

Robert L. Boone

Before: THE HONORABLE DEBRA FREEMAN
United States Magistrate Judge
Southern District of New York

- V. -

Defendants.

COUNTY OF OFFENSE:
BRONX

1:5 MAG 2196

(Conspiracy to Commit Bribery)

2. It was a part and an object of the conspiracy

that HARRY FLETCHER, the defendant, an agent, manager, officer, director, representative, and employee of a local government and an agency thereof, to wit, the New York City Human Resources Administration ("HRA"), knowingly and corruptly, would and did solicit and demand for the benefit of a person, and accept and agree to accept, something of value from STANLEY HILL, KAREEM WASHINGTON, JAMES FORD, KENNETH WILLIAMSON, MARSHA RALPH, JASON BRYCE, KEVIN WHYTE, YESENIA VELAZQUEZ, and JOSEPH BULL, the defendants, and others known and unknown, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of such government and agency, involving something of value of \$5,000 and more, said government and agency receiving, in a one-year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance and other form of Federal assistance, in violation of Title 18, United States Code, Section 666(a)(1)(B).

3. It was further a part and an object of the conspiracy that STANLEY HILL, KAREEM WASHINGTON, JAMES FORD, KENNETH WILLIAMSON, MARSHA RALPH, JASON BRYCE, KEVIN WHYTE, YESENIA VELAZQUEZ, and JOSEPH BULL, the defendants, and others known and unknown, knowingly and corruptly would and did give, offer, and agree to give something of value to HARRY FLETCHER, the defendant, with intent to influence and reward an agent, manager, officer, director, representative, and employee of a local government and an agency thereof, to wit, the New York City Human Resources Administration, in connection with a business, transaction, and series of transactions of such government and agency involving something of value of \$5,000 and more, said government and agency receiving, in a one-year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance and other form of Federal assistance, in violation of Title 18, United States Code, Section 666(a)(2).

Overt Acts

4. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, was committed in the Southern District of New York:

a. On or about April 27, 2010, in the Bronx, New York, HARRY FLETCHER, the defendant, confirmed in an internal HRA database that he processed the issuance of SNAP benefits for KAREEM WASHINGTON, the defendant.

b. On or about February 10, 2015, SNAP benefits issued to KAREEM WASHINGTON, the defendant, were used to purchase an item in a grocery store located in Westchester County, New York.

c. On or about April 16, 2010, in the Bronx, New York, HARRY FLETCHER, the defendant, confirmed in an internal HRA database that he processed the issuance of SNAP benefits for JAMES FORD, the defendant.

d. On or about February 17, 2015, SNAP benefits issued to JAMES FORD, the defendant, were used to purchase an item in a grocery store in the Bronx, New York.

e. On or about August 18, 2009, in the Bronx, New York, HARRY FLETCHER, the defendant, confirmed in an internal HRA database that he processed the issuance of SNAP benefits for KENNETH WILLIAMSON, the defendant.

f. On or about December 24, 2014, SNAP benefits issued to KENNETH WILLIAMSON, the defendant, were used to purchase an item in a grocery store in the Bronx, New York.

g. On or about December 29, 2010, in the Bronx, New York, HARRY FLETCHER, the defendant, confirmed in an internal HRA database that he processed the issuance of SNAP benefits for MARSHA RALPH, the defendant.

h. On or about April 7, 2015, SNAP benefits issued to MARSHA RALPH, the defendant, were used to purchase an item in a grocery store in Westchester County, New York.

i. On or about December 7, 2010, in the Bronx, New York, HARRY FLETCHER, the defendant, confirmed in an internal HRA document that he interviewed KEVIN WHYTE, the defendant, in relation to his application for food stamps.

j. On or about April 1, 2015, SNAP benefits issued to KEVIN WHYTE, the defendant, were used to purchase an item in a grocery store in the Bronx, New York.

k. On or about August 12, 2010, in the Bronx, New York, HARRY FLETCHER, the defendant, confirmed in an internal HRA database that he processed the issuance of SNAP benefits for YESENIA VALEZQUEZ, the defendant.

l. On or about April 17, 2015, SNAP benefits

issued to YESENIA VELAZQUEZ, the defendant, were used to purchase an item in a grocery store in the Bronx, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Solicitation and Receipt of Bribes)

5. From at least in or about 2009, up to and including in or about 2015, in the Southern District of New York and elsewhere, during the time when HARRY FLETCHER, the defendant, was an agent, manager, officer, director, representative, and employee of a local government and an agency thereof, to wit, the New York City Human Resources Administration ("HRA"), HARRY FLETCHER knowingly and corruptly solicited and demanded for the benefit of a person, and accepted and agreed to accept, something of value from another person, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of such government and agency, involving something of value of \$5,000 and more, said government and agency receiving, in a one-year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance and other form of Federal assistance, to wit, HARRY FLETCHER, while an agent, manager, officer, director, representative, and employee of HRA, solicited and accepted thousands of dollars in bribes in the Bronx, New York from various persons in exchange for Supplemental Nutrition Assistance Program (formerly known as Food Stamps) benefits for those persons.

(Title 18, United States Code, Section 666(a)(1)(B).)

COUNT THREE

(Honest Services Fraud)

6. From at least in or about 2009, up to and including at least in or about 2015, in the Southern District of New York and elsewhere, HARRY FLETCHER, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud the public of its intangible right to FLETCHER's honest services as an agent, manager, officer, director, representative, and employee of a local government and an agency thereof, to wit, the New York City Human Resources Administration ("HRA"), for the purpose of executing such scheme and artifice and attempting to do so, placed in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service and deposited and

caused to be deposited a matter and thing to be sent and delivered by private and commercial interstate carrier, and took and received therefrom, such matter and thing, and knowingly caused to be delivered by mail and such carrier according to the direction thereon, such matter and thing, to wit, FLETCHER used the power and influence of his official position to obtain for himself thousands of dollars in bribes in exchange for providing Supplemental Nutrition Assistance Program (formerly known as Food Stamps) benefits to various persons.

(Title 18, United States Code, Sections 1341 and 1346.)

COUNT FOUR

(Theft of Government Funds)

7. From at least in or about 2009, up to and including in or about 2015, in the Southern District of New York and elsewhere, HARRY FLETCHER, STANLEY HILL, KAREEM WASHINGTON, JAMES FORD, KENNETH WILLIAMSON, MARSHA RALPH, JASON BRYCE, KEVIN WHYTE, YESENIA VELAZQUEZ, and JOSEPH BULL, the defendants, knowingly and willfully did embezzle, steal, purloin, and convert to their own use and the use of another, vouchers, money and things of value of the United States and a department and an agency thereof, to wit, the United States Department of Agriculture, which exceeded the sum of \$1,000, and did receive, conceal, and retain the same with intent to convert them to their use and gain, knowing them to have been embezzled, stolen, purloined and converted, to wit, the defendants used, and aided and abetted the usage of, fraudulently obtained federally funded Supplemental Nutrition Assistance Program (formerly known as Food Stamps) benefits to purchase food.

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

The bases for my knowledge and for the foregoing charges are, in part, as follows:

8. I am a Special Agent with the Federal Bureau of Investigation and I have been personally involved in the investigation of this matter along with Inspectors General of the New York City Department of Investigation ("DOI"). I have been a Special Agent with the Federal Bureau of Investigation for approximately 8 years. I have experience in fraud and public corruption investigations and techniques associated with such investigations, including wire interceptions, financial analysis, and working with informants.

9. I am familiar with the facts and circumstances set forth below from my participation in the investigation of this matter, from my personal knowledge, and from my conversations with other law enforcement officers, including Inspectors General of the DOI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every fact I have learned during the investigation. Where the actions, statements, and conversations of others are recounted herein, they are related in substance and in part, unless otherwise indicated.

Background

10. Based on my training and experience, my review of documents, and my conversations with others, I have learned the following:

a. The New York City Human Resources Administration ("HRA") is the department of the government of New York City in charge of the majority of the city's social services programs. It provides temporary help to individuals and families with social service and economic needs to assist them in reaching self-sufficiency. Its services include, among other things, providing food stamps to low-income families and individuals. The food stamp program is known as SNAP, which stands for Supplemental Nutrition Assistance Program.

b. Although the food stamp program is administered locally through HRA, SNAP benefits are funded entirely by the federal government. The United States Department of Agriculture provides more than \$3 billion in SNAP benefits to beneficiaries in New York City to purchase food directly from merchants. In addition, the United States Department of Agriculture reimburses HRA, through New York State, for approximately 50 percent of the costs of program administration, including eligibility determination.

c. To apply for SNAP benefits, an applicant must complete and sign an application form listing, among other things, the applicant's name, social security number, date of birth, address, income, and financial assets. The applicant must also provide information pertaining to persons living with the applicant, including whether such persons earn an income.

d. After an applicant has completed an application form and filed it with HRA, he/she is then interviewed by an HRA employee known as an "eligibility specialist." Eligibility

specialists are tasked with determining whether the statements made by an applicant in his/her application are truthful. To that end, in conjunction with interviewing food stamp applicants, eligibility specialists collect and review documents the applicant claims verify the accuracy of the information provided in his/her application.

e. Once an eligibility specialist has finished interviewing an applicant and reviewing all of the documents related to that applicant's application, the specialist indicates on an internal database that he/she has completed those tasks. A supervisory level HRA employee known as a "Principal Administrative Assistant" then reviews the applicant's application and ultimately determines whether that person qualifies for SNAP benefits.

f. To qualify for SNAP benefits administered through HRA, a person must live within the geographic area served by the local department in which they file an application for food stamps and have an annual household income (before taxes) that is less than or equal to a specified amount, given the size of the applicant's household. For example, for a household of one to qualify for SNAP benefits, the gross monthly income for that household must generally not be more than \$1,265.

g. In an effort to assist low-income families and individuals in immediate need of food stamps, HRA provides a way in which applicants can get SNAP Benefits within five days of applying for them. This is called Expedited Processing. A person is eligible for Expedited Processing if (1) he/she is eligible for SNAP benefits and his/her household has less than \$100 in cash or other available resources and will have less than \$150 in gross income during that month in which the applicant applies or (2) if the applicant's combined income and available resources in the month of application are less than the sum of the applicant's rent or mortgage plus heat, utilities and phone, or (3) if at least one person in the applicant's household is a destitute migrant or seasonal farm worker and his/her cash and bank accounts are not more than \$100.

h. Typically, food stamp applicants are automatically considered for Expedited Processing at the time they are interviewed by an eligibility specialist. While interviewing the applicant, the eligibility specialist completes a form known as the SNAP Application Expedited Processing Summary Sheet (the "EP Summary Sheet") for the applicant. On

that form, the eligibility specialist inputs information related to the applicant's finances and indicates whether the applicant is eligible for Expedited Processing. The EP Summary Sheet is then reviewed by a Principal Administrative Assistant who ultimately determines whether an applicant should receive Expedited Processing.

i. Once an applicant is approved for SNAP benefits, expedited or otherwise, he/she will receive the benefits through an Electronic Benefit Transfer (EBT) card. Benefits are automatically loaded into the account associated with the card each month. The card can be used to buy groceries at authorized food stores.

j. SNAP Benefits must be renewed by the recipient approximately every six months. To renew, an applicant must submit a recertification application that requires the applicant to provide much of the same information the applicant was required to submit with his/her initial food stamp application, namely, information regarding the applicant's finances. In addition, the applicant must participate in a recertification interview with an eligibility specialist.

The Scheme

11. Based on my review of documents, my conversations with representatives of DOI and my investigation, I have learned that at all relevant times, HARRY FLETCHER, the defendant, has worked as an eligibility specialist for HRA.

12. As set forth below, the investigation has revealed that since in or about 2009, up to and including in or about 2015, FLETCHER has abused his position by soliciting and accepting cash payments from STANLEY HILL, KAREEM WASHINGTON, JAMES FORD, KENNETH WILLIAMSON, MARSHA RALPH, JASON BRYCE, KEVIN WHYTE, YESNIA VELAZQUEZ, and JOSEPH BULL, the defendants, and others, in exchange for SNAP benefits.

Fletcher Solicits Bribes from CW-1

13. I am familiar with statements made by a witness who has plead guilty to charges related to the instant scheme and entered into a cooperation agreement with the Government in hopes of receiving a sentence reduction in connection with

criminal charges related to his/her role in the instant scheme ("CW-1").¹

14. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that CW-1 has told DOI representatives, among other things, the following, in sum and substance regarding the instant scheme:

a. CW-1 owns two rental properties located in the Bronx, New York ("Property-1" and "Property-2").

b. A few years ago, one of CW-1's tenants from Property-1 informed CW-1 that HARRY FLETCHER, the defendant, could get CW-1 SNAP benefits in exchange for cash.

c. Shortly thereafter, CW-1 contacted FLETCHER and inquired about receiving SNAP benefits. FLETCHER told CW-1, in sum and substance, that he could get CW-1 SNAP benefits, and that he would need CW-1 to give him CW-1's name, social security number, and \$150. FLETCHER told CW-1, in sum and substance, that for \$150, FLETCHER would handle the filing of CW-1's food stamp application and the issuance of an EBT card containing the SNAP benefits, and that CW-1 would need to pay FLETCHER \$100 a month to continually receive benefits on the EBT card. CW-1 agreed to this arrangement and provided FLETCHER with the information he requested and an initial payment of \$150. CW-1 then proceeded to pay FLETCHER \$100 per month.

d. Sometime thereafter, FLETCHER told CW-1, in sum and substance, that if he knew of anyone else who was interested in receiving SNAP benefits, he could get that person benefits as well. FLETCHER told CW-1, in sum and substance, that he would charge that person the same amount of money for the benefits that he had charged CW-1, \$150 to initiate a food stamp application and then \$100 per month to continually receive SNAP benefits, but that CW-1 would have to provide FLETCHER with that person's personal identifying information and collect money from that person to bring to FLETCHER.

e. Subsequently, CW-1 referred at least six people to FLETCHER, including STANLEY HILL, KAREEM WASHINGTON, JAMES FORD, and KENNETH WILLIAMSON, the defendants. CW-1 collected the personal identifying information of approximately five of those individuals, including their names and social security numbers,

¹ Information provided by CW-1 has proven to be reliable and has been corroborated by other evidence

and provided that information to FLETCHER.² In some instances, CW-1 allowed the people he referred to use Property-1 and Property-2 as their home address on their food stamp application, as they did not live in New York City. In those instances, CW-1 would receive the EBT cards issued to those people at Property-1 or Property-2 and then personally deliver the cards to them.

f. CW-1 also collected recurring cash payments from the six people he referred and gave that money to FLETCHER. The payments included the initial \$150 fee FLETCHER charged to initiate a food stamp application and the monthly payments of at least \$100 for a person to continually receive SNAP benefits. CW-1 typically met FLETCHER on or about the fifteenth day of every month near Co-op City in the Bronx to give him the payments CW-1 had collected.

g. In recruiting individuals for FLETCHER, CW-1 made clear that the benefits could only be obtained if regular bribe payments were made to FLETCHER.

15. Based on my conversations with representatives of DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. FLETCHER indicated in an internal HRA database that on or about April 22, 2009, he processed the issuance of expedited SNAP benefits for CW-1.

b. On or about April 24, 2009, an EBT card issued in CW-1's name was mailed to CW-1 at Property-1.

c. From in or about April 2009 to in or about February 2015, a total of approximately \$47,086.49 in SNAP benefits was issued onto CW-1's EBT card.

d. The EBT card issued to CW-1 was used in approximately 600 transactions. A total of approximately \$46,231.24 was spent from the card.

16. Based on my conversations with representatives of

² One of the six individuals CW-1 referred to FLETCHER, KAREEM WASHINGTON, the defendant, met with FLETCHER personally to inquire about receiving SNAP benefits and therefore did not provide CW-1 with his/her personal information.

DOI and my review of documents from the New York State Department of Labor, I have learned, among other things, in substance and in part, that CW-1 was employed from at least in or about April 2009 up until the beginning of 2014.

17. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that CW-1 has told DOI representatives, in sum and substance, that he currently makes approximately \$79,000 a year from his employer.

CW-1 Recruits Stanley Hill into the Scheme

18. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that CW-1 has told DOI representatives, among other things, the following, in sum and substance regarding STANLEY HILL, the defendant:

a. HILL was one of the people CW-1 referred to HARRY FLETCHER, the defendant.

b. A few years ago, CW-1 told HILL that he knew someone who could get him SNAP benefits. CW-1 went on to tell HILL that in order to get the benefits, HILL would need to pay that person \$150 to cover the filing of his food stamp application and the issuance of an EBT card and then \$100 every month to continually receive SNAP benefits on the card. CW-1 also told HILL that he would need to have an address in the Bronx, New York he could claim on his food stamp application as his home address. CW-1 told HILL that he could use Property-1 as his address. It was CW-1's understanding that HILL was not living in New York City at the time.

c. Subsequent to their conversation, HILL gave CW-1 personal identifying information for himself, his wife, and others. HILL told CW-1 that he wanted the card to be issued in his wife's name ("HILL's wife") because she had received food stamps in the past. CW-1 passed the personal identifying information HILL provided CW-1 along to FLETCHER.

d. CW-1 collected \$150 from HILL to pay FLETCHER for his assistance in filing a food stamp application for HILL and ensuring that an EBT card was issued to him. Shortly thereafter, an EBT card was sent to Property-1 in the name of HILL's wife. CW-1 gave the card to HILL.

e. CW-1 proceeded to collect \$150 from HILL on a monthly basis and give it to FLETCHER for the next several years. It was CW-1's understanding that HILL had to pay FLETCHER \$150 a month, instead of \$100 a month, to receive SNAP benefits because HILL claimed that several people lived in his household, which resulted in him receiving a large amount of SNAP benefits.

19. Based on my conversations with representatives of DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. On or about October 8, 2010, FLETCHER confirmed in an internal HRA database that he processed the issuance of expedited SNAP benefits for HILL's wife.

b. On or about October 15, 2010, an EBT card issued in the name of HILL's wife was mailed to Property-1.³

c. From in or about October 2010 to in or about December 2014, a total of approximately \$34,887.49 in SNAP benefits were placed onto the EBT card issued to HILL's wife.

20. Based on my conversations with representatives of DOI and my review of documents from the New York State Department of Labor, I have learned, among other things, in substance and in part, that STANLEY HILL, the defendant, was employed from at least in or about 2009 up until the end of 2014.

21. Based on my conversations with representatives of DOI and my review of certain real estate related property documents, I have learned, among other things, in substance and in part, that STANLEY HILL, the defendant, and HILL's wife own property in Walkill, New York ("Hill Property-1") and have owned that property since in or about 1999.

22. Based on my conversations with representatives of DOI and my review of records from the New York Department of Motor Vehicles ("DMV"), I have learned, among other things, in substance and in part, that according to DMV records, Hill

³ Based on my review of documents from the New York State Office of Information Technology Services and my conversations with representatives of DOI, I have learned, in substance and in part, that another EBT card was issued to HILL's wife on or about December 4, 2014 and mailed to Property-1.

Property-1 is the current home address for both STANLEY HILL, the defendant, and HILL's wife.

23. Based on my conversations with representatives of DOI and my review of documents from HRA, I have learned, among other things, in substance and in part, that STANLEY HILL, the defendant, and HILL's wife, did not qualify to receive SNAP benefits from in or about October 2010 up until the end of 2014, given the amount of income HILL earned during that time period. I have also learned, in substance and in part, that STANLEY HILL, the defendant, and HILL's wife did not qualify for the SNAP benefits they received from in or about October 2010 up until the end of 2015, given that, at minimum, they do not appear to have lived in the geographic area served by the local HRA department in which a food stamp application for HILL's wife was filed.

CW-1 Recruits Kareem Washington into the Scheme

24. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that CW-1 has told DOI representatives, among other things, the following, in sum and substance regarding KAREEM WASHINGTON, the defendant:

a. WASHINGTON was one of the people CW-1 referred to HARRY FLETCHER, the defendant.

b. A few years ago, CW-1 told WASHINGTON that he knew someone named "Harry" who might be able to get him SNAP benefits. CW-1 went on to tell WASHINGTON that in order to get food stamps from "Harry," he would need to pay him \$150 to cover the filing of his food stamp application and the issuance of an EBT card and then \$100 every month to continually receive SNAP benefits on the card. CW-1 also told WASHINGTON that he would need to have an address in the Bronx, New York he could claim on his food stamp application as his home address. It was CW-1's understanding that WASHINGTON was not living in New York City at the time.

c. Sometime thereafter, WASHINGTON told CW-1 that he had met with "Harry" and that he was "good." CW-1 understood this to mean that WASHINGTON had made arrangements with FLETCHER to receive SNAP benefits. Subsequently, FLETCHER told CW-1 that he would need to start collecting \$100 a month from WASHINGTON and giving it to him.

d. CW-1 initially collected \$250 from WASHINGTON and gave it to FLETCHER. It was CW-1's understanding that \$150 of the \$250 he collected from WASHINGTON was to pay FLETCHER for his assistance in filing a food stamp application for WASHINGTON and ensuring that an EBT card was issued to him, while the remaining \$100 was to pay FLETCHER for the monthly benefits placed on the EBT card. CW-1 proceeded to collect \$100 from WASHINGTON on a monthly basis for the next several years, and to distribute these funds to FLETCHER.

25. Based on my conversations with representatives of DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. On or about April 27, 2010, FLETCHER confirmed in an internal HRA database that he processed the issuance of expedited SNAP benefits for WASHINGTON.

b. On or about April 27, 2010, an EBT card issued in WASHINGTON's name was mailed to an address in the Bronx, New York.⁴

c. From in or about April 2010 to in or about February 2015, a total of approximately \$30,981.30 in SNAP benefits was issued onto WASHINGTON's EBT card. The EBT card issued to WASHINGTON was used in approximately 942 transactions. A total of approximately \$30,980.84 was spent from the card.

26. Based on my conversations with representatives of DOI and my review of a certain legal database, I have learned, among other things, in substance and in part, that KAREEM WASHINGTON, the defendant, is listed in that legal database as having lived in White Plains, New York in or about 2009 and 2011. I have also learned, in substance and in part, that KAREEM WASHINGTON, the defendant, is listed in that legal database as having lived in Yonkers, New York in or about 2011 and in White Plains, New York in or about 2015. The database does not list KAREEM WASHINGTON, the defendant, as ever having lived in the Bronx, New York.

⁴ Based on my review of documents from the New York State Office of Information Technology Services and my conversations with representatives of DOI, I have learned, in substance and in part, that three additional EBT cards were issued to KAREEM WASHINGTON, the defendant. Cards were issued to WASHINGTON on or about October 6, 2010, October 16, 2014, and November 20, 2014.

27. Based on my conversations with representatives of DOI and my review of documents from HRA, I have learned, among other things, in substance and in part, that KAREEM WASHINGTON, the defendant, did not qualify for the SNAP benefits he received from in or about April 2010 to in or about February 2015, given that, at minimum, he appears not to have lived in the geographic area served by the local HRA department in which his food stamp application was filed.

CW-1 Recruits James Ford into the Scheme

28. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that CW-1 has told DOI representatives, among other things, the following, in sum and substance regarding JAMES FORD, the defendant:

a. FORD was one of the people CW-1 referred to HARRY FLETCHER, the defendant.

b. Several years ago, CW-1 told FORD that he knew someone who could get him SNAP benefits. CW-1 went on to tell FORD that in order to get the benefits, HILL would need to pay that person \$150 to cover the filing of his food stamp application and the issuance of an EBT card and then \$100 every month to continually receive SNAP benefits on the card. CW-1 also told FORD that he would need to have an address in the Bronx, New York he could claim on his food stamp application as his home address. CW-1 told FORD that he could use an address belonging to CW-1 as his address. It was CW-1's understanding that FORD was living in Queens, New York at the time.

c. Subsequent to their conversation, FORD gave CW-1 personal identifying information for himself, his wife, and his children. CW-1 passed that information along to FLETCHER.

d. CW-1 collected the \$150 from FORD to pay FLETCHER for his assistance in filing a food stamp application for FORD and ensuring that an EBT card was issued to him. Shortly thereafter, an EBT card issued to FORD was sent to Property-2. CW-1 received the card and gave it to FORD. CW-1 proceeded to collect \$100 from FORD on a monthly basis and to distribute these funds to FLETCHER.

29. Based on my conversations with representatives of

DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. On or about April 16, 2010, FLETCHER confirmed in an internal HRA database that he processed the issuance of expedited SNAP benefits for FORD.

b. On or about April 19, 2010, an EBT card issued in FORD's name was mailed to Property-2.⁵

c. From in or about April 2010 to in or about March 2015, a total of approximately \$21,019.88 in SNAP benefits was issued onto FORD's EBT card. The EBT card issued to FORD was used in approximately 303 transactions. A total of approximately \$20,158.73 was spent from the card.

30. Based on my conversations with representatives of DOI and my review of documents from the New York State Department of Labor, I have learned, among other things, in substance and in part, that FORD was employed the majority of the time in which he used the EBT issued to him.

31. Based on my conversations with representatives of DOI and my review of a certain legal database, I have learned, among other things, in substance and in part, that JAMES FORD, the defendant, is listed in that legal database as having lived in Queens, New York in or about 2005, 2012, and 2015. The database does not list JAMES FORD, the defendant, as ever having lived in the Bronx, New York.

32. Based on my conversations with representatives of DOI and my review of documents from HRA, I have learned, among other things, in substance and in part, that JAMES FORD, the defendant, did not qualify to receive SNAP benefits from in or about 2010 to in or about March 2015, given the amount of income FORD earned during that time period.

33. Based on my conversations with representatives of DOI and my review of documents from HRA, I have learned, among other things, in substance and in part, that JAMES FORD, the defendant, did not qualify for the SNAP benefits he received

⁵ Based on my review of documents from the New York State Office of Information Technology Services and my conversations with representatives of DOI, I have learned, in substance and in part, that three additional EBT cards were issued to JAMES FORD, the defendant. Cards were issued to FORD on or about October 29, 2010, November 5, 2010, and March 14, 2014.

from in or about April 2010 to in or about March 2015, given that, at minimum, he appears not to have lived in the geographic area served by the local HRA department in which his food stamp application was filed.

CW-1 Recruits Kenneth Williamson into the Scheme

34. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that CW-1 has told DOI representatives, among other things, the following, in sum and substance regarding KENNETH WILLIAMSON, the defendant:

a. WILLIAMSON was one of the people CW-1 referred to HARRY FLETCHER, the defendant.

b. Several years ago, CW-1 told WILLIAMSON that he knew someone who could get him SNAP benefits. CW-1 went on to tell WILLIAMSON that in order to get the benefits, WILLIAMSON would need to pay that person \$150 to cover the filing of his food stamp application and the issuance of an EBT card and then \$100 every month to continually receive SNAP benefits on the card. CW-1 also told WILLIAMSON that he would need to have an address in the Bronx, New York he could claim on his food stamp application as his home address. CW-1 told WILLIAMSON that he could use a Bronx address belonging to CW-1.

c. Subsequent to their conversation, WILLIAMSON gave CW-1 personal identifying information for himself. CW-1 passed that information along to FLETCHER.

d. CW-1 collected \$150 from WILLIAMSON to pay FLETCHER for his assistance in filing a food stamp application for WILLIAMSON and ensuring that an EBT card was issued to him. Shortly thereafter, an EBT card issued to WILLIAMSON was sent to an address in the Bronx. CW-1 proceeded to collect \$100 from WILLIAMSON on a monthly basis.

35. Based on my conversations with representatives of DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. On or about August 18, 2009, FLETCHER confirmed in an internal HRA database that he processed the issuance of expedited SNAP benefits for WILLIAMSON.

b. On or about August 24, 2009, an EBT card issued in WILLIAMSON's name was mailed to an address in the Bronx, New York.⁶

c. From in or about August 2009 to in or about March 2015, a total of approximately \$19,884.44 in SNAP benefits was issued onto WILLIAMSON's EBT card. The EBT card issued to WILLIAMSON was used in approximately 352 transactions. A total of approximately \$18,803.68 was spent from the card.

36. Based on my conversations with representatives of DOI and my review of a certain legal database, I have learned, among other things, in substance and in part, that KENNETH WILLIAMSON, the defendant, is listed in that legal database as having lived in Middletown, New York in or about 2009, and Yonkers, New York in or about 2011.

37. Based on my conversations with representatives of DOI and my review of documents from HRA, I have learned, among other things, in substance and in part, that KENNETH WILLIAMSON, the defendant, did not qualify for the SNAP benefits he received from in or about August 2009 to in or about March 2015, given that, at minimum, he appears not to have lived in the geographic area served by the local HRA department in which his food stamp application was filed.

Fletcher Solicits Bribes from CW-2

38. Based on my conversations with representatives of DOI, I have learned that during the course of this investigation, DOI representatives have worked with a witness who has plead guilty to charges related to the instant scheme and has entered into a cooperation agreement with the Government in hopes of receiving a sentence reduction in connection with criminal charges related to his/her role in the instant scheme ("CW-2"). I have also learned from DOI representatives that CW-2 has proven reliable and trustworthy and information CW-2 has provided has been corroborated by independent evidence.

39. Based on my conversations with representatives of

⁶ Based on my review of documents from the New York State Office of Information Technology Services and my conversations with representatives of DOI, I have learned, in substance and in part, that four additional EBT cards were issued to KENNETH WILLIAMSON, the defendant. Cards were issued to WILLIAMSON on or about March 4, 2011, March 23, 2012, June 29, 2012, and September 9, 2013. The cards issued to WILLIAMSON on March 23, 2012, June 29, 2012, and September 9, 2013 were mailed to Property-2.

DOI and my review of relevant notes and reports, I have learned that CW-2 has told DOI representatives, among other things, the following, in sum and substance regarding the instant scheme:

a. CW-2 owns a rental property in the Bronx ("Property-3") and lives in a separate property in the Bronx ("Property-4").

b. In or about 2010, CW-2 went with one of CW-2's tenants ("UF-1") to an HRA center in the Bronx where people can apply for SNAP benefits, as well as other social services. CW-2 had gone to the center to apply for an emergency assistance program known as the "One Shot Deal." While at the center, UF-1 introduced CW-2 to HARRY FLETCHER, the defendant. UF-1 told CW-2, in sum and substance, that FLETCHER helps people get food stamps. Subsequently, CW-2 gave FLETCHER documents CW-2 had brought with him/her to use in applying for the One Shot Deal. The documents contained personal information about CW-2. After receiving the documents, FLETCHER told CW-2, in sum and substance, that he would call UF-1 to let CW-2 know whether he was able to get CW-2 SNAP benefits.

c. Shortly thereafter, CW-2 received a phone call from UF-1 telling CW-2 that FLETCHER was currently in her apartment at Property-3. CW-2 then went to Property-3 to meet FLETCHER. During their meeting, FLETCHER told CW-2 that his/her food stamp application had been approved. CW-2 inquired as to how that had happened, and FLETCHER responded, in sum and substance, "I've been at [HRA] 20 years, I'm the man." CW-2 questioned FLETCHER whether it was guaranteed that he would receive SNAP benefits, to which FLETCHER replied, in sum and substance, "I've been rocking this for years." FLETCHER went on to tell CW-2 that CW-2 would receive an EBT card containing the SNAP benefits in a few days and that he owed him \$200 for his help. CW-2 paid FLETCHER \$200 in cash. Shortly thereafter, CW-2 received an EBT card in the mail.

d. Approximately six months later, CW-2 received a letter from HRA informing CW-2 that his/her food stamp application needed to be recertified. CW-2 called FLETCHER asking him what CW-2 should do about the letter. FLETCHER told CW-2, in sum and substance, that he would have to submit another food stamp application for CW-2, for CW-2 to continue receiving SNAP benefits. FLETCHER went on to tell CW-2, in sum and substance, that every time he had to recertify CW-2's application, CW-2 would need to pay him money, unless CW-2 connected FLETCHER with other people willing to pay him cash in

exchange for SNAP benefits. FLETCHER told CW-2, in sum and substance, that even if a person was employed and made \$100,000 a year, he could get that person SNAP benefits. FLETCHER said, in sum and substance, that his supervisor was "mad cool [and] would sign anything," and that for each person CW-2 referred, CW-2 would just need to give FLETCHER a copy of that person's social security card, driver's license, and pay stub. CW-2 asked FLETCHER, in sum and substance, if referring people who lived outside of the state of New York would be an issue. FLETCHER indicated that that was not an issue and that he had helped people in the past who did not live in the state of New York.

e. Subsequently, CW-2 referred approximately 20 people to FLETCHER, including MARSHA RALPH, JASON BRYCE, and KEVIN WHYTE. FLETCHER gave CW-2 food stamp applications to distribute to those people and told CW-2 to have the applicants fill out certain portions of the application, but to leave questions about their income blank. Once the applicants completed their application forms, CW-2 gave the applications to FLETCHER. CW-2 also collected copies of the applicants' social security cards, driver's licenses, and pay stubs, as FLETCHER had instructed CW-2 to do, and gave those documents to FLETCHER. In some instances, CW-2 allowed the people he referred to use addresses associated with him as their home address on their food stamp application, as they did not live in New York City. In those instances, CW-2 would receive the applicant's EBT card at one of his residences and give it to the applicant in person.

f. CW-2 also collected cash payments from the individuals he recruited and provided those payments to FLETCHER. Initially, the applicants CW-2 recruited paid FLETCHER \$200 every six months. However, overtime the payments paid by the recruits dropped to \$150 every six months, and then to \$150 once a year. CW-2 typically met FLETCHER at CW-2's residence in the Bronx to give him the payments. On at least one such occasion, FLETCHER told CW-2, in sum and substance, that his supervisor had come to CW-2's house with him and was waiting for him outside in his car.

40. Based on my conversations with representatives of DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. On or about August 11, 2010, an EBT card containing SNAP benefits was mailed to CW-2 at Property-3.

b. From in or about August 2010 to in or about March 2015, a total of approximately \$10,421 in SNAP benefits was issued onto CW-2's EBT card.

c. The EBT card issued to CW-2 was used in approximately 176 transactions. A total of approximately \$9,924.31 was spent from the card.

CW-2 Recruits Marsha Ralph and Jason Bryce into the Scheme

41. Based on my conversations with representatives of DOI, I have learned that CW-2 has told DOI representatives, among other things, the following, in sum and substance regarding MARSHA RALPH, the defendant:

a. RALPH was one of the people CW-2 referred to HARRY FLETCHER, the defendant. RALPH was a former tenant of CW-2 and the girlfriend of an associate of CW-2, JASON BRYCE, the defendant.

b. A few years ago, CW-2 told JASON BRYCE, the defendant, that CW-2 knew someone who could help people get SNAP benefits in exchange for money. BRYCE expressed interest in getting benefits for his girlfriend, MARSHA RALPH, the defendant. Subsequently, CW-2 gave BRYCE a food stamp application and told BRYCE to fill out certain portions of the form, although not the portions requiring the applicant to list his/her income, and to give CW-2 a copy of RALPH's social security card and driver's license.

c. Sometime thereafter, RALPH told CW-2, in sum and substance, that she had a Connecticut driver's license and asked whether that was going to hurt her chances of getting food stamps. CW-2 told RALPH that having an out of state driver's license would not pose a problem for her getting SNAP benefits. JASON BRYCE, the defendant, then asked CW-2, in sum and substance, if he and RALPH could list an address in the Bronx associated with CW-2 as RALPH's home address. CW-2 indicated that that was fine. CW-2 then received RALPH's personal identifying information and application and gave it to FLETCHER.

d. CW-2 also collected money from both JASON BRYCE and MARSHA RALPH, the defendants, to pay FLETCHER for his assistance in filing a food stamp application for RALPH and ensuring that an EBT card was issued to her. CW-2 collected about two payments of approximately \$200 from BRYCE, and about two

payments of approximately \$200 from RALPH. CW-2 kept a portion of the payments for CW-2 and gave the rest to FLETCHER.

42. Based on my conversations with representatives of DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. On or about December 29, 2010, FLETCHER confirmed in an internal HRA database that he processed the issuance of expedited SNAP benefits for RALPH.

b. On or about January 7, 2011, an EBT card issued in RALPH's name was mailed to Property-3.⁷

c. From in or about December 2010 to in or about April 2015, a total of approximately \$28,930.49 in SNAP benefits was issued onto RALPH's EBT card. The EBT card issued to RALPH was used in approximately 785 transactions. All of the money on the card was spent.

43. Based on my conversations with representatives of DOI and my review of documents from the New York State Department of Labor, I have learned, among other things, in substance and in part, that RALPH was employed the majority of the time in which she used the EBT card issued to her.

44. Based on my conversations with representatives of DOI and my review of a certain legal database, I have learned, among other things, in substance and in part, that MARSHA RALPH and JASON BRYCE, the defendants, are listed in that legal database as having lived in Bridgeport, Connecticut in or about 2014, and New Rochelle, New York in or about 2015, at the same address.

45. Based on my conversations with representatives of DOI and my review of documents from HRA, I have learned, among other things, in substance and in part, that MARSHA RALPH and JASON BRYCE, the defendants, did not qualify for the SNAP benefits they received from in or about December 2010 to in or about April 2015, given that they appear not to have lived in

⁷ Based on my review of documents from the New York State Office of Information Technology Services and my conversations with representatives of DOI, I have learned, in substance and in part, that five additional EBT cards were issued to RALPH, the defendant. Cards were issued to RALPH on or about May 8, 2012, May 15, 2012, June 4, 2014, June 27, 2014, and July 9, 2014.

the geographic area served by the local HRA department in which RALPH's food stamp application was filed.

CW-2 Recruits Kevin Whyte into the Scheme

46. Based on my conversations with representatives of DOI, I have learned that CW-2 has told DOI representatives, among other things, the following, in sum and substance regarding KEVIN WHYTE, the defendant:

a. WHYTE was one of the people CW-2 referred to HARRY FLETCHER, the defendant. WHYTE is a relative of CW-2.

b. Several years ago, CW-2 had a conversation with WHYTE about how he knew someone who could help people get SNAP benefits in exchange for money. WHYTE expressed interest in participating in the scheme. Subsequently, CW-2 gave WHYTE a food stamp application and told him that he would need to provide CW-2 with a copy of his driver's license. WHYTE filled out certain portions of the form, signed it, and gave it to CW-2, who in turn gave it to FLETCHER.

c. CW-2 also collected money from WHYTE to pay FLETCHER for his assistance in filing a food stamp application for WHYTE and ensuring that an EBT card was issued to him. CW-2 recalls WHYTE paying him approximately \$150 on two or three different occasions. CW-2 took that money and gave it to FLETCHER.

47. Based on my conversations with representatives of DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. On or about December 7, 2010, FLETCHER confirmed on an EP Summary Sheet that he interviewed WHYTE to determine if he qualified for Expedited Processing.

b. On or about December 15, 2010, an EBT card issued in WHYTE's name was mailed to Property-4.

c. From in or about December 2010 to in or about April 2015, a total of approximately \$25,529.67 in SNAP benefits was issued onto WHYTE's EBT card. The EBT card issued to WHYTE was used in approximately 687 transactions. A total of approximately \$25,023.99 was spent on the card.

48. Based on my conversations with representatives of DOI and my review of a certain legal database, I have learned, among other things, in substance and in part, that KEVIN WHYTE, the defendant, is listed in that legal database as having lived in Wappingers Falls, New York in or about 2008, 2013, and 2015. The database does not list WHYYTE as ever having lived in the Bronx, New York.

49. Based on my conversations with representatives of DOI and my review of documents from HRA, I have learned, among other things, in substance and in part, that KEVIN WHYTE, the defendant, did not qualify for the SNAP benefits he received from in or about December 2010 to in or about April 2015, given that he does not appear to have lived in the geographic area served by the local HRA department in which his food stamp application was filed.

Fletcher Solicits Bribes from Yesenia Velazquez and Joseph Bull

50. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that YESENIA VELAZQUEZ, the defendant, has told investigators the following, among other things, in sum and substance regarding her role in the scheme:

a. A few years ago, VALEZQUEZ's boyfriend, JOSEPH BULL, the defendant, informed her that he had met someone named "Fletch" who said that he could help BULL get food stamps.

b. Subsequently, "Fletch" advised VELAZQUEZ on how to fill out a food stamp application. "Fletch" told her, in sum and substance, that she should not answer questions regarding her income but just fill out the first page of the application and sign the last page. VELAZQUEZ ultimately complied with the instructions given to her by "Fletch" and received SNAP benefits.

51. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that JOSEPH BULL, the defendant, told investigators, among other things, that BULL and VALEZQUEZ gave "Fletch" \$100 every time VALEZQUEZ's food stamp application needed to be recertified, which was approximately once or twice a year.

52. Based on my conversations with representatives of

DOI and my review of documents from HRA and the New York State Office of Information Technology Services, I have learned, among other things, in substance and in part, the following:

a. On or about August 12, 2010, FLETCHER confirmed in an internal HRA database that he processed the issuance of expedited SNAP benefits for VALEZQUEZ.⁸

b. From in or about August 2010 to in or about April 2015, a total of approximately \$35,000 in SNAP benefits was issued onto VALEZQUEZ's EBT card.

53. Based on my conversations with representatives of DOI and my review of documents from the New York State Department of Labor, I have learned, among other things, in substance and in part, that YESENIA VELAZQUEZ, the defendant, was employed at least from in or about 2009 up until the end of 2014.

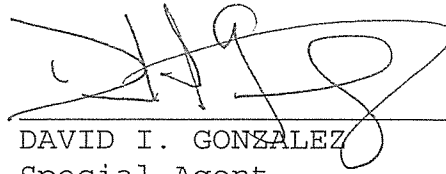
54. Based on my conversations with representatives of DOI and my review of relevant notes and reports, I have learned that YESENIA VELAZQUEZ, the defendant, has told investigators, in sum and substance, that she is currently employed by the New York City Health and Hospital Corporation.

55. Based on my conversations with representatives of DOI and my review of documents from HRA, I have learned, among other things, in substance and in part, that YESENIA VALZQUEZ, the defendant, did not qualify to receive SNAP benefits from in or about 2010 to in or about April 2015, given the amount of income VELAZQUEZ earned during that time period.

WHEREFORE, deponent prays that a warrant be issued for the arrest of HARRY FELTCHER, STANLEY HILL, KAREEM WASHINGTON, JAMES FORD, KENNETH WILLIAMSON, MARSHA RALPH, JASON BRYCE, KEVIN WHYTE, and YESENIA VELAZQUEZ, and JOSEPH BULL, the defendants,

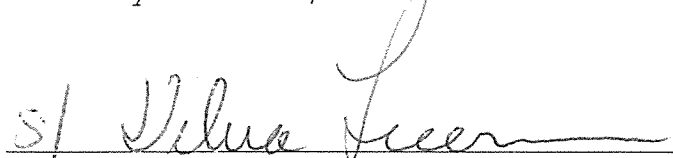
⁸ VALEZQUEZ was already in possession of an EBT card prior to her meeting FLETCHER as she had previously qualified for SNAP benefits. Thus, it was unnecessary for a new card to be issued to her.

and that they be arrested and imprisoned or bailed as the case may be.



DAVID I. GONZALEZ
Special Agent
Federal Bureau of Investigation

Sworn to before me on the
24TH day of June, 2015,



THE HONORABLE DEBRA FREEMAN
United States Magistrate Judge
Southern District of New York