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

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UNITED STATES OF AMERICA : Hon. Cathy L. Waldor, U.S.M.J.  
 :  
 v. : Mag. No. 20-9374 (CLW)  
 :  
 NICHOLAS BEAUCHENE : **CRIMINAL COMPLAINT**  
 :

I, Steven Vargas, 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 United States Postal Service – Office of the Inspector General, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:



Special Agent Steven Vargas  
United States Postal Service  
Office of the Inspector General

Attested to by telephone pursuant to  
Fed. R. Crim. P. 4.1 on October 6, 2020  
in the District of New Jersey

HONORABLE CATHY L. WALDOR  
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

**ATTACHMENT A**

**COUNT 1**

Between on or about September 28, 2020 and on or about October 2, 2020, in Essex County, in the District of New Jersey and elsewhere, defendant

NICHOLAS BEAUCHENE,

a Postal Service officer or employee, did unlawfully secrete, detain, and delay, letters, postal cards, and mail entrusted to him and which came into his possession, and which was intended to be conveyed by mail, and carried and delivered by any carrier or other employee of the Postal Service, or forwarded through or delivered from any post office or station thereof established by authority of the Postmaster General or the Postal Service.

In violation of Title 18, United States Code, Sections 1703(a) and 2.

**COUNT 2**

Between on or about September 28, 2020 and on or about October 2, 2020, in Essex County, in the District of New Jersey and elsewhere, defendant

NICHOLAS BEAUCHENE

did knowingly and willfully obstruct and retard the passage of the mail.

In violation of Title 18, United States Code, Sections 1701 and 2.

## **ATTACHMENT B**

I, Steven Vargas, a Special Agent with the United States Postal Service – Office of the Inspector General, having personally participated in an investigation of the conduct of defendant NICHOLAS BEAUCHENE (“BEAUCHENE”), and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the actions, statements, and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated.

1. Between in or about July 2020 and on or about October 2, 2020, BEAUCHENE was employed by the United States Postal Service (“USPS”) as a City Carrier Assistant out of the Orange Main United States Post Office located in Orange, New Jersey (“Orange USPO”). BEAUCHENE was a resident of Kearny, New Jersey.

2. On or about October 2, 2020, a large quantity of United States mail directed to addresses within West Orange, New Jersey (the “Recovered Mail-1”) was found in a dumpster outside a bank in North Arlington, New Jersey (the “North Arlington Dumpster”) that is located approximately one mile from BEAUCHENE’s residence. Recovered Mail-1 included approximately 249 First Class pieces of mail, approximately 494 standard class pieces of mail, approximately 98 general election ballots from the Essex County Clerk’s Office to registered voters, and approximately 139 pieces of political mail, including campaign flyers from local candidates for West Orange Town Council.

3. Based on an analysis of Recovered Mail-1, Recovered Mail-1 consisted of mail from two postal routes on two different scheduled delivery days. Specifically, a portion of Recovered Mail-1 was scheduled for delivery to Postal Route 79 on or about September 28, 2020. Another portion of Recovered Mail-1 was scheduled for delivery to Postal Route 50 on or about October 1, 2020. Postal Route 79 and Postal Route 50 are both serviced out of the Orange USPO and cover areas of West Orange.

4. On or about September 28, 2020, BEAUCHENE was the only mail carrier assigned to deliver mail to Postal Route 79. On or about October 1, 2020, BEAUCHENE was the only mail carrier assigned to deliver mail to Postal Route 50.

5. On or about October 5, 2020, a quantity of United States mail directed to addresses within Orange, New Jersey (“Recovered Mail-2”) was

found in the North Arlington Dumpster. Recovered Mail-2 included approximately 277 pieces of First Class mail, approximately 273 pieces of standard class mail, and approximately two pieces of Certified Mail. There were no election ballots or political mail found in Recovered Mail-2.

6. Based on an analysis of Recovered Mail-2, Recovered Mail-2 consisted of mail that was scheduled for delivery on or about October 2, 2020, to a specific section of Postal Route 7, which is serviced out of the Orange USPO and covers an area within Orange, New Jersey.

7. On October 2, 2020, BEAUCHENE was the only mail carrier assigned to deliver mail to the section of Route 7 to which all of Recovered Mail-2 was directed.

8. On or about October 5, 2020, multiple bundles of United States mail directed to addresses within West Orange ("Recovered Mail-3") were found in a dumpster outside a restaurant in West Orange (the "West Orange Dumpster"). Recovered Mail-3 included approximately 101 pieces of First Class mail, approximately 106 pieces of standard class mail, one general election ballot from the Essex County Clerk's Office to a registered voter, and approximately 137 pieces of political mail, including campaign flyers from local candidates for West Orange Town Council and Board of Education.

9. Based on an analysis of Recovered Mail-3, Recovered Mail-3 consisted of mail that was scheduled for delivery on or about October 2, 2020, to Postal Route 50, which is serviced out of the Orange USPO and covers an area of West Orange.

10. On October 2, 2020, BEAUCHENE was the only mail carrier assigned to deliver mail to Postal Route 50.

11. Copies of Recovered Mail-1, Recovered Mail-2, and Recovered Mail-3 were made to retain as evidence, and Recovered Mail-1, Recovered Mail-2, and Recovered Mail-3 were placed back in the mail stream for delivery to their intended recipients.