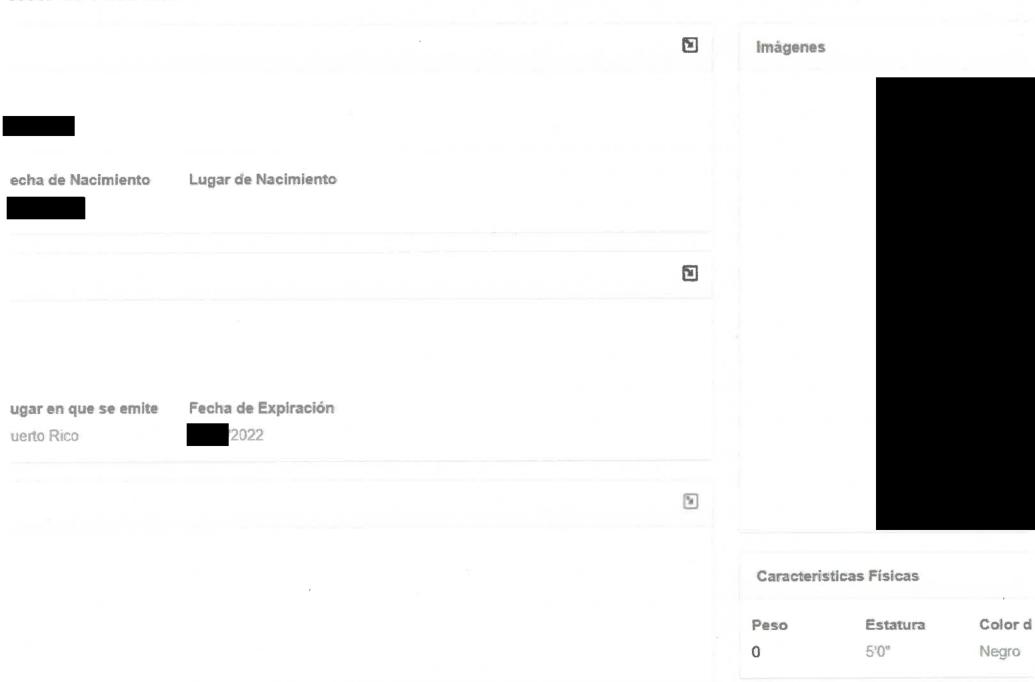
# ción de Persona



## ARREST REPORT



## State Police Middleboro

Court: Brockton DC

326 West Grove Street Middleboro, MA (508) 947-2222

Invest Officer:

Trooper Paul Martin ID# 3646

Activity Date/Time 03/26/2019 2210

Agency:

Incident Class: Traffic MV Stop

Location: FULLER STREET, BROCKTON, MA

Last: First:

Middle:

Suffix: DOB: Age:

SSN: License #: Lic. State: Address:

City/Town: State: 02301 Zip Code:

Phone #: Occupation:

Employer: Emp. Add:

Hispanic Race: Sex: Male Height: 506

150 Weight: Hair Color: Brown Eye Color: Brown Build: Thin

Complexion: Medium Marital Stat: Single Spouse:

Father: Mother: Dependents: 1 Birth Place: DR Citizenship: USA

**Custody Status:** 

Emp. Phn:

Booking Officer: Trooper Paul Martin ID# 3646 Desk Officer: Trooper Nicholas Lorenco ID# 4165 Photo Officer: Trooper Paul Martin ID# 3646 Miranda Given: Trooper Paul Martin ID# 3646 Υ

Print Officer: Trooper Paul Martin ID# 3646 Lang Rights: Visible Injuries: Ν

Positive Q5:

PREA Screening: Y Trooper Paul Martin ID# 3646

ICE Detainer?: N Detainer#:

Ν

Held on Detainer?: Phone Used: Number Called: M/W: Ν Detox Notified: Ν Medications:

Offered BT: N/A

Refused BT:

BT Results: 0.000 0.000 0.000

Bailed To:

OBTN: TSDH201901814

Booked @ MSP Middleboro

Charge(s):

Citation: 344001AA; 90-10-A UNLICENSED OPERATION OF MV

Citation: 344001AA; 90-24-E NEGLIGENT OPERATION OF MOTOR VEHICLE

Citation: 344001AA; 90-25-D STOP FOR POLICE, FAIL

Citation: 344003AA; 90-25-A IDENTIFY SELF, MV OPERATOR REFUSE

268-34A FALSE NAME/SSN, ARRESTEE FURNISH

WRNT-FEL WARRANT/FELONY

Citation: 344003AA; 90-16 OPERATION OF MOTOR VEHICLE, IMPROPER

# ARREST REPORT

## State Police Middleboro

326 West Grove Street Middleboro, MA (508) 947-2222

CASE#	

Invest Officer

Trooper Paul Martin ID# 3646

Court: Brockton DC

Agency:

Alias(es):

Distinguishing Marks:

Aliast DOB / SSN: Address: License# / State: Alias: DOB / SSN: Address: License# / State: Alias: DOB / SSN: Address:

Vehicle(s):

License# / State:

MA PAN 7XC119 2007 Honda ODYSSE GRAY

VIN: 5FNRL38677B028706

George's Towing ARBELLA MUTUAL INS

Other Property/Evidence Involved In Case:

Arrest Narrative:

Arrest - Valdesaviles

## By Trooper Paul L Martin #3646

- 1. On Wednesday March 26th 2019 at approximately 2210 hours I Tpr P Martin #3646 was on patrol in the city of Brockton. I was in a fully marked State Police cruiser #811 and patrolling on Fuller Street, a public way, when I heard the sound of a vehicle accelerating very quickly. Simultaneously I also heard the squealing of tires on the paved roadway. These sounds were coming from the area of Belmont Street. I then observed a Gray Honda Odyssey turn onto Fuller street still driving at a high rate of speed and squealing the tires from taking the corner so fast. That vehicle then passed my cruiser parked in the funeral home parking lot. I then got out behind the vehicle, activated the cruiser emergency lights and sirens and attempted to stop this vehicle. The vehicle was bearing Massachusetts registration 7XC119.
- 2. The operator failed to stop and continued to drive down Fuller Street. The operator then pulled into the driveway at 30 Fuller Street and exited the vehicle. I then exited the cruiser, directed the operator to the ground, he was then handcuffed, pat/frisked for weapons, and detained in my cruiser. There were two other occupants in the vehicle who stated they lived at that address. They were pat/frisked for weapons and allowed to leave. The operator stated he was A CJIS guery revealed no results DOB for a drivers license. The operator spoke primarily Spanish but did speak some English. The operator did have two picture identifications his wallet that was in his back right pocket. The first identification was a Dominican Republic Identification

Status:	Approved

# CASE #

## ARREST REPORT State Police Middleboro

326 West Grove Street Middleboro, MA (508) 947-2222

card stating he was  I attempted to located drivers licenses on various combinations of those names with negative results  3. The operator was then advised he was being arrested for Unlicensed Operation, Negligent Operation, an Fail to Stop for Police. The vehicle was towed and he was transported to SP Middleboro for booking. Once in booking he was given a copy of the Miranda rights in Spanish. He took a few minutes to read over it and then gave me a thumbs up and shook his head up and down. I took that as he understood his rights.  4. During booking he was also fingerprinted. The results of the fingerprints revealed he was untruthful about his identity. Fingerprint results revealed his true name to be revealed a WMS warrant # Out of Lawrence District Court for Unlicensed Operation, Identity Fraud, Witness Intimidation, False Statement in Application for License, Possess to Distribute Class B Drug, Negligent Operation of Motor Vehicle, Fail to Stop for Police, and Motor Vehicle Operator Refuse to Identity Self. This warrant was verified as being issued for my prisoner by viewing AF Results of booking photos from the initial arrest.  5. Once booking was complete was charged with Unlicensed Operation(90-10), Negligent Operation(90-24), Fail to Stop for Police(90-25), MV Operator Refuse ID(90-25), Arrestee Furnish False Name(268-34A), and Improper Operation of Motor Vehicle(90-16). Once booking was complete he was held pending bail.				
I attempted to located drivers licenses on various combinations of those names with negative results  3. The operator was then advised he was being arrested for Unlicensed Operation, Negligent Operation, an Fail to Stop for Police. The vehicle was towed and he was transported to SP Middleboro for booking. Once in booking he was given a copy of the Miranda rights in Spanish. He took a few minutes to read over it and then gave me a thumbs up and shook his head up and down. I took that as he understood his rights.  4. During booking he was also fingerprinted. The results of the fingerprints revealed he was untruthful about his identity. Fingerprint results revealed his true name to be possible to be possible to the falsely assumed this identity as the RMV photo did not match this prisoner. Further inquiry intervealed a WMS warrant out of Lawrence District Court for Unlicensed Operation, Identity Fraud, Witness Intimidation, False Statement in Application for License, Possess to Distribute Class B Drug, Negligent Operation of Motor Vehicle, Fail to Stop for Police, and Motor Vehicle Operator Refuse to Identity Self. This warrant was verified as being issued for my prisoner by viewing AF Results of booking photos from the initial arrest.  5. Once booking was complete was charged with Unlicensed Operation(90-25), Arrestee Furnish False Name(268-34A), and Improper Operation of Motor Vehicle(90-16). Once booking was complete he was		•	Court:	Brockton DC
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Fail to Stop for Police. The vehicle was towed and he was transported to SP Middleboro for booking. Once in booking he was given a copy of the Miranda rights in Spanish. He took a few minutes to read over it and then gave me a thumbs up and shook his head up and down. I took that as he understood his rights.  4. During booking he was also fingerprinted. The results of the fingerprints revealed he was untruthful about his identity. Fingerprint results revealed his true name to be revealed he falsely assumed this identity as the RMV photo did not match this prisoner. Further inquiry intervealed a WMS warrant # out of Lawrence District Court for Unlicensed Operation, Identity Fraud, Witness Intimidation, False Statement in Application for License, Possess to Distribute Class B Drug, Negligent Operation of Motor Vehicle, Fail to Stop for Police, and Motor Vehicle Operator Refuse to Identity Self. This warrant was verified as being issued for my prisoner by viewing AF Results of booking photos from the initial arrest.  5. Once booking was complete was charged with Unlicensed Operation(90-10), Negligent Operation(90-24), Fail to Stop for Police(90-25), MV Operator Refuse ID(90-25), Arrestee Furnish False Name(268-34A), and Improper Operation of Motor Vehicle(90-16). Once booking was complete he was		•		_
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Operation(90-24), Fail to Stop for Police(90-25), MV Operator Refuse ID(90-25), Arrestee Furnish False Name(268-34A), and Improper Operation of Motor Vehicle(90-16). Once booking was complete he was	-			issued for my prisoner by viewing AFIS
	Operation(9 Name(268-	90-24), Fail to Stop for Police(34A), and Improper Operation	(90-25), MV Operator Refus	se ID(90-25), Arrestee Furnish False

# CASE#

## **ARREST REPORT State Police Middleboro**

326 West Grove Street Middleboro, MA (508) 947-2222

Invest Officer: Agency:	Trooper Paul Martin ID# 3646 D-4	Court: Brockton DC			
Trooper Paul	L Martin #3646	Trooper Paul L Martin #3646			



## ARREST REPORT **State Police Middleboro**

326 West Grove Street Middleboro, MA (508) 947-2222

Invest Officer:

Trooper Paul Martin ID# 3646

Agency:

Court: Brockton DC

Status: Approved



# State Police Middleboro VEHICLE INVENTORY REPORT



The state of the s		•	
Case #:			
Station/Unit: State Police Middleboro	Date/Time:	March 26, 2019 22:10	
Reason for Tow:			
Location: FULLER STREET, BROCKTON, MA			
Registration: 7XC119 State: MA Make: Honda	Color: GRAY		
VIN: 5FNRL38677B028706 Configuration:			
Visible Contents Before Towing:			
Damage to Vehicle Before Towing:			
Operator's Name:			
Owner's Name:			
	02301		
Remarks:			
Location Towed: George's Towing			
Tow Company: George's Towing			
Reporting Officer: Trooper Paul Martin #3646	Time Requested:	Time Arrived:	

Supervisor's Signature:	Date:
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# **Complaint Application Reports**

Felony Misdemeanor Warrant Court Copy Accused Fiscal Copy Investigation

No No No CourtCopy AccusedCopy FiscalCopy Statement

	APPLICATI CRIMINAL CO	-	APPLICATION NO. (COURT US	E ONLY)	Pag	e 1 of 3	TRIAL COURT OF MASSACHUSETT DISTRICT COURT DEPARTMENT		
			at a criminal complaint issue agains NOT BEEN ARRESTED and the o				Brockton DC 215 Main Street		Street
	ONLY MISDEME	ANOR(S), I request a	a hearing WITHOUT NO	TICE beca	ause of im	minent threat	Bro	ckton, M	A 02301
	BODILY INJURY	COMMISSIO	N OF A FLIGHT	WITH	NOTICE	to accused			
	ONE OR MORE F	ELONIES, I request	a WITHOUT	WIT	H NOTIC	E to accused			OF ACCUSED
	WARRANT is re-	quested because pro	secutor represents that accused m	ay not ap	pear unle	SS	X HAS	HAS NO	T been arrested
			INFORMATION AB	OUT A	CCUSE	D	- m - 1		of all to T
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				X	POLICE	CITIZEN	OTHE	R	M.S.P.
	oper Paul Mar RESS	TIFT					OF OFFENSE		
	e Police Middlebor	0		INC		FULLER STRE EPORT NO.	ET, BROCKT	ON, MA	
	West Grove Street			INC	JDEN I R	EPORT NO.	TS	OB 11 DH2019	
Mido	lleboro, MA 02346		Œ			CITA	TION NO(S)		
	OFFENSE CODE	CHA	ARGE DESCRIPTION CITAT	ION #:			OFFENSE	DATE	
1	268-34A		SE NAME/SSN, ARRESTEE FURNISH		la informat	iani ana Camalaia	Al assures Mar	03/26/2	019
	VARIABLES (e.g. vi	ictim name, controlled s	ubstances, type and value of property.	omer variao	ile informat	ion; see Compiain	it Language Mar	iuai)	3:
	OFFENSE CODE 90-10-A		ARGE DESCRIPTION CITAT	TION #: 344	1001AA		OFFENSE	DATE 03/26/2	019
2			ubstances, type and value of property.	other variab	le informat	ion; see Complain	t Language Mar		
	OFFENSE CODE			TION #: 344	1003AA		OFFENSE		
3	90-16 VARIABLES (e.g. v		RATION OF MOTOR VEHICLE, IMPRO ubstances, type and value of property. o		le informat	ion; see Complain	it Language Mar	03/26/2 nual)	:019
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REM.	ARKS		1	COMPLAI	NAN I'S	SIGNATURE		DATE	FILED
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		IMMINENT THE					SED		
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I		ARRAIGNMENT DAT	E.						

	APPLICATION CRIMINAL CO		APPLICATION NO. (COURT US	E ONLY)	Page 2 o	of 3			ASSACHUSETTS DEPARTMENT
I, the undersigned complainant, request that a criminal complaint issue against the accused charging the offense(s) listed below. If the accused HAS NOT BEEN ARRESTED and the charges involve:  Brockton DC 215 Main Street									
	ONLY MISDEME.	ANOR(S), I request a	hearing WITHOUT NO	TICE beca	ause of immin	ent threat	Bro	ckton, M	A 02301
	BODILY INJURY	COMMISSIO	N OF AFLIGHT [	with	NOTICE to a	accused .	ADDECT	TATUO	OF ACCUSED
		ELONIES, I request			H NOTICE to	accused			OF ACCUSED T been arrested
	WARRANT is red	quested because pro	secutor represents that accused m	ay not ap	pear unless	Į.	X HAS	HAS NO	T been arrested
			INFORMATION AB						
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		EMPLOYER/SCI	HOOL	МОТ	HER MAIDE	N NAMÉ	F.	ATHER'S	NAME
	COLUMN TO SERVICE		CASE INFOR	RMATIO	N				
CON	IPLAINANT NAME	(FIRST MI LAST)	OAGE IIII GI			PLAINANT T	TYPE		PD
	oper Paul Mar			XF	POLICE	CITIZEN	OTHE	R	M.S.P.
	RESS						OF OFFENSE		
	Police Middlebor	0		INC	IDENT REPO		ET, BROCKTON, MA OBTN		
	West Grove Street			INC	JIDENT REPO	JKT NO.	TS	TSDH201901814	
Mido	ileboro, MA 02346					CITAT	TION NO(S)		
	OFFENSE CODE			ION #: 344	1001AA		OFFENSE		
4	90-24-E		BLIGENT OPERATION OF MOTOR VEI ubstances, type and value of property. o		le information:	see Complaint	Language Man	03/26/2019 lanual)	
						occ Complain			
	OFFENSE CODE 90-25-A		ARGE DESCRIPTION CITAT NTIFY SELF, MV OPERATOR REFUSE	TION #: 344 E	1003AA		OFFENSE	DATE 03/26/2	019
5	VARIABLES (e.g. vi		ubstances, type and value of property.		ole information;	see Complaint	t Language Man	ual)	
	OFFENSE CODE		ARGE DESCRIPTION CITAT	TION #: 344	4001AA		OFFENSE	DATE 03/26/2	010
6	90-25-D VARIABLES (e.g. vi		ubstances, type and value of property.	other variab	ole information;	see Complaint	t Language Man		019
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REM.	ARKS		(	COMPLAI	INANT'S SIGI	NATURE		DATE	FILED
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	DATE	PRO	DCESSING OF NON-ARREST AP	PLICATION	ON (COURT I	JSE ONLY)	10.7	CLERI	K/JUDGE
			CLERK'S HEARING SCHEDULED						
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1	FELONY CHARGED AND POLICE DO NOT REQUEST NOTICE  FELONY CHARGED BY CIVILIAN: NO NOTICE AT CLERK'S DISCRETION								
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	DATE		OMPLAINT TO ISSUE SE FOUND FOR ABOVE OFFENSE(S)		-	NT DENIED BLE CAUSE		CLE	RK/JUDGE
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		WARRANT ARRAIGNMENT DAT	SUMMONS TO ISSUE E:	c	OMMENT				

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT US	SE ONLY	Page	3 of 3			ASSACHUSETTS DEPARTMENT
offense(s) listed below. If the accuse ONLY MISDEMEANOR(S), I rec		charges i	involve: cause of im	minent threat	2	Brocktor 15 Main ckton, M	Street
	ISSION OF A FLIGHT		H NOTICE		ADDECT	CTATUC	OF ACCUSED
ONE OR MORE FELONIES, I re	-	_		E to accused			
WARRANT is requested becau	se prosecutor represents that accused m	nay not a	ppear unles	ss Į	X HAS	HAS NO	T been arrested
	INFORMATION AE	OUT A	CCUSE	0	- L		
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	PLEXION SCARS/MARKS/TATTOOS	BIRTH	I STATE O	R COUNTRY		DAY PH	IONE
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COMPLAINANT NAME (FIRST MI LA	CASE INFO	KIVIATIC		OMPLAINANT T	YPE		PD
,	(31)	Ιx	POLICE	CITIZEN	OTHE	R	M.S.P.
Trooper Paul Martin					OF OFFENSE		
ADDRESS State Police Middleboro				FULLER STRE	ET, BROCKT	ON, MA	
326 West Grove Street		IN	CIDENT RE	EPORT NO.		OBTN	
Middleboro, MA 02346		<u> </u>		CITA	TION NO(S)	DH2019	U1814
OFFENSE CODE WRNT-FEL	WARRANT/FELONY	TION #:			OFFENSE	03/26/2	019
VARIABLES (e.g. victim name, cont WR5258595TC/1618CR001756	olled substances, type and value of property.	other varia	ble information	on; see Complaint	Language Mar	iual)	
REMARKS		COMPLA	AINANT'S S	IGNATURE		DATE	FILED
	PON THIS COMPLAINT APPLICATION AT THE ABOVE COURT ADDRESS OF		DATE O		TIME	OF HEA	RING
DATE	PROCESSING OF NON-ARREST AP	PLICATI	ON (COUR			CLER	K/JUDGE
	T OF CLERK'S HEARING SCHEDULED			,			
NOTICE SET	IT OF JUDGE'S HEARING SCHEDULE	ON:					
HEARING C	ONTINUED TO:						
APPLICATIO	N DECIDED WITHOUT NOTICE TO AC	CUSED	BECAUSE	:			
IMMINEN	T THREAT BODILY INJURY	CRIME	FLIG	HT BY ACCUS	ED		
FELONY	CHARGED AND POLICE DO NOT REQ	UEST N	OTICE				
FELONY	CHARGED BY CIVILIAN: NO NOTICE, A	AT CLERI	K'S DISCR	ETION			
DATE	COMPLAINT TO ISSUE	MIL.	COMP	LAINT DENIED		CLE	RK/JUDGE
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WARRANT			COMMENT				

COURT COPY

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT US	E ONLY)	Page 2	of 4	TRIAL COURT OF DISTRICT COUR	MASSACHUSETTS T DEPARTMENT		
I, the undersigned complainant, request the offense(s) listed below. If the accused HAS	NOT BEEN ARRESTED and the	charges involve:			Brockton DC 215 Main Street Brockton, MA 02301			
ONLY MISDEMEANOR(S), I request a BODILY INJURY COMMISSION		_	use of Immi NOTICE to					
ONE OR MORE FELONIES, I request WARRANT is requested because pro			I NOTICE t	li li		JS OF ACCUSED NOT been arrested		
TWING WITH ISTOCHASCO DOCUCCO PIC	INFORMATION AB							
NAME (FIRST MI LAST) AND ADDRESS			RTH DATE		SOCIAL SEC	URITY NUMBER		
			PCF NO. 5380712			AL STATUS		
		DRIVE	ERS LICEN			SE STATE		
02301		GEND	ER	HEIGHT	WEIGHT	EYES		
HAIR RACE COMPLEX	ION SCARS/MARKS/TATTOOS	Male		506 COUNTRY	150	Brown		
Brown Hispanic Medium	1		DR					
EMPLOYER/SC	HOOL	MOTH	HER MAIDE	EN NAME	FATHE	R'S NAME		
	CASE INFO	RMATION						
COMPLAINANT NAME (FIRST MI LAST)			OLICE CON	MPLAINANT 1	TYPE OTHER	PD M.S.P.		
Trooper Paul Martin				PLACE	OF OFFENSE	-		
ADDRESS State Police Middleboro		FULLER STREET INCIDENT REPORT NO.			ET, BROCKTON, M	ET, BROCKTON, MA OBTN		
326 West Grove Street		INCI	DENT REP		TSDH20			
Middleboro, MA 02346				CITAT	TION NO(S)			
	ARGE DESCRIPTION CITAT SE NAME/SSN, ARRESTEE FURNISH	TION #:			OFFENSE DATE 03/2	6/2019		
VARIABLES (e.g. victim name, controlled s	ubstances, type and value of property.	other variable	information	; see Complain	t Language Manual)			
	ARGE DESCRIPTION CITAT	TION #: 3440	001AA		OFFENSE DATE 03/2	6/2019		
VARIABLES (e.g. victim name, controlled s	ubstances, type and value of property.	other variable	e information	; see Complain	t Language Manual)			
	ARGE DESCRIPTION CITATERATION OF MOTOR VEHICLE, IMPR	TION #: 3440 OPER	03AA		OFFENSE DATE 03/2	6/2019		
VARIABLES (e.g. victim name, controlled s	ubstances, type and value of property.	other variable	e information	; see Complain	t Language Manual)			
REMARKS		COMPLAIN	IANT'S SIG	NATURE	DA	E FILED		
	THIS COMPLAINT APPLICATION HE ABOVE COURT ADDRESS OF		DATE OF		TIME OF HI	ARING		
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	APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT US	SE ONLY)	Page 3 o	f 4	TRIAL COURT O DISTRICT COL		
I, the	undersigned complainant, request tha se(s) listed below. If the accused HAS	t a criminal complaint issue agains NOT BEEN ARRESTED and the	at the accused charging the charges involve:			Brockton DC 215 Main Street		
	ONLY MISDEMEANOR(S), I request a	<u> </u>	TICE becau	use of immine	ent threat	Brockto	n, MA	A 02301
	BODILY INJURY COMMISSIO			NOTICE to a		ARREST STA	TUS	OF ACCUSED
닏	ONE OR MORE FELONIES, I request			NOTICE to	accused			T been arrested
Ш	WARRANT is requested because pro-			- 744 - 1		X 11/40		
NIA	ME (EIDET MILLACT) AND ADDRESS	INFORMATION AB		RTH DATE		SOCIAL S	ECUR	RITY NUMBER
NA	ME (FIRST MI LAST) AND ADDRESS		51,	MINDAIL				MIT HOMBER
				PCF NO. 5380712		MAR	ITAL Sing	STATUS
			DRIVE	ERS LICENS	E NO.	LICI	Ť	STATE
023	01		5.4.7.					
			GENDI Male		HEIGHT 506	WEIGHT 150		EYES Brown
	HAIR RACE COMPLEXI Brown Hispanic Medium	ON SCARS/MARKS/TATTOOS	BIRTH	STATE OR C	OUNTRY	DA	Y PH	ONE
	EMPLOYER/SCH	HOOL	MOTH	HER MAIDEN	NAME	FATH	IER'S	NAME
		CASE INFO	DMATION					
COM	IPLAINANT NAME (FIRST MI LAST)	CASE INFO	RMATION		PLAINANT T	TYPE		PD
	oper Paul Martin		XP	OLICE	CITIZEN	OTHER		M.S.P.
	RESS	<b>*</b>				OF OFFENSE		
	Police Middleboro		INC				T, BROCKTON, MA OBTN	
326	West Grove Street		INCIDENT REPORT NO.				DH201901814	
Midd	leboro, MA 02346				CITA	TION NO(S)		
			TION #: 3440	01AA		OFFENSE DA		
4	90-24-E NEG VARIABLES (e.g. victim name, controlled so	BLIGENT OPERATION OF MOTOR VE		e information: s	see Complain		3/26/20	019
,		ARGE DESCRIPTION CITAT NTIFY SELF, MV OPERATOR REFUSE	TION #: 3440 E	JUJAA		OFFENSE DA	1 E 3/26/20	019
5	VARIABLES (e.g. victim name, controlled so	ubstances, type and value of property.	other variable	e information; s	see Complain	t Language Manual)		
$\overline{}$			TION #: 3440	001AA		OFFENSE DA		
6	90-25-D STO VARIABLES (e.g. victim name, controlled si	P FOR POLICE, FAIL	other variable	e information: s	see Complain		3/26/2	019
	VALUED (e.g. Your Harry, controlled of	abotation, type and value of property.	- Tanabi					
REM	ARKS			NANT'S SIGN		D	ATE	FILED
cou		THIS COMPLAINT APPLICATION HE ABOVE COURT ADDRESS OF		DATE OF H		TIME OF	HEAI	RING
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	APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT US	E ONLY)	Page 4 of 4			ASSACHUSETTS DEPARTMENT	
	e undersigned complainant, request that se(s) listed below. If the accused HAS					Brocktor 215 Main	Street	
	ONLY MISDEMEANOR(S), I request a	·		use of imminent threat		Brockton, M	A 02301	
	BODILY INJURY COMMISSIO		WITH	NOTICE to accused	ABBE	CT CTATUC	OF ACCUSED	
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	WARRANT is requested because pro				LAIRAS	IIAS NO	or been alrested	
		INFORMATION AB				15.4		
NA	ME (FIRST MI LAST) AND ADDRESS		Bil	RTH DATE	SC	CIAL SECU	RITY NUMBER	
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023	01							
		-	GENDI Male		, w	/EIGHT 150	EYES Brown	
	HAIR RACE COMPLEXI Brown Hispanic Medium	ON SCARS/MARKS/TATTOOS	BIRTH S	STATE OR COUNTRY DR		DAY PH	IONE	
	EMPLOYER/SCI	HOOL	MOTH	HER MAIDEN NAME		FATHER'S	SNAME	
		CASE INFOR	RMATION			100 - 110		
CON	IPLAINANT NAME (FIRST MI LAST)			COMPLAINANT		TUED	PD	
Tro	oper Paul Martin		X P	OLICE CITIZEN	OF OFFE	THER	M.S.P.	
	RESS			FULLER STR				
	e Police Middleboro West Grove Street		INCI	DENT REPORT NO.		OBTI		
	leboro, MA 02346		TSDH201901814  CITATION NO(S)					
				3111.	NO ORPOWINES WAS	"		
		ARGE DESCRIPTION CITAT	TON #:		OFFE	NSE DATE 03/26/2	019	
7	VARIABLES (e.g. victim name, controlled so WR5258595TC/1618CR001756	ubstances, type and value of property. c	other variable	e information; see Complai	nt Language	Manual)		
REM	ARKS		COMPLAIN	IANT'S SIGNATURE		DATE	FILED	
COU		THIS COMPLAINT APPLICATION HE ABOVE COURT ADDRESS ON		DATE OF HEARING		ME OF HEA	RING	
	TILLD AT TI	IL ADOVE GOOK! ADDICEGO OF	•		AT			

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APPLICAT CRIMINAL C		APPLICATION NO. (COURT L	JSE ONLY)	Page 1 of 3			SSACHUSETTS DEPARTMENT
I, the undersigned cor offense(s) listed below	mplainant, request the	at a criminal complaint issue agai S NOT BEEN ARRESTED and the	nst the accur e charges in	sed charging the volve:	21	Brockton 5 Main S kton, MA	Street
ONLY MISDEME	ANOR(S), I request	a hearing WITHOUT N	OTICE beca	use of imminent threat	Broc	KION, IVIA	(02301
BODILY INJURY	_		<u> </u> With	NOTICE to accused			
ONE OR MORE	FELONIES, I request	a WITHOUT	witi	H NOTICE to accused	ARREST S	TATUS	OF ACCUSED
WARRANT is re	equested because pro	secutor represents that accused	may not app	ear unless	X HAS 🔲	HAS NO	T been arrested
		INFORMATION A	BOUT AC	CUSED			
NAME (FIRST MI LA	AST) AND ADDRESS		BOUTAC	COSED			
02301							
		CASE INFO	RMATION			100	
COMPLAINANT NAM	E (FIRST MI LAST)			COMPLAINANT			PD
Trooper Paul Mai	rtin		X P	OLICE CITIZEN	OTHER	₹	M.S.P.
Trooper raar man				PLACE	OF OFFENSE		
			8	FULLER STRE	ET, BROCKTO	N, MA	
			INC	DENT REPORT NO.		OBTN	
					TSI	DH20190	)1814
				CITA See Offense Descr	TION NO(S) iption Below for	Citation	#
OFFENSE COD	E CH	IARGE DESCRIPTION CIT	TATION #:		OFFENSE	DATE	
268-34A	FAI	LSE NAME/SSN, ARRESTEE FL	JRNISH			03/26/2	019
VARIABLES (e.g	g. victim name, contro	olled substances, type and value	of property.	other variable information	n; see Complair	nt Langua	age Manual)
OFFENSE COD	E CH	ARGE DESCRIPTION CIT	TATION #: 34	44001AA	OFFENSE	DATE	
90-10-A	UN	LICENSED OPERATION OF MV	1			03/26/2	019
2 VARIABLES (e.g		olled substances, type and value		other variable informatio	n; see Complair	nt Langua	age Manual)
OFFENSE COD	- CH	IADOE DESCRIPTION OF	TATION #: 34	44002AA	OFFENSE	DATE	
90-16		HARGE DESCRIPTION CIT PERATION OF MOTOR VEHICLE			OFFENSI	03/26/2	019
2		olled substances, type and value			n: see Complair		
<u> </u>			, ,				,
REMARKS			COMPLAINAN	IT'S SIGNATURE		DATE F	ILED
COURT USE ONLY		THIS COMPLAINT APPLICATION THE ABOVE COURT ADDRESS		DATE OF HEARING	AT TIME (	OF HEAF	RING
been made in this cou by a Magistrate to def held at the time and d es with you and you n	urt by the complainan termine whether crim late shown above. Yo nay also bring a lawy	TO THE ACCUSE! for a criminal complaint to issue it named above. This notice is to inal proceedings will be commen- ou may appear at this time to pre er, although it is not required that Clerk-Magistrate's office upon you	against you to inform you to ced against yes ent your side to you be represent your particles.	for the offense(s) listed a hat a hearing will be hele you in this matter. The had de of the case. You may esented by counsel.	d at this court learing will be bring witness-		
	or your hearing at the	e time and date noted, the crimina	al complaint i	may issue against you o	n that date.		

	APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT US	SE ONLY)	Page 2 of 3	TRIAL COURT OF MASSACHUSE DISTRICT COURT DEPARTMENT	
I, the undersigned complainant, request that a criminal complaint issue against the offense(s) listed below. If the accused HAS NOT BEEN ARRESTED and the charge			st the accus	sed charging the volve:	Brockton DC 215 Main Street Brockton, MA 02301	
	ONLY MISDEMEANOR(S), I request a BODILY INJURY COMMISSIO ONE OR MORE FELONIES, I request WARRANT is requested because pro	ON OF A FLIGHT	WITH WITH	NOTICE to accused H NOTICE to accused ear unless	ARREST STATUS OF ACCUSE	
		INFORMATION A	OUT AC	CHEED	Warrier of the 20	- 4
_NA	ME (FIRST MI LAST) AND ADDRESS	100 140	SOUT AC	CUSED		
		CASE INFO	RMATION			
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Trooper Paul Martin					OF OFFENSE	$\dashv$
				FULLER STRE	ET, BROCKTON, MA	
			INC	DENT REPORT NO.	OBTN TSDH201901814	
					TION NO(S) iption Below for Citation #	
	OFFENSE CODE CH	IARGE DESCRIPTION CITA	ATION #: 34	14001AA	OFFENSE DATE	=
4		GLIGENT OPERATION OF MOTO			03/26/2019	
	VARIABLES (e.g. victim name, contro	olled substances, type and value o	f property.	other variable information	n; see Complaint Language Manual	) —
	_	HARGE DESCRIPTION CITA ENTIFY SELF, MV OPERATOR RI	ATION #: 34	44003AA	OFFENSE DATE 03/26/2019	
5	VARIABLES (e.g. victim name, contro			other variable information	44,24,2010	)
П	_		ATION #: 3	44001AA	OFFENSE DATE 03/26/2019	
6	VARIABLES (e.g. victim name, contro	OP FOR POLICE, FAIL olled substances, type and value o	f property.	other variable informatio		)
						_
REMA	ARKS	C	OMPLAINAN	NT'S SIGNATURE	DATE FILED	
cou		THIS COMPLAINT APPLICATION THE ABOVE COURT ADDRESS O		DATE OF HEARING	TIME OF HEARING AT	
bee by a held es v	are hereby notified that an application n made in this court by the complainan Magistrate to determine whether crim i at the time and date shown above. Y vith you and you may also bring a lawy	nt named above. This notice is to in inal proceedings will be commence ou may appear at this time to pres wer, although it is not required that	igainst you nform you t ed against y ent your sid you be repr	for the offense(s) listed a hat a hearing will be hel- you in this matter. The hade of the case. You may be sented by counsel.	d at this court learing will be bring witness-	
	ase bring this notice and report to the C d above.	Clerk-Magistrate's office upon your	arrival at th	ne court. The court hous	e address is	
If yo	ou do not appear for your hearing at the	e time and date noted, the criminal	complaint	may issue against you o	n that date.	

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT	USE ONLY)	Page 3 of 3		L COURT OF M STRICT COURT	ASSACHUSETTS DEPARTMENT
I, the undersigned complainant, request the offense(s) listed below. If the accused HAS ONLY MISDEMEANOR(S), I request a BODILY INJURY COMMISSIO ONE OR MORE FELONIES, I request WARRANT is requested because pro-		Brockton DC 215 Main Street Brockton, MA 02301  ARREST STATUS OF ACCUSED X HAS HAS NOT been arrested				
	INFORMATION	ABOUT AC	CUSED			
NAME (FIRST MI LAST) AND ADDRESS 02301						
	CASE INF	ORMATION				
COMPLAINANT NAME (FIRST MI LAST)			COMPLAINAN	IT TYPE	_	PD
Trooper Paul Martin		X P	OLIÇE CITIZI		OTHER	M.S.P.
			PI A	CE OF C	FFENSE	
				REET, E	ROCKTON, MA	
		INCI		REET, E	OBT	'n
		INCI	FULLER ST DENT REPORT NO.	TATION	OBT TSDH201	N 901814
		INCI	FULLER ST DENT REPORT NO.	TATION	OBT TSDH201 NO(S) Below for Citatio OFFENSE DATI	N 901814 on #
WRNT-FEL WA	RRANT/FELONY	CITATION #:	FULLER ST DENT REPORT NO. CI See Offense De	TATION scription	OBT TSDH201 NO(S) Below for Citatio OFFENSE DATI	in 901814 on # E /2019
WRNT-FEL WA	RRANT/FELONY	CITATION #:	FULLER ST DENT REPORT NO. CI See Offense De	TATION scription	OBT TSDH201 NO(S) Below for Citatio OFFENSE DATI	in 901814 on # E /2019
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7 WRNT-FEL WA VARIABLES (e.g. victim name, contro WR5258595TC/1618CR001756  REMARKS  COURT USE ONLY A HEARING UPON	RRANT/FELONY	complainan	FULLER ST DENT REPORT NO.  CI See Offense De	TATION scription	OBT TSDH201 NO(S) Below for Citatio OFFENSE DATI 03/26 Complaint Lang	901814 on # E /2019 juage Manual)
7 WRNT-FEL WA VARIABLES (e.g. victim name, contro WR5258595TC/1618CR001756  REMARKS  COURT USE ONLY A HEARING UPON	TO THE ACCUS of or a criminal complaint to issue to named above. This notice is inal proceedings will be comme four may appear at this time to preer, although it is not required the substant of the complaint to the comme four may appear at this time to preer, although it is not required the substant of the comme for the complaint to the comme for the complaint the comme for the complaint the comme for the complaint the	COMPLAINAN  COMPLA	See Offense De  ther variable information  T'S SIGNATURE  DATE OF HEARING  BOVE for the offense(s) listenat a hearing will be rou in this matter. The of the case. Your resented by counsel.	TATION scription scription; see	OBT TSDH201 NO(S) Below for Citatio 03/26 Complaint Lang DATE TIME OF HE has his court g will be g witness-	901814 on # E /2019 juage Manual)

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT US	E ONLY)	Page 1	1 of 3	TRIAL COURT OF MASSACHUSETTS DISTRICT COURT DEPARTMENT		
I, the undersigned complainant, request that a criminal complaint issue against the accused charging the offense(s) listed below. If the accused HAS NOT BEEN ARRESTED and the charges involve:  ONLY MISDEMEANOR(S), I request a hearing WITHOUT NOTICE because of imminent threat BODILY INJURY COMMISSION OF A FLIGHT WITH NOTICE to accused ONE OR MORE FELONIES, I request a WITHOUT WITH NOTICE to accused WARRANT is requested because prosecutor represents that accused may not appear unless					Brockton DC 215 Main Street Brockton, MA 02301  ARREST STATUS OF ACCUSED  X HAS HAS NOT been arrested		
A THE PERSON NAMED IN	INFORMATION AB				Land Field		
NAME (FIRST MI LAST) AND ADDRESS			RTH DATE		SOCIAL SECU	JRITY NUMBER	
			PCF NO. 5380712 ERS LICEN		S	L STATUS ingle E STATE	
02301		GENDI Male	ER	HEIGHT 506	WEIGHT 150	EYES Brown	
HAIR RACE COMPLEXI Brown Hispanic Medium	ON SCARS/MARKS/TATTOOS	BIRTH S	STATE OR DR	COUNTRY	DAY P	HONE	
EMPLOYER/SCI	HOOL	МОТН	HER MAID	EN NAME	FATHER	'S NAME	
ENTERS LA STATE	CASE INFOR	MATION	000	W-N NOVE -			
COMPLAINANT NAME (FIRST MI LAST)		XP	OLICE T	MPLAINANT T	OTHER	PD M.S.P.	
Trooper Paul Martin			-	PLACE	OF OFFENSE ET, BROCKTON, MA		
State Police Middleboro 326 West Grove Street		INCIDENT REPORT NO.			OBTN TSDH201901814		
Middleboro, MA 02346			See C	CITAT	TION NO(S) ption Below for Citation		
	ARGE DESCRIPTION CITAL SE NAME/SSN, ARRESTEE FUR	TION #:			OFFENSE DAT		
VARIABLES (e.g. victim name, control			ther variat	ole information			
	LICENSED OPERATION OF MV	TION #: 34		ole information	OFFENSE DATI	/2019	
VARIABLES (e.g. Vicini name, contro	iled substances, type and value of	property. c	Allici varias	ore imormation	i, see Complaint Lang	dage Manual)	
90-16 OP	ARGE DESCRIPTION CITA ERATION OF MOTOR VEHICLE, I	TION #: 34 MPROPER			OFFENSE DAT 03/26		
VARIABLES (e.g. victim name, control	illed substances, type and value of	property. c	other varial	ole information	r; see Complaint Lang	uage Manual)	
					Joan Joan	55150	
REMARKS				NT'S SIGNATI	URE DAT	E FILED	
	THIS COMPLAINT APPLICATION HE ABOVE COURT ADDRESS OF		DATE OF		TIME OF HE	ARING	

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT US	E ONLY)	Page 2 of 3	TRIAL COURT OF MASSACHUSETTS DISTRICT COURT DEPARTMENT		
I, the undersigned complainant, request that a criminal complaint issue against the accused charging the offense(s) listed below. If the accused HAS NOT BEEN ARRESTED and the charges involve:					Brockton DC 215 Main Street Brockton, MA 02301	
ONLY MISDEMEANOR(S), I request	a hearing WITHOUT NOT	TICE becau	use of imminent threat	DIOCKI	011, IVIA 02301	
BODILY INJURY COMMISSION	ON OF A FLIGHT	] WITH I	NOTICE to accused			
ONE OR MORE FELONIES, I reques	t a WITHOUT	WITH	H NOTICE to accused	ARREST ST	ATUS OF ACCUSED	
WARRANT is requested because pro	osecutor represents that accused m	ay not app	ear unless	X HAS H	AS NOT been arrested	
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NAME (FIRST MI LAST) AND ADDRES			RTH DATE	SOCIAL S	SECURITY NUMBER	
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			PCF NO. 5380712	MAF	RITAL STATUS Single	
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02301						
		GENDI		WEIGHT	EYES Brown	
HAIR RACE COMPLEX	(ION SCARS/MARKS/TATTOOS	Male BIRTH 9	STATE OR COUNTRY	150	AY PHONE	
Brown Hispanic Mediur		DIKITI	DR	"	AT PHONE	
EMPLOYER/SO	CHOOL	MOTH	HER MAIDEN NAME	FAT	HER'S NAME	
	CASE INFOR	MATION	C N C			
COMPLAINANT NAME (FIRST MI LAST)	CASE INFOR	WATION	COMPLAINANT	TYPE	PD	
		X P	OLICE CITIZEN	OTHER	M.S.P.	
Trooper Paul Martin				OF OFFENSE		
ADDRESS State Police Middleboro				EET, BROCKTON, MA		
326 West Grove Street			DENT REPORT NO.	TSD	OBTN TSDH201901814	
Middleboro, MA 02346			CITA	TION NO(S)		
			See Offense Descr		Citation #	
		TION #: 34		OFFENSE		
4 90-24-E NE VARIABLES (e.g. victim name, contr	EGLIGENT OPERATION OF MOTO				3/26/2019	
VARIABLES (e.g. Victim name, conti	olled substances, type and value of	property.	other variable informatio	n, see Complaint	Language Manual/	
OFFENSE CODE CI	HARGE DESCRIPTION CITA	TION #: 34	14003AA	OFFENSE	DATE	
5	ENTIFY SELF, MV OPERATOR RE		- 41 1- 1- 1- f 41-		3/26/2019	
VARIABLES (e.g. victim name, contr	olled substances, type and value of	ргорепу. с	otner variable informatio	n; see Complaint	Language Manuai)	
OFFENSE CODE CI	HARGE DESCRIPTION CITA	TION #: 34	14001AA	OFFENSE	DATE	
	OP FOR POLICE, FAIL				03/26/2019	
VARIABLES (e.g. victim name, contr	olled substances, type and value of	property.	other variable informatio	n; see Complaint	Language Manual)	
REMARKS		CO	MPLAINANT'S SIGNAT	URE	DATE FILED	
	LTUIS COMPLAINT APPLICATION					
	N THIS COMPLAINT APPLICATION THE ABOVE COURT ADDRESS O		DATE OF HEARING	AT TIME O	F HEARING	

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT US	E ONLY)	Page 3 of 3	TRIAL COURT OF MASSACHUSETTS DISTRICT COURT DEPARTMENT			
I, the undersigned complainant, request that a criminal complaint issue against the accused charging the offense(s) listed below. If the accused HAS NOT BEEN ARRESTED and the charges involve:					Brockton DC 215 Main Street Brockton, MA 02301		
ONLY MISDEMEANOR(S), I request a	hearing WITHOUT NOT	TICE becau	use of imminent threat	Dioditon,	1417 ( 0200 )		
BODILY INJURY COMMISSIO	N OF AFLIGHT [	WITH	NOTICE to accused				
ONE OR MORE FELONIES, I request	a WITHOUT	WITH	NOTICE to accused	ARREST STATU	S OF ACCUSED		
WARRANT is requested because pro	secutor represents that accused m	ay not app	ear unless	X HAS HAS	NOT been arrested		
	INFORMATION AB	OUT AC	CUSED				
NAME (FIRST MI LAST) AND ADDRESS	:	BI	RTH DATE	SOCIAL SEC	URITY NUMBER		
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			PCF NO. 5380712		AL STATUS Single		
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02301		·					
		GEND		WEIGHT	EYES		
	O	Male		150	Brown		
HAIR RACE COMPLEXI Brown Hispanic Medium	ON SCARS/MARKS/TATTOOS	BIRTH	STATE OR COUNTRY DR		PHONE		
EMPLOYER/SCI	HOOL	MOTI	HER MAIDEN NAME	FATHER	R'S NAME		
	CASE INFOR	MATION	U	The second	X-1		
COMPLAINANT NAME (FIRST MI LAST)			COMPLAINANT	TYPE	PD		
Trooper Paul Martin		X P	OLICE CITIZEN	OTHER	M.S.P.		
ADDRESS				OF OFFENSE	.		
State Police Middleboro				ET, BROCKTON, MA			
326 West Grove Street		INCI	DENT REPORT NO.	OBTN TSDH201901814			
Middleboro, MA 02346			CITA	TION NO(S)			
				iption Below for Citat	ion#		
OFFENSE CODE CH	ARGE DESCRIPTION CITA	TION #:		OFFENSE DAT	TE		
	RRANT/FELONY				6/2019		
VARIABLES (e.g. victim name, contro WR5258595TC/1618CR001756	lled substances, type and value of	property.	other variable information	n; see Complaint Lan	guage Manuai)		
THE SECOND CONTRACTOR OF THE SECOND CONTRACTOR							
					-		
REMARKS		CO	MPLAINANT'S SIGNAT	URE DAT	TE FILED		
	THIS COMPLAINT APPLICATION HE ABOVE COURT ADDRESS O		DATE OF HEARING	TIME OF HE	EARING		

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT USE ONLY)	Page 1 of 3	TRIAL COURT OF MASSACHUSETTS DISTRICT COURT DEPARTMENT
The undersigned alleges the following as a of the factual basis for the offense(s) for wh			
By Trooper Paul L Martin #3646			
Arrest - Valdesaviles			
Brockton. I was in a fully marked heard the sound of a vehicle acce paved roadway. These sounds we Odyssey turn onto Fuller street st so fast. That vehicle then passed	of 19 at approximately 2210 hours I d State Police cruiser #811 and parelerating very quickly. Simultaneous ere coming from the area of Belmostill driving at a high rate of speed amy cruiser parked in the funeral hergency lights and sirens and attention 7XC119.	trolling on Fuller usly I also heard ont Street. I then and squealing the ome parking lot.	Street, a public way, when I the squealing of tires on the observed a Gray Honda tires from taking the corner I then got out behind the
driveway at 30 Fuller Street and he was then handcuffed, pat/frisk the vehicle who stated they lived operator stated he was operator spoke primarily Spanish wallet that was in his back right stating he was for an international drivers licens	but did speak some English.The pocket. The first identification was DOB	e cruiser, directe ny cruiser. There sked for weapons revealed no rest operator did have s a Dominican Ro he second identif	d the operator to the ground, were two other occupants in and allowed to leave. The alts for a drivers license. The two picture identifications his epublic Identification card fication was a translation card DOB I attempted to
to Stop for Police. The vehicle whe was given a copy of the Miran	the was being arrested for Unliced yas towed and he was transported to and rights in Spanish. He took a fe p and down. I took that as he under	to SP Middlebord w minutes to rea	o for booking. Once in booking d over it and then gave me a
identity. Fingerprint results rever falsely assumed this identity as t revealed a WMS warrant # Fraud, Witness Intimidation, Fal Negligent Operation of Motor V	he RMV photo did not match this	prisoner. Further ct Court for Unli- icense, Possess to I Motor Vehicle	. It also revealed he rinquiry into censed Operation, Identity Distribute Class B Drug, Operator Refuse to Identity
	was charged with Unor Police(90-25), MV Operator Re Operation of Motor Vehicle(90-16	efuse ID(90-25),	Arrestee Furnish False

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT USE ONLY)	Page 2 of 3	TRIAL COURT OF MASSACHUSETTS DISTRICT COURT DEPARTMENT
The undersigned alleges the following as a of the factual basis for the offense(s) for wh	<u> </u>		

APPLICATION FOR CRIMINAL COMPLAINT	APPLICATION NO. (COURT: US	SE ONLY)	Page 3 of 3		OF MASSACHUSETTS DURT DEPARTMENT		
The undersigned alleges the following as a	X full or partial state	ment					
of the factual basis for the offense(s) for which a criminal complaint is sought							
PRINTED NAME	SIGNATURE		ORCEMENT OFFI		DATE SIGNED		
ADDITIONAL FACTS FOUND							
REMARKS	SIGNATURE OF CLERK-MAGI	STRATE / ASST.	CLERK / JUDGE	DATE SI	GNED		

COURT COPY



# **State Police Middleboro**



		Cell #:
Case Number: Arresting Officer:	3646 - Trooper Pa	aul Martin
Booking Officer:	-	
		Prisoner Property Inventory
	Currency	Jewelry
Coin Value:	.61	
Bill Value:	3.00	
		Clothing
		Miscellaneous Items
wallet, 2 cell phor	nes, belt	
This is an	accurate inventor	y of my property which is being held by the Massachusetts State Police for safekeeping.
Prisoner's Signat	ure:	Booking Officer's Signature:
Prisoner Transpo	rted To:	Property Turned Over to Officer:
	I certify t	hat all of the above property was returned to me on:
Date:		Time:
Prisoner's Signat	ture:	Signature of Returning Officer:



# **State Police Middleboro**



		Cell #:
Case Number:  Arresting Officer: 3646 - Trooper Paul Martin  Booking Officer: -		
Suicide Preventi	on Checklist	
Have you taken any medication(s) or drugs recently?	<u>N</u>	
If yes, what type(s) of medication(s) or drugs have you taken?		
Have you ever been under psychiatric care?	N	4
When?		
Why?		
Have you previously attempted suicide?	<u>N</u>	
How?		
Where?		
When?		
Are you contemplating suicide?	<u>N</u>	
How?		
Where?		
When?		
Action Taken		
Officer Signature:	Officer ID#:	



# **NEW YORK STATE INTELLIGENCE CENTER**

31 Tech Valley Drive, Second Floor, East Greenbush, NY 12061 Phone: 866-48-NYSIC (866-486-9742) Fax: (518) 786-9398

Request for Information Form								
REQUESTOR INF	ORMATION							
Requestor Name	Shannan Barton			Duty/Title	Intelli	Intelligence Analyst		
Agency	Massachusetts State Po	olice		State	MA			
Email	fusion@massmail.stat	e.ma.us	Phone	(978) 451-	3700	ORI:	MA	MSPF000
JUSTIFICATION								
Case #	Crime	Type Frau	d/lmpc	oster	Status	Acti	ve C	riminal Inv
SUBJECT / ADDR	ESS INFORMATION (For	multiple su	bjects o	r addresses, p	lease u	se next p	age.)	
Name		DOB				R	ole	Suspect
Address		City				St	ate	
SSN		Licen	se#			St	ate	NY
VEHICLE INFOR	MATION (For multiple ve	hicles, please	use ne	ct page.)				
Year	Make	Mod	lel			Color		
Plate	State	VIN				Role		
PHONE INFORMA	ATION (For multiple phon	es, please us	e next p	age.)				
Туре	Number			Role				
BUSINESS INFOR	MATION (For multiple bu	ısinesses, plo	ase use	next page.)				
Name		Ov	vner			Role	, Y	
Address		Sta	ite					
INFOR	MATION REQUESTED			ASSIST	ANCE	REQUES	M N DID	Name and Address of the Owner, where
Address History	LPR Checks			ial Recognition				/ Time Line
✓ Arrest / Booking				ial Media Che	ecks			equest
Associates / Rela			Tol	l Analysis		Other	(Des	cribe Below)
Phone / Contact	Info Other (Descri	ibe Below)						
OTHER (Use secon	nd page if necessary)		CASE D	ETAILS (Use	e second	page if	neces	sary)
			Suspec	t in a Fraud I	nvestig	ation.		



## **NEW YORK STATE INTELLIGENCE CENTER**

31 TECH VALLEY DRIVE, SECOND FLOOR, EAST GREENBUSH, NY 12061 PHONE: 866-48-NYSIC (866-486-9742) FAX: (518) 786-9398

# **Request for Information Form (continued)**

Name		DC	DB Licens	e # / SSN Addres	SS	Role
ZEHICLE IN	FORMATI	ON		PHONE I	NFORMATION	
Plate / VIN	State	Role		Туре	Number	Role
BUSINESS IN	FORMAT	ION				
Name			Owner	Address		Role
ABDITIONA	INFORM	ATION				
ADDITIONA	L INFORM	IATION				
ADDITIONA	L INFORM	ATION				
ADDITIONA	L INFORM	ATION				
ADDITIONA	LINFORM	IATION				

## COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

## DISTRICT COURT DEPARTMENT

## AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT G.L. c. 276, §§ 1 to7; St 1964, c. 557

May 10, 2019

## AFFIDAVIT OF TROOPER CRISTINA J LUCIN

I, Trooper Cristina J. Lucin, being duly sworn, do depose and say under the pains and penalties of perjury that the following is true to the best of my knowledge:

## BACKGROUND OF THE AFFIANT

- I, Cristina J. Lucin, am a Massachusetts State Trooper, presently assigned to the Fraud Identification Unit, sub-unit of the Division of Homeland Security and Preparedness. I have been a Massachusetts State Trooper since my graduation from the Massachusetts State Police Academy in March 2012. While attending the State Police Academy in New Braintree, MA, I received specialized training in criminal investigations. Prior to my current assignment, I was assigned as the Chief of Staff to the Deputy Superintendent of the Massachusetts State Police. Prior to serving as the Deputy's Chief of Staff, I was a uniformed Trooper in the Department of Field Services as a Patrol Trooper in Holden, MA and Boston, MA. I possess a Bachelor's Degree (B.S) in Criminology from Merrimack College (2010) and an Associate's Degree (A.S) in Cybersecurity from Bunker Hill Community College (2018). In 2017 I also earned my A+ certification through CompTIA industries (Computing Technology Industry Association).
- 2. My current assignment with the Fraud Identification Unit began in August 2017. Since that time, I have investigated hundreds of cases involving Identity Fraud, Document Fraud, and Benefit Fraud at the state and local level. The Fraud Identification Unit is co-located within the Massachusetts Registry of Motor Vehicles (RMV) enforcement services office. Many of our cases involve the use of Facial Recognition Technology to identify suspect identities

within the Commonwealth of Massachusetts. The unit also investigates document fraud occurring within the Registry of Motor Vehicles licensing and vehicle registration division, as well as RMV employee corruption and theft cases.

- 3. I am also currently assigned to the Federal Document and Benefit Fraud Task Force (DBFTF) out of Boston. The DBFTF includes Homeland Security Investigations, Department of State, Office of the Inspector General, Office of Housing and Urban Development, Office of Health and Human Services, and several other local and state agencies. This task force focuses on document and benefit fraud perpetrated in Massachusetts and works in conjunction with the U.S Attorney's Office in Boston to prosecute these individuals criminally.
- 4. I have completed the following computer security and specialized law enforcement trainings:

2015: National White-Collar Crime Center (NW3C) Basic Data Recovery and Analysis (BDRA)

2016; NW3C Social Media Investigations and Open Source Investigations

2016: NW3C Basic Network Intrusion Investigations (BNII)

2016: National Cyber Crime Conference (NCCC)

2017: NCCC

2018: The Reid Technique Interviewing and Interrogation

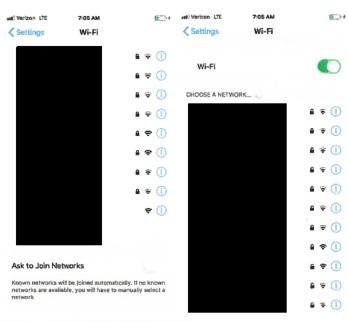
- 5. Prior to my employment as a Massachusetts State Trooper, I was employed by the United States Coast Guard. I served as an Operations Specialist, first class out of Coast Guard Sector Boston. During my time in the Coast Guard, I participated in numerous law enforcement activities including vessel security screenings, narcotics interdiction cases, and human and goods smuggling investigations.
- 6. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other troopers, law enforcement officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

## **CLASSIFICATION OF SEARCH**

that th	e property described below:
[X]	has been stolen, embezzled, or obtained by false pretenses.
[ X ]	is intended for use for or has been used as the means of committing a crime.
[ ]	has been concealed to prevent a crime from being discovered.
[ ]	is unlawfully possessed or concealed for an unlawful purpose.
[ X ]	is evidence of a crime or is evidence of criminal activity.
[ ]	as otherwise specified
DESC	CRIPTION OF THE PLACE TO BE SEARCHED
I am s	eeking the issuance of a warrant authorizing the search of apartment of the residence
locate	d at 02169. Being more fully described as follows: The
ргоре	rty is a multi-unit Apartment Complex with several buildings containing individual units.
The b	uildings are three stories and identified by different letters. The building to be searched is
Build	ing, on the third floor of Building The exterior of the apartment building is a
tan co	lor with white trim, and red/reddish brown doors. The interior of building F is white, and
	dual unit doors are also white with gold trip and golden numbers indicating the unit on the of the door.
There	is a call box on the exterior door with a name and number listing individual units in the

Based upon the information contained or referenced herein, there is probably cause to believe

building. The call box directory lists the name for unit The mailboxes are metal and key operated, and both the names and are present on the metal mailbox assigned to Also included are screenshots of available wireless networks outside of









## **DESCRIPTION OF ITEMS TO BE SEARCHED AND SEIZED**

This affidavit is in support of a search warrant to search for and seize the following items: All "Computer Systems," including, but not limited to:

- i. Desktop-type personal computers
- ii. Laptop or Notebook-style computers
- iii. Mobile or Hand-held devices including but not limited to:
  - (1) Cell phones
  - (2) SmartPhones
  - (3) Tablets
- Electronic network components, including but not limited to, MiFi components, WiFi components, routers, servers, and data storage systems.
- Cloud-based systems and data storage components connected to or integrated with items i though iii above.
- vi. Computer Data Storage and Retrieval Devices and Media (which can, depending upon device, serve as an input and/or an output device), including, but not limited to:
  - (1) Diskettes
  - (2) Compact Disks
  - (3) Digital Video Disks (DVDs)
  - (4) USB Flash Drives
  - (5) External Hard Disk Drives
  - (6) Cloud-based data storage
- vii. Computer System Documentation, including, but not limited to:
  - (1) Operating System and Application programming disks, CD-ROMs, etc.
  - (2) Programming and Applications manuals, books or brochures.
- (3) Peripheral devices capable of capturing and transmitting digital images or video (e.g.: web cameras.)
- viii. Notations of screen names or email address(es), computer access codes, passwords and/or protocols, whether stored or recorded electronically on diskette, etc., or non-electronically on paper, in a book, etc.
- ix. Any information including letters, mail, notes, receipts, bills, etc. relating to the control or ownership of the "computer systems" and the area of its location.

And with regard to such "Computer Systems" to transport the same to a secure location and there to SEARCH therein for and SEIZE;

a. Computer data files, records, and logs associated with any of the above described files which may identify, trace, or record the facts, including, but not limited to the date, time, modification, alteration, transmission or receipt via the Internet or other networks of any of the computer files described above, including, but not limited to file menus, Internet browser history, cache directories, registry entries, logs, and files

- b. Computer data files including, but not limited to metadata, records, and logs associated with any of the above described files which may identify, trace, or record the facts, including but not limited to the date, time, modification, alteration, transmission or receipt via the Internet or other networks of any of the computer files described above, including but not limited to file menus, Internet browser history, cache directories, registry entries, logs, and files.
- c. Any installed computer application software and any related data files that will be necessary to detect and/or access and read any of the computer files or applications described above.
- d. The directory and file structure of each computer system and storage medium described above.
- e. Any computer file or data demonstrating the access to, control of and/or creation of any
  of the above files or applications and the date and time of such access or creation

I am also requesting that the court authorize the search and collection of the following

## **DOCUMENTARY EVIDENCE** related to this case:

- a. Documents, records, etc., which are evidence and fruits of certain Massachusetts General Law (M.G.L.) Chapter 266 and Chapter 90 fraud statutes, sought from an operation which was completely "permeated with fraud"
- Documents, papers, receipts, and other writings which are evidence of a conspiracy to commit identity fraud, document fraud, and/or financial fraud.
- c. Representative handwriting samples
- d. "Papers" indicating the ownership or occupancy of 15 Bower Rd F12 Quincy, Massachusetts
- e. All checkbooks, cancelled checks, deposit slips, bank statements, trust account receipts, check stubs, books and papers, etc., which would tend to show a fraudulent intent or any elements of the crime of false pretense or embezzlement.
- f. Any and all identification cards, driver's licenses, driving permits, passports, or other photo identification which are evidence or fruits of the above described crimes.

## TECHNICAL DEFINITIONS

- 7. As used herein, the following terms have the following meanings:
  - a. An Internet Protocol (IP) address is the globally unique address of a computer or other device connected to a network, and is used to route Internet communications to and from the computer or other device.
  - b. A "session" refers to a limited time of communication between two systems. Some sessions involve a client and a server, while other sessions involve two personal computers.

c. An "ISP" refers to an Internet service provider, which is a company that provides customers with Internet access. Data may be transmitted using several technologies, including dial-up, DLS, cable modem, wireless or dedicated highspeed interconnects.

## PROBABLE CAUSE

- 8. On Monday, April 22<sup>nd</sup>, 2019, I was informed of potentially fraudulent activity within the Registry of Motor Vehicles (RMV) computer systems. RMV enforcement services had taken a call from a customer on April 19<sup>th</sup> who had a suspended Massachusetts License. The customer identified themselves as (DOB: resides at and stated that his license had been suspended due to a bad check.

  Turther stated that he had received an e-mail that his myRMV account information had been changed, but he himself did not make those changes.
- 9. "myRMV" is a customer portal for the RMV which allows for over 40 transactions that can be completed online by a customer. If a customer needs to visit the RMV, myRMV will allow a customer to "Get Ready Online First" and potentially shorten their visit and wait times at any RMV branch location.
- 10. Enforcement Services reviewed ZHU's account and discovered that an online myRMV account had been created on April 6th, 2018. On this date, an individual utilized the myRMV account portal, entered ZHU's name, date of birth, full social security number, and residential zip code. An e-mail address of account portal was added as the

authentication method. No other activity was present on the record until November 28th,
2018. On November 28th, 2018, someone other than gained access to the myRMV
account, changed the mailing address to
a duplicate license. The replacement license is commonly referred to as a "Duplicate" costs
25 dollars. The duplicate request was paid for when the suspect entered routing information
for EAST WEST BANK and an account number as an "eCheck" payment. myRMV provided
confirmation of the transaction, showing a successful purchase of the duplicate license.
Several days after this transaction, the eCheck bounced and
due to BAD CHECK PAYMENT of 25.00 to the registry.

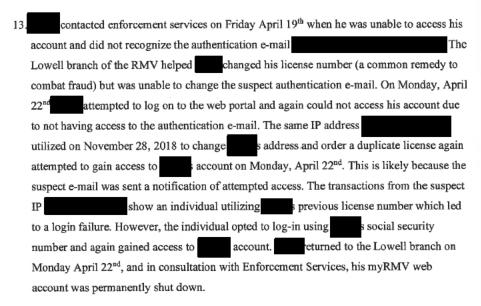
- 11. When a myRMV account is configured via the web portal, a customer must select an authentication method. Two-factor authentication (2FA) is an additional layer of protection utilized by online services to verify an individual's identity. myRMV allows a user to select 2FA with a phone number or e-mail address. When the myRMV account belonging to was created, an authentication e-mail was provided:

  The provided of that e-mail address, nor had he utilized that e-mail address at any time. On November 28, 2018, the day the duplicate license was ordered the authentication e-mail was changed to

  On December 24, 2018, the authentication e-mail was changed to

  was asked if either of those e-mails belonged to him and he stated that he had never utilized those e-mails.
- 12. Several IP addresses are associated with "sessions" which represent different connections between this user account and the myRMV system. The myRMV system contains licensing and vehicle registration data for the entire RMV database. The following IP addresses were utilized on ZHU's account:
  - a. April 06, 2018b. June 14, 2018c. June 14, 2018
  - d. November 28, 2018 (5 Sessions)
  - e. December 04, 2018
  - f. December 04, 2018





14. RMV Enforcement Services contacted ATLAS support services in order to ascertain if the suspect e-mail addresses

had been utilized in any other transactions. ATLAS is the main system of record utilized by RMV employees to license and manage driver accounts, non-driver accounts, and other customers utilizing RMV services. ATLAS support services consist of IT professionals who manage the data behind ATLAS belonging to all RMV customers. The database was queried and two of the suspect e-mails revealed thirty-one (31)

customer accounts associated w	with various if addresses.
A query of	revealed nine (9) customer accounts associated with this
address. Additionally,	has at least 10 unique IP addresses associated
with this e-mail address, and	has at least 17 unique IP
addresses identified via ATLAS	š.
Analysis of IP Addresses Associa	ted with Suspect Accounts
15. I utilized the IP lookup tool ca	lled "WHOIS" to identify the ISP. Most IP owner
information is publicly accessit	ole utilizing IP lookup tools. The query for e-mail address
had 1	7 unique IP addresses associated with unique sessions. The
query for e-mail address	had 11 unique IP addresses associated with
unique sessions. Two IP Addre	sses are associated with both e-mail addresses
	A subpoena was submitted to COMCAST Internet
Service Provider (ISP) on Apri	122 <sup>nd</sup> , 2019 by the Massachusetts Attorney General's Office
for the following four IP address	sses/dates that were associated with these suspect transactions
a. ET.	gned from 12/20/2018 at 08:26 EST to 03/23/2019 at 08:52
	gned on 12/07/2018 at 05:27 EST and on 04/17/2019 at 08:46
c. and on 01/22/2019	med on 11/18/2018 at 23:37 EST, 11/19/2018 at 13:30 EST, at 07:39 EST.
	med on 04/17/2019 at 05:38 ET.

assigned from 12/20/2018 at 08:26 EST to 03/23/2019 at 08:52 ET:



Legal Response Center 1800 Bishops Gate Boulevard Mount Laurel, NJ 08034 865-947-8572 Tel 865-947-5587 Fax

## CONFIDENTIAL

April 24, 2019

Lilian <u>Hitzky</u>
Massachusetts Attomey General's Office
One Ashbutton Piace, 19th Floor
Boston, Massachusetts (MA) 02108

RE: Subpoena Comcast File #: Case #:

Dear Lilian Ilitzky:

E-mail User Ids:

The Subpoena received on 04-24-2019 with respect to the above referenced matter has been forwarded to the Legal Response Center for a reply. The Subpoena requests Comcast to produce certain subscriber records pertaining to the following IP Address: ssigned from 12/20/2018 at 08:26 EST to 03/23/2019 at 08:52 ET.

Based on the information provided pursuant to the Subpoena, the subscriber information obtained is provided below:

Subscriber Name:
Service Address:

Bill to Name:
Telephone #:
Type of Service:
Account Number:
Start of Service:
Account Status:
P Assignment:
Current IP:
See Attached

If you have any questions regarding this matter, please feel free to call 866-947-8572.

Very Truly Yours, Comcast Legal Response Center

b. assigned on 12/07/2018 at 05:27 EST and on 04/17/2019 at

08:46 ET:



Legal Response Center 1800 Bishops Gate Boulevard Mount Laurel, NF 08054 866-947-8572 Tel 866-947-5587 Fax

## CONFIDENTIAL

April 24, 2019

Lilian Ilitzky Massachusetts Attomey General's Office One <u>Ashburton</u> Place, 19th Floor Boston, Massachusetts (MA) 02108

RE:	Subpoena Comcast File #: ]
	Case #:

Dear Lilian Ilitzky:

The Subpoena received on 04-24-2019 with respect to the above referenced matter has been forwarded to the Legal Response Center for a reply. The Subpoena requests Comcast to produce certain subscriber records pertaining to the following IP Address:

12/07/2018 at 05:27 EST and on 04/17/2019 at 08:46 ET.

Based on the information provided pursuant to the Subpoena, the subscriber information obtained is provided below:

Subscriber Name:
Service Address:

Telephone #:
Type of Service:
Account Number:
Start of Service:
Account Status:
IP Assignment:
Current IP:
E-mail User Ids:

High Speed Internet Service
Active
Dynamically Assigned
See Attached

If you have any questions regarding this matter, please feel free to call 866-947-8572.

assigned on 11/18/2018 at 23:37 EST, 11/19/2018 at 13:30 EST,

and on 01/22/2019 at 07:39 EST:



Legal Response Center 1800 Bishops Gate Boulevard Mount Laurel, NJ 08054 866-947-8572 Tel 866-947-5587 Fax

## CONFIDENTIAL

April 24, 2019

Lilian <u>Bitzky</u>
Massachusetts Attomey General's Office
One <u>Ashburton</u> Place, 19th Floor
Boston, Massachusetts (MA) 02108

RE: Subpoens

Comcast File #: LCR408457,60-61 Case #: AS-CT-19-CWKSUB042319

Dear Lilian Ilitzky:

The Subpoena received on 04-24-2019 with respect to the above referenced matter has been forwarded to the Legal Response Center for a reply. The Subpoena requests Comcast to produce certain subscriber records pertaining to the following IP Address:

11/18/2018 at 23:37 EST, 11/19/2018 at 13:30 EST, and on 01/22/2019 at 07:39 EST.

Based on the information provided pursuant to the Subpoena, the subscriber information obtained is provided below:

Subscriber Name: Service Address:

Telephone #: Type of Service: Account Number:

High Speed Internet Service

Start of Service:

Unknown

Account Status: IP Assignment: E-mail User Ids: Disconnected 01/31/2019 Dynamically Assigned

If you have any questions regarding this matter, please feel free to call 866-947-8572.

## assigned on 04/17/2019 at 05:38 ET:



Legal Response Center 1800 Bishops Gate Boulevard Mount Laurel, NJ 08054 866-947-8572 Tel 866-947-5587 Fax

## CONFIDENTIAL

April 24, 2019

Lilian Ilitzky Massachusetts Attomey General's Office One Ashburton Place, 19th Floor Boston, Massachusetts (MA) 02108

Subpoena Comcast File #: Case #:

Dear Lilian Ilitzky:

The Subpoena received on 04-24-2019 with respect to the above referenced matter has been forwarded to the Legal Response Center for a reply. The Subpoena requests Comcast to produce certain subscriber records pertaining to the following IP Address: assigned on 04/17/2019 at 05:38 ET.

Based on the information provided pursuant to the Subpoena, the subscriber information obtained is provided below:

Subscriber Name: Service Address:

Telephone #: Type of Service:

High Speed Internet Service

Account Number: Start of Service:

Unknown

Account Status: IP Assignment:

Active

Dynamically Assigned See Attached

Current IP:

E-mail User Ids:

If you have any questions regarding this matter, please feel free to call 866-947-8572.

<ol><li>Based on the results provided from COMCAST, my office generated a list o</li></ol>	f myRMV
accounts connected to the above four addresses:	



18. A query through the RMV ATLAS system revealed additional compromised records based on the above IP addresses:

a.		
	i.	138 associated customer accounts
b.		
	i.	4 associated customer accounts
c.		
	i.	108 associated customer accounts
d.		
	i.	16 associated customer accounts

19. In addition to the above IP addresses and physical addresses, the following IP addresses were located on the affected myRMV accounts and show signs of the same fraudulent activity.

The owner and lessee of these IP addresses are still under investigation:

a. (155 customer accounts)
b. (122 customer accounts)
c. (16 customer accounts)

20. In addition to the above IP addresses, the following electronic mail addresses were associated with fraudulent customer transactions. A subpoena and preservation order is pending to determine the owner/location information associated with these e-mail addresses:





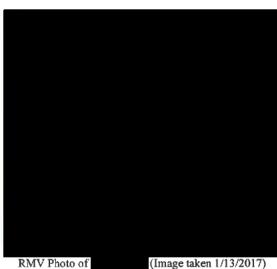
21. The above lists above are not exhaustive. At this time, the Fraud Identification Unit suspects that over 200 individual accounts have been compromised. This information was gathered via IP address searches, suspect e-mail searches, and physical address searches utilizing the information gathered in this case.

## ACTIVITY AT

- 22. The subpoena request above identified as the physical address associated with logical IP address for the given dates and times of suspect transactions. A total of 138 associated customer accounts and over 400 unique sessions were identified from the period of time between July 2018 and present.
- 23. Compromised accounts were differentiated from victim accounts by the activity on the records. The accounts where customer information was changed was considered victim accounts. Some of these victims have had changes of mailing address, and duplicate or renewal licenses mailed to their own address or another address added by the suspect.
- 24. I identified 21 victim accounts where a bad payment was present on the myRMV record. "Bad Payment" represents a payment for RMV services made through myRMV that was returned or "bounced". On these 21 records, a bad payment was made in the form of "eCheck" or Electronic Check. An electronic check is an electronic version of a paper check used to make payment online. To make a payment with an eCheck, a customer needs to provide the following information:
  - a. Bank routing number
  - b. Bank account number
  - c. Name on your bank account

- 25. The Registry of Motor Vehicles offers two ways for customers to pay for online transactions: eCheck or credit/debit card. All 21 victims referenced above had a replacement license ordered from myRMV paid for via eCheck. The Massachusetts RMV does not require the user to provide the name on the bank account when an eCheck is submitted. Instead, the user of a myRMV account only needs to provide routing number and account number. If a transaction is successful, the user is provided with a confirmation page and the pending replacement license request is initiated. Replacement licenses should be delivered within seven to ten business days.
- 26. One of the customer accounts linked to the IP address

  02169. This is the current RMV mailing
  address and self-identified address (see paragraph 27) of [DOB:



can be described as a young Asian male, approximately 5 feet and 8 inches tall, with a medium to heavy build.

lists as mailing address via the Registry of Motor Vehicles. The same address is listed as his residential address beginning January 13<sup>th</sup>, 2017 until November 19<sup>th</sup>, 2018, when it is changed to is the address of a commercial business

	known as "Crystal Foot Care". also has one vehicle registered with the same
	residential/mailing information: a 2014 Range Rover Sport Utility Vehicle with registration
	number "IC58MM".
27.	A police report obtained from Norwood Police identifies
	as of October 31st, 2018. On this date, Norwood police
	interviewed in reference to fraudulent purchases made at the Jaguar
	and Land Rover dealership in Norwood, Massachusetts. According to the report, an
	reported to Norwood Police that she was the
	victim of identity fraud.
	utilized at the Jaguar and Land Rover dealership on 449 Neponset Street in Norwood.
	Jaguar/Land Rover provided the investigating officers with an invoice showing a purchase of
	one oil filter and brake kit for a total of \$476.75. The name on the vehicle account was
	with a given address of
	2018 told Norwood detectives that he resided at with his parents.
28.	On April 30 <sup>th</sup> , 2019 at 1650 hours, May 1 <sup>st</sup> , 2019 at 0530 hours, May 1 <sup>st</sup> , 2019 at 1031 hours,
	and May 7th at 1700 hours, the 2014 white Range Rover registered to was
	observed by Troopers in the Fraud Identification Unit parked outside the building identified
	as
	<del></del>

## MOTIVE AND MEANS FOR OBTAINING RMV/DMV CREDENTIALS

- 29. Based on my training and experience within the Fraud Identification Unit, I have identified various motives for those seeking to fraudulently obtain a Massachusetts issued Driver's License, Learner's Permit, Identification Card, or Liquor ID. Some of those motives include:
  - a. Right to drive/operate a motor vehicle both State and Federally
  - b. Establishes legal residency status within a state or federally
  - c. Identification necessary to open banking/checking accounts
  - d. "Clean" identity to cover up extensive criminal history or arrest warrants
  - e. Right to travel via bus, train, or airplane within the United States

- f. Human trafficking/smuggling operators seeking valid identities to conceal victims from Law Enforcement
- 30. The bad check/returned eChecks present on victim records demonstrate a utilization of fraudulent financial means to obtain these credentials. In addition to bad checks, customers have reported having credit cards opened in their names and without their authorization as well as credit report alerts of activity associated with addresses other than their own. The investigation to date has led to bad checks from the following financial institutions: Bank of America, J.P. Morgan Chase, and T.D. Bank.
- Bank of America checking account. Several victims whose information was compromised via myRMV also have been identified as victims through Bank of America's fraud detection services. (SEE ATTACHMENTS FOR BANKING DOCUMENTS). Bank of America also identified the IP address as one utilized by to commit "Check Kiting". "Check Kiting" fraud is committed against a banking institution by accessing deposited funds in one account before they can be collected from another account upon which they are drawn. This scheme involves several different banks or financial institutions and is accomplished when a bank deposits accessible money into an account while waiting for cash to be processed from an account at another bank when in actuality; the other account holds no money.
- 32. Bank of America Investigators provided detailed banking records showing that been observed on ATM surveillance depositing a bad check. The following images were provided by Bank of America and show depositing a fraudulent check into his personal checking account. Note that the check is also endorsed by



12/30/2018 02:10:34.92 MU ATM TMAM1522 IP Surveillance North-Quincy-141103



12/30/2018 02:09:58.40 MU ATH IMMM1522 IP Surveillance North-Quincy-141103



ENTITY: NME
ACCOUNT:
PG\$: 006
CUSTOMER:

CONSUMER/COMMUNITY
EXP DATE: 10/22 ISSUED: 10/05/18 REISSUED:

INQUIRY SEQ\$: 0028

INQUIRY SEQ\$: 0028

TRANS TYPE : 12 CHK DEP
INQUIRY SEQ\$: 0028

TRANS TYPE : 12 CHK DEP
INQUIRY SEQ\$: 0028

TRANS TYPE : 12/50/16 02:10

CARD EXP DATE/TIME: 1

fraudulent activity on their myRMV accounts to the RMV Enforcement Services office.

Their myRMV accounts were shut down in November of 2018. An analysis of their records show that multiple sessions originating from IP address were conducted on their myRMV accounts with suspect e-mail

Bank of America provided information that

attempted to open up a bank account in as a card holder. The account lists the mailing address as which has been identified in this investigation as a possible drop address. The following information was provided by Bank of America and lists the client IP address as



34. Based on the facts above, I believe is utilizing the Personally Identifiable Information (PII) of other Massachusetts residents to commit Identity Fraud and Financial Fraud. The has utilized PII and fraudulent banking accounts to order and have delivered Massachusetts Driver's Licenses which aid in this fraud.

## ACTIVITY AT

35.	Of the 23 identified victims with associated bad check payments to the Registry of Motor
	Vehicles, 10 individuals had their residential, mailing, or both residential and mailing address
	changed on their record. The address was changed to
	is a residential address in proximal to Wollaston beach. Those 10
	address changes originated from a session identified by IP address  This is
	the same IP address assigned to
	connected to was a duplicate license ordered and sent to on
	April 27th, 2019. The most recent internet activity connected to
	on April 27 <sup>th</sup> , 2019.
	on april 2017
36.	Based on my training and experience, Financial and Document Fraud perpetrators often
	attempt to hide their physical location to insulate themselves from law enforcement and other
	investigators. Because of this, they often have their fraudulent documents, identification
	cards, and checks/other information sent to an address other than the one they currently
	reside at. It is my belief that and potentially other involved parties
	have utilized as a physical drop address to conceal their criminal activity. A
	"drop address" refers to a physical or digital address which is used to collect tangible
	products that are bought illicitly, stolen, or requested.
	products that are bought frictity, stolen, or requested.
37	. In March of 2019, Quincy Police filed an Incident Report related to mail theft and identity
	fraud occurring in Quincy. On March 27th, 2019, Detective Tom Pepdjonovic completed an
	incident report identifying an Identity Fraud Suspect by the name of
	was observed by Detective Pepdjonovic over several months at various addresses where
	identity theft victims had mail sent:
	Detective Pepdjonovic confirmed that ented a room at street in
	over the past several months. Quincy Police, Braintree Police, and Norwood Police
	have all filed similar reports in which victims of identity fraud have reported mail being sent
	to addresses other than their own, or mail stolen from their mailbox.
	=
38	. This office is currently investigating the connection between
	On April 27th, 2019, Dong leparted on a direct flight from JFK International
	Airport to Fuzhou, China. There are several active warrants out of Dedham District Court

Commented [BC(1]: May need to identify the time frame of this activity

for sarrest for charges of	of Identity Fraud, C	redit Card Fraud,	Motor Vehicle charges,
and possession of narcotics. Whe	en	(Detailed	in paragraph 27) was
interviewed by Norwood Police i	n relation to credit	card fraud at the	Jaguar/Land Rover
Dealership in Norwood,	stated that	often took	s white Range Rover
for service. Norwood Police did r	not charge	v	vith credit card fraud,
but instead filed charges against	out of Dec	lham District Cou	art.

39. Since April 27th, 2019, this office has detected fraudulent activity continuing on victim's records. Specifically, the Fraud Identification Unit has identified five customer records accessed since April 27th, 2019. These customer accounts were authenticated via e-mail addresses

and

Those records were accessed on the following dates and times:



## INFORMED DELIVERY AND MAIL THEFT

40. Several victims of identity fraud connected to our investigation and connected to the investigations of Quincy Police, Braintree Police, and Milton Police claim that they were signed up for Informed Delivery. According to the United States Postal Service, informed delivery is "a free and optional notification service that gives residential consumers the ability to digitally preview their letter-sized mailpieces and manage their packages scheduled to arrive soon. Informed Delivery allows users to view what is coming to their mailbox on a computer, tablet or mobile device. To automate the sortation and delivery of mail, the United States Postal Service (USPS) digitally images the front of letter-sized mailpieces that run through automation equipment. USPS is now using those images to provide digital notifications to users in advance of the delivery of physical mail.

- 41. The Massachusetts State Police Fraud Identification Unit has worked another case in conjunction with the USPS Mail Inspectors in which informed delivery was utilized to aid criminals in stealing mail from an individual's mailbox without their knowledge. The evidence gathered in this case shows that Informed Delivery is likely one method being used by a suspect or suspects to conceal the fruits of the fraud they commit. Specifically, as it relates to fraudulent license duplicate orders, a suspect or suspects is utilizing Informed Delivery to obtain Massachusetts Driver's Licenses fraudulently obtained without the knowledge of the home owner.
- 42. In addition to informed delivery, it is possible that the physical drop addresses utilized in this case belong to other individuals connected to the identity and financial fraud described above.

## USE OF COMPUTERS TO CONDUCT CRIMINAL ACTIVITIES

43. Based on my training and experience, I am familiar with the use of computers as an instrumentality in a crime, as creating contraband, or as containing contraband. I know that computer hardware, software, and electronic files may be important to a criminal investigation in two distinct ways: (1) the objects themselves may be contraband, evidence, instrumentalities, or fruits of crime, and/or (2) the objects may be used as storage devices that contain contraband, evidence, instrumentalities, or fruits of crime in the form of electronic data. I know that when an individual uses a computer to obtain unauthorized access to a server over the Internet, the individual's computer will generally serve both as an instrumentality for committing the crime, and as a storage device for evidence of the crime.

- 44. The computer is an instrumentality of the crime because it is used as a means of committing a criminal offense. In particular, the individual's computer is the primary means for accessing the Internet, communicating with the victim computer, and ultimately obtaining the unauthorized access that is prohibited by M.G.L. Chapter 266 Section 120F. The computer is also likely to be a storage device for evidence of crime because records and evidence relating to the crimes are stored on the computers for future use. Those records and evidence may include files that recorded the unauthorized access, stolen passwords, computer logs, individual's notes as to how the access was achieved, and other records that indicate the scope of the individual's unauthorized access. Criminal Procedure permits law enforcement to search for and seize computer hardware, software, and electronic files that are evidence of crime, contraband, instrumentalities of crime, and/or fruits of crime.
- 45. In this case, the warrant application requests permission to search and seize for evidence, likely digital and paper, related to the unauthorized access into the Registry of Motor Vehicles computer network and of illegal interceptions of Personally Identifiable Information (PII). This digital and paper evidence constitute both evidence of crime and contraband. This affidavit also requests permission to seize computer hardware and mobile devices that may contain evidence of computer intrusions and/or unauthorized access and of illegal intrusions of RMV data, if it becomes necessary for reasons of practicality to remove the hardware and conduct a search off-site. I believe that, in this case, the computer hardware and mobile devices are containers for evidence, containers for contraband, and also itself instrumentalities of the crime under investigation.
- 46. The primary purpose for requesting authorization to gain this information is for law enforcement to attain the goals of this investigation. The goals of this investigation continue to be to:
  - a. identify all locations from where any and all fraudulent electronic transactions originate;
  - b. identify perpetrators PII source(s);
  - c. identify other suspects and involved individuals deal with;
  - d. identify meet locations of other suspects or Persons of Interest (POI)
  - e. identify any financial institutions, which perpetrators might be utilizing to launder the proceeds from these fraudulent financial scams;

- f. Ultimately effect an arrest of any and all perpetrators for Chapter 266 M.G.L., and Chapter 90 M.G.L. violations.
- 47. Based upon my knowledge, training, and experience, I know that in order to completely and accurately retrieve data maintained in computer hardware or on computer software, to insure accuracy and completeness of such data, and to prevent the loss of the data either from accidental or programmed destruction, it is often necessary that some computer equipment, peripherals, related instructions in the form of manuals and notes, as well as the software utilized to operate such a computer be seized and subsequently processed by a qualified computer specialist in a laboratory setting. This is true because computer storage devices (such as hard disks, diskettes, tapes, compact disks, thumb drives, etc.,) can store the equivalent of thousands of pages of information. Additionally, a user may seek to conceal criminal evidence by storing it in random order with deceptive file names. Searching authorities are thus required to examine all the stored data to determine which files are evidence or instrumentalities of criminal activity. This sorting process can take days or weeks, depending on the volume of data stored, and it could be impractical to attempt this kind of data analysis "on-site."

# REASONABLE INFERENCES BASED ON TRAINING AND EXPERIENCE Request for Off-Premise Search

For the foregoing reasons, I request to search for the computer system(s) and associated storage medium more particularly described above and to transfer it to a secured law enforcement location where its contents may be forensically examined by qualified personnel in a manner best suited for the retrieval and preservation of all evidence.

## Transfer of Digital Files

I know that there are several methods by which files can be copied or transferred from one electronic storage device to another. Files are easily transferred from one device or piece of storage media (i.e. computer, storage disk, cell phone, digital camera) to another by saving to a disk (i.e. CD, DVD, or USB storage drive), transferring via a connecting cable (i.e. USB, firewire, etc.) to an external device, or through electronic transfer, such as email. I also know that nowadays files and/or communications can just as easily be accessed, stored, sent or

received using hand-held mobile devices like cellular telephones ("smartphones") as they can through a desktop or laptop personal computer.

#### The Ability to "Undelete" Files

When most computers store data, the operating software tells the CPU (central Processing Unit) to assign the data a "file" name (usually a pre-existing file name if it exists, or a name selected (via keyboard input by the user) and sends the data to a storage medium, typically either the "hard drive" of the computer, the floppy drive, or some other peripheral storage device such as a zip drive, tape drive, or writable compact disk (WCD). In order to manage the inventory of all stored files, many operating systems (such as most Windows operating systems) also maintain a "File Allocation Table" (FAT) which tells the CPU where all data is stored. The names (and actual locations of the data on the hard drive or other storage medium) are recorded in the FAT each time a "file" is saved, accessed, modified, transferred or otherwise affected. When a file is "deleted" by a user, the computer does not in fact remove its data from the designated storage medium, but instead, alters the FAT to indicate that the space previously consumed by that "deleted" data is now available to be overwritten with new data if necessary. Typically, space that is consumed by "deleted" data is not immediately overwritten. This fact is important in law enforcement since it means that so-called "deleted" files or data are, in fact, often still present on the computer's storage medium (i.e. floppy disk, hard drive, tape drive, etc.) and can be and has been recovered months, years, and even decades after their deletion if the integrity of the computer system is maintained. In my experience, it is not at all uncommon to be able to "undelete" deleted files or data years after their deletion date. As the capacity of computers to store data rises each year, the likelihood that previously "deleted" data has not yet been overwritten and is still recoverable also rises concurrently. The result is that evidence of a crime, stored in a computer system, may be recovered even after the passage of significant periods of time and, in some instances, even after a deliberate attempt to destroy it.

#### Cache Files

I further know that in the vast majority of computer systems, each time a file is received, transferred, modified, altered, or otherwise affected, the computer will make some form of a notation or record of that event either in a "log" of activity or by creating or modifying (at or

about the same moment in time) a file "associated" with the computer data file which witnessed the activity. For example, when files are received in most IBM-compatible systems using Microsoft Explorer as a software application to navigate the Internet, the file is loaded into a "Temporary Internet" directory and/or "cache" file, and the Internet address of the source of the file is logged or recorded into the "navigation" directories and files of Microsoft Explorer. At the same time, if a computer system contacts an Internet website, the website itself will transmit a "cookie" which is a short computer code which (using Microsoft Explorer as an example) is logged or recorded in the "Cookies" directory of the Internet browsing software. A "cookie" is a computer code logged into a receiving computer for future reference the next time that computer system contacts the website. The use of cookies enables the website administrators/owners to know if that computer system has previously visited the website before. Generally speaking, these cookie and cache files are computer data files which are "associated" with the computer data file containing the image or data being downloaded (that is transmitted) from the Internet to a computer accessing a website on the Internet. Just as a card index system may be created to catalog a limitless number of features relative to the contents of a filing cabinet, so too may "associated" computer data files be created for a wide variety of software applications relative to other computer data files (and not just merely Internet communication and browsing). This recording and logging feature is not limited to IBM-compatible computers, but applies to various computer systems and computer programs although the name for the storage locations (e.g. "cache" or "cookie" file) may change depending on the computer system and the computer software. Through a careful and thorough analysis of files which are in any way "associated" with a file of evidentiary significance, it is possible to determine: where a computer system has "gone" or "visited" and identify "where" on the internet; where certain evidentiary computer data files were taken from the internet; who was at the keyboard at or around the time that certain computer data files of evidentiary significance were created, modified, printed or deleted; and when the computer activity occurred. Therefore, by examining the aforementioned "associated" files contained within the hard drive of a particular computer, it is possible for investigators to learn of any web-based email sites or other online user accounts visited by the user. Then, through investigative methods such as the use of subpoenas and court orders, these and other individuals may be identified by law enforcement. Without going through this examination process, investigators are unable to learn of the existence of other email service(s) or online

accounts being utilized by the suspect.

## Encryption, Hiding or Disguising Files

Today, computers are also capable of disguising or hiding data to hinder or prohibit its detection. Computers are capable of encrypting and/or password protecting data so as to make it unretrievable by the average computer user. Some law enforcement agencies have in their possession computer software which will assist in breaking some forms of encryption and/or password protection, but the use of such software can be time consuming, depending upon the amount of data stored and the complexity of the encryption. Attempting to decrypt data is an extremely time and equipment intensive process requiring a laboratory environment to be done effectively. Some users will purposefully rename files with otherwise innocuous file names to deter curiosity seekers and others.

I know from my training and experience that commonly used digital devices, including but not limited to, smartphones, tablets and laptops, are portable devices. These mobile devices can be moved from one Wifi connection to another with ease. It is not uncommon for a device to have been logged into more than one Wi-Fi connection per day.

I know from my training and experience that even if the files were deleted by a user, they still may be recoverable by a trained computer forensic examiner.

I know from training and experience that computers used to access the Internet usually contain files, logs, or file remnants which would tend to show ownership and use of the computer as well as ownership and use of Internet service accounts used for the Internet access.

I know from training and experience that search warrants of residences involved in computer related criminal activity usually produce items that would tend to establish ownership or use of computers and ownership or use of any Internet service accounts accessed to commit financial and identity fraud to include credit card bills, telephone bills, correspondence, and other identification documents.

I know from training and experience that search warrants of residences usually reveal items that would tend to show dominion and control of the property searched, to include utility bills, telephone bills, correspondence, rental agreements, and other identification documents.

I know from training and experience that a person can access their home WiFi from other areas on their property outside of the house where the router is located.

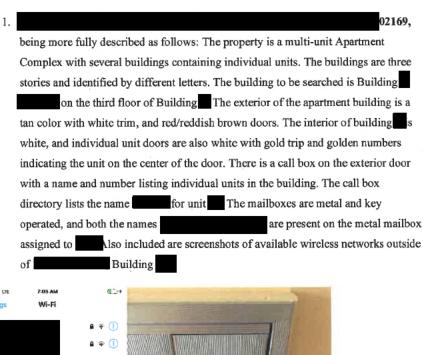
Although the IP Address used to access the internet will change, the IP Address artifacts and data contained on the device(s) may be recoverable by a trained computer forensic examiner.

## CONCLUSION

Based upon the above, there is probable cause to believe that digital(s) including but not limited to: cell phone(s), or complete located at the property of	outer(s) that have used the IP address
	, ,
have been utilized to commit crimes in violation of Chapter	. , . , .
FRAUD), Chapter 266 Section 37 (FRAUDULENT CHECK	
Chapter 266 Section 120F (UNAUTHORIZED ACCESS TO	O COMPUTER SYSTEM), and
Chapter 90 Section 24B (STEALING OR FALSELY OBTA	INING A MASSACHUSETTS
DRIVERS LICENSE).	
I respectfully request that the Court issue a search wa	arrant and order of seizure,
authorizing the search of	02169 as described
previously in the description of places to be searched.	
Signed under the penalties of perjury on this 10 <sup>th</sup> day of May	7, 2019.
Trooper	Cristina Lucin #3634
Then personally appeared before me the above named Troop the foregoing affidavit by them subscribed is true, on this 10	
	_
Associa	ate Justice of the District Court

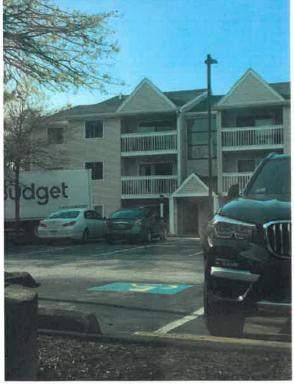
## ADDENDUM A: DESCRIPTION OF THE PLACES TO BE SEARCHED

I am seeking the issuance of a warrant authorizing the searches of:









2. D2170, Being more fully described as follows: This property is a single family home located on Eustis Street in Quincy, near the Wollaston neighborhood. The house appears to be two stories with an attic, and a sunroom/porch on the first floor. The color of the house is light blue with white trim. There is a small driveway to the west side of the home, wide enough to fit two vehicles side by side. The number "18" is on the exterior of the home.



## ADDENDUM B: DESCRIPTION OF ITEMS TO BE SEARCHED AND SEIZED

This affidavit is in support of a search warrant to search for and seize the following items: All "Computer Systems," including, but not limited to:

- i. Desktop-type personal computers
- ii. Laptop or Notebook-style computers
- iii. Mobile or Hand-held devices including but not limited to:
  - (1) Cell phones
  - (2) Smartphones
  - (3) Tablets
- Electronic network components, including but not limited to, MiFi components, Wi-Fi components, routers, servers, and data storage systems.
- v. Cloud-based systems and data storage components connected to or integrated with items i though iii above.
- vi. Computer Data Storage and Retrieval Devices and Media (which can, depending upon device, serve as an input and/or an output device), including, but not limited to:
  - (1) Diskettes
  - (2) Compact Disks
  - (3) Digital Video Disks (DVDs)
  - (4) USB Flash Drives
  - (5) External Hard Disk Drives
  - (6) Cloud-based data storage
- vii. Computer System Documentation, including, but not limited to:
  - (1) Operating System and Application programming disks, CD-ROMs, etc.
  - (2) Programming and Applications manuals, books or brochures.
- (3) Peripheral devices capable of capturing and transmitting digital images or video (e.g.: web cameras.)
- viii. Notations of screen names or email address(es), computer access codes, passwords and/or protocols, whether stored or recorded electronically on diskette, etc., or non-electronically on paper, in a book, etc.
- ix. Any information including letters, mail, notes, receipts, bills, etc. relating to the control or ownership of the "computer systems" and the area of its location.

And with regard to such "Computer Systems" to transport the same to a secure location and there to SEARCH therein for and SEIZE:

a. Computer data files, records, and logs associated with any of the above described files which may identify, trace, or record the facts, including, but not limited to the date, time, modification, alteration, transmission or receipt via the Internet or other networks of any of the computer files described above, including, but not limited to file menus, Internet browser history, cache directories, registry entries, logs, and files

- b. Computer data files including, but not limited to metadata, records, and logs associated with any of the above described files which may identify, trace, or record the facts, including but not limited to the date, time, modification, alteration, transmission or receipt via the Internet or other networks of any of the computer files described above, including but not limited to file menus, Internet browser history, cache directories, registry entries, logs, and files.
- c. Any installed computer application software and any related data files that will be necessary to detect and/or access and read any of the computer files or applications described above.
- d. The directory and file structure of each computer system and storage medium described above.
- e. Any computer file or data demonstrating the access to, control of and/or creation of any
  of the above files or applications and the date and time of such access or creation

I am also requesting that the court authorize the search and collection of the following

#### **DOCUMENTARY EVIDENCE** related to this case:

- Documents, records, etc., which are evidence and fruits of certain Massachusetts General Law (M.G.L.) Chapter 266 and Chapter 90 fraud statutes, sought from an operation which was completely "permeated with fraud"
- Documents, papers, receipts, and other writings which are evidence of a conspiracy to commit identity fraud, document fraud, and/or financial fraud.
- c. Representative handwriting samples
- d. "Papers" indicating the ownership or occupancy of Massachusetts
- e. All checkbooks, cancelled checks, deposit slips, bank statements, trust account receipts, check stubs, books and papers, etc., which would tend to show a fraudulent intent or any elements of the crime of false pretense or embezzlement.
- f. Any and all identification cards, driver's licenses, driving permits, passports, or other photo identification which are evidence or fruits of the above described crimes.

#### COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

#### DISTRICT COURT DEPARTMENT

## AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT G.L. c. 276, §§ 1 to7; St 1964, c. 557

May 10, 2019

#### AFFIDAVIT OF TROOPER CRISTINA J LUCIN

I, Trooper Cristina J. Lucin, being duly sworn, do depose and say under the pains and penalties of perjury that the following is true to the best of my knowledge:

## BACKGROUND OF THE AFFIANT

- I, Cristina J. Lucin, am a Massachusetts State Trooper, presently assigned to the Fraud Identification Unit, sub-unit of the Division of Homeland Security and Preparedness. I have been a Massachusetts State Trooper since my graduation from the Massachusetts State Police Academy in March 2012. While attending the State Police Academy in New Braintree, MA, I received specialized training in criminal investigations. Prior to my current assignment, I was assigned as the Chief of Staff to the Deputy Superintendent of the Massachusetts State Police. Prior to serving as the Deputy's Chief of Staff, I was a uniformed Trooper in the Department of Field Services as a Patrol Trooper in Holden, MA and Boston, MA. I possess a Bachelor's Degree (B.S) in Criminology from Merrimack College (2010) and an Associate's Degree (A.S) in Cybersecurity from Bunker Hill Community College (2018). In 2017 I also earned my A+ certification through CompTIA industries (Computing Technology Industry Association).
- 2. My current assignment with the Fraud Identification Unit began in August 2017. Since that time, I have investigated hundreds of cases involving Identity Fraud, Document Fraud, and Benefit Fraud at the state and local level. The Fraud Identification Unit is co-located within the Massachusetts Registry of Motor Vehicles (RMV) enforcement services office. Many of our cases involve the use of Facial Recognition Technology to identify suspect identities

within the Commonwealth of Massachusetts. The unit also investigates document fraud occurring within the Registry of Motor Vehicles licensing and vehicle registration division, as well as RMV employee corruption and theft cases.

- 3. I am also currently assigned to the Federal Document and Benefit Fraud Task Force (DBFTF) out of Boston. The DBFTF includes Homeland Security Investigations, Department of State, Office of the Inspector General, Office of Housing and Urban Development, Office of Health and Human Services, and several other local and state agencies. This task force focuses on document and benefit fraud perpetrated in Massachusetts and works in conjunction with the U.S Attorney's Office in Boston to prosecute these individuals criminally.
- 4. I have completed the following computer security and specialized law enforcement trainings:

2015: National White-Collar Crime Center (NW3C) Basic Data Recovery and Analysis (BDRA)

2016: NW3C Social Media Investigations and Open Source Investigations

2016: NW3C Basic Network Intrusion Investigations (BNII)

2016: National Cyber Crime Conference (NCCC)

2017: NCCC

2018: The Reid Technique Interviewing and Interrogation

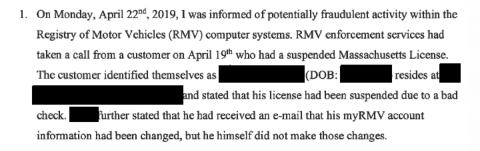
- 5. Prior to my employment as a Massachusetts State Trooper, I was employed by the United States Coast Guard. I served as an Operations Specialist, first class out of Coast Guard Sector Boston. During my time in the Coast Guard, I participated in numerous law enforcement activities including vessel security screenings, narcotics interdiction cases, and human and goods smuggling investigations.
- 6. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other troopers, law enforcement officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

## TECHNICAL DEFINITIONS

As used herein, the following terms have the following meanings:

- a. An Internet Protocol (IP) address is the globally unique address of a computer or other device connected to a network, and is used to route Internet communications to and from the computer or other device.
- b. A "session" refers to a limited time of communication between two systems. Some sessions involve a client and a server, while other sessions involve two personal computers.
- c. An "ISP" refers to an Internet service provider, which is a company that provides customers with Internet access. Data may be transmitted using several technologies, including dial-up, DLS, cable modem, wireless or dedicated high-speed interconnects.

#### PROBABLE CAUSE



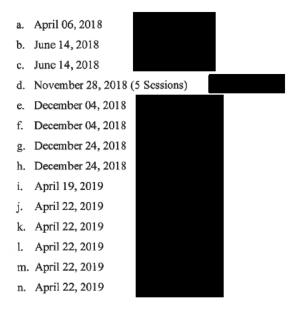
- 2. "myRMV" is a customer portal for the RMV which allows for over 40 transactions that can be completed online by a customer. If a customer needs to visit the RMV, myRMV will allow a customer to "Get Ready Online First" and potentially shorten their visit and wait times at any RMV branch location.
- 3. Enforcement Services reviewed s account and discovered that an online myRMV account had been created on April 6th, 2018. On this date, an individual utilized the myRMV account portal, entered s name, date of birth, full social security number, and residential zip code. An e-mail address of was added as the authentication method. No other activity was present on the record until November 28th, 2018. On November 28th, 2018, someone other than gained access to the myRMV account, changed the mailing address to and requested a duplicate license. The replacement license is commonly referred to as a "Duplicate" costs 25 dollars. The duplicate request was paid for when the suspect entered routing information for EAST WEST BANK and an account number as an "eCheck" payment, myRMV provided confirmation of the transaction, showing a successful purchase of the duplicate license. Several days after this transaction, the eCheck bounced 's license was suspended due to BAD CHECK PAYMENT of 25.00 to the registry.
- When a myRMV account is configured via the web portal, a customer must select an authentication method. Two-factor authentication (2FA) is an additional layer of

protection utilized by online services to verify an individual's identity. myRMV allows a user to select 2FA with a phone number or e-mail address. When the myRMV account belonging to was created, an authentication e-mail was provided:

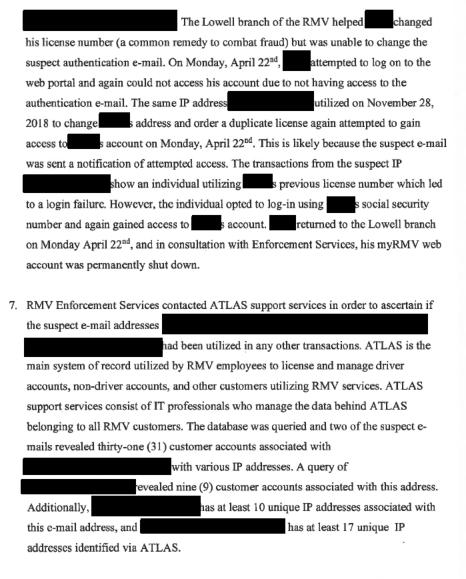
ZHU stated that he had never heard of that e-mail address, nor had he utilized that e-mail address at any time. On November 28, 2018, the day the duplicate license was ordered the authentication e-mail was changed to

On December 24, 2018, the authentication e-mail was changed to was asked if either of those e-mails belonged to him and he stated that he had never utilized those e-mails.

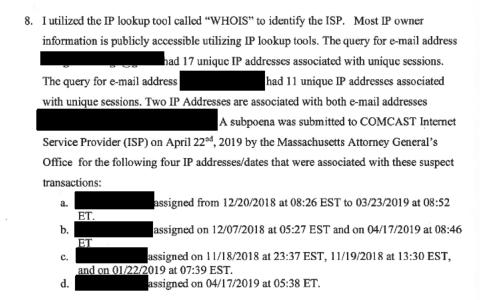
5. Several IP addresses are associated with "sessions" which represent different connections between this user account and the myRMV system. The myRMV system contains licensing and vehicle registration data for the entire RMV database. The following IP addresses were utilized on account:



contacted enforcement services on Friday April 19<sup>th</sup> when he was unable to access
his account and did not recognize the authentication e-mail



## Analysis of IP Addresses Associated with Suspect Accounts



9. COMCAST provided the following results of the subpoena requests listed above:

## a. assigned from 12/20/2018 at 08:26 EST to 03/23/2019 at 08:52 ET:



Legal Response Center 1800 Bishops Gate Boulevard Mount Laurel, NJ 08054 865-947-8572 Tel 866-947-5587 Fax

#### CONFIDENTIAL

April 24, 2019

Lilian Ilitzky Massachusetts Attomey General's Office One Ashburton Place, 19th Floor Boston, Massachusetts (MA) 02108

RE:	Subpoena
	Comcast File #:
	Case #:

Dear Lilian Ilitzky:

The Subpoena received on 04-24-2019 with respect to the above referenced matter has been forwarded to the Legal Response Center for a reply. The Subpoena requests Comcast to produce certain subscriber records pertaining to the following IP Address: ssigned from 12/20/2018 at 08:26 EST to 03/23/2019 at 08:52 ET.

Based on the information provided pursuant to the Subpoena, the subscriber information obtained is provided below:

Subscriber Name:
Service Address:

Bill to Name:
Telephone #:
Type of Service:
Account Number:
Start of Service:
Account Status:
IP Assignment:
Current IP:
E-mail User Ids:

Service Address:

High Speed Internet Service

05/26/2016
Active
Dynamically Assigned
See Attached

If you have any questions regarding this matter, please feel free to call 866-947-8572.

b.

assigned on 12/07/2018 at 05:27 EST and on 04/17/2019 at

08:46 ET:



Legal Response Center 1800 Bishops Gate Boulevard Mount Laurel, NJ 08054 866-947-2572 Tel 866-947-5587 Fax

#### CONFIDENTIAL

April 24, 2019

Lilian <u>Ilitzky</u>
Massachusetts Attomey General's Office
One <u>Ashburton</u> Place, 19th Floor
Boston, Massachusetts (MA) 02108

RE: Subpoena

Comcast File #:

Case #:

Dear Lilian Ilitzky:

The Subpoena received on 04-24-2019 with respect to the above referenced matter has been forwarded to the Legal Response Center for a reply. The Subpoena requests Comcast to produce certain subscriber records pertaining to the following IP Address: assigned on 12/07/2018 at 05:27 EST and on 04/17/2019 at 08:46 ET.

Based on the information provided pursuant to the Subpoena, the subscriber information obtained is provided below.

Subscriber Name: Service Address:

Telephone #: Type of Service:

High Speed Internet Service

Account Number: Start of Service:

05/04/2016

Account Status:

Active

IP Assignment:

Dynamically Assigned

Current IP:

See Attache

E-mail User Ids:

If you have any questions regarding this matter, please feel free to call 866-947-8572.

Very Truly Yours, Comcast Legal Response Center

#### assigned on 11/18/2018 at 23:37 EST, 11/19/2018 at 13:30 EST, and

#### on 01/22/2019 at 07:39 EST:



Legal Response Center 1800 Bishops Gate Boulevard Mount Laurel, NJ 08054 866-947-8572 Tel 868-947-5587 Fax

#### CONFIDENTIAL

April 24, 2019

Lilian <u>Hitzky</u>
Massachusetts Attomey General's Office
One <u>Ashburton</u> Place, 19th Floor
Boston, Massachusetts (MA) 02108

RE: Subpoena Comcast File # Case #:

Dear Lilian Ilitzky:

E-mail User Ids:

The Subpoena received on 04-24-2019 with respect to the above referenced matter has been forwarded to the Legal Response Center for a reply. The Subpoena requests Comeast to produce certain subscriber records pertaining to the following IP Address: 76.118.167.78 assigned on 11/18/2018 at 23:37 EST, 11/19/2018 at 13:30 EST, and on 01/22/2019 at 07:39 EST.

Based on the information provided pursuant to the Subpoena, the subscriber information obtained is provided below:

Subscriber Name:
Service Address:

Telephone #:
Type of Service:
Account Number:
Start of Service:
Unknown
Disconnected 01/31/2019
Dynamically Assigned

If you have any questions regarding this matter, please feel free to call 866-947-8572.

Very Truly Yours, Comcast Legal Response Center

### d. assigned on 04/17/2019 at 05:38 ET:



Legal Response Center 1800 Bishops Gate Boulevard Mount Laurel, NJ 08034 866-947-8572 Tel 866-947-5587 Fax

#### CONFIDENTIAL

April 24, 2019

Lilian Ilitzky Massachusetts Attorney General's Office One <u>Ashburton</u> Place, 19th Floor Boston, Massachusetts (MA) 02108

RE:	Subpoena
	Comcast File #:
	Case #:

#### Dear Lilian Ilitzky:

The Subpoena received on 04-24-2019 with respect to the above referenced matter has been forwarded to the Legal Response Center for a reply. The Subpoena requests Comcast to produce certain subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the following IP Address: usual subscriber records pertaining to the

Based on the information provided pursuant to the Subpoena, the subscriber information obtained is provided below:

Subscriber Name:
Service Address:

Telephone #:
Type of Service:
Account Number:
Start of Service:
Unknown
Account Status:
IP Assignment:
Current IP:
See Attached

Service Address:
Unknown
See Attached

If you have any questions regarding this matter, please feel free to call 866-947-8572.

Very Truly Yours, Comcast Legal Response Center

<ol><li>Based on the results provided from COMCAST, my office generated a lis</li></ol>	t of myRMV
accounts connected to the above four addresses:	

- a. b. c.
- 11. A query through the RMV ATLAS system revealed additional compromised records based on the above IP addresses:
  - i. 138 associated customer accounts
    b.

    i. 4 associated customer accounts

    c.

    i. 108 associated customer accounts

    d.
    - i. 16 associated customer accounts
- 12. In addition to the above IP addresses and physical addresses, the following IP addresses were located on the affected myRMV accounts and show signs of the same fraudulent activity. The owner and lessee of these IP addresses are still under investigation:
  - a. (155 customer accounts)
    b. (122 customer accounts)
    c. (16 customer accounts)
- 13. In addition to the above IP addresses, the following electronic mail addresses were associated with fraudulent customer transactions. A subpoena and preservation order is pending to determine the owner/location information associated with these e-mail addresses:





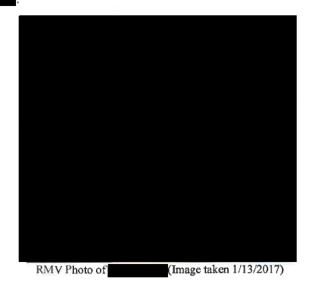
14. The above lists above are not exhaustive. At this time, the Fraud Identification Unit suspects that over 200 individual accounts have been compromised. This information was gathered via IP address searches, suspect e-mail searches, and physical address searches utilizing the information gathered in this case.

#### ACTIVITY AT

- 15. The subpoena request above identified \_\_\_\_\_\_\_as the physical address associated with logical IP address \_\_\_\_\_\_\_for the given dates and times of suspect transactions. A total of 138 associated customer accounts and over 400 unique sessions were identified from the period of time between June 2018 and present.
- 16. Compromised accounts were differentiated from victim accounts by the activity on the records. The accounts where customer information was changed was considered victim accounts. Some of these victims have had changes of mailing address, and duplicate or renewal licenses mailed to their own address or another address added by the suspect.
- 17. I identified 21 victim accounts where a bad payment was present on the myRMV record. "Bad Payment" represents a payment for RMV services made through myRMV that was returned or "bounced". On these 21 records, a bad payment was made in the form of "eCheck" or Electronic Check. An electronic check is an electronic version of a paper check used to make payment online. To make a payment with an eCheck, a customer needs to provide the following information:
  - a. Bank routing number
  - b. Bank account number

- c. Name on your bank account
- 18. The Registry of Motor Vehicles offers two ways for customers to pay for online transactions: eCheck or credit/debit card. All 21 victims referenced above had a replacement license ordered from myRMV paid for via eCheck. The Massachusetts RMV does not require the user to provide the name on the bank account when an eCheck is submitted. Instead, the user of a myRMV account only needs to provide routing number and account number. If a transaction is successful, the user is provided with a confirmation page and the pending replacement license request is initiated. Replacement licenses should be delivered within seven to ten business days.
- 19. One of the customer accounts linked to the IP address

  02169. This is the current RMV mailing
  address and self-identified address (see paragraph 27) of (DOB:



tall, with a medium to heavy build.

## MOTIVE AND MEANS FOR OBTAINING RMV/DMV CREDENTIALS

- 22. Based on my training and experience within the Fraud Identification Unit, I have identified various motives for those seeking to fraudulently obtain a Massachusetts issued Driver's License, Learner's Permit, Identification Card, or Liquor ID. Some of those motives include:
  - a. Right to drive/operate a motor vehicle both State and Federally

- b. Establishes legal residency status within a state or federally
- c. Identification necessary to open banking/checking accounts
- d. "Clean" identity to cover up extensive criminal history or arrest warrants
- e. Right to travel via bus, train, or airplane within the United States
- f. Human trafficking/smuggling operators seeking valid identities to conceal victims from Law Enforcement
- 23. The bad check/returned eChecks present on victim records demonstrate a utilization of fraudulent financial means to obtain these credentials. In addition to bad checks, customers have reported having credit cards opened in their names and without their authorization as well as credit report alerts of activity associated with addresses other than their own. The investigation to date has led to bad checks from the following financial institutions: Bank of America, J.P. Morgan Chase, and T.D. Bank.
- s Bank of America checking account. Several victims whose information was compromised via myRMV also have been identified as victims through Bank of America's fraud detection services. (SEE ATTACHMENTS FOR BANKING DOCUMENTS). Bank of America also identified the IP address as one utilized by to commit "Check Kiting". "Check Kiting" fraud is committed against a banking institution by accessing deposited funds in one account before they can be collected from another account upon which they are drawn. This scheme involves several different banks or financial institutions and is accomplished when a bank deposits accessible money into an account while waiting for cash to be processed from an account at another bank when in actuality; the other account holds no money.
- 25. Bank of America Investigators provided detailed banking records showing that had been observed on ATM surveillance depositing a bad check. The following images were provided by Bank of America and show WANG depositing a fraudulent check into his personal checking account. Note that the check is also endorsed by



12/30/2018 02:10:34.92 mu ATR IMAM1522 IP Surveillance North-Quincy-141103



12/30/2018 02:09:58.40 ATM TMAN1522 IP Surveillance North-Quincy-141103

PF4=MAIN MENU PF8=DC REMARKS PF9=DC MENU PF11=PAGE BACK 02/08/19 \*\* FAST DC TRANS HIST INQ DETAIL - MASSACHUSETTS \*\* 14:32:46 ENTITY: NMA TYPE: PLAT STATUS: PURGEABLE ACCOUNT: PG#: 006 PG\$: 006 CUSTOMER: CONSUMER/COMMUNITY EMP DATE: 10/22 ISSUED: 10/05/18 REISSUED: 02/01/19 LOB: LST AUTH: TEM OWNER : BANK OF AMERICA

ID/# : IMAH1522/0088824

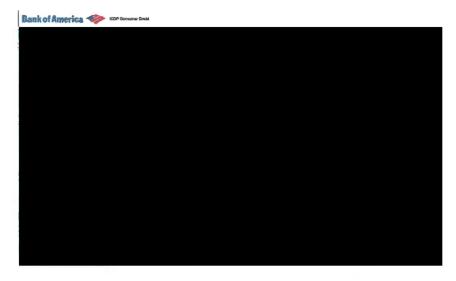
ADDRESS: \*NOETH QUINCY

CITY/ST: QUINCY

MA

ODP: N SEQ # : 6559 X-INQUIRY SEQ#: 0028
TRAMS TYPE : 12 CHK DEP
PL DATE/TIME: 10/22:10
CARD EXP DTE: 10/22
TRANS ANOUNT: \$57.2\$ ODP:
SITE: S
DEP HLD RECM: K NO HOLD RECOMMENDED
AUTH CODE :
ADTH MODE : AUTH BY HOST MINI CRD IND: 8 CHIP CARD LMT TYPE/AMT: AMT IMMED CR: 200.00 Amount: \$897,26 Sequence Number: 2552048270 Account: 242946598 Capture Date: 12/31/2018 Bank Number: 11110275 Check Number: 5710 Avaion Property Holdings, LLC dba Avaion at Chase Oaks Subthyand BM. FREEL, TREES-MICE 494-946-1099 5710 Date: 11/30/2018 Origin Bank Memo: Unit - NIA-2028 \$\*\*897.26\*\* "Eight Hundred Ninety Seven Dollars and 26 Cents" Ø L Zithul #005710# #111102758#

26. One victim identified in this investigation is . Both and her husband, reported fraudulent activity on their myRMV accounts to the RMV Enforcement Services office. Their myRMV accounts were shut down in November of 2018. An analysis of their records show that multiple sessions originating from IP address were conducted on their myRMV accounts with suspect e-mail Bank of America provided information that attempted to open up a bank account in s name, with as a card holder. The account lists the mailing address as " which has been identified in this investigation as a possible drop address. The following information was provided by Bank of America and lists the client IP address as



27. Based on the facts above, I believe is utilizing the Personally Identifiable Information (PII) of other Massachusetts residents to commit Identity Fraud and Financial Fraud in violation of various Chapter 266 M.G.L. and Chapter 90-24B statutes. has utilized PII and fraudulent banking accounts to order and have delivered Massachusetts Driver's Licenses which aid in this fraud.

#### ACTIVITY AT

28.	. Of the 23 identified victims with associated bad ch	neck payments to the Registry of Motor
	Vehicles, 10 individuals had their residential, mail	ing, or both residential and mailing
	address changed on their record. The address was	changed to "
	MA". is a residential address in	proximal to Wollaston beach.
	Those 10 address changes originated from a session	n identified by IP address
	This is the same IP address assigned to	The
	most recent activity connected to	was a duplicate license ordered and
	sent to on April 27 <sup>th</sup> , 2019. The m	ost recent internet activity connected to
	18 Eustis Street also occurred on April 27th, 2019.	

Commented [BC(1]: May need to identify the time frame of this activity

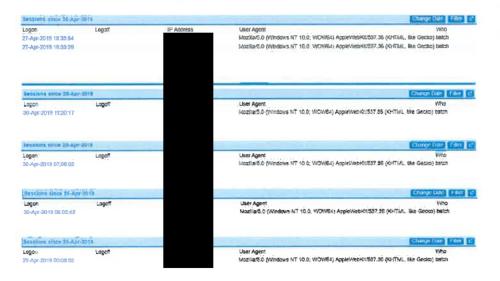
- 29. Based on my training and experience, Financial and Document Fraud perpetrators often attempt to hide their physical location to insulate themselves from law enforcement and other investigators. Because of this, they often have their fraudulent documents, identification cards, and checks/other information sent to an address other than the one they currently reside at. It is my belief that and potentially other involved parties have utilized as a physical drop address to conceal their criminal activity. A "drop address" refers to a physical or digital address which is used to collect tangible products that are bought illicitly, stolen, or requested.
- 30. In March of 2019, Quincy Police filed an Incident Report related to mail theft and identity fraud occurring in Quincy. On March 27<sup>th</sup>, 2019, Detective Tom Pepdjonovic completed an incident report identifying an Identity Fraud Suspect by the name of was observed by Detective Pepdjonovic over several months at various addresses where identity theft victims had mail sent:

  Detective Pepdjonovic confirmed that rented a room at over the past several months. Quincy Police, Braintree Police, and Norwood Police have all filed similar reports in which victims of identity fraud have reported mail being sent to addresses other than their own, or mail stolen from their mailbox.

31.	. This office is currently investigating the connection between
	On April 27th, 2019, departed on a direct flight from JFK.
	International Airport to Fuzhou, China. There are several active warrants out of Dedham
	District Court for s arrest for charges of Identity Fraud, Credit Card Fraud,
	Motor Vehicle charges, and possession of narcotics. When
	(Detailed in paragraph 27) was interviewed by Norwood Police in relation to credit card
	fraud at the Jaguar/Land Rover Dealership in Norwood,
	took s white Range Rover for service. Norwood Police did not charge
	with credit card fraud, but instead filed charges against ut of
	Dedham District Court.

32. Since April 27<sup>th</sup>, 2019, this office has detected fraudulent activity continuing on victim's records. Specifically, the Fraud Identification Unit has identified five customer records accessed since April 27<sup>th</sup>, 2019. These customer accounts were authenticated via e-mail addresses

Those records were accessed on the following dates and times:



#### INFORMED DELIVERY AND MAIL THEFT

- 33. Several victims of identity fraud connected to our investigation and connected to the investigations of Quincy Police, Braintree Police, and Milton Police claim that they were signed up for Informed Delivery. According to the United States Postal Service, informed delivery is "a free and optional notification service that gives residential consumers the ability to digitally preview their letter-sized mail pieces and manage their packages scheduled to arrive soon. Informed Delivery allows users to view what is coming to their mailbox on a computer, tablet or mobile device. To automate the sortation and delivery of mail, the United States Postal Service (USPS) digitally images the front of letter-sized mail pieces that run through automation equipment. USPS is now using those images to provide digital notifications to users in advance of the delivery of physical mail.
- 34. The Massachusetts State Police Fraud Identification Unit has worked another case in conjunction with the USPS Mail Inspectors in which informed delivery was utilized to aid criminals in stealing mail from an individual's mailbox without their knowledge. The evidence gathered in this case shows that Informed Delivery is likely one method being used by a suspect or suspects to conceal the fruits of the fraud they commit. Specifically, as it relates to fraudulent license duplicate orders, a suspect or suspects is utilizing Informed Delivery to obtain Massachusetts Driver's Licenses fraudulently obtained without the knowledge of the home owner.
- 35. In addition to informed delivery, it is possible that the physical drop addresses utilized in this case belong to other individuals connected to the identity and financial fraud described above.

#### USE OF COMPUTERS TO CONDUCT CRIMINAL ACTIVITIES

36. Based on my training and experience, I am familiar with the use of computers as an instrumentality in a crime, as creating contraband, or as containing contraband. I know that computer hardware, software, and electronic files may be important to a criminal investigation in two distinct ways: (1) the objects themselves may be contraband, evidence, instrumentalities, or fruits of crime, and/or (2) the objects may be used as

storage devices that contain contraband, evidence, instrumentalities, or fruits of crime in the form of electronic data. I know that when an individual uses a computer to obtain unauthorized access to a server over the Internet, the individual's computer will generally serve both as an instrumentality for committing the crime, and as a storage device for evidence of the crime.

- 37. The computer is an instrumentality of the crime because it is used as a means of committing a criminal offense. In particular, the individual's computer is the primary means for accessing the Internet, communicating with the victim computer, and ultimately obtaining the unauthorized access that is prohibited by M.G.L. Chapter 266 Section 120F. The computer is also likely to be a storage device for evidence of crime because records and evidence relating to the crimes are stored on the computers for future use. Those records and evidence may include files that recorded the unauthorized access, stolen passwords, computer logs, individual's notes as to how the access was achieved, and other records that indicate the scope of the individual's unauthorized access. Criminal Procedure permits law enforcement to search for and seize computer hardware, software, and electronic files that are evidence of crime, contraband, instrumentalities of crime, and/or fruits of crime.
- 38. In this case, the warrant application requests permission to search and seize for evidence, likely digital and paper, related to the unauthorized access into the Registry of Motor Vehicles computer network and of illegal interceptions of Personally Identifiable Information (PII). This digital and paper evidence constitute both evidence of crime and contraband. This affidavit also requests permission to seize computer hardware and mobile devices that may contain evidence of computer intrusions and/or unauthorized access and of illegal intrusions of RMV data, if it becomes necessary for reasons of practicality to remove the hardware and conduct a search off-site. I believe that, in this case, the computer hardware and mobile devices are containers for evidence, containers for contraband, and also itself instrumentalities of the crime under investigation.
- 39. The primary purpose for requesting authorization to gain this information is for law enforcement to attain the goals of this investigation. The goals of this investigation

continue to be to:

- a. identify all locations from where any and all fraudulent electronic transactions originate;
- b. identify perpetrators PII source(s);
- c. identify other suspects and involved individuals deal with;
- d. identify meet locations of other suspects or Persons of Interest (POI)
- e. identify any financial institutions, which perpetrators might be utilizing to launder the proceeds from these fraudulent financial scams;
- f. Ultimately affect an arrest of any and all perpetrators for Chapter 266 M.G.L., and Chapter 90 M.G.L. violations.
- 40. Based upon my knowledge, training, and experience, I know that in order to completely and accurately retrieve data maintained in computer hardware or on computer software, to insure accuracy and completeness of such data, and to prevent the loss of the data either from accidental or programmed destruction, it is often necessary that some computer equipment, peripherals, related instructions in the form of manuals and notes, as well as the software utilized to operate such a computer be seized and subsequently processed by a qualified computer specialist in a laboratory setting. This is true because computer storage devices (such as hard disks, diskettes, tapes, compact disks, thumb drives, etc.,) can store the equivalent of thousands of pages of information. Additionally, a user may seek to conceal criminal evidence by storing it in random order with deceptive file names. Searching authorities are thus required to examine all the stored data to determine which files are evidence or instrumentalities of criminal activity. This sorting process can take days or weeks, depending on the volume of data stored, and it could be impractical to attempt this kind of data analysis "on-site."

#### REASONABLE INFERENCES BASED ON TRAINING AND EXPERIENCE

#### Request for Off-Premise Search

For the foregoing reasons, I request to search for the computer system(s) and associated storage medium more particularly described above and to transfer it to a secured law enforcement location where its contents may be forensically examined by qualified personnel in a manner best suited for the retrieval and preservation of all evidence.

#### Transfer of Digital Files

I know that there are several methods by which files can be copied or transferred from one electronic storage device to another. Files are easily transferred from one device or piece of storage media (i.e. computer, storage disk, cell phone, digital camera) to another by saving to a disk (i.e. CD, DVD, or USB storage drive), transferring via a connecting cable (i.e. USB, firewire, etc.) to an external device, or through electronic transfer, such as email. I also know that nowadays files and/or communications can just as easily be accessed, stored, sent or received using hand-held mobile devices like cellular telephones ("smartphones") as they can through a desktop or laptop personal computer.

#### The Ability to "Undelete" Files

When most computers store data, the operating software tells the CPU (central Processing Unit) to assign the data a "file" name (usually a pre-existing file name if it exists, or a name selected (via keyboard input by the user) and sends the data to a storage medium, typically either the "hard drive" of the computer, the floppy drive, or some other peripheral storage device such as a zip drive, tape drive, or writable compact disk (WCD). In order to manage the inventory of all stored files, many operating systems (such as most Windows operating systems) also maintain a "File Allocation Table" (FAT) which tells the CPU where all data is stored. The names (and actual locations of the data on the hard drive or other storage medium) are recorded in the FAT each time a "file" is saved, accessed, modified, transferred or otherwise affected. When a file is "deleted" by a user, the computer does not in fact remove its data from the designated storage medium, but instead, alters the FAT to indicate that the space previously consumed by that "deleted" data is now available to be overwritten with new data if necessary. Typically, space that is consumed by "deleted" data is not immediately overwritten. This fact is important in law enforcement since it means that so-called "deleted" files or data are, in fact, often still present on the computer's storage medium (i.e. floppy disk, hard drive, tape drive, etc.) and can be and has been recovered months, years, and even decades after their deletion if the integrity of the computer system is maintained. In my experience, it is not at all uncommon to be able to "undelete" deleted files or data years after their deletion date. As the capacity of computers to store data rises each year, the likelihood that previously "deleted" data has not yet been overwritten and is still recoverable also rises concurrently. The result is that evidence of a crime, stored in a computer system, may be recovered even after the passage of significant periods of time and, in some instances, even after a deliberate attempt to destroy it.

#### Cache Files

I further know that in the vast majority of computer systems, each time a file is received, transferred, modified, altered, or otherwise affected, the computer will make some form of a notation or record of that event either in a "log" of activity or by creating or modifying (at or about the same moment in time) a file "associated" with the computer data file which witnessed the activity. For example, when files are received in most IBM-compatible systems using Microsoft Explorer as a software application to navigate the Internet, the file is loaded into a "Temporary Internet" directory and/or "cache" file, and the Internet address of the source of the file is logged or recorded into the "navigation" directories and files of Microsoft Explorer. At the same time, if a computer system contacts an Internet website, the website itself will transmit a "cookie" which is a short computer code which (using Microsoft Explorer as an example) is logged or recorded in the "Cookies" directory of the Internet browsing software. A "cookie" is a computer code logged into a receiving computer for future reference the next time that computer system contacts the website. The use of cookies enables the website administrators/owners to know if that computer system has previously visited the website before. Generally speaking, these cookie and cache files are computer data files which are "associated" with the computer data file containing the image or data being downloaded (that is transmitted) from the Internet to a computer accessing a website on the Internet. Just as a card index system may be created to catalog a limitless number of features relative to the contents of a filing cabinet, so too may "associated" computer data files be created for a wide variety of software applications relative to other computer data files (and not just merely Internet communication and browsing). This recording and logging feature is not limited to IBM-compatible computers, but applies to various computer systems and computer programs although the name for the storage locations (e.g. "cache" or "cookie" file) may change depending on the computer system and the computer software. Through a careful and thorough analysis of files which are in any way "associated" with a file of evidentiary significance, it is possible to determine: where a computer system has "gone" or "visited" and identify "where" on the internet; where certain evidentiary computer data files were taken from the internet; who was at the keyboard at or around the time that certain computer data files of evidentiary significance were created, modified, printed or deleted; and when the computer activity occurred. Therefore, by examining the aforementioned "associated" files contained within the hard drive of a particular computer, it is possible for investigators to learn of any web-based email sites or other online user accounts visited by the user. Then, through investigative methods such as the use of subpoenas and court orders, these and other individuals may be identified by law enforcement. Without going through this examination process, investigators are unable to learn of the existence of other email service(s) or online accounts being utilized by the suspect.

#### Encryption, Hiding or Disguising Files

Today, computers are also capable of disguising or hiding data to hinder or prohibit its detection. Computers are capable of encrypting and/or password protecting data so as to make it unretrievable by the average computer user. Some law enforcement agencies have in their possession computer software which will assist in breaking some forms of encryption and/or password protection, but the use of such software can be time consuming, depending upon the amount of data stored and the complexity of the encryption. Attempting to decrypt data is an extremely time and equipment intensive process requiring a laboratory environment to be done effectively. Some users will purposefully rename files with otherwise innocuous file names to deter curiosity seekers and others.

I know from my training and experience that commonly used digital devices, including but not limited to, smartphones, tablets and laptops, are portable devices. These mobile devices can be moved from one Wi-Fi connection to another with ease. It is not uncommon for a device to have been logged into more than one Wi-Fi connection per day.

I know from my training and experience that even if the files were deleted by a user, they still may be recoverable by a trained computer forensic examiner.

I know from training and experience that computers used to access the Internet usually contain files, logs, or file remnants which would tend to show ownership and use of the computer as well as ownership and use of Internet service accounts used for the Internet access.

I know from training and experience that search warrants of residences involved in computer

related criminal activity usually produce items that would tend to establish ownership or use of computers and ownership or use of any Internet service accounts accessed to commit financial and identity fraud to include credit card bills, telephone bills, correspondence, and other identification documents.

I know from training and experience that search warrants of residences usually reveal items that would tend to show dominion and control of the property searched, to include utility bills, telephone bills, correspondence, rental agreements, and other identification documents.

I know from training and experience that a person can access their home Wi-Fi from other areas on their property outside of the house where the router is located.

Although the IP Address used to access the internet will change, the IP Address artifacts and data contained on the device(s) may be recoverable by a trained computer forensic examiner.

# CONCLUSION

Based upon the above, there is probable cause to believe that a "computer system(s)" and/or			
digital(s) including but not limited to: cell phone(s), or computer(s) that have used the IP address			
ocated at the property of			
MA 02169 has or have been utilized to commit crimes in violation of Chapter 266 Section 37E			
(b)(c) (IDENTITY FRAUD), Chapter 266 Section 37 (FRAUDULENT CHECKS: DRAWING			
OR UTTERING), Chapter 266 Section 120F (UNAUTHORIZED ACCESS TO COMPUTER			
SYSTEM), and Chapter 90 Section 24B (STEALING OR FALSELY OBTAINING A			
MASSACHUSETTS DRIVERS LICENSE). There is also probably cause to believe that the			
fruits of the crime(s) committed at have been delivered, hidden, or stored at			
02169.			
I respectfully request that the Court issue a search warrant and order of seizure,			
authorizing the searches of			
02170 as described previously in the description of places			
to be searched.			
Signed under the penalties of perjury on this 10 <sup>th</sup> day of May, 2019.			
Trooper Cristina Lucin #3634			
Then personally appeared before me the above named Trooper Cristina Lucin and made oath that the foregoing affidavit by them subscribed is true, on this $10^{\rm th}$ day of May, 2019.			
Associate Justice/Clerk/Associate Clerk of			
the District Court			

New York State Intelligence Center 31 Tech Valley Drive 2<sup>nd</sup> Floor East Greenbush, New York 12061



Main: (518) 786-2100 FAX: (518) 786-9398 Toll-free: 866-486-9742

Migenee Ce

# Request for New York State Department of Motor Vehicle Image

# Requestor Details: Agency Name: Commonwealth Fusion Center - Massachusetts State Police Agency Address: 470 Worcester Rd, Framingham, MA Agency Phone: 978-451-3700 Name/Rank of Requestor: Shannan Barton - Intelligence Analyst Phone Number of Requestor: 978-451-3700 Case Number: Date of Request: 07/29/2019 **Subject Details:** Date of Birth: Name of Subject of Interest: DMV Client Identification #: Reason for Request (select one): ✓ Criminal Investigation Warrant Investigation Missing Person Investigation Witness Investigation I acknowledge that the requested image will not be used as filler in a photo array; that a printed hard copy of this image will be retained in the case folder; that a new request for a photo image must be made for any unrelated criminal investigation; that the digital image obtained will not be saved in a database or stored in any manner for secondary or subsequent use unrelated to the original investigation. I acknowledge that I will fully comply with the Driver's Privacy Protection Act of 1994 (18 USC §2721 et seq.), and all other applicable laws and regulations respecting access to and use of motor vehicle records. I further acknowledge that, per the Information Security Breach and Notification Act (General Business Law §899-aa and State Technology Law §208), I will make proper notifications in the event information has been acquired, or is reasonably believed to have been acquired, by an unauthorized person or a person without valid authorization. I hereby certify that the above requested DMV Photo Image is relevant to an active investigation, that the subject of interest possesses a driver's license, learner's permit or non-driver identification card issues by DMV, and acknowledge that if this request was made for an impermissible purpose I may be subject to administrative discipline and/or criminal prosecution.

1



# The Commonwealth of Massachusetts Department of State Police

CHARLES D. BAKER GOVERNOR

KARYN E. POLITO LIEUTENANT GOVERNOR

THOMAS A. TURCO, III SECRETARY

COLONEL KERRY A. GILPIN SUPERINTENDENT Fraud Identification Unit 10 Park Plaza 2<sup>nd</sup> Floor Boston, Massachusetts 02116

May 9th, 2019

To: Lt William Nolan #1636, Commanding, Fraud Identification Unit Sgt Christopher Boyle #2710, Supervisor, Fraud Identification Unit

From:

Trooper Cristina J. Lucin #3634, Fraud Identification Unit

Subject:

Case Number

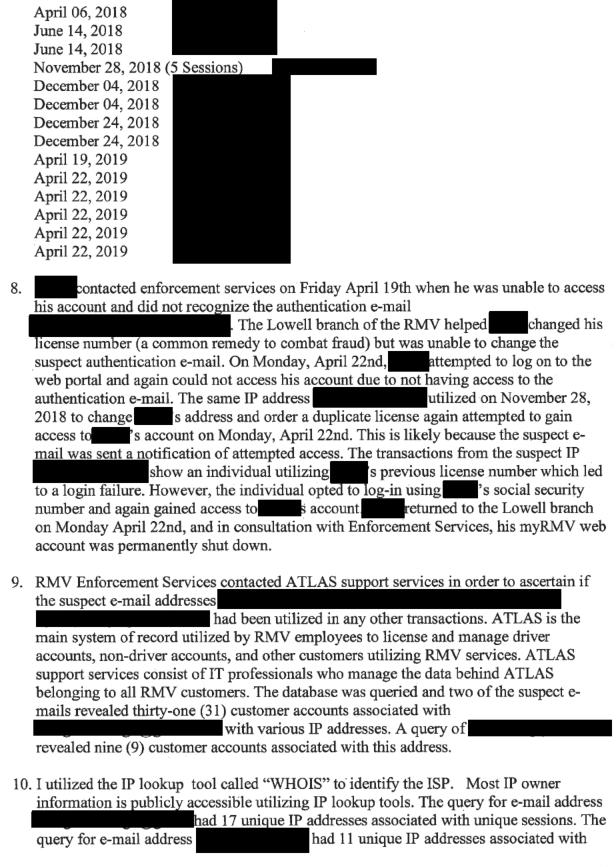
- 1. I, Cristina J. Lucin, am a Massachusetts State Trooper, presently assigned to the Fraud Identification Unit, sub-unit of the Division of Homeland Security and Preparedness. I have been a Massachusetts State Trooper since my graduation from the Massachusetts State Police Academy in March 2012. While attending the State Police Academy in New Braintree, MA, I received specialized training in criminal investigations. Prior to my current assignment, I was assigned as the Chief of Staff to the Deputy Superintendent of the Massachusetts State Police. Prior to serving as the Deputy's Chief of Staff, I was a uniformed Trooper in the Department of Field Services as a Patrol Trooper in Holden, MA and Boston, MA. I possess a Bachelor's Degree (B.S) in Criminology from Merrimack College (2010) and an Associate's Degree (A.S) in Cybersecurity from Bunker Hill Community College (2018). In 2017 I also earned my A+ certification through CompTIA industries (Computing Technology Industry Association).
- 2. My current assignment with the Fraud Identification Unit began in August 2017. Since that time, I have investigated hundreds of cases involving Identity Fraud, Document Fraud, and Benefit Fraud at the state and local level. The Fraud Identification Unit is colocated within the Massachusetts Registry of Motor Vehicles (RMV) enforcement services office. Many of our cases involve the use of Facial Recognition Technology to identify suspect identities within the Commonwealth of Massachusetts. The unit also investigates document fraud occurring within the Registry of Motor Vehicles licensing and vehicle registration division, as well as RMV employee corruption and theft cases.

3.	On Monday, April 22nd, 2019, I was informed of potentially fraudulent activity within
	the Registry of Motor Vehicles (RMV) computer systems. RMV enforcement services
	had taken a call from a customer on April 19th who had a suspended Massachusetts
	License. The customer identified themselves as (DOB:
	resides at and stated that his license had been
	suspended due to a bad check. further stated that he had received an e-mail that his
	myRMV account information had been changed, but he himself did not make those
	changes.

- 4. "myRMV" is a customer portal for the RMV which allows for over 40 transactions that can be completed online by a customer. If a customer needs to visit the RMV, myRMV will allow a customer to "Get Ready Online First" and potentially shorten their visit and wait times at any RMV branch location.
- 5. Enforcement Services reviewed 's account and discovered that an online myRMV account had been created on April 6th. 2018. On this date, an individual utilized the myRMV account portal, entered s name, date of birth, full social security number, and residential zip code. An e-mail address of was added as the authentication method. No other activity was present on the record until November 28th, 2018. On November 28th, 2018, someone other than gained access to the myRMV account, changed the mailing address to and requested a duplicate license. The replacement license is commonly referred to as a "Duplicate" costs 25 dollars. The duplicate request was paid for when the suspect entered routing information for EAST WEST BANK and an account number as an "eCheck" payment. myRMV provided confirmation of the transaction, showing a successful purchase of the duplicate license. Several days after this transaction, the eCheck bounced s license was suspended due to BAD CHECK PAYMENT of 25.00 to the registry.
- 6. When a myRMV account is configured via the web portal, a customer must select an authentication method. Two-factor authentication (2FA) is an additional layer of protection utilized by online services to verify an individual's identity. myRMV allows a user to select 2FA with a phone number or e-mail address. When the myRMV account belonging to was created, an authentication e-mail was provided:

  stated that he had never heard of that e-mail address, nor had he utilized that e-mail address at any time. On November 28, 2018, the day the duplicate license was ordered the authentication e-mail was changed to

  On December 24, 2018, the authentication e-mail was changed to was asked if either of those e-mails belonged to him and he stated that he had never utilized those e-mails.
- 7. Several IP addresses are associated with "sessions" which represent different connections between this user account and the myRMV system. The myRMV system contains licensing and vehicle registration data for the entire RMV database. The following IP addresses were utilized on saccount:



unique sessions. Two IP Addresses are associated with both e-mail addresses

A subpoena was submitted to COMCAST Internet
Service Provider (ISP) on April 22nd, 2019 by the Massachusetts Attorney General's
Office for the following four IP addresses/dates that were associated with these suspect transactions:

assigned from 12/20/2018 at 08:26 EST to 03/23/2019 at 08:52 ET.
assigned on 12/07/2018 at 05:27 EST and on 04/17/2019 at 08:46 ET

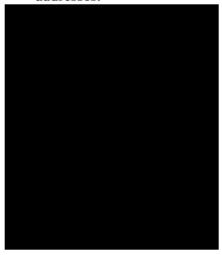
ssigned on 11/18/2018 at 23:37 EST, 11/19/2018 at 13:30 EST, and on

01/22/2019 at 07:39 EST. 24.218.72.112 assigned on 04/17/2019 at 05:38 ET.

- 11. COMCAST provided results to the subpoena request (see attached documents) identifying the following physical addresses:
  - a. b. c. d.
- 12. A query through the RMV ATLAS system revealed additional compromised records based on the above IP addresses:



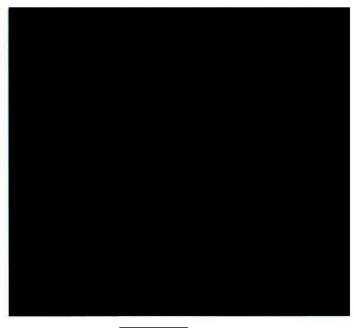
13. In addition to the above IP addresses, the following electronic mail addresses were associated with fraudulent customer transactions. A subpoena and preservation order is pending to determine the owner/location information associated with these e-mail addresses:



14.	The above lists above are not exhaustive. At this time, the Fraud Identification Unit
	suspects that over 200 individual accounts have been compromised via the methods listed
	above.

- 15. The subpoena request above identified as the physical address associated with logical IP address for the given dates and times of suspect transactions. A total of 138 associated customer accounts were accessed from the period of time between July 2018 and present.
- 16. Compromised accounts were differentiated from victim accounts by the activity on the records. The accounts where customer information was changed was considered victim accounts. Some of these victims have had changes of mailing address, and duplicate or renewal licenses mailed to their own address or another address added by the suspect.
- 17. I identified 21 victim accounts where a bad payment was present on the myRMV record. "Bad Payment" represents a payment for RMV services made through myRMV that was returned or "bounced". On these 21 records, a bad payment was made in the form of "eCheck" or Electronic Check. An electronic check is an electronic version of a paper check used to make payment online. To make a payment with an eCheck, a customer needs to provide the following information: Bank routing number, Bank account number, Name on your bank account.
- 18. The Registry of Motor Vehicles offers two ways for customers to pay for online transactions: eCheck or credit/debit card. All 21 victims referenced above had a replacement license ordered from myRMV paid for via eCheck. The Massachusetts RMV does not require the user to provide the name on the bank account when an eCheck is submitted. Instead, the user of a myRMV account only needs to provide routing number and account number. If a transaction is successful, the user is provided with a confirmation page and the pending replacement license request is initiated. Replacement licenses should be delivered within seven to ten business days.

19.	One of the customer accor	ants linked to the IP address		belongs to an
	individual by the name of	(DOB:	):	



RMV Photo of (Image taken 1/13/2017)

- 20. can be described as an young Asian male, approximately 5 feet and 8 inches tall, with a medium to heavy build. lists as mailing address via the Registry of Motor Vehicles. The same address is listed as his residential address beginning January 13th, 2017 until November 19th, 2018, when it is changed to a commercial business known as "Crystal Foot Care". also has one vehicle registered with the same residential/mailing information: a 2014 Range Rover Sport Utility Vehicle with registration number "IC58MM".
- 21. A police report obtained from Norwood Police identifies as living as of October 31st, 2018. On this date, Norwood police in reference to fraudulent purchases made at the interviewed \ Jaguar and Land Rover dealership in Norwood, Massachusetts. According to the report, reported to Norwood Police that she was an individual named noticed that her CITIBANK credit card had the victim of identity fraud. been utilized at the Jaguar and Land Rover dealership on 449 Neponset Street in Norwood. Jaguar/Land Rover provided the investigating officers with an invoice showing a purchase of one oil filter and brake kit for a total of \$476.75. The name on the vehicle account was with a given address of 1 On old Norwood detectives that he resided at October 31st, 2018 with his parents.
- 22. On April 30th, 2019 at 1650 hours, May 1st, 2019 at 0530 hours, May 1st, 2019 at 1031 hours, and May 7th at 1700 hours, the 2014 white Range Rover registered to

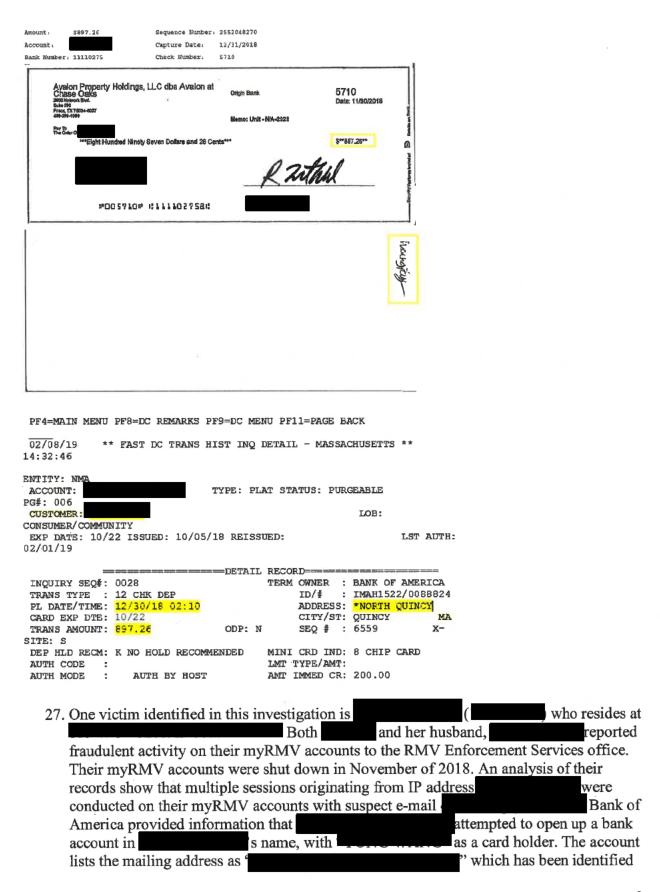
was observed by Troopers in the Fraud Identification Unit parked outside the building identified as

- 23. Based on my training and experience within the Fraud Identification Unit, I have identified various motives for those seeking to fraudulently obtain a Massachusetts issued Driver's License, Learner's Permit, Identification Card, or Liquor ID. Some of those motives include:
  - a. Right to drive/operate a motor vehicle both State and Federally
  - b. Establishes legal residency status within a state or federally
  - c. Identification necessary to open banking/checking accounts
  - d. "Clean" identity to cover up extensive criminal history or arrest warrants
  - e. Right to travel via bus, train, or airplane within the United States
  - f. Human trafficking/smuggling operators seeking valid identities to conceal victims from Law Enforcement
- 24. The bad check/returned eChecks present on victim records demonstrate a utilization of fraudulent financial means to obtain these credentials. In addition to bad checks, customers have reported having credit cards opened in their names and without their authorization as well as credit report alerts of activity associated with addresses other than their own. The investigation to date has led to bad checks from the following financial institutions: Bank of America, J.P. Morgan Chase, T.D. Bank
- 26. Bank of America Investigators provided detailed banking records showing that had been observed on ATM surveillance depositing a bad check. The following images were provided by Bank of America and show depositing a fraudulent check into his personal checking account. Note that the check is also endorsed by





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in this investigation as a possible drop address. The following information was provided by Bank of America and lists the client IP address as



28. Based on the facts above, I believe is utilizing the Personally Identifiable Information (III) of other Massachusetts residents to commit Identity Fraud and Financial Fraud. has utilized PII and fraudulent banking accounts to order and have delivered Massachusetts Driver's Licenses which aid in this fraud.

Several victims of identity fraud connected to our investigation and connected to the investigations of Quincy Police, Braintree Police, and Milton Police claim that they were signed up for Informed Delivery. According to the United States Postal Service, informed delivery is "a free and optional notification service that gives residential consumers the ability to digitally preview their letter-sized mailpieces and manage their packages scheduled to arrive soon. Informed Delivery allows users to view what is coming to their mailbox on a computer, tablet or mobile device. To automate the sortation and delivery of mail, the United States Postal Service (USPS) digitally images the front of letter-sized mailpieces that run through automation equipment. USPS is now using those images to provide digital notifications to users in advance of the delivery of physical mail.

The Massachusetts State Police Fraud Identification Unit has worked another case in conjunction with the USPS Mail Inspectors in which informed delivery was utilized to aid criminals in stealing mail from an individual's mailbox without their knowledge. The evidence gathered in this case shows that Informed Delivery is likely one method being used by a suspect or suspects to conceal the fruits of the fraud they commit. Specifically, as it relates to fraudulent license duplicate orders, I believe is utilizing Informed Delivery to obtain Massachusetts Driver's Licenses fraudulently obtained without the knowledge of the home owner. Bank of America account information belonging to show charges of \$1.00 on his account for mailing address changes with the USPS.

#### **CONCLUSION**

I am requesting that the court issue an arrest warrant for	DOB
be issued. He is being charged with the following offenses:	

Chapter 266 Section 37 (FRAUDULENT CHECKS: DRAWING OR UTTERING) (24 counts)

Chapter 266 Section 37E (b)(c) (IDENTITY FRAUD)

Chapter 266 Section 120F (UNAUTHORIZED ACCESS TO COMPUTER SYSTEM) (149 counts)

Chapter 90 Section 24B (STEALING OR FALSELY OBTAINING A MASSACHUSETTS DRIVERS LICENSE) (24 counts)

Signed under the penalties of perjury on this 9th day of May, 2019.

Respectfully Submitted,

Trooper Cristina J. Lucin #3634 Fraud Identification Unit Massachusetts State Police