

TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL

United States v. Larry Jennings

24 MJ 614

Docket Number

SUBMITTED BY: Plaintiff ___ Defendant ___ DOJ
Name: Rebecca Schuman
Firm Name: DOJ-EDNY
Address: 271-A Cadman Plaza East
Brooklyn, New York 11201
Phone Number: (347) 539-1102
E-Mail Address: Rebecca.Schuman@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES ___ NO
If yes, state description of document to be entered on docket sheet:

MANDATORY CERTIFICATION OF SERVICE:

A.) ___ A copy of this application either has been or will be promptly served upon all parties to this action, B.) ___ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: _____; or C.) This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

11/15/2024
DATE

Rebecca Schuman
SIGNATURE

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: _____
Judge/Magistrate Judge: _____
Date Entered: _____

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

ongoing criminal investigation

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

11-15-24

DATED: Brooklyn, NEW YORK

Joseph A. Maritollo

U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE _____
DATE

FTB:RMS
F. #2023R00346

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

LARRY JENNINGS,

Defendant.

----- X

TO BE FILED UNDER SEAL

AFFIDAVIT AND
COMPLAINT IN SUPPORT
OF ARREST WARRANT

(18 U.S.C. §§ 1708, 2 and 3551 et seq.)

No. 24 MJ 614

EASTERN DISTRICT OF NEW YORK, SS:

Erin Nolan, being duly sworn, deposes and states that she is a Special Agent with the United States Postal Service, Office of Inspector General, duly appointed according to law and acting as such.

From approximately August 2021 to at least September 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LARRY JENNINGS, together with others, did knowingly and intentionally steal mail from and out of a post office, and remove from such mail one or more articles and things contained therein, and receive, conceal and unlawfully have in their possession one or more items of mail, and one or more articles and things contained therein, which had been so stolen, knowing the same to have been stolen.

(Title 18, United States Code, Sections 1708, 2 and 3551 et seq.)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the United States Postal Service, Office of Inspector General and have been since approximately February 2021. In this capacity, I have been involved in investigations related to mail theft, money laundering, and various types of fraud.

I. Background

2. The United States Postal Service (the "USPS") is an agency of the United States. Among other functions, the USPS issues postal money orders ("PMOs"), which are negotiable financial instruments offered for sale at USPS post offices in any denomination from \$1 to \$1,000, in exchange for a small service fee, in addition to the value of the desired PMO. Each PMO resembles an ordinary bank check and contains a line for the purchaser to write the name of the entity or individual to whom the value of the PMO is to be paid, referred to as the "payee."

3. Company #1 is a property management company that owns residential rental buildings in New York City. During the relevant time period, at least some of Company #1's tenants paid their rent by using pre-printed envelopes provided by Company #1 to send PMOs (collectively, the "Mail") to Company #1 at an address in Queens, New York (the "Queens Address") via the USPS.

4. The defendant LARRY JENNINGS is employed by the USPS and assigned to the Jamaica Main Post Office, located in Queens, New York. Specifically,

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

JENNINGS is a mail carrier for Route 52, which includes the Queens Address. With respect to the Mail, JENNINGS does not himself deliver it to the Queens Address, but he is responsible for collecting the relevant envelopes in a USPS bin, which then is picked up and delivered to Company #1 at the Queens Address by a parcel post driver (the “Driver”).

II. The Criminal Scheme

5. From approximately August 2021 to at least September 2024, JENNINGS, contrary to the duties and responsibilities of a USPS employee, stole the Mail that customers had placed into the custody of the USPS for delivery to Company #1.

6. After stealing the Mail, JENNINGS passed the PMOs contained therein to co-conspirators who manipulated each PMO to remove Company #1’s name as the intended payee and inscribe another name on the PMO, thereby allowing a person or entity other than Company #1, the true payee, to cash the PMO.

III. The Investigation

A. Use of Surveillance and Test Mail

7. By virtue of his position as a mail carrier for Route 52, JENNINGS exercised control over a portion of the USPS route in which the Mail is removed from the mail stream before reaching its intended destination of the Queens Address. Accordingly, law enforcement has undertaken a number of investigative steps to determine that JENNINGS was, in fact, responsible for stealing the Mail, including the following:

a. In approximately January 2023, law enforcement officers installed a surveillance camera in the truck used by the Driver to determine whether the Driver was taking the Mail after it left the Jamaica Main Post Office but before it reached the Queens


Address. Review of that surveillance footage showed no indication that the Driver stole the Mail.

b. In approximately February 2023, law enforcement officers used both surveillance and mail integrity testing—i.e., the use of test mail—to determine that the Mail arrived at the Jamaica Main Post Office from the USPS processing plant in Brooklyn, New York but then did not arrive at the Queens Address.²

8. Once the Mail arrived at the Jamaica Main Post Office, only JENNINGS and the Driver handled the Mail. Accordingly, by process of elimination, the evidence shows that JENNINGS was responsible for taking the Mail before it reached the Queens Address.

B. Relevant Communications

9. Records provided by a service provider indicate that a certain telephone number (the “Subject Telephone”) has been subscribed to by JENNINGS since approximately 2014. JENNINGS’ USPS personnel file lists the Subject Telephone as his personal telephone number.

10. JENNINGS, using the Subject Telephone, exchanged messages with co-conspirators regarding the Mail, including to arrange in-person meetings to provide the stolen PMOs to these co-conspirators. For example, on or about April 1, 2024, JENNINGS sent the following message to a co-conspirator: “Bring ”.

C. Information Provided by Cooperating Sources

11. To date, two of JENNINGS’ co-conspirators (the “Co-Conspirators”) have admitted to their roles with respect to altering and cashing the PMOs stolen from the Mail by

² Mail integrity testing is an investigative technique whereby investigators introduce test mail into the mail and track the path of the test mail to determine at which point in the sorting and delivery process the mail is removed prior to arrival at its intended destination.

JENNINGS.³ When law enforcement officers separately showed each of the Co-Conspirators a photo array containing six images and asked if they recognized anyone, the Co-Conspirators each identified an image of JENNINGS as the USPS employee who provided the stolen PMOs.

WHEREFORE, your deponent respectfully requests that the defendant LARRY JENNINGS be dealt with according to law.

Respectfully submitted,



Erin Nolan
Special Agent
United States Postal Service
Office of Inspector General

Sworn to before me by telephone
this 15 day of November, 2024



THE HONORABLE JOSEPH A. MARUTOLLO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

³ The Co-Conspirators are attempting to cooperate with law enforcement in the hopes of obtaining leniency at sentencing. The information they have provided has proved to be reliable and has been corroborated by other sources of information. Of the Co-Conspirators, one has a prior conviction for disorderly conduct for which the sentence was a conditional discharge.

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

Larry Jennings

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Case No. 24 MJ 614

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Larry Jennings,
who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Sections 1708 (mail theft)

Date: November 15, 2024

Joseph A. Marutollo

Issuing officer's signature

City and state: Brooklyn, New York

Hon. Joseph A. Marutollo, USMJ

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: Larry Jennings

Known aliases: _____

Last known residence: 10605 Jamaica Ave, #3, Richmond Hill, NY 11418

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 03/08/1980

Social Security number: 080644132

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates *(name, relation, address, phone number)*: _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: _____

Date of last contact with pretrial services or probation officer *(if applicable)*: _____