

UNITED STATES DISTRICT COURT
for the
District of Rhode Island

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 6, 2018 in the county of _____ in the
District of Rhode Island, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1029(a)(4)	Knowingly and with intent to defraud, produce, traffic in, have control and custody of and possess device making equipment; and
18 U.S.C. § 1028(a)(5)	Knowingly possess a document-making implement and authentication feature will be used in the production of a false identification document or another document-making implement and authentication feature which will be so used

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Brandon Henderson of the United States Secret Service.

Continued on the attached sheet.


Brian Newell
Complainant's signature

Complainant's signature

Special Agent Brandon Henderson - USSS

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/1/2018



Judge's signature

City and state: Providence, Rhode Island

Lincoln D. Almond, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Brandon Henderson, a Special Agent with the United States Secret Service, hereby make this affidavit in support of a complaint against JUAN JOSE RODRIGUEZ-CASTRO and JOSE ROBELS-BURGOS, who there is probable cause to believe: (1) did knowingly, and with intent to defraud, produce, traffic in, have control and custody of and possess device making equipment, in violation of 18 U.S.C. § 1029(a)(4) (Count One), and (2) did knowingly possess a document-making implement and authentication feature with the intent such document-making implement and authentication feature will be used in the production of a false identification document or another document-making implement and authentication feature which will be so used, in violation of 18 U.S.C. § 1028(a)(5) (Count Two).

1. At approximately 10:30 a.m. on June 6, 2018, C.L. placed a call to 911. C.L. stated that she had been having a Facetime conversation with her boyfriend JUAN JOSE RODRIGUEZ-CASTRO when she saw a home invasion occurring at his residence of 265 Prospect Street, Second Floor, Pawtucket. C.L. stated that she saw a struggle and heard JUAN JOSE RODRIGUEZ-CASTRO state that someone had a firearm.

2. Upon arrival at 265 Prospect Street, Pawtucket Police officers arrested three individuals fleeing the rear door. These three individuals are believed to have committed the robbery inside of 265 Prospect Street, Second Floor. A watch and jewelry belonging to the defendants were found on the suspected armed robbers.

3. Following the arrest of the suspected armed robbers, officers entered 265 Prospect Street, Second Floor to interview the victims of the robbery and to search for the firearm that was believed to have been used in the robbery. Both defendants JUAN JOSE RODRIGUEZ-CASTRO and JOSE ROBELS-BURGOS were within the apartment as was C.L. While speaking with defendants JUAN JOSE RODRIGUEZ-CASTRO and JOSE ROBELS-BURGOS, a Pawtucket Police Detective observed in the dining room a large amount of computer equipment, including a lap top, color printers, a laminating machine and a shredder. The officer also saw a box addressed to Juan Rodriguez which contained a home-made ATM style card reader. The officer also observed in a trash barrel an American Express card in the name of J.S. and a Connecticut driver's license in the name of J.S. These items appeared to be fraudulent. The officer also saw a DHL package containing American Express signature stickers similar to those used on the backs of credit cards. The officer conducted a query of the Connecticut driver's license number and learned that there was no record of that number on file.

4. Based on the discovery of these items in plain view, the Pawtucket Police applied for and obtained a warrant to search 265 Prospect Street, Second Floor. During the execution of the search warrant, officers located and seized a mountain of materials used to fraudulently produce identification documents and credit cards as well as skimming equipment used to fraudulently obtain credit and debit card data of unsuspecting individuals.

5. The items found during the execution of the search warrant include: at least 7 laptops, skimming equipment used to steal credit and debit card information at gas pumps, a mobile credit card reader, the apparent inside of an ATM machine, a photo i.d. card printer, numerous Verizon flip phones, a laminating machine, color printers, numerous flash drives, other card readers, card scanners, blank checks, boxes of identification holograms used to make driver's licenses from the states of Wyoming, Georgia, Indiana, New Jersey, Louisiana, North Carolina, South Carolina, Kentucky, Mississippi, Ohio, Pennsylvania, Florida, Tennessee and Connecticut, 3 Dominican passports in the names of other individuals, numerous blank credit cards with chips, paper cutter, color ribbons and numerous other items commonly used in the creation of fraudulent identification documents and access devices. These items were found throughout the apartment, including in the dining room and in each of the three bedrooms.

6. When being interviewed by the Pawtucket Police as victims of the robbery, both defendants JUAN JOSE RODRIGUEZ-CASTRO and JOSE ROBELS-BURGOS stated that they lived at 265 Prospect Street, Second Floor. The apartment is leased in the names of defendant JOSE ROBELS-BURGOS and C.L., the girlfriend of defendant JUAN JOSE RODRIGUEZ-CASTRO. In addition, a National Grid bill in the name of defendant JOSE ROBELS was found in the premises.

7. There is therefore probable cause to believe that on June 6, 2018, in the District of Rhode Island, defendants JUAN JOSE RODRIGUEZ-CASTRO and JOSE ROBELS-BURGOS: (1) did knowingly, and with intent to defraud, produce, traffic in, have control and custody of and possess device making equipment, in violation of 18 U.S.C. § 1029(a)(4) (Count One), and (2) did knowingly possess a document-making implement and authentication feature with the intent such document-making implement and authentication feature will be used in the production of a false identification document or another document-making implement and authentication feature which will be so used, in violation of 18 U.S.C. § 1028(a)(5) (Count Two).



BRANDON HENDERSON, SPECIAL AGENT
United States Secret Service

Subscribed and sworn to before
me this 7th day of June, 2018
at Providence, Rhode Island.



HON. LINCOLN D. ALMOND
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT