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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No.
)
Plaintiff,) <u>COUNT 1:</u>
) CONSPIRACY
vs.) Vio. of 18 U.S.C. § 371
)
CONGRESS LEPOU,) <u>COUNTS 2-16:</u>
BREADOFLIFE “PRESLEY”) THEFT OF MAIL
FAIUPU, HUBERT BARTE, PAULO) Vio. of 18 U.S.C. § 1708
MAAE, HAROLD VELICARIA, and)
ROGELIO “ROGER” DAQUIS,) <u>COUNTS 17-33:</u>
) POSSESSION OF STOLEN
Defendants.) MAIL
) Vio. of 18 U.S.C. § 1708
)

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this indictment:

1. Ravn Alaska was a certificated air carrier for the United States Postal Service authorized by the United States Postal Service to deliver mail to Post Offices in villages throughout Alaska.

2. Ravn Alaska employees utilized a company vehicle, including the “supervisor truck,” to pick up mail from the U.S. Postal Service Processing and Distribution Center at 4141 Postmark Dr., Anchorage, AK 99530, and deliver it to the Ravn airplanes at 4700 Old International Airport Rd., Anchorage, AK 99502, for delivery to the Alaskan villages of Saint Marys, Mountain Village, Stebbins, Unalakleet, Emmonak, Kotlik, Alakanuk, Aniak, Greyling, Kalskag, Koyuk, among others.

3. From March 2015 to April 2017, approximately 343 Apple computers went missing after being scanned in by U.S. Postal Service Distribution Center at 4141 Postmark Dr., Anchorage, AK 99530, but before arriving at the U.S. post offices in these villages. The computers had an approximate value of \$380,000.

4. CONGRESS LEPOU was a Ravn Alaska Ramp Agent Lead.

5. BREADOFLIFE “PRESLEY” FAIUPU was a Ravn Alaska Ramp Agent Trainer.

6. HUBERT BARTE was a Ravn Alaska Ramp Agent.

7. PAULO MAAE was a Ravn Alaska Ramp Agent.

8. HAROLD VELICARIA was a Ravn Alaska Ramp Agent from February 25, 2013 to March 26, 2015.

9. ROGELIO “ROGER” DAQUIS was a Ravn Alaska Ramp Agent.

COUNT 1: CONSPIRACY

10. Beginning at a time unknown, but at least March 2015, and continuing through April 13, 2017, the defendants, CONGRESS LEPOU, BREADOFLIFE “PRESLEY” FAIUPU, HUBERT BARTE, PAULO MAAE, HAROLD VELICARIA, ROGELIO “ROGER” DAQUIS, and others known and unknown to the grand jury, in the District of Alaska and elsewhere, did unlawfully and knowingly combine, conspire, confederate and agree with each other to commit offenses against the United States, namely Mail Theft and Possession of Stolen Mail, in violation of Title 18, United States Code, Section 1708.

OBJECT OF THE CONSPIRACY

11. The purpose of the conspiracy was for CONGRESS LEPOU, BREADOFLIFE “PRESLEY” FAIUPU, HUBERT BARTE, PAULO MAAE, HAROLD VELICARIA, ROGELIO “ROGER” DAQUIS, and others known and unknown to the grand jury, to steal, take and embezzle from the mail and mail routes valuable articles sent in packages, and to buy, receive, and

unlawfully possess these articles stolen, taken, and embezzled from the mail, knowing the same to have been stolen, taken, and embezzled.

MANNER AND MEANS

12. The manner and means by which the conspiracy was carried out by the defendants, CONGRESS LEPOU, BREADOFLIFE “PRESLEY” FAIUPU, HUBERT BARTE, PAULO MAAE, HAROLD VELICARIA, ROGELIO “ROGER” DAQUIS, and others known and unknown to the grand jury included the following: LEPOU and FAIUPU used their access to the mail as Ravn Alaska employees to steal, take, and embezzle articles from the mail including Apple computers, among other articles, to unlawfully possess them and sell them to BARTE, MAAE, VELICARIA, DAQUIS, and others known and unknown to the grand jury. BARTE, MAAE, VELICARIA, and DAQUIS bought, received, and unlawfully possessed these articles stolen, taken, and embezzled from the mail knowing the articles had been stolen, taken, and embezzled. The total value of items stolen from the mail during the course of the conspiracy was approximately \$489,000.

13. Specifically, LEPOU and FAIUPU used Ravn Alaska’s supervisor truck—intended for the transportation of mail from the U.S. Postal Service facility to Ravn’s airplanes for delivery to villages—to take articles stolen from the mail and drive them to the Ravn employee parking lot to load into their personal vehicles. LEPOU and FAIUPU worked with the other

defendants to find buyers for the articles stolen from the mail. The defendants shared the proceeds from the sales.

OVERT ACTS

14. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts were committed by the defendants and others in the District of Alaska and elsewhere:

(OA1) On or about March 18, 2015, FAIUPU texted with VELICARIA about a MacBook Pro custom built model valued at \$1,900 that VELICARIA “found” that day in “lost and found.”

(OA2) On or about June 20, 2015, FAIUPU texted with VELICARIA about bringing the “supervisor truck” to the employee parking lot.

(OA3) On or about October 18, 2015, FAIUPU texted with a potential buyer for a computer stolen from the mail.

(OA4) On or about November 15, 2015, FAIUPU texted with VELICARIA about a stolen Apple MacBook Pro laptop computer FAIUPU stole from the mail. VELICARIA bought the laptop from FAIUPU.

(OA5) On or about July 12, 2016, FAIUPU texted with DAQUIS about whether DAQUIS could find a buyer for an Apple computer stolen from the mail and what price to sell the stolen computer.

(OA6) On or about July 26, 2016, LEPOU stole an Apple MacBook Pro laptop from the mail en route to the village of Saint Mary's and sold it to BARTE. BARTE sold the stolen laptop to his brother in Kodiak.

(OA7) On or about August 28, 2016, FAIUPU stole an Apple MacBook Pro laptop computer from the mail en route to the Lower Yukon School District. FAIUPU sold the stolen laptop to VELICARIA.

(OA8) On or about August 28, 2016, LEPOU stole from the mail at least seven Apple MacBook Pro laptops en route to the Lower Yukon School District in Mountain Village and a MacBook Air. LEPOU sold these computers to MAAE, DAQUIS, and BARTE who sold most of the computers to other individuals.

(OA9) On or about August 30, 2016, LEPOU sold MAAE five Apple MacBook Pro laptop computers LEPOU had stolen from the mail. MAAE kept one computer for himself, sold one computer and gave the other three away.

(OA10) On or about September 1, 2016, LEPOU stole from the mail one MacBook Air laptop.

(OA11) On or about September 8, 2016, LEPOU stole from the mail an Apple MacBook Air Laptop en route to the Bering Strait School District in Unalakleet. LEPOU sold the laptop to BARTE. BARTE sold the laptop to someone in Kodiak.

(OA12) On or about September 14, 2016, VELICARIA activated the stolen Apple MacBook Pro computer he received from FAIUPU on August 28, 2016.

(OA13) On or about October 13, 2016, LEPOU stole from the mail an Apple MacBook Pro laptop en route to the Tukurngailnguq School in Stebbins, and a MacBook Pro laptop en route to the Bering Strait School District in Unalakleet. LEPOU sold the laptops to BARTE. BARTE kept both laptops.

(OA14) On or about October 15, 2016, LEPOU stole from the mail a MacBook Air laptop en route to the Bering Strait School District in Unalakleet. LEPOU sold the laptop to VELICARIA. VELICARIA sold the laptop to a co-worker.

(OA15) On or about November 7, 2016, LEPOU stole from the mail an Apple MacBook Air laptop en route to the Bering Strait School District in Unalakleet. LEPOU sold the laptop to BARTE. BARTE sold the laptop to someone in Kodiak.

(OA16) On or about November 17, 2016, FAIUPU stole an Apple MacBook Pro laptop computer from the mail and texted with someone trying to find a buyer.

(OA17) On or about November or December of 2016, LEPOU stole from the mail an Apple MacBook Air laptop en route to the Bering Strait School District in Unalakleet. LEPOU sold the laptop to DAQUIS.

(OA18) On or about December 3, 2016, LEPOU stole from the mail an Apple MacBook Pro laptop en route to Juneau. LEPOU sold this laptop to BARTE. BARTE sold the laptop to someone in Kodiak.

(OA19) On or about December 9, 2016, LEPOU stole from the mail an Apple MacBook Pro laptop computer en route to the Lower Yukon School District in Mountain Village. LEPOU texted with VELICARIA about the stolen laptop. LEPOU sold this laptop to VELICARIA.

(OA20) On or about December 10, 2016, LEPOU stole from the mail two Apple MacBook Pro laptops en route to the Lower Yukon School District in Mountain Village. LEPOU sold these laptops to BARTE.

(OA21) On or about January 3, 2017, FAIUPU texted with someone trying to find a buyer for a stolen iMac desktop computer.

(OA22) On or about January 6, 2017, LEPOU stole from the mail four Apple iMac desktop computers en route to the Lower Yukon School District in Mountain Village. LEPOU sold two of the desktops to BARTE and two of the desktops to DAQUIS.

(OA23) On or about February 4, 2017, LEPOU stole from the mail two Apple Mac Mini desktop computers en route to Unalakleet. LEPOU kept these stolen desktops and had them in his possession on April 13, 2017.

(OA24) On or about April 13, 2017, LEPOU, in addition to the two Apple computers listed above, possessed more than 667 cartons of cigarettes stolen from the mail and 305 cans of chewing tobacco stolen from the mail. LEPOU also possessed eight GCI prepay cellular phones stolen from the mail with an approximate total value of \$109,000.

(OA25) Also on or about April 13, 2017, MAAE possessed fifteen cellular phones and two MacBook Pro laptop computers that had been stolen from the mail.

(OA26) Also on or about April 13, 2017, VELICARIA possessed an Apple MacBook Pro laptop stolen from the mail.

All of which is in violation of Title 18, United States Code, Section 371.

COUNT 2-16: THEFT OF MAIL

15. On or about the dates listed below by count, in the District of Alaska, the defendants listed below by count, did steal, take, remove and embezzle packages from the mail and a mail route with the intent to deprive the owner, temporarily or permanently, of its use and benefit:

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Count	Date	Defendant	Description
2	November 15, 2015	BREADOFLIFE "PRESLEY" FAIUPU	Apple MacBook Pro laptop computer
3	July 26, 2016	CONGRESS LEPOU	Apple MacBook Pro laptop computer
4	August 28, 2016	BREADOFLIFE "PRESLEY" FAIUPU	Apple MacBook Pro laptop computer
5	August 28, 2016	CONGRESS LEPOU	Seven MacBook Pro laptop computers
6	September 1, 2016	CONGRESS LEPOU	Apple MacBook Air laptop computer
7	September 8, 2016	CONGRESS LEPOU	Apple MacBook Air laptop computer
8	October 13, 2016	CONGRESS LEPOU	Two Apple MacBook Pro laptop computers
9	October 15, 2016	CONGRESS LEPOU	Apple MacBook Air laptop computer
10	November 7, 2016	CONGRESS LEPOU	Apple MacBook Air laptop computer
11	November 17, 2016	BREADOFLIFE "PRESLEY" FAIUPU	Apple MacBook Pro laptop computer
12	December 3, 2016	CONGRESS LEPOU	Apple MacBook Pro laptop computer
13	December 9, 2016	CONGRESS LEPOU	Apple MacBook Pro laptop computer
14	December 10, 2016	CONGRESS LEPOU	Two Apple MacBook Pro laptop computers
15	January 6, 2017	CONGRESS LEPOU	Four Apple iMac desktop computers
16	February 4, 2017	CONGRESS LEPOU	Two Apple Mac Mini desktop computers

All in violation of Title 18, United States Code, Section 1708.

COUNTS 17-33: POSSESSION OF STOLEN MAIL

16. On or about the dates listed below by count, in the District of Alaska, the defendants listed below by count, bought, received, and unlawfully possessed articles, described below, that had been stolen, taken, and embezzled from the mail and a mail route knowing the articles to have been stolen, taken and embezzled:

Count	Date	Defendant	Description
17	November 15, 2015	HAROLD VELICARIA	Apple MacBook Pro laptop computer
18	July 26, 2016	HUBERT BARTE	Apple MacBook Pro laptop computer
19	August 30, 2016	PAULO MAAE	Five MacBook Pro laptop computers
20	August 30, 2016	ROGELIO "ROGER" DAQUIS	Two Apple MacBook Pro laptop computer
21	September 1, 2016	HUBERT BARTE	MacBook Air laptop computer
22	September 8, 2016	HUBERT BARTE	Apple MacBook Air laptop computer
23	September 14, 2016	HAROLD VELICARIA	Apple MacBook Pro laptop computer
24	October 13, 2016	HUBERT BARTE	Two Apple MacBook Pro laptop computers
25	October 15, 2016	HAROLD VELICARIA	Apple MacBook Air laptop computer
26	November 7, 2016	HUBERT BARTE	Apple MacBook Air laptop computer
27	December 3, 2016	HUBERT BARTE	Apple MacBook Pro laptop computer

28	December 9, 2016	HAROLD VELICARIA	Apple MacBook Pro laptop computer
29	December 10, 2016	HUBERT BARTE	Two Apple MacBook Pro laptop computers
30	January 6, 2017	ROGELIO "ROGER" DAQUIS	Two Apple iMac desktop computers
31	January 6, 2017	HUBERT BARTE	Two Apple iMac desktop computers
32	April 13, 2017	CONGRESS LEPOU	Cigarettes; chewing tobacco; and cellular phones
33	April 13, 2017	PAULO MAAE	Fifteen cellular phones; two MacBook Pro laptop computers

All in violation of Title 18, United States Code, Section 1708.

A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Andrea T. Steward
ANDREA T. STEWARD
United States of America
Assistant U.S. Attorney

s/ Bryan Schroder
BRYAN SCHRODER
United States of America
United States Attorney

DATE: 1/16/2018