

Approved: J. [Signature]
MARGARET GRAHAM/THOMAS A. MCKAY
Assistant United States Attorneys

Before: HONORABLE FRANK MAAS
United States Magistrate Judge
Southern District of New York

15 MAG 1906

----- X -----
UNITED STATES OF AMERICA : SEALED COMPLAINT
- v. - : Violations of
TERRY JACKSON, : 18 U.S.C. §§ 1341, 1349,
MAHOGANY STRICKLAND, and : 1708, 2
NICKYEVES SAINTALBORD, :
Defendants. : COUNTY OF OFFENSE:
NEW YORK

----- X -----
SOUTHERN DISTRICT OF NEW YORK, ss.:

JAMIE TRELLES, being duly sworn, deposes and says that she is a Special Agent with the United States Postal Service, ~~Office of the Inspector General (the "USPS-OIG"), and charges as follows:~~

COUNT ONE
(Conspiracy to Commit Mail Fraud)

1. From at least in or about November 2013 up to and including at least in or about January 2014, in the Southern District of New York and elsewhere, TERRY JACKSON, MAHOGANY STRICKLAND, and NICKYEVES SAINTALBORD, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit mail fraud in violation of Title 18, United States Code, Section 1341.

2. It was a part and object of the conspiracy that TERRY JACKSON, MAHOGANY STRICKLAND, and NICKYEVES SAINTALBORD, 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, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and would and did take and receive therefrom, such matter and thing, and would and did knowingly cause to be delivered by mail according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, a matter and thing, in violation of Title 18, United States Code, Section 1341, to wit, JACKSON, STRICKLAND and SAINTALBORD fraudulently obtained property through the Postal Service's "Operation Santa" program, which was sent using the United States mail.

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

COUNT TWO
(Mail Fraud)

3. From at least in or about November 2013 up to and including at least January 2014, in the Southern District of New York and elsewhere, TERRY JACKSON, MAHOGANY STRICKLAND, and NICKYEVES SAINTALBORD, 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, for the purpose of executing such scheme and artifice and attempting to do so, placed in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service and deposited and caused to be deposited a matter and thing to be sent and delivered by private and commercial interstate carrier, and took and received therefrom, such matter and thing, and knowingly caused to be delivered by mail and such carrier according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, any such matter and thing, to wit, JACKSON, STRICKLAND and SAINTALBORD fraudulently obtained property through the Postal Service's "Operation Santa" program, which was sent using the United States mail.

(Title 18, United States Code, Sections 1341 and 2.)

COUNT THREE
(Receipt of Stolen Mail)

4. From at least in about December 2013 up to and including the present, in the Southern District of New York and elsewhere, TERRY JACKSON and MAHOGANY STRICKLAND, the

defendants, unlawfully and knowingly bought, received, concealed, and had in their possession letters, postal cards, packages, bags, and mail, and articles and things contained therein, which had been stolen, taken, embezzled, and abstracted from and out of the mail, post office, and station thereof, and from a mail route and other authorized depository for mail matter, and from a letter and mail carrier, knowing it to have been so stolen, taken, embezzled, and abstracted, to wit, JACKSON and STRICKLAND possessed numerous items stolen from the Postal Service's "Operation Santa" program, including electronics, clothing, and other consumer goods.

(Title 18, United States Code, Sections 1708 and 2.)

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

5. I am a Special Agent with the USPS-OIG, and I have been employed at USPS-OIG since in or about September 2012. I have been personally involved in the investigation of this matter, and I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents and my examination of various reports and records. 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 the course of the investigation. ~~Where the contents of~~ conversations of others are reported herein, they are reported in substance and in part.

Operation Santa

6. Based on my review of publicly available documents on the USPS website and my interviews with USPS employees, I know the following:

a. Operation Santa is an annual program run by the USPS to benefit underprivileged children. Children from across the country write letters to Santa requesting holiday gifts, and Operation Santa seeks to make these children's wishes come true by finding individual and corporate donors who will purchase the requested gifts.

b. When the USPS receives a child's letter to Santa, a USPS employee opens and sorts the letter. A USPS employee then copies the letter and labels both the original letter and the copy with the same unique identification number. The

original letter is filed in numerical order and secured, and the child's address is entered into a computer database.

c. USPS employees then redact all of the child's personal information from the copy of the letter and place the resulting version of the letter (the "Redacted Letter") in a public "adoption" area.

d. Individual customers or corporate representatives ("Secret Santas") may come to the Post Office to "adopt" a letter. Once a Secret Santa presents identification to a USPS employee and fills out appropriate forms, he or she may choose up to 10 letters to adopt. The Secret Santa then takes the Redacted Letter that he or she is "adopting."

e. Once the Secret Santa has purchased the gift requested in the Redacted Letter, he or she must return to the Post Office with the gift wrapped and boxed. Because the child's identifying information is not on the Redacted Letter, however, the Secret Santa does not address the gift to the child.

f. A USPS employee takes the gift from the Secret Santa, looks up the identification number on the Redacted Letter in the computer database to determine the child's address, and either creates a mailing label or hand-writes the child's address on the box containing the gift. The Secret Santa then pays the postage for the gift, but never sees the address for the child.

g. A USPS employee then places the gift in the mail stream, to be delivered to the child who requested the gift.

The Defendants

7. Based on my review of USPS records and my interviews with the defendants and others, I know the following:

a. TERRY JACKSON, the defendant, was employed by the USPS from in or about November 2013 to in or about January 2014. During that time, he worked at the Operation Santa headquarters located at the James A. Farley Post Office on Eighth Avenue in Manhattan (the "Operation Santa Headquarters"). JACKSON was primarily responsible for organizing, redacting, and filing Operation Santa letters, but also performed other duties on occasion.

b. MAHOGANY STRICKLAND, the defendant, has been employed by the USPS since in or about October 2013. Between in or about November 2013 and in or about January 2014, she worked at the Operation Santa Headquarters. STRICKLAND was primarily responsible for greeting Secret Santas and providing them with letters to adopt, but also performed other duties on occasion such as labeling packages with children's addresses. At all relevant times, STRICKLAND has lived at an apartment on Saint Nicholas Avenue in New York, New York.

c. NICKYEVES SAINTALBORD, the defendant, has been employed by the USPS since in or about November 2013. Between in or about November 2013 and in or about January 2014, he worked at the Operation Santa Headquarters. SAINTALBORD was primarily responsible for copying and redacting Operation Santa letters.

The Letter-Copying Scheme

8. Based on my interviews with current and former USPS employees, including the defendants, my conversations with other law enforcement officials, and my review of USPS records, I know that from in or about November 2013 to in or about January 2014, USPS employees working for Operation Santa, including TERRY JACKSON, MAHOGANY STRICKLAND, and NICKYEVES SAINTALBORD, the defendants, carried out a scheme to fraudulently obtain ~~electronics, clothing, and other consumer goods, which would~~ have otherwise been delivered to underprivileged children through the Operation Santa program, by writing their own letters and ensuring that those letters were selected by Secret Santas. The scheme generally worked as follows:

a. A USPS employee (the "Writer") working at Operation Santa would write a letter to Santa. Although nominally on behalf of a child, such letters were often written on behalf of the employees themselves, adult family members or friends, or fictional children.¹

¹ The USPS employee tasked with supervising Operation Santa (the "Supervisor") told employees that their children could write letters to Santa. The Supervisor did not tell employees that they could write letters on behalf of adults or fictional children, however. The Supervisor also told employees that any letters written by their children were to be mailed to Operation Santa in the ordinary course. That is, the Supervisor did not instruct employees that they could bring such letters directly

b. The Writer would then bring the letter to the Operation Santa Headquarters and make multiple copies of the letter, in order to increase the odds that the letter would be selected by a Secret Santa. The Writer would either make the copies himself or herself, or ask one of the employees, such as JACKSON and SAINTALBORD, tasked with copying and filing letters to make copies of the letter.

c. The Writer would then deliver the letter to one of the employees, such as STRICKLAND, who worked in the public "adoption" area and interacted with Secret Santas. That employee would ensure that the Writer's letter and its copies were prominently placed in the adoption area, thus increasing the likelihood that the letter would be selected by a Secret Santa.

d. STRICKLAND maintained a list containing the names of other participants in the scheme and the identifying numbers for the letters they had written. STRICKLAND would then inform the Writer of each letter when his or her letter had been adopted by a Secret Santa.

e. Once the Secret Santa fulfilled the request in the Writer's letter and brought the gift to the Operation Santa Headquarters, one of the employees tasked with labeling the gifts would mail the gift to the Writer, who would then keep the gift for his or her own personal use.

f. During the 2013 holiday season, the USPS received more than 300,000 letters written to Santa by children hoping to receive gifts. Although USPS employees processed more than 7,000 of these letters, less than half of the letters that were processed were ultimately adopted by Secret Santas. Thus, because Operation Santa was not able to fulfill all of the requests, every gift that was fraudulently obtained by a participant in the scheme effectively deprived an underprivileged child of a gift.

9. On or about February 24, 2015, I interviewed TERRY JACKSON, the defendant, at his residence. After he was advised

to the Post Office and hand them to customers in a manner that would ensure the employees' letters were more likely to be "adopted" than letters written by children who were not related to employees.

of his *Miranda* rights, JACKSON agreed to speak with me and stated that he wrote four to five letters pretending to be a child and had two other participants, including NICKYEVES SAINTALBORD, the defendant, make 20 copies of each letter. As a result of his participation in this scheme – and in redirecting packages, as described *infra* – JACKSON stated that he received a printer, two laptop computers, two tablets, clothing, bedding, gift cards, and other items.

10. On or about June 13, 2014, I interviewed MAHOGANY STRICKLAND, the defendant, at USPS Police Headquarters. After she was advised of her *Miranda* rights,² STRICKLAND agreed to speak with me and stated that she and her family members, including adult family members, wrote multiple letters requesting gifts. STRICKLAND stated that she then made copies of these letters and ultimately received about two of each requested gift, including iPads, a laptop, headphones, clothing, and boots.

11. On or about June 23, 2014, I interviewed NICKYEVES SAINTALBORD, the defendant, at the Grand Central Station Post Office. After being advised of his *Miranda* rights, SAINTALBORD agreed to speak with me and stated that he wrote four letters pretending to be a child. SAINTALBORD stated that he then made five copies of each letter and gave the letters to one of the clerks assigned to handing out letters to customers. SAINTALBORD ultimately received numerous gifts, including headphones and boots.

Redirecting Packages

12. Based on my conversations with current and former USPS employees, including the defendants, my conversations with other law enforcement officials, and my review of USPS records, I know that from in or about November 2013 to in or about January 2014, USPS employees working for Operation Santa, including TERRY JACKSON and MAHOGANY STRICKLAND, the defendants, in addition to obtaining gifts through the letter-copying scheme described above, stole packages intended for underprivileged children by simply replacing the correct mailing address for the intended recipient with their own mailing addresses.

² STRICKLAND was initially advised of her *Garrity* rights, which include some, but not all, of the *Miranda* rights. At a later point during the interview, STRICKLAND was advised of her *Miranda* rights.

13. During the February 24, 2015 interview described above, TERRY JACKSON, the defendant, stated that he entered the database used to store children's addresses and placed his own address on the shipping line for Operation Santa packages approximately fifty times. As a result, packages intended for children instead were shipped to JACKSON's residence.

14. On or about February 24, 2015, during a consensual search of JACKSON's apartment, electronics and a gift card, all of which JACKSON stated he had obtained from Operation Santa, were recovered.

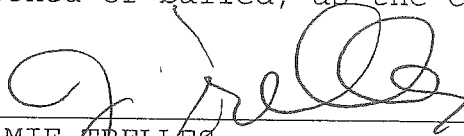
15. During the June 13, 2014 interview described above, MAHOGANY STRICKLAND, the defendant, stated that she re-labeled Operation Santa packages with her own address on three to four separate occasions.

16. On or about January 7, 2015, I interviewed a USPS employee ("Witness-1") who worked for Operation Santa but did not participate in the scheme. Witness-1 remembered seeing numerous boxes addressed to the same apartment, located on a street that included the word "Nicholas" (the "Nicholas Address"). Witness-1 recalled that another employee told Witness-1 that the employee lived at the Nicholas Address. After viewing a set book of approximately twenty photographs, Witness-1 identified a photograph of STRICKLAND as the employee who said she lived at the Nicholas Address.

17. In or about January 2014, two Operation Santa packages were returned to the Post Office after unsuccessful delivery. Both were addressed to STRICKLAND's Saint Nicholas Avenue address.

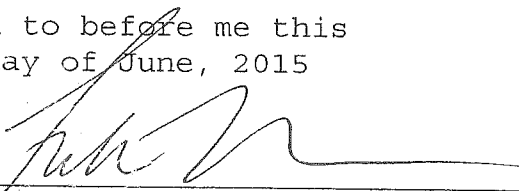
18. On or about June 13, 2014, STRICKLAND was shown these boxes and admitted that she had hand-written her address on each of them. A subsequent search of these boxes, conducted pursuant to a judicially authorized warrant, revealed that they contained clothing, a toy train, and boots.

WHEREFORE, deponent respectfully requests that warrants be issued for the arrests of TERRY JACKSON, MAHOGANY STRICKLAND, and NICKYEVES SAINTALBORD, the defendants, and that they be arrested and imprisoned or bailed, as the case may be.



JAMIE TRELLES
SPECIAL AGENT
USPS-OIG

Sworn to before me this
4th day of June, 2015



THE HONORABLE FRANK MAAS
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK