


COPY

Approved: 
BENJAMIN ALLEE / WON S. SHIN
Assistant United States Attorneys

Before: THE HONORABLE LISA MARGARET SMITH
United States Magistrate Judge
Southern District of New York

-----X
UNITED STATES OF AMERICA : SEALED COMPLAINT
:
-v.- : Violations of 18 U.S.C.
: §§ 371, 659, 2314, 2315,
ANTON SALJANIN, : and 2
a/k/a "Tony," :
GJON SALJANIN, : COUNTY OF OFFENSE:
UJKA VULAJ, : WESTCHESTER
a/k/a "Tito," and :
CARLOS CACERES, :
:
Defendants. :
-----X

SOUTHERN DISTRICT OF NEW YORK, ss.:

JON JENNINGS, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

1. From at least in or about January 2014, up to and including at least in or about April 2014, in the Southern District of New York and elsewhere, ANTON SALJANIN, a/k/a "Tony," GJON SALJANIN, UJKA VULAJ, a/k/a "Tito," and CARLOS CACERES, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, theft from an interstate shipment, interstate transportation of stolen property, and receipt, possession, and sale of stolen property, in violation of Title 18, United States Code, Sections 659, 2314, and 2315.

Objects of the Conspiracy

2. It was a part and an object of the conspiracy that ANTON SALJANIN, a/k/a "Tony," GJON SALJANIN, and UJKA VULAJ, a/k/a "Tito," the defendants, and others known and unknown, would and did embezzle, steal, and unlawfully take,

carry away, and conceal, and by fraud and deception obtain from a motortruck, trailer, and other vehicle, with intent to convert to their own use goods and chattels moving as and which are part of and which constitute an interstate and foreign shipment of freight, express, and other property.

3. It was further a part and an object of the conspiracy that ANTON SALJANIN, a/k/a "Tony," GJON SALJANIN, and UJKA VULAJ, a/k/a "Tito," the defendants, and others known and unknown, would and did transport, transmit, and transfer in interstate and foreign commerce goods, wares, and merchandise of the value of \$5,000 and more, knowing the same to have been stolen, converted and taken by fraud.

4. It was further a part and an object of the conspiracy that UJKA VULAJ, a/k/a "Tito," and CARLOS CACERES, the defendants, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of goods, wares, and merchandise of the value of \$5,000 and more, which have crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken.

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, ANTON SALJANIN, a/k/a "Tony," GJON SALJANIN, UJKA VULAJ, a/k/a "Tito," and CARLOS CACERES, the defendants, together and with others known and unknown, committed the following overt acts, in the Southern District of New York and elsewhere:

a. On or about January 15, 2014, ANTON SALJANIN and GJON SALJANIN drove a rented box truck from Yorktown Heights, New York, to Massachusetts to pick up a shipment of approximately 1,195 Apple MacBook Air laptop computers. The shipment was being sent from a technology company located in Massachusetts to a public school district located in New Jersey.

b. On or about the same date, ANTON SALJANIN and an employee of the technology company loaded approximately 8 pallets of computers into the truck.

c. On or about the same date, ANTON SALJANIN and GJON SALJANIN drove the truck carrying the computers from Massachusetts to Yorktown Heights, toward VULAJ's residence. Approximately 30 minutes later, ANTON SALJANIN and GJON SALJANIN drove the truck to a parking lot in Yorktown Heights, and soon thereafter drove the truck away from the parking lot.

d. On or about January 16, 2014, ANTON SALJANIN reported to the Yorktown Police Department that the truck was missing from the Yorktown Heights parking lot.

e. On or about the same date, ANTON SALJANIN reported to the Yorktown Police Department that he found the truck in a parking lot in Danbury, Connecticut.

f. On or about the same date, ANTON SALJANIN told the Yorktown Police Department and the Connecticut State Police that he found the truck after driving around various areas outside of Yorktown Heights looking for the truck.

g. In or about January 2014, ANTON SALJANIN and GJON SALJANIN told the Yorktown Police Department that they drove from Massachusetts to a convenience store in Somers, New York, and then directly to the parking lot in Yorktown Heights, where they parked the truck overnight. They did not mention driving the truck toward VULAJ's residence prior to driving to the parking lot, or driving the truck away from the parking lot later that night.

h. From in or about January 2014, up to and including in or about April 2014, VULAJ and CACERES sold and otherwise distributed computers that were part of the stolen shipment of approximately 1,195 Apple computers.

(Title 18, United States Code, Section 371.)

COUNT TWO

6. On or about January 15, 2014, in the Southern District of New York and elsewhere, ANTON SALJANIN, a/k/a "Tony," GJON SALJANIN, and UJKA VULAJ, a/k/a "Tito," the defendants, embezzled, stole, and unlawfully took, carried away, and concealed, and by fraud and deception obtained from a motortruck, trailer, and other vehicle, with intent to convert to their own use goods and chattels moving as and which are part of and which constitute an interstate and foreign shipment of freight, express, and other property, of the value of \$1,000 and more, and did aid and abet the same, to wit, ANTON SALJANIN, GJON SALJANIN, and VULAJ stole, and aided and abetted the stealing of, a shipment of approximately 1,195 Apple computers, with a value in excess of \$1 million, which were being shipped by box truck from Massachusetts to New Jersey.

(Title 18, United States Code, Sections 659 and 2.)

COUNT THREE

7. On or about January 15, 2014, in the Southern District of New York and elsewhere, ANTON SALJANIN, a/k/a "Tony," GJON SALJANIN, and UJKA VULAJ, a/k/a "Tito," the defendants, transported, transmitted, and transferred in interstate and foreign commerce goods, wares, and merchandise of the value of \$5,000 and more, knowing the same to have been stolen, converted and taken by fraud, and did aid and abet the same, to wit, ANTON SALJANIN, GJON SALJANIN, and VULAJ transported, and aided and abetted the transportation of, approximately 1,195 stolen Apple computers, with a value in excess of \$1 million, by box truck from Massachusetts to New York.

(Title 18, United States Code, Sections 2314 and 2.)

COUNT FOUR

8. From at least in or about January 2014, up to and including at least in or about April 2014, in the Southern District of New York and elsewhere, UJKA VULAJ, a/k/a "Tito," and CARLOS CACERES, the defendants, received, possessed, concealed, stored, bartered, sold, and disposed of goods, wares, and merchandise of the value of \$5,000 and more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, and did aid and abet the same, to wit, VULAJ and CACERES received, possessed, and sold, and aided and abetted the receipt, possession, and sale of, at least dozens of Apple computers that were part of a stolen shipment of approximately 1,195 Apple computers that had been transported from Massachusetts to New York.

(Title 18, United States Code, Sections 2315 and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

9. I have been personally involved in the investigation of this matter, and I base this affidavit on my personal participation in the investigation, as well as on my conversations with other law enforcement agents and other individuals and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offenses cited above, it does not include all the facts that I have learned during the course of the investigation. Where the contents of documents and the actions, statements, and conversations of

others are reported herein, they are reported in substance and in part, except where otherwise indicated.

I. The Defendants

10. Based on information obtained during the investigation, as described below, I have learned that ANTON SALJANIN, a/k/a "Tony," the defendant, during all relevant times, lived in Yorktown Heights, New York, and worked as, among other things, a truck driver; GJON SALJANIN, the defendant, during all relevant times, was ANTON SALJANIN's brother, and lived in the same residence with ANTON SALJANIN; UJKA VULAJ, a/k/a "Tito," the defendant, was a long-time friend of ANTON SALJANIN, and lived in Yorktown Heights; and CARLOS CACERES, the defendant, was a co-worker of VULAJ.

II. ANTON SALJANIN, a/k/a "Tony," the Defendant, Reports His Truck Stolen

11. I have spoken to officers of the Yorktown Police Department ("Yorktown PD"). Based on those conversations and my review of reports of the Yorktown PD, I have learned that on or about January 16, 2014, in the morning, ANTON SALJANIN, a/k/a "Tony," the defendant, reported to the Yorktown PD that his truck had been stolen. ANTON SALJANIN said, in substance and in part, the following:

a. On or about the previous day, January 15, 2014, he had transported a shipment of 1,195 Apple MacBook laptops from Massachusetts to Yorktown. He had done so in a 2013 Freightliner box truck, i.e., a yellow Penske truck (the "Penske Truck"), a truck which he had previously leased for the purpose of making such deliveries.

b. At approximately 10:00 p.m., he parked the Penske Truck in its normal spot in a parking lot in Yorktown Heights located at 1700 Front Street (the "Front Street Parking Lot"). He locked the Penske Truck and went home for the night.

c. At approximately 8:00 a.m. the following morning, January 16, 2014, ANTON SALJANIN returned to the Front Street Parking Lot to find his Penske Truck gone.

d. ANTON SALJANIN further described, in substance and in part, that he could not think of anyone who would have stolen the truck, and that he never tells anyone what he has in the truck.

12. Based on my conversations with Yorktown PD officers and my review of Yorktown PD and Connecticut State

Police reports, I have learned that later on or about January 16, 2014, ANTON SALJANIN, a/k/a "Tony," the defendant, reported that he had found the Penske Truck at a commuter parking lot near Exit 1 of Interstate 84 in Danbury, Connecticut (the "Danbury Parking Lot"). ANTON SALJANIN said, in substance and in part, that after reporting to Yorktown PD that morning that the Penske Truck had been stolen, he began to drive around to look for the Penske Truck. In the afternoon, he happened to see the truck in the Danbury Parking Lot (more than twenty miles away from where, according to ANTON SALJANIN, the Penske Truck had been stolen) when driving by on Interstate 84.

13. Based on my conversations with another FBI special agent ("Special Agent-1") and members of the Yorktown PD and my review of Yorktown PD records, I have learned, in substance and in part, the following:

a. On or about the morning of January 16, 2014, a Yorktown PD detective ("Detective-1") examined the ground in the area of the Front Street Parking Lot where the Penske Truck had been parked and did not find any broken glass on the ground.

b. In the afternoon that same day, another Yorktown PD detective ("Detective-2") examined the Penske Truck at the Danbury Parking Lot, after ANTON SALJANIN had reported the truck found there. The reported freight--the approximately 1,195 Apple computers--was gone. Detective-2 observed that a window on the passenger side was broken and that there was broken glass in the interior of the truck, on the external passenger-side mirror, on the passenger-side step outside the door, and on the ground outside of the truck next to the window. Based on his training and experience, Detective-2 believes that the glass window was broken at the Danbury Parking Lot, rather than at the Front Street Parking Lot.

c. Detective-1 and Detective 2 believe that the Penske Truck would not have been visible in the Danbury Parking Lot to a driver passing by on Interstate 84.

14. Based on my review of written statements made by ANTON SALJANIN, a/k/a "Tony," to the Connecticut State Police and the Yorktown PD in or about January 2014, I have further learned that ANTON SALJANIN described, in substance and in part, the following additional details in connection with his claim that his Penske Truck had been stolen:

a. In or about December 2013, ANTON SALJANIN rented the Penske Truck for use in his work delivering cargo for a shipping company ("Shipping Company-1").

47

b. On or about January 15, 2014, ANTON SALJANIN and his brother, GJON SALJANIN, the defendant, drove the Penske Truck to a company in Massachusetts ("Technology Company-1") to pick up the shipment of Apple MacBook Air laptop computers. The shipment was to be delivered to two public high schools in New Jersey.

c. On the way from Technology Company-1 to New York, ANTON SALJANIN and GJON SALJANIN stopped at a 7-Eleven convenience store in Somers, New York.

d. ANTON SALJANIN and GJON SALJANIN then drove directly to the Front Street Parking Lot, where they parked the truck at approximately 10:00 to 10:30 p.m.

e. From the Front Street Parking Lot, ANTON SALJANIN and GJON SALJANIN then drove a grey or silver BMW to their residence in Yorktown Heights, New York.

f. The following morning, after he had found his Penske Truck gone and reported as much to the police, ANTON SALJANIN drove around to look for his truck. His reports regarding where he drove varied:

i. To the Connecticut State Police, ANTON SALJANIN claimed that he drove south on Interstate 684 to Exit 4, and north on Interstate 684 to Exit 8, before returning home around 11:00 or 11:30 a.m. Around 2:30 p.m., he resumed driving around to look for the Penske Truck. He took Interstate 684 northbound to Interstate 84 into Connecticut and, at approximately 3:30 p.m., spotted the Penske Truck near Exit 1 in Danbury, Connecticut.

ii. To Detective-1, ANTON SALJANIN stated that he drove down an unspecified highway to 233rd Street in the Bronx, then drove up and down Interstate 684, and then drove on Interstate 84 when he noticed a large yellow truck from the highway.

15. Based on my discussions with officers of the Yorktown PD and my review of Yorktown PD records, I have learned that on or about January 17, 2014, GJON SALJANIN, the defendant, gave a statement to the Yorktown PD. GJON SALJANIN said, in substance and in part, the following:

a. On or about January 15, 2014, ANTON SALJANIN, a/k/a "Tony," the defendant, asked GJON SALJANIN to accompany him to Massachusetts to pick up a shipment.

b. On the way back from Massachusetts to New York, ANTON SALJANIN and GJON SALJANIN stopped at a 7-Eleven convenience store on Route 100.

c. ANTON SALJANIN and GJON SALJANIN then drove to a parking lot in Yorktown at approximately 10:30 p.m.

d. From the parking lot, ANTON SALJANIN and GJON SALJANIN then drove a grey BMW to their residence.

e. On or about January 16, 2014, at approximately 11:00, ANTON SALJANIN told GJON SALJANIN about the missing truck.

III. Investigation of the Theft of the Interstate Shipment of Nearly 1,200 Apple Computers

16. Special Agent-1 and I have conducted an investigation of the theft of the interstate shipment of the approximately 1,195 Apple Computers. As set forth below, during the investigation we have found, among other things, the following evidence of the defendants' participation in the charged offenses.

A. The Stolen Shipment of the Apple Computers from Massachusetts to Public Schools in New Jersey

17. I have spoken with a representative of a shipping company based in New York ("Witness-1" and "Shipping Company-1"). Based on that conversation, I have learned, in substance and in part, the following:

a. ANTON SALJANIN, a/k/a "Tony," the defendant, has driven for Shipping Company-1 as an independent contractor for several years. Prior to January 2014, ANTON SALJANIN had successfully delivered numerous shipments for one of Shipping Company-1's clients, Technology Company-1.

b. On or about January 7, 2014, or January 8, 2014, Witness-1 informed ANTON SALJANIN that he would be delivering two shipments of Apple computers from Technology Company-1 to New Jersey, and that the first shipment was to be picked up on January 9, 2014.

c. On or about January 14, 2015, Witness-1 informed ANTON SALJANIN that the second shipment of Apple Computers from Technology Company-1 to New Jersey was to be picked up the next day.

18. Special Agent-1 and I have spoken with a representative of Technology Company-1. Based on that

conversation, I have learned, in substance and in part, the following:

a. Among the services that Technology Company-1 provides is loading specified software requested by a customer onto Apple computer products and then shipping the products to the customer.

b. In or about January 2014, Technology Company-1 had two shipments of Apple MacBook Air laptop computers scheduled to be shipped to a customer: a public school district in New Jersey. The first shipment of approximately 1,300 Apple MacBook Air laptop computers was scheduled to be delivered on or about January 10, 2014. The second shipment of approximately 1,195 Apple MacBook Air laptop computers was scheduled to be delivered on or about January 16, 2014.

c. One of the carriers that Technology Company-1 frequently used for shipments on the east coast of the United States was Shipping Company-1. Technology Company-1 arranged for Shipping Company-1 to deliver the two shipments to the New Jersey School District, and ANTON SALJANIN, a/k/a "Tony," the defendant, was assigned to handle the shipments.

d. On or about January 9, 2014, ANTON SALJANIN arrived at Technology Company-1 to pick up the first shipment for the New Jersey School District. While he was loading the truck, ANTON SALJANIN was given forms describing the contents of the first shipment, i.e., 1,300 Apple MacBook Air laptop computers, that he was expected to have signed by a representative of the recipient.

e. On or about January 15, 2014, ANTON SALJANIN arrived at Technology Company-1 to pick up the second shipment for the New Jersey School District. At that time, ANTON SALJANIN produced to Technology Company-1 signed forms documenting the successful delivery of the first shipment of 1,300 Apple MacBook Air laptop computers. ANTON SALJANIN was given a new set of forms describing the contents of the second shipment, i.e., 1,195 Apple MacBook Air laptop computers, that he was expected to have signed by a representative of the recipient. The total value of the shipment was in excess of \$1 million.

B. ANTON SALJANIN's and GJON SALJANIN's Reports to the Police Are Belied by Video Surveillance Recordings

19. Based on my conversations with members of the Yorktown PD who have reviewed security camera footage and

photographs from various locations described below, as well as my review of such footage and photographs, and my review of maps and discussions with those familiar with the Yorktown area, I have learned of video surveillance depicting the following on or about January 15, 2014. Based on the video surveillance recordings and other evidence I have obtained during the investigation, I have learned that a truck matching the description of the Penske Truck was captured on several video surveillance cameras between the hours of approximately 9:30 p.m. and 11:30 p.m. on or about January 15, 2014, in and around Yorktown Heights, New York. I have further learned the following:

a. The truck matching the description of the Penske Truck made a detour from the route claimed by ANTON SALJANIN and GJON SALJANIN to law enforcement officers, as follows:

i. Security camera footage from a 7-Eleven convenience store located on Route 100 in Somers, New York, depicts two individuals who appear to be ANTON SALJANIN, a/k/a "Tony," and GJON SALJANIN, the defendants, enter and then exit the store. According to the security camera's time stamps, ANTON SALJANIN and GJON SALJANIN entered the store at approximately 9:35 p.m. and exited the store at approximately 9:38 p.m.

ii. At approximately 9:45 p.m., according to time stamps from video surveillance cameras, the truck matching the description of the Penske Truck was captured on a video surveillance camera traveling from the direction of the 7-Eleven in Somers, New York, toward the direction of the Front Street Parking Lot in Yorktown, as ANTON SALJANIN and GJON SALJANIN had described upon reporting the truck stolen.

iii. Video surveillance footage shows, however, that the truck matching the description of the Penske Truck departed the route from the 7-Eleven to the Front Street Parking Lot, instead making a turn in a different direction onto Crompond Road in Yorktown.

iv. Video surveillance footage further shows that the truck matching the description of the Penske Truck returned to the route from the 7-Eleven to the Front Street Parking Lot approximately twenty-nine minutes after it had departed from that route. Other video surveillance footage shows a truck matching the description of the Penske Truck arriving in the area of the Front Street Parking Lot.

b. When it departed the route described by ANTON SALJANIN and GJON SALJANIN, the truck matching the description of the Penske Truck is captured on video surveillance recordings traveling in the direction of, among other places, the residence of UJKA VULAJ, the defendant. One video surveillance recording shows the truck matching the description of the Penske Truck within approximately 1/8 of a mile of VULAJ's residence.¹

c. The duration of the detour, approximately 29 minutes, described above, of the truck matching the description of the Penske Truck from the route claimed by ANTON SALJANIN and GJON SALJANIN, corresponds to the approximate length of time it would take to drive to VULAJ's residence, unload the computers, and return to the route to the Front Street Parking Lot.

d. Video surveillance footage in the vicinity of the Front Street Parking Lot captured a truck matching the description of the Penske Truck arriving in the vicinity of the Front Street Parking lot, then later leaving the vicinity of the Front Street Parking Lot at approximately 11:34 p.m., according to the time stamp on the footage. The video surveillance footage shows, shortly before the truck matching the description of the Penske Truck leaves the area, a black SUV arrives in the vicinity of the Front Street Parking Lot, then approximately one minute elapses, then the black SUV leaves, followed by the truck matching the description of the Penske Truck.

e. Based on my review of law enforcement records, I have learned that GJON SALJANIN, the defendant, is the registered owner of a black 2004 Chevrolet Trailblazer SUV.

C. ANTON SALJANIN's Reports to the Police Are Belied by Phone Records

20. During the investigation, Special Agent-1 has reviewed toll records and historical cell site location data for a phone number of ANTON SALJANIN, a/k/a "Tony," the defendant (the "Anton Saljanin Phone"). Based on my conversations with Special Agent-1, I have learned that the historical cell site location data for the Anton Saljanin Phone shows that on January 16, 2014, the Anton Saljanin Phone did not travel to the locations south on Interstate 684 to Exit 4, or south to 233rd

¹ ANTON SALJANIN, a/k/a "Tony," and GJON SALJANIN, the defendants, resided near VULAJ, and the truck matching the description of the Penske Truck was therefore also captured heading in the direction of their residence.

Street in the Bronx, where ANTON SALJANIN claimed to have gone to look for the Penske Truck.

D. Phone Records Show Contact Between ANTON SALJANIN and GJON SALJANIN and UJKA VULAJ on the Day of the Heist

21. The Yorktown PD obtained phone numbers of ANTON SALJANIN, a/k/a "Tony," GJON SALJANIN, and UJKA VULAJ, a/k/a "Tito," the defendants, from interviews of ANTON SALJANIN and GJON SALJANIN. Based on my review of toll records of these phone numbers, I have learned, in substance and in part, that on or about January 15, 2014:

a. Approximately 10 calls were placed between ANTON SALJANIN and VULAJ, between approximately 8:21 a.m. and approximately 3:27 p.m.

b. Approximately 3 calls were placed between GJON SALJANIN and VULAJ, between approximately 4:15 p.m. and approximately 9:15 p.m.

E. UJKA VULAJ, a/k/a "Tito," and CARLOS CACERES, the Defendants, Sold Stolen Computers

22. The FBI has obtained from Apple Inc. a list of Apple MacBook Air laptop computers from the January 15, 2014, stolen shipment that were subsequently registered online by end users (the "Stolen Computers").

23. Special Agent-1 has spoken to a representative of Apple Inc. and reviewed the retail prices of Apple MacBook Air laptop computers on the Apple Store website. Based on my conversations with Special Agent-1, I have learned, in substance and in part, the following:

a. In or about 2014, a new model of one of the Stolen Computers had a retail price of approximately \$1,000.

b. The Apple Store sells refurbished computers that are marked down approximately ten to fifteen percent from the retail price of a new computer.

Sales by UJKA VULAJ, a/k/a "Tito"

24. Special Agent-1, another FBI Special Agent ("Special Agent-2"), and I have spoken with two individuals ("Individual-1" and "Individual-2") who purchased approximately 2 of the Stolen Computers. Based on those conversations, and my

conversations with Special Agent-1 and Special Agent-2, I have learned, in substance and in part, the following:

a. Individual-1 and Individual-2 live in an apartment at an address on Yates Avenue in the Bronx. According to Individual-1, their landlord is a person named "Tito," and Individual-2 and "Tito" are friends who have known each other for over twenty years.

b. Individual-2 stated that Individual-2 purchased two Apple computers for \$650.00 each, one of which Individual-2 kept and the other of which Individual-2 sold to Individual-2's employer.

c. Individual-2 denied purchasing the computers from their landlord "Tito."

25. Based on my review of public records and records provided by Apple Inc., I have learned, in substance and in part, the following:

a. UJKA VULAJ, a/k/a "Tito," the defendant, owns the property where Individual-1 and Individual-2 reside.

b. The first of the Stolen Computers to be registered online was registered online on or about January 18, 2014, by a person whose name matches the name of Individual-2's employer.

c. The second of the Stolen Computers to be registered online was registered online in or about the end of January 2014, by Individual-1.

26. Special Agent-1 and Special Agent-2 have spoken with an individual ("Individual-3") who purchased approximately 8 of the Stolen Computers. Based on my conversations with Special Agent-1 and Special Agent-2, I have learned, in substance and in part, the following:

a. Beginning in or about February or March 2014, Individual-3 purchased a total of approximately 8 Apple computers from the nephew of UJKA VULAJ, a/k/a "Tito," the defendant, in multiple transactions.

b. Individual-3 paid \$550.00 in cash for each computer.

c. Each computer was packaged in a brown box.

d. After the second computer purchase from VULAJ's nephew, Individual-3 asked VULAJ's nephew where the

computers were from. VULAJ's nephew responded that the computers were stolen.

27. The Yorktown PD obtained a phone number of UJKA VULAJ, a/k/a "Tito," the defendant, from ANTON SALJANIN, a/k/a "Tony," the defendant. The FBI obtained a phone number of VULAJ's nephew, from Individual-3. Based on my review of toll records of these phones, I have learned, in substance and in part, that from on or about January 15, 2014, to on or about January 31, 2014, VULAJ and VULAJ's nephew placed approximately 17 calls to each other.

28. Special Agent-2 and two other FBI Special Agents ("Special Agent-3" and "Special Agent-4") have spoken with two individuals ("Individual-4" and "Individual-5") who purchased approximately 6 of the Stolen Computers. Based on my conversations with Special Agent-2, Special Agent-3, and Special Agent-4, I have learned, in substance and in part, the following:

a. Individual-4 knows an individual by the name "Tito," and identified "Tito" from a photograph as UJKA VULAJ, a/k/a "Tito," the defendant.

b. In or about February or March 2014, "Tito" approached Individual-4 about purchasing an Apple computer and said that he had about 20 computers available for \$500.00 each. Individual-4 purchased an Apple computer for \$500.00 in cash. Individual-4 subsequently purchased 5 more Apple computers, each for \$500.00 in cash.

c. Individual-5 is Individual-4's spouse. According to Individual-5, each of the Apple computers purchased by Individual-4 was packaged in a sealed cardboard box with no identifying marks.

Sales by CARLOS CACERES

29. Based on a conversation with a representative of a janitorial services company, I have learned that UJKA VULAJ, a/k/a "Tito," and CARLOS CACERES, the defendants, have both worked as janitorial and maintenance workers at an address in Manhattan.

30. Special Agent-1 and I have spoken with an individual ("Individual-6") who purchased approximately 2 of the Stolen Computers. Special Agent-1, Special Agent-2, and I have spoken with an individual ("Individual-7") who purchased approximately 5 of the Stolen Computers. Based on those conversations, and my conversations with Special Agent-1 and

Special Agent-2, I have learned, in substance and in part, the following:

- a. In or about January or February 2014, Individual-6 purchased approximately 2 Apple computers from Individual-6's cousin, CARLOS CACERES, the defendant. Individual-6 paid \$600.00 in cash for each computer.
- b. CACERES told Individual-6 that a friend was supplying CACERES with the computers.
- c. According to Individual-6, CACERES has worked as a maintenance worker at an address located on Park Avenue in Manhattan.
- d. In or about February 2014, Individual-7 purchased approximately 5 Apple computers from a person known to Individual-7 to be Individual-6's cousin named "Carlos"; Individual-7 had grown up with Individual-6 and "Carlos." Individual-7 paid \$650.00 in cash for each computer.
- e. "Carlos" told Individual-7 that "Carlos" had obtained the computers from his job.
- f. According to Individual-7, CACERES has worked night shifts as a maintenance worker in a building in lower Manhattan.

31. Special Agent-2 and an FBI Task Force Officer ("Task Force Officer-1") have spoken with an individual ("Individual-8") who purchased approximately 6 of the Stolen Computers. Based on my conversations with Special Agent-2 and Task Force Officer-1, I have learned, in substance and in part, the following:

- a. In or about February 2014, a friend named "Carlos," whom Individual-8 had known for at least 10 years, approached Individual-8 and stated that he had Apple Computers for sale for \$600 each.
- b. Individual-8 purchased approximately 6 Apple computers from "Carlos" in two separate transactions. Individual-8 paid \$600 for each computer.
- c. Each computer was wrapped in plastic, with the charger included, packaged inside a brown box.
- d. "Carlos" told Individual-8 that the computers came from an Apple store in White Plains, New York.

e. Individual-8 is friends with Individual-6. Individual-8 knows that "Carlos" is Individual-6's cousin, and that "Carlos" works as a security guard at a building in Manhattan.

f. Individual-8 identified a photograph of CARLOS CACERES, the defendant, as "Carlos."

32. Special Agent-1, Special Agent-2, and I have spoken with an individual ("Individual-9") who was approached by CARLOS CACERES, the defendant, about selling Apple computers.

a. Individual-9 has known CACERES for many years.

b. In or about 2014, CACERES approached Individual-9 about selling Apple computers and showed Individual-9 an Apple laptop computer.

c. The computer was packaged in a brown box. CACERES offered the computer for \$700 and said that he had obtained the computer from a friend.

d. Individual-9 believed the computer was stolen and declined to purchase the computer.

e. CACERES works overnight shifts at a cleaning company.

33. Special Agent-1 and I have spoken with an individual ("Individual-10") who purchased one of the Stolen Computers. Based on those conversations, I have learned, in substance and in part, the following:

a. In or about March 2014, CACERES approached Individual-10 about selling computers for CACERES. Individual-10 agreed to sell approximately 35 computers on eBay.

b. CACERES delivered about five or six computers at a time to Individual-10 on several occasions; they met outside of Individual-10's apartment building. Each computer was packaged in an unmarked brown box.

c. Individual-10 sold the computers from in or about March 2014 to in or about April 2014. Individual-10 sold each computer for approximately \$700.00 to \$800.00 and remitted the proceeds to CACERES. CACERES paid Individual-10 approximately \$20 to \$50 for each computer sold.

d. CACERES said that he obtained the computers through a friend employed by Apple.

e. Individual-10 knows that CACERES is Individual-6's cousin.

f. CACERES told Individual-10 that he works as a maintenance worker in a building in Manhattan.

34. Special Agent-1 and I have spoken with an individual ("Individual-11") who purchased approximately 2 of the Stolen Computers. Special Agent-1 and I have spoken with Individual-11's brother ("Individual-12"). Based on those conversations, I have learned, in substance and in part, the following:

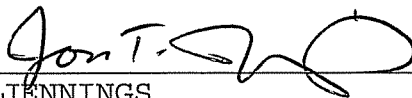
a. According to Individual-11, in or about the winter of 2014, a friend of Individual-11 named "Carlos" informed Individual-11 that he had "brand new, out of the box" computers for sale for \$650.00 each. "Carlos" stated that he was getting the computers from a friend.

b. Individual-11 purchased an Apple computer from "Carlos" for \$650.00 in cash. Individual-11 subsequently purchased a second computer from "Carlos" for \$650.00 in cash. Individual-11 subsequently facilitated the purchase of computers from "Carlos" by Individual-12's girlfriend.

c. According to Individual-11, Individual-12's girlfriend's brother ("Individual-13") expressed to Individual-11 an interest in purchasing computers from "Carlos." In or about February 2014, Individual-11 introduced Individual-13 to "Carlos" outside of "Carlos's" residence in the Bronx. Individual-11 observed "Carlos" give Individual-13 a box of approximately 10 to 15 computers in exchange for a "bundle" of cash.

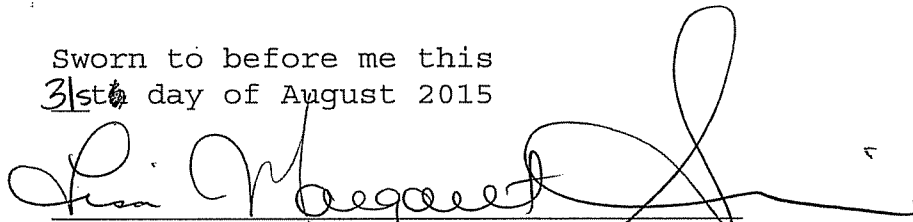
d. According to Individual-12, Individual-13 purchased and re-sold at least 50 computers purchased from "Carlos." Individual-12 identified photographs of CACERES as "Carlos."

WHEREFORE, the deponent respectfully requests that a warrant issue for the arrests of ANTON SALJANIN, a/k/a "Tony," GJON SALJANIN, UJKA VULAJ, a/k/a "Tito," and CARLOS CACERES, the defendants, and that they be arrested and imprisoned, or bailed, as the case may be.



JON JENNINGS
Special Agent
Federal Bureau of Investigation

Sworn to before me this
31st day of August 2015



THE HONORABLE LISA MARGARET SMITH
United States Magistrate Judge
Southern District of New York