

Mod AO 442 (09/13) Arrest Warrant AUSA Name & Telno: Samuel P. Rothschild, Tel: 212-637-2504

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America
v.
JERISON ROJAS VILLALOBOS,
a/k/a "Jerinson Rojas,"
a/k/a "Jericson Rojas"

Case No. 19 MAG 11733

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas",
who is accused of an offense or violation based on the following document filed with the court:

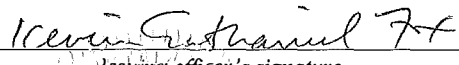
- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Violations of 18 U.S.C. §§ 1349 & 1956

Date: 12/16/2019

City and state: New York, NY


Issuing officer's signature
Hon. Kevin Nathaniel Fox, USMJ
Printed name and title

Return	
This warrant was received on (date) _____, and the person was arrested on (date) _____ at (city and state) _____.	
Date: _____	Arresting officer's signature _____ Printed name and title _____

Mod AO 442 (09/13) Arrest Warrant AUSA Name & Telno: Samuel P. Rothschild, Tel: 212-637-2504

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America
v.
MARIA FERNANDA GUTIERREZ OSPINO

Case No. **19 MAG 11733**

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) MARIA FERNANDA GUTIERREZ OSPINO,
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Violations of 18 U.S.C. §§ 1349 & 1956

Date: 12/16/2019

Kevin Nathaniel Fox
Issuing officer's signature

City and state: New York, NY

Hon. Kevin Nathaniel Fox, USMJ
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: ____

Arresting officer's signature

Printed name and title

Dec 17, 2019

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - Miami

19 MAG 11 7 33

Approved: Samuel P. Rothschild
 SAMUEL P. ROTHSCHILD
 Assistant United States Attorney

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

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 :
 UNITED STATES OF AMERICA : SEALED COMPLAINT
 :
 - v. - : Violations of
 : 18 U.S.C. §§ 1349 and 1956
 JERISON ROJAS VILLALOBOS, :
 a/k/a "Jerinson Rojas," : COUNTY OF OFFENSE:
 a/k/a "Jericson Rojas," : NEW YORK
 JOSE ANDRE URENA SANCHO, :
 MARIA FERNANDA GUTIERREZ OSPINO, :
 :
 Defendants. :
 ----- x

SOUTHERN DISTRICT OF NEW YORK, ss.:

TROY A. PITTENGER, being duly sworn, deposes and says that he is a U.S. Postal Inspector with the U.S. Postal Inspection Service and charges as follows:

COUNT ONE

(Conspiracy to Commit Mail Fraud, Wire Fraud, and Bank Fraud)

1. From at least in or about 2016 up to and including at least in or about 2019, in the Southern District of New York and elsewhere, JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," JOSE ANDRE URENA SANCHO, and MARIA FERNANDA GUTIERREZ OSPINO, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit mail fraud, in violation of Title 18, United States Code, Section 1341, wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and object of the conspiracy that JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," JOSE ANDRE URENA SANCHO, and MARIA FERNANDA

GUTIERREZ OSPINO, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and would and did take and receive therefrom, such matters and things, and would and did knowingly cause to be delivered by mail and such carriers according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, in violation of Title 18, United States Code, Section 1341.

3. It was further a part and object of the conspiracy that JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," JOSE ANDRE URENA SANCHO, and MARIA FERNANDA GUTIERREZ OSPINO, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

4. It was further a part and object of the conspiracy that JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," JOSE ANDRE URENA SANCHO, and MARIA FERNANDA GUTIERREZ OSPINO, the defendants, and others known and unknown, willfully and knowingly, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Conspiracy to Commit Money Laundering)

5. From at least in or about 2017 up to and including at least in or about 2019, in the Southern District of New York and elsewhere, JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," JOSE ANDRE URENA SANCHO, and MARIA FERNANDA GUTIERREZ OSPINO, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

6. It was a part and object of the conspiracy that JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," JOSE ANDRE URENA SANCHO, and MARIA FERNANDA GUTIERREZ OSPINO, the defendants, and others known and unknown, in an offense involving interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, check transactions and wire transfers, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, the conspiracy to commit mail fraud, wire fraud, and bank fraud alleged in Count One of this Complaint, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

7. The bases for my knowledge and the foregoing charge are, in part, as follows: I have been a U.S. Postal Inspector with the U.S. Postal Inspection Service for approximately two years. Prior to that, I served in the Federal Air Marshal Service for approximately six years. I have been personally involved in the investigation of this matter. This Affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this Affidavit is being submitted for the limited purpose of demonstrating 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.

8. Since in or about 2018, I have been investigating a scheme designed to fraudulently obtain money from elderly victims in the Southern District of New York and elsewhere. In many cases, the elderly victim was falsely informed, among other things, that s/he had won a sweepstakes lottery but that, to claim the prize, s/he first needed to pay fees and/or taxes by mailing checks or wiring money to particular places or people. In some cases, the elderly victim was falsely informed that a family member or friend had been kidnapped and that s/he needed to pay a ransom. From at least in or about 2016 up to and including at least in or about 2019, at least 116 victims sent JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," JOSE ANDRE URENA SANCHO, and MARIA FERNANDA GUTIERREZ OSPINO, the defendants, and their other co-conspirators at least \$3,207,116.74 through mailed checks, wire transfers, or other means.

9. Based on reviewing materials provided by a bank ("Bank-1"), I have learned the following:

a. On or about July 26, 2017, JOSE ANDRE URENA SANCHO ("URENA"), the defendant, opened a checking account at Bank-1 ("Account-1") on behalf of JSR Services USA Corp. ("JSR Services").

b. URENA incorporated JSR Services in Florida in or about July 2017. Based on reviewing materials provided by the Florida Department of Revenue, I have learned that JSR Services does not appear to have ever registered or filed with the Florida Department of Revenue.

c. On or about February 12, 2018, an individual ("Complainant-1") informed Bank-1 that Complainant-1 received at least two phone calls from individuals purporting to work for JSR Services who told Complainant-1 that s/he had won a lottery prize but that, to access the prize money, s/he needed to wire funds to JSR Services' account at Bank-1.

d. In response to the information from Complainant-1, on or about February 23, 2018, Bank-1 emailed URENA asking about the sources of certain deposits and the nature of JSR Services' business relationships with those sources.

10. Based on reviewing records from an email provider obtained pursuant to a judicially authorized search warrant, I have learned the following:

a. On or about February 23, 2018, the day Bank-1 emailed JOSE ANDRE URENA SANCHO, the defendant, he forwarded that email to JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas" ("ROJAS"), the defendant.

b. Two days later, on or about February 25, 2018, MARIA FERNANDA GUTIERREZ OSPINO ("GUTIERREZ"), the defendant, emailed ROJAS and URENA. The subject of her email was "Facturas," and her email attached a nine-page PDF called "Facturas JSR Services-USA Corp." Based on my training and experience, I know that "facturas" means "invoices" in Spanish. Pages 1-5 of the PDF contained copies of invoices for JSR Services' purported clients. Pages 6-9 were largely blank.

c. The next day, on or about February 26, 2018, ROJAS sent URENA an email with a one-word subject. The word in the subject was the first word in Bank-1's name. The body of email said:

"perfume price is a perfumery wholesale company we have a long time working with them, we work with clients from other clients, we have been in the perfumes business for 2 years or we have the best prices in the market for the purchase volume[.] please if you help me with the letters to the banks because my employees are having problems with their accounts because of the inconvenience[.]"

d. The same day, on or about February 26, 2018, URENA responded to the inquiries from Bank-1's February 23, 2018 email to URENA. URENA's email to Bank-1 included several phrases that appear to have been copied directly or loosely from ROJAS's February 26, 2018 email to URENA:

"J[SR] Services . . . is a company dedicated to buy big volumes, of perfumes and our mission and job is the distribution of this in smaller way between all network of customers and clients, we have made through the time. . . . We work with clients from other clients Perfume Price . . . is a perfumery whole sale company that we have been working with, for a long time . . . we have been in the perfumes business

for 2 years and thanks to Perfume Price we have the best prices in the market for the purchase volume. . . . please take care of me with the letters to the banks because my employees are having problems with their accounts due of this inconvenience."

URENA attached to that email to Bank-1 the "Facturas JSR Services USA Corp." PDF that URENA had received from GUTIERREZ. The "Facturas JSR Services USA Corp." PDF invoices purported to reflect sales of perfume by referring to, for example, "perf" or "per."

e. On or about February 28, 2018, Bank-1 emailed URENA asking, among other things, what was purchased by specific check remitters, including a particular individual ("Victim-1").

f. On or about March 5, 2018, GUTIERREZ emailed URENA. The subject was "Facturas," and the email attached a nine-page PDF called "Book1." Pages 1-5 of the "Book1" PDF are the same as pages 1-5 of the "Facturas JSR Services USA Corp." PDF. Whereas pages 6-9 of the "Facturas JSR Services USA Corp." PDF were largely blank, pages 6-8 of the "Book1" PDF included more invoices, and page 9 was blank. The invoices from the "Book1" PDF collectively purport to show that, in or about February 2018, Victim-1, a client from California, purchased from JSR Services over \$20,000 of perfume.

g. On or about March 6, 2018, URENA emailed Bank-1 the "Book1" PDF he had received the previous day from GUTIERREZ.

11. Based on reviewing materials provided by Bank-1, I have learned the following:

a. In or about February 2018, checks on behalf of Victim-1 or a trust in Victim-1's name totaling over \$20,000 and made out to JSR Services were deposited into Account-1.

b. In or about February 2018, a check on behalf of another individual ("Victim-2") in the amount of approximately \$1,800 and made out to JSR Services was deposited into Account-1.

c. In or about February 2018, approximately \$3,300 in payments were made from Account-1 to JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," the

defendant; approximately \$10,400 in payments were made from Account-1 to JRV Enterprises LLC ("JRV Enterprises"); and approximately \$31,750 in payments were made from Account-1 to Perfume Price Miami, Inc. ("Perfume Price").

d. As part of Bank-1's investigation prompted by Complainant-1's complaint, Bank-1 contacted the credit union that had issued some of the checks on behalf of Victim-1 ("Credit Union-1"). Credit Union-1 confirmed that Victim-1's account included a notation for possible elder exploitation based on fraudulent sweepstakes calls. Credit Union-1 provided Bank-1 a hold harmless indemnification agreement to recover any funds available for Victim-1.

e. In or about March 2018, Bank-1 closed Account-1 and distributed the available funds for the benefit of the identified victims of fraud. For instance, Bank-1 issued approximately \$18,383.37 to Credit Union-1 for the benefit of Victim-1.

12. Based on speaking to and reviewing materials provided by Victim-1, I have learned the following:

a. Victim-1 is a senior citizen who resides in California.

b. At some point before my contact with Victim-1 on or about April 9, 2019, Victim-1 received a phone call from an individual who told Victim-1 that she won a prize but that, to claim the prize, she first needed to mail a check made out to JSR Services at a particular address in Florida ("Address-1").

c. Between on or about February 2, 2018 and February 13, 2018, Victim-1 instructed financial institutions to issue official checks—from either her account or an account for a trust in her name—to JSR Services totaling approximately \$28,495.65. At least one of those checks was mailed to Address-1.

d. Victim-1 never received any prize in return for her payments.

e. Victim-1 never purchased or received any perfume from JSR Services.

13. Based on speaking to and reviewing materials provided by Victim-2, I have learned the following:

a. Victim-2 is senior citizen who resides in Westchester County, NY.

b. At some point before my contact with Victim-2 on or about July 11, 2019, Victim-2 received a phone call from an individual who told him that he won a prize but that, to claim the prize, he first needed to mail checks made out to JSR Services and to JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," the defendant.

c. On or about February 6, 2018, Victim-2 transmitted a check for approximately \$1,800 to JSR Services.

d. On or about February 21, 2018, Victim-2 transmitted a check for approximately \$3,800 to ROJAS.

e. Victim-2 never received any prize in return for his payments.

14. Based on reviewing materials provided by a bank ("Bank-2"), I have learned the following:

a. On or about August 3, 2017, JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," the defendant, opened a personal checking account at Bank-2 ("Account-2").

b. On or about November 27, 2017, ROJAS opened a checking account at Bank-2 ("Account-3") on behalf of JRV Enterprises.

c. ROJAS incorporated JRV Enterprises in Florida on or about August 16, 2017. Based on reviewing materials provided by the Florida Department of Revenue, I have learned that JRV Enterprises was registered for Sales and Use Tax on or about July 1, 2018 and was canceled for Sales and Use Tax on or about December 15, 2018, and no returns were ever filed with the Florida Department of Revenue.

d. On or about March 1, 2018, a check on behalf of Victim-2 for approximately \$3,800 and made out to ROJAS was deposited into Account-2.

e. Between in or about January 10, 2018 and July 1, 2019, approximately \$608,303.59 in payments were made from Account-3 to Perfume Price.

15. Based on reviewing materials returned from open source searches of Florida business records, I have learned the following:

a. On or about April 30, 2018, MARIA FERNANDA GUTIERREZ OSPINO, the defendant, signed a corporate document on behalf of Magic Fantasy Corp. ("Magic Fantasy"). A May 15, 2017 document from Magic Fantasy indicated that JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," the defendant, was formerly the president of Magic Fantasy, and that JOSE ANDRE URENA SANCHO, the defendant, was the vice president of Magic Fantasy.

b. On or about March 3, 2017, GUTIERREZ, the defendant, signed a corporate document on behalf of MFGO Inc. ("MFGO").

16. Based on speaking to and reviewing materials provided by an individual ("Victim-3"), I have learned the following:

a. Victim-3 is a senior citizen who resides in New York, NY.

b. At some point before my contact with Victim-3 on or about March 7, 2019, Victim-3 was informed through phone calls and mailed materials that she won a prize but that, to claim the prize, she first needed to send money to MFGO at Address-1 and to JSR Services.

c. Between on or about June 27, 2018 and August 30, 2018, Victim-3 transmitted to MFGO approximately \$122,635 via cashier's and personal checks.

d. On or about September 6, 2018, Victim-3 transmitted a cashier's check for approximately \$10,000 made out to JSR Services.

e. Victim-3 never received any prize in return for her payments.

17. Based on reviewing materials provided by banks and speaking to and reviewing materials provided by victims, I have learned the following:

a. Between in or about February 2018 and December 2018, at least five victims sent money by cashier's check or wire to JSR Services. At least some of those wire

transfers moved interstate from a financial institution in Oregon to a financial institution based in Arkansas whose client is based in Florida.

b. In or about June 2018, at least one victim sent money by check to JRV Enterprises.


c. Between in or about June 2018 and November 2018, at least two victims sent money by check or money order to JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," the defendant.

d. Between in or about July 2017 and February 2019, at least seven victims sent money by cashier's check, money order, check, or wire to Magic Fantasy or MFGO.

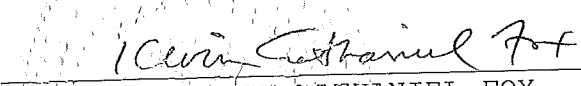
e. None of the victims received anything in return for their payment.

18. Based on reviewing statements JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," the defendant, made to other law enforcement agents, I have learned that ROJAS told law enforcement agents that he exports perfume to Costa Rica on a weekly basis from a location in Florida.

WHEREFORE, deponent requests that warrants be issued for the arrests of JERISON ROJAS VILLALOBOS, a/k/a "Jerinson Rojas," a/k/a "Jericson Rojas," JOSE ANDRE URENA SANCHO, and MARIA FERNANDA GUTIERREZ OSPINO, the defendants, and that they be arrested and imprisoned, or bailed, as the case may be.


Troy A. Pittenger
U.S. Postal Inspector
U.S. Postal Inspection Service

Sworn to before me this
16th day of December, 2019


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