IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

HACHIKOSELA MUCHIMBA,

Defendant.

UNDER SEAL

Case: 1:23-mj-00257

Assigned to: Judge Meriweather, Robin M.

Assign Date: 9/19/2023

Description: COMPLAINT W/ ARREST WARRANT

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Gilbert Petit-Compere, a Special Agent with the United States Department of Treasury, Inspector General for Tax Administration ("TIGTA"), being duly sworn, depose and state that:

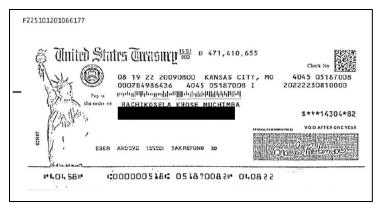
- 1. I have been a Special Agent with TIGTA since 2017. I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center, as well as the TIGTA Special Agent Basic Training Academy. My responsibilities include investigating Internal Revenue Service (IRS) employees, contractors and all others who committed financial fraud towards the United States federal government and its infrastructure. I have received specialized training and have participated in investigations relating to individuals who have stolen Treasury-IRS checks, generally, counterfeited, duplicate, forged and/or altered official documents, and committed identity theft. I have conducted or participated in a variety of criminal investigations and have experience analyzing financial documents, interviewing suspects and witnesses, conducting physical and electronic surveillance, serving search and arrest warrants, and collecting, preserving, and examining physical and electronic evidence.
- 2. This affidavit is submitted in support of a criminal complaint and arrest warrant charging that from on or about October 2021 through in or about March 2023, in Washington,

D.C., and elsewhere, HACHIKOSELA MUCHIMBA did knowingly execute a scheme to steal mail matter in violation of 18 U.S.C. § 1709 and to defraud a financial institution, in violation of 18 U.S.C. § 1344.

3. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observation during the course of this investigation, as well as the observations of other law enforcement officers involved in this investigation. This affidavit contains information necessary to support probable cause, but it is not intended to include each and every fact and matter observed by me or known to the United States.

PROBABLE CAUSE

- 4. TIGTA and other law enforcement agencies are investigating a series of mail thefts at the Friendship Post Office Station located at 4005 Wisconsin Avenue NW, Washington, DC 20016, within the District of Columbia. In January 2023, a postal customer who resides in Washington, D.C., reported his U.S. Treasury check was stolen from the mail and fraudulently negotiated. At around the same time, law enforcement identified five U.S. Treasury checks that had been fraudulently negotiated into an account at TD Bank (x-1517).
- 5. On January 3, 2023, a postal customer ("W-1") provided me with a copy of a U.S. Treasury check in the amount of \$14,304.82 that was written pay to the order of "Hachikosela Khose Muchimba, **** Hayes Street NE, ******, Washington, DC 20019-1804." This check was supposed to be addressed to W-1 (and payable to W-1) but W-1 had never received the check. This check was endorsed on the back pay to the order of "Double Blue Investments" and deposited via mobile application on September 7, 2022, into TD Bank account x-1517.

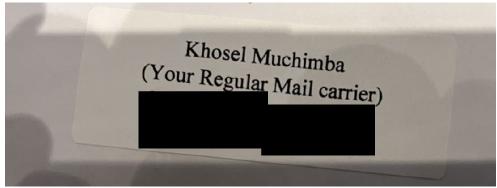


Picture 1- Front of Check



Picture 2 - Back of Check

6. W-1 recognized the name and the address on the U.S. Treasury check as the same name and address that W-1's mail carrier had used on a holiday card. According to this customer, this USPS mail carrier provided holiday cards to the residents on his mail route in December 2022. W-1 showed me the mailing label that appeared on the holiday card from his mail carrier.



Picture 3 - Photograph of Mailing Label

7. On January 12, 2023, I learned from TD Bank that account x-1517 belongs to "Double Blue Investments LLC" (TIN: x-0832) with an address at **** Hayes Street NE, ****, Washington, D.C. 20019. Account x-1517 was opened on October 5, 2021, at the TD Bank branch

located at Rhode Island Place in Washington, D.C. The customer who opened the account was HACHIKOSELA MUCHIMBA (DOB: xx/xx/1980; SSN: x-3502) and MUCHIMBA is thoe only person authorized to conduct transactions on this account.

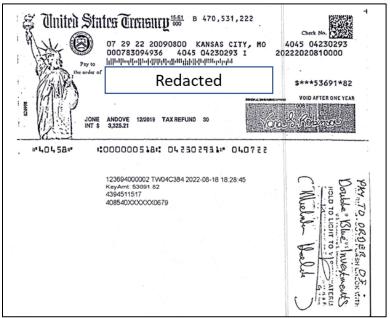
8. TD Bank provided copies of four additional U.S. Treasury checks that were fraudulently negotiated into TB Bank account x-1517. These checks were all written pay to the order "Hachikosela Khose Muchimba, ***** Hayes St NE, *****, Washington, DC 20019-1804." The back of each of these checks were also endorsed pay to the order of "Double Blue Investments." TD Bank provided a U.S. Treasury Check Reclamation Statement for each of these checks that identifies the victim whom this check was originally written to and the amount of the stolen U.S. Treasury check that was fraudulently negotiated. The amounts of these four additional U.S. Treasury checks and the dates they were deposited into account x-1517 were as follows:

CHECK NUMBER	DEPOSIT DATE	AMOUNT
4041-82505263	12/13/2021	\$30,495.15
4045-02544139	7/18/2022	\$2,935.96
4045-04230290	8/2/2022	\$18,362.00
4045-04899401	8/16/2022	\$2,275.96

The original payee information was removed from these four U.S. Treasury checks and the check provided by W-1, and replaced with MUCHIMBA's name and address.

9. During this investigation, I have obtained and reviewed other bank records for TD Bank account x-1517 opened by MUCHIMBA in the name of Double Blue Investments. On or about August 18, 2022, another U.S. Treasury check (No. 4045-04230293) was deposited into

account x-1517 in the amount of \$53,691.82 at an ATM. However, the name and address for the original payee was not removed from this check when it was deposited into account x-1517. The mailing address for this original payee was in Washington, D.C.



Picture 4 - ATM Deposit on 8/18/2022 into Account x-1517

10. Surveillance photographs from TD Bank depict the same person making multiple ATM transactions with account x-1517. For example, the bank provided the following picture of the individual who deposited U.S. Treasury check number 4045-04230293 in the amount of \$53,691.82 on August 18, 2022:



Picture 5 - Photograph from 8/18/2022 ATM Deposit

11. Surveillance photographs also captured the same person withdrawing \$1,000 from account x-1517 on four subsequent dates: September 20, 2022; September 22, 2022; September 28, 2022; and October 6, 2022. In three of these surveillance photographs, the person appears to be wearing U.S. Postal Service clothing typically worn by employees.



Picture 6 - \$1,000 ATM Withdrawal on 9/20/2022



Picture 7 - \$1,000 ATM Withdrawal on 9/20/2022



Picture 8 - \$1,000 ATM Withdrawal on 9/28/2022

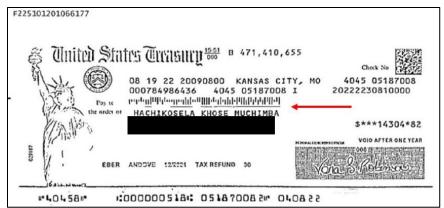


Picture 9 - \$1,000 ATM Withdrawal on 10/6/2022

12. I have reviewed known photographs of MUCHIMBA and I have personally met with MUCHIMBA on multiple occasions. The person who made the ATM transactions in the foregoing pictures was MUCHIMBA. MUCHIMBA is also the only person who is authorized to

make transactions in TD Bank account x-1517 which MUCHIMBA opened in the name of Double Blue Investments.

- 13. MUCHIMBA began employment at the USPS as a mail carrier on February 16, 2020, at the Friendship Post Office Station located at 4005 Wisconsin Avenue NW, Washington, D.C. MUCHIMBA's home address on record at the USPS is ***** Hayes St NE,****, Washington, D.C. 20009. His date of birth is x/x/1980, and his Social Security Number is XXX-XX-3502. His assigned mail route at the Friendship Post Office Station was route 23 since January 31, 2021. MUCHIMBA. On March 29, 2023, MUCHIMBA was placed on an off-duty (without pay) status as a result of his alleged involvement of loss of mail and funds.
- 14. Law enforcement has conducted an analysis to determine how MUCHIMBA came into possession of the six U.S. Treasury checks referenced earlier in this affidavit. Five of these checks were originally addressed to customers assigned to mail route 23 which was MUCHIMBA's delivery route. One check was addressed to a customer who does not live on MUCHIMBA's mail route but whose mail is delivered by a different mail carrier who works at the Friendship Post Office Station.
- 15. MUCHIMBA altered the U.S. Treasury checks he stole and added his name and address to the check before depositing them. Evidence of such an alteration can be seen on two of the checks that were fraudulently deposited in account x-1517 by MUCHIMBA via mobile application.



Picture 10 - Check with Evidence of Alteration



Picture 11 - Check with Evidence of Alteration

- 16. The total amount of the U.S. Treasury checks referenced above that were fraudulently deposited into MUCHIMBA's account at TD Bank in the name of Double Blue Investments is \$122,065.71.
- 17. Law enforcement executed a search warrant at MUCHIMBA's personal residence on March 29, 2023. In the course of that search, law enforcement recovered an ATM receipt that reflected a deposit of a U.S. Treasury Check in the amount of \$415,173.53 into Sandy Spring Bank account x-8901.
- 18. On March 24, 2023, MUCHIMBA deposited a U.S. Treasury Check in the amount of \$415,173.53 into Sandy Spring Bank account x-8901.



Picture 12 - ATM Receipt Recovered March 29, 2023

MUCHIMBA controlled Sandy Spring Bank Account x-8901 and MUCHIMBA was the only person authorized to make transactions with that Account. The U.S. Treasury check depicted in the ATM receipt was addressed to a person who is not MUCHIMBA. The intended recipient of this check did not authorize MUCHIMBA to possesses this check or to deposit the check into MUCHIMBA's bank account.

19. During this investigation, law enforcement has reviewed financial records for additional bank accounts that MUCHIMBA controlled bank at seven financial institutions:

Sandy Spring Bank, TD Bank, Capital One, Bank of America, Citibank, JP Morgan Chase,
Digital Credit Union, Ally Bank, Sutton Bank, and First National Bank. For the time period
October 2021 through March 2023, MUCHIMBA deposited approximately 98 misappropriated checks into those seven bank accounts with an aggregate value of \$1,697,909.52. At least 90 of those misappropriated checks were U.S. Treasury checks that were not addressed to
MUCHIMBA; the remaining checks were issued by private parties to persons other than
MUCHIMBA.

CONCLUSION

20. Based on the foregoing, I submit there is probable cause to conclude that from in or around October 2021 through in or around March 2023, in the District of Columbia, and elsewhere, HACHIKOSELA MUCHIMBA did knowingly execute a scheme to steal mail, in violation of 18 U.S.C. § 1709 and to defraud a financial institution, in violation of 18 U.S.C. § 1344.

Respectfully submitted,

Special Agent Gilbert Petit-Compere United States Department of the Treasury

Inspector General for Tax Administration (TIGTA)

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on September 19, 2023.

Honorable Robin M. Meriweather

United States Magistrate Judge