

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

LOUIS COLAVECCHIO,
Defendant.

Criminal No. 19 - 030 JJM

GOVERNMENT'S SENTENCING MEMORANDUM

I. INTRODUCTION

The Defendant

The defendant, Louis Colavecchio (COLAVECCHIO) is now a septuagenarian and a senior statesman of the criminal justice system. Historically, he is an old time mobster and counterfeiter of some repute. Anecdotally, he earned his nickname *The Coin* by counterfeiting slugs used in slot machines at gambling venues. He has reportedly been banned from every casino in the country.

His Presentence Report (PSR) reads like a badly written crime novel. In 1997, COLAVECCHIO was federally convicted of counterfeiting casino tokens in a massive operation that targeted all of the Atlantic City casinos in New Jersey and the Foxwood Casino in Connecticut. At the ripe age of 55, COLAVECCHIO received a 27-month federal sentence from the United States District Court for the District of New Jersey for

his first counterfeiting conviction. *See PSR at ¶30.* COLAVECCHIO was also convicted of larceny in 1997 by the State of Connecticut and received a seven-year suspended sentence. *See PSR at ¶31.*¹

COLAVECCHIO was next convicted by the state of Rhode Island in 1998 for obtaining money under false pretenses, after he was caught stealing \$100,000 from his 92-year-old aunt in a septic plot to which he confessed. *See PSR at ¶32.* For that crime, he received a 54-month suspended sentence. COLAVECCHIO has also tussled with uniformed police officers in the past. He resisted a lawful arrest after attaining senior citizen status at the age of 64. For that crime he received a one-year suspended sentence in 2006. COLAVECCHIO even failed to complete that short sentence without incident. He admitted to an unspecified violation five months into the sentence. *See PSR at ¶32.*

Most recently (prior to committing this second counterfeiting crime) COLAVECCHIO was convicted in Providence County Superior Court for cultivating kilograms of marijuana in a sophisticated indoor grow operation. Besides the marijuana, a quantity of cocaine, methadone pills, and cash proceeds of drug sales were recovered from his home. At the time he committed those crimes, he was already 74 years old. In yet another unearned act of judicial leniency, COLAVECCHIO was spared jail again with the award of a seven year suspended sentence. In fact, COLAVECCHIO was regularly reporting to a state probation officer when he embarked on his latest counterfeiting scheme that led him to this newest conviction.

¹ The records have since been destroyed but this is likely the companion case to the New Jersey federal prosecution.

The Offense

In June of last year, the United States Secret Service opened this investigation into the self-proclaimed “world’s greatest counterfeiter” and his efforts to produce bogus United States \$100 bills. The facts are reported in the PSR but the essence of the man committing the crime was also captured on tape as haughtiness. During two videotaped undercover meetings, COLAVECCHIO showed-off to the informant, boasting to her that he was going to foil even the newest security features of the \$100 bills in circulation. In one meeting, he explained that he was already working on a defense should he be caught. If apprehended again, he planned to claim that he was working as a counterfeit deterrence specialist to fool the investigators. Unfortunately for COLAVECCHIO, that pre-conceived act of deception was caught on tape.

II. ARGUMENT

That criminal history and the facts of this case alone are enough to support and justify a prison sentence within the guideline range. Even for a man of advanced age and failing health. After all, age and health have never stopped COLAVECCHIO from committing new crimes. Those factors have just benefitted him in his mission to best the criminal justice system and win lenient sentences. Past acts of judicial tolerance have only permitted him the liberty to move on to his next criminal venture.

Fortunately, this sentencing Court also has COLAVECCHIO’s own words by which to judge the man. COLAVECCHIO detailed his life along with his views on crime and punishment in an autobiography. In his own words, he portrayed himself as

a life-long criminal who measured his success by his ability to commit, profit by, and avoid punishment for crimes. All the while ridiculing the honorable men and women who have investigated his many, many, crimes and belittling the court system that failed to sentence him to any significant time in prison.

The Autobiography

The offense conduct and the criminal history published in the PSR do not begin to capture a complete picture of COLAVECCHIO's life of crime. Only a few years ago, in 2015, he published an autobiographical book, *YOU THOUGHT IT WAS MORE, Adventures of the World's Greatest Counterfeiter*, telling the story of his crime-filled life with egotistical panache. The phrase "you thought it was more" marked "a mobster as being with the Providence Office." *You Thought It Was More*, Colavecchio, p. 21.² "The Providence Office" was a reference to the Patriarca Crime family.

Drawing further attention to himself, he touted his criminal notoriety on television. The cover of the book proclaimed that the pages contain his story, *Louis The Coin - As seen on The History Channel and The BBC*.³ COLAVECCHIO was the principle author. COLAVECCHIO should have waited to publish his autobiography until after he retired from a life of crime.

The Author's Note (dated December 9, 2014) sets the theme:

Did I really sit at the right hand of Raymond in Providence?
Did I really soak the sheets with red wine in a week of

² All page references are to COLAVECCHIO's book cited by page number.

³ The United States has not undertaken a review of those broadcasts as COLAVECCHIO's autobiography is revealing enough.

partying with three young women in Rome? Did that police chief really thank me for fixing my speeding ticket going 140 mph in a Lamborghini - after the event made the nightly news???

The Early Years

According to COLAVECCHIO, his criminal escapades started in his teen years. Over the course of time, he enjoyed the tutelage mobster and businessman, Vincent Miele (who he referred to as Vinny or his Uncle Vinny) and the New England Crime Boss, Raymond Patriarca (The Boss, The Old Man, or George). They were men that COLAVECCHIO idolized. (p. 16). He shared the presence of mobsters and hitmen throughout the account of his entire life. A young mind shaped by such powerful and influential role models holds that shape well beyond the average criminal. He wrote, "I was so fascinated by the wise guy lifestyle, I'm sure I would have wound up in that scene." (p. 18). As a man in his 70's he still admires the lifestyle. He romanticized his role as a wise guy throughout 21 chapters and an epilogue.

COLAVECCHIO started by tricking people into buying his Uncle Vinny's fake luxury brand sweaters. (Chapter 1). He later moved on to creating his own swindles, "Hustling was fun, and before long, I felt confident enough to go out on my own." (p. 39).

COLAVECCHIO was quickly able to devise a plan of his own to steal money from Catholics. He sent rosaries in the name of a reverend to unsuspecting members of the public. With the rosaries, he asked for donations to allow the "reverend" to continue to dedicate his life to missionary work. (p. 42). There was no missionary work and the

donations never left COLAVECCHIO's pocket. A postal worker tipped him off that Postal Inspectors were investigating "a scam to bilk people out of money in the name of the Catholic Church." To thwart the investigation and avoid apprehension, he simply abandoned the money that remained in the post office boxes to avoid making a pick-up while subject to surveillance. He reflected, "We had a pretty good run, and neither Vincent or I felt too badly." COLAVECCHIO wrote that he had "no moral regrets about what we had done." (p. 43).⁴

COLAVECCHIO was unfazed by his near miss and loss of profits. By then he had established an illicit enterprise that he named *Dean Sales, Co.* (Chapter Two). His warehouse space "was constantly being visited by wise guys, cops, politicians, judges, hustlers, shoplifters and every type of person imaginable. They bought all types of swag, ranging from jewelry, watches, china, crystal, flatware, fur coats, and all kinds of other stolen goods." (p. 48). On one occasion, he "received a load of five thousand stolen designer raincoats." COLAVECCHIO recalled that before the FBI could strike, "a Providence Police detective [name omitted] – an alcoholic who liked to associate with wise guys" tipped him off. He managed to avoid arrest and profit from the crime anyway. (pp. 48 – 51). COLAVECCHIO observed, "Circumventing the law was very easily done in those days." (p. 118).⁵

⁴ Similarly, at the age of 22, he created cheap models of the Vatican-owned statue "Pieta" by Michelangelo and sold them to avid church members outside the 1964 World Fair in New York. (p. 44).

⁵ Explaining how a convicted felon was able to own a bar and hold a liquor license through a loophole in the law.

The Adult Years

Following that larcenous start as a young man, COLAVECCHIO committed mortgage fraud (p. 52) bank fraud (p. 53), insurance fraud (p. 77 - 78), and staged burglaries (p. 80 - 81), he also committed robbery (p. 86 - 88) and burglary (p. 98) -- to catalogue just a sampling of the crimes to which he laid claim. He even illegally manufactured a firearm silencer. (p. 299). COLAVECCHIO's autobiography rarely advanced more than a few pages without the retelling of some crime in which he participated, from which he profited, or the commission of which he admired. After one burglary, COLAVECCHIO recalled showing his accomplice something:

It was a poster from the Department of Education. It said someone who drops out of high school will earn approximately \$240,000 in their entire lifetime, while someone with a high school diploma would earn approximately \$320,000 in his lifetime. The poster was urging kids not to drop out of school and those that did drop out of school to go back and get their high school diploma. I remarked to Vincent that we had just made more money in the last couple of hours than two high school graduates did in their entire lives.

COLAVECCHIO took pride in duping any system at all, including "Ma Bell." (Chapter 8). In the age of pay phones, COLAVECCHIO made and sold "black boxes" a device that allowed users to place long distance calls free of charge. He reflected, "now I knew why the wise guys would pay so much money for some of the things that I made. Not that I ever doubted my workmanship; after all, I'm a perfectionist to the ultimate degree." (p. 140). COLAVECCHIO bragged, "... it fooled one of the biggest corporations in the world." He referred to himself as "brilliant" for his handiwork in that crime. (p. 141).

Often times, while describing his criminal exploits COLAVECCHIO exhibit abject disdain for law enforcement because he thought they were too stupid to catch him or even suspect him as the mastermind behind the crimes. After the unsuccessful execution of a search warrant by the FBI trying to find the load of stolen raincoats, he demeaned the agents writing, "Pissed, and vowing this would not be the end of the matter, the f***** cheap suits left." (p. 51).⁶ In one instance, the FBI showed up to investigate a heist in his store. The crime was staged for the insurance money. COLAVECCHIO mocked their inability to figure out he was behind the crime, "I lit up a Muratti and made it a point to smoke it with my left hand [injured in the crime]. I flashed the bandages right under his f***** pointed nose and he never asked me what caused me to be bandaged up." (p. 103).

After being caught with 800 lbs. of counterfeit tokens in his car, the arresting agents transferred the contraband from COLAVECCHIO's Honda to a government vehicle. The sheer weight of the evidence of COLAVECCHIO's guilt caused the agent's Buick to sustain under carriage damage on a speed bump as it drove away. He remarked:

- The f***** jerk didn't realize that he didn't have enough clearance to pass over the speed bumps. Couldn't he feel the steering? It must have felt light as all hell.
- [He] looked like a real jerk.
- You could see the surprise and anxiety in [the agents'] faces as they waited for the second car.

⁶ For the sake of propriety, the United States will redact COLAVECCHIO's oft-used expletives. His literary style makes almost juvenile resort to profanity.

- I have to admit it was funny.
- They held my car for six weeks, at a cost of \$971 ... for storage alone trying to figure out what I had done to the Honda so it didn't do what the Buick did. They had experts examine the suspension, springs, axle, shock absorbers but no one noticed the three-quarter inch piece of plywood lying quietly under the trunk's rug. (p.329).

In many of his criminal escapades, when COLAVECCHIO came face to face with law enforcement, he accused them of being corrupt, incompetent, and intimidated by his genius. However, on one occasion while attempting to aggrandize himself, COLAVECCHIO spoke glowingly of a State Trooper who was impressed with his criminal talents. "The New Jersey trooper, who had tried so hard to make my life intolerable, now had a whole different attitude. He called his wife and said, 'I'll be home late honey, I'm with Big Lou.' He turned around, and asked if I would mind saying a few words to his wife." After joking with the Trooper's wife, COLAVECCHIO acquiesced to "say a few words" to other friends of the Trooper, apparently to impress them that the Trooper really was in the presence of an accomplished and notorious criminal. COLAVECCHIO graciously accepted the Trooper's apology for doing his job, "Nothing personal." (p. 330).

Even with his head filled with the arrogance that he accrued over the years profiting from crime and outsmarting law enforcement, COLAVECCHIO still found himself in shock when he realized that other people committed crimes that he did not know about and from which he was not getting a cut. During the time he owned a car

dealership, he was fraudulently securing loans to purchase luxury sports cars imported from Italy. When the loan officer in charge of his account was found to have been stealing, COLAVECCHIO lamented, "Sh**, if I ever knew this a** - hole was stealing, I would have been first in line to grab money and not just a lousy hundred grand. I had no idea he was robbing from the bank. I felt like a moron, and a moron with real bad timing." (p. 213 - 214).

The First Counterfeiting Crime

In a chapter that COLAVECCHIO entitled, *The Counterfeit King*, he recounted the crime that led to his first counterfeiting conviction. (Chapter 14). In this chapter, COLAVECCHIO devoted many pages to describing in great detail the technical processes of minting coins and the obstacles he encountered in duplicating casino chips and tokens. Of course, in the retelling, ever flaunting how clever he was at the art of counterfeiting.

"As soon as possible, I began taking chips to casinos everywhere ... It was a thrilling life." (p. 271). COLAVECCHIO even found some solace in his arrest. He proudly observed, "All the coins they bagged from several of the machines we played came back either genuine or uncertain. Four f***** labs came to the same conclusion. The retired agent said they were wondering if I was for real or not. They took a chance when they finally decided to arrest us." (p. 288). COLAVECCHIO still believed, "Lots of casinos today are playing with chips I made my garage!" (p.271). His lack of remorse was even more apparent as he wrote, "Can you imagine that? I felt guilty if I didn't

have the machinery working night and day, but felt no guilt about what the f*** I was doing with that machinery.” (p. 292).

COLAVECCHIO was convicted of using the counterfeit chips and slugs in Connecticut and New Jersey. However, those were not the only venues he polluted with counterfeit. He shipped thousands of pounds of tokens to Las Vegas. (p.361). And, casino tokens were not the only items that COLAVECCHIO copied. He boasted, “Making counterfeit items must have appealed to me in some way that I didn’t understand. Between the Gucci line of belts, the Charles Garnier jewelry, the Barry Cord Kieselstein silver alligator belt buckle made famous by the tragic death of Nicole Simpson, the slugs, the casino chips, and my last project, the casino slot machine tokens, I must have counterfeited more items than anyone alive.” (p. 271).

The account he gave of his prosecution were as self-aggrandizing as the rest of the story of his life. He claimed to get a sweetheart deal for a variety of reasons and to beat the system even at that:

I had to pay \$90,000 restitution as part of my plea agreement, but I only paid \$75 per month. Since I was on suspended release three years and didn’t begin paying until four months into the three year period, I paid only \$2400 in total. Technically, that was a violation of my release, and I could have had my supervised release extended until the \$90,000 was paid in full, or I could have gone to jail on a violation. Instead, Anne E. Thompson dismissed my supervised release and my restitution early, and sent me a refund saying that the court considered it paid in full for the month before and sent the \$75. No doubt about it, the chemistry was there. (p.374).⁷

⁷ COLAVECCHIO had earlier explained what he meant by “chemistry.” He wrote, “When the judge entered the room, I wished I was on the other side of the podium, because I would have asked her out on a date. There was a chemistry between us that you could cut with a knife. I loved her instantly and I haven’t had this feeling too many times in my life. Her name was the Honorable Anne E. Thompson, and

Violent Crime

Aside from a conviction for resisting a lawful arrest (at age 64), the PSR does not include any convictions for significant crimes of violence. However, COLAVECCHIO admitted to committing several in his autobiography. Both for business purposes and as a thug COLAVECCHIO revealed, "I never went anywhere without a gun." He described paying a visit on a man with whom he had a dispute. COLAVECCHIO detailed, "I had a small Colt Jr. .25 caliber automatic in my right pants pocket. The bullet was chambered before I went in the house. The gun was set to fire. I needed only to cock the hammer and pull the trigger." (p. 60).

COLAVECCHIO bragged of a number of instances in his life where he enthusiastically resorted to violence. On one occasion, a man wrote him a bad check. COLAVECCHIO observed "If I didn't get my money, I'd beat him to a pulp" then recounted how he brought the man to his mother's house and demanded that the man's mother pay the debt. (p. 87).

One time, COLAVECCHIO used a strong-arm (that he called "Paddy") to viciously beat a man for "a f***** lousy \$3500" that he was owed. Not satisfied to simply send the enforcer to inflict a beating COLAVECCHIO went himself because, "this one was personal ... he was making a f***** fool out of me." (p.172). He portentously reiterated, "I went along on this collection because I wanted to see the mother f***** 's face when I showed up at his place." (p. 173). The victim was beaten so savagely "the

she was the chief United States District Judge. When our eyes met I could feel the chemistry penetrate the distance between us. (p. 370 - 371).

guy's nose was spitting blood like Old Faithful." When the victim fell silent, COLAVECCHIO coldly instructed his enforcer, "Don't kill the a** - hole. I want my f***** money." (p.174).

With the victim bloody and beaten, COLAVECCHIO told of how he "casually" strutted around the man's office to find the money he was there to collect. When the victim did not cooperate in efforts to open a safe -- another round of beating began, "you could hear the guy's f***** nose breaking in a couple of places and the familiar sound of a broken jaw." (p. 174). He stole the man's cars to make up for the shortage of cash in the safe. COLAVECCHIO paid the enforcer \$400 for beating the victim so badly. They suffered no repercussions. It was a fact of which he was proud, "No mention of what we had done or consequences were ever brought and Paddy and I actually felt we helped him a lot." (p. 177).⁸ That sort of experience undoubtedly nurtured COLAVECCHIO'S sense of being invincible. That theme ran through the life he recounted in his autobiography.

This self-told account of COLAVECCHIO's life history paints the picture of a man whose devotion to criminal pursuits absolutely prevented him (and will prevent him) from leading a normal life. He is effectively unable to enjoy life without conceiving new criminal ventures. It is who he is and what he does. The *world's greatest counterfeiter* is proud as a peacock, "I never appreciated or recognized the multiplicity of talents and skills I possessed until I began reading about them in my Pre-Sentence

⁸ By putting the victim out of business.

investigation and other legal documents the government presented after my arrest.” (p. 272). Criminal pursuit forms the fabric of his life and his sense of identity. In fact, COLAVECCHIO purports to hold a “Doctorate in Crime.” (p. 400).

Prison Life

During his brief time in prison for his first counterfeiting conviction, COLAVECCHIO enjoyed prestige as a notorious criminal and powerful inmate. He met new inmates with a familiar greeting, “Hi, I’m Lou.” (p. 393). Apparently, no last name was necessary. A man nicknamed “The Sarge” a former Army Ranger and a “trained assassin” paid him homage, “Yeah, I can see you’re the boss around here.” (p. 393).

Throughout his entire incarceration, he described prison life as surrounded by friends, criminal colleagues, and guardians, who did his laundry for him, gave him haircuts, cleaned his room, and protected him day and night. “What a f***** beautiful crew we had. It was non-stop laughter from then on.” (p. 397). Eventually, he was surrounded by such servitude that prison became a real home for him. (p. 409). Correctional officers, however, held a lower station than other members of law enforcement who were merely incompetent. He opined, “I think it was a job requirement that a CO be inbred and illiterate to get his job.” (p. 386). COLAVECCHIO figured that, “I gave the government two years of my life, but I got back experiences that make it more than worth the two years I lost.” (p. 425).

Epilogue

COLAVECCHIO felt no remorse for a lifetime of criminal activity, “Do I feel guilty that what I did was wrong? No, I don’t.” (P. 423). He measured his success by

calculating how much he benefitted from his crimes against how much he had to suffer from them with mathematical precision, "... When I was first sentenced to 27 months – that as a former math teacher, at my age, middle 50's, 27 months was around four percent of my life. That's a small percentage to pay for living as well as I did. If I can make it to 100 years old, I will have lived my lifestyle and spent only two percent for doing it my way. Cool, huh?" (p. 421).

III. CONCLUSION

COLAVECCHIO's autobiography portrays him as an adrenaline junkie who will always climb a higher mountain, jump from a higher cliff, and dive deeper into the depths to get his next fix. Only, COLAVECCHIO commits crimes to get his next fix, his next brag, his next triumph. He seemingly has to have the last laugh at the criminal justice system. His identity hinges on successfully playing the system and getting away with it.

COLAVECCHIO should receive a prison sentence because he has an incurable desire to claim the upper hand on the criminal justice system. He also has a criminal appetite undeterred by age, health or incarceration -- and perhaps more importantly, by attempts at judicial leniency. Each suspended sentence, each dismissal of a charge only fed into his sincere belief that he is smarter than everyone working in the criminal justice system. He has, by his own boastful admissions, committed vastly more crimes than he was ever been caught committing, often while on conditional release. In fact,

even after being awarded pretrial release in this case, COLAVECCHIO tested positive for cocaine.⁹

Throughout his autobiography, COLAVECCHIO took great pride in his criminal achievements and his ability to avoid punishment. He shamelessly bragged about his life choices; it was as though manipulation of the criminal justice system was half the fun for him. COLAVECCHIO profited from a lifetime of criminal exploits, he relished in the notoriety of his crimes, and nourished his sense of self by walking down memory lane over the course of 426 pages -- ending the book in 2015 with the possibility of more crimes to come. He ended his story, "... I still have some possibility to change the ending, the final chapter. The matches are pretty much burnt out now, but maybe I'll get just one more light, just one more chance. That would be nice. 'You thought it was more.'" (p. 426).

And so it was. This newest counterfeiting crime began after he published those final words in 2015. He lit one more match even as he served probation for a drug trafficking offense. A crime that he committed at 74 years of age. Now in 2019, he once again stands before a United States District Court poised to marshal wit and charm, age and health, to try to avoid jail and mock the system one more time. COLAVECCHIO will never change and society can only be protected through his incarceration. Without a guideline sentence, we all become his final triumphant chapter.

⁹ At 77 years of age, with a variety of medical conditions that he claimed are debilitating, and after being granted pretrial release, COLAVECCHIO soon tested positive for cocaine. When confronted about his drug use by his supervising probation officer, he denied addiction, refused treatment, and explained that the drugs were just for sex.

IV. RECOMMENDATION

The United States agreed to recommend a sentence within the guideline range as determined by the court. The PSR calculated COLAVECCHIO as a Level 13 - Criminal History Category II offender. His guideline range is 15 - 21 months of imprisonment. The high end of that range is lower than the 27 months that he received for his last counterfeiting conviction. That sentence did not deter him from making bogus \$100 dollar bills.

The United States therefore recommends a sentence at the high end of the guideline range, 21 months, as closest to the sentence he received for his last counterfeiting conviction. By COLAVECCHIO's math, that is again a small percentage of his life to pay for a lifetime of committing crime. However, unless he lives to be 100 as he boasted he might, this time it may be a larger percentage of the time he has left, but still a low price to pay.

Respectfully submitted,

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CERTIFICATION OF SERVICE

On this 8th day of August 2019, I caused the within "Government's Sentencing Memorandum" to be filed electronically.

/s/ Gerard B. Sullivan
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