

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

CHANNEL LESPINASSE and
DEIDRA HARRISON

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Hon. James B. Clark III

Mag. No. 14-3106

CRIMINAL COMPLAINT

I, Karen Veltri, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Karen Veltri
Special Agent
Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence
on the 27th day of May, 2014
at Newark, New Jersey

HONORABLE JAMES B. CLARK III
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count 1
(Conspiracy to Obstruct Commerce by Extortion
Under Color of Official Right)

In or about November 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants

CHANNEL LESPINASSE and
DEIDRA HARRISON

and others did knowingly and intentionally conspire to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting and agreeing to accept a corrupt payment that was paid by another, with that person's consent, in exchange for defendant CHANNEL LESPINASSE's official action and assistance in violation of her official duties at the Essex County Correctional Facility as specific opportunities arose.

In violation of Title 18, United States Code, Section 1951(a).

Count 2
(Conspiracy to Provide, Obtain and Possess
Contraband in a Correctional Facility)

In or about November 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants

CHANNEL LESPINASSE and
DEIDRA HARRISON

and others did knowingly and intentionally conspire to commit an offense against the United States, by providing a prohibited object to an inmate of a prison, specifically a cellular telephone, and an inmate of a prison obtaining and possessing such prohibited object, contrary to Title 18, United States Code, Sections 1791(a) and (d)(1)(F), and did an act to effect the object of the conspiracy.

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Karen Veltri, am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have personally participated in this investigation and am aware of the facts contained herein based upon my own participation in this investigation, interviews and briefings with other law enforcement officers and interviews and briefings with confidential sources of information and witnesses. I also have reviewed publicly-available documents and reports, and other evidence, including pen registers, surveillance and consensual recordings. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not set forth herein each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. All referenced times are approximate and refer to Eastern Standard Time. Unless otherwise indicated, statements attributable to individuals are related in substance and in part.

1. At times relevant to this complaint:

- a. Defendant CHANNEL LESPINASSE (“LESPINASSE”) was a Corrections Officer at the Essex County Jail. LESPINASSE utilized a cellular telephone (the “Lespinasse Phone”).
- b. Defendant DEIDRA HARRISON (“HARRISON”) was an associate of LESPINASSE. HARRISON utilized a cellular telephone (the “Harrison Phone”).
- c. The Essex County Jail was a facility in Newark, New Jersey, that held federal pretrial detainees by direction of or pursuant to a contract or agreement with the United States Attorney General.
- d. There was a cooperating witness (“CW-1”) incarcerated at the Essex County Jail. CW-1 has cooperated with law enforcement in the hopes of obtaining a more favorable outcome with respect to pending federal criminal charges.

2. According to CW-1, on November 16, 2013, LESPINASSE agreed to bring CW-1 a cellular telephone in exchange for \$1,000. CW-1 gave LESPINASSE the phone number of CW-1’s purported girlfriend’s cousin to contact to arrange for the delivery of this cellular telephone – the phone number that LESPINASSE received actually belonged to an undercover FBI agent (“UC-1”).

3. According to telephone toll records, there were 8 phone calls between the Lespinasse Phone and the Harrison Phone on November 16, 2013, between 11:44 AM and 12:53 PM.

4. On November 16, 2013, at 10:16 PM, HARRISON sent a text message to UC-1 stating: "I am contacting you for [CW-1] [CW-1] told me to contact u."¹

5. According to telephone toll records, there were 5 text messages and 8 phone calls between the Harrison Phone and the Lespinasse Phone on November 16, 2013, between 10:14 PM and 11:47 PM.

6. On November 17, 2013, at 10:40 AM, HARRISON spoke to UC-1 in a consensually recorded conversation. HARRISON was informed by UC-1 that UC-1 was calling on behalf of CW-1. UC-1 then asked HARRISON: "So how's this supposed to work?" and HARRISON responded, "You want me to meet you somewhere?" HARRISON and UC-1 agreed to meet in the parking lot of a McDonald's restaurant in Newark, New Jersey, at 6:30 PM the same day.

7. According to telephone toll records, immediately after the telephone call between HARRISON and UC-1 on November 17th, there was a telephone call between the Harrison Phone and the Lespinasse Phone that lasted for approximately 14 minutes.

8. Later that day, at 6:13 PM, HARRISON sent a text message to UC-1 that said "At the location waiting." At 6:20 PM, HARRISON and UC-1 met in the parking lot of a McDonald's restaurant in Newark, New Jersey. The conversation was recorded. UC-1 asked HARRISON: "The phone now, you gonna put it in his [CW-1's] hands?" HARRISON replied: "It's gonna be in his hands, it'll be in his hands." HARRISON then accepted from UC-1 a cellular telephone, a charger, and the \$1,000 cash payment. The cellular telephone was purchased in Pennsylvania and manufactured in China.

9. After HARRISON accepted the cellular telephone, charger, and \$1,000, HARRISON was told by UC-1 to "count" the money, because UC-1 did not want the phone to come up "missing." HARRISON told UC-1 to trust her and that the phone "[would] be delivered properly." HARRISON then told UC-1 that they "were both taking a chance right now on this." UC-1 informed HARRISON that UC-1 expected HARRISON to successfully deliver the cellular telephone, saying "I don't want it to come up missing. You know, that's a 1,000 dollars, you know." HARRISON again reassured UC-1, stating "It won't, you ain't gotta worry about that."

10. According to telephone toll records, there was a call between the Lespinasse Phone and the Harrison Phone at 9:08 PM on the night of November 17, 2013 that lasted for approximately 48 seconds.

11. According to CW-1, on the night of November 17, 2013, LESPINASSE contacted CW-1. LESPINASSE told CW-1 that LESPINASSE had asked her sister to pick up the cellular telephone. LESPINASSE also told CW-1 that her sister had stated that she hoped LESPINASSE did not get the both of them locked up.

¹ Text messages in this Affidavit sometimes contain capitalization, spelling, and grammatical errors. Such messages are quoted in this Affidavit as originally transmitted.

12. According to Essex County Jail records, LESPINASSE did not work on Monday, November 18 or Tuesday, November 19, 2013.

13. On or about November 20, 2013, in the evening, according to CW-1, LESPINASSE gave CW-1 a cellular telephone and a charger. The cellular telephone and charger were subsequently turned over to law enforcement. Law enforcement confirmed that the cellular telephone and charger were the same items given by UC-1 to HARRISON on the evening of November 17, 2013.

14. Telephone toll records reveal a call from the Lespinasse Phone to the Harrison Phone at 6:00 PM on November 20, 2013, and 5 text messages between the Lespinasse Phone and the Harrison Phone between 10:09 PM and 10:20 PM on November 20, 2013.