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**AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR CRIMINAL COMPLAINTS AND ARREST WARRANTS,  
SEARCH WARRANTS AND SEIZURE WARRANTS FOR BANK ACCOUNTS**

**I. INTRODUCTION**

1. I make this affidavit in support of an application for criminal complaints charging Norman CIPRIANO (YOB: 1972) and Patrick VIGNEAU (YOB: 1964) with Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 2314, Conspiracy to Commit Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 371, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h), and Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957.
2. I also make this affidavit in support of an application for search warrants authorizing the search of (25) UPS Ground packages bearing the following tracking numbers and further described in Attachment A (hereinafter "SUBJECT PARCELS"):

1		8405
2		7235
3		0068
4		7113
5		6032
6		2894
7		8521
8		0901
9		4224
10		7540
11		9962
12		7515
13		8156
14		6612
15		0677
16		9301
17		9339
18		0091
19		3283
20		8681
21		3353

22		6517
23		2941
24		3926
25		9335

3. A full description of the SUBJECT PARCELS to be searched pursuant to issuance of the search warrant is attached hereto as Attachment A. A list of items to be seized is attached hereto as Attachment B.
4. I also make this affidavit in support of application for seizure warrants for the funds in the following bank accounts (“SUBJECT FUNDS”):
  - a. all funds in TD Bank account [REDACTED] 1767, held in the name Jenerest Surplus, LLC; and
  - b. all funds in Walmart e-commerce account held in the name of Jenerest Surplus, LLC.

I request that a seizure warrant, authorizing the seizure of the SUBJECT FUNDS in these accounts pursuant to 18 U.S.C. §§ 981 and 982(b)(1) and 21 U.S.C. § 853(f) be issued by this Court.

5. As set forth below, there is probable cause to believe that the funds in each of the aforementioned bank accounts were involved in Money Laundering in violation of 18 U.S.C. § 1956(a)(1) and/or derived from proceeds traceable to violations of specified unlawful activities (as defined in 18 U.S.C. §§ 1956(c)(7), 1961(1)), specifically Interstate Transportation of Stolen Goods (18 U.S.C. § 2314). As such, those funds in the bank accounts are subject to seizure and forfeiture under 18 U.S.C. §§ 981(a)(1)(A)/(C), 982(a)(1) and 28 U.S.C. § 2461.
6. From my consultations with the United States Attorney’s Office for the District of Rhode Island, I am aware that federal court decisions have defined property that is “involved in” a money laundering offense, and hence forfeitable under 18 U.S.C. § 982(a)(1), to include three categories of proceeds: (1) the proceeds of specified unlawful activity (“SUA”) that were the subject of a money laundering transaction; (2) funds that were commingled with SUA proceeds at the time of the money laundering transaction; and (3) in money laundering concealment crimes, 18 U.S.C. § 1956(a)(1)(B)(ii), funds that were commingled with SUA proceeds, irrespective of

whether the commingled funds were part of a money laundering transaction. I am advised that among these decisions are United States v. Huber, 404 F.3d 1047 (8<sup>th</sup> Cir. 2005); United States v. Real Property Known as 1700 Duncanville Road, 90 F. Supp.2d 737, 741 (N.D. Tex 2000), aff'd, 250 F.3d 738 (5<sup>th</sup> Cir. 2001) (Table); United States v. One 1987 Mercedes Benz 300E, 820 F. Supp. 248, 252 (E.D. Va. 1993); and United States v. All Monies, 754 F. Supp. 1467, 1475-76 (D. Hawaii 1991).

7. By reason of the foregoing, there is probable cause to believe that each of the SUBJECT FUNDS described above, constitutes property involved in a money laundering offenses, 18 U.S.C. §§ 1956(a)(1)(A) and (B), and 1956(h), or property traceable to such property, and therefore are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 982(a)(1) (criminal forfeiture of property involved in money laundering).
8. Pursuant to 18 U.S.C. § 981(b), “notwithstanding the provisions of rule 41(a) of the Federal rules of Criminal Procedure, a seizure warrant may be issued pursuant to this subsection by a judicial officer in any district in which a forfeiture against the property may be filed.” Further, pursuant to 21 U.S.C. § 853(f), the Government may request a seizure warrant for property subject to forfeiture and “[i]f the court determines that there is probable cause to believe that the property to be seized would, in the event of conviction, be subject to forfeiture and that a [restraining order or injunction] order under subsection (e) may not be sufficient to assure the availability of the property for forfeiture, the court shall issue a warrant authorizing the seizure of such property.” Finally, 28 U.S.C. § 853(l) provides, “The district courts of the United States shall have jurisdiction to enter orders as provided in this section without regard to the location of any property which may be subject to forfeiture under this section, or which has been ordered forfeited under this section.”
9. For the reasons set forth below, I respectfully submit that there is probable cause to believe that (1) in the event of the conviction of CIPRIANO, each of the Accounts containing the SUBJECT FUNDS will be subject to forfeiture, and (2) a restraining order under 21 U.S.C. § 853(e) may not be sufficient to assure the availability of the SUBJECT FUNDS for forfeiture. I know from my training and experience, as well as CIPRIANO’s attempt to withdraw funds from BOA accounts as agents were conducting a search of his residence on September 11, 2024, and as further detailed below, and

from the training and experience of other law enforcement agents, that once the unlawful activities of a perpetrator are discovered by law enforcement authorities, the perpetrators of interstate transportation of stolen property and money laundering crimes, and conspiracy to commit the same, often quickly encumber, transfer, or otherwise conceal their assets to avoid the seizure and forfeiture thereof, notwithstanding court orders to the contrary. I also know from my training and conversations with other law enforcement officers that, even where banks are ordered restrained from releasing criminal proceeds in a specified account, banks cannot always guarantee error-proof compliance with such orders. I am also aware from my training and conversations with other law enforcement officers, that restraining orders do not always prevent banks from exercising purported rights of set-off against the restrained accounts, contrary to both the restraining order and forfeiture laws governing third-party claimants. Therefore, pursuant to 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(f), warrants authorizing the seizure of the SUBJECT FUNDS should be issued.

10. The facts set forth in the Affidavit are based on my personal observations, my training and experience, information obtained from other agents, witnesses, and records obtained during the course of the investigation. Because I submit this Affidavit for the limited purpose of showing probable cause, I have not included in this Affidavit each and every fact that I have learned in this investigation. Rather, I have set forth only facts sufficient to establish probable cause to issue an arrest warrant for the individuals identified herein and to seize the bank accounts set forth herein. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

## **II. AFFIANT BACKGROUND**

11. I have been a law enforcement officer for over 20 years and have been a United States Postal Inspector since July 2017. I am currently assigned to the Providence, Rhode Island domicile of the United States Postal Inspection Service and I am responsible for the investigation of various crimes relating to the United States Mail including, but not limited to mail fraud, bank fraud, identity theft, mail theft, interstate transportation of stolen property, and money laundering. Prior to my appointment as a Postal Inspector, I was a Special Agent with the United States Secret Service for approximately 13 years. I

have received training in conducting investigations of crimes that adversely affect, or fraudulently use, the United States Mail and the United States Postal Service (USPS). I have participated in criminal investigations of various violations of Title 18 of the United States Code involving financial crimes, including mail, bank, and wire fraud, identity theft, interstate transportation of stolen property, money laundering, and computer crimes. In the course of my employment, I have received training and have been involved in the use of investigative techniques such as interviewing victims, informants, and witnesses, conducting physical surveillance, and analyzing financial records. I have participated in and executed dozens of search, arrest, and seizure warrants.

### **III. PROBABLE CAUSE**

12. As set forth in this Affidavit and the Affidavit in Support of Application For Search Warrants and Seizure Warrants for Bank Accounts, attached and incorporated by reference as Exhibit 1, the U.S. Attorney's Office for the District of Rhode Island, the U.S. Postal Inspection Service (USPIS) and Homeland Security Investigations (HSI) are conducting a criminal investigation involving Norman CIPRIANO (YOB: 1972), Patrick VIGNEAU and others, concerning violations of federal offenses, including Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 2314, Conspiracy to Commit Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 371, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h), and Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957.
13. On September 9, 2024, this Court issued search warrants to include search warrants for CIPRIANO's residence at [REDACTED], Warwick, RI, VIGNEAU's residence at [REDACTED], Cranston, RI, a storage location that was leased in CIPRIANO and [REDACTED] name at 172 Exchange St, Room 001, Pawtucket, RI, and another storage location at [REDACTED], Pawtucket, RI.
14. On September 11, 2024, at approximately 6:00 a.m., the search warrant for [REDACTED], Warwick, RI was executed with CIPRIANO present at the residence when law enforcement arrived to execute the search warrant. During the search, CIPRIANO made

comments such as, “If I were younger, I would whip your a\*\* [expletive].” In the basement of the residence, numerous products suspected to be stolen were seized including allergy medicine and makeup that were still in its original packaging and with some products with CVS, Walgreen, and Giant stickers still on the product. Prior to being read his Miranda rights and prior to being informed about the nature of the investigation, CIPRIANO spontaneously uttered that this wasn’t a violent crime. CIPRIANO was then read his Miranda rights and agreed to speak with law enforcement. CIPRIANO admitted that it was all his, and that this was all his business. A sample of the numerous products seized at [REDACTED] and boxed<sup>1</sup> as evidence is shown at below:



15. During the search of [REDACTED], I observed Walmart return packages, that is packages returned by buyers from the Walmart e-commerce marketplace. The packages were returned to “Jenerest Surplus, LLC” at the [REDACTED] address. A Walmart Loss Prevention Agent on scene at the time of the search warrant of [REDACTED] advised that Jenerest Surplus, LLC had a Walmart e-commerce account. The Walmart e-commerce account for Jenerest Surplus, LLC was linked to TD Bank account [REDACTED] 1767, held in the name Jenerest Surplus, LLC. TD Bank records for this account shows that the manager/approver for this account is CIPRIANO with an address out of New Mexico. In addition, the Walmart Loss Prevention Agent advised that on September 10, 2024, approximately \$35,000 was transferred from the Walmart e-commerce account for

<sup>1</sup> The products that were seized on September 11, 2024, from the search warrant locations were placed by agents in the boxes shown in this affidavit.



Jenerest Surplus, LLC, to the payout account, TD Bank account [REDACTED] 1767.

Subsequently, a letter requesting TD Bank freeze the funds in TD Bank account [REDACTED] 1767 was served on TD Bank in anticipation of obtaining a seizure warrant for these funds.

16. On September 11, 2024, at approximately 6:00 am, a search warrant was executed at [REDACTED] Cranston, RI. VIGNEAU was present in the basement of the residence when law enforcement arrived to execute the search warrant. In the basement of the residence, were documents, police reports, and cards including an identification card in VIGNEAU's name. In the basement of the residence, numerous products suspected to be stolen were seized including health and beauty products that were still in its original packaging, including CVS brand products. A sample of the numerous products seized and boxed as evidence, as well as packaging material seized at [REDACTED] as shown below:



17. At some point during the search of [REDACTED], CIPRIANO left the premises. Later, as an HSI Special Agent went to a Bank of America (BOA) in Warwick, RI, to serve seizure warrants for three BOA accounts associated with CIPRIANO. The HSI Agent observed CIPRIANO waiting in line inside the BOA. The HSI Agent then observed CIPRIANO take out his phone and say, "This is Norm Cipriano." The HSI agent then went directly to a BOA representative and asked to speak to a manager. The HSI agent then advised the bank manager that he had seizure warrants for three BOA accounts and that the individual associated with those accounts was inside the bank right now. After speaking to the manager, the HSI agent observed CIPRIANO sitting in a chair still inside the BOA speaking on his cellphone said something to effect of, they seized all my accounts, and I don't know who else to turn to that's why I'm calling you. Notably, CIPRIANO was speaking on an unknown cellphone as his cellphones were seized from the search of his residence at [REDACTED].

18. On September 11, 2024, the search warrant for 172 Exchange St, Room 001, Pawtucket, RI was executed. At this location, numerous products suspected to be stolen were stored as shown below:



19. On September 11, 2024, a search warrant was executed at [REDACTED], Pawtucket, RI, which is owned by CIPRIANO. At the time the search warrant was executed at 6:00



a.m., there were no individuals inside of [REDACTED]. At this location, numerous products suspected to be stolen were seized and boxed as evidence as shown below:







In addition, while the search warrant was being executed, UPS delivered approximately 10-15 additional boxes to this location which were also seized and found to contain various health and beauty products and automotive accessories.

20. In all, approximately 60,000 products with an approximate value of at least \$1,600,000 were seized according to a valuation done by RGIS<sup>2</sup> and retail representatives, at the search locations. Based upon my training, experience, and information obtained from this investigation, the products seized from the locations described above are believed to be stolen. Based on all the foregoing facts as well as the Affidavit in Support of Application For Search Warrants and Seizure Warrants for Bank Accounts, attached and incorporated by reference as Exhibit 1, I submit that there is probable cause to believe that from January 1, 2021, to September 11, 2024, CIPRIANO and VIGNEAU committed Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 2314, Conspiracy to Commit Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 371, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to

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<sup>2</sup> RGIS is a company that completes third-party inventory counts at various retailers throughout the US.

Commit Money Laundering in violation of 18 U.S.C. § 1956(h), and Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957.

21. On September 12, 2024, the SUBJECT PARCELS, (25) UPS Ground packages bearing various tracking numbers addressed to Norman CIPRIANO, JDC Wholesale and East Coast Deals, with a delivery address of [REDACTED], Pawtucket, RI, were observed by UPS Investigators in the package stream at the UPS Distribution Center, located at 150 Plan Way, Warwick, RI. Most of the SUBJECT PARCELS are consistent in size and weight from packages previously seized during the September 11, 2024, search warrant at [REDACTED], Pawtucket, RI, that contained suspected stolen health and beauty products and automotive accessories. The SUBJECT PARCELS are currently in the HSI RI Office in anticipation of obtaining search warrants for the SUBJECT PARCELS and are shown below:



22. The SUBJECT PARCELS were addressed to Norman Cipriano, Eastcoastdeals LLC, and JDC Wholesale LLC and were from various senders as shown below:

Tracking Number	Shipper	Recipient	Recipient Address
8405		Norman Cipriano	Pawtucket, RI 02860
7235		Norman Cipriano	Pawtucket, RI 02860
0068		Norman Cipriano	Pawtucket, RI 02860
7113		Norman Cipriano	Pawtucket, RI 02860
6032		Eastcoastdeals1 LLC	Pawtucket, RI 02860
2894		Eastcoastdeals1 LLC	Pawtucket, RI 02860
8521		Eastcoastdeals1 LLC	Pawtucket, RI 02860
0901		Norman Cipriano	Pawtucket, RI 02860
4224		Norman Cipriano	Pawtucket, RI 02860
7540		Norman Cipriano	Pawtucket, RI 02860
9962		Norman Cipriano	Pawtucket, RI 02860
7515		Norman Cipriano	Pawtucket, RI 02860
8156		Norman Cipriano	Pawtucket, RI 02860
6612		Norman Cipriano	Pawtucket, RI 02860
0677		Norman Cipriano	Pawtucket, RI 02860
9301		Eastcoastdeals1 LLC	Pawtucket, RI 02860
9339		Eastcoastdeals1 LLC	Pawtucket, RI 02860
0091		Norman Cipriano	Pawtucket, RI 02860
3283		Eastcoastdeals1 LLC	Pawtucket, RI 02860
8681		Norman Cipriano	Pawtucket, RI 02860
3353		Eastcoastdeals1 LLC	Pawtucket, RI 02860
6517		Eastcoastdeals1 LLC	Pawtucket, RI 02860
2941		Eastcoastdeals1 LLC	Pawtucket, RI 02860
3926		Norman Cipriano	Pawtucket, RI 02860
9335		JDC Wholesale LLC	Pawtucket, RI 02860

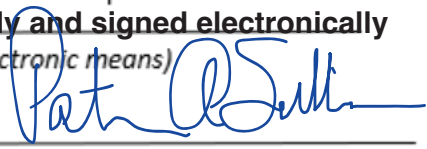
23. Based upon my training, experience, and information obtained from this investigation, the SUBJECT PARCELS are believed to contain stolen product.
24. Additionally, I submit there is probable cause to believe that the SUBJECT FUNDS were involved in Money Laundering in violation of 18 U.S.C. § 1956(a)(1) and/or derived from proceeds traceable to violations of specified unlawful activities (as defined in 18 U.S.C. §§ 1956(c)(7), 1961(1)), specifically Interstate Transportation of Stolen Goods (18 U.S.C. § 2314). Accordingly, the SUBJECT FUNDS are subject to seizure and forfeiture under 18 U.S.C. §§ 981(a)(1)(A)/(C), 982(a)(1), and 28 U.S.C. § 2461.



Respectfully submitted,

[Redacted Signature]

[Redacted Title]  
United States Postal Inspection Service  
United States Postal Inspector

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by <u>Sworn telephonically and signed electronically</u> (specify reliable electronic means)	
<u>September 13, 2024</u> <i>Date</i>	 <i>Judge's signature</i>
<u>Providence, Rhode Island</u> <i>City and State</i>	<u>Patricia A. Sullivan, USMJ</u> <i>Magistrate Judge Patricia A. Sullivan</i>

**ATTACHMENT A**  
*(Description of the SUBJECT PARCELS to be searched)*

(25) UPS Ground packages bearing various tracking numbers, as detailed below, addressed to Norman CIPRIANO, JDC Wholesale and East Coast Deals, with a delivery address of [REDACTED], Pawtucket, RI. The (25) UPS Ground packages are currently in the possession of Homeland Security Investigation.

Tracking Number	Shipper	Recipient	Recipient Address
8405	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
7235	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
0068	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
7113	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
6032	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
2894	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
8521	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
0901	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
4224	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
7540	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
9962	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
7515	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
8156	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
6612	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
0677	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
9301	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
9339	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
0091	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
3283	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
8681	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
3353	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
6517	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
2941	[REDACTED]	Eastcoastdeals1 LLC	[REDACTED], Pawtucket, RI 02860
3926	[REDACTED]	Norman Cipriano	[REDACTED], Pawtucket, RI 02860
9335	[REDACTED]	JDC Wholesale LLC	[REDACTED], Pawtucket, RI 02860

**ATTACHMENT B**

A. ITEMS TO BE SEIZED

The following materials, which constitute evidence of the commission of a criminal offense, contraband, the fruits of crime, or property designed or intended for use or which is or has been used as a means of committing a criminal offense, namely violations of the Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 2314, Conspiracy to Commit Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 371, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h), and Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957 (“Specified Federal Offenses”):

1. Stolen property including but not limited to health products (such as allergy medication/sprays, vitamins, pills, nutrition supplements, sunscreen, OTC medications) and beauty products (such as wrinkle corrector, hair products);
2. Records showing the source of the stolen goods including inventory lists.

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANTS  
and  
SEIZURE WARRANTS FOR BANK ACCOUNTS**

I, [REDACTED], being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION**

1. I make this affidavit under Rule 41 of the Federal Rules of Criminal Procedure in support of applications for search warrants for:
  - a. a search of the premises that are referred to as [REDACTED], Pawtucket, RI 02860 (“SUBJECT PREMISES 1”), as more particularly described in Attachments A-1 (attached hereto and incorporated herein by reference), including any person present at the time the search warrant is executed, for the items described in Attachments B.
  - b. a search of the premises that are referred to as [REDACTED], Warwick, RI 02889 (“SUBJECT PREMISES 2”), as more particularly described in Attachments A-2 (attached hereto and incorporated herein by reference), including any person present at the time the search warrant is executed, for the items described in Attachments B.
  - c. a search of the premises that are referred to as 172 Exchange St, Room 001, Pawtucket, RI 02860 (“SUBJECT PREMISES 3”), as more particularly described in Attachments A-3 (attached hereto and incorporated herein by reference), including any person present at the time the search warrant is executed, for the items described in Attachments B.
  - d. a search of the premises that are referred to as [REDACTED], Cranston, RI 02910 (“SUBJECT PREMISES 4”), as more particularly described in Attachments A-4 (attached hereto and incorporated herein by reference), including any person present at the time the search warrant is executed, for the items described in Attachments B.
  - e. a search of the vehicle that is described as follows: a 2018 Nissan Sentra (VIN# 3N1AB7AP4JY297027), color silver, registered in the name of [REDACTED] (“[REDACTED]”), [REDACTED], Pawtucket, RI, Rhode Island registration ZA496, and believed to be located at [REDACTED], Pawtucket, RI (“SUBJECT VEHICLE



1”), as more particularly described in Attachment A-5 (attached hereto and incorporated herein by reference), including any person present at the time the search warrant is executed, for the items described in Attachment B.

- f. a search of the vehicle that is described as follows: a 2020 Nissan Rogue (VIN# JN8AT2MV6LW134501), color silver, registered in the name of Norman CIPRIANO (“N. CIPRIANO”), [REDACTED], Warwick, RI, Rhode Island registration RF197, and believed to be located at [REDACTED], Warwick, RI (“SUBJECT VEHICLE 2”), as more particularly described in Attachment A-6 (attached hereto and incorporated herein by reference), including any person present at the time the search warrant is executed, for the items described in Attachment B.
  - g. a search of the vehicle that is described as follows: a 2016 Dodge Challenger (VIN# 2C3CDZAG8GH225715), color white, registered in the name of Patrick VIGNEAU (“VIGNEAU”), [REDACTED], Cranston, RI, Rhode Island registration 1EK361, and believed to be located at [REDACTED], Cranston, RI (hereinafter referred to as the “SUBJECT VEHICLE 3”), as more particularly described in Attachment A-7 (attached hereto and incorporated herein by reference), including any person present at the time the search warrant is executed, for the items described in Attachment B.
2. As set forth below, there is probable cause to believe that located within the SUBJECT PREMISES 1-4 and SUBJECT VEHICLES 1-3 are evidence, fruits, and instrumentalities of violations of the Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 2314, Conspiracy to Commit Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 371, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h), and Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957.
3. I also make this affidavit in support of an application for a warrant under Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 3117 and 28 U.S.C. § 1651, in support of an application for a warrant and order authorizing the use of a Global Positioning System (“GPS”) mobile tracking device for a period of forty-five (45) days (the “Requested

Information”) by trained law enforcement technicians on SUBJECT VEHICLE 1.

Based on the facts set forth in this affidavit, I believe that the SUBJECT VEHICLE 1 is presently being used in furtherance of Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 2314, Conspiracy to Commit Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 371, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h), and Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957, and that there is probable cause to believe that the installation of a tracking device on SUBJECT VEHICLE 1 and use of the tracking device will lead to evidence, fruits, and instrumentalities of the aforementioned crimes as well as to the identification of individuals who are engaged in the commission of those and related crimes.

4. I also make this affidavit in support of application for seizure warrants for the funds in the following bank accounts (the “SUBJECT FUNDS”):
  - a. all funds in Amazon e-commerce account held in the name of “JDC Wholesale LCC” (“SUBJECT ACCOUNT 1”), as further described in Attachment A-8.
  - b. all funds in Bank of America account [REDACTED] 3476 held in the name JDC Wholesale, LLC (“SUBJECT ACCOUNT 2”), as further described in Attachment A-9.
  - c. all funds in Bank of America account [REDACTED] 4205, held in the names Norman Leo CIPRIANO, [REDACTED] (“SUBJECT ACCOUNT 3”), as further described in Attachment A-10.
  - d. all funds in Bank of America account [REDACTED] 5605, held in the name East Coast Deals One LLC (“SUBJECT ACCOUNT 4”), as further described in Attachment A-11.
  - e. all funds in TD Bank account [REDACTED] 8672, held in the name [REDACTED] (“SUBJECT ACCOUNT 5”), as further described in Attachment A-12.
  - f. all funds in TD Bank account [REDACTED] 7525, held in the name [REDACTED] [REDACTED] (“SUBJECT ACCOUNT 6”), as further described in Attachment A-13.

- g. all funds in TD Bank account [REDACTED] 7837, held in the name Atlantic Coast Discounts LLC, (“SUBJECT ACCOUNT 7”), as further described in Attachment A-14.
- h. all funds in TD Bank account [REDACTED] 1714, held in the name Patrick VIGNEAU (“SUBJECT ACCOUNT 8”), as further described in Attachment A-15.
- i. all funds in eBay e-commerce account held in the name of “Angie’s Discount Store” (“SUBJECT ACCOUNT 9”), as further described in Attachment A-16.

I request that a seizure warrant, authorizing the seizure of the SUBJECT FUNDS pursuant to 18 U.S.C. §§ 981 and 982(b)(1) and 21 U.S.C. § 853(f) be issued by this Court.

5. As set forth below, there is probable cause to believe that the funds in each of the aforementioned bank accounts were involved in Money Laundering in violation of 18 U.S.C. § 1956(a)(1) and/or derived from proceeds traceable to violations of specified unlawful activities (as defined in 18 U.S.C. §§ 1956(c)(7), 1961(1)), specifically Interstate Transportation of Stolen Goods (18 U.S.C. § 2314). As such, those funds in the bank accounts are subject to seizure and forfeiture under 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1) and 28 U.S.C. § 2461.
6. From my consultations with the United States Attorney’s Office for the District of Rhode Island, I am aware that federal court decisions have defined property that is “involved in” a money laundering offense, and hence forfeitable under 18 U.S.C. § 982(a)(1), to include three categories of proceeds: (1) the proceeds of specified unlawful activity (“SUA”) that were the subject of a money laundering transaction; (2) funds that were commingled with SUA proceeds at the time of the money laundering transaction; and (3) in money laundering concealment crimes, 18 U.S.C. § 1956(a)(1)(B)(ii), funds that were commingled with SUA proceeds, irrespective of whether the commingled funds were part of a money laundering transaction. I am advised that among these decisions are United States v. Huber, 404 F.3d 1047 (8<sup>th</sup> Cir. 2005); United States v. Real Property Known as 1700 Duncanville Road, 90 F. Supp.2d 737, 741 (N.D. Tex 2000), aff’d, 250 F.3d 738 (5<sup>th</sup> Cir. 2001) (Table); United States v. One 1987 Mercedes Benz 300E, 820 F. Supp. 248, 252 (E.D. Va. 1993); and United States v. All Monies, 754 F. Supp. 1467, 1475-76 (D. Hawaii 1991).

7. By reason of the foregoing, there is probable cause to believe that each of the SUBJECT FUNDS described above, constitutes property involved in a money laundering offenses, 18 U.S.C. §§ 1956(a)(1)(A) and (B), and 1956(h), or property traceable to such property, and therefore are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 982(a)(1) (criminal forfeiture of property involved in money laundering).
8. Pursuant to 18 U.S.C. § 981(b), “notwithstanding the provisions of rule 41(a) of the Federal rules of Criminal Procedure, a seizure warrant may be issued pursuant to this subsection by a judicial officer in any district in which a forfeiture against the property may be filed.” Further, pursuant to 21 U.S.C. § 853(f), the Government may request a seizure warrant for property subject to forfeiture and “[i]f the court determines that there is probable cause to believe that the property to be seized would, in the event of conviction, be subject to forfeiture and that a [restraining order or injunction] order under subsection (e) may not be sufficient to assure the availability of the property for forfeiture, the court shall issue a warrant authorizing the seizure of such property.” Finally, 28 U.S.C. § 853(l) provides, “The district courts of the United States shall have jurisdiction to enter orders as provided in this section without regard to the location of any property which may be subject to forfeiture under this section, or which has been ordered forfeited under this section.”
9. For the reasons set forth below, I respectfully submit that there is probable cause to believe that (1) in the event of the conviction of N. CIPRIANO, [REDACTED], [REDACTED], VIGNEAU, and/or others, each of the Accounts containing the SUBJECT FUNDS will be subject to forfeiture, and (2) a restraining order under 21 U.S.C. § 853(e) may not be sufficient to assure the availability of the SUBJECT FUNDS for forfeiture. I know from my training and experience and from the training and experience of other law enforcement agents, that once the unlawful activities of a perpetrator are discovered by law enforcement authorities, the perpetrators of interstate transportation of stolen property and money laundering crimes, and conspiracy to commit the same, often quickly encumber, transfer, or otherwise conceal their assets to avoid the seizure and forfeiture thereof, notwithstanding court orders to the contrary. I also know from my training and conversations with other law enforcement officers that, even where banks are ordered



restrained from releasing criminal proceeds in a specified account, banks cannot always guarantee error-proof compliance with such orders. I am also aware from my training and conversations with other law enforcement officers, that restraining orders do not always prevent banks from exercising purported rights of set-off against the restrained accounts, contrary to both the restraining order and forfeiture laws governing third-party claimants. Therefore, pursuant to 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(f), warrants authorizing the seizure of the SUBJECT FUNDS should be issued.

10. The facts set forth in the Affidavit are based on my personal observations, my training and experience, information obtained from other agents, witnesses, and records obtained during the course of the investigation. Because I submit this Affidavit for the limited purpose of showing probable cause, I have not included in this Affidavit each and every fact that I have learned in this investigation. Rather, I have set forth only facts sufficient to establish probable cause to issue a search warrant for the premises and vehicles identified herein and a seizure warrants for the bank accounts set forth herein. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

## **II. AFFIANT BACKGROUND**

11. I have been a law enforcement officer for over 20 years and have been a United States Postal Inspector since July 2017. I am currently assigned to the Providence, Rhode Island domicile of the United States Postal Inspection Service and I am responsible for the investigation of various crimes relating to the United States Mail including, but not limited to mail fraud, bank fraud, identity theft, mail theft, interstate transportation of stolen property, and money laundering. Prior to my appointment as a Postal Inspector, I was a Special Agent with the United States Secret Service for approximately 13 years. I have received training in conducting investigations of crimes that adversely affect, or fraudulently use, the United States Mail and the United States Postal Service (USPS). I have participated in criminal investigations of various violations of Title 18 of the United States Code involving financial crimes, including mail, bank, and wire fraud, identity theft, interstate transportation of stolen property, money laundering, and computer crimes. In the course of my employment, I have received training and have been involved in the use of investigative techniques such as interviewing victims,

informants, and witnesses, conducting physical surveillance, and analyzing financial records. I have participated in and executed dozens of search, arrest, and seizure warrants.

### **III. PROBABLE CAUSE**

12. As set forth in this Affidavit, the U.S. Attorney's Office for the District of Rhode Island, the U.S. Postal Inspection Service (USPIS) and Homeland Security Investigations (HSI) are conducting a criminal investigation involving Norman CIPRIANO, [REDACTED], [REDACTED], Patrick VIGNEAU, and others, concerning violations of federal offenses, including Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 2314, Conspiracy to Commit Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 371, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h), and Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957.
13. The investigation involves an organized retail crime (ORC) ring in which the perpetrators purchased and received stolen goods interstate from individuals they knew were engaged in the theft of merchandise from various retailers and then resold the stolen goods through online marketplaces.

#### **Background on ORC**

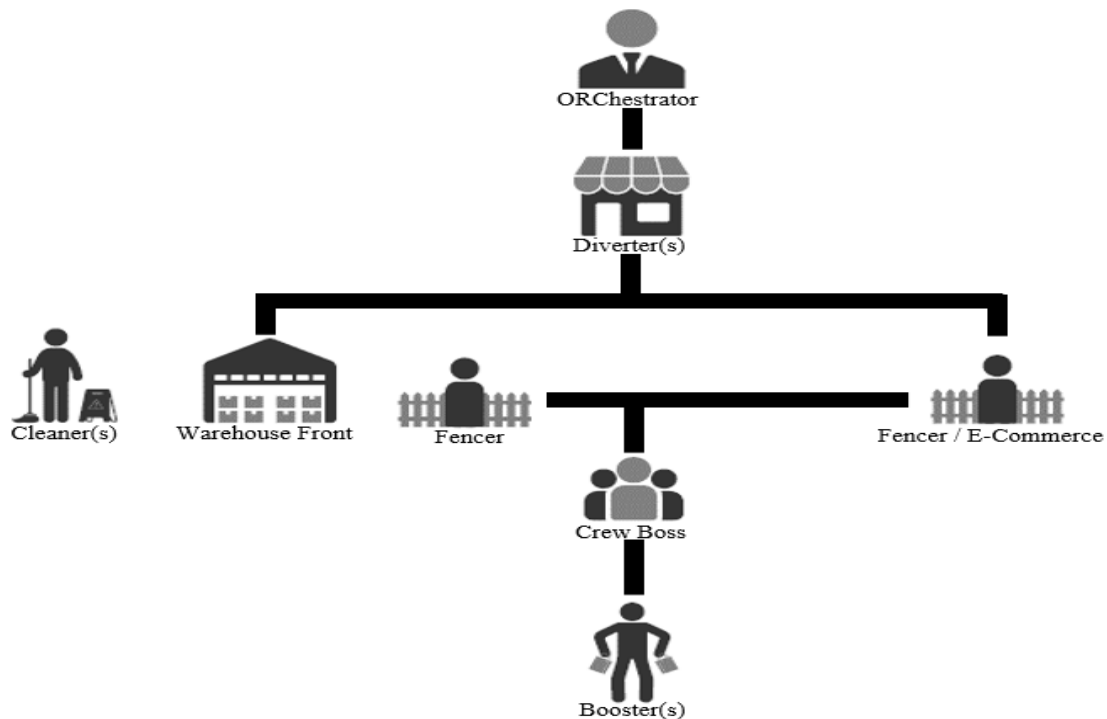
14. ORC is one of the leading causes of inventory loss causing significant impact across the country, with communities nationwide experiencing widespread economic repercussions. According to a U.S. Chamber of Commerce report published in March 2023, retail theft represented \$125.7 billion in economic losses nationwide, not including \$14.9 billion in lost federal, state, and local tax revenue. Additionally, ORC is also a major cause of violence in retail environments, creating safety risks for retail workers and customers<sup>1</sup>.
15. Based upon my training, experience, and research on ORCs, these criminal organizations need to find ways to launder the illicit proceeds gained from ORC activities. These well-organized organizations often launder their proceeds by laying

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<sup>1</sup> US Chamber of Commerce – Retail Crime Data Center  
(<https://www.uschamber.com/economy/retail-crime-data-center>)

illicit funds through shell companies used to make the stolen goods appear legitimate. In addition, the ORCs utilize unregulated payment processors such as PayPal in order to avoid detection. Further, the ORCs utilize various online marketplaces such as eBay, Amazon, and Walmart marketplace to sell the stolen goods quickly by pricing the stolen goods substantially lower than their market price while laundering the funds through their third-party payment processors.

16. ORC operations can vary in size, complexity, roles, and hierarchy. Among the roles, are the following, with boosters being on the bottom of the hierarchy and ORChestrators on the top of the hierarchy as shown and further detailed below:



- a. **Booster** - Boosters are the thieves on the ground that steal (boost) the products. They typically have a list of merchandise to steal provided by their crew boss. The boosters will likely be paid in cash or through anonymous/encrypted peer-to-peer payment apps. Boosters often work in groups, with individuals tasked as lookouts (keeping an eye out for salespeople), or distractors (distracting salespeople while the boosters steal merchandise). Boosters often use modified clothing or modified shopping bags lined with aluminum foil, to defeat security tag technology. They may also simply fill up a shopping cart and push it out the door without making payment.
- b. **Crew Boss** - The crew boss leads a group of boosters on the ground. Crew bosses communicate with the fencers regarding logistics and pricing. The fencer provides the crew boss with a list of items to steal, which they then communicate to

the boosters.

- c. **Cleaner** - Cleaners typically work for a fencer or a diverter, and they are responsible for “cleaning” the product by ensuring the stolen goods have no indications of theft by removing retail anti-theft stickers. This often occurs at repackaging facilities, which are illicit operations often in small warehouses or businesses.
- d. **Fencer** - Fencers are typically the middleman between the boosters/crew bosses and other individuals involved in the organization such as the diverter or ORChestrator. Fencers will typically own a wholesale front company or a warehouse that employs cleaners and may sell the merchandise either through a store front, at a flea market, or through an online marketplace. In more complex organizations, they may provide the first round of “cleaning”, package merchandise, and ship it in bulk to diverters.
- e. **Diverter** - Diverters are the higher-level illicit wholesalers, salespeople, or coordinators of secondary sales. Diverters often set up shell companies with opaque names designed to place and layer the illicit proceeds of the stolen goods. Diverters typically own warehouses to which the boosters or fencers ship the stolen merchandise. In many cases, these businesses act as suppliers for small to mid-size retail chains, selling merchandise to these companies that in turn is used to stock their shelves for sale to consumers.
- f. **ORChestrators**- ORChestrators often supervise multiple ORC groups or even own brick & mortar stores that sell stolen merchandise. They can also be part of larger syndicates involved in other criminal activity and use the proceeds from ORC to fund other illegal activities including drug and weapon trafficking.

In less complex organizations, the fencer may be the top individual in the ORC network, while more complex networks involve a head of the ORC group, known as the ORChestrator. The fencers, diverters and ORChestrators may all appear to be running legitimate businesses while laundering money through front-companies<sup>2</sup>.

- 17. Historically, many of these goods are fenced in flea markets, pawnshops, and small retail stores; however, stolen merchandise is increasingly being resold in online marketplaces such as Walmart, eBay, and Amazon.
- 18. Criminal organizations generate nearly \$70 billion US dollars of illicit proceeds from ORC activities annually. These organizations launder their illicit proceeds through the formal financial sector, unregulated payment processors, and online marketplaces.

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<sup>2</sup> ACAMS Organized Theft Groups and Organized Retail Crime guide (<https://www.acams.org/en/organized-retail-crime#key-themes-1a5e8f10>)



19. The most common mechanism of illicit sales is using e-commerce online marketplaces. Many online marketplaces do not require customer or merchant identification or vetting, making them easy to exploit by criminals. The fencers will take stock pictures of the cleaned goods and then post those pictures on marketplaces like Amazon, eBay, or Walmart. Third party payment processors are used for transaction laundering which allows illegal businesses to bypass security measures and carry out financial activities that would otherwise be prohibited. By exploiting legitimate payment channels, transaction launderers can evade detection and continue to engage in criminal activities.

### **Individuals/Entities Involved in this ORC Investigation**

#### **Norman CIPRIANO**

20. N. CIPRIANO is believed to be a diverter in this ORC group.
21. In 2005, N. CIPRIANO was convicted on RI state charges of conspiracy and receiving stolen goods and sentenced to ten years, of which, he was ordered to serve six years of that sentence with four years suspended. This case involved N. CIPRIANO receiving stolen goods obtained by boosters and then selling the stolen goods on the internet.
22. In 2014, N. CIPRIANO was convicted on federal charges of trafficking counterfeit goods and sentenced to fifty months in prison, followed by three years of supervised release. This case involved the search of [REDACTED], Warwick, RI (SUBJECT PREMISES 2) that resulted in not only the seizure of nearly 5,000 counterfeit sports jerseys, but also hundreds of bottles of perfume among thousands of other health and beauty products, including make-ups, razor blades, teeth whiteners, toothbrushes, hair products, nutritional supplements, moisturizers, face creams, acne creams, condoms, and pregnancy tests, along with numerous types of name brand over the counter (OTC) medications like Lotrimin, Abreva, Claritin, Zyrtec, Prevacid, Mucinex, Zantac and Prilosec. In all, agents seized approximately 14,700 items.<sup>3</sup> Agents also seized: bulk cash in the amount of \$52,486 in United States Currency; \$2000 in money orders; and a

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<sup>3</sup> Notably, during his post-arrest interview, N. CIPRIANO informed investigators the various health and beauty products recovered during the search warrant were legitimate and that he purchased them from a vendor on the west coast. When questioned further, N. CIPRIANO stated he didn't know who the vendor was and refused to answer any more questions related to the beauty products. When asked why he continued to purchase and import counterfeit jerseys from China that he knew were not legitimate, N. CIPRIANO stated, "I haven't been legit my whole life."

bank check in the amount of \$1440 (Total \$55,926). The value of the infringed goods alone was between \$1 million and \$2.5 million. However, many of the approximately 14,700 items seized were not counterfeit but were believed to be stolen by the investigating agents. That belief was based on the fact that many still had electronic security devices attached to them from retail outlets.<sup>4</sup>

23. On July 19, 2019, N. CIPRANO filed a motion to terminate his supervised release, to the which the United States objected. On August 1, 2019, the Court denied his motion.
24. Massachusetts wage records from the Department of Revenue for N. CIPRIANO show that from 2019-2021, N. CIPRIANO declared employment with WL French Excavating Corporation and claimed the following wages: \$82,436 in 2019, \$74,317 in 2020 and \$85,711 in 2021.
25. Rhode Island wage records from the Division of Taxation for N. CIPRIANO shows that from 2019-2021, N. CIPRIANO declared employment with WL French Excavating Corporation and East Coast Deals LLC and claimed the following wages: \$82,436 in 2019, \$79,757 in 2020 and \$115,824 in 2021. In 2022, N. CIPRIANO declared employment solely with East Coast Deals One LLC and rental real estate and claimed \$156,777 in wages.

26. [REDACTED] is believed to be a diverter in this ORC group.
27. Rhode Island wage records from the Division of Taxation for 2019 shows that [REDACTED] declared employment with ABM Aviation and claimed \$17,974 in wages. From 2020-2022, [REDACTED] declared employment with JDC Wholesale and claimed the following wages: \$18,511 in 2020 and \$44,837 in 2022. No return was filed by [REDACTED] in 2021.<sup>5</sup>

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<sup>4</sup> Those electronic security devices are of the type that are removed at the point-of-sale or cause an alarm to sound at the exit.

<sup>5</sup> There were no wage records on file for [REDACTED] from the Massachusetts Department of Revenue and Connecticut Department of Labor.

28. [REDACTED] is the girlfriend of N. CIPRIANO and believed to be a booster in this ORC group. Rhode Island Adult Correctional Institution (“ACI”) records show that [REDACTED] listed N. CIPRIANO as her boyfriend in her ACI visitor log.
29. On December 16, 2021, [REDACTED] was convicted of RI state charges for shoplifting and received a one-year suspended sentence. This case involved Home Depot Loss Prevention Agents on December 15, 2021, observing an unknown male place a Ryobi mower in his shopping cart and then exit the Home Depot store leaving the shopping cart behind. A short time later, a female, later identified as [REDACTED], took possession of that same shopping cart, and proceeded towards the store exit. Upon exiting the store, [REDACTED] was approached by a Providence PD Detective and Loss Prevention Agent, who identified themselves. After attempting to flee, Providence PD detained [REDACTED] and recovered various stolen Home Depot products, totaling \$604.56. [REDACTED] was arrested, processed, and released on a criminal summons.
30. On August 21, 2023, [REDACTED] was convicted of RI state charges for shoplifting and received a three-year suspended sentence. This case involved [REDACTED] entering the Home Depot store with an empty carriage, filling it with various products and attempting to exit the store without paying on February 8, 2023. Upon being approached by Home Depot Loss Prevention Agents, [REDACTED] fled with the carriage full of merchandise. Providence PD were able to detain and arrest [REDACTED] and recover various Home Depot products, totaling \$399.46.
31. On February 14, 2023, [REDACTED] was charged with shoplifting, and the case is still pending in Bristol County Superior Court. In this case, officers from the North Providence PD were dispatched to the CVS for a report of a shoplifting on January 28, 2023, which had recently occurred. A CVS employee stated she observed a woman, later identified as [REDACTED], fill a shopping cart with a large number of items and proceed to exit the store without paying. North Providence PD were able to locate and arrest [REDACTED] and recover various CVS products, totaling \$783.51.
32. On August 21, 2023, [REDACTED] was convicted of RI state charges for shoplifting and received a three-year suspended sentence. This case involved [REDACTED] entering the Walmart store with an empty carriage, filling it with various products and attempting to exit the store without paying on July 4, 2023. Upon being approached by

Walmart Loss Prevention Agents, [REDACTED] fled on foot leaving the carriage full of merchandise behind. Providence PD were able to locate and arrest [REDACTED].

33. Rhode Island wage records from the Division of Taxation for [REDACTED] show that in 2019, [REDACTED] declared employment as a nanny and at a staffing company and claimed \$11,490 in wages. In 2021, [REDACTED] claimed \$11,473<sup>6</sup> in wages from eBay sales. In 2022, [REDACTED] claimed \$4,316 in wages but provided no tax documents. No return was filed by [REDACTED] in 2020<sup>7</sup>.

#### **Patrick VIGNEAU**

34. VIGNEAU is believed to be a diverter in this ORC group.
35. VIGNEAU is currently on federal supervision in this district, after having been granted compassionate release in 2020 by this Court. Prior to being released, VIGNEAU had served 23 years for engaging in a continuing criminal enterprise, possession with the intent to distribute marijuana and conspiring to commit money laundering and sentenced to 30 years in federal prison.

#### **JDC Wholesale LLC**

36. Rhode Island Secretary of State records show Articles of Organization were filed for JDC Wholesale, LLC on June 8, 2022. The manager of JDC Wholesale, LLC is listed as [REDACTED] with an address of SUBJECT PREMISES 1.
37. As described below, JDC Wholesale, LLC is believed to be a shell company used to sell the suspected stolen goods, make the stolen goods appear legitimate, and place and layer the illicit proceeds of the stolen goods in accounts under this name.

#### **East Coast Deals One LLC**

38. Rhode Island Secretary of State records show East Coast Deals One LLC was incorporated under the laws of the State of Rhode Island on July 30, 2021, by N. CIPRIANO, who is listed as the Manager with a listed address of SUBJECT PREMISES 2. The purpose listed for East Coast Deals One LLC on the RI Secretary of State corporate database was "WHOLESALE TRADE." On October 11, 2022, Rhode

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<sup>6</sup> In 2021, [REDACTED] claimed receipts/sales totaling \$771,933 and expenses totaling \$760,460, thus giving her a purported profit of only \$11,473.

<sup>7</sup> There were no wage records on file for [REDACTED] from the Massachusetts Department of Revenue and Connecticut Department of Labor.



Island Secretary of State revoked the certificate of organization due to failure to file an annual report. On February 22, 2024, East Coast Deals One LLC filed an annual report and was issued a reinstatement of revoked corporate charter.

39. As described below, East Coast Deals One LLC, is believed to be a shell company designed to place and layer the illicit proceeds of the suspected stolen goods in accounts under this name.

#### **Atlantic Coast Discounts LLC**

40. Rhode Island Secretary of State records show that Atlantic Coast Discounts LLC was incorporated under the laws of the State of Rhode Island on September 28, 2023, by N. CIPRIANO, who is listed as the Resident Agent with a listed address of SUBJECT PREMISES 2.
41. As described below, Atlantic Coast Discounts LLC, is believed to be a shell company designed to place and layer the illicit proceeds of the suspected stolen goods in accounts under this name.

#### **Angie's Discount Store**

42. Angie's Discount Store is an eBay store<sup>8</sup> with seller name angecand\_87. Angie's Discount Store eBay store is registered to [REDACTED] with a shipping address of SUBJECT PREMISES 2 and phone number of [REDACTED]-6489<sup>9</sup>. The payout account, SUBJECT ACCOUNT 9, was linked with Chase Bank (x3556) but changed to SUBJECT ACCOUNT 6 in September of 2021. The seller account was registered on August 30, 2020, and is still currently active.
43. As described below, Angie's Discount Store on eBay was used to sell the suspected stolen goods.

### **SUBJECT PREMISES AND VEHICLES**

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<sup>8</sup> An eBay store is a comprehensive e-commerce solution that helps sellers get more out of the eBay marketplace and millions of eBay buyers but getting exclusive marketing and merchandising tools to build a strong brand and keep customers coming back.

<sup>9</sup> A review of records received from T-Mobile pursuant to a Grand Jury subpoena revealed phone number [REDACTED]-6489 is an active account registered to N. CIPRIANO at SUBJECT PREMISES 2.

**SUBJECT PREMISES 1 (██████████, Pawtucket, RI), SUBJECT VEHICLE 1 (Nissan Sentra), SUBJECT VEHICLE 2 (Nissan Rogue), and SUBJECT VEHICLE 3 (Dodge Challenger)**

44. SUBJECT PREMISES 1 is owned by N. CIPRIANO who is believed to have purchased the property in cash on December 20, 2021, for \$205,000<sup>10</sup>. As stated above, SUBJECT PREMISES 1 is the listed address for ██████████, as manager for JDC Wholesale on the RI Secretary of State website.
45. SUBJECT VEHICLE 1 is registered to ██████████ at SUBJECT PREMISES 1.
46. UPS records show that 8,431 packages from various senders were sent to SUBJECT PREMISES 1 between January 5, 2022, and January 4, 2024. Of the 8,431 packages sent, 1,030 of these packages were sent using N. CIPRIANO's UPS Shipping account 6X9426, with N. CIPRIANO as the sender and either N. CIPRIANO, ██████████ or JDC Wholesale as the receiver. Based upon my experience, organized crimes rings, specifically fencing operations, do this for two main reasons: (1) it maintains the anonymity of the boosters shipping the stolen products and (2) guarantees the package, even if returned to the sender, will end up at its intended destination.
47. On February 6, 2024, a retroactive mail cover<sup>11</sup> was initiated related to USPS mailings going to the SUBJECT PREMISES 1. That mail cover captured mail images between January 8, 2024, and February 6, 2024. During this time period, the mail cover included the following mail images:
- a. On January 12, 2024, a Bank of America statement addressed to ██████████ at the SUBJECT PREMISES 1.
  - b. On January 17, 2024, a State of Rhode Island / Business Services Division correspondence addressed to JDC Wholesale LLC c/o ██████████ at the SUBJECT PREMISES 1.
  - c. On January 19, 2024, a UPS correspondence addressed to N. CIPRIANO at the SUBJECT PREMISES 1.

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<sup>10</sup> A review of records received from Bank of America pursuant to a Grand Jury subpoena revealed a withdrawal \$197,228.93 from SUBJECT ACCOUNT 4 on 12/20/2021.

<sup>11</sup> A mail cover is an investigative tool utilized by the USPS to gather information related to letters and parcels going to a specific address.

48. On August 23, 2024, a retroactive mail cover was initiated related to USPS mailings going to the SUBJECT PREMISES 1. That mail cover captured mail images between July 25, 2024, and August 23, 2024, including a mailing from UPS addressed to JDC Wholesale LLC, a mailing from Amica addressed to [REDACTED], a mailing from the Narragansett Bay Commission to N. CIPRIANO, and a package from Factory Packaging to P. VIGNEAU.
49. On November 9, 2023, a pole camera was installed outside the SUBJECT PREMISES 1 by members of the USPIS and USPS-OIG technical security group. During the installation of the pole camera, technicians observed SUBJECT VEHICLE 1 pull into the driveway of the SUBJECT PREMISES 1, grab approximately six boxes from an unknown individual and place them in the right rear seat of the aforementioned vehicle. HSI Agents assisted with monitoring the camera and relayed the following activity at SUBJECT PREMISES 1:
- a. On November 11, 2023, SUBJECT VEHICLE 2 bearing RI registration RF197, was observed parked in the driveway at the SUBJECT PREMISES 1 (pictured below).



- b. On January 9, 2024, N. CIPRIANO was observed loading boxes into the back of a U-Haul truck bearing Arizona registration AE57977<sup>12</sup> (pictured below).

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<sup>12</sup> A review of records received from U-Haul pursuant to a Grand Jury subpoena revealed AZ registration AE57977 was rented by N. CIPRIANO on 1/6/2024 and returned on 1/10/2024.



- c. On January 22, 2024, VIGNEAU was observed removing boxes from N. CIPRIANO's vehicle and placing them in a white Dodge Challenger, believed to be SUBJECT VEHICLE 3<sup>13</sup>.
  - d. On January 22, 2024, two unknown black males, believed to be "cleaners," were observed carrying boxes from the garage.
  - e. On February 14, 2024, VIGNEAU and N. CIPRIANO were observed loading boxes into the back of the white Dodge Challenger believed to be SUBJECT VEHICLE 3<sup>14</sup>.
50. Pole camera footage from August 5, 2024, showed N. CIPRIANO and [REDACTED] continued to receive numerous packages at SUBJECT PREMISES 1 as described below:
- a. On August 5, 2024, at approximately 7:33AM, N. CIPRIANO is observed parking SUBJECT VEHICLE 2 in the driveway of SUBJECT PREMISES 1 and walking towards the rear of SUBJECT PREMISES 1. N. CIPRIANO is later observed approaching a U-Haul box truck that was parked in the driveway and is observed opening the rear door to the vehicle.
  - b. At approximately 10:04AM, [REDACTED] is observed parking SUBJECT VEHICLE 1 in the driveway of SUBJECT PREMISES 1 and walking towards the rear of SUBJECT PREMISES 1. [REDACTED] is later observed taking boxes from the rear of SUBJECT PREMISES 1 and placing them in the rear of SUBJECT VEHICLE 1. [REDACTED] is observed driving away shortly after.

<sup>13</sup> RI DMV records revealed Patrick VIGNEAU is registered to a 2016 white Dodge Challenger, [REDACTED], Cranston, RI, bearing RI registration 1EK361 (SUBJECT VEHICLE 3).

<sup>14</sup> As further detailed below, this is the same date that HSI made an undercover purchase from VIGNEAU's eBay storefront.



- c. At approximately 10:54AM, a UPS truck is observed parking in the driveway of SUBJECT PREMISES 1 and delivering numerous boxes in the driveway.
- d. Following this time, numerous boxes are placed in driveway of SUBJECT PREMISES 1 from the rear of the premises.
- e. At approximately 2:40PM, [REDACTED] is observed returning to SUBJECT PREMISES 1. At approximately 2:42PM, [REDACTED] is observed opening the rear trunk door of SUBJECT VEHICLE 2, removing a box and placing it in the backseat area of SUBJECT VEHICLE 1. [REDACTED] is observed entering SUBJECT VEHICLE 2 and leaving the premises.
- f. At 5:51PM, [REDACTED] is observed having returned to SUBJECT PREMISES 1 and taking numerous boxes and packages from the rear of the premises and placing them in the rear of SUBJECT VEHICLE 1. [REDACTED] is observed leaving the residence at approximately 5:58PM.
- g. At approximately 6:15PM, a UPS truck is observed parking in the driveway of SUBJECT PREMISES 1. At approximately 6:23PM, the UPS truck leaves the premises and many of the previously observed boxes are no longer visible in the driveway.
- h. At approximately 8:55PM, N. CIPRIANO is observed closing the U-Haul box truck rear door and leaving the premises in SUBJECT VEHICLE 2.

**SUBJECT PREMISES 2 ([REDACTED], Warwick, RI) and SUBJECT VEHICLE 2 (silver Nissan Rogue)**

- 51. SUBJECT PREMISES 2 is owned by N. CIPRIANO who purchased the property on January 10, 2005.
- 52. SUBJECT VEHICLE 2 is registered to N. CIPRIANO at SUBJECT PREMISES 2.
- 53. On February 6, 2024, a retroactive mail cover was initiated related to USPS mailings going to the SUBJECT PREMISES 2. That mail cover captured mail images between January 8, 2024, and February 6, 2024, including the following mail images:
  - a. On January 9, 2024, a TD Bank statement addressed to East Coast Deals One LLC at the SUBJECT PREMISES 2.
  - b. On January 10, 2024, a Citizens Bank statement addressed to N. CIPRIANO at the SUBJECT PREMISES 2.

- c. On January 17, 2024, a State of Rhode Island / Business Services Division correspondence addressed to Atlantic Coast Discounts LLC c/o N. CIPRIANO at the SUBJECT PREMISES 2.
  - d. On January 31, 2024, a Bank of America tax statement addressed to East Coast Deals One LLC at the SUBJECT PREMISES 2.
54. On August 23, 2024, a retroactive mail cover was initiated related to USPS mailings going to the SUBJECT PREMISES 2. That mail cover captured mail images between July 25, 2024, and August 23, 2024, including a mailing from the IRS addressed to East Coast Deals LLC, a mailing from Synchrony Bank addressed to N. CIPRIANO and a mailing from CPA Kevin Carter to Atlantic Coast Discounts c/o N. CIPRIANO. In addition, the mail cover captured mail to [REDACTED], [REDACTED] and who also has a vehicle registered to SUBJECT PREMISES 1. Both N. CIPRIANO and [REDACTED] are believed to reside at SUBJECT PREMISES 1.
55. UPS records show that 1,527 packages from various senders were sent to SUBJECT PREMISES 2 between January 4, 2021, and January 16, 2024. Of the 1,527 packages received, 259 of them were addressed to [REDACTED], 178 of them were addressed to [REDACTED] and 1,036 of them were addressed to N. CIPRIANO and/or East Coast Deals.
56. On August 6, 2021, a pole camera was installed outside the SUBJECT PREMISES 2 by the Rhode Island State Police. USPIS assisted with monitoring the camera and relayed the following information:
- a. On August 16, 2021, VIGNEAU was observed parked outside the SUBJECT PREMISES 2 and loading boxes into the back of a white Dodge Challenger, SUBJECT VEHICLE 3 (pictured below).



- b. On August 23, 2021, VIGNEAU and N. CIPRIANO were observed loading boxes into N. CIPRIANO's silver Nissan Rogue (pictured below), bearing RI registration RF197 (SUBJECT VEHICLE 2).



57. On or around June 24, 2022, the pole camera was removed by members of the USPIS technical security group after the camera's hard drive malfunctioned. On February 1, 2024, a pole camera was re-installed outside the SUBJECT PREMISES 2 by HSI tech enforcement officers. HSI Agents assisted with monitoring the camera and relayed the following information:
- a. On February 16, 2024, SUBJECT VEHICLE 2, bearing RI registration RF197, was observed parked in the driveway at the SUBJECT PREMISES 2.
58. On February 22, 2024, N. CIPRIANO was observed exiting the SUBJECT PREMISES 2 and departing in a silver Nissan Rogue believed to be SUBJECT VEHICLE 2 (pictured below).

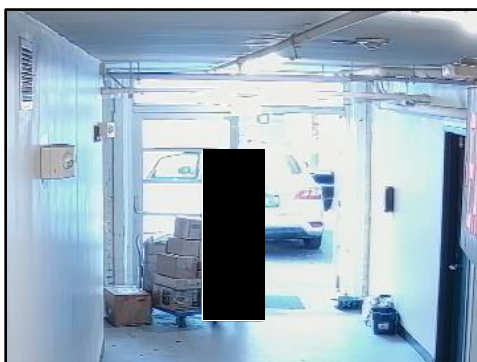


59. On August 17, 2024, during a surveillance of SUBJECT PREMISES 2, Investigators observed SUBJECT VEHICLE 2 parked in the driveway.
60. As noted above, the eBay storefront account Angie's Discount Store, is registered to [REDACTED] with a shipping address of SUBJECT PREMISES 2. Review of seller

account records received from eBay pursuant to a Grand Jury subpoena revealed 116,138 various items, totaling \$3,211,168, were sold via the eBay storefront account Angie's Discount Store between August 30, 2020, and December 22, 2023. A review of eBay account "Angie's Discount Store" online on August 22, 2024, revealed 2,365 items currently for sale including various beauty products, dietary supplements and OTC allergy medicines.

**SUBJECT PREMISES 3 (172 Exchange St, Room 001, Pawtucket, RI) and SUBJECT VEHICLE 1**

61. SUBJECT PREMISES 3 is believed to be a storage facility for stolen goods received by the conspiracy.
62. Pawtucket Armory Arts Center records show that [REDACTED] and N. CIPRIANO signed a lease agreement on October 18, 2022, for SUBJECT PREMISES 3.
63. On February 5, 2024, at approximately 4:20PM, interior surveillance cameras at SUBJECT PREMISES 3 captured [REDACTED] exiting Room 001 and loading boxes into the back seat of his vehicle (pictured below).



64. On February 8, 2024, at approximately 12:31PM, interior surveillance cameras at SUBJECT PREMISES 3 captured [REDACTED] entering Room 001 with a dolly fully of open boxes.
65. On February 15, 2024, at approximately 2:18PM, interior surveillance cameras at SUBJECT PREMISES 3 captured [REDACTED] entering Room 001 with a dolly full of open boxes (pictured below).



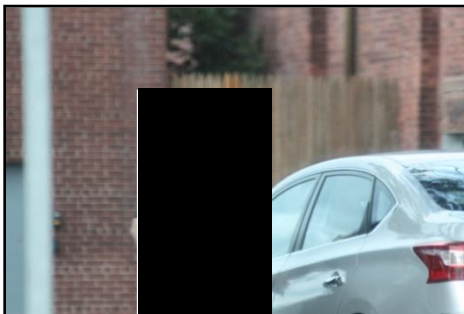
66. On August 27, 2024, at approximately 2:23PM, surveillance was conducted at SUBJECT PREMISES 3. Investigators observed SUBJECT VEHICLE 1 parked in the side parking lot. Investigators observed the [REDACTED] removing multiple large boxes from the SUBJECT VEHICLE 1 and bringing boxes inside the building through a side entrance (pictured below):



67. On August 27, 2024, at approximately 1:43PM, interior surveillance cameras at SUBJECT PREMISES 3 captured [REDACTED] entering Room 001 with several boxes. Furthermore, on the same date at 2:22PM, interior surveillance cameras captured [REDACTED] exiting Room 001 with a dolly full of boxes and satchels.
68. On August 28, 2024, at approximately 2:27PM, surveillance was conducted at SUBJECT PREMISES 3. Investigators observed the [REDACTED] exit a side entrance and depart in the SUBJECT VEHICLE 1 ultimately arriving a short time later at SUBJECT PREMISES 1. At approximately 2:40PM, the [REDACTED] was observed removing several large full plastic bags and boxes from the rear of the SUBJECT VEHICLE 1 and placing them in the driveway. At approximately 7:42PM, the [REDACTED] departed SUBJECT PREMISES 1 and arrived at 132 Almy St, Warwick,



RI. Property records revealed the owner of 132 Almy St, Warwick, RI as Emmanuel Payne.



69. On August 29, 2024, at approximately 6:50AM, surveillance was conducted at 132 Almy St, Warwick, RI. Investigators confirmed that the SUBJECT VEHICLE 1 was not parked at the residence and unable to be located.
70. On August 29, 2024, at approximately 5:16PM, surveillance was conducted at SUBJECT PREMISES 3. Investigators observed the [REDACTED] exit a side entrance and depart in the SUBJECT VEHICLE 1, ultimately arriving a short time later at [REDACTED], Warwick, RI. Property records revealed the owners of [REDACTED], Warwick, RI as [REDACTED].
71. On August 30, 2024, at approximately 5:00AM, surveillance was conducted at [REDACTED], Warwick, RI. Investigators confirmed that the SUBJECT VEHICLE 1 was still parked at the residence.

**SUBJECT PREMISES 4 ([REDACTED], Cranston, RI) and SUBJECT VEHICLE 3 (white Dodge Challenger)**

72. SUBJECT PREMISES 4 is the address listed on VIGNEAU's R.I. driver's license.
73. In addition, SUBJECT VEHICLE 3 is registered to VIGNEAU at SUBJECT PREMISES 4.
74. On February 5, 2024, a retroactive mail cover was initiated related to USPS mailings going to the SUBJECT PREMISES 4. That mail cover captured mail images between January 7, 2024, and February 5, 2024, including the following:
  - a. On January 7, 2024, a State of Rhode Island correspondence addressed to Patrick VIGNEAU at the SUBJECT PREMISES 4.
  - b. On January 11, 2024, a Cox statement addressed to Patrick VIGNEAU at the SUBJECT PREMISES 4.

- c. On January 23, 2024, a TD Bank statement addressed to Patrick VIGNEAU at the SUBJECT PREMISES 4.
  - d. On February 2, 2024, a Best Buy statement addressed to Patrick VIGNEAU at the SUBJECT PREMISES 4.
75. On August 23, 2024, a retroactive mail cover was initiated related to USPS mailings going to the SUBJECT PREMISES 4. That mail cover captured mail images between July 25, 2024, and August 23, 2024, including a mailing from the Social Security Administration addressed to P. VIGNEAU, a mailing from Bank of America addressed to P. VIGNEAU and a mailing from Cox Communications to P. VIGNEAU. In addition, the mail cover revealed mail that was addressed to June Ballou. VIGNEAU is believed to reside at SUBJECT PREMISES 4.
76. On February 15, 2024, during surveillance of SUBJECT PREMISES 4, Inspectors observed SUBJECT VEHICLE 3, bearing RI registration 1EK361, parked in the driveway (pictured below).

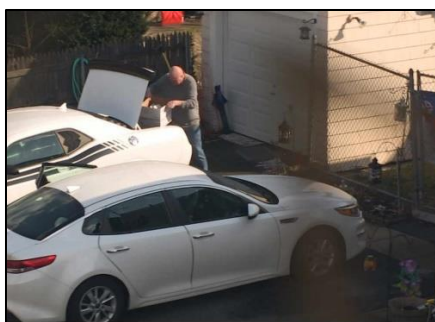


Inspectors observed VIGNEAU exit the residence momentarily before going back inside the residence.

77. On February 24, 2024, a pole camera was installed outside the SUBJECT PREMISES 4 by members of the USPIS and USPS-OIG technical security group. USPIS assisted with monitoring the camera and relayed the following information:
- a. On February 26, 2024, VIGNEAU was observed removing boxes and shipping supplies from the trunk of SUBJECT VEHICLE 3 and bringing them inside the SUBJECT PREMISES 4 (pictured below).



- b. On February 27, 2024, VIGNEAU was observed exiting the SUBJECT PREMISES 4 and placing a USPS Priority Mail package into the trunk of SUBJECT VEHICLE 3 (pictured below).



78. On August 17, 2024, during surveillance of SUBJECT PREMISES 4, Investigators observed SUBJECT VEHICLE 3, parked in the driveway.
79. As detailed below, eBay seller name patvig-11 was registered to VIGNEAU with a shipping address of SUBJECT PREMISES 4. A review of eBay account “patvig-11” (<https://www.ebay.com/usr/patvig-11>) on August 22, 2024, revealed 75 items currently for sale including various dietary supplements, probiotics, and OTC allergy medicines.

### **Retail and Corporate Investigations**

#### **A. Walmart Marketplace Investigation – JDC Wholesale**

80. In August of 2023, Investigators in this case were contacted by Walmart Loss Prevention regarding a customer complaint that was received related to the authenticity of a blood pressure monitor purchased through the Walmart Marketplace storefront, JDC Wholesale LLC<sup>15</sup>. The customer was concerned that the blood pressure monitor was either stolen or counterfeit. The customer stated the tracking number for their order indicated the item was shipped by N. CIPRIANO with an address of SUBJECT

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<sup>15</sup> The Walmart Marketplace allows a third-party seller to list his/her items on Walmart.com.

PREMISES 2. An open-source search of N. CIPRIANO by the customer revealed multiple state and federal arrests for receiving stolen property and trafficking counterfeit items<sup>16</sup>.

81. Further investigation by Walmart Loss Prevention revealed the Walmart e-commerce seller account, JDC Wholesale LLC, was registered to [REDACTED] with an address of SUBJECT PREMISES 1. The seller account was registered on September 30, 2022, but was suspended due to the ongoing customer complaint investigation on August 19, 2023, and eventually terminated from the Walmart Marketplace platform on September 26, 2023.
82. On August 19, 2023, shortly after seller account JDC Wholesale LLC was suspended, a person, identifying himself as [REDACTED], utilizing IP 72.192.32.64, reached out to Walmart customer service via their chat portal and stated the following:

*Hello,  
To whom it may concern my name is [REDACTED] and I am submitting a business plan to correct the errors I have made. First we have hired another employee to check all merchadise for store stickers as we buy mostly overstock and clearance items. Some examples are Homegoods, Rite Aid, and Walmart clearance. We also have retained a lawyer [REDACTED] to oversee any invoices or suppliers we purchase from are supplying proper merchadise for reselling. We also have updated shipstation to ship all items priority mail so our metric comes up to standard. Lastly we would like to offer our fullest apologies for any misunderstanding we may have caused the community. Please except our apology and plan to upgrade our proseller account to the best of standards.  
Thank You [REDACTED]*

83. A review of seller account records received from Walmart pursuant to a Grand Jury subpoena revealed 20,993 various health & beauty items, totaling \$595,288, were sold via the Walmart Marketplace account JDC Wholesale LLC, between October 1, 2022, and August 19, 2023.

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<sup>16</sup> A criminal history check for N. CIPRIANO includes a 2005 arrest by Warwick for receiving stolen property to which he was found guilty and sentenced to 10 years in prison. Additionally, in 2012, N. CIPRIANO was convicted of trafficking counterfeit goods to which he was sentenced to 5 years in prison.

84. Additionally, a review of IP records received from Walmart pursuant to a Grand Jury subpoena revealed multiple logins from Cox Communications IPv4<sup>17</sup> 72.192.32.64 between September 13, 2022, and August 30, 2023, using login ID [REDACTED]@gmail.com<sup>18</sup>. Records received from Cox Communications pursuant to a Grand Jury subpoena also revealed that on specific dates in question (9/30/22, 8/19/23, and 8/30/23), the listed IPv4 subscriber was [REDACTED] with an address of SUBJECT PREMISES 1.

B. Amazon Marketplace Investigation – JDC Wholesale and SUBJECT ACCOUNTS 1-2

85. On November 7, 2023, I inspected outbound USPS packages that were picked up from SUBJECT PREMISES 1 earlier that day. Upon inspection of the outbound packages, I observed a small box addressed to recipient DH in North Kingstown, RI, with a return address of JDC Wholesale, [REDACTED], Pawtucket, RI (SUBJECT PREMISES 1).
86. On November 13, 2023, I contacted DH regarding the aforementioned package and what it contained. DH stated that the package had not arrived yet, and due to multiple purchases on Amazon, was unsure what the package contained. DH agreed to contact me upon arrival of the aforementioned package. On November 15, 2023, DH texted me a photo of the aforementioned package advising me it just arrived at his residence. DH also texted a picture of the contents of the package revealing a bottle of Onnit Alpha Brand Memory & Focus pills. DH confirmed he placed the order and texted me a screenshot of the Amazon order.
87. A review of records received from Amazon pursuant to a Grand Jury subpoena revealed Amazon Marketplace name JDC Wholesale LLC was registered to [REDACTED] with

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<sup>17</sup> An Internet Protocol Version 4 address (or simply "IPv4 address") is a unique numeric address used by computers on the Internet. An IPv4 address is represented as four groups of two/three digits, separated by colons (:). Every computer attached to the internet must be assigned an IP address.

<sup>18</sup> [REDACTED]@gmail.com was also used as primary contact email when JDC Wholesale LLC was registered with the Walmart Marketplace on September 30, 2022.



an account address of SUBJECT PREMISES 1, a phone number of [REDACTED]-9769<sup>19</sup>, and an email address of [REDACTED]@gmail.com<sup>20</sup>. The payout account, SUBJECT ACCOUNT 1, was linked to a Capital One account but was changed to SUBJECT ACCOUNT 2 in November of 2022. The seller account was registered on July 21, 2022, and is still currently active.

88. Additional review of seller account records received from Amazon pursuant to a Grand Jury subpoena revealed 30,831 items, totaling \$1,392,281<sup>21</sup>, were sold via their Amazon Marketplace account JDC Wholesale LLC, between August 18, 2022, and December 5, 2023.
89. On or around January 22, 2024, as part of their internal business practices involving investigations into stolen goods, Amazon requested JDC Wholesale participate in an in-person interview (IPI). During these IPI's, Amazon looks to verify invoices, vet the seller's supply chain, determine who controls the account and ensure that the seller is aware of Amazon's terms & policies. JDC Wholesale then failed to schedule an IPI with Amazon resulting in the JDC Wholesale account being suspended.
90. A review of Amazon website for the storefront account "JDC Wholesale" on August 22, 2024, revealed 567 items currently for sale include pickleball paddles, dietary supplements, and various beauty products.<sup>22</sup>

C. Cyanotech (Nutrex) Investigation Re: JDC Wholesale LLC Selling Nutrex Products on Amazon Marketplace

91. On November 1, 2023, a USPS authorized mail cover was conducted on all mail pieces delivered to SUBJECT PREMISES 1 between October 4, 2023, and November 2, 2023. During a review of the mail cover images, two images of mail pieces were captured on 10/9/2023 and 10/24/2023, both of which were mailed from Nutrex Hawaii, Seller

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<sup>19</sup> A review of records received from T-Mobile pursuant to a Grand Jury subpoena revealed phone number [REDACTED]-9769 is an active account registered to N. CIPRIANO at SUBJECT PREMISES 2.

<sup>20</sup> A review of records received from Google pursuant to a Grand Jury subpoena revealed email [REDACTED]@gmail.com is an active account registered to [REDACTED].

<sup>21</sup> In stark contrast to the number of sales from JDC Wholesale LLC Amazon account, [REDACTED] only claimed \$44,837 in wages in 2022 as stated above.

<sup>22</sup> Amazon has not yet verified whether this account was reactivated after it was suspended.

Compliance, [REDACTED] and addressed to JDC Wholesale LLC, [REDACTED], Pawtucket, RI.

92. On November 21, 2023, I contacted MC, CEO of Cyanotech, via email regarding the mailings. Cyanotech produce and sell health products derived from microalgae. In order to maintain the integrity of their products, they search for e-commerce marketplaces that are selling their product without authorization and send cease and desist letters. MC confirmed the mail pieces in question were cease-and-desist letters demanding JDC Wholesale LLC stop selling their products via their Amazon marketplace page. MC confirmed JDC Wholesale never responded to the letters, nor did Cyanotech have any type of business relationship with JDC Wholesale. MC acknowledged that after several letters were sent to JDC Wholesale, their products were removed from the JDC Wholesale Amazon marketplace site on November 19, 2023.
93. MC confirmed that their products were considered high theft items and that in order to continue selling to Costco, his company was forced to change their packaging to combat the increase in thefts. MC was provided details of Nutrex products sold via the JDC Wholesale Walmart marketplace site and confirmed that the product in question (UPC 73289403518) is wholesale priced at \$27.17.
94. A review of seller account records received from Walmart pursuant to a Grand Jury subpoena revealed JDC Wholesale sold seven bottles of BioAstin Hawaiian Astaxanthin 12mg, as further detailed below, of Nutrex (UPC 73289403518) between June 5, 2023, and August 17, 2023, at prices below or just above wholesale price as shown below:

Walmart Merchant	Order Number	Order Date	Brand	UPC	Product Description	Price	Tax	Order Total
JDC Wholesale LLC	200011152469264	8/17/2023	Nutrex Hawaii	0073289403518	BioAstin Hawaiian Astaxanthin 12 mg	\$24.85	\$1.55	\$24.85
JDC Wholesale LLC	200011026637065	6/12/2023	Nutrex Hawaii	0073289403518	BioAstin Hawaiian Astaxanthin 12 mg	\$25.17	\$1.51	\$25.17
JDC Wholesale LLC	200010884249954	6/11/2023	Nutrex Hawaii	0073289403518	BioAstin Hawaiian Astaxanthin 12 mg	\$25.17	\$2.11	\$25.17
JDC Wholesale LLC	200010917055513	6/10/2023	Nutrex Hawaii	0073289403518	BioAstin Hawaiian Astaxanthin 12 mg	\$25.17	\$0.00	\$25.17
JDC Wholesale LLC	200010916273950	6/9/2023	Nutrex Hawaii	0073289403518	BioAstin Hawaiian Astaxanthin 12 mg	\$25.17	\$0.00	\$25.17
JDC Wholesale LLC	200011110948128	6/8/2023	Nutrex Hawaii	0073289403518	BioAstin Hawaiian Astaxanthin 12 mg	\$31.25	\$0.00	\$31.25
JDC Wholesale LLC	200011083213804	6/5/2023	Nutrex Hawaii	0073289403518	BioAstin Hawaiian Astaxanthin 12 mg	\$31.25	\$1.88	\$31.25

95. Notably, the same Nutrex product, BioAstin Hawaiian Astaxanthin 12mg, sells for \$49.99 at Costco<sup>23</sup>. Based upon my experience and the pricing of these Nutrex products well below the retail price, these Nutrex products are believed to be stolen.

<sup>23</sup> See <https://www.costco.com/bioastin-hawaiian-astaxanthin-12-mg.%2c-120-soft-gels.product.100096538.html>

D. Naperville (IL) PD Investigation

96. On August 29, 2023, officers from the Naperville PD in Illinois were dispatched to Costco regarding a retail theft in progress. A Costco Loss Prevention Agent had observed two suspected boosters in the store who had previously committed a retail theft of OTC allergy medications, from the same Costco location, on August 25, 2023. After getting a description of the offenders, officers were able to locate and detain the individuals exiting the store. During a search of the female, later identified as Lovenza MICLESCU, officers recovered 43 packages of the OTC allergy medication, Nasacort, totaling \$1,619.43, concealed in a makeshift silky cloth bag within her dress.
97. During an inventory search of MICLESCU's vehicle, officers recovered a large garbage bag containing similar OTC allergy medications along with a magnetic theft detection device remover located in the center console. Officers also recovered a notebook that contained handwritten ledger entries which listed quantities and dollar amounts for OTC medications and baby formula.
98. MICLESCU was arrested and transported to Naperville PD for processing. After reading and signing her Miranda Warning, MICLESCU consented to an interview. During the interview, MICLESCU admitted to stealing the OTC allergy medication from the Costco in Naperville on both dates. MICLESCU identified herself, along with her fiancé, later identified as [REDACTED], from photographs captured on each offense date. MICLESCU also identified herself from a still shot photograph captured from a theft of Enfamil and Similac baby formula, totaling \$2,234.84, that occurred at the Walmart in Harvard, IL on July 17, 2023. MICLESCU and [REDACTED] are both Romanian nationals and believed to be part of a traveling Romanian theft ring.
99. On September 6, 2023, the Honorable Micheal Burton, Dupage County Circuit Court, signed two state search warrants (2023SW002053 & 2023SW002054), authorizing the search of cell phones recovered during the arrest of MISLESCU and [REDACTED].
100. MICLESCU's phone extraction revealed multiple conversations with different individuals regarding the sale of stolen merchandise. One of the conversations, as detailed further below, was with [REDACTED].<sup>24</sup>

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<sup>24</sup> MICLESCU's text messages were sent to [REDACTED] email address, [REDACTED]@gmail.com.

101. Below is a summary of MICLESCU's and [REDACTED]'s conversation occurring on August 23, 2023, regarding the purchase, sale, and receipt of stolen merchandise:

*Mislescu: you get these*

*Mislescu: (sends pictures of various OTC allergy medications)*

*[REDACTED]: You work with Jon. Stay loyal.*

*Mislescu: I don't work with Jon, I don't know who she is, I work alone*

*[REDACTED]: You put the number in the box... the box came from them...you work with them*

*Mislescu: don't work with anyone, I'm on my own, that's why we put the number in the house box, I'll sell you the allergy medicines*

102. Images discovered on MICLESCU's phone included various UPS shipping labels with tracking numbers. A review of records received from UPS pursuant to a Grand Jury subpoena revealed the aforementioned tracking numbers all originated from a master account associated with and paid for by Norman CIPRIANO at SUBJECT PREMISES 1 with the sender "[REDACTED]" listed on the label and [REDACTED] listed as the receiver:

UPS TRACKING #	SENDER LISTED ON LABEL	RECEIVER LISTED ON LABEL	SENT	RECEIVED
[REDACTED] 0401	[REDACTED] Rolling Meadows, IL	[REDACTED] JDC Wholesale LLC Pawtucket, RI	8/8/2023	8/11/2023
[REDACTED] 5212	[REDACTED] Rolling Meadows, IL	[REDACTED] JDC Wholesale LLC Pawtucket, RI	8/8/2023	8/11/2023
[REDACTED] 8895	[REDACTED] Rolling Meadows, IL	[REDACTED] JDC Wholesale LLC Pawtucket, RI	8/8/2023	8/11/2023
[REDACTED] 4483	[REDACTED] Rolling Meadows, IL	[REDACTED] JDC Wholesale LLC Pawtucket, RI	8/8/2023	8/11/2023
[REDACTED] 9314	[REDACTED] Rolling Meadows, IL	[REDACTED] JDC Wholesale LLC Pawtucket, RI	8/8/2023	8/11/2023
[REDACTED] 2503	[REDACTED] Rolling Meadows, IL	[REDACTED] JDC Wholesale LLC Pawtucket, RI	8/8/2023	8/11/2023

103. Two additional images (pictured below) discovered on MISLESCU's phone, taken August 8, 2023, at 1:17PM and 1:18PM respectively, show various OTC beauty

products thrown into two large brown packing boxes. This is the same date that the six boxes, referenced above were sent to [REDACTED].



104. A review of seller account records received from Walmart pursuant to a Grand Jury subpoena revealed some of the products pictured above, including LaRoche Posay sunscreen and Vichy wrinkle corrector, were sold through the JDC Wholesale LLC Walmart storefront.

105. A review of records received from Block Inc. pursuant to a Grand Jury subpoena revealed, between August 19, 2023, and October 19, 2023, N. CIPRIANO (C\_nedncgycp & C\_f42aqhm7w<sup>25</sup>), sent eight peer-to-peer<sup>26</sup> (P2P) payments to “[REDACTED]” (C\_0eetd0yth<sup>27</sup>), the same name used on the UPS labels referenced above, totaling \$5,140. Additionally, on October 16, 2023, “[REDACTED]” (C\_0eetd0yth) sent one P2P payment for \$900 to N. CIPRIANO (C\_nedncgycp) which was deposited into SUBJECT ACCOUNT 3.

E. Brick Township (NJ) PD Investigation

106. On December 10, 2023, officers from the Brick Township PD in NJ were dispatched to Costco regarding a retail theft in progress. A Costco Loss Prevention Agent observed

<sup>25</sup> A review of records received from Block Inc. pursuant to a Grand Jury subpoena revealed Block account C\_f42aqhm7w & C\_nedncgycp are active accounts registered to Norman CIPRIANO, DOB: x/xx/1972, SSN: xxx-xx-[REDACTED] with a listed address of SUBJECT PREMISES 2.

<sup>26</sup> Peer-to-peer payments, or P2P, allow users to send and receive money from another person on their mobile devices through a linked bank account or card.

<sup>27</sup> A review of records received from Block Inc. pursuant to a Grand Jury subpoena revealed Block account C\_0eetd0yth, using the username “[REDACTED]” is an active account registered to [REDACTED], believed to be a crew boss, DOB: [REDACTED], SSN: [REDACTED] with a listed address of [REDACTED].



three suspected boosters in the store placing various items into a covered baby stroller. After getting a description of the offenders, officers were able to locate and detain the individuals as they exited the store. During a search of the female, later identified as Nicola DORINELA-IONELA, officers recovered 91 packages of OTC allergy medication, totaling \$3,381.09, concealed within a covered stroller. DORINELA-IONELA and the other two male accomplices were all arrested, processed, and released on a criminal summons with a pending court date.

107. A review of records received from BOA pursuant to a Grand Jury subpoena revealed, as further detailed below, between July 6, 2023, and January 4, 2024, twenty-one P2P payments were sent from SUBJECT ACCOUNT 2 to DORINELA-IONELA (BOA x6757) totaling \$86,021.

Date	Senders Name	Sender Bank	Sender Acct Number	Debit	Recipients Name	Recipient Bank	Recipient Acct Number
1/4/2024	JDC Wholesale LLC	Bank of America	██████████ 3476	\$10,200.00	dorinela-ionela	Bank of America	██████████ 6757
1/2/2024	JDC Wholesale LLC	Bank of America	██████████ 3476	\$3,012.00	dorinela-ionela	Bank of America	██████████ 6757
12/27/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$5,000.00	dorinela-ionela	Bank of America	██████████ 6757
12/26/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$4,000.00	dorinela-ionela	Bank of America	██████████ 6757
12/14/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$6,566.00	dorinela-ionela	Bank of America	██████████ 6757
12/8/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$1,200.00	dorinela-ionela	Bank of America	██████████ 6757
12/5/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$4,600.00	dorinela-ionela	Bank of America	██████████ 6757
11/29/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$1,260.00	dorinela-ionela	Bank of America	██████████ 6757
11/27/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$3,940.00	dorinela-ionela	Bank of America	██████████ 6757
11/22/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$5,000.00	dorinela-ionela	Bank of America	██████████ 6757
10/26/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$5,200.00	dorinela-ionela	Bank of America	██████████ 6757
10/25/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$9,049.00	dorinela-ionela	Bank of America	██████████ 6757
10/17/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$4,700.00	dorinela-ionela	Bank of America	██████████ 6757
10/16/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$2,500.00	dorinela-ionela	Bank of America	██████████ 6757
9/25/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$4,500.00	dorinela-ionela	Bank of America	██████████ 6757
9/20/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$5,000.00	dorinela-ionela	Bank of America	██████████ 6757
7/28/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$4,000.00	dorinela-ionela	Bank of America	██████████ 6757
7/24/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$1,000.00	dorinela-ionela	Bank of America	██████████ 6757
7/20/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$1,700.00	dorinela-ionela	Bank of America	██████████ 6757
7/10/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$1,835.00	dorinela-ionela	Bank of America	██████████ 6757
7/6/2023	JDC Wholesale LLC	Bank of America	██████████ 3476	\$1,759.00	dorinela-ionela	Bank of America	██████████ 6757

#### F. Tredyffrin Township (PA) PD Investigation

108. On May 29, 2020, officers from the Tredyffrin Township PD were dispatched to a CVS store in Tredyffrin Township, PA regarding a retail theft in progress. A CVS manager had reported a suspected booster, later identified as Lonnie FORD, fled the store on foot into a wooded area. Surveillance footage showed FORD placing OTC medications into a basket just prior to being interrupted by the CVS manager. Officers also observed FORD arriving in a Honda Civic that was still parked in the parking lot. A motor

vehicle records check revealed the vehicle was registered to FORD. A search of FORD's vehicle, pursuant to a state search warrant, revealed three CVS shopping bags containing multiple OTC allergy medications, cosmetics, and other products.

- a. A review of records received from Block Inc. pursuant to a Grand Jury subpoena revealed, between April 12, 2023, and July 18, 2023, N. CIPRIANO (C\_f42aqhm7w), sent sixty-one P2P payments to [REDACTED] (C\_0yd8c0mva<sup>28</sup>), a suspected "crew boss", totaling \$80,286. As further detailed below, [REDACTED], almost immediately after receiving the funds from N. CIPRIANO, took out a portion of those received funds for himself and sent the remaining amount to FORD (C\_09czwqmp5<sup>29</sup>). In total, [REDACTED] sent 37

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<sup>28</sup> A review of records received from Block Inc. pursuant to a Grand Jury subpoena revealed Block account C\_0yd8c0mva is an active account registered to [REDACTED], DOB: [REDACTED], SSN: [REDACTED] with a listed address of [REDACTED].

<sup>29</sup> A review of records received from Block Inc. pursuant to a Grand Jury subpoena revealed Block account C\_09czwqmp5 is an active account registered to Lonnie K. Ford, DOB: [REDACTED], SSN: [REDACTED] with a listed address of [REDACTED].

P2P payments to FORD totaling \$54,121.

DATE	AMOUNT	SENDER ACCT	SENDER NAME	RECEIVER ACCT	RECEIVER NAME
5/2/2023	\$ 1,352.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/2/2023	\$ 1,010.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
5/6/2023	\$ 3,591.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/6/2023	\$ 2,206.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
5/8/2023	\$ 1,197.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/8/2023	\$ 1,048.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
5/12/2023	\$ 1,734.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/12/2023	\$ 1,543.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
5/12/2023	\$ 1,945.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/12/2023	\$ 1,910.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
5/13/2023	\$ 524.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/13/2023	\$ 410.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
5/13/2023	\$ 1,904.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/13/2023	\$ 1,684.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
5/21/2023	\$ 1,663.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/21/2023	\$ 1,443.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
5/23/2023	\$ 1,924.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
5/23/2023	\$ 1,677.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
6/9/2023	\$ 4,290.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
6/9/2023	\$ 3,604.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
6/17/2023	\$ 2,090.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
6/17/2023	\$ 2,850.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
6/18/2023	\$ 4,613.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
6/18/2023	\$ 3,619.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
6/26/2023	\$ 3,045.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
6/26/2023	\$ 2,645.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
7/1/2023	\$ 3,854.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
7/1/2023	\$ 3,289.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
7/17/2023	\$ 3,180.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
7/17/2023	\$ 2,863.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD
7/18/2023	\$ 5,186.00	C_f42aqhm7w	N. CIPRIANO	C_0yd8c0mva	[REDACTED]
7/18/2023	\$ 4,025.00	C_0yd8c0mva	[REDACTED]	C_09czwqmp5	L. FORD

109. UPS records show that from May 12, 2023, to November 28, 2023, [REDACTED] sent 166 packages to [REDACTED] at SUBJECT PREMISES 2, of which 163 packages had a return address of [REDACTED]. Notably, a law enforcement database have both [REDACTED] and FORD associated with [REDACTED].
110. Based upon my experience and information acquired from this investigation, I believe CIPRIANO made payments to [REDACTED] a crew boss, for stolen products. After receiving the payments from CIPRIANO, [REDACTED] then paid a portion of these proceeds to FORD, who was likely the booster stealing the products.

G. eBay Storefront Investigation – Angie’s Discount Store

111. On December 19, 2023, I was contacted by a USPS employee, JL, regarding packages that were previously dropped off at the post office with a return address of 172

Exchange St, Mailbox 1, Pawtucket RI (SUBJECT PREMISES 3). After reviewing images of the packages that were dropped off, I requested the USPS employee hold one of the packages for further inspection.

112. On December 20, 2023, I retrieved the intercepted package for further inspection. Upon handling the package, I could feel, within the white outer packaging, a box uniquely shaped like a triangle, approximately 5" on each side and 16" in length. I attempted to contact the receiver '[REDACTED]', via telephone, to verify the contents of the package but was unsuccessful. Multiple Google searches of "triangle shaped boxes" and "beauty products", revealed a RIO hair straightener that appeared to have similar dimensions as the intercepted package.
113. Google searches for "RIO Hair Straightener" and "eBay" revealed multiple eBay storefronts selling similar products for various prices. While reviewing various eBay storefronts, I came across Angie's Discount Store<sup>30</sup>, located in Providence (RI), with a seller name of angecand\_87.
114. A review of records received from eBay pursuant to a Grand Jury subpoena revealed on December 16, 2023, '[REDACTED]' purchased a CHI Lava 1" Volcanic Ceramic Hair Iron for \$75.60 (including taxes & shipping) from eBay storefront angecand\_87. An open-source search of the CHI Lava Hair Iron revealed a triangular shaped box with similar dimensions as the intercepted package. Notably, a CHI Lava 1" Volcanic Ceramic Hair Iron sells for \$189.99 at the store Ulta Beauty<sup>31</sup>.
115. As stated above, eBay records revealed seller name angecand\_87 (Angie's Discount Store), was registered to [REDACTED] with a shipping address of SUBJECT PREMISES 2 and phone number that was registered to N. CIPRIANO at SUBJECT PREMISES 2. The payout account, SUBJECT ACCOUNT 9, was linked with Chase Bank (x3556) but changed to SUBJECT ACCOUNT 6 in September of 2021.

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<sup>30</sup> See [https://www.ebay.com/str/angiesdiscountstore?\\_pgn=2](https://www.ebay.com/str/angiesdiscountstore?_pgn=2)

<sup>31</sup> See <https://www.ulta.com/p/lava-ceramic-hairstyling-iron-xlsImpprod17891025?srltid=AfmBOopAOa7HmW4ShqBGTpGEkgXBoB-ecOVRer3ScS1W7MnTLV-0HQMR>

116. Additional review of seller account records received from eBay pursuant to a Grand Jury subpoena revealed 116,138 various items including health and beauty products, totaling \$3,211,168, were sold via the eBay storefront account Angie's Discount Store, between August 30, 2020, and December 22, 2023.
117. A review of the number of items sold (116,138) compared to the number of items listed (133,308) between August 30, 2020, and December 22, 2023, revealed a turnover rate of 87%. Based on my investigation, this rate is considerably higher than the average among e-commerce marketplaces for two reasons: (1) items being sold are in high demand and (2) items being sold are priced substantially below retail prices and their competitors. In comparison, a turnover rate of around 66% is ideal for most e-commerce businesses<sup>32</sup>.
118. A review of eBay account "Angie's Discount Store" on August 22, 2024, revealed 2,365 items currently for sale including various beauty products, dietary supplements and OTC allergy medicines.
119. Based upon my knowledge of ORC theft rings, stolen goods are sold at substantially lower prices, in order to unload the goods quicker and attract more customers. Accordingly, based upon my experience, the products sold on the eBay storefront account Angie's Discount store, such as the "CHI Lava 1" Volcanic Ceramic Hair Iron, are believed to be stolen.

H. Walmart Investigation – [REDACTED]

120. On December 21, 2023, Walmart Global Investigator MS contacted me regarding [REDACTED]. Investigator MS informed me, as further detailed below, that between March 6, 2022, and September 8, 2023, [REDACTED] has been involved in nineteen separate shoplifting incidents at a Walmart in Providence, RI, resulting in a loss of \$3,401.75 as detailed below:

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<sup>32</sup> <https://www.fulex.com/calculate-inventory-turnover-ratio/>



Date	Event Code	Location	Total Value	Items Recovered	Suspect
9/8/2023	E3490172	Walmart, 51 Silver Spring St, Providence, RI	\$130.92	Yes	██████████
7/4/2023	N/A	Walmart, 51 Silver Spring St, Providence, RI	\$707.43	Yes	██████████
6/17/2023	E2887138	Walmart, 51 Silver Spring St, Providence, RI	\$360.95	Yes	██████████
3/25/2023	E2339218	Walmart, 51 Silver Spring St, Providence, RI	\$116.28	No	██████████
2/8/2023	E2088159	Walmart, 51 Silver Spring St, Providence, RI	\$391.22	Yes	██████████
1/26/2023	E2025737	Walmart, 51 Silver Spring St, Providence, RI	\$847.64	Yes	██████████
1/26/2023	E2015782	Walmart, 51 Silver Spring St, Providence, RI	\$437.34	Yes	██████████
1/22/2023	E1996560	Walmart, 51 Silver Spring St, Providence, RI	\$672.62	Yes	██████████
1/18/2023	E1974392	Walmart, 51 Silver Spring St, Providence, RI	\$117.46	No	██████████
1/9/2023	E1929498	Walmart, 51 Silver Spring St, Providence, RI	\$393.85	Yes/No	██████████
11/20/2022	E1686448	Walmart, 51 Silver Spring St, Providence, RI	\$80.48	Yes	██████████
10/11/2022	E1479704	Walmart, 51 Silver Spring St, Providence, RI	\$94.00	Yes	██████████
5/17/2022	E869813	Walmart, 51 Silver Spring St, Providence, RI	\$4.97	Yes	██████████
5/10/2022	E843647	Walmart, 51 Silver Spring St, Providence, RI	\$67.30	Yes	██████████
4/26/2022	E794290	Walmart, 51 Silver Spring St, Providence, RI	\$265.30	No	██████████
4/10/2022	E794877	Walmart, 51 Silver Spring St, Providence, RI	\$59.62	No	██████████
3/8/2022	E621870	Walmart, 51 Silver Spring St, Providence, RI	\$38.69	No	██████████
3/7/2022	E615851	Walmart, 51 Silver Spring St, Providence, RI	\$85.55	No	██████████
3/6/2022	E621873	Walmart, 51 Silver Spring St, Providence, RI	\$95.24	No	██████████

121. On July 4, 2023, Providence PD were dispatched to Walmart (51 Silver Spring St, Providence, RI) for a 9-1-1 hangup. Upon arrival, officers were greeted by a Walmart Loss Prevention Agent who was just involved in a foot chase with a female shoplifter, later identified as ██████████. Walmart Loss Prevention Agents were able to recover most of the stolen products, totaling \$707.43. ██████████ was located a short time later by Providence PD and arrested for felony shoplifting. ██████████ entered a plea of nolo contendere and received a suspended sentence of 3 years and 3 years' probation.

#### I. Wilmette (IL) PD Investigation

122. An investigation by the Wilmette, Illinois PD revealed an ORC ring operating in Illinois involved in purchasing stolen products, removing identifying retail information from the products and then shipping the products to various third-party distributors or “diverters” throughout the country. Surveillances and undercover purchases revealed the Illinois ORC ring would resell the stolen items at storefronts they owned, along with shipping the stolen products to e-commerce “diverters” in California who would reintroduce these products back into the supply chain.<sup>33</sup>

123. On October 6, 2022, officers from the Wilmette PD, California Highway Patrol and other surrounding state and federal law enforcement agencies executed twelve search warrants both in and around Chicago and in California resulting in the recovery of \$7.5

<sup>33</sup> See <https://abc7chicago.com/retail-theft-organized-crime-ring-operation/12413709/>.

million dollars' worth of stolen retail products. Eight individuals, including Donald KIMBALL and Ahmed SALEM, were arrested on various state charges including money laundering, felony theft and continuing a financial crimes enterprise.

124. [REDACTED],

[REDACTED]

[REDACTED]

[REDACTED] KIMBALL ultimately pled guilty and was convicted of theft. SALEM ultimately pled guilty and was convicted of money laundering.

125. A review of account records received from UPS pursuant to a Grand Jury subpoena revealed, between May 23, 2021, and September 6, 2022, 49 packages were sent by N. CIPRIANO with the listed address as SUBJECT PREMISES 1 to SK Wholesale which is associated with KIMBALL<sup>35</sup> at [REDACTED]<sup>36</sup>, along with two other addresses associated with KIMBALL.

126. A review of account records received from PayPal pursuant to a Grand Jury subpoena revealed, as further detailed below, between June 3, 2021, and September 7, 2022, [REDACTED] received eighteen electronic payments via PayPal, totaling \$65,895.94 from Supreme Buybacks which is also associated with KIMBALL<sup>37</sup>. Furthermore, [REDACTED] sent fifteen electronic payments via PayPal, totaling \$2,824 to Source Kings associated with KIMBALL<sup>38</sup>. Associated with each electronic payment, there

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<sup>34</sup> A review of records received from Google pursuant to a Grand Jury subpoena revealed [REDACTED]@gmail.com is an active email account associated with [REDACTED]

<sup>35</sup> Notably, a LinkedIn webpage for Donald Kimball shows SK Wholesale listed as one of his work experiences where he lists his title as CEO. See <https://www.linkedin.com/in/donnie-kimball-9780b4184/>. LinkedIn is a business and employment-focused social media platform.

<sup>36</sup> USPS records revealed [REDACTED] is a post office address, and PO Box [REDACTED] was opened by Donald Kimball d/b/a Supreme Buybacks on 10/1/2019 and closed on 5/11/2023.

<sup>37</sup> See <https://www.bizapedia.com/ca/supreme-buybacks-llc.html> (listing KIMBALL as the registered agent for Supreme Buybacks). Bizapedia is an online platform that provides business information and company profiles for various businesses across the United States.

<sup>38</sup> See [https://opencorporates.com/companies/us\\_ca/201909410235](https://opencorporates.com/companies/us_ca/201909410235) (listing KIMBALL as an officer of Source Kings LLC). Open Corporates is a website that shares data on corporations under the copyleft Open Database License.

were multiple references to various OTC products including “claritin 60ct 5196”, “Zyrtec 90ct” and “Allegra 90ct” listed.

127. A review of account records received from UPS pursuant to a Grand Jury subpoena revealed, between January 17, 2021, and September 26, 2022, 441 packages were sent by N. CIPRIANO with the listed address as SUBJECT PREMISES 1. Of the 441 packages, 49 were sent to SMTT and 392 were sent to [REDACTED], the attention of SMTT LLC<sup>39</sup> at [REDACTED] and [REDACTED], respectively. According to the California Secretary of State website for business entities, SMTT is a suspended company with an address of [REDACTED] and registered agent of Ahmed SALEM.<sup>40</sup> As noted above, SALEM was convicted on Illinois state charges for money laundering. Further, as part of the Illinois state investigation, a search warrant was executed on [REDACTED], which is the residential address of SALEM’s brother. Approximately 191 items of suspected stolen product, totaling \$13,012.51, were seized from this residence.

128. A review of records received from Bank of America (BOA) and JP Morgan Chase (JPMC) pursuant to a Grand Jury subpoena revealed, as further detailed below, between March 31, 2021, and September 19, 2022, SMTT (Wells Fargo x2050) made twenty-one payments to East Coast Deals One LLC (via JP Morgan Chase x2290, BOA x5605 and BOA x4205) totaling \$386,640.50.

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<sup>39</sup> See <https://willcountysao.com/2022/11/glasgow-announces-indictments-of-10-individuals-in-multi-state-retail-theft-sting-operation-involving-an-estimated-7-5-million-of-retail-products/> and <https://willcountysao.com/wp-content/uploads/Fencing-Indictments-1-min.pdf> (Copy of the indictment related to stolen OTC items going to SMTT).

<sup>40</sup> See <https://bizfileonline.sos.ca.gov/search/business>.

DESCRIPTION	AMOUNT	PAYOR	BANK	ACCOUNT	PAYEE	BANK	ACCOUNT	STMT DATE
Wire In	\$ 23,316.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	31-Mar-2021
Wire In	\$ 14,008.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	31-Mar-2021
Wire In	\$ 15,430.50	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	31-Mar-2021
Wire In	\$ 40,000.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	30-Apr-2021
Wire In	\$ 26,400.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	28-May-2021
Wire In	\$ 20,000.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	30-Jun-2021
Wire In	\$ 16,893.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	30-Jun-2021
Wire In	\$ 25,000.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	30-Jul-2021
Wire In	\$ 10,000.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	JPMorgan Chase	x2290	31-Aug-2021
Wire In	\$ 15,000.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x4205	28-Sep-2021
Wire In	\$ 38,000.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	31-Oct-2021
Wire In	\$ 15,844.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	30-Nov-2021
Wire In	\$ 18,130.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	28-Feb-2022
Wire In	\$ 8,306.50	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	31-Mar-2022
Wire In	\$ 16,178.50	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	30-Apr-2022
Wire In	\$ 31,313.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	30-Jun-2022
Check Deposit	\$ 20,000.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	31-Jul-2022
Check Deposit	\$ 11,444.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	31-Aug-2022
Check Deposit	\$ 6,740.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	31-Aug-2022
Check Deposit	\$ 6,307.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	31-Aug-2022
th Check Deposit	\$ 8,330.00	SMTT LLC	Wells Fargo	x2050	East Coast Deals One LLC	Bank of America	x5605	30-Sep-2022

#### J. eBay Storefront Investigation – patvig-11

129. On January 18, 2024, Stop & Shop Asset Protection Investigator GD contacted me regarding possible stolen merchandise being sold on an eBay account associated with this investigation. GD stated he periodically searches online marketplaces, including eBay, for items stolen from Stop & Shop. While conducting one of these searches, he discovered an eBay account, identified as patvig-11, that listed various products for sale with competitor ORC stickers visible or crossed out with marker as shown below:



GD stated people involved in the sale of stolen merchandise often remove or cross out ORC stickers in an effort to divert attention by retail investigators who periodically conduct online marketplace searches. Additionally, some ORC stickers state that a specific product, if purchased elsewhere, may, in fact, be stolen.

130. A review of records received from eBay pursuant to a Grand Jury subpoena revealed seller name patvig-11 was registered to VIGNEAU with a shipping address of

SUBJECT PREMISES 4 and phone number of [REDACTED]-4631<sup>41</sup>. The payout account was linked to SUBJECT ACCOUNT 8 in March of 2021. The seller account was registered on September 18, 2020.

131. Additional review of seller account records received from eBay pursuant to a Grand Jury subpoena revealed 6,810 various items, totaling \$200,660, were sold via the eBay storefront account patvig-11, between September 23, 2020, and January 18, 2024.
132. A review of eBay account “patvig-11” (<https://www.ebay.com/usr/patvig-11>) on August 22, 2024, revealed 75 items currently for sale including various dietary supplements, probiotics, and OTC allergy medicines.

### Undercover Buys

133. On December 4, 2023, HSI Agents conducted an undercover purchase from seller JDC Wholesale on Amazon.com, linked to SUBJECT ACCOUNT 1, for three products totaling \$80.10. On December 12, 2023, HSI Agents received the purchased products, shipped from JDC Wholesale LLC at SUBJECT PREMISES 1 which contained the following items:
  - a. Primatene Mist Epinephrine Inhalation Aerosol (11.7g) - JDC Wholesale Amazon Price: \$27.98
  - b. Nugenix Men’s Daily Testosterone Multivitamin (60 tablets) - JDC Wholesale Amazon Price: \$34.50
  - c. Nasonex 24HR Allergy Nasal Spray (60 Sprays) - JDC Wholesale Amazon Price: \$12.90
134. Online searches of the aforementioned items revealed the following: Primatene Mist (11.7g) retails for \$32.49 at CVS and \$31.99 at Target. Nugenix Men’s Daily Testosterone Multivitamin (60 tablets) retails for \$49.99 on GNC and \$39.99 on Rite Aid. Nasonex 24Hr Allergy Nasal Spray (60 Spray) retails for \$18.99 at CVS and \$14.29 at Target.
135. On February 14, 2024, HSI Agents conducted an undercover purchase from seller patvig-11 on eBay.com for three products as detailed below totaling \$26.55<sup>42</sup>. On

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<sup>41</sup> A review of records received from T-Mobile pursuant to a Grand Jury subpoena revealed phone number [REDACTED]-4631 is an active account registered to VIGNEAU, [REDACTED], West Warwick, RI.

<sup>42</sup> The three products all purchased for \$26.55 were part of a bundle, not purchased individually.



February 23, 2024, HSI Agents received the purchased products, shipped from Patrick VIGNEAU, [REDACTED], Cranston, RI (SUBJECT PREMISES 4) which contained the following items:

- a. (2) Nasacort 24HR Allergy Nasal Sprays (120 Sprays)
- b. (1) Nasacort 24HR Allergy Nasal Spray (240 Sprays) which appeared to have the remnants of a sticker that had been removed from the packaging.

136. Online searches of the aforementioned items revealed the following: Nasacort 24HR Allergy Nasal Spray (240 Sprays) is advertised for \$39.49 at CVS, \$35.49 at Stop and Shop and \$45.99 at Target. Nasacort 24HR Allergy Nasal Spray (120 Sprays) is advertised for \$22.49 (on sale from \$24.99) at CVS, and \$25.49 at Target. Thus, the retail price of these purchased items would have been at least \$80.47 at retail. Thus, the price of the 3-pack bundle was significantly less than what would have been paid had they been purchased separately from a retailer.
137. Based upon the fact that these items were sold for much less than their retail price and from my experience, I believe these purchased items from JDC Wholesale and VIGNEAU were stolen.

**Surveillance Capturing [REDACTED] mailing numerous packages at US Post Office, 24 Corliss St, Providence, RI**

138. On December 26, 2023, interior surveillance cameras at the USPS Corliss Post Office captured [REDACTED] mailing various packages at approximately 7:00PM, and N. CIPRIANO dropping off mail sacks containing packages at approximately 8:00PM.
139. On December 29, 2023, interior surveillance cameras at the USPS Corliss Post Office captured [REDACTED] mailing various packages at approximately 4:30PM.
140. On February 1, 2024, during surveillance of the USPS Corliss Post Office, Inspectors observed SUBJECT VEHICLE 1, parked in the customer parking lot. Inspectors observed [REDACTED] removing multiple sacks containing various packages from his vehicle, placing the sacks into a hamper, and bringing the hamper containing the sacks inside the Post Office. Interior surveillance cameras at the USPS Corliss Post Office and USPS records shows [REDACTED] dropping off a total of 104 packages (pictured below).



USPS packing slips for these 104 packages show the shipper names listed as either [REDACTED] or [REDACTED]. A short time later, [REDACTED] is observed exiting the Post Office empty handed.

### **Bank Account Information (SUBJECT ACCOUNTS 2-7)**

#### **SUBJECT ACCOUNT 2 – JDC Wholesale** [REDACTED]

141. BOA records revealed that SUBJECT ACCOUNT 2 was opened by [REDACTED] on July 20, 2022, in the name JDC Wholesale LLC. The mailing address for the account was listed as SUBJECT PREMISES 1, and employee identification number matching [REDACTED], was provided on the account opening documents. Additionally, signatory authority was assigned to [REDACTED] who listed his title as “member” on the account opening paperwork.
142. A review of SUBJECT ACCOUNT 2 revealed credits to the account totaled \$1,351,822 during the period 9/13/2022 -10/2/2023, of which, \$797,198 (59%) was derived from Amazon sales and \$529,794 (39.2%) was derived from Walmart sales. Additionally, during the same time period, debits to the account totaled \$1,118,927, of which, \$125,000 (11.1%) went to N. CIPRIANO dba East Coast Deals One, and \$52,678 (4.7%) went to DORINELA-IONELA. As elaborated above, DORINELA-IONELA was arrested on December 10, 2023, by Brick Township PD in NJ after they found 91 packages of OTC allergy medication, totaling \$3,381.09, concealed within a covered stroller as DORINELA-IONELA was exiting a Costco store.
143. In addition, between December 28, 2022, and June 15, 2023, four transfers totaling \$125,000 were made from SUBJECT ACCOUNT 2 into SUBJECT ACCOUNT 4 (East Coast Deals) as shown below:

Date	Debit Institution	Debit Account	Name	Credit Institution	Credit Account	Name	Amount	Description
12/28/2022	BOA	x3476	JDC Wholesale	BOA	x5605	East Coast Deals	\$30,000.00	Check Deposit
3/1/2023	BOA	x3476	JDC Wholesale	BOA	x5605	East Coast Deals	\$40,000.00	Check Deposit
3/15/2023	BOA	x3476	JDC Wholesale	BOA	x5605	East Coast Deals	\$30,000.00	Check Deposit
6/15/2023	BOA	x3476	JDC Wholesale	BOA	x5605	East Coast Deals	\$25,000.00	On-Line Transfer

144. Between November 30, 2022, and October 18, 2023, twelve checks written from SUBJECT ACCOUNT 2 totaling \$15,000, were made payable to the Pawtucket Armory Arts Center with the word “rent” written on most of the memo lines, and subsequently withdrawn from SUBJECT ACCOUNT 2. As noted above, records received from the Pawtucket Armory Arts Center revealed [REDACTED] and N. CIPRIANO signed a lease agreement on October 18, 2022, for SUBJECT PREMISES 3.

**SUBJECT ACCOUNT 3 – N. CIPRIANO & [REDACTED]**

145. BOA records revealed that SUBJECT ACCOUNT 3 was opened by N. CIPRIANO on July 23, 2022, in the names Norman [REDACTED] Cipriano. The mailing address for the account was listed as SUBJECT PREMISES 2, and real social security numbers for both N. CIPRIANO and [REDACTED] were provided on the account opening documents. Additionally, signatory authority was assigned to both N. CIPRIANO and [REDACTED] on March 23, 2022.

146. A review of SUBJECT ACCOUNT 3 revealed credits to the account totaled \$617,022 during the period 7/23/2022 -10/6/2023, of which, \$150,000 (24.3%) was derived from East Coast Deals One LLC, \$62,603 (10.1%) was derived from Zelle transfers, and \$297,897 (48.2%) was derived from suspected diverters/companies associated with diverters, including SMTT. Additionally, during the same time period, debits to the account totaled \$607,588, of which, \$148,600 (24.4%) went to suspected boosters and co-conspirators, including VIGNEAU.

147. Further review of SUBJECT ACCOUNT 3 revealed fifteen payroll deposits totaling \$16,675 (2.7%) were made between September 23, 2021, and December 30, 2021. Additionally, between January 5, 2022, and May 12, 2022, Massachusetts Department of Unemployment Assistance (MA DUA) revealed nineteen tax refund deposits totaling \$18,124 (2.9%) for N. CIPRIANO.

**SUBJECT ACCOUNT 4 – East Coast Deals One (N. CIPRIANO)**

148. BOA records revealed that SUBJECT ACCOUNT 4 was opened by N. CIPRIANO on October 2, 2021, in the name East Coast Deals One LLC. The mailing address for the account was listed as SUBJECT PREMISES 2, and employee identification number, matching N. CIPRIANO, was provided on the account opening documents.

Additionally, signatory authority was assigned to both [REDACTED], listed as “signer”, and N. CIPRIANO, listed as “manager”, on March 7, 2022.

149. A review of SUBJECT ACCOUNT 4 revealed that credits to the account totaled \$5,808,379 during the period 10/4/2021 -11/3/2023, of which, \$4,255,322 (73.3%) came from suspected diverters/companies associated with diverters, including SMTT. Additionally, during the same time period, debits to the account totaled \$5,561,473, of which, \$3,904,606 (70.3%) went to suspected boosters and co-conspirators, including those with Romanian names.

**SUBJECT ACCOUNT 5 – [REDACTED]**

150. TD Bank records revealed that SUBJECT ACCOUNT 5 was opened by [REDACTED] on June 21, 2021, in the name [REDACTED]. The mailing address for the account was initially listed as [REDACTED], but was later changed to SUBJECT PREMISES 1 in January 2023. A Rhode Island driver’s license (RIDL) number, matching [REDACTED], was provided on the account opening documents.
151. A review of SUBJECT ACCOUNT 5 revealed credits to the account totaled \$106,921 during the period 6/24/2021-11/13/2023, of which, \$25,808 (24.1%) was derived from eBay sales and \$57,235 (53.5%) was derived from ATM deposits. Additionally, during the same time period, debits to the account totaled \$106,105, of which, \$24,705 (23.3%) went to Venmo and Cash App money transfers.

**SUBJECT ACCOUNT 6 – [REDACTED]**

152. TD Bank records revealed that TD Bank account x1730 was opened on May 31, 2017, in the name [REDACTED]. TD Bank account x1730 changed to SUBJECT ACCOUNT 6 in September 2021. The mailing address for the account was initially listed as [REDACTED], but changed to [REDACTED] in August 2021. The real social security number for [REDACTED] was provided on the account opening documents.
153. A review of TD Bank account x1730/SUBJECT ACCOUNT 6 revealed credits to the account totaled \$1,979,167 during the period 5/31/2017-12/22/2023, of which, \$1,855,643 (93.8%) was derived from eBay sales associated with Angie’s Discount Store and \$104,552 (5.3%) were derived from PayPal money transfers, including \$65,895.94 from KIMBALL. As detailed above, between June 3, 2021, and September

7, 2022, [REDACTED] received eighteen electronic payments via PayPal, totaling \$65,895.94 from KIMBALL who was convicted of theft on 12/27/2023. Additionally, during the same time period, debits to the account totaled \$1,941,488, of which, \$328,737 (16.9%) went to PayPal money transfers and \$1,523,381 (79.3%) to suspected co-conspirators.

154. A review of SUBJECT ACCOUNT 6 revealed two checks were made payable to [REDACTED] one in the amount of \$645 on April 18, 2022, and a second in the amount of \$690 on April 29, 2022. Further review of SUBJECT ACCOUNT 5 ([REDACTED]) revealed a cash deposit in the amount of \$645 was conducted on April 18, 2022, followed by a second cash deposit of \$690 on April 29, 2022.

**SUBJECT ACCOUNT 7 – Atlantic Coast Discounts (N. CIPRIANO)**

155. TD Bank records revealed that SUBJECT ACCOUNT 7 was opened by N. CIPRIANO on September 28, 2023, in the name Atlantic Coast Discounts LLC. The mailing address for the account was listed as SUBJECT PREMISES 2, and an employee identification number, matching N. CIPRIANO, was provided on the account opening documents.
156. A review of SUBJECT ACCOUNT 7 revealed credits to the account totaled \$17,095 during the period 9/28/2023-10/18/2023, of which, \$16,995 (99.4%) was derived from eBay sales. Additionally, during the same time period, debits to the account totaled \$851, of which, \$803 (94.4%) were ATM cash withdrawals.

**SUBJECT ACCOUNT 8 – Patrick VIGNEAU**

157. TD Bank records revealed that SUBJECT ACCOUNT 8 was opened on March 26, 2021, in the name Patrick VIGNEAU. The mailing address for the account was listed as SUBJECT PREMISES 4, and the real social security number for VIGNEAU was provided on the account opening documents.
158. A review of SUBJECT ACCOUNT 8 revealed credits to the account totaled \$116,519 during the period 3/26/2021-1/24/2024, of which, \$113,224 (97.2%) were derived from eBay sales associated with VIGNEAU's eBay seller account patvig-11. Additionally, during the same time period, debits to the account totaled \$116,468, of which, \$67,751 (58.1%) were transfers to two other TD Bank accounts maintained by VIGNEAU.

**SUBJECT FUNDS IN SUBJECT ACCOUNTS 1-9**



159. Notably, N. CIPRIANO, [REDACTED], and VIGNEAU's reported income does not reflect the sheer volume of money going into SUBJECT ACCOUNTS 1-10. Based upon my training and experience, those engaging in illicit activity do not report fully report the income they obtained from the illicit activity to avoid detection from law enforcement and/or probation officers if the individuals are on supervised release such as was the case with VIGNEAU. As further detailed herein, deposits and credits to the accounts in question exceed \$12.3 million dollars with tax records revealing \$543,395 in reported income during 2019 to 2022.
160. In addition, money from these SUBJECT ACCOUNTS 2-8 were transferred to SMTT and DORINELA-IONELA who have a past history and/or were associated with diverters convicted for retail theft/possession of stolen property/money laundering in other states.
161. Based on the above including wage records, online sales, surveillance, undercover buys, as well as my training and experience with ORC theft rings, there is probable cause to believe SUBJECT FUNDS in SUBJECT ACCOUNTS 1-9 were proceeds of interstate transportation of stolen property and money involved in money laundering.

#### **IV. INTERSTATE TRANSPORTATION STOLEN PROPERTY/MONEY LAUNDERING OFFENSES**

162. Based on my training and experience and familiarity with investigations into fraud conducted by other law enforcement agents, I know the following:
- a. Individuals involved in ORC theft may have several storage facilities for their stolen goods due to the volume of product and also to evade detection from law enforcement. Here, there is probable cause to believe that the SUBJECT PREMISES 1-4 were used to store and move stolen product during the course of the conspiracy.
  - b. Individuals maintain in their homes, businesses, and vehicles, both in paper and electronic format, among other items, records regarding the receipt and expenditure of money, documents relating to the purchase of assets, and records pertaining to their employment or business. Similarly, given the nature of the interstate transportation of stolen property/fraud/money laundering, based on my training and experience, I believe that participants in a long running ORC scheme

that involves several participants, more often than not, will keep records containing names, addresses, email addresses, and telephone numbers of co-conspirators, as well as targets and victims, amounts received from them, and amounts sent to co-conspirators. These records are necessary to further the interstate transportation of stolen property/illicit fraud/money laundering business and can be found in paper form or stored electronically in cell phones and other electronic devices. Owing to the long-term usefulness of such items, and tracking relative proceeds among co-conspirators, this type of evidence would likely be generated, maintained, and then possibly forgotten about and not disposed of.

- c. There are many reasons why criminal offenders maintain evidence for long periods of time. First, to the offender, the evidence may seem innocuous at first glance (e.g. financial, credit card and banking documents, travel documents, receipts, documents reflecting purchases of assets, personal calendars, telephone and address directories, checkbooks, videotapes and photographs, utility records, ownership records, letters and notes, tax returns and financial records, escrow files, telephone and pager bills, keys to safe deposit boxes, packaging materials, computer hardware and software). To law enforcement, however, such items may have significance and relevance when considered in light of other evidence. Second, the criminal offender may no longer realize he/she still possesses the evidence or may believe law enforcement could not obtain a search warrant to seize the evidence. The criminal offender may also be under the mistaken belief that he/she has deleted, hidden, or further destroyed computer-related evidence, which in fact, may be retrievable by a trained forensic computer expert. Thus, records and ledger-type evidence that one would think a prudent person might destroy because of its incriminatory nature are sometimes still possessed months or even years after the records were created.
- d. From training and experience I know that individuals who amass proceeds from illegal activities routinely attempt to further that conduct and/or conceal the existence and source of their funds by engaging in financial transactions with domestic and foreign institutions, and others, through all manner of financial instruments, including cash, cashier's checks, money drafts, traveler's checks,

wire transfers, etc. Records of such instruments are oftentimes maintained at the individual's residence, business, or some other place over which they maintain dominion and control.

- e. In addition, during the course of such residential and business searches, I and other agents have also found items of personal property that tend to identify the person(s) in residence or business, occupancy, control, or ownership of the premise(s), vehicle(s), and computer devices located therein. Such identification evidence is typical of the articles people commonly maintain in their residences or businesses, such as canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys.

## **V. DIGITAL DEVICES**<sup>43</sup>

163. Based on the information above, there is probable cause to believe that in furtherance of the specified offenses N. CIPRIANO, [REDACTED], VIGNEAU and/or other co-conspirators: (1) communicated with one another, (2) used e-commerce sites such Walmart Marketplace, Amazon Marketplace, and eBay; (3) took photographs of the suspected stolen product; (4) posted photographs of the suspected stolen product on e-commerce sites; (5) sent electronic messages to include photographs of the suspected stolen product to each other; (6) used digital devices to create mailing labels to ship the products; (7) routed funds; and (8) moved packages to different locations. Notably, [REDACTED] communicated with co-conspirator MISLESCU using texting applications; and common sense and experience from other investigations advises that conspiracies tend to involve communications between co-conspirators, at a minimum for planning and coordination purposes. N. CIPRIANO, [REDACTED], VIGNEAU and/or other co-conspirators were involved in acquiring and/or transporting suspected

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<sup>43</sup> As used herein, the term "digital device" includes any electronic system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, notebook, and tablet computers; personal digital assistants; wireless communication devices, such as paging devices, mobile telephones, and smart phones; digital cameras; gaming consoles; peripheral input/output devices, such as keyboards, printers, scanners, monitors, and drives; related communications devices, such as modems, routers, cables, and connections; storage media; and security devices.

stolen product. Common sense and experience from other investigations advises that such activities involve planning and the execution of multiple steps, and that note-taking would not be uncommon in such endeavors to document product information, inventory, and sales. Thus, common sense and experience from other investigations advises that in such endeavors it would not be uncommon for photographs and videos to be used to record and communicate activities with other co-conspirators and to promote sales of the products. Here, the co-conspirators used bank accounts and e-commerce accounts as well. Further, common sense and experience advise that in such endeavors the utilization of internet searches would not be uncommon, as such tools are common means to search for product pricing information, and to learn the security practices of common retailers so as to evade detection. In addition, surveillance shows that co-conspirators moved packages to various premises for storage.

164. Based on my training and experience, I know that cellular telephones can be used
  - a. for voice, text, and email communications, through utilization of pre-loaded communications applications or other user-loaded applications that provide similar functionalities, such as WhatsApp;
  - b. for planning, coordination, and recording notes, through utilization of pre-loaded calendar, voice memo, note, and to-do list applications or other user-loaded applications that provide similar functionalities, for performing internet searches, through utilization of pre-loaded search and browsing applications or other user-loaded applications that provide similar functionalities;
  - c. for photography, videography, and photo and video storage (i.e. albums), through utilization of pre-loaded camera and album applications or other user-loaded applications that provide similar functionalities;
  - d. for routing funds and managing funds, through utilization of banking, cryptocurrency, and shopping applications, including e-commerce applications, and
  - e. for storing password information necessary to review or access applications and accounts.
165. From my training and experience, I know that various cellular telephone applications – both pre-loaded or user loaded – record the cellular telephone’s geographic location

(and thereby the user's geographic location) and maintain logs of communications, such as call logs. From my training and experience, I know that a variety of pre-loaded and user-loaded applications on cellular telephones contain information that can aid in identifying the user of the cellular device. For example, such user attribution information can be found in photographic records, videographic records, voice messages, emails, texts, geolocation data, notes, calendars, to-do lists, maps, financial applications, shopping applications, and search and browsing records. From my training and experience, I know that I.P. information is commonly found in cellular telephones and can identify geographic locations used by co-conspirators, which in turn can aid in identifying co-conspirators and identifying storage locations for the stolen products.

166. Based upon my experience and training, I know that electronic devices can store information for long periods of time. This information includes communication records, phone (and thereby user) geolocation data, notes, calendar records, to-do list records, records that can be used for user attribution, map data, photographs, videos, albums, financial data, and shopping records. Similarly, things that have been viewed via the internet are typically stored for some period of time on the devices. This information can sometimes be recovered with forensics tools.
167. Based on my experience and training, I know that electronic devices can contain software that allows others to control the devices and can also contain malicious software designed to impede evidence collection. Accordingly, I believe that there is probable cause to search for such software on the devices.

## **VI. COMPUTERS, ELECTRONIC STORAGE, AND FORENSIC ANALYSIS**

168. As described above and in Attachment B, this application seeks permission to search for records that might be found on the SUBJECT PREMISES, in whatever form they are found. One form in which the records might be found is data stored on a computer's hard drive or other storage media. Thus, the warrant applied for would authorize the seizure of electronic storage media or, potentially, the copying of electronically stored information, all under Rule 41(e)(2)(B).

169. I submit that if a computer or storage medium is found on the SUBJECT PREMISES, there is probable cause to believe those records will be stored on that computer or storage medium, for at least the following reasons elaborated below.

170. Based on my training, experience, and information from those involved in the forensic examination of digital devices, I know that the following electronic evidence, inter alia, is often retrievable from digital devices:

- a. Forensic methods may uncover electronic files or remnants of such files months or even years after the files have been downloaded, deleted, or viewed via the Internet. Normally, when a person deletes a file on a computer, the data contained in the file does not disappear; rather, the data remain on the hard drive until overwritten by new data, which may only occur after a long period of time. Similarly, files viewed on the Internet are often automatically downloaded into a temporary directory or cache that are only overwritten as they are replaced with more recently downloaded or viewed content and may also be recoverable months or years later.
- b. Digital devices often contain electronic evidence related to a crime, the device's user, or the existence of evidence in other locations, such as, how the device has been used, what it has been used for, who has used it, and who has been responsible for creating or maintaining records, documents, programs, applications, and materials on the device. That evidence is often stored in logs and other artifacts that are not kept in places where the user stores files, and in places where the user may be unaware of them. For example, recoverable data can include evidence of deleted or edited files; recently used tasks and processes; online nicknames and passwords in the form of configuration data stored by



browser, e-mail, and chat programs; attachment of other devices; times the device was in use; and file creation dates and sequence.

- c. The absence of data on a digital device may be evidence of how the device was used, what it was used for, and who used it. For example, showing the absence of certain software on a device may be necessary to rebut a claim that the device was being controlled remotely by such software.
  - d. Digital device users can also attempt to conceal data by using encryption, steganography, or by using misleading filenames and extensions. Digital devices may also contain “booby traps” that destroy or alter data if certain procedures are not scrupulously followed. Law enforcement continuously develops and acquires new methods of decryption, even for devices or data that cannot currently be decrypted.
  - e. I know that when an individual uses a computer to sell stolen products, the individual’s computer will generally serve both as an instrumentality for committing the crime, and also as a storage medium for evidence of the crime. The computer is an instrumentality of the crime because it is used as a means of committing the criminal offense. The computer is also likely to be a storage medium for evidence of crime. From my training and experience, I believe that a computer used to commit a crime of this type may contain data that is evidence of how the computer was used; data that was sent or received; notes as to how the criminal conduct was achieved; records of Internet discussions about the crime; and other records that indicate the nature of the offense.
171. Based on my training, experience, and information from those involved in the forensic examination of digital devices, I know that it is not always possible to search devices for data during a search of the premises for a number of reasons, including the following:
- a. Digital data are particularly vulnerable to inadvertent or intentional modification or destruction. Thus, often a controlled environment with specially trained personnel may be necessary to maintain the integrity of and to conduct a complete and accurate analysis of data on digital devices, which may take substantial time, particularly as to the categories of electronic evidence referenced above. Also,

there are now so many types of digital devices and programs that it is difficult to bring to a search site all of the specialized manuals, equipment, and personnel that may be required.

- b. Digital devices capable of storing multiple gigabytes are now commonplace. As an example of the amount of data this equates to, one gigabyte can store close to 19,000 average file size (300kb) Word documents, or 614 photos with an average size of 1.5MB.

172. *Necessity of seizing or copying entire computers or storage media.* In most cases, a thorough search of a premises for information that might be stored on storage media often requires the seizure of the physical storage media and later off-site review consistent with the warrant. In lieu of removing storage media from the premises, it is sometimes possible to make an image copy of storage media. Generally speaking, imaging is the taking of a complete electronic picture of the computer's data, including all hidden sectors and deleted files. Either seizure or imaging is often necessary to ensure the accuracy and completeness of data recorded on the storage media, and to prevent the loss of the data either from accidental or intentional destruction. This is true because of the following:

- a. The time required for an examination. As noted above, not all evidence takes the form of documents and files that can be easily viewed on site. Analyzing evidence of how a computer has been used, what it has been used for, and who has used it requires considerable time, and taking that much time on premises could be unreasonable. As explained above, because the warrant calls for forensic electronic evidence, it is exceedingly likely that it will be necessary to thoroughly examine storage media to obtain evidence. Storage media can store a large volume of information. Reviewing that information for things described in the warrant can take weeks or months, depending on the volume of data stored, and would be impractical and invasive to attempt on-site.
- b. Technical requirements. Computers can be configured in several different ways, featuring a variety of different operating systems, application software, and configurations. Therefore, searching them sometimes requires tools or knowledge that might not be present on the search site. The vast array of computer hardware

and software available makes it difficult to know before a search what tools or knowledge will be required to analyze the system and its data on the Premises. However, taking the storage media off-site and reviewing it in a controlled environment will allow its examination with the proper tools and knowledge.

- c. Variety of forms of electronic media. Records sought under this warrant could be stored in a variety of storage media formats that may require off-site reviewing with specialized forensic tools.

173. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit seizing, imaging, or otherwise copying storage media that reasonably appear to contain some or all of the evidence described in the warrant and would authorize a later review of the media or information consistent with the warrant. The later review may require techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of a hard drive to human inspection in order to determine whether it is evidence described by the warrant.

174. The search warrant also requests authorization to use the biometric unlock features of a device, based on the following, which I know from my training, experience, and review of publicly available materials:

- a. Users may enable a biometric unlock function on some digital devices. To use this function, a user generally displays a physical feature, such as a fingerprint, face, or eye, and the device will automatically unlock if that physical feature matches one the user has stored on the device. To unlock a device enabled with a fingerprint unlock function, a user places one or more of the user's fingers on a device's fingerprint scanner for approximately one second. To unlock a device enabled with a facial, retina, or iris recognition function, the user holds the device in front of the user's face with the user's eyes open for approximately one second.
- b. In some circumstances, a biometric unlock function will not unlock a device even if enabled, such as when a device has been restarted or inactive, has not been unlocked for a certain period of time (often 48 hours or less), or after a certain number of unsuccessful unlock attempts. Thus, the opportunity to use a biometric

unlock function even on an enabled device may exist for only a short time. I do not know the passcodes of the devices likely to be found in the search.

- c. Thus, the warrant I am applying for would permit law enforcement personnel to, with respect to any device that appears to have a biometric sensor and falls within the scope of the warrant: (1) depress [REDACTED]'s, N. CIPRIANO's, [REDACTED] or VIGNEAU's thumb- and/or fingers on the device(s); and (2) hold the device(s) in front of [REDACTED]'s, N. CIPRIANO's, [REDACTED]'s or VIGNEAU's face with their eyes open to activate the facial-, iris-, and/or retina-recognition feature.
  - d. Other than what has been described herein, to my knowledge, the United States has not attempted to obtain this data by other means.
175. Because several people may share SUBJECT PREMISES 1 and SUBJECT PREMISES 3 as a residence, it is possible that SUBJECT PREMISES 1 and SUBJECT PREMISES 3 contain storage media that are predominantly used, and perhaps owned, by persons who are not suspected of a crime. If it is nonetheless determined that that it is possible that the things described in this warrant could be found on any of those computers or storage media, the warrant applied for would permit the seizure and review of those items as well.

## **VII. REQUEST FOR SEALING**

176. Because this investigation is continuing and disclosure of some of the details of this Affidavit may cause the targets or other affiliated persons to flee or further mask their identity or activities, destroy physical and/or electronic evidence, or otherwise obstruct and seriously jeopardize this investigation, I respectfully request that this affidavit, and associated materials seeking this search warrant, be sealed until further order of this Court.

## **VIII. CONCLUSION**

177. I submit that this affidavit supports probable cause for warrants to search SUBJECT PREMISES 1-4, and SUBJECT VEHICLES 1-3, as described in Attachments A-1, A-2, A-3, A-4, A-5, A-6 and A-7, and seize the items described in Attachment B.
178. Additionally, I submit there is probable cause to believe that the funds listed in SUBJECT ACCOUNTS 1-9, as described in Attachments A-8, A-9, A-10, A-11, A-12,

A-13, A-14, A-15, and A-16, were involved in Money Laundering in violation of 18 U.S.C. § 1956(a)(1) and/or derived from proceeds traceable to violations of specified unlawful activities (as defined in 18 U.S.C. §§ 1956(c)(7), 1961(1)), specifically Interstate Transportation of Stolen Goods (18 U.S.C. § 2314). Accordingly, SUBJECT ACCOUNTS 1-9 are subject to seizure and forfeiture under 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), and 28 U.S.C. § 2461, and 18 U.S.C. § 982(a)(1).

179. Based on the events described above, SUBJECT VEHICLE 1 is known to be often located within the District of Rhode Island. Further, there is probable cause to believe that the location of SUBJECT VEHICLE 1 will assist law enforcement in conducting surveillance of [REDACTED], whose current residence is unknown, to identify other persons involved with the crimes under investigation, locate other storage locations for the suspected stolen products, and help effectuate the search of SUBJECT VEHICLE 1 contemporaneously with the searches of SUBJECT PREMISES 1-4 and SUBJECT VEHICLES 2-3 described in this affidavit.
180. In order to track the movement of SUBJECT VEHICLE 1 effectively and to decrease the chance of detection, I seek authorization to place a tracking device on SUBJECT VEHICLE 1 while it is in the District of Rhode Island. Because [REDACTED] presumably sometimes parks the SUBJECT VEHICLE 1 in driveways and on other private property, it may be necessary to enter onto private property including: a) the driveway of SUBJECT PREMISES 1; b) the parking lot/curtilage of SUBJECT PREMISES 3; and c) the driveway of 2 Grace Ave, Warwick, RI, for installation, repair, replacement, and removal of the tracking device.
181. To ensure the safety of the executing officers and to avoid premature disclosure of the investigation, it is requested that the court authorize installation, maintenance, replacement and removal of the tracking device during both daytime and nighttime hours.
182. In the event the Court grants this application, there will be periodic monitoring of the tracking device during both daytime and nighttime hours for a period of 45 days following the warrant's issuance. The tracking device may produce signals from inside private garages or other such locations not open to the public or visual surveillance.

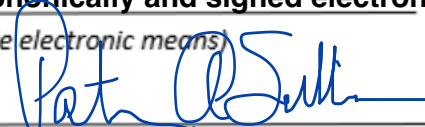
183. Based on the foregoing, I request that the Court issue the proposed warrant, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 3117, that authorizes members of the US Postal Inspection Service and their authorized representatives, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to install a tracking device on the SUBJECT VEHICLE 1 within the District of Rhode Island within 10 days of the issuance of the proposed warrant; to maintain, repair, and/or replace the tracking device as necessary; and to remove the tracking device from the SUBJECT VEHICLE 1 after the use of the tracking device has ended; to install, maintain, and remove the tracking device during both daytime and nighttime hours; and/or move the SUBJECT VEHICLE 1 to effect the installation, repair, replacement, and removal of the tracking device; and to monitor the tracking device for a period of 45 days following the issuance of the warrant, including when the tracking device is inside private garages and other locations not open to the public or visual surveillance, both within and outside the District of Rhode Island.
184. In accordance with 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3), I further request that the warrant delay notification of the execution of the tracker warrant for 30 days after the end of the authorized period of tracking (including any extensions thereof) because there is reasonable cause to believe that providing immediate notification may have an adverse result, as defined in 18 U.S.C. § 2705. Providing immediate notice would seriously jeopardize the ongoing investigation by giving suspects an opportunity to destroy or tamper with evidence, notify confederates, and change patterns of behavior.



Respectfully submitted,



United States Postal Inspection Service  
United States Postal Inspector

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by <u>                    </u> <b>Sworn telephonically and signed electronically</b> <i>(specify reliable electronic means)</i>	
September 9, 2024	
<i>Date</i>	<i>Judge's signature</i>
<b>Providence, Rhode Island</b>	<b>Patricia A. Sullivan, USMJ</b>
<i>City and State</i>	<i>Magistrate Judge Patricia A. Sullivan</i>

**Index of Paragraph References for SUBJECT PREMISES, VEHICLES, ACCOUNTS**

<i>Subject Premises/Vehicles/Accounts</i>	<i>Paragraph Number(s)</i>
SUBJECT PREMISES 1	1, 2, 36, 44-50, 54, 68, 81, 84-85, 87, 91, 102, 125, 127, 133, 141, 150, 162, 177
SUBJECT PREMISES 2	1, 22, 40, 42, 51-60, 80, 109, 115, 145, 148, 155, 162, 177
SUBJECT PREMISES 3	1, 61-68, 70, 111, 144, 162, 175, 177
SUBJECT PREMISES 4	1, 72-79, 130, 135, 157, 162, 177
SUBJECT VEHICLE 1	1, 3, 45, 49-50, 66, 68-71, 140, 179-180, 183
SUBJECT VEHICLE 2	1, 49-50, 52, 56-59, 177, 179
SUBJECT VEHICLE 3	1, 49, 56, 73, 76-78, 177, 179
SUBJECT ACCOUNT 1	4, 87, 133, 178
SUBJECT ACCOUNT 2	4, 87, 107, 141-144, 178
SUBJECT ACCOUNT 3	4, 105, 145-147, 178
SUBJECT ACCOUNT 4	4, 143, 148-149, 178
SUBJECT ACCOUNT 5	4, 150-151, 154, 178
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SUBJECT ACCOUNT 7	4, 155-156, 178
SUBJECT ACCOUNT 8	4, 130, 157-158, 178
SUBJECT ACCOUNT 9	4, 42, 115, 278

**ATTACHMENT A-1**

**PREMISES TO BE SEARCHED**



SUBJECT PREMISES 1 is the premises at [REDACTED], Pawtucket, RI 02860. SUBJECT PREMISES 1 is described as a single-family residence, tan/green in color, comprised of concrete and cinderblock. SUBJECT PREMISES 1 is located [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

The area to be searched at the SUBJECT PREMISES 1 includes all rooms, annexes, attics, basements, porches, garages, carports, outside yard area, curtilage, mailboxes, trash containers, debris boxes, storage lockers, locked containers and safes, lockers, sheds, and any visible structures and outbuildings associated with the SUBJECT PREMISES 1 and shall extend into desks, cabinets, safes, briefcases, backpacks, wallets, purses, digital devices, rental truck (e.g. U-Haul, Penske etc.) and any other storage locations within SUBJECT PREMISES 1.

The search shall also include any computers, cellular telephones, storage media/medium, and digital devices.

The search shall also include any person located at the SUBJECT PREMISES 1, as defined above, at the time the search warrant is executed, and any computers, cellular telephones, storage media/medium, briefcases, backpacks, wallets, purses on such persons.

**ATTACHMENT A-2**

**PREMISES TO BE SEARCHED**



SUBJECT PREMISES 2 is the premises at [REDACTED], Warwick, RI 02889. SUBJECT PREMISES 2 is described as a single-family residence, tan in color, comprised of vinyl siding. SUBJECT PREMISES 2 is located off of [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

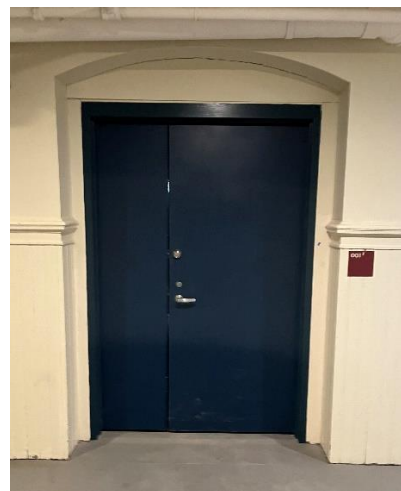
The area to be searched at the SUBJECT PREMISES 2 includes all rooms, annexes, attics, basements, porches, garages, carports, outside yard area, curtilage, mailboxes, trash containers, debris boxes, storage lockers, locked containers and safes, lockers, sheds, and any visible structures and outbuildings associated with the SUBJECT PREMISES 1 and shall extend into desks, cabinets, safes, briefcases, backpacks, wallets, purses, digital devices, rental truck (e.g. U-Haul, Penske etc.), and any other storage locations within SUBJECT PREMISES 2.

The search shall also include any computers, cellular telephones, storage media/medium, and digital devices.

The search shall also include any person located at the SUBJECT PREMISES 2, as defined above, at the time the search warrant is executed, and any computers, cellular telephones, storage media/medium, briefcases, backpacks, wallets, purses on such persons.

### ATTACHMENT A-3

#### PREMISES TO BE SEARCHED



The SUBJECT PREMISES 3 is the premises at 172 Exchange St, Room 001, Pawtucket, RI 02860. SUBJECT PREMISES 3 is described as a commercial office building, red/tan in color, comprised of stone and brick. SUBJECT PREMISES 3 is located off of Broadway. There are large wood entrance doors that faces towards Exchange St. The number “172” is clearly marked in silver letters directly on one of the wood doors. Room 001, located on the lower level, is a navy blue door, with the number “001” clearly marked in white letters to the right of the door.

The area to be searched at the SUBJECT PREMISES 3 includes all rooms, annexes, attics, basements, porches, garages, carports, outside yard area, curtilage, mailboxes, trash containers, debris boxes, storage lockers, locked containers and safes, lockers, sheds, and any visible structures and outbuildings associated with the SUBJECT PREMISES 3 and shall extend into desks, cabinets, safes, briefcases, backpacks, wallets, purses, digital devices, and any other storage locations within SUBJECT PREMISES 3.

The search shall also include any computers, cellular telephones, storage media/medium, and digital devices.

The search shall also include any person located at the SUBJECT PREMISES 3, as defined above, at the time the search warrant is executed, and any computers, cellular telephones, storage media/medium, briefcases, backpacks, wallets, purses on such persons.



**ATTACHMENT A-4**

**PREMISES TO BE SEARCHED**



SUBJECT PREMISES 4 is the premises at [REDACTED], Cranston, RI 02910. SUBJECT PREMISES 4 is described as a single-family residence, tan in color, comprised of vinyl siding. SUBJECT PREMISES 4 is located [REDACTED]

The area to be searched at the SUBJECT PREMISES 4 includes all rooms, annexes, attics, basements, porches, garages, carports, outside yard area, curtilage, mailboxes, trash containers, debris boxes, storage lockers, locked containers and safes, lockers, sheds, and any visible structures and outbuildings associated with the SUBJECT PREMISES 4 and shall extend into desks, cabinets, safes, briefcases, backpacks, wallets, purses, digital devices, rental truck (e.g. U-Haul, Penske etc.), and any other storage locations within SUBJECT PREMISES 4.

The search shall also include any computers, cellular telephones, storage media/medium, and digital devices.

The search shall also include any person located at the SUBJECT PREMISES 4, as defined above, at the time the search warrant is executed, and any computers, cellular telephones, storage media/medium, briefcases, backpacks, wallets, purses on such persons.



**ATTACHMENT A-5**

**VEHICLE TO BE SEARCHED ("SUBJECT VEHICLE 1")**

A 2018 Nissan Sentra (VIN# 3N1AB7AP4JY297027), color silver, registered in the name of [REDACTED], Pawtucket, RI, Rhode Island registration ZA496, and believed to be located at [REDACTED] Pawtucket, RI, as depicted below.



The area to be searched in the SUBJECT VEHICLE 1 includes all trash containers, debris boxes, storage lockers, locked containers and safes, lockers, within the SUBJECT VEHICLE 1 and shall extend into safes, briefcases, backpacks, wallets, purses, digital devices, and any other storage locations within the SUBJECT VEHICLE 1.

The search shall also include any computers, cellular telephones, storage media/medium, and digital devices.

The search shall also include any person located in the SUBJECT VEHICLE 1, as defined above, at the time the search warrant is executed, and any computers, cellular telephones, storage media/medium, briefcases, backpacks, wallets, purses on such persons.

**ATTACHMENT A-6**

**VEHICLE TO BE SEARCHED ("SUBJECT VEHICLE 2")**

A 2020 Nissan Rogue (VIN# JN8AT2MV6LW134501), color silver, registered in the name of Norman Cipriano, [REDACTED], Warwick, RI, Rhode Island registration RF197, and believed to be located at [REDACTED], Warwick, RI, as depicted below.



The area to be searched in the SUBJECT VEHICLE 2 includes all trash containers, debris boxes, storage lockers, locked containers and safes, lockers, within the SUBJECT VEHICLE 2 and shall extend into safes, briefcases, backpacks, wallets, purses, digital devices, and any other storage locations within the SUBJECT VEHICLE 2.

The search shall also include any computers, cellular telephones, storage media/medium, and digital devices.

The search shall also include any person located in the SUBJECT VEHICLE 2, as defined above, at the time the search warrant is executed, and any computers, cellular telephones, storage media/medium, briefcases, backpacks, wallets, purses on such persons.

**ATTACHMENT A-7**

**VEHICLE TO BE SEARCHED ("SUBJECT VEHICLE 3")**

A 2016 Dodge Challenger (VIN# 2C3CDZAG8GH225715), color white, registered in the name of Patrick Vigneau, [REDACTED], Cranston, RI, Rhode Island registration 1EK361, and believed to be located at [REDACTED], Cranston, RI, as depicted below.



The area to be searched in the SUBJECT VEHICLE 3 includes all trash containers, debris boxes, storage lockers, locked containers and safes, lockers, within the SUBJECT VEHICLE 3 and shall extend into safes, briefcases, backpacks, wallets, purses, digital devices, and any other storage locations within the SUBJECT VEHICLE 3.

The search shall also include any computers, cellular telephones, storage media/medium, and digital devices.

The search shall also include any person located in the SUBJECT VEHICLE 3, as defined above, at the time the search warrant is executed, and any computers, cellular telephones, storage media/medium, briefcases, backpacks, wallets, purses on such persons.

**ATTACHMENT A-8**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 1”)**

<b>BANK:</b>	N/A
<b>ACCOUNT NAME:</b>	JDC Wholesale LLC
<b>ACCOUNT NUMBER:</b>	Amazon E-Commerce Site

**ATTACHMENT A-9**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 2”)**

**BANK:** Bank of America  
**ACCOUNT NAME:** JDC Wholesale, LLC  
**ACCOUNT NUMBER:** [REDACTED] 3476

**ATTACHMENT A-10**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 3”)**

**BANK:** Bank of America  
**ACCOUNT NAME:** Norman Leo Cipriano / [REDACTED]  
**ACCOUNT NUMBER:** [REDACTED] 4205



**ATTACHMENT A-11**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 4”)**

<b>BANK:</b>	Bank of America
<b>ACCOUNT NAME:</b>	East Coast Deals One LLC
<b>ACCOUNT NUMBER:</b>	██████████ 5605

**ATTACHMENT A-12**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 5”)**

**BANK:** TD Bank  
**ACCOUNT NAME:** [REDACTED]  
**ACCOUNT NUMBER:** [REDACTED] 8672

**ATTACHMENT A-13**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 6”)**

**BANK:** TD Bank  
**ACCOUNT NAME:** [REDACTED]  
**ACCOUNT NUMBER:** [REDACTED] 7525

**ATTACHMENT A-14**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 7”)**

**BANK:** TD Bank  
**ACCOUNT NAME:** Atlantic Coast Discounts LLC  
**ACCOUNT NUMBER:** [REDACTED] 7837

**ATTACHMENT A-15**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 8”)**

**BANK:** TD Bank  
**ACCOUNT NAME:** Patrick Vigneau  
**ACCOUNT NUMBER:** [REDACTED] 1714

**ATTACHMENT A-16**

**ACCOUNT TO BE SEIZED (“SUBJECT ACCOUNT 9”)**

<b>BANK:</b>	N/A
<b>ACCOUNT NAME:</b>	Angie’s Discount Store
<b>ACCOUNT NUMBER:</b>	eBay E-Commerce Site



**ATTACHMENT B****A. ITEMS TO BE SEIZED**

The following materials, which constitute evidence of the commission of a criminal offense, contraband, the fruits of crime, or property designed or intended for use or which is or has been used as a means of committing a criminal offense, namely violations of the Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 2314, Conspiracy to Commit Interstate Transportation of Stolen Goods in violation of 18 U.S.C. § 371, Money Laundering in violation of 18 U.S.C. § 1956(a)(1), Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h), and Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of 18 U.S.C. § 1957 (“Specified Federal Offenses”):

1. Records and other materials, including notes, ledgers, envelopes, and packaging materials, relating to solicitation and/or receipt of cash, money orders, checks, or wire transfers that were sent to [REDACTED], Norman CIPRIANO, [REDACTED] [REDACTED] Patrick VIGNEAU and/or to entities in the name of or associated with [REDACTED], N. CIPRIANO, [REDACTED] and VIGNEAU, including but not limited to JDC Wholesale LLC, East Coast Deals, East Coast Deals One LLC, Atlantic Coast Discounts LLC, and Angie’s Discount Store;
2. Records relating to any communications by, between, and among [REDACTED], Norman CIPRIANO, [REDACTED] and Patrick VIGNEAU including known and unknown conspirators, relating to the receipt, solicitation, and transfer of stolen goods;
3. Records relating to the use and/or creation of false business, corporations and/or LLC’s;
4. Stolen property including but not limited to health products (such as allergy medication/sprays, vitamins, pills, nutrition supplements, sunscreen, OTC medications) and beauty products (such as wrinkle corrector, hair products);
5. Sale and customer information for items sold on online marketplaces such as Amazon, eBay, and Walmart;
6. Photographs of the stolen property and photographs used to advertise the sale of stolen property on online marketplaces;
7. Records showing the source of the stolen goods including inventory lists;
8. Removed product stickers including store stickers and stickers that indicate that specific product, if purchased elsewhere, may, in fact, be stolen;
9. Cash representing the proceeds of purchases and/or sales of stolen goods.

10. Text messages and email communications, including communications to and from eastcoastdeals@yahoo.com, [REDACTED]@gmail.com, patrickvigneau777@aol.com, [REDACTED]@gmail.com and ciprianonorman57@gmail.com relating to the opening and closing of bank accounts and the solicitation, receipt and transfer of funds;
11. Any and all opened or sealed USPS Priority or other mail envelopes and packages and mailing slips, to include but not limited to such envelopes and packages from individuals identified as co-conspirators in this investigation and more generally, in relation to stolen goods and/or the transfer and receipt of funds between the subjects of the investigation and other persons;
12. Documents and articles of personal property reflecting the identity of persons occupying, possessing, residing in, owning, frequenting, or controlling the SUBJECT PREMISES 1-4 and SUBJECT VEHICLES 1-3, including keys, rental agreements and records, utility bills and receipts, photographs, answering machine tape recordings, telephone, vehicle records, canceled mail envelopes, correspondence, financial documents such as tax returns, bank records, safety deposit box records, canceled checks, and other records of income and expenditure, credit card records, travel documents, personal identification documents, including birth certificates, driver's license, immigration cards, and other forms of identification;
13. Records relating to the use, possession, and control of cellular telephones seized from the SUBJECT PREMISES 1-4 and SUBJECT VEHICLES 1-3, or any person located therein, and any landline telephones or internet service associated with the SUBJECT PREMISES 1-4;
14. Records relating to any communications with co-conspirators, including telephone, electronic, or in person communications in relation to the Specified Federal Offense and/or the transfer and receipt of funds between [REDACTED], Norman CIPRIANO, [REDACTED] and Patrick VIGNEAU and other persons;
15. Records, documents, and deeds reflecting the purchase or lease of real estate, vehicles, precious metals, jewelry, crypto currency or other items obtained with the proceeds from a fraud;
16. All notes, documents, records, correspondence, diaries, and address books, in any format or medium (including, but not limited to, computer or digital data files, envelopes, letters, papers, handwritten notes, and electronic messages, chat logs and electronic records) relating to individuals identified as co-conspirators in this investigation and more generally, in relation to any stolen goods scheme and/or the transfer and receipt of funds between the subjects of the investigation and other persons;
17. Banking, money remitter, and financial institution records, including but not limited to bank statements, credit card statements, canceled checks, money orders, deposit

slips, orders for receipt or sending of money transfer by wire, checking and savings books, financial institution statements, and records of safe deposit boxes;

18. For any computer or storage medium whose seizure is otherwise authorized by this warrant, and any computer or storage medium that contains or in which is stored records or information whose seizure is authorized by this warrant, including any cell phones (hereinafter, "COMPUTER"):
  - a. evidence of who used, owned, or controlled the COMPUTER at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, "chat," instant messaging logs, photographs, and correspondence;
  - b. evidence of software that would allow others to control the COMPUTER, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;
  - c. evidence of the lack of such malicious software;
  - d. evidence indicating how and when the computer was accessed or used to determine the chronological context of computer access, use, and events relating to the crimes under investigation and to the computer user;
  - e. evidence indicating the computer user's knowledge and/or intent as it relates to the crimes under investigation;
  - f. evidence of the attachment to the COMPUTER of other storage devices or similar containers for electronic evidence;
  - g. evidence of programs (and associated data) that are designed to eliminate data from the COMPUTER;
  - h. evidence of the times the COMPUTER was used;
  - i. passwords, encryption keys, and other access devices that may be necessary to access the COMPUTER;
  - j. documentation and manuals that may be necessary to access the COMPUTER or to conduct a forensic examination of the COMPUTER;
  - k. records of or information about Internet Protocol addresses used by the COMPUTER; and
  - l. records of or information about the COMPUTER's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

The term "computer" includes all types of electronic, magnetic, optical, electrochemical, or other high-speed data processing devices performing logical, arithmetic, or storage functions, including desktop computers, notebook computers, mobile/cellular phones, tablets, server computers, and network hardware. The term "storage medium" includes any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMS, and other magnetic or optical media.

19. Routers, modems, and network equipment used to connect computers to the Internet.
20. As used in this Attachment, the terms “records” and “information” includes all forms of creation or storage, including any form of computer or electronic storage (such as hard disks or other media that can store data); any handmade form (such as writing); any mechanical form (such as printing or typing); and photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or photocopies).
21. With respect to any and all electronically stored information in cellular telephones, in addition to the information described herein, agents may also access, record and seize the following:
  - a. Telephone numbers of incoming/outgoing calls stored in the call registry;
  - b. Digital, cellular and/or telephone numbers and/or direct connect numbers, names and identities stored in the directories;
  - c. Any incoming/outgoing text messages relating to the above criminal violations;
  - d. Telephone subscriber information;
  - e. The telephone numbers stored in the cellular telephone and/or PDA;
  - f. records relating to the use, possession, and control of any cellular telephones seized;
  - g. Any other electronic information stored in the memory and/or accessed by the active electronic features of the digital or cellular telephone including but not limited to photographs, videos, e-mail, and voice mail relating to the above criminal violations.
22. Contextual information necessary to understand the evidence described in this attachment.

**B. AUTHORIZED SEARCH PROCEDURE**

1. Law enforcement personnel or other individuals assisting law enforcement personnel (the “search team”) will, in their discretion, either search the digital device(s) on-site or seize and transport the device(s) and/or forensic image(s) thereof to an appropriate law enforcement laboratory or similar facility to be searched at that location.
2. In order to search for the items described above that may be maintained in electronic media, the search team are authorized to search, copy, image and seize the following items for off-site review:
  - a. Any computer or storage medium capable of being used to commit further or store evidence of the Specified Federal Offenses; and
  - b. Any physical keys, encryption devices, dongles and similar physical items that are necessary to gain access to the computer or storage medium;

3. Pursuant to Rule 41(f)(1)(B), the government will retain a copy of the electronically stored information that was seized or copied for the purpose of the evidentiary authentication and any potential discovery obligations in any related prosecution.

C. SEARCH PROCEDURE FOR DEVICES CAPABLE OF BIOMETRIC ACCESS

1. During the execution of this search warrant, law enforcement is permitted to: (1) depress [REDACTED]'s, N. CIPRIANO's, [REDACTED]'s or VIGNEAU's thumb- and/or fingers on the device(s); and (2) hold the device(s) in front of [REDACTED]'s, N. CIPRIANO's, [REDACTED]'s or VIGNEAU's face with their eyes open to activate the facial-, iris-, and/or retina-recognition feature.

In depressing a person's thumb or finger onto a device and in holding a device in front of a person's face, law enforcement may not use excessive force, as defined in Graham v. Connor, 490 U.S. 386 (1989); specifically, law enforcement may use no more than objectively reasonable force in light of the facts and circumstances confronting them.

The special procedures relating to digital devices found in this warrant govern only the search of digital devices pursuant to the authority conferred by this warrant and do not apply to any search of digital devices pursuant to any other court order.