
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

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CRIMINAL COMPLAINT

-v-

Mag. No. 07- 8144

MERLINHG ALCANTARA.
a/k/a, "Melvin Alcantara"

I, Richard Koles, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Treasury Inspector General for Tax Administration and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

Richard Koles, Special Agent
Treasury Inspector General for Tax Administration

Sworn to before me and subscribed in my presence,
November 15, 2007, in Essex County, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

From on or about November 5, 2004, to on or about November 15, 2007, in Essex County, in the District of New Jersey and elsewhere, defendant MERLINHG ALCANTARA did:

knowingly, wilfully and with intent to defraud, conspire and agree with A.T., L.A., J.C., K.R. and others did pass, utter and publish a falsely made, forged, counterfeited and altered obligation and security of the United States, contrary to Title 18, United States Code, Section 472.

OVERT ACTS

In furtherance of the conspiracy and to effect its unlawful object, the following overt act was committed in the District of New Jersey and elsewhere:

On or about November 15, 2007, defendant Alcantara met with A.T. in or about Newark, New Jersey and provided approximately \$1,100 in cash in exchange for purportedly legitimate United States treasury checks.

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Richard M. Koles, a Special Agent of the Treasury Inspector General for Tax Administration (TIGTA), following an investigation and my review of reports and discussions with other law enforcement personnel, am aware of the following facts. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every detail of every aspect of the investigation. All references to an individual's statements are in substance and in part only:

OBJECT OF THE CONSPIRACY

1. The object of the conspiracy was for defendant MERLINHG ALCANTARA and his coconspirators to enrich themselves by stealing United States Treasury checks from airplanes at Newark Liberty International Airport, creating counterfeit checks using the information from those Treasury checks and negotiating those counterfeit checks at various banks.

MANNER AND MEANS

2. On or about May 17, 2005 a representative from Washington Mutual Bank informed law enforcement that the bank suspected that four counterfeit United States treasury checks made payable to J.C. were deposited into the account of J.C. (hereinafter "J.C. Washington Mutual Checks").

3. Law enforcement was provided a copy of the J.C. Washington Mutual Checks and confirmed that the original Treasury checks had not been issued to J.C. Instead, the original checks had been issued to private individuals in connection with federal income tax refund checks. The check numbers, account numbers, routing numbers and check amounts on the J.C. Washington Mutual Checks were identical to the original checks. The J.C. Washington Mutual Checks differed solely in that the payee was altered and the paper on which the check was printed was not original Treasury paper.

4. On or about, February 17, 2005, law enforcement was informed by Bank of America that fraudulent Treasury checks in the name of J.C. were deposited at two separate Bank of America branches into an account in the name of J.C. These fraudulent Treasury checks were similar to the J.C. Washington Mutual Checks in that they too had legitimate check numbers, account numbers, routing numbers, and check amounts, but had the payee name altered to "J.C."

5. During the course of the investigation, law enforcement obtained additional counterfeit treasury checks made payable to J.C. Fingerprint analysis conducted on these checks reveal Defendant Merlinhg Alcantara's fingerprints on the following:

- a. A fraudulent Treasury check in the amount of approximately \$19,000, deposited into the Washington Mutual account in the name of J.C. on or about October 25, 2004;
- b. A fraudulent Treasury check in the amount of approximately \$46,000, deposited into the Bank of America account in the name of J.C. on or about, January 10, 2005; and
- c. A fraudulent Treasury check in the amount of approximately \$340,000, deposited into the Bank of America account in the name of J.C. on or about January 21, 2005.

6. On or about November 7, 2007 defendant Merlinhg Alcantara called A.T. and requested that A.T. contact him.

7. On or about November 8, 2007, A.T. returned defendant Merlinhg Alcantara's call and inquired about whether L.A., defendant Merlinhg Alcantara's brother, was still making counterfeit checks. Defendant Alcanatara replied that he would contact his brother and have his brother contact A.T. Within approximately ten minutes, L.A. called A.T. regarding the exchange of stolen legitimate Treasury checks for money.

8. On or about November 14, 2007, L.A. spoke with A.T. and arranged a meeting between A.T. and defendant Alcanatara at their previous meeting spot, which was on or near McCarter Highway in Newark, New Jersey. The purpose of the meeting was for A.T. to provide legitimate Treasury checks to defendant Merlinhg Alcantara in exchange for money. L.A. promised A.T. approximately \$5,000. Subsequently, A.T. contacted defendant Merlinhg Alcantara to confirm L.A.'s plans.

9. On or about November 15, 2007, defendant Merlinhg Alcantara met with A.T. on or near McCarter Highway in Newark, New Jersey, as previously arranged, and provided approximately \$1,100 in cash in exchange for Treasury checks. Defendant Merlinhg Alcantara explained that he intended to go to New York to get additional money and suggested meeting A.T. later that day to provide the rest of what was owed to him. Defendant Merlinhg Alcantara was then arrested by law enforcement.