
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Mark Falk
	:	
v.	:	Mag. No. 18-3703
	:	
ISMAEL ALICEA, JR,	:	Criminal Complaint
YERRISSON GARCIA-RODRIGUEZ,	:	
JERRY LAKE-RODRIGUEZ,	:	
JOHAN LAKE-RODRIGUEZ,	:	
JEFERSSON QUEZADA, and	:	
BRAYAN ULLOA-ULLOA	:	

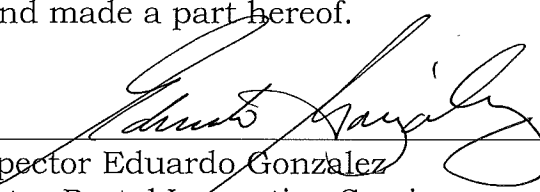
I, Eduardo Gonzalez, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Postal Inspector Eduardo Gonzalez
United States Postal Inspection Service

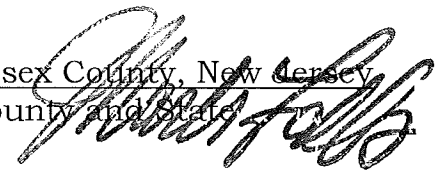
Sworn to before me and subscribed in my presence,

September 21, 2018
Date

at

Essex County, New Jersey
County and State

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession of Stolen Mail)

In or around February 2018, in the District of New Jersey and elsewhere,
the defendant,

ISMAEL ALICEA, JR,

did unlawfully have in his possession any letter, postal card, package, bag, and mail, and an article contained therein ("mail matter"), which had been stolen, taken, embezzled, and abstracted from a mail receptacle, which was an authorized depository for mail matter, knowing said mail matter to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Sections 1708 and 2.

COUNT TWO

(Conspiracy to Commit Bank Fraud)

From at least as early as in or around February 2018 through at least in or around May 2018, in the District of New Jersey and elsewhere, the defendants,

ISMAEL ALICEA, JR,
YERRISSON GARCIA-RODRIGUEZ,
JERRY LAKE-RODRIGUEZ,
JOHAN LAKE-RODRIGUEZ,
JEFFERSSON QUEZADA, and
BRAYAN ULLOA-ULLOA,

knowingly and intentionally conspired and agreed with each other and others to commit bank fraud, specifically to execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money, funds, or other property owned by, and under the custody and control of, such financial institution, by means of material false or fraudulent pretenses, representations, or promises, with the intent to deceive such financial institution, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

COUNT THREE

(Aggravated Identity Theft)

From at least as early as in or around February 2018 through in or around May 2018, in the District of New Jersey and elsewhere, the defendants,

YERRISSON GARCIA-RODRIGUEZ,
JERRY LAKE-RODRIGUEZ,
JOHAN LAKE-RODRIGUEZ, and
JEFERSSON QUEZADA,

knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to violations of Title 18, United States Code, Sections 1344 and 1349, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.

COUNT FOUR
(Bank Fraud)

From at least as early as in or around February 2018 through in or around May 2018, in the District of New Jersey and elsewhere, the defendants,

YERRISSON GARCIA-RODRIGUEZ,
JERRY LAKE-RODRIGUEZ,
JOHAN LAKE-RODRIGUEZ,
JEFERSSON QUEZADA, and
BRAYAN ULLOA-ULLOA,

knowingly executed a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money funds, or other property owned by, and under the custody and control of, such financial institution, by means of material false or fraudulent pretenses, representations, or promises, with the intent to deceive such financial institution.

In violation of Title 18, United States Code, Section 1344.

COUNT FIVE

(Possession of Stolen Mail)

In or around May 2018, in the District of New Jersey and elsewhere, the defendant,

JOHAN LAKE-RODRIGUEZ,

did unlawfully have in his possession any letter, postal card, package, bag, and mail, and an article contained therein ("mail matter"), which had been stolen, taken, embezzled, and abstracted from a mail receptacle, which was an authorized depository for mail matter, knowing said mail matter to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Sections 1708 and 2.

ATTACHMENT B

I, Eduardo Gonzalez, am a Postal Inspector with the United States Postal Inspection Service. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. 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.

The Conspiracy

1. From at least as early as in or around February 2018 through at least in or around May 2018, the defendants Ismael Alicia, Jr. ("ALICEA"), Yerrisson Garcia-Rodriguez ("GARCIA-RODRIGUEZ"), Jerry Lake-Rodriguez ("JERRY LAKE-RODRIGUEZ"), Johan Lake-Rodriguez ("JOHAN LAKE-RODRIGUEZ"), Jefersson Quezada ("QUEZADA"), Brayan Ulloa-Ulloa ("ULLOA") (collectively, "the defendants"), and others, have executed a scheme whereby checks are stolen from United States Postal Service ("USPS") blue mail collection boxes ("mail collection boxes") in Passaic, Bergen, Morris, Essex, and Middlesex Counties, and elsewhere, and fraudulently deposited into bank accounts, often within a day of being stolen. Although the checks are not made payable to the individuals in whose name the bank account is held, the actors fraudulently deposit the checks at automated teller machines ("ATMs") and then withdraw the proceeds from the accounts before the fraud is discovered.

2. Certain of the defendants deposited stolen checks into bank accounts in their own name. Others deposited stolen checks into bank accounts held in the name of a third party. Many of the accounts were used by multiple co-conspirators.

3. Some of the bank accounts used by the co-conspirators had no legitimate purpose other than to receive deposits of stolen checks.

4. Defendant ALICEA, and others, were responsible for, among other things, physically breaking into the mail collection boxes, usually late at night and using a pry bar, and stealing the mail. Defendants GARCIA-RODRIGUEZ, JERRY LAKE-RODRIGUEZ, JOHAN LAKE-RODRIGUEZ, QUEZADA, ULLOA, and others, were then responsible for depositing the stolen checks into various bank accounts. Dozens of mail collection boxes have been targeted by the conspiracy.

Manner and Means of the Conspiracy

5. On or about February 1, 2018, in the early morning hours, approximately ten mail collection boxes located in Paterson, Fair Lawn, Elmwood Park, and Clifton, New Jersey, were opened using pry bars and certain of the mail items inside stolen. Video surveillance from two of the attacks on February 1, 2018, showed a white van known to be used by ALICEA in the area at the time of the attacks.

6. Historical cell-site data for a telephone number known to be used by ALICEA revealed that ALICEA's phone was in the vicinity of the February 1, 2018, pry bar attacks. The data also revealed ALICEA's phone to be in the vicinity of approximately ten other pry bar attacks on mail collection boxes that occurred in or around March and April 2018, generally between midnight and 5 am, in towns including Elmwood Park, Oakland, Teaneck, and Franklin Lakes, New Jersey.

7. Through ATM surveillance recordings and other law enforcement techniques, the following defendants have been identified as having deposited stolen checks, as more particularly described below: GARCIA-RODRIGUEZ, JERRY LAKE-RODRIGUEZ, JOHAN LAKE-RODRIGUEZ, QUEZADA, and ULLOA.

8. QUEZADA deposited stolen checks from mail collection boxes into bank accounts held by various individuals on no fewer than four occasions, in or around March and April 2018. For example, on or about March 21, 2018, QUEZADA deposited a check for approximately \$1,300—a day after it was stolen from a mail collection box in East Rutherford, New Jersey—into a Wells Fargo & Co. ("Wells Fargo") bank account in GARCIA-RODRIGUEZ's name with an account number ending in 4638 ("the 4638 Account"). QUEZADA has withdrawn money from the 4638 Account at least once, including in or about March 2018. QUEZADA also deposited a check for approximately \$800—stolen from the mail in Hackensack, New Jersey—into a third party's Wells Fargo account number ending in 2885 ("the 2885 Account") on or about March 21, 2018. Finally, QUEZADA deposited a stolen check for approximately \$400 into a third party's Wells Fargo account number ending in 2561 ("the 2561 Account") on or about March 26, 2018.

9. Toll records reveal that ALICEA called QUEZADA on or about February 1, 2018, the date of the first wave of pry bar attacks.

10. GARCIA-RODRIGUEZ deposited stolen checks into the 4638 Account on no fewer than seven occasions, from in or about February 2018 through in or about April 2018. For example, on or about March 8, 2018, he deposited a check for approximately \$1,300 ("CHECK-1") a day after it was stolen from a mail collection box in Oakland, New Jersey ("ATTACK-1"). Another check

stolen in ATTACK-1 was deposited into the 2561 Account, also on March 8, 2018. GARCIA-RODRIGUEZ withdrew money from the 2561 Account at least twice in April 2018.

11. ALICEA's cell phone records show that he was in the area of ATTACK-1, which occurred at approximately 2am.

12. JERRY LAKE-RODRIGUEZ deposited stolen checks into accounts held by various individuals on no fewer than four occasions, in or about February and March 2018. For example, he deposited a stolen check for approximately \$500 on or about March 16, 2018, into the 2561 Account. JERRY LAKE-RODRIGUEZ also deposited a stolen check for approximately \$850, on or about February 20, 2018, and a stolen check for approximately \$1,350, on or about March 1, 2018, into the 4638 Account. He withdrew money from the 4638 Account on at least four occasions in or about February and March 2018.

13. JOHAN LAKE-RODRIGUEZ deposited stolen checks into the 2885 Account on no fewer than three occasions, from in or about March 2018 through May 2018. For example, he deposited a stolen check for approximately \$400 on or about March 23, 2018, into the 2885 Account. JOHAN LAKE-RODRIGUEZ also withdrew money at least once from the 2561 Account in April 2018. He was arrested on or about May 8, 2018, after fleeing in a vehicle from the scene of a mail collection box pry attack in Bloomfield, New Jersey. He was in possession of numerous pieces of stolen mail and two pry bars.

14. ULLOA deposited stolen checks into his Wells Fargo account number ending in 7058 ("the 7058 Account") on no fewer than four occasions, from in or about February 2018 through in or about March 2018. For example, he deposited a check for approximately \$8,000 on or about February 14, 2018, a day after it was stolen from a mail collection box in Livingston, New Jersey ("ATTACK-2"), into the 7058 Account. At least two other checks stolen in ATTACK-2 were subsequently deposited into two separate bank accounts used in the conspiracy. ULLOA also deposited a stolen check for approximately \$23,000 on or about February 28, 2018, into the 7058 Account.

15. As part of the conspiracy, the defendants, and others, deposited the following approximate aggregate amounts of stolen checks:

- a. \$16,000 into GARCIA-RODRIGUEZ's 4638 Account.
- b. \$82,000 into ULLOA's 7058 Account.
- c. \$12,000 into the 2885 Account.
- d. \$7,000 into the 2561 Account.

16. Wells Fargo is a financial institution, the deposits of which are insured by the Federal Deposit Insurance Corporation.

17. Law enforcement has identified at least \$300,000 of stolen checks that were deposited into the above-described accounts, as well as other bank accounts, as part of the conspiracy.