

Approved: Richard C. Tarlowe/Brent S. Wible
Assistant United States Attorneys

Before: HONORABLE KEVIN NATHANIEL FOX
United States Magistrate Judge
Southern District of New York

10 MAG 3567

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:
UNITED STATES OF AMERICA

SEALED COMPLAINT

- v. -
:
WILCH DEWALT,
a/k/a "Sharrieff Sabazz Muhammad,"
a/k/a "G,"
a/k/a "Mark Fowler,"
a/k/a "License Man,"
ROBIN JONES-WOODSON,
GLENDIA HINTON,
JOSE R. TORRES-MUNOZ,
a/k/a "Paul,"
a/k/a "Roberto,"
a/k/a "Alberto,"
OLGA NIEVES MATOS,
a/k/a "Sarah,"
DAVID RAY CRAVEN,
a/k/a "Max,"
a/k/a "Julius Simons," and
DOUGLAS L. ROPER,
a/k/a "Nicky Roper,"
a/k/a "Nicky Martinez,"
a/k/a "Nick,"
a/k/a "Nate,"

Violations of:
18 U.S.C. §§ 371,
666(a)(1)(B) & (2),
1028(a)(1) & (f),
1028A(a)(1)

COUNTY OF OFFENSE:
NEW YORK/
WESTCHESTER

Defendants.

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:
SOUTHERN DISTRICT OF NEW YORK, ss.:

MARK COZINE, being duly sworn, deposes and says that he is a Senior Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), and charges as follows:

COUNT ONE

(Conspiracy To Commit Identity Fraud)

From in or about 2006, through in or about February 2010, in the Southern District of New York and elsewhere, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," OLGA NIEVES MATOS, a/k/a "Sarah," DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly combined, conspired, confederated, and agreed together and with each other to violate Section 1028(a)(1) of Title 18, United States Code.

It was a part and an object of the conspiracy that WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," OLGA NIEVES MATOS, a/k/a "Sarah," DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly, and without lawful authority, would and did produce an identification document which is transported in the mail in the course of its production, to wit, the defendants produced New York state driver's licenses, learner's permits, and identification cards in stolen identities in exchange for a fee, in violation of Title 18, United States Code, Section 1028(a)(1).

Overt Acts

In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 27, 2009, in New York, New York, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, met with a confidential informant to discuss obtaining DMV identification documents in a fraudulent identity.

b. On or about January 7, 2010, in Yonkers, New York, ROBIN JONES-WOODSON, the defendant, attempted to process a fraudulent DMV application submitted by one of DEWALT's

customers.

c. On or about October 27, 2009, in New York, New York, GLENDA HINTON, the defendant, researched an identity in a DMV database at DEWALT's request to determine whether the DMV had already issued an identification document in that identity.

d. On or about October 27, 2009, in New York, New York, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," the defendant, transferred money to Puerto Rico.

e. On or about January 4, 2010, OLGA NIEVES MATOS, a/k/a "Sarah," the defendant, translated a telephone call between DEWALT and TORRES-MUNOZ regarding documents in a fraudulent identity.

f. On or about January 4, 2010, DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," the defendant, spoke by telephone with DEWALT about obtaining DMV identification documents in a fraudulent identity for a woman CRAVEN knew.

g. On or about January 7, 2010, DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendant, had a telephone call with DEWALT in which he agreed to give DEWALT a Social Security card that day.

(Title 18, United States Code, Section 1028(a)(1) and (f).)

COUNT TWO

(Aggravated Identity Theft)

In or about January 2010, in the Southern District of New York and elsewhere, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," and ROBIN JONES-WOODSON, the defendants, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, the identity fraud conspiracy charged in Count One, unlawfully, willfully, and knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, DEWALT, TORRES-MUNOZ, and JONES-WOODSON each possessed and used the name, date of birth, and Social Security number of another person in connection with the identity fraud conspiracy charged in Count One of this Complaint.

(Title 18, United States Code, Section 1028A(a)(1).)

COUNT THREE

(Conspiracy To Misuse A Social Security Number)

From in or about 2006, through in or about February 2010, in the Southern District of New York and elsewhere, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," OLGA NIEVES MATOS, a/k/a "Sarah," DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Section 408(a)(7)(B) of Title 42, United States Code.

It was a part and an object of the conspiracy that WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," OLGA NIEVES MATOS, a/k/a "Sarah," DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did, and with intent to deceive, falsely represent a number to be the Social Security account number assigned by the Commissioner of Social Security to a person, when in fact such number was not the Social Security account number assigned by the Commissioner of Social Security to that person, to wit, the defendants helped customers for fraudulent identities use Social Security numbers assigned to other people to help those customers apply for New York State driver's licenses, learner's permits, and identification cards under other people's identities, in violation of Title 42, United States Code, Section 408(a)(7)(B).

Overt Acts

In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 27, 2009, in New York, New York, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, met

with a confidential informant to discuss obtaining DMV identification documents in a fraudulent identity.

b. On or about January 7, 2010, in Yonkers, New York, ROBIN JONES-WOODSON, the defendant, attempted to process a fraudulent DMV application submitted by one of DEWALT's customers.

c. On or about October 27, 2009, in New York, New York, GLENDA HINTON, the defendant, researched an identity in a DMV database at DEWALT's request to determine whether the DMV had already issued an identification document in that identity.

d. On or about October 27, 2009, in New York, New York, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," the defendant, transferred money to Puerto Rico.

e. On or about January 4, 2010, OLGA NIEVES MATOS, a/k/a "Sarah," the defendant, translated a telephone call between DEWALT and TORRES-MUNOZ regarding documents in a fraudulent identity.

f. On or about January 4, 2010, DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," the defendant, spoke by telephone with DEWALT about obtaining DMV identification documents in a fraudulent identity for a woman CRAVEN knew.

g. On or about January 7, 2010, DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendant, had a telephone call with DEWALT in which he agreed to give DEWALT a Social Security card that day.

(Title 18, United States Code, Section 371.)

COUNT FOUR

(Bribery)

From in or about 2006, through in or about February 2010, in the Southern District of New York and elsewhere, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, did corruptly give, offer, and agree to give anything of value to a person, with intent to influence or reward an agent of an organization and of a state government and an agency thereof that received in a one-year period benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, to wit, the New York DMV, in connection with a business, transaction, and series of transactions involving a thing of value of \$5,000 and more, to wit, DEWALT paid employees of the DMV to research identities in DMV databases to determine whether a driver's license, learner's permit, or identification document had already been issued in a stolen identity and then to issue an identification document in that identity.

(Title 18, United States Code, Sections 666(a)(2) and 2.)

COUNT FIVE

(Accepting A Bribe)

From in or about 2006, through in or about February 2010, in the Southern District of New York, ROBIN JONES-WOODSON and GLENDA HINTON, the defendants, being agents of an organization and of a state government and an agency thereof that received in a one-year period benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, to wit, the New York DMV, unlawfully, willfully, and knowingly did corruptly solicit and demand for the benefit of a person, and accept and agree to accept, a thing of value, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions involving a thing of value of \$5,000 and more, to wit, HINTON and JONES-WOODSON, while employees of the DMV, accepted payments in exchange for researching identities in DMV databases to determine whether a driver's license, learner's permit, or identification document had already been issued in a stolen identity and then issuing an identification document in that identity, respectively.

(Title 18, United States Code, Sections 666(a)(1)(B) and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

1. I am a Senior Special Agent with ICE and have been personally involved in the investigation of this matter. This investigation has been conducted by ICE, the New York City Police Department ("NYPD"), the New York State Department of Motor Vehicles Division of Field Investigations ("DMV-DFI"), the New York State Inspector General's Office, the Social Security Administration Office of Inspector General, and other law enforcement agencies. The investigation has consisted of, among other things, interviews of confidential sources and cooperating witnesses, physical surveillance, consensual recordings, the review of DMV records, and the court-authorized interception of telephone communications. This affidavit is based upon my investigation, my conversations with other law enforcement personnel, and my examination of reports and other records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. In addition, where quotations are used to describe the contents of intercepted phone communications, those quotations are based on my review of line sheets prepared by the monitoring officers and/or my preliminary review of the recordings, and are subject to revision upon further review of the conversations and receipt of full transcripts.

Overview Of The Scheme To Obtain New York State Driver's
Licenses, Learner's Permits And Identification Cards In Stolen
Identities

2. This case involves an organized scheme to procure New York state driver's licenses, learner's permits and identification cards (collectively, "DMV Documents") for convicted felons, illegal aliens, and others, using stolen identities that belong to real people. In addition, some of the people who purchased the fraudulent DMV Documents then used those licenses and the stolen identities to apply for United States passports in those identities. The participants in this criminal scheme include, among other people, two corrupt DMV employees and WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, the ringleader

of this scheme.¹ The scheme has been ongoing since at least in or about 2006.

3. Other officers and I have identified more than 200 people who applied for and obtained DMV Documents in other people's identities as part of this scheme. As set forth below in paragraph 6(a), WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, typically charged each customer a fee of approximately \$7,000 (and as much as \$10,000) to obtain DMV Documents in other people's identities. It therefore appears that DEWALT has received in excess of \$1,000,000 through this scheme. The people who obtained DMV Documents in other people's identities as part of this scheme included numerous convicted felons. Several of these people are currently serving lengthy prison sentences for other crimes. These customers for fraudulent DMV Documents include, among others, the following:

a. An individual who, shortly before he submitted a fraudulent DMV application in someone else's identity, was featured on the television show "America's Most Wanted" because he was wanted for his alleged involvement in a large-scale drug-trafficking and money-laundering organization and had jumped bail. The same individual subsequently obtained a second fraudulent license in yet another person's identity;

b. A convicted sex offender who obtained a fraudulent license, was sent to prison in Georgia for failing to register as a sex offender, and then attempted to obtain a second fraudulent license within weeks of his release from prison for that offense;

c. An individual who, at the time he applied for a fraudulent license, was on supervised release after serving 70 months in federal prison for a felony narcotics conviction and who had previously been convicted of felonies in California and Arizona for drug and firearms offenses;

d. A convicted felon whose real driver's license had been suspended because of two previous DUI convictions; and

¹ Other agents and I identified DEWALT through surveillance, review of photographs taken in connection with his prior arrests (at least one of which was in the name "Sharrieff Sabazz Muhammad"), and intercepted phone calls in which DEWALT discussed, among other things, financial accounts held in his various names.

e. A convicted felon who is currently serving a federal prison sentence for violating the conditions of his probation and who has been attempting to obtain a new identification document in another person's identity while incarcerated.

4. Also during this investigation, an undercover officer posing as a Pakistani man on the United States' "no-fly" list was introduced to WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant. The undercover told DEWALT that he had previously been deported from the United States and was on the no-fly list. The undercover asked DEWALT for help obtaining an "enhanced" driver's license in a fraudulent identity, which would enable him to travel from the United States to Canada, so that he could then board an airplane to fly to Pakistan. The undercover also asked DEWALT to assist him in obtaining a United States passport in a fraudulent identity. DEWALT agreed, in exchange for a fee, to obtain an enhanced driver's license in a fraudulent identity for the undercover. In response to the undercover's request for a passport in a fraudulent identity, DEWALT said, "one step at a time." In a subsequent telephone conversation with DEWALT, the undercover reminded DEWALT that he was on the no-fly list, and said, "They think I'm some kind of terrorist or something, I don't know." DEWALT responded, "we know about all that."

The New York Department Of Motor Vehicles

5. The New York Department of Motor Vehicles receives a substantial amount of federal funding. For example, it currently has a grant from the United States Department of Homeland Security worth approximately \$2.25 million. This grant covers a three-year period, from in or about June 2008 through in or about May 2011.

The Participants In The Scheme

6. Based on the investigation, including interviews of confidential sources and cooperating witnesses, physical surveillance, consensual recordings, and the court-authorized interception of telephone calls over a cellular telephone used by WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant (the "DEWALT Cellphone"),² I believe that the general modus operandi of the

² The DEWALT Cellphone is subscribed in the name "Mark Fowler."

scheme, and the roles played by the participants in that scheme, were as follows:

a. DEWALT acted as a broker who, in exchange for a fee of approximately \$7,000 (and as much as \$10,000), helped convicted felons, illegal aliens, an undercover officer who claimed to be on the no-fly list, a sex offender, and others obtain DMV Documents in other people's identities. DEWALT served as a one-stop shop for these customers, handling virtually every aspect of the process of obtaining a fraudulent license. A customer paid DEWALT his fee and provided a passport-sized photograph, and DEWALT did the rest. DEWALT typically supplied his customers with a complete "package" of fraudulent identification documents that they could use to submit an application to the DMV in a stolen identity. Those documents usually included a birth certificate, Social Security card, employee identification card, pay stub, W-2, and bank card. DEWALT also provided a bogus certification purporting to show that his customers had completed a driving school course, and even offered a completed written examination so that the customer did not actually have to take the learner's permit test himself or herself.

i. As part of this investigation, thousands of phone calls were intercepted over the DEWALT Cellphone between in or about October 2009 and in or about February 2010. During one such telephone call from an unidentified man in or about October 2009, DEWALT was asked, "who are you?" DEWALT replied, "this is the license man." In a call to another unidentified man in or about January 2010, DEWALT said, "This is license man. You know, your man DMV."

ii. Based on the number of customers who appear to have obtained DMV Documents through DEWALT, it appears that DEWALT has received in excess of \$1,000,000 through this scheme. Additionally, during an intercepted telephone call on or about January 2, 2010, DEWALT told an unidentified male, "I hope I get that million. I hope I get that million, boy. . . . I had 890,000 one time in my life but it didn't work out." In a subsequent telephone call, intercepted on or about January 9, 2010, DEWALT told an unidentified female that he was back at work again and that he was trying to get a million dollars by November.³

³ For several months prior to January 2010, DEWALT was not obtaining DMV Documents for his customers because ROBIN JONES-WOODSON, the defendant, a DMV employee who helped process

iii. As part of the scheme to procure fraudulent DMV Documents for his customers, DEWALT typically purchased birth certificates and Social Security cards bearing other people's names, Social Security numbers, and other personal identification information.⁴

b. JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," the defendant, is one of the people from whom DEWALT purchased stolen personal identification information and documents bearing that personal identification information.

c. DEWALT typically demanded a "deposit" from his customers in exchange for obtaining the stolen identification information. Once DEWALT obtained that information, DEWALT then demanded that the customer pay the remainder of DEWALT's fee in order to complete the process of obtaining a fraudulent DMV document. This is reflected in a phone conversation that took place in or about February 2010 between DEWALT and an unidentified female customer. During that conversation, DEWALT explained that the customer's deposit had gotten her the stolen identification information and certain identification documents, but that she would have to pay the rest of his fee to get her DMV document. DEWALT told her, "Listen, I have your work. If you wanna hold on to some of the work I got for you, I have no problem with that. But I take deposits on my work and when you ready, you can finish it up and I can tell you what to do. . . . I run the store. . . . If you come to a person's store, you pay for the goods, right? . . . Alright, now if you come to the store and you put down the deposit, you get the goods when you

~~applications for DEWALT's customers, was temporarily assigned to a position outside of the DMV office in which she processed applications.~~

⁴ DEWALT had to purchase real Social Security numbers issued to real people because, before issuing an identification card, the DMV verifies that the Commissioner of Social Security actually issued the Social Security number that appears on the DMV application to the person whose name and date of birth appears on the application. For each application that it receives, the DMV sends the name, Social Security number, and date of birth that appears on the application to the Social Security Administration for verification that the number is a real Social Security number that matches the name and date of birth on the application. According to an investigator with DMV-DFI, DMV staff are trained to use this verification system.

pay the balance, right? . . . I sell my packages for 7 G's. . . . You can't do nothing with the stuff I've given you . . . I done gave you the Medicaid card. Everything is ready for you to go in if you had all of your money."

d. Before DEWALT directed his customers to the Yonkers DMV to submit a fraudulent application, DEWALT typically contacted GLENDA HINTON, the defendant, a DMV employee who works in the Traffic Violations Bureau of the DMV office in Harlem, to determine whether the DMV had already issued any documents in the stolen identity. DEWALT provided the stolen name and date of birth to HINTON, and HINTON then queried that information in a non-public DMV database. HINTON then notified DEWALT of the results.

e. For example, on or about December 9, 2009, at approximately 11:51 a.m., DEWALT called HINTON and said, "I'm with a customer right now. I needed to see if there's anything in the computer about two people." DEWALT then provided HINTON two different names and dates of birth. I have learned from an investigator with DMV-DFI that HINTON's computer was used that day to run queries in a DMV database on both of those identities. At approximately 12:05 p.m. that same day, HINTON called DEWALT and informed him that both of the identities he had provided were "okay." DEWALT then told HINTON, "since you by the computer, check out one more for me," and DEWALT provided HINTON another name and date of birth. I have learned from an investigator with DMV-DFI that HINTON's computer was used that day to run a query in a DMV database on that name as well. After DEWALT gave HINTON the name, HINTON replied, "everything good."

f. At DEWALT's request, HINTON also used a non-public DMV database to determine whether (and, if so, when) the DMV had mailed a DMV Document that DEWALT had procured for one of his customers.

g. DEWALT paid HINTON for the services she provided. For example, in a call from in or about October 2009, after HINTON had verified that the DMV had issued a license for one of DEWALT's customers, DEWALT told HINTON, "if I get a chance I'll get me some money today, and I'll see you today, but my pay day supposed to be on Wednesday."

h. Using the personal identification information that DEWALT purchased from TORRES-MUNOZ or other co-conspirators not named herein, DEWALT created and/or obtained additional identification documents containing the personal information associated with the stolen identities. These documents included

phony employee identification cards, pay stubs, and W-2's. In some instances, DEWALT also contacted his bank and requested that the bank issue an additional bank card for his account bearing the name of the stolen identity.

i. Once DEWALT assembled the various fraudulent identification documents for a particular customer, DEWALT typically contacted ROBIN JONES-WOODSON, the defendant, a DMV employee who works in the DMV office in Yonkers, New York, and arranged a time to bring the customer to the Yonkers DMV office to meet with JONES-WOODSON and submit his or her application. JONES-WOODSON is a Motor Vehicle Representative, Grade 9, at the Yonkers DMV; although JONES-WOODSON does not routinely process DMV applications as part of her job responsibilities, JONES-WOODSON processed many of the fraudulent DMV applications submitted by DEWALT's customers. The initials "RJW" appear on many of the DMV applications submitted by DEWALT's customers, indicating that JONES-WOODSON took part in processing the applications.

j. After DEWALT and JONES-WOODSON had arranged a time for DEWALT to bring a customer to the Yonkers DMV office, DEWALT typically accompanied the customer to the Yonkers DMV office, where the customer applied for a permit, driver's license or identification card. As part of the application, the customer used the name, date of birth, and Social Security number associated with an identity stolen from a real person, and used the fraudulent identification documents provided by DEWALT as proof of that stolen identity.

k. At the Yonkers DMV office, DEWALT and the customer typically met with JONES-WOODSON in an area separate ~~from where applications are submitted, and JONES-WOODSON reviewed~~ the customer's fraudulent paperwork. JONES-WOODSON and the customer then separately entered the area where applications are submitted, and the customer typically submitted his or her application to JONES-WOODSON, who helped process the application. For customers applying for a driver's permit, JONES-WOODSON typically completed the answers to the written examination beforehand and then attached the examination to the permit application. Thus, during certain telephone calls intercepted over the DEWALT Cellphone, JONES-WOODSON asked DEWALT whether the applications were going to be in English or Spanish, so JONES-WOODSON would know which version of the examination to complete.

l. DEWALT paid JONES-WOODSON for these services. For example, on or about January 5, 2010, while DEWALT and JONES-WOODSON were discussing several customers for DMV Documents in

fraudulent identities, DEWALT told JONES-WOODSON, "you probably get paid, you probably get paid today." Additionally, on or about January 7, 2010, DEWALT said, in an intercepted telephone call, "Robin made a quick fifteen hundred dollars." As another example, on or about January 14, 2010, DEWALT told JONES-WOODSON that a customer of his had asked, "if he give you extra hundred dollars that he can get in, late today or tomorrow." As a final example, on or about February 11, 2010, while discussing a customer that DEWALT was bringing to JONES-WOODSON, DEWALT told JONES-WOODSON, "we right outside. So I'll see you when you come out to get your money."

m. Applicants for a driver's license must pass a driving "road test" before being granted a driver's license. DEWALT frequently scheduled the road tests for his customers. According to DMV records, the DEWALT Cellphone was used to schedule road tests for driver's license applicants over 40 times between in or about 2006 and in or about February 2010.

n. In addition to providing his customers with the fraudulent identification documents to apply for driver's licenses, DEWALT also obtained documentation attesting to his customers' completion of a driver's education course - a prerequisite to obtaining a driver's license - even though the customers had not completed such a course.

7. OLGA NIEVES MATOS, a/k/a "Sarah," the defendant, appears to be a girlfriend of WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, and was another participant in this illegal scheme. Among other things, NIEVES MATOS provided instructions to DEWALT's customers, particularly those who were Spanish-speaking, as to how to obtain their fraudulent DMV Documents from the Yonkers DMV. NIEVES MATOS also spoke by telephone on DEWALT's behalf with JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," the defendant, one of DEWALT's suppliers of stolen identities.

8. DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," the defendant, acted as a broker who directed customers of his who were seeking fraudulent DMV Documents to WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant. For example, in a telephone call on or about December 31, 2009, DEWALT told CRAVEN, "My people is back at work," referring to ROBIN JONES-WOODSON, the defendant. DEWALT then asked CRAVEN to "text" him identification information for a woman who wanted to purchase DMV documents from DEWALT. Later that same day, DEWALT and CRAVEN

discussed the day that the woman would go to the DMV, and DEWALT explained, "because I got the girl who help us, Robin." Subsequently, on or about January 4, 2010, DEWALT and CRAVEN discussed the woman going to the DMV the following day. DEWALT explained, "She's going to give you your thing, the five-hour class or early road test, and your girl will have to do nothing. She get all her stuff included." In that same call, DEWALT also referred to several other customers that CRAVEN planned to bring to him.

9. DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendant, also acted as a broker who directed customers of his who were seeking fraudulent DMV Documents to WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, and assisted DEWALT by providing, among other things, Social Security cards that DEWALT's customers then used when applying for fraudulent DMV Documents. ROPER has prior convictions, including convictions involving the use of forged documents.⁵

a. In a call from in or about October 2009, ROPER asked DEWALT, "did my man ever call you back?" ROPER then explained that this person had \$5,000 and was "trying to get the deposit and everything together." DEWALT replied, "Hopefully he's ready. If not, I let you handle that. You still get your percent." DEWALT then said, "I need some blank Social Security," and ROPER responded that he had a "guy . . . who makes them, and I know a guy that have blanks."

b. In a call from in or about February 2010, ROPER told DEWALT, "I got my people with me and they need a [unintelligible]." DEWALT told ROPER that his price was "seven," meaning \$7,000. ROPER then said that "they just want a driver's license." DEWALT replied, "I don't break up a package, man. I don't do that. . . . I sell packages, that's what I do."

The Customers

10. Other officers and I have identified dozens of driver's license, learner's permit, and identification card

⁵ I surveilled a meeting in which ROPER was a participant. He was driving a car registered in the name "Douglas Roper." I subsequently ran a criminal history record under that name. The photograph associated with that criminal history sheet depicts the person I have seen on surveillance meeting with DEWALT.

applications (collectively, "DMV Applications") that were processed at the Yonkers DMV office and that appear to have been issued in a name other than the applicant's true name. We have reviewed the photographs taken in connection with these suspect applications, and, in many cases, have identified other people using the same names and personal identifying information. Many of the applications bear the initials "RJW," indicating that ROBIN JONES-WOODSON, the defendant, took part in processing them. In addition, DMV records show that the DEWALT Cellphone was used to schedule a number of the road test appointments for these applications.

11. To date, other law enforcement officers and I have arrested six people who submitted fraudulent DMV applications at the Yonkers DMV office. I have reviewed copies of the processed applications for these six people. Five of these applications bear the initials "RJW," indicating that ROBIN JONES-WOODSON, the defendant, took part in processing the applications. Following their arrests, four of these six people stated that they were not the person they claimed to be on their DMV applications. Fingerprint comparisons show that the other two people also are not the people they claimed to be on their DMV applications.

12. I have learned the following about some of the customers of WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant:

a. On or about July 11, 2006, an individual ("Customer-1") submitted an application for a learner's permit to the Yonkers DMV, using the name and Social Security number of another person ("Victim-1"). The DMV subsequently issued a permit and driver's license to Customer-1 in the name of Victim-1. Customer-1's application bears the initials "RJW," indicating that ROBIN JONES-WOODSON, the defendant, helped process the application. At the time Customer-1 applied for the permit, Customer-1 had previously been convicted in New York of attempted sexual abuse in the first degree and robbery in the first degree, both felony offenses, among other crimes. In addition, in or about June 2008, Customer-1 was convicted in Georgia for failing to register as a sex offender, a felony, and sentenced to 2 years' imprisonment and 8 years' probation. Customer-1 was released from prison in or about December 2009. Approximately two weeks after his release from prison, Customer-1 called DEWALT on the DEWALT Cellphone. During that call, I believe Customer-1 was seeking DEWALT's assistance in obtaining a new license in someone else's name. Customer-1 told DEWALT, "I need something from you. When I got locked up, my thing that you did for me got

lost." Later in the same call, DEWALT told Customer-1, "I can get anything and everything without a problem."

b. On or about July 8, 2008, an individual ("Customer-2") submitted an application for a learner's permit to the Yonkers DMV, using the name and Social Security number of another person ("Victim-2A"). The DMV subsequently issued a learner's permit to Customer-2 in the name of Victim-2A. Customer-2's permit application bears the initials "RJW," indicating that JONES-WOODSON helped process the application. On or about June 21, 2008, shortly before Customer-2 submitted that application to the Yonkers DMV, Customer-2 was featured on the television show "America's Most Wanted" because of his alleged involvement in a large-scale drug trafficking and money laundering organization. Customer-2 had previously been arrested, in or about August 2004, while transporting approximately \$1.4 million in suspected drug proceeds, but was released on bail and later failed to appear for court.

c. In or about January 2009, Customer-2 was arrested along with several other people in the Bronx, New York. At the time of his arrest, law enforcement officers seized more than 1,000 pounds of marijuana. Customer-2 was using Victim-2A's identity and was in possession of the New York driver's license in Victim-2A's name. Customer-2 was released on bail following his arrest.

d. Thereafter, on or about February 18, 2009, Customer-2 submitted a second application to the Yonkers DMV, this time using the name and Social Security number of another person ("Victim-2B"). That application also contains the initials "RJW," indicating that JONES-WOODSON helped process it. Moreover, telephone toll records for that day show that the DEWALT Cellphone was in contact with a cell phone belonging to JONES-WOODSON (the "JONES-WOODSON Cellphone") close in time to when the application was processed. In or about March 2009, after Customer-2 had obtained an identification card in Victim-2B's identity, DEA agents arrested Customer-2 and seized over 200 pounds of marijuana that day.

e. On or about September 8, 2006, an individual ("Customer-3") submitted an application to the Yonkers DMV, using the name and Social Security number of another person ("Victim-3"). This application appears to be in the same handwriting as other applications submitted by DEWALT's customers. The DMV subsequently issued a permit and driver's license to Customer-3 in the name of Victim-3. At the time Customer-3 submitted his application to the Yonkers DMV,

Customer-3 was on supervised release following a 70-month sentence for a felony narcotics conviction. Specifically, in or about 2002, in the United States District Court for the Southern District of New York, Customer-3 was convicted of participating in a narcotics conspiracy involving more than 200 pounds of marijuana. Prior to that, Customer-3 had been convicted in Arizona of criminal possession of a loaded weapon, and had been convicted on felony drug charges in California.

f. On or about May 4, 2006, an individual ("Customer-4") submitted an application for an identification card to the Yonkers DMV, using the name and Social Security number of another person ("Victim-4"). Thereafter, the DMV issued an identification card to Customer-4 in the name of Victim-4. Customer-4's application bears the initials "RJW," indicating that JONES-WOODSON helped process the application. Customer-4 is an alien who is present in the United States illegally. Customer-4 previously attempted to enter the United States in October 2000 using a fraudulent British passport in another name, but was not allowed into the country. After obtaining the DMV documents in the fraudulent identity, Customer-4, who is a citizen of Jamaica, applied for a United States passport in that stolen identity.

g. Beginning in or about October 2009, a customer of DEWALT's who had previously been convicted of passport fraud in the United States District Court for the Southern District of New York, and was serving a federal prison sentence for violating the conditions of his probation, used his girlfriend to contact DEWALT while the customer was in jail to obtain new fraudulent identification documents. This customer had used numerous prior fraudulent identities.

The Cooperating Witness's Purchase Of A Driver's License In A Stolen Identity

13. In or about September 2009, other officers and I arrested an individual (the "Cooperating Witness" or "CW") who was subsequently charged with misuse of a social security number and aggravated identity fraud, in violation of Title 42, United States Code, Section 408 and Title 18, United States Code, Section 1028A, respectively.⁶ At the time of the CW's arrest,

⁶ The CW was charged in a Complaint filed in the United States District Court for the Southern District of New York. S/he has been cooperating in the hope of obtaining a cooperation agreement and leniency at sentencing. The information that the CW has

the CW had in his/her possession, among other items, a New York state identification card, New York state learner's permit, and a Social Security card, all in the name of another person ("Victim-5"). The CW had previously been convicted in New Jersey of felony possession of marijuana. In addition, the CW had been issued a New Jersey driver's license in his/her real name, but that license was suspended because the CW was twice convicted of driving under the influence of alcohol.

14. Following his/her arrest, the CW stated, in substance and in part:

a. The CW had paid a person named "G" a total of approximately ten-thousand dollars to help him/her obtain a New York state driver's license in another name because his/her driver's license had been suspended. Thereafter, the CW met "G" outside the DMV office in Yonkers, where "G" gave the CW a Puerto Rican birth certificate, a Social Security card, and other identification documents in another person's identity. "G" introduced the CW to a female DMV employee who processed the CW's DMV application that day and gave him/her a temporary identification card.

b. On a later occasion, the CW again met "G" at the Yonkers DMV office, this time in order to obtain a learner's permit. The DMV employee who had processed the CW's identification-card application also processed the CW's permit application. The CW was provided a written permit test that had already been completed with the answers.

c. Subsequently, in or about mid-September 2009, "G" arranged for the CW to take a road test in order to get a driver's license. ~~In connection with the CW's application for a driver's license, "G" took the CW to a driver's education school where the CW was provided with a certification that s/he had completed the required driver's education program even though, in reality, the CW had not done so.~~

15. Other officers and I showed the CW photographic arrays including photographs of WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," and ROBIN JONES-WOODSON, the defendants. The CW identified the photograph of DEWALT as "G." The CW also identified the photograph of JONES-WOODSON as the DMV employee who had processed

provided has proven reliable and has been corroborated by other information obtained during the course of this investigation.

his/her applications at the Yonkers DMV office.

16. I have reviewed a copy of the identification-card application the CW submitted to the DMV in or about July 2009. The application contains the name and Social Security number of Victim-5, and bears the initials "RJW," indicating that ROBIN JONES-WOODSON, the defendant, took part in processing it. In addition, DMV records show that, on or about August 11, 2009, the DEWALT Cellphone was used to schedule a road test for the driver's license application in the name of Victim-5.

17. On or about September 17, 2009, following his/her arrest and at the direction and under the supervision of law enforcement officers, the CW made a consensually recorded telephone call to WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, in which DEWALT and the CW discussed the CW picking up his/her driver's license. DEWALT told the CW that he would contact the CW as soon as the license arrived.

18. On or about September 28, 2009, again at the direction and under the supervision of law enforcement officers, the CW made two consensually recorded telephone calls to WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, in which they discussed the CW paying DEWALT additional money for the fraudulent driver's license. In the first call, DEWALT said, "I got the thing," meaning that he had the driver's license. In the second call, the CW told DEWALT that s/he had paid DEWALT "close to ten stacks," meaning almost \$10,000. DEWALT told the CW to wire him \$200 via Western Union addressed to "Mark Fowler," and then DEWALT would tell the CW "where to pick up the thing."

19. Thereafter, at my direction, the CW wired \$200 to WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant. In addition, the CW made several more consensually recorded telephone calls to DEWALT in which they discussed arrangements for the CW to pick up the driver's license. On or about October 8, 2009, at DEWALT's direction, and while still under the supervision of law enforcement agents, the CW picked up the driver's license from a woman subsequently identified as OLGA NIEVES MATOS, a/k/a "Sarah," the defendant. The driver's license bears a photograph of the CW, but Victim-5's name and date of birth. During the meeting between the CW and NIEVES MATOS, the CW paid NIEVES MATOS, who said, "he [DEWALT] told me you were going to give me

two hundred."⁷

The Confidential Informant's Purchase Of A DMV Document In A
Stolen Identity

20. On or about October 27, 2009, the CW and a confidential informant (the "CI") met with WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, and an individual subsequently identified as JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," the defendant, in New York, New York.⁸ The CI was purporting to be an associate of the CW's who was interested in purchasing a driver's license in someone else's identity. During that meeting, which was recorded and surveilled by other officers and me, DEWALT told the CW and the CI that TORRES-MUNOZ helps him obtain other people's identities. Specifically, DEWALT pointed out TORRES-MUNOZ and said, "You see my boy over there? Right there in the jacket. Right here?" DEWALT then continued, "He the one gonna get the papers for me, man."

21. Thereafter, the CI spoke to and met with WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, on multiple occasions. Other officers and I surveilled those meetings, and the CI recorded the conversations that took place during those meetings. In addition, the telephone conversations between the CI and DEWALT were recorded by the CI or through the court-authorized interception of the DEWALT Cellphone. Based on

⁷ After the CW met with NIEVES MATOS on or about October 8, 2009, other agents and I looked through all of the DMV Documents that had been mailed to DEWALT's Manhattan apartment and identified one DMV photograph that appeared to depict the woman with whom the CW had met that day. That photograph was on file with the DMV under the name "Olga Nieves Matos." The CW was shown a photograph array that included that photograph, and identified the person depicted in the photograph as the person who had given him/her the driver's license on or about October 8, 2009.

⁸ The CI is an alien who does not have legal immigration status in the United States. The CI has been assisting ICE in exchange for deferred action status. The CI has proven reliable in other investigations, and the information he has provided in this investigation has been corroborated through other investigative methods, including physical surveillance, consensual recordings, and Court-authorized interception of wire communications.

that surveillance and those recorded conversations, I believe, as detailed more fully below, that DEWALT purchased a stolen identity for the CI from JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," the defendant, and then, with the assistance of GLENDA HINTON, ROBIN JONES-WOODSON, OLGA NIEVES MATOS, a/k/a "Sarah," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, among others, helped the CI apply for a non-driver's identification card using that stolen identity. In particular, I have learned the following:

a. On or about October 27, 2009, following the meeting described in Paragraph 20 above, at approximately 5:11 p.m., DEWALT made a call over the DEWALT Cellphone to the CW in which DEWALT stated, "I'm taking the man up there to send him money to the Western Union, right now. Once the papers come, I'll call you and then we decide on how much we wanna take and how much he owes." Agents then observed DEWALT and TORRES-MUNOZ go to a wire transfer business. I have obtained records from that business showing that TORRES-MUNOZ transferred money to Puerto Rico that day. I believe that TORRES-MUNOZ was wiring money to obtain an identity for DEWALT to provide to the CI.⁹

b. Later that same day, at approximately 8:12 p.m., DEWALT called HINTON to have her determine whether the DMV had issued any DMV documents in the stolen identity that DEWALT planned to use for the CI's license. DEWALT told HINTON, "I need to know if this man is clean. Are you ready?" HINTON replied, "go ahead," and DEWALT then spelled out the name and date of birth of another individual ("Victim-6"). (During this call, DEWALT misspelled Victim-6's name).

c. The following day, at approximately 11:41 a.m., HINTON called DEWALT and let him know that no licenses had been issued in the stolen identity. HINTON said, "It's nothing there, go ahead and do your thing."

⁹ After other agents observed TORRES-MUNOZ go to the wire-transfer business, we obtained records from the business, which show that a person named "Jose R. Torres-Munoz" wired money to Puerto Rico that day at the time we saw TORRES-MUNOZ there. I have also reviewed a photograph on file with the DMV under the name "Jose R. Torres-Munoz." That photograph was included in a photographic array shown to the CW, who identified the person depicted in the photograph as the person with DEWALT on or about October 27, 2009.

d. On or about October 31, 2009, the CI received a telephone call from NIEVES MATOS in which NIEVES MATOS gave the CI the name, date of birth and Social Security number of Victim-6.

e. On or about November 11, 2009, the CI met DEWALT near DEWALT's parking garage in Manhattan, where DEWALT gave the CI a birth certificate and Social Security card in Victim-6's identity.

f. On or about December 31, 2009, the CI called DEWALT. During the call, NIEVES MATOS spoke to the CI in Spanish, appearing to act as a translator for DEWALT. NIEVES MATOS told the CI that DEWALT would let the CI know two days before DEWALT was ready to get him the license so the CI would be ready. NIEVES MATOS also told the CI, "You will go inside the motor vehicle and they will give you something temporary, and then they will send you the license." NIEVES MATOS further stated, "practice your signature . . . make sure that you practice."

g. On or about January 4, 2010, JONES-WOODSON returned to her position at the Yonkers DMV office, after having been temporarily assigned to conduct road tests for driver's license applicants. During that temporary assignment, JONES-WOODSON had not been working in the Yonkers DMV office. While JONES-WOODSON was on that temporary assignment, during a number of intercepted phone calls, DEWALT discussed how he was waiting for JONES-WOODSON to return to her position at the Yonkers DMV office before having his customers submit additional applications for fraudulent DMV Documents. For example, on or about December 10, 2009, during an intercepted phone call, JONES-WOODSON told DEWALT that she was "going back in" (meaning that she would be returning to the Yonkers DMV Office) after the holidays, and DEWALT told JONES-WOODSON that he would have "two or three people ready as soon as the shop opens." Similarly, during a call with a customer on or about December 7, 2009, DEWALT told the customer that the "papers" were ready but that the customer should be patient, explaining that JONES-WOODSON would be back at the Yonkers DMV office the first week of January. DEWALT told the customer that he could do it without JONES-WOODSON, but that he wanted to keep his "business" and his "people" "safe."

h. On or about January 4, 2010, at approximately 2:43 p.m., DEWALT called NIEVES MATOS. DEWALT told NIEVES MATOS to call "Alberto" (who I believe to be JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto") and tell him to get DEWALT a copy of the "sosh" (which I believe was a reference

to a Social Security card) so DEWALT could make sure everything was good before he printed it up. NIEVES MATOS asked, "you need a copy?" DEWALT replied, "of the social and the birth." I believe that DEWALT was seeking copies of the birth certificate and Social Security number that TORRES-MUNOZ was selling to DEWALT, so that DEWALT could prepare and/or obtain additional fraudulent documentation in the name of the stolen identity.

i. Later that same day, at approximately 5:17 p.m., DEWALT called TORRES-MUNOZ. During that call, NIEVES MATOS - who appeared to be translating portions of the call for DEWALT - told TORRES-MUNOZ in Spanish that "he [DEWALT] says to make a copy of the Social He says that he wants to be safe because when he gets the credit card and all those things, everything has to be exactly the same as the Social."

j. On or about January 7, 2010, the CI and an undercover officer ("UC-1") met with DEWALT at a prearranged location in New York, New York. The CI purported to speak only Spanish and told DEWALT that UC-1, who was posing as an associate of the CI's, could translate for him. At DEWALT's direction, the CI, UC-1 and DEWALT went to a Staples store located at West 125th Street in New York, New York. There, DEWALT laminated two phony employee identification cards; the cards contained photographs of the CI, but the name of Victim-6.

k. After leaving Staples, the CI, UC-1 and DEWALT went to a store in the Bronx, New York. DEWALT entered the store and returned to the car several minutes later with fraudulent W-2s and pay stubs in the name of Victim-6. (The W-2s and pay stubs contained a misspelling of Victim-6's name, which was consistent with the way DEWALT had misspelled the name in his telephone call with HINTON, described in Paragraph 21(b) above).

The same type of W-2s, pay stubs and employee identification cards were recovered from several people previously arrested in connection with this investigation (including the CW) who, following their arrests, admitted that they had obtained identification documents from the Yonkers DMV in other people's identities.

l. Later that same day, at approximately 9:40 a.m., DEWALT called HINTON. After HINTON said, "go ahead," DEWALT spelled out the name of Victim-6 (again, with a misspelling) and provided his/her date of birth. HINTON said, "alright. I'll call you right back."

m. At approximately 10:01 a.m., HINTON called DEWALT and said, "go ahead, it's good." DEWALT replied, "aight,

we working now."

n. The CI, UC-1 and DEWALT then went to the Yonkers DMV Office. Once they arrived, the CI, UC-1 and DEWALT went inside an office entrance of the DMV and met with JONES-WOODSON, who reviewed the paperwork that DEWALT had given the CI. The CI and UC-1 then entered the public entrance to the DMV office and the CI applied for a non-driver's identification card. JONES-WOODSON directed them to the photo counter, where the CI handed in all of the identification documents he had obtained from DEWALT, including the birth certificate, Social Security card, employee identification card, pay stubs and W-2s. JONES-WOODSON was present behind the counter and marked the CI's application with a red marker before returning it to a clerk. Thereafter, the clerk called over JONES-WOODSON, and JONES-WOODSON then called the CI and UC-1 to the counter and explained to them that the name on the birth certificate did not match the name on the other identification documents. JONES-WOODSON told the CI and UC-1 that the documents had to be fixed before they could continue.

o. The CI and UC-1 then returned to the parking lot and told DEWALT what had happened. Then, at approximately 11:38 a.m., DEWALT placed a call to his bank to request that a card be issued in the name of Victim-6, and DEWALT asked that the card be sent by express mail to an address in New York, New York. (That address is the same address used for a number of the fraudulent applications submitted to the Yonkers DMV).

p. Shortly thereafter, at approximately 11:51 a.m., DEWALT received a call from DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendant, who was returning a missed call from DEWALT. DEWALT told ROPER, "I had a snag and I need a card printed up, man." DEWALT and ROPER then discussed when DEWALT wanted the card, and DEWALT said, "I'll take it today, man." ROPER replied, "Then you can get it today."

q. The CI, UC-1 and DEWALT then returned to the store in the Bronx that they had been to earlier that day. DEWALT went inside the store and returned with phony W-2s and pay stubs that contained the correct spelling of Victim-6's name.

r. On or about January 14, 2010, at approximately 9:00 a.m., DEWALT and the CI returned to the Yonkers DMV office. The CI provided his application to JONES-WOODSON, who was behind the counter and reviewed the application. JONES-WOODSON told the CI, however, that the

identification card could not be issued. DEWALT and the CI then met with JONES-WOODSON in the lobby of the DMV office. JONES-WOODSON explained that a license had already been issued in the identity the CI was attempting to use.

s. At approximately 10:31 a.m. that same day, DEWALT called NIEVES MATOS and asked her to call "Alberto" (who I believe to be TORRES-MUNOZ) and tell "Alberto" that DEWALT needed a new identity because a license had already been issued in the other one. DEWALT told her, "the papers that Alberto sold me, after there was nothing in the computer, but something came up from a long time ago, the boy has a license, man. . . . So call Alberto, tell him I need another set of papers. I'm bringing these papers back to him right now."

t. At approximately 12:10 p.m. that same day, DEWALT called the CI, and the CI handed the phone to UC-1. UC-1 asked "what happened." DEWALT explained that he had misspelled the name when he "checked the computer" and that is why the computer did not show a license in that name. (When DEWALT had called HINTON to check the name, he had misspelled the name the same way he did when he initially prepared the employee identification cards, W-2s and pay stubs. When he corrected those with the proper spelling, after the first failed attempt to get a permit, he neglected to ask HINTON to check the computer again using the correct spelling.) DEWALT said he would get a new set of identification documents for the CI. DEWALT said that his "friend" was "gonna call over to Puerto Rico. He gonna get me and expedite me a set of papers. . . . Once I get the papers, it'll just take one or two days for me to finish them." DEWALT told UC-1 that he would let the CI know when everything was ready again.

u. On or about January 19, 2010, the CI made a consensually recorded telephone call to DEWALT. During that call, DEWALT told the CI that "Sarah" would give the CI the new name that the CI would be using for his non-driver's identification card. On or about January 20, 2010, NIEVES MATOS called the CI and provided the new name, which is a real person ("Victim-7").

v. The CI has paid DEWALT a total of \$8,500: \$2,000 on or about October 28, 2009; \$3,000 on or about November 11, 2009; and \$3,500 on or about January 7, 2010. On or about February 17, 2010, the CI went to the Yonkers DMV and obtained an identification card in Victim-7's identity.

DEWALT's Agreement To Assist An Undercover Officer Claiming To Be
A Pakistani Man On The Government's "No-Fly List"

22. On or about January 7, 2010, during the meeting among the CI, UC-1 and WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/ "Mark Fowler," a/k/a "License Man," the defendant (described above in Paragraph 21(j)), UC-1 told DEWALT that he had a friend looking to purchase a driver's license.

23. On or about January 14, 2010, UC-1 spoke to WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/ "Mark Fowler," a/k/a "License Man," the defendant, on the telephone and then introduced DEWALT to another undercover officer ("UC-2") who was posing as a Pakistani friend of UC-1's who wanted to obtain a fraudulent license from DEWALT because he had been placed on the Government's "no-fly list." During the call, DEWALT agreed to help UC-2 obtain an enhanced driver's license for a fee. It is my understanding from representatives of the DMV that an enhanced driver's license can be used to travel via land or sea between the United States and Canada, Mexico or the Carribean. During that call between DEWALT and UC-2:

a. UC-2 told DEWALT, "This is the situation. There was one problem, and I was deported maybe two, three years back. And at that time they took all of my documents, my passport, my license, everything. So they also put me on this goddamn no-fly list. So when I try to get on the airplane, they don't let me get on the goddamn airplane. . . . I'm trying to go back to Pakistan. I'm trying to visit my family. I've not been back in three years, so these people they put me on that goddamn no-fly list, I can't go anywhere."

b. UC-2 told DEWALT that if UC-2 could get an enhanced driver's license, he could get into Canada and then fly to Pakistan from there. DEWALT said, "Well, if I can get you some papers, I can get you the enhanced license and everything, man."

c. During that same call, UC-2 also asked DEWALT if DEWALT could get passports, and DEWALT replied, "We have to take it one step at a time."

d. Later in the same call, UC-2 asked how much of a "deposit" DEWALT needed, and DEWALT replied, "like 1,500, 2,000, to get the papers for you. I just need enough to get the papers."

24. On or about February 15, 2010, UC-2 spoke by telephone with WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant. In this call, UC-2 reminded DEWALT that he was on the no-fly list, and said, "They think I'm some kind of terrorist or something, I don't know." DEWALT responded, "We done talked about that Aki, we know about all that." DEWALT and UC-2 further discussed the downpayment UC-2 would have to make in order to obtain an enhanced driver's license.

Other Customers Surveilled Applying For DMV Documents In Stolen Identities

25. Since ROBIN JONES-WOODSON, the defendant, returned to work at the Yonkers DMV on or about January 4, 2010, agents have intercepted numerous telephone calls over the DEWALT Cellphone concerning customers of WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, for DMV Documents in fraudulent identities, and have conducted surveillance of DEWALT and JONES-WOODSON meeting with numerous of DEWALT's customers at the Yonkers DMV. Agents have identified the transactions that were conducted with these customers and, in many instances, have identified other people using the identities these customers used to obtain DMV Documents.

26. For example, agents have learned the following information about DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," the defendant:¹⁰


a. On or about December 11, 2009, CRAVEN spoke by telephone with WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, and told DEWALT that he had sent DEWALT a \$900 money transfer in the name "Shernette Rowe." On or about January 10, 2010, CRAVEN again spoke by telephone with DEWALT. In this call, CRAVEN told DEWALT, "he is in Boston," and said, "Tell me what day is good for you." DEWALT responded, "I don't see why we don't do it tomorrow." The following day, on or about January

¹⁰ Other agents and I observed CRAVEN apply for a learner's permit under the name "David Ray Craven" at the Yonkers DMV office. I subsequently reviewed a photograph on file with the DMV under the name "David Ray Craven," and have determined that it depicts the person I have observed on surveillance and have identified as CRAVEN. The cellphone CRAVEN uses to speak to DEWALT is subscribed in the name "Julius Simons."

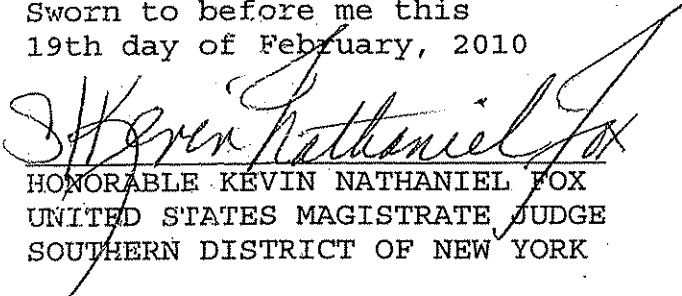
11, 2010, other agents and I observed CRAVEN, a man, and a woman meet with DEWALT and ROBIN JONES-WOODSON, the defendant, at the Yonkers DMV office. CRAVEN, the man, and the woman were riding in a car with a Massachusetts license plate registered to "Shernette Rowe." The man applied for a learner's permit that day in the name "James Jeffries."

b. On or about December 31, 2009, CRAVEN spoke by telephone with DEWALT. In this call, DEWALT said, "I just got the scoop on your girl . . . one-hundred percent on Tuesday, man." On or about January 5, 2010, the following Tuesday, other agents and I observed CRAVEN arrive at the Yonkers DMV office with a woman, and meet with DEWALT and JONES-WOODSON. The woman then applied for a non-driver's identification card in the name "Lashunda Harris." GLENDA HINTON, the defendant, had previously researched that name in a non-public DMV database on or about December 9, 2009.

WHEREFORE, deponent prays that arrest warrants be issued for WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," OLGA NIEVES MATOS, a/k/a "Sarah," DAVID RAY CRAVEN, a/k/a "Max," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and that they thereafter be imprisoned or bailed, as the case may be.


MARK COZINE
Senior Special Agent
Immigration and Customs Enforcement

Sworn to before me this
19th day of February, 2010


HONORABLE KEVIN NATHANIEL FOX
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK