

Approved: Michael D. Neff
MICHAEL D. NEFF
Assistant United States Attorney

Before: THE HONORABLE GABRIEL W. GORENSTEIN
Chief United States Magistrate Judge
Southern District of New York

21 MAG 9354

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UNITED STATES OF AMERICA :
:
-v.- :
:
CHANETTE LEWIS, :
a/k/a "Netty Hott," :
TATIANA BENJAMIN, :
a/k/a "Ta Banks," :
a/k/a "Lyric Muvaa," :
TATIANA DANIEL, :
a/k/a "Kimora Daniel," and :
HEAVEN WEST, :
:
Defendants. :
:
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SEALED COMPLAINT
Violations of 18
U.S.C. §§ 1343, 1349,
1346, 1028A, 641, & 2
COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

JARED EANNUCCI, being duly sworn, deposes and says that he is a Special Agent with the United States Attorney's Office for the Southern District of New York, and charges as follows:

COUNT ONE
(Wire Fraud)

1. From at least in or around April 2020 up to and including July 2020, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of

executing such scheme and artifice, and aided and abetted the same, to wit, the defendants defrauded New York City's COVID-19 Hotel Room Isolation Program (the "Program") -- which was intended to provide hotel rooms, free of cost, for patients convalescing from COVID-19 and for healthcare workers who needed to self-isolate because of exposure to COVID-19 -- by falsely claiming to be healthcare workers, by misappropriating actual healthcare workers' identifying information, and by selling these hotel rooms to those who did not meet the Program's requirements, and sent and received interstate wires to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Sections 1343 & 2.)

COUNT TWO
(Wire Fraud Conspiracy)

2. From at least in or around April 2020 up to and including July 2020, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

3. It was a part and an object of the conspiracy that CHANETTE LEWIS, a/k/a "Netty Hott," TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, knowingly would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, the defendants defrauded the Program -- which was intended to provide hotel rooms, free of cost, for patients convalescing from COVID-19 and for healthcare workers who needed to self-isolate because of exposure to COVID-19 -- by falsely claiming to be healthcare workers, by misappropriating actual healthcare workers' identifying information, and by selling these hotel rooms to those who did not meet the Program's requirements, and sent and received interstate wires to and from the Southern

District of New York and elsewhere, in furtherance of that scheme, in violation of Title 18, United States Code, Section 1343.

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

COUNT THREE
(Honest Services Fraud)

4. From at least in or around May 2020 up to and including June 2020, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, having devised and intending to devise a scheme and artifice to defraud, and to deprive her employer -- a call center in New York City ("Call Center-1") that handled phone calls and certain reservations for the Program -- of its intangible right to her honest services, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice to defraud, and aided and abetted the same, to wit, using online accounts, LEWIS abused her employment at Call Center-1 to secure Program hotel rooms for non-qualifying individuals in exchange for payment, and LEWIS sold healthcare workers' personal identifying information -- to which she had access by virtue of her employment at Call Center-1 -- to co-conspirators in exchange for a fee, in order to abuse and profit from the Program.

(Title 18, United States Code, Sections 1343, 1346, and 2.)

COUNT FOUR
(Aggravated Identity Theft)

5. From at least in or around May 2020 up to and including July 2020, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," and TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," the defendants, knowingly transferred, possessed, and used, 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, LEWIS and BENJAMIN transferred, possessed, used, and aided and abetted the transfer, possession, and use of, the names and other personal identification information of healthcare workers as part of committing the offenses charged in Counts One and Two of this Complaint.

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

COUNT FIVE
(Unemployment Benefits Fraud)

6. From in or around November 2020, up to and including the present, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, willfully and knowingly embezzled, stole, and converted to her own use or the use of another, money of the United States exceeding \$1,000 in value, to wit, LEWIS secured a total of more than \$45,000 in unemployment benefits by claiming falsely that she had not been employed since February 2020 due to a lack of work because of the COVID-19 pandemic, when in truth and fact, LEWIS was employed for at least some of that period at Call Center-1, and LEWIS's employment there ceased not because of the COVID-19 pandemic but because LEWIS stopped showing up to work in or around June 2020.

(Title 18, United States Code, Section 641.)

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

7. I am a Special Agent with the United States Attorney's Office for the Southern District of New York ("USAO-SDNY"), and I have been personally involved in the investigation of this matter. My duties and responsibilities include the investigation of financial crimes, such as wire fraud, mail fraud, identity theft, money laundering, computer crime, and theft from the Government. This affidavit is based on my personal participation in this investigation, my examination of reports, records, videos, audio recordings, and photographs, and my conversations with other individuals, including other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offenses cited above, it does not include all the facts that I have learned during this investigation. Where the contents of documents, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Moreover, all dates and numbers are approximate.

THE FRAUD SCHEME INVOLVING NEW YORK CITY'S COVID-19 HOTEL PROGRAM

Overview of the Fraud Scheme

8. In response to the COVID-19 pandemic, New York City created the COVID-19 Hotel Room Isolation Program (the "Program"), described in greater detail below, which was intended principally for patients convalescing from COVID-19 and for healthcare workers

who needed to be isolated because of exposure to COVID-19. Funded by New York City and the Federal Emergency Management Agency ("FEMA"), the Program provided free hotel rooms for qualifying individuals throughout New York City, including in Manhattan and the Bronx. The Program existed from approximately March 24, 2020 until July 2020.

9. This ongoing investigation has revealed that the fraud scheme has defrauded the federal government and New York City out of more than approximately \$400,000 through fraudulently obtaining hotel rooms from the Program. Specifically, participants in the fraud abused the Program by (1) securing free Program hotel rooms for themselves by claiming falsely that they were healthcare workers, and (2) selling Program hotel rooms to those who did not qualify for them. In various instances, those who bought fraudulently obtained Program hotel rooms threw large parties, and sometimes even engaged in violence.

10. At least one participant in the fraud scheme, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, worked at a particular call center (Call Center-1), which handled phone calls and certain reservations for the Program. As a result of LEWIS's employment, she had access to legitimate healthcare workers' identifying information. As set forth below, LEWIS abused her position, including by misappropriating healthcare workers' personal identifying information, revealing the Program's inner workings to co-conspirators, and making unauthorized sales of Program hotel rooms to those who did not meet the Program's requirements. LEWIS and others advertised and discussed these fraudulently obtained hotel rooms on Facebook.

The COVID-19 Pandemic

11. A novel coronavirus, COVID-19, which causes severe acute respiratory syndrome, first emerged in China in late 2019. COVID-19 is infecting people and spreading easily from person-to-person. It has since infected more than approximately 230 million people in more than 200 countries and territories, and it has caused more than 4.7 million deaths. The first confirmed case of COVID-19 in the United States was in January 2020. By early March 2020, COVID-19 had reached New York State. During March 2020, the World Health Organization declared COVID-19 a pandemic, and the President of the United States declared a national emergency. By late March 2020, New York City was the epicenter of the global health crisis.

The Program

12. Based on my participation in this investigation, including my review of the New York City government website, my review of documents, and my conversations with others, I am aware of the following, among other things:

a. In response to the COVID-19 pandemic, New York City (the "City") created the COVID-19 Hotel Room Isolation Program (the Program). At first, the Program was open only to healthcare workers. Over time, the Program expanded to additional categories of at-risk and/or infected individuals. Thus, in total, the Program was open to (1) patients who had tested positive for COVID-19; (2) individuals who believed, based on their symptoms, that they were infected with COVID-19; (3) individuals who did not have COVID-19 but who lived with someone did; and (4) healthcare workers who needed to isolate because of exposure to COVID-19.

b. As stated on the City's website describing the Program, such individuals "may qualify to self-isolate in a hotel, free of charge, for up to 14 days if you do not have a safe place to self-isolate."¹ The City's website supplied examples of those who may not be able to safely self-isolate -- e.g., "[y]our home does not have space for you to stay six feet away from others"; "[y]ou share rooms or a bathroom"; or "[y]ou live with someone who is vulnerable." Funded by the City and FEMA, the Program provided free hotel rooms for qualifying individuals. As the City's website noted, "This program, including food, linens, and local phone service, is free for eligible New Yorkers."

c. At first, it was not necessary for an individual to provide identification in order to access their hotel room. Then, the City's Office of Emergency Management ("OEM") asked hotels participating in the Program to start checking for valid identification for non-healthcare workers on or about May 15, 2020, and for healthcare workers on or about June 8, 2020. Healthcare workers were also asked to provide their healthcare identification.

d. Those who wished to book a hotel room through the Program could either call a phone number or use an online hotel booking platform. OEM had a call center in New York City (Call Center-1) handle phone calls for the Program from on or about March 24, 2020 to on or about June 8, 2020.

¹ *COVID-19 Hotel Program; Isolation Hotel Program for Those with COVID-19, available at <https://www1.nyc.gov/site/helpnownyc/get-help/covid-19-hotel-program.page> (last visited Sept. 27, 2021).*

e. The Program existed from on or about March 24, 2020 until on or about July 6, 2020 (though the program honored previously booked rooms until the end of July 2020).

The Fraud Scheme

13. Based on my participation in this investigation -- including (among other things) my review of emails, financial records, information provided by hotels to the City, publicly available Facebook posts and videos, Facebook account information obtained through a judicially authorized search warrant, Call Center-1 records, information from a Call Center-1 executive, and my conversations with others, including law enforcement officers -- I am aware of the following, among other things:

a. CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, was a Call Center-1 employee. LEWIS worked at Call Center-1 as a temporary employee, hired specifically for the Program, from in or around April 2020 until in or around June 2020.

b. LEWIS booked a large volume of hotel rooms through the Program. At times, LEWIS misappropriated the personal identifying information of actual healthcare workers, to which she had access by virtue of her employment.

c. LEWIS and various other participants advertised hotel rooms on Facebook, including on portions of their accounts that were openly available to the public over the Internet.

d. LEWIS and other co-conspirators sold fraudulently obtained hotel rooms -- including rooms located in Manhattan and the Bronx -- to customers who were ineligible for the Program. LEWIS and other co-conspirators charged varying amounts depending on the duration of the customers' hotel stay; for example, at one point LEWIS charged \$50 for one night, \$150 for one week, \$300 for two weeks, and \$350 for one month.

e. Customers paid in cash and using electronic payment services such as Cash App, Zelle, Chime, and PayPal. LEWIS advertised to potential customers that, when hotels asked for a healthcare worker's identification, LEWIS would supply a purported paystub and a letter asserting that the individual was (purportedly) a healthcare worker.

f. In addition to selling fraudulently obtained hotel rooms, participants in the scheme also secured free Program hotel rooms for themselves by falsely claiming to be healthcare workers.

g. The federal government and New York City paid more than approximately \$400,000 for the hotel rooms that were diverted as a result of this fraud scheme.

The Defendants

CHANETTE LEWIS

LEWIS's Fraudulent Personal Use of Program Hotel Rooms

14. Based on my analysis of hotel booking records, I have learned that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, fraudulently booked at least approximately 28 nights of rooms from the Program for herself. Specifically:

a. At least approximately 28 nights' worth of hotel rooms were booked in LEWIS' name ("Chanette Lewis"). The individual using these rooms claimed to be a healthcare worker.

b. The email account associated with these bookings is a particular Google email account ("LEWIS Email Account-1"), which is used by LEWIS:

i. Based on my review of Call Center-1 records, I know that LEWIS provided LEWIS Email Account-1 in connection with her employment at Call Center-1.

ii. Based on my review of Google records, I know that LEWIS Email Account-1 is subscribed in LEWIS' name ("Chanette Lewis") and that the account was accessed from an Internet Protocol ("IP") address ending in -161 (the "161 IP Address").² Based on my review of IP address subscriber information, I know that the subscriber for the 161 IP Address is LEWIS's husband.

c. In addition, at least approximately 29 nights of hotel rooms were booked in the names of two individuals believed to be LEWIS's immediate relatives, based on financial records, Facebook records, and records from the New York City Human Resources Administration.

15. I believe that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant was not, in fact, a healthcare worker. Among other things, based on my review of two unemployment insurance ("UI")

² An IP address is a unique, machine-readable numeric address that computers use to identify each other on the Internet (e.g., 123.45.67.890).

applications submitted in 2020 and 2021 under LEWIS's name and personal identifiers, I know that LEWIS claimed prior employment in maintenance and as a call representative in the teleservices industry. Indeed, at a time of unique need for healthcare workers during the COVID-19 pandemic, LEWIS was working at a call center.

LEWIS's Fraudulent Sales of Program Hotel Rooms to Others

16. As set forth herein, based on a combination of hotel booking records, Facebook posts and messages, and Cash App records, I believe that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, fraudulently sold at least approximately 1,936 nights' worth of Program hotel rooms to others.³

Facebook Records

17. I respectfully submit that there is probable cause to believe that a particular Facebook account, with a vanity name of "Netty Hott" (the "LEWIS Facebook Account"), was used by CHANETTE LEWIS, a/k/a "Netty Hott," the defendant. Specifically, based on a review of Facebook records, including records obtained by a Court-authorized search warrant:

a. The LEWIS Facebook Account sent several private messages confirming her identity, including messages in or around April and May 2020 in which she: (1) supplied her name (e.g., "Chanette Lewis"; "Yes u can say me Chanette Lewis I work for omE 311 teleservies"); (2) supplied a photograph of her apparent New York State Driver's License, which contains the name "Chanette S Lewis"; and (3) provided a photograph of an apparent check sent to "Chanette Lewis" from the United States Treasury.

b. The LEWIS Facebook account was accessed from the 161 IP Address.

c. On one occasion, the LEWIS Facebook Account posted an apparent airplane ticket (for a flight from New York to Miami) in the name of "Chanette Lewis".

d. On another occasion, the LEWIS Facebook Account posted a video to Facebook in which a woman stated, in substance and part, "Thank you for calling NYC COVID-19 Hotel hotline, my name is Chanette." I believe that the woman in this video was LEWIS, based on a comparison of this video (which clearly features

³ These fraudulent sales occurred both during and after LEWIS's employment at Call Center-1, which ended on or about June 11, 2020.

the speaker's face) to other photographs and videos of LEWIS, including photographs from a Government database.

18. Based on my review of the contents of the LEWIS Facebook Account, which were obtained pursuant to a search warrant, I know that in the approximate period from April to July 2020, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, used Facebook in furtherance of the scheme. Based on my review of the LEWIS Facebook Account from that period, my training and experience, and my familiarity with this investigation, I believe that the following examples demonstrate LEWIS's involvement in the scheme:⁴

a. Advertisements posted by LEWIS for the sale of Program hotel rooms (e.g., "I'm Doing Hotels 60 Percent 5 star hotels I do not know exactly what hotel u would be place but I know it would be 5 star ★ hotel ... be cash app ready !!"; "Book Today, \$300 For the whole monthhhhhhhhhhhhh !! !! !! !!");

b. Direct communications between LEWIS and potential purchasers of hotel rooms (e.g., "Good evening, basically you would give me your full name I'll make the reservation in the borough you choose . All hotels are 4 and 5 star hotel");

c. Efforts by LEWIS to recruit co-conspirators to help her sell fraudulently obtained Program hotel rooms, including offering a \$100 commission for each room sold (e.g., after receiving a message from another individual stating "I'll sell them for you send videos of the rooms," LEWIS responded, "I got u...For every room u sale for me I give u \$100");

d. Communications in which LEWIS informed customers that she was creating bookings in which she falsely indicated that the customer was a health care worker (e.g., "I'm booking it as u a health care worker");

e. Admissions that LEWIS stole doctors' personal identifying information in furtherance of the scheme (e.g., "I work for 311 oem that how I got doctors licenses and stuff . . . I work in the part that I collect they information and I do and approval the booking . . . I take doctors and stuff certificate numbers and stuff"; "I stole some doctor numbers and emails...I was writing down they employed ID number lmao"; "we book for the doctor

⁴ All communications quoted in this Complaint are in substance and in part, and cited Facebook posts and messages are quoted verbatim herein, including any errors in spelling, grammar, and punctuation, except where otherwise noted.

and health care workers . . . I be stealing they employer id number and license number and stuff"; "I'm taken my job information");

f. Acknowledgements by LEWIS that the program was meant for health care workers (e.g., "That the shit I provide people at my job / It for people who been expose to covid 19 / And health care workers");

g. Statements indicating that LEWIS had fraudulent documents to indicate that customers of the fraud scheme were health care workers (e.g., "IVE JOB LETTERS AND PAYSTUBS"; "Once I get the approval on my end for the hotels than u would send me the money ill send the confirmation along with a job paystub and job letter that is now require");

h. Claims by LEWIS that she made significant money from the scheme (e.g., "I made 16K in 5 days I'm proud of myselfffff"); and

i. Indications that LEWIS had two co-conspirator assistants in the scheme, Kimora Daniel and Ta Banks (e.g., "Kiaomar Daniels and ta banks those are my assistance"; "I've fucking that kiaomara Daniel girl being a middle man for me and her dumb ass let someone bring a kid to a hotel and got kick out."). (Both of these co-conspirators are discussed below.)

19. In addition, during May and June 2020, the LEWIS Facebook account engaged in online conversations with a Facebook account with the vanity name "Ta Banks" (the "BENJAMIN Facebook Account"). As explained in detail below in paragraph 25, I respectfully submit that there is probable cause to believe the BENJAMIN Facebook Account is used by TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," the defendant. These conversations culminated in CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, selling information to BENJAMIN for approximately \$800. Based on my review of these exchanges, I know the following, among other things:

a. During these conversations, LEWIS explained to BENJAMIN that certain "codes" were required to make hotel room reservations, and LEWIS admitted that she was selling these codes to others ("I'm charging people for the codes").

b. During these conversations, LEWIS told BENJAMIN to inform customers that they would need valid identification along with a credit card, but clarified that "the hotel is paid for in full" already; the customer's credit card would be charged only if "they damage propert[y]."

c. On or about June 20, 2020, LEWIS and BENJAMIN engaged in the following conversation, in substance and part:

LEWIS: I wanna teach u the ropes of it

BENJAMIN: [emojis] let's get this bread while this shit active

LEWIS: Exactly

LEWIS: I wouldn't charge u the whole price , but I'll charge u and teach u the ropes on wat needed

After some back and forth, LEWIS and BENJAMIN agreed on \$800. LEWIS then sent a photograph with handwritten information containing the names, email addresses, and phone numbers for two employees at different New York City hospitals, before continuing as follows:

LEWIS: This is for Brooklyn
I've to walk u thru it
FaceTime ?

BENJAMIN: Ok

LEWIS: [Nyc.gov/covid19hotel](https://nyc.gov/covid19hotel)

BENJAMIN then sent LEWIS a photograph of a portion of the online hotel reservation portal for healthcare workers, before LEWIS continued as follows:

LEWIS: Always start the employee ID with 1237 for
Brooklyn locations
License # always start with 1001

BENJAMIN then sent LEWIS photographs of a fillable online form, entitled "Healthcare Worker New Reservation." BENJAMIN appears to have filled out the "employer ID number" in the manner that LEWIS advised, as the number begins with "1237". Later during this conversation, LEWIS shared contact information for three healthcare workers at New York area hospitals, such as the names, email addresses, and phone numbers for three social workers who worked at hospitals in Manhattan, Westchester, and Queens.

d. On or about June 21, 2020, the conversation continued, and BENJAMIN appeared to indicate that she would be splitting proceeds 50-50 with LEWIS, at least for hotel stays of

a certain length: "Ima only do a month for those fire locations for \$400 every person we go \$200 \$200 . . ."

e. On or about June 22, 2020, LEWIS wrote to BENJAMIN, in substance and in part, the following:

I'm at work right now
We have a new update
They caught on
Don't do no bookings yet

* * *

I'm at work
And a update is today and tomorrow oem isn't taking no reservations
Because people been scamming the center
So they are blocking every thing done today and tomorrow

20. In July 2020, the LEWIS Facebook Account sent the BENJAMIN Facebook Account a screenshot of an apparent "landing page," which gave the user the opportunity to access any of the listed Google email accounts, or to "Sign into another account," or to "Sign out of all accounts". This particular landing page listed ten different Google email accounts, including (1) LEWIS Email Account-1, and (2) an email address that began with "dr." (the "Fraudulent Doctor Email Address"). Based on my review of Google records, I know that the Fraudulent Doctor Email Address was created on or about June 28, 2020; was linked to LEWIS's cellphone number; and was associated with the 161 IP Address (which as described above, is associated with LEWIS). Based on my review of hotel reservation records, I know that the Fraudulent Doctor Email Address was used in connection with obtaining a Program hotel reservation from on or about June 28, 2020 (*i.e.*, the same day the Fraudulent Doctor Email Address was created) until on or about July 7, 2020. The IP address associated with the reservation is the 161 IP Address. Accordingly, I believe that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, was involved in the creation of fake email addresses in furtherance of this fraud scheme.

21. Based on my review of certain private Facebook messages from the LEWIS Facebook Account, I am also aware that, in or around early July 2020, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, supplied seemingly fabricated documents -- *i.e.*, a "job letter" and "pay stub" -- to an apparent hotel customer of hers. The "job letter" asserted that a particular individual was employed as a Registered Nurse at a particular hospital in New York, New York.

The "job letter" also included the hospital's logo and claimed to be written by a Human Resources Administrator.

22. Based on my review of publicly available posts on the LEWIS Facebook Account, I have learned that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, claimed to have made various lavish purchases during (or in the months immediately after) this fraud scheme, including trips to Las Vegas and Atlantic City; a BMW 750 series car; designer shoes; a spa visit; and several elective procedures, including dental work and plastic surgery.

Financial Records

23. Based on my analysis of Cash App records, I believe that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, used (at least) the following three Cash App accounts in furtherance of the scheme ("LEWIS Cash App Account-1," "LEWIS Cash App Account-2," and "LEWIS Cash App Account-3," collectively the "LEWIS Cash App Accounts"):

a. LEWIS Cash App Account-1 and LEWIS Cash App Account-2: Account records for both of these accounts indicate that they are registered in LEWIS' name ("Chanette Lewis"), contain identifiers consistent with Call Center-1 employment records, and were accessed from the 161 IP Address (which as described above, is associated with LEWIS). In addition, the accounts are respectively identified with names "nettyhott" and "nettyhot" that closely resemble LEWIS' Facebook vanity name, "Netty Hott."

b. LEWIS Cash App Account-3: Account records indicate that this account is registered in the name of LEWIS' husband. The investigation has revealed that LEWIS openly used some of her husband's accounts in furtherance of the scheme, including: (1) his Facebook account (where wall-posts regarding Program hotels sometimes said, "via Netty," which I believe connotes that "Netty Hott" was in fact posting this information); and (2) his Cash App account (*i.e.*, LEWIS Cash App Account-3) to a limited extent -- in particular, where the "memo" portion of certain transactions specified that they were for "Netty".

24. Based on my analysis of Cash App records for the LEWIS Cash App Accounts, as well as records for a PayPal account registered to LEWIS Email Account-1, I know that, during the period from April to July 2020, other individuals paid "Lewis" or "Netty" for at least approximately 1,936 nights' worth of hotel rooms. A number of these payments include notations in the memo section such as: "room", "hotel", "telly", "1 month telly", "Bronx Room Peter []", "Hotel Manhattan 2 week extension for Kenny []", "bed",

"alpha hotel", "1 month booking", "for the 2 week room", "for 3 nights", "hotel room", "telly for the month", "Josh - 7days", "2 week stay in Manhattan", "Josh 5 days", "3 week extension please [heart emoji]", and "ayo telly". The prices associated with these payments are generally consistent with the approximate prices that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, discussed on Facebook for Program hotel rooms.

TATIANA BENJAMIN

BENJAMIN's Fraudulent Sales of Program Hotel Rooms to Others

25. I respectfully submit that there is probable cause to believe that the BENJAMIN Facebook Account, with a vanity name of "Ta Banks," was used by TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," the defendant. Based on my review of Facebook account information, I believe that TATIANA BENJAMIN used the BENJAMIN Facebook account for several reasons, including, among others, the following:

a. The BENJAMIN Facebook Account was accessed from a particular IP address ending in -104 (the "104 IP Address"). The 104 IP Address is also associated with three Google email accounts that I believe are used by BENJAMIN (the "BENJAMIN Google Accounts"); for two of these three email accounts, according to subscriber information obtained from Google, the subscriber name is "Tatiana Benjamin," and for the third, the subscriber name is "Ta Banks," the vanity name for the BENJAMIN Facebook Account.

b. The BENJAMIN Facebook Account is associated with a particular cellphone number (the "4890 Phone Number"). The 4890 Phone Number is also tied to: (1) a UI benefits application submitted by BENJAMIN; and (2) the subscriber information for the BENJAMIN Google Accounts.

c. Based on my review of the BENJAMIN Facebook Account, I know that the account has sent private messages including, among other things: (1) a photograph of a shipping label, in which the sender of the package is "Tatiana Benjamin" at an address in Astoria, New York; (2) a purported employment verification letter addressed to "Tatiana Benjamin" in Astoria, New York; and (3) messages in which the sender states that her first name is "Tatiana," and her last name is "Benjamin".

26. As noted above, see *supra* ¶ 19 (which is incorporated herein by reference), CHANETTE LEWIS, a/k/a "Netty Hott," and TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," the

defendants, communicated with each other in furtherance of the scheme using their respective Facebook accounts. In short, during these conversations, LEWIS explained to BENJAMIN that certain "codes" were required to make hotel reservations; admitted that she was selling these codes to others; and sold BENJAMIN, for at least \$800, (1) personal identifying information of at least five healthcare professionals, and (2) the "codes" themselves (e.g., "Always start the employee ID with 1237 for Brooklyn locations / License # always start with 1001"). In addition, LEWIS and BENJAMIN appeared to agree to split profits, at least as to the fraudulent sale of certain hotel reservations.

27. In addition, based on my review of the contents of the BENJAMIN Facebook Account, I know that TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," the defendant, also engaged in extensive communications with potential customers of the fraud scheme and/or other co-conspirators not named herein about the sale of fraudulently obtained Program hotel rooms, including, among other examples, the following:

Facebook Messages between BENJAMIN and FB-User-1

BENJAMIN: Yea my friend works in 311 she pulling strings
rn

FB-User-1: So she's doing them ?

BENJAMIN: Yes. U need a code now to get approve

* * *

BENJAMIN: she's gonna send u the application and then u
tell her ur info send her ur payment
She approves u

* * *

BENJAMIN: cash app LyricMuvaa (\$5) ima send u her
Facebook u send her \$60 for ur 3 days and u got ya hotel

FB-User-1: Why do you charge for her fb ?

BENJAMIN: Ppl charge for vendors, she's my vendor

Facebook Messages between BENJAMIN and FB-User-2

BENJAMIN: ok my friend work for 311 I'm just the middle man once u fill the application she will approve it but u gotta send her the payment.

* * *

FB-User-2: Tell her send me it

* * *

BENJAMIN: Netty Hott

FB-User-2: li

BENJAMIN: My bad but she got so many people writing her u gotta hit her up and tell her Ta Banks sent u.

Facebook Message Between BENJAMIN and FB-User-3

BENJAMIN: Lol anything is possible wen u know a 311 operator 😊

Facebook Message Between BENJAMIN and FB-User-4

BENJAMIN: Friend at 311 gave me the juice for the hotel so I been booking ppl rooms

Facebook Messages Involving LEWIS/FB-User-5, and then BENJAMIN/FB-User-6

In late June 2020 and early July 2020, a Facebook user ("FB-User-5") sent messages to the LEWIS Facebook Account, requesting that LEWIS book hotel rooms for two people. Specifically, he requested a hotel room for the 3rd-6th for one person ("Customer-1"), and for the 4th-7th for the other ("Customer-2"), and added, "If not same hotel then same area if possible." LEWIS sent this information (e.g., the Customers' names and the dates of their requests) to BENJAMIN over Facebook. Promptly after receiving this information, BENJAMIN then wrote to a different Facebook user ("FB-User-6"):

BENJAMIN: Bro make the people's emails for me It's gon be In the emails

Then ima send the link

* * *

[Customer-1's name] (3rd - 6th) [Customer-2's name] (4th
-7th)

Make two emails with those names

Based on my training, experience, and involvement in this investigation, I believe that in these Facebook messages, BENJAMIN admitted that she was exploiting the Program, which she knew was for essential workers; confirmed that she was working with CHANETTE LEWIS, a/k/a "Netty Hott," the defendant ("*Netty Hott*"); and requested that a co-conspirator create email addresses in furtherance of the scheme ("*Bro make the people's emails for me*").

28. In or around early July 2020, a number of individuals sent Facebook messages to the BENJAMIN Facebook Account in which they attached screenshots of a form email from OEM -- entitled "Regarding Your Hotel Request" -- which informed the recipient that they were "not eligible for this program." TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muva," the defendant, told at least some of her customers, in substance and in part, to "disregard the letter," because "I don't think they really gonna kick ppl out." Around the same time, BENJAMIN received Facebook messages from an apparent customer stating, "Boys pulls up to my shit said it was fraud . . . They said 'the city called & said it was paid for fraudulently.'" Around this time, BENJAMIN wrote to CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, at the LEWIS Facebook Account, that "We goin to jail lmao." Then, BENJAMIN and LEWIS agreed to: (1) induce additional individuals to pay for hotel rooms even though the Program appeared to be "over"; and (2) conceal this misconduct by claiming, falsely, that they had been "hacked," as set forth in the following exchange between the BENJAMIN Facebook Account and the LEWIS Facebook Account:

LEWIS: Smh yea it over

LEWIS: The vendor stop paying

BENJAMIN: no but tell they asses to wait simple !! Let's only do 3 days for \$100 faster money
Do 20 people a day that's 2 bands til they stop this shit

* * *

BENJAMIN: But let's Zoe all these people today and tmm delete the connection page Shit

BENJAMIN: And then say people hacked my page lmaoo

LEWIS: That what we going to do

* * *

BENJAMIN: I already zoed people for at least 1,200

* * *

BENJAMIN: That why I said we need to change our pics n shit

* * *

BENJAMIN: I posted my in the connection page just now with the fake page

Cash App Records

29. Based on my analysis of Cash App records, I believe that TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," the defendant, used at least three Cash App accounts in connection with this fraud scheme ("BENJAMIN Cash App Account-1," "BENJAMIN Cash App Account-2," and "BENJAMIN Cash App Account-3," collectively the "BENJAMIN Cash App Accounts"):

a. I have reviewed BENJAMIN's UI application, which lists a date of birth (the "BENJAMIN Birthdate"), a Social Security Number (the "BENJAMIN SSN"), and a residential address in Astoria, New York (the "BENJAMIN Address").

b. BENJAMIN Cash App Account-1 and BENJAMIN Cash App Account-2: These accounts are subscribed in BENJAMIN's name ("Tatiana Benjamin"), with matching identifiers, including the BENJAMIN Birthdate, the last four digits of the BENJAMIN SSN, and the address of the building for the BENJAMIN Address. In addition, as noted above, in a Facebook message, BENJAMIN directly told someone to "cash app LyricMuvaa," which is the account name associated with BENJAMIN Cash App Account-1. The account name of BENJAMIN Cash App Account-2 is substantially similar, with only one different letter: LyricMuvaaa. These two Cash App accounts are also associated with a common bank account (the "BENJAMIN Bank Account").

c. BENJAMIN Cash App Account-3: The third Cash App account used by BENJAMIN is also associated with the BENJAMIN Bank Account. In Facebook messages in or around June and July 2020, BENJAMIN told multiple people to send payment to this third Cash App account, and explained in some instances that the account belonged to the father of her child (e.g., "Okay cash app \$Dreskii600 now send ya name and number and borough"; "Send it to \$Dreskii600"; "\$Dreski600 send it to my daughters dad"; "Send it to \$dreskii600 if u can't find me . . . That's my daughter father shit").

30. Based on my analysis of these three Cash App accounts, I know that, for the period from May to July 2020, other individuals paid TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," the defendant, for at least approximately 398 nights' worth of Program hotel rooms. A number of these payments include notations in the memo section such as: "hotel", "Telly", "the room", "hotel 🇺🇸", "hotel Tyrone", "Brooklyn hotel", "room for 1 week. Alexis .", "1 week.", "Room", "for hotel for week", and "hotel for july 4-6". The prices associated with these payments are generally consistent with the approximate prices that BENJAMIN discussed on Facebook for Program hotel rooms.

31. Based on my analysis of Cash App records, I know that on or about June 20, 2020, BENJAMIN Cash App Account-1 paid LEWIS Cash App Account-2 approximately \$800 for "teaching lessons [emojis omitted]," according to the notation in the memo section. This \$800 payment corresponds to the date of LEWIS and BENJAMIN's Facebook conversation quoted above (see *supra* ¶ 19), in which LEWIS supplied inside information to BENJAMIN (e.g., "Always start the employee ID with 1237 for Brooklyn locations") and said she would "teach" BENJAMIN "the ropes," in exchange for \$800.

BENJAMIN's Fraudulent Personal Use of Program Hotel Rooms

32. Based on my analysis of hotel booking records, I have learned, among other things, that at least approximately 14 nights' worth of hotel rooms were booked in the name of "Tatiana Benjamin" using the Program. The individual using these rooms claimed to be a respiratory therapist, but as set forth below, I believe this claim was false. There is a Google email account associated with this booking; the subscriber of that email account is "Tatiana Benjamin," and the phone number associated with the account is the 4890 Phone Number. Accordingly, I believe that the "Tatiana Benjamin" whose name is associated with 14 nights' worth of hotel rooms is the same person as the defendant, TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa."

33. Based on my review of Facebook records, I know that (1) the user of the BENJAMIN Facebook Account listed her employment as a "bottle girl," which entails serving bottles of alcohol to tables; and (2) in Facebook messages, BENJAMIN explained her employment situation to LEWIS as follows: "Ima supervisor at red mango and I work for my gma but my aunt be doing the work for me and clocking me in so I really just be a red mango." Based on my review of public information, I know that Red Mango is a store that sells frozen yogurt and smoothies. Accordingly, I believe that defendant TATIANA BENJAMIN's, a/k/a "Ta Banks," a/k/a "Lyric Muvaa, claim of being a respiratory therapist was false.

TATIANA DANIEL

DANIEL's Fraudulent Personal Use of Program Hotel Rooms

34. Based on my analysis of hotel booking records, I have learned, among other things, the following:

a. At least six nights' worth of hotel rooms were booked in the name of "Tatiana Daniel" using the Program. The individual using these rooms claimed to be a respiratory therapist, but as set forth below, I believe this claim was false.

b. The subscriber for the Google email account associated with this booking is "Tati Daniel," and the phone number associated with this email account is subscribed in the name of CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, and is associated with various accounts belonging to LEWIS.

Based on this information, as well as the information below, I believe that "Tatiana Daniel", whose name is associated with six nights' worth of hotel rooms is the same person as TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant.

35. The records I have reviewed do not support the claim that TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant, was a healthcare worker. Based on my review of a UI application submitted by DANIEL in June 2020, with a particular date of birth (the "DANIEL Birthdate") and Social Security Number (the "DANIEL SSN") that are linked to DANIEL through financial accounts and a U.S. Passport application, I am aware that DANIEL represented that her Education Level was "Grade 12," and her last employment was as a "Sales agent" at a "European wax center" in Brooklyn, New York.

DANIEL's Fraudulent Sales of Program Hotel Rooms to Others

36. As set forth herein, based on a combination of hotel booking records, Facebook posts and messages, financial records, and email records, I believe that TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant, fraudulently sold at least approximately 144 nights' worth of Program hotel rooms to others.

Email Records

37. I believe that a particular Google email account ("DANIEL Email Account-1"), registered to "Tatiana Daniel," was used by TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant. Among other things, DANIEL Email Account-1 is associated with at least four financial accounts that belong to "Tatiana Daniel". These four financial accounts either contain the DANIEL Birthdate, the DANIEL SSN, the last four digits of the DANIEL SSN, or a combination of these identifiers. The subscriber information for at least one of these four financial accounts also includes a particular New York State Driver's License Number ("NYS DL"); based on my review of a government database, which contains information from the New York State Department of Motor Vehicles, I know that this NYSDL Number is associated with DANIEL, listing the DANIEL Birthdate. Thus, I believe that DANIEL used DANIEL Email Account-1.

Facebook Records

38. I believe that a particular Facebook account, with the vanity name of "Kimora Daniel," was used by TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant (the "DANIEL Facebook Account"). Based on my review of Facebook records, I believe that DANIEL used the DANIEL Facebook Account for several reasons, including the following:

a. The DANIEL Facebook Account sent a private message confirming her identity: Another Facebook user asked, "Tatiana Daniel? Just making sure", and the user replied, "Yes that's me."

b. The DANIEL Facebook Account is associated with both DANIEL Email Account-1 and the DANIEL Birthdate.

c. The DANIEL Facebook Account notes her employment as a sales agent at a European Wax Center, which is what DANIEL represented as her most recent employment in her UI benefits application in June 2020.

d. The DANIEL Facebook Account is associated with a particular IP address ending in -45 (the "45 IP Address"). The 45 IP Address is also associated with at least two financial accounts that: (1) belong to a subscriber named "Tatiana Daniel"; (2) contain the DANIEL Birthdate; and (3) contain the last four digits of the DANIEL SSN.

39. Based on my review of the contents of the DANIEL Facebook Account, which were obtained pursuant to a search warrant, I know that in the approximate period from June to July 2020, this account (among other things) advertised the sale of fraudulently obtained hotel rooms; communicated with potential purchasers of hotel rooms; mentioned that TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant, was working with CHANETTE LEWIS, a/k/a "Netty Hott," the defendant; and acknowledged that the Program was intended for healthcare workers. Specifically, during this period, DANIEL's Facebook wall posts and private messages included the following:

a. After DANIEL received a private message from another Facebook user asking in substance what she was doing, DANIEL replied, "Selling these Telly's".

b. "I have another business...I'm working with netty".

c. After DANIEL received a private message from another Facebook user stating, "Hi I'm looking for a hotel somewhere around downtown Brooklyn for Father's Day," DANIEL replied, "Good morning , yes I have hotels. 3 night minimum 45\$ a night , breakfast included if you want the full 14 days it will be 325 and it can also be extended right now I currently have the Hilton and Hamilton downtown Brooklyn...All hotels I have right now you can check in starting today".

d. In a private message to another Facebook user, DANIEL wrote, "40\$ a night 150\$ a week 250\$ 2 weeks 300\$ entire month (ONLY TODAY) ! 3 night minimum Please provide your First & Last Name Email Number Also when checking in you need a credit card or debit card to put on file as you would for any other hotel for security damages or theft ." The recipient of this message then replied, "Saydatttt does it matter where ?" and DANIEL responded, "Yes NYC love".

e. "Today I will be doing hotels from 2pm - 9pm If you would like to book a hotel please comment below 300\$ 1 month 250\$ 20 days 150\$ 10 days 100\$ 3 days MUST BE CASH APP READY !".

f. "I cannot pick a specific hotel for you because the system generates it and picks the hotel I can only place you in the borough you wanna be in".

40. Based on my training, experience, and involvement in this investigation, I believe that in these Facebook posts and messages, TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant:

a. Advertised the sale of Program hotel rooms (e.g., "Good morning , anyone needs a HOTEL? Today I will be doing hotels from 2pm-9pm If you would like to book a hotel please comment below 300\$ 1 month 250\$ 20 days 150\$ 10 days MUST BE CASH APP READY ! NO REFUND POLICY only !!...").

b. Communicated directly with potential purchasers of hotel rooms (e.g., in response to an inquiry about hotel availability, DANIEL replied, "Good morning, yes I have hotels. 3 night minimum 45\$ a night, breakfast included if you want the full 14 days it will be 325 and it can also be extended right now I currently have the Hilton and Hamilton downtown Brooklyn...all hotels you can check in starting today").

c. Confirmed that she was working with CHANETTE LEWIS, a/k/a "Netty Hott," the defendant (e.g., "I have another business...I'm working with netty").

d. Explained some of the inner workings of the scheme (e.g., "I cannot pick a specific hotel for you because the system generates it and picks the hotel I can only place you in the borough you wanna be in").

41. In addition, based on my review of the DANIEL Facebook account, I know that CHANETTE LEWIS, a/k/a "Netty Hott," and TATIANA DANIEL, a/k/a "Kimora Daniel," the defendants, exchanged various Facebook messages in furtherance of the scheme using the LEWIS Facebook Account and the DANIEL Facebook Account. For example, on or about June 11, 2020, LEWIS sought DANIEL's advice as to pricing, asking, "What u think I should put the price of ? Because I'm doing them 2 weeks straight breakfast included." On or about June 18, 2020, LEWIS sent DANIEL a screenshot of a Facebook post in which LEWIS requested "a worker to help me out Today & Tomorrow" in exchange for \$300 -- "someone loyal a quick learner". LEWIS told DANIEL that she had "97 request", and DANIEL replied, "BITCH LET ME HELP YOU". And on or about June 28, 2020, DANIEL and LEWIS had the following exchange:

DANIEL: We gotta relocate that bitch they keep asking for employee ID
Wanna teach me now after the relocation?

LEWIS: I'll teach u in the AM

DANIEL: Alright I gotttt maddd ppl

42. Based on my review of the DANIEL Facebook Account, I know that TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant, exchanged Facebook messages in furtherance of the scheme in June and July 2020 with a Facebook account with vanity name "Heaven West" (the "WEST Facebook Account"), which as explained below, has been identified through the investigation as being used by HEAVEN WEST, the defendant. Those messages included the following:

DANIEL: Sis you still got hotel RL
If so how long how many days

* * *

WEST: I'm only doing 1 week & 2 week hotel
And a week is 2 bills 2 weeks 3 bills 1 month is
450

DANIEL: How long you got rl for?

Accordingly, I believe that TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, worked together in connection with this fraud on the Program.

Cash App Records

43. Based on my analysis of Cash App records, I believe that at least sixteen Cash App accounts were used in general by TATIANA DANIEL, a/k/a "Kimora Daniel," the defendant, and at least three of them are directly relevant to this fraud. For each of these three Cash App accounts (the "DANIEL Cash App Accounts"): (1) the account name is "Tatiana Daniel"; (2) the date of birth is the DANIEL Birthdate; and (3) the accounts reference the last four digits of the DANIEL SSN. Two of these three accounts also are connected to the 45 IP Address and one uses DANIEL Email Account-1.

44. Based on my analysis of Cash App account records for the DANIEL Cash App Accounts, I know that, for the period from May to July 2020, other individuals paid "Tatiana Daniel" for at least approximately 144 nights' worth of Program hotel rooms. A number

of these payments to "Daniel" include notations in the memo section such as: "hotel", "telly", "10 days", "telly for a month", and "Ryah for three day hotel". The prices associated with these payments are generally consistent with the approximate prices that DANIEL discussed on Facebook for Program hotel rooms.

45. Based on my analysis of Cash App Account records, I know that, for the period from May to July 2020, CHANETTE LEWIS, a/k/a "Netty Hott," and TATIANA DANIEL, a/k/a "Kimora Daniel," the defendants, had at least eight transactions between them.

HEAVEN WEST

WEST's Fraudulent Personal Use of Program Hotel Rooms

46. Based on my analysis of hotel booking records, I have learned, among other things, the following:

a. At least approximately 12 nights' worth of hotel rooms were booked in the name of "Heaven West" using the Program. The individual using these rooms claimed to be a custodian at NYC Health and Hospitals, and a food service worker at two New York City area hospitals. As set forth in detail below, I believe that these claims of working at these hospitals were false.

b. The email accounts associated with these bookings include, among others, a particular Google email account ("WEST Email Account-1").

i. Based on my review of Google records for WEST Email Account-1, I know that the subscriber name is "Heaven West," and the recovery email account is another Google email account ("WEST Email Account-2").

ii. Based on my review of Google records for WEST Email Account-2, I know that the subscriber name is "Heaven West".

c. Based on my review of Facebook subscriber information, I know that the WEST Facebook Account is linked to both WEST Email Accounts-1 and -2, and contains a particular birthdate (the "WEST Birthdate").

d. Based on my review of financial accounts, I know that at least three financial accounts are associated with the name "Heaven West" and WEST Email Account-2; two of these three accounts include a birthdate, which is the WEST Birthdate.

Accordingly, I believe that "Heaven West" whose name is associated with (at least) 12 nights' worth of hotel rooms is the same person as HEAVEN WEST, the defendant. Indeed, the WEST Facebook Account shared a screenshot of a "Confirmation Email" from New York City Emergency Management, confirming that "Heaven West" was booked for 14 nights at a hotel in New York, New York.

47. I believe that HEAVEN WEST, the defendant, was not, in fact, a healthcare worker or hospital employee. Among other things:

a. I reviewed a UI application submitted in April 2020 under the name "Heaven A. West" -- whom I believe to be WEST, based on the name, the WEST Birthdate, the Social Security Number, phone number, and the residential address. On this UI application, WEST represented that her last employment was as an "Usher" at a document management company in New York.

b. Based on my review of records from the U.S. Small Business Administration, I am aware that in or around July 2020, an individual named "Heaven West" -- associated with both the WEST Birthdate and WEST Email Account-2 -- filed an application for a loan (through the COVID-19 Economic Injury Disaster Loan program); in this loan application, WEST represented that she was the owner of a sole proprietorship, specifically a "Hair & Nail Salon."

WEST's Fraudulent Sales of Program Hotel Rooms to Others

48. As set forth herein, based on a combination of hotel booking records, Facebook posts and messages, and financial records, I believe that HEAVEN WEST, the defendant, fraudulently sold at least approximately 179 nights' worth of Program hotel rooms to others.

Facebook Records

49. I believe that HEAVEN WEST, the defendant, used the WEST Facebook Account (with vanity name "Heaven West"). Based on my review of Facebook records, I believe that WEST used the WEST Facebook Account for several reasons, including the following:

a. The WEST Facebook Account is associated with WEST Email Account-1.

b. The WEST Facebook Account lists the WEST Birthdate.

c. The WEST Facebook Account sent various private messages confirming identity, including one containing a

photograph of her apparent New York State Identification Card, which includes the WEST Birthdate and the name, "Heaven Anu West." In other messages, she supplied her name ("Heaven West") and her birthday (the WEST Birthdate).

d. The WEST Facebook Account is linked to a financial account that, in turn, is associated with WEST Email Account-2.

50. Based on my review of the contents of the WEST Facebook Account, which were obtained pursuant to a search warrant, I know that in the period from April to July 2020, this account (among other things) advertised the sale of fraudulently obtained hotel rooms; communicated with potential purchasers of hotel rooms; and noted her awareness that the Program was intended for healthcare workers. Between April and July 2020, HEAVEN WEST, the defendant, made wall posts and sent private messages that included the following, all of which are in substance and/or in part:

- WEST received a private message from another Facebook user ("FB-User-7") stating, "I could try to get you a free room / Send me your first and last name if they approve the application you could check in the hotel / Have a lil party in there," and WEST replied, "How?" FB-User-7 responded, "The essential workers application," to which WEST replied, "Oh ok".
- After WEST received a private message from another Facebook user ("FB-User-8") stating, "You know how to do the application right," WEST replied, "Yea". FB-User-8 continued, "Make a fake email to send your Confirmations too." WEST replied, "I got them already I'm Gucci." FB-User-8 responded, "so just do that and tax n[*****] for confirmations Newyorkpresibytarian emails end like Nyp.org," and WEST replied, "Ik / Bro I got ittttttttt / LMFAOOOOO I'm all set" and added, "I got 3 people Telly's today."
- "Who need a hotel / ask me questions about hotels...."
- WEST received a message from another Facebook user asking how many "Telly's" WEST "could get," and WEST replied, "Any amount / I just need full names / And the amount of days."

- "OK YALL I LIED I GOT 2 HOTELS IN THE BRONX AND 2 IN MANHATTAN FOR SALE. yall know the drill - be CASH APP OR ZELLE ready !!!!!"
- "ANYONE NEED A HOTEL?
1 week is 2 bills
2 weeks 3 bills
1 month is 450
IF INTERESTED INBOX ME & COMMENT I INBOXED YOU"
- "Please do not ask me to hold a hotel room for you, because if someone is CASH APP AND APPLE PAY READY I'm selling it !"
- When one potential customer objected to WEST's price-per-night (\$50) as too high, WEST replied that this room "go for 135/night / I'm giving you a major deal / You can go to kimora for Telly's tho besides me"
- "When inboxing me for Telly's please send: -desired check in date -full name -budget -how many days you want y'all been great 🙌"
- "I have no locations in queens
I can give you the Manhattan Telly for cheaper lmk"
- WEST wrote to an apparent hotel customer, "since I used ya name / You got a friend that check into for you ? . . . Because i think they going to dub your name since I used it already." The customer replied, "Okay bet so use [a different name, which he supplied]."
- An apparent hotel customer wrote private messages to WEST stating, "The security be bitchin ? / Cause imma have a few people". WEST replied, "Nah . . . No more than 5-7 people." Later, WEST added, "Make sure you don't go all up at once."
- After WEST received a private message from another Facebook user ("FB-User-9") stating, "good morning you got rooms sis?", WEST replied, "Nah I dead don't bro / All essential hotels are clipped" and added: "They finding out we was scamming the system lol."

51. Based on my review of the contents of the WEST Facebook Account, I know that, during the period of the fraud scheme, one customer ("FB-User-10") complained to WEST in a string of messages, writing in substance and in part that:

I'm the one getting played rn bc I gave you 200\$ for a telly and still don't have a telly . . . and now ur not tryna give my bread back for a room that u didn't even pay for bc the hote said the government Pays for the room . . . You messed up the dates the first time which is why I was unable to check in and I told you why I couldn't check in and now your trying to tell me I receive my goods and services when I did not bc I'm not staying in that hotel it got canceled bc nobody said anything about the names having to match up and bc they were being strict about the program.

WEST replied over Facebook, via voice messages, that she would not issue a refund, and explained, in part: "I do this every single day, you the only person I'm having problems with." WEST added, in part, "When you went to the hotel the second time with the second confirmation, I asked you to give me a different name." However, WEST did offer a replacement hotel room to FB-User-10, noting in part, "I could make a whole 'nother reservation . . . I'll get the confirmation within two hours. I won't put it in your name." During these voice messages, WEST explained the process, stating in part: "This is a essential - essential worker compensation thing for the hotels. Like, everybody - anybody can literally get it. Like, it's a free hotel. But like nobody knows how to get it . . . That's what I'm selling you. . . I get them for free and I sell them for the low. 'Cuz if you buy it on your own, it's gonna be triple, double . . . what I'm giving y'all."

52. Based on my training, experience, and involvement in this investigation, I believe that in these wall posts and private messages, HEAVEN WEST, the defendant:

a. Advertised the sale of Program hotel rooms (e.g., "ANYONE NEED A HOTEL? 1 week is 2 bills 2 weeks 3 bills 1 month is 450 IF INTERESTED INBOX ME & COMMENT I INBOXED YOU").

b. Was informed by one person, and then told another, that Program hotels were for essential workers (e.g., FB-User-7 told WEST that the hotel rooms were available through "The essential workers application").

- c. Was told that "the government Pays for the room."
- d. Stated that the hotel rooms were "free."
- e. Admitted that the hotel scheme was a scam (e.g., "All essential hotels are clipped . . . They finding out we was scamming the system lol").
- f. Admitted putting hotel reservations in the name of someone whom she knew was not in fact the intended user of the room (e.g., "since I used ya name / You got a friend that check into for you ? Because i think they going to dub your name since I used it already."; "I won't put it in your name.")

53. In addition, in a series of private "voice messages" on Facebook, HEAVEN WEST, the defendant, explained the process to various customers or potential customers, including, among other things, instructing one individual to return the hotel room key to WEST herself, not to the hotel, because WEST had reserved the room for two weeks and was selling portions (e.g., in 2-3 day blocks) to others.

Cash App Records

54. Based on my analysis of Cash App records, I believe that at least one Cash App account was used by HEAVEN WEST, the defendant (the "WEST Cash App Account"). The account name for the WEST Cash App Account is "Heaven West"; the date of birth associated with the account is the WEST Birthdate; the account is tied to WEST Email Account-2; and the account is linked to a cellphone number that is also linked to the WEST Facebook Account.

55. Based on my analysis of Cash App records for the WEST Cash App Account, I know that, during the period from approximately May to July 2020, others paid HEAVEN WEST, the defendant, for at least about 179 nights' worth of Program hotel rooms. Certain payments to WEST include a notation in the memo section such as "telly". Additionally, the prices associated with these payments are generally consistent with the approximate prices that WEST discussed on Facebook for Program hotel rooms. Some payments from WEST also include notations such as "Telly" or "hotel refund."

* * *

56. Based on my review of Facebook records and Cash App records, my training and experience, and my participation in this investigation, I believe that HEAVEN WEST, the defendant, supplied

direction to at least one co-conspirator ("CC-1") in furtherance of the scheme. Based on various Facebook messages, I believe that WEST had CC-1 assist WEST with various aspects of the scheme, including providing the hotel room key to customers, collecting customer payments, and receiving inquiries from potential customers. For example, on or about June 17, 2020, WEST reserved a Program hotel room for a particular customer and then told the customer to contact "my bff for the room key," whose name and phone number WEST supplied. WEST told this customer to "Call [CC-1's] number right after you send payment so y'all can make a time for you to go over there." On another occasion (on or about July 3, 2020), WEST told a hotel customer that her "friend" would contact the customer "for the 150," and WEST then supplied CC-1's phone number, further indicating that WEST outsourced some aspects of the scheme to CC-1. In addition, on or about June 23, 2020, WEST posted publicly, "Anyone who need a hotel TONIGHT hit up [CC-1] on fb. Any other days HIT ME UP," which I believe connotes that CC-1 was available to receive hotel inquiries on WEST's behalf. Based on my review of Cash App records, during the approximate period from June to July 2020, the HEAVEN WEST Cash App Account sent more than approximately \$1,000 in total, across more than ten transactions, to Cash App Accounts associated with CC-1. Finally, on or about June 23, 2020, HEAVEN WEST posted a Facebook "Status" that, in substance and part, she was "Still taking Telly's"; a co-conspirator ("CC-2") then referred WEST three potential customers; and WEST instructed CC-2, "tell them all to inbox me [CC-2]."

CHANETTE LEWIS'S FRAUD SCHEME INVOLVING UNEMPLOYMENT BENEFITS

57. Based on my involvement in this investigation, including my review of records and my conversations with others, including a Special Agent from the U.S. Department of Labor -- Office of Inspector General ("DOL Agent-1"), I have learned the following, in substance and in part:

a. Unemployment Insurance ("UI") is a state-federal program that provides monetary benefits to eligible lawful workers. UI payments (benefits) are intended to provide temporary financial assistance to lawful workers who are unemployed through no fault of their own. In the State of New York, the state's Department of Labor (the "NY DOL") administers the UI program.

b. On or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security ("CARES") Act was signed into law. Under the CARES Act, UI eligibility was expanded to provide assistance as a result of the ongoing COVID-19 pandemic. In total, under the CARES Act (and subsequent Acts of Congress), more than

approximately \$800 billion in additional federal funds for UI benefits have been appropriated since in or around March 2020.

c. The NY DOL offers an online website (the "Website") through which applicants can apply for COVID-19 benefits and verify unemployment status. To apply for COVID-19 benefits through the Website, an applicant must complete a form that includes, among other things, the applicant's name, date of birth, social security number, and address. In addition, the applicant can direct that the NY DOL send any approved funds to a specific bank account or to a debit card.

58. Based on my involvement in this investigation, including my review of records and my conversations with DOL Agent-1, I am aware that "Chanette Lewis" has filed two unemployment benefits applications during the COVID-19 pandemic -- one on or about November 25, 2020, and the other on or about March 21, 2021. (The November 25, 2020 application sought not only *prospective* UI benefits, but also *retroactive* UI benefits dating back to March 2020.) Based on the name, date of birth, Social Security Number, email address, residential address, and Driver's License number on these applications, I believe that each was filed by CHANETTE LEWIS, a/k/a "Netty Hott," the defendant. As a result of these applications, I know that LEWIS has received at least approximately \$46,000 in UI benefits for the period from in or around March 2020 to the present. However, as noted above, LEWIS was employed at Call Center-1 for at least some of this period, namely April to mid-June 2020. As a result, for at least several months, LEWIS was both employed and receiving benefits as though she were unemployed. Based on my review of these two unemployment benefits applications, I believe that each contains material misrepresentations, including but not limited to the following:

LEWIS's November 25, 2020 Application

a. In response to a question about the last date she worked, LEWIS represented that the last date she worked was February 28, 2020.

b. In response to a question that asked, "Are you filing this claim because your workplace closed, you were isolated or you were quarantined due to COVID-19, also known as the Coronavirus?", LEWIS answered, "Yes."

c. In response to a question that asked for the applicant's most recent employer, LEWIS represented that she most

recently worked performing "maintenance" at "done right" in Brooklyn, New York.

d. In response to a question that asked why she was no longer working for her most recent employer, LEWIS answered, "Lack of work - COVID."

e. In response to a question that asked, "Was all the money you earned in 2019 and up until today in 2020 from running your own business?", LEWIS answered, "Yes."

f. In response to a question that asked, "Did you lose all of your employment in the 18 months due to lack of work?", LEWIS answered, "Yes."

g. I believe that each of these answers was false. Contrary to LEWIS's representations, the last date that she worked was not in February 2020; her most recent employment was not in "maintenance" for an employer named "done right"; and her employment did not cease due to the COVID-19 pandemic. Rather, as noted above, she worked as a call representative at Call Center-1 from approximately April to June 2020, and her employment ceased because she stopped showing up to work. In addition, at least as to Call Center-1, LEWIS did not run that business.

LEWIS's March 21, 2021 Application

h. In response to a question about the last date worked, LEWIS represented that the last date she worked was May 14, 2020.

i. In response to a question about the reason that her most recent employment ended, LEWIS represented that her most recent employment as a "Call representative" in Brooklyn ended due to "Lack of Work - COVID."

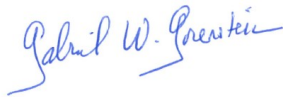
j. I believe that each of these answers was materially false. Contrary to LEWIS's representations, her employment did not cease due to "lack of work" or to the COVID-19 pandemic. Rather, her employment at Call Center-1 existed due to the pandemic, and her employment ceased because she stopped showing up to work.

WHEREFORE, the deponent respectfully requests that warrants be issued for the arrests of CHANETTE LEWIS, a/k/a "Netty Hott," TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, and that they be arrested and imprisoned, or bailed, as the case may be.

/s/ sworn telephonically

JARED EANNUCCI
Special Agent
United States Attorney's Office, SDNY

Sworn to me through the transmission of this Affidavit by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1, this 28th day of September, 2021



THE HONORABLE GABRIEL W. GORENSTEIN
Chief United States Magistrate Judge
Southern District of New York