

CONTINUATION OF COMPLAINT

Introduction

1. I, Christopher J. Rodolico, am a Special Agent of the Federal Bureau of Investigation (FBI), presently assigned to the Lansing Resident Agency, Detroit Field Division Office. I have served as an FBI Special Agent for the past six years. I have received specialized training in the investigation of Federal felonies including access-device fraud, bank fraud, identity theft, wire fraud, and various forms of computer crime, and have served as lead agent in many prosecutions of such offenses.
2. The following information is provided for the purpose of establishing probable cause to arrest Yunier Cudello-Albelo, Yaimari Gonzalez-Santos, Juan Ledesma and Elisabe Hernandez-Perez for the offenses of conspiracy to commit wire fraud, wire fraud, and access device fraud, in violation of 18 U.S.C. §§ 1349, 1343 and 1029.
3. The matters set forth in this affidavit are either known personally to me or were related to me by other persons acting in their official capacities as officers and agents of the United States, the State of Michigan, and local jurisdictions within Michigan. Because it is submitted for the limited purpose of establishing probable cause to arrest, this affidavit does not necessarily recite all of the facts of the underlying investigation that are known to me or to other investigators at this time.

PROBABLE CAUSE

General Background

4. During the summer of 2015, gas stations at locations throughout Michigan began to discover that their pumps had been broken into by unknown persons and that electronic devices had been installed that digitally recorded credit card account information from the magnetic strips of credit cards that customers used to pay for gas. The devices were designed and installed in a way that enabled them to record the account data without interfering with gas-purchase transactions, and because the devices were installed on the interior of the pumps, customers had no way of knowing that their account data had been recorded when they used their cards. Within days of using their cards to purchase gasoline, account holders would notice unauthorized charges being made against their credit accounts at retail outlets such as Meijer and Walmart, typically for the purchase of stored-value cards (SVCs) at self-checkout lanes. Loss-prevention officers at

the banks that held the accounts were then able to determine that the common thread running between the compromised accounts was that the account holders had all purchased gasoline at the same pumps at the same gas stations shortly before the unauthorized purchases were made.

5. I know from training and experience that it is possible to re-encode digitally stored account information onto the magnetic strip of any type of plastic access device using commercially available reader-scanner devices and the corresponding computer software that comes with the device. These devices and this software have legitimate commercial uses such as coding hotel room keys, creating security badges, etc.. They are also a common tool for perpetrators of fraud and identity theft, however, who use them to re-encode compromised credit account data onto access devices which they then use to make fraudulent purchases of high-ticket items and new SVC's at self-checkout lanes during buying trips to "big-box" retail stores such as Meijer.
6. The process of purchasing SVC's at retail stores involves the transmission of electronic communications over the Internet between the point of sale, the bank that holds the compromised account that is being charged for the transaction, and the bank that issued the SVC. These communications are transmitted in interstate commerce because the various banks are located in different states from each other and from the points of sale, and because communications sent over the Internet travel interstate based on the locations of the service providers.

Specific Information

7. Prior to 2 Sept. 2015, the Grand Rapids Police Department (GRPD) released a bulletin alerting officers to the possibility that a group of out-of-state Hispanics, possibly Cuban nationals, were engaged in installing skimmer devices on pumps at area gas stations, and then using the compromised account data to re-encode cards that were then used to purchase SVC's at area retailers.
8. On 2 Sept., GRPD detective Mason Klein received a call that a group of possible Cuban nationals was staying at a pair of hotels in Grandville and was traveling in a rental car. GRPD contacted one of the hotels, a Comfort Inn, and learned that a Yunier ALBELO had registered for a room using an SVC and that he was driving a rented Ford Fiesta. Officers commenced physical surveillance of the Fiesta, and then followed ALBELO when he drove to a Meijer in Holland. The officers saw ALBELO purchase SVC's using numerous different access devices, where he was joined by two other males and two females. One of these males, later identified as Yaimari SANTOS, left the store in a rented Kia Sportage with the woman later identified as Elisabe PEREZ, while ALBELO and the others left in the Fiesta.

9. GRPD officers followed the Fiesta as it drove from the Meijer parking lot to the adjacent Meijer gas station. There, ALBELO threw one or more bags into the trash. When recovered, these bags were found to contain Meijer receipts and eight SVC's that had be re-encoded. Officers lost sight of the Kia, but subsequently rediscovered the vehicle parked at the Comfort Inn. ALBELO was also present in the parking lot, urinating next to the Ford Fiesta.
10. GRPD officers arrested ALBELO. They also proceeded to the room that ALBELO had rented, Room 100, and found Yaimari SANTOS exiting the room with PEREZ. SANTOS and PEREZ, both of whom had participated in the purchasing of SVC's at Meijer, were also arrested. The officers then obtained a search warrant issued by a State of Michigan judge for the hotel room and both the Kia and the Ford. That search resulted in the discovery of a cache of SVC's, packaging for SVC's, and numerous re-encoded SVC's. Three keys were recovered from the Kia, and these were later determined to be keys to gas pumps. A cache of 34 SVC's was also recovered from SANTOS' person after his arrest.
11. Employees of the Comfort Inn informed GRPD officers that the persons staying in Room 100 were affiliated with persons staying in Room 204. Room 204 had been rented by a Juan LEDESMA who, like ALBELO, had been using SVC's to pay for all his expenses. Although officers knocked on the door to Room 204 at the same time they were encountering ALBELO, SANTOS and PEREZ, no one came to the door. The next day, officers conducting surveillance of the Comfort Inn observed LEDESMA exiting the hotel and arrested him. Two more gas-pump keys were retrieved from LEDESMA's person. Also on 3 September, employees of Comfort Inn turned over a stack of 30 additional SVC's that were found hidden in the sofa of Room 100 when it was being cleaned.
12. LEDESMA consented to the search of Room 204, where he had been staying at the Comfort Inn. That search resulted in discovery of another cache of SVC's, a thumb drive, a skimmer device of the kind that had been recovered from numerous compromised gas pumps, and a laptop computer. The cards and the skimmer device were hidden in a tissue box, and it was subsequently determined that LEDESMA's fingerprints were on the box.
13. During their arrests, it was determined that ALBELO, SANTOS, LEDESMA and PEREZ are all Cuban citizens who reside in or near Miami, FLA. It was also determined that LEDESMA was the subject of an active arrest warrant for fraud and identity theft issued by a Colorado jurisdiction.
14. Acting on subsequently developed investigative leads, I returned to the Comfort Inn with GRPD on 28 October 2015. In the hallway where ALBELO, SANTOS

and PEREZ had been sitting after they were arrested, I discovered another cache of SVC's that had been shoved down in between the wall and the floor molding. I also found additional SVC's and \$3200 in \$100 bills that had been hidden in a jar of protein powder that was in luggage that Comfort Inn employees had taken from Room 100 and kept in storage since September 2.

CONCLUSION

15. Based on the foregoing information, I submit that there is probable cause to believe that **Yunier Cudello-ALBELO**, **Yaimari Gonzalez-SANOTS**, **Juan LEDESMA** and **Elisabe Hernandez-PEREZ** committed violations of 18 U.S.C. §§ 1349, 1343 and 1029 [Conspiracy to Commit Wire Fraud; Wire Fraud, and Access Device Fraud] in the Western District of Michigan and elsewhere.

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Introduction

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2. The following information is provided for the purpose of establishing probable cause to arrest Juan Estrada-Galvez, Manuel Perez-Cabrera, Michel Velazquez-Gregori, Raul Gonzalez Falcon, and Yunier Carballo-Pupo for the offenses of conspiracy to commit wire-fraud, wire fraud, and access device fraud, in violation of 18 U.S.C. §§ 1349, 1343 and 1029.
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Specific Information

7. On 24 August 2015, officers of the Grand Ledge Police Department responded to a call from the manager of a Shell gas station stating that a skimming device had been discovered inside one of the pumps at the station he managed. According to the manager, the pump had been checked at 6:00 pm and the security seal was found intact, and the seal was found broken when the pump was checked again at 8:00 pm.
8. Grand Ledge officers commenced surveillance of the pump that evening in order to see if anyone returned to retrieve the scanning device. Shortly before 10:00 pm, officers observed a white Acura pull into the station, and watched as two men, later identified as Raul Gonzalez FALCON, and Yunier Carballo-PUPO, pulled up to a second pump, and briefly opened the pump before closing it. FALCON and PUPO were arrested at the scene, and a pair of gas-pump keys was retrieved from PUPO's pocket. Officers used the key to open the second pump, and discovered the same kind of skimming device that had been recovered from the first pump earlier that evening. An employee of the gas

station who had been on duty throughout the period stated that both PUPO and FALCON had come into the gas-station store earlier that day.

9. Officers also seized a laptop computer from the backseat of the Acura, and two cellphones. Inspection of the exterior of one of these phones disclosed that it had been called repeatedly by two telephone numbers, both with a 512 area code. 512 is the area code for the region around Austin, TX. Investigators subsequently obtained search warrants for the phones and the laptop.
10. Prior to 2 Sept. 2015, the Grand Rapids Police Department (GRPD) released a bulletin alerting officers to the possibility that a group of out-of-state Hispanics, possibly Cuban nationals, were engaged in installing skimmer devices on pumps at area gas stations, and then using the compromised account data to re-encode cards that were then used to purchase SVC's at area retailers.
11. Shortly before Noon on 9 September 2015, officers of the Michigan State Police and the Wyoming Police Department initiated surveillance on two vehicles - a red Dodge carrying Florida plates and a black Audi carrying Texas plates - that were parked together at a Day's Inn in Grandville, MI. Not long after they commenced surveillance, officers observed five Hispanic males exit the hotel with luggage, get into the cars, and drive away together. It was decided to conduct a traffic stop of the Audi, and a marked MSP vehicle initiated the stop on eastbound I-196 west of Grand Rapids. As this was being done, the Dodge exited the freeway, and officers temporarily lost sight of it.
12. The driver of the vehicle, a Pedro Sanchez-Pupo, consented to a search, and the vehicle was released a short time later after the search produced no incriminating evidence. Meanwhile, officers had succeeded in re-locating the red Dodge, parked behind a gas station not far from the exit ramp it had taken off of I-196. The vehicle was unoccupied, and officers soon found the three men they had previously observed in the car inside the Subway sandwich shop adjacent to the gas station. Continuing their observation, officers watched the men return to the car, where one of them engaged in a conversation on his cellphone. Two of the men, later identified as GALVEZ and GREGORI, then knelt down briefly by the passenger-side front wheel-well before GALVEZ walked to the edge of the asphalt and threw something into the weeds. As GALVEZ was doing this, the man later identified as CABRERA walked to a garbage can next to the Subway and placed a cardboard box into the receptacle.
13. All three men were then contacted. The area where GALVEZ had thrown the object was searched, and a pair of black underwear wrapped around a cache of credit cards and a digital reader-writer device was discovered. Officers also examined the passenger-side front wheel-well, and discovered that an access

hatch had been cut into the plastic covering that allowed access to the factory void. It is common for subjects involved in illegal interstate activity to use vehicle factory voids to hide contraband and/or proceeds of crime. Finally, officers retrieved the object that CABRERA had placed in the garbage can, and saw that it was a box with part of a shipping label still attached to it. Although it had been partly removed, the tracking-number remnant on the box was complete enough to allow officers to check with a postal contact, and records disclosed that it had been sent from Texas addressed to Pedro Sanchez Pupo, the driver of the black Audi that officers had stopped. Officers also spoke with the desk clerk at the Day's Inn, who recounted that Pedro Pupo had received a package during his stay.

14. GALVEZ, CABRERA and GREGORI were arrested, and a cache of credit cards was found on each of their persons. Each of the three was found carrying re-encoded cards.
15. Subsequent examination of the cards that had been thrown into the weeds disclosed that they had been re-encoded with credit-card account data of other persons. One of these persons, a resident of Belmont, MI, told officers that the account had been closed due to fraud in mid-August after being used in Walgreens, Walmart, and Meijer stores. That person had also used his card to buy gas at a Citgo on 4 and 12 August, at the same pump where a skimming device was discovered on 20 August.
16. Officers obtained a state search warrant for the cellphones seized during the arrests of FALCON and PUPO on 24 August described in paragraph 8. Examination of the phone seized from FALCON disclosed that, on 24 July 2015, a text-message was sent to someone listed in the directory as "Michel" with a 512 area-code number. The message included a link to the Facebook page of the Super 8 hotel on 44th Street in Wyoming, MI. On 28 October, I retrieved records from the Super 8 showing that a group of persons that included "Jesus Gregori" stayed at the hotel from 24 July to 27 July 2015. GREGORI's full name is Michel Jesus Velazquez GREGORI.
17. Examination of FALCON's cellphone also disclosed image files of GREGORI and CABRERA as passengers in a vehicle. The phone also contains a significant number of saved search results for addresses to Walgreens and Walmart stores in Wisconsin, Michigan, Ohio and Texas.
18. Interviewed after their arrests, both FALCON and PUPO stated that they had been sent to Michigan from Austin, Texas by a Cuban known to them as [REDACTED] for the purpose of installing skimmers on gas-station pumps. PUPO stated that the cellphone he was using was given to him by

██████████, and that ██████████ had gotten the skimmers they were installing in the mail from Miami, Florida. PUPO also gave his address in Austin as ██████████ ██████████. This address is listed in public records as being affiliated with the brother of ██████████. This address is also associated with Manuel Perez-CABRERA, one of the three men arrested in Grand Rapids on 9 September.

CONCLUSION

19. Based on the foregoing information, I submit that there is probable cause to believe that **Juan Estrada-Galvez, Manuel Perez-Cabrera, Michel Velazquez-Gregori, Raul Gonzalez Falcon, and Yunier Carballo-Pupo** committed violations of 18 U.S.C. §§ 1349, 1343 and 1029 [Conspiracy to Commit Wire Fraud; Wire Fraud, and Access Device Fraud] in the Western District of Michigan and elsewhere.