

FILED

NOV 21 2017

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY *[Signature]*
DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

CHARLES JORDAN

CASE NUMBER: *W17-192M*

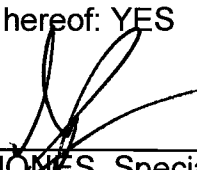
I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

Beginning in or about December 6, 2014, and continuing until at least August 3, 2016, in Bell County, in the Western District of Texas, defendant(s), did unlawfully combine, conspire, confederate, and agree, with others, to transfer, possess, and use, in or affecting interstate or foreign commerce, without lawful authority, means of identification of another person, with the intent to commit, and in connection with, an unlawful activity that constitutes a felony violation under the laws of the State of Texas, to-wit: Fraudulent Use of Identifying Information, Texas Penal Code 32.51, and as a result of the offense, obtained a thing of value aggregating \$1,000 or more during any one year period, in violation of Title 18, United States Code, Section(s) 1028(a)(7), 1028(b)(1)(D), and 1028(f).

I further state that I am a(n) Special Agent, Department of Veterans Affairs, OIG-CID, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

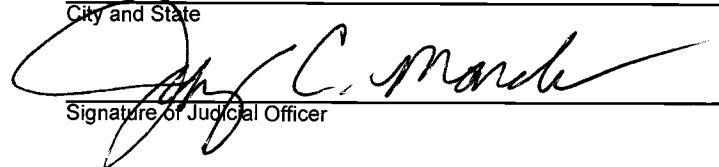
continued on the attached sheet and made a part hereof: YES



SCOTT JONES, Special Agent
Department of Veterans Affairs
Office of Inspector General, Criminal Investigation

Sworn to before me and subscribed in my presence,

November 21, 2017
Date
Jeffrey C. Manske
U.S. Magistrate Judge
Name & Title of Judicial Officer

Waco, Texas
City and State


Signature of Judicial Officer

AFFIDAVIT

I, Scott W. Jones, being duly sworn, depose and state as follows:

1. I am a Special Agent, Criminal Investigator, with the Department of Veterans Affairs, Office of Inspector General, Criminal Investigations Division (VA OIG), and have been so employed since 9/14/2014. I have served in law enforcement positions at both the local and federal level since 1995. I submit this affidavit in support of a request for a criminal Information against CHARLES JORDAN. JORDAN, and others, are being investigated regarding the identity theft of military veterans as well as impersonating an employee of the Department of Veteran Affairs to obtain Personally Identifiable Information (PII) for illegal financial gain, in violation of Title 18, United States Code, Sections 1028(a)(7) and 1028(f).

2. This investigation was initiated pursuant to a request for assistance from Killeen Police Department, Killeen, Texas, regarding a fraud investigation in which elderly military veterans were victims of identity theft. The initial joint investigation between the Killeen Police Department and the Copperas Cove Police Department, Copperas Cove, Texas, identified JORDAN as the primary suspect of a criminal affiliated group that was actively obtaining elderly veteran's PII and using that information to remove funds from their checking account or ordering credit cards in the victim's name during the time period of approximately December 6, 2014, and continuing until at least August 3, 2016.

3. Veteran J.K. contacted the Killeen Police Department when he discovered \$2,400.00 was transferred from his personal banking account without his consent. J.K. stated shortly prior to the unauthorized withdrawal of funds, he was contacted, via telephone, by an individual named "Robert Harris," purporting to be an employee of the Department of Veteran Affairs. J.K. provided his PII to "Robert Harris" believing the call was related to his Veteran Affairs benefits. J.K. surmised the two aforementioned events were related.

4. First National Bank of Texas provided information regarding the unauthorized withdrawal of J.K.'s money and determined the funds were transferred to a First National Bank of Texas account belonging to Shanice Sanders. It was further noted the transferred funds were immediately withdrawn from Sanders account on the same day they were deposited.

5. During a criminal interview Sanders admitted to opening an account at the First National Bank of Texas at the urging of a black male she knew only as "Slim." Sanders admitted to assisting with the withdrawal of the stolen funds and acknowledged she received approximately \$258 from "Slim" for the use of her First National Bank of Texas account.

6. A second criminal interview with Sanders revealed she had located "Slim's" real name through social media. Sanders stated the individual she knew as "Slim" was named CHARLES JORDAN.

7. An internal First National Bank of Texas audit revealed approximately twenty-five customers were victims of the same fraudulent scheme as J.K.;

accounting for an approximate total loss of \$92,000. Additionally, all victims were elderly military veterans.

8. A First National Bank of Texas fraud investigator identified and located a second co-conspirator, Bianca Moore, who fraudulently received a transfer of funds from a veteran victim. Moore admitted to giving her personal account information and debit card to a man named "Charles," who transferred money into her account then withdrew cash from said deposit.

9. Veteran W.R., a customer of First National Bank of Texas, provided a statement to Killeen Police Department that an unknown individual contacted him, via telephone, purporting to be an official from the Department of Veteran Affairs. W.R. provided the unknown individual PII. Shortly thereafter, \$2400 was fraudulently transferred to the account of Bianca Moore.

10. Veteran M.S., a customer of First National Bank of Texas, provided a statement to Killeen Police Department that an unknown individual contacted him, via telephone, purporting to be an official from the Department of Veteran Affairs. M.S. provided the unknown individual PII. Shortly thereafter, \$500 was fraudulently transferred to the account of Justine Gladden.

11. During an interview, Gladden stated she lost her debit card and was not aware of unauthorized deposits or withdrawals from her account. Gladden did not report the lost debit card to the police or First National Bank of Texas.

12. Veteran D.S., a customer of First National Bank of Texas, provided a statement to Killeen Police Department that an unknown individual contacted him,

via telephone, purporting to be an official from the Department of Veteran Affairs. D.S. provided the unknown individual PII. Shortly thereafter, \$700 was fraudulently transferred to the account of Hakeemah Fuller.

13. Veteran H.M., a customer of First National Bank of Texas, provided a statement to Killeen Police Department that an unknown individual contacted him, via telephone, purporting to be an official from the Department of Veteran Affairs. H.M. provided the unknown individual PII. Shortly thereafter, a USAA credit card was fraudulently ordered in H.M.'s name.

14. On July 26, 2016, Copperas Cove Police Department stopped a vehicle which was reported to contain multiple occupants who were covering their faces and acting "suspicious" while using an ATM machine located at 83 Cove Terrace in Copperas Cove, Texas. One of the occupants was identified as JORDAN. The occupants were detained, identified and release at the scene.

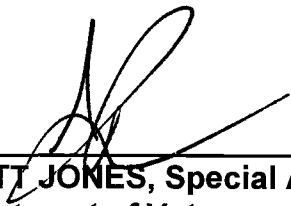
15. On July 27, 2016, a USAA Fraud Investigator contacted Killeen Police Department regarding the use of a USAA credit card fraudulently obtained in the name of H.M. The aforementioned card was utilized at an ATM located at 83 Cove Terrace in Copperas Cove, Texas at the same date and time Copperas Cove Police Department stopped the vehicle containing JORDAN.

16. USAA stated total fraud loss associated with the credit card fraudulently issued in the name of H.M. was \$8,700.00.

17. On August 10, 2016, Renewrick Hamilton, was arrested by the Killeen Police Department for outstanding warrants. It was noted JORDON was living in

Hamilton's home at the time of the arrest. Hamilton admitted he was aware JORDAN would call veterans and present himself as a representative of the Department of Veteran Affairs. According to Hamilton, JORDAN would conduct open-source research on his victims prior to calling them. Using the information he had obtained online, JORDAN would appear to be a credible government employee and would regularly receive PII from the victim. Hamilton stated JORDAN would use the information he obtained to access the victim's bank account or fraudulently order USAA credit cards in the name of the victim. Continuing, Hamilton stated JORDON would often call the First National Bank of Texas, disguise his voice to sound if he is an elderly man, and attempt to access the victim's bank account.

Affiant has interviewed several of JORDAN's co-conspirators in this investigation who have admitted that they participated in the identity theft conspiracy with JORDAN by opening accounts to be used in the scheme.



SCOTT JONES, Special Agent
Department of Veterans Affairs
Office of Inspector General
Criminal Investigation Division

SWORN TO AND SUBSCRIBED to before me this 21st day of November, 2017.



JEFFREY C. MANSKE
United States Magistrate Judge