

UNITED STATES DISTRICT COURT
for the
Eastern District of Wisconsin

United States of America
v.
KEVIN McCAA (D.O.B. XX/XX/1986)
CHARLES DUCKSWORTH, JR. (D.O.B.
XX/XX/1996)
SHANELLE McCOY (D.O.B. XX/XX/1988)

Case No. 22 MJ 227

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 December 12 - December 27, 2022 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Rows include 18 U.S.C. 1111, 1114, and 2(a) - Murder of a USPS Letter Carrier; 18 U.S.C. 924(c) and 2(a) - Discharge of a Firearm During a Crime of Violence; 18 U.S.C. 922(g)(1) and 924(a)(8) - Felon in Possession of Ammo; 21 U.S.C. 841(a)(1) and (b)(1)(D) - Possession with Intent to Distribute Marijuana; 18 U.S.C. 924(c) - Possession of Firearm in Furtherance of Drug Trafficking; 18 U.S.C. 4 - Misprision of a Felony; 18 U.S.C. 1001(a)(2) - Provided Material False Statements.

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Digitally signed by
Tyler Fink
Date: 2022.12.28
11:25:50 -06'00'

Complainant's signature

Inspector Tyler Fink, USPIS

Printed name and title

Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1

Date: 12/28/2022

Handwritten signature of William E. Duffin

Judge's signature

City and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

## **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Tyler Fink, being first duly sworn on oath, on information and belief state:

### **I. BACKGROUND, TRAINING, AND EXPERIENCE:**

1. I am a United States Postal Inspector, assigned to the United States Postal Inspection Service (“USPIS”) Domicile in Milwaukee, Wisconsin as well as being placed on the High Intensity Drug Trafficking Area (“HIDTA”) Interdiction Task Force. I have been employed as a full-time law enforcement officer since 2014.

2. As part of my duties as a USPIS Postal Inspector, I investigate criminal violations of federal law, including violent crimes committed against United States Postal employees and the trafficking of illicit drugs through the U.S. mail. I have intercepted numerous parcels, which were found to contain narcotics or proceeds of narcotics trafficking and have participated in the execution of several arrests and search warrants.

3. The USPIS is the primary investigative arm of the United States Postal Service (“USPS”) and is charged under Title 18, United States Code, Section 3061 with the enforcement of laws governing the use and movement of the United States Mail, including the misuse and fraudulent schemes involving the mail, crimes relating to mail fraud, narcotics trafficking, identity theft involving the United States Mail, and crimes of violence committed against USPS employees.

4. I have investigated numerous violent crime and drug trafficking investigations during my law enforcement experience and received continual training in that and other fields. I have participated in numerous complex narcotics investigations which involved violations of state and federal controlled substances laws including Title 21, United States Code, Sections 841(a)(1) and 846 (possession with intent to distribute a controlled substance and conspiracy to possess with intent to distribute a controlled substance), and other related offenses. I have had

both formal training and have participated in numerous complex drug trafficking investigations, including ones using wiretaps.

5. I have been assigned to the USPIS's Milwaukee multifunction team charged with investigating violations of federal law, including robberies, burglaries, assaults, homicides, and other violent crime matters. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, cellular telephone extractions, vehicle processing, interviews, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

6. Based on my training and experience and the investigation to date, I believe there is probable cause that Kevin McCaa ("McCaa") (DOB XX/XX/1986) and Charles Ducksworth Jr. ("Ducksworth") (DOB XX/XX/1996) committed the following crimes on or about December 9, 2022, in the Eastern District of Wisconsin: Murder of a USPS Letter Carrier, in violation of Title 18, United States Code, Sections 1111, 1114, and 2(a); and Discharge of a Firearm during a Crime of Violence, in violation of Title 18, United States Code, Sections 924(c) and 2(a). In addition, there is probable cause to believe that on or about December 12, 2022, Shanelle McCoy ("McCoy") (DOB XX/XX/1988) committed Misprision of a Felony, in violation of Title 18, United State Code, Section 4; and Provided Material False Statements, in violation of Title 18, United States Code, Section 1001(a)(2). There is also probable cause to believe that on or about December 27, 2022, Ducksworth Jr. possessed marijuana with the intent to distribute it, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and possession of a firearm during and in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c). Finally, there is probable cause to believe that on or about

December 27, 2022, McCaa possessed ammunition knowing he had previously been convicted of a felony, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8). I submit this affidavit in support of a criminal complaint and arrest warrants for McCaa, Ducksworth Jr., and McCoy.

7. This affidavit is based upon my personal knowledge, training, and experience, and on information reported to me by other federal, state, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. This affidavit is also based upon police reports, official records, witness statements, recorded statements, surveillance video, and public records which I consider to be reliable as set forth herein.

8. Because this affidavit is submitted for the limited purpose of a criminal complaint and arrest warrants, I have not included each and every fact known to me concerning this investigation. I have attempted to set forth only the facts that I believe are pertinent to establishing the necessary foundation for the complaint.

## **II. PROBABLE CAUSE**

9. The USPIS, the Milwaukee Police Department (“MPD”), and the Federal Bureau of Investigation (“FBI”) are currently investigating the homicide of a USPS letter carrier (the “Victim”) (“Subject Offense”), which occurred on December 9, 2022, at approximately 4:38 p.m., at 5029 North 65th Street, in Milwaukee, Wisconsin (“Subject Location”), while the Victim was delivering mail. Around that date and time, the Victim sustained a fatal injury as a result of a single gunshot to the head.

10. Based on the investigation to date, which includes a review of surveillance footage from the area of the Subject Location around the time of the shooting, law enforcement believes that the occupants of a silver-colored Audi Q5 SUV vehicle, based on initial

surveillance video believed to be a 2008-2012 model, with tinted windows and no visible front or rear license plates, were involved in the shooting.

11. Law enforcement obtained and reviewed video surveillance footage from multiple residential surveillance cameras in the vicinity of the shooting. At approximately 3:35 p.m., video footage obtained from a residence located on the 6400 block of West Stark Street showed the silver Audi Q5 SUV vehicle traveling eastbound on West Stark Street from the direction of the 6500 block of West Stark Street and subsequently turning northbound on the 4900 block of North 64th Street out of view. At approximately 3:38 p.m., the video footage further showed the silver Audi Q5 SUV vehicle traveling southbound on the 4900 block of North 65th Street and proceed to park in the area of approximately 4901 North 65th Street, where it remained stationary. At approximately 3:51 p.m., the video footage showed the silver Audi Q5 SUV vehicle pull off traveling southbound on North 65th Street and subsequently turn westbound onto West Stark Street before appearing to turn northbound onto North 66th Street out of view. At approximately 3:55 p.m., the video footage showed the silver Audi Q5 SUV vehicle traveling eastbound on West Stark Street before turning southbound on the 4800 block of North 65th Street out of camera view.

12. At approximately 3:57 p.m., video footage obtained from the residence located on the 6400 block of West Stark Street showed the USPS delivery vehicle, driven by the Victim, travel northbound on the 4800 block of North 65th Street and park in front of the residence on the southeast intersection of North 65th Street and West Stark Street. At approximately 4:00 p.m., while the Victim is shown appearing to retrieve mail from the rear of the USPS delivery vehicle, video footage further showed the silver Audi Q5 SUV vehicle traveling southbound on the 4900 block of North 65th Street and turning westbound at the intersection with West Stark Street, which is across the intersection from the location of the Victim.

13. At approximately 4:02 p.m., video footage obtained from a residence located on the 5000 block of North 65th Street showed the silver Audi Q5 SUV vehicle traveling southbound in the alley on the same block between North 65th Street and North 64th Street. Video footage obtained from a residence located further south on the 5000 block of North 65th Street showed the silver Audi Q5 SUV vehicle continuing to travel further southbound in the alley and briefly pausing near the yard area between 5018 North 65th Street and 5026 North 65th Street, located across the street from the Subject Location, before continuing southbound out of view.

14. At approximately 4:02 p.m., video footage obtained from the residence located on the 6400 block of West Stark Street showed the silver Audi Q5 SUV vehicle exit the alley, travel eastbound on West Stark Street, and turn northbound onto the 4900 block of North 64th Street out of view.

15. At approximately 4:15 p.m., video footage obtained from the residence located on the 6400 block of West Stark Street showed the Victim returning to the USPS delivery vehicle parked near the southeast intersection of North 65th Street and West Stark Street, and the Victim entered the driver's seat and then appeared to retrieve mail out of the rear of the vehicle. At approximately 4:17 p.m., the Victim is shown walking away from the USPS delivery vehicle in the direction of the intersection of North 65th Street and West Stark Street out of view. At approximately 4:23 p.m., the silver Audi Q5 SUV vehicle is shown traveling southbound on the 4900 block of North 64th Street, turning westbound on West Stark Street, and then turning northbound into the alley located between North 65th Street and North 64th Street out of view.

16. At approximately 4:27 p.m., video footage obtained from the residence located on the 6400 block of West Stark Street showed the Victim returning to the USPS delivery vehicle, which then departs traveling northbound onto the 4900 block of North 65th Street out of view at

approximately 4:28 p.m. At approximately 4:29 p.m., video footage obtained from a residence located on the 5000 block of North 65th Street showed the USPS delivery vehicle, driven by the Victim, travel northbound onto the block and park in front of the area of approximately 5050 North 65th Street.

17. In summary, beginning by at least 4:00 p.m. and continuing until 4:38 p.m., the time of homicide, the surveillance footage collected reflects that the suspects in the Target Vehicle were conducting surveillance on the Victim while he conducted his letter carrier duties.

18. At approximately 4:37 p.m., surveillance video footage obtained from a residence located on the 5000 block of North 65th Street, located across the street from the Subject Location, showed the silver Audi Q5 SUV vehicle parked facing northbound in the alley between North 65th Street and North 64th Street, between approximately 5018 North 65th Street and 5026 North 65th Street. At approximately 4:38 p.m., an individual (“Suspect A”) is shown walking from the area of the silver Audi Q5 SUV vehicle westbound through a yard in the direction of the Subject Location.

19. At approximately 4:38 p.m., video footage obtained from a residence located on the 5000 block of North 65th Street showed the Victim approaching the Subject Location while an individual, similar in appearance to Suspect A, walking from the direction of the silver Audi Q5 SUV vehicle, and standing across the street from the Subject Location. Suspect A then crossed the street and approached the Victim from behind, at which point a gunshot can be heard on the footage. Suspect A then proceeded to run across the street through the same yard in the direction of the silver Audi Q5 SUV vehicle. At approximately 4:38 p.m., after the audio of the gunshot, Suspect A is shown running to the direction of and approaching the rear passenger area of the silver Audi Q5 SUV vehicle. The video footage subsequently showed the silver Audi Q5

SUV vehicle traveling northbound in the alley between North 65th Street and North 64th Street at high rate of speed.

20. At approximately 4:40 p.m., surveillance video footage obtained from a gas station located at the intersection of North 60th Street and West Villard Avenue showed the silver Audi Q5 SUV vehicle traveling eastbound on West Villard Avenue and further turning southbound on North 60th Street out of view.

21. Surveillance video footage obtained from a residence located on the 5800 block of West Parkway Drive further showed the silver Audi Q5 SUV vehicle traveling southbound on North 60th Street before turning southeast on West Parkway Drive and continuing out of view. At approximately 4:42 p.m., surveillance video footage obtained from a residence located on the 4500 block of North 50th Street showed silver Audi Q5 SUV vehicle traveling southeast on West Parkway Drive and continuing out of view. Surveillance video footage obtained from a residence located on the 4400 North block of 48th Street showed the silver Audi Q5 SUV vehicle continuing to travel southeast on West Parkway Drive and stop in the area of a pedestrian bridge located on the southside of West Parkway Drive near the intersection with North 49th Street. An individual is observed walking from the area of the silver Audi Q5 SUV vehicle on foot in the direction of the pedestrian bridge over a creek and continuing out of view. The historical phone record data for Subject Phone 5 (414-317-3766), further described below, had records consistent with the vehicle and person observed in the area of the footbridge around the times noted above. As discussed in further detail below, a firearm was recovered from the creek on December 19, 2022. The silver Audi Q5 SUV vehicle later is shown further traveling southeast on West Parkway Drive and turning northbound on North 48th Street continuing out of view. At approximately 4:43 p.m., surveillance video footage obtained from a residence located on 4500



block of North 46th Street showed the silver Audi Q5 SUV vehicle traveling eastbound on West Glendale Avenue.

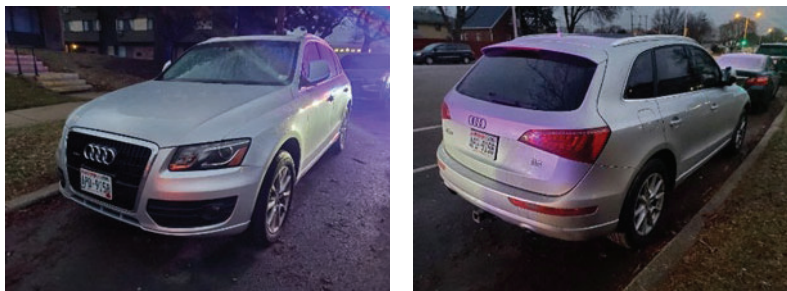
22. On December 9, 2022, at about 4:49 p.m., the silver Audi Q5 SUV vehicle is seen pulling into the parking lot at the Boost Mobile store located at 4616 W. Hampton Avenue in Milwaukee. The driver drops off the front seat passenger, who goes inside the store for about 10 minutes. The driver of the Audi parks in the parking lot. Surveillance video from a neighboring business shows that the driver of the Audi is wearing clothing consistent with Suspect A, the shooter of the Victim. The Audi did not have license plates on it at this time.

23. At about 7:22 p.m. the night of the murder, the silver Audi Q5 SUV vehicle is seen pulling into a gas station at 13<sup>th</sup> Street and Layton on the south side of Milwaukee, now with license plates affixed to it. At that point, the license plates were in reverse placement, meaning the license plate with the registration sticker was affixed to the front of the car. McCaa is seen exiting the driver's seat of the Audi. He goes inside the gas station, comes back outside, briefly talks to someone sitting in the front passenger seat of the Audi, and then goes back into the gas station. Location data for McCaa's phone (Subject Phone 3) shows records consistent with the phone traveling down to the area of S. 13<sup>th</sup> and Layton around the above time and then back to the north side of Milwaukee. Additionally, Subject Phone 5, described below and recovered next to Ducksworth Jr. when he was arrested, also had records consistent with travel from the north side of Milwaukee to the area of S. 13<sup>th</sup> and Layton, around the above time, on December 9, 2022, and then back to the north side of Milwaukee. The cellular records are consistent with the video surveillance obtained.

24. On Monday, December 12, 2022, at approximately 7:19 a.m., officers identified a silver-colored 2009 Audi Q5 SUV vehicle with WI Plate APD-9158 ("Target Vehicle") parked on the street in front of the approximate area of 8517 West Grantosa Drive, in Milwaukee,

Wisconsin (hereinafter “GRANTOSA”), the registered address for the Target Vehicle. The appearance of the Target Vehicle matched all the characteristics of the silver-colored Audi Q5 vehicle involved with the homicide, including the design of the wheels, the slightly darker looking front wheel rims, the front grill and fog lamps, and the license plate areas. Law enforcement officers reviewed both an Automatic License Plate Reader (ALPR) database and FLOCK images of the Target Vehicle. The information in those databases reflects that in the days prior to the homicide, the Target Vehicle traveled in the Milwaukee area with the front and rear license plates in the correct placement. These databases indicated that the rear license plate of the Target Vehicle had the registration sticker properly placed on the rear license plate of the vehicle from multiple images on November 28, 2022, December 8, 2022, and December 9, 2022, at approximately 12:45 a.m. and 1:12 a.m. Additionally, on December 9, 2022, at approximately 12:45 a.m. and 1:12 a.m., an ALPR camera took photos of the front of the Target Vehicle’s front license plate showing that a license plate with no registration sticker was properly attached to the front of the Target Vehicle.

25. When MPD officers located the Target Vehicle on December 12, 2022, the license plate with the registration sticker was affixed to the front of the vehicle. The front and rear license plates appeared to be reversed. Further investigation revealed the registered owner of the Target Vehicle was Shanelle M. McCoy (XX/XX/1988) at GRANTOSA. Wisconsin Department of Transportation records list this as McCoy’s residence.





*Target Vehicle at GRANTOSA on December 12, 2022*

26. On December 12, 2022, Shanelle M. McCoy (McCoy) was interviewed outside her residence. In summary, McCoy stated she was in possession of the Target Vehicle for the entire day of the Subject Offense (December 9, 2022) and that she drove the Target Vehicle while making deliveries for DoorDash. McCoy, using a cellular phone, presented the interviewing officers with her DoorDash logs for December 9, 2022, which indicated she first logged in at approximately 12:03 a.m. and last logged out at approximately 10:55 p.m.

27. McCoy initially provided consent for law enforcement to search the Target Vehicle, but then subsequently rescinded the consent. McCoy had no explanation as to how, why, or when her registration plates were switched. The Target Vehicle was towed to the City of Milwaukee Tow Lot for processing including the collection of possible fingerprints and DNA and for the examination of the vehicles “infotainment” system. Prior to departing, McCoy provided MPD officers with her telephone number, Subject Phone 2, (414) 399-9757.

28. On December 18, 2022, at approximately 12:05 a.m., McCoy contacted the MPD to inquire about the status of the Target Vehicle using Subject Phone #2. Later on December 18, 2022, at approximately 2:57 p.m., MPD officers contacted McCoy at Subject Phone 2, (414) 399-9757, to update her on the status of the Target Vehicle. Surveillance footage obtained over the course of the investigation indicates McCoy was not driving the Target Vehicle between

approximately 4:20 p.m. and approximately 7:59 p.m. on the day of the Subject Offense. Instead, the surveillance footage shows that McCoy was driving a silver 2006 Acura RL sedan bearing license plate APT7045 (VIN JH4KB165X6C002775) during the time of the Subject Offense. Investigation revealed the silver 2006 Acura RL is registered to Charles Ducksworth, Jr. with a listed address of 4725 North 39<sup>th</sup> Street, Milwaukee, Wisconsin. On December 19, 2022, law enforcement observed the Acura parked directly in front of 1817 N. 13<sup>th</sup> Street, in Milwaukee, Wisconsin, the listed address for Ducksworth Jr.'s child's mother.

29. According to surveillance footage, McCoy, at some point, began resuming use of the Target Vehicle for DoorDash deliveries, including one at 4101 North 76<sup>th</sup> Street, Milwaukee, Wisconsin, at approximately 10:05 p.m. At that point, the footage shows that the license plates were back on the Target Vehicle, but not properly affixed. The rear license plate with registration stickers was affixed to the front of the vehicle, consistent with how the license plates were affixed when the vehicle was recovered on December 12, 2022.

30. Law enforcement obtained surveillance footage from the 8500 block of West Grantosa Drive. The Target Vehicle was captured in the footage at several points on December 9, 2022. On December 9, 2022, at approximately 2:07 a.m., a female subject, appearing to be McCoy, is seen exiting the driver's seat of the Target Vehicle and walk towards her residence. A male individual exits the front passenger door of the Target Vehicle and walks towards McCoy's residence. The male individual is wearing a top/sweatshirt and dark colored pants, which bear a resemblance to the top/sweatshirt and pants worn by Suspect A at the Subject Offense location on December 9, 2022, and the top/sweatshirt of the driver of the Audi outside the Boost Mobile at 4:49 p.m. on December 9, 2022. The historical phone record data for Subject Phone 1 and Subject Phone 2 was consistent with the phones being in the same area as the Target Vehicle, which is further consistent with the surveillance video described herein.



*Target Vehicle and male individual on December 9, 2022, at 2:07 a.m. outside GRANTOSA.*

31. Surveillance footage obtained from 8500 block of West Grantosa Drive showed the same male individual entering the Target Vehicle on December 9, 2022, at approximately 2:42 p.m. A review of the surveillance footage revealed this male individual, wearing a top/sweatshirt and dark colored pants that bear a resemblance to the top/sweatshirt and pants worn by Suspect A at the Subject Location on December 9, 2022. The male drives the Target Vehicle away and returns, at approximately 2:47 p.m., to the same area it was originally parked. At this time, a female subject who appears to be Shanelle McCoy, exits the front door of her residence located at GRANTOSA. McCoy enters the front passenger seat of the Target Vehicle, and the vehicle is driven away out of view of the surveillance cameras. The historical phone record data for Subject Phone 1 and Subject Phone 2 was consistent with the phones being in the same area as the Target Vehicle which is further reflected in the surveillance footage outside GRANTOSA on December 9, 2022.





*Male individual approaching driver's area of Target Vehicle on December 9, 2022 at 2:42 p.m. outside GRANTOSA*



*McCoy approaching passenger area of Target Vehicle outside GRANTOSA on December 9, 2022, at approximately 2:47 p.m.*



*Surveillance video showing Suspect A on scene of homicide next to Target Vehicle.*

32. On Thursday, December 15, 2022, law enforcement executed a federal search warrant of the Target Vehicle. A latent print obtained from the interior glass sunroof above the driver's seat area of the Target Vehicle was examined and a Latent Print Examiner determined that the source of the print was Kevin McCaa.

33. In May 2022, a traffic case was filed in Jefferson County Circuit Court alleging that Charles Ducksworth Jr. was speeding on May 18, 2022, while operating a vehicle with license plate APT7045, with VIN JH4KB165X6C002775.

### **Recovery of Firearm**

34. On December 19, 2022, at approximately 2:30 p.m., MPD officers were conducting a canvas in the area of the pedestrian bridge located on the southside of West Parkway Drive near the intersection of North 49th Street. MPD Police Officer Jacob Howell located a black Glock 19 Gen 4 9mm semiautomatic handgun, serial number BCRP667, without a magazine, submerged underwater, in the creek to the east of the footbridge leading from Parkway Drive, southwest across the creek. PO Howell seized the Glock handgun and transferred it into the custody of MPD Detective Alex Klabunde. Det. Klabunde transported the firearm to the Wisconsin State Crime Lab for analysis. On December 21, 2022, a Firearms and Toolmarks Analyst at the Crime Lab reported that the recovered Glock firearm was compared to the casing recovered from the scene of the Subject Offense. The Analyst determined that the casing recovered from the scene of the Subject Offense matches the analysis from the Glock firearm that was recovered from the creek.

### **McCaa's and Ducksworth Jr.'s Suspected Involvement in Mailed Narcotics**

35. Following the Subject Offense, Postal Inspectors reviewed USPS business records and identified suspect parcels scanned by the Victim as part of his duties as a USPS letter carrier. One suspect parcel bore tracking number 9405511206223897528809 (Subject Parcel #1) and was addressed to "Larry Ducksworth" at 6414 W. Hampton Avenue, Milwaukee, Wisconsin 53218 (hereinafter "HAMPTON"). A review of a law enforcement database indicated Ducksworth Jr.'s current residence on record is HAMPTON.

36. Postal Inspectors, through their review of USPS business records, linked Subject Parcel #1 to a second suspect parcel bearing tracking number 9405511206223897528892 (Subject Parcel #2) and addressed to "Jay Thompson" at 4538 West Eggert Place in Milwaukee. (hereinafter "4538 EGGERT"). Milwaukee County Circuit Court records list Kevin McCaa's



address as 4532 West Eggert Place, which is next door to the destination address for Subject Parcel #2.

37. According to a review of a law enforcement database, the listed recipient last names for Subject Parcel #1 and Subject Parcel #2 both associate to the respective recipient addresses; however, the listed first names do not associate. Additionally, the listed addresses utilized for the sender information for Subject Parcel #1 and Subject Parcel #2 are both associated with different business locations in Los Angeles, California. Based on my training and experience, fictitious sender or receiver names, and fictitious return addresses, can indicate that the sender or receiver does not want to be associated with drug-laden parcels.

38. According to USPS business records, the mailing labels for Subject Parcel #1 and Subject Parcel #2 were both created at the same date and time: November 30, 2022, at approximately 10:34 p.m. Both Subject Parcel #1 and Subject Parcel #2 share the same weight, postage, parcel dimensions, and origin/destination zip codes. Further, both Subject Parcel #1 and Subject Parcel #2 were mailed from Los Angeles, California, 90012 on November 30, 2022, with their respective postage paid for using cryptocurrency.

39. Based on my training and experience, a sender paying for postage with cryptocurrency may indicate the sender does not want to be associated with the parcel. Additionally, drug-traffickers will routinely mail more than one parcel containing narcotics in an effort to avoid detection. Multiple drug parcels mailed at the same time, likely from the same mailer, are commonly referred to as “sister parcels.” Sister parcels, based on my training and experience, may display many of the same parcel characteristics: including weight, postage, parcel dimensions, shipping labels, and origin/destination areas. California is also a known source-state for illegal drug-trafficking. The Los Angeles High Intensity Drug Trafficking Area

(LA HIDTA) was one of the original five HIDTA regions designated as a “Drug Trafficking Gateway.”

40. According to USPS business records, Subject Parcel #1 was scanned by the Victim on December 2, 2022, at approximately 8:29 p.m. as, “Delivery Attempted – No Access to Delivery Location.” USPS business records indicate the scan occurred in the vicinity of North 77<sup>th</sup> Street and West Carmen Avenue, Milwaukee, Wisconsin, which is approximately one and a half miles away from the delivery address (HAMPTON). Following the Subject Offense, Postal Inspectors visited the Victim’s assigned USPS post office and were unable to locate Subject Parcel #1. Based on my training and experience, Subject Parcel #1 being scanned as “Delivery Attempted – No Access to Delivery Location,” combined with evidence it was not returned to its original USPS delivery unit, could indicate that a USPS employee retained the parcel or provided it to someone else outside of normal operations.

41. On December 3, 2022, USPS business records indicate that the tracking number for Subject Parcel #1 was queried on USPS.com and a customer requested Short Message Service (SMS) text delivery notifications for the parcel be sent to telephone number (262) 683-2033 (Subject Phone 4). Subscriber information obtained from T-Mobile revealed Subject Phone 4 is subscribed to V.T. I am aware that V.T. is Ducksworth Jr.’s grandmother.

42. Your affiant further knows that a package label was created in California on November 30, 2022, related to a package in the investigation. Historical call detail records for the phone number 262-683-2033 (Subject Phone 4) show the phone in California on or about November 29, 2022.

43. Also on December 3, 2022, USPS business records indicate that the tracking number for Subject Parcel #2 was queried on USPS.com and a customer requested Short Message Service (SMS) text delivery notifications for the parcel be sent to Subject Phone 1,

(414) 975-4685. Subscriber information obtained from T-Mobile revealed Subject Phone 1 is subscribed to Kevin McCaa.

**Parcels from California sent to 4538 EGGERT  
and HAMPTON addresses**

44. A review of USPS business records indicated 4538 W Eggert Place, Milwaukee, WI (4538 EGGERT) has received an additional four suspicious parcels outside of Subject Parcel #2. These same records indicated all five of these suspected drug laden parcels were shipped between July 12, 2022, and December 1, 2022, the postage was paid for by Stamps.com, and they were all postmarked from the Los Angeles, California area. Based on my training and experience, I know that Stamps.com is a third-party postage service which is often utilized by individuals in the trafficking of illicit drugs who often take advantage of the enhanced anonymity. The payment method used for the additional four parcels is unknown. The weights of the five parcels ranged from approximately three to eight pounds. These records showed the shipping label for one of these suspected drug laden parcels had a sender's address of 9XX Maple Avenue, Los Angeles California, 90015. On September 24, 2021, a Postal Inspector in another state searched and seized another parcel with the same sender address. The search revealed that the parcel contained approximately 2,267 grams of suspected crystal methamphetamine.

45. A review of USPS business records indicated 6414 W. Hampton Avenue, Milwaukee, WI 53218 (HAMPTON) has received an additional seven suspicious parcels outside of Subject Parcel #1. The same records indicated these suspected drug laden parcels were shipped between August 9, 2022, and November 30, 2022, and were all postmarked from the Los Angeles, California, area. The postage for seven of these eight parcels were paid for by Stamps.com, a third-party postage service, using cryptocurrency. Based on my training and

experience and on information provided by reliable law enforcement sources, I know that individuals involved in the trafficking of illicit drugs often take advantage of the anonymity of enhanced cryptocurrency and third-party postage services. The USPS records were not available to show the payment method used on the eighth parcel. It is unknown how postage was paid. The weights of the eight parcels ranged from approximately four to nine pounds. Seven of these eight suspicious parcels had the recipient's name as either "Lamar Duckworth" or "Larry Duckworth." A review of a law enforcement database indicated neither Lamar Duckworth or Larry Duckworth currently lives, or has lived, at this destination address.

46. In my training and experience, I know that drug traffickers will often use fictitious names and/or addresses as well as incomplete names and addresses in an attempt to hide their trafficking efforts from law enforcement. The approximate weights, reviewable payment methods, and postmark vicinity are the same as all of the suspected drug laden parcels shipped to 4538 EGGERT. From my training and experience, drug traffickers will often package drug laden USPS parcels in a similar manner, ship them from various post offices in the same vicinity, and ship their parcels to various addresses associated with their customers in Milwaukee, Wisconsin. They do this in an attempt to avoid detection by law enforcement.

47. Based on my training and experience, I am aware California is a source area for controlled substances. As such, controlled substances are frequently transported from California via the USPS, and the proceeds from the sale of the controlled substances are frequently returned to California via the USPS and/or other means. These proceeds are generally in large amounts of money, oftentimes over \$1000.

48. Based on my training and experience, I know that drug traffickers often use enhanced cryptocurrency, such as Bitcoin, to protect their identities. Bitcoin is a decentralized digital currency without a central bank or single administrator. Payments are sent from user-to-

user on the peer-to-peer bitcoin network without the need for intermediaries. Drug traffickers often use third-party postage services, such as Stamps.com, to add additional layers of anonymity to their transactions. These services allow their customers to purchase postage using cryptocurrency.

**McCaa’s Telephone Calls on Date of Subject Offense (December 9, 2022)**

49. According to T-Mobile, telephone numbers 414-975-4685 (Subject Phone 1) and 414-839-2869 (Subject Phone 3), which are both subscribed to McCaa, conducted thirteen total telephone contacts with McCoy, Subject Phone 2, (414) 399-9757, on the day of the Subject Offense:

Call #	Subject Phone #	Date	Approximate Time	Incoming/Outgoing
1	414-975-4685	12/09/22	1:32 a.m.	Outgoing
2	414-975-4685	12/09/22	1:33 a.m.	Outgoing
3	414-975-4685	12/09/22	2:45 p.m.	Incoming
4	414-975-4685	12/09/22	3:28 p.m.	Outgoing
5	414-975-4685	12/09/22	3:42 p.m.	Incoming
<b>Subject Offense: 12/09/22 @ 4:38 p.m.</b>				
6	414-839-2869	12/09/22	4:59 p.m.	Outgoing
7	414-839-2869	12/09/22	6:48 p.m.	Outgoing
8	414-839-2869	12/09/22	6:56 p.m.	Incoming
9	414-839-2869	12/09/22	7:38 p.m.	Outgoing
10	414-839-2869	12/09/22	7:42 p.m.	Incoming
11	414-839-2869	12/09/22	8:47 p.m.	Incoming

12	414-839-2869	12/09/22	8:59 p.m.	Outgoing
13	414-839-2869	12/09/22	11:20 p.m.	Incoming

50. Toll records for Subject Phone 1, (414-975-4685), were obtained from T-Mobile for telephone calls made between November 14, 2022, and December 15, 2022. According to T-Mobile, the last telephone call on December 9, 2022, the day of the Subject Offense, was received from McCoy, Subject Phone 2, (414) 399-9757, at approximately 3:42 p.m. Through at least December 15, 2022, the T-Mobile records indicate Subject Phone 1 made no additional telephone calls.

51. Toll records for Subject Phone 3, (414-839-2869), were obtained from T-Mobile for telephone calls made between November 14, 2022, and December 15, 2022. According to T-Mobile, between November 14, 2022, and December 15, 2022, the first telephone call made by Subject Phone 3 was to McCoy, Subject Phone 2, (414) 399-9757, on December 9, 2022, at approximately 4:59 p.m.

52. Also, according to T-Mobile, Subject Phone 1 conducted eight telephone contacts with Subject Phone 4, (262) 683-2033, which USPS business records indicate was used to track Subject Parcel #1, on the day of the Subject Offense:

Date	Approximate Time	Incoming/Outgoing
12/09/22	2:38 p.m.	Outgoing
12/09/22	2:40 p.m.	Outgoing
12/09/22	2:48 p.m.	Outgoing
12/09/22	2:49 p.m.	Outgoing
12/09/22	2:51 p.m.	Outgoing

12/09/22	2:56 p.m.	Incoming
12/09/22	3:08 p.m.	Incoming
12/09/22	3:08 p.m.	Incoming

53. T-Mobile records indicate Subject Phone 1 was also in contact with telephone number (262) 683-2033 (Subject Phone 4) on December 2, 2022, December 3, 2022, and on the days leading up to the Subject Offense. As noted herein, the user of Subject Phone 4 is believed to be Charles Ducksworth, Jr.

#### **Electronic Surveillance Records**

54. On December 21, 2022, the Honorable William E. Duffin signed a search warrant for the historical cell site records for four phone numbers. Those records were returned and analyzed. A review of the historical call detail records for the phone number 414-975-4685 (Subject Phone 1) reflected that the number was changed on December 9, 2022, to the phone number 414-839-2869 (Subject Phone 3). Both phone numbers were subscribed to Kevin McCaa. Prior to the change, the last outgoing call on phone number 414-975-4685 (Subject Phone 1) was to 414-399-9757 (Subject Phone 2, McCoy's Phone) at approximately 3:28 p.m. Additionally, after the device was assigned a new number, the first outgoing call with the new number (Subject Phone 3), was at approximately 4:59 p.m. to the same 414-399-9757 phone number (Subject Phone 2). Furthermore, it was identified that the same cellular device was used when the phone numbers were switched. At some point between 3:28 p.m. and 4:59 p.m. on December 9, 2022, the device's assigned phone number was switched from Subject Phone 1 to Subject Phone 3. The homicide occurred at approximately 4:38 p.m.

55. Furthermore, the location information for both Subject Phone 1 (pre-homicide) and Subject Phone 3 (post-homicide) show cellular activity consistent with the geographic areas around the known locations based upon surveillance footage obtained, as detailed above.

56. Pre-homicide, the historical records for phone number 414-975-4685 (Subject Phone 1), believed to be used by McCaa, showed records that were consistent with the the phone being in the geographic area of GRANTOSA when the Target Vehicle and male individual wearing clothing similar to the shooter/Suspect A were observed outside GRANTOSA on December 9, 2022, at approximately 2:07 a.m. and 2:47 p.m.

57. At approximately 3:08 PM, on December 9, 2022, historical phone records for 414-975-4685 (Subject Phone 1) and 262-683-2033 (Subject Phone 4) show the phones were in contact with each other. Subject Phone 1 is believed to be utilized by McCaa. Subject Phone 4 is believed to be utilized by Ducksworth Jr. These same phone records indicated Subject Phone 1, Subject Phone 4, and 414-399-9757 (Subject Phone 2), to all have records consistent with the area of EGGERT after Subject Phone 1 and Subject Phone 4 communicated. Subject Phone 2 is believed to be utilized by McCoy. Additionally, the phone 414-317-3766 (Subject Phone 5) had records consistent with Subject Phone 4 leaving the area of 1817 North 13<sup>th</sup> Street, Milwaukee, WI and traveling north towards the area EGGERT prior to the communication between Subject Phone 1 and Subject Phone 4 at approximately 3:08 PM.

58. At approximately 3:15 PM, historical phone records indicate 262-683-2033 (Subject Phone 4) drops off the cellular network and Subject Phone 5 was still on the network. At approximately 3:32 PM., these same records showed 414-975-4685 (Subject Phone 1) dropped off the network and again Subject Phone 5 was still on the network. These records showed Subject Phone 1 and Subject Phone 5 with records consistent with a similar geographic area around the time Subject Phone 1 dropped off the network.



59. Furthermore, a review of the historical call detail records identified that the phone number 414-839-2869 (Subject Phone 3), believed to be used by McCaa, attempted to place outgoing calls to 262-683-2033 (Subject Phone 4), believed to be used by Ducksworth Jr., on or about December 12, 2022, the day the Audi (Target vehicle) was recovered by law enforcement. The calls were not connected due to the user of phone number 262-683-2033 (Subject Phone 4) cancelling their phone number on December 9, 2022. The last outgoing call on Subject Phone 4 was at approximately 3:08 p.m. on December 9, 2022. That last call placed on Subject Phone 4 was to Subject Phone 1.

60. Review of the records for activity on December 9, 2022, prior to the homicide, show that the phone 262-683-2033 (Subject Phone 4) had records consistent with the geographic area of 1817 N. 13<sup>th</sup> Street, Milwaukee, Wisconsin (hereinafter “NORTH 13<sup>th</sup>”), between approximately 2:00 PM and 2:57 PM, prior to moving to the geographic area consistent with 4532 EGGERT.

61. The historical phone record data for 414-317-3766 (Subject Phone 5) had records between approximately 3:37 PM and 4:39 PM consistent with the geographic area and times of and around the video surveillance detailed above, including the pre-homicide tracking of the Victim and the depositing of the firearm near the footbridge on Parkway Drive.

62. Historical phone record data for Subject Phone 3 and Subject Phone 5 after the time of the homicide is consistent with the phones being in the same area as the Audi Q5 outside the Boost Mobile at 4616 West Hampton Avenue, around 4:49 p.m. on December 9, 2022, which is consistent with the surveillance video.

63. The historical phone record data for McCaa’s phone (Subject Phone 3), Ducksworth Jr.’s phone (Subject Phone 5), and 414-737-3671 (as described below) were

consistent with the three phones being in the area of 4532 EGGERT around 5:15 p.m. on December 9, 2022.

64. As provided above, location data for McCaa's phone (Subject Phone 3) shows records consistent with the phone traveling down to the area of S. 13<sup>th</sup> and Layton before and around 7:22 p.m. and then back to the north side of Milwaukee. Additionally, Subject Phone 5, recovered next to Ducksworth Jr. when he was arrested, also had records consistent with travel from the north side of Milwaukee to the area of S. 13<sup>th</sup> and Layton, before and around 7:22 p.m., on December 9, 2022, and then back to the north side of Milwaukee. The cellular records are consistent with the video surveillance obtained.

65. Additionally, review of the 262-683-2033 (Subject Phone 4) showed that on December 2, 2022, the phone had records consistent with being in the geographic area of 6414 West Hampton, Milwaukee, WI between approximately 6:10 PM – 8:05 PM on December 2, 2022. This was the date that Subject Parcel #1 was expected to be delivered to HAMPTON, but the Victim later marked it "Undeliverable." As discussed above, this was the same number tracking the delivery status of Subject Parcel #1.

66. Based on a previously authorized search warrant to T-Mobile for the IMEI that was associated with 262-683-2033 (Subject Phone 4), T-Mobile identified that the new phone number utilizing that International Mobile Equipment Identity (IMEI) was 414-737-3671. The subscriber information shows that the new phone number was activated on December 9, 2022, with a subscriber name of V.T. (initials) and the International Mobile Subscriber Identity (IMSI) was the same as the previous number (Subject Phone 4). Based on your affiant's conversation with other law enforcement agents, this is consistent with an individual changing their phone number on or about December 9, 2022.

### **Execution of residential search warrants on December 27, 2022**

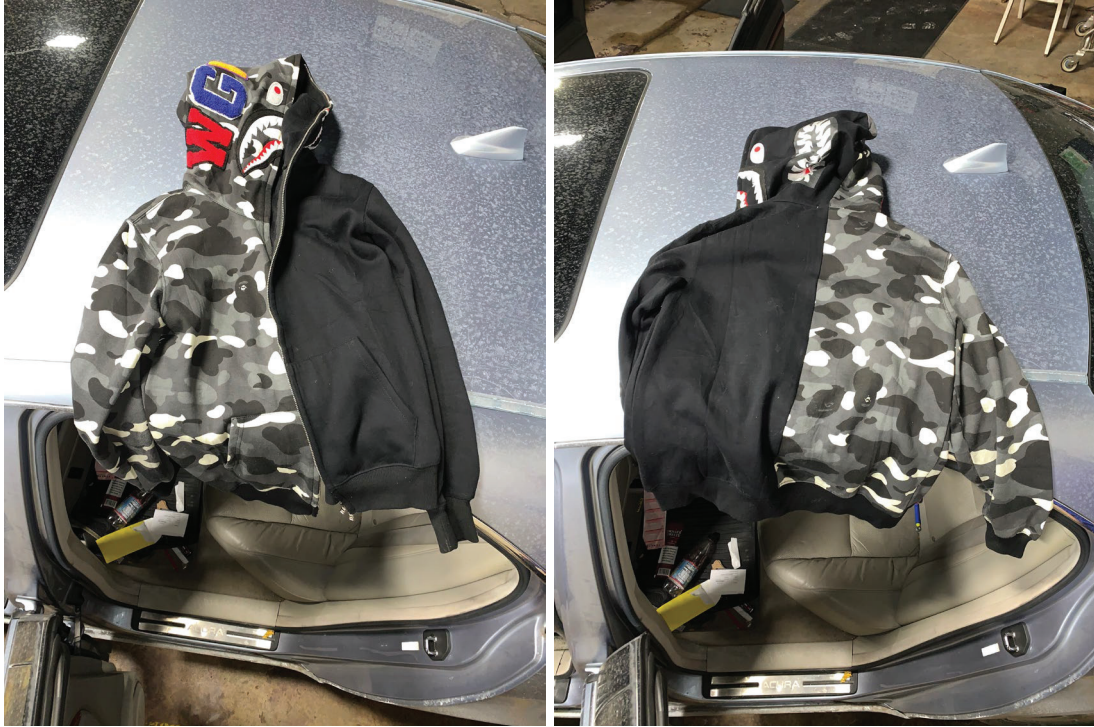
67. On December 27, 2022, law enforcement executed federal search warrants at GRANTOSA, HAMPTON, NORTH 13<sup>TH</sup>, 4532 EGGERT, and 4538 EGGERT.

68. McCaa and McCoy were located at GRANTOSA and arrested. Two Glock magazines were recovered from the living room of GRANTOSA. In addition, several rounds of .40 caliber ammunition were also recovered. McCaa is a convicted felon and prohibited from possessing firearms and ammunition.

69. A search of 4532 EGGERT yielded clothing consistent with the clothing worn by McCaa in the gas station footage 13<sup>th</sup> and Layton around 7:22 p.m. on December 9, 2022, including a black coat with fur hood, Nike Air Force sneakers, and a shiny gold belt.

70. Ducksworth Jr. was arrested at NORTH 13<sup>th</sup> STREET. At this location, officers located a Glock 9mm with a drum magazine, loaded with one round in the chamber, in a kitchen cabinet above the sink. In addition, throughout the residence, officers recovered a large quantity of marijuana packaged in various bags and containers. Based upon my training and experience, the quantity of marijuana recovered was consistent with distribution as opposed to personal use. Finally, officers recovered a flip phone with corresponding phone number 414-317-3766, Subject Phone 5. This phone was downloaded, and officers observed conversations on Subject Phone 5 consistent with the phone being used to aid in their drug trafficking operation.

71. On or about December 27, 2022, the Acura was seized from NORTH 13<sup>th</sup>. A search of the Acura led to the recovery of the sweatshirt consistent in all respects to the top/sweatshirt worn by Suspect A during the homicide. A photograph of the recovered sweatshirt is below:



### III. CONCLUSION

72. Based upon the foregoing, there is probable cause to believe that on or about December 9, 2022, in the State and Eastern District of Wisconsin, Kevin McCaa (“McCaa”) (DOB XX/XX/1986) and Charles Ducksworth Jr. (“Ducksworth”) (DOB XX/XX/1996) committed Murder of a USPS Letter Carrier, in violation of Title 18, United States Code, Sections 1111, 1114, and 2(a); and Discharge of a Firearm during a Crime of Violence, in violation of Title 18, United States Code, Sections 924(c) and 2(a). In addition, there is probable cause to believe that on or about December 12, 2022, Shanelle McCoy (“McCoy”) (DOB XX/XX/1988) committed Misprision of a Felony, in violation of Title 18, United State Code, Section 4, and Provided Material False Statements, in violation of Title 18, United States Code, Section 1001(a)(2). There is further probable cause that on or about December 27, 2022, Ducksworth Jr. possessed marijuana with the intent to distribute it, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(D), and possessed a firearm during and in

furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c). Finally, there is probable cause to believe that on or about December 27, 2022, McCaa possessed ammunition knowing he had previously been convicted of a felony, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8). I submit this affidavit in support of a criminal complaint and arrest warrants for McCaa, Ducksworth Jr., and McCoy.