AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America
v.
LUCIANO ESTEVEZ

Case No. 19-MJ-1065 (AMD)

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 February through July 2019 in the county of Camden and elsewhere in the _____ District of New Jersey, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. 371; 7 U.S.C. 2024(b)	Conspiracy to defraud the United States, as more fully described in Attachment A. Defrauding the Supplemental Nutrition Assistance Program, as more fully described in Attachment A.

This criminal complaint is based on these facts:

See Attachment B. - Affidavit JDN

☑ Continued on the attached sheet.

Complainant's signature

JASON D. NOVICK, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/09/2019

Judge's signature

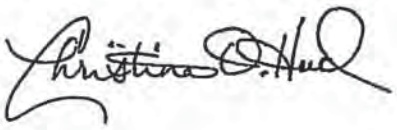
City and state: Camden, New Jersey

Honorable Ann Marie Donio, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY



By:_____

CHRISTINA O. HUD, Assistant U.S. Attorney

Date: August 9, 2019

ATTACHMENT A

COUNT 1
(Conspiracy to Defraud the United States)

From in or around February 2019 through in and around July 2019, in Camden County, in the District of New Jersey and elsewhere, defendants

LUCIANO ESTEVEZ,
OCTAVIO RODRIGUEZ,
JOSE GARCIA, and
JUAN MELO

did knowingly combine, conspire, confederate, and agree with each other and with other persons, known and unknown, to defraud the United States, namely a federal agency, the United States Department of Agriculture,

In violation of Title 18, United States Code, Section 371.

COUNT 2
(Defrauding the Supplemental Nutrition Assistance Program)

From in or around February 2019 through in and around July 2019, in Camden County, in the District of New Jersey and elsewhere, defendant

LUCIANO ESTEVEZ

did knowingly use and acquire Supplemental Nutrition Assistance Program benefits funded by the United States Department of Agriculture, and by such conduct obtained approximately $19,425 in a manner contrary to the statutes and regulations of the Supplemental Nutrition Assistance Program,

In violation of Title 7, United States Code, Section 2024(b).

AFFIDAVIT - B JDN

I, Jason Novick, am a Special Agent with the Federal Bureau of Investigation ("FBI"). 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 items of evidence. Where statements of others are related herein, they are related in substance and part. I have not set forth each and every fact that I know concerning this investigation because this Affidavit is being submitted for the limited purpose of establishing probable cause to support this Criminal Complaint and the issuance of arrest warrants. 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.

I. INTRODUCTION

1. The Federal Bureau of Investigation ("FBI"), United States Department of Agriculture, Office of Inspector General ("USDA-OIG"), United States Department of Health and Human Services, Office of Inspector General ("HHS-OIG"), and other members of law enforcement have been conducting an investigation into the illegal procurement, use, and conversion of Supplemental Nutrition Assistance Program ("SNAP") benefits funded by the USDA by individuals associated with various grocery and convenience stores in and around Camden, New Jersey ("the Investigation").

2. At all times relevant to this Criminal Complaint, the following individuals were involved in a conspiracy to defraud a program utilizing federal funds provided by the United States Department of Agriculture ("USDA") intended to provide nutritional assistance to needy individuals and families through SNAP:

a) LUCIANO ESTEVEZ, a resident of Camden, New Jersey. ESTEVEZ is the owner, operator, and/or manager of LOCAL STORE 1, FNS No. ending in 208,[1] located in Camden, New Jersey.

b) OCTAVIO RODRIGUEZ, a resident of Pennsauken, New Jersey. RODRIGUEZ is the manager of LOCAL STORE 2, FNS No. ending in 359, located in Camden, New Jersey.

c) JOSE GARCIA, a resident of Camden, New Jersey. GARCIA is a freelance salesman of candy and other retail goods to grocery stores in and around Camden, New Jersey.

d) JUAN MELO, a resident of Woodlynne, New Jersey. MELO is a former employee of LOCAL STORE 1.

3. At all times relevant to this Criminal Complaint:

[1] FNS Numbers, or Food Nutrition Service Numbers, are based on USDA records.

a) Confidential Source 1 ("CS-1")[2] worked with law enforcement as part of the Investigation into the conspiracy to defraud the United States through the unlawful procurement of SNAP funds, including, but not limited to, ESTEVEZ, RODRIGUEZ, GARCIA, and MELO (collectively, "THE CO-CONSPIRATORS"); and

b) Confidential Source 2 ("CS-2")[3] worked with law enforcement as part of the Investigation into the conspiracy to defraud the United States through the unlawful procurement of SNAP funds, including, but not limited to, ESTEVEZ, RODRIGUEZ, GARCIA, and MELO.

II. BACKGROUND

4. The Supplemental Nutrition Assistance Program ("SNAP"), formerly known as the "Food Stamp Program," is a program funded by the USDA in accordance with the Food Stamp Act of 1977. The USDA works with state governmental agencies, such as the New Jersey Department of Human Services ("DHS"), to assist low-income individuals who qualify to purchase groceries and certain food items.

5. Between 1939 and 2001, Food Stamp Program beneficiaries were issued paper coupons, or food stamps, as a way to acquire low or no cost food for themselves and their families. In 2001, the program transitioned from the paper coupon system to the current electronic system of access devices to distribute SNAP benefits. Today, SNAP benefits are loaded onto EBT cards similar to commercial debit cards. The EBT cards have personal identifying information and other data concerning the applicant stored on them electronically. Each month, EBT cards are automatically credited with the appropriate level of food stamp benefits for each SNAP recipient to subsidize food purchases at participating supermarkets, convenience stores, and other food retailers. The balance of an EBT card may be ascertained by calling a customer service phone line, which is typically printed on the back of EBT cards.

6. Importantly, SNAP benefits may only be used to purchase specific food items, and may not be used to purchase prepared foods, alcoholic beverages, pet food, or other non-food items. More fundamentally, SNAP benefits may not be exchanged for cash or other items of value, a practice known as "trafficking."

7. Store owners seeking to participate in SNAP as SNAP merchants must prepare and file an application with USDA's Food and Nutrition Service Agency ("FNS") on a Form FNS 252, which discloses, among other things, the store owner's identity and certain background information. The Form

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[2] CS-1 is a paid informant and has provided information to law enforcement in connection with this and other matters. Law enforcement has determined that the information CS-1 has provided in connection with other matters was credible, and consistent with other information obtained during the investigation of such matters. In connection with this Investigation, CS-1 provided information corroborated by other facts learned during the course of the Investigation. Accordingly, law enforcement deems information provided by CS-1 to be credible.

[3] CS-2 is a paid informant and has provided information to law enforcement in connection with this and other matters. Law enforcement has determined that the information CS-2 has provided in connection with other matters was credible, and consistent with other information obtained during the investigation of such matters. In connection with this Investigation, CS-2 provided information corroborated by other facts learned during the course of the Investigation. Accordingly, law enforcement deems information provided by CS-2 to be credible.

FNS 252 requires the store owner to certify that he/she provided truthful and complete information on the form; acknowledge that if he/she provides false information to FNS, the application may be withdrawn or denied; and accept responsibility on behalf of the store for violations of SNAP regulations. Specifically, the Form FNS 252 requires the store owner to acknowledge that trading cash for SNAP benefits is a violation of SNAP regulations. Further, by signing the Form FNS-252, the store owner certifies that he/she has read and understood the conditions of participating in SNAP, and agrees to follow program rules and regulations.

8. Once a store owner has been authorized to enroll in SNAP (thus becoming an "Authorized Retailer"), the Authorized Retailer will receive a valid FNS Number and will be required to use an EBT terminal, purchased through a third-party processor ("the Third-Party Processor"). The processing includes the electronic debiting of a SNAP beneficiary's account and the crediting of the SNAP merchant's bank account. When purchasing food, the beneficiary provides the card to the merchant, who then swipes the EBT card through the EBT terminal. After the customer enters a confidential Personal Identification Number ("PIN"), the EBT terminal verifies the PIN, determines whether the customer's account balance is sufficient to cover the proposed transaction, and decides whether the transaction should be authorized or denied. If the transaction is authorized, the amount of the purchase is then deducted electronically from the SNAP benefits reserved for the customer, and the amount is credited to the SNAP merchant's designated bank account. Only the Third-Party Processor has contact with the SNAP merchants' bank accounts.

9. A financial intermediary ("the Financial Intermediary") assists DHS in processing SNAP benefits by facilitating transactions between DHS and the Third-Party Processor. In this role, the Financial Intermediary pulls funds from the Federal Reserve Bank of Richmond and transfers to the Third-Party Processor, who then facilitates the crediting and debiting of SNAP beneficiary and SNAP merchant accounts.

10. In or around February 2012, an individual believed to be RODRIGUEZ's relative submitted a SNAP application to USDA's FNS for LOCAL STORE 2 to participate in SNAP. By executing and submitting the application, RODRIGUEZ's relative attested that he/she read the warnings and certifications, which provided, among other things, that LOCAL STORE 2 would abide by SNAP rules and regulations. RODRIGUEZ's relative signed a certification acknowledging that LOCAL STORE 2 agreed to accept responsibility for violations of SNAP regulations, including trading cash for SNAP benefits. On or about October 25, 2018, an individual believed to be RODRIGUEZ's relative submitted a reauthorization SNAP application to USDA's FNS for LOCAL STORE 2 to continue to participate in SNAP.

11. In or around November 12, 2018, ESTEVEZ submitted a SNAP application to USDA's FNS for LOCAL STORE 1 to participate in SNAP. However, the application was withdrawn by FNS on December 21, 2018 due to "non-response to information requested." By executing and submitting the original application, ESTEVEZ attested that he read the warnings and certifications, which provided, among other things, that he would abide by SNAP rules and regulations. ESTEVEZ further signed a certification acknowledging that he agreed to accept responsibility for violations of SNAP regulations, including trading cash for SNAP benefits.

III. INVESTIGATION OVERVIEW

12. Beginning in approximately February 2019 and continuing through the present, law enforcement has been conducting an investigation into a scheme to defraud the United States, namely the USDA, through unlawful SNAP benefit transactions. The Investigation has revealed that, during this time, ESTEVEZ, RODRIGUEZ, GARCIA, MELO, and others, known and unknown, have unlawfully trafficked SNAP benefits in exchange for cash, controlled substances, and/or other items of value. As described more fully below, law enforcement has reason to believe that the CO-CONSPIRATORS are continuing to engage in actions in furtherance of a SNAP fraud trafficking conspiracy.

13. As provided in significant detail below, in general, the CO-CONSPIRATORS sought out individuals who possessed or had access to EBT cards loaded with federal funds from SNAP. As part of the scheme, the CO-CONSPIRATORS agreed to purchase EBT cards from such individuals in exchange for approximately half the value of the EBT card. The half value of the EBT card was paid in cash, controlled substances, or other items of value. For example, if an EBT card had $500 of EBT funds on it, the CO-CONSPIRATORS would give the cardholder approximately $250 in cash or controlled substances in exchange. This arrangement allowed the EBT cardholder to gain quick access to cash or controlled substances, which they otherwise could only spend on certain food items. The Investigation revealed that, as a further part of the scheme, upon purchasing the EBT cards, the CO-CONSPIRATORS would then utilize the EBT cards to purchase bulk goods and food items from nearby large-scale superstores. These goods and food items would then be resold in the small convenience and grocery stores owned or affiliated with the CO-CONSPIRATORS or their known associates. This would result in a profit for the CO-CONSPIRATORS and their associates. Accordingly, in continuing with the above example, upon purchasing the $500 EBT card from an individual, the CO-CONSPIRATORS would use that $500 EBT card to purchase goods and items at superstores, which they then would resell in their own small grocery/convenience stores or sell to other storeowners and associates for a profit.

14. Between February 2019 and July 2019, at the instruction of law enforcement officers, CS-1 and CS-2 engaged in 43 controlled transactions with ESTEVEZ, RODRIGUEZ, GARCIA, and MELO involving the misuse of SNAP benefits in an effort to defraud the United States. The 43 controlled SNAP fraud transactions are summarized in the below chart:

Date	Transaction Nos.	EBT Value Exchanged (approx.)	Persons Directly Involved
2-8-19	1	$259.52	ESTEVEZ, CS-1
2-14-19	2	$308.67	ESTEVEZ, CS-1
2-21-19	3	$500.00	ESTEVEZ, GARCIA, CS-1
2-25-19	4	$814.82	ESTEVEZ, GARCIA, MELO, CS-1
2-27-19	5	$475.00	ESTEVEZ, CS-1
3-6-19	6, 7, 8	$1,622.61	ESTEVEZ, RODRIGUEZ, GARCIA, MELO, CS-1, CS-2
3-12-19	9, 10	$1,638.10	ESTEVEZ, RODRIGUEZ, GARCIA, MELO, CS-1
3-19-19	11, 12	$1,563.88	ESTEVEZ, RODRIGUEZ, MELO, CS-1
3-28-19	13, 14, 15	$2,131.43	ESTEVEZ, RODRIGUEZ, CS-1, CS-2
4-5-19	16, 17, 18	$2,105.56	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1
4-15-19	19, 20, 21	$2,365.51	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1
5-1-19	22, 23, 24, 25	$2,884.56	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1, CS-2
5-14-19	26, 27, 28	$3,268.93	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1
5-22-19	29, 30, 31	$3,512.67	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1
6-5-19	32, 33, 34	$3,465.50	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1
6-18-19	35, 36, 37	$5,178.73	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1
7-19-19	38, 39, 40	$4,379.36	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1
7-25-19	41, 42, 43	$4,084.77	ESTEVEZ, RODRIGUEZ, GARCIA, CS-1
TOTAL		**$40,559.62**	

15. During the Investigation, law enforcement conducted surveillance and reviewed communications obtained through consensually recorded transactions between the CO-CONSPIRATORS and CS-1 and CS-2, in which the CO-CONSPIRATORS discussed the trafficking operation and were observed engaging in fraudulent SNAP benefit transactions.

16. During the Investigation, law enforcement officers also obtained toll records for cellular telephones registered to the CO-CONSPIRATORS. Law enforcement conducted a toll analysis, focusing on and around the dates of the 43 transactions. The toll analysis showed that ESTEVEZ, RODRIGUEZ, GARCIA, and MELO communicated with each other, particularly on or around the dates and times of the

controlled exchanges. Indeed, the toll analysis revealed that, between approximately January 1, 2019 and May 1, 2019:

a) ESTEVEZ and GARCIA communicated approximately 650 times;

b) ESTEVEZ and MELO communicated more than 200 times; and

c) RODRIGUEZ and MELO communicated over 400 times.

17. As provided in greater detail below, the Investigation has revealed that the CO-CONSPIRATORS' illegal SNAP trafficking activity extended well beyond their fraudulent transactions with CS-1 and CS-2. In fact, records obtained by law enforcement during the course of the Investigation revealed that the CO-CONSPIRATORS used hundreds of fraudulently procured EBT cards at large-scale superstores in and around Southern New Jersey for the purpose of purchasing bulk goods and food items for resale in small convenience and grocery stores owned or affiliated with the CO-CONSPIRATORS and their associates. This fraudulent conduct resulted in the misuse of hundreds of thousands of federal funds.

18. Furthermore, as also discussed in greater detail below, ESTEVEZ obtained a rogue EBT terminal that was registered to a large superstore in Philadelphia, Pennsylvania ("SUPERSTORE 1") for use at LOCAL STORE 1 during the course of the conspiracy. By exploiting a point of the system in which the USDA and the Third-Party Processor and/or the Financial Intermediary systems do not synchronize, the Investigation revealed that ESTEVEZ received SNAP funds through the rogue EBT terminal rather than SUPERSTORE 1. USDA records obtained during the course of the Investigation showed that approximately $110,000 of SNAP funds were run through the rogue EBT terminal.

19. An analysis of the CO-CONSPIRATORS' telephone records also highlights the extent of their fraudulent conduct. Specifically, to check the balance of an EBT card, SNAP Recipients can call a customer service telephone line, typically printed on the back of the EBT card. The toll analysis conducted by law enforcement during the Investigation showed that the CO-CONSPIRATORS constantly called the New Jersey and Pennsylvania EBT customer service lines to check the balance of EBT cards. More specifically, in the time period between January 1, 2019 and May 1, 2019:

a) ESTEVEZ called the New Jersey and Pennsylvania EBT customer service telephone lines more than 1,350 times;

b) RODRIGUEZ called the New Jersey EBT customer service telephone line approximately 9 times;

c) GARCIA called the New Jersey and Pennsylvania EBT customer service telephone lines approximately 62 times; and

d) MELO called the New Jersey and Pennsylvania EBT customer service telephone lines approximately 41 times.

IV. THE CONTROLLED TRANSACTIONS

Transaction 1: February 8, 2019

20. During a consensually recorded exchange on or about February 6, 2019, CS-1 met with ESTEVEZ at LOCAL STORE 1 as ESTEVEZ opened the store in the morning. During this exchange, CS-1 informed ESTEVEZ that he/she was aware of several individuals from a nearby methadone clinic who have EBT cards and would like to sell their cards to ESTEVEZ in exchange for cash. ESTEVEZ responded affirmatively.

21. Two days later, on or about February 8, 2019, CS-1 conducted a consensually monitored exchange of EBT cards for cash with ESTEVEZ at LOCAL STORE 1. EBT cards with approximately $259.52 in value were exchanged for cash.

22. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

23. During Transaction 1, as evidenced by the recording, ESTEVEZ inquired about the amount of funds on the cards. In front of CS-1, ESTEVEZ made a telephone call for the purpose of checking the balance on the cards. Toll analysis from the date of Transaction 1 shows that ESTEVEZ made multiple calls to the New Jersey EBT customer service line at the time of the controlled card exchange.

Transaction 2: February 14, 2019

24. On or about February 14, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards for cash with ESTEVEZ. EBT cards with approximately $308.67 in value were exchanged for cash.

25. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

26. On that date, CS-1 met ESTEVEZ at LOCAL STORE 1 for the purpose of exchanging EBT cards for cash. During the consensually monitored operation, CS-1 and ESTEVEZ drove together in ESTEVEZ's vehicle to a nearby large-scale superstore in Cherry Hill, New Jersey ("SUPERSTORE 2"). No one else was present and/or entered the car during this consensually monitored operation. CS-1 and ESTEVEZ remained under surveillance by law enforcement during this time. Further, the meeting was recorded by the device provided to CS-1 by law enforcement.

27. While ESTEVEZ and CS-1 were in ESTEVEZ's vehicle together, ESTEVEZ told CS-1: "[Y]ou know one thing? I'm trying to get a machine. Don't tell nobody nothing. I'm trying to put a machine, EBT, on the side. It's illegal. Every time you come with a card, boom, I give you the money, you know what I mean? Every day, we don't have to wait to go shopping. You gonna swipe it right then." CS-1 asked Estevez how he planned to acquire the machine, to which ESTEVEZ responded: "I got people. I'm going to try to get it for this month."

28. Upon arrival at the SUPERSTORE 2, CS-1 entered SUPERSTORE 2 and purchased 19 cases of baby formula using the controlled EBT cards. After completing the purchase, CS-1 reentered ESTEVEZ's vehicle. As heard on the recording, CS-1 asked ESTEVEZ if ESTEVEZ could "flip" the baby formula for profit, to which ESTEVEZ responded affirmatively. ESTEVEZ told CS-1 that he would call his friend to see if he would take the baby formula for sale.

29. During the recorded and surveilled operation, upon leaving SUPERSTORE 2, ESTEVEZ and CS-1 stopped to a local convenience store, at which point ESTEVEZ briefly exited the vehicle and entered the store. Upon re-entering the vehicle, ESTEVEZ informed CS-1 that he could acquire another EBT card for purchase. As heard on the recording, ESTEVEZ told CS-1: "Don't worry, we're making money."

30. Toll analysis conducted by law enforcement revealed a series of telephone calls between ESTEVEZ, MELO, and GARCIA during this time:

- 09:45 a.m.: ESTEVEZ received an incoming call from MELO;
- 10:02 a.m.: ESTEVEZ received an incoming call from GARCIA;
- 10:06 a.m.: ESTEVEZ made an outgoing call to GARCIA;
- 10:08 a.m.: ESTEVEZ received an incoming call from GARCIA;
- 10:20 a.m.: ESTEVEZ received an incoming call from GARCIA;
- 10:36 a.m.: ESTEVEZ received an incoming call from MELO.

31. Thereafter, ESTEVEZ and CS-1 returned to LOCAL STORE 1. ESTEVEZ entered LOCAL STORE 1 for the purpose of obtaining another EBT card. Thereafter, ESTEVEZ and CS-1 once again entered ESTEVEZ's vehicle. No one else was in the vehicle. ESTEVEZ and CS-1 then drove to another convenience store in Camden, New Jersey, where ESTEVEZ unloaded the baby formula for sale.

32. Following the completion of the exchange of baby formula, ESTEVEZ provided CS-1 with approximately $150 in cash, which was approximately half the value of the EBT card CS-1 provided to ESTEVEZ that was used to purchase the baby formula.

33. As evidenced from the recording, during the car ride, ESTEVEZ and CS-1 further discussed ESTEVEZ's plan to illegally acquire a rogue EBT terminal at LOCAL STORE 1. During the conversation, ESTEVEZ inquired whether CS-1 could recruit others to bring EBT cards to LOCAL STORE 1 and exchange them for cash. ESTEVEZ stated: "[P]eople get stupid, that's when they get caught. They be watching you but you don't get caught right away, they make your case, they working on you like 5 or 6 months to get somebody, that's what they do. Even if they start watching me when I get the card, in 6 months, if I stop, that's it. If I keep doing it, then I get in trouble."

Transaction 3: February 21, 2019

34. On or about February 21, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards for cash with ESTEVEZ and GARCIA at LOCAL STORE 1. ESTEVEZ and GARCIA jointly received EBT cards with approximately $500 in value in exchange for cash.

35. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

36. During the transaction, CS-1 entered LOCAL STORE 1, where both ESTEVEZ and GARCIA were present. As heard on the recording, CS-1 and GARCIA discussed individuals at the nearby methadone clinic who would be willing to sell their EBT cards in exchange for cash.

37. Also during the transaction, as heard on the recording, CS-1 and ESTEVEZ again discussed ESTEVEZ's plans to unlawfully acquire an EBT terminal at LOCAL STORE 1.

Transaction 4: February 25, 2019

38. On or about February 25, 2019, CS-1 engaged in a consensually-monitored exchange of EBT cards for cash with ESTEVEZ and GARCIA at LOCAL STORE 1. ESTEVEZ and GARCIA jointly received EBT cards with approximately $814.82 in value in exchange for cash.

39. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

40. On that date, CS-1 entered LOCAL STORE 1 for the purpose of exchanging EBT cards for cash. Upon entry, ESTEVEZ was not yet at the store, and CS-1 therefore called ESTEVEZ. During the call, CS-1 told ESTEVEZ that he had two EBT cards to sell in exchange for cash, and the two discussed going to other large-scale superstores with GARCIA to purchase food items to be resold at local convenience and grocery stores in Camden, New Jersey. Toll analysis confirms this telephone call.

41. Since ESTEVEZ was not yet at LOCAL STORE 1 upon CS-1's arrival, CS-1 met with ESTEVEZ's employee, MELO. During this recorded conversation, MELO told CS-1 that CS-1 could also take EBT cards to exchange for cash at another store on Haddon Avenue in Camden. Information obtained during the Investigation revealed that the store was LOCAL STORE 2, which was owned and operated by RODRIGUEZ. Also during the recorded conversation, employees at LOCAL STORE 1 showed CS-1 Viagra[4] pills that were available for sale through LOCAL STORE 1.

42. Shortly thereafter, ESTEVEZ and GARCIA arrived at LOCAL STORE 1. As evidenced by the recording, ESTEVEZ, GARCIA, and CS-1 discussed taking CS-1 to nearby large-scale superstores to open membership accounts and buy food with EBT cards that would then be resold for profit at local convenience and grocery stores in and around Camden, New Jersey.

43. Thereafter, ESTEVEZ, GARCIA, and CS-1 entered ESTEVEZ'S vehicle. There was no one else in the car. During this operation, CS-1 remained under constant surveillance by law enforcement, and the entire operation was recorded by the device provided to CS-1 by law enforcement.

44. During the car ride, ESTEVEZ asked CS-1 several times how soon and how many EBT cards CS-1 could acquire to exchange for cash.

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[4] Viagra is a prescription medication for erectile dysfunction.

45. Law enforcement observed ESTEVEZ, GARCIA, and CS-1 arrive at a largescale superstore located in Maple Shade, New Jersey ("SUPERSTORE 3"). Law enforcement observed all 3 individuals enter SUPERSTORE 3 together. Once inside SUPERSTORE 2, CS-1 was directed by ESTEVEZ and GARCIA to open a membership account, which would allow him/her to buy items in bulk at SUPERSTORE 3. ESTEVEZ paid the membership fee. Thereafter, ESTEVEZ, GARCIA, and CS-1 purchased 18 cases of baby formula at SUPERSTORE 3 using an EBT card.

46. ESTEVEZ, GARCIA, and CS-1 were surveilled re-entering ESTEVEZ'S vehicle, and departing SUPERSTORE 3. During this operation, CS-1 remained under constant surveillance by law enforcement, and the entire operation was recorded by the device provided to CS-1 by law enforcement.

47. Law enforcement then observed ESTEVEZ, GARCIA, and CS-1 arrive at another large superstore located in Cinnaminson, New Jersey ("SUPERSTORE 4"). As evidenced by the recording, ESTEVEZ provided CS-1 with cash to open a membership account at SUPERSTORE 4. Law enforcement observed all 3 individuals enter SUPERSTORE 4 together. Once inside SUPERSTORE 4, CS-1 paid to open a membership account using the money provided by ESTEVEZ.

48. Thereafter, law enforcement observed ESTEVEZ, GARCIA, and CS-1 re-enter ESTEVEZ'S vehicle. The individuals—who remained under constant surveillance by law enforcement—returned to LOCAL STORE 1, where they unloaded the baby formula. ESTEVEZ then told CS-1 he would receive $430—slightly more than half the value of the EBT cards—for his role in the conduct. ESTEVEZ is heard on the recording telling CS-1: "You want to make money, you gonna make money . . . every time you get a card. Let's work."

Transaction 5: February 27, 2019

49. On or about February 27, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at approximately $475 for cash with ESTEVEZ at LOCAL STORE 1.

50. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

51. Upon arriving at LOCAL STORE 1, CS-1 called ESTEVEZ to confirm the exchange. Toll analysis conducted by law enforcement confirms this telephone call. During the conversation, ESTEVEZ and CS-1 had the following exchange:

CS-1:	"[L]isten, I got one of them cards. I just pulled up to the store. I got one for like $475."
ESTEVEZ:	"Oh, you got one?"
CS-1:	"Yeah, I told ya I was gonna bring it this morning. I told ya."
ESTEVEZ:	"Okay."
CS-1:	"I got one for $475 so if you don't have—if you only have $200 on ya, just gimme, just gimme the $200 and you're gonna spend $400, you know what I mean?"
ESTEVEZ:	"Okay, okay. . . . I'm gonna be there in like . . . 40 mins."

CS-1: "30 minutes to 40 minutes? Alright. Alright, brother. Alright, I'll be at the store waiting."

52. Thereafter, CS-1 entered LOCAL STORE 1, where he encountered MELO. Shortly thereafter, CS-1 called ESTEVEZ. This call was confirmed by toll analysis conducted by law enforcement. Law enforcement saw ESTEVEZ arrive at LOCAL STORE 1, at which point he exchanged cash for an EBT card with approximately $475 in value with CS-1.

Transactions 6 and 7: March 6, 2019

53. On or about March 6, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at approximately $1,297 for cash with ESTEVEZ and GARCIA at LOCAL STORE 1 and RODRIGUEZ at LOCAL STORE 2.

54. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

55. That day, CS-1 went to LOCAL STORE 1 with 4 controlled EBT cards in the amounts of $265, $375, $320, and $337 (total, $1,297). Once inside LOCAL STORE 1, CS-1 met with ESTEVEZ and MELO. ESTEVEZ told CS-1 that GARCIA was on his way with cash to exchange for the EBT cards.

56. ESTEVEZ and CS-1 agreed that ESTEVEZ would purchase 2 of the cards, and GARCIA would purchase 1 card. ESTEVEZ and CS-1 discussed the value of the cards at $922 ($265 + $320 + $337), and ESTEVEZ agreed to pay CS-1 $460 for the cards, which represents approximately half of the value of the 3 cards.

57. Toll analysis conducted by law enforcement showed 2 outgoing calls from ESTEVEZ's telephone number to the New Jersey EBT customer service line during the relevant time frame, presumably for the purpose of checking the value on the EBT cards.

58. While at LOCAL STORE 1, CS-1 and MELO discussed that MELO's "boy" at another local store was interested in buying the remaining $375 EBT card, which the Investigation revealed to be RODRIGUEZ at LOCAL STORE 2. During this exchange at LOCAL STORE 1, MELO made a telephone call and spoke to someone in Spanish before confirming to CS-1, "he said OK. [He wants] the big one." Based on my training and experience, I believe that MELO was referring to the $375 EBT card in making this statement. Approximately half an hour later while CS-1 was still at LOCAL STORE 1, MELO received a telephone call, and MELO told CS-1 that his "buddy" wanted to know when CS-1 would arrive at his store. Analysis of MELO's telephone records conducted by law enforcement corroborate outgoing and incoming calls between MELO and RODRIGUEZ during the relevant time.

59. Law enforcement observed CS-1 depart LOCAL STORE 1 and travel to LOCAL STORE 2. CS-1 remained under constant surveillance by law enforcement, and CS-1 did not make any stops along the way. Once at LOCAL STORE 2, CS-1 entered the store and, as evidenced by the recording, engaged with RODRIGUEZ. During the exchange, RODRIGUEZ told CS-1 he would pay him $190 for the card, which was slightly more than half the $375 value of the EBT card. As seen on the recording,

RODRIGUEZ gave CS-1 $100 in cash and told him to return the following day for the remainder of the money.

60. Thereafter, law enforcement observed CS-1 leave LOCAL STORE 2 and return to LOCAL STORE 1, at which point ESTEVEZ gave CS-1 $80 in cash and promised to pay him the remainder at a later date.

Transaction 8: March 6, 2019 and March 12, 2019

61. That same day, on or about March 6, 2019, CS-2 engaged in a consensually monitored exchange of EBT cards with approximately $300 in value in exchange for cash and controlled substances with ESTEVEZ at LOCAL STORE 1.

62. Prior to the controlled exchange, law enforcement officers conducted a pre-buy search of CS-2, which showed that CS-2 did not have any controlled substances on his/her person. After the completion of the search, law enforcement provided CS-2 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-2 with a digital audio/video recorder and transmitting device to record the transaction.

63. Upon entry into the store, CS-2 observed ESTEVEZ behind the counter at LOCAL STORE 1. As evidenced by the recording, CS-2 and ESTEVEZ discussed ESTEVEZ purchasing the card from CS-2 and giving CS-2 approximately half the value of the EBT funds on the card.

64. During this conversation, ESTEVEZ and CS-2 discussed the exchange of controlled substances—specifically, Viagra—in addition to exchanging cash for the EBT card. ESTEVEZ agreed to give CS-2 half the value of the $300 EBT card by giving CS-2 $70 in cash and 5 Viagra pills valued at $10 each (for a total of $50). ESTEVEZ was overheard telling CS-2 that he still owed CS-2 an additional $30.

65. Toll analysis conducted by law enforcement reveals an outgoing call from ESTEVEZ to the New Jersey's EBT customer service line at the time of the controlled card exchange, presumably to check the value of the card provided by CS-2.

66. Thereafter, on or about March 12, 2019, CS-2 returned to LOCAL STORE 1 to finalize the transaction. Prior to the controlled exchange, law enforcement equipped CS-2 with a digital audio/video recorder and transmitting device to record the transaction.

67. Upon entering the store, an employee at LOCAL STORE 1 gave CS-2 $30 to finalize payment for the prior March 6, 2019 exchange. As heard on the recording, CS-2 and MELO also discussed CS-2 acquiring additional EBT cards to exchange.

Transactions 9 and 10: March 12, 2019

68. On or about March 12, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards for cash with ESTEVEZ at LOCAL STORE 1 and with RODRIGUEZ at LOCAL STORE 2.

ESTEVEZ and RODRIGUEZ received EBT cards with approximately $1,638.10 in value in exchange for cash.

69. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

70. Law enforcement observed CS-1 arrive at LOCAL STORE 1 and enter ESTEVEZ'S vehicle. As evidenced by the recording, during the conversation in ESTEVEZ's vehicle, ESTEVEZ offered to exchange 5 cards with CS-1, and discussed GARCIA possibly being interested in buying EBT cards in exchange for cash. While in the vehicle, ESTEVEZ called the Pennsylvania EBT customer service line to confirm the amounts on the EBT cards. Toll analysis conducted by law enforcement corroborated this call.

71. Thereafter, law enforcement observed CS-1 exit ESTEVEZ's vehicle and enter LOCAL STORE 1, where he engaged in conversation with MELO. MELO told CS-1 that his friend was at his store and wanted to buy EBT cards. CS-1 was then observed leaving LOCAL STORE 1, entering his/her vehicle, and traveling to LOCAL STORE 2. The vehicle remained under constant surveillance by law enforcement and did not make any stops along the way.

72. Once at LOCAL STORE 2, RODRIGUEZ purchased an EBT card from CS-1 with a value of $331. As heard on the recording, RODRIGUEZ offered to pay CS-1 $165—approximately half the value of the card. RODRIGUEZ then gave CS-1 $82 in cash, and told CS-1 he would pay the remainder of the amount the following day.

73. Thereafter, law enforcement observed CS-1 leave LOCAL STORE 2 and return to LOCAL STORE 1. CS-1 remained under constant surveillance during this time. Upon returning to LOCAL STORE 1, CS-1 entered the store. As seen on the video recording, MELO was at the counter with a stack of EBT card sorting through them. While conversing with CS-1, MELO asked CS-1: "Where does your friend get the cards? Can he get a lot?" MELO also told CS-1 that he planned to use the purchased EBT cards to buy baby formula, which would then be resold in local grocery and convenience stores.

74. Upon leaving LOCAL STORE 1, CS-1 met with ESTEVEZ at a predetermined location and entered ESTEVEZ's vehicle. During the exchange, ESTEVEZ counted $930 in value for the EBT cards, and offered to pay CS-1 half the value of the cards, or $465. As heard on the recording, ESTEVEZ then gave CS-1 $280 in cash and told him he would pay him the remaining amount at a future point in time.

Transactions 11 and 12: March 19, 2019

75. On or about March 19, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards for cash with ESTEVEZ at LOCAL STORE 1 and with RODRIGUEZ at LOCAL STORE 2. ESTEVEZ and RODRIGUEZ received EBT cards with approximately $1,563.88 in value in exchange for cash.

76. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

77. Upon entering LOCAL STORE 1, ESTEVEZ and CS-1 discussed the sale of 3 EBT cards valued at approximately $800 total, and ESTEVEZ told CS-1 he would pay CS-1 half—approximately $400—for the cards. During the exchange, ESTEVEZ made several phone calls to check the balances on the EBT cards. An analysis of ESTEVEZ's telephone records showed that ESTEVEZ called the New Jersey EBT customer service line 4 times and the Pennsylvania EBT customer service line 1 time during the relevant time frame.

78. Also during the exchange, ESTEVEZ told CS-1 that he was going to acquire "the machine" that day. Based on my knowledge of the Investigation, I believe that ESTEVEZ was referring to the previously mentioned rogue EBT terminal that he planned to illegally procure for LOCAL STORE 1.

79. While at LOCAL STORE 1, MELO and CS-1 discussed CS-1 going to meet MELO's "boy" at another store for the purpose of selling EBT cards. Based on my knowledge of the Investigation, I believe CS-1 and MELO were discussing the sale of EBT cards to RODRIGUEZ at LOCAL STORE 2. MELO made a telephone call and then confirmed for CS-1 to head to the other store. Toll analysis conducted by law enforcement confirms that MELO called RODRIGUEZ at this time.

80. Thereafter, law enforcement observed CS-1 leave LOCAL STORE 1 and head to LOCAL STORE 2. CS-1 remained under constant surveillance by law enforcement and did not stop anywhere along the way. As evidenced by the recording, once inside LOCAL STORE 2, RODRIGUEZ and CS-1 exchanged EBT cards for cash. Analysis of RODRIGUEZ's telephone records showed that RODRIGUEZ called the New Jersey EBT customer service line twice during this time.

Transaction 13: March 28, 2019

81. On or about March 28, 2019, CS-2 engaged in a consensually monitored exchange of EBT cards for cash and controlled substances with ESTEVEZ at LOCAL STORE 1. During the transaction, ESTEVEZ was provided with EBT cards with approximately $315 in value in exchange for 10 Viagra pills valued at $100 ($10 per pill) and $50 in cash.

82. Prior to the controlled exchange, law enforcement officers conducted a pre-buy search of CS-2, which showed that CS-2 did not have any controlled substances on his/her person. After the completion of the search, law enforcement provided CS-2 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-2 with a digital audio/video recorder and transmitting device to record the transaction.

83. Upon entering LOCAL STORE 1, CS-2 told ESTEVEZ he had an EBT card valued at $315 to sell. As evidenced by the recording, ESTEVEZ made a telephone call to confirm the value of the EBT card. Toll analysis conducted by law enforcement showed that ESTEVEZ called the New Jersey EBT customer service line at this time.

84. ESTEVEZ agreed to pay CS-2 $50 in cash, and gave CS-2 10 Viagra pills valued at $10 per pill (total $100), for a total of $150, which represented approximately half the value of the EBT card CS-2 gave to ESTEVEZ. During the exchange, ESTEVEZ and CS-2 also discussed ESTEVEZ's ability to acquire Percocet[5] for sale.

Transactions 14 and 15: March 28, 2019 and March 29, 2019

85. Also on or about March 28, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at approximately $1,816.43 for cash with ESTEVEZ at LOCAL STORE 1 and another male known to law enforcement at LOCAL STORE 2.

86. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

87. Upon entering LOCAL STORE 1, CS-1 presented ESTEVEZ with 3 EBT cards. ESTEVEZ made a telephone call to confirm the amounts on the cards. An analysis of ESTEVEZ's telephone records indicates that he made 2 outgoing calls to the New Jersey EBT customer service line and 2 outgoing calls to the Pennsylvania EBT customer service line during this time. During the transaction, ESTEVEZ paid CS-1 approximately half the value of the 3 EBT cards.

88. During the consensually monitored operation, it was observed that ESTEVEZ had acquired a rogue EBT terminal for use at LOCAL STORE 1. During the transaction, ESTEVEZ and CS-1 discussed the terminal.

89. Upon leaving LOCAL STORE 1, law enforcement observed CS-1 drive to LOCAL STORE 2. The vehicle remained under constant surveillance by law enforcement, and did not make any other stops along the way. Upon entering LOCAL STORE 2, CS-1 told an unknown male, who has since been identified to law enforcement ("INDIVIDUAL 1"), that he wanted to speak to RODRIGUEZ. INDIVIDUAL 1 then made a telephone call to RODRIGUEZ, and handed the phone to CS-1 so that CS-1 could speak to RODRIGUEZ. CS-1 told RODRIGUEZ that he/she had 2 EBT cards to exchange.

90. Thereafter, INDIVIDUAL 1 gave CS-1 $100 in cash as partial payment for the EBT cards. The following day, March 29, 2019, CS-1 returned to LOCAL STORE 2 to receive the remainder of his payment for the EBT cards from RODRIGUEZ.

Transactions 16, 17, 18: April 5, 2019

91. On or about April 5, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at approximately $2,105.56 for cash with ESTEVEZ at LOCAL STORE 1, RODRIGUEZ at LOCAL STORE 2, and GARCIA in his vehicle.

92. Prior to the controlled exchanges, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchanges. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

[5] Percocet is a brand name oxycodone and aceptaminophen prescription medication.

93. Law enforcement observed CS-1 enter LOCAL STORE 2. As evidenced by the recording, RODRIGUEZ and CS-1 engaged in an exchange of EBT cards for cash.

94. Thereafter, law enforcement observed CS-1 depart LOCAL STORE 2. CS-1 remained under constant surveillance by law enforcement, and did not make any stops. Law enforcement then saw CS-1 meet with GARCIA in GARCIA's vehicle. As seen on the recording, CS-1 and GARCIA exchanged EBT cards for cash.

95. Law enforcement observed CS-1 depart the location with GARCIA, and travel to LOCAL STORE 1. Upon arriving at LOCAL STORE 1, CS-1 met with ESTEVEZ. During the exchange, ESTEVEZ purchased several cards valued at over $1,000 in exchange for cash.

96. Telephone records analysis conducted by law enforcement revealed that ESTEVEZ contacted the New Jersey EBT customer service line approximately 36 times that day.

Transactions 19, 20, 21: April 15, 2019

97. On or about April 15, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at $2,365.51 for cash with ESTEVEZ at LOCAL STORE 1, RODRIGUEZ at LOCAL STORE 2, and GARCIA in his vehicle and at LOCAL STORE 1.

98. Prior to the controlled exchanges, law enforcement met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

99. Law enforcement observed CS-1 enter LOCAL STORE 2, at which point he gave RODRIGUEZ 2 EBT cards. During the exchange, RODRIGUEZ asked CS-1 if the cards were "full." An analysis of RODRIGUEZ's telephone records revealed that RODRIGUEZ called the New Jersey EBT customer service line during this time.

100. Following the exchange at LOCAL STORE 2, law enforcement observed CS-1 drive to and enter a vehicle occupied by GARCIA ("GARCIA VEHICLE 1"). As evidenced by the recording, GARCIA and CS-1 exchanged an EBT card for cash, and discussed ESTEVEZ purchasing additional cards from CS-1.

101. Following the exchange in GARCIA VEHICLE 1, law enforcement observed CS-1 depart to LOCAL STORE 1. The entire operation was observed by law enforcement, and CS-1 did not make any stops along the way. Upon arriving at LOCAL STORE 1, CS-1 met with ESTEVEZ to exchange 4 EBT cards for cash.

Transactions 22, 23, 24: May 1, 2019

102. On or about May 1, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at $2,464.56 for cash with ESTEVEZ at LOCAL STORE 1, RODRIGUEZ at LOCAL STORE 2, and GARCIA at a local gas station inside GARCIA's vehicle.

103. Prior to the controlled exchanges, law enforcement met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transactions.

104. During this transaction, law enforcement observed CS-1 enter LOCAL STORE 2 and engage in discussion with RODRIGUEZ. As evidenced by the recording, RODRIGUEZ purchased an EBT card from CS-1 and gave CS-1 cash. Toll analysis conducted by law enforcement showed that RODRIGUEZ called the New Jersey EBT customer service line during this time.

105. Upon leaving LOCAL STORE 2, CS-1 called GARCIA and agreed to meet GARCIA at a nearby gas station. A review of GARCIA's telephone records confirmed this call. Upon meeting GARCIA at the gas station, CS-1 entered a vehicle with GARCIA ("GARCIA VEHICLE 2"). As evidenced by the recording, GARCIA purchased several EBT cards valued at approximately $1,000 total. In exchange, GARCIA gave CS-1 approximately $250 in cash, and said he would pay the remainder at a subsequent time.

106. Thereafter, law enforcement observed CS-1 leave the gas station and travel to LOCAL STORE 1. CS-1 remained under the constant observation of law enforcement during this time, and did not make any stops along the way. Upon arriving at LOCAL STORE 1, ESTEVEZ exchanged an EBT card for cash with CS-1. While in the store, an unknown male approached CS-1 and told him that he also planned to sell his EBT card to ESTEVEZ in exchange for cash.

107. Toll analysis conducted by law enforcement showed that ESTEVEZ called the New Jersey EBT customer service line once during the time of the controlled card exchange.

Transaction 25: May 1, 2019

108. Also on or about May 1, 2019, CS-2 engaged in a consensually monitored exchange of EBT cards for cash and controlled substances with MELO at LOCAL STORE 1. MELO received EBT cards valued at $420, and CS-2 was provided with 15 Cialis[6] pills valued at $150 ($10 a pill) and $60 in cash in exchange.

109. Prior to the controlled exchange, law enforcement officers conducted a pre-buy search of CS-2, which showed that CS-2 did not have any controlled substances on his/her person. After the completion of the search, law enforcement provided CS-2 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-2 with a digital audio/video recorder and transmitting device to record the transaction.

110. As evidenced by the recording, CS-2 entered LOCAL STORE 1, at which point he/she engaged in a discussion with MELO about purchasing an EBT card valued at approximately $420 in exchange for cash. MELO indicated that he was short on cash at the moment, and paid CS-2 $60 in cash and gave him/her 15 Cialis pills valued at $10 a pill ($150 total).

[6] Cialis is a prescription medication for erectile dysfunction.

Transactions 26, 27, 28: May 14, 2019

111. On or about May 14, 2019, CS-1 engaged in consensually monitored exchanges of EBT cards valued at $3,268.93 for cash and controlled substances with ESTEVEZ at LOCAL STORE 1, RODRIGUEZ at LOCAL STORE 2, and GARCIA in his vehicle.

112. Prior to the controlled exchange, law enforcement officers conducted a pre-buy search of CS-1, which showed that CS-1 did not have any controlled substances on his/her person. After the completion of the search, law enforcement provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

113. Prior to the controlled exchange, toll analysis shows that GARCIA and CS-1 had a telephone call. During this call, GARCIA asked to purchase EBT cards from CS-1.

114. Later that morning, CS-1 went to LOCAL STORE 2 to meet with RODRIGUEZ for the purpose of exchanging EBT cards for cash. During the transaction, RODRIGUEZ told CS-1 that he needed a few days to get some cash to pay for the cards, and asked CS-1 to return in several days for the cash.

115. Upon leaving LOCAL STORE 2, law enforcement observed CS-1 travel to meet GARCIA. CS-1 remained under constant surveillance during this time. Law enforcement observed CS-1 enter GARCIA VEHICLE 1. As evidenced by the recording, GARCIA purchased several cards from CS-1. GARCIA was observed giving CS-1 cash.

116. Thereafter, law enforcement observed CS-1 exit GARCIA VEHICLE 1, re-enter his vehicle, and travel to LOCAL STORE 1. CS-1 remained under constant surveillance during this time, and did not make any stops along the way. Upon arriving at LOCAL STORE 1, CS-1 entered the store and engaged in a discussion with ESTEVEZ about ESTEVEZ's ability to provide "pills" in exchange for EBT cards. ESTEVEZ then obtained several EBT cards collectively valued at $1,880 from CS-1 in exchange for $40 in cash and 90 Viagra pills valued at $900 ($10 per pill).

Transactions 29, 30, 31: May 22, 2019 and May 23, 2019

117. On or about May 22, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at $3,512.67 for cash with ESTEVEZ at LOCAL STORE 1, INDIVIDUAL 1 at LOCAL STORE 2, and GARCIA in his vehicle.

118. Prior to the controlled transactions, on or about May 20, 2019, CS-1 met with ESTEVEZ outside LOCAL STORE 1. During this exchange, CS-1 and ESTEVEZ discussed ESTEVEZ paying CS-1 for EBT cards with "percs." Based on my training and experience, I believe that ESTEVEZ and CS-1 were referring to the sale of Percocet. Later that morning, CS-1 also met with GARCIA, at which point the two discussed a future exchange of EBT cards two days later.

119. On or about May 22, 2019, law enforcement observed CS-1 enter LOCAL STORE 2. Prior to the controlled exchange, law enforcement officers met with CS-1, and provided CS-1 with controlled

EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

120. Upon entering LOCAL STORE 2, CS-1 told INDIVIDUAL 1 to contact RODRIGUEZ. As seen on the recording, INDIVIDUAL 1 made a telephone call, and handed the phone to CS-1. CS-1 told RODRIGUEZ that he had 2 cards valued at approximately $800. Upon hanging up the phone, INDIVIDUAL 1 checked the balance on the cards, and gave CS-1 $150 in cash as partial payment.

121. Thereafter, law enforcement observed CS-1 leave LOCAL STORE 2 in a vehicle. CS-1 remained under constant surveillance by law enforcement, and the vehicle did not make any stops. Law enforcement saw CS-1 arrive at a location and approach GARCIA VEHICLE 2. As heard on the recording, GARCIA and CS-1 exchanged EBT cards for cash.

122. Thereafter, law enforcement observed CS-1 leave the scene in his/her vehicle and travel to LOCAL STORE 1. The vehicle remained under constant surveillance by law enforcement, and did not make any stops along the way. Upon arriving at LOCAL STORE 1, CS-1 gave several EBT cards to ESTEVEZ in exchange for cash. As heard on the recording, CS-1 and ESTEVEZ also discussed ESTEVEZ giving CS-1 "percs" as partial payment for the EBT cards. Based on my training and experience, I believe ESTEVEZ and CS-1 were referring to Percocet in this conversation.

123. The following day, May 23, 2019, CS-1 returned to LOCAL STORE 2, where RODRIGUEZ paid him in cash for the balance of the amount due from the controlled card exchange the previous day. That same day, CS-1 also returned to LOCAL STORE 1, where ESTEVEZ paid him in cash for the remainder of the controlled card exchange the previous day. CS-1 also received cash from GARCIA on May 23, 2019, which represented the balance of the amount due from the controlled card exchange the previous day.

Transactions 32, 33, 34: June 5, 2019

124. On or about June 5, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at $3,465.50 for cash with ESTEVEZ at LOCAL STORE 1, RODRIGUEZ at LOCAL STORE 2, and GARCIA in his vehicle.

125. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

126. Law enforcement observed CS-1 enter LOCAL STORE 2. As seen on the recording, RODRIGUEZ and CS-1 exchanged cash and EBT cards valued at approximately $820.

127. Thereafter, law enforcement observed CS-1 leave LOCAL STORE 2 in a vehicle. CS-1 remained under constant surveillance by law enforcement. A few minutes later, CS-1 met GARCIA at a predetermined location. As evidenced by the recording, GARCIA counted money aloud, and then received several EBT cards in exchange for cash.

128. Law enforcement then observed CS-1 re-enter his/her vehicle and drive to LOCAL STORE 1. CS-1 remained under constant surveillance by law enforcement, and did not make any stops along the

way. Upon entering LOCAL STORE 1, ESTEVEZ exchanged several EBT cards for cash with CS-1. During this exchange, ESTEVEZ and CS-1 discussed ESTEVEZ acquiring "pills" as partial payment for the EBT cards. Based on my training and experience, I believe that ESTEVEZ and CS-1 were referring to controlled substances during this conversation.

Transactions 35, 36, 37: June 18, 2019

129. On or about June 18, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at $5,178.73 for cash with ESTEVEZ at LOCAL STORE 1, RODRIGUEZ at LOCAL STORE 2, and GARCIA in his vehicle.

130. Prior to the controlled exchange, law enforcement officers met with CS-1 and provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

131. Law enforcement observed CS-1 enter LOCAL STORE 2. As evidenced by the recording, CS-1 and RODRIGUEZ briefly spoke at the counter, and then exchanged EBT cards for cash. RODRIGUEZ is heard on the recording asking CS-1 for the card's PIN.

132. Thereafter, law enforcement observed CS-1 exit LOCAL STORE 2 and enter his/her vehicle. CS-1 remained under constant surveillance by law enforcement and did not make any stops. Shortly thereafter, CS-1 approached GARCIA VEHICLE 1. As heard on the recording, GARCIA and CS-1 exchanged EBT cards valued at approximately $1,000 for cash. GARCIA asked CS-1 to procure more EBT cards because he needed to get "a lot of milk." Based on my training and experience, I believe that GARCIA was referring to purchasing goods and food for resale.

133. Shortly thereafter, law enforcement observed CS-1 re-enter his/her vehicle and drive to LOCAL STORE 1. The vehicle remained under constant surveillance by law enforcement and did not make any stops along the way. Upon arriving at LOCAL STORE 1, CS-1 and ESTEVEZ exchanged EBT cards valued at approximately $3,300 for cash. ESTEVEZ gave CS-1 $100 as partial payment for the EBT cards, and told CS-1 that he would "take care of" CS-1 at a future point in time.

Transactions 38, 39, 40: July 19, 2019

134. On or about July 19, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at $4,379.36 for cash and controlled substances with ESTEVEZ at LOCAL STORE 1, RODRIGUEZ at LOCAL STORE 2, and GARCIA in his vehicle.

135. Prior to the controlled exchange, law enforcement officers conducted a pre-buy search of CS-1, which showed that CS-1 did not have any controlled substances on his/her person. After the completion of the search, law enforcement provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

136. As evidenced by the recording, CS-1 entered LOCAL STORE 2 and encountered INDIVIDUAL 1, who informed CS-1 that RODRIGUEZ was not there but that INDIVIDUAL 1 would call him to let him know that CS-1 was at the store with EBT cards. INDIVIDUAL 1 made a telephone

call and handed the phone to CS-1 so that CS-1 and RODRIGUEZ could discuss the exchange of EBT cards for cash. Thereafter, INDIVIDUAL 1 took the cards and gave CS-1 $100 in cash.

137. Law enforcement observed CS-1 depart LOCAL STORE 2 in his/her vehicle. The vehicle remained under constant surveillance by law enforcement and eventually arrived at a predetermined location, where CS-1 exited his/her vehicle and approached GARCIA VEHICLE 2. GARCIA and CS-1 exchanged EBT cards valued at approximately $1,320 for cash. Law enforcement observed GARCIA count bills and hand them to CS-1.

138. Shortly thereafter, CS-1 re-entered his/her vehicle and departed for LOCAL STORE 1. The vehicle remained under constant surveillance by law enforcement and did not make any stops. Upon entering LOCAL STORE 1, CS-1 and ESTEVEZ discussed the sale of EBT cards. As evidenced on the recording, CS-1 gave ESTEVEZ EBT cards valued at approximately $2,185 in exchange for cash and oxycodone 30 milligram pills.[7] ESTEVEZ told CS-1 to return in a few days for more oxycodone pills.

Transactions 41, 42, 43: July 25, 2019

139. On or about July 25, 2019, CS-1 engaged in a consensually monitored exchange of EBT cards valued at $4,084.77 for cash and controlled substances with ESTEVEZ at LOCAL STORE 1, RODRIGUEZ at LOCAL STORE 2, and GARCIA in his vehicle.

140. Prior to the controlled exchange, law enforcement officers conducted a pre-buy search of CS-1, which showed that CS-1 did not have any controlled substances on his/her person. After the completion of the search, law enforcement provided CS-1 with controlled EBT cards to effectuate the controlled exchange. Law enforcement also equipped CS-1 with a digital audio/video recorder and transmitting device to record the transaction.

141. Law enforcement observed CS-1 arrive at LOCAL STORE 2, where CS-1 exchanged an EBT card for cash with RODRIGUEZ.

142. Upon leaving LOCAL STORE 2, CS-1 entered a vehicle and traveled to LOCAL STORE 1. The vehicle remained under constant surveillance and did not make any stops along the way. Upon arriving at LOCAL STORE 1, CS-1 entered the store and sold ESTEVEZ EBT cards valued at approximately $400 in exchange for 11 Percocet 10-milligram pills and 11 Viagra pills, valued at approximately $200.

143. Thereafter, law enforcement observed CS-1 leave LOCAL STORE 1 and travel to meet GARCIA. Upon arriving at the location, CS-1 approached GARCIA VEHICLE 2 and, as heard on the recording, GARCIA purchased EBT cards valued at over $3,000. Thereafter, GARCIA told CS-1 he did not have sufficient funds to pay CS-1, and asked CS-1 to follow him to another location so that he could retrieve more money.

144. Through aerial and ground surveillance, law enforcement observed GARCIA drive to and meet with an unknown male in East Camden, who provided GARCIA with a significant amount of cash.

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[7] Oxycodone is a semi-synthetic narcotic analgesic prescription medication that is prescribed for pain management. See https://www.dea.gov/druginfo/drug_data_sheets/Oxycodone.pdf. Oxycodone is an opiate that is the active ingredient in a number of narcotic pain medications, including Percocet.

Thereafter, GARCIA (who remained under law enforcement surveillance) met with CS-1 in a nearby parking lot, at which point he provided CS-1 with a significant amount of cash.

V. ADDITIONAL TRAFFICKING ACTIVITY

145. The Investigation has likewise revealed that the scope of the CO-CONSPIRATORS' fraud extends well beyond the above-described controlled transactions.

Activity In and Around LOCAL STORE 1 and LOCAL STORE 2

146. For example, during the consensually recorded controlled transaction with CS-1 on March 12, 2019, as evidenced by the recording, MELO was observed flipping through a substantial volume of EBT cards held together with a rubber band. During this encounter, CS-1 asked MELO if he had acquired an EBT card from his acquaintance, which in actuality was a fictitious name. In response, MELO flipped through the stack of EBT cards searching for the fictitious name given by CS-1.

147. Moreover, as evidenced from the recording from the April 5, 2019 transaction, CS-1 interacted with an unidentified individual on the street outside LOCAL STORE 1. That individual told CS-1 that he left his EBT card with ESTEVEZ, and that ESTEVEZ frequently gave him money in exchange for EBT cards. The individual further told CS-1 that he was "gettin' high today."

148. Furthermore, as evidenced from the recording from the May 1, 2019 transaction, CS-1 interacted with an unknown male while inside LOCAL STORE 1, who told CS-1 that he also planned to sell his EBT card to ESTEVEZ in exchange for cash.

149. As recently as August 6, 2019, CS-1 has reported witnessing significantly long lines of individuals waiting outside LOCAL STORE 1 for the purpose of exchanging EBT cards for cash, controlled substances, and/or other items of value.

Toll Analysis

150. The analysis of the CO-CONSPIRATORS' telephone records conducted by law enforcement also highlights the extent of their fraudulent conduct:

a) ESTEVEZ called the New Jersey EBT customer service telephone line **1,300** times in a 4-month period between January and May 2019—significantly more than any other telephone number in his records. He also called the Pennsylvania EBT customer service more than **50** times in this same window of time.

b) GARCIA called the New Jersey EBT customer service line approximately **60** times between January 1, 2019 and May 1, 2019, and called the Pennsylvania EBT customer service line **twice** between February 20, 2019 and May 1, 2019.

c) RODRIGUEZ called the New Jersey EBT customer service line **9** times between January 1, 2019 and May 1, 2019.

d) MELO called the New Jersey EBT customer service line approximately **40** times between January 1, 2019 and May 1, 2019, and called the Pennsylvania EBT customer service line **once** on March 22, 2019.

151. A review of USDA records revealed that none of the CO-CONSPIRATORS are SNAP recipients or EBT cardholders themselves. Accordingly, I am unaware of any legitimate reason for the frequency of the CO-CONSPIRATORS' contact with the EBT customer service telephone lines.

Fraudulent Activity at Nearby Superstores

152. Additionally, records obtained by law enforcement during the course of the Investigation revealed that the CO-CONSPIRATORS—namely, ESTEVEZ and GARCIA—used hundreds of fraudulently procured EBT cards at large-scale superstores in and around Southern New Jersey, presumably for the purpose of purchasing bulk goods and food items for resale in small convenience and grocery stores owned by or affiliated with the CO-CONSPIRATORS and their associates.

153. USDA records confirm that ESTEVEZ, RODRIGUEZ, GARCIA, and MELO were not registered with SNAP and therefore were not SNAP recipients. Thus, these individuals were not provided state-issued EBT cards, and, based on my knowledge and training, I believe had no legitimate reason for possessing and using such cards.

154. The Investigation has revealed that ESTEVEZ is linked to the processing of significant amounts of EBT funds at several superstores. For example, USDA records show that:

a) ESTEVEZ maintained a membership account at SUPERSTORE 3.[8] Between on or about February 27, 2019 and on or about July 25, 2019, approximately $10,362.84 in EBT funds were processed through the membership account associated with ESTEVEZ.

b) ESTEVEZ also opened a membership account at SUPERSTORE 4. Between the approximate dates of July 9, 2018 and May 14, 2019, ESTEVEZ processed approximately $10,650.71 of EBT funds through this account.

c) ESTEVEZ also processed approximately $14,357.80 in EBT funds at SUPERSTORE 2 between approximately July 9, 2018 and May 14, 2019.[9]

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[8] As described in detail above, CS-1 and ESTEVEZ went to SUPERSTORE 3 together on February 25, 2019. The Investigation revealed that the account opened on this date listed both CS-1 and ESTEVEZ as co-members of the account.

[9] SUPERSTORE 4 shares a business relationship with SUPERSTORE 4. However, unlike SUPERSTORE 4, SUPERSTORE 2 does not require individuals to open a membership account to shop at its stores. Law enforcement was able to identify the amount of EBT funds connected to ESTEVEZ that were processed through SUPERSTORE 2 by correlating EBT cards used to make purchases in connection with ESTEVEZ's membership account at SUPERSTORE 4. In other words, if an EBT card associated with ESTEVEZ's account was also used at SUPERSTORE 4, investigators checked to see if the same EBT card was also used at SUPERSTORE 4. This analysis does not, however, account for EBT cards associated with ESTEVEZ that were only used at SUPERSTORE 2. Therefore, the amount of EBT funds associated with ESTEVEZ that were processed through SUPERSTORE 2 may actually be much higher.

Based on my training and experience, given that ESTEVEZ was not a lawful SNAP Recipient, there was no legitimate reason for his processing of **any** EBT transactions at these superstores.

155. In addition to these records obtained during the Investigation, law enforcement also obtained surveillance footage from several superstores depicting ESTEVEZ engaging in transactions.

156. Similarly, records obtained during the Investigation also show that GARCIA is linked to the processing of significant amounts of EBT funds through superstores. For example, USDA records show that:

a) GARCIA maintained 2 membership accounts at SUPERSTORE 3. Between on or about September 3, 2018 and on or about July 19, 2019, approximately $16,264.33 in EBT funds were processed through the membership accounts associated with GARCIA.

b) GARCIA or entities related to him maintained 2 membership accounts at SUPERSTORE 4. Between approximate dates of February 12, 2017 and July 1, 2019, approximately $45,634.42 in EBT funds were processed through the membership accounts associated with GARCIA.

c) Between approximately February 12, 2017 and July 1, 2019, GARCIA or entities related to him also appear to have processed approximately $52,254.65 in EBT funds at SUPERSTORE 2.[10]

Based on my training and experience, given that GARCIA was not a lawful SNAP Recipient, there was no legitimate reason for his processing of **any** EBT transactions at these superstores.

157. In addition to these records obtained during the Investigation, law enforcement also obtained surveillance footage from several superstores depicting GARCIA engaging in transactions.

158. Therefore, based on the above, at least $149,524.75 of EBT funds to date have been fraudulently processed through superstores as a result of the CO-CONSPIRATORS' conduct. Accordingly, these figures and other information obtained throughout the course of the Investigation show that the CO-CONSPIRATORS' fraudulent conduct is pervasive, extensive, and remains ongoing.

Rogue EBT Terminal at LOCAL STORE 1

159. As referenced throughout this Affidavit, during the course of the conspiracy, ESTEVEZ unlawfully procured a rogue EBT terminal, which he utilized in LOCAL STORE 1 during the course of the conspiracy. As indicated above, ESTEVEZ told CS-1 about his plans to illegally acquire a rogue EBT terminal as early as February 14, 2019 (Transaction 2) and acknowledged its illegal nature, telling CS-1: "[Y]ou know one thing? I'm trying to get a machine. Don't tell nobody nothing. I'm trying to put a machine, EBT, on the side. It's illegal. Every time you come with a card, boom, I give you the money, you know what I mean? Every day, we don't have to wait to go shopping. You gonna swipe it right then."

[10] As referenced above in Footnote 9, the amount of EBT funds associated with GARCIA that were processed through SUPERSTORE 2 may actually be much higher.

160. The Investigation revealed that the EBT terminal was documented in the USDA system as being registered to SUPERSTORE 1. However, as referenced above in Paragraphs 8-10, the government utilizes a Third-Party Processor and a Financial Intermediary to effectuate the electronic processing of SNAP benefits between SNAP beneficiaries and SNAP merchants, and ultimately SNAP merchants' bank accounts. By exploiting a point of the system in which the USDA and the Third-Party Processor and/or the Financial Intermediary systems do not synchronize, the Investigation revealed that ESTEVEZ received SNAP funds through the rogue EBT terminal rather than SUPERSTORE 1. USDA records obtained during the course of the Investigation show that approximately $110,000 of SNAP funds were run through the rogue EBT terminal.

161. Further, based on USDA records, my knowledge of the Investigation, and surveillance, I know that LOCAL STORE 1 is a small convenience store with relatively small amounts of goods and food available for sale. During the course of multiple surveillance sessions conducted by law enforcement, at no point did law enforcement observe customers leaving LOCAL STORE 1 with many bags of goods or groceries that would indicate that substantial shopping occurring at LOCAL STORE 1.

162. In comparison, other local small convenience in and around Camden, New Jersey processed significantly fewer SNAP funds during similar windows of time. For example, between April and June 2019, LOCAL STORE 1 processed an average of approximately $27,080.66 of SNAP funds per month. In comparison, other local area convenience stores in and around Camden, New Jersey processed only approximately $3,222.75 per month. During this same time period, the average transaction amount for EBT transactions at LOCAL STORE 1 was approximately $65.84. In comparison, USDA records show that local convenience stores in and around Camden, New Jersey averaged only approximately $8.30 per transaction. Based on my training and experience, given the type of store and size of LOCAL STORE 1, coupled with the fact that SNAP funds can only be used on very specific food items, it is highly unlikely that LOCAL STORE 1 lawfully processed such a significant volume of EBT funds.

OVERT ACTS

163. Accordingly, based on the above facts revealed during the Investigation, there is reason to believe that the CO-CONSPIRATORS' fraud is pervasive and indicative of an ongoing conspiracy.

164. In furtherance of the conspiracy and to effect its object, ESTEVEZ, RODRIGUEZ, GARCIA, and MELO and others, both known and unknown, committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a) On or about February 25, 2019, ESTEVEZ and GARCIA (along with CS-1) went to SUPERSTORE 3 together. At this time, a membership account was opened that was connected to ESTEVEZ and ESTEVEZ paid a membership fee, which would allow ESTEVEZ to buy items in bulk at SUPERSTORE 3 On that day, ESTEVEZ and GARCIA purchased 18 cases of baby formula at SUPERSTORE 3 using EBT cards for the purpose of reselling the baby formula at their convenience/grocery stores in Camden or to sell to their associates;

b) On or about February 25, 2019, ESTEVEZ and GARCIA (along with CS-1) went to SUPERSTORE 4 together. At this time, ESTEVEZ paid to open a membership account at SUPERSTORE 4. This membership allowed ESTEVEZ and others associated with

his membership account to buy food and goods in bulk at SUPERSTORE 4, which the Investigation showed would ultimately be resold to grocery/convenience stores in Camden, New Jersey;

c) On or about February 25, 2019, while working at LOCAL STORE 1 managed by ESTEVEZ, MELO referred CS-1 to LOCAL STORE 2 managed by RODRIGUEZ for the purpose of exchanging EBT cards for cash;

d) On or about March 6, 2019, while in LOCAL STORE 1 in the presence of MELO, ESTEVEZ exchanged 2 EBT cards for cash with CS-1 and indicated that he spoke to GARCIA who would exchange a third EBT card for cash;

e) On or about March 6, 2019, while working at LOCAL STORE 1 managed by ESTEVEZ, MELO referred CS-1 to RODRIGUEZ at LOCAL STORE 2 to exchange EBT cards for cash. At this time, MELO called RODRIGUEZ to discuss the exchange of EBT cards for cash at LOCAL STORE 2 managed by RODRIGUEZ, and then instructed CS-1 to go to LOCAL STORE 2 to exchange EBT cards for cash with RODRIGUEZ;

f) On or about March 19, 2019, while working at LOCAL STORE 1 managed by ESTEVEZ, MELO and CS-1 discussed CS-1 leaving LOCAL STORE 1 to go to LOCAL STORE 2 and exchange EBT cards for cash with RODRIGUEZ. At this time, while at LOCAL STORE 1, MELO called RODRIGUEZ to advise that CS-1 would be coming to LOCAL STORE 2;

g) Between on or about February 27, 2019 and on or about July 25, 2019, approximately $10,362.84 in EBT funds were processed through a membership account at SUPERSTORE 3 associated with ESTEVEZ, who was not a lawful SNAP Recipient;

h) Between the approximate dates of July 9, 2018 and May 14, 2019, approximately $10,650.71 of EBT funds were processed through a membership account at SUPERSTORE 4 associated with ESTEVEZ, who was not a lawful SNAP recipient;

i) Between the approximate dates of July 9, 2018 and May 14, 2019, approximately $14,357.80 of EBT funds associated with ESTEVEZ, who was not a lawful SNAP recipient, were processed at SUPERSTORE 2;

j) Between on or about September 3, 2018 and on or about July 19, 2019, approximately $16,264.33 in EBT funds were processed through membership accounts at SUPERSTORE 3 associated with GARCIA, who was not a lawful SNAP recipient;

k) Between approximate dates of February 12, 2017 and July 1, 2019, approximately $45,634.42 in EBT funds were processed through the membership accounts at SUPERSTORE 4 associated with GARCIA, who was not a lawful SNAP recipient;

l) Between approximately February 12, 2017 and July 1, 2019, GARCIA or entities related to him, none of whom were lawful SNAP recipients, processed approximately $52,254.65 in EBT funds at SUPERSTORE 2.

m) On or about March 28 2019, ESTEVEZ utilized a rogue EBT terminal at LOCAL STORE 1 that was registered to SUPERSTORE 1.