

authorized depositories of mail matter, and did buy, receive, and conceal, and unlawfully did have in their possession, letters, postal cards, packages, bags, and mail, and articles and things contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, CARSON and BROWN stole and obtained mail out of United States mail boxes.

(Title 18, United States Code, Sections 1708 and 2.)

COUNT TWO

(Stolen or Reproduced Keys or Locks)

2. On or about April 20, 2018, in the Southern District of New York, STEVEN CARSON, the defendant, knowingly did steal, purloin, embezzle, and obtain by false pretense a key suited to a lock adopted by the Post Office Department and the Postal Service and in use on the mails and bags thereof, and a key to a lock box, lock drawer, and other authorized receptacle for the deposit and delivery of mail matter; and knowingly and unlawfully did make, forge, and counterfeit a key, and did possess such mail lock and key with the intent unlawfully and improperly to use, sell, and otherwise dispose of the same, and to cause the same to be unlawfully and improperly used, sold, and otherwise disposed of, to wit, CARSON used a stolen mail box key to steal mail from the United States Postal Service.

(Title 18, United States Code, Section 1704.)

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

3. I am a Postal Inspector with the USPSIS and I have been involved in the investigation of this matter. My duties and responsibilities include the investigation of mail theft, among other crimes. I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents and victims, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. The USPSIS has been investigating the theft of mail in and around Westchester County, New York since in or

about January 1, 2018. Specifically, USPIS agents have been investigating the theft of Postal Service keys and mail from Postal Service boxes in Eastchester, Yonkers, Hastings, Tuckahoe, and Bronxville during this time period. During the course of this investigation, I have spoken with a detective ("Detective-1") from the Town of the Eastchester Police Department ("EPD"). Detective-1 told me that he spoke to an officer at the EPD ("Officer-1") who, together with other EPD officers, recovered a bag of stolen mail from a car driven by STEVEN CARSON, the defendant, with DEREK BROWN, the other defendant, sitting in the passenger seat. I also spoke with a Special Agent with the United States Postal Service Office of Inspector General ("Agent-1"), who interviewed multiple victims of the mail theft described herein. I have also spoken with victims, and reviewed law enforcement reports, surveillance videos, bank records, and other evidence.

5. I have reviewed EPD reports of an incident that occurred on April 20, 2018, and spoken to Detective-1 who, in turn, had spoken with Officer-1 about the incident. I have learned that on that day, a silver 1998 Mercedes Benz ("Vehicle-1") was idling near a mail box on the corner of Brook Street and Ewart Street in Eastchester, New York. Officers from the EPD approached Vehicle-1. After the officers requested identification, the individuals in the vehicle handed over drivers licenses. There were two individuals identified: STEVEN CARSON, the driver, and DEREK BROWN, a passenger, the defendants. The officers then requested and obtained consent to search a black bag lying on the back seat of the vehicle. One of the officers asked what was in the bag, to which CARSON replied, "Officer, I didn't do anything wrong." When Officer-1 opened the black bag, he found various envelopes with stamps on them. Officer-1 then asked CARSON to turn the vehicle off. At this point, CARSON drove forward and he and BROWN fled from the scene. They were not thereafter arrested. The black bag contained mail from victims from Eastchester, Bronxville, Yonkers, Hastings, and Tuckahoe. In the total, the bag contained more than \$66,000 in stolen checks and money orders that were placed in the mail.

6. I reviewed Department of Motor Vehicle ("DMV") records for Vehicle-1 and learned that the car is registered to the father of STEVEN CARSON ("Individual-1"), the defendant. A black 2002 BMW ("Vehicle-2") is also registered to the same individual.

7. After the April 20, 2018 incident, the Bronxville Police Department provided me with video surveillance footage from several different dates depicting an individual believed to be STEVEN CARSON, the defendant, opening locked Postal Service boxes and stealing mail in Bronxville. The video surveillance captured both Vehicle-1 and Vehicle-2 being utilized during the thefts.

a. Specifically, surveillance footage from on or about April 18, 2018 shows Vehicle-2 approach a Postal Service box in Bronxville and a man matching CARSON's physique exit the vehicle, open the locked box, and retrieve mail. The surveillance footage captured the license plate of the vehicle, which matched the license plate for Vehicle-2.

b. I also reviewed surveillance footage from on or about April 19, 2018, which shows Vehicle-1 approach the same Postal Service box and a man matching CARSON's physique exit the vehicle, open the locked box, and retrieve mail. The surveillance footage captured the license plate of the vehicle, which matched the license plate for Vehicle-1.

c. Similarly, surveillance footage from on or about April 20, 2018 – the morning of the car stop in Eastchester – shows Vehicle-1 approach another Postal Service box on the same street. During the subsequent car stop, mail from this Postal Service box was recovered from the bag in the vehicle with CARSON and DEREK BROWN, the defendants.

d. I also reviewed surveillance footage from Bronxville, New York from on or about May 4, 2018, which portrays a man matching CARSON's physique exit the vehicle, open a locked mail box, and retrieve mail. The surveillance footage also captured the license plate of the vehicle, which matched the license plate for Vehicle-2.

e. In each of the surveillance videos from April 2018, the individual exiting the vehicle is wearing a black coat and a unique pair of black pants with a white stripe along the left side. I also reviewed a photo retrieved from CARSON's public Facebook profile where he appears to be wearing identical pants. In the surveillance footage captured on May 4, 2018, CARSON is wearing a New York Mets jersey and blue pants. In a photo retrieved from CARSON's public Instagram profile, he is wearing an identical jersey and pants. The Instagram photo was posted on May 4, 2018.

8. On or about June 11, 2018, Agent-1, a Special Agent with the United States Postal Service Office of Inspector General, spoke to an individual ("Victim-1") who mailed a \$100 Gap gift card (the "Gap Gift Card") at approximately 11:00 AM from inside the Bronxville Post Office on or about April 2, 2018. According to Victim-1, the Gap Gift Card never reached its intended recipient.

9. On or about April 12, 2018, Agent-1 obtained surveillance footage from the Gap store in Yonkers, New York from the time the Gap Gift Card was redeemed at the store. Based on my conversation with Agent-1, I learned that the Gap Gift Card was redeemed at approximately 5:38PM on the same day that the Bronxville victim mailed the card, April 2, 2018. I reviewed stills from the surveillance footage, which show an individual matching the defendant DEREK BROWN's physique at the Gap store. The individual is wearing a unique black coat with two black stripes at the bottom and hat with a "W" logo. I also reviewed photos retrieved from Facebook, which show BROWN wearing an identical coat and an identical hat.

10. On or about April 27, 2018, I spoke to an individual ("Victim-2") who reported that a money order he purchased for \$400 ("Money Order-1") was missing. I learned from Victim-2 that Money Order-1 was placed in a mail box located on South Broadway in Yonkers, New York. I also reviewed records from Chase Bank which show that Money Order-1 was deposited into a Chase Bank account in the name of DEREK BROWN, the defendant, on or about April 4, 2018. The name on the deposited money order was "Derek Brown" with an address in Yonkers, New York (the "Yonkers Address"). I reviewed DMV records which list BROWN's address as the Yonkers Address.

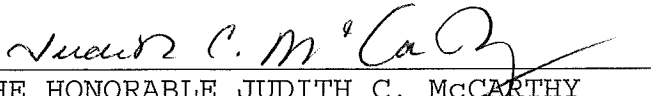
11. On or about May 4, 2018, I spoke to another victim ("Victim-3") who reported that a money order for \$1,000 ("Money Order-2") was missing. According to Victim-3, Money Order-2 was mailed from the Yonkers South Post Office in Yonkers, New York. I reviewed records from Chase Bank which show that Money Order-2 was deposited into a Chase Bank account in the name of DEREK BROWN, the defendant, on or about April 4, 2018. The name on the deposited money order was also "Derek Brown" with the Yonkers Address. I also reviewed surveillance footage from the Chase Bank in Yonkers, which shows STEVEN CARSON, the defendant, depositing Money Order-2 into the Bank's ATM machine on or about April 4, 2018.

WHEREFORE, the deponent respectfully requests that warrants be issued for the arrests of STEVEN CARSON and DEREK BROWN, the defendants, and that they be imprisoned, or bailed, as the case may be.



POSTAL INSPECTOR MICHAEL MEMOLI
United States Postal
Inspection Service

Sworn to before me this
27th day of June, 2018



THE HONORABLE JUDITH C. MCCARTHY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK