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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
JANUARY 2016 GRAND JURY

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JAROL GARCIA,  
  
Defendant.

CR No. 16 **CR 16-0608**  
I N D I C T M E N T  
[18 U.S.C. § 371: Conspiracy; 18  
U.S.C. § 1708: Possession of  
Stolen Mail]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing until on or about December 9, 2015, in Riverside County, within the Central District of California, and elsewhere, JAROL GARCIA ("defendant GARCIA"), unindicted Co-conspirator A ("Co-Conspirator A"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally commit offenses against the United States, namely, mail theft and possession of

1 stolen mail, in violation of Title 18, United States Code, Section  
2 1708.

3 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
4 ACCOMPLISHED

5 The objects of the conspiracy were to be accomplished, in  
6 substance, as follows:

7 1. Defendant GARCIA would be employed as a mail handler at the  
8 Moreno Valley Delivery Distribution Center ("MVDDC"), located at  
9 23800 Cactus Avenue, in Moreno Valley, California.

10 2. Defendant GARCIA, while working at the MVDDC, would steal  
11 valuable mail items, primarily consisting of cellular telephones,  
12 from parcels processed at the MVDDC.

13 3. Defendant GARCIA would use a website, Offerup.com (the  
14 "Offerup Website"), to exchange the mail items he stole from the  
15 MVDDC for other valuable items from users of the Offerup Website,  
16 including Co-Conspirator A.

17 4. Defendant GARCIA and Co-Conspirator A would exchange text  
18 messages to discuss items to trade and the location where the trades  
19 would take place.

20 5. Defendant GARCIA and Co-Conspirator A would meet at an  
21 agreed upon location and trade the agreed upon items, which would  
22 consist of stolen mail items from MVDDC (from defendant GARCIA) and  
23 valuable items such as tickets and shoes (from Co-Conspirator A).

24 C. OVERT ACTS

25 In furtherance of the conspiracy and to accomplish its object,  
26 on or about the following dates, defendant GARCIA, Co-Conspirator A,  
27 and other co-conspirators, committed various overt acts within the  
28

1 Central District of California, and elsewhere, including, but not  
2 limited to, the following:

3 Overt Act No. 1: On or about August 12, 2015, defendant  
4 GARCIA opened multiple mail parcels while working at MVDDC.

5 Overt Act No. 2: On or about August 12, 2015, defendant  
6 GARCIA removed what appeared to be a cellular telephone from a parcel  
7 he opened while working at MVDDC.

8 Overt Act No. 3: On or about August 13, 2015, defendant  
9 GARCIA opened multiple parcels while working at MVDDC.

10 Overt Act No. 4: On or about August 13, 2015, defendant  
11 GARCIA removed what appeared to be a cellular telephone from a parcel  
12 he opened while working at MVDDC.

13 Overt Act No. 5: On or about August 18, 2015, defendant  
14 GARCIA opened multiple parcels while working at MVDDC.

15 Overt Act No. 6: On or about August 18, 2015, defendant  
16 GARCIA removed multiple cellular telephones from parcels he opened  
17 while working at MVDDC.

18 Overt Act No. 7: On or about November 11, 2015,  
19 defendant GARCIA and Co-Conspirator A communicated via text message  
20 to set up a meeting time and place to trade cellular telephones  
21 stolen from the mail for shoes and glasses.

22 Overt Act No. 8: On or about November 11, 2015,  
23 defendant GARCIA and Co-Conspirator A met at a Target store, located  
24 at 3527 West Florida Avenue, in Hemet, California to trade cellular  
25 telephones stolen from the mail for shoes and glasses.

26 Overt Act No. 9: On or about November 20, 2015,  
27 defendant GARCIA and Co-Conspirator A communicated via text message  
28

1 to discuss a date and time to meet to exchange cellular telephones  
2 stolen from the mail for shoes.

3 Overt Act No. 10: On or about November 21, 2015,  
4 defendant GARCIA and Co-Conspirator A communicated via text message  
5 to discuss a date and time to meet to exchange cellular telephones  
6 stolen from the mail for shoes.

7 Overt Act No. 11: On or about November 23, 2015,  
8 defendant GARCIA communicated with Co-Conspirator A via text message  
9 to discuss meeting later that day.

10 Overt Act No. 12: On or about November 30, 2015,  
11 defendant GARCIA communicated with Co-Conspirator A via text message  
12 to discuss meeting later that day.

13 Overt Act No. 13: On or about December 9, 2015, defendant  
14 GARCIA opened multiple parcels while working at MVDDC.

15 Overt Act No. 14: On or about December 9, 2015, defendant  
16 GARCIA removed multiple cellular telephones from parcels he opened  
17 while working at MVDDC.

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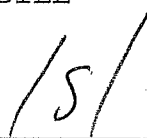
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COUNT TWO

[18 U.S.C. § 1708; 18 U.S.C. § 2(a)]

On or about December 9, 2015, in Riverside County, within the Central District of California, and elsewhere, defendant JAROL GARCIA ("defendant GARCIA") unlawfully possessed mail matter that had been stolen from the United States mail, namely, at least approximately 166 cellular telephones, and at that time and place, defendant GARCIA knew that said mail was stolen.


A TRUE BILL



\_\_\_\_\_  
Foreperson

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