

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, E. Austin Wozniak, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol Tobacco Firearms and Explosives (“ATF”) and have been so employed since September 1, 2013. I am currently assigned to the Boston Field Office.

2. I am a graduate of the Federal Law Enforcement Training Center, where I completed ATF Special Agent Basic Training and the Criminal Investigator Training Program. Prior to my employment with ATF, I was a police officer with the Dallas Police Department in Dallas, Texas for three years. I am a graduate of Marquette University where I received a Bachelor of Science in Accounting in 2010.

3. I was assigned to the Seattle, Washington, Field Office of ATF for approximately five years, where I worked with agents and other law enforcement agencies to target violent crime. I participated in or directed complex criminal investigations, utilized the National Integrated Ballistic Information Network (NIBIN) to identify violent offenders for prosecution, and helped create a task force of officers to investigate a series of highway shootings believed to be linked through ballistics evidence. In June 2019, I transitioned to the Albuquerque Field Office in Albuquerque, New Mexico, where I continued to conduct investigations related to firearms, narcotics, and violent crime. In March of 2021, I joined the Boston Field Division.

4. I have routinely conducted complex and multi-defendant cases during my federal law enforcement career. Based upon my training, these and other investigative experiences, and the experience of other investigators specializing in organized criminal

enterprises, I have developed an understanding of the means and methods by which formal and informal criminal entities often operate, interact, feud, and conduct their criminal enterprises.

5. As discussed below, I submit that there is probable cause that, from in or about July 2023 to in or about February 2024, the TARGET INDIVIDUALS identified in Paragraph 6 have conspired to commit wire and bank fraud, in violation of 18 U.S.C. § 1349 (conspiracy), 18 U.S.C. § 1343 (wire fraud), and 18 U.S.C. § 1344 (bank fraud); and conspiracy to steal and possess stolen mail, in violation of 18 U.S.C. § 371 (conspiracy) and 18 U.S.C. § 1708 (theft or receipt of stolen mail), (hereinafter, the “TARGET OFFENSES”). Also discussed below, the members of this conspiracy are members or associates of the Mission Hill street gang.

6. I submit this affidavit in support of a criminal complaint charging the following TARGET INDIVIDUALS for violations of the TARGET OFFENSES:

- a. Imanol RIOS-FRANCO;
- b. Jairo CABRAL-SANTOS;
- c. Brandon BAEZ;
- d. Jiovanny MATOS;
- e. Josman ROMERO DELGADO;
- f. Jonathan MARTINEZ;
- g. Anthony WORTHEN;
- h. Tyrone BRIMAGE; and
- i. Glenroy MILLER.

7. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is probable cause for the requested complaint and does not set forth all my knowledge about this matter.

PROBABLE CAUSE RELATED TO THE TARGET INDIVIDUALS

I. Introduction

8. The United States Secret Service (“USSS”) and partner law enforcement agencies, including the ATF, the Department of Labor, Office of Inspector General (“DOL-OIG”), Boston Police Department (“BPD”), and the United States Postal Inspection Services (“USPIS”) are presently investigating the TARGET INDIVIDUALS for their involvement in mail theft and a financial fraud scheme known as “card cracking.” Card cracking involves the theft and laundering of money through bank accounts in various names that are controlled by the primary offenders. Card cracking schemes are fueled by checks that are stolen from U.S. Postal Service (“USPS”) collection boxes. The ink from stolen checks are chemically washed and rewritten to various recruited bank account holders. These washed checks are deposited into checking accounts for cash withdrawal or laundering through money transfers and other means, such as the purchase of postal money orders (“PMOs”).

9. Since 2019, the Wellesley Police Department (“WPD”) has investigated check fraud reports from residents who placed checks into blue USPS collection boxes. Initially, subjects physically fished envelopes out of collection boxes with homemade devices. In response, USPS replaced traditional blue collection boxes with anti-fishing collection boxes to prevent mail theft. The newer boxes have smaller openings so an

individual could not place a typical homemade fishing device into the box. Around the beginning of 2022, mail theft in Wellesley and surrounding areas increased again.

Subsequent investigation showed that subjects stole mail through unauthorized access into USPS collection boxes using what are commonly referred to as “arrow keys.”

10. Once mail is stolen, offenders wash stolen checks with chemicals that erase hand-written ink, leaving the check otherwise intact. This process allows for the blank check to be rewritten to any intended payee in any amount. This facilitates a bank and wire fraud scheme known as card cracking, which is discussed below.

11. In card cracking schemes, bank account holders are often recruited to have stolen checks deposited into their accounts. This process helps to keep primary offenders from being identified by investigators. Account holders are typically recruited through social media or word of mouth. They provide the primary suspects with their debit card, PIN code, and online banking login information in exchange for a portion of funds from a deposited stolen check. Account holders essentially allow for a card cracking suspect to take control of their bank account. Stolen, washed checks are deposited into account holders’ bank accounts via ATM deposits or mobile deposits, the account balance is monitored, and cash is withdrawn at ATM machines as soon as it is made available by the bank.

12. Due to the vast reach of some social media recruitment efforts, some account holders are several times removed from the primary offenders and may be actual

unwitting parties. Many account holders, however, are co-conspirators or are willfully blind to the scheme.¹

13. In similar investigations, I have conducted court-authorized searches of cell phones seized from participants in such schemes. I have observed: communication with co-conspirators who recruit account holders; the trading of banking information; photographs of checks in various states of washing and rewriting at suspects' residences, the movement of U.S. currency, and ATM withdrawal slips; as well as navigation and search history documenting research of and travel to post office locations and financial institutions.

14. By design, card cracking schemes require a public-facing presence for the recruitment of bank accounts. I am aware that subjects who engage in bank account recruitment for card cracking conspiracies often have a significant presence on social media and use social media extensively in the perpetration of the underlying crimes associated with card cracking. Social media platforms are often used to recruit bank account holders, plan meetings to obtain their bank cards, and to transmit account holders' credentials for online banking. While conducting similar card cracking investigations, investigators have observed the transmission of bank account information across direct messaging features of social media platforms. Enticing recruitment ads are posted to social media platforms for the recruitment of bank account holders, and communication with account holders typically transitions from social media to direct

¹ Based on the investigative team's training and experience investigating malicious account takeovers, legitimate victims are usually locked out of their accounts because the attacker immediately changes the password. As noted in this affidavit, there appears to be a cooperative effort between the individual committing fraud and the account holder, as many of them communicate with each other.

messaging, phone calls, or other forms of encrypted communication once a relationship has been established.

II. The TARGET INDIVIDUALS

15. Based on this investigation, I believe the TARGET INDIVIDUALS are all members or associates of the Mission Hill street gang. Mission Hill is the colloquial name for the street gang that operates in the Mission Hill neighborhood of Boston, geographically centered on the “Mission Main” and “Annunciation Road” housing projects of Boston. In reviewing the Suffolk County Sheriff’s Department (“SCSD”) self-admissions to gang affiliation and documentation of gang altercations among inmates, BPD gang intelligence, and reports from BPD officers, investigators have identified approximately 100 gang members/associates operating in the Mission Hill area under the umbrella of the Mission Hill gang. Mission Hill uses the colors blue and yellow and the University of Michigan “M” logo, the Seattle Mariners and Milwaukee Brewers “M” logo, and other similar logos featuring the letter “M” to identify the gang and signify their presence. Mission Hill also refers to itself as “Money Hill,” “Debo’s World,” and “DBO Gang.” “Debo” and “DBO” are references to a deceased Mission Hill member/associate De’Andre “Debo” Russ. Mission Hill is presently engaged in a violent feud with other Boston street gangs, principally the Heath Street gang. As noted throughout this affidavit, the TARGET INDIVIDUALS often discussed mail theft and the card cracking scheme via text and social media. The TARGET INDIVIDUALS’ social media accounts similarly target and advertise to third-party bank account holders and advertise their method of washing and depositing checks in certain banks. Based on this investigation, I learned that some Mission Hill members and associates use the

proceeds from the TARGET OFFENSES to purchase weapons, which facilitates violent crime within the gang. The conversations amongst the TARGET INDIVIDUALS and the similar modus operandi used in their card cracking schemes demonstrate that the TARGET INDIVIDUALS conspired with one another to commit the TARGET OFFENSES.

16. I believe Glenroy MILLER is a Mission Hill gang member. First, MILLER has appeared on social media representing and advocating for the Mission Hill gang. Second, MILLER has been involved in multiple gang fights with Heath Street gang members while in custody at Suffolk County jail based on his gang affiliation. Third, on December 20, 2017, Heath Street Gang member Daiquan Rice Miller shot MILLER and fellow Mission Hill member Tyler Greene-Davis. Fourth, MILLER has been investigated for numerous crimes which occurred while he was in the presence of other Mission Hill members, such as discarding a firearm while fleeing police and robberies. Fifth, MILLER, has frequently been in the company of other Mission Hill gang members and associates during contacts with BPD. MILLER was arrested by ATF on October 24, 2023 following a firearm trafficking investigation and remains in pretrial detention. At the time of his arrest, ATF agents identified multiple individuals outside of MILLER's residence, including three TARGET INDIVIDUALS: RIOS-FRANCO, WORTHEN, and MARTINEZ. Once RIOS-FRANCO, WORTHEN, and MARTINEZ were frisked for weapons and checked for outstanding warrants, they were released. ATF also obtained a search warrant for MILLER's phone. *See* 23-mj-4587-DHH. On January 17, 2024, a federal grand jury indicted MILLER for firearm possession and trafficking charges. *See* 24-cr-10010-NMG.

17. I believe Tyrone BRIMAGE is a Mission Hill gang member. First, BRIMAGE has a Mission Hill gang tattoo on his right arm. Second, BRIMAGE has made rap videos featuring Mission Hill gang members and participated in rap videos produced by Mission Hill members, which promoted the reputation of Mission Hill and its gang violence. Third, BPD has many field interrogation and observation (“FIO”) reports of BRIMAGE in the company of other known Mission Hill members or associates, including MILLER, ROMERO-DELGADO, and MATOS. Fourth, BRIMAGE has approximately 89 arraignments on his Board of Probation (“BOP”) record in Massachusetts and convictions for carrying a dangerous weapon, breaking and entering in the daytime with intent to commit a felony, and several counts of larceny from a building and forgery. BRIMAGE has also had numerous arrest which occurred while in the company of other Mission Hill gang members. Fifth, conversations recovered on MILLER’s phone reveal BRIMAGE communicates with Mission Hill gang members as recently as August 30, 2023, including MILLER, ROMERO-DELGADO, and MATOS about the mail theft and card cracking scheme.

18. I believe that Jiovanny MATOS is a Mission Hill gang member/associate. First, MATOS has Mission Hill gang tattoos, including a “50” (referring to 50 Annunciation Road) and a “Money Hill” tattoo on his throat. Second, MATOS has appeared in rap videos with other known Mission Hill gang members/associates which all include the hashtag “#dbogang #dreside #moneyhill,” all of which refer to the Mission Hill gang. Third, on January 17, 2023, MATOS self-admitted to the SCSD that he was a Mission Hill gang associate for classification purposes. MATOS is a convicted felon with 18 arraignment entries on his adult BOP record in Massachusetts. On July 20, 2023,

MATOS was found guilty of three felony counts, including Injury to a Church/Synagogue over \$5,000, Larceny Over \$1,200, and Vandalizing Property for his role in stealing a deceased Heath Street member's tombstone and displaying it in the Mission Hill area.

19. I believe Josman ROMERO DELGADO is a Mission Hill gang member/associate. First, ROMERO DELGADO has a Mission Hill gang tattoo on his left hand. Second, ROMERO DELGADO has appeared in photographs with other Mission Hill gang members/associates and on social media representing the gang. Third, ROMERO DELGADO has produced and been featured in Mission Hill gang rap videos touting violence and criminal activity. Fourth, BPD has FIO'ed and arrested ROMERO DELGADO with other Mission Hill gang members/associates while committing crimes. ROMERO DELGADO has 15 entries on his adult BOP record in Massachusetts, including firearms charges, assault charges, and larceny charges. On November 3, 2022, ROMERO DELGADO was arraigned for possession of a firearm, possession of a large capacity weapon/feeding device, possession of ammunition, and carrying a firearm.

20. I believe that Anthony WORTHEN is a Mission Hill gang member/associate. First, WORTHEN has been arrested and FIO'ed with other Mission Hill gang members/associates, including MILLER. On November 20, 2019, BPD observed WORTHEN and three other individuals in a vehicle reversing out of Heath Street gang territory after a ShotSpotter notification in the area. ShotSpotter is an acoustic gunshot detection system used throughout Boston. Second, the SCSD classifies WORTHEN as a Mission Hill gang associate. Third, conversations on MILLER's phone reveal that WORTHEN, using the nickname "Bone," participated in the TARGET OFFENSES with other Mission Hill gang members. WORTHEN is a convicted felon in

Massachusetts with eight entries on his adult BOP record. WORTHEN was convicted of possession of a firearm without a permit and possession of ammunition with no FID card on June 16, 2023.

21. I believe that Jonathan MARTINEZ is a Mission Hill gang associate. First, as noted in this affidavit, MARTINEZ committed the TARGET OFFENSES with Mission Hill members. Second, MARTINEZ resided with Anthony WORTHEN at the MARTINEZ RESIDENCE, 18 Jewett Street, Apartment 2, Boston, Massachusetts. During the execution of a search warrant at the MARTINEZ RESIDENCE, agents photographed Mission Hill gang apparel. MARTINEZ has 10 arraignments on his adult BOP record in Massachusetts. MARTINEZ's criminal history consists mostly of distribution and possession with intent to distribute marijuana and more recently domestic violence and strangulation charges from May 2023.

22. I believe that Brandon BAEZ is a Mission Hill gang associate. First, BPD FIO'ed BAEZ on October 3, 2023 in Boston with ROMERO-DELGADO, who told BPD that he resided at the BAEZ RESIDENCE, 25 Rosslare Road, Framingham, Massachusetts. During periods of 2023, MATOS also lived with BAEZ at the BAEZ RESIDENCE because MATOS was dating BAEZ's mother. Second, as noted in this affidavit, law enforcement officers documented BAEZ in the presence of Mission Hill gang members and associates while committing the TARGET OFFENSES. Third, according to the conversations in MILLER's phone, BAEZ is a participant in the group chat, "Region Boyz," with other Mission Hill gang member/associates, discussing the ongoing mail theft and card cracking scheme described in this affidavit. Fourth, BAEZ is referred to as "Breezo," in conversations extracted from MILLER's cellphone, demonstrating his

familiarity with MILLER and other Mission Hill gang members. BAEZ has 18 arraignment entries on his adult BOP record in Massachusetts. Much of BAEZ's criminal history stems from mail theft or card cracking related activity. In February of 2021, BAEZ and four other subjects were arrested after leaving the Reading Post Office at 1:00 a.m. and fleeing from police in a brief vehicle pursuit. When police stopped the vehicle that BAEZ was in, officers discovered that it contained stolen mail from Reading and surrounding communities. During a search of BAEZ incident to his arrest, police found 14 bank cards bearing other people's names and four personal checks (three of which appeared to have been altered) from BAEZ's person.

23. I believe that Imanol RIOS-FRANCO is a Mission Hill gang associate. First, as detailed in this affidavit, RIOS-FRANCO committed the TARGET OFFENSES with Mission Hill members. Second, between the years 2020 to 2023, RIOS-FRANCO has been FIO'ed multiple times with BAEZ and MARTINEZ. RIOS-FRANCO is a convicted felon, with 19 arraignment entries on his adult BOP record in Massachusetts. On December 12, 2022, after a short pursuit, officers of the Newton Police Department arrested RIOS-FRANCO after he attempted to open a USPS collection box in the early morning hours. Newton Police and USPIS Inspectors recovered an arrow key during that incident.

24. I believe that Jairo CABRAL-SANTOS is a Mission Hill gang associate. First, as detailed in this affidavit, CABRAL-SANTOS committed the TARGET OFFENSES with Mission Hill members. Second, BPD FIO'ed CABRAL-SANTOS with Mission Hill gang members/associates in July 2023. CABRAL-SANTOS has 31 arraignment entries on his adult BOP record in Massachusetts. Since 2019, CABRAL-

SANTOS has been associated with mail theft and card cracking activity throughout Eastern Massachusetts. He has state court cases stemming from a mix of mail theft-related check fraud incidents and motor vehicle charges. Many of CABRAL-SANTOS' arraignments are open cases primarily consisting of check fraud, larceny, and firearms offenses. CABRAL-SANTOS has also been charged with check forgery, identity fraud, and theft in New Hampshire in connection to his role in mail theft, check fraud, and card cracking activity.

III. The Current Investigation

A. Summary of Current Investigation

25. As will be discussed in detail below, this investigation has revealed that the TARGET INDIVIDUALS are Mission Hill gang members or associates who are engaged in a mail theft and card cracking scheme. I believe that RIOS-FRANCO and CABRAL-SANTOS are responsible for stealing mail from USPS collection boxes. I believe that MARTINEZ also assists RIOS-FRANCO and CABRAL-SANTOS with stealing mail.

26. Based on this investigation, I believe that BAEZ, MATOS, and MILLER obtain stolen checks from the mail stolen by RIOS-FRANCO and CABRAL-SANTOS. I believe that BAEZ, MATOS, ROMERO DELGADO, WORTHEN, BRIMAGE, and MILLER all engage in the card cracking scheme using the stolen checks. As discussed below, the TARGET INDIVIDUALS rely upon one another to recruit account holders and update one another on how to successfully engage in the card cracking scheme.

27. I believe that RIOS-FRANCO, CABRAL-SANTOS, and MARTINEZ also engage in the card cracking scheme using stolen checks. I believe that RIOS-

FRANCO and CABRAL-SANTOS have more stolen checks than recruited account holders and sell stolen checks to further profit from their mail theft.

B. 2023 Mail Thefts Timeline

28. In the summer of 2023, WPD and surrounding law enforcement agencies began to receive numerous check fraud reports pertaining to checks that were placed in the mail throughout June and July 2023. Below is a list of relevant victims:

Name	Location of Mail Drop Off	Date of Drop Off
Victim 1 of West Roxbury	N/A	N/A
Victim 2 of Wellesley	Wellesley Square Post Office	N/A
Victim 3 of Wellesley	N/A	N/A
Victim 4 of Brookline	Chestnut Hill Hancock Village Shopping Center Box	On or about July 29, 2023
Victim 5 of Newton	Newton Centre Post Office Box	N/A
Victim 6 of Needham	Needham Heights Post Office	On or about July 1, 2023
Victim 7 of Wellesley	Wellesley Grove Street Post Office	On or about July 18, 2023
Victim 8 of Waban	Handed to mail carrier	June 24, 2023
Victim 9 of Needham	USPS mailbox in Needham	Early July
Victim 10 of Needham	Needham Great Plain Avenue Post Office	On or about October 9, 2023
Victim 11 of Wellesley	Wellesley Grove Street Post Office	On or about July 19, 2023
Victim 12 of Newton	Newton Centre Post Office	N/A
Victim 13 of Wellesley	N/A	On or about July 13, 2023
Victim 14 of Wellesley	Wellesley Grove Street Post Office	On or about July 19, 2023
Victim 15 of Newton	N/A	N/A
Victim 16 of Sherborn	N/A	N/A
Victim 17 of Newton Heights	N/A	N/A
Victim 18 of Brockton	N/A	N/A
Victim 19 of Braintree	N/A	N/A
Victim 20 of Braintree	Braintree Post Office	On or about July 21, 2023

Victim 21 of Braintree	N/A	N/A
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29. After an initial group of check fraud reports, WPD and USPIS Inspectors installed cameras to monitor collection boxes where victims had mailed checks. Investigators also cross referenced the mail thefts with BPD car stops, obtained search warrants, reviewed social media, and interviewed witnesses. Below is a timeline of relevant mail thefts in 2023.

30. **July 1, 2023, mail theft**—at 5:09 a.m., a black Audi Q5, New Hampshire registration 5195314 (“Black Audi”), occupied by multiple individuals, was used in the theft of mail from three USPS collection boxes at the Grove Street Post Office in Wellesley. The driver of the Audi exited the vehicle, accessed all three collection boxes with a key, and stole the contents of each box. An image of the vehicle and a masked subject stealing mail is below:²



7/1/23 5:09 AM
Wellesley
Square Post
Office



² Images of mail thefts throughout this affidavit are obtained through security cameras and/or pole cameras installed following reports of mail theft.

31. On February 27, 2024, investigators executed a federal search warrant at the CABRAL-SANTOS RESIDENCE, 11 Browning Avenue, Apartment 2, Dorchester, Massachusetts. *See* 24-mj-4031-DHH. Investigators seized a sweatshirt consistent with the one the masked subject was wearing on July 1, 2023. For this and further reasons discussed below, I believe that CABRAL-SANTOS was the individual stealing mail from the collection box on July 1, 2023. A photograph of the sweatshirt seized is depicted below:



2/27/2024 Sweatshirt seized from CABRAL-SANTOS RESIDENCE

32. Prior to July 20, 2023, three victims dropped off checks at the Wellesley Grove Street Post Office: Victim 7 dropped off a check on or about July 18, 2023, Victim 11 dropped off a check July 19, 2023, and Victim 14 dropped off a check on or about July 19, 2023.³

³ It is difficult to ascertain which robberies involved which stolen checks. The discovery of the stolen checks requires self-reporting and/or the discovery by banks of suspicious activity. Although victims can provide information on the checks and the intended recipients, many do not remember the exact dates or locations they dropped the checks into the USPS collection boxes, as the discovery of the stolen checks typically occurs months after the checks were dropped into USPS collection boxes.

33. **July 20, 2023, mail theft**—at 3:11 a.m., individuals used the Black Audi in another mail theft incident in which individuals stole mail from three USPS collection boxes at the Grove Street Post Office in Wellesley. During the theft, the driver exited the Black Audi, accessed all three collection boxes with a key, and stole the contents. Just five hours before this mail theft, on July 19, 2023, at 10:30 p.m., BPD stopped the Black Audi on Browning Avenue in Boston for speeding. The front seat passenger was CABRAL-SANTOS. An image of the theft is below:



7/20/23 3:03 AM
Wellesley Square Post
Office

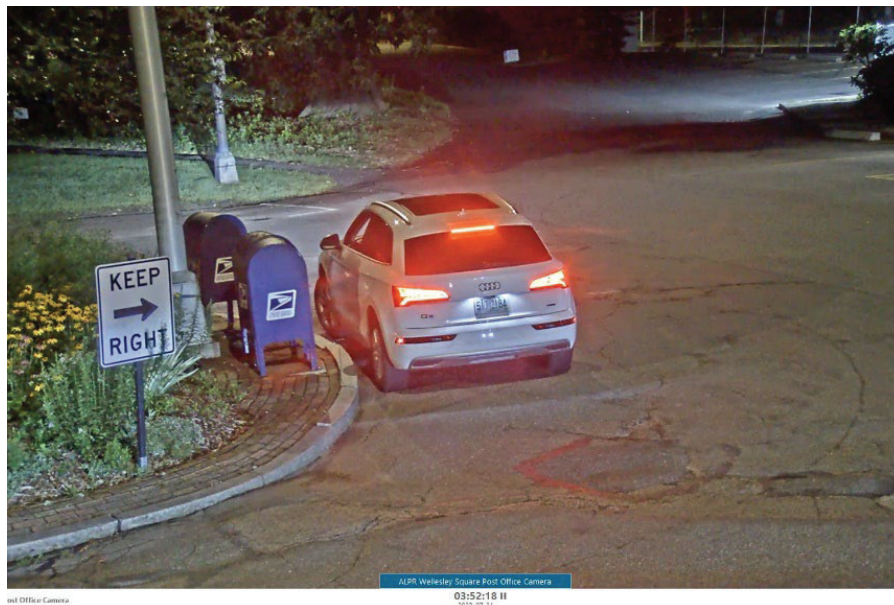


34. **July 25, 2023**—at 5:48 p.m., BPD conducted a stop of a white Audi Q5, New Hampshire registration 5172184 (“White Audi”) around Albany and Northampton Streets in Boston. The driver was CABRAL-SANTOS. CABRAL-SANTOS’ driver’s license was suspended, and the White Audi was towed from the scene. BPD issued CABRAL-SANTOS a criminal summons for motor vehicle violations.

35. **July 28, 2023**—without being aware of the July 25 BPD car stop, on July 28, an investigator went to the CABRAL-SANTOS RESIDENCE in search of the Black

Audi, associated with CABRAL-SANTOS from the BPD July 19 car stop. While at the residence, an investigator photographed the White Audi, which was parked on the street across from the CABRAL-SANTOS RESIDENCE.

36. **July 31, 2023, mail theft**—at approximately 3:50 a.m., a WPD officer witnessed the White Audi pull up to the USPS collection boxes at Wellesley Square Post Office. As the officer pulled behind the vehicle and began to query its license plate, the White Audi immediately left the area and fled at speeds of up to 90 MPH before the police pursuit was terminated for safety reasons. A photo of the White Audi on this date is depicted below:



37. **August 17, 2023, mail theft**—three subjects used a red Tesla with Massachusetts registration EVY217 (“Red Tesla”) in the theft of mail from collection boxes outside of post offices in Newton (at 3:00 a.m.) and Weston (at 3:29 a.m.). When Weston Police attempted to stop the Red Tesla, it fled at a high rate of speed. A photo of the Red Tesla and three hooded/masked subjects at the Weston Post Office is below:



38. During this investigation, I have learned that the Black Audi and the White Audi are registered to Cambridge Marketing Concepts/Posh Car Rental of Nashua, New Hampshire. The Red Tesla is registered to the president of Cambridge Marketing Concepts Inc.

39. Cambridge Marketing Concepts is a marketing and advertisement company in Massachusetts and New York. The website for Cambridge Marketing is linked to a website called Posh, which is a startup car rental/car sharing company.⁴ The Posh website allows users to create an account and select a car to rent. The website advertises that users can swap their car with another car in the company's fleet anytime depending on their subscription.

⁴ Cambridge Marketing Concepts' website is <https://cambridgemarketingconcepts.com>, and Posh's website is <https://poshcars.io/>. All the vehicles in the Posh fleet are either registered personally in Massachusetts to employees of the company or registered in New Hampshire to Cambridge Marketing Concepts. Many of the cars owned by Cambridge Marketing and its employees have an exorbitant amount of law enforcement inquiries. Several of these vehicles have been linked to law enforcement stops, police pursuits, and field interview reports in the Boston area. In recent months, law enforcement officers have documented stops associating these vehicles with several people connected to the present and previous mail theft and check washing investigations.

40. On August 17, 2023, an investigator met with a representative of Cambridge Marking Concepts, who primarily manages the business in the Boston area. The representative provided investigators with renter information for the vehicles used in mail theft incidents. Notably, the same renter was listed for all three cars during the timeframe of the mail theft incidents: C.B.R..⁵

41. The representative stated he initially met with C.B.R. and verified his driver's license on May 2, 2023, when C.B.R. rented a blue Tesla with Massachusetts registration EV77TA.⁶ On June 12, 2023, C.B.R. rented the Black Audi. The rental period ran until July 12, 2023; during that time, it was used in the mail theft in Wellesley on July 1. On July 12, C.B.R. extended the rental. During this period, the Audi was used in the mail theft incident in Wellesley on July 20. On July 23, C.B.R. reported to the representative that the Black Audi had a flat tire, and the two agreed to swap the Black Audi for another vehicle. The representative went to 75 Archdale Road in Boston that same day,⁷ where the Black Audi was reportedly parked, to swap cars with C.B.R. and give him the White Audi. When he arrived, the representative did not see the Black Audi. The representative contacted C.B.R., who stated that his brother was with the car at a car wash. The representative went to the car wash, where he saw a Hispanic male

⁵ Investigators know the true identity of C.B.R.

⁶ The rental period for the blue Tesla ran for 30 days, until June 2, 2023, and then C.B.R. extended it until June 10, 2023. While this blue Tesla was rented to C.B.R., the driver of it fled from BPD on May 3, 2023. BPD stopped the blue Tesla on May 9, 2023 and June 6, 2023. On May 9 and June 6, BPD identified the driver as CABRAL-SANTOS.

⁷ 75 Archdale Road is an apartment building managed by the Boston Housing Authority. According to the Registry of Motor Vehicles, it is the address on file for an associate of CABRAL SANTOS, who was a passenger with CABRAL-SANTOS in the blue Tesla when it was stopped by BPD on May 9, 2023.

cleaning the Black Audi. The representative described C.B.R.'s brother as a small-statured Hispanic male with pale skin, short braids on either side of his head, a beard, and a broken heart tattoo on the right side of his neck. The representative did not know his name; however, based upon the representative's description and the repeated police encounters with CABRAL-SANTOS, investigators compiled a photo array consisting of CABRAL-SANTOS and seven other subjects. When WPD administered the photo array to the representative, he identified CABRAL-SANTOS as the man he knew to be C.B.R.'s brother.

42. The representative checked the mileage on the Black Audi and learned that it had been driven significantly farther than the allotted mileage. He told CABRAL-SANTOS that they owed approximately \$1,700 in unpaid rental fees before he would allow him to take the White Audi. The representative accompanied CABRAL-SANTOS to 75 Archdale Road, where CABRAL-SANTOS entered the building and retrieved the payment in cash.

43. On July 25, 2023, the representative learned that BPD towed the White Audi as discussed above. On July 26, 2023, the representative went to 75 Archdale Road, picked up CABRAL-SANTOS, and accompanied him to BPD District B-3 to have the White Audi released from the impound. Once the White Audi was released, CABRAL-SANTOS retained possession of it under C.B.R.'s rental agreement.⁸

44. On August 3, 2023, C.B.R. contacted the representative and told him that the rear license plate to the White Audi had been stolen while it was parked in front of

⁸ Investigators did not clarify whether the representative took any steps to determine the reason the White Audio was towed or if CABRAL-SANTOS had an active license.

259 Quincy Street in Boston. The representative agreed to report the theft to BPD, bring another rental car to 259 Quincy Street, and swap it with the White Audi. The representative stated he arrived at 259 Quincy Street around 9 p.m. and met with CABRAL-SANTOS. The representative brought the Red Tesla for the swap.

45. To give CABRAL-SANTOS access to the Tesla, the representative sent a text message to CABRAL-SANTOS, who provided his phone number as (929) 685-4291. T-Mobile records indicate this was a pre-paid number that began service on July 31, 2023, and stopped on August 18, 2023, the day the representative turned off CABRAL-SANTOS' access to the Red Tesla because of its involvement in the Weston police pursuit on August 17, 2023. The Red Tesla was on the same rental agreement through the morning of August 17, 2023, when it was involved in mail theft at post offices in Newton and Weston.

46. While investigators spoke to the representative on August 17, 2023, at approximately 3:00 p.m., he checked the live location of the Red Tesla using his phone. He observed that it was parked on West Park Street in Boston. West Park Street is approximately 0.1 mile from the CABRAL-SANTOS RESIDENCE. The representative indicated that the Red Tesla's GPS only worked in real-time and was not able to preserve this information.

47. T-Mobile records showed that the device associated with (929) 685-4291 was present around the Newton Post Office and Weston Post Office on the morning of August 17, 2023, when the three subjects in the Red Tesla stole mail from collection boxes and fled from police. This number was not in service during the other mail theft dates.

48. While the representative was at WPD, he informed an investigator that he had driven the White Audi to the interview. Investigators went to the parking lot and reviewed Bluetooth connections which had been made to the White Audi's entertainment system. The list displayed an entry "Breezo." As noted in this affidavit, Breezo is a nickname for BAEZ.

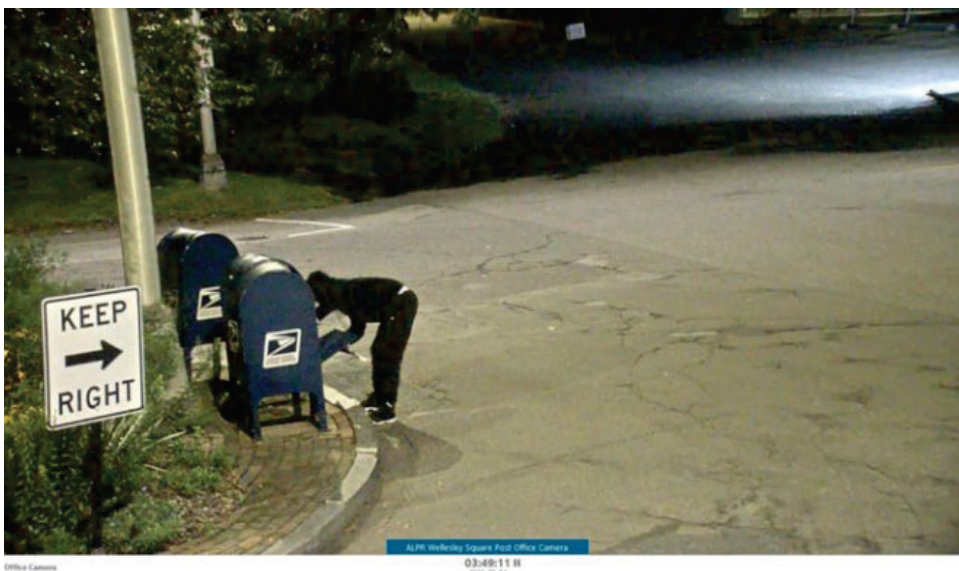
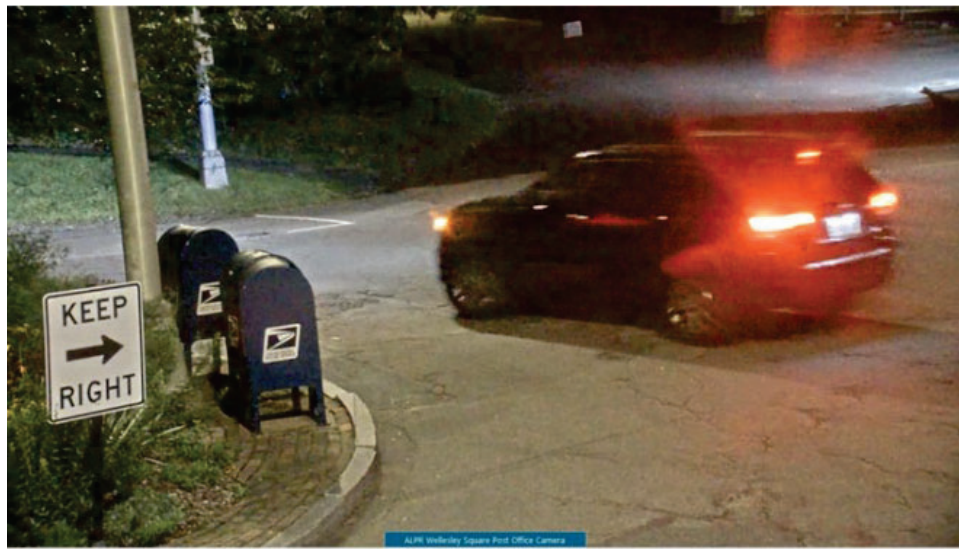
49. Based on the above mail theft incidents, I believe that CABRAL-SANTOS stole mail from USPS collection boxes to obtain checks from the mail stream that are then used in the TARGET OFFENSES. According to a confidential informant ("CI-1"),⁹ CABRAL-SANTOS is a source of stolen checks that are used in the card cracking scheme. CABRAL-SANTOS sold checks stolen from the mail for \$100 per check. CI-1 knew from CABRAL-SANTOS that CABRAL-SANTOS stole the mail using an arrow key.

50. **September 4, 2023, mail theft**—at 3:48 a.m., a black Jeep Grand Cherokee ("Black Jeep") looped through the Wellesley Square Post Office and parked. A masked subject approached and stole mail from several collection boxes. The Black Jeep left the area and headed to Needham on Great Plain Avenue. At 3:57 a.m., a USPS Automated License Plate Reader outside of the Needham Great Plain Avenue Post Office identified the Massachusetts Registration as 1RNF92.¹⁰ As explained below, this is the

⁹ CI-1 is cooperating for consideration in a pending investigation. CI-1 provided information to investigators in the winter of 2024. CI-1 has a criminal history including fraud and theft offenses. Based on corroboration obtained during this investigation, I believe that information from CI-1 is reliable.

¹⁰ The Black Jeep is registered to J.F. of Canton, who has an active Florida license. On September 4, 2023, following a car crash, RIOS-FRANCO told MSP that the Black Jeep belonged to his cousin and that he (RIOS-FRANCO) was responsible for it.

same vehicle that RIOS-FRANCO drove on July 26, 2023, more than likely the Black Jeep that was present during ATM withdrawals in Wellesley on July 27, 2023, and the same vehicle that RIOS-FRANCO totaled on September 4, 2023. According to CI-1, RIOS-FRANCO is also a source of checks stolen from USPS collection boxes that are used in the card cracking scheme. Similar to CABRAL-SANTOS, RIOS-FRANCO used an arrow key to access USPS collection boxes and sold stolen checks for \$100 per check. Photographs of the Black Jeep and the subject at the Wellesley Post Office are below:



C. The Card Cracking Scheme

51. The following is a summary of the TARGET INDIVIDUAL's involvement with the card cracking element of the conspiracy, which uses the checks stolen from the mail.

a. CABRAL-SANTOS a/k/a Dash

52. CABRAL-SANTOS is active on social media and has an Instagram account under the username "dash_ganggg." Investigators initially viewed the profile on August 23, 2023, when the profile was public. It is now private. As recently as July 17, 2023, the profile depicted photographs of CABRAL-SANTOS with the broken heart tattoo on his neck and handling a large sum of cash.

53. The verified phone number associated with the account is (347) 544-6597. In private messages to various other users, CABRAL-SANTOS provided his contact numbers as both (347) 544-6597 and (929) 685-4291 (the phone number CABRAL-SANTOS provided to the representative from Posh). Call records for the (347) 544-6597 and (929) 685-4291 logged communication with other TARGET INDIVIDUALS such as MILLER and MARTINEZ. CABRAL-SANTOS' Instagram account contained numerous photos and messages consistent with card cracking activity, some of which are below:



Left to right: a June 21, 2023, photo of an ATM check deposit in White Plains, New York; a July 11, 2023, solicitation for Eastern Bank accounts; and a July 20, 2023, display of cash fanned out across a pair of pink shorts.

54. Between June 30, 2023, and July 28, 2023, CABRAL-SANTOS had a running conversation with another Instagram user about defrauding an Eastern Bank account belonging to a third-party. For example, on July 21, 2023, CABRAL-SANTOS instructed the user to “send pin” and the user responded, “1127.” On July 22, 2023, CABRAL-SANTOS stated, “We good shit cleared,” referencing the clearing of a check on the account. CABRAL-SANTOS explained, “Just kno I gotta take it out daily manito, So just please work w me, These Easterns have low limits, Any cash app, Or Zelle, Will lock the account, So straight atm.” On July 22, 2023, CABRAL-SANTOS asked the user to reach out to the account holder and “ask if she got a text saying it’s her doing transactions, if so tell her to say yes.” CABRAL-SANTOS later stated, “Last transaction at a post office, hold on, ima tell you exact amount” and “Last transaction was at a post office for 502.00.” Based upon my training and experience, CABRAL-SANTOS and the user discussed a bank account they had recruited from a third party. CABRAL-SANTOS

explained that withdrawing money needed to happen at ATM machines, cautioned that electronic transfers would lock the account, and attempted to overcome account security issues by providing information and asking the other Instagram user to direct the account holder to authorize transactions.

55. CABRAL-SANTOS' post on July 17, 2023 depicted numerous PMOs fanned across the center console of a vehicle:



56. Three of the PMOs had legible serial numbers ending in 192, 941, and 952. USPS Inspectors determined that the PMOs ending in 941 and 952 were purchased on July 17, 2023, at Columbus Circle Station, 27 West 60th Street, New York, New

York, using an Eastern Bank debit card that was issued in the name H.O., of Roxbury.¹¹ The PMO ending in 192 was purchased on July 17, 2023, at Times Square Station, 340 West 42nd Street, New York, New York, using an Eastern Bank debit card that was issued in the name P.L., of Hyde Park.

57. Both H.O. and P.L.’s accounts were funded with washed check deposits from Victim 1 of West Roxbury. H.O.’s account was opened July 11, 2023, and funded by a fraudulent \$4,999 mobile check deposit. P.L.’s account was opened July 12, 2023, and funded by a fraudulent \$4,895 mobile check deposit. The debit cards for H.O. and P.L.’s accounts were used to purchase eight PMOs for \$4,000. USPIS Inspectors obtained scanned images of the redeemed money orders; four of them totaling \$2,000 were made payable to “Jairo Santos” at the CABRAL-SANTOS RESIDENCE. These orders were cashed between July 18 and 19, 2023, at the Fort Point Post Office in Dorchester.¹²

58. **July 27, 2023**—several fraudulent transactions were conducted using an Eastern Bank account in the name M.J., of Dorchester. M.J.’s account was originally opened in 2021, but he obtained a new debit card on July 26, 2023. M.J.’s account was funded by a fraudulent \$4,202.01 mobile deposit of a washed check that belonged to Victim 2 of Wellesley. According to Victim 2, they regularly mailed checks at the Grove

¹¹ All the account holders’ names have been abbreviated in this affidavit, regardless of whether they may be a co-conspirator.

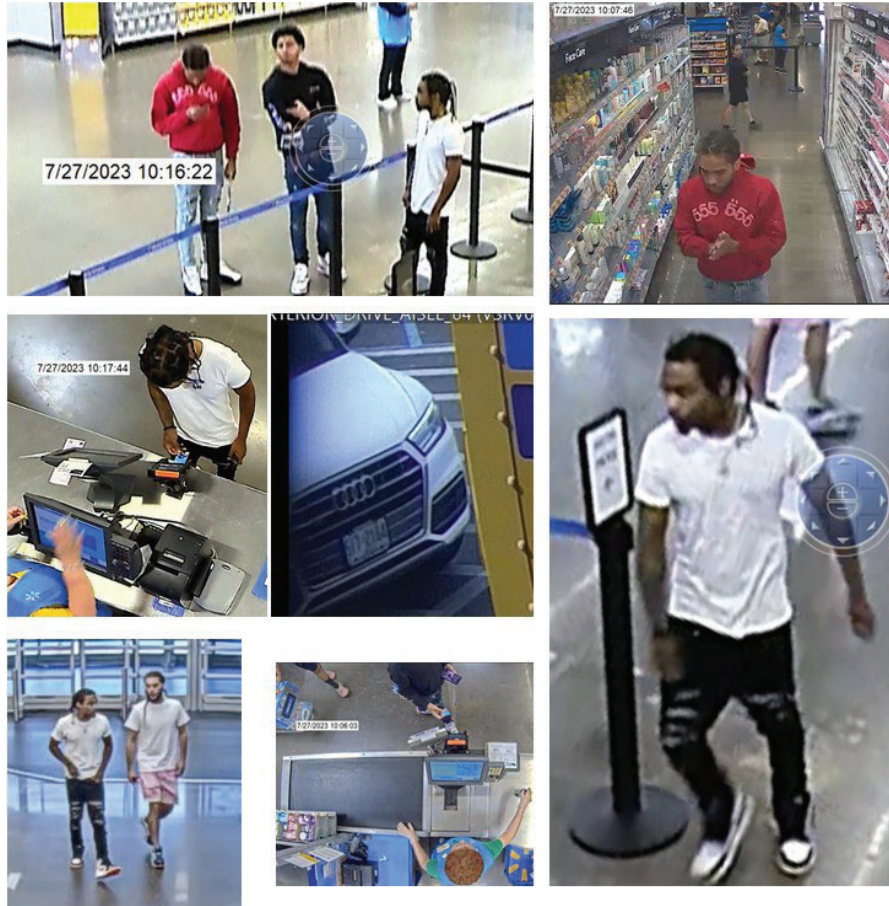
¹² I have learned from USPIS Inspectors that when a PMO is cashed at a USPS location, the clerk verifies the payee’s ID and writes the ID number on the money order. PMOs are also endorsed by the payee on the back, like a check. In all the scanned images of the PMOs paid to CABRAL-SANTOS, his Massachusetts license number was hand-written on the front, and there was a signature or initials on the back, leading me to believe that CABRAL-SANTOS cashed them.

Street Post Office in Wellesley. They did not make the check payable to M.J. M.J.'s debit card was then used for the following on July 27, 2023: ATM withdrawals in Brooklyn, New York at 3:14 a.m., a purchase of \$1,500 in PMOs at a post office in Fort Lee, New Jersey at 9:34 a.m.,¹³ and attempted transactions at a Wal-Mart in North Bergen, New Jersey between 10:06 a.m. and 10:20 a.m.

59. Investigators obtained photographs from Wal-Mart Asset Protection for the transactions on M.J.'s debit card. Screenshots of closed-circuit television ("CCTV") depicted BAEZ, CABRAL-SANTOS, MATOS, and MILLER in the store. According to Asset Protection, both BAEZ and MILLER attempted to conduct transactions using M.J.'s debit card based on surveillance and store records. Asset Protection identified the vehicle they arrived in as the White Audi. M.J.'s Eastern Bank debit card was later recovered from BAEZ's vehicle when he was arrested by WPD on July 31, 2023. That arrest is detailed later in this affidavit.

60. Images from Wal-Mart depict the White Audi, MILLER (white shirt, black pants), CABRAL-SANTOS (pink shorts), MATOS (red sweatshirt), and BAEZ (dark sweatshirt with blue emblem on sleeve):

¹³ The \$1,500 worth of PMOs that were purchased with M.J.'s card was ultimately made payable to H.T., of Brockton. These PMOs were cashed by H.T. at the Brockton Post Office on July 29, 2023. Upon a review of H.T.'s criminal history, I learned that in 2019, H.T. was convicted in Suffolk Superior Court for carrying a loaded firearm without a license.

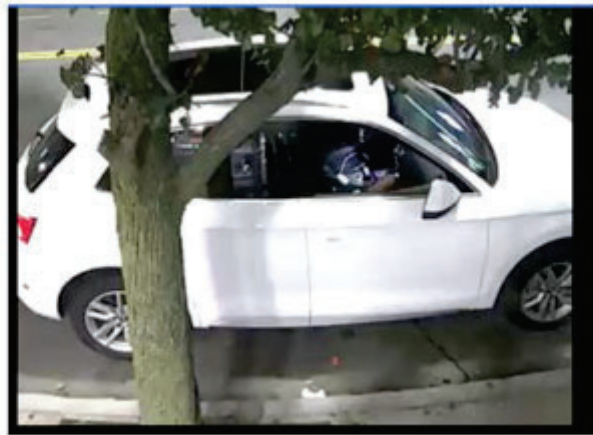


61. **July 27, 2023**—an Eastern Bank account was opened in the name G.N., of Brockton. On July 28, 2023, at 4:21 p.m., the phone number and email on the account were changed to (347) 544-6597 and username4pf@gmail.com. As noted in above, the number (347) 544-6597 is the verified phone number for CABRAL-SANTOS’ Instagram account. Subscriber information for username4pf@gmail.com lists the name as “Jays Santos” and the recovery phone number as (347) 544-6597. I believe CABRAL-SANTOS took control of G.N.’s Eastern Bank account the day after it was opened using CABRAL-SANTOS’s contact information.

62. **July 28, 2023**—G.N.’s Eastern Bank account was subsequently funded with two mobile deposits of fraudulent checks. On July 28, at 5:08 p.m., a forged check belonging to Victim 3 of Wellesley was mobile deposited into the G.N. account, payable

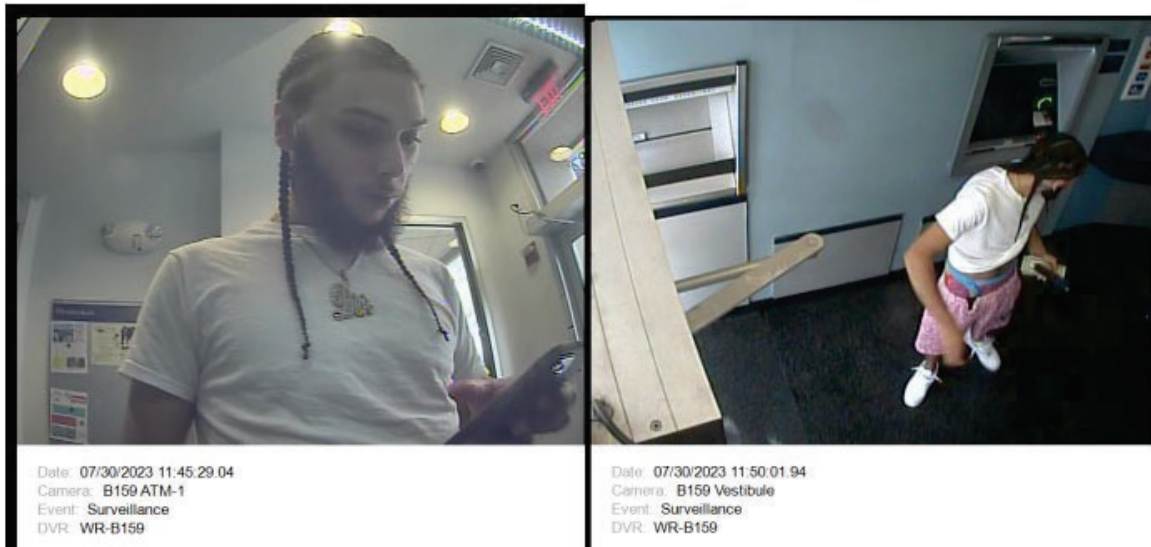
in the amount of \$5,000. This check was a complete forgery, having been computer printed and not washed. Victim 3 is a business and has been the victim of other stolen checks in other incidents around Massachusetts.

63. **July 29, 2023**—between 4:19 a.m. and 4:21 a.m., a Black male wearing a green sweatshirt with a distinct logo on the back withdrew \$740 from G.N.'s account at an ATM in Jamaica Plain after arriving in a white Audi Q5 SUV. Investigators were unable to see the license plate of the vehicle. The subject does not appear to be alone in the Audi.



64. **July 30, 2023**—between 11:45 a.m. and 11:49 a.m., CABRAL-SANTOS withdrew \$740 from G.N.'s account at the same Eastern Bank ATM in Jamaica Plain.

CABRAL-SANTOS arrived in a white Audi SUV. CABRAL-SANTOS wore pink patterned shorts and a diamond encrusted pendant spelling “Dior,” both of which have been featured on his Instagram page. Still images of CABRAL-SANTOS making that withdrawal are depicted below.



65. Hours later, an individual appearing to be CABRAL-SANTOS made approximately \$1,500 worth of purchases at Wal-Mart store locations in Avon and Walpole. Video was not available from Walpole due to the system’s retention period. CCTV images were available from Wal-Mart in Avon and depicted a male with braids, in a white shirt, pink shorts, and a large necklace pendant, consistent in appearance with CABRAL-SANTOS.



66. **July 31, 2023**¹⁴—at 12:24 p.m., G.N.’s bank account logged into the bank website from the Comcast IP address 24.218.59.164, which was leased to the CABRAL-SANTOS RESIDENCE by CABRAL-SANTOS’ mother.

67. **July 31, 2023**—G.N.’s debit card was used to purchase four PMOs totaling \$1,620 at USPS locations in Dorchester and Milton. As of December 7, 2023, two of those money orders have been redeemed by “Jairo Santos at 11 Browning Ave, Boston.” 11 Browning Avenue in Boston is the CABRAL-SANTOS RESIDENCE. USPIS Inspectors obtained scanned images of both PMOs, which were endorsed by CABRAL-SANTOS and had a hand-written phone number on the back: (347) 544-6597, CABRAL-SANTOS’s phone number.

68. **July 31, 2023**—at 7:58 p.m., a washed check belonging to Victim 4 of Brookline in the amount of \$4,500 was mobile deposited into G.N.’s account. Victim 4 informed investigators that they placed several checks at a USPS collection box in

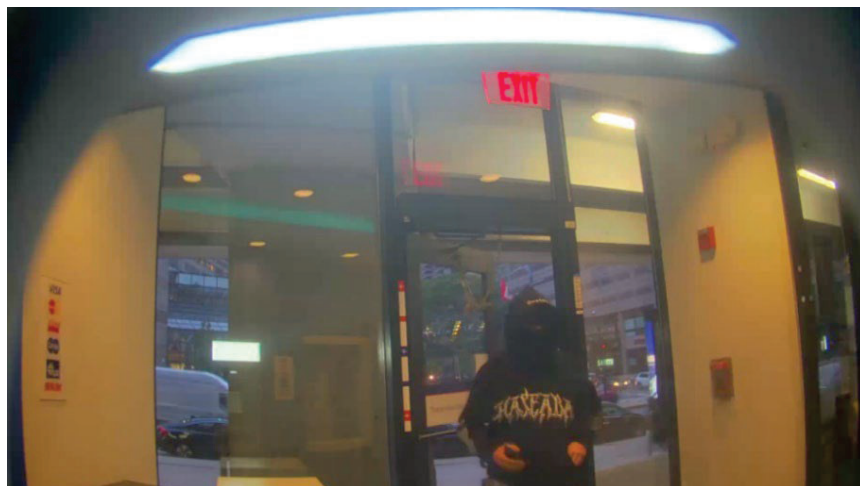
¹⁴ As noted above, the Wellesley Square Post Office mail theft occurred on July 31 at approximately 3:50 a.m., involving the White Audi.

Chestnut Hill, Massachusetts on or about July 29, 2023. They did not make the check payable to G.N. In total, Eastern Bank lost more than \$5,700 from G.N.'s account.

69. **August 4, 2023**—at 7:55 p.m., a masked subject deposited another washed check belonging to Victim 4 into an Eastern Bank account in the name “F.R.” at an ATM at 155 Dartmouth Street in Boston, funding the account with \$6,500. Victim 4 confirmed to law enforcement that they did not write a check to F.R. either. On August 4, at 7:39 p.m., the phone number and email address on F.R.'s Eastern Bank account changed to (929) 685-4291 (the phone number CABRAL-SANTOS provided to the representative from Posh) and username4pf@gmail.com (the email address associated with CABRAL-SANTOS). T-Mobile records for the (929) 685-4291 number documented voice and text communications between CABRAL-SANTOS and F.R. between August 4, 2023, and August 21, 2023.¹⁵

70. Over the next three days, more than \$5,700 was successfully drawn from the account in ATM withdrawals and transactions. The subject who deposited the washed check was wearing an identical sweatshirt as the subject who appeared on CCTV footage stealing mail in Wellesley on July 1, 2023. As stated above, an identical sweatshirt was seized from the CABRAL-SANTOS RESIDENCE on February 27, 2024. I believe that CABRAL-SANTOS deposited Victim 4's stolen check into F.N.'s account on August 4, 2023. A photo from the ATM deposit and comparison photos are below:

¹⁵ CABRAL-SANTOS communicated with F.R. at the same phone number that Eastern Bank had for F.R. F.R. has no criminal history.



Date: 08/04/2023 19:53:20.69
Camera: B157 ATM T3731572
Event: Surveillance
DVR: Back-Bay-B157



7/1/23 Mail Theft Subject



2/27/2024 Sweatshirt seized from CABRAL-SANTOS RESIDENCE

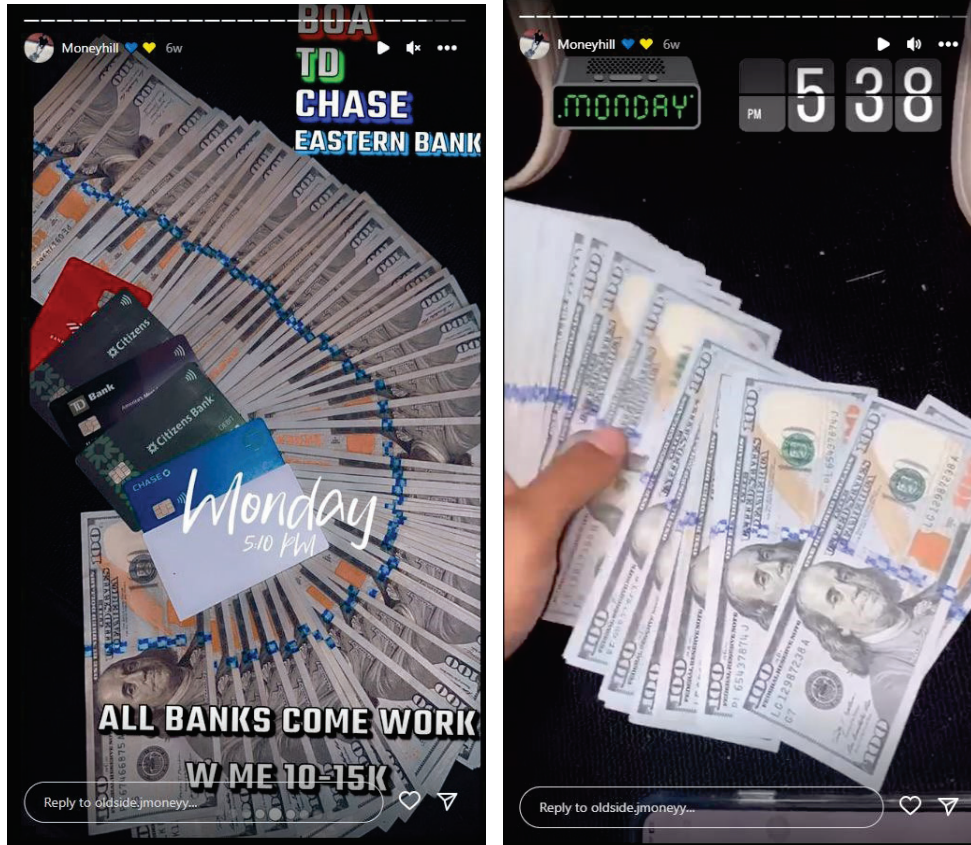
b. MATOS a/ka Jmunna

71. MATOS' Instagram username is "ym.jmoneyy."¹⁶ I believe this is MATOS' account because: (1) the account displayed numerous photos of MATOS; (2) the subscriber information included MATOS' date of birth; and (3) MATOS provided the phone number (857) 675-0140 to others in direct messages, which was associated with the Apple ID oldside.jmoneyy@icloud.com and subscribed to "Jiovanny Matos." According to T-Mobile, the service for (857) 675-0140 started on July 10, 2023, and continued through October of 2023. The call records indicated the phone was used regularly and in communication with other TARGET INDIVIDUALS, such as MILLER, ROMERO DELGADO, and RIOS-FRANCO.

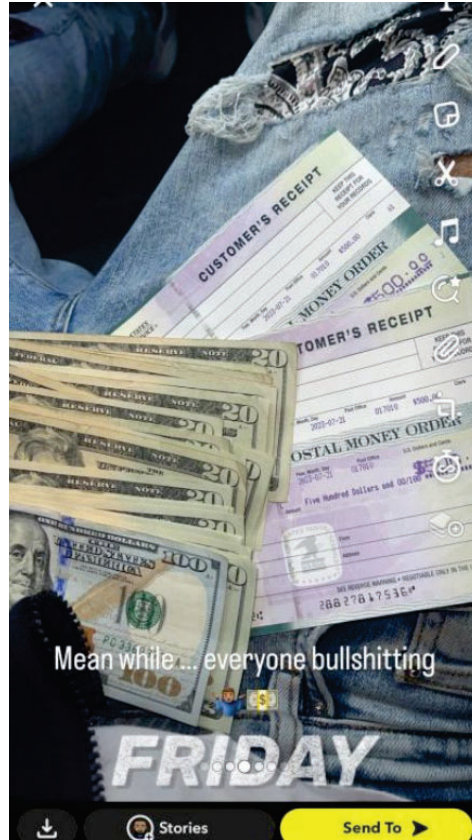
72. MATOS' page included public story posts from mid-July titled "Money Hill,"¹⁷ which included a solicitation for the recruitment of bank account holders:

¹⁶ MATO's account was formerly named "oldside.jmoneyy" and re-named in September of 2023. I am aware that Instagram users can change their name at any time.

¹⁷ As noted above, "Money Hill" is a nickname for the Mission Hill Gang.



73. Throughout July and August of 2023, MATOS posted on his Instagram account photos of PMOs, cash, and bank cards to recruit account holders. MATOS' Snapchat post from July 21, 2023, depicted cash and three PMOs, including one with a legible serial number ending in 536 (depicted below).



74. USPIS Inspectors learned that this PMO and two others were purchased on July 21, 2023, at a Framingham Post Office¹⁸ using an Eastern Bank debit card in the name of W.B.. W.B.'s account was funded by a \$3,335.01 mobile deposit of a washed check belonging to Victims 5 of Newton. Victim 5 reported that they most likely mailed this check and other checks at a USPS collection box outside of the Newton Centre Post Office. Two of these PMOs were made payable to W.B.; one was cashed by BAEZ at a Framingham Post Office later that day.

75. Beginning on June 29, 2023, MATOS engaged in a direct message conversation with an Instagram user about defrauding bank accounts. The conversation

¹⁸ MATOS resided at the BAEZ RESIDENCE during the summer of 2023. Private messages from MATOS' Instagram account from that time period suggest that MATOS was dating BAEZ's mother, who also resided at that address in Framingham.

started when the user messaged MATOS stating, “*Wassup letssss do suuum watchu fucking with ?*” MATOS replied, “*All banks tap in gang I’ll get you right on my seed.*” The user then stated, “*I got 2 td and chase.*” During the conversation MATOS stated, “*N****s can get crazy w em you just gotta be out here I can’t leave the state gang my brace.*” This comment indicated that MATOS was wearing a court-ordered GPS monitoring device and could not leave Massachusetts. I believe that MATOS encouraged this user to come to Massachusetts so that MATOS could recruit the user into this card cracking conspiracy.¹⁹ In response to a question about “Chase,” which I believe to be a reference to Chase Bank, MATOS replied “*If it’s old its valid a new one can’t really get crazy,*” reflecting his knowledge that established Chase accounts can be exploited for more money, whereas newer accounts are more closely scrutinized.

76. **July 3, 2023**— On July 3, MATOS opened a checking account at Eastern Bank at 1906 Dorchester Avenue, Boston. MATOS provided to the bank the address of the MATOS RESIDENCE (101 Walnut Avenue, Boston, Massachusetts), a contact number of (617) 485-4276, and an email address of oldside.jmoneyy@gmail.com.

77. **July 6, 2023**—MATOS’ account was funded by a fraudulent \$5,000 mobile deposit of a washed check belonging to Victim 6 of Needham. Victim 6 reported that they mailed the check at a USPS collection box outside of the Needham Heights Post Office on July 1, 2023. Victim 6 confirmed they did not write the check to MATOS.

¹⁹ MATOS’ GPS was removed following his conviction in West Roxbury District Court on July 20, 2023. On July 22, 2023, he sent the user, “*I’m off the bracelet bitch.*” Days later, on July 27, 2023, as referenced above, MATOS appeared on CCTV at the Wal-Mart with BAEZ, CABRAL-SANTOS, and Miller.

The check was deposited at 3:18 p.m. and Eastern Bank records show the deposit came from Comcast IP address 24.91.114.222, which was leased to the BAEZ residence.

78. **July 7, 2023**—MATOS’ account made a \$500 Zelle payment to “Brandon Baez” and withdrew \$840 from the account.

79. **July 7, 2023**—MATOS’ debit card was used to purchase three \$500 PMOs at a Post Office in Framingham. All three of these PMOs were then cashed the same day by MATOS according to USPS records. USPIS Inspectors obtained scanned images of the PMOs, which included MATOS’ address as the BAEZ RESIDENCE. One of these PMOs, ending in 212, was featured along with two others in a July 7, 2023, post on MATOS’ Instagram page:

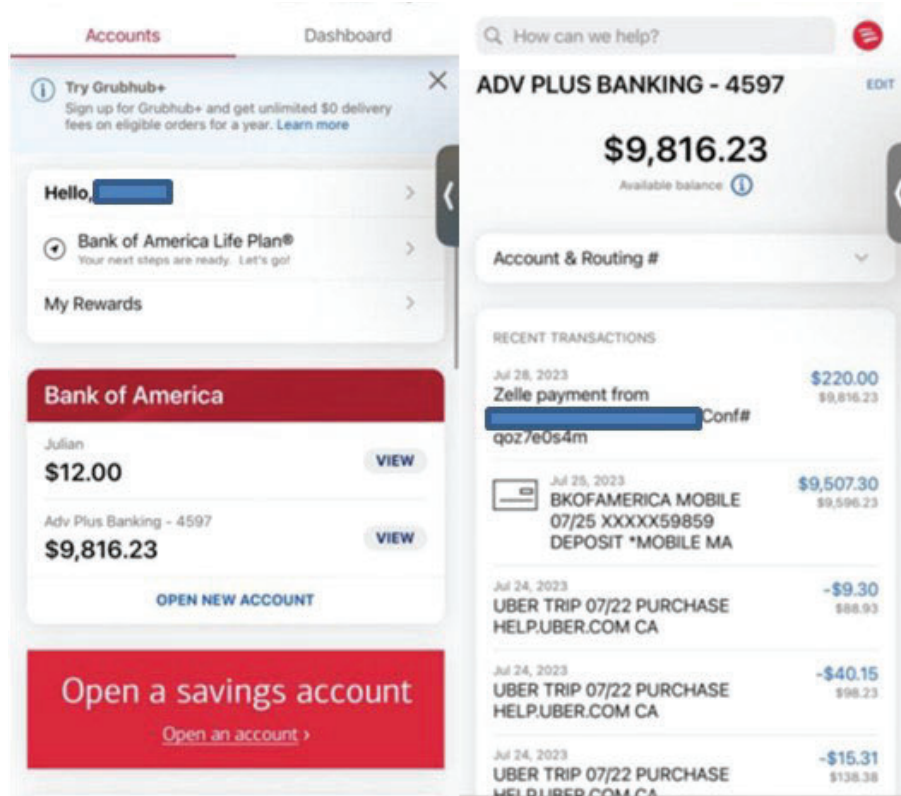


c. MILLER, a/k/a “Trinny”

80. **July 25, 2023**—a washed check in the amount of \$9,507.30 belonging to Victim 7 was mobile deposited into a Bank of America account in the name “J.O.” Victim 7 reported mailing the check in a USPS collection box outside the Grove Street Post Office in Wellesley on July 18, 2023. Victim 7 confirmed they did not write the check to J.O. Screen captures of J.O.’s Bank of America account were posted to MATOS’ Instagram account on August 1, 2023 and August 3, 2023, noting the \$9,507.30 fraudulent check deposit on July 25, 2023. The last four digits of the account number and all the transactional activity in the screen capture are identical to transactions reflected on J.O.’s bank statements.

81. The account holder, J.O., is currently under indictment in Middlesex Superior Court for trafficking controlled substances, including cocaine, fentanyl, and methamphetamine. During July of 2023, J.O. had significant phone communications with MILLER. For example, on July 20, 2023, J.O. sent a username, password, and four-digit PIN to MILLER. On July 25, 2023, J.O. stated *“If you got a picture of my debit card and send it to me please trying to do something,”* indicating the MILLER was in possession of J.O.’s debit card. On July 28, 2023, J.O. sent MILLER a screen capture of his Bank of America online account reflecting a deposit hold on the washed check, along with the message *“Did I fuck up??”* MILLER instructed J.O. not to use the account anymore until the check cleared.

82. Two screen captures of J.O.’s bank account, as depicted in MATOS’ Instagram story, are below:



83. **August 3, 2023**—J.O.’s Bank of America account logged a Comcast IP address 24.91.114.222, which was leased to the BAEZ RESIDENCE, and which was also logged by MATOS’ Instagram account, Apple ID, and Eastern Bank account in July and August of 2023.

84. **July 28, 2023 to August 1, 2023** – J.O.’s Bank of America account logged an IP address 75.69.229.173, which was leased to the MILLER RESIDENCE, 34 New Whitney Street, Boston, Massachusetts. MILLER was living at this address at the time of his arrest on October 24, 2023. As stated above, investigators sought and obtained a search warrant for the contents of MILLER’s cellphone following his arrest.

85. MILLER’s phone contained communications with MATOS at (857) 674-0140 about the card cracking scheme. On October 19, 2023, MILLER reached out to MATOS and inquired where he was, MATOS replied he was at his “crib” and provided

the address “51 blue hill Ave” (which is MATOS’ former residence) for MILLER to pick him up. MILLER told MATOS, “*I need u write on dis grub u got good hand writing.*” Based on my training and experience and my review of MILLER’s cellphone, I know that “grub” is a slang term for a check. I believe this conversation was in reference to MATOS writing on a stolen, washed check in order for it to be deposited to an account. On October 20, 2023, the conversation continued:

MILLER: *Dat shii clipped* [clipped is a reference for the bank placing a hold on the check]
MATOS: *what slip was it & bro Tds [TD Bank] don’t clip the next day bro. if they didn’t lock the card then idk cause that shit doesn’t clip same day or next.*
MILLER: *that was a citizens.* [Citizen’s Bank]
MATOS: *Breezo said Bc it’s a freshie he told jewz no & he went to you [reminding MILLER that BAEZ told them that the deposit was held because it was a new account].*

86. **July 19, 2023**— On July 19, 2023, an Eastern Bank account was opened in the name F.W. of Roxbury.

87. **July 21, 2023**—F.W.’s Eastern Bank account was subsequently funded with a mobile deposit of a fraudulent check. On July 21, 2023, a forged check belonging to Victim 12 of Newton was mobile deposited into the F.W. account, payable in the amount of \$4,903.12. Victim 12 reported mailing this check and other checks in a USPS collection box outside the Newton Centre Post Office. Victim 12 did not make the check payable to F.W. In total, Eastern Bank lost \$2,347.39 from F.W.’s account.

88. **July 19, 2023 and July 22, 2023**—F.W.’s bank account logged into the bank website from the Comcast IP address 24.91.114.222, which was leased to the BAEZ RESIDENCE.

89. **July 24, 2023**—F.W.’s debit card was used to purchase three PMOs totaling \$1,506. These PMOs were cashed on July 24, 2023 at PLS Cash Checking in Boston. All three were made payable to MILLER at the MILLER RESIDENCE. PLS Cash Checking provided the following image and ID that were recorded for the redemption:

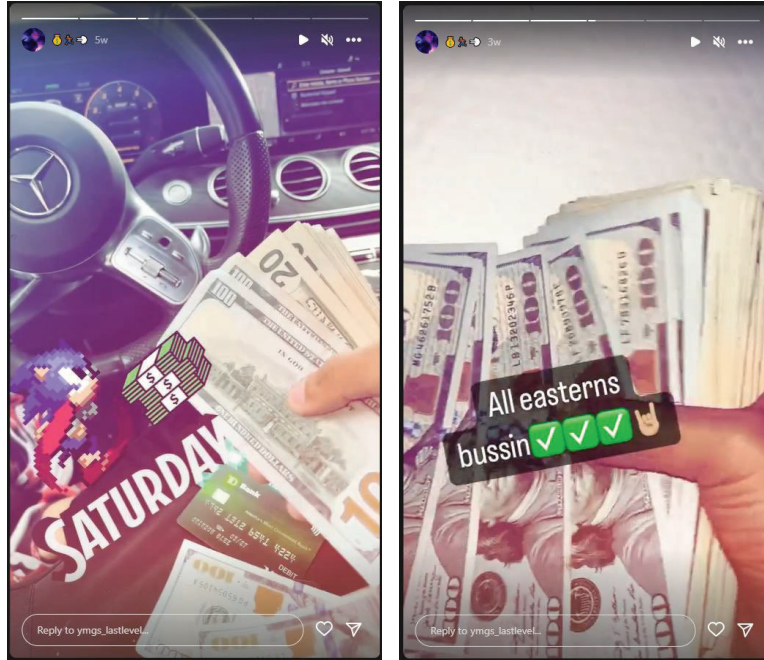


MILLER cashing PMOs that were purchased using F.W.’s account on 7/24/23

d. ROMERO DELGADO a/k/a Jaydo

90. ROMERO DELGADO’s Instagram username is “ymgs_lastlevel.” The verified phone number associated with the account was (857) 396-3119, and the email address was josmanromero277@gmail.com. The phone number was subscribed to ROMERO DELGADO’s mother. T-Mobile records for the account recorded communications with TARGET INDIVIDUALS including BAEZ, MATOS, and MILLER, as well as with Citizens Bank, SVB Private, Eastern Bank, Bank of America, and Rockland Trust.

91. ROMERO DELGADO’s Instagram account includes public stories depicting cash, a TD Bank card in the name “Brandon Baez,” and a clear solicitation for Eastern Bank account holders. These posts were made in June and July of 2023:



92. **June 29, 2023**—ROMERO DELGADO opened an Eastern Bank checking account. He provided the home address of 212 Waldemar Avenue, Apartment 423, East Boston. ROMERO DELGADO provided the phone number (857) 396-3119 and email josmanromero277@gmail.com to Eastern Bank. ROMERO DELGADO deposited a washed \$3,406 mobile check to his account. The check belonged to Victim 8 of Waban, who mailed two checks by handing them to a mail carrier on June 24, 2023. Victim 8 confirmed they did not address any check to ROMERO DELGADO.

93. **June 30, 2023**—at 1:12 p.m., ROMERO DELGADO called Eastern Bank after being locked out of his online banking account. The call was recorded and appeared on the T-Mobile records for ROMERO DELGADO’s number (857) 396-3119. ROMERO DELGADO verified his identity by providing his social security number.

When the customer service representative asked ROMERO DELGADO to verify a recent transaction on the account, ROMERO DELGADO stated he had just made a mobile deposit of approximately \$3,400. ROMERO DELGADO stated that the check was from a settlement and that he had the check in his possession. The representative explained that the account had been locked because the mobile deposit was suspected to be fraudulent and that ROMERO DELGADO would have to go to a branch location to discuss the check and have his account unlocked. ROMERO DELGADO asked the representative, “*Is there anything else I should know before walking-in?*” The representative told him to make sure he had identification with him. ROMERO DELGADO made no further attempts to rectify the hold on this deposit.

94. On June 30, 2023, ROMERO DELGADO’s bank account logged into the bank website from the Comcast IP address 24.91.114.222, which was leased to the BAEZ RESIDENCE.

95. **July 3, 2023**—ROMERO DELGADO opened a TD Bank account. To open the account, ROMERO DELGADO provided a Massachusetts identification card, a phone number of (857) 396-3119, an email address of josmanromero277@gmail.com, and a home address of 212 Waldemar Avenue, Apartment 423, Boston. ROMERO DELGADO has tattoos of a Milwaukee Brewers symbol on his left hand and a cross with rosary beads on his right hand. His tattoos are visible on the CCTV video at TD Bank at 1333 Boylston Street in Boston.²⁰ Still images of ROMERO DELGADO at the TD Bank on July 3, 2023 are below:

²⁰ As noted above, both the Milwaukee Brewers “M” logo and the term “DBO Gang” are references to the Mission Hill Gang.



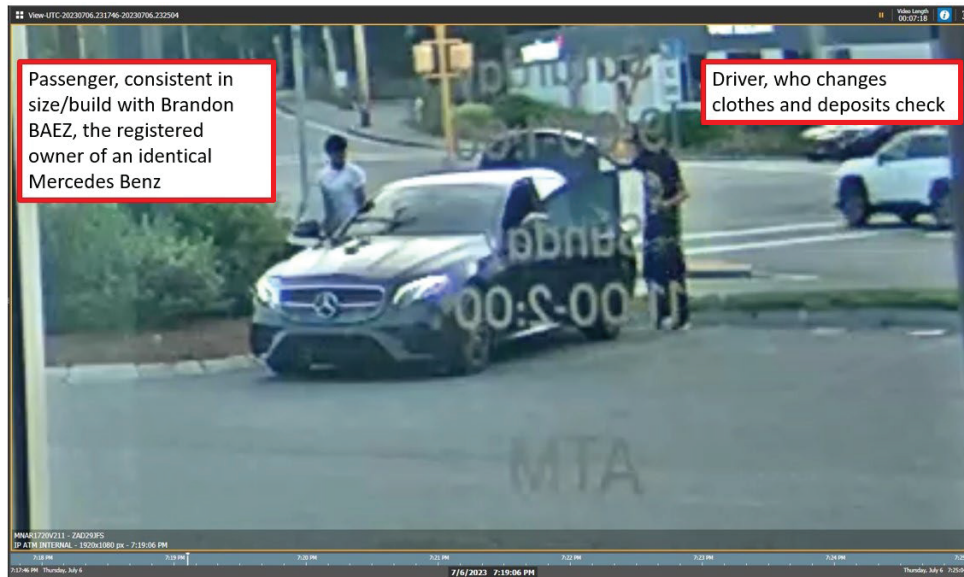
96. **July 6, 2023**—at 7:19 p.m., ROMERO DELGADO deposited a washed check for \$9,802 belonging to Victim 9 of Needham to his TD Bank account.²¹ Victim 9 mailed the check in early July 2023. Victim 9 confirmed they did not write the check to ROMERO DELGADO.

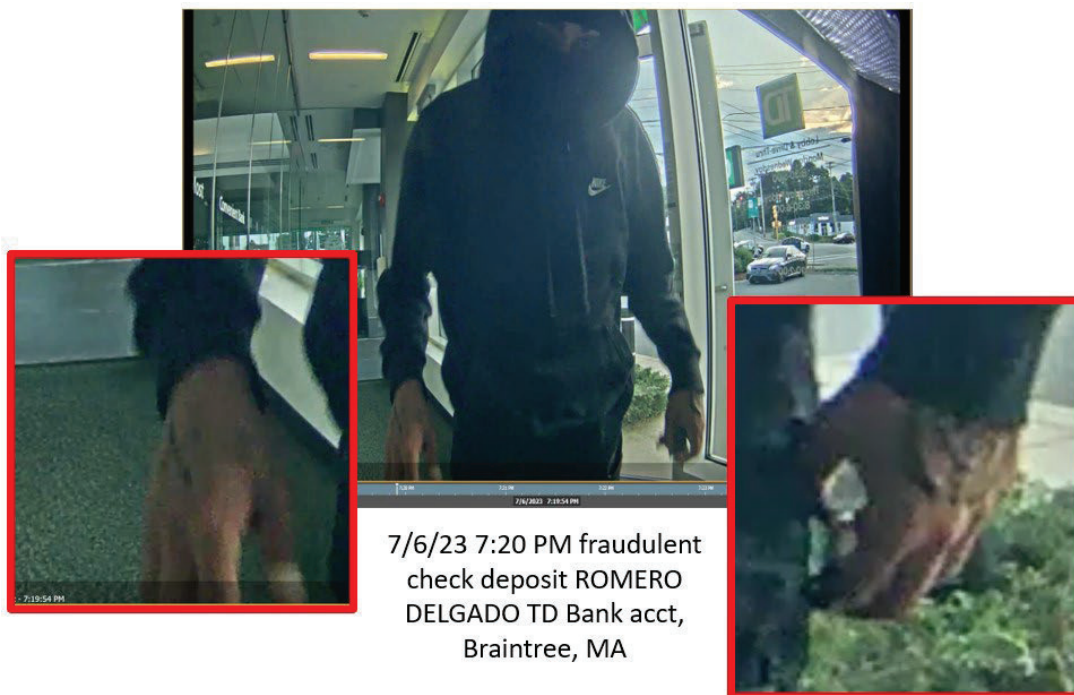
97. CCTV video of the fraudulent check deposit in Braintree depicted two subjects arriving at the bank in a black Mercedes sedan that is consistent in appearance with BAEZ’s vehicle.²² Once parked, the driver and passenger exited the BAEZ’s

²¹ Eastern Bank investigators informed agents that since this check was drawn from Victim 9’s account, additional forged checks bearing Victim 9’s account information have appeared at some of their branches. In similar investigations, agents have learned that subjects who steal checks from the mail often photograph them and re-sell the account information to profit more from the scheme. Stolen account information is then used to produce forged checks in attempts to draw money from victims’ accounts. While conducting court authorized searches of cell phones seized from mail theft offenders, agents have seen advertisements for photos of stolen checks for sale on social media platforms. In fact, a photograph of Victim 9’s check, made payable to ROMERO DELGADO, was found in BAEZ’s private Instagram messages.

²² Investigators were unable to see the license plate.

vehicle and accessed the trunk. The passenger's appearance is consistent with BAEZ. The driver then put on a balaclava-style facemask and approached the lobby ATM machine, where he deposited Victim 9's washed check. The masked subject that made the deposit has visible tattoos, including a cross on his right hand and a large emblem on his left hand. These tattoos are consistent with ROMERO DELGADO's tattoos. I believe ROMERO DELGADO is the individual who made the fraudulent deposit into his account.





98. Following the check deposit, online banking logs for ROMERO DELGADO’s TD Bank account recorded numerous T-Mobile IP addresses, indicating a mobile device on T-Mobile’s network was used to access the account. ROMERO DELGADO’s phone number was a T-Mobile number. The account was also accessed using the Comcast internet network from the BAEZ RESIDENCE on July 12, 2023, at 3:14 a.m.

99. **October 16, 2023**—a fraudulent check for \$7,750.22 was deposited at an ATM in Newton into a Bank of America account under the name “F.R.” of Providence, Rhode Island. F.R. opened the account on January 11, 2023, in Providence. The check belonged to Victim 10 of Needham, who mailed four checks in a USPS collection box outside the Needham Post Office on October 9, 2023. Two of those checks were later altered and made payable to J.B. for \$18,605.22 and F.R. for \$7,750.22. Victim 10 confirmed that they did not write any checks payable to J.B. or F.R.

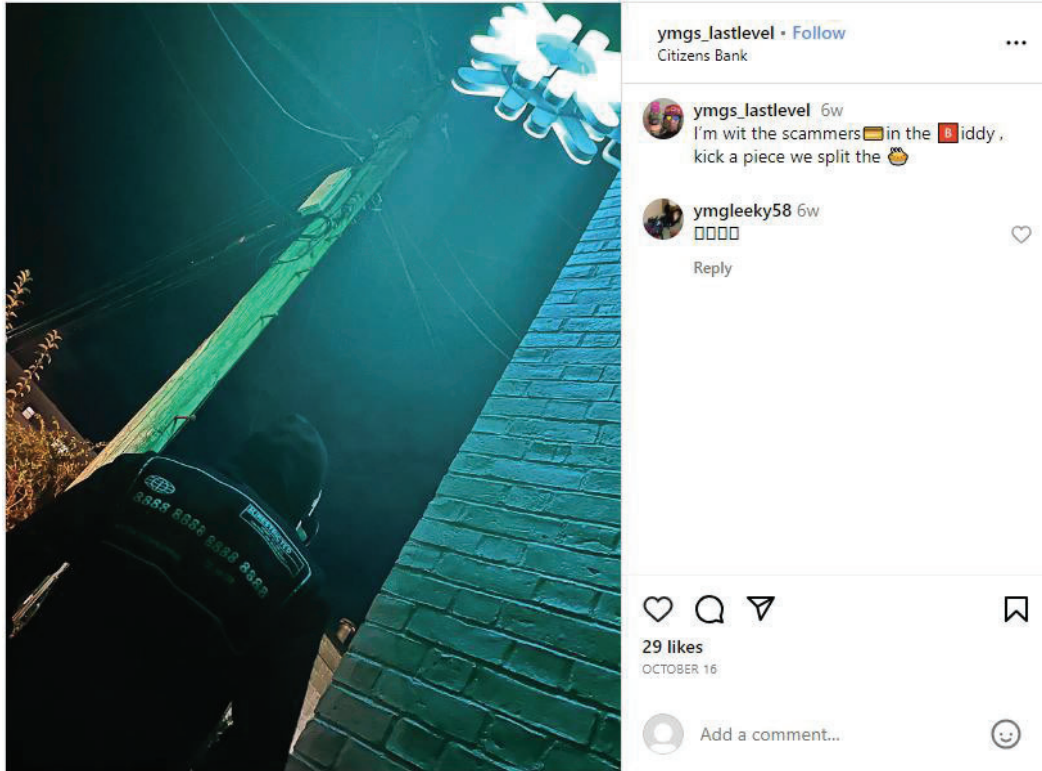
100. Needham Police Detectives obtained CCTV from the Bank of America ATM, which depicted two masked subjects entering the ATM lobby while one deposited the check into F.R.'s account. The subject who physically made the deposit is currently unidentified: he wore a black balaclava face mask, black hooded sweatshirt with a Nike logo, black sweatpants, and black/yellow Nike Air Jordan sneakers. The subject approached the ATM with his cell phone and a debit card in hand. This subject is consistent in size/build and dress (even the yellow/black sneakers) with the subject who was captured on camera stealing mail outside the Wellesley Square Post Office on October 9, 2023, at 3:15 a.m. The subject in the ATM lobby is below, followed by a photo of the subject at the Wellesley Post Office on October 9.



101. The second subject who entered the ATM lobby was ROMERO DELGADO. His hand tattoos are visible, including the cross on his right hand and Milwaukee Brewers logo on his left. He wore a black balaclava-style face mask, a black Milwaukee Brewers logo on his left. He wore a black balaclava-style face mask, a black “Restricted Money” sweatshirt, ripped jeans, and gray Nike Air Force One sneakers. He can be seen typing on his phone the entire time he is in the ATM lobby:



102. The same day as the above deposit at Bank of America, October 16, 2023, ROMERO DELGADO posted a photo to his Instagram account of an individual, similar to his size and build, wearing the same sweatshirt, standing underneath a Citizens Bank sign. The post tagged “Citizens Bank.” ROMERO DELGADO commented, “*I’m wit the scammers in the Biddy kick a piece and we split the [pie emoji].*” Based on my training and experience, “kick a piece” is a reference to providing a debit card.



e. BRIMAGE a/k/a Big Body Benz

103. BRIMAGE’s Instagram username is “bigbodybenzi.” The account contained numerous images of BRIMAGE, and subscriber information listed BRIMAGE’s date of birth and the email address brimagetyrone@gmail.com.

104. On **July 19, 2023**, an Eastern Bank account was opened by A.C.²³ A.C. provided a T-Mobile phone number of (774) 520-6850 and 288 Dudley Street, Apartment C, Boston as the home address.²⁴ From July 22, 2023 to July 25, 2023, A.C.’s online

²³ A.C. has 10 arraignment entries on her adult BOP record in Massachusetts, including conspiracy, possession, and uttering a counterfeit note, larceny and possession/uttering a counterfeit note, and discharging a firearm/assault with a dangerous weapon; all of these cases have been continued without finding or dismissed.

²⁴ 288 Dudley Street, Apartment C is BRIMAGE’s former address while he was dating A.C.

banking account sporadically logged the Comcast IP address 73.218.226.108, which was leased to BRIMAGE with a service and billing address at 288 Dudley Street.

105. On **July 24, 2023**, at 1:32 p.m., BAEZ (Instagram username “breezo617”), sent direct messages to BRIMAGE stating, “*lets do that eastern.*” I believe BAEZ solicited BRIMAGE to conduct a card cracking scheme using an Eastern Bank account.

106. **July 24, 2023**—at 7:25 p.m., a washed check belonging to Victim 11 made payable to A.C. for \$3,032.40 was mobile deposited to A.C.’s Eastern Bank account. Victim 11 reported that they mailed this check in a USPS collection box outside the Grove Street Post Office in Wellesley on July 19, 2023. Victim 11 confirmed they did not write the check to A.C. The check was deposited using an AT&T IP address. AT&T phone number (617) 599-0936 is subscribed to BRIMAGE. As stated above, A.C.’s cell provider is T-Mobile.²⁵ I believe that BRIMAGE mobile deposited Victim 11’s stolen check into A.C.’s bank account.

107. **July 25, 2023**—at approximately 4:15 a.m., two masked subjects entered the Eastern Bank ATM at 1413 Tremont Street, Boston and withdrew \$200 from A.C.’s account, which had been funded by the fraudulent check deposit. According to Eastern Bank, limited funds were available for withdrawal because the victim’s check had a non-local routing number. The subjects who conducted the withdrawal from A.C.’s account arrived in a black Mercedes sedan with AMG wheels and dark windows, consistent with

²⁵ AT&T records for BRIMAGE’s number recorded near-daily communication with A.C.’s contact number in July and August of 2023, corroborating the two had a relationship.

BAEZ's vehicle.²⁶ A still image of the vehicle outside the Eastern Bank ATM is depicted below:



Date: 07/25/2023 04:11:45.66
Camera: 12 B169 EXTERIOR FRONT
Event: Surveillance
DVR: EDGEVR79201

108. One of the subjects at the ATM had the same stature/size as BAEZ, and historical cell-site location information obtained by search warrant for BAEZ's phone indicated it was likely in the general area of Tremont Street when the transaction was conducted.²⁷ Prior to the transaction, at 3:30 a.m. and 3:58 a.m., BAEZ's phone records recorded communication with (617) 599-0936, the phone number subscribed to BRIMAGE.

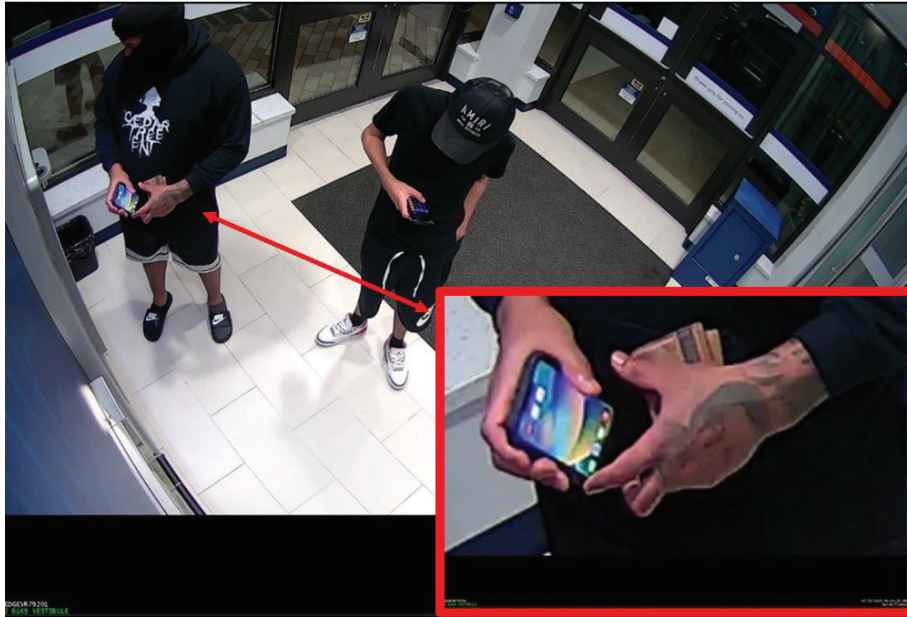
109. The second subject at the ATM—a larger, heavier male—had a distinct tattoo of a face on the outside of his left hand with a pattern extending to his wrist. This

²⁶ Investigators were unable to see the rear license plate.

²⁷ BAEZ's phone records also showed that it was within the vicinity of 288 Dudley Street prior to and after the fraudulent ATM activity. I believe that BAEZ picked up and dropped off BRIMAGE at BRIMAGE's former residence to make this ATM withdrawal.

tattoo is identical to a tattoo visible on BRIMAGE's hand on his Instagram page. I believe BRIMAGE made the fraudulent withdrawal from this ATM.

110. An image of the subjects, BRIMAGE (left) and BAEZ (right), is below:



111. Below is a close-up image of BRIMAGE's tattoo from an Instagram page where BRIMAGE was tagged "bigbodybenzi" by MILLER.²⁸

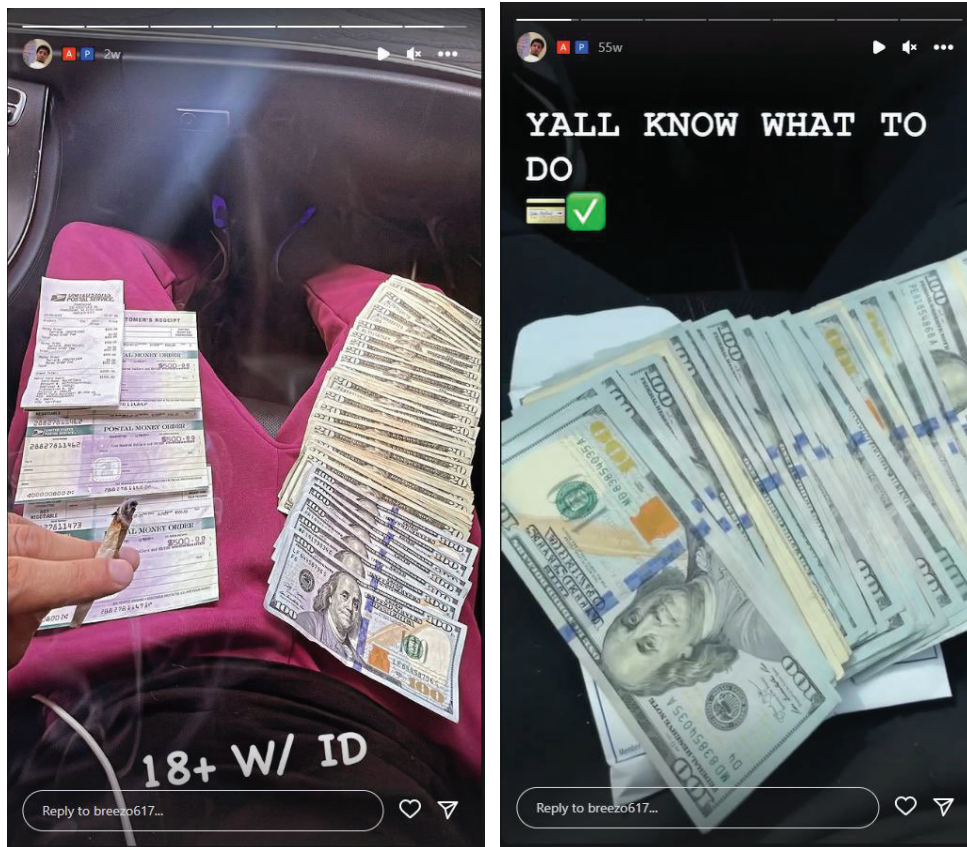
²⁸ Notably in this picture, MILLER wore a t-shirt referencing "DBO Gang," which is another name for the Mission Hill Gang. This exact logo was seen on a sweatshirt worn by ROMERO DELGADO as depicted above.



f. BAEZ a/k/a Breezo

112. BAEZ uses the Instagram username “breezo617.” The email address associated with the account was brandonbaez4life@gmail.com.²⁹ BAEZ’s publicly facing page includes numerous story posts of cash, PMOs, and bank envelopes. These posts were dated as recently as October of 2023 and as far back as 2022. Two such public posts are below, including an apparent solicitation for bank accounts:

²⁹ BAEZ’s account was created in 2014. The phone number associated with this account was not the same number that BAEZ provided to WPD in booking during his July 31 arrest.



113. A direct message conversation between “breeze617” and an Instagram user on July 26, 2023, highlighted BAEZ’s knowledge of the card cracking scheme. BAEZ stated, “*easy bread unc all we gotta do is have people open up a eastern bank account we cashing out the next day.*”

114. On July 17, 2023, BAEZ sent a photograph of an Eastern Bank check to another Instagram user. The check belonged to Victim 9 of Needham, who mailed the check in early July 2023. In the photograph, the check was made payable to “Josman Romero” for \$9,802 and had a TD bank debit card number written in the memo line. As discussed above, ROMERO DELGADO deposited this check to his account on July 6, 2023. I believe that BAEZ was advertising the card cracking scheme and/or distributing the check and its account information for continued forgery and card cracking.

115. Another conversation took place beginning on August 29, 2023, between “breezo617” and a third Instagram user detailing BAEZ’s coordination in obtaining bank accounts. During the conversation, the user stated, “*bro I need bread bad for school tell me what to do and ima try an make it happen.*” BAEZ replied, “*have people walk in the bank and open up a td account.*” After discussing a payment split, the user stated he had two people that wanted to participate and that, “*one got td other got Bank of America.*” BAEZ responded, “*lets get that bank of America and td bank*” and “*9k on boa and 15k on td bank,*” referencing how much they could expect to exploit from the accounts.

116. **July 22, 2023**—between 4:09 a.m. and 4:20 a.m., two subjects conducted/ attempted cash withdrawals at the Eastern Bank ATM at 2 South Avenue in Natick. A masked subject, consistent in size/build with MILLER, entered the ATM and withdrew \$740 from an account in the name “F.W.” As discussed above, F.W.’s account had been opened on July 19, 2023, and was funded by a fraudulent \$4,903.12 mobile check deposit. The check belonged to Victim 12 of Newton.³⁰

117. Minutes after the first transaction, a subject consistent in size/build with BAEZ, entered the ATM and attempted to withdraw \$440 from an account in the name of K.B. K.B.’s account had been opened on July 21, 2022, and was funded by a fraudulent \$4,950 mobile deposit of a washed check belonging to Victim 13 of Wellesley. Victim 13 reported mailing the check on July 13, 2023. Victim 13 of Wellesley confirmed they did not write the check to K.B. Previously obtained T-Mobile records for BAEZ’s phone indicate it was likely around the Eastern Bank during this transaction.

³⁰ As discussed above, F.W.’s Eastern Bank account was also used to purchase \$1,506 worth of PMOs, all of which were made payable to MILLER.

118. Photos of individuals suspected to be MILLER (top) and BAEZ (bottom) at the ATM are below:



Date: 07/22/2023 04:15:09.58
Camera: 1 B371 WALK UP ATM
Event: Surveillance
DVR: B371-Natick



Date: 07/22/2023 04:20:24.98
Camera: 1 B371 WALK UP ATM
Event: Surveillance
DVR: B371-Natick

119. On February 27, 2024, investigators executed a federal search warrant at the BAEZ RESIDENCE. *See* 24-mj-4027-DHH. Investigators seized an identical sweatshirt depicted in the lower photo above. I believe that BAEZ was the individual attempting to withdraw funds from K.B.'s account on July 22, 2023. A photograph of the sweatshirt seized from the BAEZ RESIDENCE is depicted below:



Sweatshirt seized from BAEZ RESIDENCE on 2/27/24

120. **July 26, 2023**—at approximately 6:15 a.m., a masked subject entered the Eastern Bank ATM at 1413 Tremont Street, Boston and made cash withdrawals totaling \$740 from an account in the name “O.R.”³¹ The account was opened on July 17, 2023, and was funded by a fraudulent \$3,205 mobile deposit of a washed check. The check belonged to Victim 14 of Wellesley, who mailed the check in a USPS collection box

³¹ The account holder, O.R., was paroled from state prison in May of 2023, having served a sentence for distribution of cocaine and related drug offenses. On August 14, 2023, WPD interviewed O.R. at the State Parole Office in Brockton. The interview was audio recorded. In sum and substance, investigators informed O.R. that they wanted to speak with him regarding a bank account related to a check fraud investigation. Investigators told O.R. that he did not have to talk to police. He exclaimed that he did not have anything to say and that scams happen all the time. O.R. ultimately made statements that he lost a bag which contained his debit card and all his bank account information in the area of Roxbury/Mission Hill. O.R. resides in the Mission Hill neighborhood.

outside the Grove Street Post Office in Wellesley on July 19, 2023. Victim 14 confirmed they did not write the check to O.R.

121. The subject who conducted the transaction wore a full-face mask³² and arrived in a black Mercedes E-class sedan with heavily tinted windows, no front license plate, and AMG wheels, identical to BAEZ's vehicle.

122. **July 31, 2023**—a WPD officer stopped BAEZ's vehicle for not displaying a front license plate and having excessive window tint. He learned that the driver—BAEZ—was the registered owner of the vehicle and that BAEZ had a suspended license. The officer arrested BAEZ. BAEZ had more than \$1,200 in his pocket, despite claiming to be unemployed. During an inventory of the vehicle, officers discovered stolen checks from Wellesley, Sherborn, and Newton, debit cards issued to people other than BAEZ, an Eastern Bank ATM cash withdrawal receipt, receipts for PMOs, and chemicals used for check washing. WPD found an ATM withdrawal receipt associated with the July 26, 2023 ATM withdrawal as well as Victim 14's washed check.

123. During booking at WPD, BAEZ provided a cell phone number (857) 452-4671. WPD called the number and confirmed that BAEZ's phone rang. BAEZ's number is serviced by T-Mobile. Historical cell-site location information for BAEZ's phone obtained by search warrant indicate that he was likely present on July 22, 2023 for the attempted ATM withdrawals from the K.B. account at Eastern Bank with MILLER, on

³² The subject who conducted the withdrawals from O.R.'s account has a right arm tattoo consistent in appearance with a known tattoo of MILLER; three fanned out playing cards with the top card bearing a spade on his upper forearm. In addition, approximately one hour prior to the ATM withdrawals, the online banking logs for O.R.'s Eastern Bank account logged the Comcast IP address 75.69.229.173, which was leased to the MILLER RESIDENCE.

July 25, 2023 for the ATM withdrawals from the A.C. account withdrawal at Eastern Bank with BRIMAGE, and on July 26, 2023 for the ATM withdrawals from the O.R. account at Eastern Bank with MILLER.

124. The following was seized from BAEZ's vehicle on July 31, 2023:
 - a. Three receipts documenting the purchase or redemption of PMOs:
 - i. July 21, 2023—purchase of PMO ending in 514 (\$500) from the Framingham Post Office, this was one of the PMOs purchased using the W.B. Eastern Bank card.³³
 - ii. July 25, 2023—purchase of PMOs ending in 462 (\$500), 473 (\$500), and 484 (\$500) from the Framingham Post Office, these were all purchased using an Eastern Bank card in the name M.H.³⁴ USPIS Inspectors determined that the PMOs purchased on July 25 were all made payable to MATOS at the BAEZ RESIDENCE.
 - iii. July 28, 2023 – cash redemption of PMO ending in 484 (\$500) at the Roxbury Crossing Post Office. USPIS Inspectors obtained scanned images of this redeemed PMO; it was paid to MATOS.
 - b. The following debit cards:
 - i. Chime bank card issued in the name “Josman Romero,” Chime records confirmed the account holder was ROMERO DELGADO.
 - ii. An Eastern Bank debit card in the name “M.J.,” the same card that was used at Wal-Mart in New Jersey on July 27, 2023, as noted above.
 - iii. A North Easton Savings Bank card in the name L.C.
 - c. The following checks:
 - i. One check belonging to Victim 14 of Wellesley, which was the check made payable to “O.R.”

³³ W.B.'s account was funded by a \$3,335.01 mobile deposit of a washed check belonging to Victims 5 of Newton. Six other checks belonging to Victims 5 were also found in BAEZ's vehicle.

³⁴ M.H.'s account was funded by a fraudulent mobile deposit of a check belonging to Victims 15 of Newton.

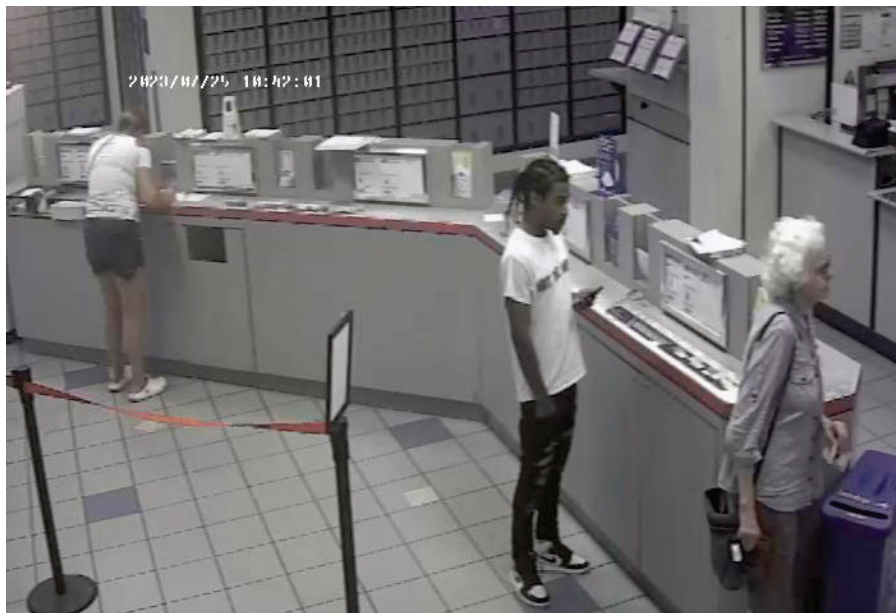
ii. The corresponding Eastern Bank ATM withdrawal receipt from the O.R. account believed to be obtained by MILLER on July 26, 2023.

iii. Six checks belonging to Victim 5 of Newton. These checks were all still payable to utility and service providers, as Victim 5 had written them. One of Victim 5's checks, which was not recovered but is consistent in series with the recovered checks, had been washed and used to fund the W.B. Eastern Bank account.

iv. One check belonging to Victim 16 of Sherborn.

v. One check belonging to Victim 17 of Newton.

125. USPIS Inspector Gugliotta obtained video from the Framingham Post Office for the purchase of the PMOs on July 21, 2023, and July 25, 2023 seized from BAEZ's vehicle. The subject who purchased the PMO on July 21 was wearing a hooded sweatshirt and is not readily identifiable. MILLER purchased the three PMOs on July 25, which were ultimately redeemed by MATOS. A still image of MILLER purchasing the PMOs is below:



126. **October 20, 2023**— at 7:46 p.m., the second of Victim 10’s checks, which was made payable to J.B.³⁵ for \$18,605.22, was deposited at a TD Bank ATM at 175 Great Road in Bedford. As stated above, two checks belonging to Victim 10 of Needham were stolen from the mail, altered, and made payable to unintended payees. One check was deposited by ROMERO DELGADO on October 16, 2023.

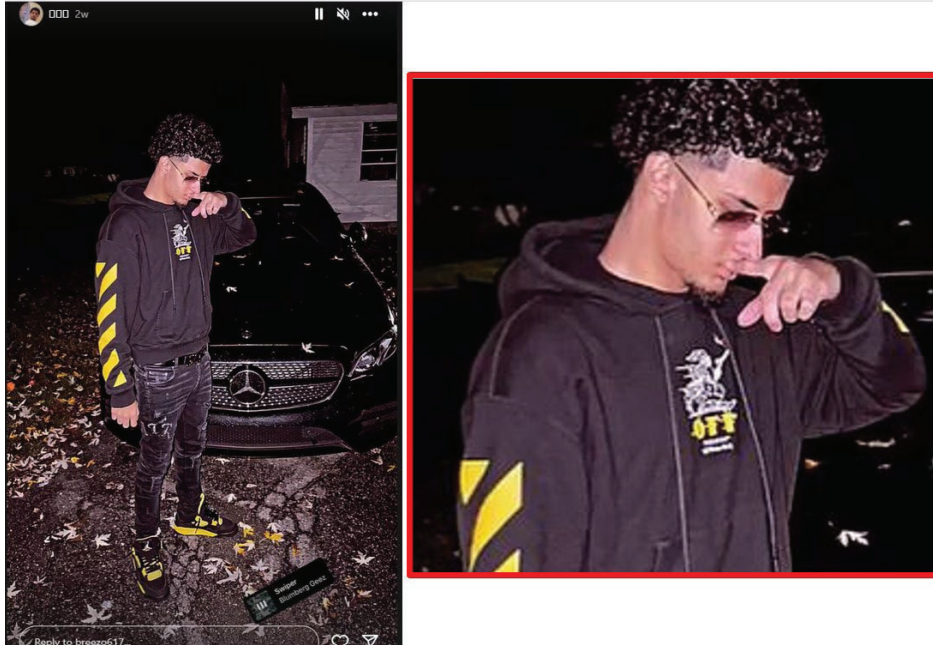
127. Needham Police Detectives obtained CCTV and account records from TD Bank documenting the deposit of Victim 10’s check into J.B.’s account. CCTV from the bank depicted a dark colored SUV backing into a parking space nearly out of camera view. A masked subject emerged from the passenger side of the SUV, approached the drive-up ATM on foot, and deposited Victim 10’s check. The video depicted the subject wearing a sweatshirt with a unique design in possession of a TD Bank card and a blue Apple iPhone that he manipulated throughout the transaction. A screenshot is below:



128. A mid-October 2023 Instagram story posted by BAEZ depicted him wearing an identical sweatshirt, standing in front of the BAEZ vehicle, parked in the

³⁵ J.B. opened her TD Bank account on October 11, 2023.

driveway of a home that looks like the BAEZ RESIDENCE. BAEZ is also wearing yellow and black Jordan sneakers consistent with sneakers worn by an individual who stole mail outside the Wellesley Square Post Office on October 9, 2023.



129. MILLER’s phone contained communications with BAEZ at (857) 452-4671 about the card cracking scheme. MILLER saved BAEZ’s number under the contact name, “Breezo.” For example, on September 22, 2023, MILLER reached out to BAEZ about how much he could expect to gain from an account:

MILLER: *If I give u a piece wat u dropping on it ?? [piece meaning debit card]*

BAEZ: *what piece?*

MILLER: *Rockland [Rockland Trust]*

BAEZ: *like4-5 [four to five thousand dollars]*

g. RIOS-FRANCO a/k/a Manny and MARTINEZ a/k/a Jay

130. **July 27, 2023**—at 6:45 a.m., the business owner at Mike’s Gas at 1005 Worcester Street contacted the police to report that a black Jeep Grand Cherokee had parked in front of his business and two men had exited the Jeep wearing ski masks. The

caller reported that as the two men approached the TD Bank at 999 Worcester Street, the owner confronted them about parking at his gas station. The two refused to park at the bank and said they were going to use the ATM machine. The caller asked them why they were wearing masks and one of the men replied “What, I can’t have a sheisty on?”³⁶ The caller further described the vehicle as a black Jeep Grand Cherokee, 2015 model, with blacked out windows that were “super dark.”

131. Officers arrived at Mike’s Gas and the TD Bank minutes later but the Jeep had already left the area. They observed a receipt in the TD Bank ATM documenting \$740 worth of cash withdrawals from an account ending in 0547. TD Bank ultimately identified four Eastern Bank debit cards that were swiped at the ATM machine during the transactions. Eastern Bank provided account records for three of the cards. The bank was unable to locate an account associated with the fourth card:

- a. Card ending 0547 belonging to S.G.—S.G.’s account was opened on July 26, 2023 and funded with a fraudulent \$3,211.64 mobile deposit of a washed check belonging to Victim 18 of Brockton. On July 27, 2023, someone withdrew \$2,440 from the account.
- b. Card ending 7683 belonging to Je.B³⁷—on July 25, 2023, Je.B.’s account was opened and funded with a fraudulent \$4,616.71 mobile deposit of an altered check belonging to Victim 19 of Braintree. On July

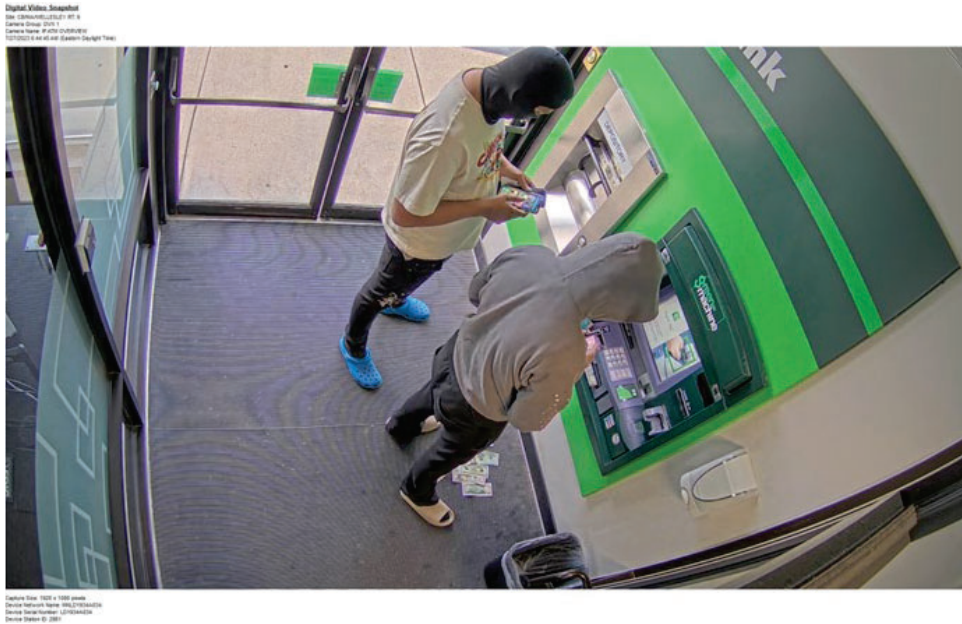
³⁶ A “sheisty” is a slang term for a balaclava-style face mask.

³⁷ On July 27, 2023, Je.B made a recorded call to Eastern Bank customer service claiming that Credit Karma informed them that their information was leaked on a website. They said they logged into their bank account and saw a mobile deposit that they did not make, and that their account was negative \$3,000 dollars. The bank informed Je.B their account was closed for fraud, and they would need to dispute it in-person at a branch.

26, 2023, someone withdrew \$2,440 from the account. The following day, July 27, 2023, someone withdrew \$1,540 from the account.

c. Card ending 1495 belonging to J.D.—on July 26, 2023, J.D.’s account was opened and funded with a fraudulent \$4,700.21 mobile deposit of a washed check belonging to Victim 20 of Braintree. Victim 20 reported that they mailed the check in a USPS collection box outside the Pearl Street Post Office in Braintree on July 21, 2023. Victim 20 confirmed that they did not write the check to J.D. On July 27, 2023, someone withdrew \$2,440 from the account. The following day, July 28, 2023, someone withdrew \$2,140 from the account.

132. TD Bank provided eight still photographs depicting two masked subjects in the ATM lobby conducting the transactions using the previously mentioned cards between 6:42 a.m. and 6:47 a.m. on July 27, 2023.



133. Subject 1 (right) was shorter and wore a black balaclava-style mask, sunglasses, a gray “Sp6der” hooded sweatshirt with green writing, a spider-web graphic

and white spots. He wore black sweatpants and tan slide sandals. For reasons discussed below, I believe that Subject 1 is RIOS-FRANCO. RIOS-FRANCO possessed a cell phone that he used during his time in the ATM lobby. One image depicted RIOS-FRANCO standing over money that was fanned out across the ATM floor with his cell phone in-hand, consistent with him taking a photo of the money. Based on my training and experience, these types of images are popular as trophy images and appear in recruitment ads posted to social media to entice people into opening bank accounts for the scheme.

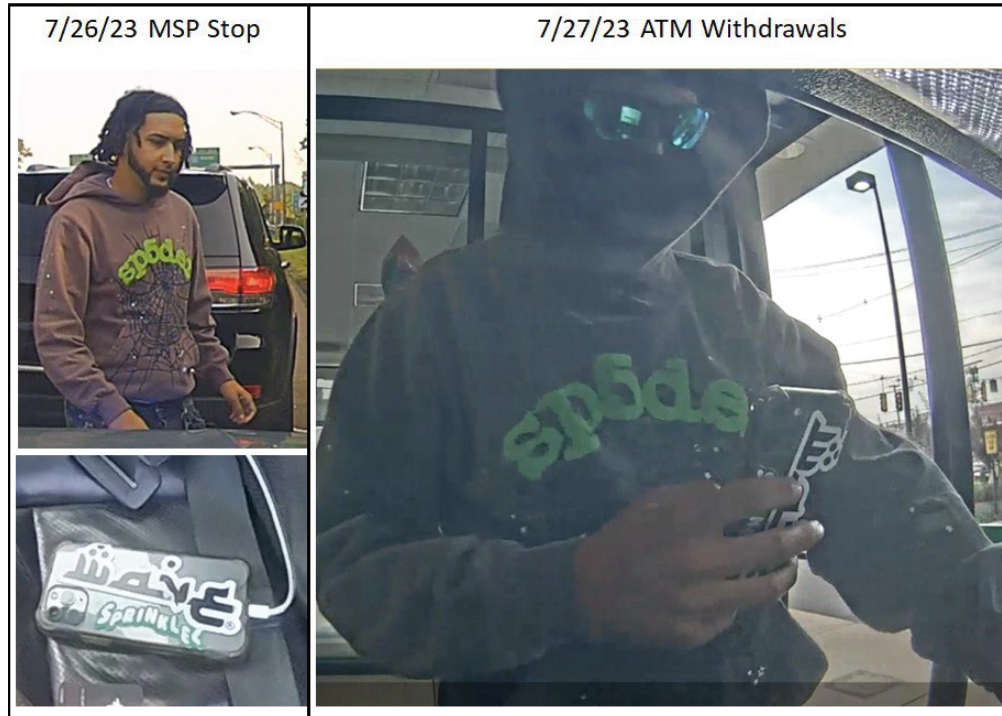
134. Subject 2 (left) was a taller male subject wearing a black balaclava style mask, a tan "Gallery Dept" graphic T-shirt, black ripped jeans, and distinctive, bright blue Croc shoes. Subject 2 possessed two cell phones, which he appeared to be using while in the ATM lobby. For reasons discussed below, I believe that Subject 2 is MARTINEZ. One CCTV image depicted MARTINEZ taking a photo of the ATM screen. Based on my training and experience, photographs of ATM screens documenting account balances and cash withdrawals are also popular for use in recruitment ads for card cracking schemes.

135. Investigators subsequently reviewed Town of Wellesley Traffic Camera footage along Route 9 in the areas of Route 9 at Route 16 and Route 9 at Kingsbury Street. The cameras depicted a black Jeep Grand Cherokee with no front license plate and darkly tinted windows traveling along Route 9 West minutes before the transactions at TD Bank. Images of the Jeep are below.



136. Based on this investigation and others, agents were aware that RIOS-FRANCO was involved in mail theft and card cracking schemes. Investigators conducted a law enforcement report query of RIOS-FRANCO and learned that he was identified as the driver of the Black Jeep (as discussed above, suspected to be involved in the September 4, 2023 mail theft incident).

137. **August 24, 2023**—an investigator reached out to the MSP Trooper who had issued RIOS-FRANCO a summons for driving the Jeep with a suspended license on July 26. The investigator forwarded the Trooper some of the TD Bank CCTV images, and initially, he told investigators that he had no recollection of the subjects. After reviewing his body worn camera (“BWC”), the Trooper informed investigators that RIOS-FRANCO, the driver of the Black Jeep, was wearing an identical sweatshirt as one of the subjects in the photo at the TD Bank ATM. A photo of RIOS-FRANCO during the July 26 traffic stop is next to a photo of Subject 1 at the TD Bank ATM in Wellesley on the morning of July 27. A sticker on RIOS-FRANCO’s phone case is also identical to a sticker on the phone held by Subject 1 at the ATM machine.



138. During the Trooper's stop of RIOS-FRANCO on July 26, RIOS-FRANCO provided a contact phone number of (617) 749-5953, which is one digit off from his actual contact number.³⁸ Troopers also questioned RIOS-FRANCO about a debit card that did not belong to him, and he indicated it was his.

139. The second subject at the ATM with RIOS-FRANCO, wearing the blue Croc shoes, appeared to be MARTINEZ. On February 27, 2024, investigators executed a search warrant of the MARTINEZ RESIDENCE and seized an identical pair of blue Croc shoes. Agents also seized "DBO Gang" sweatshirts from the residence where MARTINEZ and WORTHEN resided together. I believe that this corroborates that MARTINEZ and WORTHEN are associated with the Mission Hill street gang.

³⁸ RIOS-FRANCO's actual phone number is (617) 749-5956, which he provided to MATOS via Instagram on August 25, 2023. He offered to "collaborate" with MATOS after discussing how much a TD bank account could be exploited for. RIOS-FRANCO provided the same false phone number to MSP after a car crash with the Black Jeep on September 4, 2023.

MARTINEZ was identified in the investigation because his phone number, (617) 487-3233,³⁹ was one of the last numbers to communicate with CABRAL-SANTOS before the mail theft incidents in Newton (3:00 a.m.) and Weston (3:30 a.m.) on August 17, 2023. Further, around the time of those calls, historical cell-site location information of CABRAL-SANTOS' phone records obtained by search warrant showed his cellphone traveled to the general area of MARTINEZ's former residence at 28 Haslet Street in Roslindale.

140. Immediately upon departing the area of MARTINEZ's residence, CABRAL-SANTOS' device traveled to the Hancock Village Shopping Plaza (the location of mailboxes associated with numerous Brookline check fraud reports), the Newton Post Office (where the Red Tesla and three subjects were on video stealing mail), and the Weston Post Office (where the Red Tesla and three subjects were on video stealing mail). Following the Red Tesla's flight from Weston Police, CABRAL-SANTOS' phone returned to the area of MARTINEZ's residence at 28 Haslet Street and remained there from approximately 3:50 a.m. to 4:50 a.m. It then traveled to the area of the CABRAL-SANTOS RESIDENCE. I believe that CABRAL-SANTOS and MARTINEZ were responsible for the mail thefts on August 17, 2023.

141. In reviewing the TD Bank video from July 27, 2023 in Wellesley, investigators noted that Subject 2 has a left forearm tattoo of flowers that is consistent with a known tattoo on MARTINEZ's left forearm. This tattoo was photographed by

³⁹ The (617) 487-3233 number was associated with the Apple ID bigrtlceo1123@icloud.com, which has had numerous billing profiles in the name of Jonathan MARTINEZ at 28 Haslet Street, Roslindale, Martinez's former residence. Further, the Commonwealth of Massachusetts sends public benefits to MARTINEZ and uses this telephone number to contact MARTINEZ.

BPD during MARTINEZ's most recent arrest on May 29, 2023. Photos are depicted below, the BPD photograph (right) and a still photo from TD Bank Wellesley (left).



142. **September 4, 2023**—as referenced above, a mail theft occurred in Wellesley in the early morning hours of September 4, 2023 involving the Black Jeep. At approximately 7:45 a.m. that same morning, the Black Jeep was involved in a crash along the Arborway in Boston. MSP responded to the scene and identified the driver as RIOS-FRANCO. RIOS-FRANCO told the Trooper he had just dropped “his boy” off and was on his way home when he crashed into another car and ultimately a pole. RIOS-FRANCO was picked up from the scene of the crash by two friends, including MARTINEZ. MARTINEZ wore bright blue Croc shoes, consistent with the shoes he wore at the TD Bank cash withdrawal in Wellesley on July 27 and those seized from the MARTINEZ RESIDENCE. A still capture of body-worn camera video depicting MARTINEZ wearing the blue Crocs at the scene of the crash is below:



143. **July 26, 2023**—MARTINEZ also participated in the card cracking scheme. On July 26, N.B. of Dorchester opened Eastern Bank checking and savings accounts.⁴⁰ On July 27, 2023, N.B.’s checking account was funded by a fraudulent \$3,000 mobile deposit of a washed check belonging to Victim 21 of Braintree.

144. **July 27, 2023**—on the day of the fraudulent check deposit, N.B. called Eastern Bank customer service, verified his social security number and phone number, and then requested to add the phone number (617) 487-3233 (MARTINEZ’s phone number) to his account to receive SMS push verifications. The call was recorded. Later that day, the fraudulent mobile check deposit was submitted.

145. **July 28, 2023**—An individual withdrew \$740 from the N.B. account at an ATM in Boston, and N.B.’s card was swiped in small transactions at Wal-Mart in Danvers and Dunkin’ Donuts in Peabody.

⁴⁰ N.B. has arraignment entries on his adult BOP for domestic violence charges. He has entries on his juvenile BOP for A&B dangerous weapon, shoplifting, and threatening to commit a crime.

146. On August 24th, MATOS sent direct Instagram messages to “bbm.yktv41,” which is believed to be RIOS-FRANCO’s account.⁴¹ MATOS inquired what the “*vibes were on td.*” RIOS-FRANCO replied, “*depends how old*” and “*6 months or older 20k.*” Based upon my training and experience, MATOS inquired about how much money he could expect to exploit from an account at TD Bank. RIOS-FRANCO’s answer reflected his knowledge that new accounts are more highly scrutinized by the bank, and that established accounts are easier to pass fraudulent checks through. In the conversation, which extended to August 25, 2023, RIOS-FRANCO stated, “*Let’s collab my boy lmk [let me know]*” and “*Hit my jack gang 6177495956.*” I believe RIOS-FRANCO provided MATOS with his phone number (617) 495-5956 and offered to collaborate in the card cracking conspiracy.

147. Investigators have reviewed phone records for RIOS-FRANCO’s telephone and learned that he placed numerous calls to several financial institutions as recently as late January 2024. Between September of 2023 and late January 2024, RIOS-FRANCO made repeated calls to financial institutions such as Bank of America, Citizens Bank, Eastern Bank, First Republic Bank, Rockland Trust and Santander Bank. For example, he placed nearly 150 calls to a Citizens Bank telephone number, which allows customers to check their available balance; transfer money; and verify recent payments, deposits, and withdrawals. Similarly, he placed more than 60 calls to a Santander Bank telephone number dedicated to learning checking account balances. From my training

⁴¹ At the time, the account “bbm.yktv41” had numerous public postings depicting photos of RIOS-FRANCO, leading me to believe he owned the account.

and experience, I believe this is consistent with RIOS-FRANCO monitoring third party bank account balances from his telephone to engage in the card cracking scheme.

148. MILLER's phone contained communications with MARTINEZ about the card cracking scheme on two separate numbers affiliated with MARTINEZ: a T-Mobile number (617) 820-1656⁴² and the Verizon number (617) 487-3233. A text conversation with (617) 820-1656 ran until August 16, 2023. In that conversation, MARTINEZ provided the address "28 Haslet Street" for MILLER to meet him on March 26, 2023, and April 6, 2023. This is the address investigators believe MARTINEZ resided at until on/about August 31, 2023. This conversation included screen captures of online bank statements, photos of debit cards, photos of ATM receipts, photos of PMOs, and the passing of online bank login information and PIN numbers.

149. MARTINEZ and MILLER exchanged text messages until October 24, 2023, the day of MILLER's arrest. This conversation also included communications about the card cracking scheme. For example, on October 19, 2023, MARTINEZ texted MILLER, "Yoo," "20k next day sandy," and "Fresh accounts too." Based upon my training and experience, I believe MARTINEZ offered to collaborate with MILLER to obtain \$20,000 using a Santander Bank account, even a newer account, in a card cracking scheme. Over the next two days, MILLER and MARTINEZ discussed a payment split for an account that MILLER was going to provide. MILLER stated, "They want like 9k my man want 1k for da play , u want 3.5 so that's 13,500 I'm cool wit 2k if not lol more so da drop like round 15-16k." On October 21, 2023, MILLER sent a photo of a

⁴² The (617) 820-1656 number was associated with the Apple ID jaayivy14@icloud.com, which contained billing profiles for Jonathan MARTINEZ, 28 Haslet Street, Roslindale.

Santander Bank debit card and they discussed when they would meet. In the conversation about the Santander Bank account, MARTINEZ provided the address “18 Jewett st” (the MARTINEZ RESIDENCE) for MILLER to meet him on October 23, 2023.

h. WORTHEN a/k/a Bone

150. WORTHEN’s phone number (617) 412-7118 has appeared numerous times throughout this investigation. This phone number is in MILLER’s phone as “Bone.” I believe that this phone number and the nickname Bone is associated with WORTHEN for several reasons. First, at the time of MILLER’s arrest, WORTHEN made statements to MARTINEZ within hearing of agents indicating that the two lived together. During the execution of the search warrant at the MARTINEZ RESIDENCE on February 27, 2024, investigators learned that WORTHEN and MARTINEZ lived together at the MARTINEZ RESIDENCE. Second, throughout the fall of 2023, the Apple ID associated with WORTHEN’s phone number regularly used an IP address subscribed in MARTINEZ’s name at the MARTINEZ RESIDENCE. Third, in September of 2023, photographs depicting mobile bank accounts were sent from WORTHEN’s phone number to MILLER’s phone and contained embedded GPS coordinates in the immediate area of the MARTINEZ RESIDENCE. Fourth, in February of 2023, MARTINEZ added WORTHEN’s phone number to a group messaging chat that included MILLER. At the same time, MARTINEZ changed the group photo to an image clearly depicting WORTHEN’s face.

151. **July 21, 2023**—WORTHEN called Eastern Bank about an account being locked. WORTHEN identified himself as the account holder, T.T., and provided a social

security number for verification. The customer service representative conferenced in the fraud department and they discussed that the account was locked due to suspected fraud.

152. According to MILLER's phone, MILLER and WORTHEN had conversations consisting mainly about financial fraud. For example, on October 5, 2023, WORTHEN sent the following messages to MILLER, "*Send m&t name rn*" [referencing M&T Bank] and "*Tryna drop.*" Based on my training and experience, I am aware that "drop" is a slang term for a check deposit. WORTHEN additionally messaged, "*Yo tell her send her security answers,*" "*Cause its gone keep asking me,*" and "*And make sure no one else signing in.*" Based on my training and experience, WORTHEN directed MILLER to contact the third-party account holder of the account he was using for a card cracking scheme.

153. On October 17, 2023, MILLER asked WORTHEN, "*U got heat ??*" and stated, "*Talkin bout to wash.*" WORTHEN responded, "*Advanced auto parts or auto zone.*" I am aware from my training and experience that this was a discussion about obtaining chemicals used to wash stolen checks. I believe that WORTHEN instructed MILLER to go to an auto parts store to obtain the chemicals.

154. On October 18, 2023, WORTHEN messaged MILLER, "*I got like 5 accounts too*" and listed, "*Tds rocklands and sandys.*" I believe that WORTHEN informed MILLER that he had five accounts available for card cracking from TD Bank, Rockland Trust, and Santander Bank.

D. SEARCH WARRANTS EXECUTED FEBRUARY 27, 2024

155. As discussed above, investigators executed numerous federal search warrants on February 27, 2024 connected to the TARGET INDIVIDUALS. *See* 24-mj-

4026-4039-DHH. The following are relevant items seized or information obtained from the execution of these search warrants. Numerous electronic devices were seized during the execution of these warrants. Some of the devices have been extracted and investigators continue to review the contents pursuant to the search warrants.

a. Imanol RIOS-FRANCO

156. At the RIOS-FRANCO RESIDENCE (3611 Washington Street, Unit B222, Boston, MA 02130), investigators detained RIOS-FRANCO and seized 131 checks issued by dozens of individuals and businesses organized inside a clear plastic box. These checks appear to have been stolen because they had no connection to RIOS-FRANCO. Investigators identified some of the victims of these stolen checks seized from RIOS-FRANCO's residence and corresponded with 41 of those individuals and businesses whose stolen checks were seized from the RIOS-FRANCO RESIDENCE. All of the 41 identified victims reported that they had mailed the checks and none of them issued any checks to RIOS-FRANCO. Agents also seized numerous debit cards in other individuals' names. Some were seized throughout the residence and some were contained within the clear box with the stolen checks. A photo of the clear box containing the checks is below:



157. Investigators also searched RIOS-FRANCO's vehicle. Inside his vehicle, agents seized additional stolen checks. Two individuals reported to investigators that the check seized from RIOS-FRANCO's vehicle were mailed and that they were not issued to RIOS-FRANCO. Also inside the vehicle, agents seized debit cards in other individuals' names and a bottle chemicals used to wash the ink from checks.

b. Jairo CABRAL-SANTOS

158. At the CABRAL-SANTOS RESIDENCE, investigators encountered CABRAL-SANTOS' brothers. CABRAL-SANTOS was not present at the time of the search warrant execution. When agents entered the residence, one of CABRAL-SANTOS' brothers was flushing pieces of checks in the toilet. Remnants of the checks were observed and photographed in the toilet. As stated above, agents seized a sweatshirt from the residence that matched one that CABRAL-SANTOS wore to steal mail and make fraudulent deposits and withdrawals. Investigators also seized additional checks that appeared to be stolen. Investigators corresponded with two individuals who reported that they had mailed the checks that were seized from the CABRAL-SANTOS RESIDENCE and that no checks were issued to CABRAL-SANTOS. In addition, investigators seized paperwork belonging to CABRAL-SANTOS, a bottle of chemicals used to wash checks, and numerous debit cards in other individuals' names.

b. Brandon BAEZ

159. At the BAEZ RESIDENCE, investigators detained BAEZ and seized checks that appeared to be stolen. Investigators corresponded with three individuals who reported that they had mailed the checks that were seized from the BAEZ RESIDENCE and that no checks were issued to BAEZ. Further, investigators seized debit cards in

other individuals' names, the sweatshirt described above that BAEZ was wearing during an attempted ATM withdrawal, another individual's social security card, blank check paper, and chemicals used to wash ink from checks.

160. In BAEZ's vehicle, agents seized more checks that appear to be stolen because they have no connection to BAEZ. Agents also seized PMO receipts and debit cards in other individuals' names.

d. Jiovanny MATOS and Josman ROMERO DELGADO

161. At the MATOS RESIDENCE, investigators detained MATOS and seized documents in MATOS' name, bank receipts, debit cards in other individuals' names, and several checks that appeared to be stolen because they had no connection to MATOS. One of the checks was issued by the City of Aspen, Colorado. A representative of the city reported that the check was mailed and was not issued to MATOS.

162. ROMERO DELGADO lived at the MATOS RESIDENCE, in a bedroom across the hall from MATOS' bedroom. ROMERO DELAGDO was not present at the time of the execution of the search warrant. The individual who was sleeping in ROMERO DELGADO's room informed agents that he was informed that no one would be using that room and that he could sleep there. That individual claimed to not know ROMERO DELGADO's name but provided a physical description that matched ROMERO DELGADO.

e. Jonathan MARTINEZ and Anthony WORTHEN

163. At the MARTINEZ RESIDENCE, investigators detained MARTINEZ and WORTHEN. In MARTINEZ's bedroom, agents seized MARTINEZ's personal documents and numerous checks that appeared to be stolen because they had no

connection to MARTINEZ. Investigators corresponded with 19 individuals and businesses who reported that they had mailed the checks that were seized from MARTINEZ's bedroom and that no checks were issued to MARTINEZ. Agents also seized numerous debit cards in other individuals' names, banking mail for other individuals, blank check paper, and the blue Croc shoes as discussed above.

164. In WORTHEN's bedroom, agents seized WORTHEN's personal documents and numerous checks that appeared to be stolen because they had no connection to WORTHEN. Investigators corresponded with two businesses that reported that they had mailed the checks that were seized from WORTHEN's bedroom and that no checks were issued to WORTHEN. Agents also seized PMO receipts and identifications in other individuals' names.

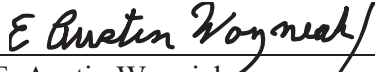
165. In the kitchen, agents seized blank debit and credit-style cards. These cards had the weight and shape of a typical debit card but were white and had no embossing or print on them. Also in the kitchen, agents seized a card printing, embossing, and encoding machine. This machine could be used to print, emboss, and encode these blank cards to appear and work like a debit card. Agents also seized from the kitchen a bottle of a chemical commonly used to wash ink from checks.


CONCLUSION

166. Based on the information described above, I have probable cause to believe that, from in or about July 2023 to in or about February 2024, the TARGET INDIVIDUALS conspired to commit wire and bank fraud, in violation of 18 U.S.C. § 1349 (conspiracy), 18 U.S.C. § 1343 (wire fraud), and 18 U.S.C. § 1344 (bank fraud); and conspiracy to steal and possess stolen mail, in violation of 18 U.S.C. § 371

(conspiracy) and 18 U.S.C. § 1708 (theft or receipt of stolen mail), (hereinafter, the “TARGET OFFENSES”). I respectfully request that the Court issue a criminal complaint charging the TARGET INDIVIDUALS with the TARGET OFFENSES.


Respectfully submitted,



E. Austin Wozniak
Special Agent
Bureau of Alcohol, Tobacco, Firearms, and
Explosives 

Attested and sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on this 27th day of August 2024.

4:18 p.m.


The Honorable David H. Kennedy
United States Magistrate Judge
District of Massachusetts 