

UNITED STATES OF AMERICA	:	Crim. No. 16-____ (JBS)
	:	31 U.S.C. § 5324(a)
	:	18 U.S.C. § 1001 & 2
v.	:	
	:	
KIYIA M. HARRIS	:	

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

From on or about June 8, 2012 through on or about June 11, 2012, in Atlantic County, in the District of New Jersey and elsewhere, defendant

did knowingly, and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations issued thereunder, structure, assist in structuring, and attempt to structure and assist in structuring transactions with one or more domestic financial institutions by causing approximately \$17,825.00 in United States currency to be deposited in amounts less than \$10,000.00.

In violation of Title 31, United States Code, Section 5324(a), and Title 18, United States Code, Section 2.

COUNT 2 – False Statements to Federal Law Enforcement Officers
(18 U.S.C. Sections 1001(a)(1) and (2))

On or about December 11, 2014 and December 19, 2014, in Atlantic County, in the District of New Jersey and elsewhere, defendant

KIYIA M. HARRIS

knowingly and willfully, in a matter within the jurisdiction of the executive branch of the Government of the United States, falsified, concealed, and covered up by trick, scheme, and device material facts, and made materially false, fictitious, and fraudulent statements and representations, to wit, defendant KIYIA M. HARRIS participated in two interviews with the Federal Bureau of Investigation (“FBI”), the first at her home in Egg Harbor Township, New Jersey and the second at the FBI’s Office in Northfield, New Jersey, in which she made the following false statements and concealed and covered up facts that were material to an ongoing federal investigation involving allegations of drug trafficking and money laundering, among other potential federal criminal violations:

Specification One – December 11, 2014

During the interview on December 11, 2014, defendant KIYIA M. HARRIS was asked multiple times about whether she deposited cash into her bank accounts. In response, defendant KIYIA M. HARRIS repeatedly falsely stated that she did not ever deposit cash into her bank accounts. In actuality, during the time period from January 8, 2007 through on or about November 26, 2014, defendant KIYIA M. HARRIS deposited approximately \$120,838.07 in cash into the following three bank accounts at TD Bank (formerly Commerce Bank, N.A.): (1) *****8290 opened on September 1, 2001 in the name of KIYIA M. HARRIS; (2) *****7689

opened on June 15, 2007 in the name of KIYIA M. HARRIS and A.R.W., a/k/a "M.W.;" and (3) *****9368 opened on May 2, 2002 in the name of KIYIA M. HARRIS.

Specification Two – December 11, 2014

During the interview on December 11, 2014, defendant KIYIA M. HARRIS was asked multiple times whether she conducted financial transactions with her then paramour, Donell Williams. In response, HARRIS repeatedly denied conducting any financial transactions with Donell Williams, including but not limited to paying bills for Donell Williams and receiving any money from Donell Williams, except the following: (1) HARRIS shared a Discover Card with Donell Williams; (2) HARRIS may have paid for an EZ-Pass account used by Donell Williams but in the name of Donell Williams's father; and (3) HARRIS and Donell Williams operated an internet business identified herein as Business 1, which generated approximately \$12,000.00 in total, none of which was in cash. In actuality, defendant KIYIA M. HARRIS had numerous financial transactions with and on behalf of Donell Williams.

Specification Three – December 11, 2014

During the interview on December 11, 2014, defendant KIYIA M. HARRIS stated that Donell Williams owned a Harley Davidson motorcycle which was located in the shed in her backyard but denied having anything to do with the purchase of Donell Williams' motorcycle. In actuality, defendant KIYIA M. HARRIS paid \$6,500.00 to Harley Davidson of Ocean County on or about February 23, 2012 by check from her TD Bank account *****8290 in partial payment for Donell Williams' 2012 Harley Davidson motorcycle.


Specification Four – December 11, 2014

During the interview on December 11, 2014, defendant KIYIA M. HARRIS denied having any involvement in any financial transactions with Individual 1, an Atlantic County car

dealer. In actuality, on or about August 5, 2011, defendant KIYIA M. HARRIS sold a car to Individual 1 for approximately \$18,000.00. At the request of defendant KIYIA M. HARRIS, Individual 1 wrote two separate sequentially numbered checks -- each dated August 5, 2011 and each for \$9,000 -- to defendant KIYIA M. HARRIS for the proceeds from that transaction. Defendant KIYIA M. HARRIS deposited those checks at separate TD Bank branches on separate dates; that is, HARRIS deposited Check Number 51420 at the TD Bank branch at English Creek, New Jersey on August 19, 2011 and Check Number 51421 at the TD Bank branch in Northfield, New Jersey on August 22, 2011.

Specification Five – December 19, 2014

During the interview on December 19, 2014, defendant KIYIA M. HARRIS again denied receiving cash from Donell Williams or conducting financial transactions with Donell Williams except that: (1) HARRIS put Donell Williams' name on her Discover Card in order to improve his credit after Donell Williams filed for bankruptcy, and Donell Williams paid HARRIS at most \$1,000 in cash for purchases that Donell Williams made with that credit card; (2) HARRIS and Donell Williams jointly owned and operated Business 1; and (3) HARRIS and Donell Williams jointly purchased an antique car which was in HARRIS' name, for which Donell Williams paid HARRIS \$9,000 in cash. In actuality, and as stated above, defendant KIYIA M. HARRIS had numerous additional financial transactions with and on behalf of Donell Williams.



PAUL J. FISHMAN
United States Attorney

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United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

KIYIA M. HARRIS

INFORMATION FOR

31 U.S.C. § 5324(a)

18 U.S.C. § 1001 & 2

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