

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Daniel A Lee, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a U.S. Postal Inspector with the United States Postal Inspection Service (“USPIS”). I have been a U.S. Postal Inspector for approximately eight years, and, as such, am an investigative or law enforcement officer of the United States within the meaning of Rule 41(a) of the Federal Rules of Criminal Procedure. While employed as a law enforcement officer, I have conducted and participated in dozens of investigations related to identity theft; the theft of money and property by fraud or force, including the theft of government property; as well as armed and unarmed assault of government employees.

2. I submit this affidavit in support of a criminal complaint charging Myesha LEWIS (“LEWIS”) and Kenneth DEMOSTHENE (“DEMOSTHENE”) each with two counts of armed robbery of a United States Postal Service (USPS) Letter Carrier on November 29, 2022 and December 16, 2022, in violation of 18 U.S.C. §§ 111(a)(1) and (b), and 2; (Assaulting, resisting, or impeding certain officers or employees; Aiding and abetting) and two counts each of 18 U.S.C. §§ 2114 and 2; (Robbery of any person having lawful charge, control, or custody of any mail matter or of any money or other property of the United States; Aiding and abetting).

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This is an evolving and continuing investigation; this affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter or related matters.

BACKGROUND

4. Postal customers use blue collection boxes to send various types of U.S. Mail. First class mail is the most common type of mail sent by stamp and envelope. Some of the most common items sent in first-class mail by postal customers are checks. These checks are often placed into a U.S. Postal Service (“USPS”) blue collection box on the street or in front of a post office. As a result, criminals routinely target USPS first-class mail placed in blue collection boxes to steal checks.

5. Criminals typically use one of three methods to steal mail containing checks from blue collection boxes. The first method is referred to as “fishing.” Mailbox fishing is an act in which suspects use everyday devices such as mousetraps, water bottles, and soap bottles affixed with string or shoelaces to pull letters out of blue collection boxes. The objective of this “mailbox fishing” is to pull checks and other monetary instruments from the mail. The second method is to use tools to pry open a blue collection box. These “pry attacks” are accomplished with a crowbar, pry bar, or hammer, for example. The third method is to use Arrow keys to open the blue collection box. These Arrow keys are the property of USPS, and it is a federal offense for an unauthorized person to possess one. Where criminals cannot acquire a legitimate Arrow key through theft or other means, they have used counterfeit Arrow keys, which are machined using a legitimate Arrow key.

6. Criminals involved in mail theft from blue collection boxes often operate in organized groups recruited to perform specific functions. Some individuals are recruited to steal the mail, while others are recruited to provide their debit cards and PINs to launder the stolen checks. These recruited account holders are money mules who are often promised money in exchange for the use of their accounts.

7. The people who recruit these money mules into the scheme are referred to as

recruiters. These recruiters engage in recruitment activities through a variety of methods, to include social media. These recruiters will often post images and pictures as advertisements to attract money mules. These images, referred to as “trophy photos,” include images of large sums of US Currency as well as stolen mail and checks, and are used in advertisements seeking people with accounts at specific banks.

8. Some checks stolen from the mail are altered by a process called “check washing.” This check washing process involves using a chemical to wash away the pen ink used to write information on the check without damaging the check or the higher quality ink. Once these checks have been washed, the checks are rewritten to reflect a new amount and paid to the name of the recruited account holder.

9. These stolen checks are then either deposited (“as is” or washed) into money mule accounts using a variety of methods including ATM deposits and mobile deposits or are used to create entirely new counterfeit checks using check stock purchased from office supply stores. These proceeds are then further laundered using digital payment networks such as Zelle or through ATM withdrawals.

Trends In Massachusetts

10. From in or about 2016 to 2021, the U.S. Postal Inspection Service (“USPIS”) experienced an uptick in the number of incidents of mailbox fishing in Massachusetts. In response to this mailbox fishing threat, USPS retrofitted many existing collection boxes with devices to capture fishing devices inserted into the collection box openings and replaced traditional collection boxes with “anti-fishing” collection boxes designed with the anti-fishing devices built in.

11. In 2022 and 2023, USPS continues to harden the collection box inventory in Massachusetts against traditional fishing-related mail theft, making traditional collection box

fishing more difficult. However, in response to these efforts, USPIS is now seeing an increase in the Arrow key-related robberies to facilitate the theft of U.S. Mail. Criminals obtain these Arrow keys in several ways. They steal them from postal workers through actual or threatened violence; they recruit collusive postal employees to lease their Arrow keys; or they purchase them from the Dark Web.

12. Since July 2022, there have been at least 13 assaults on USPS letter carriers while in the performance of their official duties while working in Boston and surrounding cities and towns. These incidents included the attempted or successful robbery of USPS Arrow keys from letter carriers in at least 10 instances. Additionally of these 10, six of the robberies were instances where the perpetrators were reportedly armed with a knife, firearm, or both.

PROBABLE CAUSE

The Mattapan Robbery

13. Based on my investigation, including the review of witness/victim statements and surveillance videos/photos, I am aware that on or about November 29, 2022, at approximately 1400 hours, VICTIM 1, a USPS letter carrier, was delivering U.S. Mail on Hiawatha Rd., part of his delivery route in Mattapan, MA.

14. While exiting a small apartment building, located at 8 Hiawatha Rd. (“ADDRESS-1”), VICTIM 1 first noticed an individual (“UNK-1”) standing on the front porch. He described UNK-1 as a young black male; between the ages of 16 and 24 years old; of a skinny build; approximately 5’8” tall; wearing a black hooded sweatshirt with the hood up, a black facemask, and red sweatpants.¹ As VICTIM 1 exited ADDRESS-1, UNK-1 entered the

¹ Subsequent review of surveillance video by law enforcement revealed that the red sweatpants could aptly be described as red jogger style sweatpants with contrast/white lines on the thigh. In addition, the suspect appeared to be wearing black/dark colored running shoes with a white/contrast Nike logo.

vestibule of the building.

15. After exiting ADDRESS-1, VICTIM 1 continued his delivery route on the even numbered side of Hiawatha Rd. In front of 2 Hiawatha Rd. (“ROBBERY LOCATION-1”) UNK-1 approached VICTIM 1 and said, “Can I ask you a question?” UNK-1 then stated to VICTIM 1, “I’m going to need your master key.”

16. UNK-1 then reached into VICTIM 1’s U.S. Mail satchel, grabbing his Arrow key. VICTIM 1 stated that UNK-1 “yanked pretty hard” on the key, which was secured to VICTIM 1’s clothing per USPS policy with a brass chain. The mechanical force employed by UNK-1 caused the brass chain to break, allowing UNK-1 to flee ROBBERY LOCATION-1 in possession of VICTIM 1’s USPS Arrow key on foot up Mattapan St. In addition to the USPS Arrow key, VICTIM 1’s key ring contained a fob for an apartment complex in the Mattapan neighborhood of Boston, MA, and a third unidentified key.

17. A review of surveillance video from the area shows a gray Toyota Corolla sedan (“VEH-1”)², bearing a Zipcar decal on its rear passenger doors, drive down Hiawatha Rd. to the intersection with Blue Hill Ave, in front of ROBBERY LOCATION-1 at approximately 1402 hours.

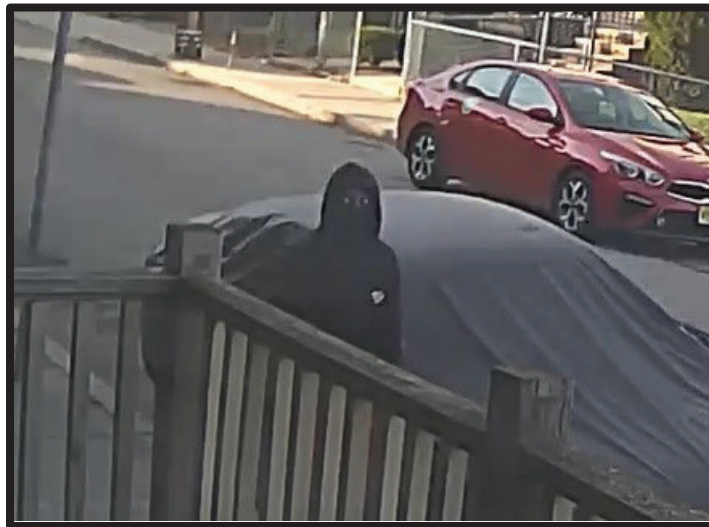
18. VEH-1 reversed into the on-street-parking spot in front of ROBBERY LOCATION-1, before pulling forward, making a left-hand turn onto Blue Hill Ave., and a subsequent left hand turn on to Mattapan St., stopping at the on-street parking spot behind 7

² Zipcar GPS business records place a gray 2022 Toyota Corolla sedan bearing MA registration 3RXV34 at this location on this date and time. The vehicle was rented by Myesha LEWIS (“LEWIS”) from November 28, 2022 - November 30, 2022. LEWIS used a Google email address that includes her first name and a cell phone number referred to herein as “LEWIS’S PHONE” as identifiers for her Zipcar account. Zipcar business records show LEWIS’s account is linked to the Zipcar account of Kenneth DEMOSTHENE (“DEMOSTHENE”). DEMOSTHENE used a Google email address that includes his first and last name and a cell phone number referred to herein as “DEMOSTHENE’S PHONE” as identifiers for his Zipcar account.

Hiawatha Rd. (“ADDRESS-2”). VEH-1 was operated by a second, unidentified individual (“UNK-2”). UNK-1 was seen emerging from the right front passenger door of VEH-1. UNK-1 walked to the rear of VEH-1, opened the trunk, removed a pair of shoes, and exchanged them for the shoes he was wearing. UNK-1 closed the trunk, walked to the front left passenger window, and appeared to speak with UNK-2 through the open driver’s window.

19. UNK-1 was observed walking on Mattapan St. toward Blue Hill Ave. on foot and turning right on to Hiawatha Rd. UNK-1 was observed entering ADDRESS-1, then exiting ADDRESS-1 behind VICTIM 1.

20. At approximately 1405 hours, UNK-1 was observed approaching VICTIM 1 on the front steps of ROBBERY LOCATION-1. Surveillance cameras captured the following image of UNK-1:



21. UNK-1 was observed having a short exchange with VICTIM 1 prior to reaching into VICTIM 1’s U.S. Mail satchel. UNK-1 was observed pulling VICTIM 1’s Arrow key chain with such mechanical force that VICTIM 1 was pulled off the front steps of ROBBERY LOCATION-1. UNK-1 was observed immediately fleeing on foot across Hiawatha Rd. and running up Mattapan St. Surveillance cameras captured the following image of UNK-1:



22. I have reviewed records from Massive Action LLC, which document sales of “Lonely Hearts Club” sweatshirts in base color black with white or rhinestone lettering. The records show that Kenneth DEMOSTHENE was one of approximately five fulfilled orders sent to Massachusetts for the entire production run of the product. DEMOSTHENE utilized the Google email address associated with DEMOSTHENE’s Zipcar account and DEMOSTHENE’S PHONE as identifiers for the order, which was filled on January 3, 2022. The product advertised on the company website, which appears to be the sweatshirt worn by UNK-1 in the surveillance footage from November 29, 2022, is pictured below:



23. UNK-1 was observed³ running up Mattapan St. past VEH-1. Shortly after, at approximately 1406 hours, VEH-1 was observed fleeing up Mattapan St. at a high rate of speed. I have reviewed Zipcar business records, which include GPS data for VEH-1. The records show VEH-1 travelling on Mattapan St. toward Fottler Rd. at approximately 1405 hours, fleeing the area. At approximately 1414 hours VEH-1 arrived in the area of LEWIS' residence on Harvard St. in the Dorchester neighborhood of Boston, MA. VEH-1 remained stationary until the next track indicating motion at approximately 1457 hours. At approximately 1831 hours, Zipcar GPS records track VEH-1 to DEMOSTHENE's residence in Stoughton, MA, where it remained until approximately 1853 hours.

24. A review of call detail records ("CDR") for DEMOSTHENE'S PHONE shows two outgoing calls to LEWIS' PHONE on November 29, 2022, at 12:34:26 and again at 12:34:54 hours.

25. Cell site location information ("CSLI") for LEWIS' PHONE and DEMOSTHENE'S PHONE was reviewed and compared with Zipcar GPS records from VEH-1. A review of the records for the 24-hour period of November 29, 2022 shows LEWIS' PHONE and DEMOSTHENE'S PHONE consistently utilized cell towers that serviced the corresponding GPS location of VEH-1, spanning a broad geographic area from points on the north shore, metro Boston, and south of Boston over the course of the day.

26. Notably, the records show that, from 1300-1630 hours on November 29, 2022, LEWIS' PHONE and DEMOSTHENE'S PHONE utilized cell towers that serviced (in chronological order) ADDRESS-1, where Victim 1 first noticed UNK-1; ADDRESS-2, where UNK-2 dropped off UNK-1 in VEH-1 before the robbery; ROBBERY LOCATION-1; and

³ Observation was made both by VICTIM 1 and by law enforcement reviewing surveillance footage.

LEWIS' residence. The records also show that LEWIS' PHONE and DEMOSTHENE'S PHONE utilized cell towers that serviced DEMOSTHENE's residence after the robbery, including tower hits from LEWIS' PHONE at 18:33:55 hours EST and DEMOSTHENE'S PHONE at 19:33:10 hours EST.

The Hyde Park Robbery⁴

27. On or about December 16, 2022, at approximately 1650 hours, VICTIM 2, a USPS letter carrier, was delivering U.S. Mail on Park St., part of his delivery route in Hyde Park, MA. At the intersection of Park St. and Arlington St. ("ROBBERY LOCATION-2") two unknown individuals, ("UNK-3") and ("UNK-4"), rapidly approached him.

28. He described UNK-3 as a young black male; between the ages of 18 and 22 years of age; of a skinny build; approximately 5'5"- 5'6" tall; wearing a black hooded sweatshirt with a white design on the chest, with the hood up, a black facemask, light blue jeans, and white sneakers.

29. He described UNK-4 as a young black male; between the ages of 18 and 22 years of age; of a skinny build; approximately 5'8"- 5'9" tall; wearing a black hooded sweatshirt, with the hood up, a black facemask, and black pants.

30. According to VICTIM 2, UNK-4 produced a black handled knife with a silver blade approximately 2.5" – 3" long as he approached VICTIM 2 and said, "Give me your fucking Arrow key." VICTIM 2 put his hands in the air and attempted to remove the Arrow key that was secured to his clothing per USPS policy with a brass chain. UNK-3 or UNK-4 pulled on the chain while attempting to cut it with the knife, while UNK-3 yelled at VICTIM 2, "Hurry up."

⁴ Unless specified otherwise, the information in this section comes from reports documenting a law enforcement interview with VICTIM 2

31. After taking the Arrow key from VICTIM 2, UNK-3 and UNK-4 fled up Arlington St. in the direction of River St. The weather conditions present at the time, heavy wind and rain, made VICTIM 2's attempts to call 911 difficult. He took shelter on the porch of 105 Arlington St. while reporting the incident. VICTIM 2 recalled seeing UNK-3 and UNK-4 approximately 45-60 minutes prior to the robbery in the area of 73 Arlington St. He noted that UNK-3 and UNK-4 did not appear wet at that time despite the heavy rain, stating that he believed they must have been in a vehicle or inside a building.

32. A review of surveillance video from the area shows two individuals matching the description of UNK-3 and UNK-4 walking in front of 79 Arlington St. at approximately 1620 hours (approximately 30 minutes before the robbery) in the direction of ROBBERY LOCATION-2. They were observed standing in front of 117 Arlington St. ("ADDRESS-3") at approximately 1659 hours, when the individual matching the description of UNK-4 walked out of frame on Arlington St. toward SUBJECT PREMISES-2. Surveillance cameras captured the following image, in which UNK-4 (*to the right of frame*) appears to be wearing a dark colored sweatshirt with three lines of white writing on the back, consistent with the "Lonely Hearts Club" sweatshirt worn by UNK-1:



33. The individual matching the description of UNK-3 remained in front of ADDRESS-3 until approximately 1700 hours when he walked out of frame on Arlington St. toward ROBBERY LOCATION-2, as depicted in the following surveillance image:



34. At approximately 1705 hours VICTIM 2 walked in front of ADDRESS-3 from the direction of ROBBERY LOCATION-2 while on the phone. Law enforcement learned from VICTIM 2 that he was on the phone at this time attempting to report the incident.

35. I have reviewed Zipcar records, which include GPS data, for a black 2021 Honda CR-V SUV, bearing MA registration 2FZY63 (“VEH-2”). The vehicle was rented by LEWIS from December 16, 2022 – December 17, 2022.

36. The Zipcar GPS records track VEH-2 to DEMOSTHENE’s residence from approximately 1320-1337 hours on December 16, 2022. The records later show VEH-2 circling ROBBERY LOCATION-2 and surrounding blocks from approximately 1610-1708 hours on this date. The records track VEH-2 to the area of 12 Laval St., approximately 413 feet from ROBBERY LOCATION-2, from approximately 1649-1657 hours. At approximately 1708 hours VEH-2 left the area. At approximately 1720 hours VEH-2 arrived at LEWIS’ residence. VEH-2

remained stationary at LEWIS' residence until the next track indicating motion at approximately 1808 hours. At approximately 1905 hours, Zipcar GPS records track VEH-2 to DEMOSTHENE's residence. At approximately 1916 hours, VEH-2 arrived at 265 Washington St., Stoughton, MA, a KFC restaurant ("KFC"). Surveillance cameras captured the following image of VEH-2 at the KFC drive-through:



37. The operator of VEH-2 is consistent with LEWIS' physical description and appearance, which I am familiar with based on my review of Massachusetts Registry of Motor Vehicle records and social media accounts associated with LEWIS, depicted below:



38. Surveillance images show an unidentified passenger in the right-front passenger's seat of VEH-2 wearing a dark colored clothing with lighter contrasting lettering. This clothing appears to be different than the "Lonely Hearts Club" sweatshirt worn by the suspect who I believe to be DEMOSTHENE.

39. Cell site location information ("CSLI") for LEWIS' PHONE and DEMOSTHENE'S PHONE was reviewed and compared with Zipcar GPS records from VEH-2. Zipcar GPS records from VEH-2 in combination with CSLI for LEWIS' PHONE and DEMOSTHENE'S PHONE, for the 24-hour period of over the course of the day on December 16, 2022, show LEWIS' PHONE and DEMOSTHENE'S PHONE consistently utilized cell towers that serviced the corresponding GPS location of VEH-2, spanning a broad geographic area from points south of Boston and metro Boston. Specifically, the records show that from 1530-1930 hours December 16, 2022, LEWIS' PHONE and DEMOSTHENE'S PHONE utilized cell towers that serviced ADDRESS-1; ROBBERY LOCATION-1; ADDRESS-2; and LEWIS' residence. LEWIS' PHONE utilized cell towers that serviced ROBBERY LOCATION-2 and ADDRESS-3. DEMOSTHENE'S PHONE's closest tower hit is nearby ROBBERY LOCATION-2 and ADDRESS-3.

40. Zipcar GPS records from VEH-2 in combination with CSLI for LEWIS' PHONE and DEMOSTHENE'S PHONE, December 16, 2022, show LEWIS' PHONE and DEMOSTHENE'S PHONE utilized cell towers that serviced SUBJECT PREMISES-2 and KFC, including but not limited to tower hits from LEWIS' PHONE at 19:12:51 hours EST and DEMOSTHENE'S PHONE at 18:50:19 hours EST.

The Residential Searches

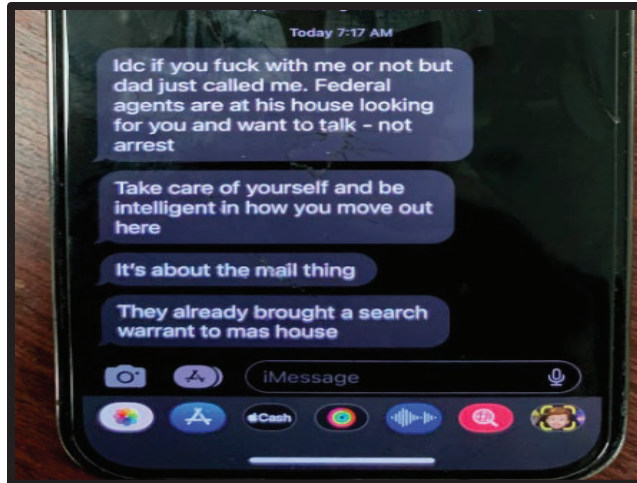
41. Based in part on the foregoing information, I obtained federal warrants to search LEWIS' and DEMOSTHENE's residences and persons. *See* 23-mj-7236-JCB; 23-mj-7237-JCB;

23-mj-7238-JCB; and 23-mj-7239-JCB. On or about Friday, May 5, 2023, agents from USPIS along with other members of law enforcement executed the warrants simultaneously at DEMOSTHENE's residence in Stoughton, MA and at LEWIS' residence in Dorchester, MA.

42. Law enforcement recovered a number of items of note from DEMOSTHENE's home in Stoughton, including a black/dark colored sweatshirt bearing contrast "Lonely Hearts Club" writing on the back and emblem on the front, found in a hamper in the laundry room. This sweatshirt appears to be the same as the one worn by UNK-1 on November 29, 2022 and UNK-4 on December 16, 2022. In addition, law enforcement recovered a pair of Red Adidas jogger style sweatpants with contrast/white lines on the thigh and a pair of black Nike running shoes with white/contrast Nike logo from DEMOSTHENE's bedroom. This items both bear likeness to those worn by UNK-1 on November 29, 2022.

43. When law enforcement arrived, DEMOSTHENE was not home. While some members of law enforcement continued to search at this location, others went to look for DEMOSTHENE. Law enforcement initially searched for DEMOSTHENE at his father's home in Brockton without success. DEMOSTHENE was ultimately located at his girlfriend's home in Wilmington, Massachusetts. DEMOSTHENE declined to speak to law enforcement. Law enforcement seized his phone pursuant to the warrant.

44. During a preliminary review of DEMOSTHENE's cell phone, law enforcement located a text conversation between DEMOSTHENE and a contact identified by law enforcement as DEMOSTHENE's sister. The conversation is time and date stamped, "Today 7:17 AM" and was from the morning of the search warrants. A screen capture of the message is below. The phone remains in law enforcement custody; forensic analysis is ongoing.



45. LEWIS was present at her residence when agents executed the search warrant and was wearing a black colored sweatshirt bearing contrast “Nike” writing and emblem on the front. This sweatshirt appears to be the same as the one worn by UNK-3 during the robbery on December 16, 2022. Law enforcement recovered a number of items of note from LEWIS’ bedroom at her home in Dorchester. These items included a USPS vehicle key on ring with medallion bearing vehicle number: 0231361. USPS records indicate that USPS vehicle 0231361 was temporarily assigned to Hyde Park and returned to the USPS Vehicle Maintenance Facility to have its locks replaced on December 17, 2022, the day following the Hyde Park Robbery during which Victim 2’s keyring was stolen. In addition, law enforcement recovered a silver folding pocketknife, Vipertek stun gun, mail in the name of DEMOSTHENE.

46. LEWIS was advised of her *Miranda* rights, which she waived orally and in writing and agreed to speak with investigators. LEWIS admitted to law enforcement that she had a Zipcar account and that she was the only individual on the account. LEWIS informed investigators that the Zipcar app was still on her phone. Investigators seized her phone pursuant to the warrant and it was sent to a digital evidence laboratory for subsequent forensic analysis.

47. LEWIS admitted to investigators that she knew and was friends with DEMOSTHENE. When investigators asked her to explain why DEMOSTHENE would run to

her Zipcar after robbing someone, LEWIS stated that she was unaware of any robbery but admitted she was in the car on Hiawatha Street at the time of the robbery. At this point LEWIS was unwilling to answer any additional questions and the interview was terminated.

CONCLUSION

48. Based on the foregoing, I submit that there is probable cause to believe that:
- a. On or about November 29, 2022, in the District of Massachusetts, Myesha LEWIS and Kenneth DEMOSTHENE did assault VICTIM 1, a person having lawful charge, custody, and control of United States mail matter, money, and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States; in violation of Title 18, United States Code, Section 2114 and Section 2;
 - b. about December 16, 2022, in the District of Massachusetts, Myesha LEWIS and Kenneth DEMOSTHENE did assault VICTIM 2, a person having lawful charge, custody, and control of United States mail matter, money, and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, and in doing so put the life of Victim 2 in jeopardy by the use of a dangerous weapon, to wit: a knife; in violation of Title 18, United States Code, Section 2114; and Section 2;
 - c. On or about November 29, 2022, in the District of Massachusetts, Myesha LEWIS and Kenneth DEMOSTHENE did forcibly assault, resist, oppose, impede, intimidate, and interfere with Victim 1, a United States Postal Employee, while

Victim 1 was engaged in the performance of his official duties; in violation of Title 18, United States Code Section 111(a)(1) and Section 2;

d. On or about December 16, 2022, in the District of Massachusetts, Myesha LEWIS and Kenneth DEMOSTHENE did forcibly assault, resist, oppose, impede, intimidate, and interfere with Victim 2, a United States Postal Employee, while Victim 2 was engaged in the performance of his official duties, and did thereby use a deadly or dangerous weapon, to wit: a knife; in violation of Title 18, United States Code Sections 111(a)(1) and (b) on December 16, 2022 and Section 2.

Respectfully submitted,



Daniel A Lee
U.S. Postal Inspector
U.S. Postal Inspection Service

Sworn to before me via telephone in accordance with Fed. Rule Crim. P. 4.1 on May 10th, 2023.



HONORABLE JENNIFER C. BOAL
UNITED STATES MAGISTRATE JUDGE

