

STATEMENT OF OFFENSE

I, Vlad Boscor, Special Agent of the Department of Homeland Security Homeland Security Investigations (HSI), being duly sworn, hereby depose and state the following:

INTRODUCTION

1. This Affidavit is submitted in support of a Criminal Complaint charging Tisha LEE (hereinafter “LEE”) with eight violations of Title 18 U.S.C. § 1343, that is, Wire Fraud, one violation of Title 18 U.S.C § 371, that is, Conspiracy to Defraud the United States, one violation of Title 18 U.S.C. § 1349, Conspiracy to Commit Wire Fraud, and eight violations of Title 18 U.S.C. § 1030(a)(4), Fraud in Connection with Computers, that is, knowingly and with intent to defraud, access a protected computer without authorization, or exceeds authorized access, and by means of such conduct furthers the intended fraud and obtains anything of value.

2. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, that statement is described in substance and is not intended to be a verbatim recitation of such statement. Wherever in this affidavit I quote statements, those quotations have been taken from draft transcripts, which are subject to further revision.

3. Unless otherwise stated, the conclusions and beliefs I express in this affidavit are based on my training, experience, and knowledge of the investigation, and reasonable inferences I’ve drawn from my training, experience, and knowledge of the investigation.

AFFIANT BACKGROUND

4. Your Affiant is a Special Agent with Homeland Security Investigations (HSI), assigned to the Special Agent in Charge (SAC) D.C. field office. I have been employed with HSI since May 2020. Prior to my Special Agent position with HSI, I was a sworn federal officer with the United States Capitol Police. Prior to my position with the United States Capitol Police, I was a

Paralegal with the United States Attorney's Office. I am currently assigned to the investigative fraud cell as part of the Make DC Safe and Beautiful Task Force, where my duties and responsibilities include the investigation of federal crimes concerning Wire Fraud and Conspiracy. I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a). I am therefore authorized to make applications for search and seizure warrants and to serve arrest warrants.

5. Because this Affidavit is offered for the limited purpose of establishing probable cause to support the criminal complaint, it contains only a summary of relevant facts. I have not included details of every aspect of this investigation to date. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for issuance of the criminal complaint. The information contained in this Affidavit is based upon my personal knowledge of and participation in the investigation, a review of documents and other evidence, and conversations with other law enforcement officers and other individuals. All conversations and statements described in this Affidavit are related in substance and in part unless otherwise indicated.

PROBABLE CAUSE

A. LEE AND KELLY

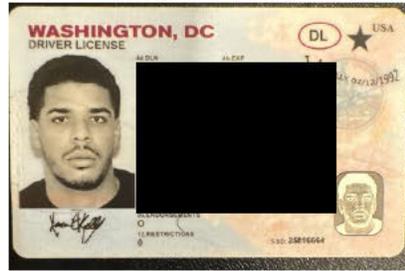
6. HSI, along with other law enforcement agencies, has been investigating Imani **KELLY** for violations of various federal offenses, including Misuse of Social Security Number.

7. The Social Security Administration Office of Inspector General confirmed that **KELLY** was issued the genuine SSN of [REDACTED]

8. **KELLY** previously provided his genuine SSN of [REDACTED] on his United States Passport Application, which he submitted to the United States Government.

9. Law enforcement discovered that **KELLY** applied for, and is the current leaseholder, for apartment [REDACTED] apartment building located at [REDACTED]

10. As part of the lease application process, **KELLY** provided his genuine Washington DC Driver's License:



11. **KELLY** also provided the following Social Security Card as part of the lease application process:

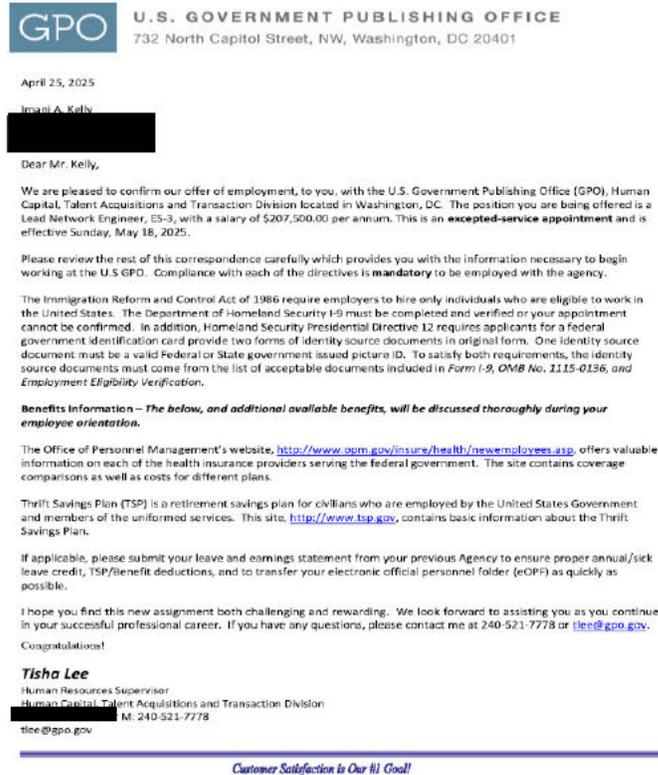


12. The Social Security Administration Office of Inspector General has confirmed that the above SSN [REDACTED] has not been issued to any person.

13. Records received from [REDACTED] apartment building indicated that **KELLY**'s apartment that was obtained using the counterfeit SS card and the fraudulent GPO employment verification letter (see below) is approximately \$25,000 USD in arrears.

14. **KELLY** was arrested on 02/24/26 pursuant to a federal arrest warrant issued out of the United States District Court for the District of Columbia.

15. **KELLY**, in addition to the counterfeit SS card, also submitted an employment verification letter to [REDACTED] Apartment Building. The document is as follows:



16. The Government Publishing Office, Office of Inspector General (GPO OIG), confirmed that the above letter, which bears **LEE**’s electronic signature, is fraudulent and that **KELLY** has never been employed by GPO nor has he been an applicant for a position with GPO.

17. The address that is listed for **KELLY** on the above GPO letter [REDACTED] [REDACTED] is directly next to a Mr. Christopher Thomas Charles’ [REDACTED] address of [REDACTED] (based on searches of available law enforcement databases). Those same databases indicate that the above-mentioned individual is the father of Christopher Thomas **CHARLES** [REDACTED]. Available databases show that **CHARLES** has previously traveled with **LEE** internationally and **CHARLES**’ cell phone number is listed on the same travel reservation. Toll analysis has determined that **CHARLES**’ phone number was

the number one most frequent phone interaction on **LEE**'s cellphone.

18. GPO OIG conducted surveillance on 02/24/2026 of [REDACTED] [REDACTED] (listed address for **CHARLES**). Surveillance observed a Dodge Durango with [REDACTED] [REDACTED], which GPO OIG confirmed is registered to **CHARLES**. On 02/25/2026, GPO OIG observed a Chevy Malibu at that same address with VA tag [REDACTED] registered to **LEE**.

19. GPO OIG has confirmed that **LEE** is currently employed at GPO working at the Human Capital section as a contract employee and has been employed since March of 2025.

20. GPO OIG has confirmed that **LEE** does not have the authority to create or transmit employment offer letters on behalf of GPO.

21. GPO OIG also confirmed that **LEE** sent that fraudulent letter (**TARGET LETTER 1**) to **KELLY** from her government email address [REDACTED]) on March 31st, 2025 to the same email address that **KELLY** has listed on his [REDACTED] lease application [REDACTED]). GPO OIG discovered that email on **LEE**'s government email profile under the Sent Items section.

22. **LEE** provided her personal cell phone number on two of the fraudulent GPO employment letters **TARGET LETTER 1** and **TARGET LETTER 2** that she emailed out in March and April of 2025. **LEE** was the listed subscriber for the phone number during the time frame when she emailed those letters in March and April of 2025.

23. **LEE** also provided a GPO hosted phone number that forwards to her GPO Microsoft Teams account on all eight of the target letters sent from her government email address, which was confirmed by GPO OIG.

24. Analysis was conducted on **LEE**'s phone toll records. The analysis yielded observations of **KELLY** and **LEE** having numerous phone interactions; to include the day after (May 23rd,

2025) the [REDACTED] lease application was signed (May 22nd, 2025).

25. GPO OIG has discovered additional fraudulent employment letters that were sent by LEE to external email addresses.

26. On April 11th, 2025, LEE (from her GPO email address) sent another fraudulent offer letter (**TARGET LETTER 2**) to a Mauro Cruz-Sanchez at [REDACTED]. GPO OIG has confirmed that **TARGET LETTER 2** is fraudulent and that Mauro Cruz-Sanchez has never been employed by GPO nor has he been an applicant for a position with GPO.

27. On May 13th, 2025, LEE (from her GPO email address) sent another fraudulent offer letter (**TARGET LETTER 3**) to a Darrius Vaughn at [REDACTED]. GPO OIG has confirmed that **TARGET LETTER 3** is fraudulent and that Darrius Vaughn has never been employed by GPO nor has he been an applicant for a position with GPO.

28. On May 22nd, 2025, LEE (from her GPO email address) sent another fraudulent offer letter (**TARGET LETTER 4**) to a Dene Fenwick at [REDACTED]. GPO OIG has confirmed that **TARGET LETTER 4** is fraudulent and that Dene Fenwick has never been employed by GPO nor has she been an applicant for a position with GPO.

29. On September 24th, 2025, LEE (from her GPO email address) sent another fraudulent offer letter (**TARGET LETTER 5**) to a China Felix at [REDACTED]. GPO OIG has confirmed that **TARGET LETTER 5** is fraudulent and that China Felix has never been employed by GPO nor has she been an applicant for a position with GPO.

30. On October 16th, 2025, LEE (from her GPO email address) sent another fraudulent offer letter (**TARGET LETTER 6**) to a Joshua D. Burgner at [REDACTED]. GPO OIG has confirmed that **TARGET LETTER 6** is fraudulent and that Joshua D. Burgner has never been employed by GPO nor has he been an applicant for a position with GPO.

31. On October 16th, 2025, LEE (from her GPO email address) sent another fraudulent offer letter (**TARGET LETTER 7**) to a Roger J. Blum at [REDACTED] GPO OIG has confirmed that **TARGET LETTER 7** is fraudulent and that Roger J. Blum has never been employed by GPO nor has he been an applicant for a position with GPO.

32. On December 11th, 2025, LEE (from her GPO email address) sent another fraudulent offer letter (**TARGET LETTER 8**) to an India Thomas at [REDACTED]. GPO OIG has confirmed that **TARGET LETTER 8** is fraudulent and that India Thomas has never been employed by GPO nor has she been an applicant for a position with GPO.

33. Law enforcement has taken steps to attempt to identify the individuals that were the recipients of these fraudulent letters.

34. Law enforcement database records checks for a Dene Fenwick (recipient of **TARGET LETTER 4**) yielded results for an individual by that name with criminal history under the FBI Number [REDACTED]. Fenwick also has a current landlord tenant proceeding in MD that was filed on January 20th, 2026 for failure to pay rent.

35. Law enforcement database records checks for an India Thomas yielded results for an individual by that name who had a previous landlord tenant proceeding in MD that was filed on August 21st, 2025, but has since been closed. Of note, India Thomas appears to have moved into an apartment at the address of [REDACTED] in December of 2025 (the same month that LEE sent **TARGET LETTER 8**).

CONCLUSION

36. Based on the above-referenced facts, your affiant asserts that there is probable cause to support the issuance of a Criminal Complaint charging **LEE** with eight violations of Title 18 U.S.C. § 1343, that is, Wire Fraud, one violation of Title 18 U.S.C § 371, that is, Conspiracy to Defraud the United States, one violation of Title 18 U.S.C. § 1349, that is, Conspiracy to Commit Wire Fraud, and eight violations of Title 18 U.S.C. § 1030, that is, Fraud in Connection with Computers.

Respectfully submitted,



Vlad Boscor
Special Agent
Homeland Security Investigations

Affidavit submitted by email and attested to me as true and accurate by telephone pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on the 6th day of March 2026.

The Honorable Matthew Sharbaugh
United States Magistrate Judge