

UNITED STATES DISTRICT COURT
for the
District of New Hampshire

United States of America
v.

Baraka Janvier

Case No.

24-mj- 83-01-TSM

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of April 16, 2024 in the county of Hillsborough in the
District of New Hampshire, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2114(a)

Robbery of Property of the United States

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

/s/ Stephen Riggins

Complainant's signature

Stephen Riggins, US Postal Inspector

Printed name and title

Attested to by the applicant in accordance with
Fed. R. Crim. P. 4.1 by telephonic conference.

Sworn to before me and signed in my presence.

Date: 04/22/2024

Judge's signature and seal

Judge's signature

City and state: Concord, New Hampshire

Hon. Talesha Saint-Marc, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT**

I, Stephen Riggins, United States Postal Inspector, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I make this affidavit in support of a Criminal Complaint charging Baraka Janvier (“JANVIER”) with the offense Robbery of any person having lawful charge, control, or custody of any mail matter or of any money or other property of the United States, in violation of Title 18, United States Code, Section 2114(a).
2. The information set forth in this affidavit is based on an investigation other law enforcement agents and I are conducting. This affidavit does not contain every fact known to me with respect to this investigation. Rather, it contains those facts I believe to be necessary to establish probable cause for issuance of this complaint and arrest warrant.

II. GENERAL BACKGROUND CONCERNING THE UNITED STATES MAIL AND POSTAL SERVICE KEYS

3. Postal customers use blue collection boxes to send various types of U.S. Mail. First class mail is the most common type of mail sent by stamp and envelope. Some of the most common items sent in first-class mail by postal customers are checks. These checks are often placed into a U.S. Postal Service (“USPS”) blue collection box on the street or in front of a post office. As a result, criminals routinely target USPS first-class mail placed in blue collection boxes to steal checks.
4. One method used to steal mail containing checks from blue collection boxes is to acquire and use Arrow keys to open the blue collection box. These Arrow keys are

the property of USPS and it is a federal offense (18 U.S.C. § 1704) for an unauthorized person to possess one.

III. INVESTIGATION TO DATE

5. On April 16, 2024, at approximately 2:39 PM, the Nashua, NH Police Department (“NPD”) responded to Blacksmith Way, Nashua, NH 03060 for the report of an armed robbery. Information was provided that a USPS letter carrier was held at gunpoint for his Arrow key. NPD spoke with the carrier, who stated he was robbed after delivering mail at a residence on Blacksmith Way. The carrier described that as he was walking back to his USPS van, a dark-skinned male wearing a black-colored balaclava and a gray sweatshirt was standing near the USPS van. The carrier stated that the male pointed a black firearm at his chest and demanded his “keys to the city.” The carrier provided his keys to the male, which included an Arrow key. NPD was later able to obtain video surveillance from a residence, which was consistent with the carrier’s account of the incident. This video surveillance also depicted a second involved male, dressed in all black, who was behind the USPS van and potentially out of view from the carrier. A screen capture of the video is incorporated herein:



6. Inspectors and NPD conducted a canvass of the area of the incident. During the canvass, USPIS and NPD made contact with a local resident, who stated that he saw information about this incident on social media and believed he had pictures of the suspects and their vehicle. The resident stated that he saw the vehicle driving very slowly through the neighborhood and that the occupants' clothing was abnormal for the weather, given that it was a warm day and both had their hoods up over their heads. Two male occupants also entered and exited the suspect vehicle on several occasions for no apparent purpose. After noting the behavior, the resident entered his own vehicle, followed the suspects, and photographed them and the suspect vehicle.
7. The resident provided the pictures and video to law enforcement. Some of those images are incorporated herein:





The photographs the resident provided were consistent with the two suspects seen on the video of the robbery. Through these pictures, law enforcement was able to identify the suspect vehicle as a gray-colored Ford Flex bearing Massachusetts registration 9572XC.

8. A query of Massachusetts registration 9572XC revealed the vehicle to be registered to W.C. at a specific address in Lowell, Massachusetts. NPD and Postal Inspectors proceeded to this address along with the Lowell, MA Police Department (“LPD”) in an attempt to make contact with this vehicle and its occupants. Upon doing so, law enforcement observed the Ford Flex traveling along Douglas Road in Lowell and were able to conduct a traffic stop on the vehicle on Glenellyn Street in Lowell. The driver of the vehicle was a juvenile male (“T.C.”). Law enforcement contacted T.C.’s parents (one of whom was W.C., the registered owner of the vehicle), who responded to the scene of the traffic stop on Glenellyn St. The parents provided consent for law

enforcement to transport T.C. to LPD for an interview. The Ford Flex was towed back to NPD pending a search warrant.

9. Investigators reviewed a *Benoit* form (New Hampshire juvenile advice of rights form) with T.C. and his parents. T.C. waived his rights as listed on the *Benoit* form and agreed to speak with investigators. During the ensuing interview, T.C. stated he had been asked by his friend from the Lowell Vocational School, whom T.C. identified as “Camilo,” to drive Camilo and another male he called “B.K.” to Nashua to retrieve some items from a person unknown to T.C. T.C. stated he picked up Camilo and B.K. at a specified address in Lowell and drove them to Nashua, NH, in the area of Blacksmith Way. T.C. stated Camilo, who was dressed in all black, and B.K., who was dressed in a gray hoodie and black mask, had been discussing getting a key from a mailman and displayed what T.C. described as a black pistol BB gun. T.C. stated that Camilo and B.K. left the car and then came running back, entered T.C.’s vehicle, and T.C. drove away from the area.
10. T.C. provided consent to search his cell phone. While reviewing the phone, T.C. determined he was sharing live location with Camilo. The live location showed that Camilo was located at a specific address in Lowell, which was believed to be, and later confirmed as, B.K.’s residence. T.C. believed that Camilo and B.K. were planning on selling the Arrow key.
11. Based upon images obtained from social media profiles provided by T.C. and through internal LPD databases, B.K. was identified as JANVIER. LPD was also able to identify “Camilo” as a juvenile male (“C.V.”), from Dracut, MA.
12. Law enforcement went to JANVIER’s address in Lowell in an attempt to make contact with JANVIER and C.V. As law enforcement attempted contact at the

residence, several officers proceeded to the front of the residence and other officers proceeded to the side and rear of the residence. As law enforcement knocked and announced their presence at the front door, law enforcement in the rear of the residence heard doors and drawers being opened and closed hurriedly. Seconds after the noises, C.V. and JANVIER exited the rear of the building in a hurried state. Law enforcement detained C.V. and JANVIER at the rear outdoor stairs.

13. During the contact, investigators obtained consent to search the residence and a silver Nissan Rogue for the Arrow key and other evidentiary items. During this search, two black pistol BB guns were located concealed in the dryer, at the rear of the residence. A dark colored mask, consistent with the one worn by JANVIER during the robbery, was also located in the front seat of the Nissan.

14. After being read his *Miranda* rights and waiving them, JANVIER stated that he and C.V. were driven to Nashua, NH earlier in the day and robbed a mail carrier for a key. JANVIER stated he and C.V. met a male subject C.V. knew, in Lowell, and gave him the key but did not get paid. JANVIER later stated that they were paid \$500.

IV. CONCLUSION

15. Based on the facts described above, there is probable cause to believe that Baraka JANVIER committed the offense of Robbery of any person having lawful charge, control, or custody of any mail matter or of any money or other property of the

United States in violation of Title 18 U.S.C. § 2114(a). Accordingly, I request a criminal complaint and arrest warrant be issued for JANVIER.

/s/ Stephen Riggins
STEPHEN RIGGINS
UNITED STATES POSTAL INSPECTOR

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.

Date: **Apr 22, 2024**
Time: **4:00 PM**




HON. TALESHA SAINT-MARC
UNITED STATES MAGISTRATE JUDGE