

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark III
v. :
: Mag. No. 19-3343
ANEURIS HENRIQUEZ-LOPEZ, :
ELEAZAR PERALTA, :
RIKINSON RODRIGUEZ- :
SANCHEZ, and :
FERNANDO SANTIAGO :
: **Criminal Complaint**

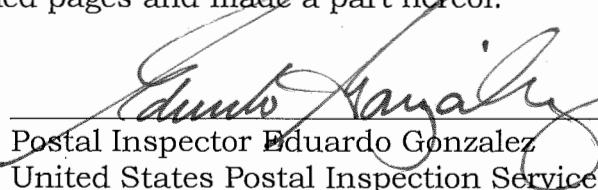
I, Postal Inspector Eduardo Gonzalez, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

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

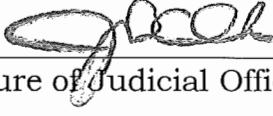
Sworn to before me and subscribed in my presence,

August 20, 2019
Date

at

Essex County, New Jersey
County and State

HONORABLE JAMES B. CLARK III
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Bank Fraud)

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

ANEURIS HENRIQUEZ-LOPEZ,
ELEAZAR PERALTA,
RICKINSON RODRIGUEZ-SANCHEZ, and
FERNANDO SANTIAGO,

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.

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 June 2018, the defendants Aneuris Henriquez-Lopez ("HENRIQUEZ-LOPEZ"), Eleazar Peralta ("PERALTA"), Rikinson Rodriguez-Sanchez ("RODRIGUEZ"), and Fernando Santiago ("SANTIAGO"), and co-conspirators, including Yerrisson Garcia-Rodriguez ("GARCIA-RODRIGUEZ"), Jerry Lake Rodriguez ("JERRY LAKE RODRIGUEZ"), Jefersson Quezada ("QUEZADA"), and Brayan Ulloa-Ulloa ("ULLOA"),¹ executed a scheme to steal checks from United States Postal Service ("USPS") blue mail collection boxes ("mail collection boxes") in Passaic, Bergen, Morris, Essex, and Middlesex Counties, and elsewhere, and to fraudulently deposit those checks into bank accounts, often within a day of being stolen. Although the checks were not made payable to the individuals in whose name the bank account was held, the actors fraudulently deposited the checks at automated teller machines ("ATMs") and then withdrew the proceeds from the accounts before the fraud was 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 third parties. Many of the accounts were used by multiple co-conspirators in furtherance of the scheme.

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

4. The conspiracy targeted dozens of mail collection boxes throughout New Jersey over the course of months. Often, checks stolen during the same mail collection box attack—and in some instances, authored by the same victim—were deposited in different bank accounts in furtherance of the conspiracy.

¹ Co-conspirators GARCIA-RODRIGUEZ, JERRY LAKE RODRIGUEZ, QUEZADA, and ULLOA were previously charged in this conspiracy and have each pled guilty.

Manner and Means of the Conspiracy

5. Through ATM surveillance recordings and other law enforcement techniques, the following defendants were identified as having deposited stolen checks and/or withdrawn cash in furtherance of the conspiracy, as more particularly described below.

HENRIQUEZ-LOPEZ

6. HENRIQUEZ-LOPEZ deposited at least three stolen checks into his bank account with number ending in 6045 (the "6045 Account"), held at a bank ("Bank-1") in or around January 2018 through in or around March 2018.

7. For example, on or about March 7, 2018, he deposited a check for approximately \$6,000 ("CHECK-1"), stolen from a mail collection box in Oakland, New Jersey, on or about that same day ("ATTACK-1"), into 6045 Account. CHECK-1 was written by VICTIM-1. Another check written by VICTIM-1 for approximately \$11,000, also stolen in ATTACK-1, was deposited into co-conspirator ULLOA's Bank-1 account number ending in 7058 (the "7058 Account"), that same day.

8. Similarly, on or about March 7, 2018, co-conspirator GARCIA-RODRIGUEZ deposited a check for approximately \$1,300 ("CHECK-2") also stolen in ATTACK-1 into a Bank-1 account in GARCIA-RODRIGUEZ's name with an account number ending in 4638 (the "4638 Account"). CHECK-2 was written by VICTIM-2. Another check written by VICTIM-2 for approximately \$600, also stolen in ATTACK-1, was deposited into a third party's Bank-1 account ending in 2561 (the "2561 Account") on or about March 8, 2018. Co-conspirator GARCIA-RODRIGUEZ withdrew money from the 2561 Account at least twice, on or about April 3, 2018 and on or about April 4, 2018.

9. HENRIQUEZ-LOPEZ also deposited a check for approximately \$3,000 ("CHECK-3") on or about February 14, 2018, stolen from a mail collection box in Livingston, New Jersey on or about February 13, 2018 ("ATTACK-2"), into his 6045 Account. CHECK-3 was written by VICTIM-3. Co-conspirator ULLOA deposited a different check written by VICTIM-3 for approximately \$8,300, also stolen in ATTACK-2, into ULLOA's 7058 Account.

SANTIAGO

10. SANTIAGO deposited at least four stolen checks into his Bank-1 account ending in number 5959 (the "5959 Account") in or around February 2018.

11. For example, he deposited a check written by VICTIM-3 for approximately \$1,400 on or about February 13, 2018, stolen in ATTACK-2, into his 5959 Account. As described above, both HENRIQUEZ-LOPEZ and ULLOA also deposited checks written by VICTIM-3 and stolen in ATTACK-2 into their respective bank accounts.

RODRIGUEZ

12. RODRIGUEZ deposited at least four stolen checks into multiple bank accounts associated with the conspiracy in or around February 2018 and in or around March 2018.

13. For example, RODRIGUEZ deposited stolen checks into GARCIA-RODRIGUEZ's 4638 Account for approximately \$900, on or about February 23, 2018, and for approximately \$200, on or about February 28, 2018. Co-conspirators GARCIA-RODRIGUEZ, QUEZADA, and JERRY LAKE-RODRIGUEZ also deposited stolen checks into the 4638 Account in furtherance of the conspiracy.

14. RODRIGUEZ deposited stolen checks into a third party's 2561 Account for approximately \$500, on or about February 16, 2018, and for approximately \$500, on or about March 19, 2018. Co-Conspirators QUEZADA and JERRY LAKE-RODRIGUEZ also deposited stolen checks into the 2561 Account in furtherance of the conspiracy.

PERALTA

15. On or about March 12, 2018, PERALTA opened a bank account in his name with account number ending in 8068 (the "8068 Account"), held at a bank ("Bank-2"), solely for the purpose of monetizing stolen checks.

16. PERALTA deposited stolen checks into his 8068 Account with co-conspirator QUEZADA on at least two occasions in or around May 2018. For example, on or about May 29, 2018, PERALTA and QUEZADA deposited a stolen check for approximately \$2,200 into PERALTA's 8068 Account.

17. Co-conspirator QUEZADA deposited at least eleven stolen checks into PERALTA's 8068 Account from in or around April 2018 through in or around June 2018.

18. Further, as detailed above, co-conspirator QUEZADA also deposited stolen checks into GARCIA-RODRIGUEZ's 4638 Account and the third party's 2561 Account 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 GARCIA-RODRIGUEZ's 4638 Account.

QUEZADA has withdrawn money from the 4638 Account at least once, including in or around March 2018. Finally, QUEZADA deposited a check for approximately \$800—stolen from the mail in Hackensack, New Jersey—into a third party’s Bank-1 account number ending in 2885 (the “2885 Account”) on or about March 21, 2018.

19. As part of the conspiracy, the defendants and others deposited the following approximate aggregate amounts into the following accounts, which constitute only a portion of the accounts involved in the scheme:

- a. \$16,000 into GARCIA-RODRIGUEZ’s 4638 Account.
- b. \$28,000 into HENRIQUEZ-LOPEZ’s 6045 Account.
- c. \$19,000 into PERALTA’s 8068 Account.
- d. \$7,000 into SANTIAGO’s 5959 Account.
- e. \$82,000 into ULLOA’s 7058 Account.
- f. \$7,000 into the 2561 Account.
- g. \$12,000 into the 2885 Account.

20. Bank-1 and Bank-2 are financial institutions, the deposits of which are insured by the Federal Deposit Insurance Corporation.

21. Law enforcement has identified at least \$450,000 of stolen checks deposited into the above-described accounts, as well as other bank accounts, as part of the conspiracy.