

DMP:KTF
F. #2016R2023

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

MAHALIA ABRAHAM and
WILLIAM HOPKINS,

Defendants.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

Christos Hilas, being duly sworn, deposes and states that he is an Assistant Inspector General with New York City Department of Investigation ("DOI") Office of the Inspector General ("OIG"), duly appointed according to law and acting as such.

Upon information and belief, in or about and between July 2014 and April 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MAHALIA ABRAHAM and WILLIAM HOPKINS, together with others, did knowingly and willfully embezzle, steal, purloin, and convert to their use and the use of another, and without authority, sell, convey, and dispose of a record, voucher, money, and thing of value of the United States and a department or agency thereof, to wit: the United States Department of Agriculture, Food and Nutrition Service, the value of which exceeded \$1,000.

(Title 18, United States Code, Sections 641 and 2)

17 M 282

**TO BE FILED
UNDER SEAL**

COMPLAINT AND
AFFIDAVIT IN
SUPPORT OF
APPLICATION FOR
ARREST WARRANT

(18 U.S.C. §§ 641 and 2)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am an Assistant Inspector General with New York City DOI OIG, and have been since August 2015. Before then I was a Special Investigator/Deputy Counsel with New York City DOI OIG. In my roles at the New York City DOI OIG, I have been involved in the investigation of numerous cases involving benefits fraud, theft of government funds, mail fraud and wire fraud. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendants' criminal history record; and from reports of other law enforcement officers involved in the investigation.

BACKGROUND

I. The "SNAP" and "TANF" Programs

2. The federal government, through the United States Department of Agriculture, Food and Nutrition Service ("FNS"), administers the Supplemental Nutrition Assistance Program ("SNAP"). SNAP, which was formerly known as the "Food Stamp Program," uses federal tax dollars to subsidize low-income households, affording such households the opportunity to achieve a more nutritious diet by increasing their food-purchasing power.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

3. The federal government also administers the Temporary Aid to Needy Families Program (“TANF”). Eligible recipients (“TANF Recipients”) receive temporary cash assistance funded by federal tax dollars.

4. The New York City Human Resources Administration (“HRA”) administers SNAP and TANF benefits to New York City residents.

5. In New York, individuals who receive SNAP benefits (“SNAP Recipients”) redeem them electronically through the use of what is known as an Electronic Benefits Transfer (“EBT”) card. The SNAP EBT cards operate like debit cards. At the beginning of each month, a SNAP Recipient’s EBT card is credited with a dollar amount of food stamps benefits for that month.

6. The EBT cards are used by SNAP Recipients to purchase eligible food items at retailers that are authorized by FNS to participate in SNAP and have EBT terminals located in the stores. As a purchase is made, the retailer runs the EBT card through the EBT terminal. It is also possible to key in the EBT card number on a keypad at the EBT terminal. SNAP Recipients enter a personal identification number (“PIN”) on a keypad, and the amount of the purchase is deducted from the SNAP Recipient’s EBT card.

7. TANF Recipients similarly receive their benefits through an EBT card that can be used at ATM machines, or through the cash-back function at a store cash register.

8. In order to change the PIN number associated with an EBT card, a SNAP or TANF Recipient must call a hotline and key in their zip code, the last four digits of their Social Security number, and their EBT card number.

9. Since September 21, 2014, Xerox State and Local Solutions, Inc.

(“Xerox”) has been the EBT-processing company in New York for SNAP and TANF benefits.

II. The Defendants’ Scheme to Steal SNAP and TANF Benefits

10. The defendant MAHALIA ABRAHAM is a New York City HRA employee who works as a Community Coordinator for the Office of Research and Program Monitoring. In her job, ABRAHAM has access to the Welfare Management System, a computer system that contains personal information about SNAP and TANF Recipients, including names, dates of birth, and social security numbers.

11. Until recently, the defendant WILLIAM HOPKINS was a janitor at a United States Post Office in Queens, New York.

12. Welfare Management System records show that in or about August 2015, the defendant MAHALIA ABRAHAM accessed the HRA file of a victim referred to here as Jane Doe #1.

13. Jane Doe #1 reported to the relevant authorities that on or about April 3, 2016, \$56 worth of SNAP benefits were withdrawn from her EBT card without her permission. DOI investigators traced the transaction to a Rite Aid in Brooklyn, New York. A Rite Aid rewards card in the name of “Adanna Hopkins” was used during the transaction alongside Jane Doe #1’s EBT card number. The address associated with the “Adanna Hopkins” Rite Aid rewards card is 71 Remsen Avenue, Brooklyn, New York, a residence owned by the parents of the defendant WILLIAM HOPKINS.

14. Based on my participation in this investigation, I am familiar with what the defendant WILLIAM HOPKINS looks like. Surveillance video of the April 3, 2016

transaction obtained from the Rite Aid shows a man who resembles HOPKINS (and who I believe to be HOPKINS) conducting the transaction in which Jane Doe #1's EBT card number was used illicitly.

15. Rite Aid records further show that in or about and between July 2014 and April 2016, 124 other EBT card numbers in the names of John Does #2 through 125 were used in conjunction with Adanna Hopkins' Rite Aid rewards card. Records show that none of these transactions were completed using a physical EBT card; rather, the EBT number and the PIN were both keyed in on the touch pad at the register.

16. Records obtained from Xerox show that in or about and between September 2014 and April 2016, two telephone numbers were used to call the EBT hotline regarding 108 of the 125² stolen EBT card numbers that were used in conjunction with Adanna Hopkins' Rite Aid rewards card. These two phone numbers were 347-661-1907 and 646-245-7583. The investigation has shown that 347-661-1907 is subscribed to the defendant MAHALIA ABRAHAM, and 646-245-7583 is the defendant WILLIAM HOPKINS' phone number.³ I know based on my training and experience that people call the EBT hotline in order to inquire about their EBT card balance or to change their PIN.

² Xerox does not have records relating to the remaining 17 stolen EBT card numbers because those cards were used prior to September 2014, which is when Xerox became the EBT-processing company in New York for SNAP and TANF benefits.

³ Although 646-245-7583 is not subscribed to HOPKINS, the defendant MAHALIA ABRAHAM has stated to me that 646-245-7583 is HOPKINS' phone number and that the phone number's subscriber is one of HOPKINS' girlfriends. In addition, 646-245-7583 is the phone number listed on both HOPKINS' resume and food stamp application, which I have reviewed as part of this investigation.

17. In the records obtained from Xerox, I observed that the phone numbers 347-661-1907 and 646-245-7583 were also used to call the EBT hotline regarding eleven additional EBT cards in the names of John Does #126 through 136. Phone records and transaction histories show that these eleven cards were used to make purchases and withdraw cash at Rite Aid pharmacies and certain bodegas located in Brooklyn, New York.

18. Using a computer system called EPPIC, I confirmed that WILLIAM HOPKINS' phone number, 646-245-7583, had called to change the PIN number for 119 of the stolen EBT cards.⁴

19. I interviewed the defendant MAHALIA ABRAHAM on March 7, 2017.

ABRAHAM stated the following in sum and substance and in part: ABRAHAM used the Welfare Management System to access SNAP and/or TANF Recipients' HRA accounts in order to provide the defendant WILLIAM HOPKINS with the EBT account numbers and the names, dates of birth, and social security numbers of SNAP and/or TANF Recipients who had balances on their account. HOPKINS called the EBT hotline to change the PIN numbers on the accounts. HOPKINS used the EBT accounts to purchase baby formula, which he then sold to bodegas for cash.

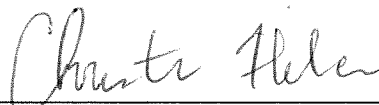
20. After the interview, I showed the defendant MAHALIA ABRAHAM an April 12, 2016 Rite Aid surveillance photograph that depicts one of the illicit transactions. ABRAHAM identified HOPKINS as the person in the photograph.

⁴ EPPIC does not have such records relating to the remaining 17 stolen EBT card numbers because the PIN numbers for those cards were changed prior to September 2014, when Xerox became the EBT-processing company.

21. In total, the defendants MAHALIA ABRAHAM and WILLIAM HOPKINS stole approximately \$52,928.19 in SNAP benefits and \$6,094.05 in TANF benefits, for a total of approximately \$59,022.24.

WHEREFORE, your deponent respectfully requests that the defendants MAHALIA ABRAHAM and WILLIAM HOPKINS be dealt with according to law.

I further request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving the targets an opportunity to flee from prosecution, destroy or tamper with evidence and change patterns of behavior.



Christos Hilas
Assistant Inspector General
New York City Department of Investigation
Office of the Inspector General

Sworn to before me this
28 day of March, 2017



THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK