reilly were nonresident aliens who could not lawfully work in the United States.

67. Law enforcement was not able to locate any currency reports that show that either McInerney or O'Reilly brought currency into the United States.

68. The officer was aware of numerous construction and masonry frauds being conducted by Group members and were aware that the modus operandi of such groups included members driving without a license, using luxury vehicles, and converting proceeds into jewelry.

69. Based on the presence of these factors, the officer contacted HSI. HSI then began administrative forfeiture proceedings.

McInerney was illegally present in 2023 and 2024, and his accounts contained wires to Ireland and the United Kingdom and a check to Connors.

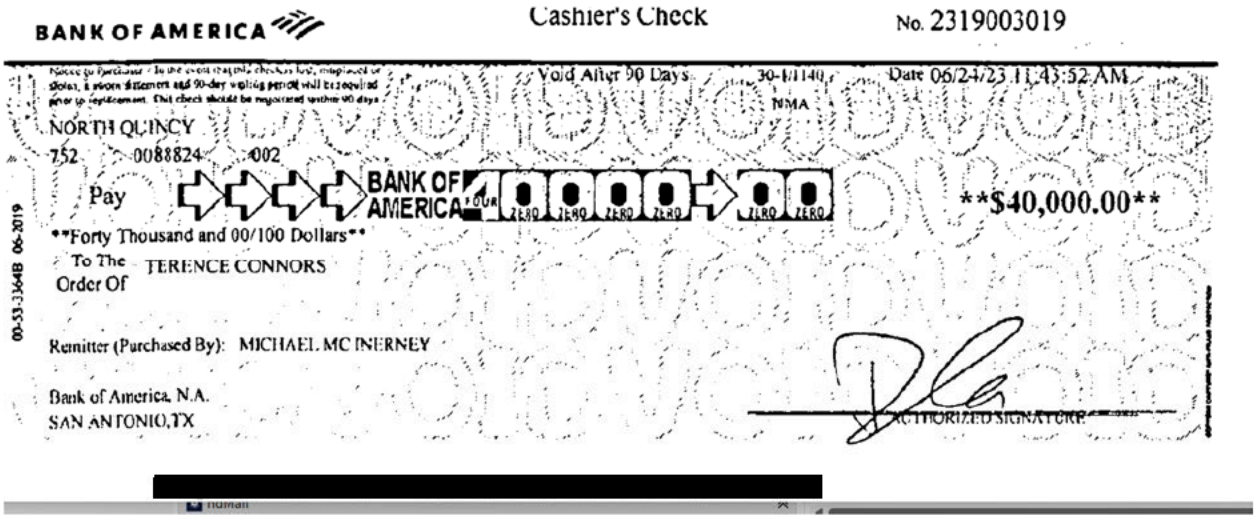
70. Records from the United States Customs and Border Protection ("CBP") do not show a legal entry for McInerney (or his wife, Crystel O'Reilly).

71. When McInerney opened a bank account in June 2023 with Bank of America, he represented that he was a nonresident alien.

72. From June 8, 2023, until December 11, 2023, approximately $351,000 was deposited into McInerney's Bank of America checking account.

73. Between July 21, 2023, and January 9, 2024, approximately $116,000 was wired from that account to overseas accounts located in Great Britain and Ireland to either McInerney or a person named "Gerard Connors."

74. On June 26, 2023, McInerney obtained a cashier's check for $40,000 from Bank of America. The payee on the check was "Terrence Connors."


BANK OF AMERICA

Cashier's Check

No. 2319003019

Void After 90 Days

30-1/1140
NMA

Date 06/24/23 11:43:52 AM

NORTH QUINCY
752 0088824 002

Pay

BANK OF AMERICA

$40,000.00

Forty Thousand and 00/100 Dollars

To The Order Of TERENCE CONNORS

Remitter (Purchased By): MICHAEL MC INERNEY

Bank of America, N.A.
SAN ANTONIO, TX

AUTHORIZED SIGNATURE

00-53-3364B 06-2019

[redacted]

Forfeiture Petition

75. By seizure notices dated February 26, 2024, and April 17, 2024, the government advised McInerney and O'Reilly that the Defendant Property had been seized and was subject to forfeiture.

76. On June 18, 2025, McInerney and O'Reilly filed a claim and asked that CBP refer the case for judicial action. In support of that request, they provided the following information:

PART I
List all the items in which you claim an interest. Include sufficient information to identify the items, such as serial numbers, make and model numbers, aircraft tail numbers, photographs, and so forth. Attach additional sheets of paper if more space is needed. Two Rolex watches Skydweller and yahtmaster one and $70,000 in cash

PART II
State your interest in each item of property listed above. Attach additional sheets of paper if more space is needed. Me and my wifes Personal belongings

77. Based on McInerney's involvement with Connors, his financial history, Heller's identification of him through a photograph lineup, the judgment Heller obtained against him, and the lack of assertions or documentation that the Defendant Property was obtained through legitimate means or intended for legitimate purposes, investigators believe that the Defendant Property is, or is derived from, the proceeds of illegal activity in violation of 18 U.S.C. § 1343 or conspiracy to commit such offense and/or was involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 or traceable to such property.

FIRST CLAIM FOR FORFEITURE
(18 U.S.C. § 981(a)(1)(A))

78. The allegations contained in paragraphs 1 to 77 are incorporated herein.

79. As set forth above, the Defendant Property is property involved in a transaction or attempted transaction in violation of 18 U.S.C.§ 1956 or traceable to such property.

80. Accordingly, the Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

SECOND CLAIM FOR FORFEITURE
(18 U.S.C. § 981(a)(1)(C))

81. The allegations contained in paragraphs 1 to 77 are incorporated herein.

82. As set forth above, the Defendant Property is property which constitutes or is derived from proceeds traceable to a violation of any offense constituting "specified unlawful activity," i.e., wire fraud, as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1) or conspiracy to commit such offense.

83. Accordingly, the Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, the United States of America requests:

a. That a Warrant and Monition, in the form submitted herewith, be issued to CBP or its designee, or any other U.S. government official commanding seizure of the Defendants *in rem*, and to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;

b. That judgment of forfeiture be decreed against the Defendants *in rem*;

c. That thereafter, the Defendants *in rem* be disposed of according to law; and

d. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By: /s/ *Annapurna Balakrishna*
Annapurna Balakrishna
Assistant United States Attorney
One Courthouse Way, Suite 9200
Boston, Massachusetts 02210
[redacted]

Date: November 17, 2025

Verification

I, Aaron G. Lindaman, hereby verify and declare, under penalty of perjury, that I am a Special Agent with the Homeland Security Investigations and, pursuant to 28 U.S.C. § 1746, that I have read the foregoing Verified Complaint for Forfeiture *In Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, information, and belief.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, and my investigation of this case together with other law enforcement officers.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of November 2025.

AARON C LINDAMAN Digitally signed by AARON C LINDAMAN
Date: 2025.11.17 12:18:04 -05'00'

Aaron G. Lindaman
Special Agent
Homeland Security Investigations