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

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UNITED STATES OF AMERICA	:	Hon. Leda Dunn Wettre
	:	
v.	:	Mag. No. 19-30045
	:	
JOSE LOPEZ BLANCO,	:	Superseding Complaint
JESUS EMILIO RUIZ RAMIREZ,	:	
CORI MOJICA CAMINERO,	:	
MARISOL GOMEZ, and	:	
DAURY DELEON	:	

I, Ryan Gale, 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 Ryan Gale  
United States Postal Inspection Service

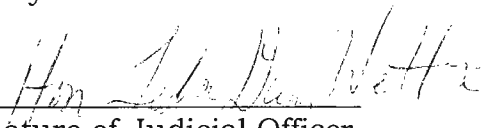
Attested to by the affiant in accordance with the requirements of Fed. R. Crim. P. 4.1(b)(2)(A) by telephone.

December 7, 2020  
Date

at

Essex County, New Jersey  
County and State

HONORABLE LEDA DUNN WETTRE  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Mail Theft)

From at least as early as in or around October 2018 through at least in or around December 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

JOSE LOPEZ BLANCO,

did knowingly steal, take, and abstract, and by fraud and deception did obtain, and attempt to obtain, from and out of any mail, post office, or station thereof, letter box, mail receptacle, and any mail route or other authorized depository for mail matter, to wit, a post office mail collection box, located at 243 Broadway, Newark, NJ, 07104, any letter, postal card, package, bag, or mail.

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

**COUNT TWO**

(Unlawful Possession of a Postal Key)

On or about December 30, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

JOSE LOPEZ BLANCO,

did knowingly and willfully possess any key suited to any lock adopted by the Postal Service and in use on any authorized receptacle for the deposit or delivery of mail matter with the intent unlawfully and improperly to use the same.

In violation of Title 18, United States Code, Sections 1704 and 2.

**COUNT THREE**

(Conspiracy to Commit Bank Fraud)

From at least as early as in or around October 2018 through at least in or around December 2019, in Essex County, in the District of New Jersey and elsewhere, the defendants,

JOSE LOPEZ BLANCO,  
JESUS EMILIO RUIZ RAMIREZ,  
CORI MOJICA CAMINERO,  
MARISOL GOMEZ, and  
DAURY DELEON,

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, Ryan Gale, 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**

#### **A. Background**

1. From at least in or around October 2018 through in or around December 2019, the United States Postal Inspection Service ("USPIS") has been investigating a group of individuals that have been: (1) stealing checks and money orders from the mail; (2) altering those financial instruments; (3) depositing them into bank accounts; and (4) withdrawing the proceeds before the victims discover the fraud.

2. At all times relevant to this Complaint:

a. Bank-1 is a financial institution whose deposits are insured by the Federal Deposit Insurance Company. Bank-1 has headquarters in Massachusetts and has branches throughout New Jersey.

b. Bank-2 is a financial institution whose deposits are insured by the Federal Deposit Insurance Company. Bank-2 has headquarters in Cherry Hill, New Jersey and has branches throughout New Jersey.

c. Bank-3 is a financial institution whose deposits are insured by the Federal Deposit Insurance Company. Bank-3 has headquarters in Virginia and has branches throughout New Jersey.

d. Bank-4 is a financial institution whose deposits are insured by the Federal Deposit Insurance Company. Bank-4 has headquarters in North Carolina and has branches throughout New Jersey.

e. Bank-5 is a financial institution whose deposits are insured by the Federal Deposit Insurance Company. Bank-5 has headquarters in Buffalo, New York and has branches throughout New Jersey.

f. Bank-6 is a financial institution whose deposits are insured by the Federal Deposit Insurance Company. Bank-6 has headquarters in Rhode Island and has branches throughout New Jersey.

g. Bank-7 is a financial institution whose deposits are insured by the Federal Deposit Insurance Company. Bank-7 has headquarters in New York, New York.

h. Account Holder-1 is the owner of a bank account at Bank-1.

i. Account Holder-2 is the owner of a bank account at Bank-4.

j. Victim-1 is the owner of Money Order-1, which was altered and then fraudulently deposited into an account at Bank-1.

k. Victim-2 is the owner of Money Order-2, which was altered and then fraudulently deposited into an account at Bank-1.

l. Victim-3 is the owner of Check-1, which was altered and then fraudulently deposited into an account at Bank-2.

m. Victim-4 is the owner of Check-2, which was altered and then fraudulently deposited into an account at Bank-3.

n. Victim-5 is the owner of Check-3, which was altered and then fraudulently deposited into an account at Bank-3.

o. Victim-6 is the owner of Check-4, which was altered and then fraudulently deposited into an account at Bank-4.

p. Victim-7 is the owner of Money Order-3, which was altered and then fraudulently deposited into an account at Bank-6.

q. Victim-8 is the owner of Money Order-4, which was altered and then fraudulently deposited into an account at Bank-2.

r. Victim-9 is the owner of Money Order-5, which was altered and then fraudulently deposited into an account at Bank-2.

s. Individual-1 is a co-conspirator, who aided BLANCO in the commission of mail theft.

t. Individual-2 is a co-conspirator, who aided BLANCO in the commission of mail theft.

u. Individual-3 is an uncharged co-conspirator, who deposited Check-3 into an account at Bank-3.

## **B. Mail Theft**

3. In or around October 2018, the USPS began receiving numerous complaints from New Jersey residents regarding the theft of their mail that they had previously deposited in United States Postal Service ("USPS") blue mail collection boxes ("mail collection boxes") in Newark (Essex County, New Jersey), and other locations in the District of New Jersey, and elsewhere.

4. The investigation has revealed that defendant Jose Lopez Blanco ("BLANCO") and others have stolen mail from USPS mail collection boxes by either inserting an object inside the mailbox to improperly remove mail, or by using a mail collection box "arrow" key ("arrow key")<sup>1</sup> to gain unauthorized access to the entirety of the mail contained within the mail collection boxes.

5. The investigation has further revealed that following various thefts from mail collections boxes, BLANCO, Jesus Emilio Ruiz Ramirez ("RUIZ-RAMIREZ"), Cori Mojica Caminero ("CAMINERO"), Marisol Gomez ("GOMEZ"), and Daury DeLeon ("DELEON") (collectively, "the defendants"), and other known and unknown individuals ("co-conspirators"), deposited various stolen and altered checks and money orders (collectively, the "Stolen Financial Instruments") into accounts that they controlled, as well as accounts controlled by co-conspirators. The defendants and co-conspirators withdrew the stolen proceeds shortly thereafter.

6. Law enforcement has obtained video surveillance, which reveals that defendant BLANCO gained unauthorized access to a USPS mail collection box located at 243 Broadway, Newark, NJ, 07104 (hereinafter referred to as the "Broadway Collection Box"), and removed various parcels of mail from said box on or about each of the following dates: November 4, 2019, November 11, 2019, December 2, 2019, December 16, 2019, and December 30, 2019.

7. On or about December 30, 2019, BLANCO was observed by law enforcement entering what appeared to be an arrow key into the Broadway Collection Box, and gaining immediate access to said box. After opening the Broadway Collection Box, BLANCO emptied the mail into a cloth bag that he

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<sup>1</sup> An arrow key is a special master key maintained by USPS employees that opens mail collection boxes, postal relay boxes (i.e., green metal boxes on streets that serve as storage for mail), and certain residential mailboxes in apartment buildings and at business addresses. An arrow key is capable of unlocking multiple collection boxes, and each arrow key is assigned a specific number.

was carrying, while two co-conspirators ("Individual-1 and Individual-2") were observed keeping visual surveillance of BLANCO and the immediate vicinity.

8. Immediately after BLANCO removed the mail from the Broadway Collection Box, law enforcement observed BLANCO, Individual-1, and Individual-2 walk to a vehicle parked in the vicinity of the Broadway Collection Box. Law enforcement immediately approached the group and searched the vehicle upon consent of the vehicle owner. During the search, law enforcement observed on the floor in front of the front passenger seat the bag that they observed BLANCO carrying. The bag contained approximately 50 parcels of USPS mail. Additionally, law enforcement recovered an arrow key that was wedged into the headrest of the passenger seat, in the immediate vicinity of BLANCO.

9. Law enforcement confirmed that the arrow key recovered from BLANCO and his co-conspirators was capable of opening all mail collection boxes located within the confines of zip code 07104, the zip code assigned to a particular portion of the City of Newark, NJ.

10. Law enforcement also confirmed that BLANCO was not an employee of the USPS nor did he have permission or authority to possess the arrow key described above.

### **C. Goal of the Bank Fraud Conspiracy**

11. It was the goal of the conspiracy for the defendants and co-conspirators to obtain and deposit the Stolen Financial Instruments into bank accounts they owned or controlled and then withdraw the fraudulent proceeds thereafter in order to unlawfully enrich themselves.

12. It was part of the conspiracy that defendant BLANCO and the co-conspirators would obtain the Stolen Financial Instruments, and then would generally manipulate or alter them to make the Stolen Financial Instruments payable to themselves and to others.

13. It was also part of the conspiracy that the co-conspirators deposited the Stolen Financial Instruments into accounts that they either already owned or accounts that were opened by the co-conspirators, in some cases, solely for the purpose of receiving and depositing the Stolen Financial Instruments (the "Accounts").

14. Shortly after each Stolen Financial Instrument was deposited (usually on or about the same day), the co-conspirators withdrew money from the Accounts via automated teller machines ("ATMs").



15. As a result, the defendants and co-conspirators collectively deposited more than \$250,000 worth of Stolen Financial Instruments into the Accounts.

16. Law enforcement officers obtained video surveillance footage from various banks where the Stolen Financial Instruments had been deposited, which reveal that on at least 50 occasions the defendants and co-conspirators collectively deposited or made fraudulent withdrawals of Stolen Financial Instruments from the Accounts.

#### **D. Manner and Means of the Conspiracy**

17. As mentioned above, through ATM surveillance recordings and other law enforcement techniques, the defendants have been specifically identified as having deposited stolen money orders and checks, as more particularly described below.

#### **BLANCO:**

18. In or around March 2019, BLANCO deposited stolen money orders into at least one bank account on at least two occasions. For example, on or about March 12, 2019, BLANCO deposited an altered money order for \$591.00 (Money Order-1) into a third party's ("Account Holder-1") Bank-1 account, ending in 0764 ("the 0764 Account").

19. The investigation has revealed that Account Holder-1 opened the 0764 Account at the request of BLANCO, and subsequently provided BLANCO with the account debit card and pin number.

20. Law enforcement obtained a fraud affidavit filed by Victim-1, the owner of Money Order-1. Victim-1 reported that the payee information on the money order was altered without Victim-1's permission or authority, to reflect the name of Account Holder-1 as the new payee, and the money order never made it to its intended recipient.

21. Bank video surveillance reveals that on or about March 29, 2019, BLANCO deposited an altered money order for \$219.00 (Money Order-2) into the 0764 Account.

22. Law enforcement obtained a fraud affidavit filed by Victim-2, the owner of Money Order-2, which indicates that Victim-2 placed the money order into a mail collection box in Newark on or about March 27, 2019, that the payee information on the money order was altered without Victim-2's permission or authority to reflect the name of Account Holder-1 as the new payee, and the money order never made it to its intended payee.

23. Bank records reveal that approximately \$8,604.87 was fraudulently deposited into the 0764 Account, and a significant portion of that money was subsequently withdrawn from the account. Bank video surveillance reveals that BLANCO withdrew money from the 0764 Account on multiple occasions.

24. At least one of the financial instruments deposited into the 0764 Account was reported stolen after being deposited into the Broadway Collection Box between in or around October 2018 through in or around December 2019.

***RUIZ-RAMIREZ:***

25. Bank video surveillance reveals that RUIZ-RAMIREZ deposited stolen checks and/or money orders into more than 5 separate accounts held by various individuals on at least 10 occasions.

26. For example, on or about September 4, 2019, RUIZ-RAMIREZ deposited an altered stolen check for approximately \$1,265.00 (Check-1) into a third party's Bank-2 account ending in 4252 ("the 4252 Account").

27. Law enforcement obtained a fraud affidavit filed by Victim-3, the owner of Check-1, which indicates that after Victim-3 placed Check-1 in a mail collection box, the payee information was altered without Victim-3's permission or authority, and that the money order never made it to its intended recipient.

28. Bank surveillance video reveals that RUIZ-RAMIREZ withdrew money from the 4252 Account at least twice, including on or about September 4, 2019 and September 13, 2019. Bank records reveal that approximately \$16,615 was fraudulently deposited into the 4252 Account, and a significant portion of that money was subsequently withdrawn from the account.

29. On or about October 31, 2019, RUIZ-RAMIREZ fraudulently deposited a Stolen Check in the amount of \$860.77 (Check-2) into a third party's Bank-3 account ending in 3519 ("the 3519 Account").

30. The investigation has revealed that after Victim-4, the owner of Check-2, placed Check-2 in the mail, the payee name was altered and the check did not make it to its final destination.

31. Bank surveillance video reveals that on or about each of the following dates, RUIZ-RAMIREZ withdrew money from the 3519 Account via ATM withdrawals: November 4, 2019, November 5, 2019, and November 6, 2019.

32. Bank video surveillance reveals that on or about November 8, 2019, Individual-3 fraudulently deposited an altered check in the amount of \$1,750.00 (Check-3), into the 3519 Account.

33. The investigation has revealed that after Victim-5, the owner of Check-3, deposited Check-3 into the Broadway Collection Box sometime between in or around November 2, 2019 and November 4, 2019, the payee name was altered without Victim-5's permission or authority, and the check never made it to its intended recipient.

34. On or about September 10, 2019, RUIZ-RAMIREZ fraudulently deposited an altered check in the amount of \$990.34 (Check-4) into a third party's Bank-4 account ending in 9793 ("the 9793 Account"), which was opened in Account Holder-2's name.

35. Law enforcement obtained a police report filed by Victim-6, the owner of Check-4, wherein Victim-6 reported Check-4 stolen. In the report, Victim-6 reported that Victim-6 placed Check-4 in a mailbox in Jersey City, New Jersey, and that thereafter the payee name was altered without Victim-6's permission or authority, and the check never made it to its intended recipient.

36. The investigation has revealed that Account Holder-2 provided the account debit card and pin number to RUIZ-RAMIREZ at his request, and that RUIZ-RAMIREZ made deposits and withdrawals using Account Holder-2's account.

***CAMINERO, GOMEZ, and DELEON:***

37. The investigation has further revealed that defendants CAMINERO, GOMEZ, and DELEON, and other co-conspirators, fraudulently deposited more than 300 Stolen Financial Instruments into at least five bank accounts. Three of these bank accounts were opened in CAMINERO's name, including a Bank-5 account ending 1321 ("the 1321 Account"), a Bank-6 account ending in 7114 ("the 7114 Account"), and Bank-7 account ending in 2527 ("the 2527 Account") (collectively CAMINERO's Accounts). The fourth account was opened in GOMEZ's name, a Bank-2 account ending in 3271 ("the 3271 Account"), and the fifth account was opened in DELEON'S name, a Bank-2 account ending in 2784 (the "2784 Account").

38. Several of the financial instruments deposited into these five accounts owned by CAMINERO, GOMEZ, AND DELEON, were reported stolen after being deposited into the Broadway Collection Box and other mail collection boxes within the 07104 zip code, from between in or around October 2018 through in or around December 2019. These financial instruments were altered to remove the legitimate payee name and replace it with the names of either CAMINERO, GOMEZ, or DELEON.

39. For example, bank records reveal that on or about July 5, 2019, a money order for \$800.00 (Money Order-3) was altered and fraudulently deposited

into CAMINERO's 7114 Account. Law enforcement reviewed a mail theft complaint filed by Victim-7, the owner of Money Order-3. Victim-7 reported that Victim-7 placed Money Order-3 into the Broadway Collection Box on or about July 2, 2019. After placing it in the Broadway Collection Box, the payee name was altered without Victim-7's permission or authority to reflect the new payee name of "Cory Mojica" (i.e. CAMINERO).

40. Bank records reveal that between in or around October 2018 and December 2019, numerous Stolen Financial Instruments (primarily money orders) were deposited into CAMINERO's Accounts via ATM and/or mobile phone application, totaling more than \$75,000. The majority of these financial instruments were altered to include CAMINERO's name (usually as "Cori Mojica") as the payee.

41. Furthermore, between in or around October 2018 and in or around July 2019, numerous Stolen Financial Instruments (primarily money orders), totaling approximately \$29,957.06, were deposited into GOMEZ's 3271 Account via ATM and/or mobile phone application. The majority of these financial instruments were altered to include GOMEZ's name (usually as "Marisol Gomez") as the payee.

42. For example, bank video surveillance reveals that on or about May 28, 2019, CAMINERO fraudulently deposited an altered money order in the amount of \$761.00 (Money Order-4), into GOMEZ's 3271 Account.

43. The investigation has revealed that after Victim-8, the owner of Money Order-4, deposited Money Order-4 into a mail collection box within the confines of the zip code 07104, in Newark, on or about May 7, 2019, the payee name was altered without her permission or authority to reveal the new payee name of "Marisol Gomez," and the money order never made it to its intended recipient.

44. Finally, between in or around February 2019 and in or around June 2019, numerous Stolen Financial Instruments (primarily money orders), totaling approximately \$35,807.03, were deposited into DELEON's 2784 Account via ATM and/or mobile phone application. The majority of these financial instruments were altered to include DELEON's name (usually "Daury Deleon") as the payee.

45. For example, bank video surveillance video reveals that on or about June 7, 2019, DELEON fraudulently deposited an altered money order in the amount of \$750.00 (Money Order-5), into the 2784 Account.

46. The investigation has revealed that after Victim-9, the owner of Money Order-5, deposited Money Order-5 into the Broadway Collection Box sometime in the beginning of June 2019, the payee name was altered without

his permission or authority, and the money order never made it to its intended recipient.

47. Bank surveillance videos show CAMINERO, GOMEZ, DELEON, and other co-conspirators conducting deposits and/or withdrawals at various ATM locations relating to the five accounts mentioned above.

48. Specifically, bank surveillance videos show CAMINERO making deposits of Stolen Financial Instruments into an account opened in his name as well as into GOMEZ's 3271 Account and DELEON's 2784 account, on at least 20 occasions. Similarly, surveillance videos show CAMINERO making numerous withdrawals from GOMEZ's 3271 Account and DELEON's 2784 account.

49. On numerous occasions, bank surveillance videos show CAMINERO present together with either GOMEZ or DELEON, while making ATM deposits of the Stolen Financial Instruments into GOMEZ's or DELEON's accounts, as well as withdrawals from these accounts.

50. Bank surveillance videos show GOMEZ making numerous deposits of the Stolen Financial Instruments into her 3271 Account, and withdrawals therefrom.

51. Bank surveillance videos show DELEON making deposits and/or withdrawals of the Stolen Financial Instruments into both the accounts opened in his name, as well as GOMEZ's 3271 Account.

#### **E. Defendants' Statements to Law Enforcement**

52. On or about September 20, 2019, during an interview with law enforcement, CAMINERO admitted in sum and substance that sometime in late 2018 or early 2019, he was recruited by an individual who provided him with money to open up several bank accounts, and to fraudulently deposit numerous money orders into these accounts via ATM and mobile phone applications. He was provided the money orders from the individual and was paid a percentage of the amount of each deposit.

53. On or about October 2, 2019, during an interview with law enforcement, GOMEZ admitted in sum and substance that she was introduced to an individual who gave her money to provide access to her Bank-2 account (i.e. the 3271 Account), which was used to deposit money orders.

54. On or about October 28, 2019, during an interview with law enforcement, DELEON admitted in sum and substance that he was introduced to an individual who gave him money in exchange for opening and providing

access to a Bank-2 account in DELEON's name (i.e. the 2784 Account), and for depositing checks and money orders into other people's accounts.

**F. Phone Records**

55. Phone records reveal that RUIZ-RAMIREZ and CAMINERO telephonically communicated approximately 84 times between in or around September 10, 2019 and in or around October 1, 2019.