

Approved:

  
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JACKIE DELLIGATTI  
Assistant United States Attorney

Before:

THE HONORABLE VALERIE FIGUEREDO  
United States Magistrate Judge  
Southern District of New York

**23 MAG 1448**

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UNITED STATES OF AMERICA : **SEALED COMPLAINT**  
- v. - : Violations of 18 U.S.C. §§ 371,  
RAMDEO BALLIRAM and : 2113(b)  
LEONARDO ORTIZ, : COUNTY OF OFFENSE:  
Defendants. : BRONX  
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SOUTHERN DISTRICT OF NEW YORK, ss.:

KENNETH HINES, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD"), and charges as follows:

**COUNT ONE**  
(Conspiracy to Commit Bank Theft)

1. From at least in or about March 2021 up to and including in or about January 2023, in the Southern District of New York and elsewhere, RAMDEO BALLIRAM and LEONARDO ORTIZ, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other, and with others known and unknown, to commit an offense against the United States, to wit, bank theft, in violation of Title 18, United States Code, Section 2113(b).

2. It was a part and an object of the conspiracy that RAMDEO BALLIRAM and LEONARDO ORTIZ, the defendants, and others known and unknown, would and did take and carry away, with intent to steal and purloin, money and things of value exceeding \$1,000 belonging to and in the care, custody, control, management and possession of a particular bank ("Bank-1"), a bank insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(b).

Overt Acts

3. In furtherance of the conspiracy and to effect the object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

- a. On or about April 5, 2021, RAMDEO BALLIRAM and LEONARDO ORTIZ, the defendants, stole approximately \$47,780 in United States currency from an Automated Teller Machine (“ATM”) that had been filled by Bank-1.
- b. On or about February 24, 2022, RAMDEO BALLIRAM and LEONARDO ORTIZ stole approximately \$9,900 in United States currency from an ATM that had been filled by Bank-1.
- c. On or about December 22, 2022, RAMDEO BALLIRAM and LEONARDO ORTIZ, the defendants, followed an armored car (“Bank Van-1”) that regularly refills ATMs in stores across the Bronx in order to ascertain which ATMs Bank Van-1 was set to refill that day.
- d. On or about December 29, 2022, RAMDEO BALLIRAM and LEONARDO ORTIZ, the defendants, followed Bank Van-1 in order to ascertain which ATMs Bank Van-1 was set to refill that day.

(Title 18, United States Code, Section 371.)

**COUNT TWO**  
(Bank Theft)

4. From at least in or about March 2021 through in or about January 2023, in the Southern District of New York and elsewhere, RAMDEO BALLIRAM and LEONARDO ORTIZ, the defendants, did take and carry away with intent to steal and purloin money and things of value exceeding \$1,000 belonging to and in the care, custody, control, management and possession of Bank-1, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(b), to wit, BALLIRAM and ORTIZ stole at least approximately \$1 million from ATMs belonging to Bank-1.

(Title 18, United States Code, Section 2113(b).)

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

5. I am a Detective with the NYPD. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers, my examination of documents, videos, reports, and records, and my involvement in this investigation. 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 Burglary Pattern**

6. Since in or about March 2021, I have been investigating a pattern of ATM thefts from different commercial establishments throughout the Bronx, New York (the “Burglary Pattern”).

7. Based on this investigation, I and other law enforcement officers have identified at least twenty-three burglaries, which occurred from March 2021 through January 2023, as being part of the Burglary Pattern. In general, the Burglary Pattern consists of the following:

a. The burglaries generally occur at night or in the early morning, when the commercial establishments are closed and when no employees are present.

b. The burglars travel from Queens to the Bronx and break into a commercial establishment in the Bronx that contains an ATM they know to have recently been refilled.

c. In order to ascertain which ATMs have recently been refilled with cash, the burglars follow an armored car, Bank Van-1, that regularly refills ATMs in stores across the Bronx on behalf of Bank-1, a particular FDIC-insured bank headquartered in Wilmington, Delaware.

d. Specifically, on the days on which the burglars suspect that ATMs will be refilled, the burglars typically follow Bank Van-1 from its depot in Queens, across the Throgs Neck Bridge, so they can observe where an ATM was refilled. Later that same night, early the next morning, or sometimes a few days later, the burglars return to the stores with recently refilled ATMs to steal the money.

e. After breaking into the stores, the burglars force open the ATM and steal all the money inside. The burglars appear to often spend close to several hours at each burglary site while attempting to pry open each ATM using sophisticated tools. On certain occasions where the burglars are unable to open the ATM and remove its contents, they have stolen the entire ATM.

f. The burglars often also steal money from the cash register, as well as other goods from the store, such as cigarettes, alcohol, lottery tickets, or digital video recording (“DVR”) systems.

g. After the burglary is completed, the burglars typically travel back to Queens via the Bronx-Whitestone Bridge using one of two cars (“Car-1” and “Car-2”). The burglars have occasionally deviated from this travel pattern by entering or leaving the Bronx in a different way, and not via the Bronx-Whitestone Bridge, and by occasionally using a different car (“Dodge Van-1” and “Dodge Van-2”).

h. One of the burglars (“Burglar-1”) is a tall, heavyset male often wearing a black or grey hooded sweatshirt, dark pants, and a flat brim hat. During each of the burglaries, Burglar-1 appears to enter each commercial establishment in order to steal the cash from the ATM.

i. One of the burglars (“CC-1”) is another heavy-set male also often wearing a black or grey hooded sweatshirt and dark pants. CC-1 also appears to enter each commercial establishment during each of the burglaries in order to assist Burglar-1 with stealing the cash from

the ATM.

j. Another burglar (“Burglar-2”) appears to primarily act as the driver or lookout, and remains in the car for the duration of each burglary.

k. For almost all of the burglaries, either Car-1 or Car-2 entered the Bronx from Queens via the Bronx-bound lane of the Bronx-Whitestone Bridge shortly before the burglary, and then, shortly after the burglary, is recorded leaving the Bronx via the Queens-bound lane of the Bronx-Whitestone Bridge.

8. As described in Paragraphs 35-44 below, Burglar-1 has been identified as RAMDEO BALLIRAM, the defendant, and Burglar-2 has been identified as LEONARDO ORTIZ, the defendant.

#### **The March 3, 2021 Burglary**

9. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 10:30 p.m. on or about March 3, 2021, in the vicinity of East 167<sup>th</sup> Street in the Bronx, New York (the “March 3 Burglary”). Specifically:

- a. On or about March 3, 2021, at approximately 10:30 p.m., at least two burglars, whom I believe to be Burglar-1 and CC-1, entered the premises of a Chinese restaurant in the vicinity of East 167<sup>th</sup> Street in the Bronx, New York (“Store-1”).
- b. Still images of Burglar-1 and CC-1, as captured by nearby surveillance cameras, are copied below:



c. The burglars stole approximately \$61,045 from the ATM and \$1,080 from the cash register.

d. Two of the burglars fled the scene in a tan Dodge van with New York license plate HBN-8557 (“Dodge Van-1”).

e. Dodge Van-1 was captured on surveillance video in the vicinity of the March 3 Burglary. A still image from that surveillance video is copied below:



10. I have reviewed a law enforcement database for license plate readers (the “LPR database”) containing information relating to the location of Dodge Van-1 on March 4, 2021. Based on that review, I have learned, among other things, that, on or about March 4, 2021, at approximately 4:11 a.m. (that is, early the following morning), Dodge Van-1 traveled to Queens from the Bronx via the Bronx-Whitestone Bridge.

#### **The April 5, 2021 Burglary**

11. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 1:47 a.m. on or about April 5, 2021, in the vicinity of Boston Road in the Bronx, New York (the “April 5 Burglary”). Specifically:

a. On or about April 5, 2021, at approximately 1:47 a.m., Burglar-1 and CC-1 entered the premises of a particular restaurant in the vicinity of Boston Road in the Bronx, New

York (“Store-2”).

b. Still images of Burglar-1 and CC-1, as captured by nearby surveillance cameras, are copied below:



c. The burglars stole approximately \$47,780 from the ATM in Store-2, as well as approximately \$900 in from the cash register, before fleeing in what I believe to be Car-1, a black Chevrolet Tahoe with New York license plate JDA-8231.

d. Car-1 was captured on surveillance video near the site of the April 5 burglary. A still image from that surveillance footage is copied below:



12. Based on my review of the LPR database, I have learned, among other things, that:

- a. Car-1 entered the Bronx via the Bronx-Whitestone Bridge at approximately 10:37 p.m. on or about April 4, 2021.
- b. Car-1 returned to Queens via the Bronx-Whitestone Bridge at approximately 4:54 a.m. on or about April 5, 2021.

#### **The April 14, 2021 Burglary**

13. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at some time between midnight and 7:00 a.m. on or about April 14, 2021 in the vicinity of Prospect Avenue in the Bronx, New York (the “April 14 Burglary”). Specifically:

- a. On or about April 14, 2021, at some time between midnight and 7:00 a.m., burglars entered the premises of a particular convenience store in the vicinity of Prospect Avenue in the Bronx, New York (“Store-3”).
- b. The burglars stole approximately \$15,200 from the ATM in Store-3, as well as approximately \$400 from the cash register and \$1,400 in prepaid calling cards, before fleeing in Car-1.

14. Based on my review of the LPR Database, I have learned, among other things, that:

- a. Car-1 entered the Bronx via the Bronx-Whitestone Bridge at approximately 10:55 p.m. on or about April 13, 2021.
- b. Car-1 returned to Queens via the Bronx-Whitestone Bridge at approximately 2:14

a.m. on or about April 14, 2021.

**The April 22, 2021 Burglary**

15. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at some time between midnight and 7:00 a.m. on or about April 22, 2021 in the vicinity of East 169<sup>th</sup> Street in the Bronx, New York (the “April 22 Burglary”). Specifically:

a. On or about April 22, 2021, at some time between midnight and 7:00 a.m., Burglar-1 and CC-1 entered the premises of a particular convenience store in the vicinity of East 169<sup>th</sup> Street in the Bronx, New York (“Store-4”).

b. Still images of Burglar-1, and CC-1, as captured by nearby surveillance cameras, are copied below:



c. After they appeared unable to break into the ATM, the burglars stole the entire ATM and loaded it into a different Dodge van with New York license plate EXT-1351 (“Dodge Van-2”).



d. A black Chevrolet Tahoe—what I believe to be Car-1—was also present at the scene of the April 22 burglary:



e. The ATM the burglars stole from Store-4 contained approximately \$32,140. The burglars also stole approximately \$900 from the cash register, as well as a camera system worth approximately \$2,000, before fleeing in Dodge Van-2 and Car-1.

16. Based on my review of the LPR database, as well as my conversations with other law enforcement officers, I have learned, among other things, that:

a. Car-1 entered the Bronx via the Bronx-Whitestone Bridge at approximately 10:19 p.m. on or about April 21, 2021.

b. Car-1 returned to Queens via the Bronx-Whitestone Bridge at approximately 3:57 a.m. on or about April 22, 2021.

c. Dodge Van-2 also returned to Queens via the Bronx-Whitestone Bridge at approximately 3:57 a.m. on or about April 22, 2021, that is, at the same time as Car-1.

d. Dodge Van-2 was reported stolen by its owner on or about April 23, 2021. The owner had last seen Dodge Van-2 on or about April 21, 2021. On or about April 30, 2021, Dodge Van-2 was recovered in Queens. An empty ATM was found inside.

#### **The November 19, 2021 Burglary**

17. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 1:30 a.m. on or about November 19, 2021 in the vicinity of East 180<sup>th</sup> Street in the Bronx, New York (the “November 19 Burglary”). Specifically:

a. On or about November 19, 2021, at approximately 1:30 a.m., Burglar-1 and CC-1 entered the premises of a particular convenience store in the vicinity of East 180<sup>th</sup> Street in the Bronx, New York (“Store-5”).

b. Still images of Burglar-1 and CC-1, as captured by nearby surveillance cameras, are copied below. In this image, the burglars are walking in front of what I believe to be Car-2, a black Cadillac Escalade with New York license plate KSX-7599:



c. The burglars stole approximately \$65,060 from the ATM in Store-5, as well as approximately \$600 worth of miscellaneous items, before fleeing in Car-2.

18. Based on my review of the LPR database, I have learned, among other things, that:

a. Car-2 entered the Bronx via the Bronx-Whitestone Bridge at approximately 10:11 p.m. on or about November 18, 2021.

b. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 2:07 a.m. on or about November 19, 2021.

### **The December 9, 2021 Burglary**

19. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at some time between 10:00 p.m. on or about December 9, 2022 and 7:00 a.m. on or about December 10, 2022, in the vicinity of Woodmansten Place in the Bronx, New York (the “December 9 Burglary”). Specifically:

a. Between on or about December 9, 2021, at approximately 10:00 p.m., and on or about December 10, 2022, at approximately 7:00 a.m., the burglars entered the premises of a particular convenience store in the vicinity of Woodmansten Place in the Bronx, New York (“Store-6”).

b. The burglars stole approximately \$29,560 from the ATM in Store-6, as well as a DVR system and a Playstation 4 gaming console, before fleeing in Car-2.

20. Based on my review of the LPR database, I have learned, among other things, that:

a. Car-2 entered the Bronx via the Bronx-Whitestone Bridge at approximately 9:37 p.m. on or about December 9, 2021.

b. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 12:26 a.m. on or about December 10, 2021.

c. Car-2 re-entered the Bronx via the Bronx-Whitestone Bridge at approximately 1:11 a.m. on or about December 10, 2021.

d. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 2:03 a.m. on December 10, 2021.

e. On or about December 9, 2021, that is, the day of Burglary-2, Bank Van-1 entered the Bronx via the Throgs Neck Bridge at approximately 10:04:51 a.m.

f. Car-2 entered the Bronx via the Throgs Neck Bridge just seconds later, at approximately 10:05:08 a.m.

### **The February 24, 2022 Burglary**

21. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 12:50 a.m. on or about February 24, 2022, in the vicinity of Bronxdale Avenue in the Bronx, New York (the “February 24 Burglary”). Specifically:

a. On or about February 24, 2022, at approximately 12:50 a.m., the burglars entered the premises of a particular laundromat in the vicinity of Bronxdale Avenue in the Bronx, New York (“Store-7”).

b. A still image of one of the burglars using what appears to be an electric saw to cut the lock on the door of Store-7, as captured by nearby surveillance cameras, is copied below, where one can see fire in the middle lefthand portion of the image:



c. The burglars stole approximately \$9,900 from the ATM in Store-7, as well as \$170 from the cash register and a DVR system, before fleeing in Car-2.

22. Based on my review of the LPR database, I have learned, among other things, that:

a. Car-2 entered the Bronx via the Bronx-Whitestone Bridge at approximately 10:30 p.m. on or about February 23, 2022.

b. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 2:31 a.m. on or about February 24, 2022.

c. On or about February 23, 2022, that is, the day before the February 24 Burglary, Bank Van-1 entered the Bronx via the Throgs Neck Bridge at approximately 10:11:45 a.m.

d. Car-2 entered the Bronx via the Throgs Neck Bridge just seconds later, at approximately 10:11:58 a.m.

#### **The March 12, 2022 Burglary**

23. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 3:20 a.m. on or about March 12, 2022, in the vicinity of Boston Road in the Bronx, New York (the “March 12 Burglary”). Specifically:

a. On or about March 12, 2022, at approximately 3:20 a.m., Burglar-1 and CC-1 entered the premises of a particular convenience store the vicinity of Boston Road in the Bronx, New York. (“Store-8”).

b. Still images of Burglar-1, and CC-1, as captured by Store-8’s surveillance cameras, are copied below.





c. The burglars stole approximately \$77,160 from the ATM in Store-8 before fleeing in Car-2.

d. A still image of one of the burglars entering what I believe to be Car-2, as captured by nearby surveillance footage, is copied below:



24. Based on my review of the LPR database, I have learned, among other things, that:

a. Car-2 entered the Bronx via the Bronx-Whitestone Bridge at approximately 12:04 a.m. on or about March 12, 2022.

b. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 4:12 a.m. on or about March 12, 2022.

c. On or about March 10, 2022, that is, two days before the March 12 Burglary, Bank Van-1 entered the Bronx via the Throgs Neck Bridge at approximately 10:32:39 a.m.

d. Car-2 entered the Bronx via the Throgs Neck Bridge just seconds later, at approximately 10:32:48 a.m.

#### **The March 24, 2022 Burglary**

25. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 12:57 a.m. on or about March 24, 2022, in the vicinity of Rosedale Avenue in the Bronx, New York (the “March 24 Burglary”). Specifically:

a. On or about March 24, 2022, at approximately 12:57 a.m., the burglars entered the premises of a particular convenience store the vicinity of Rosedale Avenue in the Bronx, New York (“Store-9”).

b. After they appeared unable to break into the ATM, the burglars stole the entire ATM and loaded it into Car-2:



c. The ATM the burglars stole from Store-9 contained approximately \$21,570. The burglars also stole \$3,100 from the register and a DVR system before fleeing in Car-2.

26. Based on my review of the LPR database, I have learned, among other things, that:

- a. Car-2 entered the Bronx via the Bronx-Whitestone Bridge at approximately 12:34 a.m. on or about March 24, 2022.
- b. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 5:06 a.m. on or about March 24, 2022.

#### **The July 22, 2022 Burglary**

27. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 2:58 a.m. on or about July 22, 2022, in the vicinity of East Avenue in the Bronx, New York (the “July 22 Burglary”). Specifically:

- a. On or about July 22, 2022, at approximately 2:58 a.m., Burglar-1 and CC-1 entered the premises of a particular convenience store the vicinity of East Avenue in the Bronx, New York (“Store-10”).
- b. Still images of one of the burglars breaking into Store-10, as captured by nearby surveillance cameras, are copied below.



- c. The burglars stole approximately \$48,870 from the ATM in Store-10, as well as \$600 in cash from the register, \$480 in cigarettes, and \$9,500 in lottery tickets, before fleeing in Car-2.

28. Based on my review of the LPR database, I have learned, among other things, that:

- a. Car-2 entered the Bronx via the Bronx-Whitestone Bridge at approximately 10:51 p.m. on or about July 21, 2022.

b. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 5:14 a.m. on or about July 22, 2022.

c. On or about July 21, 2022, that is, the day before the July 22 Burglary, Bank Van-1 entered the Bronx via the Throgs Neck Bridge at approximately 09:56:59 a.m.

d. Car-2 entered the Bronx via the Throgs Neck Bridge just seconds later, at approximately 09:57:09 a.m.

#### **The December 23, 2022 Burglary**

29. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 2:30 a.m. on or about December 23, 2022, in the vicinity of White Plains Road in the Bronx, New York (the “December 23 Burglary”). Specifically:

a. On or about December 23, 2022, at approximately 2:30 a.m., the burglars entered the premises of a convenience store in the vicinity of White Plains Road in the Bronx, New York (“Store-11”).

b. Burglar-1 had also been in Store-11 earlier in the day on or about December 23, 2022. Still images of Burglar-1 in and outside Store-11 earlier in the day, as captured by Store-11’s surveillance camera and a nearby surveillance camera, are copied below:



c. Still images of Burglar-1 and CC-1 at or about the time of the December 23

burglary, as captured by a nearby surveillance camera, are copied below.



d. The burglars stole approximately \$15,740 from the ATM in Store-11, as well as \$2,400 in cash from the register, before fleeing in Car-2.

30. Based on my review of the LPR database, I have learned, among other things, that:

a. Car-2 entered the Bronx via the Bronx-Whitestone Bridge at approximately 10:41 p.m. on or about December 22, 2022.

b. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 4:49 a.m. on or about December 23, 2022.

c. On or about December 22, 2022, that is, the day before the December 23 Burglary, Bank Van-1 entered the Bronx via the Throgs Neck Bridge at approximately 9:41:20 a.m.

d. Car-2 entered the Bronx via the Throgs Neck Bridge just seconds later, at approximately 9:41:28 a.m.

#### **The December 31, 2022 Burglary**

31. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at some time between midnight and 7:00 a.m. on or about December 31, 2022, in the vicinity of Burke Avenue in the Bronx, New York (the "December 31 Burglary"). Specifically:

a. On or about December 31, 2022, at some time between midnight and 7:00 a.m., the burglars entered the premises of a particular convenience store in the vicinity of Burke Avenue in the Bronx, New York (“Store-12”).

b. The burglars stole approximately \$39,990 from the ATM in Store-12, as well as \$3,500 in cash from the register, \$1,160 worth of cigarettes, and 2 cases of beer, before fleeing in Car-2.

32. Based on my review of the LPR database, I have learned, among other things, that:

a. Car-2 entered the Bronx via the Bronx-Whitestone Bridge at approximately 9:55 p.m. on or about December 30, 2022.

b. Car-2 returned to Queens via the Bronx-Whitestone Bridge at approximately 5:09 a.m. on or about December 31, 2022.

c. On or about December 29, 2022, that is, two days before the December 31 Burglary, Bank Van-1 entered the Bronx via the Throgs Neck Bridge at approximately 09:41:32 a.m.

d. Car-2 entered the Bronx via the Throgs Neck Bridge just seconds later, at approximately 9:41:54 a.m.

### **The January 5, 2023 Burglary**

33. Based on my conversations with law enforcement officers and my review of law enforcement reports, photographs, and surveillance video, I have learned that one of the burglaries in the Burglary Pattern occurred at approximately 3:00 a.m. on or about January 5, 2023, in the vicinity of White Plains Road in the Bronx, New York (the “January 5 Burglary”). Specifically:

a. On or about January 5, 2023, at approximately 3:00 a.m., Burglar-1 and CC-1 entered the premises of a particular convenience store the vicinity of Burke Avenue in the Bronx, New York (“Store-13”).

b. Still images of Burglar-1 and CC-1, as captured by nearby surveillance cameras, are copied below.



c. The burglars stole approximately \$92,770 from two ATMS in Store-13, as well as \$400 in cash from the register and a DVR system, before fleeing in Car-2.

34. Based on my review of the LPR database, I have learned, among other things, that:

a. Car-2 entered the Bronx via the Robert F. Kennedy Bridge at approximately 12:52 a.m. on or about January 5, 2023.

#### **Identification of Burglar-1 and Burglar-2**

35. Based on my review of surveillance video, law enforcement reports and records, other relevant reports and records, the LPR database, my conversations with other law enforcement officers, and my own personal investigation, I believe that Burglar-1 is RAMDEO BALLIRAM, the defendant, and Burglar-2 is LEONARDO ORTIZ, the defendant. Specifically:

36. Based on my review of Department of Motor Vehicle Records, law enforcement reports and records, and my own personal investigation, I have learned, among other things, that Car-1 is registered to a certain individual (“Individual-1”).

37. Based on my review of records provided to me by T-Mobile, I know that RAMDEO BALLIRAM, the defendant, communicated with Individual-1 at or around the time of each of the burglaries for which Car-1 was used. Specifically:

a. On the day of the March 3 Burglary, RAMDEO BALLIRAM, the defendant, communicated with Individual-1 approximately 22 times.

b. On the day of the April 5 Burglary, RAMDEO BALLIRAM, the defendant, communicated with Individual-1 approximately 13 times.

c. On the date of the April 22 Burglary, RAMDEO BALLIRAM, the defendant, communicated with Individual-1 approximately 9 times.

38. Based on my review of Department of Motor Vehicle Records, law enforcement reports and records, and my own personal investigation, I have learned, among other things, that Car-2 is registered to a certain individual (“Individual-2”).

39. Based on my review of law enforcement reports and records, as well as my own personal investigation, I know that, although Individual-2 owns Car-2, RAMDEO BALLIRAM, the defendant, claims custody and control over Car-2. Specifically:

a. BALLIRAM was driving Car-2 during a March 25, 2022 law enforcement stop of Car-2 in front of BALLIRAM’s known place of residence.

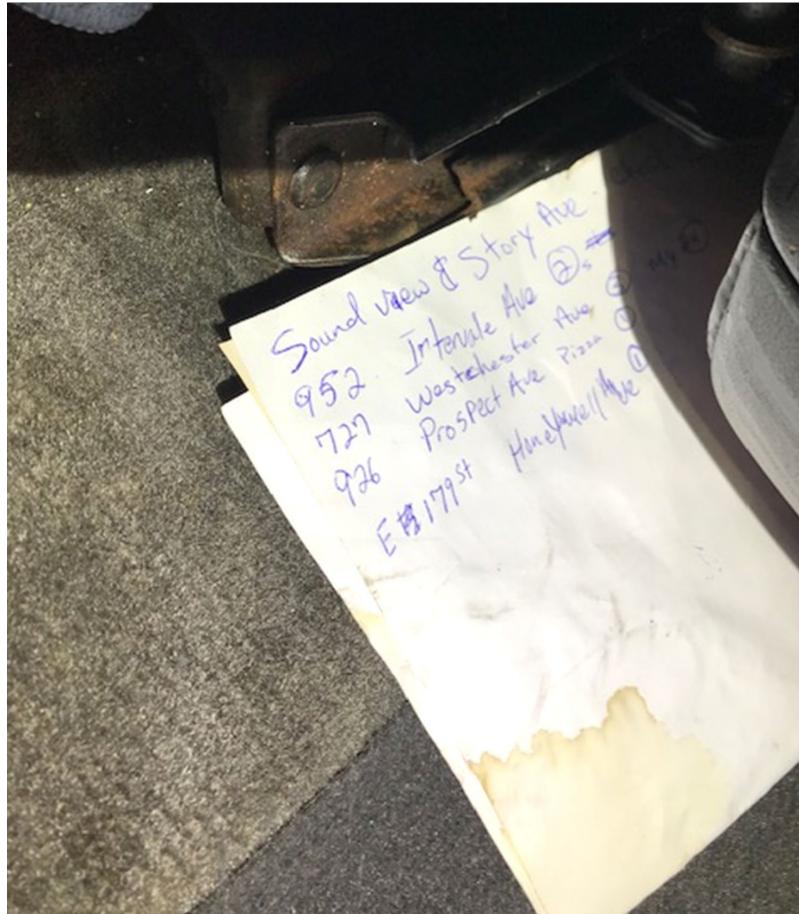
b. BALLIRAM was also in the front passenger seat of Car-2 when I performed a routine law enforcement stop of Car-2 on April 15, 2022 (“Car Stop-1”).

c. During both stops, BALLIRAM claimed custody and control over Car-2 and stated to law enforcement agents that Car-2 was in fact registered to his cousin.

d. I have also personally observed Car-2 parked approximately one half of a block from BALLIRAM’s known place of residence in the middle of the night.

40. I conducted Car Stop-1 on or about April 15, 2022, at approximately 04:00 a.m. in Queens, NY. Based on my review of identification documents provided by the individuals in Car-2, as well as my comparison of photographs taken of the individuals on the evening of Car Stop-1 with past law enforcement photographs, I know that RAMDEO BALLIRAM and LEONARDO ORTIZ, the defendants, and CC-1 were all traveling in Car-2 during Car Stop-1. No other individuals were traveling in Car-2 at that time.

41. In the course of securing Car-2 incident to Car Stop-1, I observed on the floor of the front passenger seat what I believe to be a handwritten list (the “List”) of ATM locations that were recently refilled by Bank Van-1. Each listed ATM location also included a circled number to the right of the text. Based on my investigation, I believe that the circled number indicates the number of cash cassettes with which each ATM had been recently filled. A photograph I took of the List is copied below:



42. I have also compared photographs I took of RAMDEO BALLIRAM, the defendant, on the night of Car Stop-1 with surveillance footage from some of the burglaries. For example:

a. Below is a photograph of RAMDEO BALLIRAM, the defendant ("Photo-1"), that I took on the night of Car Stop-1:



b. Below is a still image from surveillance video (“Photo 2”) captured from the commercial establishment that was burglarized during the March 12 Burglary:



c. Below is a still image from surveillance video (“Photo 3”) that was captured from the commercial establishment next door to BALLIRAM’s residence at approximately 6:00 a.m., shortly after the March 12 burglary:



d. In addition, below is another still image (“Photo 4”) from surveillance video captured from the commercial establishment next to BALLIRAM’s residence at approximately 6:00 a.m., shortly after the March 12 burglary, in which BALLIRAM is seen exiting from a black Cadillac Escalade that I believe to be Car-2:



e. Based on my comparison of Photos 2, 3, and 4—particularly the fact that the individual is wearing the same clothing—I believe that these are pictures of the same individual. Further, based on my comparison of Photos 1, 2, 3, and 4—particularly the individual’s clothing and flat brim hat, and the fact that the individual in Photo 4 appears to be exiting from Car-2, which is parked in front of BALLIRAM’s known place of residence, I believe that all three pictures are of the same individual, RAMDEO BALLIRAM, the defendant.

f. Based on my review of surveillance footage from other burglaries, I have observed that the same individual—RAMDEO BALLIRAM, the defendant—is present for several of the other burglaries and is wearing the same or substantially similar clothing, that is, dark black pants, a flat brim hat, and a hooded sweatshirt, for each burglary.

43. Based on my participation in the investigation, and on the fact that LEONARDO ORTIZ, the defendant, is generally not seen on surveillance footage during the burglaries, I believe that he acts as Burglar-2, that is, the driver or lookout. For example, ORTIZ was driving Car-2 during Car Stop-1.

44. Furthermore, based on my review of records from cellphone service providers, I have learned, among other things, the following:

a. RAMDEO BALLIRAM, the defendant, is the subscriber of a cellphone assigned a certain call number (“Cellphone-1”).

b. LEONARDO ORTIZ, the defendant, is the subscriber of a cellphone assigned a certain call number (“Cellphone-2”).

c. The location of Cellphone-1, that is, the cellphone belonging to RAMDEO BALLIRAM, the defendant, on the dates and times of the April 5, April 22, November 19, December 9, February 24, March 12, March 24, July 22, December 23, December 31, and January 5 burglaries, is consistent with RAMDEO BALLIRAM’s involvement in those burglaries. Specifically:

i. At approximately 11:16 p.m. on or about April 4, 2021, that is, at or around the time of the April 5 Burglary, Cellphone-1 was located in the vicinity of Store-2.

ii. At approximately 11:40 p.m. on or about April 21, 2021, that is, at or around the time of the April 22 Burglary, Cellphone-1 was located in the vicinity of Store-4.

iii. At approximately 11:16 p.m. on or about November 18, 2021, that is, at or around the time of the November 19 Burglary, Cellphone-1 was located in the vicinity of Store-5.

iv. At approximately 11:47 p.m. on or about December 9, 2021 and at approximately 3:08 a.m. on or about December 10, 2021, that is, at or around the time of the December 9 Burglary, Cellphone-1 was located in the vicinity of Store-6.

v. At approximately 9:09 p.m. on or about February 23, 2022, that is, at or around the time of the February 24 Burglary, Cellphone-1 was located in the vicinity of Store-7. Cellphone-1 returned to the vicinity of Store-7 at 11:22 p.m. on the same day.

vi. On or about March 12, 2022, from approximately 1:44 a.m. until 3:01 a.m., that is, at or around the time of the March 12 Burglary, Cellphone-1 was located in the vicinity of Store-8.

vii. On or about March 24, 2022, at approximately 2:45 a.m., that is, at or around the time of the March 24 Burglary, Cellphone-1 was located in the vicinity of Store-9.

viii. On or about July 22, 2022, at approximately 5:08 a.m., that is, at or around the time of the July 22 Burglary, Cellphone-1 was located in the vicinity of Store-10.

ix. On or about December 23, 2022, at approximately 12:00 a.m., that is, at or around the time of the December 23 Burglary, Cellphone-1 was located in the vicinity of Store-11.

x. From approximately 10:15 p.m. on or about December 30, 2022, until approximately 4:45 a.m. on or about December 31, 2022, that is, at or around the time of the December 31 Burglary, Cellphone-1 was located in the vicinity of Store-12.

xi. On or about January 5, 2023, from approximately 1:15 a.m. until approximately 4:00 a.m., that is, at or around the time of the January 5 Burglary, Cellphone-1 was located in the vicinity of Store-13.

d. The location of Cellphone-2, that is, the cellphone of LEONARDO ORTIZ, the

defendant, on the dates and times of the March 3, April 5, April 14, April 22, December 9, February 24, and January 5 burglaries is consistent with LEONARDO ORTIZ's involvement in those burglaries. Specifically:

i. From approximately 11:00 p.m. on or about March 3, 2021, until approximately 12:09 a.m. on or about March 4, 2021, that is, at or around the time of the March 3 Burglary, Cellphone-2 was located in the vicinity of Store-1.

ii. From approximately 11:21 p.m. on or about or about April 4, 2021, until approximately 4:39 a.m. on or about April 5, 2021, that is, at or around the time of the April 5 Burglary, Cellphone-2 was located in the vicinity of Store-2.

iii. From approximately 11:02 p.m. on or about April 13, 2021, until approximately 2:11 a.m. on or about April 14, 2021, that is, at or around the time of the April 14 Burglary, Cellphone-2 was located in the vicinity of Store-3.

iv. From approximately 11:01 p.m. on or about April 21, 2021, until approximately 3:47 a.m. on or about April 22, 2021, that is, at or around the time of the April 22 Burglary, Cellphone-2 was located in the vicinity of Store-4.

v. At approximately 9:52 p.m. on or about December 9, 2021, that is, at or around the time of the December 9 Burglary, Cellphone-2 was located in the vicinity of Store-6.

vi. From approximately 9:01 p.m. until approximately 9:24 p.m. on or about February 23, 2022, that is, at or around the time of the February 24 Burglary, Cellphone-2 was located in the vicinity of Store-7. Cellphone-2 returned to the vicinity of Store-7 from approximately 10:36 p.m. on or about February 23, 2022, until approximately 1:04 a.m. on or about February 24, 2022, and from approximately 1:52 a.m. until approximately 2:27 a.m. on or about February 24, 2022.

vii. From approximately 4:08 a.m. until approximately 4:23 a.m. on or about January 5, 2023, that is, at or around the time of the January 5 Burglary, Cellphone-2 was located in the vicinity of Store-13.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of RAMDEO BALLIRAM and LEONARDO ORTIZ, the defendants, and that they be arrested and imprisoned or bailed, as the case may be.

Kenneth Hines (by VF with permission)  
KENNETH HINES  
Detective  
New York City Police Department

Sworn to me through the transmission of this  
Affidavit by reliable electronic means (telephone),  
this 23rd day of February, 2023

  
THE HONORABLE VALERIE FIGUEREDO  
United States Magistrate Judge  
Southern District of New York