

UNITED STATES DISTRICT COURT
for the
Middle District of Florida

United States of America
v.

OTTIS NICOLE MCCOY JR.

Defendant(s)

Case No.

6:24-mj- 2124

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 December 2016 in the county of Orange in the
Middle District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. § 1708

Offense Description
Stealing, taking, or abstracting mail

This criminal complaint is based on these facts:

See Affidavit

Continued on the attached sheet.

Complainant's signature

Inspector Charles Johnsten, USPS

Printed name and title

Sworn to before me over the telephone or other reliable electronic means and signed by me
pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: 10/25/2024

City and state: Orlando, FL

Daniel C. Irick signature

DANIEL C. IRICK
UNITED STATES MAGISTRATE JUDGE

STATE OF FLORIDA

Case No. 6:24-mj- 2124

COUNTY OF ORANGE

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Charles Johnsten, being duly sworn, state as follows:

INTRODUCTION

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since December 2016. I am currently assigned to the Orlando, Florida, Domicile. Prior to December 2016, I was a Special Agent with the United States Secret Service for nine years, assigned to the Orlando Field Office.

2. Among my duties as a Postal Inspector, I investigate financial crimes, including identity fraud, mail theft, mail fraud, bank fraud, wire fraud, and the use of counterfeit and fraudulent access devices, such as credit cards, debit cards, and gift cards. I also investigate robberies of United States Postal Service (USPS) employees and burglaries of USPS property. Additionally, I have participated in search and seizure operations dealing with the foregoing criminal offenses.

PURPOSE OF AFFIDAVIT

3. I make this affidavit to establish probable cause in support of criminal complaint against Ottis Nicole MCCOY Jr. (MCCOY) for stealing, taking, or abstracting mail, in violation of 18 U.S.C. § 1708.

4. The information in this affidavit is based upon my personal knowledge, information obtained from other law enforcement personnel, and information obtained from corporate investigators. The information set forth in this affidavit is provided solely for the purpose of establishing probable cause for the issuance of a criminal complaint. Because this affidavit is submitted for the limited purpose of establishing such probable cause, it does not include all the details of this investigation known to me.

FACTUAL BASIS

Discarded Mail

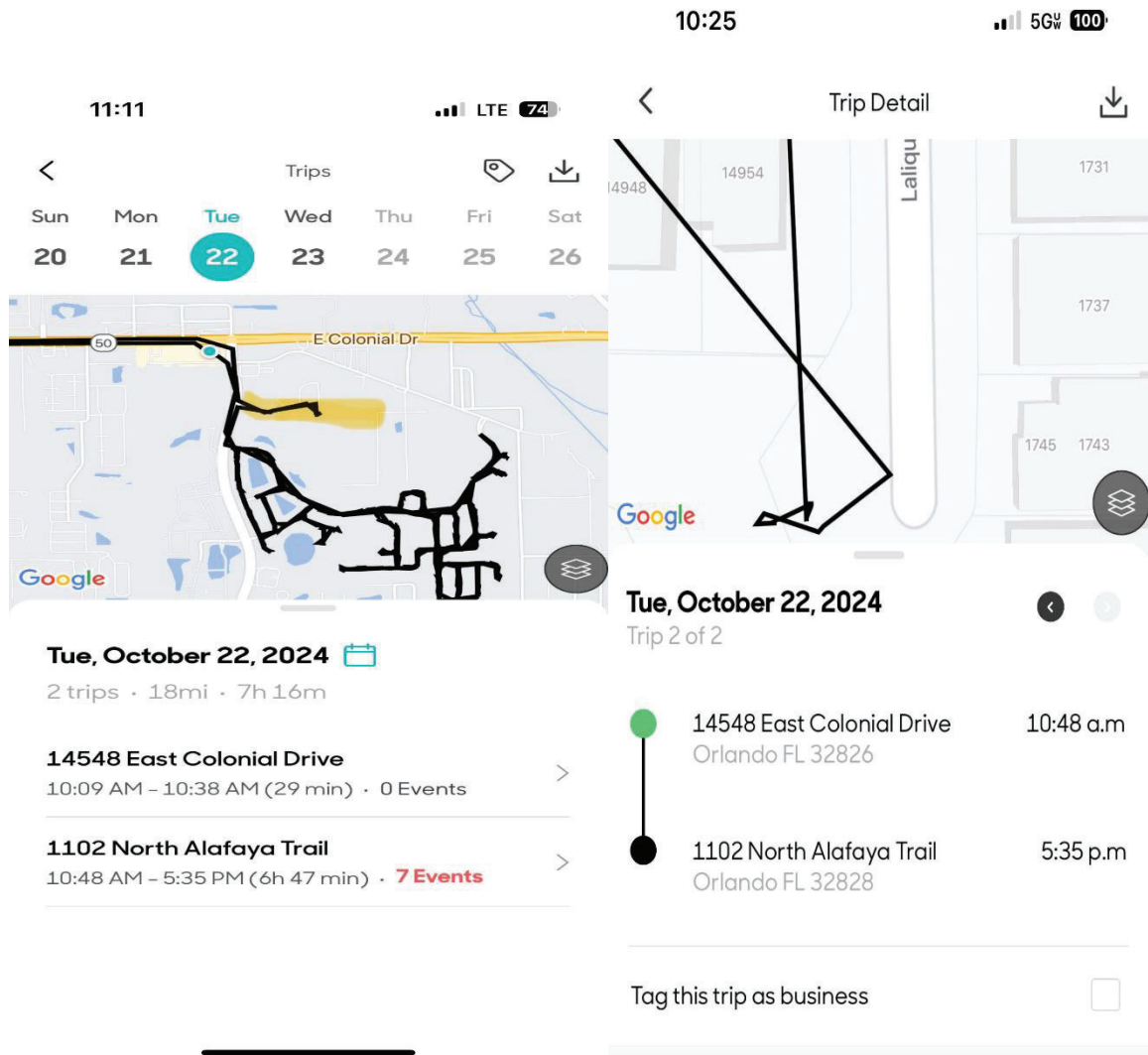
5. On October 23, 2024, the United States Postal Inspection Service was notified by M.C., owner of Cummings Contract Delivery Service Corp., that USPS contract employee Ottis Nicole MCCOY Jr. ("MCCOY") discarded mail in a nearby neighborhood cul-de-sac near the 1700 block of Lalique LN, Orlando, FL 328238.

6. M.C. stated MCCOY was hired by Cummings Contract Delivery Service Corp. on August 6, 2024, as a part time employee to deliver U.S. Mail to a specific postal route (H16) in Orlando, FL. This postal route is in the Alafaya Woods area of Orlando, FL. According to M.C., postal route H16 is assigned a specific contract postal vehicle which is a 2018 White Nissan NV200 Van VIN 3N6CM0KNXJK701761.

7. On October 22, 2024, M.C.'s manager P.K. contacted her when he was concerned that MCCOY may have disposed of U.S. Mail rather than deliver it to the proper addresses. P.K. saw that MCCOY had a very large quantity of U.S. Mail to

deliver on October 22, 2024. P.K. noted this because he assisted MCCOY in loading the 2018 White Nissan NV200 Van in the morning when MCCOY came to work. He later observed that MCCOY had finished his route earlier than expected.

8. As a result of this conversation M.C. checked the installed HUM device to track the vehicles' location. A HUM GPS device is a connected car system from Verizon that uses an On-Board Diagnostic reader to monitor a vehicle's performance and provide a variety of features to include the vehicle's current and past locations. M.C. noticed that MCCOY deviated from his route by turning down Faberge Dr. and then Lalique Ln. The portion highlighted in yellow is a deviation of MCCOY's postal route.



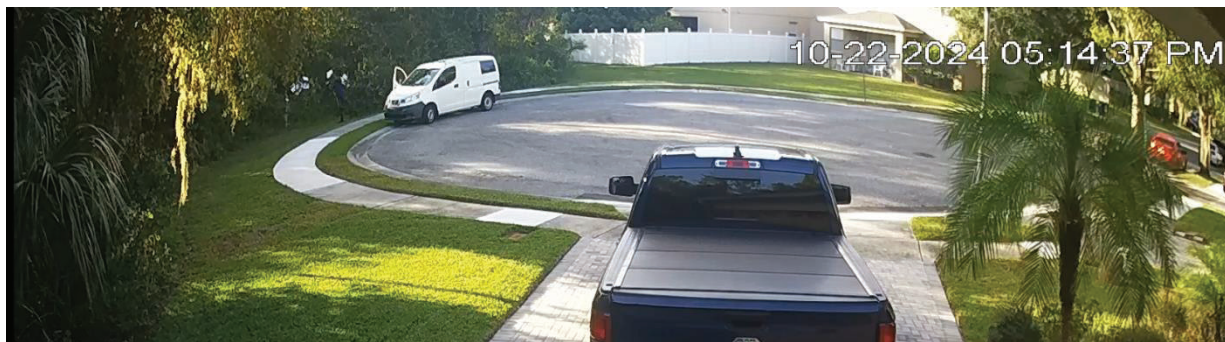
9. After the deviation was observed, M.C. notified P.K. On the morning of October 23, 2024, P.K. went to the area the deviation occurred on Laliqun Ln. and observed several pieces of U.S. Mail in a wooded lot.

10. Your affiant was notified of this incident and responded to the area and discovered several pieces of U.S. Mail scattered in the wooded lot.



11. Inspectors collected the U.S. Mail and discovered more than 1000 pieces of U.S. Mail, including more than 400 pieces of political mail and one election ballot.

12. While on scene I observed that the residence located at 1749 Laliqne Ln. had a surveillance system. I spoke with homeowner J.M. who provided surveillance video of the incident. The surveillance video captured MCCOY arriving at the wooded lot at approximately 5:14 PM on October 22, 2024, in his assigned postal vehicle. The video shows MCCOY throwing large quantities of U.S. Mail into the wooded lot.





13. Your affiant spoke with P.K. on October 24, 2024. P.K. stated he observed MCCOY utilize the contract postal vehicle pictured above. P.K. assisted MCCOY in loading the vehicle with U.S. Mail prior to him leaving the U.S. Post Office on October 22, 2024.

CONCLUSION

14. Based on the foregoing, I submit there is probable cause that on or about October 22, 2024, MCCOY stole, took, or abstracted mail, in violation of 18 U.S.C. § 1708.

Respectfully submitted,

Inspector Charles Johnsten
United States Postal Inspection Service

Affidavit submitted by email and attested to me as true and accurate via Zoom/video conferencing consistent with Fed. R. Crim. P. 4.1 and 41(d)(3), this 25th day of October, 2024.

DANIEL C. IRICK
UNITED STATES MAGISTRATE JUDGE