

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No. 15-cr-290 RBJ

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ANGELICA SANTILLANO,
2. FRANK ROBERT KING,
3. ALEXANDER SAUL KING, and
4. MANUEL MAX VELASQUEZ,

Defendants.

INDICTMENT

Count One
Conspiracy, 18 U.S.C. § 371

Counts Two and Three
Aggravated Identity Theft, 18 U.S.C. § 1028A

Count Four
Theft of Mail Matter, 18 U.S.C. § 1708

Count Five
Possession of Counterfeit Postal Key, 18 U.S.C. § 1704

Counts Six and Seven
Felon in Possession of a Firearm, 18 U.S.C. § 922(g)(1)

Counts Eight and Nine
Possession of a Controlled Substance, 21 U.S.C. § 844(a)

The Grand Jury Charges:

Count One

Beginning in and around October 25, 2014, and continuing through on or about April 25, 2015, in the State and District of Colorado and elsewhere, the defendants, ANGELICA SANTILLANO, FRANK ROBERT KING, ALEXANDER SAUL KING, and MANUEL MAX VELASQUEZ, knowingly and willfully conspired and agreed with each other and others, known and unknown, to commit acts and offenses against the laws of the United States, namely bank fraud, the possession and production of counterfeit mail keys, and mail theft, in violation of Title 18, United States Code, Sections 1344, 1704, 1708, and there was interdependence among the members of the conspiracy.

Purpose of the Conspiracy

The purpose of the conspiracy was for the conspirators to enrich and support themselves and their methamphetamine use by stealing mail, using other people's identities, and depositing and cashing checks belonging to other people.

Manner and Means of the Conspiracy

During all times relevant to the Indictment, it was part of the conspiracy that:

1. Conspirators drove each other to mail boxes around the Denver metropolitan area to steal mail.
2. Conspirators made counterfeit arrow keys to open mail boxes and steal mail.
3. Conspirators opened bank accounts in order to have an account into which to deposit stolen and counterfeit checks.
4. Conspirators stole checks and personal identifying information from victims, altered or counterfeited those checks, and deposited and cashed those checks for their own financial gain.

Overt Acts

In furtherance of the conspiracy and to effect its objects, at least one of the conspirators committed at least one of the following acts:

1. On or about October 25, 2014, the defendants, ANGELICA SANTILLANO and FRANK ROBERT KING, made a purchase in the amount of \$245.60 at a Home Depot in Littleton, Colorado, using the 1st Bank debit card account number of a person with the initials J.T.
2. On or about October 26, 2014, the defendant, ALEXANDER SAUL KING, made a purchase in the amount of \$129.45 at a Walmart in Aurora, Colorado, using the 1st Bank debit card account number of a person with the initials J.T.
3. On or about December 15, 2014, the defendant, ANGELICA SANTILLANO, cashed a \$450.00 check at a Denver branch of the Partner Colorado Credit Union written on the account of a person with initials D.B.
4. On or about December 15, 2014, the defendant, MANUEL MAX VELASQUEZ, attempted to cash a \$475.00 check at the Denver branch of Partner Colorado Credit Union written on the account of a person with initials D.B.
5. On or about December 30, 2014, the defendant, ALEXANDER SAUL KING, possessed mail addressed to other people, including credit card and bank statements, utility bills, and correspondence from the Department of Revenue, along with credit cards carrying another person's name, multiple counterfeit arrow keys, a firearm, ammunition, and methamphetamine.
6. On or about January 6, 2015, the defendant, ANGELICA SANTILLANO, cashed a \$750.00 check at the Arvada branch of Westerra Credit Union written on the account of a person with initials D.K.
7. On or about January 6, 2015, the defendant, ALEXANDER SAUL KING, cashed a

\$450.00 check at the Denver branch of Westerra Credit Union written on the account of a person with initials D.K.

8. On or about January 6, 2015, the defendant, ALEXANDER SAUL KING, presented a Colorado Department of Motor Vehicle Identification of a person with the initials B.B. at the Denver branch of the Westerra Credit Union.

9. On or about March 11, 2015, the defendants, ANGELICA SANTILLANO and FRANK ROBERT KING, possessed garbage bags filled with mail addressed to other people in a hotel room in Aurora, Colorado.

10. On or about April 3, 2015, the defendant, ALEXANDER SAUL KING, possessed a large quantity of mail, U.S. postal locks, mailbox door panels, and a glass pipe commonly used to smoke methamphetamine.

11. On or about April 18, 2015, the defendant, ALEXANDER SAUL KING, made a purchase at a WalMart in Thornton, Colorado, using the CitiBank credit card account of a person with the initials C.B.

12. On or about April 19, 2015, the defendant, MANUEL MAX VELASQUEZ, made a purchase at a WalMart in Thornton, Colorado, using the CitiBank credit card account of a person with the initials C.B.

13. On or about April 25, 2015, the defendant, ALEXANDER SAUL KING, sent a text message to the defendant, MANUEL MAX VELASQUEZ, asking for “help going thru mail.”

14. On or about April 25, 2015, the defendant, MANUEL MAX VELASQUEZ, sent a text in response to the defendant, ALEXANDER SAUL KING, stating “OK where u at bro.”

Count Two

18 U.S.C. § 1028A

On or about January 6, 2015, in the State and District of Colorado, the defendant, ALEXANDER SAUL KING, did knowingly possess and use, without lawful authority, a means of identification of another person, during and in relation to the commission of bank fraud, in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

Count Three

18 U.S.C. § 1028A

On or about January 6, 2015, in the State and District of Colorado, the defendant, ANGELICA SANTILLANO, did knowingly possess and use, without lawful authority, a means of identification of another person, during and in relation to the commission of bank fraud, in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

Count Four

18 U.S.C. § 1708

On or about March 11, 2015, in the State and District of Colorado, the defendants, ANGELICA SANTILLANO and FRANK ROBERT KING, did knowingly have in their possession a letter and mail which had been stolen and taken from out of a mailbox and mail receptacle and authorized depository for mail matter, knowing it to have been stolen.

All in violation of Title 18, United States Code, Section 1708.

Count Five

18 U.S.C. § 1704

On or about May 3, 2015, in the State and District of Colorado, the defendant, ALEXANDER SAUL KING, did knowingly possess a key adopted by the Postal Service and in

use on lock boxes or other authorized receptacles for the deposit of mail matter, with the intent unlawfully and improperly to use the same.

All in violation of Title 18, United States Code, Section 1704.

Count Six

18 U.S.C. § 922(g)(1)

On or about March 11, 2015, in the State and District of Colorado, the defendant, FRANK ROBERT KING, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did unlawfully and knowingly possess a firearm and ammunition, in and affecting interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

Count Seven

18 U.S.C. § 922(g)(1)

On or about December 30, 2014, in the State and District of Colorado, the defendant, ALEXANDER SAUL KING, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did unlawfully and knowingly possess a firearm and ammunition, in and affecting interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

Count Eight

21 U.S.C. § 844(a)

On or about March 11, 2015, in the State and District of Colorado, the defendant, FRANK ROBERT KING, did knowingly and intentionally possess a controlled substance listed in Title 21, United States Code, Section 812, and the regulations enacted thereunder, namely methamphetamine, a schedule II controlled substance.

All in violation of Title 21, United States Code, Section 844(a).

Count Nine

21 U.S.C. § 844(a)

On or about December 30, 2014, in the State and District of Colorado, the defendant, ALEXANDER SAUL KING, did knowingly and intentionally possess a controlled substance listed in Title 21, United States Code, Section 812, and the regulations enacted thereunder, namely methamphetamine, a schedule II controlled substance.

All in violation of Title 21, United States Code, Section 844(a).

Forfeiture Allegation

1. The allegations contained in Counts One through Nine of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C), 924(d), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the violation alleged in Count One of this Indictment, involving a conspiracy to violate Title 18, United States Code, Sections 1344, 1704, 1708, in violation of Title 18, United States Code, Section 371, defendants ANGELICA SANTILLANO, FRANK ROBERT KING, ALEXANDER SAUL KING, and MANUEL MAX VELASQUEZ shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all of the defendants' right, title and interest in all property constituting and derived from any proceeds the defendants obtained directly and indirectly as a result of such offense, including, but not limited to: A money judgment in the amount of proceeds obtained by the conspiracy and by the defendants, for which the defendants are joint and severally liable.

3. Upon conviction of the violation alleged in Count Four of this Indictment involving a violation of Title 18, United States Code, Section 1708, defendants ANGELICA SANTILLANO and FRANK ROBERT KING shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all of the defendants' right, title and interest in all property constituting and derived from any proceeds the defendants obtained directly and indirectly as a result of such offense, including, but not limited to: A money judgment in the amount of proceeds obtained by the defendants, for which the defendants are joint and severally liable.

4. Upon conviction of the violation alleged in Count Six of the Indictment involving a violation of Title 18, United States Code, Section 922(g)(1), defendant FRANK ROBERT KING shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to the following:

- a) One Hi-Point JH Pistol, Serial Number 311843 (partially obliterated)

5. Upon conviction of the violation alleged in Count Seven of the Indictment involving a violation of Title 18, United States Code, Section 922(g)(1), defendant ALEXANDER SAUL KING shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to the following:

- a) One Skyy CPX-1Pistol, Serial Number 001746

6. If any of the property described above, as a result of any act or omission of the defendants:

- a) cannot be located upon the exercise of due diligence;

- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

A TRUE BILL

Ink signature on file in Clerk's Office
FOREPERSON

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United States Attorney

s/ Beth Gibson
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DEFENDANT: ANGELICA SANTILLANO

YOB: 1985

ADDRESS (CITY/STATE): Adams County, CO

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:** 18 U.S.C. § 371 Conspiracy
COUNT THREE: 18 U.S.C. § 1028A Aggravated Identity Theft
COUNT FOUR: 18 U.S.C § 1708 Theft of Mail Matter

LOCATION OF OFFENSE (COUNTY/STATE): Adams County, Colorado

PENALTY: **COUNT ONE:** NMT 5 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT THREE: NMT 2 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT FOUR: NMT 5 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

AGENT: Special Agent Rachel Sileski
United States Postal Inspection Service

AUTHORIZED BY: Beth Gibson
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X five days or less _____ over five days _____ other

THE GOVERNMENT

X will seek detention in this case _____ will **not** seek detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**
OCDETF CASE: _____ Yes _____ X _____ No

DEFENDANT: FRANK ROBERT KING

YOB: 1977

ADDRESS (CITY/STATE): Adams County, CO

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:** 18 U.S.C. § 371 Conspiracy
COUNT FOUR: 18 U.S.C. § 1708 Theft of Mail Matter
COUNT SIX: 18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm
COUNT EIGHT: 21 U.S.C. § 844(a) Possession of a Controlled Substance

LOCATION OF OFFENSE (COUNTY/STATE): Adams County, Colorado

PENALTY: **COUNT ONE:** NMT 5 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT FOUR: NMT 5 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT SIX: NMT 10 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT EIGHT: NMT 1 years imprisonment, NMT \$100,000 fine, \$25assessment, NMT 3 years supervised release.

AGENT: Special Agent Rachel Sileski
United States Postal Inspection Service

AUTHORIZED BY: Beth Gibson
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X five days or less _____ over five days _____ other

THE GOVERNMENT

X will seek detention in this case will **not** seek detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: Yes X No

DEFENDANT: ALEXANDER SAUL KING

YOB: 1994

ADDRESS (CITY/STATE): Adams County, CO

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:** 18 U.S.C. § 371 Conspiracy
COUNT TWO: 18 U.S.C. § 1028A Aggravated Identity Theft
COUNT FIVE: 18 U.S.C. § 1704 Possession of Counterfeit Postal Key
COUNT SEVEN: 18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm
COUNT NINE: 21 U.S.C. § 844(a) Possession of a Controlled Substance

LOCATION OF OFFENSE (COUNTY/STATE): Adams County, Colorado

PENALTY: **COUNT ONE:** NMT 5 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT TWO: NMT 5 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT FIVE: NMT 10 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT SEVEN: NMT 10 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

COUNT NINE: NMT 1 years imprisonment, NMT \$100,000 fine, \$25 assessment, NMT 3 years supervised release.

AGENT: Special Agent Rachel Sileski
United States Postal Inspection Service

AUTHORIZED BY: Beth Gibson
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X five days or less _____ over five days _____ other

THE GOVERNMENT

X will seek detention in this case _____ will **not** seek detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: _____ Yes X No

DEFENDANT: MANUEL MAX VELASQUEZ

YOB: 1992

ADDRESS (CITY/STATE): Adams County, CO

COMPLAINT FILED? _____ YES _____ X _____ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES _____ X _____ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:** 18 U.S.C. § 371 Conspiracy

LOCATION OF OFFENSE (COUNTY/STATE): Adams County, Colorado

PENALTY: **COUNT ONE:** NMT 5 years imprisonment, NMT \$250,000 fine, \$100 assessment, NMT 3 years supervised release.

AGENT: Special Agent Rachel Sileski
United States Postal Inspection Service

AUTHORIZED BY: Beth Gibson
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X five days or less _____ over five days _____ other

THE GOVERNMENT

X will seek detention in this case _____ will **not** seek detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: _____ Yes _____ X _____ No