

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Mark Munoz, Special Agent of the United States Postal Service Office of Inspector General, being duly sworn, depose and state that:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been a Special Agent with U.S. Postal Service Office of Inspector General (hereinafter referred to as the "Investigative Agency") since June 2015. I was trained at the Federal Law Enforcement Training Center in Glynco, GA, and at the U.S. Secret Service's James J. Rowley Training Center. I have training and experience in the enforcement of laws in the United States, including training on how to conduct U.S. Mail theft related investigations, search and seizure laws and evidence handling and processing. I am currently assigned to the Cleveland, OH Field Office. As an Investigative Agency Special Agent, I have conducted numerous investigations into the theft of U.S. Mail and employee misconduct. Prior to my employment with the Investigative Agency, I was a Special Agent with the U.S. Secret Service from March 2002 until June 2015, wherein I conducted complex financial fraud cases involving counterfeit checks, government program assistance fraud, access

device fraud, bank fraud and the investigation of counterfeit U.S. currency.

2. As a Special Agent, I have prepared and executed search and seizure, and arrest warrants. I have been the case agent in many investigations leading to convictions in both U.S. District Court and state courts. I have received training in the detection and investigation of mail theft and am familiar with the methods by which person(s) steal mail, especially as they relate to the Postal Service, including the handling, rifling, storage, transportation, and the concealment of U.S. Mail. I have also gained experience in the interception of visual, non-verbal conduct and activities by means of covert digital video recorder (DVR) cameras in connection with various investigations. Many of those recordings resulted in the capturing of visual evidence of criminal activity.

3. I am an investigative or law enforcement officer of the United States, within the meaning of Section 3061 of Title 18, United States Code, and empowered by law to conduct investigations and to make arrests for crimes involving postal offenses and civil matters, or other violations of federal laws regarding the Postal Service, property of the Postal Service, and the use of the mails, among others. As a federal law enforcement officer, I am authorized to investigate offenses such as

violations of 18 U.S.C. § 1709 (Theft of mail by postal employee).

4. Based on my training and experience, I know that U.S. Mail is often used by Postal Service customers to mail items of value. I also know from my training and experience that all classes of U.S. Mail, specifically Priority and Express Mail, and First-Class mail are commonly used to transport items of value because they provide traceability, reliability, and timely delivery. I also know from my experience that because Postal Service employees handle the mail daily, they have learned that larger than normal-sized parcels, parcels with high postage amounts, parcels shipped via Priority or Priority Express class may also contain items of value. Postal Service employees also identify, and target parcels sent to specific individuals or businesses, who based on their knowledge, deal in rare or expensive goods for sale, are all indicators of parcels containing items of value.

5. I am aware that Title 18, United States Code, Section 1709, makes it a crime for a U.S. Postal Service employee to steal, abstract, or remove from any such letter, package, bag, or mail, any article or thing contained therein.

**PURPOSE OF AFFIDAVIT**

6. The information in this affidavit is provided for the limited purpose of establishing probable cause to believe that Bruce C. Murdock Jr. ("MURDOCK") has committed violations of 18 U.S.C. § 1709. It does not include every fact and detail known to me through my participation in this investigation.

7. At all times relevant to this affidavit, MURDOCK was an employee of the United States Postal Service as the West Area Post Office Operations Manager (POOM). MURDOCK is assigned as the West Area POOM, where he maintained his official Postal Service office at the Massillon Post Office, 333 Erie St. South, Massillon, OH 44646 ("OFFICE"). The Massillon Post Office is in, and services U.S. Postal Service customers in the Northern District of Ohio.

**PROBABLE CAUSE AS TO CRIMINAL VIOLATIONS**

8. On March 17, 2022, the Investigative Agency prepared a controlled parcel mailing, which was a large, Express Mail parcel box, bearing tracking number EJ 936 350 351 US, addressed to 7301 Knight St. NW, Massillon, OH 44646, which contained a Louis Vuitton purse wrapped in pink tissue paper. The controlled parcel also contained a greeting card inside a pink-colored envelope which contained \$40.00 in known denominations of U.S.

Currency, marked for identification purposes along with a \$10 Starbucks gift card, card number 6140882472647669.

9. Continuing the same day, at approximately 1154 hours, the Investigative Agency initiated physical surveillance at the Massillon Post Office to observe and assess the handling of letter and parcel mail, and the personnel assigned to the Massillon Post Office. The Investigative Agency introduced the two controlled parcel mailings into the mail stream at approximately 1221 hours. At approximately 1223 hours, MURDOCK entered onto the workroom floor, walked directly over to a cart with express mail destined to be delivered in the Massillon area that day. MURDOCK inspected each express mail parcel, then picked up and walked off with two larger Express Mail parcels and two Express Mail flat-rate envelopes, which included the controlled parcel mailing, walking across the workroom floor to the door leading to the OFFICE.

10. At approximately 1229 hours the same day, MURDOCK, while in the OFFICE, picked up and examined the address label of the controlled Express Mail parcel box, tracking number EJ 936 350 351 US. MURDOCK then removed a pair of scissors from his desk drawer and cut the taped seams of the box open. Murdock opened the box flaps, exposing the pink tissue paper in the controlled Express Mail parcel. Murdock stood up, reached under

the purse that was wrapped in the pink tissue paper and removed the pink greeting card from the controlled parcel. He set the pink greeting card/envelope on the corner of his desk, then resealed the control parcel with two short lengths of packing tape.

11. At approximately 1230 hours, MURDOCK exited the OFFICE with the mail parcels he had previously removed from the mail stream, leaving the pink colored greeting card he removed from the controlled parcel mailing sitting atop two parcel box mail items that were on the floor beside his desk. At approximately 1231 hours, MURDOCK re-entered the OFFICE opened the pink-colored greeting card envelope. MURDOCK then removed the U.S. Currency that the Investigative Agency placed inside the pink envelope greeting card. MURDOCK with his left hand, folded the U.S. Currency he removed from the pink envelope and placed it in his front left pant pocket.

12. At approximately 1232 hours, MURDOCK opened an Express Mail flat-rate envelope, which he had removed from the mail stream. MURDOCK then removed a white-colored, windowed envelope that appeared to contain currency. He then set the white windowed envelope on top of the two parcels sitting on the floor beside his desk. He then picked up the pink greeting card envelope (from the controlled test mailing) and placed the pink

envelope inside the Express flat-rate envelope he removed the white windowed envelope from. He then placed the Express Mail flat-rate envelope in his black shoulder bag located beneath his desk. Murdock then picked up what appeared to be currency removed from the white windowed envelope, examined, and counted it, then folded the currency and with his left hand, placed it in his front left pant pocket. Murdock then tore the white windowed envelope up and discarded it in the trash receptacle beneath his desk.

13. On March 24, 2022, MURDOCK, while in the OFFICE, opened a mail parcel that had been sitting on the floor beside his desk since he had removed it from the mail stream on February 24, 2022. Inside the parcel was packaging and black pouches like the packaging and black pouches used by Federated Mint. MURDOCK removed two of the black pouches, closed the parcel and resealed it. He opened both pouches, which appeared to have coins inside them, and then placed the pouches inside his desk drawer. MURDOCK then placed the resealed parcel on the floor beside his desk.

#### **CONCLUSION**

14. As a result of my personal participation in this investigation and based on this familiarity, and based on other

information that I have reviewed and determined to be reliable,  
I declare that the facts contained in this Affidavit show that:

(a) there is probable cause to believe that Bruce MURDOCK  
("TARGET SUBJECT"), has committed, is committing, and will  
continue to commit violations of:

(1) Title 18 United States Code, Section 1709, Theft  
of Mail by a Postal Service Employee (TARGET OFFENSE)

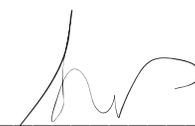
Respectfully submitted,



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Mark Munoz  
Special Agent  
U.S. Postal Service,  
Office of Inspector General

Sworn to via telephone on April \_15th\_, 2022, after submission  
by reliable electronic means. Fed. R. Crim. P. 4.1 and 41(d)  
(3).



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Amanda M. Knapp  
United States Magistrate Judge