

25 MAG 1395

UNITED STATES OF AMERICA

v.

MICHEAL PENA,
HARRINGTON DELAHOZ,
JOSHUA GUTIERREZ, and
JAYSEN DORSEY,

Defendants.

COMPLAINT

Violations of 18 U.S.C. §§ 1349, 1028A,
and 2

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK:

ERIN T. CARMODY, being duly sworn, deposes and says that she is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE

(Conspiracy to Commit Bank Fraud and Wire Fraud)

1. From at least in or about April 2023 through at least in or about October 2024, in the Southern District of New York and elsewhere, MICHEAL PENA, HARRINGTON DELAHOZ, JOSHUA GUTIERREZ, and JAYSEN DORSEY, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, and to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that MICHEAL PENA, HARRINGTON DELAHOZ, JOSHUA GUTIERREZ, and JAYSEN DORSEY, the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, PENA, DELAHOZ, GUTIERREZ, and DORSEY agreed to make and cause to be made misrepresentations to a mobile payment platform to persuade such platform to open accounts under false and fraudulent pretenses and thereafter obtain funds through such accounts.

3. It was further a part and an object of the conspiracy that MICHEAL PENA, HARRINGTON DELAHOZ, JOSHUA GUTIERREZ, and JAYSEN DORSEY, the defendants, and others known and unknown, knowingly would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and

fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, PENA, DELAHOZ, GUTIERREZ, and DORSEY agreed to make and cause to be made false statements in order to obtain funds to which they were not entitled, including by fraudulently depositing stolen and altered checks into accounts at various financial institutions.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Aggravated Identity Theft)

4. From at least in or about April 2023 through at least in or about October 2024, in the Southern District of New York and elsewhere, MICHEAL PENA, HARRINGTON DELAHOZ, JOSHUA GUTIERREZ, and JAYSEN DORSEY, the defendants, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit PENA, DELAHOZ, GUTIERREZ, and DORSEY deposited stolen and altered checks using the banking information of third parties, and transmitted to a mobile payment platform fake driver's licenses using the names and dates of birth of third parties during and in relation to the conspiracy charged in Count One of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

5. I have been a Postal Inspector with USPS since in or about January 2022, and I have been personally involved in this investigation. My duties and responsibilities include the investigation of mail theft, robbery, bank and wire fraud, and related crimes. This affidavit is based on my involvement in this investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Scheme

6. From at least in or about April 2023 up to and including at least in or about October 2024, MICHEAL PENA, HARRINGTON DELAHOZ, JOSHUA GUTIERREZ, and JAYSEN DORSEY, the defendants, and others known and unknown, carried out a national scheme to sell more than \$53 million in stolen checks and to fraudulently alter stolen checks that they then deposited at various financial institutions. As part of that scheme, PENA operated and used a channel on a particular messaging platform ("Messaging Platform-1"), which goes by the moniker "White House VibeZ," to sell checks that had been stolen from the United States Postal Service ("USPS"). During the relevant time period, White House VibeZ had thousands of subscribers. Additionally, during this period, PENA, DELAHOZ, GUTIERREZ, and DORSEY deposited hundreds of thousands of dollars in stolen checks, including checks posted for sale on White House VibeZ. Before such checks were deposited, they were "washed," which is a process, done either

physically or electronically, by which the payee's information and amount on the check are removed and rewritten to reflect another payee's identity and amount.

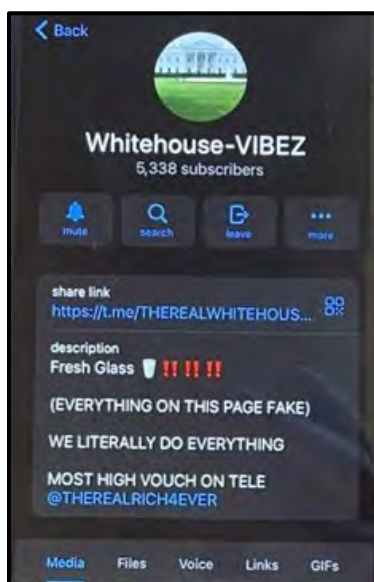
The Messaging Platform-1 Channel – White House VibeZ

7. Based on my participation in this investigation, my review of documents and records, and my communications with other Postal Inspectors from USPS and other law enforcement personnel, I have learned, in substance and in part, the following:

a. In or about November 2023, law enforcement began monitoring the Messaging Platform-1 channel with the name "Whitehouse VibeZ, t.me/THEREALWHITEHOUSEVIBEZ" ("White House VibeZ"). Based on my training and experience, I know that a channel is a feature of Messaging Platform-1 that is used to send messages to a large group of users. When Messaging Platform-1 users subscribe to a given channel, they can view messages sent by the administrator of the channel, or those specifically authorized by the administrator to post on the channel, to its subscribers. Any Messaging Platform-1 user can subscribe to a channel. Accordingly, a Messaging Platform-1 channel's contents are publicly available.

i. White House VibeZ was created on Messaging Platform-1 on or about February 8, 2022, and the last post was publicly made on or about October 17, 2024.

ii. Based on my review of publicly available information, it appears that the administrator of White House VibeZ (the "Administrator") was a Messaging Platform-1 user with the username @THEREALRICH4EVER. The profile of the channel included a link to the profile of @THEREALRICH4EVER. Below is a photograph of the White House VibeZ profile, taken as of on or about April 18, 2024, which lists that, at that time, there were approximately 5,338 subscribers to the channel. The profile also advertises "fresh glass," which, based on my training and experience, I understand refers to real checks that have been recently stolen. Additionally, the profile indicates that the channel has the "most high vouch on tele[gram]," which, based on my training and experience, I understand means that the channel is highly regarded by purchasers on Messaging Platform-1.

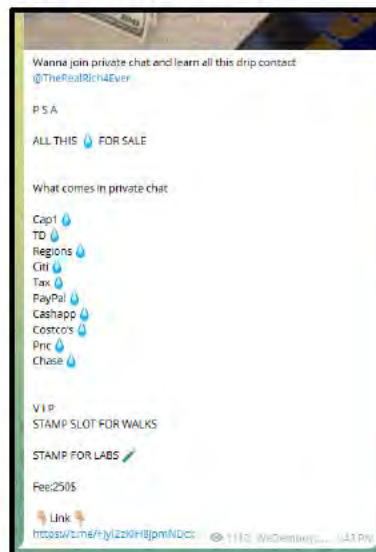


b. Based on my review of the White House Vibez channel, from at least on or about April 23, 2023 until at least on or about October 17, 2024, numerous images of checks were posted for sale that appear to have been stolen from victims located in several states, including New York, New Jersey, Pennsylvania, Maryland, Florida, and Texas, as well United States Treasury checks. The routing and account numbers on the checks were not visible in the posted images. On occasion, personal identifying information of the payor of the stolen checks, such as social security numbers and dates of birth, was also offered as part of the purchase.¹ Sometimes, the post listed the price for a check and other times, interested parties needed to directly message the Administrator to find out the price. Checks that were sold were, at least sometimes, marked “SOLD.”

i. Below is a screenshot reflecting an example of a check that was marked as sold²:



ii. Below is a screenshot of a post on White House Vibez directing subscribers to contact the Administrator for information regarding stolen checks. Based on my training and experience, as well as my participation in this investigation, I understand that “drip” or the water droplet image means “fraud” or “fraudulent checks.”



¹ Based on my training and experience, as well as my participation in this investigation, I understand that the purchaser of the stolen check might use that information to identify the amount of funds available in the payor’s account and, therefore, determine the amount that the purchaser could list on the check, after washing it, to obtain the maximum amount of funds from the payor’s account.

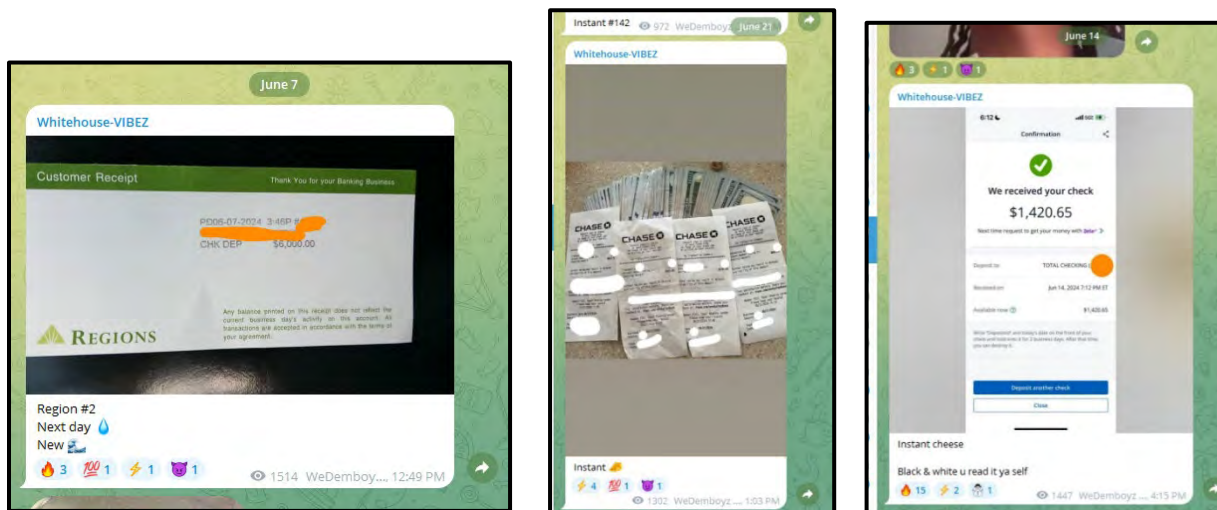
² Visible personal identifying information has been redacted with a black box.

iii. Below is an image that was posted on White House Vibez on or about February 19, 2024, depicting what appears to be stolen mail and checks with the caption: “Uppy of the year coming soon,” which, based on my training and experience, I understand means that a large amount of stolen checks were going to be uploaded soon for sale on the channel.



c. On the White House Vibez channel, purchasers of checks were directed to send payment to several accounts on a mobile payment platform (“Payment Platform-1”), including those with the tags “\$MillionaireMus,” “\$BillionaireMus,” “\$BillionaireMus,” “\$RichCantBeStop,” “\$CantStopRich,” “\$RichRTB,” and “\$AllMoneyinRTB.” It appears that the Administrator typically utilized a particular Payment Platform-1 account until it was shut down by Payment Platform-1, and then opened a new Payment Platform-1 account to continue receiving proceeds from the sales of checks (and notified their subscribers of the same).

d. The Administrator also claimed to have deposited fraudulently altered checks at various financial institutions and posted receipts of such deposits and of cash withdrawals on White House Vibez, in an apparent attempt to attract potential purchasers and convey the ease with which purchasers could make money through the scheme. For example, below are screenshots from in or about June 2024 depicting posts of receipts of check deposits and cash withdrawals, including with captions such as “Instant [cheese]” and “Next Day [drip].” Based on my training and experience, I understand these terms to mean that fraudulent proceeds are available instantly or the next day.



e. Between approximately on or about April 23, 2023, and on or about October 17, 2024, more than \$53 million of checks were posted for sale on White House VibeZ.³ Based on records from Payment Platform-1, I have learned that, during this period, the Payment Platform-1 accounts posted on White House VibeZ that were used to receive payment for these stolen checks received more than \$750,000.

f. On or about June 27, 2024, law enforcement personnel, using an undercover Messaging Platform-1 account, purchased an approximately \$1,000 check (the “UC Check”) from the Administrator—that is, the Messaging Platform-1 user @THEREALRICH4EVER. When law enforcement contacted @THEREALRICH4EVER on Messaging Platform-1 and asked for the cost of the UC Check, @THEREALRICH4EVER agreed to sell the check for approximately \$225. Payment was made via Payment Platform-1 and @THEREALRICH4EVER sent law enforcement a photograph of the UC Check with routing and account numbers visible. The Administrator then posted a screenshot of the Payment Platform-1 payment confirmation on White House VibeZ.

Identification of the Defendants as Participants in the Scheme

8. Based on my participation in this investigation, my review of content on White House VibeZ, documents, and records, including records from Payment Platform-1 and several financial institutions, and my communications with other Postal Inspectors from USPIS and other law enforcement personnel, I have learned that MICHEAL PENA, the defendant, is the Messaging Platform-1 user @THEREALRICH4EVER and the Administrator. Specifically, I have learned, in substance and in part, the following:

a. As described in paragraph 7.c. above, purchasers of checks were directed to send payment to several Payment Platform-1 accounts.

³ Based on my participation in this investigation, I have learned that this figure represents the total amount listed on the original checks. After “washing” these checks, purchasers of these stolen checks are able to write any dollar amount on the checks.

b. During the time that they were in use, each of the Payment Platform-1 accounts listed in paragraph 7.c. was linked to, among others, a debit card connected to a bank account controlled by PENA. Specifically, Payment Platform-1 accounts “\$Millionairemus” and “\$BillionaireMus” were linked to a debit card associated with a bank account in the name of PENA at a particular financial institution (“Financial Institution-1”), Payment Platform-1 accounts “\$Billiionairemus,” “\$RichCantBeStop,” “\$CantStopRich,” and “\$RichRTB” were linked to a debit card associated with a bank account in the name of PENA at a second financial institution (“Financial Institution-2”), and the Payment Platform-1 account “\$AllMoneyinRTB” was linked to two debit cards associated with a bank account in the name of PENA at a third financial institution (“Financial Institution-3”).

c. Below are images of PENA on or about February 12, 2024 (left) and on or about March 27, 2024 (right), withdrawing cash from his bank account at branches of Financial Institution-2. Law enforcement officers were able to identify PENA based on a comparison to photographs of PENA maintained in law enforcement databases:



d. Large amounts of money were transferred from many of these Payment Platform-1 accounts directly to PENA’s bank accounts. For example, PENA’s account at Financial Institution-2 received: (i) over approximately \$21,000 from \$Billionairemus between on or about November 3, 2023 and on or about December 15, 2023; (ii) over approximately \$44,000 from \$RichCantBeStop between on or about December 15, 2023 and on or about January 25, 2024; (iii) over approximately \$58,000 from \$CantStopRich between on or about January 25, 2024 and on or about April 4, 2024; and (iv) over approximately \$37,000 from \$RichRTB between on or about April 4, 2024 and on or about June 6, 2024. PENA’s account at Financial Institution-3 received over \$78,000 from \$AllMoneyinRTB between on or about June 19, 2024 to on or about September 18, 2024.

e. Additionally, during the period that White House VibeZ was active, law enforcement searched on Messaging Platform-1 for the phone number linked to PENA’s accounts at Financial Institution-1, Financial Institution-2, and Financial Institution-3, and found that the phone number was linked to the Messaging Platform-1 user @THEREALRICH4EVER (that is, the Administrator).

f. On or about October 17, 2024, PENA was arrested in Lowndes County, Georgia for identity fraud and financial card theft, in violation of Georgia Code §§ 16-9-121 and 16-9-31. Law enforcement seized two cellphones that PENA claimed ownership of, including a cellphone assigned the same call number as that linked to the Administrator on Messaging Platform-1. The date of PENA's arrest in Georgia was also the same date as the last post on White House Vibez described above, *see supra* paragraph 7.a.

9. Based on my participation in this investigation, my review of content on White House Vibez, documents, and records, including records from Payment Platform-1, and my communications with other Postal Inspectors from USPS and other law enforcement personnel, I have learned that JOSHUA GUTIERREZ and HARRINGTON DELAHOZ, the defendants, set up Payment Platform-1 accounts that were posted on White House Vibez to receive payments for purchases of stolen checks. Specifically, I have learned, in substance and in part, the following:

a. The Payment Platform-1 account "\$RichCantBeStop" was opened on or about December 15, 2023. In connection with opening this account, the subscriber ("Subscriber-1") provided Payment Platform-1 with a purported driver's license and a photograph of himself as proof of identity.

b. I have compared images of GUTIERREZ on law enforcement databases with the purported driver's license and photograph provided to Payment Platform-1 by Subscriber-1. I believe that GUTIERREZ and Subscriber-1 are the same person, including because GUTIERREZ has the same physical appearance and facial features as Subscriber-1.

c. Based on my review of the purported driver's license and associated records, I have learned that it contains personal identifying information, including the name, date of birth, and address of another individual who is not GUTIERREZ. Accordingly, I believe that this is a fake driver's license.

d. \$RichCantBeStop received over approximately \$44,000 between on or about December 15, 2023 and on or about January 25, 2024.

e. The Payment Platform-1 account "\$CantStopRich" was opened on or about January 25, 2024. In connection with opening this account, the subscriber ("Subscriber-2") provided Payment Platform-1 with a purported driver's license and photographs of himself as proof of identity.

f. I have compared images of DELAHOZ on law enforcement databases with the purported driver's license and photographs provided to Payment Platform-1 by Subscriber-2. I believe that DELAHOZ and Subscriber-2 are the same person, including because DELAHOZ has the same physical appearance and facial features as Subscriber-2.

g. Based on my review of the purported driver's license and associated records, I have learned that it contains personal identifying information, including the name, date of birth, and address of another individual who is not DELAHOZ. Accordingly, I believe that this is a fake driver's license.

h. \$CantStopRich received over approximately \$97,000 between on or about January 25 2024 and on or about April 4, 2024.

10. Based on my participation in this investigation, my review of content on White House VibeZ, documents, and records, including records from Payment Platform-1 and several financial institutions, and my communications with other Postal Inspectors from USPS and other law enforcement personnel, I have learned that JAYSEN DORSEY, JOSHUA GUTIERREZ, and HARRINGTON DELAHOZ, the defendants, deposited fraudulently altered checks⁴ at various financial institutions into bank accounts in the names of other individuals, evidence of which was, in at least some instances, then posted on Messaging Platform-1 by MICHEAL PENA, the defendant. Specifically, I have learned, in substance and in part, the following:

a. Based on my review of records and surveillance footage and images from financial institutions, I have learned that between in or about May 2023 and in or about May 2024, DORSEY deposited numerous fraudulent checks at financial institutions totaling over approximately \$98,000. At least some of the checks that DORSEY deposited had been posted for sale on White House VibeZ. For example:

i. On or about May 30, 2023, a check was posted on White House VibeZ with a listed payor in Philadelphia, Pennsylvania and marked as sold. On or about June 14, 2023, a check with the same payor and the same check number, but with a different amount and payee (“Check-1”) was deposited at a branch of a particular financial institution (“Financial Institution-4”) in New York, New York.

ii. On or about July 3, 2023, a check was posted on White House VibeZ with a listed payor in Springfield, Virginia. On or about July 13, 2023, a check with the same payor and the same check number, but with a different amount and payee (“Check-2”) was deposited at a branch of Financial Institution-4 in the Bronx, New York.

iii. I have compared images of DORSEY on law enforcement databases with surveillance images of the person who deposited Check-1 (“Suspect-1”) and the person who deposited Check-2 (“Suspect-2”). I believe that DORSEY, Suspect-1, and Suspect-2 are the same person, including because DORSEY has the same physical appearance and facial features as Suspect-1 and Suspect-2. An image of DORSEY from law enforcement databases dated on or about December 27, 2023 (left) and surveillance images of Suspect-1 (center) and Suspect-2 (right) are depicted below:



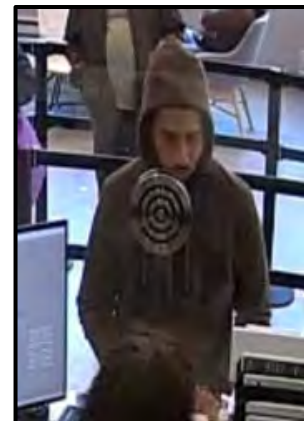
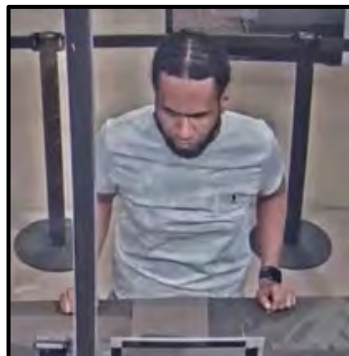
⁴ Based on my training and experience, I believe that these checks were “washed” to replace the payee and amount.

b. Based on my review of records and surveillance footage and images from financial institutions, I have learned that between in or about July 2023 and in or about April 2024, GUTIERREZ deposited numerous fraudulent checks at financial institutions totaling over approximately \$72,000. At least some of the checks that GUTIERREZ deposited had been posted for sale on White House VibeZ. For example:

i. On or about May 5, 2023, a check was posted on White House VibeZ with a particular payor. On or about August 2, 2023, a check with the same payor and the same check number, but with a different amount and payee (“Check-3”) was deposited at a branch of Financial Institution-4 in Brooklyn, New York.

ii. On or about September 9, 2023, a check was posted on White House VibeZ with a particular payor. On or about October 26, 2023, a check with the same payor and the same check number, but with a different amount and payee (“Check-4”) was deposited at a branch of Financial Institution-4 in New York, New York.

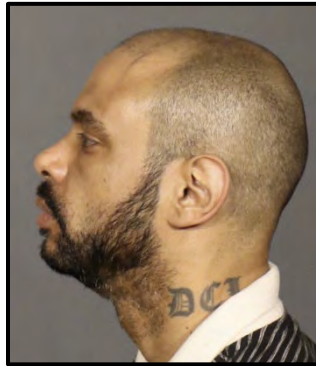
iii. I have compared images of GUTIERREZ on law enforcement databases with surveillance images of the person who deposited Check-3 (“Suspect-3”) and the person who deposited Check-4 (“Suspect-4”). I believe that GUTIERREZ, Suspect-3, and Suspect-4 are the same person, including because GUTIERREZ has the same physical appearance and facial features as Suspect-3 and Suspect-4. An image of GUTIERREZ from law enforcement databases dated on or about March 17, 2023 (left) and surveillance images of Suspect-3 (center) and Suspect-4 (right) are depicted below:



c. Based on my review of records and surveillance footage and images from financial institutions, I have learned that between in or about May 2023 and in or about January 2024, DELAHOZ deposited numerous fraudulent checks at financial institutions totaling over approximately \$40,000. At least some of the checks that DELAHOZ deposited had been posted for sale on White House VibeZ. For example:

i. On or about July 3, 2023, a check was posted on White House VibeZ with a listed payor in Springfield, Virginia. On or about July 14, 2023, a check with the same payor and with the same check number, but with a different amount and payee (“Check-5”) was deposited at a branch of Financial Institution-4 in Scarsdale, New York.

ii. I have compared images of DELAHOZ on law enforcement databases with surveillance images of the person who deposited Check-5 (“Suspect-5”) and surveillance images of Suspect-5 at other branches of Financial Institution-4 on the same day. I believe that DELAHOZ and Suspect-5 are the same person, including because DELAHOZ has the same physical appearance and facial features as Suspect-5. Below is an image of DELAHOZ from law enforcement databases dated on or about May 22, 2019 (left) and surveillance images of Suspect-5 from the branch where Check-5 was deposited (right) and another branch of Financial Institution-4 on the same day (bottom). As is shown below, Suspect-5 appears to have the same distinctive neck tattoo as is depicted in the May 22, 2019 law enforcement photograph of DELAHOZ.



d. Additionally, on several occasions between on or about February 28, 2024 and on or about March 27, 2024, law enforcement officers observed PENA and the other defendants⁵ travel to various banks as a group. As described below, in several instances, one of the defendants would go into the bank, deposit a check, and then leave the bank several minutes later. At approximately the same time, receipts of check deposits from those same banks were posted to White House VibeZ and/or on PENA’s Messaging Platform-1 account – @THEREALRICH4EVER.⁶ For example:

i. On or about February 28, 2024, law enforcement officers, who were conducting surveillance, observed PENA driving a Black Dodge Durango with a particular New

⁵ Law enforcement officers were able to identify the defendants based on comparing the individuals they saw at the banks to photographs of the defendants maintained in law enforcement databases.

⁶ Based on my training and experience, I know that Messaging Platform-1 users can post images on their account profiles.

York license plate (the “Durango”). Based on vehicle registration records, the Durango is registered to PENA. The officers followed PENA and, at approximately 11:10 A.M., observed PENA pull over on West 231st Street in the Bronx, New York. GUTIERREZ exited the vehicle and crossed Broadway towards a branch of Financial Institution-2. Minutes later, GUTIERREZ returned to PENA’s vehicle. At approximately 11:25 A.M., @THEREALRICH4EVER posted two images of check deposit receipts from Financial Institution-2 that reflected a date of on or about February 28, 2024, and times of approximately 11:12 A.M. and 11:13 A.M.

ii. On or about March 6, 2024, law enforcement officers, who were conducting surveillance, observed PENA driving the Durango. GUTIERREZ, DELAHOZ, and DORSEY were also in the vehicle. At approximately 9:55 A.M., officers observed PENA stop on a street adjacent to a branch of Financial Institution-4 located in Elizabeth, New Jersey. GUTIERREZ exited the vehicle and entered the branch. At approximately 10:01 A.M., GUTIERREZ left the branch and returned to the Durango. At approximately the same time, a receipt for an approximately \$2,000 check deposit with Financial Institution-4 was posted on White House VibeZ. The receipt that was posted reflected a date of on or about March 6, 2024 and a time of approximately 9:58 A.M.

iii. Based on records from Financial Institution-4, I have learned that the deposited check was fraudulent. Below is a surveillance image of GUTIERREZ depositing the approximately \$2,000 check on or about March 6, 2024 at Financial Institution-4.



iv. On or about March 6, 2024, law enforcement continued to follow the Durango and, at approximately 10:14 A.M., PENA stopped at a branch of Financial Institution-2 in Roselle, New Jersey. DELAHOZ exited the vehicle and entered the branch. At approximately 10:16 A.M., DORSEY exited the Durango and also entered the branch. DORSEY left the branch at approximately 10:22 A.M. and DELAHOZ left the branch at approximately 10:31 A.M. At approximately the same time, @THEREALRICH4EVER posted an image of a check deposit receipt from Financial Institution-2 that reflected a date of on or about March 6, 2024, and a time of approximately 10:21 A.M.

v. On the same date, on or about March 6, 2024, law enforcement continued to follow the Durango and, at approximately 10:41 A.M., PENA stopped at a branch of another financial institution (“Financial Institution-5”) in Cranford, New Jersey. DORSEY and GUTIERREZ exited the vehicle and entered the branch. DORSEY went to a teller and

GUTIERREZ approached an ATM. GUTIERREZ left the branch at approximately 10:46 A.M. and DORSEY left the branch at approximately 10:51 A.M. At approximately the same time, @THEREALRICH4EVER posted an image of an approximately \$7,000 check deposit receipt from Financial Institution-5 that reflected a date of on or about March 6, 2024, and a time of approximately 10:48 A.M. Below is a surveillance image of DORSEY depositing the approximately \$7,000 check on or about March 6, 2024 at Financial Institution-5.



The Victims

11. Based on my participation in this investigation, my review of documents and records, and my communications with other Postal Inspectors from USPIS and other law enforcement personnel, I have learned, in substance and in part, the following:

a. As described above in paragraph 7, from in or about April 23, 2023 to in or about October 17, 2024, checks from numerous victims totaling over approximately \$53 million were posted on White House VibeZ. These victims are from states across the country, including, among others, New York, New Jersey, Pennsylvania, Maryland, Florida, and Texas.

b. On numerous occasions, checks that were mailed by victims in one state were stolen and subsequently negotiated—that is, deposited, or attempted to be deposited—in other states. For example, an approximately \$79,460.67 check dated on or about June 6, 2023 was sent by a victim-payor in Mineola, New York to the intended payee in Chicago, Illinois. That check instead was ultimately negotiated on or about June 21, 2023 in Tallulah, Louisiana under the name of a different payee.

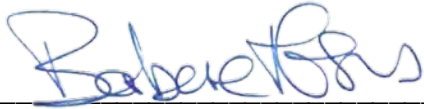
c. Law enforcement spoke with at least ten victims, all based in New York, New York, who each stated, in sum and substance, that they sent their checks by USPS mail, that those checks did not reach their intended recipients, and that the victims did not give permission or authority for their checks to be possessed or negotiated by anyone other than themselves or the people that they originally listed as the payees of the checks.

WHEREFORE, I respectfully request that MICHEAL PENA, HARRINGTON DELAHOZ, JOSHUA GUTIERREZ, and JAYSEN DORSEY, the defendants, be imprisoned or bailed, as the case may be.

s/ Erin T. Carmody by the Court with permission

ERIN T. CARMODY
Postal Inspector
U.S. Postal Inspection Service

Sworn to me through the transmission of
this Affidavit by reliable electronic
means (telephone), this 28 day of April, 2025.

A handwritten signature in blue ink, appearing to read "Barbara Moses", is written over a horizontal line.

HONORABLE BARBARA MOSES
United States Magistrate Judge
Southern District of New York