



COUNT TWO

**(False Information and Hoaxes)**

2. On or about December 5, 2019, in the Southern District of New York and elsewhere, AMEEN KESHAVJEE, the defendant, knowingly engaged in conduct with intent to convey false and misleading information, under circumstances where such information might reasonably be believed, and where such information indicated that an activity had taken, was taking, or would take place that would constitute a violation of Chapters 10 and 113B of Title 18, United States Code, to wit, KESHAVJEE mailed a note stating "It[']s called ant[h]rax. Enjoy," along with a white powdery substance to Employee-1 at the Bar, and the substance subsequently tested negative for anthrax.

(Title 18, United States Code, Sections 1038(a)(1) and 2.)

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

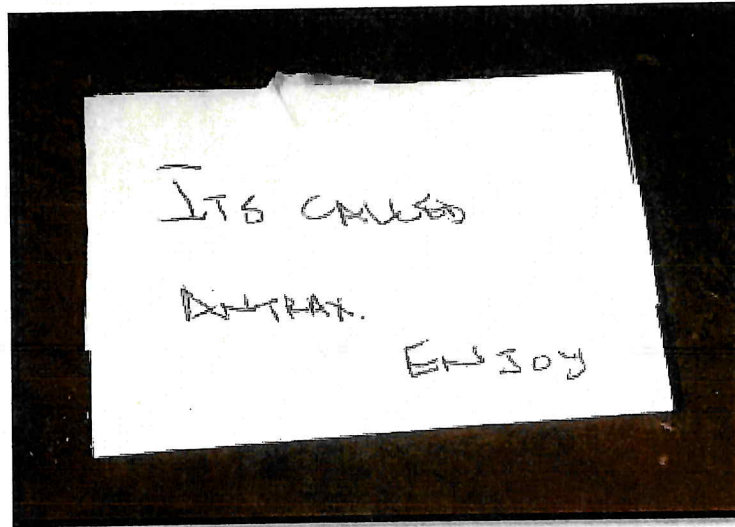
3. I am a Postal Inspector with the United States Postal Inspection Service, and I have been involved in the investigation of AMEEN KESHAVJEE, the defendant. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement officers, witnesses, and others, as well as my examination of reports, records, and physical evidence. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of 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. As further detailed below, AMEEN KESHAVJEE, the defendant, mailed an envelope with a white powdery substance and a note indicating that the substance was anthrax to an employee at a Manhattan bar.

5. On or about December 9 and December 18, 2019, I interviewed Employee-1 at the Bar. Employee-1 told me, in sum and substance, the following:

a. On or about December 9, 2019, Employee-1 opened an envelope (the "Envelope") that had arrived in the mail addressed to Employee-1 at the Bar. The Envelope included a white

powdery substance (the "White Powder") and a note (the "Note"), depicted below, indicating that the White Powder was anthrax.



b. After opening the Envelope, Employee-1 called 911, and law enforcement agents and paramedics responded to the Bar.

c. AMEEN KESHAVJEE, the defendant, is a former patron of the Bar who had previously corresponded via email with Employee-1 using a particular email address (the "Keshavjee Email Address").

d. In or about February 2019, Employee-1 told KESHAVJEE that if he continued sending messages to Employee-1's private email address, he would no longer be welcome at the Bar. At around the same time, in or about February 2019, KESHAVJEE ceased coming to the Bar and Employee-1 began receiving threatening messages (the "Messages") on his private email account from the Keshavjee Email Address.

6. Based on my review of the Messages, which I obtained from Employee-1, I know, among other things, the following:

a. The Keshavjee Email Address contains the word "Ameen" -- the first name of AMEEN KESHAVJEE, the defendant.

b. In addition to addressing Employee-1, some of the Messages were directed at Employee-1's partner ("Employee-1's Partner") and two other employees at the Bar ("Employee-2" and "Employee-3").

c. On or about February 25, 2019, Employee-1 received an email from the Keshavjee Email Address, which included the following text:

After the way you 3 shits repeatedly harassed, bullied and intimidated me YOU LOW-LEVEL HUMAN garbage decide that **\*\*I\*\*** crossed a line???? DIE OF AIDS, you leftie, hypocrite, democrat-voting FUCKS!!!!!!!!!! [Employee-1]: I sincerely hope [Employee-1's Partner] gives it to you, you fucking disgrace to the planet! I will be there to pe[e] on your individual coffins!

d. On or about February 27, 2019, Employee-1 received an email from the Keshavjee Email Address, which included the following text: "You miserable fag shit. U r a coward, picking on the quietest person in the shop. I hope [Employee-1's Partner] gives u AIDS. I miss my little spot. You fuck."

e. On or about March 2, 2019, Employee-1 received an email from the Keshavjee Email Address, which included the following text: "You miserable, pinch-faced fag shit. U r a coward, picking on the quietest person in the shop. I hope [Employee-1's Partner] gives u AIDS, AND that you get terminal cancer on top of that. I miss my quiet little spot, you fuck. You are a DISGRACE to the Maple Leaf! Hope [Employee-2 and Employee-3] die with you, you shit!!!"

f. On or about March 13, 2019, Employee-1 received an email from the Keshavjee Email Address that was signed "Ameen Keshavjee". The email's subject line read, "What A Shame!!!" and included the following text:

That you three weren't on that plane the [sic] fell out of the sky in Ethiopia: 3 fewer judgemental [sic] liberals would be SO nice. (Most of those chaps were aid workers of some sort... The left wing, you know. SOCIALISM. "Vote Democrat" you said, you miserable, liberal, judgemental [sic] human shit.) I hope you 3 die of AIDS soon so that I can get back to my quiet little corner. Please co-operate, you miserable, judgemental [sic], pinch-faced cunts. Good afternoon. A.

g. On or about April 2, 2019, Employee-1 received an email from the Keshavjee Email Address stating the following:

I would LOVE to attend a funeral featuring you 3 pieces of HUMAN SHIT!!!! A. Are u fucking bullying 3 dead yet? Please reply YES! You in particular, [Employee-1], are a hateful, spiteful, bullying, discriminatory, racist, human shit. Get AIDS or cancer and DIE: you, [Employee-2 and Employee-3]!!!! Leave us quiet people in peace, you human shits! Peace and quiet. A.

h. On or about May 25, 2019, Employee-1 received an email from the Keshavjee Email Address, which included the text: "I hope u get AIDS and die."

7. Based on my training, experience, and involvement in this investigation, and my examination of the Envelope, the White Powder, and the Note, I know, among other things, the following:

a. The postmark -- a mark imposed on the Envelope by USPS -- indicated that the Envelope was mailed to the Bar on or about December 5, 2019.

b. The stamp used to mail the Envelope (the "Stamp") is a particular type of stamp that can only be purchased with a debit or credit card.

8. Based on my review of United States Postal Service ("USPS") retail records for the Stamp, I know that the Stamp was purchased on or about November 25, 2019, at approximately 2:02 p.m., at a self-service kiosk in the United States Post Office Times Square Station in Manhattan (the "Post Office"). I also know that the Stamp was purchased using a J.P. Morgan Chase ("Chase") credit card ending with the numbers 9104 (the "Credit Card").

9. Based on my review of records obtained from Chase, I know, among other things, the following:

a. The subscriber for the Credit Card is AMEEN KESHAVJEE, the defendant.

b. The Credit Card was used for an \$11.55 purchase at a "USPS KIOSK" in Manhattan, New York on or about November 25, 2019.

c. Between at least in or about 2016 and in or about February 2019, the Credit Card was used to make regular payments at the Bar. The Credit Card ceased being used at the Bar in or about February 2019.

10. Based on, among other things, my comparison of security footage from the Post Office captured on November 25, 2019, at the approximate time of the purchase of the Stamp, to an image of AMEEN KESHAVJEE, the defendant, that I obtained from the New York State Department of Motor Vehicles, I have determined that KESHAVJEE purchased the Stamp.

11. Based on analysis by the City of New York Department of Health and Mental Hygiene Public Health Laboratory, I know, among other things, that the Envelope, the Note, and the White Powder tested negative for anthrax.

WHEREFORE, your affiant respectfully requests that a warrant be issued for the arrest of AMEEN KESHAVJEE, the defendant, and that he be imprisoned or bailed, as the case may be.



KIMBERLY DALLAS  
Postal Inspector  
United States Postal Inspection Service

Sworn to before me this  
2nd day of January 2020



HONORABLE STEWART D. AARON  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK