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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
v. :  
RICHARD LeBLANCA, :  
BRIAN CHECO, :  
GABRIEL VARGAS, :  
LUIS R. MORALES, :  
ANSELMO JIMENES, :  
a/k/a "Ansemo Jimenes" :  
ALAN A. BANNOUT, : Mag No. 10-6023  
ORLANDO GARCIA and :  
FNU LNU, :  
a/k/a "Mike Smith" :

I, the undersigned complainant, 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, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

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Michael L. Bronisz, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
March 4, 2010, at Newark, New Jersey

HONORABLE MICHAEL A. SHIPP  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

ATTACHMENT A

On or about February 9, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendants

RICHARD LeBLANCA,  
BRIAN CHECO,  
GABRIEL VARGAS,  
LUIS R. MORALES,  
ANSELMO JIMENES, a/k/a "Ansemo Jimenes,"  
ALAN A. BANNOUT,  
ORLANDO GARCIA and  
FNU LNU, a/k/a "Mike Smith"

and others known and unknown, did knowingly and willfully conspire and agree to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

In violation of Title 18, United States Code, Section 1951(a).

ATTACHMENT B

I, Michael L. Bronisz, a Special Agent of the Federal Bureau of Investigation ("FBI"), am familiar with the facts set forth herein through my personal participation in this investigation and through oral and written reports from other federal agents or other law enforcement officers. Where statements of others are related herein, such statements are related in substance and in part. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. At all times relevant to this Complaint:

a. Defendants RICHARD LeBLANCA and BRIAN CHECO (hereinafter, "defendant LeBLANCA" and "defendant CHECO," respectively) were both employed as patrolmen in the 34<sup>th</sup> Precinct of the New York Police Department ("NYPD"), which covered the areas of Washington Heights and Inwood in New York City.

b. Defendant GABRIEL VARGAS (hereinafter, "defendant VARGAS") was an acquaintance and co-conspirator of the defendants.

c. Defendant LUIS R. MORALES (hereinafter, "defendant MORALES") was an acquaintance and co-conspirator of the defendants.

d. Defendant ANSELMO JIMENES, a/k/a "Ansemo Jimenes," (hereinafter, "defendant JIMENES") was an acquaintance and co-conspirator of the defendants.

e. Defendant ALAN A. BANNOUT (hereinafter, "defendant BANNOUT") was an acquaintance and co-conspirator of the defendants.

f. Defendant ORLANDO GARCIA (hereinafter, "defendant GARCIA") was a former NYPD officer and an acquaintance and co-conspirator of the defendants.

g. Defendant FNU LNU, a/k/a "Mike Smith," (hereinafter, "defendant LNU") was an acquaintance and co-conspirator of the defendants.

h. In Style USA, Inc., a distributor of various high-end perfumes and fragrances, was a corporation that operated and maintained a warehouse located in Carlstadt, New Jersey (hereinafter, "the Storage Facility"). In Style USA, Inc. used the Storage Facility for, among other purposes, storage of various types of perfume that was sold at an In Style USA site located in Manhattan.

i. A certain individual (hereinafter, "Victim #1") was the owner and general manager of the Storage Facility operated by In Style USA, Inc.

2. On or about February 9, 2010, defendants LeBLANCA, CHECO, BANNOUT, GARCIA and LNU visited a truck rental facility located in Jersey City, New Jersey (hereinafter, "the NJ Truck Rental Facility") to pick up two yellow box trucks that were previously reserved for rental. According to a rental representative, defendants LeBLANCA, CHECO and LNU indicated, in substance and in part, that they were supposed to pick up trucks that had been reserved by defendant LNU. At the time of the pickup, the NJ Truck Rental Facility obtained identifying information from defendants LeBLANCA's and CHECO's driver's licenses, and required that the rental trucks be paid for prior to their release. A subsequent check of these driver's license numbers against New York Department of Motor Vehicles ("NYDMV") records reveals that the license numbers recorded by the NJ Truck Rental Facility were the same as the license numbers for defendants LeBLANCA and CHECO in NYDMV records. Defendant LeBLANCA paid approximately \$205.79 for rental of one of the trucks with a Visa ATM debit card subscribed and billed to defendant LeBLANCA at 70 Pitt Street, Apt. 18B, New York, New York (According to NYDMV and NYPD records, this is defendant LeBLANCA's home address). Defendant LeBLANCA also attempted to pay for the rental of the second truck with the same debit card, but the transaction was declined due to insufficient funds. Thereafter, according to the rental representative, at defendants LeBLANCA's and LNU's request, defendant GARCIA paid approximately \$205.79 for rental of the second truck with a Visa ATM debit card subscribed and billed to defendant GARCIA at 61 Jackson Street, Apt. 6F, New York, New York (According to NYDMV records, this is defendant GARCIA's home address).

3. Prior to their departure, defendant LeBLANCA requested that he and defendant CHECO be permitted to leave their vehicles at the NJ Truck Rental Facility lot while utilizing the rental trucks - a red Ford Mustang and a silver BMW with a New York license tag bearing the last four digits "2669," according to a rental representative. The rental representative advised

defendants LEBLANCA, CHECO and GARCIA that they could not leave their vehicles due to a company policy that prohibited storage of vehicles on the property. Thereafter, the defendants left the NJ Truck Rental Facility with the two rental trucks and the aforementioned vehicles. According to the rental representative, defendants LeBLANCA and CHECO each drove away a truck, while defendants LNU and GARCIA drove away the BMW and Ford Mustang, respectively. Defendant BANNOUT left in one of the two rented trucks as a passenger. A records check with the NYDMV revealed that a silver 2003 BMW 530i, bearing license tag EHP 2669, was registered to defendant CHECO.

4. On or about the same date, according to rental representatives, defendants VARGAS, MORALES and LNU visited another truck rental facility located in Brooklyn, New York (hereinafter, "the NY Truck Rental Facility") to rent approximately three white box trucks. At the time of the pickup, the NY Truck Rental Facility obtained a copy of defendant VARGAS's driver's license, and defendant VARGAS also paid approximately \$781.36 in cash to rent the trucks. A NYDMV records check revealed that this was an authentic copy of defendant VARGAS's driver's license.

5. Shortly thereafter, defendants VARGAS and MORALES were joined by defendant JIMENES and approximately 16 day laborers (hereinafter, "the Day Laborers") recruited by defendant JIMENES, at the NY Truck Rental Facility. Defendant JIMENES and the Day Laborers were then transported by defendant VARGAS to a motel located in Jersey City, New Jersey (hereinafter, "the Motel"), while defendant MORALES drove one of the other trucks. Defendant BANNOUT, who had arrived at the NY Truck Rental Facility from New Jersey, drove the third truck. Upon arriving at the Motel, defendant VARGAS provided defendant JIMENES cash to temporarily rent three rooms at the Motel. Law enforcement officers have obtained a copy of the receipt from the Motel that indicates defendant JIMENES rented three motel rooms for approximately \$200 cash. According to the accounts of some of the Day Laborers, after approximately a few hours, defendants VARGAS, MORALES, JIMENES, BANNOUT and the Day Laborers drove to a location in close proximity to the Storage Facility.

6. At approximately 6:20 p.m., on or about February 9, 2010, according to several employees working at the Storage Facility, defendants LeBLANCA and CHECO entered the Storage Facility office and began yelling "NYPD! Hands up!" while brandishing black-colored firearms and displaying law enforcement badges. Defendants LeBLANCA and CHECO were soon joined by defendants VARGAS, GARCIA and at least one other unidentified

male, who assisted defendants LeBLANCA and CHECO in restraining Victim #1's and approximately 10 other In Style USA employees' (hereinafter, collectively referred to as "the Victims") hands behind their backs with plastic ties. According to several of the Victims, they could hear trucks being loaded in the loading dock area of the Storage Facility.

7. At one point during the robbery, one of the co-conspirators advised the Victims, in substance and in part, that they were from the NYPD and that they were performing a routine "inspection" of the Storage Facility. According to Victim #1, Victim #1 questioned why the Victims had to be forcibly restrained if the co-conspirators were performing a legitimate police inspection. In response, Victim #1 was taken to speak privately with one of the co-conspirators, where this individual presented his badge to Victim #1 and advised Victim #1, in substance and in part, that he was the "chief" of the operation. This co-conspirator then ordered Victim #1 to give him any surveillance equipment utilized by the Storage Facility, along with any cash maintained in the company's cash drawer. Victim #1 complied with the co-conspirator's order, turning over a white DVR computer unit capable of monitoring and recording images. Victim #1 also stated that a computer unit and monitor were taken, along with approximately \$3,000 to \$4,000 that was contained in the cash drawer.

8. While defendants LeBLANCA, CHECO, VARGAS and GARCIA carried out the aforementioned armed robbery, defendants MORALES, BANNOUT, JIMENES and LNU, along with the Day Laborers, loaded hundreds of brown boxes, all containing various types of perfumes and fragrances, into the trucks on site at the Storage Facility. According to several of the Day Laborers, defendant MORALES first opened several of the boxes to determine which of the boxes would be loaded onto the trucks. Due to limited space at the Storage Facility loading dock, each truck was loaded with boxes in single fashion. Defendants BANNOUT and an unidentified male each drove a truck from the Storage Facility once they had been loaded with boxes by defendants MORALES, BANNOUT, JIMENES, LNU and the Day Laborers.

9. As the merchandise was being loaded, an eyewitness indicated that three of the defendants departed the Storage Facility in a silver BMW 530i, which matched the description of the vehicle registered to defendant CHECO and seen at the NJ Truck Rental Facility. Two of the defendants departed in a red Ford Mustang that matched the description of the other vehicle seen at the NJ Truck Rental Facility. An unidentified male also was observed driving away in a silver GMC Yukon with New York

license tags. A subsequent records check with the NYDMV confirmed that a silver 2007 GMC Yukon, bearing license tag DDD1909, was registered to defendant BANNOUT.

10. At approximately 9:30 p.m., Carlstadt police officers reported to the Storage Facility after receiving a 9-1-1 call concerning the robbery. A Carlstadt police officer who first responded to the scene was approached by an unidentified black male (hereinafter, "the Individual") prior to entering the Storage Facility. The Individual indicated to the officer, in substance and in part, that he was NYPD from the 34<sup>th</sup> Precinct, and that he needed assistance in returning to New York City. The officer then directed the Individual to a nearby bus line. Immediately after the Individual departed, the officer heard an alarm sound inside and entered the Storage Facility.

11. According to the Victims inside the Storage Facility, upon encountering the officer, one of the laborers shouted "Policia!", and the remaining defendants attempted to flee the scene. Defendant MORALES was arrested after attempting to hide in a trash receptacle near the Storage Facility. Defendant JIMENES, at defendant MORALES's direction, locked the Day Laborers in one of the remaining trucks and attempted to flee on foot. Carlstadt police officers, however, arrested defendant JIMENES shortly thereafter. Carlstadt police officers also seized two yellow-colored trucks that contained hundreds of boxes of perfume inventory that was removed from the Storage Facility. Law enforcement officers subsequently confirmed that the two trucks seized at the Storage Facility were the same trucks that were rented by defendants LeBLANCA, CHECO and GARCIA at the NJ Truck Rental Facility.

12. Based on an analysis of In Style USA, Inc. inventory documents, as well as interviews of Storage Facility employees, the estimated total retail value of the boxes of perfume that the defendants endeavored to rob from the Storage Facility was approximately \$1 million. According to In Style USA, Inc. representatives, this perfume was destined for sale in New York City and other locations nationally and internationally.