

JD:ELM  
F. #2017R00920

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

17-M-249

- against -

**TO BE FILED UNDER SEAL**

████████████████████  
KIMBERLY ROJAS OROZCO,  
ALEXANDER BROWN,  
    also known as  
    "AJ Brown," and  
TROY STANLEY,

COMPLAINT AND AFFIDAVIT IN  
SUPPORT OF APPLICATION  
FOR ARREST WARRANTS

(18 U.S.C. § 1349)

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

GREGORY FREUDENBERG, being duly sworn, deposes and states that he is  
a Special Agent with the United States Department of Homeland Security, Homeland  
Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, in or about and between January 2014 and  
November 2017, within the Eastern District of New York and elsewhere, the defendants

████████████████████, KIMBERLY ROJAS OROZCO, ALEXANDER  
BROWN, also known as "AJ Brown," and TROY STANLEY, together with others, did  
knowingly and intentionally conspire:

(a) To devise a scheme and artifice to defraud one or more individuals and to  
obtain money and property from them by means of materially false and fraudulent pretenses,  
representations and promises, and for the purpose of executing such scheme and artifice, did

knowingly and intentionally cause matters and things which were to be delivered by the United States Postal Service to be placed in a post office or other authorized depository for mail matter to be sent and delivered by the United States Postal Service, contrary to Title 18, United States Code, Section 1341; and

(b) to devise a scheme and artifice to defraud one or more individuals and to obtain money and property from them by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, writing, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

The source of your deponent's information and the grounds for his/her belief are as follows:

1. I have been employed as a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") for approximately two years. During my tenure with HSI, I have participated in all aspects of investigations, including conducting surveillance, executing search warrants, debriefing defendants and informants, interviewing witnesses, reviewing and analyzing recorded conversations, and analyzing financial records. I am familiar with the facts and circumstances set forth below from: (a) my participation in the investigation; (b) my review of the investigative file and reports of other law enforcement officers involved in the investigation, (c) interviews with victims and witnesses; and (d) my review of bank records, telephone records, social media accounts and other sources of information.

2. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts of which I learned from other law enforcement agents. Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendants, I have not set forth each and every fact learned in the course of the investigation. Instead, I have set forth only those facts that I believe are necessary to establish probable cause for the arrest warrants sought herein. In addition, where the contents of documents, or the actions, statements and conversations of others are reported herein, they are reported in sum and substance and in part, except where otherwise indicated.

### **PROBABLE CAUSE**

#### **A. The Defendants**

3. [REDACTED]

[REDACTED]

4. The defendant KIMBERLY ROJAS OROZCO is a resident of Rockville, Maryland. ROJAS OROZCO is a 28-year-old citizen of Costa Rica. She has received approximately \$52,000 from known victims of the fraudulent scheme described below, and approximately \$24,000 from suspected victims.

5. The defendant ALEXANDER BROWN, also known as "AJ Brown," is a resident of Rockville, Maryland. BROWN is a 27-year-old American citizen, and is married to defendant KIMBERLY ROJAS OROZCO. He has received approximately \$7,300

from a known victim of the fraudulent scheme described below, and approximately \$10,200 from suspected victims.

6. The defendant TROY STANLEY is a resident of Randallstown, Maryland. STANLEY is a 33-year-old American citizen. He had received approximately \$3,600 from a known victim of the fraudulent scheme, and approximately \$19,500 from suspected victims.

B. **The Fraudulent Scheme**

7. The defendants, together with others, have carried out fraudulent schemes targeting elderly victims. In these fraudulent schemes, an individual using the name "Mark Wilson" ("Co-Conspirator One") made contact with the elderly victims by telephone, using voice over internet protocol technology ("VoIP")<sup>1</sup>, and told them that they have won money through a lottery or sweepstakes. Co-Conspirator One told the victims that they were required to pay taxes and/or fees (including attorneys' fees and United States customs fees) before their winnings could be released to them.

8. Co-Conspirator One then directed the victims to send funds to cover these purported "fees" to the defendants and others, and, in many cases, the victims complied. The fraudulently induced payments were sent to the defendants and others through bank wires, commercial money transmitters such as Western Union, and the United States Postal Service.

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<sup>1</sup> VoIP technology allows users to make voice calls using an Internet connection instead of a regular phone line. See <https://www.fcc.gov/general/voice-over-internet-protocol-voip>.

9. The victims had not, in fact, won any lottery or sweepstakes, and the money sent to the defendant and other co-conspirators was not used to pay any "fees." The victims did not receive any prize money after paying these purported "fees."

10. In paragraphs 11 through 29 below, I describe the fraudulent lottery scheme as it was implemented by the defendants [REDACTED] KIMBERLY ROJAS OROZCO, ALEXANDER BROWN, also known as "AJ Brown," and TROY STANLEY against four victims (together, the "Victims"). Evidence obtained in our investigation thus far suggests that the defendants fraudulently obtained approximately \$100,511 from the Victims, with an additional \$162,200 paid by the Victims to other co-conspirators. Additionally, the investigation has revealed approximately 25 additional suspected victims, who paid approximately \$90,350 to the defendants and other co-conspirators.

i. Victim One

11. Victim One, whose identity is known to your deponent, is an 81-year-old resident of Cape May, New Jersey and Arlington, Virginia. The defendants [REDACTED] KIMBERLY ROJAS OROZCO, ALEXANDER BROWN, also known as "AJ Brown," and TROY STANLEY, together with others, defrauded Victim One of the majority of her income since in or around January 2013. Victim One sent approximately \$61,887 – in the form of personal checks, money orders, and bank wires – to the defendants and an additional \$20,200 to other co-conspirators over approximately two years.

12. Victim One first became a victim of the fraudulent scheme at some point prior to 2014, when Co-Conspirator One contacted her by telephone and told Victim

One that she had won \$4 million in the Publisher's Clearing House Sweepstakes. Victim One had not, in fact, won any prize. Co-Conspirator One told Victim One that she was required to pay taxes and fees in order to collect her prize, and, over the course of several telephone conversations, directed Victim One to make payments to the defendants and other co-conspirators.

13. In 2016, Co-Conspirator One contacted Victim One by telephone, and informed her that her prize had expired. He explained that Victim One would be issued a refund, which had been deposited for her in an account at the "World Bank of DC." Co-Conspirator One provided Victim One with a bank account number, a PIN number and a telephone number for the "World Bank of DC." The telephone number provided by Co-Conspirator One is known to have been used in connection with other financial scams. When Victim One called the number and provided the bank account information from Co-Conspirator One, she received an automated message stating that there was \$380,000 in the account.

14. In or about December 2016, Co-Conspirator One contacted Victim One by telephone, and stated that she had to make a payment in order to obtain her refund. On January 23, 2017, Co-Conspirator One contacted Victim One, and instructed her to send \$1,000 to defendant KIMBERLY ROJAS OROZCO's Maryland residence. The following day, January 24, 2017, Co-Conspirator One contacted Victim One and instructed her to send the money to a different account, held by Account Holder One. In January 2017, Victim One, using funds provided by the New Jersey Department of Criminal Justice, sent a personal check for \$1,000 to Account Holder One's residence in Florida. Account Holder One is a friend of ROJAS OROZCO, and a review of their Facebook accounts revealed that

they, together with defendant ALEXANDER BROWN, also known as "AJ Brown," were together in Florida on January 22, 2017.

15. Based upon Co-Conspirator One's fraudulent representations, Victim One made approximately twenty five wire transfers from her bank accounts to bank accounts held by or for the benefit of the defendants KIMBERLY ROJAS OROZCO and her husband ALEXANDER BROWN, also known as "AJ Brown," and other co-conspirators, including but not limited to the following examples:

<b>Date</b>	<b>Amount</b>	<b>Description</b>
February 17, 2015	\$2,100	Wire transfer authorized by Victim One from her account at SunTrust Bank in Georgia to an account in the name of defendant ALEXANDER BROWN, also known as "AJ Brown," at Bank of America in New York
February 23, 2015	\$2,100	Wire transfer authorized by Victim One from her account at SunTrust Bank in Georgia to an account in the name of defendant ALEXANDER BROWN, also known as "AJ Brown," at Bank of America in New York
March 3, 2015	\$3,100	Wire transfer authorized by Victim One from her account at SunTrust Bank in Georgia to an account in the name of defendant ALEXANDER BROWN, also known as "AJ Brown," at Bank of America in New York

16. During the course of the investigation, I reviewed closed circuit security footage that showed the defendant ALEXANDER BROWN, also known as "AJ Brown," conducting transactions through his Bank of America account, which received fraudulent wires from Victim One, as described above.

17. Additionally, based upon Co-Conspirator One's fraudulent representations, Victim One sent money orders and personal checks drawn against her New

Jersey and Virginia bank accounts to the defendants and other co-conspirators through the United States Postal Service ("USPS") including but not limited to the following examples:

Date	Amount	Description
July 22, 2014	\$3,000	Three United States Postal Money Orders, each in the amount of \$1,000, <sup>2</sup> payable to the defendant TROY STANLEY from New Jersey to an address in Maryland
September 9, 2015	\$1,750	Personal check from Victim One's SunTrust Bank account payable to the defendant KIMBERLY ROJAS OROZCO from New Jersey to an address in Maryland
February 17, 2016	\$1,850	Personal check from Victim One's SunTrust Bank account payable to the defendant KIMBERLY ROJAS OROZCO from New Jersey to an address in Maryland
March 28, 2016	\$600	Personal check from Victim One's SunTrust Bank account payable to the defendant [REDACTED] sent from New Jersey to [REDACTED]'s home address at the time, in Brooklyn, New York
April 22, 2016	\$1,400	Personal check from Victim One's SunTrust Bank account payable to the defendant [REDACTED] sent from New Jersey to [REDACTED]'s home address at the time, in Brooklyn, New York
April 27, 2017	\$1,000	Personal check from Victim One's SunTrust Bank account payable to the defendant [REDACTED] sent from New Jersey to [REDACTED]'s home address at the time, in Brooklyn, New York

18. The checks mailed to defendant KIMBERLY ROJAS OROZCO were deposited into bank accounts at Bank of America and Wells Fargo in ROJAS OROZCO's

<sup>2</sup> Customers may send money orders in amounts up to \$1,000 within the United States.



name (the "Rojas Orozco BOA Account" and the Rojas Orozco Wells Fargo Account"). During the course of the investigation, I reviewed closed circuit security footage from Bank of America that showed ROJAS OROZCO conducting transactions in the Rojas Orozco BOA Account.

19. The checks mailed to the defendant [REDACTED] [REDACTED] were deposited into a bank account at Chase Bank in [REDACTED] name. The checks mailed to the defendant [REDACTED] were deposited into a bank account at Chase Bank in [REDACTED] name (the [REDACTED] Account) in New York State.

20. On or about November 23, 2017, Co-Conspirator One contacted Victim One by telephone and informed her that she had won a \$10 million cash prize. Co-Conspirator One directed Victim One to send \$10,000 to a bank account held by Co-Conspirator Two, whose identity is known to your deponent, in order to collect the prize. Victim One did not send any funds in connection with this call.

ii. Victim Two

21. Victim Two, whose identity is known to your deponent, is a 78-year-old resident of Bridgewater, Virginia. The defendant [REDACTED] together with others, defrauded Victim Two of the majority of his income since 2014. Victim Two sent approximately \$34,999 to [REDACTED] and approximately \$113,000 to other co-conspirators over a two year period.

22. Victim Two first became a victim of the fraudulent scheme at some point in early 2014, when Co-Conspirator One contacted him by telephone and told Victim Two that he had won \$450,000 from the "American Sweepstakes Company." Victim Two

had not, in fact, won any prize. Co-Conspirator One told Victim Two that he was required to pay taxes and fees in order to collect his prize, and, over the course of several telephone conversations, directed Victim Two to pay the "fees" by mailing certified checks to defendant CRISTOPHER SANCHEZ MINAYA and other co-conspirators.

23. Additionally, based upon Co-Conspirator One's fraudulent representations, Victim Two sent money orders and personal checks drawn against his bank accounts to the defendants and other co-conspirators through the USPS, including but not limited to the following examples:

Date	Amount	Description
February 4, 2014	\$10,999	Cashier's check from Farmers & Merchants Back, payable to the defendant [REDACTED] sent from Virginia to [REDACTED]'s home address at the time, in Brooklyn, New York
February 6, 2014	\$12,000	Cashier's check from Farmers & Merchants Back, payable to the defendant [REDACTED] sent from Virginia to [REDACTED]'s home address at the time, in Brooklyn, New York
February 19, 2014	\$12,000	Cashier's check from Farmers & Merchants Back, payable to the defendant [REDACTED] sent from Virginia to [REDACTED]'s home address at the time, in Brooklyn, New York

24. The checks mailed to the defendant [REDACTED]

[REDACTED] were deposited into a bank account at Chase Bank in the [REDACTED]

Account in New York State.

iii. Victims Three and Four

25. Victims Three and Four, whose identities are known to your deponent, are a married couple, and residents of Henrico, Virginia. Victim Three is 79 years old, and Victim Four is 70 years old. The defendant KIMBERLY ROJAS OROZCO, together with others, defrauded Victims Three and Four since 2015. Victims Three and Four sent \$3,625 to ROJAS OROZCO and approximately \$29,000 to other co-conspirators over a two year period.

26. Victims Three and Four first became a victim of the fraudulent scheme at some point in 2015, when an unknown caller contacted them by telephone and told Victims Three and Four that they had won a second place prize of \$462,000 in a sweepstakes. The caller told Victims Three and Four that they were required to pay taxes and fees in order to collect their prize, and, directed Victims Three and Four to pay the "fees" by mailing a personal check in the amount of \$3,625 and payable to the defendant KIMBERLY ROJAS OROZCO from Virginia to Maryland. Victims Three and Four did as directed, and their check was deposited into the Rojas Orozco Wells Fargo Account in Maryland.

27. Sometime later, Victims Three and Four were contacted again and advised that the first prize winner could not be located. They were informed that their prize had therefore increased to \$1 million, and that they would need to send additional "fees" to secure their increased winnings. Victim Three believes that he mailed additional checks to cover the additional "fees" from Virginia to unknown locations.

28. On July 6, 2017, during an in-person interview of Victims Three and Four, I observed Victims Three and Four receive three phone calls related to the fraudulent scheme on their home telephone line. During the first call, an unknown caller requested that

Victims Three and Four provide a check for \$4,850. During the second call, a person using the name "Darlene Smith" and identifying herself as a "Compliance Officer" ("Co-Conspirator Three") asked when Victims Three and Four would be sending the requested check. Victim Three became flustered, and indicated that he understood Co-Conspirator Three was the subject of an investigation.


29. Approximately ten minutes after Victim Three ended the second call, he received a third call from an individual using the name "Sandy Adams" and identifying herself as a "Supervisor" ("Co-Conspirator Four"). Co-Conspirator Four asked Victim Three if he was having trouble with his registration, apparently having misheard the word "investigation." Co-Conspirator Four stated that Victims Three and Four were required to send the requested \$4,850 to secure their winnings to an unknown location.


### CONCLUSION

30. In sum, I believe that the defendants [REDACTED] [REDACTED] KIMBERLY ROJAS OROZCO, ALEXANDER BROWN, also known as "AJ Brown," and TROY STANLEY conspired to and did execute and attempt to execute a scheme to defraud the Victims and obtain money and property from them by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did: (a) transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, from the Victims to the defendants' bank accounts, and for the purpose of executing such scheme and artifice, and (b) did knowingly and intentionally cause matters and things which were to be delivered by the United States Postal Service to be placed in a post office or other authorized depository for mail matter to be sent and delivered by the United States Postal Service.


31. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the instant complaint and application and related arrest warrants. The defendants are currently at liberty, and it is respectfully submitted that sealing these documents is necessary to prevent the defendants from learning that a complaint has been filed and arrest warrants issued, and to thus prevent the defendants from avoiding arrest and prosecution.

WHEREFORE, your deponent respectfully requests that the defendants

 KIMBERLY ROJAS OROZCO, ALEXANDER BROWN, also known as "AJ Brown," and TROY STANLEY be dealt with according to law, and that the Court issue arrest warrants for the defendants CRISTOPHER SANCHEZ MINAYA, KIMBERLY ROJAS OROZCO, ALEXANDER BROWN, also known as "AJ Brown," and TROY STANLEY, so that they may be dealt with according to law.

  
GREGORY FREUDENBERG  
Special Agent, United States Department of  
Homeland Security, Homeland Security  
Investigations

Sworn to before me this  
23rd day of March, 2018

  
THE HONORABLE PEGGY KUO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK