

UNITED STATES DISTRICT COURT

for the

District of Rhode Island

United States of America)
v.)
THERESA MARIE DIJOSEPH)

Case No. 1:24-mj-00062 PAS

Defendant(s)

CRIMINAL COMPLAINT

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 December 2023, and May 2024 in the county of in the District of Rhode Island, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 21 U.S.C. § 841, 21 U.S.C. § 846, 18 U.S.C. § 1791, and 18 U.S.C. § 1001.

This criminal complaint is based on these facts:

See the attached Affidavit of Special Agent Pepper M. Daigler, Federal Bureau of Investigation ("FBI")

Continued on the attached sheet.

Handwritten signature of Special Agent Pepper M. Daigler

Complainant's signature

Special Agent Pepper M. Daigler, FBI

Printed name and title

Sworn telephonically and signed electronically

Sworn to before me and signed in my presence.

Date: July 23, 2024

City and state: Providence, Rhode Island

Handwritten signature of Patricia A. Sullivan

Judge's signature

Patricia A. Sullivan, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Pepper M. Daigler, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I am employed by the FBI since January 2016. I am currently assigned to the FBI Boston Division's Providence Resident Agency. I am responsible for investigating Public Corruption, Civil Rights Violations and White-Collar crimes in Rhode Island. Prior to my assignment in Rhode Island, I was assigned to the Boston Field Office's Healthcare Fraud Squad. I have experience investigating narcotics, money laundering, wire fraud, mail fraud and other crimes. My investigations have involved the use of surveillance techniques, and the execution of search, seizure and arrest warrants.

2. The facts in this affidavit come from my involvement in a collaborative investigation being handled primarily by the FBI, and members of the Professional Standards Unit at the Donald W. Wyatt Detention Facility (Wyatt). This affidavit is intended to show there is probable cause for the requested arrest warrants and does not set forth all of my knowledge about this matter.

3. I submit this affidavit in support of a criminal complaint charging THERESA MARIE DIJOSEPH, YOB: 1973, of Woburn, MA; with violations of Title 21, U.S.C. § 841 (Possession with Intent to Distribute a Controlled Substance), Title 18, U.S.C. § 1791, (Providing a Prohibited Object to an Inmate) and Title 18, U.S.C. § 1001 (Making a Materially False, Fictitious, or Fraudulent Statement), and HANASA STEDFORD, YOB: 2002 of New Haven, CT, SHAWN DAVID HART, YOB: 1978, and SAMUEL DOUGLAS, YOB: 1998 with

violations of 21 U.S.C. § 846 (Conspiracy to Possess with Intent to Distribute a Controlled Substance) and Title 18, U.S.C. § 1791, (Providing a Prohibited Object to an Inmate).

4. Based on the information set forth below, I believe that there is probable cause to believe that DIJOSEPH, HART, STEDFORD, and DOUGLAS conspired to obtain and did obtain contraband and provided the contraband to an inmate at Wyatt.

PROBABLE CAUSE

Background to the Investigation: Wyatt Incident Reports Regarding DiJoseph's Conduct

5. Theresa Marie DIJOSEPH (DIJOSEPH), telephone number [REDACTED], of Woburn, Massachusetts is a licensed attorney in the Commonwealth of Massachusetts according to the Massachusetts Board of Bar Overseers website.¹ DIJOSEPH's LinkedIn biography lists her as a sole proprietor for the Law Offices of Theresa DiJoseph, whose practice concentration is civil litigation, including personal injury involving automobile accidents and slip-and-falls, and a child welfare caseload representing clients before the Department of Children and Families.

6. Detainee Shawn David HART (HART) has been a detainee at the Donald W. Wyatt Detention Center since June 2023 when he was charged in the District of Massachusetts with distribution of more than 40 grams of fentanyl, possession with intent to distribute more than 50 grams of methamphetamine, possession of a firearm in furtherance of a drug trafficking crime, and felon in possession of firearms and ammunition.

7. On July 9, 2023, at approximately 5:25am, DIJOSEPH arrived at the Donald W. Wyatt Detention Facility (Wyatt) for a contact visit with HART. So-called contact visits are visits with an inmate that do not include a plexiglass screen between the visitor and the inmate.

¹ A search of the New Hampshire Bar Association and Maine State Bar Association website did not list DIJOSEPH as a licensed attorney in either state.

They are sometimes used for attorney visits to conduct legal work and must be approved by the detention center. At the time of her visit, DIJOSEPH filled out a form indicating that she was HART's attorney.² DIJOSEPH also asked to be placed in Contact Visit Room 4, stating she would feel more comfortable in that room. DIJOSEPH was asked to explain her reasoning and told the correctional officer that Room 1 was too open and other attorneys could see her, Room 2 was too loud, and in Room 3, the correctional officer nearby would stare at her too much. DIJOSEPH and HART were allowed to have the contact visit in Room 4, after the correctional officer advised DIJOSEPH that the visiting rooms were not for her leisure but for her safety.

8. During the contact visit, a correctional officer observed that DIJOSEPH was "slouching and acting very suspicious" and watching the correctional officer's movements.

9. After DIJOSEPH's contact visit, Wyatt correctional officers wrote two Incident Reports describing DIJOSEPH's request to be placed in contact visit Room 4, as well as the correctional officer's observations during the visit. The Incident Reports were forward to Wyatt's Professional Standards Unit.

10. The Incident Reports were reviewed by David Tomasso, Director of Wyatt's Professional Standards Unit. Director Tomasso also reviewed messages sent via tablet between HART and DIJOSEPH³ that revealed that DIJOSEPH would send personal photos of herself, and

² DIJOSPEH does not represent HART in his criminal matter for which he is awaiting trial at Wyatt. During various communications with Wyatt, referenced in this affidavit, DIJOSEPH stated she was doing probate work and had an immediate need to see HART and have contact visits to work on these matters. Agents obtained the docket for HART's family court proceeding in New Hampshire and observed that DIJOSEPH was not listed on the docket as counsel. Agents also spoke to the attorney representing HART's ex-wife in Maine. That attorney confirmed that the petitioning party is pro se, the attorney was not familiar with the name DIJOSEPH, nor is there a DIJOSEPH affiliated with the matter.

³ Inmates at Wyatt are given access to a messaging platform called ViaPath that is accessible through tablets in the prison. The platform is for detainees to communicate with family and friends outside the facility. In order for a detainee to use a tablet, he must sign an acknowledgement form that states that all use of the tablet messaging services is subject to monitoring, recording, and retention. It is not to be used for confidential attorney-client communications. In addition, in order for external users to communicate

screenshots showing Cash App or sports betting transactions that she appeared to have engaged in on HART's behalf.⁴ Director Tomasso also spoke with DIJOSEPH by phone, who said she was doing probate work for HART and that she had visited him four times within a two-week period because she felt bad for him.⁵ (Agents later checked the dockets for two family court proceedings involving HART's children in New Hampshire and Maine, spoke with counsel of record in those matters, and checked were unable to find any evidence of DIJOSEPH representing any party in those proceedings.) During that conversation, DIJOSEPH was advised by Director Tomasso that she would be limited to non-contact visitation with HART for safety and security reasons.

11. Director Tomasso also wrote an email to the Warden on July 13, 2023, requesting a memo from the Warden's office that could be posted in the lobby so DIJOSEPH would not be placed in a contact visitation room with HART.

with a Wyatt inmate, the external user must agree to ViaPath's terms of use that also states that the facility and law enforcement agencies monitor, record, and store the messages and content sent between the user and the inmate.

⁴ For example, some of the messages sent from DIJOSEPH to HART read as follows: "Morning, mushball. I don't you as ny waw up call. Slept in until 10am<OMG I have court at 10:45 am" (July 31, 2023 at 10:10 am); "Thanks for saying sorry. Just saw that! I'm just stressed!! Also I did send pics. You didn't get them!?? Also, do you know yet what's going on this weekend?" (August 1, 2023 at 5:52 am); "Whoever this is for \$100. I have it as paid, but whatever. I just wish you got \$200 worth of whatever bc that's what I paid! See pics! The first one says 'You already paid this person \$100, do you want to pay again?' SOOOOO" (August 1, 2023 at 1:19 pm).

Some of the messages from HART to DIJOSEPH read as follows: "Send a \$100 please." (July 31, 2023 at 2:15 pm); "How's your day honey?" (July 31, 2023 at 3:46 pm); "No I was telling you on my kids the network was fucked up all day lol I have to request the visit to u for video we can do one tomorrow can't do them while im in my cell hun thank you for the money if you can put something on my commissary that would b nice,what time you want me to video you tomorrow I'll tell you if I can? I bet u looked good today" (August 3, 2023 at 9:44 pm).

⁵ Prior to Director Tomasso's email to the Warden DIJOSEPH had visited HART on June 29, July 2, July 4, July 9 and July 14, 2023.

12. On August 26, 2023, DIJOSEPH emailed the Warden about the termination of contact visits with HART. DIJOSEPH noted that she was repulsed by Tomasso's allegations of potential misconduct, that she had never been alleged to have violated attorney ethics rules, and that no one had ever filed a complaint against her with the Board of Bar Overseers. She explained her relationship with HART by saying she had been long time friends with his family, and that she needed to visit him urgently at Wyatt because an unidentified "opposing party" had served HART with "many documents." She further stated that there were "very complicated applicable rules and procedures and caselaw that must be explained to him in person for his very complicated situation." DIJOSEPH also wrote that her cases with HART have now been "pushed back," and she is unable to accomplish what she needed to explain to HART through the plexiglass in a non-contact visit.

13. On September 20, 2023, DIJOSEPH again emailed Wyatt's Warden with a complaint about a visit she had with HART on October 16, 2023⁶. In the email, DIJOSEPH stated, "You set forth stipulation for our visits, which were in line with other attorneys and clients, However, the way my enter [*sic*] file was 'viewed' was illegal." DIJOSEPH acknowledged that she signed a form agreeing that, "Any paperwork being shown to or left for the detainee must be checked and identified by you with the lobby officer upon check-in before your visit," but asserted that the policy was "illegal" because a correctional officer had reviewed "each piece of paper methodically and slowly contained in [her] file, including very sensitive material and attorney work product."

⁶ The date of the email is September 20, 2023, which predates the date DIJOSEPH listed within the email, October 16, 2023. Your affiant believes this may be a typo and refers to a visit on September 16, 2023, which is documented by DIJOSEPH's signature in the visitor's logbook for September 16, 2023.

14. DIJOSEPH also complained that after her visit HART was strip-searched and questioned. DIJOSEPH requested that the Warden reinstate contact visits with HART and notify the correctional officers with a memo.

15. On or about November 2023, DIJOSEPH was allowed to resume contact visits with HART.

Summary of DIJOSEPH's December 1, 2023, Contact Visit with HART

16. On December 1, 2023, at approximately 4:20 pm, DIJOSEPH entered Wyatt to have a contact visit with HART. After DIJOSEPH completed Wyatt's "Notification to Visitors and Request to See Detainee" form, which again included an agreement to the stipulation that paperwork being shown to or left for the detainee must be checked and identified by the visitor with the lobby officer upon check-in. The correctional officer on duty reviewed the materials DIJOSEPH indicated she wanted to bring into the contact visit with HART.⁷ In doing so, the officer observed multiple pieces of paper that appeared as though they had been wet and then dried, were thicker than normal paper, and appeared discolored. Based on the correctional officer's experience identifying drugs in a correctional setting, he confiscated the papers—10 pieces total—from DIJOSEPH as potential synthetic marijuana (also known as K2⁸) and she was

⁷ Per the Wyatt Detention website, attorneys having a client visit may bring the following into the visit: briefcase, case files, memo pads, writing utensils and information related to the detainee's case. Further, if an attorney needs to provide their client with legal material, the attorney should notify the officer who will assist the attorney with the process to provide materials.

⁸ Synthetic marijuana are synthetically designed drugs that intended to mimic THC, the main psychoactive ingredient of marijuana (DEA.gov). Based on my experience working contraband matters at the Wyatt Detention Center and other Federal Correctional Facilities, I am aware that synthetic marijuana is often smuggled into facilities through pieces of paper that have been sprayed or dipped in the synthetic marijuana. The paper is then torn into smaller pieces and distributed throughout the facility for payment. Based on the writer's training and experience working these matters, and interviews with Wyatt's Professional Standards Unit and Detainees at the Wyatt Detention Center, I am aware that a single sheet of K2 paper can be sold at Wyatt for between \$1,000 and \$4,000 based on the availability of the contraband at the facility at the time. A single sheet of K2 paper will often be cut and sold in smaller pieces.

denied entry for the visit. The 10 pieces of paper were seized by Wyatt’s Professional Standards Unit and placed in secure storage until they were collected by the FBI on December 4, 2023.

17. The 10 pages seized from DIJOSEPH were sent to the FBI Laboratory in Quantico, Virginia and on February 2, 2024, the lab returned results that the 10 pages of paper had readily visible staining observed on each page that a collective sampling of the pages contained residue of MDMA-4en-PINACA and ADB-4en-PINACA, both Schedule 1 controlled substances.

DIJOSEPH’s and HART’s Communications About the Visit

18. After the seizure of the 10 pages of paper, Wyatt personnel reviewed electronic communications between DIJOSEPH and HART regarding the visit.

19. On December 1, 2023, beginning at approximately 3:00 pm (before DIJOSEPH’s visit), DIJOSEPH and HART discuss when she can visit him and that she will be meeting another female. DIJOSEPH and HART had the following text message exchange:

<i>Date</i>	<i>Time</i>	<i>From</i>	<i>To</i>	<i>Message</i>
12/1/2023	3:00pm	HART	DIJOSEPH	Im just telling u what I'm told you have the right number
12/1/2023	3:01pm	HART	DIJOSEPH	I'm pretty sure she was waiting around
12/1/2023	3:01pm	DIJOSEPH	HART	Maybe I got the number wrong
12/1/2023	3:01pm	HART	DIJOSEPH	Try again
12/1/2023	3:01pm	DIJOSEPH	HART	Give her mine
12/1/2023	3:03pm	DIJOSEPH	HART	I just did!!
12/1/2023	3:04pm	HART	DIJOSEPH	It must b the wrong number she’s calling u
12/1/2023	3:04pm	DIJOSEPH	HART	Want last 4? I had you repeat
12/1/2023	3:06pm	HART	DIJOSEPH	7918 right
12/1/2023	3:07pm	HART	DIJOSEPH	She’s still waiting I believe
12/1/2023	3:07pm	DIJOSEPH	HART	No!!!!
12/1/2023	3:09pm	DIJOSEPH	HART	Retard!!! Not even close!!! She called

12/1/2023	3:10pm	DIJOSEPH	HART	You said 5580 repeated it!
12/1/2023	3:10pm	HART	DIJOSEPH	Things goodh
12/1/2023	3:10pm	DIJOSEPH	HART	Yes

20. In the above exchange, HART referenced a female who was “waiting around” for DIJOSEPH and provided DIJOSEPH with four numbers: 7918. Based on the contents of the text exchange, their discussion of calling “her,” and having the “number wrong”, it is believed 7918 was a reference to the last four digits of a telephone number.

21. Wyatt Professional Standard Unit conducted a review of telephone numbers associated with Detainees at Wyatt and found that telephone number [REDACTED], was associated with HANASA STEDFORD, New Haven, Connecticut.

22. A subpoena was issued to T-Mobile for subscriber information related to telephone number [REDACTED]. The following subscriber information was provided: [REDACTED]
[REDACTED], New Haven, CT.

23. STEDFORD’s Connecticut RMV record stated that she resides at [REDACTED]
[REDACTED], New Haven, CT.

STEDFORD and Detainee Samuel DOUGLAS Discuss Obtaining and Delivering Contraband Three Days Before DIJOSEPH’s Visit

24. Wyatt records indicated that the telephone number [REDACTED] associated with STEDFORD had contact with Wyatt Detainee Samuel DOUGLAS⁹.

25. Based upon the information developed above, Wyatt personnel reviewed STEDFORD and DOUGLAS’ recorded telephone calls.¹⁰ On November 28, 2023, at

⁹ Samuel DOUGLAS was charged in the District of Connecticut with narcotics distribution and firearm possession offenses.

¹⁰ Wyatt Detention Center protocols records Detainees’ electronic communications other than communication with legal counsel. At the beginning of each video and telephone call, a pre-recorded message is played advising the parties that the call will be recorded.

approximately 11:47am, DOUGLAS made a recorded telephone call to STEDFORD. During the call, STEDFORD referred to herself as DOUGLAS' girlfriend. DOUGLAS asked STEDFORD "if it cleared up or still looked the same." STEDFORD replied that it looked the same.

DOUGLAS and STEDFORD continued and had the following conversation:

DOUGLAS: "Ummm and what you got it in? You heard me?"

STEDFORD: "Huh?"

DOUGLAS: "I said, what you got it in."

STEDFORD: "Remember ummm, well dang, you can't get it like that, but it's like in um a yellow folder and a clear folder."

DOUGLAS: Alright, make sure you tell um [unintelligible] come get it or meet her and give it to her.

STEDFORD: "You tell what?"

DOUGLAS: "Make sure to tell [unintelligible] to come get it or meet her and give it to her."

STEDFORD: "Well, don't say make sure I tell her. You didn't ever tell me nothing. So, am I like..."

DOUGLAS: Yes, I, tell, I'm quite sure he told her already he told her already but, I'm not, you know.

STEDFORD: [Unintelligible] I'm not going all the way to see her.

26. Later that day around 3:44 pm, DOUGLAS and STEDFORD had a second recorded telephone call. DOUGLAS told STEDFORD his brother would send her \$300 via Apple Pay and STEDFORD should send \$410 to "Gianna." When STEDFORD asked what the

money was for, DOUGLAS replied “everything,” “you know exactly what I’m talking about,” and “it ain’t for free bae.” STEDFORD then told DOUGLAS she had not talked to “her” today; DOUGLAS responded that she should talk to “her” today or tomorrow. STEDFORD told DOUGLAS that “she never reached out to come get them.” When STEDFORD complained about driving, DOUGLAS said to “tell her to come get them.” DOUGLAS also stated that he would tell an unidentified “him” to “tell her to go get them.”

27. Two days later, on November 30, 2023, at approximately 7:24 pm, DOUGLAS and STEDFORD had another recorded video call. During the call DOUGLAS told STEDFORD, “you got to get those from her and bring them with you tomorrow, ok?” STEDFORD replied “ok” before the call ended.

STEDFORD Visits DOUGLAS at Wyatt on December 1, 2023

28. On December 1, 2023, at approximately 1:00 pm, STEDFORD went to Wyatt, completed a Notification to Visitors Request to Visit Detainee Form, and had a recorded, non-contact visit with DOUGLAS. A video still of STEDFORD in the lobby area at Wyatt is below. STEDFORD is depicted standing up wearing jeans with a tan colored long sleeve shirt, black and white sneakers and wearing eyeglasses.



29. During their recorded, non-contact visit DOUGLAS told STEDFORD, “Somebody going to come here and meet you, supposed to be here after we’re done.” The visit concluded at approximately 2:30 pm and STEDFORD left the facility.

30. At approximately 3:05 pm on December 1st, DOUGLAS made a recorded telephone call to STEDFORD. DOUGLAS told STEDFORD she had the wrong number and asked her to write down and call [REDACTED]. DOUGLAS told STEDFORD he would call her back in five minutes, and STEDFORD said she was about to pull in now.

31. The number DOUGLAS gave STEDFORD ([REDACTED]) is the telephone number associated with the Law Office of Theresa M. DIJOSEPH, Woburn, Massachusetts. Based on review of T-Mobile subscriber records, the following name and address is associated with the 4454 number: THERESA DIJOSEPH, [REDACTED], Woburn, Massachusetts. T-Mobile records also show that on December 1, 2023, at approximately 3:07pm, the telephone number associated with STEDFORD made an outgoing call to [REDACTED], the telephone number associated with DIJOSEPH.

STEDFORD Provided Contraband to DIJOSEPH Outside of Wyatt on December 1, 2023

32. On December 1, 2023, at approximately 3:56pm, DOUGLAS made a recorded telephone call to STEDFORD. During the call STEDFORD is heard telling DOUGLAS, “this is the lady, hold on.” There is a brief silence on the line during which I believe STEDFORD took a call from DIJOSEPH, and then STEDFORD returned to the call with DOUGLAS.

33. T-Mobile records show that on December 1, 2023, at 4:00 pm, the telephone number associated with STEDFORD received an incoming phone call from the telephone number associated with DIJOSEPH. The call lasted approximately 25 seconds.

34. Continuing the call on December 1, 2023, DOUGLAS asked STEDFORD: “what she say though?” STEDFORD told DOUGLAS, “she just got off the exit” and should be there in “five or six minutes.” DOUGLAS told STEDFORD to “remember, just the folder.”

35. Based on the previous conversations between DOUGLAS and STEDFORD, I believe the “folder” referenced by DOUGLAS in the above conversation is the same “yellow folder” referenced by STEDFORD in their recorded telephone conversation on November 28, 2023, when DOUGLAS asked STEDFORD “what you got it in?”

36. T-Mobile records show that at approximately 4:09 pm, the telephone number associated with STEDFORD received another incoming call from the telephone number associated with DIJOSEPH (while STEDFORD was still on the recorded line with DOUGLAS). The second call from DIJOSEPH lasted approximately 10 seconds.

37. When STEDFORD returned to the recorded call with DOUGLAS, she told him the “lady” was there. There is then a brief silence on the line, during which I believe STEDFORD met DIJOSEPH to hand her the folder with the contraband papers. In the recorded call that was still ongoing between STEDFORD and DOUGLAS, STEDFORD said, “She is

clearing her seat. I don't want to get in her car." STEDFORD can then be heard getting out of her car and speaking with a female in the background. STEDFORD then returns to the call with DOUGLAS and tells him that the female (believed to be DIJOSEPH) told her, "You got it all written on, you're the best." Based on my training and experience, I believe STEDFORD was referring to a comment from DIJOSEPH about the paperwork containing contraband STEDFORD gave her in the manila folder. The ten pieces of paper seized from DIJOSEPH contained printed text regarding capital punishment cases. Based on my training and experience I know detainees and co-conspirators tend to print various writings on the K2-soaked paper in attempt to conceal their illegal activity and make the paper containing contraband appear to be legal paperwork. STEDFORD then told DOUGLAS she would not get home until 7:05 pm and ended the recorded call.

Wyatt's Video Footage of STEDFORD and DIJOSEPH Meeting Outside Wyatt

38. A review of surveillance video obtained from security cameras that cover the entrance of the Wyatt Receivables and Deliveries area and Blackstone Street outside Wyatt shows the following:

39. On December 1, 2023, at approximately 4:06 pm a silver colored sedan, with darkly tinted windows was parked on Blackstone Street, Central Falls, near the Receivables and Deliveries entrance to Wyatt.

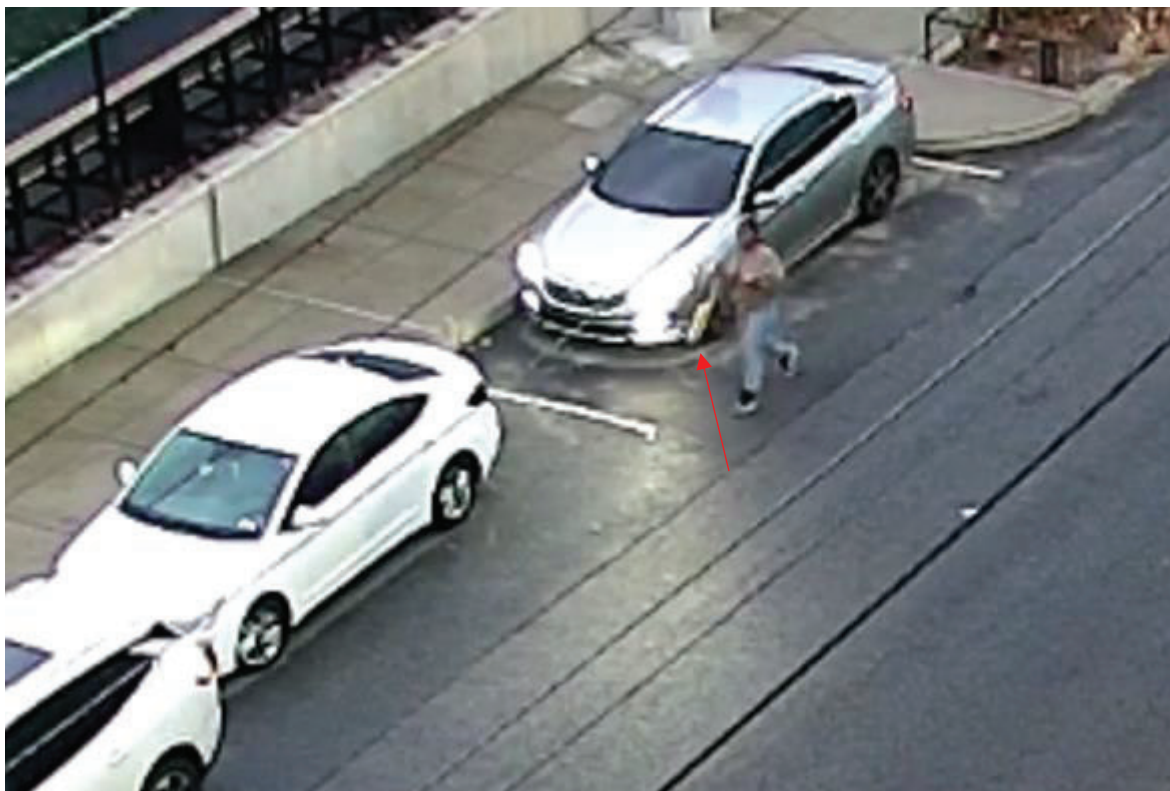
40. A motor vehicle search for the State of Connecticut found that a Hanasa STEDFORD has a 2017, silver, Honda Accord Sport Special Edition registered in her name.

41. At approximately 4:10 pm, a white SUV with two sunroofs parked two cars away from the silver sedan on Blackstone Street. This is one minute after DIJOSEPH called STEDFORD for the second time to tell her she had arrived.

42. A motor vehicle search for the Commonwealth of Massachusetts found that DIJOSEPH had a 2021 white Buick Enclave SUV registered in her name.

43. At approximately 4:11 pm, a black female, wearing jeans, black and white sneakers and a tan colored top exited the silver sedan. I believe this to be STEDFORD because the female is visually similar to STEDFORD and wearing similar clothing as STEDFORD was when she was documented in a security camera still capture in Wyatt's lobby earlier that day.

44. A review of the video footage showed the individual believed to be STEDFORD carrying what appears to be a manila folder in her right hand (as shown by the red arrow below) and a cellular phone in her left hand.



45. Agents believe the manila folder carried by STEDFORD is the “yellow folder” referenced by STEDFORD during the recorded phone call with DOUGLAS on November 28, 2023, (*see* paragraph 25) and the “folder” referenced in the earlier recorded telephone

conversation with DOUGLAS when he told STEDFORD: “remember, just the folder”
(see paragraph 34).

46. As shown in the image below, STEDFORD walked to the passenger side of the white SUV. A white individual is observed in the driver’s seat. STEDFORD passed the manila folder she was carrying to the driver of the white SUV.

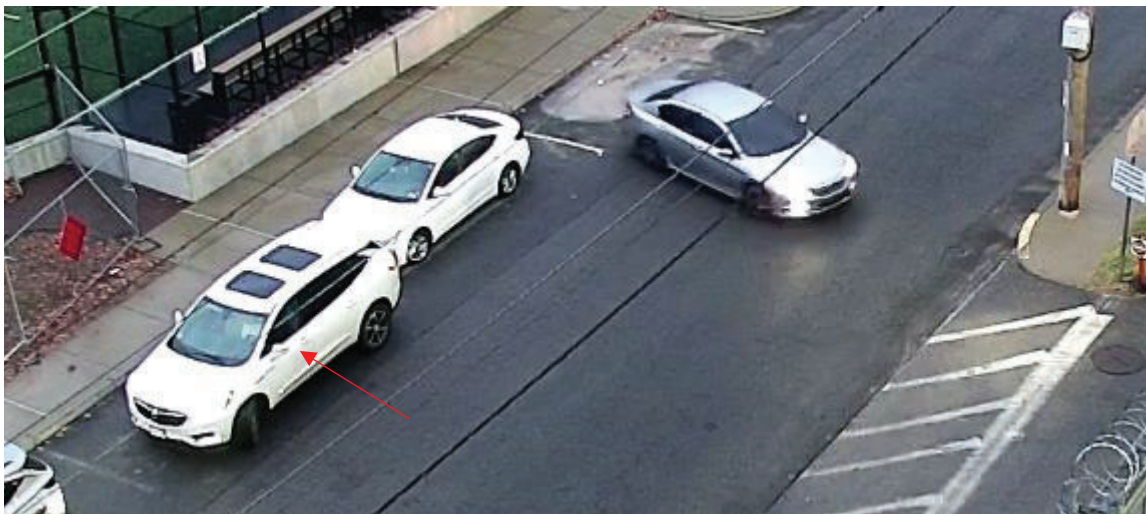


47. Based on the recorded conversation and earlier visit, agents believe the driver of the white SUV is DIJOSEPH, the female DOUGLAS told STEDFORD to meet during their recorded call on November 28, 2023 and the “somebody” that DOUGLAS told STEDFORD she was going to meet her after the in-person visit at Wyatt on December 1, 2023 (see paragraph 29).

48. At approximately 4:12 pm, STEDFORD can be seen closing the passenger side door of the white SUV and walking back to the silver sedan, as shown below. STEDFORD then entered the sedan and drove away from Blackstone Street.



49. As shown in the image below, the driver of the white SUV can be seen through the windshield holding what resembles a manila folder.



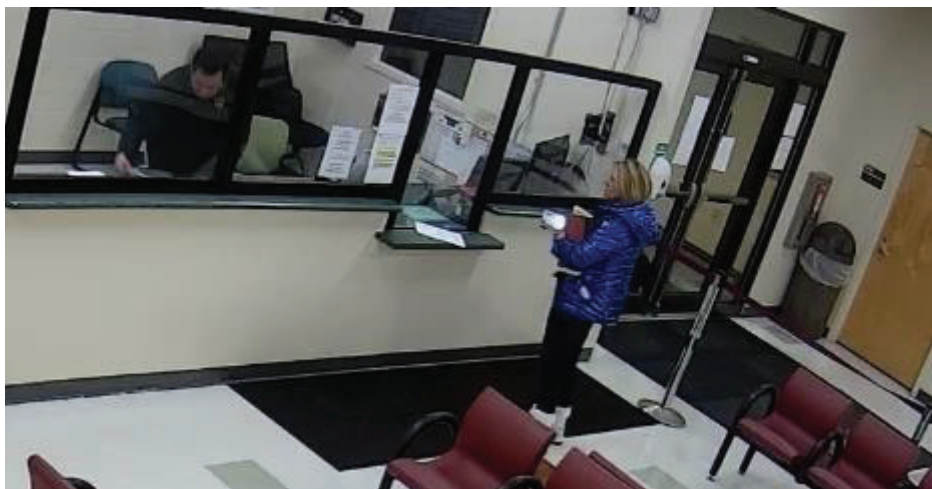
50. At approximately 4:13 pm, DIJOSEPH texts HART and asks, “are you in lockdown?” Two minutes later, she asks, “Hello? Can I go in??” and HART responds, “U can come in yes.”

51. As shown in the two images below, at approximately 4:19 pm, an individual with light colored hair, wearing a dark shirt and pants and white shoes, exits the passenger side of the white SUV. The individual puts on a blue-colored coat, picks up a black bag and what appears to be a stack of papers and heads towards High Street and the entrance to Wyatt.



DIJOSEPH Brings 10 Pages of Contraband into Wyatt to Provide to HART

52. On December 1, 2023, at approximately 4:24 pm video surveillance shows DIJOSEPH enter Wyatt wearing a blue coat, dark pants and white shoes. Below is a video still from December 1, 2023, of DIJOSEPH in the lobby of Wyatt.



53. On December 1, 2023, DIJOSEPH completed and signed Wyatt’s “Notification to Visitors and Request to Visit Detainee Form,” as shown below. On the form, she indicated she was there to visit SHAWN HART and identified her relationship to HART as “Attorney” and checked the box “No” when asked if she is the official attorney of record.

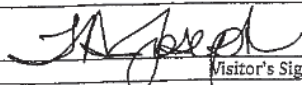
54. As shown below, the form contained a statement that DIJOSEPH acknowledged she understood it was “unlawful to bring upon the institution grounds any weapons, intoxicants, drugs or other contraband” and that “all persons entering upon these premises are subject to searches of their person, property (including vehicle), and packages.”



DONALD W. WYATT DETENTION FACILITY
NOTIFICATION TO VISITORS AND REQUEST TO VISIT DETAINEE FORM

WN 50704
 REV 3/1/2023

Date: 12/1/23	Officer's Name:	Time:	Housing Unit:
TO BE COMPLETED BY INDIVIDUALS 18 YEARS OR OLDER			
It is unlawful to bring upon the institution grounds any weapons, intoxicants, drugs, or other contraband. This applies to any person who provides, or attempts to provide to a detainee anything whatsoever without the knowledge and consent of the Warden. All persons entering upon these premises are subject to searches of their person, property (including vehicle), and packages. The Warden, upon reasonable suspicion that a person may be introducing contraband or demonstrating actions that might otherwise endanger the institution safety, security, or good order, may request the person, as a prerequisite to entry, to submit to a visual search, or other comparable test. A visitor may refuse a search or test, which will result in the visitor not being permitted to enter the institution. Smoking is prohibited on institutional grounds. Please advise the officer if you need life threatening medication during your visit. If so, the officer will maintain the medication at the Inner Lobby Desk.			
I request to visit detainee: Shawn		Hart	
Print Detainee's First Name		Print Detainee's Last Name	
Have you ever been convicted of a felony?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, when?	
Have you ever served time in a penal institution?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, when?	
Are you a United States Citizen?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no, what country?	
What is your relationship to the detainee?	Attorney		

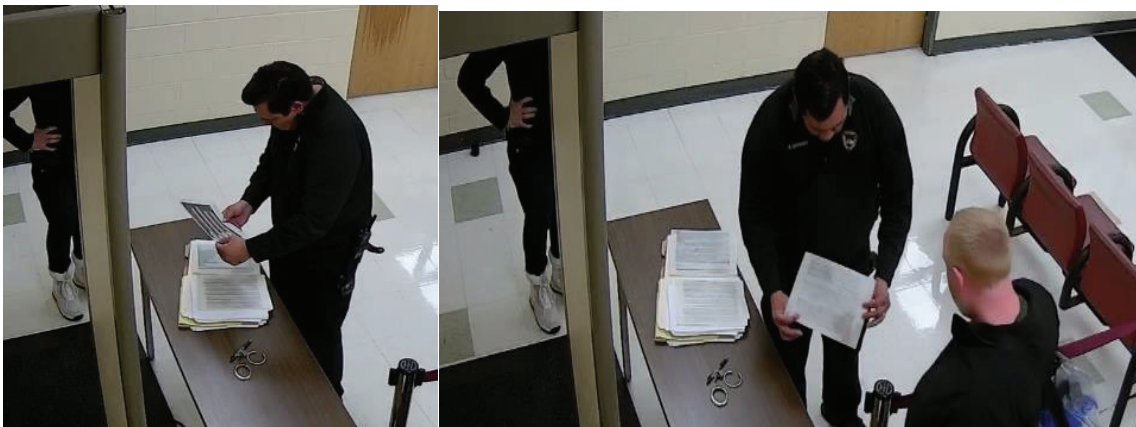
Print First Name	Print Last Name	Date of Birth
By signing below I acknowledge that I have read and understand the information on this form and posted in the lobby. My signature may be deemed as my consent and knowledge that the conversations I have on the visiting room telephone with the detainee listed are recorded and may be monitored. Also, the information I have provided on this form is true and correct.		
 Visitor's Signature	12/1/23 Date	
Visitor information has been updated and/or entered in the computer by:	Staff name	

55. The form also states, "I declare that I do not have any articles in my possession which I know to be a threat to institutional security." DIJOSEPH signed and dated the form.

56. At approximately 4:31 pm, video footage shows DIJOSEPH walking towards and through the metal detector and a correctional officer beginning a search of the materials she intended to bring into her contact visit with HART.



57. At approximately 4:32 pm, video footage shows the correctional officer reviewing various pieces of paper in manila folders DIJOSEPH had with her. The correctional officer then further examined one of many pages brought into Wyatt by DIJOSEPH. The officer put the piece of paper closer to his face and appears to smell the paper, then shows it to another Wyatt correctional officer. This is shown in the still shots from the security video below. DIJOSEPH can be seen standing in the background.



58. The correctional officers then requested a supervisor to come to the lobby to inspect the sheets of paper. The supervisor, based on his experience identifying drugs within the correctional facility, confiscated 10 sheets of paper believing them to contain K2 or synthetic marijuana.

59. When questioned about the papers, DIJOSEPH told correctional officers that she “had picked the sheets up from her printer and just brought them here.”

60. DIJOSEPH was advised by correctional officers that her visitation rights had been revoked. DIJOSEPH told the correctional officers that she understood and then stated, “Okay I understand, but how long does this last? This feeling, when does it go away? I cannot drive like this.” During this time the correctional officer who had handled the papers directly was receiving medical attention.

61. At approximately 4:57 pm, DIJOSEPH gathered her remaining paperwork and exited Wyatt.

DIJOSEPH Communicates with HART Immediately After Leaving Wyatt

62. On December 1, 2023, at approximately 5:00 pm, minutes after leaving the lobby of Wyatt, DIJOSEPH sent HART the following text messages:

<i>Date</i>	<i>Time</i>	<i>From</i>	<i>To</i>	<i>Message</i>
12/1/2023	5:00pm	DIJOSPH	HART	No visits terminated permanently. They found papers with drugs on them?? I feel so so light headed and messed up.
12/1/2023	5:01pm	DIJOSEPH	HART	CO had to leave post too because he handled them !!!

12/1/2023	5:02pm	DIJOSEPH	HART	I can't even drive
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63. Additionally, T-Mobile records show that on December 1, 2023, at approximately 6:11 pm, the telephone number associated with STEDFORD attempted to make an outgoing call to the telephone number associated with DIJOSEPH. The call was not completed.

DIJOSEPH Communicates with HART About the Contraband on December 4, 2023

64. On December 4, 2023, at approximately 12:02pm, HART and DIJOSEPH had the following text exchange about the papers confiscated by Correctional Officers on December 1, 2023:

<i>Date</i>	<i>Time</i>	<i>From</i>	<i>To</i>	<i>Message</i>
12/4/2023	12:02pm	HART	DIJOSEPH	How many pages did they say allegedly say have shit on them or what not they supposedly test everything or did they lie to you about more? What's your plans for Christmas anything good? I'm sorry your exhausted?
12/4/2023	12:14pm	DIJOSEPH	HART	Honestly honey. I didn't see them or knew that I touched them. I have no clue how many were there. Maybe 4? That's my best guess. When he held the pages up, they were a different color. My letterhead I use is different color too. I've got no explanation. I should've seen that but CO's reaction to it? How did I handle it without the same reaction? Idk. Well I am getting presents per usual. The boys are already spoiled but still

				want things lol. Any my birthday is the [XXXX] which I'm sure you remembered lol
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65. In the above text exchange HART is asking DIJOSEPH how many pieces of paper were seized by the correctional officer as contraband. In DIJOSEPH's response she said that the pages confiscated by the correctional officer were a different color than the other paperwork she brought into Wyatt. The difference in color was one of the indications to the correctional officers that the paper contained contraband. Based on my own training and experience and working these types of matters, paper soaked with K2 or synthetic marijuana can be identifiable by its brownish, stained color.

66. On January 10, 2024, at approximately 10:01 am HART and DIJOSEPH had another text exchange about the papers confiscated by Correctional Officers on December 1, 2023:

<i>Date</i>	<i>Time</i>	<i>From</i>	<i>To</i>	<i>Message</i>
1/10/2024	10:01 am	DIJOSEPH	HART	I'm so mad at you. Why can't you just swoop me away from this madness? Not forever...just a weekend...what do you think about writing the warden?? Do you think he'll believe me? That I didn't know it was in there? I had the same reaction as the CO when he found those papers that were dingy yellow with a pungent odor that made me sick. I had no idea that was in there!
1/10/24	12:38 pm	HART	DIJOSEPH	You can try nothing to lose I guess it happens all the time to lawyers people ask if they can give I them and they do and

				there goes that. They are being really good about it tho But its still happening and we don't have visits and haven't had in about a month so this proves shit you know
1/10/2024	2:42 pm	DIJOSEPH	HART	Sent him a letter.
1/10/2024	3:01 pm	HART	DIJOSEPH	Ok that's good let's see what happening
1/10/2024	3:08 pm	DIJOSEPH	HART	Nothing bad will happen just from explaining myself right? Yes, I know I'm street dumb!
1/10/2024	3:22 pm	DIJOSEPH	HART	Hey you never answered my questions! And Shawn, I didn't want to bring it up, I never do! I know you have people clawing you for money. But I've been the least quiet about it. is there \$\$\$ something that you've setting aside for me? I hate asking but it is what it is?
1/10/2024	3:39 pm	DIJOSEPH	HART	You remember your boy or that cuz from Wyatt? Do you have access to him?
1/10/2024	3:41 pm	DIJOSEPH	HART	Answer my question. I'm insecure, either you're a great snake charmer or Jupiter Judy they effective
1/10/2024	4:02 pm	DIJOSEPH	HART	I hate texting. You're either a good snake charmer or you care. You never say it. No! I wasn't needy when I saw you. So, now I'm needy!. There could be worst things.
1/10/2024	4:09 pm	HART	DIJOSEPH	No nothing will happen to u you had no idea. I've lost so much money its crazy I'm actually going to b fighting when we are unlocked BC I owe \$300 and I can't pay it so what's that tell u

				I'm working on another way to make money
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67. In the above text exchange, DIJOSEPH asked HART “do you think he’ll believe me” referring to whether the Warden would believe that she did not know the drug-soaked papers were in her file when she tried to enter the facility.

DIJOSEPH’s email to WYATT WARDEN on January 10, 2024

68. As she stated in the text to HART, on January 10, 2024, DIJOSEPH emailed Wyatt’s Warden to request she be allowed to resume visits with HART. She claimed in the email that she needed to visit HART to assist with a custody issue with his children.¹¹ Within the email DIJOSEPH referenced the December 1, 2023 visit and stated, “I was absolutely horrified and disgusted that there were papers inside my client’s file that I was completely unaware were in there.” (This is different than when she told the correctional officers on December 1 that she had taken the papers off of her printer.) She further stated in the email to the Warden that she has “seen every kind of drug possible” within her Department of Children and Families work and can “unequivocally state to you that I had no idea that a drug could be put on paper.” DIJOSEPH further stated, “As I attempted to look at the subject papers, I saw the title ‘Capital Punishment.’ That is not applicable to my client and I did not recognize these papers at all. I can say with 100% certainty that those papers were not part of my research.”

INTERVIEW of THERESA DIJOSEPH

69. On May 8, 2024, agents interviewed DIJOSEPH at her home in Woburn, Massachusetts. DIJOSEPH told agents she was a public defender for the Massachusetts

¹¹ As described above, based on a review of court records in the two custody disputes in Maine and New Hampshire, DIJOSEPH is not an attorney of record in either matter.

Department of Children and Families, and also represented private clients and is licensed to practice law in Massachusetts.

70. When asked about visits to Wyatt, DIJOSEPH stated she was aware of the difference between friends and family visits and attorney visits, and she knew that friends or family could not bring in paperwork to detainees.

71. According to DIJOSEPH, she and HART met prior to his incarceration for the federal case in Massachusetts. They were friends and then HART mentioned he needed legal help. DIJOSEPH claimed she has a fee agreement with HART but he has never paid her.¹² HART was one of DIJOSEPH's private clients that she has kept.

72. DIJOSEPH told agents she does not represent HART in his criminal matter. She said that at the time of HART's arrest, she was counseling him about a hearing or modification of visitation rights related to his two children who resided in New Hampshire. HART also has another daughter who lives in Maine with her mother. DIJOSEPH stated there are various custody issues, including one involving HART's mother who is seeking grandparent visitation. DIJOSEPH claimed she would provide HART with affidavits and legal research but that she was not representing HART or his mother in either proceeding. DIJOSEPH also stated that HART's matter was no longer a priority for her as he had been arrested and would not get visitation rights.

73. DIJOSEPH told agents she would speak to HART at Wyatt on the phone infrequently, and they would send tablet messages. DIJOSEPH said she understood those

¹² In fact, a review of some of their text communications shows that DIJOSEPH frequently pays HART by depositing money on his commissary account or transferring money to other Cash App users at his direction.

methods of communicating were monitored and that she never said anything confidential over the phone or via tablet message.

74. Agents asked DIJOSEPH about the email she wrote to Wyatt's Warden on August 26, 2023, in which she stated she was working for HART pro bono. DIJOSEPH stated she may have been referring to work she was doing for HART's mother as she had a fee agreement with HART.

DIJOSEPH's Statements About the December 1, 2023 Visit

75. DIJOSEPH told agents she needed to see HART on December 1, 2023, because he must have made a correction to the document she says she provided him the night before.

76. DIJOSEPH told agents that on December 1, 2023, she traveled from work to Wyatt. She parked her vehicle, which she described as a big, white car, on a side street by Wyatt, and entered Wyatt. DIJOSEPH told agents she did not speak to anyone at Wyatt other than the correctional officers, and she did not intentionally accept any gifts or packages from anyone.

77. DIJOSEPH recalled the paperwork seized by the correctional officers on December 1, 2023, and told agents it was case law related to capital murder. She acknowledged she would have no reason to bring that into Wyatt. DIJOSEPH claimed that when the correctional officer inspected it, she immediately recognized the paperwork was not hers because of the color and tinge of the paper and the subject matter that was printed on it.

78. When agents asked where the paperwork could have come from, DIJOSEPH stated that she "has racked her brain" since December 1 to try to figure out where the paperwork came from and determine who would have had access to her files. DIJOSEPH stated she went to a Staples store earlier in the day on December 1 to print some materials and she believed the

paperwork was added to her files when she was at Staples. When pressed, however, DIJOSEPH could not recall which Staples she had visited and did not have a receipt.

79. DIJOSEPH also stated she could not understand how drugs could be put onto paper. DIJOSEPH stated she was not light-headed at all while at Wyatt. The correctional officers did not initially tell DIJOSEPH what they believed the paper to contain. She does remember having to use the bathroom. DIJOSEPH was told she was no longer invited to Wyatt. DIJOSEPH said she was frightened going home, and told agents she was happy that there weren't any handcuffs brought out by the correctional officers on December 1.

80. Agents then showed DIJOSEPH several pieces of evidence¹³ obtained during the investigation. After being shown the photographs of her meeting STEDFORD outside of Wyatt and the text messages she exchanged with HART, DIJOSEPH told agents that an unknown female had come to her car window and asked DIJOSEPH if she was going to Wyatt. The female put down a file of stuff. DIJOSEPH told agents she did not accept the folder and did not bring anything into Wyatt, and the female left with the folder.

81. After additional questioning, DIJOSEPH further changed her story and told agents that she obtained a telephone number from HART and spoke with a female on the phone on December 1, 2023. DIJOSEPH told agents this was the only time she met the female and accepted something. DIJOSEPH stated that she thought accepting the papers was harmless and did not know what was on the papers. DIJOSEPH stated that she did not know if she was helping HART or his friends by meeting the female and accepting the papers.

82. DIJOSEPH stated that she did not look at what the female gave her, but it looked like legal paperwork. DIJOSEPH could not say for sure the papers provided by the female were

¹³ Agents showed DIJOSEPH screen shots of video footage obtained from Wyatt, and tablet messages exchanged between her and HART.

the same as the legal paper seized by the correctional officers. DIJOSEPH further stated that the folder provided by the female was huge and DIJOSEPH took the papers out of a plastic protector. DIJOSEPH stated that she does not know how many pages she was given by the female, but estimated it to be between 10 and 20. DIJOSEPH stated that she put the pages straight in the middle of her file and brought the file into Wyatt. DIJOSEPH stated that she planned to tell HART that she had the papers and would have given the papers to HART if he asked.

83. DIJOSEPH stated the reason she took the papers from the female was for HART. HART told DIJOSEPH that someone was going to meet with her, and he provided the phone number of the female she was supposed to meet.

84. DIJOSEPH said that she and HART did not discuss HART paying her for bringing the papers to Wyatt, but she believed that HART would pay her back in some way when he got out of Wyatt. DIJOSEPH told agents she did not want to ruin her career and that she knew it was wrong to take something from a stranger.

85. DIJOSEPH told agents that she and HART had talked about having an intimate relationship. DIJOSEPH said she had feelings for HART, but that nothing was ever going to happen between them because she is married and he has a girlfriend.

CONCLUSION

86. The statements provided in the email dated January 10, 2024, regarding DIJOSEPH's knowledge of the seized papers were not consistent with records provided by Wyatt which included text messages and statements made by DIJOSEPH. As documented in tablet messages on December 1, 2023, communications show that DIJOSEPH and HART were discussing whether DIJOSEPH was meeting that day with an unidentified female, believed to be

STEDFORD. Through Wyatt communication records it appears DIJOSEPH was told by HART, who was directed by DOUGLAS, to have DIJOSEPH meet STEDFORD outside of Wyatt on December 1, 2023. Wyatt surveillance records show two vehicles believed to be operated by STEDFORD and DIJOSEPH arrive and park on Blackstone Street. The surveillance footage then shows a female believed to be STEDFORD get out of her vehicle with a folder and walk to the passenger side of a white SUV believed to be DIJOSEPH's before returning to her vehicle and departing. In the video call between STEDFORD and DOUGLAS, STEDFORD can be heard speaking with a female in the background, shortly after she exits her vehicle to pass the manila folder. STEDFORD then told DOUGLAS that the female, believed to be DIJOSEPH told her "You got it all written on you're the best." Shortly thereafter, DIJOSEPH exits her vehicle and enters Wyatt to visit with HART. Upon ten pages of paperwork being seized from DIJOSEPH, DIJOSEPH states after being questions about the paper's origin, that she "had picked the sheets up from her printer and just brought them here."

87. Based on my training and experience detainees use coded language when discussing contraband via phone, video call and text to avoid detection by law enforcement. When discussing contraband detainees use vague terms to describe contraband and the delivery of contraband. Based on my experience working correctional contraband matters, I believe, based on the language used, STEDFORD and DOUGLAS are discussing the pages of synthetic marijuana brought into Wyatt by DIJOSEPH.

88. Based on all the foregoing, I submit that there is probable cause to support a criminal complaint charging DIJOSEPH with violations of Title 21, U.S.C. § 841 (Possession with Intent to Distribute a Controlled Substance), Title 18, U.S.C. § 1791, (Providing a Prohibited Object to an Inmate) and Title 18, U.S.C. § 1001 (Making a Materially False, Fictitious, or

Fraudulent Statement), and HANASA STEDFORD, YOB: 2002 of New Haven, CT, SHAWN DAVID HART, YOB: 1978, and SAMUEL DOUGLAS, YOB: 1998 with violations of 21 U.S.C. § 846 (Conspiracy to Possess with Intent to Distribute a Controlled Substance) and Title 18, U.S.C. § 1791, (Providing a Prohibited Object to an Inmate).

89. I further request that the Court order that all papers in support of this application, including the affidavit, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation, including by giving targets an opportunity to destroy or tamper with evidence, change patterns of behavior, notify confederates, and flee from prosecution.

Respectfully submitted,



Pepper M. Daigler, Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1. by: **Telephone** (specify reliable electronic means)

Sworn telephonically and signed electronically

July 23, 2024

Date


Judge's signature

Providence, Rhode Island
City and State

Patricia A. Sullivan, U.S. Magistrate Judge
Printed Name and Title