

United States District Court

SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

PIKERSON MENTOR
and SAUBNET DWAYNE POLITASSE,

CASE NUMBER: 11-2563-Goodman

I, Juan Vargas, the undersigned complainant, being duly sworn state the following is true and correct to the best of our knowledge and belief: On or about December 6, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants, Pikerson MENTOR and Saubnet Dwayne POLITASSE did commit the following crimes:

(a) the defendants, knowingly killed an employee of the United States, with malice aforethought, while such officer or employee was engaged in the performance of his official duties, in violation of Title 18, United States Code, Sections 1114, 1111 and 2.

(b) the defendants with intent to cause death or serious bodily harm, knowingly and intentionally took a motor vehicle that had been transported, shipped, or received in interstate or foreign from the person or presence of another by force and violence or intimidation, and resulting in death, in violation of Title 18, United States Code, Section 2119;

(c) the defendants did knowingly and intentionally steal a key from the U.S. Postal Service to a lock box, lock drawer, or other authorized receptacle for the deposit or delivery of mail matter, in violation of Title 18, United States Code, Section 1704 and 2;

(d) the defendants did knowingly possess a firearm in furtherance of a crime of violence in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2, and in the course of such violation cause the death of another person, in violation of Title 18, United State Code, Sections 924(j) and 2;

(e) the defendants did knowingly and willfully conspire to commit an offense against the United States, as set forth above, and did commit an act to effect the object of the conspiracy, in violation of Title 18, United State Code, Section 371.

I further state that I am a United States Postal Inspector with the United States Postal Inspection Service and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT
Certified to be a true and correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By [Signature]
Date 5-5-11

[Signature]
JUAN VARGAS, U.S. POSTAL INSPECTOR
UNITED STATES POSTAL INSPECTION SERVICE

Sworn to before me, and subscribed in my presence,
Date 5-5-11 Deputy Clerk

May 5, 2011

Date

at 12:57 PM

Miami, Florida
City and State

JONATHAN GOODMAN
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

AFFIDAVIT OF INSPECTOR JUAN VARGAS.

Your affiant, Juan Vargas, being duly sworn, state the following:

1. I am a United States Postal Inspector and have been so employed since January 1999.

As part of my duties, I investigate violent crimes committed against United States Postal Employees and the use of the United States Mail, to include identity takeover, bank fraud, access device fraud, and forging securities of the states and private entities.

2. On December 6, 2010, Bruce Parton (hereinafter, "the victim") was employed as a letter carrier with the United States Postal Service. On that date, the victim was working his postal route. During the course of his duties, the victim arrived at the Monte Carlo Condominiums, located at 482 N.W. 165th Street, Miami, Florida. The victim got out of his assigned postal vehicle, a Grummen Mail Service Truck (#7205895), and walked into the complex to deliver and pickup mail. While inside the complex, the victim was shot twice by an assailant and died at the scene. The assailant stole the victim's U.S Postal Key and the keys to his postal vehicle. Two witnesses saw the postal truck being driven away from the crime scene at a high rate of speed, shortly after they heard shots from inside the Monte Carlo Condominium complex. The truck was found abandoned on the northwest side of the Golden Gate Apartment Condominiums, located at 16450 N.W. 2nd Avenue, Miami, FL 33169. The victim's postal key was missing after the robbery. Postal keys are used by letter carriers to open and close mailboxes.

3. After the robbery, investigators received an anonymous tip that a person named Diddy, a person named Gangsta, and another person committed the murder for the purpose of stealing the victim's mail key. According to the tipster, Diddy shot the mail carrier for his mail box key, which Diddy wanted to use for tax fraud. The caller reported that Diddy was accompanied by

Gangsta and another person. Information provided by the caller included a description of the getaway vehicle used by the three men, which was described as a silver two door Cadillac bearing Florida license plate number 590-LYM.

4. Investigators collected and reviewed surveillance videos from businesses along the victim's December 6th postal route. A camera in the vicinity of the CitiCentre office building located at 290 N.W. 165th Street, Miami, captured a silver two door Cadillac following the victim's postal vehicle. Surveillance video showed the victim exiting the CitiCentre office building in his postal truck at approximately 1:35PM heading towards the Monte Carlo Condominiums. At approximately 1:36PM video surveillance shows a silver two-door Cadillac exiting the CitiCentre over flow parking lot proceeding to follow victim. After the shooting, at approximately 2:46PM, video surveillance shows the victim's postal truck drive by the CitiCentre Office building and approximately six seconds later the silver two-door Cadillac follows.

5. An inquiry into the Miami-Dade Police Department Booking Records and Field Interview system revealed that on December 14, 2007, Pikerson MENTOR was interviewed by Miami-Dade Police. During the interview, Mentor identified his nickname as "Diddy". An inquiry into the Miami-Dade Police Department Booking Records and Field Interview system also revealed that on March 15th, 2006, Saubnet Dwayne POLITASSE was interviewed by Miami-Dade Police. During the interview, Politasse identified his nickname as "Gangsta".

6. An inquiry with the Driver and Vehicle Information Database (DAVID) maintained by the Florida Division of Highway Safety & Motor Vehicles (DHSMV) revealed that the silver two-door Cadillac bearing Florida license plate number 590-LYM was registered to a rent-a-car agency (Avis).. Avis documents revealed that the silver Cadillac was rented to a female on November 19th, 2010. While the female rented the vehicle, an inquiry into the Florida Comprehensive Case

Information System (FLCCIS) revealed that on December 31, 2010, Pikerson Mentor was issued a traffic citation in the silver Cadillac bearing Florida license plate number 590-LYM. When the vehicle was returned to Avis after mechanical difficulties, a store video camera captured MENTOR and the female waiting together outside the business for a replacement vehicle.

7. An inquiry into the Inspection Service Database, National Crime Information Center, Byron Police Department in Georgia, and other law enforcement databases revealed that on May 22, 2007, Pikerson Mentor was arrested in Georgia with another individual for having stolen credit cards in the vehicle (the charge against MENTOR was dropped). That other individual was ultimately charged and convicted in an unrelated federal case with mail fraud. Review of that inmate's email messages from the Federal Detention Center (FDC) in Miami indicated that on December 3, 2010, that inmate sent an email to a third party asking that party to provide him with Diddy's telephone number. The responding email stated: "786XXXX528¹ is Diddy" (hereinafter, Telephone 528).

8. When a cellular telephone makes or receives a call, that cellular telephone will generally use the closest unobstructed cell tower closest to place or receive that call. Cellular telephone companies record and store that information as part of their regular business practice. Thus, by reviewing a particular cellular telephones cell site records, it is possible to determine the general geographic area where that cellular telephone made, or received, a particular telephone call.

9. Cell Tower records for Telephone 528 indicate that on December 6, 2010, a call was placed from Telephone 528, at approximately 2:45 p.m., to a cellular telephone with the number (786) XXX-X112 (hereinafter, Telephone 112). Both telephones registered on the cellular tower approximately 500 yards from where the victim was murder.ed The second telephone (Telephone 112) belongs to POLITASSE, as indicated below.

¹ This number has been redacted by your affiant.

10. A video from a WinnDixie store on February 11, 2011, shows both MENTOR and POLITASSE together in the store using fraudulently obtained debit cards to purchasing money orders. The fraud revealed by contact with BankCorp, the company responsible for the debit card, and the Winn Dixie transaction records.

11. On the date of the robbery/murder (December 6, 2010), two witnesses reported to law enforcement that they were outside the apartment complex when the mail truck arrived. The witnesses stated the victim drove the truck inside the complex. A short time later, both witnesses heard shots fired. The witnesses then saw the mail truck leaving the complex at a high rate of speed, driven by a black male that was not the victim.

12. On April 27, 2011, law enforcement separately showed each witness a six-person photographic lineup containing MENTOR's photograph. One of the two witnesses identified MENTOR's photograph as the person driving the mail truck away from the complex after the shots were fired. The witness memorialized her identification with her signature, the date, circling Mentor's photograph, and writing "this is the guy in mail truck" on the six person photographic lineup. The other witness was unable to make an identification.

13. On May 4, 2011, North Miami Police Department officers stopped a car with dark tints in the North Miami area. Upon approaching, an officer or officers smelled a strong order of marijuana coming from inside the vehicle. The driver was identified as POLITASSE, who indicated he did not have a driver's license, as confirmed by a records check. POLITASSE was arrested for driving without a license. The passenger in the vehicle was frisked and the officer recovered a small quantity of marijuana and a Green Dot prepaid debit card from his person. The car was a registered rental, which when the officers contacted the rental agency, they were informed that POLITASSE

was not the authorized driver of the vehicle, that this was the second time the vehicle was towed, and that the officers should impound the vehicle.

14. Inside the car, under the driver's seat, an officer discovered a unique looking key. That officer showed the key to his supervisor, who contacted Inspector Vargas and told Inspector Vargas that the key appeared to be a U.S. Postal key, but that the serial number had been scraped off. Your affiant and other investigators traveled to the North Miami Police Department station and confirmed that the recovered key is indeed a U.S. Postal Mail key, with an obliterated serial number.

15. POLITASSE was transported to the Miami Dade Police Department, where he was read and waived his *Miranda* rights. During questioning, POLITASSE initially denied being Gangsta, but later when told about some of the evidence in this case, POLITASSE admitted his nickname, owning cellular telephone 112 (which was recovered on his person when he was arrested), and then admitted being present during the December 6 crime. According to POLITASSE, he and another person were in the car with MENTOR. POLITASSE said that MENTOR pulled up to the complex, that MENTOR entered the complex on foot, that POLITASSE then heard two shots, and then saw MENTOR fleeing the complex driving a mail truck at a high rate of speed. POLITASSE admitted driving after MENTOR in MENTOR's silver two-door Cadillac and picking up MENTOR next to the mail truck. According to POLITASSE, when he and the other occupant asked what was going on, MENTOR told them that he had the keys. POLITASSE admitted later using the key with MENTOR to open up apartment mail boxes for the purpose of stealing mail and engaging in identity theft. POLITASSE denies knowing that MENTOR was going to commit the robbery before it happened, even when he was confronted with evidence showing the silver car following the truck from 1:06 p.m., up until the murder happened an hour later.

16. Around midnight on May 5, 2011, MENTOR was arrested driving a rental car and driven to the Miami-Dade Police Station. After waiving his Miranda rights, MENTOR was questioned about the murder of the victim. MENTOR stated that he remembered the murder from seeing it on the news and that on the day that the mailman was murdered, MENTOR said he was nowhere near the apartment complex where the murder occurred. When asked if he knew what had been stolen, MENTOR responded "the key." The theft of the mail key is a detail of the robbery that has never been released to the press or general public.

17. The postal truck which was stolen on December 6, 2010, was previously shipped to Miami from Tennessee. Therefore, that postal truck is a vehicle that has moved in interstate commerce.

18. Based on the foregoing facts, your affiant respectfully submits there is probable cause to arrest MENTOR and POLITASSE for the following crimes in Miami Dade County, in the Southern District of Florida:

(a) On December 6, 2010, in Miami Dade County, in the Southern District of Florida the defendants, MENTOR and POLITASSE, knowingly killed an employee of the United States, with malice aforethought, while such officer or employee was engaged in the performance of his official duties, in violation of Title 18, United States Code, Sections 1114, 1111 and 2.

(b) On December 6, 2010, MENTOR and POLITASSE, with intent to cause death or serious bodily harm, knowingly and intentionally took a motor vehicle that had been transported, shipped, or received in interstate or foreign from the person or presence of another by force and violence or intimidation, and resulting in death, in violation of Title 18, United States Code, Section 2119;

(c) On December 6, 2010, MENTOR and POLITASSE did knowing and intentionally steal a key from the U.S. Postal Service to a lock box, lock drawer, or other authorized receptacle for the deposit or delivery of mail matter, in violation of Title 18, United States Code, Section 1704 and 2;

(d) On December 6, 2010, MENTOR and POLITASSE did knowingly possess a firearm in furtherance of a crime of violence in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2, and in the course of such violation cause the death of another person, in violation of Title 18, United States Code, Sections 924(j) and 2;

(e) On December 6, 2010, MENTOR and POLITASSE did knowingly and willfully conspire to commit an offense against the United States, as set forth above, and did commit any act to effect the object of the conspiracy, in violation of Title 18, United States Code, Section 371.

19. This affidavit is based upon events known personally to me, or information provided to me by other law enforcement personnel. The affidavit is intended only for the limited purpose of establishing probable cause for the offenses set forth above. Therefore, this affidavit does not include every fact that is known to me or to law enforcement about this ongoing investigation.

FURTHER YOUR AFFIANT SAYETH THAT

Depledge to be true and correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By *[Signature]*
Date 5-5-11 Deputy Clerk

[Signature]
U.S. POSTAL INSPECTOR JUAN VARGAS
U.S. POSTAL INSPECTION SERVICE

Subscribed and sworn to before me in Miami, Florida, on May 5, 2011.

[Signature]
JONATHAN GOODMAN
UNITED STATES MAGISTRATE JUDGE - SDFL

12:57 PM