



AMENDED STATEMENT OF FACTS




Beginning in December 2023, multiple federal and local law enforcement agencies, including the United States Postal Inspection Service (USPIS), the Metropolitan Police Department of the District of Columbia (MPD), and the Arlington County Police Department (ACPD), began investigating multiple high-volume mail thefts from United States postal mailboxes at multi-family luxury residences and the potentially related robberies of postal letter carriers and other unsuspecting victims in the Washington, D.C. metropolitan area.



As described in greater detail below, Ibrahim Emmanuel DE LA CRUZ, DOB 2/12/1999 perpetrated a large number of high-volume mail thefts in the Washington, D.C. metropolitan area, using stolen U.S. Postal Service “Arrow keys,” or keys to “Arrow locks,” or “Modified Arrow Locks,” which are locks with standard dimensions used by the U.S. Postal Service for mail carriers to access collection boxes, outdoor parcel lockers, cluster box units, and apartment mailbox panels. In addition, DE LA CRUZ, robbed a postal maintenance worker of his Arrow keys on August 10, 2024 while gripping what appeared to be a pistol tucked into his waistband. Specifically, as outlined below, DE LA CRUZ closely resembles the individual captured on video committing a string of these thefts and is connected to the thefts in multiple ways, as well as the armed robbery, including through cell site evidence, his connection to various clothing, vehicle, and accessories used or worn during the offenses, his connection to fraud-efforts using what appears to be stolen mail, and Instagram posts tying himself to the crimes, as shown below.



Specifically, as outlined below, DE LA CRUZ closely resembles the individual captured on video committing a string of these thefts and is connected to the thefts in multiple ways, as shown below.



| Theft / Date Time | Evidence Summary Linking to De La Cruz and Mail Theft |
|-----------------------------|---|
| December 6, 2023 at 6:07 PM | <ul style="list-style-type: none">At 900 Army Navy Drive, Arlington, VA 22202 a victim observed a heavier set, Hispanic male approximately 5’7” wearing a face mask who robbed the victim mail carrier of arrow key.Surveillance footage depicts an individual wearing a dark colored mask, dark colored hooded jacket, jeans, and black shoes. The individual is heavy set. On the left sleeve of the jacket is a symbol that appears to be consistent with a Canada Goose logo. (In addition to similarities in appearance, DE LA CRUZ is linked to a similar jacket.) |



| Theft / Date Time | Evidence Summary Linking to De La Cruz and Mail Thefts |
|--|--|
| |  |
| <p>February 19, 2024 at 12:13 AM</p> | <ul style="list-style-type: none"> At 2337 Champlain Street, NW, Washington, DC 20009 an individual observed as a heavy-set light skinned black or Hispanic male wearing glasses, a gray hood, a black Canada Goose jacket, dark sweatpants, and black sneakers with red and white trims, utilized one of the Arrow keys to steal mail with two other individuals. (In addition to similarities in appearance, DE LA CRUZ is linked to a similar jacket.)  |
| <p>February 19, 2024 at 3:13 AM</p> | <ul style="list-style-type: none"> At 2301 Champlain Street, NW, Washington, DC 20009 a heavy-set light-skinned black or Hispanic male wearing glasses, a gray hood with an apparent large afro protruding from the hood, a black Canada Goose jacket, black sweatpants, and black sneakers with red and white trims, entered the residence and picked up and walked away with mail matter located inside of a translucent white box labeled “United States Postal Service.” (In addition to similarities in appearance, DE LA CRUZ is linked to a similar jacket.) |

| Theft / Date Time | Evidence Summary Linking to De La Cruz and Mail Thefts |
|--------------------------------------|--|
| |  |
| <p>February 29, 2024 at 12:20 AM</p> | <ul style="list-style-type: none"> At 1630 R Street, NW, Washington, DC 20009 a heavy-set light-skinned black or Hispanic male, with a large afro, wearing a dark Canada Goose-style coat, glasses, dark covid mask, dark sweatpants, and black gym shows, entered into the mail area and appeared to use an Arrow key to open several different collection box units at the location. (In addition to similarities in appearance, DE LA CRUZ is linked to a similar jacket.)  |
| <p>March 1, 2024 at 12:15 AM</p> | <ul style="list-style-type: none"> At 1401 R Street, NW, Washington, DC, 20009, a young, black, juvenile male (“Co-conspirator 1”) let two unknown males into 1401 R Street, NW by opening the front door for them. After reviewing the surveillance footage, the second individual was observed as a heavy-set light skinned black or Hispanic male, with a large afro, wearing black and white tennis shoes, dark sweatpants, glasses, and a dark Canada Goose-style coat. (In addition to similarities in appearance, DE LA CRUZ is linked to a similar jacket.)  |
| <p>March 3, 2024 at 2:23 PM</p> | <ul style="list-style-type: none"> At 2200 17th Street, NW, Washington, DC, 20009 two males entered the outdoor locked mail area with a stolen |

| Theft / Date Time | Evidence Summary Linking to De La Cruz and Mail Thefts |
|--|---|
| | <p>Arrow key. The first male, was a heavy-set light skinned black or Hispanic male, with a large afro, glasses, black sweat pants, black t-shirt, and with a black and white hoodie wrapped around his neck.</p>  |
| <p>March 4, 2024 at 11:53 PM</p> | <ul style="list-style-type: none"> At 2419 Ontario Road, NW, Washington, DC, 20009 surveillance footage shows an individual with a hooded sweatshirt with the graphic image of a spider web on the front and sleeves, glasses, sweatpants, and a mask – entered both collection mailboxes with an Arrow key. (In addition to similarities in appearance, DE LA CRUZ is linked to a similar spider web hoodie and a white car similar to the one used in the theft. He also posted about this theft on his Instagram account.)  |
| <p>March 5, 2024 at approximately 12:26 AM</p> | <ul style="list-style-type: none"> At 2138 California Avenue, NW, Washington, DC 20008 surveillance video captured a heavy-set light-skinned male with an apparent protruding afro wearing a black and white hooded sweatshirt with the graphic image of a spider web on the front and sleeves, glasses, and dark sweatpants entering into the building from which mail was stolen. In addition to |

| Theft / Date Time | Evidence Summary Linking to De La Cruz and Mail Thefts |
|--|--|
| | <p>similarities in appearance, DE LA CRUZ is linked to a similar spider web hoodie</p>  |
| <p>March 5, 2024 at approximately 1:49 AM</p> | <ul style="list-style-type: none"> At the National Landing in Arlington located at 1201 S. Joyce Street, Arlington, Virginia surveillance footage captured a heavy-set light-skinned male with an apparent protruding afro, wearing glasses, a black hooded sweatshirt with a white brand name “Sp5der” on the chest and a graphic image of a spider web on the front and sleeves, black sweatpants and a black mask entering a location from which mail was stolen. . (In addition to similarities in appearance, DE LA CRUZ is linked to a similar spider web hoodie.)  |
| <p>March 21, 2024 at approximately 3:42 AM</p> | <ul style="list-style-type: none"> At the 1500 block of Pointer Ridge Place in Bowie, Maryland video surveillance captures a heavy-set light-skinned male wearing glasses, a puffy black jacket, a black beanie with white or gray graphic images, and dark sweatpants, exiting a |

| Theft / Date Time | Evidence Summary Linking to De La Cruz and Mail Thefts |
|----------------------------|---|
| | <p>small jeep and opening a cluster mailbox and removing mail from inside of the mailboxes using a key. . (In addition to similarities in appearance, DE LA CRUZ is linked to a similar jacket.)</p>  |
| August 10, 2024 at 5:15 AM | <ul style="list-style-type: none"> At 713 Parkside Place, NE, Washington, DC, video surveillance captures a heavy-set light-skinned male wearing glasses, a black jacket, and dark pants, exiting a burgundy foreign luxury SUV / hatchback. (In addition to similarities in appearance, DE LA CRUZ is linked to a similar watch, to a car similar to the one used, and to the area by cellsite location data.)  |

| Theft / Date Time | Evidence Summary Linking to De La Cruz and Mail Thefts |
|----------------------------|--|
| |  |
| August 10, 2024 at 6:20 AM | <ul style="list-style-type: none"> At 901 New Jersey Avenue, NW, Washington, DC, video surveillance captures a robbery of postal maintenance worker by a suspect driving burgundy foreign luxury SUV / hatchback. (In addition to similarities in appearance, DE LA CRUZ is linked to a similar mask as the one worn, a car similar to the one used, to the area by cellsite location data.)  |

DE LA CRUZ is also suspected of fraudulently using the personal identifying information of others, much of which is gleaned from some this stolen mail, to obtain money and property by, for example, seeking to open or access bank accounts to steal money, and activating credit cards in the names of others and using them for his own personal benefit. Video surveillance has captured DE LA CRUZ fraudulently using credit cards at McDonalds, Panda Express, and a NIKE store. Law enforcement has also recovered a picture of a fake driver's license with a picture of an individual matching that of DE LA CRUZ, that was superimposed on the image of a victim. The fake license was used in a membership application to the Arlington Federal Credit Union (ACFCU) to open an account. The account was used in an attempt to transfer \$56,000 from a victim's bank account. Furthermore, an accounting of unauthorized transactions from the same victim's Bank of America checking account totaled approximately \$29,000. The transactions included several payments made toward rent, utilities, tuition, and cell phone bills directly benefitting DE LA CRUZ, his family, or known individuals who have represented they are in or were in romantic relationships with DE LA CRUZ.

On February 13, 2024 Ibrahim DE LA CRUZ was stopped by Officer Brock Brooks in the 2000 block of 14th Street, NW, Washington, D.C. while operating a white Mercedes bearing a Maryland paper tag T1668576 (CCN 24034571). **(Figure 1).**



Figure 1

During the stop DE LA CRUZ can be seen wearing distinctive glasses and a watch on his left arm. **(Figure 2a).** DE LA CRUZ can be seen wearing these same glasses and watch in surveillance footage in subsequent mail thefts that are referenced below.



Figure 2a

On March 11, 2024, law enforcement officers spoke with representatives of a business called GSM Luxe located in Tyson's Corner, Virginia. GSM Luxe rents out luxury vehicles, in the same way that VRBO and Air BNB rent houses. GSM Luxe rents out other people's luxury vehicles, to people who want to rent luxury vehicles. According to the representatives of GSM Luxe, De LA CRUZ rented a white 2021 Mercedes Benz AMG GLE 53 SUV twice from GSM Luxe, from approximately February 7, 2024 through February 20, 2024, and again from February 24, 2024 through March 6, 2024. A white Mercedes Benz GLE SUV was involved in a mail theft on March 4, 2024 at 2419 Ontario Road, NW.

Law enforcement has identified DE LA CRUZ's Instagram account as a1.blackmigo Instagram ID 232632883 through his prominent presence in the posts and "stories" of the account. An Instagram "Story" was posted on February 14, 2024 upon which an individual resembling DE LA CRUZ is prominently featured in its posts and "Stories." The "Story" shows an individual resembling DE LA CRUZ standing in front a White Mercedes Benz GLE53 SUV bearing Maryland paper tag T1668576 where he is wearing a Canada Goose jacket with a patch on the left sleeve. A screenshot of the "Story" is provided below (**Figure 2b**). DE LA CRUZ is standing in front of the same white Mercedes from the traffic stop from February 13, 2024 and is wearing the same distinctive watch. As detailed below, surveillance footage has captured DE LA CRUZ wearing the similar law Canda Goose jacket with a patch on the left sleeve in multiple mail thefts. (In addition, on March 5, 2024 DE LA CRUZ sent a news link from this Instagram account with a laughing emoji of a mail theft where he looked into the camera and stated "I love you daddy," which is what the thief did in the March 4, 2024 mail theft.)



Figure 2b

Mail Theft and Letter Carrier Robberies

On December 6, 2023, at approximately 6:07 p.m., at or near the residential apartment complex utilizing the addresses of 900 Army Navy Drive, Arlington, VA 22202 and 1201 South Joyce Street, Arlington, VA 22202 (“National Landing”), as later described by the victim postal carrier, a heavier set, Hispanic male approximately 5’7” wearing a face mask confronted a postal letter carrier at his delivery truck and stated, “Give me your Arrow key before I blow your head off!” The suspect then reached to the letter carrier’s hip and ripped off the arrow key from the letter carrier’s uniform. The suspect then entered and fled in what the witness described as a dark colored sedan, possibly a BMW. The suspect was captured on surveillance footage prior to the robbery and can be seen wearing a black Canada Goose jacket with a patch on the left sleeve. (Figures 3a & 3b).



Figure 3a



Figure 3b

Arrow keys,” or keys to “Arrow locks,” or “Master Access Locks,” which are locks with standard dimensions used by the U.S. Postal Service for mail carriers to access collection boxes, outdoor parcel lockers, cluster box units, and apartment mailbox panels. On May 22, 2024, postal inspectors presented a photo lineup to the victim that included a picture of DE LA CRUZ. The victim stated that he was unsure if any of the individuals in the photo line-up were the suspect and did not identify DE LA CRUZ.

February 19, 2024 Mail Theft Incidents

On February 19th, 2024, at approximately 12:13 AM, three males entered the condominium building located at 2337 Champlain Street, NW, Washington, DC 20009 and accessed the mailboxes there by using at least two Arrow Keys. The incident was captured on surveillance video. One of the individuals, was observed as a heavy-set light skinned black or Hispanic male wearing glasses, a gray hood, a black Canada Goose jacket, dark sweatpants, and black sneakers

with red and white trims utilize one of the arrow keys. The individual's appearance is consistent with that of DE LA CRUZ. As depicted in **Figure 4** and **5**, the individual is wearing the same Canada Goose jacket with the patch on the left sleeve and similar glasses as depicted in **Figures 2-3**.



Figure 4



Figure 5a

Approximately three hours later, on February 19, 2024, at approximately 3:13 AM, at 2301 Champlain Street, NW, Washington, DC 20009 a heavy-set light-skinned black or Hispanic male wearing glasses, a gray hood with an apparent large afro protruding from the hood, a black Canada Goose jacket, black sweatpants, and black sneakers with red and white trims, entered the residence and picked up and walked away with mail matter located inside of a translucent white box labeled “United States Postal Service.” Surveillance video captured the incident, and this is a still photograph from the footage (**Figure 5b**):



Figure 5b

February 24, 2024 Traffic Stop

On February 24, 2024, DE LA CRUZ was stopped by Officer Eddie Choi at the 1400 block of Clifton Street, NW (CCN 24029043). DE LA CRUZ was driving the same white Mercedes, Maryland tag, T1668576 that he was driving on February 13, 2024. **(Figure 6)**. DE LA CRUZ provided his driver's license with a photo taken from his cell phone and when Officer Choi asked how to pronounce his first name he stated "Ibrahim." DE LA CRUZ was asked to step out of the vehicle but he put the car in drive, drove onto the sidewalk and fled down 14th street at a high rate of speed and was not apprehended.

During the stop, DE LA CRUZ can be seen wearing a sweatshirt with an image of a spider web that can be seen on surveillance footage in subsequent mail theft robberies that occurred on March 4, 2024 and March 5, 2024. **(Figure 6)**. He was also wearing the same black Canada Goose jacket with a patch on the left sleeve that he was wearing in **Figure 5a**, the February 19, 2024 mail theft. **(Figure 7)**.



Figure 6

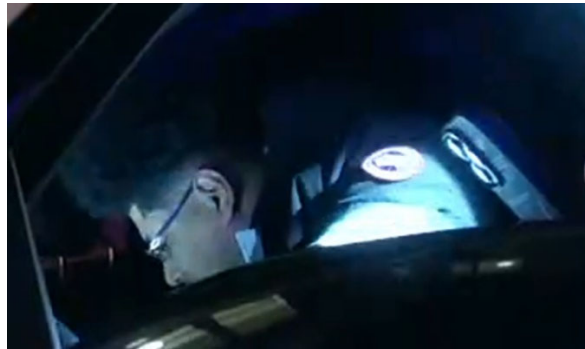


Figure 7a

February 29, 2024 Mail Theft Incident

A few days later, on February 29, 2024 at approximately 12:20 AM, at 1630 R Street, NW, Washington, DC 20009, a heavy-set light-skinned black or Hispanic male, with a large afro, wearing a dark Canada Goose-style coat, glasses, dark covid mask, dark sweatpants, and black gym shoes, entered into the mail area of 1630 R Street, NW and appeared to use an Arrow key to open several different collection box units at the location. The stolen Arrow key appeared to be attached to a green keychain. The incident was also captured on surveillance video, and below are several still photographs from the footage (**Figures 7b and 7c**).



Figure 7b



Figure 7c

In addition to his consistent overall appearance, DE LA CRUZ can be seen wearing the same Canada Goose-style coat with the patch on the left sleeve and can be seen wearing the similar style glasses. **(Figure 7a).**

March 1, 2024 Mail Theft Incident

The next day, on March 1, 2024, at 1401 R Street, NW, Washington, DC, 20009, at approximately 12:15 AM, a young, black, juvenile male (“Co-conspirator 1”) let two unknown males into 1401 R Street, NW by opening the front door for them. The incident was captured on surveillance video, which shows Co-conspirator 1, who lived in the building, wearing a black t-shirt and striped black and white shorts. The first unknown male to walk in was wearing multicolored gym shoes, black sweatpants, a lighter shade covid mask, and dark colored coat. After reviewing the surveillance footage, the second individual was observed as a heavy-set light skinned black or Hispanic male, with a large afro, wearing black and white tennis shoes, dark sweatpants, glasses, and a dark Canada Goose-style coat. Your affiant has reviewed the footage and the second individual bears a strong resemblance to DE LA CRUZ. Both men used stolen Arrow keys to open the collection boxes at the location, then placed all the stolen mail and parcels into a yellow parcel bag and exited the location. Still photographs from the surveillance video **(Figures 8a-8e)** are below:



Figure 8a



Figure 8b



Figure 8c

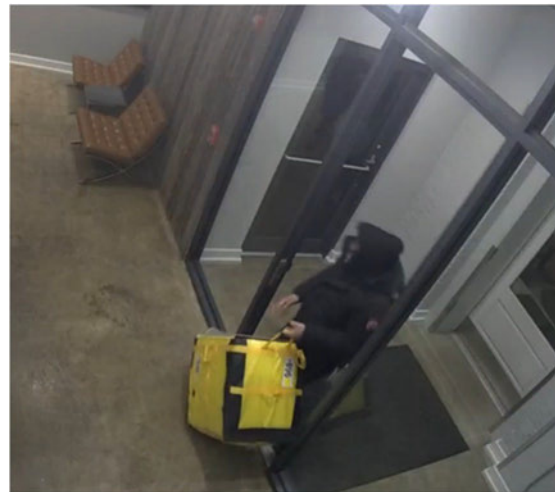


Figure 8d



Figure 8e

DE LA CRUZ can be seen wearing the same Canada Goose-style coat with the patch on the left sleeve and can be seen wearing the similar style glasses. **(Figure 8f).**



Figure 8f

March 3, 2024 Mail Theft Incident

Two days later, on March 3, 2024, another mail theft attack occurred at 2200 17th Street, NW, Washington, DC, 20009. As captured on video surveillance, at approximately 2:23 PM, two males entered the outdoor locked mail area with a stolen Arrow key. The first male was a heavy-set light skinned black or Hispanic male, with a large afro, glasses, black sweat pants, black t-shirt, and with a black and white hoodie wrapped around his neck. The second male was wearing white gym shoes, gray sweatpants, a black NIKE shirt, and a black and white Moncler jacket. The two males used a stolen USPS Arrow key to enter the collection box at the location and steal various mail pieces. The first male can be seen entering several parcels and First Class mail pieces and handing one particular First Class Mail piece to the male in the jacket. The male in the jacket opens an Amazon parcel and takes the contents, and they both leave the location with several pieces of mail. The first male can be seen using his cell phone during this mail theft. Your affiant has reviewed the footage and the first individual bears a strong resemblance to DE LA CRUZ. Screenshots of the surveillance footage (**Figures 9a-9e**) from the location are provided below:



Figure 9a



Figure 9b



Figure 9c



Figure 9d



Figure 9e

Less than half an hour later, on March 3, 2024, at approximately 2:52 PM, a concerned citizen reported to law enforcement that they had witnessed a white Mercedes Benz GLE SUV at the corner of Connecticut Avenue, NW and Calvert Avenue, NW, Washington, DC, 20008 throwing mail from the passenger side window into a public trash can and the area around the trash can. (The witness took a video of the vehicle.) This mail was recovered and was identified as having been stolen from 1910 Kalorama Street, NW, which is less than half a mile away from 2200 17th Street NW, Washington, DC, 20009, which was the location of the previously reported theft above. Photographs of the trash can and recovered mail are below (**Figures 9f-9g**):

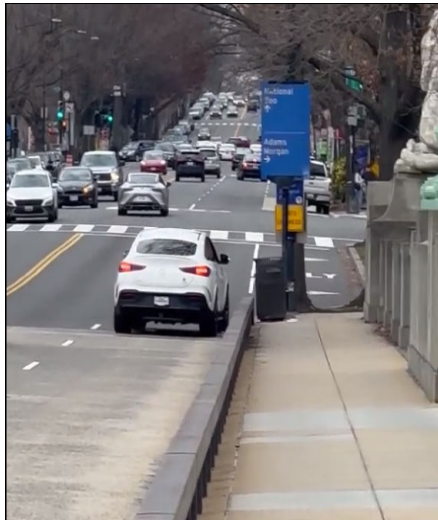


Figure 9f (Mercedes Benz)



Figure 9g

March 4, 2024 Mail Theft Incident

The next day, on March 4, 2024, at approximately 11:53 PM, two men dressed in black sweatpants approached 2419 Ontario Road, NW, Washington, DC, 20009. The collection mailboxes at this location are not behind any kind of gate. There are collection mailboxes on both sides of the main door entryway into 2419 Ontario Road, NW. As captured on video, a heavy-set male with an apparent large afro wearing a black hooded sweatshirt with the graphic image of a spider web on the front and sleeves, glasses, sweatpants, and a mask, entered both collection mailboxes with an Arrow key. The other male, dressed in dark clothes, then began to steal mail and parcels together with the primary suspect from both collection mailbox units. Meanwhile, surveillance video footage showed other unknown members waiting near a White Mercedes Benz SUV (similar to the vehicle in **Figure 1**), with the front passenger-side door open. Eventually, four suspects appear to steal mail from 2419 Ontario Road, NW. Still photographs from available surveillance footage (**Figure 10a – 10e**) of the incident are below – with circles or arrows added around key details.¹ In the Ring Camera in **Figure 10e**, an individual bearing a strong resemblance to

¹ Due to the night vision feature of the type of camera that recorded some of this footage, black objects look gray in some of the photographs.

DE LA CRUZ looked into the camera and stated “I love you daddy”. (NOTE: As discussed above, on March 5, 2024 DE LA CRUZ sent a news link via his Instagram account with a laughing emoji of a mail theft where he looked into the camera and stated “I love you daddy.”)



Figure 10a



Figure 10b



Figure 10c



Figure 10d



Figure 10e

Surveillance footage then shows the four individuals entering a white vehicle that is similar in appearance to the white Mercedes that DE LA CRUZ was driving on February 13, 2024 and February 24, 2024. Furthermore, the sweatshirt depicted in **Figure 10d** is similar in appearance to the spider web sweatshirt DE LA CRUZ was wearing in his February 24, 2024 traffic stop.



Figure 10f

March 5, 2024 Mail Theft Incident

On March 5, 2024, at approximately 12:26 AM, surveillance video captured a heavy-set light skinned male with an apparent protruding afro wearing a black and white hooded sweatshirt with the graphic image of a spider web on the front and sleeves, glasses, and dark sweatpants,

along with another male, entering 2138 California Avenue, NW, Washington, DC 20008. Property management at the location confirmed that mail was stolen from the location and mailboxes were left open, but could only provide entry video footage, a screenshot of which is provided below. Your affiant has reviewed the footage and the individual wearing the spiderweb pattern is consistent in appearance with DE LA CRUZ, who was wearing such a sweatshirt during his February 24, 2024 traffic stop. **(Figure 11).**



Figure 11

Approximately one hour later on March 5, 2024 at approximately at approximately 1:49 AM, five unknown suspects dressed in all black entered the package room at National Landing in Arlington, Virginia, at 1201 South Joyce Street, Arlington, VA 22202, which is part of the same National Landing apartment homes as 900 Army Navy Drive, VA 22202. The five suspects at 1201 South Joyce Street opened various packages, and left with mail and package matter. Based on available camera footage, one of the individuals, matches the description DE LA CRUZ, a heavy-set light skinned male with an apparent protruding afro, wearing glasses, a black hooded sweatshirt with a white brand name “Sp5der” on the chest and a graphic image of a spider web on the front and sleeves, black sweatpants and a black mask. (DE LA CRUZ, who was wearing such a sweatshirt during his February 24, 2024 traffic stop.) A screenshot of the surveillance footage of the incident is provided below. **(Figure 12a & 12b).**



Figure 12a



Figure 12b

March 21, 2024 Mail Theft Incident And Use of GSA Card

On March 21, 2024, at approximately 3:52 AM, video surveillance captures a heavy-set light-skinned male wearing glasses, a puffy black jacket, a black beanie with white or gray graphic images, and dark sweatpants, exiting a small silver JEEP SUV and opening a cluster mailbox located at 1500 block of Pointer Ridge Place and removing mail from inside of the mailboxes using a key. (Initial records received from the rental company, link DE LA CRUZ to a similar jeep around this time frame.) This incident was also captured on surveillance video (**Figure 13**), and below is a still photograph from that footage of the suspect:

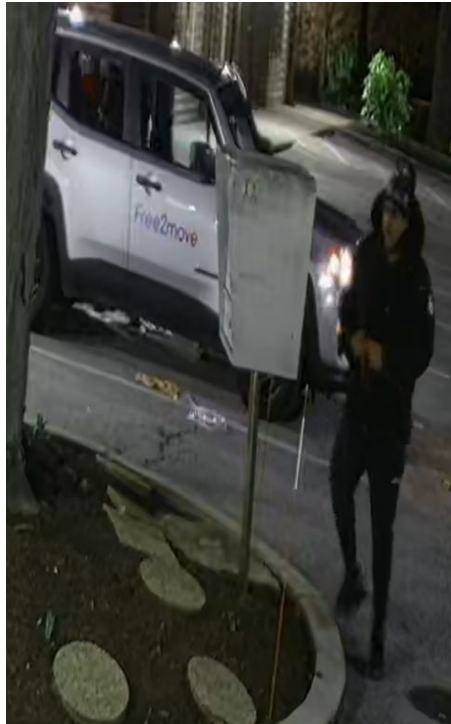


Figure 13

On March 27, 2024, an individual (“Victim 1”) living in the South Lake Townhomes community in Bowie, Maryland informed law enforcement that Victim 1 was expecting a GSA credit card in the mail around March 21, 2024, the day a mail theft occurred in the community. South Lake Townhomes is approximately 1.5 miles south of the 1500 block of Pointer Ridge Place where the above mail theft took place. There is no surveillance footage from South Lake Townhomes. Victim 1 was notified by GSA that Victim 1’s credit card was activated on March 21, 2024 and that two transactions were made at a McDonald’s in Washington, DC. Security camera footage from the McDonald’s shows an individual matching the description of DE LA CRUZ, driving a similar silver jeep as the one used in the mail theft above utilizing the drive-thru purchasing food with a credit card on at least one occasion in the same amount reported on Victim 1’s credit card less than three hours after the mail theft above. Below is a still photograph (**Figure 14**) from the surveillance footage from the McDonald’s:



Figure 14

Fraud of Mail Theft Victims

On April 22, 2024, a victim of the mail theft at National Landing in Arlington, Virginia located at 1201 South Joyce Street, Arlington, VA 22202 (“Victim 2”) on March 5, 2024 informed law enforcement that two of Victim 2’s credit cards, which Victim 2 expected but never received in the mail, were used at various merchants, including Panda Express in Virginia, following the mail theft. In one particular transaction, law enforcement officers observed security camera footage (**Figures 15-16**) of an individual matching the description of DE LA CRUZ making a credit card purchase at the aforementioned Panda Express and in the amount listed on Victim 2’s credit card statement. The pictured individual is wearing a black shirt the graphic image of a spider web on the front that is similar to the clothing worn by the suspected mail thief at 2419 Ontario Street, NW and 2138 California Ave, NW in Washington, DC and National Landing at South Joyce Street in Arlington, Virginia. Screenshots of the Panda Express camera footage are provided below.



Figure 15

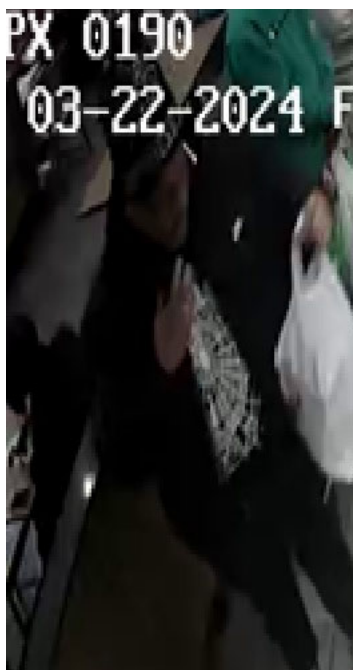


Figure 16

On May 2, 2024, an individual living at 2337 Champlain Street NW, Washington, DC 2009 (“Victim 3”), informed law enforcement that at various times leading up to the reported mail theft at the condominium building on February 19, 2024, several residents, including Victim 3, discovered mail was missing from their mailboxes. Victim 3 received a letter from Discover on January 20, 2024, for a suspected fraudulent application for a deposit account. Similarly, in a letter dated January 26, 2024, Victim 3 learned from Capital One that an application for a credit card was made in Victim 3’s name, which Victim 3 did not authorize. The telephone number used to apply for the Capital One credit card was used on at least six other occasions between January 13, 2024 to February 4, 2024 to apply for credit cards in the names of unrelated individuals whose addresses spanned five different states including New Jersey, Illinois, California, Massachusetts, and New York.

On May 4, 2024, an individual living at 1450 Church Street, NW (“Victim 4”) reported that a Bank of America credit card Victim 4 was expecting in the mail around the time of the mail thefts at her residence was used several times at various merchants between March 20 and March 21, 2024. One such transaction involved the sale of merchandise at a NIKE store in Maryland. Video footage (**Figure 17-18**) of the transaction shows a heavy-set light-skinned male closely resembling DE LA CRUZ with an afro and wearing glasses, a puffy black jacket and holding a cell phone, walking away with purchased merchandise. Screenshots of the video footage at the NIKE store are provided below.



Figure 17

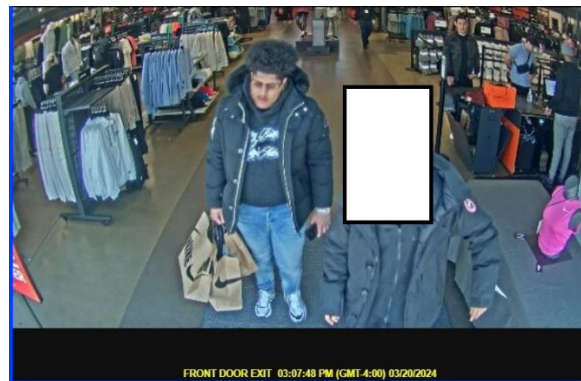


Figure 18

Other Fraud Incidents

As documented in materials obtained from Arlington County Federal Credit Union (ACFCU), on November 18, 2023, an online action was made to link Victim 5's Bank of America checking account to Co-Conspirator 2's ACFCU account in an attempt to transfer \$56,000. After limited deposits into Co-Conspirator 2's account succeeded, the credit union blocked the remaining deposits as Victim 5's Bank of America checking account was not owned by Co-Conspirator 2. An individual who identified herself as Co-Conspirator 2 subsequently walked into an ACFCU branch on November 24, 2023 and unsuccessfully argued that the deposits should be approved. The following day, an online application to open a distinct ACFCU membership account in Victim 5's name was submitted but declined. The application provided, as proof of identity, an image of Victim 5's purported New Jersey Driver's License, but the image did not correctly identify the issue date, expiration date, restrictions, height, and weight, among other features. In addition, a picture of an individual matching that of DE LA CRUZ, as depicted on his District of Columbia Driver's License, was superimposed on the image of the fraudulent license in place of that of Victim 5. Below is an image of the fraudulent New Jersey License (**Figure 19**).

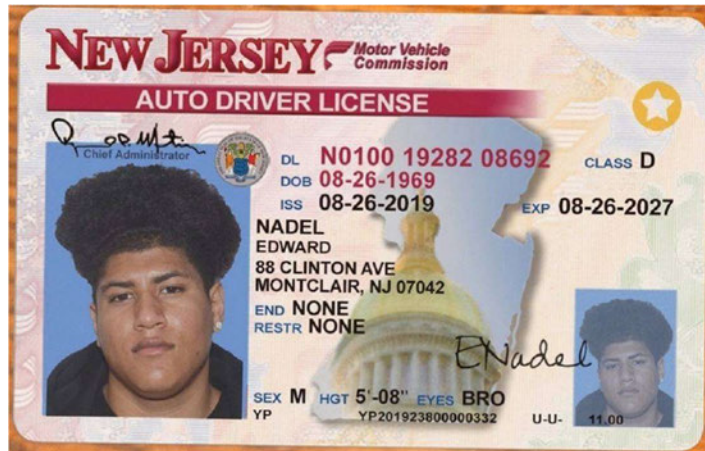


Figure 19

An accounting of unauthorized transactions on Victim 5's Bank of America checking account totaled approximately \$29,000. The transactions included several payments made toward rent, utilities, tuition, and cell phone bills directly benefitting DE LA CRUZ, his family, or known individuals who have represented they are in or were in romantic relationships with DE LA CRUZ – namely, Co-Conspirator 2 and Co-Conspirator 3. (Based on prior police reports submitted by Co-Conspirator 2 and 3 on various occasions, your affiant is also aware that both Co-conspirator 2 and 3 have been in a romantic relationship with DE LA CRUZ at various points.) Payments were also made from Victim 5's checking account to fund credit cards in some of the above individuals' names.

Social Media Posts

An individual resembling DE LA CRUZ is featured in a YouTube music video (**Figure 20**) posted on March 20, 2022², in which he raps the following lyrics:

"I scanned that [explicative] bank account," [types on a laptop] "he can't even make his payments";

"I be bustin' scans every week, he aint got no cash. And I'm getting checks off of mail."

"I got that [explicative] SSN, I went through his file."

"I'm getting money off these [explicative], they don't know how."

² The YouTube video, available at <https://www.youtube.com/watch?v=Z95h0UM57n0>, was uploaded by YouTube user "@1200_blackmigo" under the title "A1 BlackMigo 'BMF' Official Video | Shot By @100mz". The reference to "A1" and "BlackMigo" is consistent with the vanity of DE LA CRUZ's Instagram account, that is a1.blackmigo. Further, a link to this YouTube video is provided in the profile details of DE LA CRUZ's Instagram account.

”And I’m riding through your city with a Glock under my stomach.”

Screenshots of the YouTube video are provided below.



Figure 20

Instagram Video

The following video from the identified DE LA CRUZ’s Instagram account, video_331550695342802729, was posted on March 3, 2024. The stills show DE LA CRUZ wearing a Canada Goose jacket with a patch on the left shoulder and a distinctive sweatshirt with the spiderweb pattern. DE LA CRUZ can be seen wearing the same jacket and sweatshirt in mail theft robberies that occurred on February 19, 2024; March 1, 2024 and March 4, 2024. In **Figure 21a**, DE LA CRUZ is wearing a sweatshirt that he is wearing during the March 4, 2024 mail theft. In **Figure 21b** DE LA CRUZ is wearing the Canadian Goose jacket that can be seen in the February 19, 2024 and March 1, 2024 mail thefts. In **Figure 21c**, DE LA CRUZ is wearing distinctive glasses that he is wearing in all of the mail theft robberies referenced. In **Figure 21d**, DE LA CRUZ is displaying the same distinctive watch that he was wearing in the February 13, 2024 traffic stop.



Figure 21a



Figure 21b



Figure 21c



Figure 21d

The following video from the identified DE LA CRUZ's Instagram account, video_3324515902006279945 was posted on March 15, 2024. De La Cruz can be seen holding the same sweatshirt, **Figure 21e**, that he can be seen wearing during the February 24, 2024 traffic stop, and the March 4, 2024 mail theft.



Figure 21e

The following video from the identified DE LA CRUZ's Instagram account, video_3334879542345477997 was posted on March 29, 2024. De La Cruz can be seen holding and dancing with a firearm, **Figure 22a and 22b.**



Figure 22a



Figure 22b

August 10, 2024 Attempted Mail Theft Incident

On August 10, 2024, at 5:19 AM, surveillance footage from 713 Parkside Place, NE showed surveillance footage of a male suspect wearing black pants, black hoody and glasses exit a burgundy SUV, walk down a sidewalk to a mail clusterbox before accessing the clusterbox with a key. **(Figure 23a and Figure 23b)**. The individual opens the clusterbox and then walks back towards the burgundy vehicle. **(Figure 24)**. Your affiant has reviewed the footage and can identify the individual as DE LA CRUZ. Furthermore, your affiant can observe the suspect wearing a watch in the footage as the individual tries to obscure his face from the surveillance footage. **(Figure 25)**. The watch is similar in appearance as the watch depicted from DE LA CRUZ's August 16, 2024 traffic stop referenced below. Further, as discussed below, the preliminary analysis of the location data for the TARGET PHONE NUMBER, which is associated with DE LA CRUZ, places that phone in proximity to this location around the time of the theft.



Figure 23a



Figure 23b



Figure 24



Figure 25

August 10th, 2024 Robbery

A little over an hour later, at approximately 6:30 AM, on August 10, 2024 an employee of the United States Postal Service, was removing a USPS collection box for maintenance outside 901 New Jersey Avenue NW, Washington, D.C., 20001. Shortly after approaching the collection box a suspect approached the victim announcing a robbery and demanding the victim's USPS arrow keys while gripping what appeared to be a pistol tucked into his waistband. After obtaining the arrow keys from the victim the suspect walked backwards towards their vehicle while making a statement to the effect "If you do anything stupid, I'll shoot you". The suspect then entered their vehicle and departed the scene.

The victim provided the following description the suspect's appearance; Black male, with light skin, approximately 6' 2"- 6'3" in height with a husky build and wearing all black clothing including a light-colored camouflage mask and a black "skully" style cap with thin gold framed glasses. (DE LA CRUZ has since been linked to a camouflage mask, as explained below.) The victim described the suspects' vehicle as being a burgundy foreign luxury SUV / hatchback with writing over the license plate area. Included below are images of the vehicle that the suspect was driving. (**Figure 26**). The affiant notes the dark clothing and light-colored footwear worn by the suspect during the robbery (**Figure 33**) is comparable to the dark clothing and light-colored shoes in the mail theft an hour earlier. Further, as discussed below, the preliminary analysis of the location data for the TARGET PHONE NUMBER, which is associated with DE LA CRUZ, places that phone in proximity to this location around the time of the robbery.



Figure 26

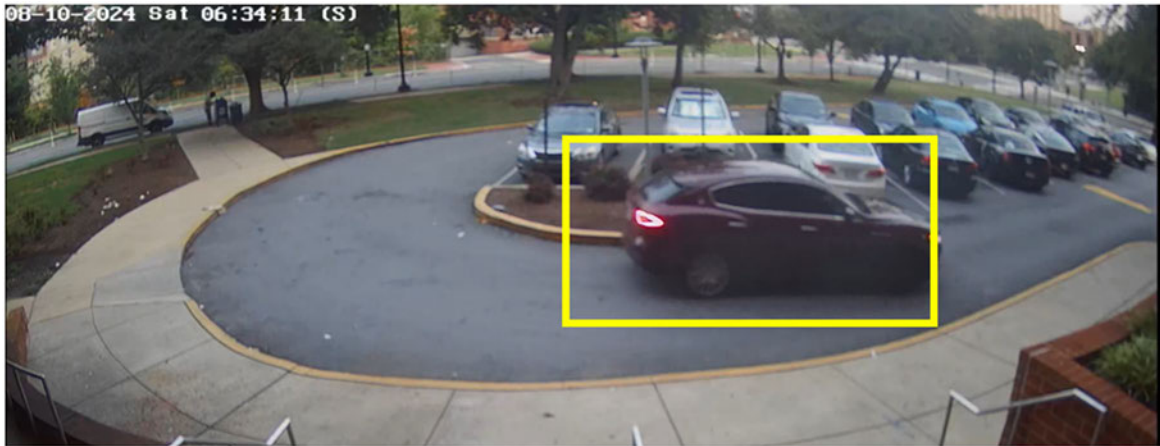


Figure 27

The vehicle that the suspect was driving during the robbery was similar in appearance to the vehicle that DE LA CRUZ was driving an hour earlier during the August 10th, 2024 mail theft. **(Figure 28).**



Figure 28

Surveillance stills below show the robbery as it occurred. **(Figure 29).** **Figure 32** shows the suspect approaching the victim and **Figure 33** shows the robbery occurring. It is also worth noting that the only thing that the suspect took was the victim's Arrow Keys and no other property, such as the victim's car keys or phone.



Figure 29

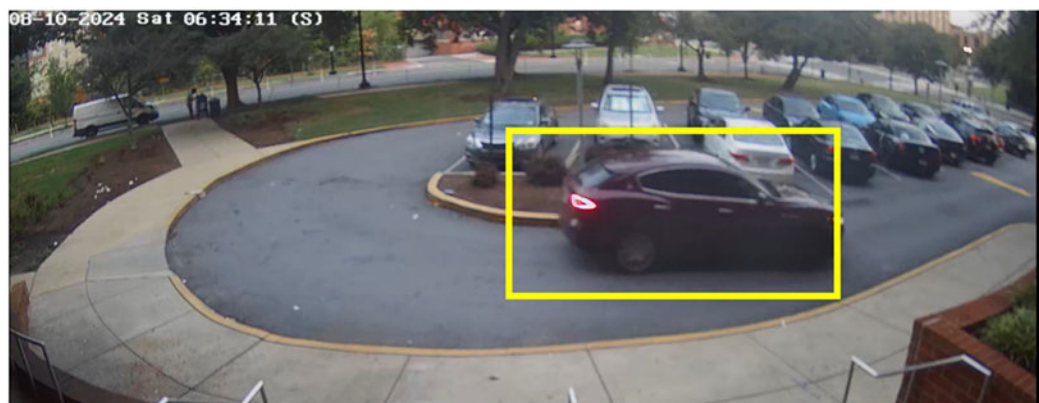


Figure 30



Figure 31



Figure 32



Figure 33

DE LA CRUZ Traffic Stop August 16, 2024

Six days later, on August 16, 2024 DE LA CRUZ was stopped while driving a red Maserati by Officer Harmon from Seat Pleasant Police in the immediate vicinity of the Landover Road and Martin Luther King Jr. Highway. DE LA CRUZ presented his driver's license to the officer during the stop and was wearing similar style glasses and watch as depicted in the earlier mail thefts. Furthermore, the red Maserati is similar to the vehicle depicted in the mail thefts and robbery that occurred on August 10th, 2024. **(Figure 34a & Figure 34b).**

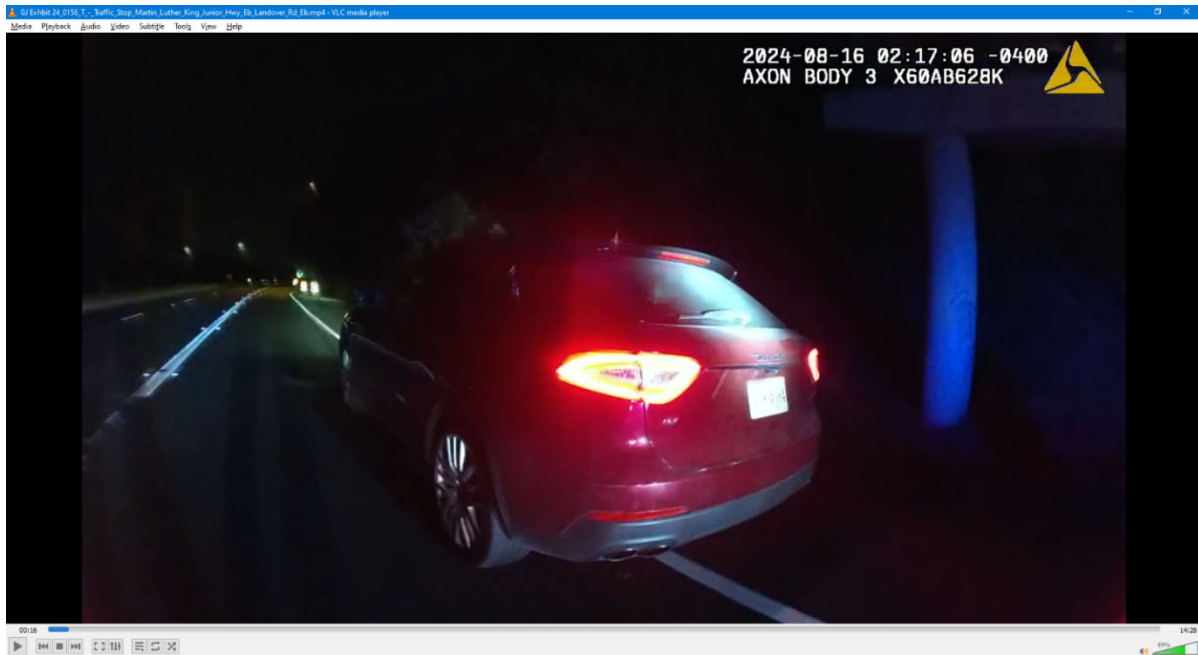


Figure 34a

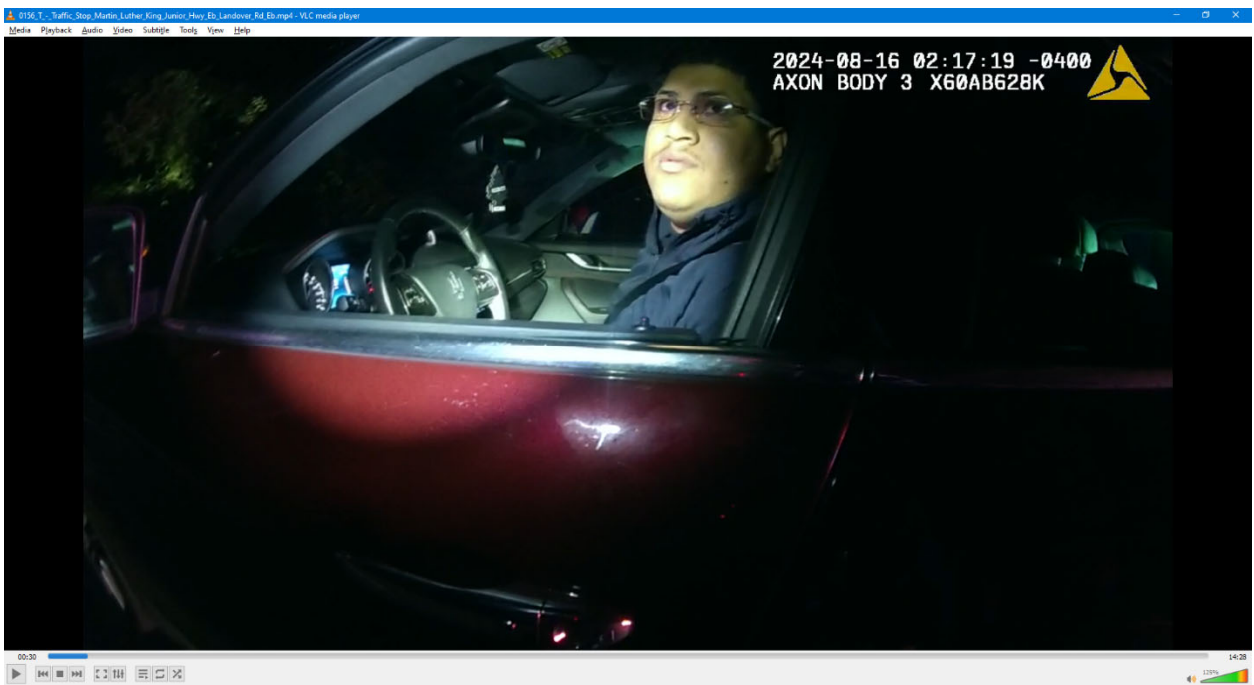


Figure 34b

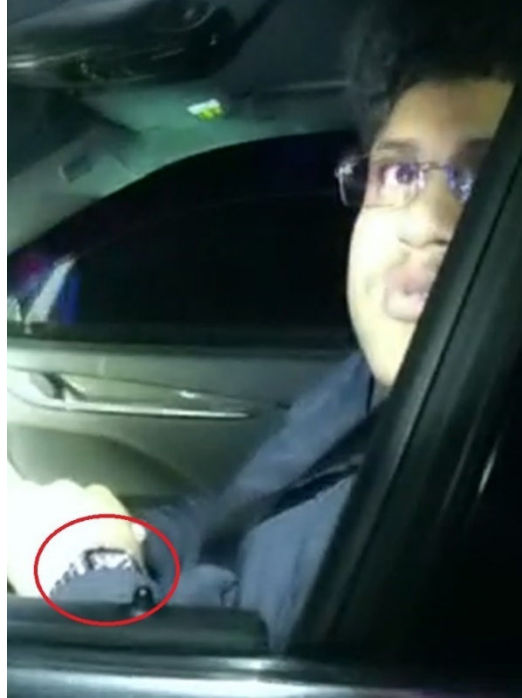


Figure 35

On September 18, 2024 law enforcement observed a photo on a1.blackmigo, the Instagram handle attributed to DE LA CRUZ where the user is driving a vehicle and the Maserati logo is observed on the steering wheel. On the same day law enforcement observed a photo on a1.blackmigo where the affiant recognized the individual as having the same build and appearance as DE LA CRUZ. The individual was wearing a camouflaged mask, consistent with the type of mask described by the armed robbery victim on August 10, 2024. **(Figure 36a and Figure 36b).**

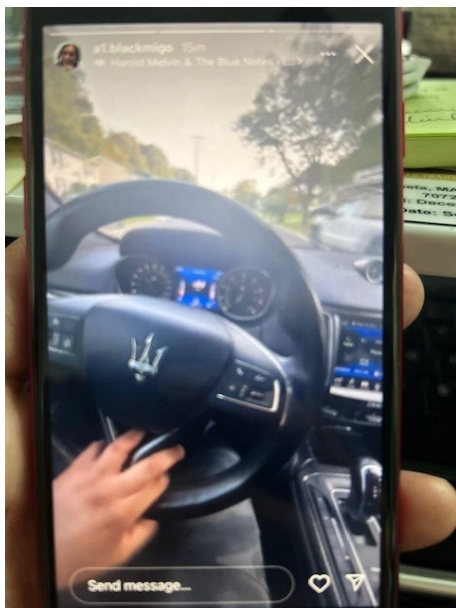


Figure 36a



Figure 36b

**LOCATION DATA FOR THE TARGET DEVICE AND ASSOCIATION WITH 4614
LIVINGSTON ROAD, SE WASHINGTON, D.C.**

Law enforcement subsequently obtained records from IP addresses used to access DE LA CRUZ's Instagram account, a1.blackmigo, in late August 2024. Law enforcement provided legal process to T-mobile seeking to identify a small sample size of the IP addresses registered to T-mobile, which resulted in the identification of (440) 850-8156, the TARGET PHONE NUMBER.

On September 12, 2024, the United States District Court for the District of Columbia issued a search warrant, in case number, 24-SC-1862, for historical and prospective location data and pen register for a period of 30 days for 440-850-8156 (the TARGET PHONE NUMBER). The TARGET PHONE NUMBER is registered to an individual is not DE LA CRUZ and has no known connection to DE LA CRUZ with a subscriber address in Ohio, and was activated on July 22, 2024. Despite the subscriber data, the TARGET PHONE NUMBER appears to be used by DE LA CRUZ because: (1) location data for the TARGET PHONE NUMBER corresponds with a time when DE LA CRUZ can be seen on the phone during a traffic stop; (2) call detail records indicate many calls to numbers known to be associated with DE LA CRUZ, including to Co-Conspirator 3, who previously reported to the police that she had been in a romantic relationship with DE LA CRUZ for over two years, and Co-Conspirator 2, described above; (3) location data places DE LA CRUZ consistently at Co-Conspirator 3's home, where he is believed to reside much of the time; and (4) DE LA CRUZ has repeatedly and consistently provided this phone number as his number on Instagram.

The TARGET PHONE NUMBER was in use in the month of August 2024, specifically in the early morning hours of August 10, 2024, prior to the robbery. A preliminary analysis of the TARGET PHONE NUMBER's location data shows the phone near the area of 713 Parkside Place, NE and 901 New Jersey Avenue, NW at the time of both the August 10th attempted mail theft and August 10th armed robbery as depicted by the human icon below. **(Figure 37a & Figure 37b).**

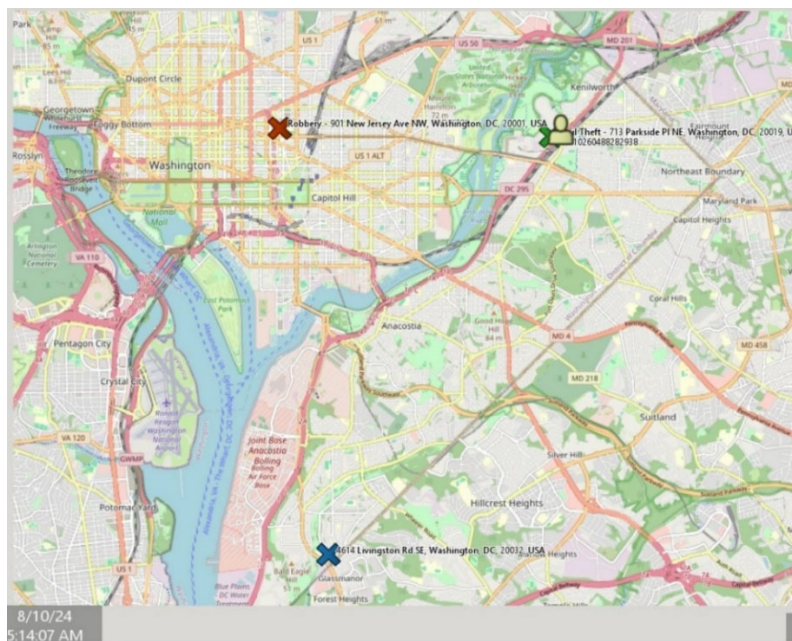


Figure 37a

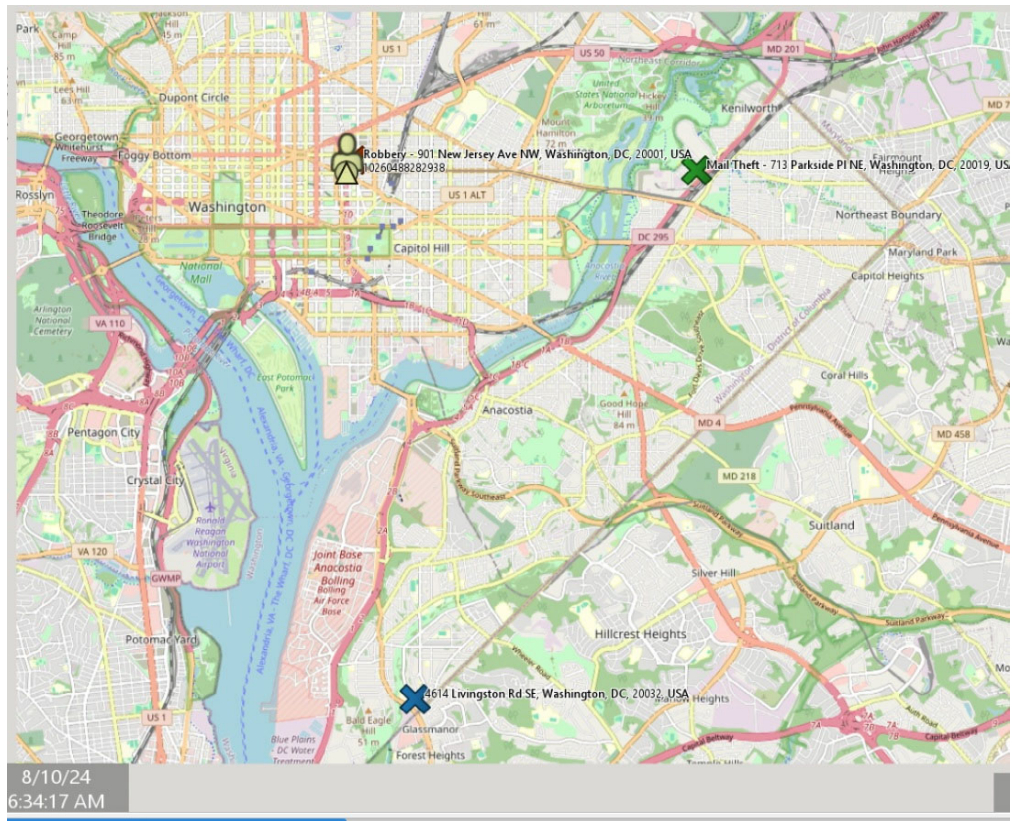


Figure 37b

The cell site location data subsequently shows the phone at an address where DE LA CRUZ is believed to be staying, which belongs to Co-Conspirator 3.

The cell site location data subsequently shows the phone at an address where DE LA CRUZ is believed to be staying, which belongs to Co-Conspirator 3.

In addition, a preliminary analysis of the TARGET PHONE NUMBER's location data shows five registered events at the time of the August 16, 2024 traffic stop in the immediate vicinity of the Landover Road and Martin Luther King Jr. Highway between 2:19 AM and 2:26 AM, where the stop occurred. The Officer Body-Worn Camera footage of the traffic stop shows the officer make a positive identification of DE LA CRUZ through his Washington, D.C. driver's license and DE LA CRUZ is seen making a phone call during the stop as well. **(Figure 38).**

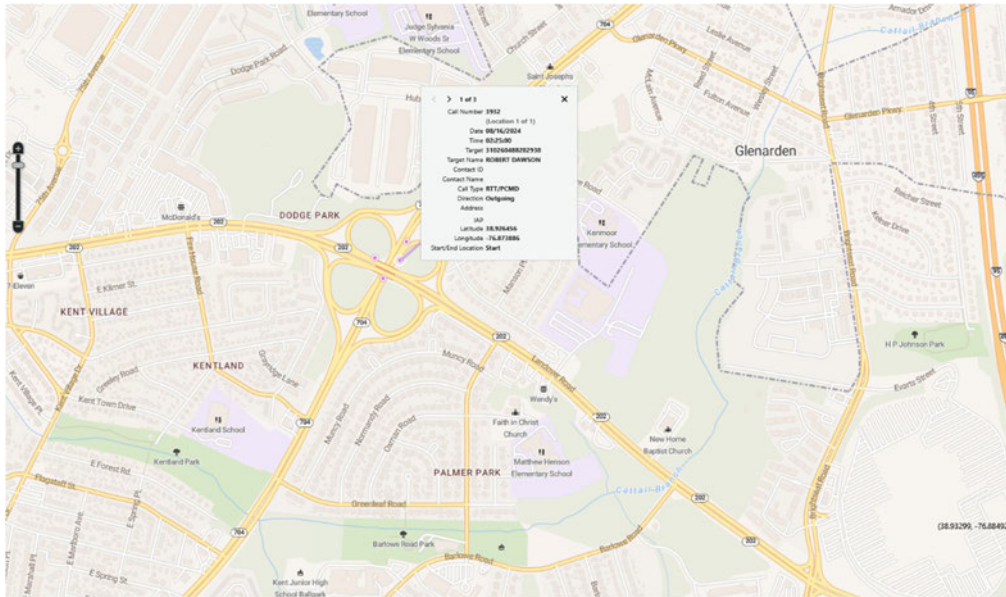


Figure 38

Connection to DE LA CRUZ

Surveillance footage of the above incidents depicts an individual bearing a strong resemblance to Ibrahim Emmanuel DE LA CRUZ, DOB 2/12/1999. The individual pictured stealing mail at 2200 17th Street, NW (as shown in **Figure 9b**) bears a strong resemblance to Ibrahim Emmanuel DE LA CRUZ, DOB 2/12/1999 as depicted in his Washington, DC Driver's License, the picture of which is provided below (**Figure 39**).

Furthermore, based on the appearance, build, clothing, you affiant can state that the individual depicted from the prior mail theft incidents in **Figures 2 & 4** (February 19, 2024 mail theft); **Figure 8c – 8d** (March 1, 2024 mail theft), **Figure 10d** (March 4, 2024 mail theft) and **Figure 23b** (August 10, 2024 mail theft) bears a strong resemblance to DE LA CRUZ as well. In addition, overlap in clothing, accessories, vehicles, further supports the conclusion that DE LA CRUZ submitted these thefts and the August 10th robbery – as does his connection to fraudulent efforts using stolen mail, his own comments on Instagram about the scheme and thefts, and preliminary cell site data.



Figure 9b



Figure 39

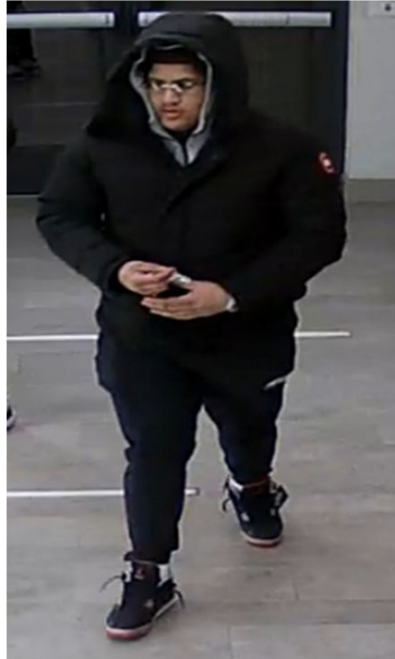


Figure 4



Figure 8c

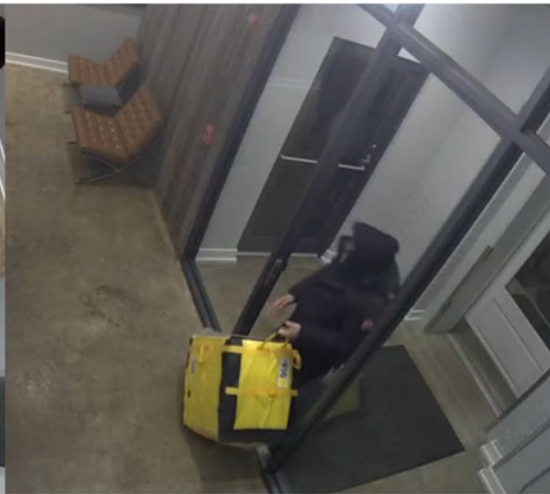


Figure 8d



Figure 10d



Figure 23b

As such, your affiant submits that probable cause exists to charge Ibrahim DE LA CRUZ with five violations of 18 U.S.C. § 1708 (**Theft or Receipt of Stolen Mail Matter Generally**) and one violation of 18 U.S.C. § 2114 (**Armed Robbery [REDACTED] of Mail, Money or Property of the United States**).

[REDACTED]

[REDACTED]

[REDACTED]

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 30th day of September, 2024.

ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE