

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 371 – Conspiracy to Commit Mail Theft; Petty
 18 U.S.C. § 1708 – Mail Theft; and Minor
 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation Misdemeanor
 Felony

PENALTY: • Imprisonment: 5 years
 • Fine: \$250,000
 • Supervised Release: 3 years
 • Special Assessment: \$100
 • Forfeiture

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

Gloria E. Navarro, Jessica K. Pardo-Alvarez, and Norman Beltran

DISTRICT COURT NUMBER

4:23-cr-00229 AMO

FILED

Jul 25 2023

Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes } If "Yes" give date filed
 No

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 previously submitted

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

U.S. Postal Service Office of Inspector General

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form Ismail J. Ramsey

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Christopher J. Carlberg

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address: _____

Date/Time: _____ Before Judge: _____

Comments:

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

UNITED STATES OF AMERICA,
V.

FILED
Jul 25 2023
Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

GLORIA E. NAVARRO,
JESSICA K. PARDO-ALVAREZ, and
NORMAN BELTRAN

DEFENDANT(S).

INDICTMENT


18 U.S.C. § 371 – Conspiracy to Commit Mail Theft;
18 U.S.C. § 1708 – Mail Theft; and
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury
Foreman

Filed in open court this 25th day of
July 2023

S. Ybarra
Clerk


Bail, \$ Arrest Warrants

Hon. Alex G. Tse, U.S. Magistrate Judge

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

FILED

Jul 25 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 GLORIA E. NAVARRO,
15 JESSICA K. PARDO-ALVAREZ, and
16 NORMAN BELTRAN,
17 Defendants.

) CASE NO. 4:23-cr-00229 AMO

) VIOLATIONS:

) 18 U.S.C. § 371 – Conspiracy to Commit Mail Theft;
) 18 U.S.C. § 1708 – Mail Theft;
) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
) Forfeiture Allegation

) OAKLAND VENUE

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19 INDICTMENT

20 The Grand Jury charges:

21 Introductory Allegations

22 At all times relevant to this Indictment:

23 1. Defendant Gloria E. NAVARRO was United States Postal Service employee as a Sales and
24 Service Associate at the A Station Berkeley Post Office in Berkeley, California.

25 2. Defendant Jessica K. PARDO-ALVAREZ was United States Postal Service employee as a
26 Sales and Service Associate at the A Station Berkeley Post Office in Berkeley, California.
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INDICTMENT

1 COUNT ONE: (18 U.S.C. § 371 – Conspiracy to Commit Mail Theft)

2 Object of the Conspiracy

3 3. Beginning at a time unknown to the Grand Jury, but no later than in or about September
4 2021, and continuing to in or about May 2022, in the Northern District of California, the defendants,
5 GLORIA E. NAVARRO,
6 JESSICA K. PARDO-ALVAREZ, and
7 NORMAN BELTRAN,
8 did unlawfully and knowingly combine, conspire, and agree with each other to steal or take from or out
9 of the United States mail, post office, mail receptacle, and authorized depository for mail matter located
10 at A Station Berkeley Post Office in Berkeley, California, United States, mail and the contents thereof,
11 in violation of Title 18, United States Code, Section 1708.

11 Manner and Means

12 4. Defendants NAVARRO and PARDO-ALVAREZ used their positions as employees of the
13 United States Postal Service to steal United States mail parcels from the A Station Berkeley Post Office
14 that they suspected to contain marijuana that could be sold for profit.

15 5. Defendants NAVARRO and PARDO-ALVAREZ worked with defendant BELTRAN to
16 remove the identified United States mail parcels from the A Station Berkeley Post Office and then sell
17 marijuana for profit.

18 Overt Acts

19 6. In furtherance of the of the conspiracy, and to accomplish its objects, the defendants
20 committed various overt acts in the Northern District of California, including, but not limited to the
21 following:

22 (A) On or about September 4, 2021, defendants NAVARRO and PARDO-ALVAREZ
23 stole and removed from the United States mail four parcels that had been addressed to Jacksonville,
24 Florida.

25 (B) On or about September 29, 2021, defendants PARDO-ALVAREZ and NAVARRO
26 stole and removed from the United States mail two parcels that had been addressed to Concord, North
27 Carolina.

28 (C) On or about November 4, 2021, defendant PARDO-ALVAREZ stole and removed

1 from the United States mail one parcel that had been addressed to Carolina, Puerto Rico.

2 (D) On or about November 10, 2021, defendant NAVARRO stole and removed from
3 the United States mail two parcels that had been addressed to Gainesville, Florida, by taking them from
4 the mail and giving them to BELTRAN.

5 (E) On or about January 3, 2022, defendant PARDO-ALVAREZ stole and removed
6 from the United States mail one parcel that had been addressed to Wadesboro, North Carolina.

7 (F) On or about February 1, 2022, defendants NAVARRO and PARDO-ALVAREZ
8 stole and removed from the United States mail one parcel that had been addressed to Powell, Tennessee.

9 (G) On or about March 8, 2022, defendant PARDO-ALVAREZ stole and removed
10 from the United States mail one parcel that had been addressed to Orlando, Florida.

11 (H) On or about March 19, 2022, defendant NAVARRO stole and removed from the
12 United States mail one parcel that had been addressed to Lithonia, Georgia, by taking it from the mail
13 and giving it to BELTRAN who took it out of the post office.

14 (I) On or about April 2, 2022, defendants NAVARRO and PARDO-ALVAREZ stole
15 and removed from the United States mail three parcels that had been addressed to New Orleans,
16 Louisiana, Phoenixville, Pennsylvania, and Duluth, Minnesota, respectively, by taking them from the
17 mail and giving them to BELTRAN who took them out of the post office.

18 (J) On or about April 22, 2022, defendant NAVARRO stole and removed from the
19 United States mail one parcel that had been addressed to Chicago, Illinois, by taking it from the mail and
20 giving it to BELTRAN who took it out of the post office.

21 (K) On or about May 28, 2022, defendant PARDO-ALVAREZ stole and removed
22 from the United States mail one parcel that had been addressed to Orlando, Florida, by taking it from the
23 mail and leaving it in the parking lot of the post office for Beltran to retrieve.

24 7. All in violation of Title 18, United States Code, Section 371.

25 COUNT TWO: (18 U.S.C. § 1708 – Mail Theft)

26 8. On or about April 2, 2022, in the Northern District of California, the defendants,

27 GLORIA E. NAVARRO,
28 JESSICA K. PARDO-ALVAREZ, and
NORMAN BELTRAN,

1 did steal or take from or out of the United States mail, post office, mail receptacle, and authorized
2 depository for mail matter located at A Station Berkeley Post Office in Berkeley, California, United
3 States mail and the contents thereof, in violation of Title 18, United States Code, Section 1708.

4 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

5 The allegations contained in the counts of this Indictment are re-alleged and incorporated by
6 reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section
7 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

8 Upon conviction of the offense set forth in this Indictment, the defendants,

9 GLORIA E. NAVARRO,
10 JESSICA K. PARDO-ALVAREZ, and
NORMAN BELTRAN,

11 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
12 Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is
13 derived from proceeds traceable to the offense, and may include a forfeiture money judgment.

14 If any of the property described above, as a result of any act or omission of the defendants:

- 15 a. cannot be located upon exercise of due diligence;
- 16 b. has been transferred or sold to, or deposited with, a third party;
- 17 c. has been placed beyond the jurisdiction of the court;
- 18 d. has been substantially diminished in value; or
- 19 e. has been commingled with other property which cannot be divided without
20 difficulty,

21 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
22 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,
2 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

3
4 DATED: July 25, 2023

A TRUE BILL.

5
6 /s/ Foreperson
7 FOREPERSON
8 SAN FRANCISCO

9 ISMAIL J. RAMSEY
10 United States Attorney

11 /s/ Christopher J. Carlberg
12 CHRISTOPHER J. CARLBERG
13 Special Assistant United States Attorney
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