

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Delaware

REDACTED

United States of America

v.

Jasmine Holloway

Case No.

22-200M

Defendant(s)

SEALED

UNSEALED
6/10/22
RTK

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/27/22, 5/22/22, 5/29/22, & 6/5/22 in the county of New Castle in the District of Delaware, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. Section 1709	Theft of Mail Matter by Postal Employee

FILED

JUN 8 2022

U.S. DISTRICT COURT DISTRICT OF DELAWARE

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Complainant's signature

SA Justin Lynch, USPS-OIG

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed R. Crim. P.4.1 and 4(d)

Date: June 8, 2022

Judge's signature

City and state: Wilmington, Delaware

Hon. Sherry R. Fallon, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA

v.

JASMINE HOLLOWAY,

Defendant

Criminal Action No. 22- *200M*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I am a Special Agent with the U.S. Postal Service – Office of Inspector General (“USPS-OIG”). I have been a Special Agent of the USPS-OIG since September 2019. Prior to serving as a Special Agent with USPS-OIG, I was employed as Special Agent with the U.S. Treasury Inspector General for Tax Administration (“TIGTA”) for approximately five years. As a Special Agent with USPS-OIG and TIGTA, I have participated in numerous investigations involving allegations of mail theft and fraud, bank fraud, and identity theft. I have also participated in executing search warrants in investigations related to mail theft and fraud, bank fraud, and identity theft, and executed search warrants involving the search and seizure of financial documents and records and electronic media, including cellular telephones and laptop computers. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

2. This affidavit is submitted in support of a criminal complaint charging Jasmine Holloway, age 32, of Wilmington, Delaware, with violating Title 18, United States Code, Section 1709 (Theft of Mail Matter by Postal Employee).

3. For the reasons set forth below, I respectfully submit that this affidavit contains probable cause to believe that Jasmine Holloway, a postal employee, has committed theft of mail matter.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show only that there is sufficient probable cause to charge Holloway with violations of Title 18, United States Code, Section 1709 (Theft of Mail Matter by Postal Employee) on March 27, 2022; May 22, 2022; May 29, 2022; and June 5, 2022. This affidavit does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

5. Company 1 has filed a series of complaints with the United States Postal Inspection Service (USPIS) and United States Postal Service Office of Inspector General (USPS-OIG) stating it was the victim of ongoing theft.

6. On October 15, 2021, your affiant conducted a consensual interview with Company 1's operations manager ("Witness 1"), who explained Company 1 is a shipping logistics company. Customers purchase items, typically electronics like smartphones and laptops, to be shipped to former Soviet-bloc countries. Customers ship the items to Company 1's warehouse in either Port Reading, New Jersey or Wilmington, Delaware, and then Company 1 ships the items overseas.

Customers submit descriptions of items being shipped to Company 1 through Company 1's website.

7. Witness 1 explained that approximately two years ago Company 1 started receiving damaged, empty boxes. This began sporadically but ramped up in 2021. On August 9, 2021, Witness 1 began a spreadsheet logging every empty parcel received from that date going forward, including the parcel's tracking number, the date Company 1 received the empty parcel, and a link to an image of the empty packaging. All empty packages were delivered to Company 1's Wilmington, Delaware warehouse and came through the USPS Marshallton Branch ("Marshallton Post Office") located at 3434 Old Capitol Trail, Wilmington, Delaware 19808. Company 1 recorded over 150 empty parcels received from August 9, 2021-October 15, 2021, and Witness 1 confirmed they receive more empty packages every day.

8. Witness 1 later informed your affiant that in addition to the at least 150 empty parcels that had been delivered to date by USPS to Company 1's Wilmington, Delaware warehouse, Company 1 had a list of 45 additional parcels that were never received in their entirety, despite USPS tracking information indicating those parcels were delivered. Some of these parcels contained smartphones, one of which (a black iPhone 12) was subsequently identified by your affiant as being used in Philadelphia, Pennsylvania.

9. On October 22, 2021, your affiant conducted a consensual interview of the customer service manager of the Marshallton Post Office ("Witness 2"). Witness 2 confirmed that the Marshallton Post Office receives approximately 1,000 parcels a day addressed to Company 1. While those packages receive no special processing, they are stored in a separate area of the post office given their volume. Marshallton Post Office receives parcels for Company 1 seven days a

week; however, Company 1's Wilmington, DE warehouse is only open Monday through Friday. Thus, parcels received for Company 1 at Marshallton Post Office on the weekend sit onsite all weekend and are not delivered until the following Monday morning.

10. Your affiant knows from training and experience that when a package arrives at a post office, it is scanned as "arrival at unit." USPS takes and maintains photographs of parcels as they arrive at the post office. Your affiant reviewed images from the Marshallton Post Office and confirmed that a large percentage of the parcels which arrived at Company 1 damaged and empty had arrived at the Marshallton Post Office intact, meaning they were emptied and damaged sometime after their arrival at the Marshallton Post Office. Your affiant also reviewed a USPS database and determined that the majority of parcels which arrived at Company 1 damaged and empty had arrived at the Marshallton Post Office on a Sunday.

11. Your affiant worked with others at USPS-OIG to install covert surveillance cameras to capture the area where Company 1's packages are stored at the Marshallton Post Office. The surveillance cameras record seven days a week from approximately 2:45 am to 9:00 pm (Marshallton Post Office's operating hours are approximately 3:00 am to 8:00 pm). On January 7, 2022, your affiant reviewed footage from December 12, 2021 and discovered that parcels that were in view of the cameras at 9:00 pm had disappeared when the cameras restarted at 2:45 am the next morning. In addition, a light in the janitor's closet that was turned on on December 12, 2021 at 9:00 pm was off the next day at 2:45 am. Your affiant contacted USPIS' National Law Enforcement Communication Center (NLECC), which serves as a dispatch center for USPS' law enforcement agencies, to inquire about Marshallton Post Office's security alarm on the night of December 12, 2021. NLECC advised Marshallton Post Office's security system was disarmed

that night at 11:00 pm and reactivated 43 minutes later, confirming someone had entered the post office that night.

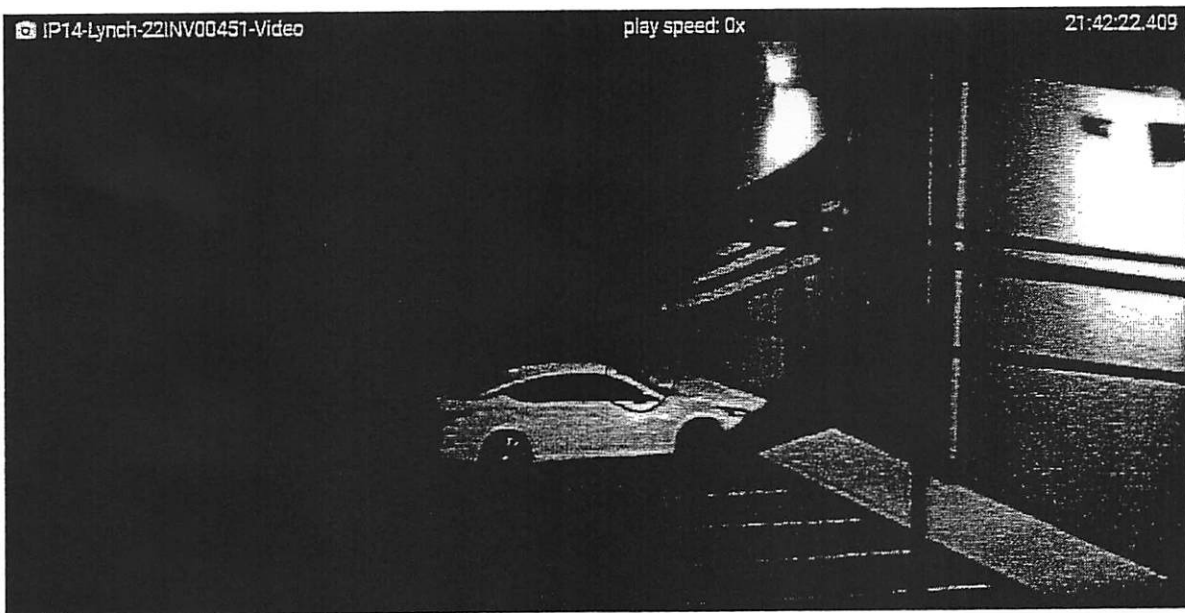
12. On January 8, 2022, your affiant obtained from NLECC and reviewed the Marshallton Post Office Alarm Panel Log dating back to August 1, 2021 (which covered the span of Company 1's empty parcel log). Your affiant discovered an unknown individual(s) had accessed Marshallton Post Office overnight at least 35 times from August 2021 to January 2022, usually on Sundays. An alarm code belonging to "User 3" was exclusively used to deactivate and reactivate the Marshallton Post Office alarm panel those nights. SA Lynch searched USPS' time and attendance system and did not identify any employees who were clocked in during the overnight intrusions.

13. On or around January 9, 2022, USPS-OIG altered the covert surveillance cameras in Marshallton Post Office to record all night on Sundays. Review of the footage from Sunday, January 9, 2022, revealed an unknown individual entered Marshallton Post Office at 11:26 pm, after disabling the alarm panel with the code for "User 3." The individual immediately went to the area where Company 1's parcels are stored in Marshallton Post Office and began cutting open parcels and removing their contents. The individual opened parcels to steal their contents for over 20 minutes and left at 11:50 pm. While the camera captured the individual's movements, it did not capture the individual in enough detail for identification.

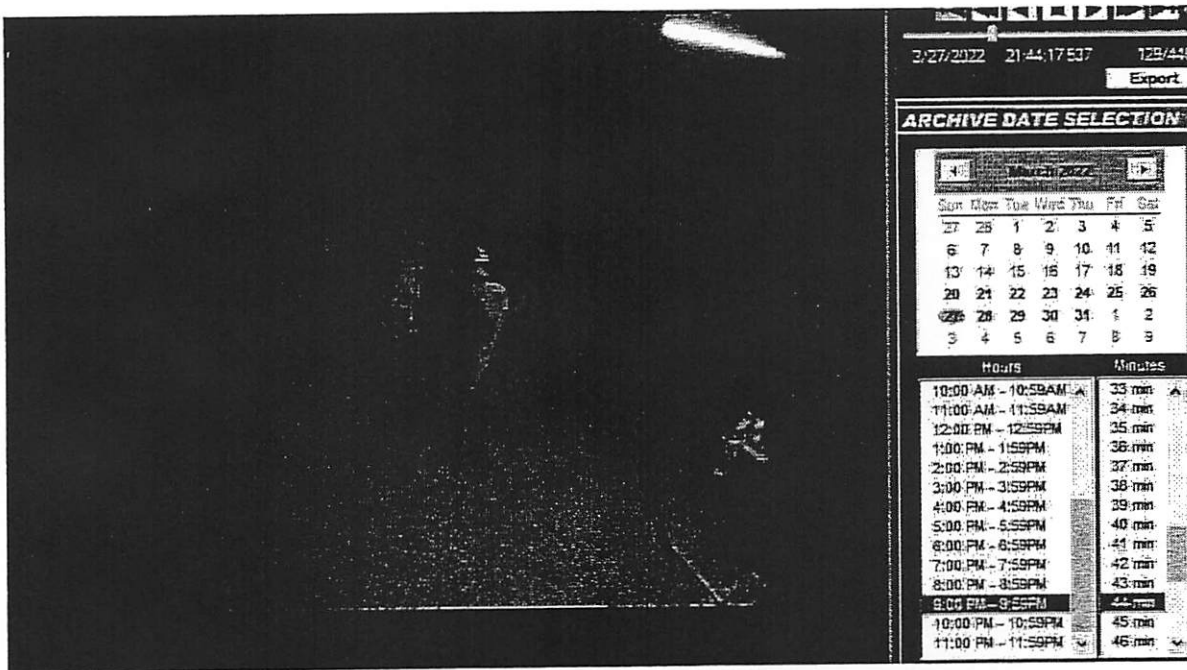
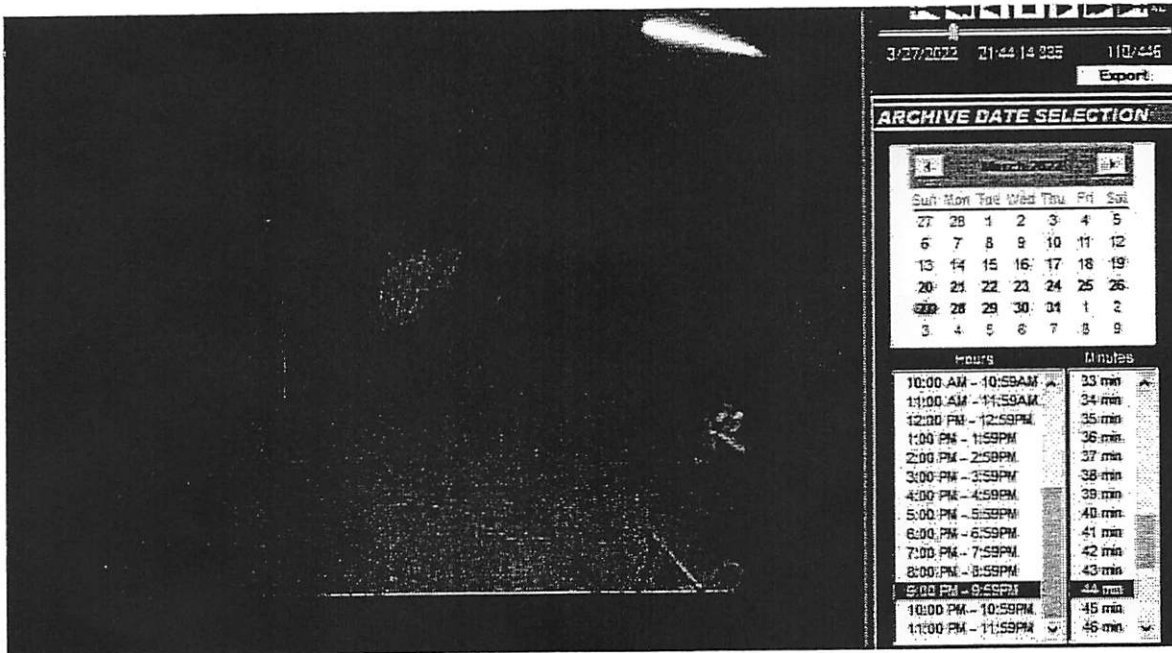
14. Your affiant learned from Witness 2 that the alarm code belonging to "User 3" for Marshallton Post Office is a shared access code used by multiple Marshallton Post Office staff members. Further, anyone who knows the "User 3" code can enter the Marshallton Post Office, even if they are not a current employee.

15. On or around January 27, 2022, a pole camera was installed outside Marshallton Post Office to enable exterior surveillance of the facility, in an attempt to identify who was entering the building on Sunday evenings.

16. On Sunday, March 27, 2022, the pole camera captured a vehicle that appeared to be a white sixth generation (2019 to present) Nissan Altima arriving at Marshallton Post Office at 9:42 pm:



The vehicle had front and rear license plates (ruling out a registration to Delaware or Pennsylvania), with the front plate appearing to have a white background. An individual who appeared to be a female, wearing pink sweatpants and a dark USPS hooded sweatshirt, exited the vehicle and entered Marshallton Post Office. Review of the covert surveillance cameras inside Marshallton Post Office revealed the unknown female walked towards the area where Company 1's parcels are stored and began opening parcels and taking their contents, see below:



The unknown female opened parcels and removed their contents for approximately 15 minutes, returned to the vehicle parked outside, and left Marshallton Post Office at 9:57 pm.

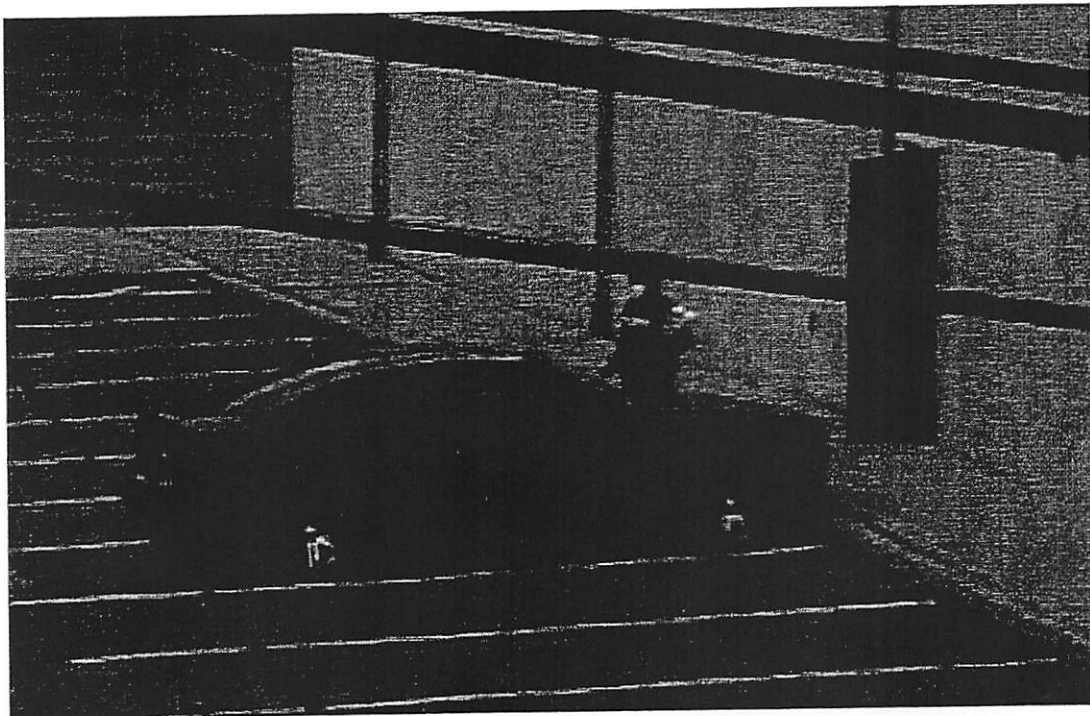
17. On April 12, 2022, your affiant reviewed the surveillance footage from March 27, 2022 with Witness 2. Witness 2 immediately said, "That looks like Jasmine." Witness 2 identified "Jasmine" as Jasmine Holloway (Holloway), a USPS clerk who worked at Marshallton Post Office from 2019 through March 2021. Witness 2 showed Holloway's Facebook profile to your affiant to point out the physical similarities between Holloway and the female captured on the surveillance footage. Witness 2 also stated he remembered Holloway wearing pink sweatpants to work and the same type of sandals as the female captured on the surveillance footage.

18. Witness 2 stated Holloway's duties as a clerk at Marshallton Post Office included working on Sundays to sort packages (when staffing would have been minimal), and Holloway would have had the alarm code belonging to "User 3" for Marshallton Post Office.

19. Your affiant reviewed Holloway's USPS employee profile and noted her address of record was Wilmington, Delaware 19805. On April 13, 2022, your affiant traveled to Holloway's residence and noticed a white sixth generation Nissan Altima bearing white Massachusetts license plates with number 1JJR73 parked in the immediate vicinity of Holloway's residence. Your affiant checked the registration for this vehicle which came back to a 2021 Nissan Altima owned by Avis Rental Car. Your affiant obtained the rental reservation agreement from Avis for the 2021 Nissan Altima, which revealed it was rented from March 20, 2022 to April 18, 2022, by Jeanea Brown (Brown) of Philadelphia, Pennsylvania. Your affiant has not yet ascertained the connection between Holloway and Brown.

20. On Sunday May 22, 2022, the pole camera captured a dark blue sixth generation Dodge Charger arrive at Marshallton Post Office at 6:00 pm. The vehicle had a Delaware license plate that was not legible in the footage. An individual consistent with the appearance of Holloway

exited the driver's side of the vehicle and entered Marshallton Post Office using the User 3 access code. Review of the covert surveillance cameras inside Marshallton Post Office revealed the individual consistent with Holloway walked towards the area where Company 1's parcels are stored and opened parcels to remove their contents. The female consistent with Holloway opened parcels and removed their contents for approximately 20 minutes, returned to the Dodge Charger carrying what appeared to be a full bag, and left Marshallton Post Office, see below:



21. The pole camera captured the same dark blue Dodge Charger return to Marshallton Post Office at 7:43 pm that night. An individual consistent with the appearance of Holloway exited the driver's side of the vehicle and re-entered Marshallton Post Office. Review of the covert surveillance cameras inside Marshallton Post Office revealed the individual consistent with Holloway walked towards the area where Company 1's parcels are stored again and opened parcels to remove their contents. The female consistent with Holloway opened parcels and removed their

contents for approximately 10 minutes, returned to the Dodge Charger, and left Marshallton Post Office

22. On Sunday May 29, 2022, the pole camera captured a vehicle that appears to be a dark gray, second generation (2011 to present) Chevrolet Spark arrive at Marshallton Post Office at 8:34 pm. The vehicle appears to have a Pennsylvania license plate that was not legible in the footage. An individual consistent with the appearance of Holloway exited the passenger's side of the vehicle and entered Marshallton Post Office using the User 3 access code. Review of the covert surveillance cameras inside Marshallton Post Office revealed the individual consistent with Holloway walked towards the area where Company 1's parcels are stored and opened parcels to remove their contents. The female consistent with Holloway opened parcels and removed their contents for approximately 20 minutes, returned to the Chevy Spark carrying a blue bag full of items stolen from the post office, and left Marshallton Post Office, see below, with a red circle around the blue bag added by your affiant:



23. On the evening of Sunday, June 5, 2022, USPS-OIG special agents conducted a surveillance operation to monitor the activities of USPS Clerk Jasmine Holloway at Holloway's residence (Wilmington, DE 19805, the Subject Premises) and the Marshallton Post Office. On this date at 8:11 pm, a USPS-OIG special agent witnessed an African American female consistent with Holloway's physical description exit Holloway's residence wearing a mask, dark USPS hooded sweatshirt, white shorts, and carrying a blue bag. The female consistent with Holloway entered a vehicle waiting outside of Holloway's residence and departed the area.

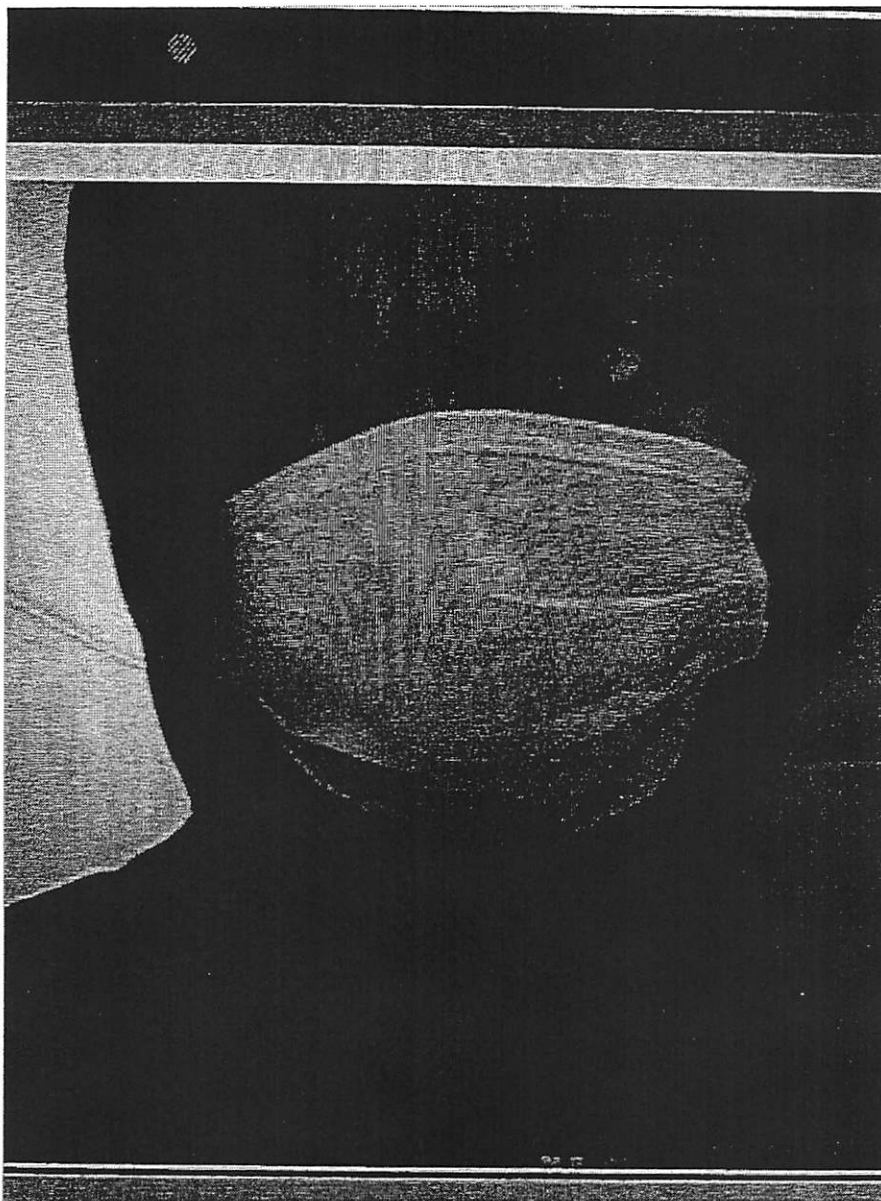
24. At 8:20 pm, a dark sedan arrived at the Marshallton Post Office. The female consistent with Holloway wearing a mask, dark USPS hooded sweatshirt, and tight white shorts

entered Marshallton Post Office and disabled the security alarm—which contained a covert surveillance camera installed by USPS-OIG—using the User 3 access code. The female consistent with Holloway proceeded to the area where Company 1’s parcels are stored and opened parcels to review and remove their contents for over 30 minutes. USPS-OIG special agents recorded the thefts on video from a covert surveillance location inside the post office. At 8:51 pm, the female consistent with Holloway placed a phone call from the USPS supervisor desk landline phone and the dark sedan returned to the Marshallton Post Office parking lot. The female consistent with Holloway placed all stolen products in the blue bag she brought from her residence, re-armed the post office’s security system, and departed Marshallton Post Office at 8:52 pm.

25. At 9:12 pm, a USPS-OIG special agent witnessed the dark sedan pull up in front of Holloway’s residence. The USPS-OIG special agent then witnessed the female consistent with Holloway exit the vehicle carrying the blue bag which appeared heavy and weighted with items. The female consistent with Holloway entered Holloway’s residence and the surveillance operation concluded.

26. After the conclusion of the surveillance operation, USPS-OIG agents checked the landline telephone Holloway used to place a call. Agents reviewed the call log and discovered Holloway had dialed 302-766-1507, which your affiant confirmed through a law enforcement database belongs to Travis Pollard. Pollard is not a USPS employee and your affiant has not yet ascertained the connection between Pollard and Holloway.

27. USPS-OIG special agents also removed the hard drive from the covert surveillance camera that was installed inside the Marshallton Post Office security alarm. Review of that footage provided the following image from the time of the thefts that evening:




28. On June 6, 2022, your affiant showed the photo above to Witness 2. Witness 2 immediately responded “That’s Jasmine, without a doubt.”

CONCLUSION

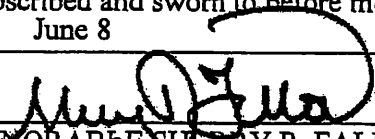
29. Based on the above information, there is probable cause to believe that on March 27, 2022; May 22, 2022; May 29, 2022; and June 5, 2022, Jasmine Holloway, a postal employee, committed the theft of mail matter, in violation of Title 18, United States Code, Section 1709.

Respectfully submitted,



Justin Lynch
Special Agent
U.S. Postal Service
Office of Inspector General

Subscribed and sworn to before me by telephone
on June 8, 2022



HONORABLE SHERRY R. FALLON
UNITED STATES MAGISTRATE JUDGE