

AFFIDAVIT

I, Anthony E. Matarese, do under oath depose and say that:

1. I am a Special Agent employed with the United States Postal Service (USPS), Office of Inspector General (OIG), Northeast Area Field Office. I have been employed as a Special Agent since March 4, 2004, and I am currently assigned to the Woonsocket, RI field office. I graduated the Federal Law Enforcement Center, Glynco, GA, in June of 2004, where I received extensive training in criminal investigations. Prior to joining the OIG, I served as a United States Probation Officer, for the United States District Court, District of Rhode Island for approximately six and one half years. For the past nine years, I have been assigned to investigate USPS employees involved in the theft and/or destruction of the United States Mail as well as various other types of employee misconduct. I have attended several additional day and week-long trainings in the investigation of the theft and/or destruction of the United States Mail. In the past nine years, I have investigated numerous mail theft and destruction of mail allegations made against USPS employees that have resulted in criminal convictions and the termination of employment.

2. I submit this affidavit in support of a criminal complaint charging:

- a. Brenda Canuelas (Canuelas), who was born in the year 1975 and whose last known address was in Providence, RI and;
- b. Secundino Velazquez Tirado (Tirado), who was born in the year 1970 and whose last known address was in Providence, RI;

with Conspiracy, in violation of 18 U.S.C. § 371; Theft of Mail, in violation of 18 U.S.C. §1708; Theft of Public Money or Property in excess of \$1000, in violation of 18 U.S.C. §641; Forging Endorsements on Treasury Checks in excess of \$1000, in violation of 18 U.S.C. § 510; Bank Fraud, in violation of 18 U.S.C. §1344 and; Aggravated Identity Theft, in violation of 18 U.S.C. §1028A(a)(1).

3. The facts set forth in this affidavit are based upon my personal knowledge gained in the course of this investigation, information reliably provided to me by Detective Nicholas Ludovici of the Providence Police Department Intelligence Unit as well as other officers and agents involved in this investigation, public and investigative

databases, subpoenaed bank records, conversations with bank security personnel, and information provided by victims whose Treasury checks were stolen. I believe that the information supplied by the witnesses who were the victims of stolen mail is reliable because my subsequent investigation corroborated that they did not receive or cash the Treasury checks that were mailed to them. Since this affidavit is made for the limited purpose of supporting a criminal complaint and arrest warrant for Canuelas and Tirado, I have not set forth each and every fact learned during the course of this entire investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged.

Background Investigation

4. Since September of 2014, I have been investigating a matter involving the theft of numerous United States Government Treasury checks from the mails. The one thing that most of these stolen checks had in common was that the ZIP Codes of the intended receivers throughout Rhode Island and nearby Massachusetts would have been handled by employees at the Providence Processing and Distribution Center located on Corliss Street in Providence, RI.

5. At the inception of the investigation, I began to attempt to determine where the checks were cashed in order to identify the persons responsible for these crimes. I sent subpoenas to a number of banks, including ██████████, ██████████, ██████████ and ██████████ for their records concerning individual stolen Treasury checks to determine where those checks were cashed, to identify the account holder information for the accounts into which they were deposited, and to obtain bank surveillance photographs of the individuals opening the accounts or depositing the checks.

6. In general, the bank records and photographs suggested that many individual bank accounts were being opened in the various names appearing on the stolen checks, sometimes in a slightly altered form, by individuals other than the true owner of the check. The stolen checks were deposited in amounts ranging from a few thousand dollars to more than \$10,000 and then the account was drawn down by using debit cards linked to the accounts for cash withdrawals from the bank's ATM, or for the purchase of goods and services, or for the purchase of money orders -- until the account was depleted, nearly depleted, and/or frozen by the bank when fraud was detected.

7. While I was conducting this financial investigation, Detective Nicholas Ludovici the Providence Police Department, Intelligence Unit informed me that, through reliable

and confidential source information, he had learned that two men, Erick Vera Garzon (Vera) and Joan Mustafa (Mustafa) were stealing and selling large volumes of Treasury checks.

8. I determined that Vera and Mustafa were mail clerks employed by the USPS at the Providence Processing and Distribution Center who both worked together in the mail sorting room. Treasury checks are easily recognizable by postal employees, who routinely handle the mail, just by the outward appearance of the envelope in which they are mailed. As mail clerks in the mail sorting area, Vera and Mustafa had access to mail as it passed through the Center, the means to steal it, and the opportunity to do so. They had also been implicated by name as suspects in this crime by an untested source during my preliminary investigation who told me that the two men had been boasting about how much money they were making by taking these checks. However, neither man had turned up in the bank records or surveillance photographs.

9. Detective Ludovici quickly applied for and obtained state search warrants for Vera and Mustafa's residences as well as Vera's automobile and Vera himself based on his own reliable source information which was further corroborated by the evidence gathered in my preliminary investigation.

10. On April 16, 2015, I participated in the search of Vera's residence. At Vera's apartment, among other things, we seized 961 uncashed U.S. Treasury checks with a face value of approximately \$1.6 million, gift cards and other monetary instruments, a safety deposit box key and bank account information. From Vera, his apartment and the car he was riding in when he was arrested (as well what other agents found in Mustafa's residence) we seized a total of approximately \$60,000 in cash.

11. Vera was interviewed after being provided with his Miranda warnings. He admitted to stealing Treasury checks and other items from the U.S. Mail during his employment at the USPS in the Providence Processing and Distribution Center. He said that he partnered with Mustafa in this crime. Vera said that by using the safety deposit box key we had seized we would find about \$60,000 in cash, at the Bank of America, of which some of the money belonged to him and the balance belonged to Mustafa. Vera said that he sold the stolen checks to two men that he claimed to only know by first name but who, he conceded, may have cashed or resold the checks to other people.

12. For his part, after being advised of his *Miranda* rights, Mustafa said he only worked for Vera. He claimed that he was paid to chauffeur Vera who had lost his license due to a drunken driving incident. He also said that he delivered stolen checks for Vera. Stolen gift cards were seized from Mustafa's residence.

13. Federal seizure warrants were issued and we seized an additional \$113,100 in cash from Vera's safety deposit box as well as over \$2700 from his bank account.

Follow up Investigation -- Identification of Canuelas and Tirado

14. Over the course of this investigation I have reviewed numerous bank surveillance photographs and still images from videotapes in an effort to determine who was responsible for depositing the stolen Treasury checks and withdrawing or otherwise disposing of the pilfered government funds. I also examined similar security images provided to me by certain Walmart stores where money orders were purchased using stolen money from those fraudulent bank accounts. Although many people appear to be involved with the stolen Treasury checks, I noticed two people in particular, a man and a woman, who repeatedly conducted transactions involving the stolen Treasury checks.

15. In this regard, I received assistance from [REDACTED], a [REDACTED] Bank investigator. [REDACTED] Bank was conducting their own internal investigation into suspicious banking activity by these same two people and others involved in this scheme. She was able to provide me with a license plate number of a Dodge minivan used by the as yet unidentified man that was recorded by a bank manager. Based on that information, I ran a RI DMV query and learned that a 2001 blue Dodge minivan with RI Plate number [REDACTED] was registered to Canuelas (the blue minivan). She also had a green 2003 Ford Expedition bearing RI Plate number [REDACTED] registered to her (the green Expedition).

16. I ran a DMV license check and was able to obtain a copy of the driver's license issued to Canuelas (# [REDACTED]). In this way, I obtained Canuelas's photograph to compare with the images in bank and store surveillance. Each time I refer to an act being committed by Canuelas it is because I compared the person depicted in the security photographs to the photograph I have of Canuelas. I believe the same woman is depicted in each photograph and appeared to me to be Canuelas.¹

¹ I further note that while Canuelas wore scarves, hats, sunglasses or other items of apparel in different ways on different days, the individual items of apparel were also identical across some of the surveillance photographs.

17. Queries of investigative databases indicated Canuelas' residence was located at 1002 Atwells Avenue, Providence, RI.² I conducted several surveillances at that address and observed the blue minivan parked adjacent to that building in a driveway on Erastus Avenue. I also noticed the same man, who appeared in the surveillance footage with her, driving the blue minivan registered to Canuelas on Erastus Avenue and on Manton Avenue, near Atwells Avenue. I observed the blue minivan parked in a driveway adjacent to 1002 Atwells Avenue on several occasions. I also observed the green Expedition parked in a driveway adjacent to 1002 Atwells Avenue and parked in close proximity to 1002 Atwells Avenue.

18. In order to identify that man, on April 28, 2015 Detective Ludovici utilized a Providence Police Officer to attempt to learn who he was. The uniformed patrol officer knocked on the door to the apartment at 1002 Atwells Avenue and that same man (soon to identify himself as Tirado) answered. The officer told the man that he was investigating reports of fighting in the area and asked if he had witnessed any such incidents.³ The officer asked Tirado his name; purportedly to attribute and record his response. Tirado verbally provided his name and displayed a Florida driver's license bearing his name and a photograph of him.

19. I used Tirado's information to query the National Law Enforcement Telecommunications System (NLETS) for his Florida license information and to obtain a picture of him. In that way I verified that he is the man I saw with Canuelas in the many videos and photographs I examined during this investigation. Each time I refer to an act being committed by Tirado it is because I compared the person depicted in the security images to the photograph I have of Tirado. I believe the same man is depicted in each photograph and appeared to me to be Tirado.

The [REDACTED] and [REDACTED] Treasury Checks

20. During the course of this investigation, I determined that the endorsements of several U.S. Treasury checks had been forged and deposited into accounts at [REDACTED] Bank.

² That is a different address than the one appearing on her license.

³ There had been reports of violence in the neighborhood but the purpose of the visit was to obtain the man's identity.

Bank security personnel were simultaneously detecting and internally investigating a number of suspicious accounts and transactions related to this scheme. One stolen Treasury check belonged to Robert ().

21. is a Government employee, who contacted me and told me that on or about November 26, 2014, he had requested a disbursement of \$10,500 from his Government Thrift Savings Plan (TSP) retirement account. In response, on December 1, 2014, the United States Treasury issued a Treasury check, (#) in the amount of \$10,450 and mailed it to at his home address in Charlestown, RI (Treasury check). However, never received the check.

22. I determined that the Treasury check was deposited on December 22, 2014 at a Bank branch in Providence. The account (#) had been recently opened in a slightly altered form of 's name as "Robert " missing the "v" in the proper spelling of his name (account). told me that he did not open the account and did not make withdrawals or deposits to the account. However, he had received a bank statement from the " " account at his home address.

23. I reviewed Bank's surveillance photographs for December 22, 2014 at the time the Treasury check was deposited into the account and determined that the deposit was made by Tirado.

24. An unidentified male (John Doe #1) presented a RI driver's license (#) to open the account and supplied the bank with 's real home address using the slightly misspelled last name and a date of birth of March 26, 1976 (which is not 's birthday). The bank recorded the license number but did not take a copy of the license that was presented.

25. I ran an NLETS check of that license. The number was assigned to an expired RI driver's permit; not to a RI driver's license. The permit number was associated with a valid RI license (#) issued to with a different date of birth at a street address in Pawtucket, RI; not to in Charlestown. I compared the photograph on the license and it did not match the bank footage of John Doe #1, Tirado, nor himself. I therefore concluded that the license presented to the bank to open the account was an altered or forged license. Although the bank did not take a copy, presumably the license presented by John Doe #1 contained

██████████'s misspelled name and home address but a picture of John Doe #1 as proof of identity to open the account.

26. A second stolen Treasury check was also deposited into the ██████████ account. On February 6, 2015, Michelle ██████████ (██████████) told me that she had asked for a TSP disbursement in the amount of \$5,000. On or about December 1, 2014, the United States Treasury issued a Treasury check (# ██████████) in the amount of \$4,950 addressed to ██████████'s P.O. Box in Albion, RI (the ██████████ Treasury check). However, ██████████ never received the check.

27. Instead, bank records and video showed that on January 7, 2015, the ██████████ Treasury check was also deposited into ██████████ account. The check was simply endorsed "Michelle ██████████" and deposited over the counter. ██████████ Bank surveillance revealed that the check was deposited by Tirado.

28. According to ██████████ Bank investigator ██████████, a total of \$15,400 was deposited in the ██████████ account and \$11,047.60 was withdrawn in a combination of ATM withdrawals and debit card purchases. Bank account records revealed that several of the debit card purchases were made at two Walmart stores in Providence and Cranston, RI.

29. Walmart provided me with photographs and transaction information for purchases made at those Walmart stores on December 23, 2014, December 24, and December 26, using the ██████████ Bank debit card associated with the ██████████ account.

30. The December 23, 2014, transaction was for the purchase of a \$1,000 money order and an \$800 money order. Walmart video surveillance showed Tirado and Canuelas making those purchases. Walmart surveillance video also captured Tirado and Canuelas leaving the Walmart parking lot in a Ford Expedition.

31. The December 24, 2014 Walmart transaction involved the purchase of a \$1,000 money order and a \$900 money order. Walmart surveillance video showed that Tirado conducted those transactions.

32. The December 26, 2014 transaction consisted of a \$1,000 and a \$900 money order purchase. Walmart surveillance video showed Canuelas making the purchases.

Surveillance video further captured Tirado and Canuelas shopping together in Walmart that day.

The [REDACTED] Treasury Check

33. Raymond [REDACTED] ([REDACTED]), a [REDACTED] who is also employed at the Providence Processing and Distribution Center, informed me that he had requested a TSP disbursement on November 26, 2014. On December 1, 2014 the United States Treasury issued Treasury check (# 4 [REDACTED]) in the amount of \$11,500, addressed to [REDACTED] at his home address in Riverside, RI ([REDACTED] Treasury check). [REDACTED] told me that he never received his check in the mail.

34. Instead, I found that bank records established that the [REDACTED] Treasury check was deposited into a [REDACTED] Bank, account ([REDACTED] account). Like the [REDACTED] account, the [REDACTED] account (# [REDACTED]) was opened in [REDACTED]'s name but with a slightly altered spelling of his first name, "Reymond" spelled with an "e" rather than spelled properly as "Raymond" with an "a." [REDACTED] Bank records established that the [REDACTED] account was opened in Warwick, RI. Like the [REDACTED] account, John Doe #1 made a deposit into the [REDACTED] account at the same branch in Providence.

35. [REDACTED] Bank surveillance and account records showed that the [REDACTED] account was also opened by John Doe #1 using a Rhode Island driver's license (# [REDACTED]) and the name Reymond [REDACTED] with [REDACTED]'s correct home address. I ran a check of that RI license. It was also an expired driver's permit number; not a driver's license number. The expired permit number was associated with a RI driver's license (# [REDACTED]) registered to Louise [REDACTED], of Providence; not to Reymond [REDACTED] or Raymond [REDACTED] of Riverside. Although the bank did not take a copy, presumably the license presented by John Doe #1 contained [REDACTED]'s misspelled name and home address but a picture of John Doe #1 as proof of identity to open the account.

36. According to [REDACTED] Bank Investigator [REDACTED], a total of \$11,047.60 was deposited into the [REDACTED] account, and a total of \$11,047.60 was withdrawn from the account in a combination of several ATM withdrawals and debit card purchases. Most of the debit card purchases were made at the same two Walmart stores in Providence and Cranston where Canuelas and Tirado had purchased money orders using the [REDACTED] account debit card. However in this instance, Walmart records and surveillance showed that the purchases were made by an otherwise unidentified older Hispanic man.

The [REDACTED] and [REDACTED] Treasury Checks

37. On February 17, 2015, [REDACTED] Bank Investigator [REDACTED] provided me with information, documents and photographs regarding two other suspicious bank accounts that Canuelas opened. One was in the name of Carmen [REDACTED] ([REDACTED] account) and the other in the name Cruz [REDACTED] ([REDACTED] account).
38. Bank surveillance records and photographs showed that Canuelas opened the [REDACTED] account on January 23, 2015 at the [REDACTED] Bank branch in Wrentham, MA. Canuelas opened the account under the name of Cruz [REDACTED], with an address of [REDACTED] [REDACTED] Jersey City, NJ 07307. Canuelas presented a New Jersey license (# [REDACTED]) while opening the account to prove her identity. I checked with the New Jersey Motor Vehicle Commission, Security and Investigations Office and was informed that there is no record of any New Jersey license issued with that number. Although the bank did not take a copy, presumably the license presented by Canuelas contained [REDACTED]'s name and the New Jersey address but a picture of Canuelas as proof of identity to open the account.
39. Bank records and photographs showed that on January 23, 2015 Tirado deposited a Treasury check (# [REDACTED]) issued to Cruz [REDACTED] in the amount of \$4,261 into the [REDACTED] account at a different [REDACTED] Bank branch; this one located in North Attleboro, MA. That Treasury check was actually mailed to [REDACTED] Ortiz, who has not been interviewed, at a different address in Tampa, FL. I am also informed that when Tirado deposited the [REDACTED] Treasury check, alert [REDACTED] Bank employees observed him leave in the blue minivan and correctly noted its RI license plate number. [REDACTED] Bank investigator [REDACTED] told me that a total of \$4,261.00 was deposited into the [REDACTED] account, and \$96.00 was withdrawn from the [REDACTED] account before it was frozen.
40. The [REDACTED] account (# [REDACTED]) was opened on January 8, 2015 by a female who again appeared to be Canuelas in the surveillance footage. This time she used a Pennsylvania driver's license (# [REDACTED]) in the name Carmen [REDACTED]. She also provided Social Security Number [REDACTED] and a date of birth of October 16, 1976. That birth date is one year off from, Canuelas's actual birthday [REDACTED].
41. I queried NLETS regarding Pennsylvania driver's license # [REDACTED]. The license bearing that number was issued to [REDACTED] ([REDACTED]) at an address in

Shenandoah, PA with a different date of birth and a different social security number. I viewed the driver's license photograph of [REDACTED] and determined that [REDACTED] was actually an African American male, not a Hispanic female. Although the bank did not take a copy, presumably the Pennsylvania license with [REDACTED]'s license number on it presented by Canuelas contained [REDACTED]'s name but a picture of Canuelas as proof of identity to open the account. [REDACTED] Bank investigator [REDACTED] told me that a total of \$6,453.00 was deposited in the [REDACTED] account, and \$6433.38 was withdrawn from the account.

The [REDACTED] Treasury Check

42. During the course of the investigation, [REDACTED] Bank investigator [REDACTED] also advised me that on February 13, 2015, Canuelas and Tirado opened another checking account at [REDACTED] Bank (# [REDACTED]) in the name of Ryan [REDACTED] ([REDACTED] Account). Bank surveillance video depicted the persons I have come to recognize as Canuelas and Tirado opening the account. Tirado opened the account using a RI License (# [REDACTED]) to prove his identity and provided a date of birth of May 20, 1970. I ran an NLETS check and obtained a copy of that RI license. The real license belongs to Anthony [REDACTED], a white male, with a different address, and a different date of birth. Although the bank did not take a copy, presumably the license presented by Tirado contained [REDACTED]'s name but a picture of Tirado as proof of identity to open the account.

43. On February 16, 2015, bank surveillance video captured Canuelas depositing a Treasury check (# [REDACTED]) issued in the name Ryan [REDACTED] for \$9030.00 into the [REDACTED] account. [REDACTED] has not yet been interviewed. Surveillance video also captured Canuelas making a \$100 cash ATM withdrawal moments later. [REDACTED] Bank investigator [REDACTED] told me that a total of \$9,030.00 was deposited into the account, and a total of \$9,030.00 was withdrawn from the account.

44. Wal-Mart records established that the [REDACTED] Bank debit card associated with the [REDACTED] account was used to purchase Walmart money orders on February 18 and 19, 2015 in the amounts of \$1000 and \$900 each, on both days. Walmart surveillance video depicted Tirado and Canuelas conducting the transactions and leaving the store.

The [REDACTED] Treasury Check

45. During the course of the investigation, I learned that [REDACTED] Bank records and surveillance video established that on March 21, 2015 a bank account (# [REDACTED]) was opened in the name of Rachel [REDACTED] (the [REDACTED] account). Bank surveillance

video showed an unidentified female opening the account. She opened the account using a RI Driver's License (# [REDACTED]). I ran an NLETS check of that RI license and learned that no record exists for that number.

46. [REDACTED] Bank records reflected that two days later, on March 23, 2015, a Treasury check (# [REDACTED]) was deposited into the [REDACTED] account. I have not interviewed Rachel [REDACTED] but I am aware that she made a complaint to the Rhode Island State Police about this matter. But I have confirmed that a Treasury check was issued in the amount of \$9,724 to Rachel [REDACTED] and mailed to an address in Exeter, RI. [REDACTED] Bank investigator [REDACTED] told me that a total of \$9,749 was deposited into the [REDACTED] account, and \$6,775.83 was withdrawn from the account.

47. [REDACTED] Bank records established that the debit card associated with the [REDACTED] account was used on March 25 and March 26, 2015 to purchase two Walmart money orders, both in the amount of \$1950. Surveillance video again captured Canuelas and Tirado making the purchases with the [REDACTED] account debit card and shopping in the store. Walmart video surveillance established that Canuelas and Tirado left in a green Expedition with a license plate partially visible in the picture. It began with the numbers 44. Canuelas's license plate begins with the numbers 44.

Conclusion

48. Based upon the foregoing facts, I suggest that there is probable cause to conclude from on or about December 22, 2014, to on or about, March 26, 2015, Brenda Canuelas and Secundino Velazquez Tirado were involved in a conspiracy together and with others identified and as yet unidentified: to steal, receive and possess articles stolen from the U.S. Mails; to steal public monies; to defraud banks; to forge endorsements on Treasury checks; and to knowingly steal identities of others; all in violation of 18 U.S.C. § 371. As well as probable cause to charge them with: Theft of Mail, in violation of 18 U.S.C. §1708; Theft of Public Money or Property in excess of \$1000, in violation of 18 U.S.C. §641; Forging Endorsements on Treasury Checks in excess of \$1000, in violation

of 18 U.S.C. § 510; Bank Fraud, in violation of 18 U.S.C. §1344 and; Aggravated Identity Theft, in violation of 18 U.S.C. §1028A(a)(1).

SPECIAL AGENT, ANTHONY MATARESE
UNITED STATES POSTAL SERVICE, OIG

SUBSCRIBED and SWORN
before me this _____ day of May 2015

PATRICIA A. SULLIVAN
UNITED STATES MAGISTRATE JUDGE