

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Middle District of Florida

United States of America
v.
Jordan Tyler Jax
Tarod Goodman, Jr.

Case No.
5:23-mj-1017-PRL

Defendant(s)

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 January 24, 2023 in the county of Marion in the
Middle District of Florida, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 1708 (Mail Theft) and 18 U.S.C. § 1704 (Possession of Stolen/Reproduced Postal Key).

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.



Printed name and title

Arrested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: January 25, 2023

Handwritten signature of Philip R. Lammens

Judge's signature

City and state: Ocala, Florida

Philip R. Lammens, U.S. Magistrate Judge

Printed name and title

STATE OF FLORIDA

MARION COUNTY

Case No. 5:23-mj-1017-PRL

**AFFIDAVIT IN SUPPORT OF
THE ISSUANCE OF A CRIMINAL COMPLAINT**

I, [REDACTED], being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector (Postal Inspector) with the United States Postal Inspection Service (USPIS) and have been so employed since June 2003. I am currently assigned to the Miscellaneous Team in Orlando, Florida. Prior to June 2003, I served as a Special Agent with the Florida Department of Law Enforcement in Miami, Florida from 2001 to 2003. I have also served as a police officer with the City of Tallahassee Police Department in Tallahassee, Florida from 1996 to 2001. I have received specialized training in numerous postal crimes, but primarily those involving mail and identity fraud related offenses. I have attended training in the areas of mail fraud, mail theft, access device fraud, and various types of identity takeover schemes, and I have investigated numerous cases involving these types of offenses. I am authorized to obtain and execute arrest and search warrants.

2. The information set forth in this affidavit is based on my investigation, information supplied to me by other law enforcement officers and agents, and information contained within various government databases and records. Because this affidavit is submitted for the limited purpose of establishing probable cause to support

the issuance of a criminal complaint, I have not included details of all aspects of my investigation. Rather, I have set forth only those facts I believe necessary to establish probable cause that a violation of federal law has been committed.

3. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1708 (Mail Theft) and 18 U.S.C. § 1704 (Possession of Stolen/Reproduced Postal Key(s)) have been committed.

JURISDICTION

4. This Court has jurisdiction to issue the requested warrant because it is a “court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A). Specifically, the Court is “a district court of the United States ... that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

5. On Friday December 9, 2022, Marion County Sheriff’s Office (MCSO) Detective Ian Simpson contacted me concerning an ongoing mail theft issue in Ocala, Florida. Per Simpson, the following information was obtained: Beginning in September 2022, MCSO was receiving reports from multiple victims who had reported mailing their checks from the same two location(s) that did not reach the intended recipient(s). The checks were later altered and/or counterfeited to be made payable to different names. The locations of the mailings were 8075 SW Highway 200, Ocala, FL 34481 (herein referred to as Canopy Oaks Center) and 8441 SW Highway 200

Ocala, Fl 34481 (herein referred to as Friendship Center). Both locations are within the Middle District of Florida. They are business plazas that are within a close distance to each other. Each of these business plazas have a marked blue USPS Collection Box. The victims reported placing the mail inside the USPS Collection Box located on/at either site. Simpson provided several case reports that indicated the following:

6. Reporting person C.W. works for an accounting office in Ocala, Florida. He reported that on or about September 30, 2022, a staff member had mailed out letters containing business checks to pay subcontractors. The mail was placed in the USPS Collection Box located at Friendship Center. Approximately 13 checks were later altered/counterfeited and uttered in different names. The amount of potential fraud loss attributed to this case is approximately \$188,350.

7. On November 4, 2022, victim M.G. reported that she had mailed several business checks between October 21 to October 29, 2022. The checks were mailed from the USPS Collection Box located at the Canopy Oaks Center. One of her vendors complained on the non-receipt of the check. M.G. then reported that the two checks were altered to different names in the amount of \$7,627.75 and \$17,985.62.

8. On November 18, 2022, victim J.L. reported that on or about October 28, 2022, she had mailed out business checks from the Collection Box located at the Canopy Oaks Center. She later received a notification from her bank that she had a low balance. She discovered that the two checks she had mailed had been altered to different names in the amount of \$19,500 and \$5,000.

9. Marion County Sheriff Detectives Simpson and Richard Mead were able to obtain video from the Publix Shopping Center located at the Canopy Oaks Center. One of the Publix video cameras is pointed in the direction of the USPS Collection Box. On October 21, 2022, at 10:33 PM, a blue Dodge Charger vehicle is captured on surveillance video at the Canopy Oaks Center parking near the USPS Collection Box. This is not a USPS vehicle. An unknown subject (UNSUB) wearing dark clothing is seen opening the Collection Box with a key and taking out the plastic postal bin that holds the US Mail. He is seen placing the U.S. Mail into the vehicle. He then returns the USPS postal bin back into the USPS Collection Box and closes the door.





10. The same blue Dodge Charger vehicle is captured on video on November 4, 2022, November 13, 2022, November 27, 2022, December 2, 2022, January 10, January 13, and January 18 stopping at the collection box and an occupant is observed opening the collection box to steal the U.S. Mail.

11. In addition, within the Friendship Center is a Contract Postal Unit, which is a store that contracts with the USPS to provide mail services. The business has a surveillance camera that points directly outside where the USPS Collection Box is located. On December 8, 2022, at approximately 2:07 AM, the video surveillance captured a white Dodge Charger pulling up to the USPS Collection Box. The passenger is seen getting out of the vehicle and kneeling at the Collection Box. The UNSUB is seen placing the postal bin in the back seat and dumping out the U.S. Mail.

The UNSUB then places the postal bin back in the USPS Collection Box and sits in the front passenger seat. The vehicle is seen leaving the area.



12. On December 2, 2022, at approximately 1:21 AM, there is store video of the Blue Charger vehicle stopping in front of the USPS Collection Box. The driver side door opens and the unknown subject, wearing a full-face ski mask, and wearing a dark colored hooded garment, light colored pants, and light-colored sneakers gets out and successfully opens the USPS Collection Box with a key. The subject steals the mail piece(s) and enters the vehicle then leaves the area.



13. In addition, MCSO Detectives were provided information that on the same night of December 2, 2022, at approximately 2:01 AM, MCSO deputies responded to a call for service at the Friendship Center concerning a suspicious vehicle that was driving behind the plaza. MCSO deputies spotted a blue Dodge Charger (Florida Tag IMQ-V42) parked behind the Friendship Center. Deputies made contact with driver JORDAN JAX and passenger TAROD GOODMAN, JR. who were inside the vehicle. The subjects advised the deputies they were just talking. The deputies interviewed and released the subjects.

14. I reviewed the body camera video associated with the above incident. I observed that the driver, JORDAN JAX, was using what appeared to be a black ski mask as a head scarf.



15. Florida tag IMQ-V42 is registered to JORDAN JAX of Newberry, Florida. It is assigned to a 2020 Dodge Charger.

16. A check on the vehicle identified two active criminal cases with Gainesville (FL) Police Department dating back to February 16 and May 16, 2022, where the vehicle tag IMQ-V42 was identified in an ATM deposit of counterfeit checks into different account(s) at Radiant Credit Union in Gainesville, Florida.

17. In addition, a check on TAROD GOODMAN, JR. shows that he has a white Dodge Charger (Florida Tag 71B-QQP).

18. On December 9, 2022, I met with MCSO detectives at the Friendship Center. I received permission from the Property Manager, M.S., to place surveillance cameras in and around the Collection Box to identify the target(s) vehicle(s). On the

same date, an LPR (License Plate Reader) camera was set up at the scene in order to capture the license plate of the vehicle involved in the mail theft.

19. On December 15, 2022, Detective Mead checked the video surveillance and observed that on that day at 1:47 AM, a white Dodge Charger had stopped in front of the Collection Box located at the Canopy Oaks Center. The passenger of the vehicle opened the collection box and stole the mail. At approximately 2:15 AM, the same vehicle is seen on the CPU surveillance camera at the Friendship Center, though no one opened the collection box.

20. Detective Mead then checked the images on the LPR Camera. He identified the Florida tag as 71B-QQP. The vehicle is registered to TAROD GOODMAN, JR., of Gainesville.

21. On December 20, 2022, I checked the hidden surveillance camera placed near the USPS Collection Box located at the Friendship Center. The images captured a male subject wearing a light-colored hooded sweater, full black ski mask, light colored shorts, and white sneakers opening the collection box with a key and removing the plastic postal bin containing outgoing mail. The mail is then placed in the backseat area of the Dodge Charger. The subject returns the postal bin and secures the USPS Collection Box. As the subject leaves the vehicle tag is observed as IMQ-V42.



22. As mentioned prior, Florida tag IMQ-V42 is registered to JORDAN JAX of Newberry, Florida. It is assigned to a 2020 Dodge Charger.

23. I viewed several surveillance videos of the mail theft involving the opening of the USPS Collection Box. It is apparent that the subject(s) have a postal key commonly referred to as an "Arrow Key."

24. The Arrow Key is an accountable property assigned to post office(s) that is used only by USPS employee(s) in an official capacity. The Arrow Key is able to open any/all mail receptacles within a geographic area. It is a federal violation under 18 U.S.C. § 1704 to possess an Arrow Key.

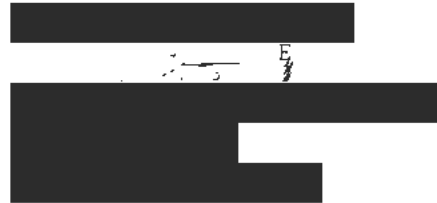
25. On January 25, 2023, Marion County Sheriff's Deputies and U.S. Postal Inspection Service conducted surveillance on JORDAN JAX's blue Dodge Charger. In addition, MCSO Aviation Unit also conducted aerial surveillance on the vehicle. At approximately 11:01 PM, JORDAN JAX's Blue Dodge Charger was observed driving to the Maricamp Post Office located at 6530 SE Maricamp Rd, Ocala, FL 34472. The driver was observed going to the back of the USPS Collection Box located in the parking lot and opening the back door. The subject then took out the postal bin containing the U.S. Mail and placed it in the backseat of the Dodge Charger. The Dodge Charger then left the area.

26. At approximately 11:16 PM, the blue Dodge Charger was observed at the Publix Shopping Center located at 7578 SE Maricamp Road, Ocala, FL 34472. On the premise is a blue USPS Collection Box. The driver was observed opening the collection box, removing the mail and placing it in the backseat of the of the car.

27. At approximately 11:21 PM, law enforcement conducted a traffic stop on the blue Dodge Charger. The driver was identified as JORDAN JAX and the front

seat passenger was identified as TAROD GOODMAN, JR. Both subjects were arrested for Mail Theft. Inside the backseat of the vehicle was stolen U.S. Mail that had been rifled. In addition, a USPS Arrow Key was also located in the backseat of the vehicle.

This concludes my affidavit.



Affidavit submitted by email and attested to me as true and accurate via telephone or video conference, consistent with Fed. R. Crim. P. 4.1 and 41(d)(3), before me this 25th day of January 2023.

A handwritten signature in blue ink that reads "P Lammens".

The Honorable Philip R. Lammens
United States Magistrate Judge