


Approved: 
Samuel S. Adelsberg
Assistant United States Attorney

Before: THE HONORABLE SARAH NETBURN
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	:	<u>COMPLAINT</u>
- v. -	:	Violation of
	:	18 U.S.C. § 1709
JOSEFINA SALAS,	:	
	:	COUNTY OF OFFENSE:
Defendant.	:	NEW YORK

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SOUTHERN DISTRICT OF NEW YORK, ss.:

ANGELA FLORA, being duly sworn, deposes and says that she is a Special Agent with the United States Postal Service ("USPS"), Office of the Inspector General ("USPS-OIG"), and charges as follows:

COUNT ONE
(Theft of Mail by a Postal Employee)

1. From at least in or about December 2016, up to and including on or about December 19, 2017, in the Southern District of New York and elsewhere, JOSEFINA SALAS, the defendant, being a Postal Service employee, knowingly did embezzle letters, packages, bags, and mail, and articles and things contained therein entrusted to her and which came into her possession intended to be conveyed by mail, and carried and delivered by a carrier, messenger, agent, and other person employed in a department of the Postal Service, and forwarded through and delivered from a post office and station thereof established by authority of the Postmaster General or of the Postal Service; and did steal, abstract, and remove from such letters, packages, bags, and mail, articles and things contained therein, to wit, SALAS removed and stole articles contained in letters from a United States Postal Service Processing and

Distribution Center located at 341 Ninth Avenue in New York, New York.

(Title 18, United States Code, Sections 1709.)

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

2. I am a Special Agent with the USPS-OIG and have been so employed for approximately two years. I have been personally involved in the investigation of this matter. This affidavit is based upon my observations and personal participation in the investigation, my conversations with law-enforcement officers and others, and my examination of reports and records prepared by others. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents or the actions, statements, or conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based upon my participation in this investigation, my personal observations, my review of USPS documents, and conversations with other law enforcement officers, I have learned, among other things:

a. JOSEFINA SALAS, the defendant, has been employed by USPS since in or about October 1999. SALAS currently works at the USPS Processing and Distribution Center located at 341 Ninth Avenue in New York, New York (the "Processing and Distribution Center"). This Processing and Distribution Center is responsible for all mail distributed in Manhattan and the Bronx.

b. On or about December 18, 2017, I observed video surveillance of SALAS from October 6, 2017. Specifically, I observed SALAS rifling through the mail, opening mail, and placing several pieces of mail into her bags.

c. On or about December 18, 2017, I also observed video surveillance of SALAS from on or about November 24, 2017. In that footage, I observed SALAS rifling through the mail, opening mail, and placing several pieces of mail on her person. In one case, SALAS removed cash from an envelope and placed it in her pocket.

d. On or about December 18, 2017, I also observed video surveillance of SALAS from on or about December 4, 2017. In that footage, I observed SALAS using a box-cutter to open a black package, rifling through the package, and taking the contents of the package and placing them on her person.

4. From my interview of JOSEFINA SALAS, the defendant, on December 19, 2017, as well as my review of a written statement made by SALAS during the interview, I have learned, among other things, that:

a. After receiving Miranda warnings, SALAS stated in substance and in part that she stole cash, gift cards, jewelry, clothing, a Samsung phone, and other objects from the United States mail for approximately one year. SALAS admitted that she stole from the mail during every one of her shifts during that time period.

b. SALAS stated further in substance and in part that she took from the United States mail the approximately 116 unopened greeting cards, 9 unopened parcels, and the contents of 3 opened parcels in her possession on December 19, 2017. SALAS further stated that she took these items, which were recovered by USPS agents during a search incident to her arrest, for her own benefit and without the authorization of the senders or the intended recipients of the mail.

WHEREFORE, deponent prays that JOSEFINA SALAS, the defendant, be imprisoned or bailed, as the case may be.

ANGELA FLORA
SPECIAL AGENT
UNITED STATES POSTAL SERVICE
OFFICE OF THE INSPECTOR GENERAL

Sworn to before me this
19th day of December, 2017

THE HONORABLE SARAH NETBURN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK