
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Michael A. Hammer
 :
 v. : Mag. No. 20-10143
 :
 WARREN GUERRIER, : **CRIMINAL COMPLAINT**
 a/k/a "MOO," :
 a/k/a "PIKE" :

I, John Havens, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

John Havens, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
May 19, 2020 at Newark, New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Conspiracy to Commit Wire Fraud)

From at least in or about November 2016 through in or about March 2019, in the District of New Jersey, and elsewhere, defendant,

WARREN GUERRIER,
a/k/a "MOO,"
a/k/a "PIKE"

and other unnamed coconspirators, knowingly and intentionally conspired and agreed with each other and with others to devise a scheme and artifice to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signals, pictures, and sounds, namely the specified transactions below, contrary to Title 18, United States Code, Section 1343.

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

COUNT TWO
(Aggravated Identity Theft)

In or around October 2017, in the District of New Jersey and elsewhere,
the defendant,

WARREN GUERRIER,
a/k/a "MOO,"
a/k/a "PIKE

did knowingly possess without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Section 1349, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

ATTACHMENT B

I, John Havens, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and 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 in 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. Beginning in at least November 2016 through in or about March 2019, Warren Guerrier ("GUERRIER") and others (collectively, the "Subjects") participated in a scheme to sell stolen vehicles through internet-based marketplaces. For each fraudulent transaction, the Subjects scouted out vehicles to sell at apartment complexes, hotels, or shopping centers in New Jersey, New York, Pennsylvania, Virginia, and Maryland. Once a desirable vehicle was selected, the Subjects photographed a target vehicle and attached a GPS tracker to the vehicle in order to acquire a pattern-of-life of the original owner. The Subjects then listed the target vehicles for sale on an internet-based marketplace. The Subjects then communicated with potential purchasers and, upon identifying a purchaser, scheduled a meeting time and location to meet in person. Shortly before the scheduled meeting times, the Subjects returned to the target vehicles with unlawfully obtained valet keys and stole the vehicles. The Subjects targeted mostly older model vehicles made by Honda or Acura because valet keys for such vehicles were easier to access. One of the subjects, at GUERRIER's direction, then personally met the purchasers, while posing as the original owner of the vehicle, and provided the purchasers the unlawfully obtained valet key, at least one fraudulent motor vehicle registration document, and the stolen vehicle in exchange for cash.

2. Throughout and in furtherance of the conspiracy, GUERRIER used several cellular phone devices and several phone numbers that law enforcement has identified and analyzed. Law enforcement lawfully obtained one of these cellular phone devices (the "GUERRIER Device") in or around October 2017, which contained various photographs and information about several of the target vehicles and fraudulent identities used.

3. Throughout the investigation of the conspiracy, law enforcement identified two vehicles driven by GUERRIER. The first was a silver Audi A6 bearing Virginia state registration 5615FP (the "GUERRIER Audi") and the second was a black Chrysler Town and Country van bearing New Jersey state registration T56FZW (the "GUERRIER Chrysler"). Additionally, law enforcement

identified an apartment complex in Hackensack, New Jersey (the “GUERRIER Apartment”) where GUERRIER resided during the conspiracy and until in or around January 2019 under the false name of “Michael Smith.”

4. During the course of the investigation, a law enforcement review of “cookies”¹ on the GUERRIER Device located a “cookie” for Covert Tracker, a GPS tracking company headquartered in Arizona. Pursuant to a law-enforcement request for information, Covert Tracker was able to provide some of the data associated with the account that had been accessed by the GUERRIER Device. After reviewing the data, law enforcement determined that the GPS devices monitored by the account associated with the GUERRIER Device were attached to seven vehicles that had been stolen and fraudulently resold. Law enforcement also determined that the trackers had made frequent stops in Hackensack, New Jersey, in the vicinity of the GUERRIER Apartment. Further, the GUERRIER Device contained “cookies,” which indicate visits to the GUERRIER Apartment complex’s website.

5. After obtaining a search warrant from this Court, Agents with the FBI obtained the historical cell site data for six (6) accounts used by GUERRIER over the course of the conspiracy (the “GUERRIER Cell Site Data”). Analysis of this data shows GUERRIER in the vicinity or very nearby several of the sites of the fraudulent vehicle sales.

6. Overall, the scheme to defraud involves more than thirty stolen (37) vehicles, of which twenty-nine (29) were sold to unwitting buyers, including the incidents described in more detail below. Additionally, the Suspects and GUERRIER collected approximately \$217,650 from unwitting buyers.

The Vehicle Thefts and Sales

7. On or about March 19, 2017, one of the Subjects (“Coconspirator 1”) was arrested by officers of the Woodbridge Police Department in Woodbridge, New Jersey for vehicle theft. Coconspirator 1 was found to be in possession of two (2) of the target vehicles that were photographed on the GUERRIER Device. Additionally, Coconspirator 1 told law enforcement that he was working with another individual, Coconspirator 2, to steal the vehicles. The contact information for Coconspirator 2 was found on the GUERRIER Device. Finally, the toll records for one of GUERRIER’s phone numbers identified by law enforcement revealed approximately 193 communications with a phone number associated with Coconspirator 2.

8. On or before March 30, 2017, a resident of Brooklyn, New York (“Victim 1”) observed a post on an internet-based marketplace website, which listed for sale a 2007 Acura MDX (the “2007 Acura”). Victim 1 expressed an

¹ The term “cookie” refers to a text file created in a device’s memory to reflect access to a particular website at a particular time.

interest to the purported seller of the vehicle (“Unidentified Coconspirator 1”) in purchasing the 2007 Acura and arranged a meeting time and location. On or about March 30, 2017, Unidentified Coconspirator 1 met Victim 1 in the pre-arranged location in New York to consummate the sale of the 2007 Acura. Unidentified Coconspirator 1 used a false identity, “Tyrone E. Bailey,” during the meeting and purported to be the owner of the 2007 Acura. Unidentified Coconspirator 1 provided Victim 1 with a key to the 2007 Acura and a fraudulent Certificate of Title, which was listed in the name “Tyrone E. Bailey.” Victim 1 gave Unidentified Coconspirator 1 \$8,500 in cash in exchange for the 2007 Acura. Victim 1 later learned that the title in Victim 1’s possession was fraudulent and the 2007 Acura had been stolen on or about March 28, 2017 out of Parsippany, New Jersey. The 2007 Acura was subsequently returned to its lawful owner. A photograph of the 2007 Acura was found on the GUERRIER Device. Additionally, the name and personal identifying information for “Tyrone E. Bailey” was found on the GUERRIER Device. This name has subsequently been identified as a stolen identity.

9. On or about March 29, 2017, officers with the Millburn Police Department in Millburn, New Jersey, obtained security video footage of an unknown individual disposing into a dumpster outside an office building personal property removed from the 2007 Acura. On the security video, the unknown individual is seen driving a van registered to Enterprise Rent-A-Car (the “Enterprise Van”). At the time of the incident, the van was rented in the name “Derek Fuqua.” This name has subsequently been identified as a stolen identity.

10. On or about April 14, 2017, GUERRIER was pulled over by officers with the Hackensack Police Department in Hackensack, New Jersey while driving the Enterprise Van. This same day, GUERRIER received a motor vehicle ticket while driving the Enterprise Van from the Chatham Police Department in Chatham, New Jersey, for failing to yield to a pedestrian. At that time, the rental agreement for the Enterprise Van in the name “Derek Fuqua” was still active.

11. On or before May 3, 2017, a resident of the Bronx, New York (“Victim 2”) observed a post on an internet-based marketplace website, which listed for sale a 2009 Mazda CX-7 (the “2009 Mazda”). Victim 2 expressed an interest to the purported seller of the vehicle purchasing the 2009 Mazda and arranged a meeting time and location. On or about May 3, 2017, Coconspirator 2 met Victim 2 in the pre-arranged location in Carteret, New Jersey to consummate the sale of the 2009 Mazda. Coconspirator 2 used a false identity, “Lavon Smith,” during the meeting and purported to be the owner of the 2009 Mazda. Coconspirator 2 provided Victim 2 with a fraudulent driver’s license, which Victim 2 took a photograph of and later provided to law enforcement. The fraudulent driver’s license contained the name “Lavon Smith” along with a photograph of Coconspirator 2. Coconspirator 2 provided Victim 2 with a key to the 2009 Mazda and a fraudulent Certificate of Title, which was listed in the name “Lavon

Smith.” Victim 2 gave Coconspirator 2 \$5,500 in cash in exchange for the 2009 Mazda. Victim 2 later learned that the title in Victim 2’s possession was fraudulent and the 2009 Mazda had been stolen on or about April 30, 2017 out of Orange, New Jersey. The 2009 Mazda was subsequently returned to its lawful owner. A photograph of the 2009 Mazda was found on the GUERRIER Device, as was the contact information for Coconspirator 2, as stated in paragraph 7 above.

12. On or before July 19, 2017, a resident of Lake Hiawatha, New Jersey (“Victim 3”) observed a post on the internet-based marketplace website Craigslist, which listed for sale a 2010 Acura TSX (the “2010 Acura”) for approximately \$6,000. Victim 3 expressed an interest to the purported seller (“Coconspirator 3”) of the vehicle in purchasing the 2010 Acura and arranged a meeting time and location. On or about July 19, 2017, Coconspirator 3 met Victim 3 in the pre-arranged location in Wayne, New Jersey, to consummate the sale of the 2010 Acura. Coconspirator 3 used a false identity, “Majid Harrison,” during the meeting and purported to be the owner of the 2010 Acura. Coconspirator 3 provided Victim 3 with a key to the 2010 Acura and a fraudulent Certificate of Title, which was listed in the name “Majid Harrison.” Victim 3 gave Coconspirator 3 \$6,000 in cash in exchange for the 2010 Acura, after which Victim 3 proceeded to the Division of Motor Vehicle Service (“DMV”) in Wayne, New Jersey, to re-title and register the 2010 Acura. Upon attempting to register the 2010 Acura, however, Victim 3 learned that the title in Victim 3’s possession was fraudulent and the 2010 Acura had been stolen on or about July 15, 2017 out of Paterson, New Jersey. The 2010 Acura was subsequently returned to its lawful owner. As described below in paragraph 27, cellular phone toll records indicate that Coconspirator 3 was on the phone with GUERRIER at the approximate time of the sale of the 2010 Acura.

13. Also on or before July 19, 2017, a resident of Paterson, New Jersey (“Victim 4”) observed a post on the internet-based marketplace website Craigslist, which listed for sale a 2011 Honda Accord (the “2011 Honda”) for approximately \$10,000. Victim 4 expressed an interest to the purported seller of the vehicle in purchasing the 2011 Honda and arranged a meeting time and location. On or about July 19, 2017, Coconspirator 3 met Victim 4 in the pre-arranged location in Paterson, New Jersey, to consummate the sale of the 2011 Honda. Coconspirator 3 used a false identity, again “Majid Harrison,” during the meeting and purported to be the owner of the 2011 Honda. Coconspirator 3 provided Victim 4 with a key to the 2011 Honda and a fraudulent Certificate of Title, which was listed in the name “Majid Harrison.” Victim 4 gave Coconspirator 3 \$8,500 in cash in exchange for the 2011 Honda, after which Victim 4 proceeded to the DMV in Paterson, New Jersey, to re-title and register the 2011 Honda. Upon attempting to register the 2011 Honda, however, Victim 4 learned that the title in Victim 4’s possession was fraudulent and the 2011 Honda had been stolen on or about July 18, 2017 out of Rockaway, New Jersey. The 2011 Honda was subsequently returned to its lawful owner. As described below in paragraph 27, cellular phone toll records indicate that Coconspirator 3

was on the phone with GUERRIER at the approximate time of the sale of the 2011 Honda.

14. On or before December 13, 2017, a resident of Herndon, Virginia (“Victim 5”) observed a post on the internet-based marketplace website Craigslist, which listed for sale a 2011 Acura MDX (the “2011 Acura”) for approximately \$8,000. Victim 5 expressed an interest to the purported seller of the vehicle in purchasing the 2011 Acura and arranged a meeting time and location. On or about December 13, 2017, Coconspirator 3 met Victim 5 in the pre-arranged location in Alexandria, Virginia, to consummate the sale of the 2011 Acura. Coconspirator 3 used a false identity, this time “Michael Owens,” during the meeting and purported to be the owner of the 2011 Acura. Coconspirator 3 provided Victim 5 with a key to the 2011 Acura, a Pennsylvania driver’s license listed in the name “Michael Owens,” a fraudulent Certificate of Title, which was listed in the name “Michael Owens,” and a fraudulent bank document certifying the satisfaction of a lien on the 2011 Acura. Victim 5 gave Coconspirator 3 \$8,000 in cash in exchange for the 2011 Acura. On or about December 18, 2017 Victim 5 proceeded to the DMV in Virginia to re-title and register the 2011 Acura. Upon attempting to register the 2011 Acura, however, Victim 5 learned that the title in Victim 5’s possession was fraudulent and the 2011 Acura had been stolen on or about July 15, 2017 out of Prince William County, Virginia. The 2011 Acura was subsequently returned to its lawful owner. A law enforcement review of toll records of cell phone numbers attributed to GUERRIER show that Coconspirator 3 was on the phone with GUERRIER at the approximate time of the sale of 2011 Acura to Victim 5. Additionally, the GUERRIER Cell Site Data places GUERRIER near the site of the sale of the 2011 Acura in Alexandria, Virginia at the approximate time of the sale.

15. On or about January 7, 2018, a resident of Edison, NJ (“Victim 6”) observed a post on the internet-based marketplace website Craigslist, which listed for sale a Honda Odyssey (the “Odyssey 1”). Victim 6 expressed an interest to the purported seller of the vehicle in purchasing the Odyssey 1 and requested a report on the Odyssey 1 from the website Carfax, but the purported seller of the Odyssey 1 did not have such a report. In order to obtain a report on the Odyssey 1 without paying a fee, Victim 6 posted information on the Odyssey 1 on the internet-based marketplace website E-Bay. The purported seller of the Odyssey 1 provided a fraudulent Certificate of Title and a fraudulent driver’s license to Victim 6, which were both listed in the name “Derek Fuqua.” On or about January 8, 2018, the Odyssey 1 was stolen out of Little Falls, New Jersey. The Odyssey 1 was recovered and returned to its lawful owner prior to the sale being finalized. The “Derek Fuqua” name was the same as that used for the rental of the Enterprise Van, as noted above in paragraphs 9 and 10.

16. On or before January 13, 2018, a resident of Trevoze, Pennsylvania (“Victim 7”), observed a post on an internet-based marketplace website, which listed for sale a 2013 Acura MDX (the “2013 Acura 1”). Victim 7 expressed an

interest to the purported seller of the vehicle (“Coconspirator 4”) in purchasing the 2013 Acura 1 and arranged a meeting time and location. On or about January 13, 2018, Victim 7 met Coconspirator 4 to purchase the 2013 Acura 1 at the pre-arranged meeting spot in Woodland Park, New Jersey. Coconspirator 4 used a false identity, “Derek Fuqua,” during the meeting and purported to be the owner of the 2013 Acura 1. Coconspirator 4 provided Victim 7 with two keys to the 2013 Acura 1 and a fraudulent Certificate of Title, which was listed in the name “Derek Fuqua.” Coconspirator 4 also provided Victim 7 with a fraudulent bank form certifying the satisfaction of a lien that was on the 2013 Acura 1. Victim 7 gave Coconspirator 4 \$14,700 in cash in exchange for the 2013 Acura 1. On or before March 10, 2018, Victim 7 went to the DMV in Bensalem, Pennsylvania, to re-title and register the 2013 Acura 1. Upon attempting to register the 2013 Acura 1, however, Victim 7 learned that the title in Victim 7’s possession was fraudulent and the 2013 Acura 1 had been stolen on or about January 13, 2018 out of Teaneck, New Jersey. The 2013 Acura 1 was returned to its lawful owner. The fraudulent title used here listed the same driver’s license number as was on the application for the Enterprise Van, as noted above in paragraphs 9 and 10.

17. On or before January 27, 2018, a resident of Hackensack, New Jersey (“Victim 8”), observed a post on an internet-based marketplace website, which listed for sale a 2016 Honda Accord (the “2016 Honda 1”). Victim 8 expressed an interest to the purported seller of the vehicle in purchasing the 2016 Honda 1 and arranged a meeting time and location. On or about January 27, 2018, Victim 8 met Coconspirator 4 to purchase the 2016 Honda 1 at the pre-arranged meeting spot in Wood-Ridge, New Jersey. Coconspirator 4 used a false identity, again “Derek Fuqua,” during the meeting and purported to be the owner of the 2016 Honda 1. Coconspirator 4 provided Victim 8 with two keys to the 2016 Honda 1 and a fraudulent Certificate of Title, which was listed in the name “Derek Fuqua.” Coconspirator 4 also provided a fraudulent bank form certifying the satisfaction of a lien that was on the 2016 Honda 1. Victim 8 gave Coconspirator 4 \$13,700 in cash in exchange for the 2016 Honda 1 and then proceeded to the DMV in Yonkers, New York, to re-title and register the 2016 Honda 1. Upon attempting to register the 2016 Honda 1, however, Victim 8 learned that the title in Victim 8’s possession was fraudulent and the 2016 Honda 1 had been stolen on or about January 25, 2018 out of Teaneck, New Jersey. The 2016 Honda 1 was returned to its lawful owner. The “Derek Fuqua” name was the same as that used for the rental of the Enterprise Van, as noted above in paragraphs 9 and 10.

18. On or about April 17, 2018, a resident of New York (“Victim 9”), observed a post on the internet-based marketplace website Craigslist, which listed for sale a 2013 Acura MDX (the “2013 Acura 2”) for approximately \$16,500. Victim 9 expressed an interest to the purported seller of the vehicle (“Coconspirator 5”) in purchasing the 2013 Acura 2 and arranged a meeting time and location. On or about April 21, 2018, Victim 9 met Coconspirator 5 to

purchase the 2013 Acura 2 at the pre-arranged meeting spot in Willingboro, New Jersey. Coconspirator 5 used a false identity, "Travis Allen Hunter," during the meeting and purported to be the owner of the 2013 Acura 2. Coconspirator 5 provided Victim 9 with two keys to the 2013 Acura 2 and a fraudulent Certificate of Title, which was listed in the name "Travis Allen Hunter." Victim 9 gave Coconspirator 5 \$15,000 in cash in exchange for the 2013 Acura 2. On or about April 24, 2018, Victim 9 searched the website Carfax for information on the 2013 Acura 2 and received an alert reporting the vehicle as stolen. The 2013 Acura 2 was returned to its lawful owner. Law enforcement has subsequently obtained surveillance video footage of GUERRIER walking away from the site of the sale of the 2013 Acura 2. Additionally, surveillance video footage also shows the GUERRIER Chrysler nearby the site of the sale of the 2013 Acura 2. Finally, the GUERRIER Cell Site Data places GUERRIER near the site of the sale of the 2013 Acura 2 in Willingboro, New Jersey at the approximate time of the sale.

19. On or about August 25, 2018, a resident of Maryland ("Victim 10"), observed a post on the internet-based marketplace website OfferUp.com, which listed for sale a 2016 Honda Accord (the "2016 Honda 2"). Victim 10 expressed an interest to the purported seller of the vehicle ("Unidentified Coconspirator 2") in purchasing the 2016 Honda 2 and arranged a meeting time and location. On or about August 26, 2018, Victim 10 met with Unidentified Coconspirator 2 at the pre-arranged location in Woodbridge, Virginia to discuss the sale of the 2016 Honda 2. On or about August 27, 2018, Victim 10 again met Unidentified Coconspirator 2 to purchase the 2016 Honda. Unidentified Coconspirator 2 used a false identity, "Mona R Watts," during the meeting and purported to be the owner of the 2016 Honda 2. Unidentified Coconspirator 2 produced a fraudulent Pennsylvania driver's license depicting the name "Mona R Watts," and provided Victim 10 with two keys to the 2016 Honda 2, a fraudulent Certificate of Title, which was listed in the name "Mona R Watts," and the same fraudulent bank document certifying the satisfaction of a lien that the Subjects had previously provided to victims, as noted above in paragraphs 16 and 17. Victim 10 gave Unidentified Coconspirator 2 \$11,000 in cash in exchange for the 2016 Honda 2. On or about August 31, 2018, Victim 10 proceeded to the DMV in Maryland, to re-title and register the 2016 Honda 2. Upon attempting to register the 2016 Honda 2, however, Victim 10 learned that the title in Victim 10's possession was fraudulent and the 2016 Honda 2 had been stolen. The 2016 Honda 2 was returned to its lawful owner. The "Mona Watts" identity used here was the same as the victim of another vehicle theft by the Suspects.

20. On or before September 3, 2018, a resident of a resident of Maryland ("Victim 11"), observed a post on the internet-based marketplace website Craigslist, which listed for sale a 2013 Acura MDX (the "2013 Acura 3"). Victim 11 expressed an interest to the purported seller of the vehicle in purchasing the 2013 Acura 3 and arranged a meeting time and location. On or about September 3, 2018, Victim 11 met Unidentified Coconspirator 2 to purchase the 2013 Acura 3 at the pre-arranged meeting spot in Prince William County, Maryland.

Unidentified Coconspirator 2 used a false identity, again “Mona R Watts,” during the meeting and purported to be the owner of the 2013 Acura 3. Unidentified Coconspirator 2 provided Victim 11 with a key to the 2013 Acura 3, a fraudulent Certificate of Title, which was listed in the name “Mona R Watts,” and the same fraudulent bank document certifying the satisfaction of a lien that the Subjects had previously provided to victims, as noted above in paragraphs 16 and 17. Victim 11 gave Unidentified Coconspirator 2 \$11,000 in cash in exchange for the 2013 Acura 3 and then proceeded to the DMV in Maryland to re-title and register the 2013 Acura. Upon attempting to register the 2013 Acura 3, however, Victim 11 learned that the title that was in Victim 11’s possession was fraudulent and the 2013 Acura 3 had been stolen. The 2013 Acura 3 was returned to its lawful owner. The “Mona Watts” identity used here was the same as the victim of another vehicle theft by the Suspects.

21. On or before October 22, 2018, a resident of the Bronx, New York (“Victim 12”), observed a post on an internet-based marketplace website, which listed for sale a 2012 Acura MDX (the “2012 Acura”). Victim 12 expressed an interest to the purported seller of the vehicle in purchasing the 2012 Acura and arranged a meeting time and location. Victim 12 met Coconspirator 3 at the pre-arranged location in Piscataway, New Jersey to purchase the 2012 Acura. Coconspirator 3 used a false identity, this time “Mahmoud Badr,” and purported to be the owner of the 2012 Acura. Coconspirator 3 provided Victim 12 with keys to the 2012 Acura and a fraudulent Certificate of Title, which was listed in the name “Mahmoud Badr.” Victim 12 gave Coconspirator 3 \$14,000 in cash in exchange for the 2012 Acura, after which Victim 12 proceeded to his home in New York. Upon examining the title more, Victim 12 noticed that it appeared to be fraudulent and contacted law enforcement, who confirmed that the title was fraudulent and the 2012 Acura had been stolen on or about October 22, 2018 out of the New Jersey Transit Station in Edison, New Jersey. The 2012 Acura was returned to its lawful owner. A law enforcement review of toll records of cell phone numbers attributed to GUERRIER show that Coconspirator 3 was on the phone with GUERRIER at the approximate time of the sale of 2012 Acura to Victim 12. Finally, the GUERRIER Cell Site Data places GUERRIER near the site of the sale of the 2012 Acura in Piscataway, New Jersey at the approximate time of the sale and near the theft of the 2012 Acura in Edison, New Jersey at the approximate time of the theft.

22. On or before November 5, 2018, a resident of Roxbury, New Jersey (“Victim 13”), observed a post on an internet-based marketplace website, which listed for sale a Honda Odyssey (the “Odyssey 2”). Victim 13 expressed an interest to the purported seller of the vehicle (“Unidentified Coconspirator 3”) in purchasing the Odyssey 2 and arranged a meeting time and location. Victim 13 sent an employee to meet with Unidentified Coconspirator 3 at the pre-arranged location in Bound Brook, New Jersey to purchase the Odyssey 2. Unidentified Coconspirator 3 used a false identity, “Mahmoud Badr,” and purported to be the owner of the Odyssey 2. Unidentified Coconspirator 3 provided Victim 13’s

employee with keys to the Odyssey 2 and a fraudulent Certificate of Title, which was listed in the name "Mahmoud Badr." Victim 13's employee gave Unidentified Coconspirator 3 \$12,500 in cash in exchange for the Odyssey 2, after which Victim 13's employee proceeded to deliver the Odyssey 2 to Victim 13. Upon examining the title, Victim 13 noticed that it appeared to be fraudulent and contacted the Roxbury Police Department, who confirmed that the title was fraudulent and the Odyssey 2 had been stolen on or about November 4, 2018 out of Bridgewater Township, New Jersey. The Odyssey 2 was returned to the lawful owner of the Odyssey 2. Finally, the GUERRIER Cell Site Data places GUERRIER near the site of the sale of the Odyssey 2 in Bound Brook, New Jersey at the approximate time of the sale.

23. On or before November 23, 2018, a resident of Clifton, New Jersey ("Victim 14"), observed a post on the internet-based marketplace website OfferUp, which listed for sale a 2015 Honda Accord (the "2015 Honda") for approximately \$12,000. Victim 14 expressed an interest to the purported seller of the vehicle in purchasing the 2015 Honda and arranged a meeting time and location. On or about November 23, 2018, Victim 14 and another individual ("Victim 15") met with Coconspirator 3 at the pre-arranged location in Bound Brook, New Jersey to purchase the 2015 Honda. Coconspirator 3 again used a false identity, this time "Michael Owens," produced a Pennsylvania license depicting his photograph and the name "Michael Owens," and purported to be the owner of the 2015 Honda. Coconspirator 3 provided Victim 14 and Victim 15 with two keys to the 2015 Honda and a fraudulent Certificate of Title, which was listed in the name "Michael Owens." Victim 14 and Victim 15 gave Coconspirator 3 \$12,000 in cash in exchange for the 2015 Honda, after which Victim 14 and Victim 15 proceeded to the DMV in Somerville, New Jersey, to re-title and register the 2015 Honda. Upon attempting to register the 2015 Honda, however, Victim 14 and Victim 15 learned that the title was fraudulent and the 2015 Honda had been stolen. The 2015 Honda was returned to its lawful owner. The Pennsylvania driver's license that was used here appears to be the same as was used in the sale of the 2011 Acura, as described above in paragraph 14.

24. On or about December 22, 2018, a resident of Teaneck, New Jersey ("Victim 16") reported the theft of their 2013 Ford Explorer (the "2013 Ford"). Officers with the Teaneck Police Department investigating the theft of the 2013 Ford identified video surveillance footage, which shows the GUERRIER Audi dropping off an unknown male who then breaks into, and then exits, the 2013 Ford on or about December 4, 2018. The 2013 Ford was posted for sale on Craigslist, but does not appear to have been sold.

25. Additionally on or about December 22, 2018, a resident of Ridgewood, New York ("Victim 17"), observed a post on Craigslist, which listed for sale a black 2016 Honda Accord (the "2016 Honda 3") for approximately \$14,000. Victim 17 expressed an interest to the purported seller of the vehicle in purchasing the 2016 Honda 3, and arranged a meeting time and location. On

or about December 23, 2018, Coconspirator 3 met Victim 17, along with Victim 17's father, in Union City, New Jersey to inspect the 2016 Honda 3. Coconspirator 3 used a false identity, this time "Jerome Montgomery," during the meeting and purported to be the owner of the 2016 Honda 3. At this time, Victim 17 and Victim 17's father reported to law enforcement that a car matching the description of the GUERRIER Audi was circling the area they were at. On or about December 24, 2018, Coconspirator 3 met Victim 17, along with Victim 17's father, in Union City, New Jersey to consummate the sale of the 2016 Honda 3. Coconspirator 3 provided Victim 17 with the key to the 2016 Honda 3 and a fraudulent Certificate of Title and Bill of Sale. Victim 17 gave Coconspirator 3 \$11,000 in cash in exchange for the 2016 Honda 3. On or about December 28, 2018, Victim 17 went to the DMV in New Jersey to re-title and register the 2016 Honda 3. Upon attempting to register the 2016 Honda 3, however, Victim 17 and Victim 17's father learned that the title was fraudulent and the 2016 Honda 3 had been stolen out of Piscataway, New Jersey. The 2016 Honda 3 was subsequently returned to its lawful owners. Law enforcement reviewed video surveillance footage of the sale of the 2016 Honda 3, which shows the GUERRIER Audi exiting a parking space in a public parking lot in Union City, New Jersey so that the 2016 Honda 3 could pull in to the space. Further, a law enforcement review of toll records of cell phone numbers attributed to GUERRIER show that Coconspirator 3 was on the phone with GUERRIER at the approximate time of the sale of 2016 Honda 3 to Victim 17. Finally, the GUERRIER Cell Site Data places GUERRIER near the site of the sale of the 2016 Honda 3 in Union City, New Jersey at the time of the sale.

26. On or about March 22, 2019, a resident of Chesterfield, Virginia ("Victim 18"), observed a post on Craigslist, which listed for sale a 2016 Honda Accord (the "2016 Honda 4") for approximately \$12,000. Victim 18 expressed an interest to the purported seller of the vehicle in purchasing the 2016 Honda 4, and arranged a meeting time and location. On or about March 24, 2019, Coconspirator 3 met Victim 18 in Alexandria, Virginia to consummate the sale of the 2016 Honda 4. Coconspirator 3 purported to be the owner of the 2016 Honda 4. Coconspirator 3 provided Victim 18 with the key to the 2016 Honda 4 and a fraudulent Certificate of Title and Bill of Sale. Victim 18 gave Coconspirator 3 \$12,000 in cash in exchange for the 2016 Honda 4, after which Victim 18 drove the 2016 Honda 4 back to his home in Chesterfield, Virginia. Afterwards, Victim 18 sought out law enforcement to confirm that the Vehicle Identification Number was clear. Upon doing so, Victim 18 learned that the title was fraudulent and the 2016 Honda 4 had been stolen on or about March 24, 2019 out of Woodbridge, Virginia. The 2016 Honda 4 was subsequently returned to its lawful owner.

27. A law enforcement analysis of cellular phone toll records indicated that in some cases, GUERRIER and the coconspirators conducting the sale were on the phone at the time of the sale. Footage obtained by one victim who recorded a fraudulent sale shows an iPhone earpiece in the coconspirator's ear.

Likewise, a security-camera image of another coconspirator showed the coconspirator with an iPhone earpiece in his ear. Analysis of toll records at the approximate times also suggests that GUERRIER was on the phone with Coconspirator 3 during at least five of the fraudulent sales.

28. In order to be viewed in New Jersey, New York, Maryland, and Virginia, the Craigslist and OfferUp posts set forth above were transmitted in interstate commerce by means of wire communications.