

6. USPS issues keys to its employees to access the collection boxes. These keys are configured to open multiple collection boxes in a defined geographic location. USPS identifies these keys with serial numbers and monitor their locations using a log system at local post offices.

7. The "Pro Pad" device is tool used to clone keys to vehicles using a port located within the stolen vehicles; usually in a concealed location known to mechanics and manufactures of the vehicles. The device is plugged into the vehicle which allows keys to be cloned.

COUNT 1

(Conspiracy to Commit Sale or Receipt of Stolen Vehicles, 18 U.S.C. §§ 371 and 2313)

The Grand Jury charges:

8. The factual allegations contained in paragraphs 1 through 7 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

9. From in or around December 2021, through in or around February 2022, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants JAYLEN HARRIS, LAVELLE JONES, DEVIN RICE, HAKIM BENJAMIN, and others known and unknown to the Grand Jury, knowingly and willfully conspired and agreed together and with each other to receive, possess, conceal, store, barter, sell and dispose of stolen motor vehicles, which vehicles had crossed a State boundary after being stolen, to wit, said vehicles being stolen in Michigan and subsequently brought into the State of Ohio, knowing the same to have been stolen, in violation of Title 18, United States Code, Sections 371 and 2313.

MANNER AND MEANS OF THE CONSPIRACY

10. The manner and means by which the conspirators sought to accomplish the conspiracy included, among others, the following:

- a) Defendants and their coconspirators stole vehicles from various car dealerships in the State of Michigan.
- b) Defendants and their coconspirators transported the vehicles from Michigan to the Northern District of Ohio.
- c) Defendants and their coconspirators sold the vehicles in the Northern District of Ohio.

ACTS IN FURTHERANCE OF THE CONSPIRACY

11. In furtherance of the conspiracy and to effect its unlawful object, Defendants JAYLEN HARRIS, LAVELLE JONES, DEVIN RICE, HAKIM BENJAMIN, and others known and unknown to the Grand Jury committed, and caused to be committed, the following acts in furtherance of the conspiracy in the Northern District of Ohio, and elsewhere:

- a) On or about December 8, 2021, HARRIS possessed and transported a 2022 Dodge Durango with VIN number XX0219 that was stolen from Auburn Hills, Michigan.
- b) On or about December 15, 2021, HARRIS possessed a 2022 Dodge Durango with VIN number XX0219 that was stolen from Auburn Hills, Michigan. Specially, the vehicle was parked at HARRIS' apartment complex.
- c) On or about December 11, 2021, HARRIS, JONES, and RICE possessed and transported a 2021 Dodge Durango with VIN number XX0877 that was stolen from Detroit, Michigan.
- d) On or about January 6, 2022, HARRIS and JONES possessed and transported a 2022 Dodge Ram TRX with VIN number XX6070 that was stolen from Detroit, Michigan.

- e) On or about January 6, 2022, HARRIS and JONES possessed and transported a 2022 Dodge Ram TRX with VIN number XX9450 that was stolen from Detroit, Michigan.
- f) On or about January 6, 2022, HARRIS and JONES possessed and transported a 2022 Dodge Durango Hellcat with VIN number XX0853 that was stolen from Detroit, Michigan.
- g) On or about January 6, 2022, HARRIS and JONES possessed and transported a 2022 Dodge Durango Hellcat with VIN number XX0378 that was stolen from Detroit, Michigan.
- h) On or about January 13, 2022, HARRIS sold a 2022 Dodge Ram TRX with VIN number XX6070 that was stolen from Detroit, Michigan.
- i) On or about January 25, 2022, HARRIS and JONES possessed and transported a Charger Hellcat with VIN number XX5248 that was stolen from Sterling Heights, Michigan.
- j) On or about February 5, 2022, HARRIS possessed a 2020 Dodge Ram TRX with VIN number XX0844 that was stolen from Sterling Heights, Michigan. Specifically, the vehicle was parked at HARRIS' apartment complex.
- k) On or about February 5, 2022, HARRIS and BENJAMIN possessed an Audi 8 with a tampered VIN number bearing Ohio dealer plate 004-8258 that as stolen from Burton, Michigan. Specifically, the vehicle was parked at HARRIS' apartment complex.

- l) On or about February 26, 2022, HARRIS and JONES possessed and transported a Dodge Challenger with VIN number XX0292 that was stolen from Indianapolis, Indiana.
- m) On or about February 27, 2022, BENJAMIN possessed a 2022 Dodge Hellcat with VIN number XX0297 that was stolen from Detroit, Michigan. Specifically, BENJAMIN was driving the vehicle in Ottawa County, Ohio.

COUNT 2

(Sale or Receipt of Stolen Vehicles, 18 U.S.C. § 2313)

The Grand Jury further charges:

12. The factual allegations contained in Paragraphs 1 through 7 and 10 through 11 are re-alleged and incorporated as though fully set forth herein.

13. On or about January 6, 2022, in the Northern District of Ohio, Eastern Division, Defendants JAYLEN HARRIS and LAVELLE JONES did possess a stolen motor vehicle, that is, a 2022 Dodge Ram TRX with VIN number XX6070, which vehicle had crossed a State boundary after being stolen, to wit, said vehicle being stolen on or about January 6, 2022, in Detroit, Michigan and subsequently brought into the State of Ohio knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313.

COUNT 3

(Sale or Receipt of Stolen Vehicles, 18 U.S.C. § 2313)

The Grand Jury further charges:

14. The factual allegations contained in Paragraphs 1 through 7 and 10 through 11 are re-alleged and incorporated as though fully set forth herein.

15. On or about December 11, 2021, in the Northern District of Ohio, Eastern Division, Defendants JAYLEN HARRIS, LAVELLE JONES, and DEVIN RICE did possess a

stolen motor vehicle, that is, a 2021 Dodge Durango with VIN number XX0877, which vehicle had crossed a State boundary after being stolen, to wit, said vehicle being stolen on or about December 11, 2021 in Detroit, Michigan, and subsequently brought into the State of Ohio, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313.

COUNT 4

(Sale or Receipt of Stolen Vehicles, 18 U.S.C. § 2313)

The Grand Jury further charges:

16. The factual allegations contained in Paragraphs 1 through 7 and 10 through 11 are re-alleged and incorporated as though fully set forth herein.

17. On or about February 27, 2022, in the Northern District of Ohio, Eastern Division, Defendant HAKIM BENJAMIN did possess a stolen motor vehicle, that is, a 2022 Dodge Hellcat with VIN number XX0297, which vehicle had crossed a State boundary after being stolen, to wit, said vehicle being stolen on or about February 26, 2022, in Detroit, Michigan and subsequently brought into the State of Ohio, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313.

COUNT 5

(Possession of Stolen Mail, 18 U.S.C. § 1708)

The Grand Jury further charges:

18. The factual allegations contained in Paragraphs 1 through 7 and 10 through 11 are re-alleged and incorporated as though fully set forth herein.

19. On or about January 31, 2022, in the Northern District of Ohio, Eastern Division, Defendants DEVIN RICE and LAVELLE JONES did unlawfully have in their possession mail, which had been stolen, taken, embezzled and abstracted from a letter box, which was an authorized depository for mail matter, knowing the said mail to have been stolen, taken,

embezzled and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

COUNT 6
(Possession of Stolen Mail, 18 U.S.C. § 1708)

The Grand Jury further charges:

20. The factual allegations contained in Paragraphs 1 through 7 and 10 through 11 are re-alleged and incorporated as though fully set forth herein.

21. On or about February 10, 2022, in the Northern District of Ohio, Eastern Division, Defendants JAYLEN HARRIS and LAVELLE JONES did unlawfully have in their possession mail, which had been stolen, taken, embezzled and abstracted from a letter box, which was an authorized depository for mail matter, knowing the said mail to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

COUNT 7
(Illegal Possession of a Machine Gun, 18 U.S.C. §§ 922(o) and 924(a)(2))

The Grand Jury further charges:

22. The factual allegations contained in Paragraphs 1 through 7 and 10 through 11 are re-alleged and incorporated as though fully set forth herein.

23. On or about February 10, 2022, in the Northern District of Ohio, Eastern Division, Defendant JAYLEN HARRIS did knowingly and unlawfully possess a firearm as defined in Title 26, United States Code, Section 5845(a)(6), that is, a machinegun within the meaning of Title 26, United States Code, Section 5845(b), and more particularly described as a Glock 26, 9mm pistol, serial number AFYS184, modified so that it shoots automatically more

than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT 8

(Aiding and Abetting Robbery of Postal Carrier, 18 U.S.C. §§ 2114(a) and 2)

The Grand Jury further charges:

24. The factual allegations contained in Paragraphs 1 through 7 and 10 through 11 are re-alleged and incorporated as though fully set forth herein.

25. On or about January 31, 2022, in the Northern District of Ohio, Eastern Division, Defendant DEVIN RICE, aiding and abetting another, did assault a United States Postal Service carrier, a person having lawful charge, custody, and control of United States mail matter, money, and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, in violation of Title 18, United States Code, Section 2114(a) and 2.

COUNT 9

(Stealing Keys Adopted by the Post Office, 18 U.S.C. § 1704)

The Grand Jury further charges:

26. The factual allegations contained in Paragraphs 1 through 7 and 10 through 11 are re-alleged and incorporated as though fully set forth herein.

27. On or about January 31, 2022, in the Northern District of Ohio, Eastern Division, Defendant DEVIN RICE knowingly and unlawfully possessed a key suited to any lock adopted by the Post Office Department or the Postal Service and in use on any of the mails or bags thereof, with the intent unlawfully and improperly to use, sell, and otherwise dispose of that mail key, and caused at least one key to be unlawfully and improperly used, sold, and disposed of, in violation of Title 18, United States Code, Section 1704.

FORFEITURE

The Grand Jury further charges:

28. The allegations contained in Counts 1-9 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(5)(E) (stolen vehicles offenses), Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) (possession of stolen mail offenses and the aiding and abetting robbery of postal carrier offense); and, Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) (firearms offense). As a result of these offenses, Defendants JAYLEN HARRIS, LAVELLE JONES, DEVIN RICE, and HAKIM BENJAMIN shall forfeit to the United States: (i) all property, real and personal, which represents – or is traceable to – the gross proceeds obtained, directly or indirectly, as a result of the stolen vehicles offenses; (ii) all property, real and personal, which constitutes - or is derived from – proceeds traceable to the possession of stolen mail offenses and the aiding and abetting robbery of postal carrier offense; and, (iii) all firearms and ammunition involved in or used in the commission of the firearms offense; including, but not limited to, the following:

a.) Glock 26, 9mm pistol, serial number AFYS184, modified so that it shoots automatically more than one shot, without manual reloading, by a single function of the trigger.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.