

AUSA: Matthew Roth

Telephone: (313) 226-9186

AO 91 (Rev. 11/11) Criminal Complaint

Inspector:

Carla Menendez

Telephone: (313) 226-8235

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

7

United States of America

v.

Djuan Barnes

Case: 2:18-mj-30097

Assigned To: Unassigned

Assign Date: 2/15/2018

Description: CMP USA v. BARNES (SO)

CRIMINAL COMPLAINT

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

On or about the date(s) of October 2017 in the county of Wayne in the

Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1708
18 U.S.C. § 1028A
18 U.S.C. § 1029

Mail Theft
Aggravated Identity Theft
Access Device Fraud

This criminal complaint is based on these facts:

Continued on the attached sheet.

Complainant's signature

Inspector Carla J. Menendez, U.S. Postal Inspection Service

Printed name and title

Sworn to before me and signed in my presence.

Date: February 15, 2018

Judge's signature

City and state: Detroit, Michigan

Hon. Elizabeth A. Stafford, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Carla J. Menendez, after being duly sworn, do state the following:

1. I am a United States Postal Inspector, currently assigned to the Detroit Division Headquarters of the United States Postal Inspection Service ("Inspection Service"), and have been so employed since February 2006. I am currently assigned to the Mail Theft and External Crimes Team with the Inspection Service and also am a Task Force Officer (TFO) on the Detroit Metropolitan Identity Theft and Financial Crimes (DMIF) Task Force, led by the Federal Bureau of Investigation (FBI). My duties and responsibilities as a United States Postal Inspector and TFO include, but are not limited to, investigating violations of federal law, including 18 U.S.C. § 1708 (Mail Theft), 18 U.S.C. § 1028 (Identity Theft), 18 U.S.C. § 1028A (Aggravated Identity Theft) and 18 U.S.C. § 1029 (Access Device Fraud).

2. The information contained in this affidavit is based on my training, experience, personal knowledge and observations during the course of this investigation. Also, information provided to me by other law enforcement officers, information provided to me by witnesses and my review of documents and communications with others who have personal knowledge

of the events and circumstances described herein. The information outlined below is provided for the limited purpose of establishing probable cause, and does not contain all details or all facts that exist pertaining to this investigation.

3. In February 2018, DMIF TFO and Bloomfield Township Police Detective Jim Moschel advised your Affiant of a mail theft investigation being conducted in Bloomfield Hills, Bloomfield Township and West Bloomfield, MI in which all of the reports detailed the same suspect and vehicle used in the thefts. TFO Moschel advised the investigation began in October 2017 after numerous complaints of mail theft from local residents.

4. On January 16, 2018, Bloomfield Township resident AV-1 contacted Bloomfield Township Police regarding mail theft at his residence. AV-1 advised he purchased two Western Union money orders from a 7-11 on October 7, 2017 and made both payable to Verizon in the amount of \$500. AV-1 advised he placed the money orders, along with his Verizon bill, in his curbside mailbox for the postal carrier to pick-up and assumed his bill would be paid after Verizon received the money orders. However, AV-1 noticed an outstanding balance remained on his bill so he contacted Western Union,

and they traced the money orders he purchased. Both money orders were cashed at Super J Food Market, 31370 Ecorse, Romulus, MI on October 22, 2017. AV-1 stated Verizon had been crossed off the payee section and the name **DJUAN BARNES** was written instead. Surveillance footage was available for those two transactions and the person who cashed them presented a Michigan state identification card in the name of **DJUAN BARNES**, DOB 11/13/1980, 238 Horton Street, Detroit, MI 48202.

5. In October of 2017, AV-2, a resident of Bloomfield Township, advised police he never received a book of checks for his checking account in the mail, which were mailed to his residence by Chase Bank. One of these checks, in the amount of \$8,000, was successfully deposited via mobile deposit on October 17, 2017. Bank of America provided the IP address of 67.172.92.95 attached to the mobile deposit. This IP address came back to the Knights Inn, located at 9863 Middlebelt, Romulus, MI 48174.

Investigation revealed that **DJUAN BARNES** was checked into that hotel from October 17 through October 21, 2017.

5. On January 25, 2018, Bloomfield Hills, MI resident AV-3 reported that on January 18, 2018, he was supposed to receive a Bank of America

credit card in the mail but he never received it. Bank of America contacted him on January 25, 2018 and notified him that someone had purchased an airplane ticket through Delta Airlines for a flight departing on January 28, 2018. According to Delta Airlines, the ticket was purchased in the name of **DJUAN BARNES**.

6. On January 25, 2018, two residents of Bloomfield Township, MI reported mail theft in their neighborhood. AV-4 reported he witnessed a black male driving a gray, Dodge crossover vehicle with New York license plates, stopped in front of his neighbor's mailbox. His neighbor then advised police she had problems with mail theft since November 2017, including a missing \$200,000 check from Comerica Bank, and she also witnessed the same Dodge crossover vehicle (described above) stopped in front of her mailbox on previous occasions.

7. Also on January 25, Bloomfield Township Detective Sergeant (D/Sgt.) Hill conducted surveillance on Club Drive in Bloomfield Township, MI based on reports of mail theft. D/Sgt. Hill noticed a newer, dark gray Dodge Journey with a New York license plate drive by slowly. Using the surveillance footage and Michigan identification card from the Super J Food

Market of **DJUAN BARNES**, D/Sgt. Hill identified the individual driving the Dodge Journey as **DJUAN BARNES**.

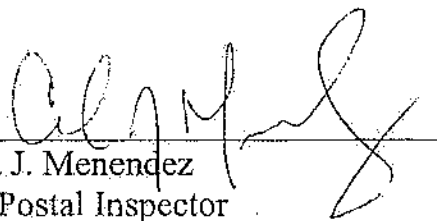
8. On January 26, 2018, Bloomfield Township police spotted the same vehicle in a subdivision located in the area of Wabeek and Lone Pine Drive. The license plate was noted to be New York plate HKDXXXX. This vehicle was reported stolen on September 23, 2017. In the report, the victim stated she rented a dark-colored 2017 Dodge Journey from EAN Holdings LLC (aka, Enterprise Car Rental) and loaned the vehicle to her relative, **DJUAN BARNES**, but he never returned the vehicle.

9. From February 9 through February 12, 2018, surveillance officers observed **DJUAN BARNES**, driving the Dodge Journey, going through mailboxes at multiple locations.

10. On February 13, 2018, your Affiant learned that **DJUAN BARNES** had been staying at the Woodspring Suites, 3576 Marketplace Circle, Rochester Hills, MI 48309, and had disappeared, abandoning numerous items. Among the abandoned items were a large quantity of mail and checks, credit cards, employment W-2s, and bank account statements that

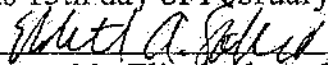
were in other people's names and appeared to be stolen. There was mail from several of the locations where surveillance officers had observed **DJUAN BARNES** taking mail from mailboxes.

11. **DJUAN BARNES** does not have any affiliation with the victims identified in the above paragraphs and was not authorized to use any of their personally identifiable information or take their mail. All of the locations described above are in the Eastern District of Michigan. Based on the information contained in this affidavit, your Affiant believes that probable cause exists to establish that, in the Eastern District of Michigan, **DJUAN BARNES** did unlawfully and knowingly violate Title 18, United States Code, § 1708 (Mail Theft), § 1028 (Identity Theft), § 1028A (Aggravated Identity Theft) and § 1029 (Access Device Fraud).



Carla J. Menendez
U.S. Postal Inspector

Subscribed and sworn to before me
this 15th day of February 2018.



Honorable Elizabeth A. Stafford
United States Magistrate/Judge