

AFFIDAVIT

I, Timothy Merges, being duly sworn, state as follows:

Background of Affiant

1. I am a Special Agent with the United States Postal Service Office of Inspector General (“Postal OIG”) and have been so employed since approximately 2008. Before that, I was a Postal Inspector with the United States Postal Inspection Service (“USPIS”) for approximately 12 years. I am currently assigned to the Great Lakes Area Field Office, Chicago Division. My responsibilities include the investigation of Mail Theft crimes.

Basis and Purpose of Affidavit

2. This affidavit is submitted in support of a criminal complaint alleging that ARAMIS BROWN has violated Title 18, United States Code, Section 1709.

3. This affidavit is also made in support of an application for a warrant to search: (a) the US Express Mail Parcel with Tracking Number EK885871081US, described further in Attachment A1 (“**Subject Parcel 1**”); (b) the US Express Mail Parcel with Tracking Number EK773059730US, described further in Attachment A2 (“**Subject Parcel 2**”); and (c) the US Express Mail Parcel with Tracking Number EK455211835US, described further in Attachment A3 (“**Subject Parcel 3**”) (collectively, the “**Subject Parcels**”), for evidence, instrumentalities, fruits, and contraband described further in Attachment B, concerning theft of mail and

narcotics offenses, in violation of Title 18, United States Code, Section 1709, and Title 21, United States Code, Sections 841(a)(1) and 843(b).

4. The information set forth in this affidavit is based on my own personal observations and knowledge; my participation in this investigation; my review of documents and reports related to this investigation; my review of audio and video recordings made during this investigation, including consensually recorded conversations; and information conveyed to me by other local, state, and federal law enforcement officers.

5. Because this affidavit is being submitted for the limited purpose of showing there is probable cause for the foregoing complaint and search warrants for the **Subject Parcels**, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence, instrumentalities, fruits, and contraband of violations of Title 18, United States Code, Section 1709, and Title 21, United States Code, Sections 841(a)(1) and 843(b), are located within the **Subject Parcels**. I have also set forth facts I believe are sufficient to establish probable cause that BROWN has violated Title 18, United States Code, Section 1709.

FACTS IN SUPPORT OF PROBABLE CAUSE

Overview of the Investigation

6. Beginning in January 2015, the Postal OIG and the U.S. Postal Inspection Service (“USPIS”) have been investigating allegations that Postal Service employees at the International Service Center located at O’Hare Airport, Chicago,

Illinois (“International Service Center”) have been opening and stealing the contents of Express Mail and Priority Mail parcels. As discussed below, these rifled Express and Priority Mail parcels fit the general profile for parcels which contain narcotics, in that they are often sent from narcotics source states, from fictitious senders or to fictitious recipients, and narcotics sniffing canines alert to the parcels, and the circumstances suggested that the Postal Service employees are stealing narcotics from the parcels.

7. Based on information obtained by surveillance and other sources, the USPIS and Postal OIG have identified ARAMIS BROWN (“BROWN”) as a Postal Service employee who, along with other Postal Service employees, is stealing narcotics out of Express and Priority Mail parcels. The USPIS’s and Postal OIG’s investigation has shown that BROWN has stolen the contents of at least 12 pieces of mail since April 7, 2015. BROWN is employed by the Postal Service as a full time Mailhandler at the International Service Center.

On February 12, 2015, the USPIS Intercepted Two Parcels of Unequal Weight Containing Cannabis and Conducted A Controlled Delivery of the Parcels. The Person Who Accepted the Parcels Later Told Law Enforcement that He Expected Both Parcels to Contain Marijuana and Weigh the Same.

8. On February 11, 2015, Postal Inspectors intercepted two Priority Mail Express parcels at the International Service Center that were both sent from the same sender and destined to the same recipient. After a narcotics sniffing dog alerted to the parcels, Postal Inspectors obtained search warrants from United States Magistrate Judge Daniel G. Martin for each parcel, opened them, and

observed that one parcel contained approximately 7 pounds of marijuana while the other parcel contained approximately 2.32 pounds of marijuana. The Postal Inspectors also observed that the lighter parcel appeared to be missing packaging material and the tape on the exterior of the box had been cut and additional tape was added. Further the shipping label for each parcel indicated that each parcel, when mailed, weighed approximately 17 pounds. This weight included not only the marijuana, but also the packaging material.

9. The next day, February 12, 2015, Postal Inspectors and Chicago Police conducted a controlled delivery of the aforementioned parcels to an address in Chicago, Illinois and arrested Individual A after he accepted delivery of the parcels. After his arrest, Individual A stated that he expected each parcel to contain marijuana and he was expecting the same amount of marijuana in each parcel.

On April 7, 2015, BROWN Opened and Stole the Contents of Several Mail Parcels.

10. On April 7, 2015, Postal OIG and the USPIS were conducting surveillance at the International Service Center when, during a shift when BROWN was working as a Mailhandler and observed BROWN transport a cart containing outbound international mail parcels from a sorting station to the International Express Mail sort area of the workroom floor. Postal OIG agents then observed BROWN remove several parcels from this cart and rifle them out of view of myself and the other observing agents, before returning what appeared to be the same parcels to his cart. Postal OIG agents then observed BROWN return this cart to its original sorting station, where the cart was transported by another Postal employee

to a local Express Mail sorting area. Postal Inspectors responded within three minutes and observed that the parcels on this cart had been sorted for local delivery. Postal Inspectors searched this area and recovered two parcels which appeared to have been opened in that the tape on the exterior of each box had been cut and resealed with new tape.

11. Postal Inspectors received consent to open one parcel, which contained approximately 1.51 pounds of cannabis. At the time of the search, this parcel weighed approximately 5 pound 3 ounces, including marijuana and packing materials. However, Postal Inspectors reviewed the parcel's mailing label which indicated that it weighed approximately 10 pounds 2 ounces at the time of mailing.

12. After a narcotics sniffing dog alerted to the second parcel, Postal Inspector Alexander Lupiani obtained a search warrant from United States Magistrate Judge Jeffery Cole for this parcel, opened it, and observed that it contained approximately 2.31 pounds of marijuana. PI Lupiani also observed that the mailing label for this parcel indicated that, when it was mailed, it weighed approximately 9 pounds and 6 ounces. However, at the time of the search it only weighed approximately 6 pounds and 12 ounces.

On April 8, 2015, BROWN and INDIVIDUAL B Worked Together to Mis-Sort and Steal the Contents of Several Mail Parcels.

13. On April 8, 2015, Postal OIG and the USPIS were conducting surveillance at the International Service Center when Postal OIG Special Agent Lisa Crayton observed INDIVIDUAL B take several parcels and place them in a

cart designated for International Express mail. I later observed BROWN take this cart and transport it to the International Express Mail sort area of the workroom floor. Postal OIG agents observed BROWN open at least one parcel on this cart before returning the cart back to its original sort location.

14. Postal OIG agents also observed BROWN enter the employee locker room numerous times during his shift. After BROWN and INDIVIDUAL B's shift ended PI Lupiani entered the employee locker room and recovered an empty plastic tub with tape completely surrounding the lid from the locker-room trash. In my training and experience, this tub appeared to be the type of tub used by drug traffickers to send vacuum sealed bags of marijuana through the mail. The seams of these tubs are often taped shut to mask the odors from inside tub.

15. Later that day, Postal Inspectors observed BROWN exit the International Service Center at the end of his shift carrying a backpack which appeared bulky and full. Postal Inspectors observed BROWN place this backpack into his vehicle before driving away from the employee lot.

On April 9, 2015, the USPIS and Postal OIG Observed BROWN Steal the Contents of Several Mail Parcels.

16. On April 9, 2015, Postal OIG and the USPIS again conducted surveillance at the International Service Center when I observed BROWN transport a cart to the International Express sort area of the workroom floor. I observed BROWN remove parcels from this cart, open them, and remove their contents, and place their contents in a backpack. Postal OIG agents then observed BROWN enter

the employee locker room carrying this backpack and that he exited a few minutes later without the backpack. I then observed BROWN return to the parcels, remove two stuffed animals and again enter the employee locker room, exiting a short time later without the animals. Postal OIG agents then observed BROWN return this cart to its original location.

17. Postal OIG Agents and Postal Inspectors maintained surveillance on these parcels until PI Lupiani was able to go to this area and recover three parcels. One of the parcels appeared to be intact and was returned to the mailstream. The other two parcels appeared to be rifled in that the tape on the exterior of the box had been cut and resealed with new tape. After a narcotics sniffing dog alerted to the parcels, PI Lupiani obtained search warrants from United States Magistrate Judge Jeffrey Cole for each parcel, opened them, and found that one contained newspaper and a small white towel and the other contained spray foam and nothing else. PI Lupiani examined the shipping labels for each parcel which indicated that the first parcel weighed approximately 4 pounds and 12 ounces at the time of shipping and yet at the time it was opened this parcel it weighed only 1 pound and 8.6 ounces. The shipping label for the second parcel indicated that it weighed approximately 5 pounds and 15 ounces at the time of shipping, yet only weighed 2 pounds 1.5 ounces at the time PI Lupiani opened it. Additionally, this parcel contained only spray foam, which, in my experience, is often used by drug traffickers when sending narcotics through the mail.

18. Later that day, Postal Inspectors observed INDIVIDUAL B leave the International Service Center and enter the employee parking lot at the end of his shift carrying a backpack which appeared bulky and full. Postal Inspectors observed INDIVIDUAL B place this backpack into his vehicle before driving away from the employee lot.

On April 15, 2015, BROWN Stole the Contents of Several Mail Parcels.

19. On April 15, 2015, Postal OIG and the USPIS again conducted surveillance at the International Service Center when I observed BROWN transport a cart containing outbound international mail parcels from a sorting station to the International Express Mail sort area of the workroom floor. Postal OIG Special Agent Ryan Petry observed BROWN remove several parcels from this cart and open three parcels and place the opened parcels into a cart. SA Petry then observed BROWN enter the men's locker room and exit a few minutes later carrying a blue backpack. BROWN then went to the cart with the rifled parcels and placed items from the cart inside his backpack. BROWN then returned to the men's locker room carrying the backpack and exited a few minutes later empty handed. SA Petry then observed BROWN reseal the opened parcels and return them to their original location. After BROWN left the area, I examined the area where BROWN left this carts, but was unable to recover any rifled mail.

On April 16, 2015, BROWN and INDIVIDUAL B Worked Together to Mis-Sort Steal the Contents of Several Mail Parcels.

20. On April 16, 2015, the USPIS and Postal OIG agents again conducted surveillance at the International Service Center when Postal OIG agents observed BROWN transport a cart to the International Express Mail sort area of the workroom floor. Postal OIG agents observed BROWN remove parcels from this cart, open them, and remove their contents and place some of the contents in a backpack. Postal OIG agents also observed BROWN remove a white Priority mail box from one of the parcels and place it in a bulk mail container. Approximately 30 minutes later, PI Lupiani inspected the local Express Mail sort area and recovered two parcels. Each appeared rifled in that the tape on the exterior of the box had been cut and resealed with new tape.

21. PI Lupiani examined the first parcel and observed that it was addressed to Individual C. PI Lupiani was able to make contact with Individual C, who gave me consent to open her parcel, which was empty. Individual C informed PI Lupiani that, when shipped, her parcel contained a miniature dollhouse worth approximately \$850 which she had shipped for a convention.

22. After a narcotics sniffing dog alerted to the second parcel, PI Lupiani obtained a search warrant from United States Magistrate Judge Susan E. Cox, opened the parcel, and found that it contained empty bubble wrap and an empty plastic toolbox. PI Lupiani examined the shipping label for this parcel which indicated that the first parcel weighed approximately 6 pounds and 11 ounces at the

time of mailing and yet at the time he opened this parcel it weighed only 4 pounds and 7.2 ounces.

23. Later that day, Postal Inspectors observed BROWN exit the International Service Center at the end of his shift, enter his vehicle, and drive away. He carried a backpack at that appeared to be the same backpack Postal Inspectors observed him carry on previous occasions, and this backpack appeared full and bulky.

24. Additionally, on April 17, 2015, Acting Chief Judge Samuel Der-Yeghiayan authorized the installation of tracking devices on vehicles driven by both BROWN and Individual B.

On April 29, 2015, BROWN Stole the Contents of Several Mail Parcels.

25. On April 29, 2015, the USPIS and Postal OIG again conducted surveillance at the International Service Center. At approximately 6:30 a.m., I observed BROWN transporting a cart to the International Express Mail sort area of the workroom floor. I then observed BROWN leave this cart, enter the employee locker room, and exit a few minutes later carrying a blue backpack. I then observed BROWN return to the International Express Mail sort area. I then observed BROWN remove a parcel, cut the tape sealing the parcel, and remove turquoise and green plastic bags from this parcel. I then observed BROWN reseal this parcel with clear tape. BROWN then took the turquoise and green bags to his backpack before moving out of my view.

26. A few seconds later, I observed BROWN carrying the turquoise and green bags, which were now empty, and throwing them into a nearby trash can. I then observed BROWN return to his cart and appear to open a second parcel. After BROWN opened the second parcel, he picked up his backpack and re-entered the employee locker room before exiting a few minutes later and returning to his cart, still carrying the blue backpack. Once at the cart, BROWN placed two more items into the backpack, then resealed the second parcel that he opened, and placed both rifled parcels into his cart. BROWN then reentered the employee locker room carrying the backpack and exited a few minutes later without the backpack. BROWN then transported this cart away from the International Express Mail sort area. I then contacted PI Lupiani who recovered the parcels within 30 minutes of my observations of BROWN. Upon recovering the parcels, investigators observed that each parcel appeared rifled in that the tape on the exterior of the box had been cut and resealed with new tape.

27. At approximately 7:27 a.m., Postal OIG agents observed BROWN and INDIVIDUAL B enter the employee locker room within three minutes of each other. I then observed INDIVIDUAL B exit the locker room carrying a black backpack which appeared partially full. INDIVIDUAL B then clocked out for the end of his shift, entered his vehicle, and drove away from the employee lot. USPIS Inspectors also observed BROWN leave at the end of his shift carrying a blue backpack which appeared to be partially full.

28. I also later recovered the turquoise and green bags that BROWN threw in the trash.

29. After a narcotics sniffing dog alerted to the each of the parcels investigators recovered, PI Lupiani obtained search warrants from United States Magistrate Judge Mary M. Rowland for the parcels, and opened them, and found that one contained approximately 1.3 pounds of marijuana and the other was empty. PI Lupiani examined the shipping labels for each parcel which indicated that the first parcel, weighed approximately 6 pounds and 3 ounces at the time of shipping and yet at the time he opened this parcel it weighed only 2 pounds and 5.2 ounces. The shipping label for the second parcel indicated that it weighed approximately 3 pounds and 5.9 ounces at the time of shipping, yet only weighed 14.3 ounces at the time PI Lupiani opened it.

On April 30, 2015, BROWN Stole the Contents of Several More Mail Parcels.

30. On April 30, 2015, the USPIS and Postal OIG again conducted surveillance at the International Service Center, when I observed BROWN transporting a cart to the International Express Mail sort area of the workroom floor. I then observed BROWN remove a parcel from this cart, open it, remove two shrink wrapped objects from this parcel, which BROWN then placed into the blue backpack investigators observed on earlier occurrences. In my training and experience, I know that narcotics traffickers package narcotics in shrink wrap in order to mask odors. I also observed BROWN doing something else with his hands in the cart while his hands were out of the agents' view. I then observed BROWN

enter the employee locker room carrying this backpack before exiting a few minutes later, empty handed. I then observed BROWN retape the parcel he opened, place it back on the cart, and transport the cart to the local express mail sort area. I contacted the Postal Inspectors and within 30 minutes PI Lupiani recovered two parcels, one addressed to Individual D with tracking number EK449205235US and one addressed to Individual E with tracking number EK551571120US from this cart. Upon recovering the parcels, investigators observed that each parcel appeared rifled in that the tape on the exterior of the box had been cut and resealed with new tape.

31. The USPIS also conducted surveillance of BROWN and INDIVIDUAL B as they exited the International Service Center at the end of their shifts. Postal Inspectors observed INDIVIDUAL B carrying a black backpack which appeared full, which INDIVIDUAL B placed into his vehicle. BROWN exited the International Service Center carrying the same blue backpack which appeared full, approached INDIVIDUAL B's vehicle, and spoke with INDIVIDUAL B before entering INDIVIDUAL B's vehicle through the passenger side door. After a few minutes, BROWN exited INDIVIDUAL B's vehicle and approached his own vehicle, placing the blue backpack inside. Postal Inspectors then observed BROWN approach a Volkswagen sedan, enter in the passenger's side, and remain for a few minutes. While BROWN was in the Volkswagen, a Chevrolet Malibu approached the Volkswagen. BROWN then exited the Volkswagen, entered the Malibu, and the Malibu drove to a remote area of the employee parking lot. Once there, the driver of

the Malibu exited the vehicle and pulled a grocery bag out of the trunk before reentering the vehicle. The men remained in the vehicle for a few minutes before BROWN exited the Malibu and walked towards the Volkswagen, and reentered it. BROWN remained in the Volkswagen for a few minutes before exiting, entering his own vehicle, and driving away from the employee lot.

32. PI Lupiani obtained search warrants from United States Magistrate Judge Mary M. Rowland for the parcels, and opened them, and found each contained only packing peanuts. PI Lupiani examined the shipping labels for each parcel which indicated that the first parcel weighed approximately 6 pounds and 3 ounces at the time of shipping and yet at the time he opened this parcel it weighed only 1 pound and 8.9 ounces. The shipping label for the second parcel indicated that it weighed approximately 4 pounds and 1 ounce at the time of shipping, yet only weighed 1 pound and 15 ounces at the time PI Lupiani opened it.

Subject Parcels 1 and 2: On May 7, 2015, BROWN Opened and Stole the Contents of an Additional Two Parcels. A Narcotics Sniffing Canine Later Alerted to These Parcels.

33. On May 7, 2015, Postal OIG and the USPIS again conducted surveillance at the International Service Center, when I observed BROWN working in the International Express Mail sort area of the workroom floor. I then observed BROWN remove two parcels from a cart, set them on the floor, and lean over them with his hands out of view of myself and the other observing agents. I then observed BROWN enter the employee locker room, exit a few minutes later, and return to the International Express Mail sort area carrying the same blue backpack. I then

observed BROWN lean over the opened parcels with his hands out of view. I then observed BROWN place his blue backpack in a nearby cart. I then observed BROWN return to the parcels on the floor, reseal one of the parcels, and place the resealed parcel into a nearby cart. I then observed BROWN enter the employee locker room carrying a black backpack and exit a few minutes later empty handed. I then observed BROWN return to the blue backpack, pick it up, and take it into the employee locker room, before exiting a few minutes later empty handed. I then observed BROWN pick up an empty mail tub, return to the parcel on the floor, and then place a padded manila envelope into a Postal tub. BROWN then covered the envelope with a plastic sheet before returning to the opened parcel, resealing the parcel, and placing it into a cart. I then observed BROWN carry the tub into the employee locker room and exit a few minutes later carrying an empty tub. BROWN then took this tub, carried it over to the tub with the envelope, stacked the empty tub over the tub with item, and carried both into the employee locker room. BROWN exited the locker room a few minutes later empty handed.

34. I then alerted a Postal Service supervisor and observed her recover both parcels opened by BROWN. I took possession of the parcels from her, and observed that the two parcels appeared rifled in that the tape on the bottom exterior of the box had been cut and resealed. I then turned these parcels over to PI Lupiani.

35. PI Lupiani inspected the first parcel (**Subject Parcel 1**) and observed that was mailed on May 6, 2015, from Chico, California and is addressed to “872-708-8872, Angel Cardenas, 4531 Apple Orchard ln, Rockford, IL 61108,” with a

return address of “530-934-2822, Mobile Home trailers, 3902 Esplanade, Chico, Ca 95973.” **Subject Parcel 1** bears \$67.30 in postage, measures approximately 15 inches by 12 inches by 10 inches, and weighs approximately 1 pound and 7.8 ounces. However, the mailing label indicates that it weighed approximately 6 pounds and 6 ounces at the time of mailing.

36. PI Lupiani also inspected the second parcel (**Subject Parcel 2**) and observed that was mailed on May 6, 2015, from Olivehurst, California and is addressed to “One Stop Shop, 4351 S Cottage grove, Chicago, IL 60653,” with a return address of “Nick Morton, 1512 Norfolk ave, West Sacramento 9569.” **Subject Parcel 2** bears \$56.05 in postage, measures approximately 14 inches by 14 inches by 14 inches, and weighs approximately 1 pound and 5.5 ounces. However, the mailing label indicates that it weighed approximately 4 pounds and 4 ounces at the time of mailing.

37. PI Lupiani observed several characteristics about **Subject Parcels 1** and **2** that, in my training and experience, can be consistent with parcels containing a controlled substance.

38. First, he ran the sender and recipient names and addresses on **Subject Parcel 1** through a law enforcement database. This search revealed that, while the sender’s address is legitimate, there is no business named “Mobile Home Trailers” that is associated with that address. This search also revealed that, while the recipient’s address is legitimate, there is no “Angel Cardenas” associated with that address. Based on my training and experience, fictitious sender or receiver

names, and fictitious return addresses, can indicate that the sender or receiver does not want to be associated with the parcel.

39. PI Lupiani also ran the sender and recipient names and addresses on **Subject Parcel 2** through a law enforcement database. This search revealed that, while the sender's address is legitimate, there is no "Nick Morton" who is associated with that address. Based on my training and experience, fictitious sender or receiver names, and fictitious return addresses, can indicate that the sender or receiver does not want to be associated with the parcel.

40. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on PI Lupiani's training and experience, however, the combination of these characteristics, along with his experience in this investigation, led him to investigate further by calling in a narcotics dog to perform further examination of **Subject Parcels 1 and 2**.

41. On May 7, 2015, PI Lupiani arranged for an U.S. Customs and Border Protection Canine Officer and his canine partner, "Kajo," to meet with him and examine **Subject Parcel 1**. According to the Canine Officer, Kajo is certified annually by U.S. Customs and Border Protection as a narcotics dog. Kajo was most recently re-certified in September, 2014. Kajo is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Kajo is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS

records, Kajo has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 93 occasions since June 2013, with a success rate of approximately 96%. To the best of PI Lupiani's knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available. On May 7, 2015, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, PI Lupiani arranged a controlled substance detection test by placing **Subject Parcel 1** among approximately 20 other parcels in the workroom area. He then witnessed Kajo examine the parcels and observed Kajo alert by sitting next to **Subject Parcel 1**. Kajo did not alert to any of the other parcels. The Canine Officer informed PI Lupiani that Kajo's actions indicated the presence of narcotics and/or controlled substances in **Subject Parcel 1**. PI Lupiani then took custody of **Subject Parcel 1**.

42. That same day, the U.S. Customs and Border Protection Canine Officer and Kajo also examined **Subject Parcel 2**. PI Lupiani arranged a second controlled substance detection test by placing **Subject Parcel 2** among approximately 20 parcels in the workroom area. He then witnessed Kajo examine the parcels and observed Kajo alert by sitting next to **Subject Parcel 2**. Kajo did not alert to any of the other parcels. The Canine Officer informed PI Lupiani that Kajo's actions indicated the presence of narcotics and/or controlled substances in **Subject Parcel 2**. PI Lupiani then took custody of **Subject Parcel 2**.

Subject Parcel 3: On May 8, 2015, the USPIS Recovered a Parcel that Appears to Have Been Opened and Resealed by BROWN.

43. On May 8, 2015, the USPIS intercepted one Priority Express Mail parcel (**Subject Parcel 3**) at the International Service Center. **Subject Parcel 3** was intercepted in the local Express Mail sort area, which is the same area where many parcels opened by BROWN were recovered by the USPIS during this investigation. Postal Inspectors examined **Subject Parcel 3** and observed that it appeared rifled in that the tape on the bottom exterior of the box had been cut and resealed with new tape. This is consistent with other parcels recovered that had been opened and resealed by BROWN. Additionally, I have reviewed Postal Service records that show BROWN was working his normal shift at the International Service Center on May 8, 2015, the same day **Subject Parcel 3** was intercepted.

44. PI Lupiani took possession of **Subject Parcel 3**, inspected it, and observed that was mailed on May 7, 2015, from Chico, California 95926 and is addressed to “Jordon Knox, 3001 N. Albany Way #1F, Chicago, IL 60618” with a return address of “Shasta Lee, 2447 Dwight Way, Berkley, CA 94704.” **Subject Parcel 3** bears \$56.05 in postage, measures approximately 17.5 inches by 11.5 inches by 8.75 inches, and weighs approximately 1 pound and 11.9 ounces. However, the mailing label indicates that it weighed approximately 4 pounds and 3 ounces at the time of mailing.

45. P Lupiani also observed several characteristics about **Subject Parcel 3** that, in my training and experience, can be consistent with a parcel containing a controlled substance.

46. First, PI Lupiani ran the sender and recipient names and addresses on **Subject Parcel 3** through a law enforcement database. This search revealed that, while the sender's address is legitimate, there is no "Shasta Lee" that is associated with that address. This search also revealed that, while the recipient's address is legitimate, there is no "Jordon Knox" associated with that address. Based on my training and experience, fictitious sender or receiver names, and fictitious return addresses, can indicate that the sender or receiver does not want to be associated with the parcel.

47. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on his training and experience, however, the combination of these characteristics, along with his experience in this investigation, led PI Lupiani to investigate further by calling in a narcotics dog to perform further examination of **Subject Parcel 3**.

48. On May 8, 2015, PI Lupiani arranged for a United States Customs and Border Protection Canine Officer and his canine partner, "Hannah," to meet with him and examine **Subject Parcel 3**. According to the Canine Officer, Hannah is certified annually by U.S. Customs and Border Protection as a narcotics dog. Hannah was most recently re-certified in September, 2014. Hannah is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of

heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Hannah is also trained to indicate the presence of such substances or their scents by alerting to the item she is sniffing. In addition, according to USPIS records, Hannah has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 15 occasions since December 2014, with a success rate of approximately 94%. To the best of PI Lupiani's knowledge, the United States Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available. On May 8, 2015, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, PI Lupiani arranged a controlled substance detection test by placing **Subject Parcel 3** among approximately 20 other parcels in the workroom area. PI Lupiani then witnessed Hannah examine the parcels and observed Hannah did not alert to **Subject Parcel 3**. Based on my training and experience, as well as my experience in this case, I believe that Hannah did not alert to **Subject Parcel 3**, because, based on our earlier observations, after opening parcels, BROWN often removes the entirety of the contents for his own use. Based on my experience in this case, BROWN often removes narcotics from the parcels opens and, in my training and experience, narcotics traffickers often package narcotics in shrink wrap to mask odors. Additionally, as discussed above, the mailing label indicates that **Subject Parcel 3** was approximately 2 pounds heavier at the time of mailing, indicating that BROWN

removed whatever was of value inside **Subject Parcel 3** when he rifled it. PI Lupiani then took custody of **Subject Parcel 3**.

CONCLUSION

49. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on April 30, 2015, ARAMIS BROWN, a United States Postal Service employee, namely, a full time Mailhandler, did embezzle mail and articles and things contained therein entrusted to him and which came into his possession intended to be conveyed by mail, namely, one piece of mail addressed to Individual D with tracking number EK449205235US and one piece of mail addressed to Individual E with tracking number EK551571120US, in violation of Title 18, United States Code, Section 1709.

50. Additionally, based on the above information, I respectfully submit that there is probable cause to believe that theft of mail and narcotics offenses, in violation of Title 18, United States Code, Section 1709 and Title 21, United States Code, Sections 841(a)(1) and 843(b), have been committed, and that evidence, instrumentalities, fruits and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Parcels**, as further described in Attachments A1, A2, and A3. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcels** more particularly described in Attachments A1, A2, and A3, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.

Timothy Merges
Special Agent
United States Postal Service, Office of
Inspector General

Subscribed to and sworn before
me this ____ day of May, 2015

MICHAEL T. MASON
United States Magistrate Judge