

UNITED STATES DISTRICT COURT  
for the

Eastern District of California



**FILED**

**Jun 26, 2025**

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

United States of America  
v.  
ENDIS DANIEL GONZALEZ ORTEGA

Case No. 1:25-mj-00074-SAB

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 27, 2025 to May 29, 2025 in the county of Merced & Tulare, & elsewhere in the  
Eastern District of District, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. 371

Conspiracy Against the United States (bank robbery, 18 U.S.C. 2113(b))

This criminal complaint is based on these facts:

Affidavit of SA Mauro ("Adrian") Ramirez-Cazares attached hereto and incorporated by reference.

☒ Continued on the attached sheet.

*Complainant's signature*

SA Mauro ("Adrian") Ramirez-Cazares

*Printed name and title*

Sworn to me in accordance with Fed.R.Crim.P. 4.1.

Date: Jun 25, 2025

*Judge's signature*

City and state: Fresno, California

Hon. Stanley A. Boone, U.S. Magistrate Judge

*Printed name and title*

MICHELE BECKWITH  
Acting United States Attorney  
JEFFREY A. SPIVAK  
ARELIS M. CLEMENTE  
Assistant United States Attorneys  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ENDIS DANIEL GONZALEZ ORTEGA,  
  
Defendant.

CASE NO.

AFFIDAVIT IN SUPPORT OF CRIMINAL  
COMPLAINT

**FILED UNDER SEAL**

**I. INTRODUCTION**

I, Mauro A. Ramirez-Cazares, being first duly sworn under oath, depose and say:

1. This complaint seeks the issuance of an arrest warrant for **Endis Daniel GONZALEZ-ORTEGA** (hereinafter **GONZALEZ**) for violations of 18 U.S.C. § 371 – Conspiracy to Commit Bank Robbery.

2. Title 18, United States Code, Section 371 provides that “If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.”

3. Title 18, United States Code, Section 2113(b) provides that “[w]hoever takes and carries away, with intent to steal or purloin, any property or money or any other thing of value exceeding \$1,000 belonging to, or in the care, custody, control, management, or possession of any bank, credit

union, or any savings and loan association, shall be fined under this title or imprisoned not more than ten years, or both.”

4. As set forth below, beginning on a date unknown but not later than April 27, 2025 and continuing until a date unknown but not earlier than May 29, 2025, the defendants conspired to access ATMs belonging to banks and credit unions to steal money exceeding \$1,000 under the care and custody of the banks and credit unions.

## II. AGENT EXPERIENCE

5. I am a “Federal law enforcement officer” within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a federal law enforcement agent engaged in enforcing criminal laws and authorized to request a search warrant.

6. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since September 10, 2010. I received my initial training and instruction to become a Special Agent at the FBI Academy located in Quantico, Virginia where I received training concerning violations of the United States criminal statutes. After initial training, I was assigned to the San Juan Division of the FBI and worked from the Ponce, Puerto Rico office. There, I was assigned a variety of criminal cases which included White Collar Crime, Violent Crimes, Organized Crime, and Public Corruption. In 2014, I transferred to the Fresno Office, Sacramento Division of the FBI, where I continued to work in the criminal programs, in addition to investigating Civil Rights violations. I am currently assigned to the Sacramento Division, Joint Terrorism Task Force of the FBI where I am currently assigned to investigate Counter Terrorism and Cyber Intrusions.

7. I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation; from discussions with other agents of the FBI and other law enforcement officers; and from my review of records, reports, and surveillance videos relating to the investigation.

8. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another agent, law enforcement officer or witness who may have had either direct or hearsay knowledge of that statement and to whom I or others have spoken or whose reports I have read and reviewed. Such statements are among many statements made by others and are stated in

substance and in part unless otherwise indicated. Because this Affidavit is being submitted for the limited purpose of securing complaints for the named subjects, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe establish probable cause that evidence of the violations further described above have been committed.

### III. PROBABLE CAUSE

**A. In April and May 2025, A Subject, later identified as Defendant Joel Alejandro MORANTES Leal, Conducted a Series of ATM Jackpotting Attacks in the Eastern District of California**

9. Between April 27, 2025 and May 9, 2025, at least eight Automated Teller Machines (ATM) in the Eastern District of California were jackpotted by a group of individuals.

10. Jackpotting is the type of crime in which criminals exploit vulnerabilities in an ATM's software, hardware and physical structure, to cause it to dispense cash in unauthorized transactions.

11. The following is a discussion of six of those jackpotting attacks which highlights MORANTES's role in the attacks.

1. Incident 1 - April 28, 2025 - Merced School Employees Federal Credit Union (MSEFCU), Atwater, CA, Drive-Up ATM – Attempt only

12. On April 27th 2025 at approximately 22:36 hrs., bank surveillance video at Merced School Employees Federal Credit Union (MSEFCU), a Federal credit union whose deposits are insured by the National Credit Union Administration (NCUA), captured a black Toyota Prius (CA License Plate 9NUS045) parked directly in front of the ATM. The driver stayed in the vehicle and drove away a few minutes after. At approximately 23:51 hrs., the same vehicle drove up to the ATM, did not stop, and continued driving forward. As the vehicle drove through the ATM, the driver is observed using his/her cellular telephone and appeared to be taking photographs, video recording, or conducting a video call of the ATM. See Figure 1a below. Based on my training and experience and knowledge of the investigation, I believe that the individual driving the black Toyota Prius (CA License Plate 9NUS045) was casing and surveilling the scene for others.

Figure 1a – Photograph of unknown male photographing, video recording, or conducting a video call of the ATM.



13. Roughly 20 minutes later, at approximately 00:06 hrs. of April 28th, a grey Toyota Prius, with paper license plate number A7226652 (Washington State, photos below) drove up to the ATM. A subject (believed to be **MORANTES**, as discussed further below) was observed getting out of the vehicle and opening the ATM front latch assembly. See Figure 1b below.

Figure 1b – Photographs of subject (**MORANTES**) accessing the ATM.



14. Per interview with the credit union's IT Manager, the lock was not forced, which suggests that the subjects used a key to unlock the ATM.

15. The subject was wearing a dark colored hooded sweatshirt with large writing on the left sleeve, a blue baseball cap with the "HH" logo of men's clothing company, Helly Hanson, and a blue surgical mask with a small piece of horizontal metal across the top of the mask. The subject then closed the latch to the ATM, got back inside the vehicle, and drove off.

16. Shortly after, the grey Toyota Prius returned. Surveillance captured the subject **MORANTES**) actively manipulating the ATM's computer via a wireless keyboard and using his cellular telephone in what appears to be a video call.

17. After several minutes of manipulating the ATM's computer, the male (**MORANTES**) was unable to cause the machine to dispense the money. The male is observed opening the ATM latch one more time and then the grey Toyota Prius drove away around 00:52 hrs without having dispensed any money from the ATM. Credit Union staff believes the unsuccessful attempt may have been due to operating system issues they have been having with this ATM machine.

2. Incident 2 - April 28, 2025 - Merced School Employees Federal Credit Union (MSEFCU), 1021 Olivewood Drive, Merced, CA, Drive-Up ATM – Attempt only

18. On April 28, 2025, surveillance footage captured the same black Toyota Prius (CA License Plate 9NUS045) driving slowly but not stopping in front of the ATM at Merced School Employees Federal Credit Union (MSEFCU), 1021 Olivewood Drive, Merced, CA. Shortly after, the grey Toyota Prius (WA State Paper Plates A7226652) drove up to the ATM.

19. A subject who appears to match the subject who manipulated the ATM in Incident 1 in Atwater (**MORANTES**), wearing a similar dark colored hooded sweatshirt and a baseball cap, attempted to open the ATM's front latch. The subject was unable to open it, got into the grey Toyota Prius, and drove away. The vehicle returned shortly after to try again. They were unsuccessful. They depart without having dispensed any money from the ATM. In one of the last images, the subject (**MORANTES**) is observed taking off his mask.



Figure 2 – Photographs of subject (**MORANTES**) after accessing the ATM in Merced.



3. Incident 3 - April 28, 2025 - Merced School Employees Federal Credit Union (MSEFCU), 1890 S Mercey Springs Rd., Los Banos, Drive-Up ATM – Loss \$94,800

20. On April 28, 2025, at approximately 0206 hrs., surveillance captured the grey Toyota prius (CA License Plate 9NUS045) arriving at the Merced School Employees Federal Credit Union (MSEFCU), 1890 S Mercey Springs Rd., in Los Banos, California.

21. A subject was wearing a similar dark colored hooded sweatshirt with large writing on the left sleeve, and a blue surgical mask with a small piece of horizontal metal across the top of the mask. The subject appeared to match the physical description of the subject in Incidents 1 and 2. The subject (**MORANTES**) attempted to open the ATM's front latch. After a few minutes the subject entered the vehicle and drove away.

22. The grey Toyota Prius returned to the ATM roughly one hour later. The same subject (**MORANTES**) is observed on surveillance manipulating his cell phone and a wireless keyboard in a manner consistent with the ATM incident in Atwater. The subject was then observed in what appear to be a video call and pointed his cell phone towards the ATM's screen.

23. The subject was successful in breaching the ATM software and caused it to dispense the money, later determined by the financial institution to be approximately \$94,800. See Figure 3 below.

Figure 3 – Three photographs of subject (**MORANTES**) accessing the ATM in Los Banos and obtaining cash.

*Subject (**MORANTES**) opening the ATM*



*Subject (**MORANTES**) and another individual retrieving the cash*



*Subject (**MORANTES**) without a mask*





24. After all the money was depleted from the ATM, the subject opened the front latch of the ATM, appeared to retrieve something from inside, closed the latch, returned to the car, and drove away.

25. Later examination by credit union personnel would reveal that the lock was not forced, indicating that the subject accessed the ATM with a key, in a manner consistent with the Atwater incident above.

4. Incident 4 - May 7, 2025 - Bank of the Sierra, 2515 S. Mooney Blvd. Visalia CA  
Drive-Up ATM – Attempt only

26. On May 7, 2025, surveillance at Bank of the Sierra, a Federal Deposit Insurance Corporation (FDIC)-insured financial institution (F22597), 2515 S. Mooney Blvd. Visalia, CA captured a silver color Honda Odyssey drive up to the Drive-Up ATM at approximately 2308 hrs.

27. Surveillance showed a subject, who appears to match the physical description of the subject in Incidents 1, 2 and 3 (**MORANTES**), open the front latch of the ATM in the same manner as in the previous incidents. The subject is wearing a similar dark colored hooded sweatshirt, a similar blue baseball cap with the “HH” logo of men’s clothing company, Helly Hanson, and a similar blue surgical mask with a small piece of horizontal metal across the top of the mask. The subject pulled out the tray carrying the ATM’s computer and manipulated the computer with a handheld tool. The subject closed the ATM and drove away.

28. At approximately 02:18 hrs., the silver Honda Odyssey was observed on surveillance footage returning to the ATM. Surveillance captured a subject (**MORANTES**) opening the ATM front door and latch, manipulating the ATM, and then leaving. See Figure 4.

29. Pursuant to police report by Visalia Police Department, the subject(s) stole the computer’s hard drive.

Figure 4 – Photographs of Honda Odyssey and Subject (**MORANTES**) accessing the ATM in Visalia.



5. Incident 5 - May 8, 2025 - Bank of the Sierra, 246 E. Tulare Ave., Tulare CA  
Drive-Up ATM – Attempt only

30. On May 8, 2025, surveillance at Bank of the Sierra, 246 E. Tulare Ave., Tulare CA showed a silver color Honda Odyssey driving up to the Drive-Up ATM at approximately 00:54 hrs.

31. Surveillance captured a subject, who appeared to match the physical description of the subject in Incidents 1 through 4 (**MORANTES**), open the front latch of the ATM in the same manner as

1 in the previous incidents. The subject was wearing a similar dark colored hooded sweatshirt, a similar  
2 blue baseball cap with the “HH” logo of men’s clothing company, Helly Hanson, and a similar surgical  
3 mask with a small piece of horizontal metal across the top of the mask.

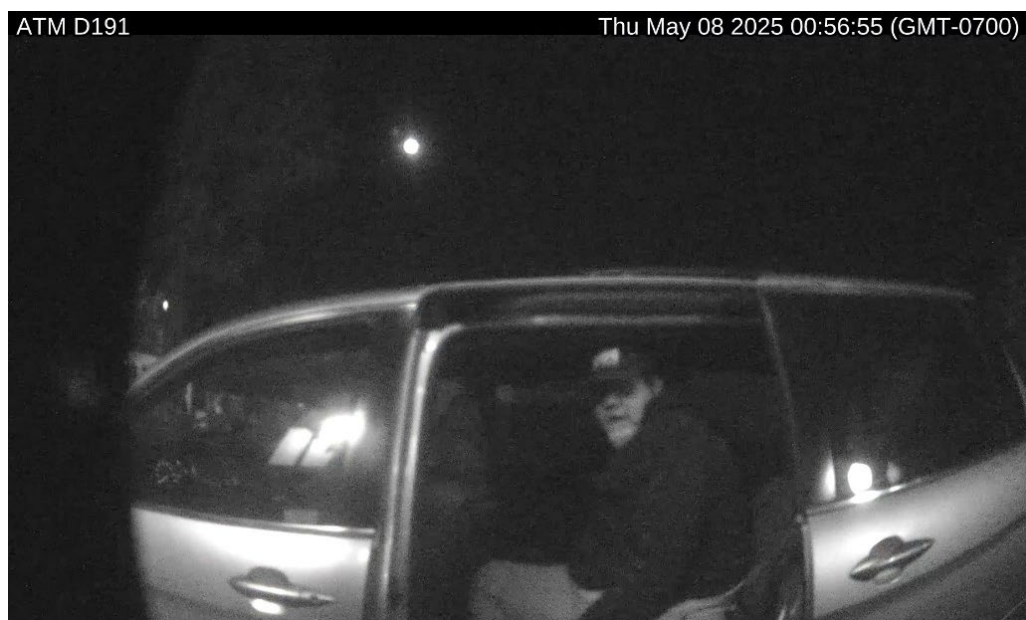
4 32. The subject (**MORANTES**) opened the front door and latch of the ATM using a hand-  
5 held tool, then closed the latch and door, and returned to the vehicle. Shortly after, the subject re-opened  
6 the ATM, appeared to be working with the hardware, and closed the ATM. The Honda Odyssey then  
7 drove away. A few minutes later the Honda Odyssey returned, the subject (**MORANTES**) retrieved  
8 what appears to be the ATM’s hard drive, and then drove away. See Figure 5.

9 Figure 5 – Photographs of Honda Odyssey and Subject (**MORANTES**) accessing the ATM in Tulare.

10 Overview of Honda Odyssey arriving at ATM



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18 Subject (**MORANTES**) without mask.



Subject (**MORANTES**) manipulating ATM.



Incident 6 - May 8, 2025 - Bank of the Sierra, 1430 E. Prosperity Ave., Tulare CA Drive-Up

ATM – Attempt only

33. On May 8, 2025, surveillance at Bank of the Sierra, 1430 E. Prosperity Ave, Tulare CA showed a silver color Honda Odyssey driving up to the Drive-Up ATM at approximately 01:25 hrs.

34. A subject got out of the vehicle and began working on the ATM. The subject opened and closed the ATM multiple times, and appeared to retrieve something from the machine. An unknown man was then observed riding a bicycle near the Silver Honda Odyssey, which may have caused the subject(s) to stop their attempt on the ATM. Shortly after the man on the bicycle leaves, the Honda Odyssey drives away.

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**B. License Plate Reader (LPR) analysis showed that the grey Prius and the silver Honda Odyssey had related travel patterns suggesting they were tied to one another**

35. Agents conducted a search of vehicles using the Vigilant Vehicle Manager system<sup>1</sup> to search License Plate Readers (LPR) for known hits on the black Toyota Prius (CA License Plate 9NUS045), seen casing the credit union in Incident 1. Agents found license plate reader results in Los Banos and Merced during the early morning hours of April 28, 2025. The analysis generate three hits.

36. Using this data, Agents used the same system and requested “nearby vehicles” to this vehicle on the same date and times. This request provided vehicles that passed the LPRs just prior to the known vehicle and just after. Agents ran reports for three LPR hits on the black Toyota Prius and then looked for matching vehicles that would show up on all three reports. Agents found that a grey 2004 Toyota Prius bearing California License plate 9SNY253 (registered to an Andres Francisco Corzo Castillo at 61 Preda St., San Leandro, CA) that showed up on all three occasions with the black Toyota Prius (9NUS045). Based on the locations of the LPRs and the times the vehicles pass through the LPRs, Agents concluded these vehicles must be traveling together. Furthermore, the grey Toyota Prius observed in surveillance for the Atwater, Merced and Los Banos ATM incidents (Incidents 1 through 3) was consistent in color and description to the grey Toyota Prius captured on the LPRs. Thus, your affiant concluded the grey Toyota Prius (**9SNY253**) is in fact the vehicle the subject (**MORANTES**) travelled in the jackpotting incidents (1-3), and used a WA paper plate number **A7226652**, to conceal its real license plates.

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<sup>1</sup> The Vigilant Vehicle Manager system, developed by Motorola Solutions, is a license plate recognition (LPR) software designed to assist law enforcement and security agencies in tracking and analyzing vehicle data.



37. On May 30, 2025, TFO Pat Mares performed additional LPR analysis on the grey Toyota Prius (**9SNY253**) and was able to identify the silver Honda Odyssey (2007 Honda Odyssey, owned by a Juan Luis Aguilar (**5XPA999**)) frequently traveled with the grey Toyota Prius during the May 2025 time frame. See chart below:

DATE	Grey Toyota Prius 9SNY253		Silver Honda Odyssey 5XPA999	
May 2, 2025	Hwy 50 LPR – South Lake Tahoe, CA	2053 hours	Hwy 50 LPR- South Lake Tahoe, CA	2144 hours
May 2, 2025	Hwy 50 LPR – Stateline, NV	2107 hours	Hwy 50 LPR - Stateline, NV	2200 hours
May 2, 2025	Hwy 50 LPR – Carson City, NV	2119 hours	Hwy 50 LPR – Carson City, NV	2217 hours
May 8, 2025	Rolling LPR – 3967 Chester Lane, Bakersfield, CA	1527 hours	Rolling LPR – 3967 Chester Lane, Bakersfield, CA	1528 hours
May 10, 2025	Hwy 60 LPR – Wickenburg Way at Los Altos Wickenburg, AZ	1405 hours	Hwy 60 LPR – Wickenburg Way at Los Altos Wickenburg, AZ	1412 hours
May 10, 2025	Hwy 60 LPR – Wickenburg Way at El Recreo, Wickenburg AZ	1408 hours	Hwy 60 LPR – Wickenburg Way at El Recreo, Wickenburg AZ	1415 hours
May 11, 2025	Hwy 60 LPR – Wickenburg Way at El Recreo, Wickenburg AZ	1708 hours	Hwy 60 LPR – Wickenburg Way at El Recreo, Wickenburg AZ	1659 hours
May 11, 2025	Paradise Hills LPR – Henderson, NV	2027 hours	Paradise Hills LPR – Henderson, NV	2024 hours
May 11, 2025	NB I-15 LPR – Las Vegas NV	2346 hours	NB I-15 LPR – Las Vegas NV	2334 hours

38. The common travel patterns between the grey Prius and the silver Honda Odyssey help establish that the subject (**MORANTES**) seen conducting the Jackpotting attacks in Incidents 1, 2, and 3 driving in the grey Prius is the same subject (**MORANTES**) seen conducting the Jackpotting attacks in Incidents 4, 5 and 6 driving in the silver Honda Odyssey.

**C. Investigation Revealed that the Subject(s) from Incidents 1 through 6 in the Eastern District of California Likely Conducted Other Jackpotting Attacks in the Western United States including in Oregon and Washington.**

39. Agents believe this group may be responsible for as many as nine other jackpotting incidents outside of California. In coordination with state and federal agencies, affiant located and reviewed surveillance footage and evidence from other incidents. Affiant determined that the tactics and techniques used in the Eastern District of California incidents were similar to the tactics and techniques used in the other Western States, including Oregon and Washington.

40. Analysis reveals that the group specifically targeted specific ATM models by software, hardware and physical security vulnerabilities. Subjects are targeting ATMs make and models Diebold DN Series models and NCR 6688 models; which are manufactured and sold to banks with generic key access. This physical security vulnerability allowed **MORANTES** to make use of a generic key, readily available on-line, to access the ATM computer.

41. The actions of the subject were similar in the California incidents as in the Oregon and Washington incidents. Upon breaching the ATM, the subject (**MORANTES**) removed the hard drive, and appeared to take it off-site to upload malware on to it, and then returned to the ATM to reconnect it to the ATM's computer.

42. Forensic analysis of the California incidents as in the Oregon and Washington incidents revealed that the subject (**MORANTES**) exploited similar software vulnerabilities in the Activate Enterprise security software<sup>2</sup> to bypass security measures, launch the malicious software and cause the machine to dispense all the money within.

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<sup>2</sup> Activate Enterprise (AE) software acts as the bridge between the Windows-based operating system and the ATM hardware, ensuring smooth communication between software and physical components. Running on Windows Internet of Things, AE manages transactions, security protocols, and user interactions while interfacing with the ATM's card reader, cash dispenser, touchscreen, and sensors. It enables contactless payments, cardless banking, and cash recycling, ensuring modern functionality. AE also integrates with network processors to authenticate transactions and maintain compliance, making ATM operations efficient and secure.

43. In most of the surveillance footage of the California, as well as Oregon and Washington incidents, the subject (**MORANTES**) was observed attempting to open the ATM, remove the hard drive, and launch the malicious code using a wireless keyboard.

**D. In June 2025, Agents Identified JOEL ALEJANDRO MORANTES LEAL as the Subject seen committing the Jackpotting attacks.**

44. In June 2025, FBI SA Gina M. Hofmann performed a review of databases and open sources to identify the main subject.

45. The below image was obtained from bank surveillance footage of an attempted ATM Jackpotting incident that occurred on April 13, 2025, at OCU Credit Union, a Federal credit union whose deposits are insured by the NCUA, 510 Wallace Rd. NW Salem, OR. Pursuant to an incident report by Salem PD, subjects arrived in a Toyota Rav4 using Washington State paper plates **A7226652**<sup>3</sup>, the same paper plate type and number displayed by the grey Toyota Prius in Incidents 1, 2 and 3 in California (discussed previously). In the April 13 Oregon incident, a subject matching the description of **MORANTES**, is observed on surveillance accessing the ATM and removing the hard drive (in a manner consistent with the incidents above). **MORANTES** also took his mask off during the incident. In surveillance video agents were able to see subject had a unique tattoo in his arm. Surveillance video from the ATM provided a clear shot of subject's face matching that of the incidents above. Please see photos below:

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<sup>3</sup> The same Toyota Rav4 (WA State paper plates **A7226652**) has been associated with several ATM jackpotting incidents from April 4 to 15 in the states of Washington and Oregon.

1 Subject (**MORANTES**) manipulating the ATM



10 Subject (**MORANTES**) without a mask



Subject (**MORANTES**) visible tattoos in the forearm



Toyota Rav4 (WA State paper plates **A7226652**)



46. On/about June 11, 2025, FBI agents made a request to U.S. Custom Border Protection (CBP) to run a query of its databases for facial matches to the photograph of the subject obtained from the surveillance footage of the April 13, 2025, incident in Salem OR. On June 12, 2025, U.S. CBP provided the FBI with a possible match of the individual depicted in the Salem, OR incident of April 13, 2025. CBP identified that person as Joel Alejandro MORANTES Leal, date of birth November 23, 1999, Alien Registration Number A246727977, Place of Birth Venezuela. Public records show him to be brown hair, brown eyes, 6 ft, and 220 pounds. These metrics all match the subject in the Jackpotting attacks.

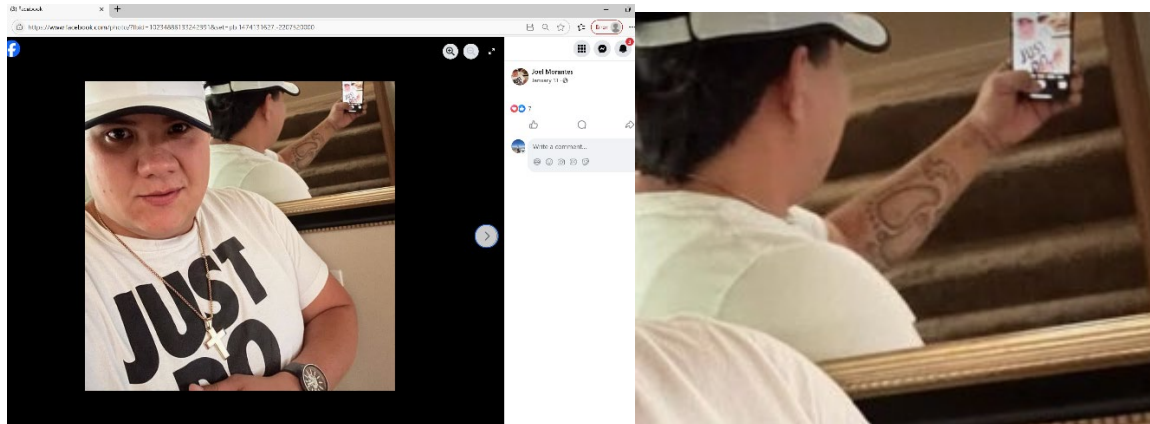
47. CBP provided a recent booking photo of **MORANTES** taken on/about June 10, 2025. Based on my review of hours of surveillance video of the Jackpotting attacks, social media evidence



(discussed below), I believe the **MORANTES** is the subject who conducted the Jackpotting attacks under investigation.



48. FBI reviewed Facebook url: <https://www.facebook.com/joel.morantes>, display name “Joel Morantes” Facebook ID: 1474131627. On January 13, 2025, the following image was posted on **MORANTES’** Facebook page showing a tattoo on his right forearm that appeared to be an image of a baby’s footprint:



49. **MORANTES’** Facebook photo appears to be the same person depicted in the CBP booking photo and on surveillance in the Jackpotting attacks.

50. The forearm tattoo identified on **MORANTES**' Facebook page matches the baby's footprint tattoo of the male subject involved in April 13, 2025 and April 15, 2025 ATM jackpotting incidents in Oregon. See pictures below:

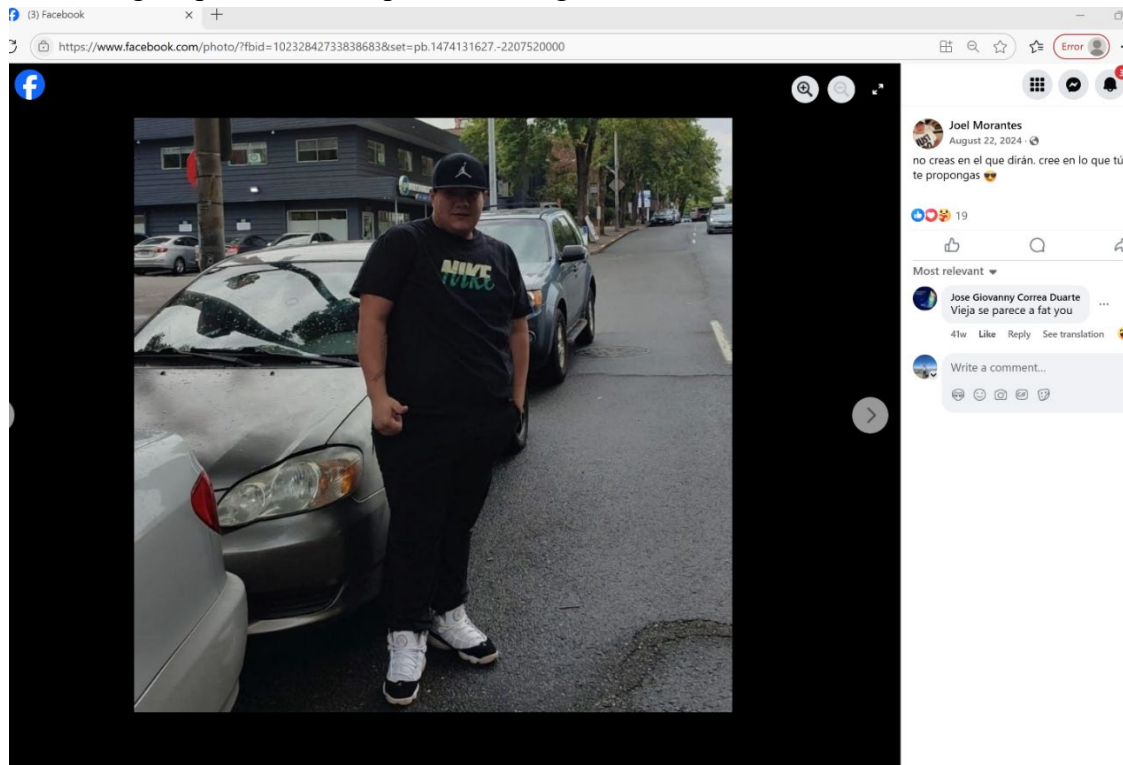
a) Photo of Subject's Arm Captured by Surveillance Video on April 13, 2025 during ATM jackpotting incident at 510 Wallace Rd. NW Salem, OR displaying baby's footprint tattoo on right forearm:



b) Photo of Subject's Arm Captured by Surveillance Video on April 15, 2025 during ATM jackpotting incident at 1980 NW 9th Street Corvallis, OR displaying baby's footprint tattoo on right forearm:

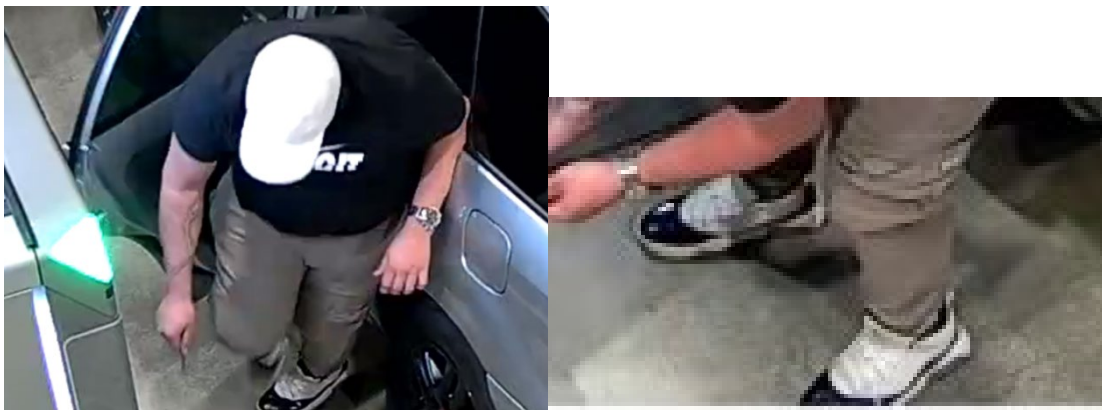


51. FBI also identified on **MORANTES'** Facebook page an image of him wearing a pair of black and white high top tennis shoes posted on August 22, 2024.



52. The black and white high top tennis shoes matched the footwear worn by the subject during the April 2025 ATM Jackpotting incidents in Washington:

a) Photo of Subject's Shoes (and right forearm tattoo) Captured by Surveillance Video on April 12, 2025 during ATM jackpotting incident at 721 College Street SE Lacey, WA, at First Citizens Bank:



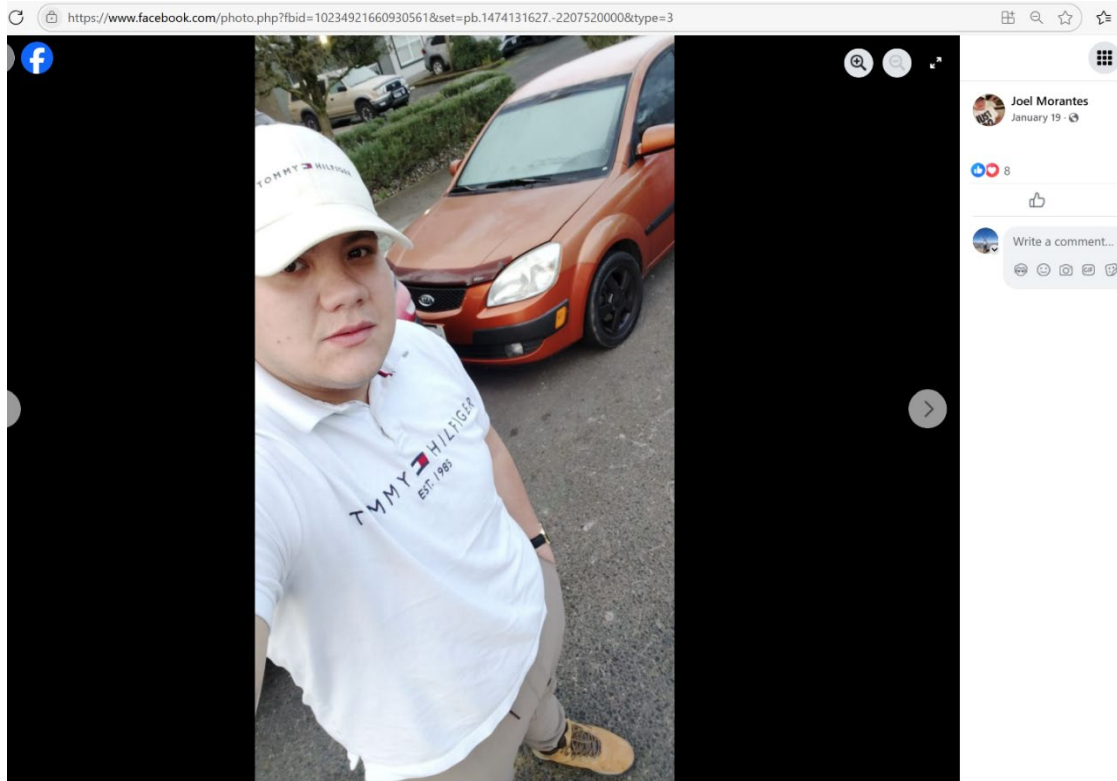
b) Photo of Subject's Shoes (and right forearm tattoo) Captured by Surveillance Video on April 13, 2025 during ATM jackpotting incident at 510 Wallace Rd. NW Salem, OR at OSU Credit Union.



c) Photo of Subject's Shoes Captured by Surveillance Video on May 8, 2025 during ATM jackpotting incident at 1430 E. Prosperity Ave, Tulare CA 93274 – Bank of the Sierra (Incident 6, discussed above):



53. Also identified on **MORANTES'** Facebook page was an image of him wearing a pair of tan and black hiking boots posted on January 19, 2025. See below:



54. The tan and black hiking boots matched the same kind of footwear worn by the subject during an April 15, 2025 during ATM jackpotting incident at 1980 NW 9th Street Corvallis, OR – OSU Credit Union:





**E. The Jackpotting Conspiracy Moves from California to Colorado**

55. On June 2, 2025, I requested an updated LPR report for the silver Honda Odyssey, (Ca. Lic. Plate **5XPA999**). Results show the Honda Odyssey was spotted in Arizona on May 9, 2025, at approximately 22:19 hrs, roughly 2 days after the attempted jackpotting attack in Tulare (discussed above). Subsequently in the next few days, it traveled through Nevada, Utah, and arriving to Colorado on May 19, 2025. As of the date of the request, the Honda Odyssey was still in Colorado. See chart below:

License Plate	Date	Time	LPR location
5XPA999	9-May-25	10:19:02 PM PDT	Lake Havasu City PD (AZ)
5XPA999	10-May-25	11:42:26 PM PDT	Maricopa AZ PD
5XPA999	10-May-25	10:48:30 PM PDT	City of Peoria AZ PD
5XPA999	10-May-25	10:05:14 PM PDT	Glendale AZ Purchase Arrowhead
5XPA999	10-May-25	9:06:37 PM PDT	Goodyear AZ PD
5XPA999	10-May-25	6:11:21 PM PDT	AZ - Tolleson PD
5XPA999	10-May-25	12:05:38 PM PDT	La Paz County AZ SO
5XPA999	10-May-25	1:52:29 AM PDT	Parker AZ PD
5XPA999	10-May-25	1:31:16 AM PDT	La Paz County AZ SO
5XPA999	10-May-25	1:08:38 AM PDT	Lake Havasu City PD (AZ)
5XPA999	11-May-25	11:18:08 PM PDT	Las Vegas Metro NV PD
5XPA999	11-May-25	3:34:20 PM PDT	AZ - Gilbert PD
5XPA999	11-May-25	4:15:23 AM PDT	AZ - Tolleson PD
5XPA999	12-May-25	4:18:09 PM PDT	Provo UT PD
5XPA999	12-May-25	10:34:48 AM PDT	Cedar City PD UT
5XPA999	13-May-25	10:48:57 PM PDT	Salem UT PD
5XPA999	13-May-25	4:04:47 PM PDT	Orem UT PD
5XPA999	13-May-25	2:01:17 PM PDT	Brigham Young University (UT)
5XPA999	13-May-25	11:38:05 AM PDT	Provo UT PD
5XPA999	13-May-25	11:27:59 AM PDT	Springville PD (UT)
5XPA999	14-May-25	2:13:39 AM PDT	West Valley City UT PD
5XPA999	15-May-25	1:01:02 AM PDT	West Jordan UT PD
5XPA999	19-May-25	9:57:12 AM PDT	Arapahoe CO SO
5XPA999	19-May-25	7:08:59 AM PDT	Glenwood Springs CO PD
5XPA999	21-May-25	9:18:37 PM PDT	Canon City CO PD
5XPA999	22-May-25	11:57:03 PM PDT	Aurora CO PD
5XPA999	22-May-25	2:42:27 AM PDT	Castle Rock CO PD
5XPA999	23-May-25	1:44:45 PM PDT	Northglenn CO PD
5XPA999	23-May-25	12:47:52 PM PDT	Arapahoe CO SO
5XPA999	23-May-25	11:24:28 AM PDT	Aurora CO PD

5XPA999	23-May-25	11:15:48 AM PDT	Arapahoe CO SO
5XPA999	24-May-25	8:13:37 AM PDT	Thornton CO PD
5XPA999	2-Jun-25	6:13:10 AM PDT	Northglenn CO PD
5XPA999	2-Jun-25	6:13:08 AM PDT	Northglenn CO PD

56. On May 21, 2025, the silver Honda Odyssey (CA license plate **5XPA999**) was observed on a LPR camera located near the location of Power Credit Union (a State-chartered credit union the accounts of which are insured by the National Credit Union Administration Board), located at 3165 East U.S. Highway 50, in Cañon City, Colorado. Eight minutes prior, the same LPR camera captured a silver Mazda (UT license plate **8EAD0**).

57. The Larimer County Sheriff's Office in Colorado conducted an LPR analysis for the silver Honda Odyssey (CA license plate **5XPA999**) to identify other vehicle LPR hits matching location and time. Investigators found the silver Mazda (UT license plate **8EAD0**) was traveling in close proximity of the Honda Odyssey (CA license plate **5XPA999**) in Cañon City and Aurora, Colorado.

58. Larimer County Sheriff Investigators in Colorado were **altered** to several other jackpotting incidents in Colorado and Nebraska in late May 2025. Through their investigation they concluded the following incidents were related and attributed to **MORANTES** and a subject later identified as **ENDIS DANIEL GONZALEZ-ORTEGA**, herein after **GONZALEZ**, as discussed below.

a) On May 23, 2025, the Cañon City Police Department, in Colorado, was advised of a jackpotting incident targeting the Power Credit Union (PCU) located at 3165 East U.S. Highway 50, in Cañon City, Colorado. In that incident, the subject stole approximately \$68,000 from an ATM. In surveillance footage, the subject is observed opening the ATM and tampering with the machine, in a manner consistent with the jackpotting incidents cited above. The suspect vehicle was identified as the silver Honda Odyssey (Ca. license plate **5XPA999**). Cañon City PD obtained a photograph of the subject driving the silver Honda Odyssey (CA license plate **5XPA999**) which was later identified as **MORANTES**.

b) May 27, 2025, at 2120 hrs. in Greeley, Colorado. Successful jackpotting of Points West Community Bank (PWCB) (a FDIC-insured financial institution) Drive-Up ATM, located at 6801 20<sup>th</sup> Street, in Greeley, Colorado. In surveillance footage the silver Mazda (UT license Plate **8EAD0**) is observed arriving to the ATM. Also, in surveillance footage **MORANTES** is observed driving up to the ATM in the silver Mazda (UT license Plate **8EAD0**), getting out of the driver's seat and begins to tamper with the ATM; causing it to dispense \$10,000.

*MORANTES manipulating the PWCB ATM at Greeley CO.*



c) May 28, 2025, at 0104 hrs. in Fort Collins, Colorado. This was an attempted jackpotting of the PWCB Drive-Up ATM, located at 3227 South Timberline Road, in Fort Collins Colorado. In surveillance footage the silver Mazda (UT license Plate **8EAD0**) is observed arriving to the ATM and subsequently driving away to park. **MORANTES** is then observed arriving to the Drive-Up ATM on foot. However, in attempting to open the ATM, **MORANTES** set off an audible alarm causing him to leave.

d) On May 28, 2025, at 0137 hrs. in Wellington, Colorado. The Larimer County Sheriff's Office, Colorado, responded to a jackpotting incident targeting the PWCB, located at 8100 6<sup>th</sup> Street., in Wellington, Colorado. In surveillance video a silver Mazda drivers up to the ATM. A subject is then observed exiting the vehicle from the driver's seat and begins to tamper with the

1 ATM. At approximately 0141 hrs. the subject was able to retrieve approximately \$8,000 and  
2 drove away. Investigators later determined the vehicle was the silver Mazda Sedan (UT license  
3 plate **8EAD0**), and the subject observed in surveillance footage was **MORANTES**. See Images  
4 below:

5 *Silver Mazda Sedan (Utah License Plate 8EAD0)*



13  
14 *MORANTES manipulating ATM at PWCM, Wellington CO.*



23  
24 e) May 29, 2025, at 0109 hrs., in Sidney, Nebraska. Successful jackpotting of PWCB Drive-  
25 Up ATM located 809 Illinois Street., in Sidney, Nebraska. In surveillance footage the silver  
26 Mazda (UT license Plate **8EAD0**) is observed driving up to ATM. The vehicle then leaves to  
27 park at an unknown location and both subjects are observed arriving on foot to the ATM.  
28

Subsequently **MORANTES**, and **GONZALEZ** are observed arriving to the ATM and conducting the jackpotting, causing the machine to dispense \$32,000.

*GONZALEZ (driver) and MORANTES (passenger) arriving to ATM*



*GOZALEZ and MORANTES walking up to the ATM*



*GONZALEZ at the ATM.*





59. The manner in which **MORANTES** and **GONZALEZ** are positioned in the vehicle in Sidney, Nebraska (**GONZALEZ** in drivers seat looking back at **MORANTES** in rear seat) bears striking resemblance to the manner in which **MORANTES** conducted the \$94,800 jackpotting attack in Merced County (Incident 3, above).

**F. On May 29, 2025, Larimer County (Colorado) Sheriff Office Arrested MORANTES and ENDIS DANIEL GONZALEZ-ORTEGA.**

60. Larimer County Sheriff's Investigators proceeded to set surveillance to locate the silver Mazda (UT license Plate **8EAD0**). On May 29, 2025, a small task force comprised of local and federal law enforcement agents, located the vehicle parked at a La Quinta Inn and Suites located at 1500 South Abilene Street, in Aurora Colorado.

61. At approximately 1557 hrs., a female, later identified as ISABELA DE LOS ANGELES SULBARAN, (hereinafter SULBARAN) was observed accessing the silver Mazda (UT license Plate **8EAD0**). Both SULBARAN and **GONZALEZ** were observed arriving to the Los Del Arte Apartments, located at 142 S. Joliet Circle, in Aurora, Colorado.

62. The surveillance team remained on point and learned that both SULBARAN and **GONZALEZ** were together inside an apartment, which is used as an in-home tattoo parlor. Shortly after SULBARAN was observed leaving the apartment. She proceeded to get into the silver Mazda (UT license Plate **8EAD0**) and drive away. Part of the surveillance team proceeded to follow her, while the other remained at the apartment waiting for **GONZALEZ**.

63. The surveillance team following SULBARAN conducted a traffic stop of the vehicle. SULBARAN was interviewed by Larimer County Sheriff's Office investigators. SULBARAN identified **GONZALEZ**, and told them he had stayed behind at the apartment with the "tatuador" (the tattoo guy). She also said **MORANTES** was at the La Quinta Inn and Suites, possibly in apartment 113 or 114 (SULBARAN had in her possession a key to the room). SULBARAN also told investigators she had just arrived to Colorado from Utah, driving a grey Toyota Corolla (UT license plate **T844JW**).

64. During the contact with SULBARAN, investigators saw, in plain view, a wireless keyboard, much like the one used in the ATM burglary in Sidney NE. Consequently, investigators seized the vehicle.

65. Surveillance team at the apartments were able to confirm that **GONZALEZ** left, getting a ride from an unknown individual at the apartment. The Honda sedan was left at the apartments.

66. At approximately 2140 hours the surveillance team observed **MORANTES** and **GONZALEZ** exiting the hotel. They appeared to be rushing in loading their belongings into a grey Toyota Corolla (UT license plate **T844JW**) and drove off. Shortly after, the surveillance team conducted a traffic stop of the vehicle and placed both **MORANTES** and **GONZALEZ** under arrest. The vehicle was also seized by investigators. Investigators also seized from **GONZALEZ** a dark grey Samsung Phone (IMEI: 357877121638845)

67. Upon law enforcement contact, **MORANTES** provided a false name. However, he later identified himself in true name. **GONZALEZ** provided his identity to law enforcement agents. Larimer County Sheriff's Investigators concluded that **GONZALEZ** the other subject seen on surveillance footage from the ATM burglary in Sidney, Nebraska.

68. On June 4, 2025, Larimer County Sheriff's Investigators interviewed **GONZALEZ** at the Immigration and Customs Enforcement detention facility located at 3130 Oakland Street, in Aurora Colorado. Investigators read the Miranda Advisement in Spanish, which is his primary language, and he voluntarily waived his Miranda rights.

69. **GONZALEZ** was showed a photograph from surveillance video of the Sidney Nebraska jackpotting incident. **GONZALEZ** confirmed this was his vehicle and that he was driving it. He identified the person sitting behind him as **MORANTES**. **GONZALEZ** also admitted he was driving the vehicle while **MORANTES** was "removing the money."

70. Investigators questioned **GONZALEZ** about the techniques, tactics and procedures used in carrying out the jackpottings. Initially **GONZALEZ** was evasive and denied knowing what **MORANTES** was doing. As the interviewed progressed, **GONZALEZ**'s tone changed. **GONZALEZ** said to investigators "I want to get out of here, I honestly know where the money is and I can turn it over to you right now if you take me. The money is in the car . . . in the Toyota Corolla, in the trunk of the vehicle."

71. On June 10, 2025, investigators conducted a search of the Corolla and the Mazda pursuant to a state search warrant. Inside the trunk of the Corolla, investigators located a grey duffel

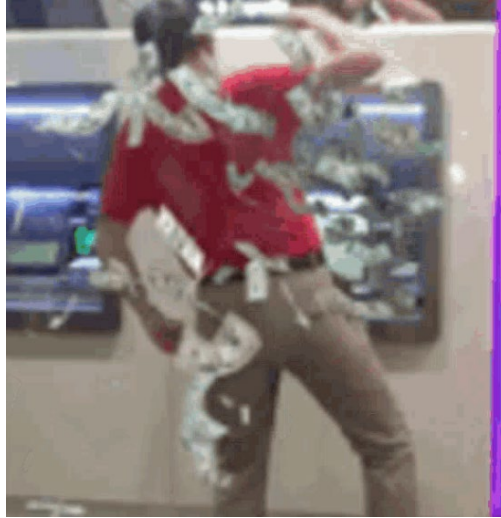
1 bag. Inside the bag, investigators located **GONZALEZ**'s identification, a rubber banded bundle of  
2 U.S. Currency, and a metal key for an unknown lock. Investigators also located a black laundry bag in  
3 the trunk. Inside the trunk, investigators located clothing and numerous rubber-banded bindles of U.S.  
4 currency.

5 72. Inside the Mazda, investigators located a laptop computer, two computer keyboards, and  
6 a box for Apple earbuds. In several of the surveillance videos from the jackpotting incidents in  
7 Colorado, **MORANTES** is seen wearing what appears to be a white Apple earbud.

8 73. On June 25, 2025, investigators conducted an initial review of **GONZALEZ**'s cellular  
9 telephone belonging a state search warrant. Investigators found the following:

10 a) One video taken the night of May 28, 2025 near the PWCB in Wellington, CO, according  
11 to investigators familiar with the investigation and the area. The video is of the PWCB and the  
12 ATM, which according to investigators' training and experience was consistent with someone  
13 casing and surveilling the scene.

14 b) Several WhatsApp application chat groups discussing the planning, operation, and  
15 execution of jackpotting incidents. In one of the group chats, with at least 13 members, the group  
16 discusses the tactics, techniques and procedures to carry out jackpotting hits at the Colorado and  
17 Nebraska locations. Furthermore, there is an exchange of Google Map locations of the banks,  
18 photographs of the targeted ATMs, banks, locations, and a discussion, led by **MORANTES**,  
19 about the distribution of proceeds. **GONZALEZ** is an active participant in this and at least two  
20 more group chats, in which he discusses tactics, techniques and procedures to carry out  
21 jackpotting hits. In one example, on/about the date of the Cañon City jackpotting attack, an  
22 unidentified individual sent **GONZALEZ** gif file. Investigators found a similar gif on the  
23 internet which depicts a male standing in front of the ATM with money flowing out of it (see  
24 below):  
25  
26  
27  
28



74. Hotel staff were interviewed about the occupants in the hotel. Staff indicated the room numbers were 112 and 110. They were rented by “JUAN OSPINO BELENO” with a stay from May 29 to May 30, 2025 and paid for in cash. The individuals listed a Toyota Corolla and a Mazda on the hotel registration form. Surveillance video from check-in shows **MORANTES** (standing with **GONZALEZ**) pulling a large wad of cash from his pocket:




75. Based on the foregoing, I believe that one of the unidentified subjects who committed the Jackpottling incidents in the Eastern District of California is Endis Daniel **GONZALEZ** Ortega.

76. Further, I believe there is probable cause to believe that Endis Daniel **GONZALEZ**-Ortega conspired with **MORANTES** and others to steal more than \$1,000 in money from banks and credit unions, a violation of 18 U.S.C. § 2113(b) (Bank Larceny); all in violation of 18 U.S.C. § 371 –


1 Conspiracy to Commit Bank Robbery. The conspiracy began at a date unknown but not later than  
2 April 27, 2025, members of the conspiracy committed act in furtherance of the conspiracy in Eastern  
3 District of California, and the conspiracy continued until a date unknown but not earlier than May 29,  
4 2025.

5 77. I respectfully request the Court issue an arrest warrant for Endis Daniel **GONZALEZ**  
6 Ortega.

7 I declare under penalty of perjury that the facts contained herein are true and correct to the best  
8 of my knowledge and belief.

9   
10 Mauro A. Ramirez-Cazares, Special Agent  
11 Federal Bureau of Investigation  
12

13 Sworn to me in accordance with Fed.R.Crim.P. 4.1 on **Jun 25, 2025**.

14   
15 The Honorable Stanley A. Boone  
16 United States Magistrate Judge

17 Approved as to form:

18 /s/ Jeffrey A. Spivak  
19 Jeffrey A. Spivak  
20 Assistant United States Attorney  
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