

UNITED STATES DISTRICT COURT
for the
Eastern District of Louisiana

United States of America
v.
ZANDRA ELLIS
a/k/a Jasmine Brown

Case No.
22-mj-89

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 July 6, 2022 in the parish of Orleans in the Eastern District of Louisiana, the defendant(s) violated:

Table with 2 columns: Code Section (18 U.S.C. § 1958) and Offense Description (using a facility of interstate commerce, to wit: a cellular telephone, with intent that a murder be committed in violation of the laws of any State or the United States as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value)

This criminal complaint is based on these facts:
see attached Affidavit.

Continued on the attached sheet.

s/Michael Heimbach, Jr.
Complainant's signature
Special Agent Michael Heimbach, Jr.
Federal Bureau of Investigation
Printed name and title

Sworn to before me and signed in my presence.

Date: 7/7/22

Dana M. Douglas
Judge's signature

City and state: New Orleans, Louisiana

Honorable Dana M. Douglas, U.S. Magistrate Judge
Printed name and title

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * **NO. 22-mj-89**

v. *

ZANDRA ELLIS, *
a/k/a Jasmine Brown

* * *

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael Heimbach Jr., being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I am currently assigned to the Violent Crime Task Force of the FBI's New Orleans Field Division. I successfully completed the twenty-one (21) weeks of New Agent Training at the FBI Academy in Quantico, Virginia in September 2018. During that time, I received training in physical surveillance, legal statutes and procedures, financial investigations, money laundering techniques, asset identification, forfeiture and seizure, confidential source management, and electronic surveillance techniques, including Title III monitoring.

2. As an FBI Special Agent, I have conducted and participated in investigations of weapons of mass destruction, violent extremist ideologues, organized crime and weapons offenses. During these investigations, I have utilized various types of investigative techniques, including informants, physical surveillance, and the service of Grand Jury subpoenas. I have participated in the execution of numerous federal arrest warrants and search warrants. Prior to my employment with the FBI, I worked for the U.S. Marine Corps.

3. Since this affidavit is submitted only for the limited purpose of securing a Criminal Complaint against **ZANDRA ELLIS, a/k/a Jasmine Brown (ELLIS)**, I have not set forth each and every fact known to me concerning this investigation. I have included what I believe are the facts sufficient to establish probable cause.

4. I submit this affidavit in support of the attached application for a Criminal Complaint charging **ZANDRA ELLIS (ELLIS)** with violating Title 18, United States Code, Section 1958, use of interstate commerce facilities in the commission of murder-for-hire.

PROBABLE CAUSE

5. On July 3, 2022, R.I. called the FBI National Threat Operations Center (NTOC) to report information regarding a murder for hire. R.I. is the webmaster for rentahitman.com. Rentahitman.com is a parody site complete with its own web-based intake form for would-be solicitors to fill out in their own words the who, what, when, where, and why they request services. The site also boasts its own fictitious privacy statement known as HIPPA (Hitman Information Privacy & Protection Act of 1964) which is linked directly to the FBI's Internet Crime Complaint Center (ic3.gov).

6. On June 30, 2022, at approximately 12:47 Pacific Daylight Time (PDT) the website (rentahitman.com) received a service request submission form from a subject tentatively identified as **JASMINE D. BROWN (BROWN)**. **BROWN** voluntarily provided her name, email address, phone number and physical address. Additionally, **BROWN** indicated she wanted to cause harm to a female identified as B.H. **BROWN** voluntarily provided B.H.'s phone number, address, and Instagram account. In the portion of the submission request form captioned "Describe what

services you would like performed,” **BROWN** wrote, “I would like her dead since she is trying to kill me.”

7. At approximately 9:33 PDT, R.I. contacted **BROWN** and asked if she still required the requested services and if she wanted to be placed in contact with a field operative for her free consultation. **BROWN** responded one minute later, “yes.” At approximately 9:44 PDT, R.I. emailed **BROWN** and asked why the name provided on the service request form read “**JASMINE D. BROWN**” but the name associated with email address beautiful8honey@zohomail.com depicted “**ZANDRA ELLIS**.” **BROWN**, actually having the true identity of **ZANDRA ELLIS** replied “I didn’t want my real name out just in case this isn’t real or if it comes back to me or so I wouldn’t go to jail for wanting something like this done. I just didn’t want it to fall back on me.” During the time of the email exchanges **ELLIS** utilized IP Address 68.11.66.31 which is associated with a Cox Communications account in New Orleans, Louisiana.

8. On July 5, 2022, **ELLIS** was contacted via cellular telephone number 504-294-4475 (provided by **ELLIS** to rentahitman.com in her service request) by an FBI Undercover Employee (UCE). The UCE texted cellular telephone number 504-294-4475¹ from cellular telephone number 806-678-1978. The UCE introduced himself as “Ace” and asked **ELLIS** if she was still interested in services that she had inquired about online. **ELLIS** responded, “yes.” **ELLIS** was concerned about the price for services to be rendered. The UCE asked **ELLIS** when she wanted to “make that move.” **ELLIS** responded, “Depends on the price.” As the conversation continued, it was agreed upon by **ELLIS** and the UCE that the price to complete what **ELLIS**

¹ 504-294-4475 is associated with a Text Now account. Text Now is an end-to-end phone service contained inside an app. The app allows free texts and free calls over WiFi, meaning when you're at home – or on a WiFi network – you don't have to pay for calls.

requested online would be a “G.”² The UCE informed **ELLIS** that she would be required to provide ten percent of the payment which would be \$100 dollars. **ELLIS** responded, “ok cool I got the 100 but will need jus a lil time for the rest unless I can do installments lol.” The UCE asked **ELLIS** where she wanted to meet and **ELLIS** replied, “Waffle House on Canal St cool wit u???” The UCE then agreed to the location.

9. On July 6, 2022, at approximately 12:42 PM CST, the UCE sent a text message to **ELLIS** via telephone number (504) 294-4475 and asked **ELLIS** if she was still good to meet later. **ELLIS** replied, “yes.” At approximately 3:44 PM CST, the UCE sent another text message to **ELLIS** to see what time she would arrive at Waffle House. **ELLIS** replied, “I’m getting off now and u stay round the corner from there so im leaving in 5.” The UCE then asked **ELLIS** what she would be wearing. **ELLIS** replied, “Gray shirt black shorts.” At approximately 4:00 PM CST, agents conducting surveillance observed a gray sedan pull into the rear parking lot of Waffle House located at 2500 Canal Street, New Orleans, Louisiana. A black female exited the vehicle clad in a gray shirt and black shorts and later identified as **ELLIS**. **ELLIS** then removed a small child from the vehicle and placed the child into a stroller before entering Waffle House. The UCE, along with an FBI agent dressed in civilian wear, walked into Waffle House shortly thereafter. When **ELLIS** saw the UCE, she greeted him.

10. The UCE asked **ELLIS** to have a seat at the counter located in Waffle House so they could talk. The UCE then asked **ELLIS** to text cellular telephone number (806) 678-1978, which she did ,confirming the use of cellular telephone number (504) 294-4475. The UCE placed a recording device in front of **ELLIS** to capture the interactions along with an additional recording device which was set in place by the FBI agent. **ELLIS** told the UCE and FBI agent that she had

² “G”- commonly referred to in street terminology as meaning \$1,000 dollars.

been feuding with B.H. over social media because the two women had children by the same male who was not identified by name. **ELLIS** maintained that if someone wanted her and her unborn child dead that they had to go.

11. When **ELLIS** was asked if her name was “Jasmine,” she told the UCE that her name was **ZANDRA ELLIS**. **ELLIS** told the UCE that she didn’t want to put her real name online as a precaution when she filled out the form online. The UCE asked **ELLIS** if she brought the money and **ELLIS** told the UCE yes she had it. The UCE asked **ELLIS** for the money, which she provided. The UCE gave to the FBI agent to count, confirming a total of \$100. When the FBI agent asked **ELLIS** how she wanted confirmation that the job was done, **ELLIS** told him that she filled that part out online, but told the agent that a code word would be fine. The UCE asked **ELLIS** when she could have the rest of the money so that the job could get done. **ELLIS** told the UCE that she is paid every two weeks and that she planned to pay him at least \$250 dollars until the debt was paid in full. The UCE asked **ELLIS** if she had something to protect herself. **ELLIS** glanced at her backpack and told the UCE, when you see me with this I’m always strapped. When **ELLIS** exited Waffle House she was arrested and found to be in possession of a Ruger 308 pistol containing live rounds.

CONCLUSION

12. Based on the aforementioned factual information, your Affiant respectfully submits that there is probable cause to believe that on July 6, 2022, **ELLIS** violated the federal statute

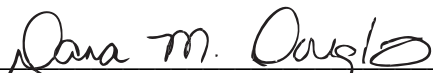
18 U.S.C. § 1958, use of interstate commerce facilities in the commission of murder-for-hire. Your Affiant swears that the above information is true and correct to the best of his knowledge.

Respectfully submitted,

s/Michael Heimbach, Jr.
Special Agent Michael Heimbach, Jr.
Federal Bureau of Investigation

Pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3), the undersigned judicial officer has on this date considered the information communicated by reliable electronic means in considering whether a complaint, warrant, or summons will issue. In doing so, I have placed the affiant under oath, and the affiant has confirmed that the signatures on the complaint, warrant, or summons and affidavit are those of the affiant, that the document received by me is a correct and complete copy of the document submitted by the affiant, and that the information contained in the complaint, warrant, or summons and affidavit is true and correct to the best of the affiant's knowledge.

Subscribed to and sworn before me,
this 7th day of July, 2022,
New Orleans, Louisiana.


Honorable Dana M. Douglas
United States Magistrate Judge

EASTERN DISTRICT OF LOUISIANA

MAG. Number: 22-89 **Complaint/Warrant from Other District**

Defendant: Zandra Ellis a/k/a Jamire D. Brown

Violation: Use of interstate commerce facilities in the
commission of murder for hire
18 USC 1958(a)

U.S. Attorney: Greg Kennedy

Date Assigned: 7/7/2022

Interpreter Needed? Yes **No**

Sealed? Yes **No**

Court Date and Time: 7/8/22 @ 10AM

Before Magistrate Judge: Dana M. Douglas