UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.
MARC E. SAUNDERS

Defendant(s)

Case No. 17-MJ-2034(JS)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 8/28/2015 to on/about 12/6/2016 in the county of Camden in the District of New Jersey, the defendant(s) violated:

Code Section	*Offense Description*
Title 18, United States Code, Sections 500 and 2,	Presenting unlawfully issued and imprinted Postal Service money orders with intent to defraud
Title 18, United States Code, Sections 1711 and 2.	While a United States Postal Service employee, converting to his own use Postal Service property

This criminal complaint is based on these facts:

See Attachment B.

☑ Continued on the attached sheet.

Complainant's signature

David Bannan, Special Agent, USPS/OIG
Printed name and title

Sworn to before me and signed in my presence.

Date: 08/14/2017

Judge's signature

City and state: Camden, New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge
Printed name and title

COUNT 1

From on or about August 28, 2015 to on or about December 6, 2016, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

MARC E. SAUNDERS,

with intent to defraud the United States Postal Service, did transmit, present, and cause to be transmitted and presented, United States Postal Service money orders, knowing the same (1) to contain a stamped impression, that is, an amount of United States currency, (2) to have been unlawfully issued without previous payment of the amounts required to be paid upon such issue, and (3) to have been stamped and imprinted without lawful authority.

In violation of Title 18, United States Code, Sections 500 and 2.

COUNT 2

From on or about August 28, 2015 to on or about December 6, 2016, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

MARC E. SAUNDERS,

being a United States Postal Service employee, did use and convert to his own use property, that is, approximately 180 blank Postal Service money order forms and a money order imprinting machine having a total value exceeding $1,000, all of which came into his hands and was under his control in the execution of and under color of his employment.

In violation of Title 18, United States Code, Sections 1711 and 2.

UNITED STATES DISTRICT COURT
for the
District of New Jersey

ORIGINAL FILED
AUG 14 2017
WILLIAM T. WALSH, CLERK

United States of America
v.
ANDRE M. SUTTON

Defendant(s)

Case No. 17-MJ-2036(JS)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 9/15/2016 to on/about 12/6/2016 in the county of Camden in the District of New Jersey, the defendant(s) violated:

Code Section	*Offense Description*
Title 18, United States Code, Sections 500 and 2,	Presenting unlawfully issued and imprinted Postal Service money orders with intent to defraud

This criminal complaint is based on these facts:

See Attachment B.

☑ Continued on the attached sheet.

Complainant's signature

David Bannan, Special Agent, USPS/OIG

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/14/2017

Judge's signature

City and state: Camden, New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

COUNT 1

From on or about September 15, 2016 to December 6, 2016, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

ANDRE M. SUTTON,

with intent to defraud the United States Postal Service, did transmit, present, and cause to be transmitted and presented, United States Postal Service money orders, knowing the same (1) to contain a stamped impression, that is, an amount of United States currency, (2) to have been unlawfully issued without previous payment of the amounts required to be paid upon such issue, and (3) to have been stamped and imprinted without lawful authority.

In violation of Title 18, United States Code, Sections 500 and 2.

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Jersey

ORIGINAL FILED

AUG 14 2017

WILLIAM T. WALSH, CLERK

United States of America v. ANTHONY J. BELL *Defendant(s)*	)))))))	Case No. 17-MJ-2035(JS)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 8/28/2015 to on/about 10/26/2015 in the county of Camden in the ______ District of New Jersey, the defendant(s) violated:

Code Section	*Offense Description*
Title 18, United States Code, Sections 500 and 2	Presenting unlawfully issued and imprinted Postal Service money orders with intent to defraud

This criminal complaint is based on these facts:

See Attachment B

☑ Continued on the attached sheet.

Complainant's signature

David Bannan, Special Agent, USPS/OIG

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/14/2017

Judge's signature

City and state: Camden, New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

COUNT 1

From on or about August 28, 2015 to October 26, 2015, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

ANTHONY J. BELL,

with intent to defraud the United States Postal Service, did transmit, present, and cause to be transmitted and presented, United States Postal Service money orders, knowing the same (1) to contain a stamped impression, that is, an amount of United States currency, (2) to have been unlawfully issued without previous payment of the amounts required to be paid upon such issue, and (3) to have been stamped and imprinted without lawful authority.

In violation of Title 18, United States Code, Sections 500 and 2.

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America
v.
EUGENE J. BOWEN

Defendant(s)

Case No. 17-MJ-2037(JS)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/18/2016 to on/about 9/1/2016 in the county of Camden in the ______ District of New Jersey, the defendant(s) violated:

Code Section	*Offense Description*
Title 18, United States Code, Sections 500 and 2	Presenting unlawfully issued and imprinted Postal Service money orders with intent to defraud

This criminal complaint is based on these facts:

See Attachment B

☑ Continued on the attached sheet.

Complainant's signature

David Bannan, Special Agent, USPS/OIG

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/14/2017

Judge's signature

City and state: Camden, New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

COUNT 1

From on or about July 18, 2016 to September 1, 2016, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

EUGENE J. BOWEN,

with intent to defraud the United States Postal Service, did transmit, present, and cause to be transmitted and presented, United States Postal Service money orders, knowing the same (1) to contain a stamped impression, that is, an amount of United States currency, (2) to have been unlawfully issued without previous payment of the amounts required to be paid upon such issue, and (3) to have been stamped and imprinted without lawful authority.

In violation of Title 18, United States Code, Sections 500 and 2.

ATTACHMENT B

AFFIDAVIT

1. I, David Bannan, am employed as a Special Agent by the United States Postal Service ("USPS"), Office of the Inspector General ("OIG"), assigned to the Philadelphia, Pennsylvania Field Office. I began working for the USPS-OIG as a Special Agent in July 2015. This affidavit is based on my own participation in this investigation, briefings with other law enforcement officers, and interviews and briefings with witnesses. I also have reviewed other evidence, including toll records, a forensic lab report, surveillance video, and social media accounts. I have not included in this affidavit all of the facts known to me. Rather, I have included only those facts which I believe are necessary to establish probable cause. In instances where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. All conversations or interviews that are referred to in this affidavit are set forth in substance and in part.

2. MARC SAUNDERS is a USPS employee who is suspected of having stolen a money order imprinting machine and almost 200 blank money orders from the New Lisbon, New Jersey branch of the USPS. Law enforcement believes that Saunders imprinted many of these blank money orders and recruited middlemen to recruit others to negotiate the money orders during the period from approximately August 2015 to December 2016 ("the relevant period").

BACKGROUND

3. The USPS issues and sells Postal Money Orders ("M.O.") at all its branches. In the past, blank M.O. were issued to all branches, along with a M.O. imprinting machine (similar to a check writing machine). The USPS refers to such a branch as a "manual office"; a few still exist. Each blank M.O. is pre- printed (before it is issued to a manual office) with a unique serial number. The USPS developed an internal bookkeeping and control system for M.O. Each manual office maintains a M.O. control log book. That book contains entries for the specific blank M.O. that a central post office issued to it; those blank M.O. constitute the M.O. inventory at that branch. Each employee of the branch who sells M.O. to the public is issued blank M.O.; the log book also contains entries for the specific M.O. issued to those employees. The log book refers to all M.O. by their serial numbers. As each employee sells M.O., he/she retains the USPS copy of each M.O. sold (the blank M.O. has multiple carbon copies attached). At the end of each day, the employee fills out a USPS form showing all his/her sales that day. The information on that form is eventually transmitted to a USPS accounting service center (in St. Louis, Missouri) that keeps track of all M.O. issued in the United States, again by serial numbers.

4. To issue a M.O. to a customer, an employee at the manual office would obtain information provided by a purchaser, that is, the amount of the M.O. The employee then would enter that amount into the M.O. imprinting machine, insert the blank M.O., and the machine would then imprint that amount onto the M.O. The employee would receive money from the purchaser, consisting of (a) the amount of the M.O., and (b) the USPS fee for issuing the M.O. As noted above, the employee would keep the USPS carbon copy ("the voucher," which is the USPS's/employee's receipt for that sale) of that M.O. and at the end of each day, tally up and record the serial number and dollar value of each M.O. sold. The customer receives the M.O., along with an attached carbon copy (the customer receipt). When the customer writes the name of the payee on the M.O., the carbon copy has that name, too. The customer can keep that carbon copy if he/she so chooses. A photograph of an old style blank M.O. is attached hereto as Exhibit 1. When a customer purchases a M.O. at a USPS branch, the USPS employee imprints the M.O. not only with the amount, but also with the date and the zip code for the USPS branch. The customer, not the USPS employee, decides whether to write on the M.O. information on the "Pay To" and/or "From" lines. In my experience, some customers do this at the time of purchase, others do it later, while others never do it.

5. When a payee negotiates a Postal M.O., whether it be at a USPS branch or at some financial institution, the receiving entity retains the M.O. (but usually not for long; most financial institutions today create and retain digital copies of negotiable instruments and then the actual instrument is discarded). The information on the M.O. eventually is communicated to the USPS St. Louis service center.

6. Several years ago, the USPS changed the way it issues and sells M.O. The USPS still uses blank M.O., but those blank M.O. forms have been changed; they do not look like the old blank M.O. In addition, the M.O. imprinting machine is no longer used. Instead, a computerized printer is used. It should be noted that the old blank M.O. forms are not compatible with the new system/printer and therefore cannot be imprinted by the new computerized printers.

7. Information provided by the purchaser is entered into the computer, which (a) imprints the blank M.O., and (b) electronically routes the information to a central computer maintained by the USPS. In that manner, a record of all M.O. issued is created and maintained by the USPS, but now the record is all digital. The only information that a customer would manually add to the M.O. are the names of the customer and the payee. The USPS refers to branches that have converted to the computerized M.O. system as "POS" (which is an abbreviation for "point of service"). Most branches today, with the exception of some small and/or rural offices, are POS branches. When a branch converted from a manual office to a POS branch, the procedure that was supposed to be followed

was that the postmaster for the branch collected all old blank M.O. forms and the M.O. imprinting machine and returned them to a central post office.

THE INVESTIGATION

8. In or about February 2013, the New Lisbon, New Jersey branch of the USPS was converted to the new M.O. system. A computerized printer was installed and new blank M.O. to be used with that printer were issued to that branch. At that point, the branch was no longer authorized to issue, and should not have issued, old style M.O. using the imprinting machine. At the time of the branch's transition to the POS system, the Postmaster of that branch (now retired) returned a number of (but not all) old, now obsolete blank M.O. forms to the central post office.

9. In or about November 2016, more than three years after the aforementioned transition at the New Lisbon branch to the new (POS) system, another USPS employee notified me that a number of old M.O. had been negotiated in recent months in the Philadelphia, Pennsylvania area, but there were no USPS records indicating that any USPS branch had ever issued them, that is, sold them to customers. As a result, I suspected that these M.O. had been stolen—as blank M.O. forms—from some USPS branch, imprinted with an old M.O. imprinting machine, and then negotiated. Using the serial numbers of these negotiated M.O., I was able to determine that these M.O. had originally been issued to the New Lisbon branch prior to February 2013. I learned that the old M.O. imprinting machine that was assigned to that branch was no longer at that branch, but there is no record of it ever having been returned to a central post office. To date, I have been unable to determine when it was removed from that branch or, in general, what happened to it.

10. On or about January 12, 2017, I interviewed the former New Lisbon postmaster referred to above. She told me the following, in substance and in part. She said that when the New Lisbon branch became a POS branch, she returned to the central post office unopened packages of old blank M.O. forms, but did not destroy loose old blank ones and record that destruction in the control log, as required. In addition, although she wanted to store the old imprinting machine in the office safe (until she could return it to the central post office), it did not fit, so she stored it in a cabinet. Later, in June 2013, she was transferred to another branch. She said that as far as she knew, the M.O. imprinting machine was still at the New Lisbon branch when she was transferred.

11. A USPS employee named MARC SAUNDERS did not begin working at the New Lisbon branch until after the aforementioned former postmaster was transferred; he began working there in or about April 2014. At that time, there were one or two other employees at that branch, including the postmaster. During the relevant period, a total of about ten employees worked at one time or another in the New Lisbon branch, but never more than one or two at a time,

including MARC SAUNDERS. Currently, MARC SAUNDERS works at a different USPS branch (Hainesport, New Jersey); he began working there in September 2015.

12. At this point of the investigation, I concluded that the old blank M.O. forms and M.O. imprinting machine had been stolen, but I did not know whether they were stolen by a USPS employee or an outside individual. There was no report of a burglary or robbery ever having occurred at the New Lisbon branch. As a result, I concluded that the perpetrator was most likely a USPS employee who is or was assigned to the New Lisbon branch.

Evidence Pointing to an Inside Job

13. I learned that when the old style M.O. imprinting machine is assigned to a manual office, the machine is calibrated by the central post office so that it will imprint blank M.O. with the zip code for that USPS branch. One of the things I noticed from a review of USPS records of the stolen M.O. was that none of them had the New Lisbon branch zip code imprinted on them. The zip codes that were imprinted are for locations all over the United States. After I made further inquiry, I learned that it is possible for anyone to recalibrate the machine to change the zip code it will imprint on blank M.O. This capability is not obvious, however, from looking at the machine. In addition, USPS employees do not scrutinize the zip code on a M.O., having been imprinted by a machine, when a payee goes to a USPS branch to negotiate a M.O. (that zip code is irrelevant to the negotiation process). So there would be no particular reason for someone who has a stolen M.O. imprinting machine to recalibrate, much less frequently recalibrate, the machine. However, if an employee at a USPS branch stole the machine from that branch, he might think that changing the zip code calibration might divert attention away from that branch, and hence might make law enforcement's detection of his theft more difficult.

14. From my examination of the USPS records of the stolen blank M.O., I learned that with three exceptions, all the stolen M.O. that have been negotiated to date have been negotiated at USPS branches. Any USPS employee who sells USPS M.O. would know that a payee who walks into a USPS branch with a USPS M.O. only needs a photo ID to negotiate that M.O. No bank account or other information is requested. And since the M.O. in this case were real USPS M.O., they likely would be accepted without question. All of this would make detection of a forged stolen M.O. more unlikely if a payee limited him/herself to USPS branches to negotiate these stolen M.O. In addition, one of the middlemen, ANTHONY BELL, told one of the payees to cash the M.O. at USPS branches. See ¶ 17 below.

15. The last stolen M.O. was negotiated on or about December 6, 2016 in Philadelphia. A total of about 182 blank M.O. forms were stolen from the New Lisbon USPS branch. To date, about 133 have been negotiated, with a total

face/cash value of approximately $100,000, which means that about 50 blank money orders that were stolen have not yet surfaced. To date, neither the remaining stolen blank M.O. nor the M.O. imprinting machine have been recovered. Almost all of the stolen M.O. have been negotiated at USPS branches in Philadelphia, Pennsylvania and Knoxville, Tennessee; one was negotiated in New Jersey and a few were negotiated in or about York, Pennsylvania.

16. As noted above, the advantage of presenting and negotiating a USPS M.O. at a USPS branch is that the payee simply must present some form of identification with a name that matches the payee's name on the M.O.[1] Postal regulations require the USPS employee to record the identification number (for example, the number of a driver's license used by the payee) on the M.O. In my experience, USPS employees almost always comply with this regulation. This is how investigators are able to determine the identities of payees.

<u>The Connections Between SAUNDERS, N.M., ANTHONY BELL (middleman) and M.M.</u>

17. The United States Postal Inspection Service ("USPIS") is the agency that is tasked with investigating crimes external to the USPS, meaning committed by non-employees. My agency, on the other hand, investigates internal crime, meaning crime committed by USPS employees. In or about late 2015, before I became involved in this investigation, the USPIS, after learning that the stolen M.O. were being negotiated, began investigating. The USPIS, however, initially believed (wrongly, as it turns out) that these M.O. were counterfeit, rather than stolen, because they were being negotiated in a number of different geographic locations. As a result, a Postal Inspector tracked down several of the payees and interviewed them. On or about November 13, 2015, law enforcement officers interviewed one of the payees, N.M., who stated that he had obtained the M.O. from a person he knew as "Dan." "Dan" told N.M. to cash the M.O. at different USPS branches in Philadelphia. He also told N.M. that he had a connection with the post office and that is how he got the M.O. N.M. provided his own cell phone number and the phone number he had for "Dan" (267-684-9957). I obtained records from the telephone service provider ("TSP") for "Dan's" phone number, which showed that (a) this telephone number was subscribed to by ANTHONY BELL, and (b) that during the relevant period, the cell phone to which ANTHONY BELL's telephone number was assigned ("the ANTHONY BELL cell phone") was communicating with the cell phone to which MARC SAUNDERS' telephone number was assigned ("the MARC SAUNDERS cell phone"). Their communications, however, stopped in or about February 2016. I also learned that on the same date that the Postal Inspector interviewed N.M., after the interview ended the N.M. cell phone to which N.M.'s telephone number was assigned contacted the ANTHONY BELL cell phone. About two days later, on or

[1] In contrast, if a payee tried to negotiate a M.O. at a bank, most banks, in my experience, would require the payee to have an account at that bank.

about November 15, 2015, the ANTHONY BELL cell phone contacted the MARC SAUNDERS cell phone.[2]

18. For unknown reasons, no stolen M.O. were negotiated between approximately December 16, 2015 and May 1, 2016. But a closer examination of USPS M.O. records reveals that the stolen M.O. negotiated just prior to the interview of N.M. was negotiated by N.M. (in Havertown, Pennsylvania on October 26, 2015). The first stolen M.O. negotiated after law enforcement interviewed N.M. was not negotiated in the Philadelphia area, but instead was negotiated in Jersey City, New Jersey on or about November 20, 2015. And on or about December 14-15, 2015, about nine stolen M.O. were negotiated in or around York, Pennsylvania. When the negotiation of the stolen M.O. began again in May 2016, they were all negotiated in the Philadelphia metropolitan area, with the exception of 24 stolen M.O. negotiated in the Knoxville, Tennessee area.

19. I learned from the USPIS that on or about September 10, 2015, another payee, M.M., who negotiated approximately 15 of the stolen M.O. (all of which had been imprinted with a USPS M.O. imprinting machine of the type used by manual offices), negotiated one of them at a certain USPS branch. On that occasion, however, not only did M.M. negotiate one of the stolen M.O., but he also purchased a legitimate M.O. in the amount of $100. I learned that the payee on that M.O. was MARC SAUNDERS. That M.O. was subsequently negotiated a few days later, on September 19, 2015; the name "MARC SAUNDERS" was filled in on the "Pay To" and "From" lines on the M.O. That M.O. also contained the following address: 621B Country Club, Mt. Laurel, New Jersey 08054. I later learned that at that time, MARC SAUNDERS lived in an apartment complex at 621 Country Club Parkway in Mt. Laurel, New Jersey, in Apartment B.

20. In addition, I learned that the aforementioned $100 M.O. payable to MARC SAUNDERS was negotiated at the Vincentown, New Jersey USPS branch. I reviewed USPS records of the Vincentown branch for the date that M.O. was negotiated and learned that (a) MARC SAUNDERS was assigned to and working at that branch on that date, and (b) one of Saunders' co-workers cashed the M.O. that Saunders apparently presented to the co-worker.[3] I also reviewed the

---

[2] Investigation has revealed that MARC SAUNDERS owns and uses an iPhone. His TSP is Verizon Wireless. Law enforcement subpoenaed records for his account with Verizon Wireless, which confirmed that he has an account in his name for the telephone number 609-731-7452. In December 2016, I met with the postmaster at a USPS branch in southern New Jersey. The postmaster agreed to work with me to confirm that MARC SAUNDERS uses the cell phone to which the aforementioned telephone number is assigned. The postmaster called that telephone number in my presence and then had a conversation over his telephone. After the conversation/call ended, the postmaster advised me that MARC SAUNDERS answered his call and they had a discussion over the telephone at that time.

[3] USPS regulations prohibit USPS employees from conducting transactions involving their own purchase or negotiation of USPS products, including M.O. It appears that such regulations were followed on this occasion.

USPS personnel file of MARC SAUNDERS; it contains numerous samples of his signature. I compared those samples to the endorsement on the aforementioned $100 M.O. and the signature on the M.O. appears to be the signature of MARC SAUNDERS.

21. On or about May 25, 2017, I interviewed M.M. regarding the 15 stolen New Lisbon M.O. he negotiated between August 28, 2015 to October 23, 2015 (for a total of $12,349.46). During the interview, M.M. admitted to cashing the USPS M.O. but added he was unaware they were stolen. He said he received these USPS M.O. in return for working construction jobs. He alleged he and a friend named "Daniel" worked in construction for a white male, possibly named "John." According to M.M., John would drive M.M. to Post Office branches in Philadelphia, Pennsylvania to cash these USPS M.O. He added he would receive $175 in return for his labor and negotiating each USPS M.O. His friend "Daniel" (who did not cash any USPS M.O.) would also receive $175. John would keep the remaining funds left over. M.M. mentioned his friend Daniel was killed last year.

22. I calculated that M.M. received approximately $2,626 ($175 x 15 M.O.) in total for negotiating the USPS M.O. M.M. agreed and said that total sounded right. I asked M.M. if he knew anyone by the name of ANTHONY BELL. M.M. initially responded "no," but then commented that he has heard of him but does not "mess with him." M.M. stated that his cousin received a lengthy prison sentence because of ANTHONY BELL. It should be noted that despite this last statement of M.M. denigrating ANTHONY BELL, M.M.'s Facebook page is friends with ANTHONY BELL's Facebook page. M.M. also resides around the corner from ANTHONY BELL's place of employment.

23. I asked M.M. if he ever purchased a USPS M.O. while negotiating a stolen USPS M.O. (as noted earlier, M.M. purchased a M.O., which MARC SAUNDERS subsequently negotiated on September 19, 2015 at the Vincentown Post Office branch at which MARC SAUNDERS worked). M.M. said, "No, I don't remember." I asked M.M. if he knew anyone by the name of MARC SAUNDERS. M.M. replied, "Never heard of him."

24. After I explained relevant investigative findings to M.M., he changed his story and admitted that he received the USPS M.O. from ANTHONY BELL as well as from "John," who he had mentioned earlier. M.M. explained that ANTHONY BELL and John were in "cahoots." M.M. said he asked ANTHONY BELL and John if the USPS M.O. were legal; they responded that he would not get into trouble for negotiating them. M.M. added he needed the money. M.M. said that after he cashed the M.O. and kept $175, he would give the remaining funds to John.

The Tennessee Connection – EUGENE BOWEN (middleman)

25. From approximately July 18, 2016 to September 1, 2016, about 22 stolen USPS M.O. were negotiated at various USPS branches in the Knoxville, Tennessee area; another two were negotiated at banks in that area. All of those M.O. were traced to the New Lisbon branch; all had been issued to that branch prior to February 2013. The following individuals negotiated these money orders: T.L. (9 M.O.); N.C. (6); B.J. (3); M.R. (3); F.S. (2); and A.J. (1).

26. A review of the cell phone records of MARC SAUNDERS revealed that his cell phone communicated with a cell phone number, 865-236-3610, subscribed to by EUGENE BOWEN ("the EUGENE BOWEN cell phone").[4] My investigation revealed that EUGENE BOWEN appears to be a relative of MARC SAUNDERS; EUGENE BOWEN originally was from Philadelphia, Pennsylvania, but now resides in Tennessee. The communications between these two cell phones began on or about July 8, 2016 and continued regularly into September 2016, with one additional telephone contact in early December 2016. As noted in the paragraph above, the stolen M.O. negotiated in the Knoxville, Tennessee area appeared there starting on or about July 18, 2016 and continued to in or about September 2016. The records also indicated that MARC SAUNDERS and EUGENE BOWEN communicated by text messaging several hundred times between July 2016 and December 2016. Despite the fact that I obtained records for both the MARC SAUNDERS cell phone and the EUGENE BOWEN cell phone starting in July 2015, and despite the fact that they are cousins, there were no text messages sent between those two phones until July 2016, when the stolen New Lisbon M.O. started appearing in the Knoxville, Tennessee area.

27. I found a public Facebook page for EUGENE BOWEN and examined the information posted thereto. On or about July 3, 2016, EUGENE BOWEN posted "Dam [sic] it feels good to be back home." About eight days later, he posted "3 more days till I go back to Tennessee ima miss my home town philly." The Facebook page also showed that he answered a friend's comment asking where in Tennessee EUGENE BOWEN planned on returning to; EUGENE BOWEN responded "Knoxville." On or about July 14, 2016, EUGENE BOWEN posted "On my way back to Tennessee."

28. I received additional records from the TSP for the aforementioned telephone number subscribed to by EUGENE BOWEN. A review of those records shows that EUGENE BOWEN was in telephonic contact with payee B.J.; that is, his telephone appears to have communicated with a cell phone to which a

[4] Law enforcement obtained this information and data using an administrative subpoena that requested call detail records and subscriber information for Saunders' telephone number/account between July 2015 and December 2016.

telephone number subscribed to by B.J. was assigned.[5] In particular, B.J. negotiated three stolen M.O., two on July 21, 2016 and one on July 28, 2016 (for a total of $2,100) at Post Office branches in Knoxville, Tennessee. Based on my review of records for the telephone number subscribed to by EUGENE BOWEN (those records begin in July 2015), the first such telephonic contact was on July 28, 2016. Several additional telephonic contacts occurred in subsequent months.

29. Through further examination of EUGENE BOWEN's public Facebook page, law enforcement determined that he is Facebook friends with payee B.J.; that is, a Facebook page that appears to have been created and maintained by B.J. and a Facebook page created and maintained by EUGENE BOWEN are associated. Additionally, law enforcement determined through internet reconnaissance and a subsequent interview of EUGENE BOWEN that EUGENE BOWEN knows B.J. and has a child with B.J.'s sister, T.N. (T.N. did not negotiate any USPS M.O.).

30. On or about June 13, 2017, I interviewed payee N.C., who negotiated six stolen USPS M.O. at Post Offices branches in the Knoxville, Tennessee area from August 5, 2016 to September 1, 2016 (for a total of $4,980). N.C. admitted she cashed six USPS M.O. N.C. denied receiving these M.O. from EUGENE BOWEN, but explained she knows EUGENE BOWEN and he (EUGENE BOWEN) has a child with her best friend, T.N. (payee B.J.'s sister). N.C. added she met EUGENE BOWEN from being around the homeless shelters in Knoxville, Tennessee. N.C. alleged that she received these USPS M.O. from a man named X.G. who resides in Virginia and with whom she previously had relations. At this point in time, I am not aware of any evidence that N.C. received these USPS M.O. from an X.G. who resides in Virginia. Based on a LexisNexis Accurint query, there is no such person by the name of X.G. with the spelling N.C. provided.

31. On or about June 12, 2017, a day prior to the interview of N.C., I left a business card containing my cell phone number with N.C.'s neighbor/aunt and requested that N.C. call me to arrange a time to be interviewed. N.C. subsequently called my cell phone from cell phone number 865-927-6719 to set up the interview.

32. Upon further examination of the aforementioned cell phone records of EUGENE BOWEN, provided by the TSP, it was determined that the EUGENE BOWEN cell phone was in telephonic contact with the cell phone number N.C. used to contact me ("the N.C. cell phone"). The N.C. cell phone was in contact with the EUGENE BOWEN cell phone during the period N.C. cashed the six stolen New Lisbon M.O. Specifically, the EUGENE BOWEN cell phone first

[5] Law enforcement obtained B.J.'s cell phone number from a LexisNexis Accurint Phone Detail Report. Currently, there is an outstanding administrative subpoena for subscriber information and toll records for this cell phone number.

contacted the N.C. cell phone on August 5, 2016, the first day N.C. cashed stolen New Lisbon M.O. (two were cashed on this day).[6] These two cell phones also were in communication on August 8, 2016 and September 1, 2016, days on which N.C. cashed additional stolen New Lisbon M.O. These cell phones, however, also communicated on days that N.C. did not negotiate stolen USPS M.O.

33. On or about June 12, 2017, I interviewed EUGENE BOWEN. During questioning, EUGENE BOWEN initially denied knowing anyone by the name of MARC SAUNDERS. After being presented with several relevant case facts (cell phone records, Facebook posts, etc.), EUGENE BOWEN admitted that MARC SAUNDERS is his cousin and that he knows him. EUGENE BOWEN denied knowing anything about stolen USPS M.O. EUGENE BOWEN advised that he typically stays at "missions" (homeless shelters) in the Knoxville, Tennessee area. According to LexisNexis Accurint reports and from information provided by several employees at these Knoxville, Tennessee homeless shelters, several of the individuals in the Knoxville, Tennessee area who negotiated these stolen New Lisbon M.O. use or have used these homeless shelters.

34. On June 14, 2017, about 30 minutes apart, I received at my office by facsimile transmission two almost identical letters, one with EUGENE BOWEN'S name and (addresses associated with him) on it and the other with N.C.'s name (and addresses associated with her) on it. In substance, the letters challenged my agency's authority to investigate these matters and utilized language from the "sovereign citizens" trove of documents utilized by various people to challenge the authority of the courts to adjudicate their guilt. It should be noted that these almost identical letters were transmitted to my office in the same manner on the same date despite N.C. having told me previously that she did not receive from EUGENE BOWEN the USPS M.O. she negotiated.

<u>The Connection Between MARC SAUNDERS, ANDRE SUTTON (middleman) and Payee T.M-B</u>

35. On five dates between October 17 and December 6, 2016, T.M-B negotiated six stolen New Lisbon M.O. (for a total of $3,960) at several USPS branches in Philadelphia, Pennsylvania. Four of the six M.O. were negotiated at the Point Breeze USPS branch (in south Philadelphia). I obtained video surveillance footage from that branch for two of the dates—November 18, 2016 and December 6, 2016—and examined that footage. Previously, I found that T.M-B had a Facebook page and she posted her photograph on it. When I reviewed the video footage, I saw a person whom I believed to be T.M-B at the branch counter. She even appeared to be wearing some of the same clothing that she was wearing in her Facebook photograph. In addition, a review of records for the MARC SAUNDERS cell phone showed that on August 16, 2016,

[6] I obtained records for the EUGENE BOWEN cell phone; they began in July 2015. I am awaiting the provision of records for the N.C. cell phone, which I recently subpoenaed.

the MARC SAUNDERS cell phone and a cell phone with a telephone number assigned to T.M-B communicated with each other by both phone and text messages.

36. On or about May 17, 2017, I spoke to T.M-B regarding the stolen USPS M.O. T.M-B admitted she negotiated six USPS M.O. at several USPS branches in Philadelphia, Pennsylvania. T.M-B said she received the USPS M.O. from an individual she knew by the name of "Andre." T.M-B showed me a contact saved in her cell phone under the name "Andre." The phone number associated with this contact in T.M-B's cell phone was 215-403-4730.[7] T.M-B confirmed this was the number Andre contacted her from. T.M-B described Andre as a short black male with a large nose. T.M-B denied knowing anyone by the name of MARC SAUNDERS. T.M-B could recall Andre using her cell phone in the past, which might explain why her cell phone communicated with the MARC SAUNDERS cell phone on August 16, 2016.

37. Through review of T.M-B's cell phone records provided by the TSP, I determined that the cell phone with number 215-403-4730, which was associated with "Andre" ("the ANDRE SUTTON cell phone"), was in telephonic contact with the cell phone number subscribed to by T.M-B on each day T.M-B negotiated a stolen USPS M.O. except for one day.

38. I conducted additional review of MARC SAUNDERS' cell phone records provided by the TSP. I discovered that the phone number T.M-B provided for Andre, 215-403-4730, was in telephonic contact with the MARC SAUNDERS cell phone numerous times starting on October 13, 2016. T.M-B first negotiated a stolen New Lisbon M.O. on October 17, 2016.

39. Recently, I discovered that MARC SAUNDERS' brother (D.S.) has a public Facebook page. I also discovered that D.S. has a Facebook friend named "Andre Suttun." While examining Andre Suttun's Facebook page, I noticed out of the seven of Suttun's Facebook friends, one was D.S. and another was K.T., an individual who cashed a stolen New Lisbon M.O. on September 15, 2016 at a USPS branch in Philadelphia, Pennsylvania. I subsequently queried a LexisNexis Accurint Report and Pennsylvania ID photograph for Andre Suttun. Law enforcement determined that his last name is in fact spelled Sutton. ANDRE SUTTON's Pennsylvania ID photograph appeared to be the same individual on the "Andre Suttun" Facebook page. ANDRE SUTTON's Pennsylvania ID photograph also matches the description T.M-B provided.

[7] Records for this telephone number recently were obtained. A review of these records confirmed the previous links uncovered between this telephone number and T.M-B and MARC SAUNDERS. It should be noted that there is no subscriber information in these records for this telephone number. I believe this number is associated with a disposable cell phone.

40. On or about May 18, 2017, I presented ANDRE SUTTON's Pennsylvania ID photograph to T.M-B (without any names or identifiers on the document). T.M-B immediately confirmed that the man depicted in the photograph was the individual who provided her with the stolen USPS M.O. and asked her to negotiate them.

41. On or about May 19, 2017, I interviewed K.T. (who negotiated a stolen New Lisbon M.O. and was Facebook friends with "Andre Suttun"). K.T. admitted to negotiating the single USPS M.O. She explained that a short black male with a large nose asked her to cash the USPS M.O. for him because he did not have an ID (needed to cash a USPS M.O.). K.T. said she knew the black male from the neighborhood but could not remember his name at the time. K.T. advised she did not receive any money for cashing it. She added she did not have a phone number for the individual who gave her the M.O. to negotiate. I then showed K.T. ANDRE SUTTON's Pennsylvania ID photograph (without any names or identifiers on the document). K.T. confirmed he was the individual that gave her the USPS M.O. to negotiate. Later that day, K.T. left a voicemail message on my desk telephone advising that the individual who gave her the stolen M.O. follows her Instagram account (social networking application). K.T. stated that this individual's username is "AndreSutton1."

42. On or about June 1, 2017, I interviewed ANDRE SUTTON. I asked him if he knew anyone by the name of MARC SAUNDERS. ANDRE SUTTON initially denied knowing anyone with this name. He also denied knowing anyone by the names of D.S., T.M-B or K.T. After confronting ANDRE SUTTON with investigative findings, he admitted that he was friends with MARC SAUNDERS as well as his brother, D.S. ANDRE SUTTON identified MARC SAUNDERS when shown a photograph of him. ANDRE SUTTON explained that D.S. approached him a few years ago; D.S. gave him 8-10 USPS M.O. and instructed him to recruit other persons with identifications to negotiate those M.O. ANDRE SUTOTN could not recall recruiting a person by the name of T.M-B, but after being shown a photograph of T.M-B, ANDRE SUTTON remembered recruiting her to negotiate some of the stolen New Lisbon M.O. I showed ANDRE SUTTON a photograph of M.D., another individual who cashed a stolen New Lisbon M.O., and asked if he recruited her to negotiate a stolen USPS M.O. ANDRE SUTTON said he could have possibly recruited her when he was getting high in the Kensington Avenue area (in northeast Philadelphia, Pennsylvania).

43. I asked ANDRE SUTTON if he recalled using cell phone number 215-403-4730 (the number in T.M-B's cell phone under the contact name "Andre"). He could not recall if this was his cell phone number. ANDRE SUTTON advised that he went to high school with MARC SAUNDERS. He added they would hang out and go fishing together. ANDRE SUTTON said he received the USPS M.O. from D.S. and does not recall MARC SAUNDERS ever mentioning M.O. ANDRE SUTTON advised that he spoke to MARC SAUNDERS about two months ago (in approximately April 2017), right before he (Sutton) was arrested for a "hot" urine

sample. He added that MARC SAUNDERS visited him the last time he (Sutton) was in a recovery house. ANDRE SUTTON advised that he has not talked to D.S. in a while. ANDRE SUTTON reiterated that he never received any USPS M.O. from MARC SAUNDERS, only from D.S. He also said that he was not aware that MARC SAUNDERS worked for the USPS.

44. ANDRE SUTTON said he was usually paid $50.00 per negotiated M.O. and the individuals who negotiated the USPS M.O. for ANDRE SUTTON received approximately $100 per M.O. He would provide the remainder of the funds to D.S.

45. I asked ANDRE SUTTON if he knew a person by the name of EUGENE BOWEN. ANDRE SUTTON confirmed that he knew EUGENE BOWEN and added that he used to play football with him. ANDRE SUTTON confirmed that EUGENE BOWEN is related to MARC SAUNDERS and D.S. ANDRE SUTTON also confirmed that he knew a person by the name of ANTHONY BELL; they grew up in the same neighborhood. ANDRE SUTTON added he was unaware that EUGENE BOWEN and ANTHONY BELL are involved with the USPS M.O.

EXHIBIT 1

UNITED STATES POSTAL SERVICE

POSTAL MONEY ORDER

Serial Number	Year, Month, Day	Post Office	U.S. Dollars and Cents
50715921835	170202	083260	***1*00

Pay to

Address

From

Address

Memo

SEE REVERSE WARNING • NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS

⑆000008002⑆ 50715921835⑈

POSTAL M.O. VOUCHER–PLEASE RETURN TO YOUR POST OFFICE IF FOUND

50715921835 170202 083260 ***1*00

Do not mark or write in the area between the lines

– IS THE DATE ON THE IMPRINTER CORRECTLY SET?

NOT NEGOTIABLE

CUSTOMER'S RECEIPT

DO NOT SEND THIS RECEIPT FOR PAYMENT KEEP IT FOR YOUR RECORDS

Serial Number	Year, Month, Day	Post Office	U.S. Dollars and Cents
50715921835	170202	083260	***1*00

Pay to

Address

Memo

UNITED STATES POSTAL SERVICE

U.S. MAIL

From

Address

This receipt is your guarantee for a refund of your money order if it is lost or stolen, provided you fill in the *Pay To* and *From* information on the money order in the space provided. No claim for improper payment permitted 2 years after payment. If your money order is lost or stolen, present this receipt and file a claim for a refund at your Post Office.

An inquiry Form 6401 may be filed at any time for a fee. A replacement will not be issued until 60 days after the money order purchase date, provided the money order has not been paid.