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FILED  
U.S. MAGISTRATE JUDGE  
Date: 10-9-2020  
Time: 12:20PM

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

8 UNITED STATES OF AMERICA,  
9  
10 Plaintiff,  
11 v.  
12 KEHEIR JORDAN PARKER, and  
13 ROBERT BARBER,  
14 Defendants.

Case No. 2:20-mj- 895-VCF

**COMPLAINT**  
for violations of:  
Conspiracy to Effectuate Illegal Transaction  
With an Access Device  
(18 U.S.C. § 1029(b)(2))  
Aggravated Identity Theft  
(18 U.S.C. § 1028A(a)(1))

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

18 COUNT ONE  
19 Conspiracy to Effect Illegal Transactions With Access Devices  
(18 U.S.C. § 1029(b)(2))

20 1. From at least on or about September 2, 2020, until at least on or about  
21 September 11, 2020, in the State and Federal District of Nevada and elsewhere,

22 KEHEIR JORDAN PARKER and

23 ROBERT BARBER,  
24

1 defendants herein, did knowingly and willfully conspire and agree with each other, and with  
2 other persons known and unknown, to commit the crime of Illegal Transactions With an  
3 Access Devices in violation of 18 U.S.C. § 1029(a)(5).

4 2. In furtherance of the conspiracy, defendants engaged in the following  
5 conduct:

6 a. On or about September 2, 2020, while in Victorville, California,  
7 defendants used California Employment Development Department (“EDD”) debit cards  
8 issued in the name of M.Ma. and M.Me. to make ATM withdrawals totaling \$2,000.

9 b. On or about September 11, 2020, while in Las Vegas, Nevada,  
10 defendants used EDD debit cards issued in the name of D.C., M.F., K.H., K.J., and M.Ma.  
11 to make ATM withdrawals totaling \$4,400.

12 3. All in violation of 18 U.S.C. § 1029(b)(2).

13 COUNT TWO  
14 Aggravated Identity Theft  
(18 U.S.C. § 1028A(a)(1))

15 On or about September 11, 2020, in the State and Federal District of Nevada,

16 KEHEIR JORDAN PARKER and

17 ROBERT BARBER,

18 defendants herein, did knowingly possess and use, without lawful authority, the means of  
19 identification of other people, to wit, EDD debit cards issued in the name of a California  
20 Employment Development Department debit card issued in the names of D.C., M.F., K.H.,  
21 K.J., M.Ma., and M.Me., during and in relation to a felony violation enumerated in 18  
22 U.S.C. § 1028A(c), that is, the violation of 18 U.S.C. § 1029(b)(2) described in Count One,  
23 knowing that the means of identification belonged to actual people, in violation of 18  
24 U.S.C. § 1028A(a)(1).

1 **PROBABLE CAUSE**

2 Complainant, Anthony Clark, states the following as and for probable cause:

3 1. I am a Special Agent (SA) employed by the United States Department of  
4 Labor (DOL), Office of Inspector General (OIG), Office of Investigations – Labor  
5 Racketeering and Fraud, in Las Vegas, Nevada, and have been so employed since January  
6 2019. As a DOL OIG SA, my duties include investigating fraud, waste, and abuse of  
7 various DOL programs. I have conducted investigations of criminal activity involving  
8 unemployment insurance fraud, workers’ compensation fraud, and grant fraud.

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

14 3. On September 11, 2020, Las Vegas Metropolitan Police Department  
15 (“LVMPD”) effectuated a traffic stop, on Park Avenue in Las Vegas, of a white Mercedes  
16 sedan driven by Defendant KEHEIR JORDAN PARKER (“PARKER”), with Defendant  
17 ROBERT BARBER (“BARBER”) as a passenger. PARKER was found to have an  
18 outstanding arrest warrant against him and was thus apprehended. During a search  
19 incident to arrest, officers found \$4,522 in U.S. currency on PARKER’s person. Because  
20 BARBER did not possess a valid driver’s license and thus cannot take possession of the  
21 vehicle, the vehicle was impounded.

22 4. Officers conducted an inventory search of the vehicle, and found (1) various  
23 prescription pills, (2) \$2,130 in U.S. currency, (3) 12 debit cards issued by the Bank of  
24 America, all in different names and none in the defendants’ names, to disburse

1 unemployment insurance benefits for the California Employment Development Department  
2 (“EDD”),<sup>1</sup> and (4) seven Bank of America ATM receipts, each documenting a withdrawal of  
3 \$1,000, six of which match<sup>2</sup> the EDD cards found in the vehicle. Below is an example of  
4 one of these cards (issued in the name of D.C.) and the matching ATM receipt:



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13 5. Of the 12 EDD debit cards, six (including a card issued in the name of  
14 M.Me.) were found in PARKER’s wallet, two (including a card issued in the name of K.J.)  
15 were found in a bag that BARBER claimed belonged to him, and four (including cards  
16 issued in the name of D.C., K.H., M.F., and M.Ma) were located in a red fanny pack in the  
17 back seat of the Mercedes. EDD records show that the 12 debit cards recovered from  
18 PARKER and BARBER had been approved for at least \$150,000 of unemployment  
19 insurance benefits.

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21  
22 <sup>1</sup> EDD is the agency that administers California’s unemployment insurance program, which  
23 is designed to provide benefits to eligible workers who become unemployed through no fault  
24 of their own. EDD provides unemployment benefits to qualified applicants on a debit card.

<sup>2</sup> The ATM receipt only identifies the last four digits of the card used during the withdrawal.  
Those last four digits match the last four digits of the EDD card.

1           6.       BARBER was arrested after the discovery of these EDD cards and ATM  
2 receipts. During the search incident to arrest, officers found, on BARBER's person, \$5,228  
3 in U.S. currency and another ATM receipt documenting the withdrawal of \$1,000 using the  
4 EDD card issued in the name of K.J. found in the bag BARBER claimed was his.

5           7.       Of the eight total ATM receipts recovered, four show the use of the cards  
6 issued in the name of D.C., M.F., K.H., and M.Ma. at the same location in Las Vegas,  
7 Nevada, all within three minutes of each other on September 11, 2020, the day of the  
8 arrests. All four of these cards were found in the red fanny pack in the back seat of the  
9 Mercedes. A fifth receipt shows another transaction in Las Vegas less than three hours later  
10 using the card issued in the name of K.J.

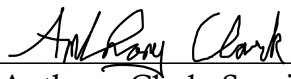
11           8.       Three of the other ATM receipts show transactions made on three cards (two  
12 issued in the names of M.Ma and M.Me and an unknown third card not recovered) at the  
13 same location in Victorville, California, all within four minutes of each other on September  
14 2, 2020. Victorville is the town where PARKER resides according to his California  
15 identification card. These receipts match one of the EDD cards found in PARKER's wallet  
16 and one of the EDD Cards found in the red fanny pack.

17           9.       After being read his Miranda rights, when an officer asked PARKER about  
18 the debit cards, PARKER claimed they all belonged to his family members. None of the 12  
19 cards recovered were in the names of someone with the last name PARKER. In fact, the 12  
20 cards were all issued under 12 different last names.

21           10.      Based on my training and experience, due to the large number of debit cards  
22 recovered not issued in defendants' names, and evidence of their use at the same locations  
23 within a very short amount of time, there is probable cause to believe that defendants'  
24 possession and use of these debit cards were not authorized.

1 11. Defendants' conduct affected interstate commerce because they transported  
2 the unauthorized EDD cards across state lines and effectuated transactions using those  
3 cards in another state, namely Nevada.

4 12. Based on the above, I believe there is probable cause that KEHEIR JORDAN  
5 PARKER and ROBERT BARBER did violate 18 U.S.C. § 1029(b)(2) (Conspiracy to  
6 Effectuate Illegal Transaction With an Access Devices Issued to Another Person), and 18  
7 U.S.C. § 1028A(a)(1) (Aggravated Identity Theft).

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10 Anthony Clark, Special Agent  
11 United States Department of Labor  
Office of the Inspector General

12 Attested to by the applicant in accordance with the requirements  
13 of Fed. R. Crim. P. 4.1 by telephone on October 9, 2020.

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15 HONORABLE CAM FERENBACH  
16 UNITED STATES MAGISTRATE JUDGE  
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