

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	1:24-cr-10138-LTS-MPK
)	
OSCAR MANUEL CASTANOS GARCIA,)	
<i>et al.</i> ,)	
)	
Defendants)	

GOVERNMENT’S MOTION FOR DETENTION

The United States respectfully moves for the detention of the defendants in the above-captioned case pending trial under 18 U.S.C. § 3142(f)(2)(A), based on the serious risk that the defendants will flee.

The United States submits the attached Affidavit of Special Agent Terrence Dupont in support of this motion. Based on the facts set forth in the Affidavit and the factors set forth in 18 U.S.C. § 3142(g), there are no conditions of release that will reasonably assure the defendants’ appearances in this matter. Specifically, and as detailed in the Affidavit:

- The nature and circumstances of the charged offenses are serious. 18 U.S.C. § 3142(g)(1). Defendants are charged with carrying out a transnational scheme to perpetrate “grandparent scams” against elderly victims in the United States from “call centers” in the Dominican Republic and to transmit scam proceeds from the United States to the Dominican Republic. Investigators have identified over 400 victims—including at least 50 in Massachusetts—with an average age of 84, and more than \$5 million in losses attributable to these offenses.

- The weight of the evidence against the defendants is overwhelming. 18 U.S.C. § 3142(g)(2). Investigators obtained the contents of extensive electronic communications between the co-defendants through court-authorized search warrants of iCloud accounts and mobile phones. These messages illustrate the scheme in action and the defendants' roles. Police reports, rideshare company records, and bank records corroborate these messages.
- Defendants' histories and characteristics caution that release conditions will not reasonably assure their appearances. 18 U.S.C. § 3142(g)(3). The defendants all are citizens of the Dominican Republic. Six of the defendants live in the Dominican Republic full-time; two of these defendants returned to the Dominican Republic to flee from prosecution in the United States. Of the five defendants who live in the United States, only two do so with legal authorization. (Two remaining defendants already are detained in connection with this case after traveling to the United States last year.) Most of the defendants appear to have no immediate family in the United States. The defendants enjoyed ready access to cash and used false identification documents in connection with the offenses. Moreover, several of the defendants continued to participate in the fraud scheme even after facing state charges related to specific victims.

In short, the defendants are charged with harmful and reprehensible conduct; the evidence against them vividly illustrates this conduct; and the defendants have strong ties to the Dominican Republic and only weak (if any) lawful ties to the United States. They have strong incentives to avoid prosecution and access to resources with which to flee. Because no conditions can reasonably

assure their appearances in this case, the government respectfully moves for the defendants' detention pending trial.

Respectfully Submitted,

LEAH B. FOLEY
United States Attorney

By: /s/ David M. Holcomb
David M. Holcomb
Assistant U.S. Attorney

Dated: August 12, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ David M. Holcomb
DAVID M. HOLCOMB
Assistant U.S. Attorney

AFFIDAVIT

I, Terrence Dupont, being duly sworn, state:

I. Introduction

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since 2012. I am currently assigned to the Economic Crimes squad with the FBI’s Boston Division. Before this assignment, I spent approximately six and a half years on FBI Public Corruption and Health Care Fraud squads. I have participated in investigations of various federal crimes, including mail and wire fraud, money laundering, honest services fraud, and aggravated identity theft, among others. These investigations have used various investigative techniques, including but not limited to, search warrants, Title III wiretaps, and consensual recordings. These investigations have led to the arrest, prosecution, and conviction of numerous individuals.

2. I submit this affidavit in support of the government’s motion that the defendants in *United States v. Oscar Manuel Castanos Garcia et al.*, Case No. 24-cr-10138-LTS, be detained pending trial.

3. The defendants have been charged in an indictment in the District of Massachusetts with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1949, and/or money laundering conspiracy, in violation of 18 U.S.C. § 1956(h). The defendants are alleged to have carried out a transnational scheme (i) to perpetrate “grandparent scams” against elderly victims in the United States from multiple “call centers” in the Dominican Republic, (ii) to use “runners” and unwitting rideshare drivers to obtain cash from those victims, and (iii) to transmit proceeds from the scams to the Dominican Republic through cash handoffs and bank transfers disguised as business transactions.

4. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other law enforcement

authorities and witnesses. This affidavit is intended to present facts relevant to the government's motion for detention and does not set forth all of my knowledge about this matter.

II. Background of Investigation

5. This case involves an investigation by the Boston Division of the FBI. The investigation focused on grandparent scams perpetrated by a Dominican Republic-based call center operation led by defendant OSCAR MANUEL CASTANOS GARCIA ("CASTANOS GARCIA").

6. A "call center," in this context, is criminal organization whose employees, located overseas, make fraudulent calls to victims in the United States.

7. In a grandparent scam, perpetrators trick elderly victims into giving away tens of thousands of dollars by pretending to be a victim's grandchild or someone assisting the grandchild. The perpetrator contacts the victim over the phone and impersonates the victim's grandchild, other relative, or close friend. The caller then convinces the victim that the grandchild or other loved one is in some sort of legal or medical trouble and needs cash quickly to rectify the situation. In many instances, the scam involves multiple callers, such as a caller impersonating a lawyer for the grandchild or loved one. Perpetrators of these scams often direct elderly victims to ship cash or hand over cash to a courier. In some instances, perpetrators arrange for elderly victims to be driven to the bank to withdraw cash.

8. Investigators learned about CASTANOS GARCIA's call center operation through reports of grandparent scams from local police departments, information from rideshare companies, and information provided by law enforcement personnel in the Dominican Republic.

9. The investigation revealed that CASTANOS GARCIA operated multiple call centers in the Dominican Republic with the assistance of several managers, including defendants JOEL JOSE CRUZ RODRIGUEZ, a/k/a "Paflow" ("CRUZ RODRIGUEZ"), EDWARD JOSE

PUELLO GARCIA (“PUELLO GARCIA”), and JOAN MANUEL MATHILDA LEON (“JOAN MATHILDA LEON”). These defendants employed and supervised callers who placed the scam phone calls to elderly victims.

10. CASTANOS GARCIA used “runners” to pick up cash obtained from elderly victims in the United States. JOAN MATHILDA LEON and defendant RANSEL STARLIN TAVAREZ JIMENEZ (“TAVAREZ JIMENEZ”) recruited runners for the operation and dispatched the runners to locations targeted by the call centers. Runners for the operation included (in addition to JOAN MATHILDA LEON and TAVAREZ JIMENEZ) defendants JOEL FRANCISCO MATHILDA LEON (“JOEL MATHILDA LEON”), ANDRY JOEL BAEZ SANTANA (“BAEZ SANTANA”), JOSE OSVALDO POLANCO BATISTA, a/k/a “Obbi” (“POLANCO BATISTA”), CHAMAN SAMAEL SILVERIO BALBUENA, a/k/a “Chammy” (“SILVERIO BALBUENA”), MANUEL NICOLAS RIVERA CUETO (“RIVERA CUETO”), and JOSE ARONY FERMIN VASQUEZ, a/k/a “Chiky” (“FERMIN VASQUEZ”). Another call center operator, defendant LUIS GERMAN SANTOS BURGOS, a/k/a “Mambo Flow” (“SANTOS BURGOS”), at times partnered with CASTANOS GARCIA to carry out grandparent scams and retrieve scam proceeds from the United States.

11. CASTANOS GARCIA received assistance from a money transmitter in the Dominican Republic, defendant GERARDO HERIBERTO NUÑEZ NUÑEZ (“NUÑEZ NUÑEZ”), to retrieve proceeds from the United States. For a fee, NUÑEZ NUÑEZ provided CASTANOS GARCIA with bank accounts in the names of purported businesses, into which runners could deposit cash in the United States. NUÑEZ NUÑEZ then provided CASTANOS GARCIA with cash in the Dominican Republic. NUÑEZ NUÑEZ also arranged for a nephew living in New York City to receive cash drop-offs from CASTANOS GARCIA’s runners.

12. Investigators reviewed the contents of extensive electronic communications between co-conspirators obtained through court-authorized search warrants of iCloud accounts and mobile phones. Based on these messages, as well as police reports, rideshare company records, and bank records, investigators have identified over 400 victims—including at least 50 in Massachusetts—with an average age of 84, and more than \$5 million in losses attributable to CASTANOS GARCIA and co-conspirators.

III. Evidence of the Offenses

Operating the Call Centers

13. Messages between CASTANOS GARCIA and co-conspirators demonstrate that CASTANOS GARCIA maintained multiple call center facilities in Santiago de los Caballeros and Puerto Plata, in the Dominican Republic. These call centers existed for the sole purpose of carrying out grandparent scams against victims in the United States.

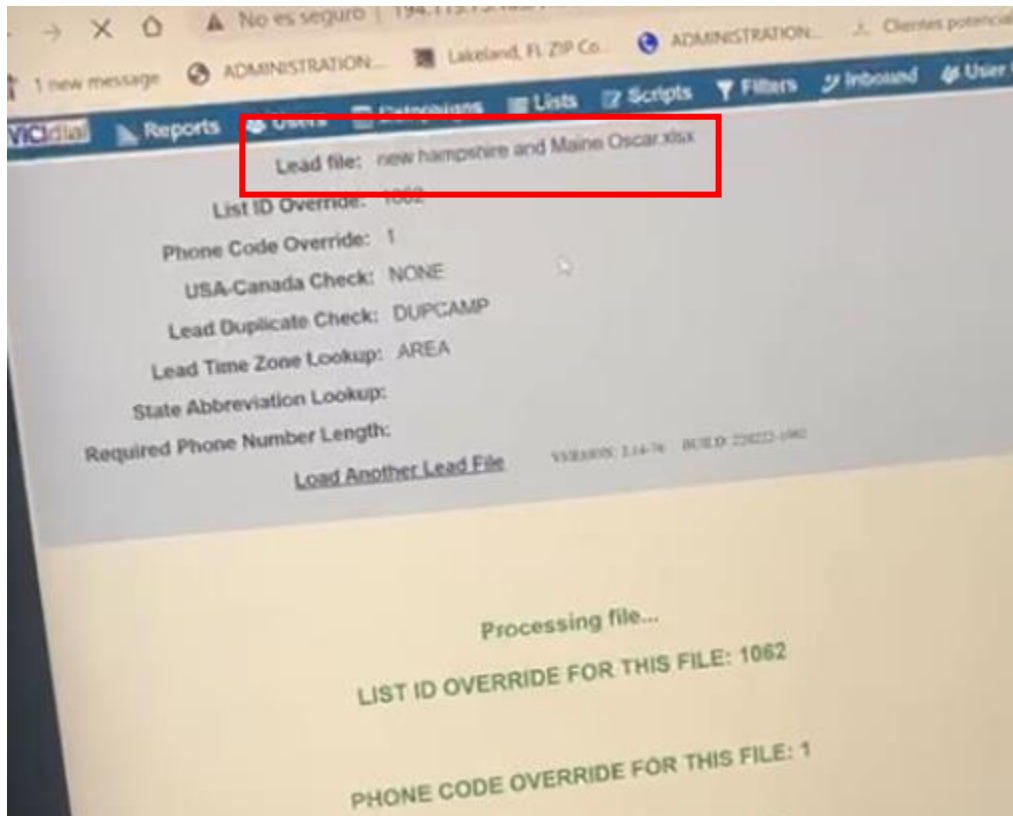
14. The call centers typically operated out of residential homes, including the one depicted below with JOAN MANUEL MATHILDA:



15. CASTANOS GARCIA, CRUZ RODRIGUEZ, PUELLO GARCIA, JOAN MATHILDA LEON, and other outfitted these facilities with stations for call center employees and equipped these stations with phone and computer technology for the employees to use to call elderly victims in the United States:



16. The call center operators used commercial telemarketing software to organize lists of elderly victims and track callers' activity. They purchased lists of information about elderly victims from other individuals in the Dominican Republic who obtained such lists from the dark web. Operators organized these lists by geographic regions and directed callers to target victims on those lists. For example, the following still image is from a video that CASTANOS GARCIA sent to call center employees, showing him uploading a spreadsheet titled "new hampshire and Maine Oscar" into the telemarketing program. CASTANOS GARCIA then messaged the employees, "Carne fresca" ("fresh meat").



17. The call centers used Voice over Internet Protocol (“VoIP”) technology to place calls over the internet and to make calls appear like they originated from phone numbers in the United States.

18. The call center operators divided employees into “openers,” who impersonated grandchildren in trouble, and “closers,” who impersonated attorneys for the grandchildren and directed the victims to send or deliver cash to aid the grandchildren.

19. Call center managers provided employees with scripts to use when calling victims. The following photos illustrate a script that “openers” in CASTANOS GARCIA’s call centers typically followed:

IT'S YOUR MONEY... MAKE EVERY CALL COUNT...

Hello, Grandma/pa...

It's me your grandson...(pause, wait for answer)... Your oldest grandson...

I am In (STATE)... I came over beause a friend passed away...so, I came to pay my respects to the family...

After the funeral, we all went to a restaurant, we had dinner, and we did a farewell toast for my friend and I had two glasses of wine... then leaving the restaurant... This lady (Out of nowhere), ran the red light and I ran into her... And when the Police came, they gave me a breathalyzer test and said that I was over the limit....

I was granted a 5 minute phone call, and I called you, because i now you can help me...

Please, promise that you will keep this between us until i get out, I am ashamed about this... Ok

I was arrested and now I am in jall... I was assigned a public defender, his name is Mark Steven...

He says that I can get out today, if I post bail, but I cannot post my own bond... I have money in my account, but I cannot get to it, Please....

need help with my bail, I promise that I will make it up to you, when I get out.

I love you...

IT'S YOUR MONEY...MAKE EVERY CALL
COUNT...\$

Hello, Grandma/pa...

It's me your grandson...(pause, wait for
answer) ... Your oldest grandson...

I am in (STATE)... I came over because a friend
passed away...so, I came to pay my respects to
the family...

After the funeral, we all went to a restaurant,
we had dinner, and we did a farewell toast for
my friend and I had two glasses of wine...then
leaving the restaurant... This lady (Out of
nowhere), ran the red light and I ran into her...
And when the Police came, they gave me a
breathalyzer test and said that I was over the
limit...

I was granted a 5 minute phone call, and I
called you, because I know you can help me...

Please, promise that you will keep this
between us until I get out, I am ashamed about
this...OK

I was arrested and now I am in jail... I was
assigned a public defender, his name
is....., and his number is.....

He says that I can get out today, if I post bail,
but I cannot post my own bond....I have money
in my account, but I cannot get to it, Please...I
need help with my bail, I promise that I will
make it up to you, when I get out.

I love you...

20. Call center employees kept track of the amounts of money obtained through successful scams each day. For example, they maintained a running scoreboard at the call center identifying the openers and closers responsible for scam earnings, as seen below:

OPENER	CLOSER	AMOUNT	COMPAN
KUKY	Ne\$\$	9,500	LIVE
Pete	Ne\$\$	5,000	LIVE
JAZMIN	MARIO	9,500	LIVE
JAZMIN	MARIO	4,000	LIVE
TEXAS	Ne\$\$	7,500	LIVE
TEXAS	Ne\$\$	8,840	LIVE
RASHIDA	Choco	4,250	LIVE
KUKY	Jowell	13,500	LIVE
KUKY	Jowell	15,000	LIVE
Rashida	Choco	3,200	LIVE

21. CASTANOS GARCIA, CRUZ RODRIGUEZ, PUELLO GARCIA, JOAN MATHILDA LEON, and others paid the call center employees a percentage of their successful scams:

064 9200 Peter 1449 0.30 1736 x53 6440 x53 74,000 5794 92,000 <u>Lunes</u>	Jordan 9800 Peter 1543 0.30 1852 x53 6860 x53 82,000 6174 98,000 <u>Martes</u>	Jazmin 8500 Choco 1338 0.30 1406 x53 5950 x53 71,000 5355 85,000 <u>Martes</u>	Ronny 7500 Mario 1181 0.30 1417 x53 5250 x53 62,000 4725 75,000 <u>Lunes</u>
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Obtaining Scam Proceeds

22. Messages between the co-conspirators demonstrate how the call center operators relied on runners in the United States to secure scam proceeds from elderly victims.

23. CASTANOS GARCIA, CRUZ RODRIGUEZ, JOAN MATHILDA LEON, and others would dispatch runners to the geographic areas targeted by the call centers, including Massachusetts.

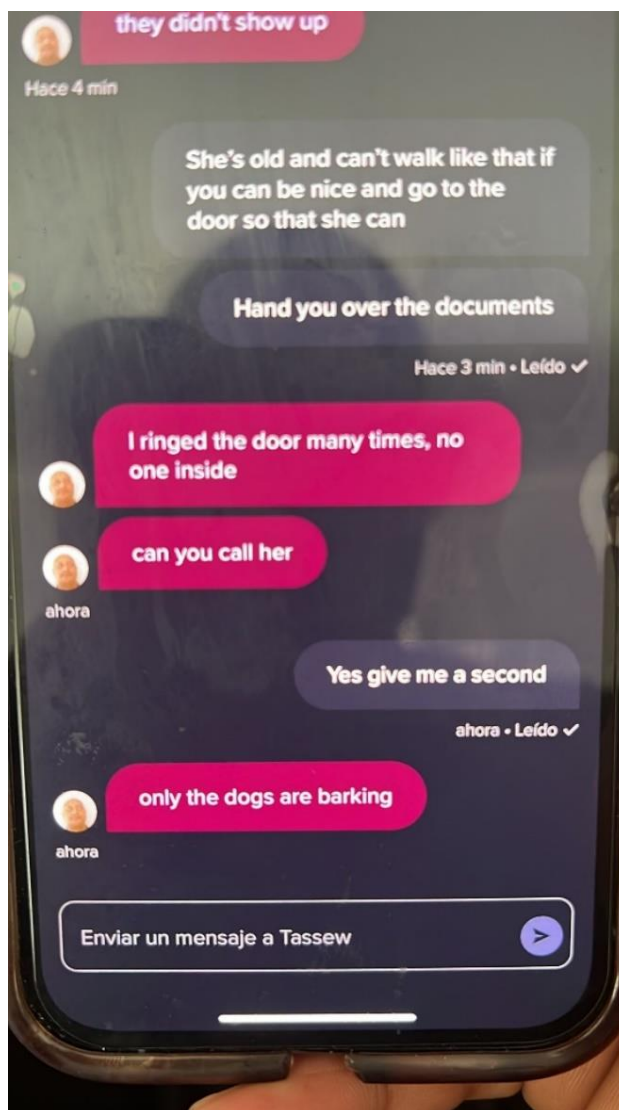
24. At times, call center employees directed victims to ship cash to addresses in proximity to the runners. For example (and as alleged in the indictment), in September 2022, call center employees instructed a Texas-based victim to send cash via UPS to two addresses in Attleboro, Massachusetts. TAVAREZ JIMENEZ picked up the package that UPS delivered to the first address. WHEN TAVAREZ JIMENEZ attempted to collect the package at the second address, Attleboro police arrested him. At CASTANOS GARCIA's request, SANTOS BURGOS then sent two of his relatives to pick up the package at the second address.

25. Most commonly, runners for CASTANOS GARCIA's operation used rideshare company drivers to pick up cash from victims and drop the cash off at the runners' locations.

26. Messages demonstrate that, once a caller convinced a victim to send cash, a call center operator would instruct a runner in the victim's area to send a rideshare driver to the victim's address. The runner would use a rideshare account (in his own name or in the name of a girlfriend or friend) to request that a rideshare driver pick up "documents" from a grandparent. For example (and as alleged in the indictment), in February 2023, BAEZ SANTANA and SILVERIO BALBUENA directed a Lyft driver to the address of an elderly victim in Agawam, Massachusetts, and BAEZ SANTANA messaged the driver: "Hello, my grandmother will send some documents, can you bring them to me, please? I'm going to tip you, university documents."

27. The runner would then direct the rideshare driver to deliver the package of “documents” to the runner’s location.

28. The runners exchanged messages with unwitting rideshare drivers for the purpose of completing the cash pickups. For example, POLANCO BATISTA exchanged the following messages with a rideshare driver after the elderly victim did not immediately come to the door upon the driver’s arrival:



29. CASTANOS GARCIA, TAVAREZ JIMENEZ, and others directed the runners to count cash from victims on video, such as in the following still image:



30. CASTANOS GARCIA paid the runners a portion of the scam proceeds they picked up (typically around 15%).

Transmitting Proceeds to the Dominican Republic

31. Messages also demonstrate how the call center operators used the runners and money transmitters, including NUÑEZ NUÑEZ, to channel the scam proceeds from the United States to the Dominican Republic.

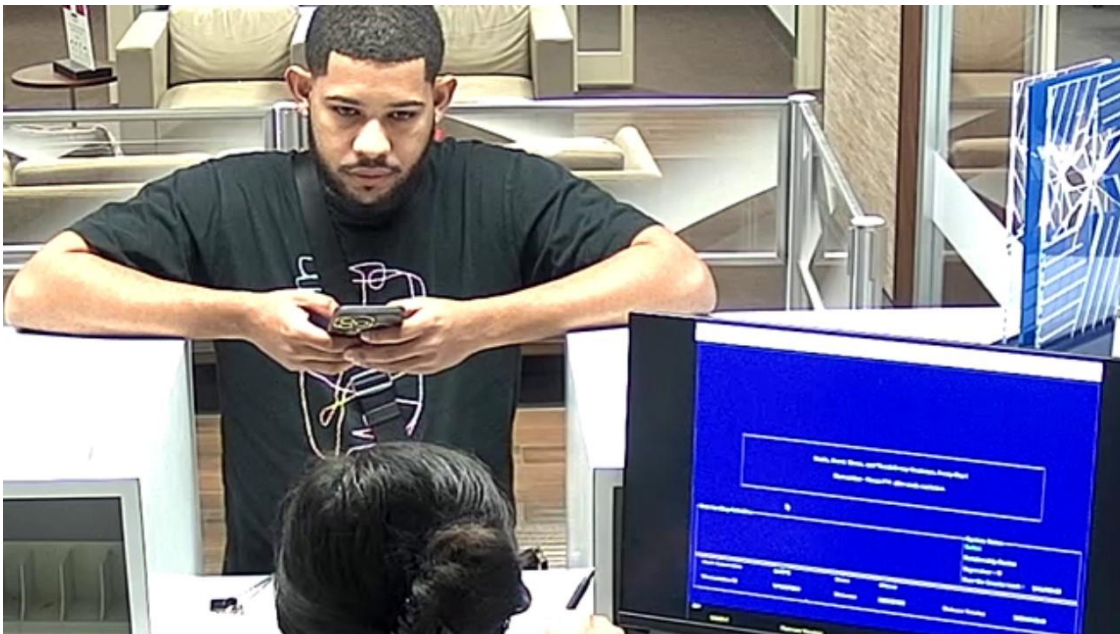
32. At CASTANOS GARCIA's request, NUÑEZ NUÑEZ provided information for various business bank accounts in the United States, into which the runners could deposit scam proceeds.

33. For example, NUÑEZ NUÑEZ provided CASTANOS GARCIA information for a Bank of America account in the name of a purported wholesale distributor of vape electronic cigarette supplies. CASTANOS GARCIA relayed this bank account information to runners, and the runners sent CASTANOS GARCIA photographs of deposit slips demonstrating that, in total,

the runners deposited at least \$674,982 in cash from grandparent scams into this particular bank account between 2022 and May 2023.

34. In messages, NUÑEZ NUÑEZ instructed CASTANOS GARCIA to have runners make deposits in amounts below \$10,000. Based on my training and experience, I believe that NUÑEZ NUÑEZ gave this instruction to avoid detection by banks, which are required to file reports about cash transactions of \$10,000 or more. Bank records show that runners made nearly all cash deposits into bank accounts provided by NUÑEZ NUÑEZ in amounts “structured” to avoid the \$10,000 reporting threshold (typically, between \$7,000 and \$9,500).

35. At other times, CASTANOS GARCIA instructed the runners to deposit scam proceeds into bank accounts supplied by SANTOS BURGOS. Bank surveillance images show runners for CASTANOS GARCIA, including POLANCO BATISTA and RIVERA CUETO (pictured below), making cash deposits into accounts controlled by SANTOS BURGOS:



Date: 01/05/2023 16:42:32.02
Camera: LT 3 IP
Event: Surveillance
DVR: CHASEWOOD-PLAZA-109019



Date: 02/27/2023 16:39:46.61
Camera: LT 3 IP
Event: Surveillance
DVR: Livermore-126763

36. Messages also show that NUÑEZ NUÑEZ coordinated with his nephew, a Dominican national living in New York, to receive scam proceeds from runners for CASTANOS GARCIA's call center and to transmit the money to the Dominican Republic. CASTANOS GARCIA instructed runners to hand deliver cash to NUÑEZ NUÑEZ's nephew, and the runners reported to CASTANOS GARCIA the amounts of money that they delivered to the nephew.

37. For example, in January 2023, TAVAREZ JIMENEZ sent CASTANOS GARCIA the following photograph of himself holding stacks of cash and reported that he had just delivered the cash, totaling \$189,250, to NUÑEZ NUÑEZ's nephew:



38. Bank records show that NUÑEZ NUÑEZ's nephew deposited at least \$719,510 into the same bank account in the name of the purported vaping products wholesaler, in structured amounts and at various Bank of America locations.

39. Based on messages alone, the runners deposited at least approximately \$1.4 million into accounts that NUÑEZ NUÑEZ provided and delivered approximately \$2 million to NUÑEZ NUÑEZ's nephew between approximately October 2022 and May 2023.

40. WhatsApp messages demonstrate that NUÑEZ NUÑEZ and his nephew charged CASTANOS GARCIA's operation an eight percent fee to transmit deposited or delivered scam proceeds from the United States to the Dominican Republic.

41. According to Dominican law enforcement, NUÑEZ NUÑEZ maintained a storefront in the Dominican Republic, from which he exchanged U.S. dollars for Dominican pesos, as advertised in the sign in his storefront window, photographed below:



42. Under this arrangement, NUÑEZ NUÑEZ provided cash proceeds to CASTANOS GARCIA, PUELLO GARCIA, and other co-conspirators in the Dominican Republic.

43. Messages demonstrate that CASTANOS GARCIA used some of the scam proceeds to pay call center employees, as described above.

44. According to messages and information from Dominican authorities, CASTANOS GARCIA spent grandparent scam proceeds on upgrades to his home and on luxury purchases, including the boat photographed below:



45. CASTANOS GARCIA used grandparent scam proceeds to live comfortably in the Dominican Republic, as seen in the following images of CASTANOS GARCIA from Dominican authorities and messages with co-conspirators:



IV. Defendants' Access to Cash

46. As described above, the defendants located in the United States received cash proceeds from scam victims in amounts typically totaling tens of thousands of dollars in a day.

47. The investigation revealed that these defendants used numerous bank accounts in the names of purported businesses to move money transnationally. The runners also structured deposits to avoid suspicion.

48. Based on the investigation to date, I also am aware that many, if not all, of the runners also picked up grandparent scam proceeds for other call center operations in the Dominican Republic besides CASTANOS GARCIA's operation.

V. Defendants' Access to Fake Identification Documents

49. Messages between the co-conspirators show that CASTANOS GARCIA secured fake identification documents for runners to use when making deposits of grandparent scam proceeds into bank accounts in the United States.

50. For example, in WhatsApp messages in February 2023, BAEZ SANTANA sent CASTANOS GARCIA images of fake ID cards bearing the photographs of other runners, including POLANCO BATISTA, TAVAREZ JIMENEZ, and SILVERIO BALBUENA. Bank records reflect that the runners subsequently made cash deposits under the names on these fake ID cards.

51. During the investigation, I also have observed messages concerning fake identification documents bearing the photographs of RIVERA CUETO and FERMIN VASQUEZ.

VI. Ties to the Dominican Republic and Arrests in the United States

52. Government databases reflect that each of the defendants is a citizen of the Dominican Republic. Only one of the defendants (POLANCO BATISTA) is a naturalized U.S. citizen, and one other (RIVERA CUETO) is a lawful permanent resident.

53. As of the date of this affidavit, six of the defendants live in the Dominican Republic (CASTANOS GARCIA, PUELLO GARCIA, CRUZ RODRIGUEZ, TAVAREZ JIMENEZ, JOEL MATHILDA LEON, and NUÑEZ NUÑEZ) and five of the defendants live in the United States (BAEZ SANTANA, POLANCO BATISTA, SILVERIO BALBUENA, RIVERA CUETO, and FERMIN VASQUEZ).¹

54. As described below, each of the defendants has strong ties to the Dominican Republic and (except for POLANCO BATISTA and RIVERA CUETO) weak, if any ties to the United States.

55. Moreover, the investigation revealed that several defendants continued to participate in grandparent scam pickups and collected hundreds of thousands of dollars from victims even after facing criminal charges brought by local authorities in connection with specific victims.

CASTANOS GARCIA

56. CASTANOS GARCIA at all times resided in the Dominican Republic and conducted the activity described in this affidavit from the Dominican Republic.

¹ Two defendants are detained in the United States in connection with this case. In June 2024, U.S. authorities arrested JOAN MATHILDA LEON at John F. Kennedy International Airport. A U.S. Magistrate Judge in the Eastern District of New York ordered that he be detained based on risk of flight. In August 2024, U.S. authorities arrested SANTOS BURGOS at Miami International Airport. A U.S. District Judge in the District of Massachusetts ordered that SANTOS BURGOS be detained based on risk of flight. SANTOS BURGOS pleaded guilty to the charges in this case in July 2025.

57. Border crossing records indicate that CASTANOS GARCIA has not traveled to the United States. CASTANOS GARCIA's mother resides in the United States as a lawful permanent resident. His mother applied for a U.S. non-immigrant visa for CASTANOS GARCIA in July 2023; however, U.S. Customs and Border Protection denied the application.

58. Based on the investigation to date and my review of CASTANOS GARCIA's iCloud account, I am not aware of any other immediate relatives of CASTANOS GARCIA that reside in the United States.

CRUZ RODRIGUEZ

59. CRUZ RODRIGUEZ at all times resided in the Dominican Republic and conducted the activity described in this affidavit from the Dominican Republic.

60. Investigators are not aware of any travel to the United States by CRUZ RODRIGUEZ or any immediate relatives of CRUZ RODRIGUEZ that reside in the United States.

PUELLO GARCIA

61. PUELLO GARCIA is CASTANOS GARCIA's uncle. At all times, PUELLO GARCIA resided in the Dominican Republic and conducted the activity described in this affidavit from the Dominican Republic.

62. Investigators are not aware of any travel to the United States by PUELLO GARCIA or any immediate relatives of PUELLO GARCIA that reside in the United States (aside from CASTANOS GARCIA's mother).

NUÑEZ NUÑEZ

63. NUÑEZ NUÑEZ at all times resided in the Dominican Republic and conducted the activity described in this affidavit from the Dominican Republic.

64. Border crossing records show only one trip by NUÑEZ NUÑEZ to the United States, in June and July 2023. Aside from NUÑEZ NUÑEZ's nephew in New York City (who assisted with transmitting grandparent scam proceeds from the United States to the Dominican Republic), investigators are not aware of any other immediate relatives of NUÑEZ NUÑEZ that reside in the United States.

TAVAREZ JIMENEZ

65. TAVAREZ JIMENEZ entered the United States in March 2021 on a travel visa. His visa expired in September 2021. Thereafter, he remained living in the Bronx, New York until early 2024.

66. As described above, in October 2022, police in Attleboro, Massachusetts arrested TAVAREZ JIMENEZ in connection with a pickup of grandparent scam proceeds and charged him with larceny and receiving stolen property.

67. Messages demonstrate that, after TAVAREZ JIMENEZ was released on bond in the Attleboro case, he continued to collect grandparent scam proceeds across the United States and organize other runners for CASTANOS GARCIA's operation.

68. TAVAREZ JIMENEZ learned of the FBI's investigation of CASTANOS GARCIA's operation as early as January 2024. Travel records show that, in June 2024, TAVAREZ JIMENEZ took flights from Mexico to Colombia and from Colombia to the Dominican Republic. Based on the lack of any record of TAVAREZ JIMENEZ's departure from the United States, I believe that TAVAREZ JIMENEZ crossed the border into Mexico undetected and flew through another country to hide his departure from the United States and his return to the Dominican Republic from law enforcement authorities.

69. The Attleboro case remains pending against TAVAREZ JIMENEZ, and the court issued a default warrant for TAVAREZ JIMENEZ's arrest in connection with that case.

70. Dominican authorities observed TAVAREZ JIMENEZ operating a motorbike rental shop in Puerto Plata as recently as June 2025.

71. Investigators are not presently aware of any immediate relatives of TAVAREZ JIMENEZ who reside in the United States.

JOEL MATHILDA LEON

72. JOEL MATHILDA LEON is the younger brother of JOAN MATHILDA LEON. He and his brother are citizens of both the Dominican Republic and the Netherlands.

73. Travel records demonstrate that JOEL MATHILDA LEON lived in the Dominican Republic until he entered the United States in August 2022 using his Dutch passport. Between August 2022 and April 2024, JOEL MATHILDA LEON lived in the United States without legal authorization. Flight records show that he traveled between U.S. cities during this time. Based on my review of messages obtained in the investigation, I have observed that these flights were arranged or directed by CASTANOS GARCIA or other call center operators and coincided with JOEL MATHILDA LEON's work as a runner for CASTANOS GARCIA's operation.

74. In January 2023, police in Volusia County, Florida arrested Joel Mathilda Leon in connection with a pickup. In February 2023, local police in New York arrested him in connection with several collections of grandparent scam proceeds in the Syracuse area. Court records indicate that, on March 26, 2024, JOEL MATHILDA pleaded guilty to grand larceny and conspiracy in the New York state case.

75. JOEL MATHILDA LEON departed the United States and returned to the Dominican Republic in April 2024, before his sentencing in the New York state case. He has

remained in the Dominican Republic since. The New York state court sentenced JOEL MATHILDA LEON *in absentia* to two and one-third to seven years in prison.

76. JOEL MATHILDA LEON has an aunt who lives in Providence, Rhode Island. Rideshare company records indicate that JOEL MATHILDA LEON used this aunt's address as a drop-off location for grandparent scam proceeds on at least two occasions during the relevant period. Investigators otherwise are not aware of any immediate relatives of JOEL MATHILDA LEON that live in the United States.

BAEZ SANTANA

77. BAEZ SANTANA entered the United States in January 2017 on a nonimmigrant visa. He overstayed his visa and has remained in the United States without legal status.

78. Investigators are not presently aware of any family members of BAEZ SANTANA living in the United States.

79. At all relevant times, BAEZ SANTANA lived in the Bronx, New York and conducted the activity described in this affidavit from New York and around the United States.

80. In March 2023, BAEZ SANTANA was charged with two felony counts in Volusia County, Florida for his role in defrauding an elderly victim from Deland, Florida.

81. In September 2023, BAEZ SANTANA was charged in Monmouth County, New Jersey for his role in defrauding an elderly victim from Spring Lake, New Jersey. He was arrested on those charges in October 2023. He subsequently pleaded guilty to reduced charges and was sentenced to time served (28 days) and one year of probation. He then was extradited to Volusia County and entered into a deferred prosecution agreement in the Volusia County case.

82. In total, investigators have identified over 40 victims who delivered over \$430,000 in cash to rideshare drivers ordered from accounts in BAEZ SANTANA's name between November 2022 and February 2023.

POLANCO BATISTA

83. POLANCO BATISTA lived in the United States intermittently since 2006 and permanently since 2015. He is a citizen of the Dominican Republic and a naturalized U.S. citizen.

84. Investigators are not aware of any family ties that POLANCO BATISTA has in the United States.

85. At all relevant times, POLANCO BATISTA lived in Florida and conducted the activity described in this affidavit from Florida and around the United States.

86. In total, investigators have identified over 60 victims who delivered over \$700,000 in cash to rideshare drivers ordered from accounts controlled by POLANCO BATISTA (in his own name and in others' names) between November 2022 and May 2023.

87. In January 2024, POLANCO BATISTA was arrested in Brevard County, Florida and charged with third-degree felony for his participation in a grandparent scam targeting an elderly victim in Cocoa Beach, Florida. During his arrest, POLANCO BATISTA attempted to flee his residence by exiting a first-floor window.² The charges in that case were nolle prossed in May 2025.

88. POLANCO BATISTA was arrested again in December 2024 in Pasco County, Florida and charged with larceny over \$50,000 from victims older than 65 years old. He was released on bond, and those charges are pending.

² See <https://www.clickorlando.com/getting-results/2024/02/12/cocoa-beach-detectives-stop-serial-scammer-stealing-from-elderly/>.

89. Information obtained from a subsequent search of POLANCO BATISTA's phones revealed that POLANCO BATISTA continued to use rideshare accounts (primarily in other individuals' names) to pick up cash from elderly victims even after his December 2024 arrest, including from at least 13 victims who suffered losses totaling at least \$135,900 in January and February 2025.

SILVERIO BALBUENA

90. SILVERIO BALBUENA entered the United States in September 2018 on a CR-1 visa as the spouse of a U.S. citizen. SILVERIO BALBUENA's marriage to the U.S. citizen was dissolved in 2022. Government records indicate that SILVERIO BALBUENA is not legally in the United States and is subject to removal proceedings.

91. At all relevant times, SILVERIO BALBUENA lived in Missouri and conducted the activity described in this affidavit from Missouri and around the United States.

92. In total, investigators have identified at least 25 victims who delivered over \$350,000 to rideshare drivers ordered from accounts controlled by SILVERIO BALBUENA between November 2022 and February 2023. SILVERIO BALBUENA used accounts in his own name and in the names of other individuals, including his ex-wife. Investigators identified at least 15 victims associated with trips ordered from his ex-wife's account, including a victim in Pembroke, Massachusetts.

93. Based on the investigation, I have observed that SILVERIO BALBUENA appears to have a wife or girlfriend in the United States, and that a Lyft account in this woman's name was used to make cash pickups from at least four victims. Investigators are not otherwise aware of any family ties that SILVERIO BALBUENA has to the United States.

RIVERA CUETO

94. RIVERA CUETO first entered the United States in May 2018 on a nonimmigrant visa. He returned to the Dominican Republic in August 2018 but returned to the United States in April 2019. Government records indicate that RIVERA CUETO has lawful permanent resident status in the United States. RIVERA CUETO lived in California and made semi-annual trips to the Dominican Republic during the relevant period.

95. RIVERA CUETO has been arrested on several occasions in connection with collecting cash from specific victims. In April 2023, he was arrested in Thousand Oaks, California attempting to pick up a package from a rideshare driver. The charges against him from this arrest were later dismissed in May 2024.

96. Following his April 2023 arrest, RIVERA CUETO continued to collect cash from elderly victims of grandparent scams.

97. In May 2024, RIVERA CUETO was interviewed by law enforcement officers after the officers conducted a search of RIVERA CUETO's residence in California. RIVERA CUETO stated that he knew that the money he was picking up came from elderly people who thought their grandchildren were in trouble. He admitted that he continued to participate in these scams by coordinating pickups by other runners. RIVERA CUETO stated that he knew that doing so was wrong, but he continued to participate in scams because he needed money.

98. In August 2024, RIVERA CUETO was charged by law enforcement officials in Las Vegas, Nevada in connection with pickups of cash from elderly victims in that area. Officials conducting that investigation identified over \$200,000 in losses attributable to RIVERA CUETO.

99. In January 2025, RIVERA CUETO was arrested by police in Tulare, California and charged with a felony for picking up a package containing \$9,600 from an elderly victim. On May

20, 2025, RIERA CUETO pleaded guilty to that charge and was sentenced to time served. He then was extradited to Las Vegas and released from custody pending a resolution in the Las Vegas case.

100. In total, investigators have identified over 85 victims who delivered over \$1,000,000 in cash to rideshare drivers ordered from accounts controlled by RIVERA CUETO between October 2022 and May 2023.

101. Investigators are not aware of relatives of RIVERA CUETO that live in the United States.

FERMIN VASQUEZ

102. FERMIN VASQUEZ lived in New Jersey and conducted the activity described in this affidavit from New Jersey and around the United States during the relevant period. He has no known legal status in the United States.

103. In February 2023, FERMIN VASQUEZ was arrested alongside JOEL MATHILDA LEON near Syracuse, New York while collecting grandparent scam proceeds. He pleaded guilty to grand larceny in the third degree and was sentenced to probation.

104. FERMIN VASQUEZ now resides in Maryland. Investigators are unaware of any family ties that FERMIN VASQUEZ has to the United States.

105. Messages and bank records demonstrate that, between December 2022 and February 2023 alone, FERMIN VASQUEZ deposited or delivered approximately \$100,000 in cash from grandparent scams.

VII. Conclusion

106. As described herein, the investigation revealed extensive documentary evidence of CASTANOS GARCIA's call center operations, network of runners, and methods for transmitting

scam proceeds to the Dominican Republic. The documentary evidence illustrates the role that each of the charged defendants played in the operation.

107. The conduct that the defendants engaged in provided defendants with ready access to cash and channels for transmitting cash to the Dominican Republic. Moreover, each of the defendants maintains strong ties to the Dominican Republic and weak or no ties to the United States.

Signed under the pains and penalties of perjury this 12th day of August 2025.

/s/ Terrence Dupont
Special Agent Terrence Dupont
Federal Bureau of Investigation