

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Alabama

FILED

AUG -8 2023

United States of America)

v.)

Mekhi Diwone Harris, also known as "@01ihk,"
"@01ihk1," and "Khi,")

Mag No. 23-456)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/22/2022 - 8/8/2023 in the county of Jefferson in the
Northern District of Alabama, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 1349 and 1344

Conspiracy to commit bank fraud

This criminal complaint is based on these facts:

See Attached Affidavit.

Continued on the attached sheet.

Megan Grose Digitally signed by Megan Grose
Date: 2023.08.08 20:00:50 -05'00'

Complainant's signature

Special Agent Megan Grose, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

8.8.23

Judge's signature

City and state:

Birmingham, Alabama

Gray M. Borden, U.S. Magistrate Judge

Printed name and title

Affidavit in Support of Criminal Complaint

I, Megan Grose, being first duly sworn, hereby depose and state as follows:

I am a Special Agent with the Federal Bureau of Investigation. I have been assigned to the FBI Birmingham Division's Cyber Squad in Birmingham, Alabama, since December 2022. Since joining the FBI in July 2022, I have participated in numerous investigations and training sessions involving fraud, online illegal marketplaces, computer intrusions, cryptocurrency, and information technology.

As part of my duties as an FBI Special Agent, I investigate criminal violations relating to computer intrusion, fraud, and money laundering offenses. As a law enforcement officer, I have used a variety of methods to investigate crime, including, but not limited to, visual surveillance, suspect and witness interviews, and the use of search warrants. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

Telegram is a cloud-based instant messaging service that offers users the ability to send and receive end-to-end encrypted messages. A Telegram channel allows users to disseminate messages to Telegram users who subscribe to the channel. Each Telegram user has a username, also known as a handle, that identifies the user's account. The handle is preceded by an "@" symbol.

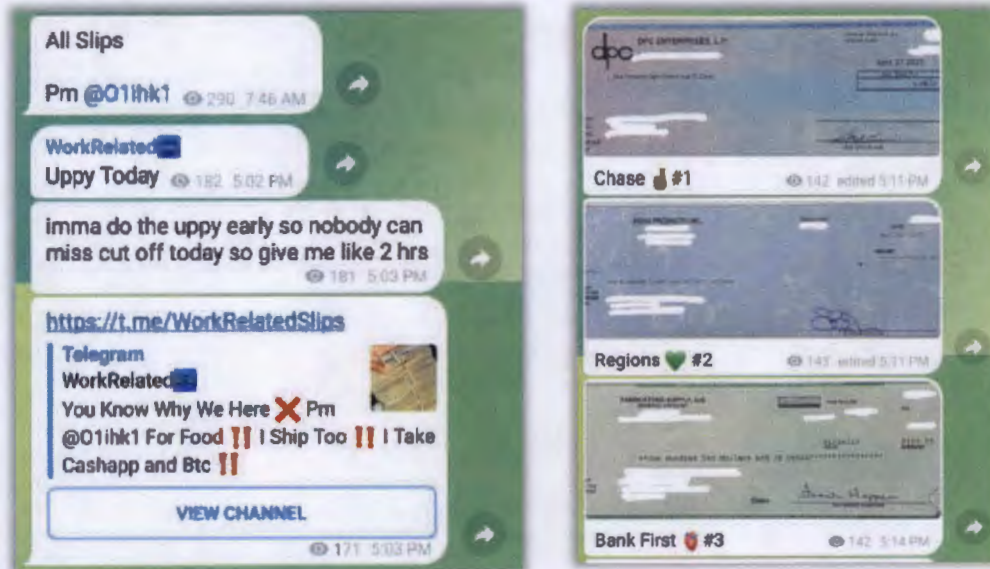
Based on my training and experience, I know that certain Telegram channels are dedicated to fraud and other illicit activity. FBI Birmingham is currently investigating a Telegram channel called "Work Related Slips," which is dedicated to the sale of stolen or otherwise fraudulent checks. The administrator of the "Work Related Slips" Telegram channel has used the handle "@01ihk1" and "@01ihk." As detailed below, the FBI believes that this handle is associated with **MEKHI DIWONE HARRIS, aka "@01ihk," "@01ihk1," and "Khi."**

During the investigation, I have observed the administrator post thousands of stolen or fraudulent checks on the "Work Related Slips" Telegram channel. The victims include individuals, municipalities, utilities, churches, nursing homes, schools, non-profit groups, and businesses across the country — including hundreds in the Northern District of Alabama. I have calculated that the total value of the checks posted to the "Work Related Slips" Telegram channel between October 22, 2022, and August 8, 2023, is more than \$15.1 million.

As set forth in Figures 1 and 2 below, the Telegram administrator "@01ihk" or "@01ihk" takes photographs of stolen checks and posts redacted copies on the

Telegram channel to market them for sale. In doing so, he uses the peer-to-peer payment application Cash App and cryptocurrency transactions as the primary methods for payment for the channel. Individuals who are interested in purchasing these stolen or fraudulent checks can send the administrator a private message and arrange to have a check sent to an address of their choosing.

Figure 1 and 2



HARRIS has been linked to the “Work Related Slips” Telegram channel through various means. These include, among other things, his Cash App account, text message communications, travel records, and social media records. **HARRIS** has also been observed purchasing items used to manufacture counterfeit checks.

Cash App is a mobile payment service that is owned by Block, Inc. The service allows users to transfer money to one another using a mobile phone app. When Cash App customers order a debit card, buy or sell Bitcoin (“BTC”), or invest in stocks using their account, they are asked to verify their identity. This verification process requires the customer to be over 18 years old and to provide Cash App with their Social Security Number and date of birth. Cash App customers may also be asked to take a selfie and a photo of their driver’s license or state identification card.

According to Block, **HARRIS**’ Cash App account was verified on October 22, 2021. At that time, **HARRIS** appears to have provided the name “Mekhi Harris,” as well as his Social Security Number and date of birth. He also provided a photograph of the front and back of his Alabama driver’s license.

Based on my review of records from Block, I know that the transaction history for the account contains descriptions of transactions that appear to reflect the purchase of stolen or fraudulent checks. These include descriptions that reference “GRAMZ & scams,” “slips,” and “food.” Based on my training and experience, as well as my familiarity with the facts of this investigation, I believe that these are references to stolen checks. Notably, the Telegram channel that the FBI is investigating is called “Work Related Slips” and posts by the administrator on the Telegram channel say to message him for “food.” *See* Figure 1.

As detailed below, I also know from my review that identifiers associated with the Cash App account are consistent with those used by the administrator of the “Work Related Slips” Telegram account. These include one of the account’s display names, “Work Related,” and one of its Cashtags, “workrelated1.”

Based on my training and experience, I know that Block keeps records relating to a Cash App user’s display name history. The display name is set by the user and appears on the customer’s peer-to-peer transaction history and third-party transaction records. The display name for **HARRIS**’ account was initially set as “Mekhi Harris,” but it has been changed over time. He first changed it to “Sp Khi,” then “Work Related,” before changing it to “Z Z,” then “Joshua Ellington.”

Based on my training and experience, I also know that Block keeps records pertaining to a Cash App user’s alias history. This includes a historic record of email addresses, SMS numbers, and Cashtags — a distinct account identifier used by Cash App. In October 2021, at the time the Cash App account was created, the Cashtag was “Sppkhi.” According to Block, the accountholder changed the Cashtag from “Sppkhi” to “workrelated1” in April 2022.

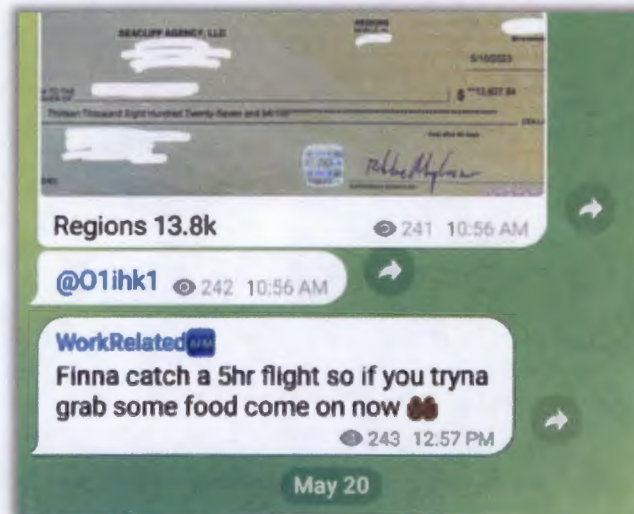
On October 22, 2022, at approximately 11:24 a.m., the administrator of the “Work Related Slips” Telegram channel sent a message stating, “PSA For Future Uploads im doing BTC Only Cashapp Closed my shit so its really no choice Fr [emoji].” Based on my review of **HARRIS**’ Cash App account, I know that his Cash App account was blacklisted around this time and **HARRIS** withdrew more than \$20,000 from the account. At times, the account balance exceed \$100,000.

HARRIS has also been linked to the sale of stolen checks through text message communications. Based on information I obtained from the U.S. Postal Service Office of Inspector General, I know that **HARRIS** communicated with a co-conspirator about the sale of “slips” in May and June 2023. For example, on May 14, 2023, a phone number associated with **HARRIS** and saved as “Khi” texted the

co-conspirator, “the highest slip wasn’t nun but like 9k and people bought the highest shit rigjt under that so far so we may not walk away wit hell pape this upload but its cool cause its still profit.” Less than a week later, on May 19, 2023, he wrote, “I been busy gettung ready for this trip im gone post the rest later tho.”

Travel records for **HARRIS** from that date further tie him to the “Work Related Slips” channel. On or about May 19, 2023, the administrator posted on the “Work Related Slips” Telegram channel, writing, “Finna catch a 5hr flight so if you tryna grab some food come on now.” See Figure 3. According to records from Delta, **HARRIS** flew from Hartsfield–Jackson Atlanta International Airport to Los Angeles International Airport that same day. Based on open-source research, I know that a flight from Atlanta to Los Angeles is approximately four hours and thirty-five minutes, which roughly corresponds to the post about a “5hr flight.” This trip also corresponds with posts on the “Work Related Slips” Telegram channel containing checks that appear to have originated in California.

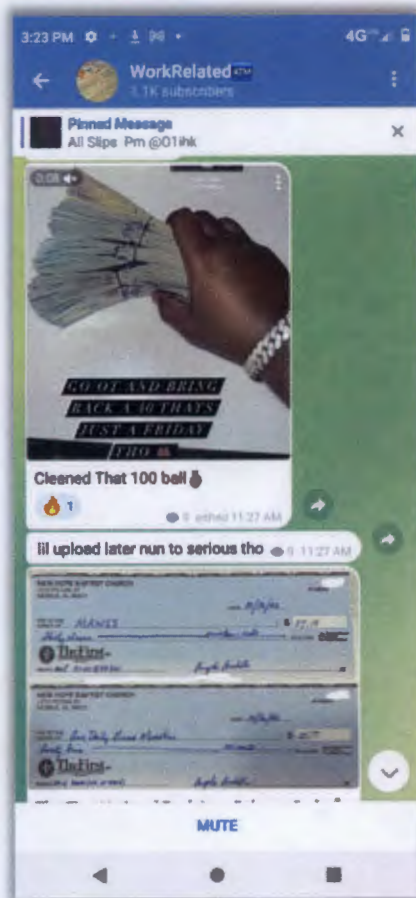
Figure 3



Photographs that the administrator has posted to the “Work Related Slips” Telegram channel also appear to depict jewelry that **HARRIS** has been pictured with on social media. On or about October 22, 2022, the administrator of the “Work Related Slips” channel posted a photograph of an individual’s right hand holding a stack of U.S. currency with the message “Cleaned That 100 ball [emoji].” See Figure 4. There is a unique bracelet around the individual’s right wrist. A similar bracelet appears in photographs on **HARRIS**’ now-deleted Instagram account. See Figure 5. An undated photograph of **HARRIS**’ wearing a chain with his name “Khi” appears

to depict him with the same bracelet around his right wrist. As noted above, **HARRIS** deleted this Instagram account during the course of the investigation.

Figure 4 and Figure 5



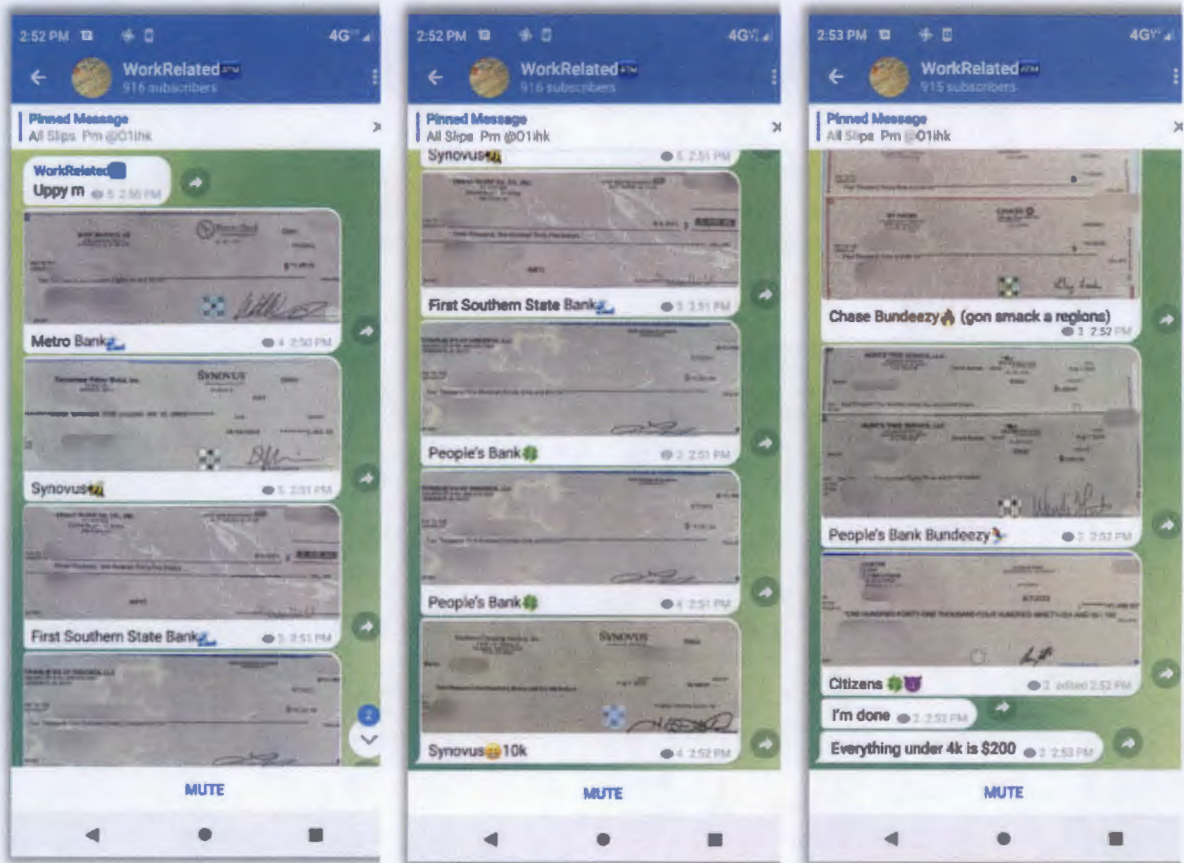
In addition, based on records from Amazon, I also know that, from at least June 2021 through at least August 2022 **HARRIS** used his Amazon account to purchase products (or attempt to purchase products) that can be used to produce counterfeit checks. These include bank-check compliant ink cartridges and toner, business check stock, counterfeit check testers, and check readers.

Finally, **HARRIS** has taken steps to relocate the scheme to another jurisdiction. On July 21, 2023, I observed **HARRIS** and others removing boxes from his apartment in the Lakeview District of Birmingham, Alabama and loading them into a moving truck. On July 24, 2023, I observed workers loading two vehicles associated with **HARRIS** and one vehicle associated with his girlfriend onto a car transport vehicle. **HARRIS** then drove to Houston, Texas. I have observed the

administrator of the “Work Related Slips” Telegram channel uploading checks on four occasions since **HARRIS** relocated to Texas.

As of today, the Telegram channel remains operational. On August 8, 2023, at approximately 2:50 p.m., I observed @01ihk post thirteen checks totaling approximately \$189,577.00 to the “Work Related Slips” Telegram channel. Screenshots of those checks are depicted below in Figures 6 through 8.

Figure 6 through 8



Based on the foregoing, your Affiant submits that there is probable cause to believe that **MEKHI DIWONE HARRIS**, aka “@01ihk,” “@01ihk1,” and “**Khi**,” with others known and unknown, has conspired to commit bank fraud in violation of 18 U.S.C. §§ 1349 and 1344 in the Northern District of Alabama and elsewhere.

Megan Grose Digitally signed by Megan Grose
Date: 2023.08.08 20:01:19 -05'00'

MEGAN GROSE
Federal Bureau of Investigation

Sworn telephonically and subscribed remotely
on August 8, 2023.



GRAY M. BORDEN
United States Magistrate Judge