AFFIDAVIT OF SPECIAL AGENT BRANDON HENDERSON IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Brandon Henderson, state:

INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the United States Secret Service and have been since March 16, 2015. I am currently assigned to the New England Electronic Crimes Task Force in the Boston Field Office. My current assignment includes investigating violations of Title 18, United States Code, Sections 1028, 1028A, 1029, 1030, 1341, 1343, 1344, and 1956. I received formal training at the Federal Law Enforcement Training Center in Glynco, Georgia, and the United States Secret Service training academy located in Beltsville, MD. Prior to my employment with the United States Secret Service, I worked as a Sergeant Detective with the Opelika Police Department in Opelika, AL. During my nine and a half years at the Opelika Police Department, I participated in investigations of all types of felony crimes. Prior to and during my work as a police officer, I received formal training at the North East Alabama Law Enforcement Academy and additional training in computer related crimes from the National White Collar Crime Center and the Regional Counterdrug Training Academy, in all aspects of computer related crime and investigative techniques relating to cybercrime.

2. This affidavit is being submitted in support of an arrest warrant and criminal complaint charging Reynaldo Martinez ("Martinez"), YOB 1992, of Central Falls, Rhode Island, with Aggravated Identity Theft, Access Device Fraud, and Bank Fraud.

3. The information set forth in this affidavit is based on my personal participation in this investigation, as well as my training and experience, information received from other law

enforcement officers, including their direct examination of relevant documents and evidence, and reports of interviews with witnesses. This affidavit is intended to show merely that there is probable cause for a criminal complaint.

PROBABLE CAUSE TO BELIEVE THAT FEDERAL CRIMES WERE COMMITTED

4. On or about April 19, 2017, Detective Geoff Dellefratte of the Middletown Rhode Island Police Department called me in reference to an individual that had been committing fraud in Rhode Island and Southern Massachusetts. Detective Dellafratte provided me with the name Reynaldo Martinez and said that the Mansfield, Massachusetts Police Department, Rhode Island State Police (RISP), and Warwick Rhode Island Police Department were all investigating cases in which Martinez was the suspect. Dellefratte provided me with reports from Warwick PD and RISP.

5. On April 20, 2017, I contacted Detective David Kerr with Mansfield PD in reference to their case, Case#: 16-29094. Detective Kerr reported that on December 26, 2016, Police responded to the Sprint Store in Mansfield, MA, in reference to a black male, early 30's, around 5'10" with stubby build, attempting to purchase cell phones with a counterfeit identification (ID). According to the employees the subject was wearing a white Nike Sweatshirt and white baseball hat, the subject also had a blue cast on his left arm. Employees reported that the subject wanted to get three 128GB iPhone 7 devices. The subject provided a Pennsylvania Identification card with the following information:]
, DOB: , , Coraopolis, PA. The employees believed that the Pennsylvania ID was counterfeit so they told the subject that their system was down and did not provide him any service. Detective Kerr determined that the same subject had

gone to Verizon, T-Mobile, and Best Buy, all in Mansfield, Massachusetts and tried to purchase cell phones at each location using the same Pennsylvania Identification card.

6. Utilizing databases available to me as a Law Enforcement officer I located a white male named with a Pennsylvania Driver License , DOB: 09/25/XXXX, with an address of Pittsburgh, PA 15205. When I ran a history of addresses it showed that he had previously lived at , PA. Which matched the address on the suspected counterfeit identification that was being used.

7. Detective Kerr obtained snapshots of the video surveillance at Best Buy in Mansfield, Massachusetts and posted the snapshots to an internet websites, "Rhode Island Most Wanted" and "Mass Most Wanted." Both of these websites are popular with law enforcement officers attempting to identify suspects. After having posted the still images, Detective Kerr received four anonymous tips from "Rhode Island Most Wanted" identifying the subject as Reynaldo Martinez. One of the tips listed his address as "the Avalon" apartment. I know this apartment complex to be located at 50 Park Row W, Providence, RI.

8. On February 15, 2017 Detective Kerr was covering Attleboro District Court and noticed the name Reynaldo Martinez on the court's docket. Detective Kerr observed Martinez, who fit the physical description of the subject in the images, and also observed a blue cast on his left arm, matching the images from Best Buy and the statement of the employees. Based on these facts, and the anonymous tips, Detective Kerr obtained four warrants for Massachusetts state criminal violations including, RMV ID Card Fraud and attempting to commit the offense of Fraudulent Use of a Credit Card Over $250.

9. I also contacted the Rhode Island State Police Barracks and spoke with Cpl. Luke Brisson in reference to case#: 16RIK2-882-OF, involving Reynaldo Martinez. Cpl. Brisson reported that he was contacted by Ryan Kane, General Manager at In-Skip Auto Mall, 1515 Bald Hill Rd, Warwick, RI 02886. Kane reported that an individual identified as Reynaldo Martinez (DOB: 08/06/XXXX) brought his 2016 Infiniti sedan, New York Registration Tag#: HFV2056, in to get repair work completed. Martinez provided a Rhode Island Driver's License #2847657, later determined to be counterfeit. State Police determined that the license number had not been issued and there was a misspelling on the face of the identification card. The vehicle was left at In-Skip and a repair was needed that was going to cost approximately $14,000.00. Kane reported that Martinez initially paid $1,200.00 using his credit card and told the business that his family was helping him pay for the remaining balance on the maintenance. Using an internet site that allowed credit card payments to be made, six separate payments toward Martinez's balance were made. Each additional payment was made online using a virtual payment terminal operated by CENPOS. CENPOS is an online virtual terminal credit card processing company located in Miami, Florida. CENPOS allows customers to make credit card payments online. The payment links were sent to the email address provided by Martinez: reynaldomartinez14@hotmail.com. The six cards used all returned as being fraudulently used. The accounts belonged to the below individuals:

i. , Little Rock, AR, for $2,000.00

ii. Davidson, OK, for $2,000.00

iii. , Simi Valley, CA, for $2,000.00

iv. , Los Angeles, CA for $2,330.00

v. ., Farmington, RI, for $2,333.00

vi. for $2,075.03

10. On November 4, 2016, Cpl. Brisson met with Service Manager Ronald Antonucci and presented him a photo line-up inclusive of Reynaldo Martinez. Antonucci identified Martinez (DOB: 08/06/XXXX) as the customer seeking the repair work. Cpl. Brisson later obtained warrants for Martinez for violations of Rhode Island General Laws including Obtaining money/goods/services Under False Pretense and Possession of False Identification.

11. While speaking with Cpl. Luke Brisson regarding his case, he told me that RISP Detective Stephen Brown was also actively investigating a case involving Reynaldo Martinez.

12. Additionally on April 20, 2017, I called Warwick Rhode Island PD Detective David Morrow in reference to his case relating to Reynaldo Martinez. Detective Morrow told me that he had two cases 17-9432 and 17-5360. Detective Morrow provided reports for both cases and the information is detailed below.

13. On January 30, 2017, Warwick Police Officer Steven Moretti met with P F at Warwick Police Headquarters, in reference to an Identity Theft report. eported that on December 26, 2016, his Best Buy credit account was used by an unknown person to purchase goods valued at $3,744.93. Fortini reported that he was in Arizona on vacation when the charges occurred. Detective Morrow was assigned to the case for further follow-up.

14. Detective Morrow discovered that the Identity Theft was an "account look-up" at Best Buy, which meant that the suspect was not in possession of an actual credit card and therefore had to provide identification in the cardholder's name as well as provide personal

identifying information of the cardholder for the transaction to be approved. Detective Morrow viewed the video surveillance and observed a black male and black female at the register. The male was wearing a White Nike sweatshirt with black swoosh on the front, white cap, and had a blue cast on his left arm. Video surveillance depicts that male getting into a black Infiniti with New York Tag#: HFV2056. The registration for that vehicle returns to Reynaldo Martinez DOB: 08/06/XXXX.

15. Detective Morrow looked on "Rhode Island Most Wanted" and saw the Mansfield PD case from the same date. The photos from both cases show the same person committing crimes in both jurisdictions on December 26, 2016. Detective Morrow compared the video surveillance from Best Buy to the Massachusetts Driver's license photo of Martinez and positively identified the suspect in Warwick as Martinez. The vehicle that the merchandise was loaded into, black Infiniti sedan New York Tag# HFV2056, is also registered to Martinez.

16. Additionally, on February 14, 2017, Detective Morrow received a phone call from , the wife of . Mrs. reported that Best Buy issued them a new credit account and card and they received a phone call on February 13, 2017, from the credit card company alerting them that purchases were being attempted on the new Best Buy account at the Warwick store. Two purchases, one for $3,258.08 and one for $1,920.58 were attempted. Detective Morrow viewed the video surveillance of these two transactions and was able to confirm that it was also Reynaldo Martinez, same blue cast on his left arm, in the same Infiniti.

17. On February 21, 2017, Detective Morrow met with at Warwick PD Headquarters in reference to an Identity Theft report #17-747-OF. Joyce reported that his

Best Buy account had been compromised on February 13, 2017, the same day as second compromise. reported two transactions:

i. 5:43 PM for $1,352.48

ii. 5:48 PM for $2,768.04 for two 48-inch Sony Televisions

Both transactions were "Account Look Ups", meaning that whoever did them provided a form of identification and had to answer security questions. Detective Morrow reviewed the surveillance stills and the suspect matches the description of Reynaldo Martinez, furthermore the Sony televisions are loaded into the rear of Martinez's Black Infiniti sedan.

18. On April 21, 2017, I contacted Detective Stephen Brown of the RISP in reference to his case against Reynaldo Martinez. Brown reported that he was contacted by West Hartford Connecticut Police Department for assistance on an Identity Theft case for a victim they identified as reported to West Hartford Police that his retail credit account at Raymour and Flanigan, a national furniture store chain, had been used to order $4,297.12 worth of merchandise. reported that on February 19, 2017 he received an email from Raymour and Flanigan with reference to his retail credit account purchase for items from the Warwick, RI store. immediately contacted the store and canceled the order and advised Raymour and Flanigan that he had not made the purchase. The order showed] ; information in the billing section, but listed an address of 23 Yorkshire Street, Apartment #2, Providence, RI, and phone number (401)919-1199 for delivery.

19. On 03/06/2017, Detective Brown met with Ms. the salesperson from the transaction. said that she was working on February 19, 2017 and that she was the salesperson that assisted . was unable to remember what type of car he got out of but he told her that it was a "Lyft" ride. also remembered that his

shirt said, "I don't care if you like me or not, I don't give a fuck." said that the suspect provided her with pictures of items that he was interested in and referred to it as a "Dope bedroom set". did remember that he provided her a Connecticut Driver's License in the name of with an address that matched what was in their system, as well as a credit card with the name embossed on it. told her that he moved out of Connecticut because he was getting into too much trouble.

20. On March 20, 2017, Detective Brown obtained search warrants for T-Mobile and Lyft accounts linked to phone number 401-919-1199.

21. On March 24, 2017, Detective Brown received records from Lyft which provided the following information:

    - User Name: Chunky Martines
    - Telephone Number: (401)919-1199
    - Email address: reynaldomartinez14@hotmail.com
    - Nine rides were taken on the platform by user "Chunky Martinez" between 02/19/2017 and 03/20/2017. The two rides below are pertinent to this investigation due to them being related to fraud at Raymour and Flanagan located at 444 Quaker Lane, Warwick, RI and the suspect's residence at 535 Roosevelt Ave, Unit 501, Central Falls, RI.

        i. 2/19/2017: pick-up time 5:00:48 PM at 581 Roosevelt Ave, Central Falls, RI, Drop off time 5:26:21 PM at 557 Quaker Lane, Warwick, RI (It should be noted that Raymour and Flanigan is located in a shopping center at 444 Quaker Lane, Warwick, RI)

ii. 2/19/2017: pick-up time 6:31:00 PM at 434 Quaker Lane, Warwick, RI, Drop off time 6:57:01 PM at 617 Roosevelt Avenue, Central Falls, RI

22. On April 14, 2017, Detective Brown received a return from T-Mobile:

- Subscriber Name: Julius O Shaw
- Subscriber Address: 10 John St., Attleboro, MA
- Date of Birth: 06/12/1996
- Subscriber Status: Canceled
- Activation Date: 1/22/2017
- Termination Date: 3/27/2017
- MSIDSN Name: Reynaldo Martinez
- Further review of the records revealed a phone call on February 20, 2017 at approximately 4:30:56 PM an incoming call was received by (401)919-1199 from (401)589-2053, which is the registered telephone number for Raymour and Flanigan in Warwick, RI.

23. Detective Brown investigated the name Julius Shaw and determined that the suspect at Raymour and Flanigan was not Shaw. Detective Brown investigated the name Reynaldo Martinez, DOB: 08/06/XXXX, and located a last known address of 10 John St., Attleboro, Massachusetts, the same address provided for the T-Mobile cell phone. Detective Brown ran a criminal history and saw an arrest by Warwick PD on March 24, 2017. Detective Brown obtained the arrest report from Warwick PD and Martinez provided Warwick Police with the same phone number provided to Raymour and Flanigan (401)919-1199.

24. Additionally the email address provided to In-Skip Auto Mall, reynaldomartinez14@hotmail.com, is the same email address provided to Lyft upon opening the account linked to Martinez's phone number (401)919-1199.

25. Around May 3, 2017 I was notified by multiple agencies that Seekonk Police Department had posted photos of Reynaldo Martinez on Rhode Island Most Wanted and Mass Most Wanted.

26. On May 5, 2017, I spoke with Detective David Mahoney, Seekonk Police Department, in reference to his case on Reynaldo Martinez. Detective Mahoney reported that Kohl's Loss Prevention Officer (LPO) Jill Rupert called Seekonk Police in reference to a black male, later identified as Reynaldo Martinez. Rupert reported that Martinez entered the store and picked up Chaps towels before asking the manager to get him two Apple Watches. When he went to the counter he requested to do an "Account Look Up" and provided a Connecticut Driver's License in the name of Martinez signed for the purchase and departed. LPO Rupert contacted Kohl's Corporate to get information on account. Kohl's corporate confirmed with the true that the purchase was fraud. The surveillance footage was posted online and identification was made by multiple agencies that had all arrested Martinez for the same type of criminal activity.

27. On May 7, 2017 Central Falls Police Department arrested Reynaldo Martinez as a fugitive from justice for the outstanding warrants from Seekonk, Massachusetts. Martinez was arrested at his apartment 535 Roosevelt Ave, Unit 501, Central Falls, Rhode Island. On May 10, 2017, I met with Detective Jeff Arujjo, Central Falls, Rhode Island Police Department. Detective Arujjo told me that he received a tip on May 6, 2017 that a wanted subject on one of the Most Wanted websites was living at 535 Roosevelt Ave, Unit 501, in

Central Falls. According to the tip the subject was named However the wanted person was Reynaldo Martinez living under the alias of . Based on the tip Detective Arujjo responded to Unit 501 and arrested Reynaldo Martinez.

28. I met with the Landlords of the apartment building at 535 Roosevelt Avenue, Central Falls, RI. They provided me with copies of the documents provided to them to rent the apartment. The landlords told me that they know Reynaldo Martinez as with DOB: 08/24/XXXX. Martinez provided completely false information to rent the apartment. Martinez also provided a Rhode Island Driver's License in the name to acquire the apartment. The Rhode Island Driver's License provided has a misspelled word. The License number returns to of Warwick, Rhode Island. Using databases available to me as a Law Enforcement Officer I had an analyst run the name and Social Security Number (SSN) provided by Martinez. The SSN provided by Martinez was issued to a female, identified as in Utah in 2007 or 2008. I have been unable to locate at this time.

29. On May 10, 2017, I contacted the victim in Seekonk case, from Hamden, Connecticut. Aden reported to me that the individual had accessed his retail credit account at Kohl's, Home Depot, Sak's Fifth Avenue, and Fortiva Retail Credit (Cardi's Furniture).

30. I contacted Graeme Carlton, Asset Protection Manager for Boston Saks Fifth Avenue store located at 800 Boylston St., Boston, Massachusetts, in reference to getting surveillance video from the date when Aden's account was used. Carlton had experience with Reynaldo Martinez from a past case in 2013. Carlton provided me with the transaction receipt for $2,906.20 on April 22, 2017 at 7:47 PM. Carlton was unable to provide video footage at the register, but was able to locate Reynaldo Martinez inside the store at the time of the

purchase. The receipt from the transaction shows that a Connecticut DL was used to do an account look up.

31. On May 12th, 2017, I spoke with Cardi's Furniture in reference to the account created in name. Cardi's provided me with a receipt for $4,400.35 of furniture purchased at their Swansea location, One Furniture Way, Swansea, Massachusetts, using the account. Cardi's also provided me with a copy of the Connecticut Driver's License used to obtain the account. The photo is of poor quality but appears to be of a black male and matches the general description of Reynaldo Martinez. The purchased furniture was delivered on 4/25/2017 to 535 Roosevelt Avenue, Central Falls, RI, which is confirmed as the current address for Reynaldo Martinez as of May 10, 2017.

32. Cardi's also provided me two additional accounts linked to the same delivery address of 535 Roosevelt Ave, Central Falls, RI.

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33. On May 15, 2017, I recovered surveillance images from Cardi's furniture, 1681 Quaker Lane, West Warwick, RI, for a transaction that occurred using the name The surveillance images appear to be of suspect Reynaldo Martinez. Additionally, the delivery address is the most recent known address of Reynaldo Martinez, 535 Roosevelt Ave, Central Falls, RI. The email address provided is: ljaffairs21@gmail.com. Which is linked to three other Cardi's accounts in various other victim names.

Based on all of the foregoing facts, I submit that there is probable cause to believe that Reynaldo Martinez, on various days and dates between December 1, 2016 and May 16, 2017 committed the crime of Aggravated Identity Theft and Access Device Fraud, in violation of 18 U.S.C. §§ 1028A and 18 U.S.C. §§ 1029.

I declare that the foregoing is true and correct.

Brandon Henderson
Special Agent
U.S. Secret Service

Subscribed and sworn to before me this 17th day of May, 2017.

HONORABLE LINCOLN D. ALMOND
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF RHODE ISLAND