

1:25-mj-17-PAS

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

I, Lise B. George, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this Affidavit in support of an arrest warrant and criminal complaint for ALBERTO RIVERA (“RIVERA”), year of birth 1999, LUIS ACEITUNO (“ACEITUNO”), year of birth 1997, and KURON MITCHELL (“MITCHELL”), year of birth 1999.

2. I am an “investigative or law enforcement officer” of the United States, within the meaning of Section 2510 (7) of Title 18, United States Code, and I am empowered by law to conduct investigations and make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

3. I have been a Federal Bureau of Investigation (“FBI”) Special Agent since 2009. I am currently assigned to violent crime matters within the Providence Resident Agency. I investigate bank robbery, exploitation of children, as well as the trafficking of individuals within and from outside the United States. I have received extensive training in federal criminal and constitutional law and evidence collection. I am a graduate of Georgetown University where I received my master’s degree from the School of Foreign Service for Latin American Studies. From 2009 to 2011, I was assigned to a white-collar crime squad where I investigated financial institution fraud, mortgage fraud, and securities fraud, among other criminal violations. From 2011 to 2017, I was assigned to the Organized Crime Drug Enforcement Strike Force. From 2017 to 2021, I was assigned to the Boston Field Office where I investigated human trafficking and child exploitation matters. Prior to my appointment as a Special Agent, I was employed for three years as an Intelligence Analyst with the FBI, during which time I conducted analysis, researched, and wrote reports in support of FBI white collar and cybercrime investigations. I have participated in

investigations of human trafficking, bank fraud, narcotics trafficking and money laundering, and among other things, have conducted and participated in physical surveillance, debriefings of informants, and the execution of search warrants. I have also been an Affiant of Title III wire intercepts.

4. The facts in this Affidavit come from my involvement in a collaborative investigation being handled primarily by the FBI, Cranston Police Department (“CPD”), Providence Police Department (“PPD”), and the Internal Revenue Service (“IRS”), among others. This Affidavit is intended to show there are specific and articulable facts for the requested arrest warrants and criminal complaint and does not set forth all of my knowledge about this matter.

STATUTES

5. Title 18 United States Code Section 2314 makes it a crime for anyone to transport, transmit, or transfer in interstate or foreign commerce any goods, wares, merchandise, securities, or money of the value of \$5,000 or more, knowing the same to have been stolen, converted, or taken by fraud.

6. Title 18 United States Code Section 371 makes it a crime to conspire to commit any offense against the United States, or to defraud the United States, or any agency thereof, in any manner or for any purpose.

7. Title 26 United States Code Section 7206(1) makes it a crime to willfully subscribe to a false or fraudulent tax return, statement, or other document.

Background: Catalytic Converter Thefts

8. Catalytic converters filter and burn harmful pollutants and toxic gasses produced by a vehicle’s exhaust system by converting engine-exhaust pollutants into carbon dioxide and water vapor by a catalyzing chemical reaction. The catalyst for the reaction typically is a precious

metal, such as platinum, palladium, or rhodium, that can be extracted from the converter. In 2020-2021,¹ the market values for these precious metals surged, making their resale particularly profitable. Depending on the model and type of precious metal component, the average scrap price for catalytic converters ranged from \$300 to \$1,500 during this time frame.

9. Catalytic converters became a desirable target for thieves because of their value, the ease in which they can be cut or removed from a vehicle, and the difficulty in tracing a stolen converter to its originating vehicle. From 2021 until 2023, the incentive for scrap metal businesses to salvage and pay cash for the catalytic converters was compelling. As described in greater detail below, thieves began to target vehicles for not only their rims and tires, but also for their catalytic converters, especially hybrid vehicles as those converters drew a better resale price.

Company 1²

10. In January 2022, the Cranston Police Department (“CPD”) began tracking the patterns of events surrounding the thefts of catalytic converters and identified a criminal group believed to be responsible for more than 7,000 stolen catalytic converters³ in southern New England. Many of the cutters⁴ went to Company 1, located in Providence, Rhode Island to sell the stolen converters.

11. Your Affiant interviewed cooperating witnesses who sold stolen catalytic converters during 2021 until approximately 2023. These witnesses explained that there were other

¹ <https://www.usatoday.com/story/money/cars/2023/08/16/catalytic-converter-theft-down/70579555007/> and <https://autorecyclingworld.com/understanding-the-rise-and-fall-of-catalytic-converter-prices/>, both accessed on 12/30/2024.

² The identity of Company 1 is known to your Affiant. It is provided in redacted format to comply with Fed. R. Crim. 49.1.

³ This number represents more than \$2.4 million dollars-worth of catalytic converters.

⁴ A cutter is a common name to reference the individual who physically removed a catalytic converter from a vehicle.

recyclers, or businesses, that paid for catalytic converters, in and around Rhode Island that paid for catalytic converters in cash, but they required certain documentation regarding the vehicle from which the converter came (vehicle identification number, bill of sale, vehicle registration, and the like) and from the customer (photo identification and to register with the recycler). These witnesses advised that they chose Company 1 because they received cash payments with little scrutiny.

12. These cooperating witnesses also stated that Company 1 employees purchased catalytic converters that they knew were clearly stolen (by the way in which the catalytic converters were cut and presented for sale), did not require photo identification, and did not require documentation of the origin of the converters. Two witnesses stated that Company 1 “paid more than anyone else.” One witness stated that he would always walk out of Company 1 with “cash in hand,” no questions asked.

13. The FBI became involved in the investigation and in February 2023, agents executed a federal search warrant at Company 1. Among the items seized pursuant to the search warrant was Company 1’s database, which recorded the transactions and the surveillance footage (available only in stills) of the transactions. Specifically, the person who appeared at Company 1 to sell catalytic converters and oftentimes their vehicles were recorded as part of a “ticket” or transaction for the sale.

PROBABLE CAUSE

Background

14. From at least January 2021 until November 2022, RIVERA, ACEITUNO, MITCHELL and their associates canvassed neighborhoods and parking lots in search of unoccupied vehicles from which they could steal the catalytic converters. As described in more

detail below, RIVERA, ACEITUNO, and MITCHELL conspired to steal the catalytic converters and transport those from outside Rhode Island across state lines for sale at Company 1.

15. I know RIVERA, ACEITUNO, and MITCHELL to be associates and friends as I have reviewed their social media interactions (direct message exchanges, posts that “tag” each other, and photos of each other) and reviewed police reports where, as an example, MITCHELL and RIVERA were arrested together during the theft of catalytic converters in Braintree, Massachusetts (discussed in greater detail below).

16. RIVERA is known by his associates as “Moty,” MITCHELL is known to his associates as “Smoke” and ACEITUNO is known to his associates as “Lulu.” They are referred as such in jail calls, Instagram communications, and I have heard these nicknames during investigative interviews.

17. Working in groups, RIVERA, ACEIUTUNO, and MITCHELL and their associates targeted vehicles in Massachusetts and Rhode Island and brought the catalytic converters to Providence, Rhode Island to sell at Company 1. A review of Company 1’s and the Rhode Island Attorney General Bureau of Criminal Identification’s databases⁵ reported that in 2022: RIVERA sold 19 catalytic converters and received \$7,100; and ACEITUNO sold 1,230 catalytic converters and received \$466,070.

Surveillance Observations at RIVERA’s residence on Park Avenue, Cranston, RI

18. In August and September 2022, surveillance captured RIVERA and ACEITUNO at RIVERA’s residence moving burglarious tools, catalytic converters, and removing and attaching

⁵ The Rhode Island Attorney General’s Bureau of Criminal Identification (“RIAG BCI”), Precious Metals Licensing division regulates licenses for those that deal in precious metals. Entities or individuals licensed to purchase precious metals are required to record all transactions in a database maintained by RIAG BCI.

license plates onto and from various vehicles. For example, on August 31, 2022, at 5:29PM, RIVERA is observed driving a white Jeep Grand Cherokee with ACEITUNO as his passenger. As depicted in the photos below, ACEITUNO is observed retrieving a large mechanic style floor jack from the rear seat area of the Jeep and then a large tool bag from the trunk and putting it into the detached garage. RIVERA and ACEITUNO depart the residence soon thereafter. On September 2, 2022, at 8:11AM, RIVERA is observed retrieving what appears to be a large catalytic converter from the garage and putting it into the same white Jeep. At 9:04AM the same day, J.J., conducted a transaction at Company 1 for 19 catalytic converters.



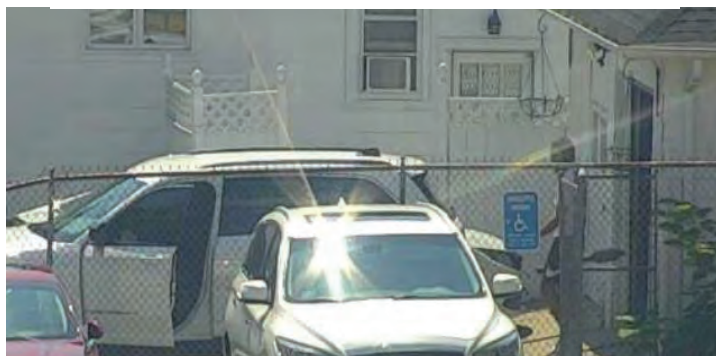
RIVERA is switching out the license plates on the vehicle.



ACEITUNO (R) and RIVERA (L) are unloading catalytic converters from the white SUV.



ACEITUNO removes a floor jack from the vehicle and places it in the detached garage.



RIVERA, to the right of the vehicle, is carrying a catalytic converter.



RIVERA is seen removing a catalytic converter from the SUV.

19. In January 2025, your Affiant interviewed J.J., who stated that RIVERA approached him in the summer of 2022 requesting help selling catalytic converters because J.J. had a valid driver's license. RIVERA gave J.J. \$50 for each transaction.⁶ J.J. conducted no more than ten transactions at Company 1 for RIVERA. RIVERA went with J.J. to Company 1 each time. After each transaction, J.J. immediately gave the ticket or receipt from the transaction and the cash to RIVERA. J.J. recalled MITCHELL (who J.J. knew as "Smoke") accompanying RIVERA on at least one trip to Company 1. J.J. recalled RIVERA operating different vehicles to drive to Company 1. J.J. also recalled ACEITUNO living on Pinehurst Street in Providence, RI.

Catalytic Converter Thefts

Zip Car Rental Information

20. A review of payment and rental information from Zip Car⁷ shows that from June 2022 until September 2022, A.R., the mother of MITCHELL's children, conducted 28 separate rental reservations at Zip Car. A.R. subsequently met with law enforcement. She explained that some of these 28 rentals were for her own use, but A.R. also shared her account credentials with MITCHELL so he could rent cars using her account without her assistance.

21. A.R. identified rentals that MITCHELL rented without her involvement. Of the vehicles that A.R. stated that she did not rent for her own use was a grey Volkswagen Golf, rented from Oak Street, Providence, Rhode Island from June 19, 2022, until June 24, 2022.

22. The review of the Volkswagen Golf rental's GPS data show MITCHELL's pattern of life. For instance, on June 21, 2022, at 9:37PM the vehicle stopped at the Family Dollar in

⁶ J.J., whose identity is known to law enforcement, sold 305 catalytic converters and received \$71,315.

⁷ Zip Car, a car rental business, collects and retains global positioning system (GPS) data for their fleet of vehicles.

Providence. A cash deposit in MITCHELL's CashApp account in the amount of \$237 was also recorded a minute later at 9:38PM. A.R. confirmed that this payment was via CashApp for the Zip Car.

23. On June 22, 2022, MITCHELL posted a story on his Instagram account "frikiton_daceo"⁸ that, in notable part showed the vehicle he was in. The following picture is a still from the Instagram story (on the right) alongside a stock image (on the left) of a 2021 Volkswagen Golf TSI.



24. As explained in Paragraphs 26 through 31, during the rental period, the vehicle's route began at MITCHELL's residence, made stops at ACEITUNO's residence, and participated in thefts before traveling to Company 1 on 20 separate occasions. A review of the tickets in ACEITUNO's name for the same period (June 19, 2022, until June 24, 2022) showed ACEITUNO received \$17,975 from Company 1 for the sale of catalytic converters.

⁸ Your Affiant has reviewed this account, which was available to the public and showed multiple pictures of MITCHELL. The owner of the account was listed as "Babyface smoke" and is linked to gstreetexotics_tintingervice, which posted MITCHELL's phone number.

Catalytic Converter Thefts: Rhode Island⁹

25. Rhode Island law enforcement received a series of reports of stolen catalytic converters. The thefts of these converters took place on June 22, 2022, but of these thefts, many victims did not discover the thefts until a day or two later. The following is a series of thefts that took place on June 22, 2022:

- a. On June 23, 2022, PPD received a report of a stolen catalytic converter from an individual who parked their vehicle at Holden Street.
- b. On June 24, 2022, the Warwick Police Department received a complaint of a stolen catalytic converter from Centreville Road.
- c. On June 22, 2022, the Warwick Police Department responded to Bald Hill Road for a report of stolen catalytic converter.
- d. On June 23, 2022, CPD was dispatched to a business on Kenney Drive for a report of a stolen catalytic converter. The complainant stated that the previous day she discovered that the catalytic converter had been cut off her vehicle and that on the day of the complaint she was able to retrieve video surveillance of the theft. According to the report, the video depicted a grey Volkswagen hatchback had pulled alongside her vehicle at 12:05PM, but due to the angle of the camera, no license plate information or a description of the suspects were captured.
- e. On June 23, 2022, PPD received a report of a theft of a catalytic converter that occurred on June 22, 2022, from a vehicle parked on Cadillac Drive. Also on June 23, 2022, PPD also responded to two calls for service: one at Melrose Street (near

⁹ Information about criminal activity committed in Rhode Island is being included to provide context, show intent, and demonstrate motive.

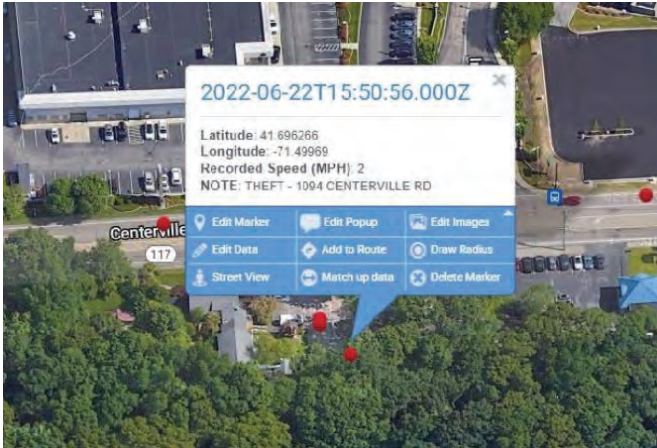
Lexington Avenue) and one at Benefit Street, both for a thefts of catalytic converters that occurred the previous day.

- f. Later in the day on June 22, 2022, PPD respond to a call for service at an elementary school on Wickenden Street for a theft of a catalytic converter.

26. A review of the GPS data of the Volkswagen Golf for June 22, 2022, shows a route that followed the thefts in the order that they are described above. Beginning at 9:13AM when the car is turned on at Douglas Avenue, Providence, the vehicle then made two stops and then traveled to ACEITUNO's residence. After two more stops, the vehicle traveled to Holden Street, where it stopped at 10:09AM (as depicted in the map below). The vehicle is at the same location during the same timeframe as the theft reported to PPD, as described in paragraph 25a above.

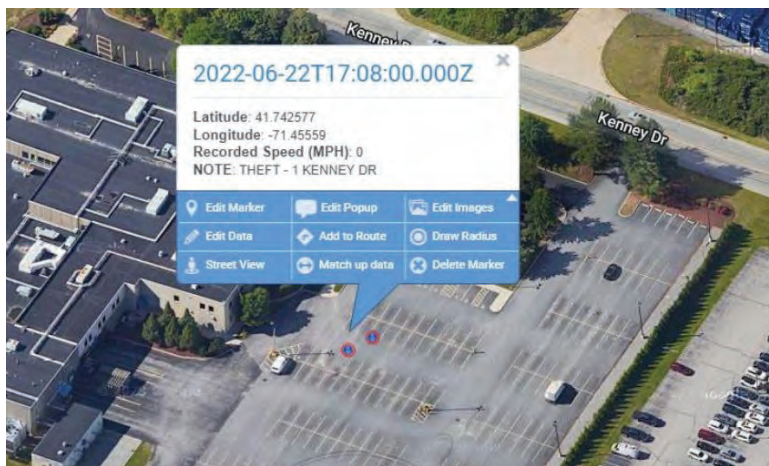


27. At 11:50AM, the vehicle made a stop at Centreville Road, Warwick as depicted below. The vehicle is at the same location during the same timeframe as the theft reported to Warwick Police, as described in paragraph 25b above:



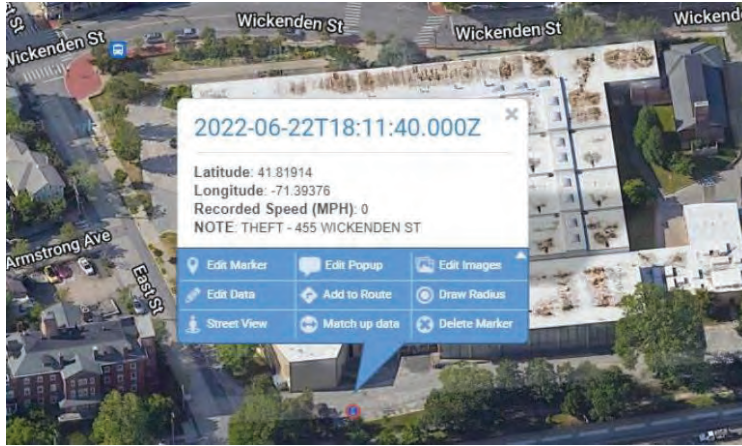
28. On the same day, at 12:45PM, the vehicle stopped at a parking lot at Bald Hill Road, where the Warwick Police responded to the call for service regarding a stolen catalytic converter. The vehicle is at the same location as the theft reported to Warwick Police, as described in paragraph 25c.

29. At 1:08PM, the vehicle stopped at a jewelry store on Kenney Drive as depicted in the picture below. The vehicle is at the same location as the theft reported to CPD, as described in paragraph 25d.



30. Six minutes later, the vehicle stopped in the driveway of Melrose Street on the Lexington side. The vehicle is at the same location as the theft reported to PPD, as described in paragraph 25e. The vehicle then traveled to the east side of Providence where at 2:06PM, the

vehicle stopped at Benefit Street. The vehicle is at the same location as the theft reported to PPD, described in paragraph 25e. Five minutes later, the vehicle stopped in the rear parking lot (as shown below) of an elementary school on Wickenden Street where PPD later responded. The vehicle is at the same location during the same timeframe as the theft reported to PPD, as described in paragraph 25f.



31. At 2:46PM, the vehicle stopped at a local business in Providence for seven minutes, and at 2:57PM, the vehicle stopped at Company 1. The vehicle stayed at Company 1 for approximately 10 minutes, during which time a sale is recorded (at 3:05PM) for 12 catalytic converters. As shown below in the surveillance photo from Company 1, ACEITUNO conducted the transaction, his name is on the ticket, and he received \$4,675 for the sale. A grey Volkswagen Golf, which ACEITUNO gets out of, is observed in the background of the surveillance picture below.



Catalytic Converter Thefts: Boston and Canton, Massachusetts

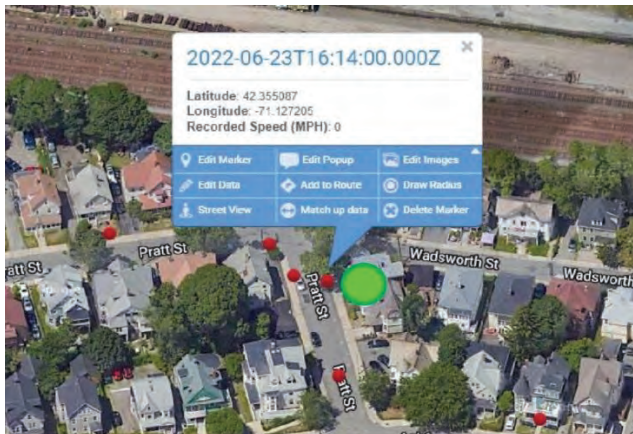
32. On June 23, 2022, at 11:22PM, the Boston Police Department responded to Pratt Street, Boston, Massachusetts for a theft of a catalytic converter; the victim stated that the theft occurred sometime after 11:00AM that day.

33. The Canton Police Department reported that at 2:00PM on June 23, 2022, a grey Volkswagen Golf with heavily tinted windows, bearing Washington registration 12956C (which was attached and not the registration belonging to the rental) pulled alongside a Mercury Mountaineer. While an occupant of the suspect vehicle was cutting the catalytic converter, employees of a nearby business approached the vehicle, at which time a second suspect exited the rear driver's side and signaled to the other suspect to flee. The Canton Police Department's bulletin showed the following picture as their suspect vehicle:



34. Of the vehicles that A.R. stated that she did not rent for her own use was a Volkswagen Golf, rented from Oak Street, Providence from June 19, 2022, until June 24, 2022. A review of this vehicle's GPS data (start and stop points) revealed that on June 23, 2022, the vehicle's starting location is at MITCHELL's residence when it is turned on at 8:09AM. The vehicle traveled to J.M.,¹⁰ an associate's address, and then to ACEITUNO's residence.

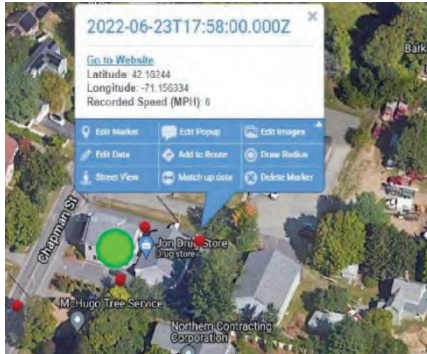
35. The vehicle made stops at a gas station, returned to MITCHELL's residence, and then the vehicle traveled north into Massachusetts. As shown in the map of the GPS location of Volkswagen Golf below, from 12:11PM until 12:14PM, the vehicle stopped at Pratt Street, Boston, Massachusetts. This location is the same as the reported catalytic converter theft described above in paragraph 32.



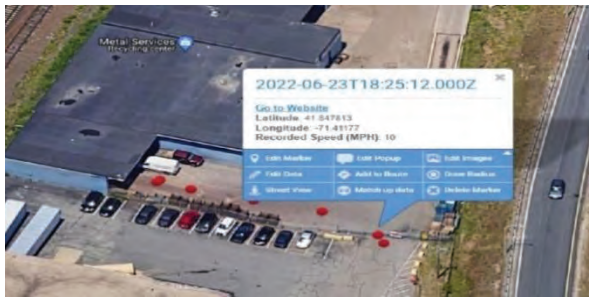
36. The map of the vehicle's route shows that it traveled throughout Boston before heading southbound. As shown below, at 1:58PM, the vehicle is on the property of Chapman Street, Canton, MA. The vehicle made this stop at the same time and at the same location where the Canton Police Department took a report of a theft of a catalytic converter, as described

¹⁰ The identity of J.M. is known to your Affiant. It is provided in redacted format to comply with Fed. R. Crim. 49.1. J.M. is a known associate of RIVERA, MITCHELL, and ACEITUNO. J.J., who identified J.M. as such, recalled RIVERA meeting J.M. down the street from Company 1. J.M. left catalytic converters in RIVERA's car and collected them prior to RIVERA and J.J. traveling to Company 1 to sell catalytic converters.

in Paragraph 33.



37. The vehicle's next stop was Company 1, where it stayed for approximately six minutes. As shown below in surveillance footage from Company 1, ACEITUNO sold eight catalytic converters and received \$1,785. A grey Volkswagen Golf is observed in the background of the picture.



Catalytic Converter Thefts: Watertown, Massachusetts

38. On August 5, 2022, Watertown Police Department took reports of stolen catalytic converters from two individuals who had parked their vehicles at businesses on Arsenal Street. On

the same day, Watertown Police Department was called to a business on Arsenal Street whose trucks were vandalized when suspects attempted to steal the catalytic converters from the company's trucks. An employee of this business reported seeing a silver SUV with "717" in the Florida license plate. According to a Watertown Police Department report, the suspect vehicle is described as a grey Honda CRV with tinted windows bearing Florida registration (rear plate only). On August 6, 2022, a Silver Honda CRV with Florida registration Z177MU was captured on FLOCK cameras on Park Avenue in Cranston, RI.

39. FBI CAST analysis¹¹ shows that on August 5, 2022, at 5:59PM, RIVERA's phone used a cellular tower that is less than .2 mile away from the location of the first Watertown theft. A review of surveillance footage shows suspects exiting the suspect vehicle, getting the floor jack out of the vehicle, and getting underneath the victim's vehicle at 6:07PM. The video shows at least three people jacking up the victim vehicle, and at one point the driver assists the process of getting the vehicle up, while one suspect is cutting the converter from the vehicle. The suspect vehicle departed at 6:10PM.

40. The following business day, Monday, August 9, 2022, ACEITUNO recorded two sales at Company 1; he received a total of \$13,685 for 27 converters. The surveillance from inside Company 1 shows ACEITUNO unloading the catalytic converters from a smaller SUV.

¹¹ On November 9, 2022, the Honorable Lincoln D. Almond signed a search warrant for cell site data for RIVERA's telephone number ending in 6408. The FBI's Cellular Analysis Survey Team ("CAST") analyzed these records and provided their results to your Affiant, which will be described in further detail below.



Catalytic Converter Thefts: Fall River, Massachusetts

41. On September 6, 2022, CPD officers conducted physical surveillance at RIVERA's residence. During surveillance, CPD observed a blue Nissan Maxima¹² backed into RIVERA's residence, with its trunk facing the garage. At 5:41PM, officers observed RIVERA remove a license plate from the Maxima. During the surveillance, J.M. is observed placing a large floor jack and a tool bag into the vehicle. Law enforcement observed RIVERA to be wearing white and dark colored Nike shoes with a dark "Swoosh" on the side. At 5:30PM, RIVERA used a cellular tower that placed him at his residence, making two outgoing voice calls. When RIVERA and his associates departed the residence, Massachusetts registration plate 7KC469¹³ (cancelled registration) is observed attached to the vehicle.

42. At 9:01PM, FLOCK¹⁴ cameras located in Fall River, Massachusetts captured the

¹² A review of receipts from Hertz Global Holdings, Inc., a rental car agency, revealed that RIVERA reserved a blue Nissan Maxima from September 4, 2022, to September 24, 2022, from a Hertz location in Providence, RI.

¹⁴ FLOCK cameras are located throughout New England for private use, commercial business security, and law enforcement use to capture vehicle license plate information.

Massachusetts registration plate 7KC469 in the vicinity of Highland Avenue and Wilson Road. At 4:42AM on September 7, 2022, FLOCK cameras once again capture this license plate in Fall River. At 5:13 AM, the Maxima returned to RIVERA's residence.

43. Fall River Police Department ("FPD") received reports of approximately 20 catalytic converter thefts in their city from approximately 2:00AM to 5:00AM on the morning of September 7, 2022. A FPD report stated in notable part that a blue Nissan Maxima (working alongside a white Prius with an attached ([cancelled] Michigan) license plate DRV1615 was the suspect vehicle in the thefts. Video surveillance captured at least four masked subjects involved in the thefts around Fall River. Video surveillance also captured a male involved in the theft of a catalytic converter wearing similar clothes to those officers observed RIVERA wearing in the driveway of his residence at 5:40PM, to include the white and dark-colored Nikes. The male is observed in the surveillance footage carrying what appears to be a saw or a type of hand tool.

44. On September 7, 2022, from 2:09AM until 4:15AM, RIVERA's phone used cellular towers 15 times in Fall River. At 5:37AM, RIVERA's device used a cellular tower that placed the phone at his residence.

45. On September 7, 2022, at 10:26AM, Company 1 reported a sale of 38 catalytic converters by J.J. Company 1 paid J.J. \$9,180.

Catalytic Converter Thefts in Rhode Island

46. On September 22, 2022, RIVERA is observed carrying catalytic converters from the detached garage at his residence and placing them into the trunk of the blue Maxima. The vehicle departed the residence at 9:06AM. A transaction is recorded at Company 1 the same day at 9:26AM for six catalytic converters by J.J.. J.J. received \$1,775. Surveillance footage from

Company 1 shows that the seller traveled to Company 1 in a blue Maxima without a front license plate.

47. A blue Maxima, bearing Massachusetts 7KC469, was observed in Cumberland, RI and Lincoln, RI on September 22, and September 23, 2022, respectively, as the suspect vehicle for catalytic converter thefts. In surveillance footage during the theft in Lincoln, RI, the license plate “7KC469” is observed attached to the rear of the Maxima. J.J. recorded a sale of catalytic converters at Company 1 the following week for \$2,060. Below is a surveillance photo showing a partial image of the blue Maxima and J.J. at Company 1 at the time of the sale (9:29AM).



Catalytic Converter Theft: Attleboro, Massachusetts

48. During surveillance on October 1, 2022, CPD officers observed RIVERA unload approximately 38 catalytic converters from a blue/silver Toyota Highlander¹⁵ parked at his residence on Park Avenue, Cranston, RI. The registration on the vehicle (New Jersey license plate B66NPW) belonged to a Hertz Rental Car.

49. On October 5, 2022, the Attleboro Police Department (“APD”) responded to a larceny of a catalytic converter. An APD report stated in notable part that APD responded to an

¹⁵ RIVERA reserved (using a credit card in the name of his mother M.C.) a Toyota Highlander from September 29, 2022, to October 3, 2022, from a Hertz location at TF Green Airport.

automobile dealership on Washington Street in Attleboro, Massachusetts for the report of multiple catalytic converter thefts. The reporting party explained that a mechanic began working on a vehicle and noticed that the catalytic converter was cut from the vehicle and stolen. The other mechanics canvassed the rest of the vehicles on the property and discovered that, in total, five catalytic converters were missing from five vehicles, including a Ford Escape, a GMC Sierra and a Ford F350, on the vehicle premises.

50. Review of the dealership's surveillance footage showed that on October 3, 2022, at approximately 4:26AM, a light-colored SUV (possibly a newer model silver Toyota Highlander) pulls into the lot on the side, backs into a parking space next to a Ford Escape, and shuts off its lights. Two passengers exit the vehicle while the driver remains in the suspect vehicle. The individual who had exited the front passenger seat is observed emerging from underneath the Ford Escape holding an object. Both parties get back into the light-colored SUV and then drive to the right side of the parking lot, in the area of a GMC Sierra and a Ford F350. Due to the quality of the footage, the activity could not be observed. The suspect vehicle eventually left the parking lot at approximately 4:31AM. A license plate was not observed.

51. Catalytic converters from two vehicles parked in the dealership's overflow lot (out of video surveillance range) were also stolen. Mechanics noted that the vehicles were confirmed intact the week prior (September 28, 2022, and September 29, 2022).

52. On October 3, 2022, at 7:30AM, the Toyota Highlander¹⁶ backs into the driveway at RIVERA's residence. Shortly thereafter, RIVERA, MITCHELL, J.M., and a fourth male remove a floor jack from the Highlander and put in the garage. They proceeded to unload catalytic

¹⁶ RIVERA reserved (using a credit card in the name of his mother M.C.) a Ford Explorer with MA registration of 2WKP15 from October 3, 2022, until October 31, 2022, from the Providence, RI location.

converters from the vehicle to the detached garage and then reload them back into the Highlander and into a gold Honda Accord (belonging to RIVERA's girlfriend). At 8:12AM, both vehicles departed RIVERA's house. At 8:50AM, the same vehicles arrived at Company 1. Company 1 recorded a sale of 57 converters at 8:55AM. Company 1 records show J.J. received \$8,490 for the sale of these converters.

Attempted Interstate Transportation of Stolen Property: Braintree, Massachusetts

53. During the nighttime hours of October 30, 2022, and into October 31, 2022, Braintree Police Department (Braintree, MA) responded to a burglary in progress at a car rental business in their city. Employees of the business were watching their security cameras when they saw three individuals crawl under parked trucks belonging to the business. The business was enclosed by high fences and barbed wires on the top of the fences. As officers approached, the suspects fled. Officers initiated a pursuit. The three thieves were eventually caught. Their clothing matched those worn by the suspects in the security footage. Further investigation revealed that six catalytic converters were removed from the business' trucks, with an estimated \$12,000+ worth of damages. Further, officers retrieved Sawzall, Sawzall blades, and gloves in the presence of the suspects. The three suspects were identified as RIVERA, MITCHELL, and R.R.

Catalytic Converter Thefts: Fitchburg, Massachusetts

54. On November 14, 2022, a Fitchburg State University Police Department ("FSUPD") Officer reported that they were dispatched to a University parking lot, located on North Street, Fitchburg, Massachusetts, for a report of a theft of a catalytic converter. The victim stated that he last used his 2009 Honda Element on November 10, 2022, at approximately 6:15PM. He returned to his vehicle on November 14, 2022, at approximately 4:30PM, at which time he noticed that his catalytic converter was stolen. FSUPD reviewed video surveillance footage and observed

that at 12:02 AM on November 14, 2022, a dark-colored SUV entered the North Parking lot and parked near the reporting party's vehicle. The occupants of the suspect vehicle got out of the SUV and crawled underneath the victim's vehicle. The two parties were underneath the vehicle for less than a minute and at 12:03AM, they departed the area. A MA license plate T39786 (canceled) was observed on the suspect vehicle. Due to the lighting (brake light) and angle of the camera, law enforcement could not observe what was brought back into the vehicle when the occupants returned to the suspect vehicle.

55. On November 15, 2022, a FSUPD Officer responded to the report of a larceny. The reporting party stated that on November 13, 2022, at approximately 2:30PM, he parked his 2008 Honda CRV on the campus of Fitchburg State University in the North Parking Lot (North Street, Fitchburg, MA). When the reporting party returned to his vehicle on November 14, 2022, at approximately 6:00PM to 7:00PM, he discovered that his catalytic converter had been stolen from his vehicle.

56. A review of video surveillance footage showed a dark-colored SUV bearing MA registration T39786¹⁷ entering the same parking lot at approximately 11:50PM on November 13, 2022. The suspect vehicle parked behind the reporting party's vehicle. The suspect is observed leaving the area and then returning to the same spot approximately at 11:54PM. Occupants of this suspect vehicle are observed getting out of the vehicle, then returning to the suspect vehicle, and departing at approximately 11:56 PM.

Surveillance at RIVERA's Residence, Cranston, RI

57. On November 14, 2022, surveillance was conducted at RIVERA's residence on

¹⁷ This license plate was attached to a black Toyota Sienna on August 11, 2022. Surveillance footage captured this vehicle during the theft of a catalytic converter from an unattended vehicle in Cranston, RI.

Park Avenue, Cranston, RI. At 8:53AM, a maroon Honda CRV arrived at RIVERA's residence. Two males exited the Honda CRV and open a detached garage at RIVERA's residence. The CRV pulled into the detached garage and four minutes later pulled out of the garage. At 9:03AM, a silver Mercedes pulled into the driveway at RIVERA's residence. A male party fitting the description of RIVERA got out of the Mercedes and retrieved an item from the trunk of the Mercedes. At 9:06AM, the CRV and the Mercedes left RIVERA's residence.

58. On the same day, at approximately 1:57PM, surveillance shows (as depicted below) a maroon Honda CRV registration T39786 arrived at Company 1. A male passenger fitting the description of ACEITUNO exited the suspect vehicle from the front passenger side and familiarly greeted C.S., one of Company 1's workers. ACEITUNO is observed unloading items from the rear and the backseat of the suspect vehicle. ACEITUNO made two separate transactions (one at 2:00PM and the second at 2:05PM), selling a total of 27 catalytic converters. ACEITUNO received a total of \$9,250 (transaction at 2:00PM \$7,275 and transaction at 2:05PM \$1,975).



Catalytic Convert Thefts: Randolph, MA

59. On October 12, 2022, Randolph Police Department (Randolph, Massachusetts) reported the theft of eight catalytic converters that were stolen from vehicles in their city at approximately 11:30PM the previous night. Two suspects were reported operating a brown Ford Explorer bearing Illinois registration Q214895. On October 13, 2022, surveillance at RIVERA's residence captured RIVERA operating the same brown Ford Explorer bearing Illinois registration Q214895.

60. On October 11, 2022, at approximately 7:13PM, RIVERA and other associates are observed going in and out of the detached garage at RIVERA's residence and into a brown Ford Explorer. The vehicle departed at approximately 7:20PM. At 2:23PM on October 12, 2022, the brown Explorer is captured on surveillance at Company 1. At 2:29PM on the same day, Company 1 recorded a purchase of 46 catalytic converters from J.J.. J.J. was paid \$8,550 for this transaction.

Instagram Communications

61. Law enforcement obtained a federal search warrant for RIVERA's Instagram account "paperxchaser401."¹⁸ Analysis of this account shows that RIVERA communicated with multiple associates regarding the theft, sale, and logistics of stealing catalytic converters. A sample of these communications is provided below to show that RIVERA was engaged in the theft of catalytic converters during the fall of 2022 and ending in early 2023. Further, ACEITUNO, who is, as mentioned above, known to RIVERA and their associates as "Lu" or "Lulu," is engaged in the sale and financial transaction of the catalytic converters.

¹⁸ A review of "Paperxchaser401" account's posts revealed multiple photographs of RIVERA flashing large sums of cash, photographs of RIVERA with vehicles, and a photograph of RIVERA leaning on a newer, bright yellow Chevrolet Camaro taken in Fajardo, Puerto Rico. RIVERA also sends a telephone number known to be used by RIVERA to multiple associates. For these reasons, your Affiant believes this Instagram account was maintained by RIVERA.

62. On February 6, 2023, the following exchange took place between RIVERA and the Instagram account “underratedbikestar” (“I.C.”).

To	From	Time	Message
RIVERA	I.C.	9:34 UTC	Wtw you ain’t been doing the cats
I.C.		9:35 UTC	Nah you need papers outhea to sell em now
I.C.	I.C.	9:35 UTC	Shits wack
RIVERA	I.C.	9:35 UTC	Man stop with that bullshit
RIVERA	I.C.	9:35 UTC	You know how I be coming
I.C.	RIVERA	9:35 UTC	And the cat man’s be burning niggas
RIVERA	I.C.	9:35 UTC	I got the plug
I.C.	RIVERA	9:35 UTC	I had like a good 6 bands the other day in shit he didn’t even wanna give me 3k
I.C.	RIVERA	9:35 UTC	I laughed

63. A press release, dated July 5, 2022, from the State of Rhode Island General Assembly stated that Governor Daniel McKee had signed legislation that was designed to help curb the theft of catalytic converters. The law¹⁹ “requires that purchasers of a catalytic converter, except for business-to-business transactions, obtain either the vehicle registration or the vehicle identification number from the vehicle from which the catalytic converter was removed and provide upon request, the information to a law enforcement agency.” Also, “the name, address, telephone number and date of birth of the seller, as well as a photocopy or digital image of a seller’s photo identification, the seller’s signature, and a complete and accurate description of the property

¹⁹ 2022-H 7751B, 2022-S 2906A.

purchased or sold including any serial numbers or other identifying marks or symbols” will be required.

64. According to the cooperating witnesses (mentioned in Paragraphs 10 and 11), the once lax practices changed to adhere to the new law in early 2023 at Company 1. Employees at Company 1 started to ask for “papers” or documentation as to the origin of the catalytic converter that proved the converter was legally removed from a vehicle. Such documentation included the title or vehicle identification number from the vehicle where the catalytic converter originated. RIVERA and his associates could not provide such paperwork since the catalytic converters they were bringing in were stolen. When RIVERA referred to “a good six bands” he was telling I.C. that he had \$6,000-worth of catalytic converters to sell at Company 1, but they only gave him \$3,000 for the stolen catalytic converters that he brought in to sell. Since the State of Rhode Island was beginning to crack down on the theft of catalytic converters and the theft of catalytic converters was gaining more media attention, especially at Company 1, Company 1 started to offer less money for stolen converters due to the heightened scrutiny on their business.

65. On December 15, 2022, RIVERA and an unknown male (UM) exchanged the following messages regarding “cats”:

From:	To:	Time:	Message:
U.M.	RIVERA	00:25 UTC	Cats still hittin rn?
RIVERA	U.M.	00:25 UTC	Yea that’s something that’ll never die
U.M.	RIVERA	00:25 UTC	I just got rid my self loader like 3 months ago cuz scrap shit
RIVERA	U.M.	00:26 UTC	Ima keep you in mind tho I be think about going back to moving weed sometimes
U.M.	RIVERA	00:27 UTC	I got you wit whatever bro let’s go get this money run it up

66. I believe U.M. is referring to a widely used term for catalytic converters: “cats.” I believe that he knows that RIVERA had been involved in stealing them and making money, so he is asking if that is still the case right now or “rn.” I believe he is referring to a vehicle or attachment that can tilt to load and transport heavy equipment or machinery. I believe he “scrapped” this because the resale for this type of metal was high at this time. However, I believe that UM is also involved in selling marijuana (“weed”) and for this reason RIVERA tells him that he may want to return to selling or “moving weed” and will let UM know if that is the case. I believe that UM confirmed that they both are making money off the sale of marijuana and catalytic converters and they will continue to “run it up” or profit.

67. On January 9, 2023, RIVERA exchanged messages with an account known to your Affiant as B.G.’s boyz.in.bluez account.

From	To	Time	Message
BG	RIVERA	17:46 UTC	What did Lu say?
BG	RIVERA	17:46 UTC	Should I hit up the cat guy
RIVERA	BG	17:48 UTC	Lu been ready cuz
RIVERA	BG	17:48 UTC	He been blowing me up all morning
BG	RIVERA	17:48 UTC	Wya
RIVERA	BG	17:49 UTC	Manton
RIVERA	BG	17:49 UTC	By Wendy’s
BG	RIVERA	17:49 UTC	So what we doing
RIVERA	BG	17:50 UTC	Wya let’s grab the cats n bring em to Lulu
RIVERA	BG	17:50	call ya guy first n see if he’s around if not we just have Lulu

68. I believe that B.G. is asking about the status of ACEITUNO and if he is around to make the transaction at Company 1 for stolen catalytic converters. When RIVERA tells B.G. that ACEITUNO is and has been ready, he tells B.G. that they should grab the “cats” and bring them to ACEITUNO. I believe that given the pattern above, RIVERA stores stolen catalytic converters at his residence in Cranston and then sometime soon after stealing them, he and his associates bring them to Company 1 to sell them. When RIVERA tells B.G. to call his “guy first n see if he’s around,” I believe that he is referring to a cooperating witness in this case, who has sold stolen catalytic converters on behalf of B.G. and his associates.

69. RIVERA exchanged messages with an UM2 who held an account nfazoo. From September 16, 2022, to February 22, 2023, RIVERA and UM2 discuss the logistics of picking up rental vehicles, types of vehicles, and when UM2 is working so that RIVERA can schedule pickups of vehicles during UM2’s shifts. RIVERA shares screenshots of Hertz rental vehicles from the T.F. Green airport location. Based upon their communications (as illustrated below), I believe that UM2 is an employee of Hertz Rentals at the T.F. Green Airport location and is also an associate of RIVERA’s. Below is an excerpt from the communications between RIVERA and UM2.

To:	From:	Date:	Time:	Message:
UM2	RIVERA	9/16/2022	04:54 UTC	Wassup cuz what days you work up there
RIVERA	UM2	9/16/2022	10:51 UTC	Wasup cuz I’m going today
RIVERA	UM2	9/16/2022	14:49 UTC	What time
RIVERA	UM2	9/16/2022	14:50 UTC	You can return me n me in some better
UM2	RIVERA	9/16/2022	16:24 UTC	What chu want a explorer ?them Cherokee’s are best suvs besides that wagoneer and the luxury trucks
RIVERA	UM2	9/16/2022	16:30 UTC	Yea I’ll take a explorer or Cherokee
RIVERA	UM2	9/16/2022	16:30	Or if there’s some luxury cars like the q50

			UTC	or something I'll take that
RIVERA	UM2	9/16/2022	16:31 UTC	As long it's a v6 tbh
RIVERA	UM2	9/16/2022	16:31 UTC	I'm in the blue max atm
UM2	RIVERA	9/16/2022	16:33 UTC	Bet cuz text me tmr in the am it's busy rn
RIVERA	UM2	9/16/2022	16:34 UTC	Igh so ima book this for one more day
UM2	RIVERA	9/16/2022	16:52 UTC	<i>Nfazoo liked a message</i>
UM2	RIVERA	9/18/2022	11:03 UTC	Text me before you come so I can see what I got for you cuz it's gonna be busy today
RIVERA	UM2	9/18/2022	17:32 UTC	Ima just stay with this lemon cause I'm leaving to pr Saturday anyways so I don't wanna get something nice and go tint it n shit just to give it back in a few days
UM2	RIVERA	9/18/2022	17:36 UTC	Na yea dont do that just hit me when u back I'll put you in sum smooov
RIVERA	UM2	10/4/2022	18:03 UTC	You working today ?
UM2	RIVERA	10/4/2022	18:15 UTC	Left already cuz back tmr
RIVERA	UM2	10/4/2022	18:41 UTC	I left my license plate in that highlander
UM2	RIVERA	10/4/2022	18:41 UTC	I got it

70. I believe that the conversation between RIVERA and UM2 on September 16, 2022, shows that RIVERA was the renter and operator of the blue Maxima as described above in Paragraphs 15-21. I believe that he initially was going to exchange the vehicle for something different, but then changed his mind as he already took the time to tint the Maxima and planned to visit Puerto Rico later that week. I believe that this follows a pattern of renting a vehicle, modifying the vehicle so that there is more concealment for the occupants by tinting the windows, and then switching vehicles on a regular basis.

71. I believe that the conversation on October 4, 2022, shows that RIVERA was the

renter and the operator of the Highlander discussed in Paragraphs 23-28. I believe that at some point after returning the rental Highlander, RIVERA realized that he forgot one of the license plates he attached to the Highlander inside the vehicle. I believe that this also shows a pattern of renting vehicles and modifying the vehicles by swapping out the license plates to conceal the registration details of the vehicles.

72. I reviewed the entirety of the exchanges between UM2 and RIVERA. RIVERA and UM2 continue to discuss the rental vehicles, the sale of marijuana, picking up rental vehicles, upgrading vehicles, and at one point, after a breaking and entering that RIVERA subsequently pled guilty to, RIVERA checks with UM2 to see if he is “banned” with Hertz.

73. From October 4, 2022, to December 13, 2022, RIVERA and CM, who used Instagram account criselcangry90, exchanged messages about purchasing license plates. As described in the table below, CM sent the below pictures to RIVERA:



To:	From:	Date:	Time	Message:
CM	Rivera	10/4/2022	17:30 UTC	Any plates?
RIVERA	CM	10/5/2022	2:38 UTC	Soon bro
CM	RIVERA	10/11/2022	19:47 UTC	<i>Cris sent a photo.</i>
CM	RIVERA	10/11/2022	19:51 UTC	<i>Cris sent a photo. (below)</i>
RIVERA	CM	10/11/2022	19:51 UTC	Mass n Florida gone
CM	RIVERA	10/12/2022	3:57 UTC	I'll take Ohio

CW-4

74. In early 2025, CW-4, a co-conspirator, who has not been indicted as part of this conspiracy and whose information has been independently corroborated, provided information on ACEITUNO, MITCHELL, and RIVERA.

75. CW-4 stated that ACEITUNO lived with a girl near Providence College and, as described in greater detail above, the address that the Affiant believed ACEITUNO to reside is directly off campus (approximately 400 feet). ACEITUNO was described as the one who “sold (catalytic converters) for the whole crew.” Before the FBI raided Company 1, ACEITUNO was tipped off by a counter worker at Company 1 when to come and sell stolen converters. ACEITUNO and the worker would text each other and the employee would tell ACEITUNO when things were getting “too hot.” Eventually, the Company 1 employee directed ACEITUNO to another location in Massachusetts where ACEITUNO could sell the converters. This other business hired former Company 1 employees and did not require identification, nor did they ask about the origin of the converters. ACEITUNO sold stolen converters for multiple crews who stole catalytic converters.

76. MITCHELL is not employed nor has he ever been employed as long as CW-4 knew him. MITCHELL is a cutter that was always around RIVERA. They stole converters in Boston,

New York, and Connecticut. MITCHELL is always armed and resides at Goddard Street, but has been known to frequent a trap house on Douglas Avenue in Providence associated with MITCHELL's mother. On at least one occasion, CW-4 observed MITCHELL and his associates split the proceeds of the stolen catalytic converters. CW-4 also saw MITCHELL in possession of high-value items such as luxury clothing, and chains. MITCHELL also took a trip to Florida where he, RIVERA, and other associates stayed in a big house.²⁰ CW-4 identified A.R.²¹ as the mother of MITCHELL's children, who resided in Chad Brown, Providence.

77. RIVERA is known to CW-4 as a cutter, thief (bikes and breaking and entering private homes), and someone who robbed people at gunpoint. Although CW-4 did not steal catalytic converters with RIVERA, CW-4 knew MITCHELL and ACEITUNO to run in the same group.

Tax-Related Misconduct

78. As part of this investigation, IRS-Criminal Investigation Special Agent John Caldarone reviewed ACEITUNO's financial records and tax filings. Based on the IRS-CI agent's review of those records and interviews conducted, there is probable cause to believe that ACEITUNO has filed false federal tax returns in violation of 26 U.S.C. § 7206(1).

79. The elements of filing a false tax return are: (1) an individual made and subscribed to a return, statement, or other document which was false as to a material matter; (2) the return, statement, or other document contained a written declaration that it was made under the penalties of perjury; (3) the individual did not believe the return, statement, or other document to be true

²⁰ RIVERA and MITCHELL's Instagram posts during 2022 show many pictures and videos of them in Florida driving and riding in luxury vehicles.

²¹ The identity of A.R. is known to your Affiant. It is provided in redacted format to comply with Fed. R. Crim. 49.1. A.R. was in a relationship with MITCHELL at the time of these rentals and is the mother of one of his children.

and correct as to every material matter; (4) an individual falsely subscribed to the return, statement, or other document willfully, with the specific intent to violate the law.

80. ACEITUNO filed a Form 1040, U.S. Individual Income Tax Return, for the years 2021 and 2022. Review of those returns revealed that ACEITUNO reported wages from part-time employment and reported self-employed earnings from work as a barber. ACEITUNO did not report earnings from the sale of catalytic converters.

81. For tax year 2021, ACEITUNO sold approximately 898 catalytic converters²² for \$233,665. ACEITUNO failed to report this income on his tax return, resulting in a tax loss to the government of \$58,402.

82. For tax year 2022, ACEITUNO sold approximately 1,230 catalytic converters for \$466,070. ACEITUNO failed to report this income on his tax return, resulting in a tax loss to the government of \$141,506.

83. ACEITUNO paid a tax return preparer to prepare both the 2021 and 2022 tax returns. ACEITUNO failed to disclose to the return preparers the amount of money received from the sale of catalytic converters, causing false tax returns to be filed. ACEITUNO failed to report this income despite disclosing to the return preparers the amounts he earned for cutting hair.

84. ACEITUNO signed both the 2021 and 2022 tax returns, both of which contained a written declaration made under the penalties of perjury.

85. ACEITUNO's failure to disclose income related to catalytic converter sales may conceal the crime of catalytic converter theft as described above.

86. ACEITUNO's claimed income as a barber made him eligible for earned income tax

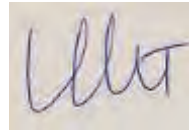
²² This number comes from records seized at Company 1, as well as records maintained by RIAG BCI.

credit available to low to moderate income workers. ACEITUNO received approximately \$5,000 combined in earned income tax credits for tax years 2021 and 2022.

CONCLUSION

87. Based on the foregoing, I believe probable cause exists to find that RIVERA, ACEITUNO, and MITCHELL have committed the crimes of interstate transportation of stolen property in excess of \$5,000 in violation of 18 U.S.C. § 2314, and conspiracy to commit the same, in violation of 18 U.S.C. § 371. I believe probable cause exists to find that RIVERA and MITCHELL have attempted to commit the crime of interstate transportation of stolen property. I also believe ACEITUNO has committed 26 U.S.C. § 7206(1), filing falsified tax returns. Accordingly, I respectfully ask that the Court authorize the issuance of arrest warrants and criminal complaint for RIVERA year of birth 1999, ACEITUNO, year of birth 1997, and MITCHELL, year of birth 1999.

Respectfully submitted,



Lise B. George
Special Agent
Federal Bureau of Investigation

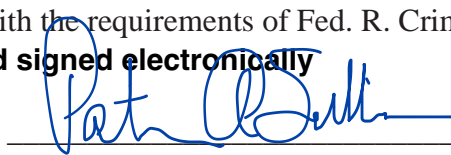
Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone. **Sworn telephonically and signed electronically**

April 4, 2025

Date

Providence, Rhode Island

City and State



Judge's signature

Patricia A. Sullivan, USMJ

Patricia A. Sullivan, U.S. Magistrate Judge