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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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22-MJ-1011

UNITED STATES OF AMERICA

**TO BE FILED UNDER SEAL**

- against -

AFFIDAVIT AND  
COMPLAINT IN SUPPORT  
OF AN APPLICATION FOR  
AN ARREST WARRANT

QUADRI GARNES,

Defendant.

(18 U.S.C. § 115(a)(1)(B))

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EASTERN DISTRICT OF NEW YORK, SS:

JACOB SIMKOVITZ, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

On or about September 29, 2022, within the Eastern District of New York and elsewhere, the defendant QUADRI GARNES did knowingly and intentionally threaten to assault and cause serious bodily injury to one or more United States officials by use of a dangerous weapon, with intent to impede, intimidate, and interfere with such officials while engaged in the performance of their official duties, and with intent to retaliate against such officials on account of the performance of their official duties.

(Title 18, United States Code, Section 115(a)(1)(B))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”) assigned to the New York Division – Brooklyn External Crimes Team. I have been employed by the USPIS since January of 2022. The USPIS is the federal agency charged with investigating violations of criminal and civil statutes related to the United States Postal Service (“USPS”). I graduated from the Basic Inspector Training Program at the Career Development Unit and have received training in investigating violations of federal law relating to mail theft, mail fraud, credit card fraud, bank fraud, identity theft, and narcotics offenses among other violations.

2. On or about the morning of September 29, 2022, the defendant QUADRI GARNES called the New York State Department of Labor (“DOL”) seeking to obtain unemployment benefits associated with his former employment as a city carrier assistant with the USPS. Employment records obtained for GARNES show that he was an employee at the Homecrest Station of the USPS located in Brooklyn, New York. The last known home address for GARNES was Avenue B in Brooklyn, New York.

3. The call placed by the defendant QUADRI GARNES was answered by an employee of the DOL or (“DOL Employee-1”). I understand that during GARNES’S call with DOL Employee-1 that the call disconnected and DOL Employee-1 called him back and that the call was later transferred to a supervisor (“DOL Employee-2”) based on GARNES’S demeanor. GARNES’S interaction with the DOL employees were recorded. I have obtained a copy of the recordings and have reviewed them. During the call, GARNES identified himself by providing his name, Social Security number and mother’s maiden name. In expressing his frustration with the DOL and his inability to get unemployment benefits, GARNES stated, in sum and substance, “I can’t get what I worked for.” He also stated, in sum and substance, “So I have to go to the

Post Office and shoot the Post Office up, right?” These statements were in the course of a conversation about how to receive funds he believed he was owed. Based on GARNES’S statement, I submit that it was his intention to travel to a United States Postal Office location and harm employees at that location. Employees of the United States Postal Office are federal officials as defined in 18 U.S.C. § 115(a)(1) and § 1114.

4. In addition to making threats against federal officials, GARNES stated to DOL Employee-2 that if the DOL did not give him his unemployment benefit money, he was prepared also to go to the DOL office located in Downtown Brooklyn and open fire.

5. In furtherance of his plan to harm federal USPS employees and DOL employees, GARNES made the following statements, in sum and substance, during the recorded call:

- a. “Does the city want me to kill five or six people because I can’t pay rent?”
- b. “I have to go to the post office and shoot the post office up.”
- c. “I am going to be at the New York State Department of Labor down on Schermerhorn or Livingston street.” “I will make a big fucking deal out of it.”
- d. “Somebody might get shot today coming out of Department of Labor.”

6. During the same call, the defendant QUADRI GARNES acknowledged to the DOL employee that he understood that the line was recorded. He stated, in sum and substance, “And I am putting this out there because I know this is recorded because if I was to do something like that at least when they start going through the records, they know why it was done.” Based on my review of the call, the reference to “something like that” was shooting people at one of the above-mentioned government locations. GARNES also indicated to the DOL Employee that he was prepared to act on his statements by stating, in sum and substance,

“Just remember my name you might see it on TV tonight” and “My animosity ain’t towards you but whoever feels my animosity when I wake up in the morning I don’t care.”

7. In connection with my investigation, I have obtained the criminal record of the defendant QUADRI GARNES and learned that in 2004 he was convicted of criminal possession of a weapon in the fourth degree and sentenced to three years of incarceration. In addition, in 1994, he was convicted of rape in the first degree which involved forcible compulsion. During the recorded call, GARNES told the DOL employee that he had collectively spent 18.5 years in jail and that he was not worried about returning to jail because, in sum and substance, he would not have “to worry about paying [his] rent or card bills.” He also stated, in sum and substance, “As long as I am in the NYC jail, I am good” and “I get three meals and a bed in jail.”

8. Based on the foregoing facts, I submit that there is probable cause to believe that the defendant QUADRI GARNES committed violations of 18 U.S.C § 115(a)(1)(B).

WHEREFORE, your deponent respectfully requests that an arrest warrant for the defendant QUADRI GARNES so that he may be dealt with according to law.

It is further requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the Internet. Premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving the target notice of the existence and scope of the investigation, an opportunity to flee from prosecution, destroy or tamper with evidence, and/or change patterns of behavior.



JACOB SIMKOVITZ  
Postal Inspector, United States Postal Inspection  
Service

VIA TELEPHONE

Sworn to before me this  
6<sup>th</sup> day of October, 2022



THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK