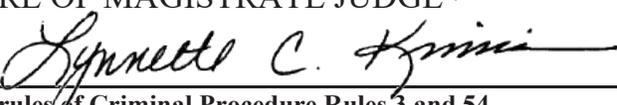


United States District Court		DISTRICT of ARIZONA	
United States of America v. Richard Stefon Ramroop (YOB:1990) Manuel George Madrid (YOB: 1993) (U.S. Citizens)		DOCKET NO.	
		MAGISTRATE'S CASE NO. 26-05623MJ	
Complaint for violation of Title 18 U.S.C. § 371 (Conspiracy to Commit an Offense Against the United States: Theft of Government Funds)			
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: From a time unknown but at least from January 2022 continuing through December 2025 in the District of Arizona, the defendants, Richard Stefon RAMROOP and Manuel George MADRID knowingly and willfully conspired and agreed together and with each other, to commit an offense against the United States, that is, to knowingly and willfully embezzle, steal, purloin, and convert to the defendants' use or the use of another, with the intent to deprive the owner of the use and benefit of the money and property belonging to the United States having a value of more than \$1,000, in violation of Title 18, U.S.C. § 641.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: ***CONTINUED ON PAGES TWO THROUGH TEN***			
MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE: N/A			
DETENTION REQUESTED COMPLAINT REVIEWED by AUSA Vincent J. Sottosanti <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>		SIGNATURE OF COMPLAINANT Christopher T. Wilder <small>Digitally signed by Christopher T. Wilder Date: 2026.01.16 14:42:27 -07'00'</small>	
		OFFICIAL TITLE & NAME: Special Agent, IRS-CI	
Sworn to before me and subscribed via telephonically.			
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 		DATE 1/16/2026	

¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54

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BACKGROUND

1. Richard Stefon RAMROOP is employed by the United States Air Force as a pharmacy technician and, according to Air Force records, Manuel George MADRID was his spouse.
2. RAMROOP served at Davis-Monthan Air Force Base as the Noncommissioned Officer in Charge (NCOIC) of the Satellite Pharmacy, where he supervised two sections. As part of his official duties, RAMROOP is responsible for ordering medical supplies and prescription items for both the medical group and the pharmacy at Davis-Monthan AFB.
3. Records obtained thus far from the US Air Force show that from approximately January 2025, through December 2025 RAMROOP has utilizing the Air Force's Defense Medical Logistics Standard Support (DMLSS) system to place orders for thousands of units of medical devices. Orders placed through DMLSS are paid for by the Department of War.
4. From 2022 through 2025, bank accounts controlled by RAMROOP and MADRID received millions of dollars in wire transfers, Automated Clearing House (ACH) deposits, and other credits from companies engaged in the resale of medical test strips and devices, including OTC Warehouse LLC, Keystone Medical Wholesale Inc., Teststripz LLC, Webuyteststrips, and Morningside Cons.
5. Based on the information provided in this complaint, RAMROOP is ordering medical devices through DMLSS, stealing those devices and RAMROOP and MADRID are then selling those devices. Agents are in the process of obtaining DMLSS records dating back to early 2022 to show RAMROOP's ordering history, however, bank deposits discussed below show that RAMROOP and MADRID have been receiving money for medical devices since January 2022.
6. Between January 2022 and October 2025 MADRID's Navy Federal Credit Union (NFCU) account #7039757468 received approximately \$10,121,373.50 in deposits from medical resale companies.

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7. Between March 24, 2025, and October 17, 2025, RAMROOP's USAA Account #0202032086 received approximately \$1,701,065.00 in deposits from medical resale companies. On October 23, 2025, this USAA account was closed, and a check was issued for the remaining balance of \$448,445.10. On October 31, 2025, RAMROOP deposited this check into his JP Morgan Chase Bank account #907238585.
8. Between July 2025 and October 2025, RAMROOP's USAA Federal Savings Bank account received approximately \$907,085.00 in deposits from medical resale companies.

ACTS IN FURTHERANCE OF THE CONSPIRACY

9. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Arizona.
10. In 2025, RAMROOP placed the following orders for medical devices through the Air Force's DMLSS system:¹

Date	Item	Quantity	Cost
1/24/25	DEXCOM G6 SENSOR 3S	300	\$24,954.00
2/3/25	DEXCOM G6 SENSOR 3S	300	\$24,954.00
3/4/25	DEXCOM G6 SENSOR 3S	300	\$24,954.00
4/7/25	DEXCOM G6 SENSOR 3S	300	\$24,954.00
5/1/25	DEXCOM G6 SENSOR 3S	300	\$24,954.00
6/5/25	DEXCOM G6 SENSOR 3S	300	\$24,954.00
7/16/25	DEXCOM G6 SENSOR 3S	300	\$24,954.00
8/19/25	DEXCOM G6 SENSOR 3S	500	\$41,590.00

¹ These transactions are examples of the orders placed by RAMROOP through DMLSS for medical devices and not a complete list of all the orders placed by RAMROOP.

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9/8/25	DEXCOM G6 SENSOR 3S	300	\$24,954.00
12/5/25	DEXCOM G6 SENSOR 3S	300	\$24,015.00

11. In 2025, RAMROOP's Navy Federal Savings Bank account received the following payments from medical device resellers:

Account	Date	Amount	Description
0202032086	07/08/2025	\$100,000.00	ACH DEP 070825 WEBUYTESTSTRIPS, SENDER ***** 0370
0202032086	08/07/2025	\$46,800.00	WIRE TRANSFER CREDIT 0515679320250807 OTC WAREHOUSE LLC DBA AFFORDABLE
0202032086	09/08/2025	\$42,000.00	ACH DEP 090825 MORNINGSIDE CONS BILL PAY ***** CON
0202032086	10/10/2025	\$31,000.00	ACH DEP 101025 MORNINGSIDE CONS BILL PAY ***** CON

12. From 2022 through 2025, MADRID's Navy Federal Credit Union Everyday Checking account received the following payments from medical device resellers:²

Account	Date	Amount	Description
7039757468	01/10/2022	\$4,224.00	POS Credit Adjustment 4175 Transaction 01-10-22 Zelle*otc Warehou Visa Direct AZ
7039757468	02/10/2022	\$3,950.00	POS Credit Adjustment 4175 Transaction 02-10-22 Zelle*teststripz Visa Direct AZ
7039757468	03/22/2022	\$5,000.00	POS Credit Adjustment 0056 Transaction 03-22-22 Zelle*teststripz Visa Direct AZ
7039757468	04/04/2022	\$3,960.00	POS Credit Adjustment 0056 Transaction 04-04-22 Zelle*teststripz Visa Direct AZ
7039757468	05/13/2022	\$3,487.00	POS Credit Adjustment 0056 Transaction 05-13-22 Zelle*otc Warehou Visa Direct AZ
7039757468	06/02/2022	\$2,644.50	POS Credit Adjustment 0056 Transaction 06-02-22 Zelle*teststripz Visa Direct AZ
7039757468	07/08/2022	\$4,200.00	POS Credit Adjustment 0056 Transaction 07-08-22 Zelle*teststripz Visa Direct AZ

² These transactions are examples of wires received by MADRID from medical device resellers and not a complete list of all the deposits MADRID received from these companies.

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7039757468	08/05/2022	\$12,415.00	Bank Wire Deposit: Keystone Medical Wholesale INC.
7039757468	09/09/2022	\$10,000.00	POS Credit Adjustment 0056 Transaction 09-09-22 Zelle *teststripz, Visa Direct AZ
7039757468	10/04/2022	\$3,500.00	POS Credit Adjustment 0056 Transaction 10-04-22 Zelle*teststripz, Visa Direct AZ
7039757468	11/14/2022	\$5,900.00	POS Credit Adjustment 0056 Transaction 11-11-22 Zelle*teststripz, Visa Direct AZ
7039757468	11/16/2022	\$6,600.00	POS Credit Adjustment 0056 Transaction 11-16-22 Zelle*teststripz, Visa Direct AZ
7039757468	12/01/2022	\$8,000.00	Deposit - ACH Paid From Teststripz, LLC Sender 01Afds
7039757468	12/05/2022	\$8,000.00	Deposit - ACH Paid From Teststripz, LLC Sender 01Afds
7039757468	12/06/2022	\$5,000.00	POS Credit Adjustment 0056 Transaction 12-06-22 Zelle*teststripz, Visa Direct AZ
7039757468	12/08/2022	\$5,000.00	POS Credit Adjustment 0056 Transaction 12-08-22 Zelle*teststripz, Visa Direct AZ
7039757468	04/25/2023	\$3,705.00	Deposit - ACH Paid From Teststripz, LLC Sender 01Afds
7039757468	04/25/2023	\$64,740.00	Bank Wire Deposit: Keystone Medical Wholesale INC.
7039757468	04/28/2023	\$1,900.00	Deposit - ACH Paid From Teststripz, LLC Sender 01Afds
7039757468	08/11/2023	\$11,400.00	Deposit - ACH Paid From Teststripz, LLC Sender 01Afds
7039757468	01/05/2024	\$100,000.00	Bank Wire Deposit: OTC Warehouse
7039757468	04/10/2024	\$217,840.00	Bank Wire Deposit: OTC Warehouse
7039757468	08/12/2024	\$439,600.00	Bank Wire Deposit: OTC Warehouse
7039757468	12/31/2024	\$112,500.00	Bank Wire Deposit: OTC Warehouse
7039757468	02/06/2025	\$421,370.00	Bank Wire Deposit: OTC Warehouse
7039757468	02/20/2025	\$456,795.00	Bank Wire Deposit: OTC Warehouse
7039757468	03/17/2025	\$500,000.00	Bank Wire Deposit: OTC Warehouse

13. On or about December 15, 2025, RAMROOP placed an order in the DMLSS system for 300 Dexcom G6 Sensor S3 units for a total of \$24,015.00.
14. Between December 16 and 18, 2025, physical and video surveillance documented the movement of government property believed to be the Dexcom devices from the warehouse located on Davis-Monthan Air Force Base to locations associated with RAMROOP and MADRID. The following summary outlines the sequence of events observed during this period. I have reviewed surveillance footage and related evidence and learned the following:

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15. On December 16, 2025, multiple boxes were observed stacked on a shipping cart within the logistics warehouse located at 4175 South Alamo Avenue (Building 400), Davis-Monthan Air Force Base, Tucson, Arizona. Several white boxes positioned on the uppermost layer of the cart appeared consistent in size and appearance with packaging used for Dexcom G6 S3 Sensors. A photograph depicting the interior of the logistics warehouse is provided below.



16. On December 16, 2025, at approximately 1:58 p.m., agents observed RAMROOP loading multiple boxes from the Air Force warehouse into the bed of his Ford Raptor pickup truck. After the boxes were loaded, RAMROOP departed the base. An image of RAMROOP loading his truck is below:

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17. At approximately 2:07 p.m., RAMROOP arrived at a Chevron gas station located just outside the base perimeter and met an unidentified male (herein referred to as UIM#1). Video surveillance obtained from the Chevron district manager shows RAMROOP and UIM#1 exchanging vehicles. After the exchange, RAMROOP returned to the base and resumed his duties. A still image from the surveillance footage depicting RAMROOP and UIM#1 swapping vehicles is shown below:



18. At approximately 2:25 p.m., UIM#1 arrived at RAMROOP's residence located at 823 South Arizona Ave. driving RAMROOP's Ford Raptor, which was loaded with boxes. Video

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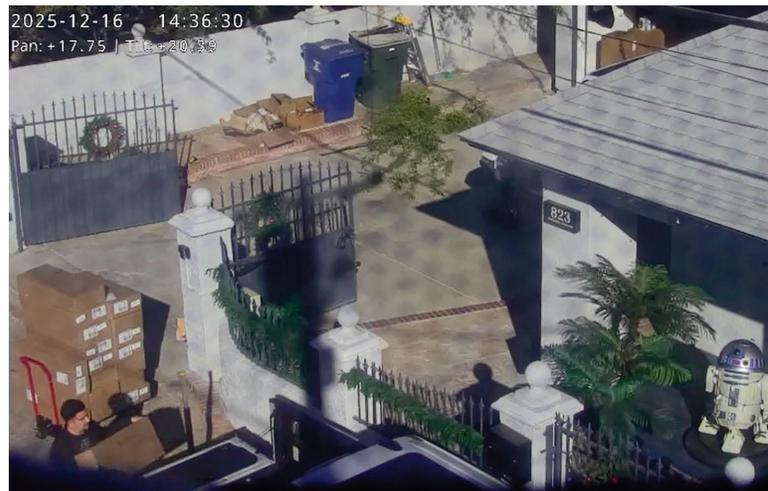
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surveillance obtained during the investigation shows UIM#1 unloading the boxes into the garage at that address, where additional boxes were already visible. A still image from the surveillance footage depicting the unloading of boxes is shown below:



19. On January 13, 2026, a UPS truck parked in the driveway of RAMROOP's residence at 823 S. Arizona Ave. Agents witnessed boxes being removed from the garage and loaded into the UPS truck. The UPS vehicle was subsequently followed to a UPS warehouse located at 899 E. Silverlake Rd. Agents obtained photographs of the packages inside the UPS truck, as well as a close-up image of a shipping label affixed to one of the boxes. These observations and photographs corroborate that diverted medical supplies were being prepared for shipment, consistent with the ongoing resale scheme. A photo of the truck and label are below:

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20. On January 15, 2026, MADRID’s mother S.L. was interviewed. S.L. provided the following information. S.L. said that for the past three years RAMROOP has been in charge of ordering devices for the on base pharmacy. Once or twice a week he steals shipments. He gets around \$100k per batch. She’s seen him come home with boxes, and print labels to ship boxes to resellers. She has seen RAMROOP and MADRID take equipment out of boxes and repackage them for shipping. She helped a couple of times. She has seen RAMROOP communicate on a laptop and phone with resellers. She believes that RAMROOP and MADRID split the money 50/50. She said that MADRID would transfer the money to RAMROOP. S.L. said she received a Porche as a gift from MADRID and other luxury items.

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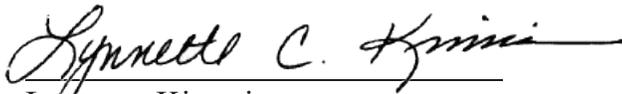
Manuel Madrid

Christopher T.
Wilder

 Digitally signed by Christopher T.
Wilder
Date: 2026.01.16 14:41:39 -07'00'

Christopher Wilder
Special Agent
IRS-CI

Subscribed and sworn to me telephonically
this 16th day of January, 2026.



Lynnette Kimmins
United States Magistrate Judge
District of Arizona