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FILED
U.S. MAGISTRATE JUDGE
Date: 10-9-2020
Time: 1:55pm

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7 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 JASMINE-ROYSHELL KANISHA BLACK,

12 Defendant.

Case No. 2:20-mj- 896-VCF

COMPLAINT

for violations of:

Conspiracy to Commit Mail Fraud
(18 U.S.C. § 1349)

Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

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

15 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
16 Complainant, being duly sworn, deposes and states:

17 **COUNT ONE**
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.

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



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

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

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

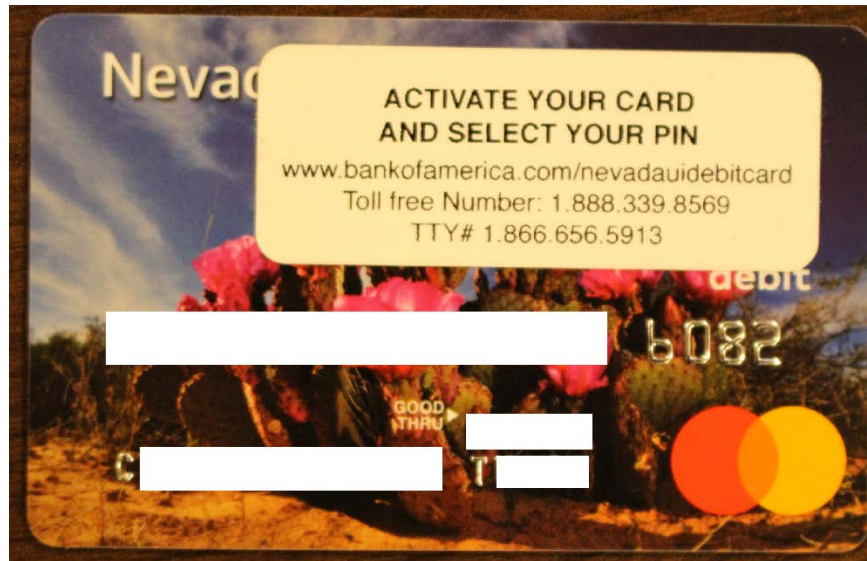
22 _____
23 ² DETR is the agency that administers Nevada's unemployment insurance program, which
24 is designed to provide benefits to eligible workers who become unemployed through no fault
of their own. DETR provides unemployment insurance benefits to qualified applicants on a
debit card. DES administers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

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

4 8. 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.

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

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



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

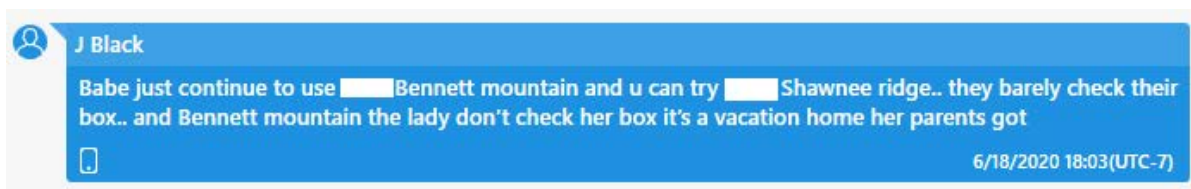
17 Discovery of BLACK's Participation in the Scheme

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

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

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

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

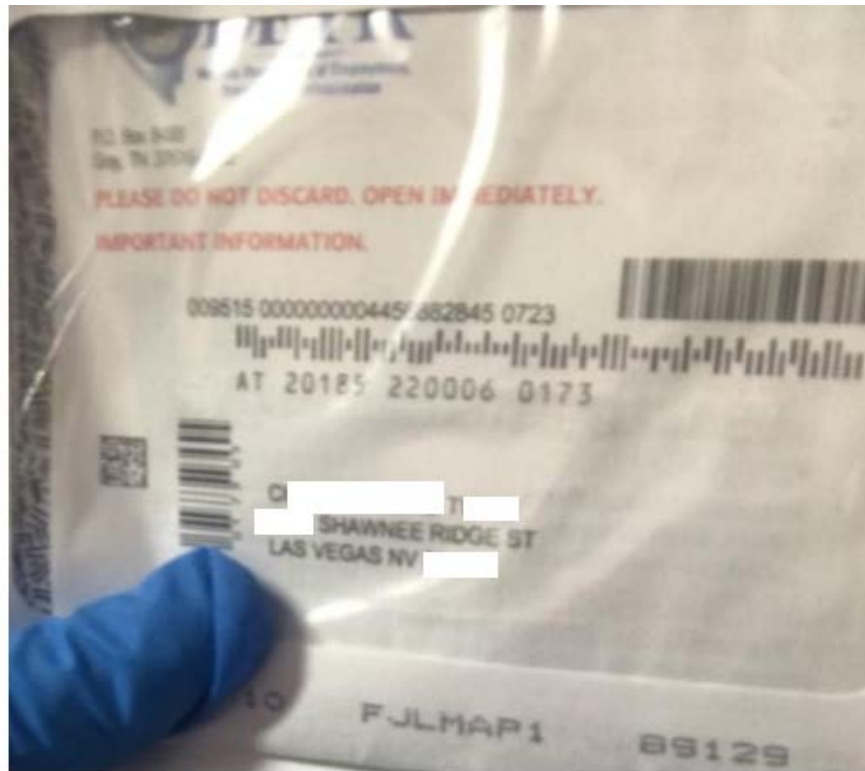


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18 15. Additionally, on July 1, 2020, BLACK asked if Okoye had sent mailings to
19 the Shawnee Ridge Street address described in Paragraph 9, and further stated that she
20 provided Okoye with said address previously.

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

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24 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.

1 addresses to confirm that they were “his” and, once Okoye confirmed that fact, the two
2 would arrange for delivery of said mailings from BLACK to Okoye. For example, on July
3 10, 2020, BLACK sent to Okoye, among others, a photo of this piece of mail addressed to
4 C.T. at the Shawnee Ridge Street address described in Paragraph 9:



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

22 18. In another example, on July 11, 2020, BLACK sent to Okoye a photo of this
23 mailing addressed to R.T. at the Shawnee Ridge Street address described in Paragraph 9:
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19. R.T. is the same individual whose debit card mentioned above was recovered 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 performance of her official duties as a postal carrier, either on July 11, 2020, or on another date.

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

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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 
 7 Jeffrey Lomas, Task Force Officer
 8 United States Secret Service
 9 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 9, 2020.

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12 HONORABLE CAM FERENBACH
 13 UNITED STATES MAGISTRATE JUDGE

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