



embezzled, stolen, purloined and converted, in violation of Title 18, United States Code, Section 641.

OVERT ACTS

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about December 3, 2019, JAHNICO HARVEY, the defendant, personally cashed at a post office in Manhattan a legitimately-issued postal money order ("Legitimate Postal Money Order-1"), which had been obtained through the exchange of a postal money order stolen from a post office in Brooklyn, New York ("Stolen Postal Money Order-1"), for cash and Legitimate Money Order-1.

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

COUNT TWO

(Conspiracy to Commit Bank Fraud)

4. From at least in or around January 2018, up to and including the present, in the Southern District of New York and elsewhere, JAHNICO HARVEY, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

5. It was a part and object of the conspiracy that JAHNICO HARVEY, the defendant, and others known and unknown, willfully and knowingly, would and did execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT THREE

(Aggravated Identity Theft)

6. From at least in or around January 2018, up to and including the present, in the Southern District of New York and elsewhere, JAHNICO HARVEY, the defendant, knowingly did transfer,

possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, HARVEY used the banking information of third parties to withdraw funds from accounts in which fraudulent, forged and/or altered checks had been deposited, in relation to the conspiracy to commit bank fraud charged in Count Two of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1),  
1028A(b), and 2.)

7. I am a Detective with the NYPD. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, my conversations with other law enforcement officials, 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 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.

### **Overview**

8. Based on my involvement in this investigation, I have learned that JAHNICO HARVEY, the defendant, and others known and unknown, engaged in at least in two schemes: (i) a scheme involving postal money orders stolen from the United States Postal Service ("USPS") (the "Money Order Scheme"), from at least in or about January 2019 up to and including the present, and (ii) a scheme involving fraudulent, forged, and/or altered checks (the "Check Fraud Scheme"), from at least in or about January 2018 up to and including the present.

### **The Money Order Scheme**

#### **Background on Postal Money Orders**

9. Based on my involvement in this investigation and my conversations with other law enforcement officers, I have learned the following, in substance and in part:

a. USPS money orders can be purchased at any United States Post Office in any amount up to \$1,000 U.S. dollars. Postal money orders contain a unique serial number that is pre-printed on each postal money order.

b. Prior to circulation, postal money orders are packaged in shrink-wrapped blocks containing 100 postal money orders in each wrapped package. These shrink-wrapped blocks of postal money orders are stored inside of a vault in each post office.

c. Postal money orders contain blank lines for the name and address of the sender, as well as the payee, of the postal money order. When a customer purchases a postal money order at a post office, the USPS clerk prints the date of purchase, post office code, a number identifying the clerk, and amount of the purchase on the postal money order. The customer fills in the name and address information for the sender and payee.

#### Overview of the Money Order Scheme

10. Based on my involvement in this investigation, my conversations with other law enforcement officers, and my review of documents and records, I have learned the following, in substance and in part:

a. From at least in or about January 2019 up to and including the present, in the Southern District of New York and elsewhere, JAHNICO HARVEY, the defendant, and others known and unknown, conspired to defraud the United States by cashing postal money orders that had been stolen from post offices in Manhattan, the Bronx, Brooklyn, Queens, Long Island, New Jersey, and Arkansas.

b. In furtherance of the money order scheme, members of the conspiracy obtained blank stolen postal money orders, occasionally still in the shrink-wrapped blocks containing 100 postal money orders. These stolen postal money orders lacked the date, post office code, clerk code, and amount printed by the USPS clerk at the time of a legitimate purchase.

c. To cash the blank stolen postal money orders, members of the conspiracy used computer software to mimic the legitimate USPS printing of date, post office code, clerk code, and amount on the stolen blank postal money orders.

d. Members of the conspiracy then cashed the altered stolen money orders at banks and post offices, using their own names and identification, the names of third parties, or fake names. When members of the conspiracy used the names of third parties or fake names, the members of the conspiracy typically presented fraudulent identification bearing their own photograph

but the personal information of a third party or fake personal identifying information.

e. The postal money orders cashed by members of the conspiracy originated from 18 post offices. In total, more than 15,000 postal money orders have been stolen from those 18 post offices. At a face value of up to \$1,000 per postal money order, the theft of postal money orders results in a potential loss to USPS of up to \$15 million.

#### HARVEY's Participation in the Money Order Scheme

"Keith Green"

11. Based on my involvement in this investigation, my conversations with other law enforcement officers, and my review of documents and records, including from USPS, NYPD, utilities companies, a social media platform, and information recovered from the phone of a co-conspirator ("CC-1") which was seized incident to the arrest of CC-1 and was searched pursuant to a judicially authorized search warrant issued on or about October 28, 2019, I have learned the following, in substance and in part:

a. Approximately 1,700 postal money orders have been stolen from a post office located in Brooklyn, New York (the "Rugby Post Office").

b. Approximately 100 postal money orders have been stolen from a different post office located in Brooklyn, New York (the "Brownsville Post Office").

c. On or about November 5, 2019, a postal money order that had been stolen from the Brownsville Post Office ("Stolen Postal Money Order-2") was cashed at a post office in Massachusetts. The date, post office code, clerk code, and amount, for \$1,000, which were printed on Stolen Postal Money Order-2, mimicked legitimate USPS printing but were false. The individual who cashed Stolen Postal Money Order-2 filled in the payee as "Keith Green" at an address in Newton, Massachusetts (the "Newton Address"), and the sender as "Gregory Watts" at an address in Chestnut Hills, <sup>OTW</sup> Massachusetts (the "Chestnut Hill Address"). The individual who cashed Stolen Postal Money Order-2 showed the USPS clerk a driver license with a license number ending in "6326" (the "6326 License Number"), which the USPS clerk recorded on Stolen Postal Money Order-2. As set forth below, *infra* ¶ 12, the individual who cashed Stolen Postal Money Order-2 was JAHNICO HARVEY, the defendant.

d. On or about November 5, 2019, a postal money order that had been stolen from the Rugby Post Office ("Stolen Postal Money Order-3") was exchanged, at a post office in Massachusetts, for approximately three legitimate postal money orders, in the amounts of, respectively, \$500 ("Legitimate Postal Money Order-2"), \$290 ("Legitimate Postal Money Order-3"), and \$200 ("Legitimate Postal Money Order-4"). The date, post office code, clerk code, and amount, for \$990, which were printed on Stolen Postal Money Order-3, mimicked legitimate USPS printing but were false. The individual who exchanged Stolen Postal Money Order-3 filled in the payee as "Keith Green" at the Newton Address, and the sender as "Gregory Watts" at the Chestnut Hill Address. The individual who exchanged Stolen Postal Money Order-3 showed the USPS clerk the 6326 License Number, which the USPS clerk recorded on Stolen Postal Money Order-3. As set forth below, *infra* ¶ 12, the individual who exchanged Stolen Postal Money Order-3 was HARVEY.

e. The payee listed on Legitimate Postal Money Order-3 and Legitimate Postal Money Order-4 was CC-1. The sender listed on Legitimate Postal Money Order-2 was a second individual ("CC-2"). The payee listed on Legitimate Postal Money Order-2 was an associate of CC-2 ("Associate-1"), based on a review of bank and utilities records showing that Associate-1 and CC-2 reside at the same address, as well as social media posts indicating that they are associated.

f. On or about November 6, 2019, a postal money order that had been stolen from the Brownsville Post Office ("Stolen Postal Money Order-4") was cashed at a post office in Massachusetts. The date, post office code, clerk code, and amount, for \$1000, which were printed on Stolen Postal Money Order-4, mimicked legitimate USPS printing but were false. The individual who cashed Stolen Postal Money Order-4 filled in the payee as "Keith Green" at an address in Bethlehem, Pennsylvania (the "Bethlehem Address"), and the sender as "Gregory Watts" at the Chestnut Hill Address. The individual who cashed Stolen Postal Money Order-4 showed the USPS clerk the 6326 License Number, which the USPS clerk recorded on Stolen Postal Money Order-4. As set forth below, *infra* ¶ 12, the individual who cashed Stolen Postal Money Order-4 was HARVEY.

g. On or about November 6, 2019, Stolen Postal Money Order-1, which had been stolen from the Rugby Post Office, was exchanged, at a post office in Massachusetts, for approximately \$489 in cash and Legitimate Money Order-1 for \$500. The date, post office code, clerk code, and amount, for \$990, which were printed on Stolen Postal Money Order-1, mimicked legitimate USPS printing

but were false. The customer filled in the payee as "Keith Green" at the Bethlehem Address, and the sender as "Gregory Watts" at the Chestnut Hill Address. The individual who exchanged Stolen Postal Money Order-1 showed the USPS clerk the 6326 License Number, which the USPS clerk recorded on Stolen Postal Money Order-1. As set forth below, *infra* ¶ 12, the individual who exchanged Stolen Postal Money Order-1 was HARVEY.

h. The payee listed on Legitimate Money Order-1 was "Jahnico Harvey," at an address associated with HARVEY, based on a review of bank and NYPD records.

i. On or about December 3, 2019, HARVEY cashed, at a post office in Manhattan, Legitimate Money Order-1. HARVEY presented to the USPS clerk HARVEY's legitimate New York driver license, which the USPS recorded.

12. Based on my involvement in this investigation, my conversations with other law enforcement officers, including officers with the New York State Police (the "NYSP"), and my review of documents and records, including those provided by the NYSP and those in law enforcement databases, I have learned the following, in substance and in part:

a. On or about February 24, 2020, JAHNICO HARVEY, the defendant, and another individual were arrested in New Windsor, New York, by NYSP officers, in connection with allegedly stolen merchandise.

b. When NYSP Officers searched HARVEY incident to HARVEY's arrest, NYSP Officers identified a fraudulent Pennsylvania driver's license, which bears HARVEY's photograph but the name "Keith Green," and contains the Bethlehem Address and 6326 License Number.

c. NYPD databases show no record of "Keith Green," who is located at the Bethlehem Address and is associated with the 6326 License Number.

#### *Mobile Payment App Transfers*

13. Based on my involvement in this investigation, my conversations with other law enforcement officers and representatives of a bank ("Bank-1"), and my review of documents and records, including from USPS and Bank-1, I have learned the following, in substance and in part:

a. Approximately 300 postal money orders have been stolen from a post office located in Manhattan (the "Greeley Post Office").

b. On or about August 7, 2019, approximately four postal money orders that had been stolen from the Greeley Post Office (the "Greeley Stolen Postal Money Orders"), were deposited at a branch of Bank-1 in the Bronx, New York, in the account of a third party ("Account-1"). The date, post office code, clerk code, and amount, for \$1,000 each, which were printed on Stolen Postal Money Order-1, mimicked legitimate USPS printing but were false.

c. On or about August 8, 2019, approximately two transfers of \$1,000 each were sent through a mobile payment application permitting peer-to-peer money transfers (the "Mobile Payment App"), from Account-1: (i) one transfer to an individual listed in Bank-1 records as "Jahnico Harvey," and (ii) one transfer to an associate of CC-1 ("Associate-2"). Based on a review of social media posts and information recovered from the phone of CC-1, CC-1 and Associate-2 are associated.

### **The Check Fraud Scheme**

#### Overview of the Check Fraud Scheme

14. Based on my involvement in this investigation, my conversations with other law enforcement officers, and my review of documents and records, I have learned the following, in substance and in part:

a. From at least in or around January 2018, up to and including the present, in the Southern District of New York and elsewhere, JAHNICO HARVEY, the defendant, and others known and unknown, defrauded multiple national banks.

b. Members of the conspiracy recruited collusive accountholders who allowed members of the conspiracy to deposit fraudulent checks into their bank accounts.

c. Members of the conspiracy then withdrew money from the collusive bank accounts after banks made available funds associated with the fraudulent check deposits to the account, but before the banks discovered that the checks were fraudulent and would not clear.

HARVEY's Participation in the Check Fraud Scheme

15. Based on my involvement in this investigation, my conversations with other law enforcement officers, and my review of records from several banks (together, the "Banks"), including a particular bank ("Bank-2"), and my conversations with employees of the Banks, including an employee of Bank-2, I have learned that from in or about July 2018 up to and including the present, JAHNICO HARVEY, the defendant, and others known and unknown, individually, and with each other and/or others, did deposit or attempt to deposit fraudulent checks into bank accounts not belonging to them. Specifically, I have learned in substance and in part:

a. The deposits of the Banks, including Bank-2, are insured by the Federal Deposit Insurance Corporation.

*Account-2*

b. On or about July 10, 2018, a check ("Check-1") in the amount of approximately \$10,000 was deposited at a Bank-2 Automated Teller Machine ("ATM") in Manhattan, into a bank account of a third party ("Account-2"). Check-1 was later identified by Bank-2 as fraudulent.

c. On or about July 17, 2018, approximately \$2,500 was transferred through the Mobile Payment App, from Account-2 to an individual listed in Bank-2 records as "Jahnico I" with a phone number ending in -7068 (the "7068 Number").

d. A representative of a different bank ("Bank-3") confirmed that (i) the 7068 Number was associated with an account belonging to HARVEY at Bank-3 (the "HARVEY Bank-3 Account"), and (ii) in approximately August 2020, the phone number associated with the HARVEY Bank-3 Account was changed to a phone number ending in -0265 (the "0265 Number"). In or about April 2019, HARVEY supplied the 0265 Number to the NYPD in connection with reporting a crime.

*Account-3*

e. On or about July 16, 2018, a check ("Check-2") in the amount of approximately \$5,000 was deposited at a Bank-2 ATM in Yonkers, New York, into a bank account of a third party ("Account-3"). Check-2 was later identified by Bank-2 as fraudulent.

f. On or about July 17, 2018, approximately \$2,500 was transferred through the Mobile Payment App, from

Account-3 to an individual listed in Bank-2 records as "Jahnico I Harvey" with the 7068 Number.

*Account-4*

g. On or about July 19, 2018, a check ("Check-3") in the amount of approximately \$7,500 was deposited at a Bank-2 ATM in Yonkers, New York, into a bank account of a third party ("Account-4"). Check-3 was later identified by Bank-2 as fraudulent.

h. On or about July 20, 2018, approximately \$2,500 was transferred through the Mobile Payment App, from Account-3 to an individual listed in Bank-2 records as "Jahnico I Harvey" with the 7068 Number.

*Account-5*

i. On or about July 23, 2018, a check ("Check-4") in the amount of approximately \$7,500 was deposited at a Bank-2 ATM in Yonkers, New York, into a bank account of a third party ("Account-5"), by a person later identified as CC-1. Check-4 was later identified by Bank-2 as fraudulent.

j. On or about July 23, 2018, a person later identified as CC-1 attempted to withdraw approximately \$200 in cash from Account-5 at an ATM in Yonkers, New York.

k. On or about July 24, 2018, approximately \$2,500 was transferred through the Mobile Payment App, from Account-5 to an individual listed in Bank-2 records as "Nico" with the 7068 Number.

l. On or about July 24, 2018, a person later identified as HARVEY attempted to withdraw approximately \$1,000 in cash from Account-5 at an ATM in Manhattan. I have compared surveillance footage of the person withdrawing funds from Account-5, with photographic records maintained by the NYPD for HARVEY. Based on my comparison of the likeness of the individual making the withdrawal described above and the known photographs of HARVEY, I believe that the person making the withdrawal described above is HARVEY.

m. On or about July 24, 2018, a debit card linked to Account-5 was used to purchase two legitimate postal money orders for approximately \$980 each from a post office in the Bronx, New York, one of which listed HARVEY as the payee.

*Account-6*

n. On or about July 24, 2018, a check ("Check-5") in the amount of approximately \$9,000 was deposited at a Bank-2 ATM in Stamford, Connecticut, into a bank account of a third party ("Account-6"). Check-5 was later identified by Bank-2 as fraudulent.

o. On or about July 25, 2018, approximately \$2,500 was transferred through the Mobile Payment App, from Account-6 to an individual listed in Bank-2 records as "Jahnico I Harvey" with the 7068 Number.

*Account-7*

p. On or about July 24, 2018, a check ("Check-6") in the amount of approximately \$9,000 was deposited at a Bank-2 ATM in Old Greenwich, Connecticut, into a bank account of a third party ("Account-7"). Check-6 was later identified by Bank-2 as fraudulent.

q. On or about July 25, 2018, approximately \$2,500 was transferred through the Mobile Payment App, from Account-7 to an individual listed in Bank-2 records as "Jahnico I Harvey" with the 7068 Number.

*Account-8*

r. On or about July 27, 2018, a check ("Check-7") in the amount of approximately \$7,500 was deposited at a Bank-2 ATM in Yonkers, New York, into a bank account of a third party ("Account-8"), by persons later identified as CC-1 and an unknown co-conspirator ("CC-3"). Check-7 was later identified by Bank-2 as fraudulent.

s. On or about July 28, 2018, a person later identified as HARVEY attempted to withdraw approximately \$900 in cash from Account-8 at an ATM in Manhattan. I have compared surveillance footage of the person withdrawing funds from Account-8, with photographic records maintained by the NYPD for HARVEY. Based on my comparison of the likeness of the individual making the withdrawal described above and the known photographs of HARVEY, I believe that the person making the withdrawal described above is HARVEY.

t. On or about July 28, 2018, a debit card linked to Account-8 was used to purchase a legitimate postal money order, which listed HARVEY as the payee, from a post office in the Bronx, New York.

*Account-9*

u. On or about July 27, 2018, a check ("Check-8") in the amount of approximately \$7,500 was deposited at a Bank-2 ATM in Yonkers, New York, into a bank account of a third party ("Account-9"), by persons later identified as CC-1 and CC-3. Check-8 was later identified by Bank-2 as fraudulent.

v. On or about July 30, 2018, approximately \$2,490 was transferred through the Mobile Payment App, from Account-9 to an individual listed in Bank-2 records as "Jahnico I Harvey" with the 7068 Number.

*Account-10*

w. On or about May 6, 2019, a check ("Check-9") in the amount of approximately \$2,500 was deposited through a mobile deposit, into a bank account of a third party ("Account-10"). Check-9 was later identified by Bank-2 as fraudulent.

x. On or about May 7, 2019, approximately \$2,500 was transferred from Account-10 to the account of an individual listed in Bank-2 records as "Jahnico" with the 7068 Number.

y. On or about May 18, 2019, a check ("Check-10") in the amount of approximately \$8,000 was deposited at a Bank-2 ATM in White Plains, New York, into Account-10. Check-10 was later identified by Bank-2 as fraudulent.

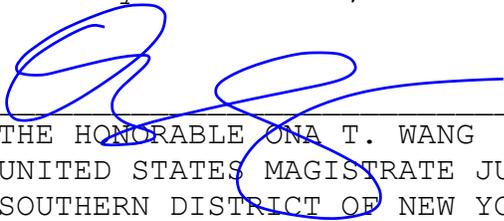
WHEREFORE, the deponent respectfully requests that a warrant issue for the arrest of JAHNICO HARVEY, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.

S/ Daniel Alessandrino /OTW  
(Badge No. 894)

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Detective Daniel Alessandrino  
New York City Police Department

Sworn to me through reliable  
electronic means this  
26<sup>th</sup> day of October, 2020



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THE HONORABLE ONA T. WANG  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK