

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, Brian Clarity, hereinafter referred to as your affiant, a Special Agent of the Federal Bureau of Investigation (FBI), being duly sworn, state and depose as follows:

BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so since March 2010. I am currently assigned to the FBI's San Juan Division, Violent Crimes / Major Offenders Squad. As an FBI Special Agent I have received extensive training in a variety of investigative and legal matters of violations of federal and state law. Your affiant is "an investigative or law enforcement officer of the United States" within the meaning of Section 2510 (7) of Title 18, United States Code. Your affiant is therefore, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in Title 18, United States Code. During my employment with the FBI, I have participated in various violent crime investigations along with other FBI Special Agents (SAs) and other Task Force Officers (TFOs).
2. The information contained in this affidavit was obtained from the investigation conducted by your affiant in addition to information provided to your affiant by other local and federal law enforcement agents. Because this affidavit is made for the limited purpose of establishing probable cause for the arrest warrant, your affiant has not recited each and every fact known to your affiant as a result of this investigation.

RELEVANT FACTUAL ALLEGATIONS

3. On or around October 31, 2021, three victims were carjacked and kidnapped outside of El Hipopótamo restaurant within the District of Puerto Rico by several armed subjects (UNSUBS). One victim, VICTIM 1, an approximately 83-year-old male, was forced into a white Ford van, belonging to VICTIM 1, and two additional victims, VICTIM 2, an approximately 31-year-old male, and VICTIM 3, a teenage male, were forced into an orange Jeep Patriot. The UNSUBS then fled the scene with the three victims.
4. As the UNSUBS took custody of the three victims, an employee for the restaurant observed VICTIM 1 being forced into VICTIM 1's white van by a larger male wearing all black. The employee described the UNSUB as approximately six feet tall and weighing approximately 300 pounds. After observing this, the employee fired several gunshots at the orange Jeep Patriot as it fled from the restaurant.
5. While in the custody of the UNSUBS, VICTIM 2 was instructed to make a phone call with his telephone to the restaurant employee for the purpose of instructing the employee to access the restaurant's safe. VICTIM 2 advised the employee that VICTIM 2 and VICTIM 3 were also kidnapped.
6. While in the custody of the UNSUBS, the phone of VICTIM 2 was used on several occasions to negotiate a ransom with the father of VICTIM 2.
7. VICTIM 2 advised that he and VICTIM 3 were later transferred from the Jeep Patriot into the white van with VICTIM 1.
8. VICTIM 2 described the UNSUB driving the white van as a larger male with light skin. VICTIM 2 recalled that the white van stopped at a gas station and the driver of the van, the larger light-skinned male, got out to purchase food and drinks for the victims. VICTIM 2

further advised that the driver also purchased a pack of cigarettes. Based on the smell of the cigarettes, VICTIM 2 believed them to be menthol flavored.

9. VICTIM 2 recalled that one of the UNSUBS fired a Glock pistol while VICTIM 2 was talking to his father on the phone. Following the firing of the weapon by one of the UNSUBs in the white van, VICTIM 2 observed that VICTIM 3 had been struck with a bullet or fragment and started bleeding.
10. The father of VICTIM 2 continued negotiations with the UNSUBS with the assistance of the FBI. Negotiations were made to drop a ransom payment within the vicinity of the restaurant. A GPS tracker was embedded in the ransom money package. The ransom money was placed in a black plastic bag and placed outside of the restaurant at approximately 5:45 am on October 31, 2021.
11. Prior to the delivery of the ransom money, agents from the FBI observed a white Mitsubishi Outlander circling the area where the money was to be dropped. After the money was delivered, agents observed the same white Mitsubishi Outlander stop in close proximity to where the money was dropped. After the white Outlander stopped at the money drop location, the GPS tracking embedded with the money began to move. Agents from the FBI followed the GPS tracker electronically. After the money was delivered, the three victims arrived outside of a Puma gas station along Route 1 near Caguas, Puerto Rico. Security footage from the Puma gas station captured VICTIM 2 arrive at approximately 6:05 am. When law enforcement arrived at the gas station, VICTIM 3 was found deceased.
12. The GPS tracker was ultimately tracked to a location in Barrio Obrero in the area of Calle Rosal, near Residencial Las Margaritas. Agents from the FBI obtained security video from a nearby residence and observed four UNSUBS exit a white Mitsubishi Outlander with black

bags and enter a residence. The security footage also captured four UNSUBS exit the same residence and enter the white Mitsubishi Outlander with a black bag and flee the area.

13. The FBI conducted an interview with the owner of the residence. He advised that his son, LUIS AULET-MALDONADO periodically stays in a first-floor apartment where agents observed the four UNSUBS enter and exit on security footage. The owner identified his son, AULET-MALDONADO, as one of the individuals captured on security footage exiting the white Outlander. AULET-MALDONADO was seen exiting the Outlander carrying the black bags and a balaclava style mask.
14. The father/owner of the house advised that AULET-MALDONADO utilized telephone number 210-█-9130.
15. A United States Probation (USP) Officer contacted the FBI and—based on the video and/or stillshots of the surveillance video—identified one of the UNSUBS as GEOFFLEY JOMAR PEREZ, who was being supervised by the USP Officer. The USP Officer provided telephone number 787-█-3895 as a telephone number used by PEREZ on file with the supervising USP Officer.
16. An emergency records request was submitted for call detail records to T-Mobile for records related to 210-█-9130 (AULET-MALDONADO), 787-█-3895 (PEREZ), and 787-█-5963 (VICTIM 2). The following observations were made through analysis of the call detail and location data:
 - a. A call to/from 787-█-5963 (VICTIM 2) at 12:07 am on 10/31/2021 and a call to/from 210-█-9130 (AULET-MALDONADO) at 12:08 am on 10/31/2021 connected to two different cell towers within 500 meters of each other. These cell towers are located in Caguas, PR

- b. A call to/from 787-█-5963 (VICTIM 2) at 12:32 am on 10/31/2021, a call to/from 210-█-9130 (AULET-MALDONADO) at 12:36 am on 10/31/2021, and a call to/from 787-█-3895 (PEREZ) at 12:36 am on 10/31/2021 connected to the same cell tower and same cell tower sector. This cell tower is located approximately 12 kilometers south of Caguas, PR.
- c. A call to/from 787-█-5963 (VICTIM 2) at 2:37 am on 10/31/2021 and a call to/from 787-█-3895 (PEREZ) at 2:34 am on 10/31/2021 connected to the same cell tower and same cell tower sector. This cell tower is located approximately 15 kilometers south of Caguas, PR.
- d. Between 12:00 am and 5:04 am on October 31, 2021, 14 telephone calls were placed from 787-█-3895 (PEREZ) to 210-█-9130 (AULET-MALDONADO).

- 17. The security video from the area of the residence where the Mitsubishi Outlander parked after the money was picked up captured four UNSUBS exit the white Mitsubishi Outlander all wearing black long sleeve shirts. The UNSUBS then enter a residence and when they exit, only three UNSUBS are wearing black long sleeve shirts. A fourth UNSUB was observed by security footage wearing a black tank top when he exits the residence.
- 18. The owner of the residence where the UNSUBS are observed entering and exiting provided consent to search that apartment. During the search of the apartment, a black, long-sleeve shirt was found in the living room. Inside a pocket of the black shirt was a pack of menthol flavored Newport brand cigarettes.

19. A search of the Puerto Rico Driver and Vehicle Information Database was conducted for LUIS CABAN. CABAN-NIEVES is listed as 5 feet, 11 inches tall and weighing 280 pounds.
20. The security footage from the residence near Residential Las Margaritas, where the GPS tracker embedded in the ransom money was last located, was compared to the Puerto Rico Driver and Vehicle Information Database for LUIS CABAN-NIEVES. The photo below on the left was captured by security footage and the photo on the right is the Puerto Rico Driver and Vehicle Information Database photo of LUIS CABAN-NIEVES.

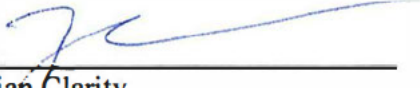


21. Based on my training and experience, I know that Ford vehicles are not manufactured in Puerto Rico, therefor the Ford van belonging to VICTIM 1 was transported or shipped through interstate or foreign commerce.

CONCLUSION

22. Based on the information above, your affiant submits that there is probable cause to believe that GEOFFLEY JOMAR PEREZ, LUIS AULET-MALDONADO, and LUIS CABAN-NIEVES violated the following federal offenses: Title 18 United States Code, Section 2119(3) carjacking result in death; Title 18 United States Code, Section 1201 kidnapping resulting in death; Title 18, United States Code, Section 924(c)(1)(A)(iii) discharging of a Firearm during the Commission of a Violent Crime; Title 18, United States Code, Section 924(j), Causing death of a person through the use of a firearm; Title 18, United States Code, Section 2, Aiding and abetting.

I hereby declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.



Brian Clarity
Special Agent
Federal Bureau of Investigation

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone in San Juan, Puerto Rico, on November 3, 2021. *at 4:19 pm.*



UNITED STATES MAGISTRATE JUDGE MARSHAL D. MORGAN
DISTRICT OF PUERTO RICO