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FILED.

DATED: 2:17 pm, October 13, 2020

U.S. MAGISTRATE JUDGE

6  
7 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

Case No. 2:20-mj- 00903-DJA

9 Plaintiff,

**COMPLAINT**

for violations of:

10 v.

Mail Fraud (18 U.S.C. § 1341)

11 ANTWINE D. HUNTER,

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

12 Defendant.

13  
14 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
15 Complainant, being duly sworn, deposes and states:

16 COUNT ONE  
17 Mail Fraud  
(18 U.S.C. § 1341)

18 1. Beginning on a date unknown and continuing until at least on or about  
19 September 28, 2020, in the State and Federal District of Nevada,

20 ANTWINE D. HUNTER,

21 defendant herein, participated in and devised and intended to devise a scheme and artifice  
22 to defraud and for obtaining money and property by means of materially false and  
23 fraudulent pretenses, representations, and promises.

24



1 various DOL programs. I have conducted investigations of criminal activity involving  
2 unemployment insurance fraud, workers' compensation fraud, and labor racketeering.

3 2. The following information contained within this Criminal Complaint is based  
4 upon my own participation in this investigation, as well as information and reports provided  
5 to me by other law enforcement personnel. This statement does not include any and all  
6 information in reference to this investigation, but rather only those facts necessary to  
7 establish probable cause.

8 3. On September 28, 2020, Las Vegas Metropolitan Police Department  
9 ("LVMPD") served and carried out a search warrant on Defendant ANTWINE D.  
10 HUNTER of his person and residence, after HUNTER was discovered selling illegal  
11 narcotics out of his residence in Las Vegas, Nevada.

12 4. During the search, officers discovered at least eight debit cards from the  
13 Nevada Department of Employment, Training, and Rehabilitation ("DETR") not issued in  
14 HUNTER's name, including cards issued in the names of L.B., B.N., and R.P., some of  
15 which were still attached to the original mailings from DETR. The DETR debit cards found  
16 in HUNTER's residence had been approved for at least \$215,000 of unemployment  
17 insurance benefits.

18 5. Officers also recovered at least 15 identification cards of various individuals  
19 not belonging to HUNTER, most of which were government-issued IDs such as driver's  
20 licenses from multiple states (including one that appears to be a Canadian ID) and Social  
21 Security cards.

22 6. Additionally, officers recovered what appears to be notes and instructions on  
23 how to apply for unemployment benefits from DETR and the California Employment  
24 Development Department ("EDD"). One particular note, containing the personal

1 identification information (“PII”) of L.B., was among the instructions recovered. The note  
2 contained detailed information about L.B., including L.B.’s Social Security number, date of  
3 birth, place of birth, occupation, email address, maiden name, and mailing address. It also  
4 appears to contain the checking and savings account numbers for L.B. at the Wells Fargo  
5 bank. L.B.’s California driver’s license was also recovered.

6 7. As discussed above, one of the DETR debit cards recovered at Defendant’s  
7 residence was issued to L.B., which was attached to the original DETR mailing. The  
8 address on the DETR mailing (an apartment in Las Vegas, Nevada) does not match the  
9 mailing address in the aforementioned note about L.B. Accordingly, there is probable cause  
10 to believe that HUNTER used L.B.’s PII to apply for DETR benefits, but used a different  
11 address so that he would receive the DETR debit card by mail instead of L.B.

12 8. DETR records show that, between June 4, 2020, and August 18, 2020, 15  
13 claims filed with DETR (all using the identities of people with different last names) used  
14 that same apartment as the mailing address, including (a) the claim in L.B.’s name discussed  
15 above; (b) a claim in the name of B.N., which matched a DETR debit card recovered from  
16 HUNTER’s residence; and (c) a claim in HUNTER’s name.

17 9. DETR records also show that, between July 21, 2020, and July 25, 2020, four  
18 claims filed with DETR (all using the identities of people with different last names) used  
19 HUNTER’s residence as the mailing address, including (a) a claim in the name of R.P,  
20 which matched a DETR debit card recovered from HUNTER’s residence; and (b) a claim in  
21 the name of B.H., whose PII was found in HUNTER’s residence on a piece of paper.

22 10. Based on my training and experience, due to the large number of debit cards  
23 recovered not issued in HUNTER’s name, numerous ID cards recovered not belonging to  
24 HUNTER, and the notes and instructions recovered on how to apply for unemployment

1 benefits using other people's PII, there is probable cause to believe that HUNTER  
2 knowingly and intentionally participated in and devised a scheme and artifice to defraud  
3 and for obtaining money and property by means of materially false and fraudulent  
4 pretenses, representations, and promises from DETR and EDD.

5 11. Because some of the debit cards recovered were attached to their original  
6 mailings from DETR, there is also probable cause to believe that HUNTER caused and  
7 intended to cause DETR to send and deliver the fraudulently obtained DETR debit cards by  
8 mail.

9 12. Based on the above, I believe there is probable cause that ANTWINE D.  
10 HUNTER did violate 18 U.S.C. § 1341 (Mail Fraud), and 18 U.S.C. § 1028A(a)(1)  
11 (Aggravated Identity Theft).

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15 Joshua Arambulo, Special Agent  
16 United States Department of Labor  
17 Office of the Inspector General

18 Attested to by the applicant in accordance with the requirements  
19 of Fed. R. Crim. P. 4.1 by telephone on October 13 , 2020.

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21 \_\_\_\_\_  
22 HONORABLE DANIEL J. ALBREGTS  
23 UNITED STATES MAGISTRATE JUDGE

