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5	jim.fang@usdoj.gov Attorneys for the United States	Date: 10-9-2020 Time: 1:55pm
6	UNITED STATES DIS	-
7	DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	Case No. 2:20-mj- 896-VCF
9	Plaintiff,	COMPLAINT for violations of:
10	v.	Conspiracy to Commit Mail Fraud (18 U.S.C. § 1349)
11	JASMINE-ROYSHELL KANISHA BLACK,	Aggravated Identity Theft
12	Defendant.	(18 U.S.C. § 1028A(a)(1))
13		Obstruction of Mail (18 U.S.C. § 1702)
14		(10 0.5.0. § 1702)
15	BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned	
16	Complainant, being duly sworn, deposes and states:	
17	COUNT ONE Commingent to Commit Mail Fugud	
18	Conspiracy to Commit Mail Fraud (18 U.S.C. § 1349)	
19	1. From at least on or about June 18, 2020, to at least on or about July 14, 2020,	
20	in the State and Federal District of Nevada,	
21	JASMINE-ROYSHELL KANISHA BLACK,	
22	defendant herein, did knowingly and willfully conspire and agree with other persons known	
23	and unknown, including Vincent Okoye, to commit the crime of Mail Fraud in violation of	
24	18 U.S.C. § 1341.	

2. The purpose of the Mail Fraud was to implement a scheme and artifice to
 defraud and for obtaining money and property by means of materially false and fraudulent
 pretenses, representations, and promises from Nevada's Department of Employment,
 Training and Rehabilitation ("DETR") and Arizona's Department of Economic Security
 ("DES") unemployment insurance benefits to which defendant and her coconspirators were
 not entitled.

3. On or about July 10, 2020, defendant and her coconspirators, for the purposes
of executing the scheme and artifice to defraud, caused a DETR debit card with the last four
digits of the account number being 6082 issued in the name of C.T. to be sent and mailed to
a residence on Shawnee Ridge Street in Las Vegas, Nevada, by mail and private and
commercial carrier, all in violation of 18 U.S.C. § 1349.

<u>COUNT TWO</u> Aggravated Identity Theft (18 U.S.C. § 1028A(a)(1))

On or about July 10, 2020, in the State and Federal District of Nevada, JASMINE-ROYSHELL KANISHA BLACK,

defendant herein, did knowingly possess and transfer, without lawful authority, a means of
identification of another person, to wit: a debit card from the Nevada Department of
Employment, Training and Rehabilitation, with the last four digits of the account number
being 6082 issued in the name of C.T., during and in relation to a felony violation
enumerated in 18 U.S.C. § 1028A(c), that is, the violation of 18 U.S.C. § 1349 as described
in Count One, knowing that the means of identification belonged to another actual person,
in violation of 18 U.S.C. § 1028A(a)(1).

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COUNT THREE Obstruction of Mail (18 U.S.C. § 1702)

On or about July 10, 2020, in the State and Federal District of Nevada,

JASMINE-ROYSHELL KANISHA BLACK,

defendant herein, took letters and packages, including an envelope containing a debit card from the Nevada Department of Employment, Training and Rehabilitation, with the last four digits of the account number being 6082 issued in the name of C.T., which had been in a post office and an authorized depository for mail matter before they had been delivered to the persons to whom they were directed, with design to obstruct the correspondence of said persons, in violation of 18 U.S.C. § 1702.

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PROBABLE CAUSE

Complainant, Jeffrey Lomas, states the following as and for probable cause.

1. I am a Detective with the Las Vegas Metropolitan Police Department where I have been employed for 12 years. I have been assigned to the Digital Investigation Bureau in the Digital Forensics Lab as a digital forensic examiner for four years and the Cyber Investigative Group for approximately 10 months. I am also part of the United States Secret Service Cyber Fraud Task Force and have been for approximately 5 years. I have over 1,000 hours of digital forensic and cyber investigative-related training, I hold a B.S. in Intelligence Management, an M.S. in Cybersecurity, and regularly teach others outside of my employment as a detective in the areas of digital forensics, cyber investigations, and open source intelligence.

2. The following information contained within this Criminal Complaint is based upon my own participation in this investigation, as well as information and reports provided 24 to me by other law enforcement personnel. This statement does not include any and all

information in reference to this investigation, but rather only those facts necessary to
 establish probable cause.

3. 3 On July 29, 2020, Your Honor issued a Complaint in Case No. 2:20-mj-622-VCF in the District of Nevada charging Vincent Okoye with Possession of Counterfeit and 4 5 Unauthorized Access Devices, in violation of 18 U.S.C. §1029(a)(3), and Aggravated 6 Identity Theft, in violation of 18 U.S.C. § 1028A(a)(1), for his role in a scheme to 7 fraudulently obtain debit cards containing unemployment benefits.¹ As described below, 8 subsequent investigation has revealed that Okoye and his coconspirators, including 9 Defendant JASMINE-ROYSHELL JANISHA BLACK, used the mail in furtherance of 10 that scheme and that BLACK participated in that scheme by exploiting her access to the 11 mail through her employment as a United States Postal Service ("USPS") mail carrier.

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Discovery of the Scheme

4. 13 On July 15, 2020, Las Vegas Metropolitan Police Department ("Metro") 14 executed a search warrant upon the residence, car, and person of an individual by the name 15 of Vincent Okoye, in connection with a fraud investigation against him, and recovered, 16 either as objects to be seized under the search warrant or in plain-view as probable evidence 17 of crimes: (1) \$96,870 in United States Currency; (2) approximately \$12,000 in US Money 18 Orders; (3) a forged Canadian Passport; (4) postal mailbox master keys; (5) over 100 pieces 19 of mail bearing names and addresses not belonging to Okoye; (6) at least 24 pieces of mail 20 from the Nevada Department of Employment, Training and Rehabilitation ("DETR") bearing various names and addresses; and (7) at least 100 credit and debit cards not issued in 21 22 Okoye's name, including at least 11 DETR debit cards and at least 12 debit cards issued by 23

^{24 &}lt;sup>1</sup> A federal grand jury has since returned an indictment against Okoye in Case No. 2:20-cr-201-GMN-BNW (D. Nev.).

Arizona's Department of Economic Security ("DES").² Below is an example of one of the
 DETR cards recovered in Okoye's wallet on his person at the time of the search.



5. DETR, DES, and bank records show that the debit cards found in OKOYE's possession had been approved for at least \$462,000 of unemployment insurance benefits and had been funded with at least \$145,000 of such benefits.

6. Based on my training and experience, due to the large amounts of personal
identification information ("PII") present in Okoye's residence, the large number of credit
and debit cards recovered not issued in Okoye's name, the mailings from DETR and DES,
and the presence of many DETR and DES debit cards also not issued in Okoye's name,
there is probable cause to believe that Okoye's possession of these credit and debit cards
were not authorized.

7. For example, I interviewed R.T., the individual whose name is on the
aforementioned DETR card, and he confirmed that he did not apply for unemployment
benefits. He also informed me that he was aware of the fraud and had already submitted

² DETR is the agency that administers Nevada's unemployment insurance program, which is designed to provide benefits to eligible workers who become unemployed through no fault of their own. DETR provides unemployment insurance benefits to qualified applicants on a debit card. DES administers the unemployment insurance program for Arizona.

reports with the police department and the Nevada State Attorney General's Office. He was
 able to learn of the fraud because he has his own business, and the business was notified that
 one of its employees, namely R.T. the owner, had applied for unemployment benefits.

8. 4 In addition, there is probable cause to believe that at least some of the DETR 5 and DES debit cards were obtained by fraudulent means, e.g., filing false unemployment 6 benefits claims using PII of other individuals. For example, at least 10 DES debit cards 7 recovered from Okoye's residence were mailed to the same address on Bennett Mountain 8 Street in Las Vegas. These 10 cards were issued in the names of ten different individuals 9 who all had different last names. In addition, officers recovered from Okoye's residence 10 mailings from DETR to at least another three individuals sent to that same Bennett 11 Mountain address. A Google Maps search shows that this address appears to be a single-12 family residence. Therefore, it is unlikely that 13 different individuals who all qualify for 13 DES or DETR benefits live at that location.

9. As another example, officers recovered from Okoye's car and residence
mailed correspondence from DETR addressed to at least 18 different individuals (all with
different last names) at the same address on Shawnee Ridge Street in Las Vegas, Nevada. A
Google Maps search shows that this address also appears to be a single-family residence.
Therefore, it is unlikely that 18 different individuals who all qualify for DETR benefits live
at that location.

10. Moreover, although not attached to the DETR mailings recovered, three
DETR cards bearing names that correspond to mailings sent to the Shawnee Ridge Street
address were also recovered. In addition to the DETR card issued to R.T. that was found
on OKOYE's person at the time of his arrest, officers recovered the following DETR card
issued in C.T.'s name at Okoye's residence:

Neva VATE YOUR CARD AND SELECT YOUR PIN www.bankofamerica.com/nevadauidebitcard Toll free Number: 1.888.339.8569 TTY# 1.866.656.5913

11. C.T., the individual whose name is on the DETR card above, was interviewed by another agent, and C.T. confirmed to that agent that he did not apply for unemployment benefits. C.T. also informed the agent that he was still employed and had been continuously employed even through the pandemic shutdown, thus would have had no basis to apply for unemployment benefits. Additionally, C.T. told the agent that his employer alerted him of the fraudulent unemployment benefits claim. When C.T. informed his employer that he did not apply for such benefits, his employer reported the fraud to DETR.

Discovery of BLACK's Participation in the Scheme

12. Pursuant to a search warrant authorized by the Eighth Judicial District Court in Clark County, Nevada, I conducted a search of Okoye's two cellphones found on his person and discovered electronic communications between Okoye and BLACK using the WhatsApp messaging application on one of the phones. Based on my knowledge and experience, I know that a WhatsApp ID is usually the cellphone number of the person associated with said WhatsApp ID. Using the Accurint database, I determined that the WhatsApp ID communicating with Okoye belonged to BLACK. In addition, the

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WhatsApp ID communicating with Okoye was saved under the name "J Black," which is
 BLACK's first initial and last name. Finally, there are numerous photos of said individual
 sent to Okoye from said WhatsApp ID that matched BLACK's Nevada driver's license
 photo.

In these messages, BLACK informed Okoye of mailing addresses where the
residents either retrieve their mail infrequently or not at all (e.g. due to the residence being a
vacation property). BLACK was employed as a postal carrier for the USPS and knew about
the mail activities of these addresses because they were on the route BLACK delivered mail.
Based on the evidence recovered from his residence, OKOYE used those mailing addresses
as straw addresses in the unemployment benefits fraud.

14. For example, on June 18, 2020, BLACK informed Okoye that he could still
 use the Bennett Mountain Street address described in Paragraph 8 and suggested another
 address on Shawnee Ridge Street that he could use in the future as shown in this image of
 the WhatsApp message with house numbers redacted:³

J Black Babe just continue to use Bennett mountain and u can try Bennett Shawnee ridge.. they barely check their box.. and Bennett mountain the lady don't check her box it's a vacation home her parents got [.] 6/18/2020 18:03(UTC-7)

15. Additionally, on July 1, 2020, BLACK asked if Okoye had sent mailings to the Shawnee Ridge Street address described in Paragraph 9, and further stated that she provided Okoye with said address previously.

BLACK also used WhatsApp to send Okoye photos of certain mailings from
 DETR and DES directed to the Bennett Mountain Street and the Shawnee Ridge Street

³ The redacted house number in the image of BLACK's message above is the house next door to the Shawnee Ridge Street address described in Paragraph 9.

addresses to confirm that they were "his" and, once Okoye confirmed that fact, the two
 would arrange for delivery of said mailings from BLACK to Okoye. For example, on July
 10, 2020, BLACK sent to Okoye, among others, a photo of this piece of mail addressed to
 C.T. at the Shawnee Ridge Street address described in Paragraph 9:

DIATELY **NOT DISCARD, OPEN IN** INFORMATION 9515 00000000445/ 8 ag a far iggeratering a AS VEGAS NV FULMARI

17. C.T. is the same individual whose debit card mentioned above was recovered at Okoye's residence. On that same day, BLACK sent Okoye another message stating,
"[a]ll your stuff came." Later, Okoye arranged to pick up the mailings from BLACK.
There is probable cause to believe that BLACK had personally delivered and transferred
C.T.'s DETR debit card to Okoye after intercepting the mailing during the performance of her official duties as a postal carrier, either on July 10, 2020, or on another date.

18. In another example, on July 11, 2020, BLACK sent to Okoye a photo of this mailing addressed to R.T.at the Shawnee Ridge Street address described in Paragraph 9:



19. R.T. is the same individual whose debit card mentioned above was recovered 10 in Okoye's wallet. There is probable cause to believe that BLACK had personally delivered and transferred R.T.'s DETR debit card to Okoye after intercepting the mailing during the 12 performance of her official duties as a postal carrier, either on July 11, 2020, or on another 13 date. 14

20. In all, BLACK sent Okoye photos of at least eight pieces of mail, addressed to 15 different individuals using the Bennett Mountain Street or Shawnee Ridge Street addresses, 16 that correspond to individuals whose DETR debit cards were recovered at Okoye's 17 residence, car, and person on July 15, 2020. 18

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1	21. Based on the above, I believe there is probable cause that, on or about the	
2	dates above, JASMINE-ROYSHELL KANISHA BLACK did commit violations of 18	
3	U.S.C. § 1349 (Conspiracy to Commit Mail Fraud), 18 U.S.C. §1028A(a)(1) (Aggravated	
4	Identity Theft), and 18 U.S.C. § 1072 (Obstruction of Mail).	
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6	1000-	
7	Jeffrey Lomas, Task Force Officer United States Secret Service	
8	Cyber Fraud Task Force	
9	Attested to by the applicant in accordance with the requirements	
10	of Fed. R. Crim. P. 4.1 by telephone on October <u>9</u> , 2020.	
11	Contactor C.	
12	HONORABLE CAM FERENBACH	
13	UNITED STATES MAGISTRATE JUDGE	
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