

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

United States of America

v.

ASHANI ISHMAEL LEVY  
EKEYMA EBONY HARRIS

Case No.

18-1547

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 6/15/18 to 11/21/18 in the county of Allegheny in the Western District District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 1956(h)	Money laundering conspiracy

This criminal complaint is based on these facts:

See attached affidavit in support of criminal complaint, incorporated herein.

Continued on the attached sheet.



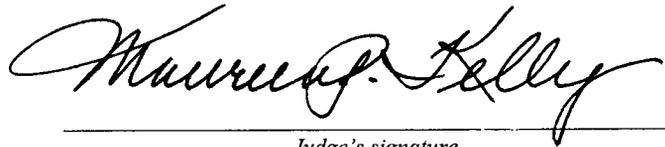
Complainant's signature

Kiera M. Fludd, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/23/2018



Judge's signature

City and state: Pittsburgh, PA

Maureen P. Kelly, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )  
 )  
 v. ) Magistrate No. 18-1547M  
 )  
 ASHANI ISHMAEL LEVY )  
 EKEYMA EBONY HARRIS )

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Kiera M. Fludd, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since June of 2017. I am currently assigned to the Fraud Team for the Pittsburgh Field Office. Before being assigned to the Pittsburgh Field Office, I attended the USPIS's 12-week Postal Inspector training at the Career Development Unit in Potomac, Maryland. By virtue of my USPIS employment, I perform and have performed a variety of investigative tasks, to include assisting other agents in the execution of search and seizure warrants and the collection of evidence including computer/electronic related evidence. I have gained experience in and received training in general law enforcement practices and criminal investigations, including in interviewing and interrogation techniques, in the execution of federal search and seizure warrants, and in the identification and collection of computer-related evidence. Additionally, Your Affiant has been involved in the use of the following investigative techniques: conducting physical surveillance, consensual monitoring and recording communications, and preparing and executing search warrants which have led to substantial seizures of assets and

evidence of criminal activity. I am a law enforcement officer charged with investigating possible violations of federal criminal laws, including Title 18, United States Code, Section 1956(h) (money laundering conspiracy).

2. Through the course of my training and experience, your Affiant has become familiar with the methods and techniques associated with the investigations of white collar schemes to defraud and money laundering. My experience as a Postal Inspector has included the investigation of cases involving mail fraud, wire fraud, money laundering, telephone scams, Internet scams, and other financial crimes.

3. In particular, I have experience investigating mail fraud and/or wire fraud schemes involving "lottery scams" or "sweepstakes scams," as well as other telephone scams. Based on my training and experience, I am aware that, in such schemes, a person or persons associated with the scheme generally contacts private individuals in the United States by telephone and, by fraudulent representations and through other means, induces those victims to send money to specified addresses or recipients. In a "lottery scam" or "sweepstakes scam," a participant in the scheme will falsely inform the victim that he or she has won a large cash prize in a lottery or sweepstakes and that the victim needs to send money to pay taxes or other assessments in order to claim the cash prize. In other telephone scams, a participant in the scheme may falsely represent himself or herself to be a law enforcement officer and instruct the victim to send money in connection with a fictitious investigation involving the victim's bank account, or may induce the victim to send money through other fraudulent representations. In such schemes, the victim is often instructed to send the money in cash via the U.S. mail or a commercial interstate carrier. Based on my training and experience, I am aware that such telephone scams often target elderly persons as victims.

4. Further, based on my training and experience, I am aware that Jamaica is a common place of origin for “lottery scams,” “sweepstakes scams,” and other telephone scams targeting elderly persons and others in the United States.

5. As a federal law enforcement officer, I am authorized to investigate violations of laws of the United States, including the crimes outlined herein, and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

6. I am currently participating in the investigation of Ashani Ishmael LEVY, Ekeyma Ebony HARRIS, and other associated individuals, and this affidavit is in support of a criminal complaint filed against Ashani Ishmael LEVY and Ekeyma Ebony HARRIS. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Ashani Ishmael LEVY and Ekeyma Ebony HARRIS committed the crime of conspiracy to commit money laundering against the United States with each other and with other persons known and unknown, in violation of Title 18, United States Code, Sections 1956(h), from on or about June 15, 2018, to on or about November 21, 2018.

7. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, including other law enforcement personnel and witnesses, review of documents and records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause to arrest as stated herein, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

**PROBABLE CAUSE**

**SUMMARY**

8. The United States Postal Inspection Service, with the assistance of the Longmont (Colorado) Police Department, the Pittsburgh Bureau of Police, and other law enforcement agencies, is conducting an ongoing investigation into a Jamaican telephone scamming scheme. The United States Postal Inspection Service has probable cause to believe that one or more individuals have devised and executed a scheme and artifice to defraud victims by inducing them, by means of fraudulent representations and promises, to send money through the Postal Service and/or a commercial interstate carrier to a residence located in Pittsburgh, Pennsylvania. There is also probable cause to believe that Ashani Ishmael LEVY (“Levy”) and Ekeyma Ebony HARRIS (“Harris”) received proceeds of the fraudulent scheme and, knowing that those funds represented the proceeds of some form of unlawful activity, conspired to launder those proceeds in the Western District of Pennsylvania and elsewhere.

**THE COLORADO VICTIM**

9. On or about November 17, 2018, an 80-year-old woman living in Longmont, Colorado (“Victim 1”) reported to the Longmont Police Department that she had been the victim of a telephone scam.

10. Victim 1 informed a responding officer that, on Thursday, November 15, 2018, she was contacted by phone by an individual who identified himself as “Rayman Harris” and who told her that she had won \$17 million through the Publisher’s Clearing House. “Rayman Harris” instructed her not to tell anyone about the purported prize. Later that day, “Rayman Harris” called Victim 1 again and instructed her to send \$810 in cash to pay associated fees and taxes. “Rayman Harris” told her to send the money via Priority Mail Express to David Miller, 105 Imogene Rd.,

Pittsburgh, PA 15217. On or about November 15, 2018, Victim 1 sent a package containing approximately \$810 to “David Miller” as instructed. (A tracking search by Postal Inspectors indicated that this package was listed as “Delivered” to 105 Imogene Rd., Pittsburgh PA 15217 at 1:35 PM on November 16, 2018.)

11. Victim 1 further stated that, on Friday, November 16, 2018, she received another call from a person who identified himself as “James Holliday,” though he sounded like the same person who contacted her on November 15, 2018. “Holliday” instructed Victim 1 to send an additional \$6,800 in cash to the same address. On or about November 16, 2018, Victim 1 sent a package containing approximately \$6,800 to James Holliday at 105 Imogene Rd., Pittsburgh PA, 15217. This package was a manila envelope and had a tracking number of 7018 0040 0000 8177 0072.

12. In addition, Victim 1 stated that, later on November 16, 2018, she received another call from a different person, a female. This caller instructed Victim 1 to send an additional \$16,000. When Victim 1 expressed concern that the calls were a scam, the caller denied that the calls were a scam and talked about how Victim 1 would receive her \$17 million. Victim 1 did not send any funds in response to this call.

13. Victim 1 stated that the phone numbers associated with these calls showed on her caller ID as Jamaican numbers, and that the people she spoke to on the calls sounded like they had Jamaican accents. While the responding officer was speaking with Victim 1, Victim 1’s phone rang twice from a number in the 876 area code. I am aware that 876 is a telephone area code for Jamaica.

14. Based on my training and experience, the events described by Victim 1 are consistent with a Jamaican “lottery” or “sweepstakes” telephone scam.

15. Longmont, Colorado police officers contacted the Pittsburgh Bureau of Police about the incident. According to Longmont police records, a Pittsburgh Police Officer responded and indicated that he had traveled to 105 Imogene Road in Pittsburgh and spoken to a black female at that residence, identified as Jacquelen Henry. Henry stated that she had just moved to the house from Jamaica the day before, and that the owners were not home. Henry appeared uncomfortable and declined to allow the officer into the residence. The officer observed a U.S. Postal Service bag in a duffel bag on the front porch of the residence, but the USPS bag contained only business cards for a rapper. (Postal Inspectors have confirmed with PBP that an officer did visit 105 Imogene Road, consistent with this report.)

#### THE ARIZONA VICTIM

16. On or about November 20, 2018, Postal Inspectors in the Pittsburgh area responded to this incident. Postal Inspectors determined that approximately 15 packages since June 22, 2018, had been sent via Priority Mail or Express Mail to the 105 Imogene Road address.

17. In addition to the two packages sent by Victim 1, Postal Inspectors determined that at least one other package sent to the 105 Imogene Road address since June 22, 2018, had been linked to fraud. On or about October 25, 2018, grown children of an 89-year-old victim living in Arizona ("Victim 2") reported to law enforcement that Victim 2 had sent a package addressed to John Bolder at 105 Imogene Rd., Pittsburgh PA, 15217 – the same address that was provided to Victim 1. Victim 2's package reportedly contained approximately \$8,000 in cash. Postal Inspectors successfully intercepted this package.

18. On or about October 26, 2018, after law enforcement had intercepted the package sent by Victim 2, a black male entered the East Liberty Post Office in Pittsburgh, Pennsylvania, and asked to pick up that package, which he identified by the address listed on the package. The

black male said that he was retrieving the package for his “cousin” whose name he did not know. Postal employees did not give Victim 2’s package to the black male as he walked out to the lobby to make a phone call and never returned. Surveillance cameras recorded the black male while he was in the Post Office.

THE MANILA PARCEL

19. On November 20, 2018, I and other Postal Inspectors traveled to the East Liberty Post Office in Pittsburgh, PA, and observed a manila envelope (the “manila parcel”) bearing a tracking number of 7018 0040 0000 8177 0072, the same tracking number that Victim 1 provided to law enforcement. The manila parcel was addressed to “James Holliday, 105 Imogene Rd., Pittsburgh PA, 15217”. The manila parcel also contained a return address label bearing Victim 1’s name and address.

20. On November 20, 2018, a United States Postal Inspector conducted a CLEAR records check for the recipient’s name and address listed on the manila parcel. The address is a valid address in the 15217 zip code; however, the names James Holliday, David Miller and John Bolder were not found to be associated with the address. The CLEAR records indicated that Ekeyma HARRIS was associated with the address.

21. Postal Inspectors also determined that the manila parcel’s tracking number, 7018 0040 0000 8177 0072, had been searched on the Postal Service’s public website more than 200 times. Based on my training and experience, this is an unusually high number of tracking searches for a particular package. IP addresses suggested that, while some of these tracking searches appeared to be from Colorado and likely attributable to Victim 1 and/or law enforcement, other tracking searches appeared to be from other locations, including Jamaica.

22. Based on the above facts, Postal Inspectors identified the manila parcel as the parcel sent by Victim 1 to James Holliday containing approximately \$6,800.00 in cash.

23. Victim 1 was contacted telephonically by Postal Inspectors and provided consent for them to open the manila parcel. Postal Inspectors then opened the manila parcel and recovered approximately \$6,800.00 in cash. Postal Inspectors removed the cash, inserted sham material into the manila parcel to replicate its original appearance, and resealed the manila parcel.

24. Postal Inspectors scanned the manila parcel alerted at the East Liberty Post Office to display "Available for Pickup," which would alert individuals tracking the parcel on the Internet through the parcel's tracking number that the parcel had arrived at the East Liberty Post Office and was available for pickup there. During the afternoon of November 20, 2018, numerous tracking searches for manila parcel's tracking number were again recorded on the Postal Service website. However, no person came to the East Liberty Post Office on November 20, 2018, to pick up the manila parcel.

ARREST OF EKEYMA HARRIS AND ASHANI LEVY

25. On Wednesday, November 21, 2018, your Affiant swore out a federal anticipatory search warrant in the Western District of Pennsylvania (Magistrate No. 18-1546), authorizing the search of 105 Imogene Road, Pittsburgh, PA 15217 upon acceptance of the manila parcel by any person at the captioned residence.

26. Later on November 21, 2018, a controlled delivery of the manila parcel was made at 105 Imogene Road, Pittsburgh, PA. During the controlled delivery, a black female (later identified as Ekeyma Ebony HARRIS) accepted the manila parcel at the 105 Imogene Road residence, signed as James Stevens for the parcel, and took the manila parcel into the residence.

Shortly thereafter, pursuant to the anticipatory search warrant, investigators conducted a lawful search of the 105 Imogene Road property.

27. Amongst the items seized during the search of the residence were Western Union receipts of transactions conducted by Ekeyma Ebony HARRIS. The receipts indicated that, on October 19, 2018, Harris had conducted a wire transaction from Western Union facilities in Pittsburgh, Pennsylvania to Jamaica for \$950.00. The receipts also indicated that, on October 24, 2018, Harris had conducted another wire transaction from Western Union facilities in Pittsburgh, Pennsylvania to Jamaica for \$790.00.

28. Additionally, during the search of the residence, law enforcement agents found a Jamaican Passport for Ashani Ishmael LEVY. The photograph depicted on the passport matched the black male in the East Liberty Post Office surveillance photographs associated with Victim 2.

29. On November 21, 2018, your Affiant conducted a voluntary interview with Ekeyma Ebony HARRIS at the 105 Imogene Rd. residence. Harris stated that she is married to Levy. Harris also confirmed that the black male in the East Liberty Post Office surveillance photographs associated with Victim 2 was Levy.

30. During the interview, Harris stated that she and Levy have received packages containing cash and addressed to other individuals' names at the 105 Imogene Road residence, and that she has wired portions of that money to individuals in Jamaica. According to Harris, Levy and Harris have been living at the 105 Imogene Road residence since approximately June 15, 2018. Shortly thereafter, packages containing cash began arriving at the residence. Levy tracked the parcels as they were processed through the mail stream; Harris sometimes accepted these packages herself. Harris and Levy kept between 10%-25% of the cash received in each package, and wired the remaining amount to Jamaica. According to Harris, Levy generally verified the amount of

cash in each parcel, separated their percentage, and gave Harris the remaining amount to be wired to Jamaica. Harris then wired the money to specified individuals in Jamaica whose names she received from Levy. Harris reported that she had sent approximately \$6,000 to Jamaica via Western Union and/or MoneyGram, but stated that that amount that could include wires associated with helping her mother-in-law with her bills.

31. During the interview, Harris additionally stated that, several days prior her acceptance of the manila parcel (in November 2018), Harris told Levy to stop what he was doing because it was illegal. Harris stated that, during this conversation, Levy said he would stop because the amount of money they were making from accepting the packages and wiring the money “wasn’t worth it”. During the interview, Harris also stated that, due to where the money parcels were coming from, she assumed that what they were doing was illegal.

32. Following the conclusion of this interview, based on Harris’s statements and the other evidence adduced in this investigation, investigators conducted a probable cause arrest of Harris.

33. Later in the afternoon of November 21, 2018, law enforcement observed Ashani Ishmael LEVY and another individual entering a vehicle near the 105 Imogene Road residence. Based on the evidence adduced in this investigation, law enforcement approached the vehicle and conducted a probable cause arrest of Levy.

Pursuant to the foregoing, your Affiant respectfully submits there is probable cause to believe that Ashani Ishmael LEVY and Ekeyma Ebony HARRIS violated Title 18, United States Code, Section 1956(h) (conspiracy to commit money laundering) from on or about June 15, 2018, to on or about November 21, 2018, and your Affiant requests that warrants be issued for their arrest.

The foregoing is true and correct to the best of my knowledge, information, and belief.

  
Kiera M. Fludd  
U.S. Postal Inspector  
United States Postal Inspection Service

Sworn and subscribed to before me

this 23<sup>rd</sup> day of November, 2018.

  
MAUREEN P. KELLY  
UNITED STATES MAGISTRATE JUDGE